

CERTIFIED MAIL

December 21, 2006

Mr. Manny Aquitania
Permits Office, Air Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

**Re: *Comments on Final Title V Operating Permit
Tri-Cities Landfill Energy Facility
Permit # SR-ROP 05-03***

Dear Mr. Aquitania:

The purpose of this letter is to provide comments on the Final Title V Operating Permit and request additional clarification on permit requirements, as described in detail below.

Permit Condition II.C.1

The permit requires that the Tri-Cities Landfill Energy Facility (TCLEF) conduct quarterly monitoring of the carbon monoxide and oxygen concentration from ENG1, ENG2, ENG3, and TO1 using a portable carbon monoxide analyzer. While this permit condition does not explicitly state where the sample should be taken from, Salt River Project (SRP) intends to take the samples at the test port location in the stack. However, in order to avoid renting equipment that would be required to sample at this height, SRP is proposing a different sampling method in which a pipe is run from the inside of the stack out through the test port down to the ground where the measurement will be taken (refer to Figure 1 attached). It is important to note that the portable analyzer does create a suctioning effect that will pull exhaust gas through the sampling tube. Therefore, the concentration measurements should be the same at either sampling location.

Permit Condition II.C.6.a

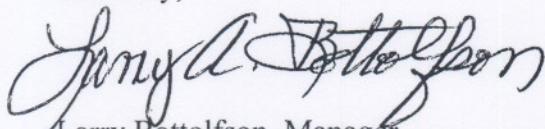
In your response to our comments in a letter dated November 30, 2006, you indicated that any testing occurring at the Tri-Cities Landfill Energy Facility (TCLEF) is being done in conjunction with the requirements of the Tri-Cities Landfill Part 71 permit, and that any changes to such testing must be made with respect to that permit. This statement appears to indicate that Salt River Project (SRP) has an obligation to ensure that the Tri-Cities Landfill complies with its testing requirements. SRP is only responsible for testing as required in its Title V permit, and should not be held accountable for ensuring that another facility outside of SRP's authority comply with the requirements of their permit. Please clarify your original statement.

Mr. Manny Aquitania
December 21, 2006
Page 2 of 2

Also, SRP noted that the new permit condition requires that follow up emission tests be conducted on a monthly basis until compliance is demonstrated if the initial emissions test does not demonstrate compliance. However, Permit Condition III.A.1 requires that a test plan be submitted 45 days prior to any required testing. As such, if SRP is required to conduct follow-up testing, it will be impossible to comply with both permit conditions. Please clarify how SRP is to proceed in this situation.

Please contact Barbara Sprungl at (602) 236-5374 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry A. Bottolfson". The signature is written in a cursive, flowing style.

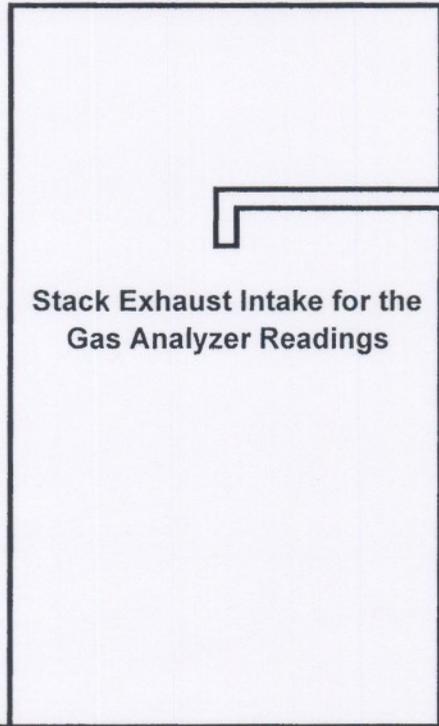
Larry Bottolfson, Manager
Tri-Cities Landfill Energy Facility

cc: Ted Hawley
Barbara Sprungl

Attachment

LOC 30-6-1

Stack Exhaust Exit



Test Port

**Stack Exhaust Intake for the
Gas Analyzer Readings**

**Gas Analyzer Sampling
Location**