

EXHIBIT C

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larry kennedy

From: larry kennedy
Sent: Friday, August 27, 2010 4:27 PM
To: 'Fourie, Gabrielle'
Subject: RE: Class 1-B Significant Revision (AP4953-1148) - Lockwood Landfill

Gabrielle,

Following up on my voice mail – first of all my apologies for the surprise in the mail. In brief, we will be willing to allow the application to be submitted (resubmitted) without a model as long as the modeling protocol is complete.

As I explained in my voice mail message we generally can get started processing applications without a model as long as the modeling protocol is complete or nearly so. Unfortunately the current application to revise the permit re the flare & generators centers on the emission factors & other information embodied in the modeling protocol, and we can't do much without that information.

The application also lacked other documentation required of major sources, such as an additional hardcopy of the application plus a PDF of the entire application on CD. Pls be aware of other issues (some related to the need for a complete modeling protocol) that would cause us to at least "stop the clock" in the future, we foresee that this has the makings of a difficult application :

- draft conditions for monitoring and recordkeeping to demonstrate compliance with the proposed emissions cap were not provided as required by our regs. Coming up with adequate draft permit conditions to ensure compliance with the requested facility-wide emissions cap of 249 tpy of CO will be a major task.
- the applicability of the new LFGTE engines under Part 60, Subpart WWW [which requires compliant control efficiency for NMOCS] or the NESHAP for MSWGs [Part 63, Subpart AAAA]. This ties into the allowable permit emission rates, which tie into the modeling.
- PSD increment modeling will be required and may be time-consuming

Regards,

Larry

Lawrence Kennedy, P.E.

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From: Fourie, Gabrielle [mailto:GFourie@SCSEngineers.com]
Sent: Thursday, August 26, 2010 11:32 AM
To: larry kennedy
Subject: Class 1-B Significant Revision (AP4953-1148) - Lockwood Landfill

Good afternoon Mr. Kennedy,

We recently received an incomplete letter application for the Class 1-B Significant Revision (AP4953-1148) for the Lockwood Landfill (dated August 24). We had noted that the modeling analysis would be submitted under separate cover (note that a separate firm completes the modeling analysis). It was returned and noted that the modeling analysis be included in the application that we re-submit to the agency. Is there any way that you could move the application forward with the submittal of the modeling protocol? When we submitted the application for the new candlestick flare at Lockwood, you were able to process the application while the modeling was ongoing. We were hoping that perhaps you would consider this again once the modeling protocol has been submitted to NDEP.

Thanks,
Gabrielle

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