



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706 • (208) 373-0550

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

June 19, 2012

**CERTIFIED MAIL NO. 7009 0820 0000 2799 9345
RETURN RECEIPT REQUESTED**

Doyle Pergande, P.E.
Dynamis Energy, LLC
776 E. Riverside Drive, Ste. 150
Eagle, ID 83616

Re: Non-Municipal Solid Waste Management Facility Design Plan Approval Application
Proposed Renewable Energy Project Located At Ada County Landfill
DEQ Comments

Dear Mr. Pergande:

On May 18, 2012, the Department of Environmental Quality (Department) received the Design Plans for the above referenced facility located within Ada County, Idaho. The Department has reviewed this submittal in accordance with the requirements of IDAPA 58.01.06 Solid Waste Management Rules. The Department finds the application is incomplete, and in accordance with Section 58.01.06.032.03 this letter, hereby notifies Dynamis Energy, LLC the application is incomplete. Dynamis Energy, LLC may submit additional information in the form of an amended application, withdraw the application, or request a conference to discuss the Department's determination. The basis for our finding the application is incomplete is outlined below.

PROPOSED RENEWABLE ENERGY PROJECT AT HIDDEN HOLLOW LANDFILL

General

Cover Letter First paragraph, first sentence. Please change Hidden Springs Landfill to Hidden Hollow Landfill.

First paragraph, fourth sentence. Dynamis states the site was created by removing earth used to cap MSW in the landfill. Please clarify whether the facility is constructed over in-place waste.

Second Paragraph, third sentence. Dynamis has stated in the siting application that an additional 6 tons per day of tire will also be processed. Please make changes as necessary.

Non-Municipal Solid Waste Design Plan Approval Application

- Section I Page 5. The breakdown of composition of waste material should reflect the amounts presented in the siting application (408 tons per day of MSW and 12,000 pounds per day of tires). Please make changes as necessary.
- Section II Subsection II.01. As stipulated in the directions, a specific reference to document name, page number, etc. should be provided. With the layout of your submittal, it should be chapter or divider number, document name, page or drawing number(s). Please make changes as necessary.

Chapter 3

- Page 1 Leachate Collection System. Second paragraph. The County is currently exceeding their leachate storage pond capacity. Therefore, this option is not available at the current time. Please make changes as necessary.

Chapter 4

- General All design drawings must bear the stamp, date, and signature of a professional engineer registered in the State of Idaho. Please make changes as necessary.
- Drawing a2.11 Unacceptable and hazardous waste material should be provided leak proof storage containers and secondary containment to prevent runoff into the general municipal solid waste handling areas.
- Drawing 1102-01-S-1002200 Civil site plan is illegible. Please make changes as necessary so information is of suitable clarity for review.
- Section A cut line is not identified in the plan view. Please make changes as necessary.
- Drawing 1102-10-P-1002104 General. Ductile Iron pipe is called out for the leachate drainage system under the building. However, there is no provision for secondary containment which is critical for groundwater protection and also allows for leak monitoring of the annular space. Please provide or submit a

detailed justification as to why secondary containment cannot be provided.

Note F. Please provide material specifications for type of pipe joints and interior coating (suitable for chemical resistance of leachate) of Ductile Iron Pipe. Specification should include a pressure testing procedure.

Note I. The outlet assembly of the tank should also be plugged with a water tight assembly. Please make changes as necessary.

It appears there is a drain sump in the ash storage room that is connected to the storage tank. Please verify. Will there be a potential for ash or ash slurry to co-mingle with MSW leachate? If so, will the ash be characterized prior to disposal? If liquid from the ash is mixed with the MSW leachate, the ash should be characterized prior to placement in the ash storage area. If the ash characterizes as a HW, the liquid could also be hazardous waste. When mixed with the MSW leachate, the entire volume of mixed liquid would be a hazardous waste.

Storage tank must be leak tested prior to use. Please provide specifications for the tank including leak testing protocol.

Drawing 1102-04-F-1002038

Final design details need to be submitted for the Sump/lift station including details and specifications for liquid level control, remote alarms, and hydraulic testing requirements.

Please provide a piping schedule for the leachate collection system piping including a list of materials, linings, fitting type, etc.

Drawing p1.3

Keyed Note 1. Where is civil site plan referenced?

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Enlarged Waste and Vent Plan. Please reference plan sheet for the continuation of drainfield piping from the building to the drainfield.

If you have any questions or comments, please call me at 373-0599.

Sincerely,



Jack Gantz, P.E.
Technical I Engineer

c: Mike Reno, EHS – CDHD

ec: Dean Ehlert, DEQ State Office
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