

Idaho Department of Environmental Quality

March 16, 2012

Attn. Jack Gantz

1445 N Orchard St

Boise, ID 83706

Subject: Dynamis Permit

To: Director Fransen

I am writing this letter to oppose issuing a permit to Dynamis to operate the incinerator/generator at the public landfill. I live in Hidden Springs, and I am concerned about the impact of this facility on our community. I have attended a meeting and listened to Dynamis executives explain that this facility would be a prototype, as yet untested in the US, by Dynamis. I have seen their estimates of the pollutants they would put in the air, given a 250 ton capacity facility. The numbers presented were a small fraction of EPA allowances for most of the pollutant stream, but when asked if they would stand behind those numbers and be accountable for the numbers presented, they said no, they will be accountable only to the EPA standards for the pollutants presented. Now I learn that they are no longer proposing a 250 ton/day facility, but they are proposing to increase that to 408 tons/day. This is a 63% increase. Just this increase alone should require they restart all the permitting processes.

The Dynamis executives also acknowledged that dioxins will also be a part of the pollutant stream. While there may be an EPA standard for these carcinogens, I don't believe anyone should be put in a situation where they have to breath the allowable limit of these pollutants. I have lived in the Treasure Valley long enough to see the pollution build up when we get an inversion. I do not want to be downwind of the landfill in Hidden Springs when dioxins build up as a result of an inversion. You are aware of the nonattainment air quality issues present in the Treasure Valley, and I expect that any permit issued in the Valley should include stipulations to insure that nonattainment issues are avoided.

At a minimum, DEQ needs to verify the pollutant stream data presented by Dynamis prior to being permitted. Given that this is a prototype facility, no operating data is available. If verification is not possible prior to building the facility, then a conditional permit needs to be issued, so that operating data can be reviewed, and the plant altered to meet needed standards (not just EPA standards) to avoid nonattainment during inversions, or shut down completely if required pollutant streams are not possible.

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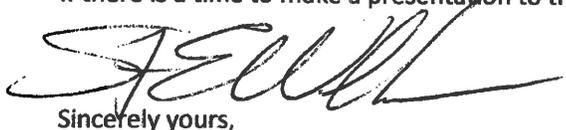
Other than denying the permit, which I believe is appropriate in this case given the location, untested technology, and the inversion potential in the valley, I see several other options in the following order of preference:

1. Site the facility away from towns and out of the foothills to minimize the dangerous buildup of pollutants in populated areas. Haul garbage there on an as needed basis;
2. Permit the site, but require that Dynamis fund DEQ's air monitoring of the site and monitoring of inversion potentials. Also require Dynamis to agree to trigger points and shut down procedures to avoid pollutant buildups during inversions;
3. Permit the site, but restrain their pollutant stream to the estimated levels they presented to us here in Hidden Springs;

I am aware that DEQ has very limited monitoring/enforcement capabilities. The last thing I want is a facility that isn't monitored nor required to meet the levels of pollutants they presented to the residents of Hidden Springs. I also do not want a plant that keeps pumping pollution into the air when we get an inversion. Nonattainment of dioxin levels is especially frightening. DEQ needs to think about these situations and insure that air quality does not put anyone's health (the young, the old, or the ill) at risk anytime.

Please add me to any list you have so that I may be kept informed on this issue.

If there is a time to make a presentation to the Department, let me know.



Sincerely yours,

Steve Williams

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Boise, ID 83714