

**Temporary Covered Source Permit (CSP) No. 0010-01-CT Review**  
**Application for Renewal/Modification No. 0010-11**

**Applicant:** Jas. W. Glover, Ltd.

**Equipment Description:**

**240 tph Asphalt Concrete (AC) Plant (fixed)**

1. 240 tph Stansteel rotary drum dryer (model no. RM60, serial no. 4159, max. 96.8 MMBtu/hr heat input);
2. **635 kW Caterpillar diesel engine generator (DEG) (model no. 3412, serial no. 2WJ01178, max. 45.5 gph fuel input);**
3. Enclosed gradation screen;
4. Hot storage bins;
5. Weigh hopper;
6. Enclosed pugmill;
7. Enterprises asphalt hot oil heater (model no. CEI-2000, serial no. H120697, max. 20 gph fuel oil no. 2);
8. Enterprises asphalt hot oil heater (model no. CEI-2000, serial no. 099-023, max. 20 gph fuel oil no. 2);
9. Stansteel 10' diameter cyclone (model no. 10", serial no. 414, max. 48,000 acfm); and
10. Stansteel baghouse (model no. AB448-15, serial no. 4158, max. 48,000 acfm).

**110 tph AC Plant (fixed)**

1. 110 tph Stansteel rotary drum dryer (model no. 4000 RM, serial no. 154, max. 47.95 MMBtu/hr);
2. Enclosed gradation screen;
3. Hot storage bins;
4. Weigh hopper;
5. Enclosed pugmill;
6. Joy multicyclone (model no. 19011-4, serial no. not available); and
7. Joy venturi scrubber (model no. 48/28 type V, serial no. not available).

Note: The CEI-2000 Enterprises hot oil heaters mentioned above are used for this plant also.

**1,000 tph Stone Processing Plant (fixed)**

1. 1,000 tph Telsmith primary jaw crusher (model no. PP / VGF4448, serial no. 2529);
2. 4' Symons secondary cone crusher (model no. 4' Standard, serial no. 4495);
3. 265 tph 22" x 36" Cedarapids secondary jaw crusher (serial no. 43372);
4. 4' Nordberg tertiary cone crusher (model no. 48", serial no. 48-GD-172);
5. Cimco tertiary crusher (model no. 54" VSI, serial no. 115-EH);
6. One (1) two-deck primary screen (model no. 280-HF, serial no. 323M22447H);
7. Two (2) 5' x 14' Symons three-deck secondary screens (model no. F-60, serial no. 514-47);
8. Various conveyors; and
9. Waterspray system

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660 tph Stone Processing Plant (temporary/portable located at a site other than Hilo facility)

1. 660 tph 30" x 42" Cedarapids primary jaw crusher (model no. 293, serial no. 43122);
2. 4' Symons secondary cone crusher (model no. 4' Standard, serial no. J7399);
3. Cedarapids grizzly feeder;
4. Screens;
5. Various conveyors;
6. Waterspray system; and
7. 505 BHP (350 kW) Cummins DEG (model no. KTA-1150-G, serial no. 31107723, max. 25 gph fuel input)

Back-up DEGs

1. 500 kW Caterpillar DEG (model no. D348, serial no. 36U2499, max. 35.5 gph fuel input);
2. 939 HP Caterpillar DEG (model no. D398, serial no. 066B01057, max. 51.8 gal/hr fuel);
3. 676 HP Caterpillar DEG (model no. 3412, serial no. 38S09660, max. 35.6 fuel input);
4. **1,085 HP Cummins DEG (model no. QST30G2, serial no. 1030542477, max. 53 gph fuel input);** and
5. **620 HP Cummins DEG (model no. KTA-19-G3, serial no. 31127905, max. 29.3 gal/hr fuel input)**

\*The three (3) DEGs in **bold** may operate simultaneously (with hour/fuel limitations) and may be replaced with a DEG of equal size or smaller and similar stack parameters.

