

Derenzo and Associates, Inc.

Environmental Consultants

November 9, 2006

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BUREAU OF AIR REGULATION

Mr. Jeff Koerner
Bureau of Air Regulation
Division of Air Resource Management
Department of Environmental Protection
STATE OF FLORIDA
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Subject: Trail Ridge Energy, L.L.C.
DEP File No. 0310358-004-AC.(PSD-FL-374)
Public Notice Draft Permit Comments

Dear Mr. Koerner:

Derenzo and Associates, Inc. (Derenzo and Associates), on behalf of Trail Ridge Energy, L.L.C (trail Ridge Energy), is submitting to the Florida Department of Environmental Protection, Division of Air Resource Management (FDEP-DARM) comments on the draft Air Construction Permit recently issued by the regulatory agency for a new landfill gas (LFG) fueled internal combustion (IC) engine electricity generation facility at the Trail Ridge Landfill in Duval County Florida.

SECTION III – EMISSION UNIT(S) SPECIFIC CONDITIONS

A. FUEL SPECIFICATIONS AND WORK PRACTICES

Condition 1 specifies that the power generation rating of 2,233 bhp is based on a minimum fuel heating value requirement of 467 BTU/scf and landfill gas usage of 580 scfm per engine. The reference should include a reference to higher heating value (HHV).

C. TEST METHODS AND PROCEDURES

Condition 2(d) specifies that *EPA Method 18 – Measurements of Gaseous Organic Compounds Emissions* shall be used to demonstrate compliance with the engine VOC emission limit and that *No other test methods may be used for compliance testing unless prior DEP approval is received, in writing from the department.* EPA Method 25 and 25C should be included as approved procedures for the VOC emission compliance demonstration (i.e., Method 25C; Method 25 and/or Method18).

Derenzo and Associates and Trail Ridge Energy appreciate FDEP-DARM consideration of the comments and requested permit modifications that are presented in this document

Derenzo and Associates, Inc.

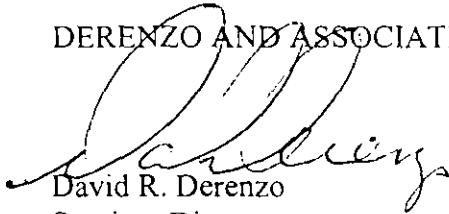
Mr. Jeff Koerner
FDEP-DARM

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Please contact us if you have questions or require clarifications

Sincerely,

DERENZO AND ASSOCIATES, INC.



David R. Derenzo
Services Director

c: Bill Owen, Trail Ridge Energy
Mike Laframboise, Trail Ridge Energy
Syed Arif, FDEP-DARM