



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 NORTH HILTON, BOISE, ID 83706 • (208) 373-0502

C. L. "BUTCH" OTTER, GOVERNOR  
CURT FRANSEN, DIRECTOR

November 16, 2012

**VIA EMAIL**

C. Lloyd Mahaffey, Chairman & CEO  
Dynamis Energy, LLC  
776 E. Riverside Dr., Suite 150  
Eagle, ID 83616

RE: Facility ID No. 001-00252, Dynamis Energy, LLC, Boise  
Potential to Emit Mercury Emissions

Dear Mr. Mahaffey

Based upon our review of all application materials submitted by Dynamis Energy, LLC (Dynamis) for its proposed waste-to-energy facility, DEQ has determined that the potential to emit mercury emissions is greater than the annual mercury emission threshold of 25 pounds for new or modified sources. Therefore, DEQ requires an MBACT analysis in accordance with IDAPA 58.01.01.215, Rules for the Control of Air Pollution in Idaho, or a demonstration of the method or methods that will be used to limit potential annual mercury emissions to less than 25 pounds.

In addition, DEQ requests that Dynamis explain the difference in the thermal conversion unit exhaust flow rate between Dynamis' modeled flow rate of 150,865 acfm and the projected exhaust flow using EPA F-Factor methodology, which predicts an exhaust flow rate of approximately 93,000 acfm.

DEQ would also like to clarify that compliance with the dioxin/furan emission limit in 40 CFR 60 Subpart Eb should be demonstrated by summing the total mass of tetra- through octa- chlorinated dibenzo-p-dioxins and dibenzofurans, rather than the toxicity equivalent (TEQ) value provided in the emission inventory. DEQ also requests that Dynamis provide the source of information used to determine the de novo synthesis formation of dioxin/furan.

Until these issues are resolved, DEQ cannot issue a draft permit to construct to Dynamis.

If you have any questions about this notification, please contact Morrie Lewis at (208) 373-0502 or Bill Rogers at (208) 373-0437.

Sincerely,

Mike Simon  
Stationary Source Manager  
Air Quality Division

Permit No. P-2012.0022 PROJ 61033