**Equipment Locations:**

Jas. W. Glover, Ltd.  
890 Leilani Street  
Hilo, Hawaii 96720 (Big Island)  
UTM Coordinates: 284,219m E; 2,180,592m N (NAD-83)

660 tph Stone Processing Plant

TMK (4) 2-9-3:4, Mahaulepu Quarry, Kauai

**Responsible Official:**

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**Mailing Address:**

See Hilo address above.

**Proposed Project:**

This facility consists of eight (8) activities:

1. 240 tph AC plant;
2. 110 tph AC plant;
3. 1,000 tph stone processing plant;
4. 660 tph stone processing plant (temporary/portable currently on Kauai);
5. 60 cy/hr concrete batch plant (NSP No. 0010-05-N);
6. 60 cy/hr concrete batch plant (grandfathered and will be demolished);
7. 200 cy/hr concrete batch plant (NSP No. 0010-10-N); and
8. Hollow tile plant (NSP No. 0010-02-N)

However, this covered source permit will only include activities 1 through 4 since other activities are either permitted separately or grandfathered. Activities 5 through 8 have different Standard Industrial Classification Codes (SICC) from Activities 1 through 4 and are not one of the major source categories nor subject to NSPS/NESHAPS. Thus, the air pollutant emissions from activities 5 through 8 (all fugitive) were not considered for major source determination. Since the stone processing plants 'support' the AC plants with more than 50% of the produced aggregate, the SICC for activities 1 through 4 as a whole is SICC 2951 - Asphalt Paving Mixtures and Blocks. If more than 50% of the produced aggregate were sold off-site, then they would be considered two different activities.

A new ambient air quality analysis was conducted for Jas. Glover to include the added back-up DEGs and the 150 kW DEG (permitted by 0010-10-N).

The following are descriptions of activities 1 through 4:

1. 240 tph AC plant

This 240 tph AC plant was constructed in 10/25/93 and began operations in 1/95. The 240 tph AC plant is subject to NSPS Subpart I since it was constructed after 6/11/73 (trigger date).

The description of processes are as follows:

Cold (unheated) aggregates are conveyed to the rotary drum dryer, which is fueled by fuel oil no. 2. The hot aggregates are lifted via the hot elevator to the screen and bins. The weigh hopper controls the aggregate quantity to be combined with the hot asphalt in the pug mill. The asphalt heater is also fueled by fuel oil no. 2. The asphalt hot-mix is mixed in the pug mill and then discharged onto a waiting truck. Particulates are removed by a cyclone and baghouse. Electrical power is provided by a DEG. This AC plant was intended to replace the existing 110 tph AC plant, yet both AC plants continue to operate. Since both plants share the same feeder, they cannot operate simultaneously with one another. The hour limitation is 2,400 hours in any rolling 12-month period.

2. 110 tph AC plant

This 110 tph AC plant was constructed and began operations prior to 3/20/72 with no modifications since then. Therefore, this plant is exempt from NSPS Subpart I requirements.

The description of processes are similar to the 240 tph AC plant except that electric power may be provided by Hawaii Electric Light Company (HELCO) and that cold mix asphalt may also be processed. This permit application requested to use the same DEGs that power the 240 tph AC plant. Particulates are removed by a multicyclone and venturi scrubber. As mentioned above, due to physical limitations the AC plants may not operate simultaneously with one another. Otherwise, this AC plant may operate continuously with no limit.

3. 1,000 tph stone processing plant

The original stone processing plant was constructed and operated in the late 1940's. On 3/29/96, the primary crusher was damaged and replaced with a similar sized crusher. Since the primary crusher was constructed after 8/31/83 (trigger date) and the capacity is greater than 25 tph (for a fixed plant), NSPS Subpart OOO is now applicable to the initial crusher only.

