

Jack Gantz

From: tcockroft@ctcweb.net
Sent: Thursday, March 22, 2012 2:28 PM
To: Jack Gantz
Subject: [Fwd: Comments on Dynamis Site Plan for "Waste-toEnergy Facility"]
Attachments: Public Comments on Dynamis Site Plan Applicatin.docx

----- Original Message -----

Subject: Comments on Dynamis Site Plan for "Waste-toEnergy Facility"
From: tcockroft@ctcweb.net
Date: Thu, March 22, 2012 2:26 pm
To: joak.gantz@DEQ.Idaho.gov
Cc: hsta@hiddensprings.com
bocc1@adaweb.net
thutchinson@adaweb.net

Mr Gantz,

Thanks for the opportunity to comment on the waste-to-energy proposal from Dynamis Energy,

And thanks for your rapid response(s) to my telephone queries . My comments are attached.

Tim Cockroft
4401 W Long Meadow Dr
Boise, ID 83714
208-229-3045

4401 W Long Meadow Drive
Boise, ID 83714-5048
March 22, 2012

Department of Environmental Quality
Boise Regional Office
1445 N Orchard
Boise, ID 83706

Attn: Jack Gantz

Re: Public Comments on Dynamis Energy LLC Waste to Energy Site Plan Application

- 1) Per the legal notice published in the Idaho Statesman on March 12, 2012, Dynamis has applied for a site permit to combust 408 tons per day of solid municipal waste. Per Dynamis' site application, they propose to combust 408 tons per day, and, 12,000 pounds (6 tons) of tires per day. That indicates that the application ought to be for a permit to process 414 tons per day, suggesting that the application is inaccurate, and should be disallowed, or, modified to indicate the total daily tonnage to be combusted.
- 2) Per supporting application documentation for loads housed and processed in the facility, STRATA (Tab 7, page 3) assumes that Dynamis will process 5 to 325 tons per 12 hour period within the facility. STRATA's assumptions equate to only 78.5% of Dynamis' stated daily total of 414 combustible tons. In addition, Dynamis proposes to stockpile 1224 tons per week for combustion when MSW deliveries aren't made on weekends and holidays. Dynamis/STRATA need to be apprised of the discrepancies, and examine and correct/verify the design rationale for daily/weekly site loads housed and processed at the facility.
- 3) Per supporting documentation, the application includes a letter (June 30, 2010 – Commissioners Office to Mahaffey) from Ada County Commissioners Office, indicating a preliminary commitment to a 250 ton per day operation. That letter does not support combustion of 408 ton per day of MSW, plus 12,000 pounds per day of tires,
- 4) The application has no data on the septic field delineated in the plan, or the contents of discharges to it.
- 5) The application does not indicate traffic required to dispose of primary combustion ash, syn-fuel combustion residues, and cooling tower residues, nor the destinations of the vehicles involved.
- 6) Do 40 CRF 258 requirements regarding distances from adjacent properties apply to this application? If so, does the applicant comply? The facility will receive MSW and tires with clear title. Although possession and ownership of MSW are defined, is it still MSW when Dynamis takes possession? Because the the residuals from combustion will be deposited in Ada County-owned landfills, are by-products considered to be MSW? If so, at what point, if ever, does title to the residuals from combusted materials revert to Ada County, or, is future liability limited to Dynamis?

Thank you for the opportunity to comment on the potential facility site plan. I'll have more to contribute when the air quality portion of public comments is open.

Sincerely,

Timothy L Cockroft

CC: hsta@hiddensprings.com
bocc1@adaweb.net
thutchinson@adaweb.net