

EXHIBIT D

EXHIBIT D

From_PMohn2Fourie_Sep3_10.txt

From: Patrick Mohn
Sent: Friday, September 03, 2010 9:17 AM
To: 'Fourie, Gabrielle' (GFourie@SCSEngineers.com)
Cc: Larry Kennedy
Subject: Provisions for CO emissions CAP in Lockwood Application

Gabrielle,

As we discussed on the phone today, these are some general guidelines for what Refuse, Inc. will need to include in the EMISSION CAP portion of the Class I-B application:

-Basically, the EMISSIONS CAP portion of the application must be a totally self-contained section, with testing, monitoring, recordkeeping, and reporting provisions written so that they are not cross-referenced to provisions in other parts of the air quality permit.

-Overall, compliance with the facility-wide CO cap should be based on the calculation of 12-month rolling actual emissions of CO from the facility. In addition, I envision that the bulk of the testing, monitoring, recordkeeping, and reporting provisions will involve the candlestick flare and the three new LFG engines, as most of the PTE for CO will be associated with these units.

-Provisions for the calculation of the facility-wide 12-month rolling emissions of CO on a monthly basis.

-Provisions for the reporting of the monthly, 12-month rolling emissions of CO to the NBAPC on a quarterly basis.

-Provisions that the 12-month rolling calculations for CO will be based on source testing and/or measurable properties of the LFG and quantifiable operational parameters. The source testing and/or measurable properties of the LFG and monitored operational parameters, must show a correlation with CO emissions.

-Provisions for an adequate frequency of source testing to enable meaningful 12-month rolling emissions calculations.

-Provisions for the adequate frequency of measurement of LFG properties and operational parameters to enable meaningful 12-month rolling emissions calculations to be made.

-Provisions for monitoring of operational parameters (examples are fuel flow rates, fuel heating value, etc.).

-Provisions for how operational parameters and LFG properties are going to be monitored (examples - what measurement devices will be installed, calibrated, and used for monitoring on each CO-emitting unit; what analytical techniques are going to be used for measurement of LFG properties).

-BMP's for maintenance and operation of the measurement devices.

-Supporting documentation that may include engineering designs of the flare and the 3 LFG engines. Also, details of how the PTE for the flare was originally calculated would be helpful to evaluate Refuse, Inc.'s proposed cap provisions. Since emissions verification for open flares isn't possible, Refuse, Inc. will have to specify monitoring provisions that utilize those elements of their design and operation relating to the best possible control of CO emissions.

-In general, the NDEP will not accept default control efficiencies, AP-42 emission factors, or manufacturer's guarantees for calculating 12-month rolling emissions for demonstrating compliance with emissions caps. Basically, Refuse, Inc. will

From_PMohn2Fourie_Sep3_10.txt

have to provide a tangible demonstration that the operational parameters measured will correlate with actual CO emissions from the CO-emitting units at the facility.

- We advise applicants that having a cap in a permit carries with it requirements for extensive testing, monitoring, recordkeeping, and reporting. Given that Refuse, Inc. is requesting a CO cap to be a synthetic minor for PSD, carrying out these requirements diligently will be important for Refuse, Inc. to do.

These are general guidelines that should be helpful to you, and it appears, based on our discussion this morning, that you've already thought about many of these items and issues.

Regards,

Pat

Pat Mohn, P.E.
Bureau of Air Pollution Control
Nevada Division of Environmental Protection
901 S. Stewart St., Ste 4001
Carson City NV 89701
p: 775.687.9345 f: 775.687.6396
www.ndep.nv.gov