The description of processes is as follows:

Raw material is transported within the existing quarry and loaded into a hopper. The hopper then feeds the primary jaw crusher which crushes the material down to 4" - 8". The material is conveyed to a surge pile which feeds the secondary crusher. The material is screened and processed through the secondary and tertiary crushers until the desired size is produced. The final product is then stockpiled until it is used for the on-site AC plants, concrete batch plants, hollow tile plant, or transported off-site. Electrical power is supplied by HELCO, but may be powered by one of the back-up DEGs in the future. Watersprays are located at all transfer points and water trucks are used throughout the facility. The hour limitation is 6,000 hours in any rolling 12-month period.

4. 660 tph stone processing plant

This 660 tph plant has been operating since 1992. Since the primary crusher was constructed after 8/31/83 and the capacity is greater than 150 tph (for a portable plant), NSPS Subpart OOO is applicable.

The process description is similar to the 1,000 tph stone processing facility above except that this 660 tph plant is much smaller and electrical power is provided by a 350 kW DEG. This 660 tph plant is also portable and may be transferred to other sites. The hour limitation is 1,920 hours in any rolling 12-month period.

The applicant proposed the following modifications for this facility:

1. Add two DEGs (620 BHP and 1,085 BHP) as back-up to any of the AC or stone processing plants. These DEGs may provide power in lieu of HELCO;
2. Include a 2,400 hr/yr limit on both AC plants combined to remain below major source thresholds;
3. Revised the pressure drop limits to 2-5 inches of water for the baghouse servicing the 240 tph AC plant; and
4. Per telephone conversation with Jim Morrow and Corey Shibata of DOH on 5/10/06, the 660 tph portable stone processing plant will never be located at the Hilo facility. Therefore, with this new permit condition, the total potential emissions at the Hilo facility will fall below major source thresholds. See **Table 2**.

This facility is located near Hilo Airport and in a quarry that is surrounded by gradual sloping land. Some businesses and residential homes are nearby. See **ENCLOSURE 2** for site pictures.

This permit review is based on the application dated December 30, 2003, and its revisions dated June 13, 2005; February 7 and 9, and April 18, 2006. A check for \$500.00 has been processed for a Renewal of a Non-Major Covered Source Permit Application. CSP No. 0010-01-C dated July 27, 1999 will be superseded, in its entirety, upon issuance of this renewal.

**Applicable Requirements:**

The 240 tph AC plant is subject to NSPS, specifically 40 CFR Part 60 Subpart I - Standards of Performance for Hot Mix Asphalt Facilities because this facility has been constructed after June 11, 1973. However, the 110 tph AC plant is not subject to NSPS Subpart I because it was constructed and began operations prior to 3/20/72 with no modifications thereafter.

The 660 stone processing plant and only the initial crusher of the 1,000 tph stone plant are subject to NSPS, specifically 40 CFR Part 60 Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants because the facilities have been constructed or modified after August 31, 1983, and the initial crushers have the capacity to process over 150 tph for the portable plant (660 tph plant) and over 25 tph for the fixed plant (1,000 tph plant).

- Hawaii Administrative Rules (HAR) Title 11 Chapter 59
- Hawaii Administrative Rules (HAR) Title 11 Chapter 60.1
  - Subchapter 1 - General Requirements
  - Subchapter 2 - General Prohibitions
    - 11-60.1-32 Visible Emissions
    - 11-60.1-33 Fugitive Dust
    - 11-60.1-37 Process Industries
    - 11-60.1-38 Sulfur Oxides From Fuel Combustion
  - Subchapter 5 - Covered Sources
  - Subchapter 6 - Fees for Covered Sources, Sections 111-116
  - Subchapter 8 - Standards of Performance for Stationary Sources
  - Subchapter 10 - Field Citations

This is a Synthetic Minor source since SO<sub>x</sub>, NO<sub>x</sub>, PM, and PM<sub>10</sub> emissions would be greater than 100 tpy (Major Source) if this source was to operate continuously.

**Non-Applicable Requirements:**

40 CFR Part 61 - National Emission Standard for Hazardous Air Pollutants (NESHAPS) because there is no standard for AC and stone processing plants.

40 CFR Part 63 - Maximum Achievable Control Technology (MACT) since the facility is not a major source of hazardous air pollutants (HAPS) emissions (10 tpy of individual or 25 tpy of any combination of HAPS).

