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DIVISION OF AIR  
RESOURCE MANAGEMENT

June 15, 2012

Mr. David Read, Project Engineer  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**HAND DELIVERED**

Re: Draft Air Permit No. 0951340-001-AC (PSD-FL-418)  
RCID Comments re: Harvest Energy Garden – Orlando  
Biogas-to-Energy and Fertilizer Project

Dear Mr. Read:

On behalf of Reedy Creek Improvement District (RCID), the following comments are offered regarding the Florida Department of Environmental Protection's issuance of Draft Air Permit No. 0951340-001-AC (PSD-FL-418). RCID appreciates the Department's review and approval of this important recycling project.


- (1) Lack of Common Control: For the record, RCID disagrees with the Department's conclusion that RCID and the Harvest Energy Garden are under "common control." As explained in detail in Harvest's application and additional information, RCID and Harvest do not share any common ownership and, more importantly, RCID has no authority to direct or oversee Harvest's operations or ensure compliance with environmental requirements. Furthermore, this project will provide less than 1% of the RCID's annual power needs and is actually displacing power that RCID would normally have purchased from other large power producers in the State. Nonetheless, RCID appreciates the Department's stated intention to issue Harvest a PSD and Title V Permit separate from RCID.
- (2) Separate Title V Permitting: On page 7 of 28 of the Technical Evaluation and Preliminary Determination (TEPD), the Department states that it "intends to issue to Harvest Power Orlando, LLC a separate PSD air construction permit to build the proposed plant and, eventually, a separate Title V air permit to operate the plant." RCID appreciates this intention, given the separateness of Harvest Power and RCID, and requests that this language be expressly included in Condition 8 of Section 2—Administrative Requirements, which specifies Harvest Power's obligation to obtain a Title V permit.

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- (3) In Section 1.1 of the TEPD, Facility Description and Location, please revise the second sentence as follows:
- Harvest Power, Inc., doing business as Harvest Energy Orlando, LLC, is proposing to construct a facility, Harvest Energy Garden – Orlando, adjacent to the Reedy Creek Improvement District Wastewater Treatment Facility in Orange County at 2151 Bear Island Road in Lake Buena Vista, Florida.
- (4) In Section 1.2 of the TEPD, Project Description, please revise the fourth sentence as follows:
- Walt Disney World will provide much of the raw waste materials and Reedy Creek Improvement District will purchase the electricity ~~through its Reedy Creek Utilities.~~

If you have any questions regarding these comments, or wish to discuss this matter further, please contact me at (850)425-2263.

Sincerely,



Robert A. Manning  
Attorney for Reedy Creek Improvement District

RAM/loh

Cc: Jeff Koerner, DEP  
Bill Warren, RCID  
Gregg Harkness, RCES  
Armando Rodriguez, Walt Disney World