

Jack Gantz

From: publiccomments <publiccomments@dynamisenergy.com>
Sent: Wednesday, April 11, 2012 4:55 PM
To: Jack Gantz
Cc: doyle@dynamisenergy.com
Subject: Fwd: Public comment on Solid Waste Site Plan Application
Attachments: SKMBT_C22012041114330.pdf

Begin forwarded message:

From: "HSTA" <hsta@hiddensprings.com>
Date: April 11, 2012 2:43:33 PM MDT
To: <publiccomments@dynamisenergy.com>
Subject: Public comment on Solid Waste Site Plan Application

Dear Mr. Pergande

Please see the attached public comment regarding the proposed Waste-to-Energy Facility and Solid Waste Site Plan Application.

A copy of this letter has also been mailed to Idaho DEQ to the attention of Mr. Jack Gantz.

Colten Tippetts
Hidden Springs Town Manager
5890 W Hidden Springs Dr.
Boise, ID 83714
(208) 229-2323 ext 32
cell 447-9427



RECEIVED

APR 12 2012

DEPARTMENT OF
ENVIRONMENTAL QUALITY
BOISE REGIONAL OFFICE

Idaho Department of Environmental Quality
Attn: Jack Gantz
1445 N. Orchard St.
Boise ID 83706

Subject: Public Comments – Dynamis Energy Waste-to-Energy Proposal

Dear Mr. Gantz and the Idaho Department of Environmental Quality:

The Hidden Springs Town Council is providing these comments on the Dynamis Energy Waste-to-Energy Project proposal (the “WTE Project”) for your consideration as part of the permitting and public comment process. These comments on the WTE Project are made on behalf of the community of Hidden Springs, which is the closest residential area to the WTE Project and is within the area of impact of the WTE Project.

As an initial matter, the Hidden Springs Town Council would note that it is not generally opposed to this type of project, which would turn waste materials, otherwise destined for the Hidden Hollow landfill, into energy. However, the WTE Project, and the information that has to date been provided to the public, leaves too many questions unanswered about WTE Project operations, the amount of waste to be processed, emissions, resulting solid waste ash and by-products, among other things. As a result of this lack of information, the Hidden Springs Town Council feels compelled to provide this public comment **in opposition** to the WTE Project at this time.

The Hidden Springs Town Council believes that Dynamis Energy, LLC, and Ada County, should provide the public, stakeholders, and the Division of Environmental Quality (“DEQ”) with the following:

1. A statement regarding the actual tonnage of Municipal Solid Waste and tires, which will be processed at the WTE Project.¹
2. Engineering and/or environmental studies or surveys related to the expected air emissions from the WTE Project.

¹ Ada County initially gave Dynamis Energy the non-exclusive right to 250 tons of waste. See June 30, 2010 Letter from Ada County to L. Mahaffey. The Landfill Waste to Energy Franchise Agreement modified the tonnage upwards to a “minimum average of 408 tons of Municipal Solid Waste...” See Landfill Waste to Energy Franchise Agreement, at Recital F. The Siting Plan Application provided by Dynamis Energy now notes a volume/mass of “408 TPD MSW & 12,000 lbs per day Tires.” See Siting Plan Application, at page 4.

3. Engineering and/or environmental studies or surveys related to the expected residual and/or resulting ash, waste, and/or by-products from the combustion process.
4. Assurance that the WTE Project and the associated emissions will meet current DEQ and Environmental Protection Agency ("EPA") regulations and requirements.²
5. Assurance that the WTE Project and the residual solid waste, ash, and/or other resulting by-products of the WTE process will meet current DEQ and Environmental Protection Agency ("EPA") regulations and requirements and that these by-products will not cause potential harm to the watershed or water table.
6. A detailed description of the monitoring process and systems to be used to monitor stack and other air and noise emissions from the WTE Project.
7. A detailed description of the monitoring process and systems to be used to monitor the disposal and impact of ash, by-products, and/or resulting residual solid waste from the WTE Project.
8. A financial statement and/or financial projections related to the economic viability of the WTE Project and some assurance that Dynamis Energy can support the costs and expenses associated with the WTE Project.³

In short, Dynamis Energy has failed to provide the public with sufficient information and documentation related to the WTE Project. It is our belief that Dynamis Energy and Ada County should provide the items requested above so that persons and communities potentially impacted by the WTE Project, like Hidden Springs, have the opportunity to fully consider those potential impacts. Without some assurances about the safety and viability of the WTE Project, we remain opposed to the significant deviations from existing standards and permitting requirements requested by Dynamis Energy.

Please do not hesitate to contact the Hidden Springs Town Manager, Colten Tippetts, if you would like to schedule some time to discuss these concerns in greater detail. Thank you for your consideration of our comments.

CC: Dynamis Energy LLC (via email)
Ada County (via mail)

² Dynamis Energy has changed its position on the air emissions as the approval process has moved forward. Initially Dynamis Energy presented the WTE Project as one, which would have emissions substantially less than DEQ and EPA's requirements. However, Dynamis Energy has now requested that DEQ modify its existing air quality requirements in order for Dynamis Energy to be able to ensure its compliance. Without greater data and information from Dynamis Energy, it is our belief that Dynamis Energy's attempt to modify the emission standards should be declined because it is unsupported. It is unclear from the Dynamis Energy *Siting Plan Application* whether Dynamis Energy will be required to post a performance bond in order to ensure their compliance with existing regulations and standards.

³ It is our understanding that Idaho Power neither needs, nor is interested in purchasing, the power which will supposedly result from the WTE Project. Dynamis Energy has provided no documentation that the WTE Project is in fact economically viable.