Prevention of Significant Deterioration (PSD) since this is not a major stationary source. Based on PSD guidance, the 1,000 tpy and 660 tpy stone plants are 'support facilities' to the AC plants (see **Project Emissions** section). A support facility is defined as one that provides at least 50% of its product material to other activities located on the same/contiguous property. However, this facility is not a major stationary source for PSD review because individual pollutants total under 250 tpy.

Compliance Assurance Monitoring (CAM) is to provide a reasonable assurance that compliance is being achieved with large emissions units that rely on air pollution control device equipment to meet an emissions limit or standard. Pursuant to 40 CFR, Part 64, for CAM to be applicable, the emissions unit must: (1) be located at a major source; (2) be subject to an emissions limit or standard; (3) use a control device to achieve compliance; (4) have potential precontrol emissions that are greater than the major source level [ $>100$  tpy]; and (5) not otherwise be exempt from CAM. CAM is not applicable to the plant since item 1 does not apply.

Consolidated Emissions Reporting Rule (CERR) is not applicable because emissions from the facility are less than reporting levels pursuant to 40 CFR 51, Subpart A (see **Table 1**). However, annual emissions reporting is required for covered sources.

**Table 1  
CERR**

Pollutant	Facility Emissions (tpy)	CERR Triggering Levels (tpy)		Internal Reporting Threshold (tpy)
		1-yr Reporting Cycle (Type A Sources)	3-yr Reporting Cycle (Type B Sources)	
VOC	8.89	≥ 250	≥ 100	≥25
PM	77.04	n/a	n/a	≥25
PM <sub>10</sub> /PM <sub>2.5</sub>	29.29	≥ 250	≥ 100	≥25
NO <sub>x</sub>	88.03	≥ 2,500	≥ 100	≥25
SO <sub>x</sub>	<b>39.32</b>	<b>≥ 2,500</b>	<b>≥ 100</b>	<b>≥25</b>
CO	<b>32.11</b>	<b>≥ 2,500</b>	<b>≥ 1,000</b>	<b>≥250</b>
HAPs (total)	<b>2.26</b>	n/a	n/a	≥5

A Best Available Control Technology (BACT) analysis is required for new sources or modifications to existing sources that would result in a net significant emissions increase as defined in HAR, Section 11-60.1-1. This is a new source with no significant increase in emissions. The two added back-up DEGs emissions combined do not trigger a significant increase alone (see **Table 2**). Furthermore, the added DEGs satisfy BACT since they have NO<sub>x</sub> controls (EPA Tier 2 DEG). Therefore, a BACT review was not performed.

**Insignificant Activities/Exemptions:**

No new insignificant activities/exemptions were proposed.

The following equipment for the 240 tph AC plant are insignificant by HAR 11-60.1-82(f)(1) - storage tanks <40,000 gal:

1. 6,400 gallon fuel tank for the dryer;
2. 5,600 gallon fuel tank for the dryer;
3. 3,900 gallon fuel tank for the DEGs; and
4. 2,900 gallon fuel tank for the hot oil heater.

The following activities at the facility are also insignificant or exempt accordingly:

1. HAR 11-60.1-82(f)(6) - paint spray booths;
2. HAR 11-60.1-82(g)(1) - welding booths;
3. HAR 11-60.1-82(g)(3) - hand held equipment;
4. HAR 11-60.1-82(g)(10) - mobile internal combustion engines; and
5. HAR 11-60.1-82(g)(14) - wastewater system plumbing vents.

**Alternative Operating Scenarios:**

Temporary replacement of DEG(s) with an equal size or smaller unit with similar stack parameters.

**Project Emissions:**

As mentioned in the **Proposed Project** section, there have been equipment as well as operational changes proposed for the subject facility. Furthermore, the AP-42 emission factors have been updated and the method of calculating particulate emissions from the stone processing equipment was revised. The combination of these changes reduced the total facility emissions dramatically (this facility was previously determined to be a major source). The bulk of the particulate emission decreases could be attributed to the decrease in flow rate of the individual equipment at the 1,000 tph stone processing plant. It was determined that the primary 4'x5' screen's capacity is 159 tph. Therefore, this bottleneck decreased the flow rate down line.

