DYNAMIS ENERGY™

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Eagle, ID 83616

December 14, 2012

Via Email

Mr. Morrie Lewis, Permit Writer
Department of Environmental Quality
Air Quality Division
1410 North Hilton
Boise, Idaho 83706-1255

Re: Facility ID No. 001-00252, Dynamis Energy, LLC, Boise
Permit to Construct Application, Revised Modeling Analysis and MBACT Analysis
Ada County Landfill Waste To Energy Facility

On April 25, 2012, Dynamis Energy, LLC (Dynamis) submitted to the Department of Environmental Quality (DEQ) a permit to construct application for a waste-to-energy project to be located at Hidden Hollow Landfill in Ada County. Since that time, several submittals have been made to DEQ in response to requests for additional information and as the result of various meeting and discussions between Dynamis and DEQ. Most recently, Dynamis met with DEQ to discuss emission factor development and emissions inventory calculations as well as F-Factor and system exhaust flow calculations. Mercury emissions were also discussed during these meetings as well.

Preliminary responses to the F-Factor/system exhaust flow calculations and mercury emissions were submitted to DEQ via letters dated December 3, 2012 and November 28, 2012, respectively. Re-evaluation of F-Factors and corresponding exhaust flows prompted Dynamis to consider waste composition scenarios that would result in 'worst case' emission conditions. One such scenario is where all tire processing would occur during off-peak operation. As a result, separate emissions factors were developed for the peak and off-peak operating scenarios, and revised emissions were calculated to represent these conditions. A revised modeling analysis to represent a 'worst case' scenario was conducted, where maximum emission rates were combined with the lowest system exhaust flow rates. A Modeling Report documenting the modeling methodology and model results is included with this letter (model files are included electronically on CD).

DEQ has also expressed concerns regarding mercury emissions from the Dynamis facility. We are confident that emissions of mercury from the Dynamis Energy facility will fall below the IDAPA 58.01.01.215 MBACT threshold without the necessity of additional controls, other than those already proposed for acid gas and particulate matter control. Having said that, after substantial delays, in order to complete the permitting process in a timely manner, Dynamis has completed an MBACT analysis, which is included with this letter. Dynamis will also install a sorbent type monitoring/sampling system to monitor mercury emissions from the system. Information on this monitor is included with this letter. This technology is considered the best-proven technology to measure mercury.

It is our hope that the submittal of these documents will provide DEQ with an ability to confirm that adequate safeguards are in place to address worst case operating scenarios and provide DEQ all information needed so that the draft permit can be issued.

Pursuant to IDAPA 58.01.01.123, I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this letter and attachments are true, accurate, and complete.

Please do not hesitate to contact me or Shannon Manoulian, JBR (208.853.0883) with any questions or concerns.

Sincerely,

Dynamis Energy, LLC

Christopher Durand, P.E.
Senior Mechanical Engineer

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Enclosures

cc: Shannon Manoulian, JBR
C. Lloyd Mahaffey, CEO
Wade Thomas, SVP, Legal and Finance
Michael Bogert, Parson Behle