The hour limitations are proposed as follows:

240 tph AC plant and 635 kW DEG	2,400 hr/yr total for both AC plants
110 tph AC plant	(included above)
1,000 tph stone plant	6,000 hr/yr
1,080 HP DEG	106,000 gal/yr (2,000 hr/yr)
620 HP DEG	58,600 gal/yr (2,000 hr/yr)
660 tph stone plant and 350 kW DEG	1,920 hr/yr

The emissions in **Table 2** were calculated using the AP-42 Emission Factors and the hours of operation listed above. For detailed calculations please refer to the application.

**Table 2  
Potential Hilo Facility Emissions**

	<b>240 tph AC Plant <sup>1</sup></b> (tpy)	<b>1,085 HP DEG 2</b> (tpy)	<b>620 HP DEG 3</b> (tpy)	<b>635 kW DEG 4</b> (tpy)	<b>1,000 tph Stone Plant 5</b> (tpy)	<b>Handlg/ Storage/ Unpaved</b> (tpy)	<b>Total</b> (tpy)
<b>SO<sub>2</sub></b>	31.56	3.00	1.66	3.10			39.32
<b>NO<sub>x</sub></b>	36.35	15.07	12.11	24.50			88.03
<b>CO</b>	23.47	0.96	1.18	6.50			32.11
<b>PM</b>	12.69	0.24	0.19	0.53	27.22	36.17	77.04
<b>PM<sub>10</sub></b>	7.8	0.24	0.19	0.44	13.30	7.32	29.29
<b>VOC</b>	7.61	0.36	0.23	0.69			8.89
<b>HAPs</b>	2.23	0.01	0.01	0.01			2.26

Note:

1. 240 tph AC Plant emissions are based on a 2,400 hr/yr limit. The emissions include load out, silo filling, and one hot oil heater operating 8,760 hr/yr.
2. 1,085 HP DEG emissions are based on a 106,000 gal/yr limit.
3. 620 HP DEG emissions are based on a 58,600 gal/yr limit.
4. 635 kW DEG emissions are based on a 2,400 hr/yr limit.
5. 1,000 tph stone processing plant emissions are based on a 6,000 hr/yr limit.

**Table 3  
Potential 660 tph Stone Processing Plant Emissions**

	<b>350 kW DEG</b> (tpy)	<b>660 tph Stone Plant</b> (tpy)	<b>Handlg/ Storage/ Unpaved</b> (tpy)	<b>Total</b> (tpy)
<b>SO<sub>2</sub></b>	1.70			1.7
<b>NO<sub>x</sub></b>	14.97			14.97
<b>CO</b>	3.22			3.22
<b>PM</b>	1.05	21.0	9.07	31.12
<b>PM<sub>10</sub></b>	1.05	7.76	2.92	11.73
<b>VOC</b>	1.19			1.19
<b>HAPs</b>	0.01			

Note: 350 kW DEG and 660 tph stone processing plant emissions are based on a 1,920 hr/yr limit.

The maximum expected PM emission rate for the 240 tph AC plant is 10.08 lb/hr. Therefore, this facility complies with HAR 11-60.1-37 - Process Industries which limits PM emissions to  $E = 4.10 p 0.67 = \underline{161 \text{ lb/hr}}$  (where  $p$  = maximum input of material in tph = 240 tph), but not greater than 40 lb/hr.

**Air Quality Assessment:**

An ambient air quality analysis (AAQA) was performed using an equivalent model, BEE-Line ISCST3 "BEEST" (Version 7.10), to determine source compliance with National and State ambient air quality standards (NAAQS and SAAQS). A new AAQA was required to ensure that the added DEGs plus existing DEGs would meet AAQS. Although the activities are different and are permitted separately, they are owned by the same business on the same location. The model, methodology and assumptions employed in the AAQA have been determined to be consistent with State and Federal guidelines and are discussed below.

The assumptions used in the ISCST3 model included the following: simple and complex terrain impacts, rural dispersion parameters, and regulatory default options. One (1) year of meteorological data (from Hilo Airport, 1995) was used and is representative of the location since the facility abuts the Hilo Airport.

Receptors were placed on a Cartesian grid 30 meters apart. Elevations at each receptor were determined using U.S. Geological Survey (USGS) Digital Elevation Model (DEM) data from the Hilo Quad (1995).

A Good Engineering Practice (GEP) stack height analysis was not performed because the EPA Building Profile Input Program (BPIP) was used to determine the effects of downwash from structures in the vicinity of the DEGs.

**Table 4** presents the potential to emit/allowable emission rates and stack parameters of the DEGs used for the worst case scenario (including NSP No. 0010-10-N). The derivation of SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub> emission rates were previously discussed in the **Project Emissions** subsection. The annual concentrations include fuel and hour limitations. The 150 kW DEG in 0010-10-N will now be limited in order to meet SAAQS in the facility. Pb and H<sub>2</sub>S are assumed to be negligible.

The predicted concentrations are compared to SAAQS shown in **Table 5**. Based on the assumptions used, the AAQA shows compliance with SAAQS and NAAQS for SO<sub>2</sub>, NO<sub>2</sub>, CO, and PM<sub>10</sub>. See **ENCLOSURE 1** for model runs.

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**Table 4  
Source Emission Rates and Stack Parameters for Air Modeling**

SOURCE <sup>1</sup>		EMISSION RATES <sup>2</sup>					STACK PARAMETERS <sup>3</sup>			
Equipment	Stack No.	SO <sub>2</sub> (g/s)	NO <sub>x</sub> (g/s)	CO (g/s)	PM <sub>10</sub> (g/s)	Pb (g/s)	Height (m)	Temp. (K)	Velocity (m/s)	Diameter (m)
635 kW DEG (C3412)		0.324	--	0.682	0.047	0.000	<u>7.62</u>	814.82	46.18	0.25
		0.089	0.528	--	0.013	0.000				
620 HP DEG (400 kW)		0.209	--	0.149	0.024	0.000	<u>7.62</u>	744.26	86.54	0.15
		0.048	0.261	--	0.006	0.000				
1080 HP DEG (800 kW)		0.378	--	0.121	0.030	0.000	<u>14.02</u>	760.93	55.66	0.25
		0.086	0.325	--	0.007	0.000				
150 kW DEG		0.105	--	0.029	0.008	0.000	7.01	784.26	60.80	0.13
		0.042	0.090	--	0.003	0.000				

Note:

1. The listed DEGs will be the permitted worst case scenario. The description in parenthesis was listed in the applicant's BEEST model. The 150 kW DEG is permitted by NSP No. 0010-10-N.
2. The emission rates on the first row are short term and the second row are annual. The annual emission rates include hour and fuel limitations and NO<sub>x</sub> emission rates include a Tier 2 factor of 0.75 (0.75 of NO<sub>x</sub> is converted to NO<sub>2</sub>).
3. The stack exit temperature and velocity used in the model is more conservative than the manufacturer's data. The stack heights for the DEGs will be a permit requirement since they had to be extended to meet SAAQS.

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**Table 5  
Predicted Ambient Air Quality Impacts**

AIR POLLUTANT	AVERAGING TIME	DEGs <sup>1</sup> (µg/m <sup>3</sup> )	BACKGROUND <sup>2</sup> (µg/m <sup>3</sup> )	TOTAL IMPACT (µg/m <sup>3</sup> )	AIR STANDARD (µg/m <sup>3</sup> )	PERCENT STANDARD	IMPACT <sup>4</sup> LOCATION (x,y,z)
SO <sub>2</sub>	3-Hour	741.0	428	1169	1300	90%	284300, 2180700, 19
	24-Hour	203.0	107	310	365	85%	284300, 2180700, 19
	Annual <sup>4</sup>	14.0	7	21	80	26%	284300, 2180700, 19
NO <sub>2</sub>	Annual <sup>4,5</sup>	59.6	9	69	70	98%	284300, 2180700, 19
CO	1-Hour	1587.0	2394	3981	10000	40%	284210, 2180520, 12
	8-Hour	539.0	983	1522	5000	30%	284210, 2180400, 17
PM <sub>10</sub>	24-Hour	22.6	29	52	150	34%	284300, 2180700, 19
	Annual <sup>4</sup>	1.4	13	14	50	29%	284300, 2180700, 19
Pb <sup>6</sup>	Calendar Quarter	--	--	--	1.5	0%	--
H <sub>2</sub> S <sup>6</sup>	1-Hour	--	--	--	35	0%	--

Note:

1. The concentrations are from the worst case scenario of four (4) DEGs operating at the facility (including the DEG permitted by NSP No. 0010-10-N).
2. The background concentrations are taken from Hilo, Big Island for SO<sub>2</sub> and PM<sub>10</sub>; and Kapolei, Oahu for NO<sub>2</sub> and CO in the 2004 Hawaii Air Quality Data.
3. (x, y, z) = x-coordinate, y-coordinate, and elevation ( in meters).
4. The annual concentrations include hour and fuel limitations.
5. NO<sub>2</sub> emission rates include a Tier 2 factor of 0.75 (0.75 of NO<sub>x</sub> is converted to NO<sub>2</sub>).
6. Pb and H<sub>2</sub>S emissions are not expected at this facility.

**Other Issues:** The 150 kW DEG in 0010-10-N will be limited to 51,800 gal/yr to meet SAAQS.

**Existing Permit Conditions:**

240 tph AC plant Subject to NSPS Subpart I.

Annual source performance test.

635 kW DEG to operate as the primary power source.

The 240 tph and the 110 tph AC plants shall not operate simultaneously (to meet SAAQS).

Attachment IIA, F.2.b was removed because changes in the baghouse pressure will be inevitable and is the means of monitoring. Therefore, it would not be considered a deviation.

Attachment IIA, F.6 was removed because reporting of source performance test plans and reports are already required in the **Section G. Testing Requirements** section.

110 tph AC plant

The 240 tph and the 110 tph AC plants shall not operate simultaneously (to meet SAAQS).

1,000 tph stone processing plant

Standard conditions to control fugitive emissions.

The initial crusher is subject to NSPS Subpart OOO (because it has a capacity greater than 150 tph and was manufactured after August 31, 1983).

Operating limit of 6,000 hrs in any rolling 12-month period (to meet SAAQS).

660 tph stone processing plant

Operating limit of 1,920 hrs in any rolling 12-month period.

May be relocated upon submission and approval of the relocation form.

**New Permit Conditions:**

240 tph and 110 tph AC plants

- The combined operating hours for both AC plants shall not exceed 2,400 hrs in any rolling 12-month period (to meet SAAQS).
- Attachment IIA, C.7.b was revised to change the baghouse pressure limit to 2 to 5 inches H<sub>2</sub>O.

660 tph stone processing plant

- This plant cannot relocate to the Hilo facility (to remain a non-major source).

Back-up DEGs

- The 1,080 HP and 620 HP DEGs may be used at any time in addition to the 635 DEG powering the 240 tph AC plant, but are subject to fuel limits (equivalent to 2,000 hr/yr).
- Alternate operating scenario to replace DEG(s).

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**June 14, 2006**

**Conclusion and Recommendation:**

In conclusion, it is the Department of Health's preliminary determination that the facility will comply with all State and Federal laws, rules, regulations, and standards with regards to air pollution. This determination is based on the application submitted by Jas. W. Glover, Ltd. Therefore, a renewal to a temporary covered source permit for Jas. W. Glover, Ltd. subject to the above permit conditions, 30-day public notice period, and 45-day EPA review is recommended.