PERMIT APPLICATION REVIEW
TEMPORARY COVERED SOURCE PERMIT NO. 0826-01-CT
Application for Initial Temporary Covered Source No. 0826-01

Company: Powerscreen of California

Mailing Address: 10 Case Court
American Canyon, California 94503

Facility: Mobile Crushing Plant

Location: Various Temporary Sites, State of Hawaii

Initial Location: 95-109 Waikalani Drive, Mililani, Oahu

SIC Code: 1442 (Construction sand and gravel)

Responsible Official: Mr. Jay Wessell
Chief Financial Officer
(707) 253-1874

Contact: Mr. Fred Peyer
CFM Environmental, LLC
95-109 Waikalani Drive
Mililani, Hawaii 96789
(808) 779-2948

PROPOSED PROJECT

Powerscreen of California proposes to operate a mobile crushing plant for stone processing activities. The equipment will be used to crush rock and other materials for construction purposes. Materials will be batch-dropped into a primary crusher then forwarded via a built-in screen to dual conveyors to stockpiles.

The equipment consists of one primary track-mounted impact crusher, Powerscreen Trakpactor. The primary crusher is self-propelled by the integrated diesel engine. The engine will not be subject to the permit since it propels the crusher and is exempt pursuant to HAR §11-60.1-82(d)(4), which exempts internal combustion engines propelling mobile sources.

There will be no operating limitations for the proposed crushing plant.

EQUIPMENT DESCRIPTION

a. 352 TPH Powerscreen Trakpactor Mobile Crusher (2015), model no. XH320SR, serial no. TBA, with exempt 350 HP Scania diesel engine, Tier 4i, serial no. TBA; and
b. Various conveyors and water sprays.

AIR POLLUTION CONTROLS

The crushing plant is equipped with water spray systems to control fugitive dust. Water trucks/water sprays will be used as necessary to minimize fugitive dust from plant operations, material transfer points, stockpiles, and plant roads.

APPLICABLE REQUIREMENTS

Hawaii Administrative Rules (HAR)
Title 11 Chapter 59, Ambient Air Quality Standards
Title 11 Chapter 60.1, Air Pollution Control
- Subchapter 1, General Requirements
- Subchapter 2, General Prohibitions
  - 11-60.1-31, Applicability
  - 11-60.1-32, Visible Emissions
  - 11-60.1-33, Fugitive Dust
  - 11-60.1-38, Sulfur Oxides from Fuel Combustion
- Subchapter 5, Covered Sources
- Subchapter 6, Fees for Covered Sources, Noncovered Sources, and Agricultural Burning
  - 11-60.1-111, Definitions
  - 11-60.1-112, General Fee Provisions for Covered sources
  - 11-60.1-113, Application Fees for Covered sources
  - 11-60.1-114, Annual Fees for Covered sources
  - 11-60.1-115, Basis of Annual Fees for Covered Sources
- Subchapter 8, Standards of Performance for Stationary Sources
  - 11-60.1-161, New Source Performance Standards
- Subchapter 9, Hazardous Air Pollutant Sources
- Subchapter 10, Field Citations

Standard of Performance for New Stationary Sources (NSPS), 40 Code of Federal Regulations (CFR) Part 60
Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants is applicable to the stone processing and screening plant because the maximum capacity of the plant is greater than 150 tons/hour, and the plant was manufactured after August 31, 1983.

The 352 TPH Powerscreen Trakpactor Mobile Crusher (2015) was manufactured after April 22, 2008. Equipment that commence construction, modification, or reconstruction on or after April 22, 2008, are subject to more stringent fugitive emission opacity limits.

Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines is not applicable to the diesel engine because the engine is considered a nonroad engine as defined in 40 CFR §1068.30.
Subpart IIII applies to stationary internal combustion engines that are not nonroad engines.

National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61
This source is not subject to NESHAPs because there are no standards in 40 CFR Part 61 applicable to this facility.

NESHAPs for Source Categories (Maximum Achievable Control Technology (MACT)), 40 CFR Part 63
Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) is not applicable to diesel engine because the engine is considered nonroad engines as defined in 40 CFR §1068.30. Subpart ZZZZ applies to stationary internal combustion engines that are not nonroad engines.

Prevention of Significant Deterioration (PSD), 40 CFR Part 52, §52.21
This source is not subject to PSD requirements because it is not a major stationary source as defined in 40 CFR §52.21 and HAR, Title 11, Chapter 60.1, Subchapter 7.

Compliance Assurance Monitoring (CAM), 40 CFR 64
This source is not subject to CAM because the facility is not a major source. The purpose of 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 pre-control emissions that are 100% of the major source level; and (5) not otherwise be exempt from CAM.

Air Emissions Reporting Requirements (AERR), 40 CFR Part 51, Subpart A
AERR is not applicable because potential emissions from the facility do not exceed AERR thresholds.

CAB In-house Annual Emissions Reporting
The Clean Air Branch (CAB) requests annual emissions reporting from those facilities that have facility wide emissions exceeding in-house reporting levels and for all covered sources. Annual emissions reporting will be required because this facility is a covered source.

Best Available Control Technology (BACT)
This source is not subject to BACT analysis because potential emissions due to the facility is below significance levels. BACT analysis is required for new sources or modifications to sources that have the potential to emit or increase emissions above significant levels considering any limitations as defined in HAR, §11-60.1-1.

Synthetic Minor Source
A synthetic minor source is a facility that is potentially major, as defined in HAR, §11-60.1-1, but is made non-major through federally enforceable permit conditions. This facility is not a synthetic minor source because potential emissions do not exceed major source thresholds when the facility is operated without limitations for 8,760 hours/year.

INSIGNIFICANT ACTIVITIES / EXEMPTIONS

The proposed primary mobile crusher, Powerscreen Trakpactor, is self-propelled by the integrated diesel engine. The engine propels the crusher and is exempt pursuant to HAR §11-60.1-82(d)(4), which exempts internal combustion engines propelling mobile sources.

ALTERNATIVE OPERATING SCENARIOS

Diesel Engines and Diesel Engine Generators
None proposed.

PROJECT EMISSIONS

Emissions due to the proposed 352 TPH mobile crusher with the exempt diesel engine are below significant levels.

Total facility emissions are summarized in the tables below:

352 TPH Mobile Crushing Plant

Total Facility Emissions and Trigger Levels (TPY)					
Pollutant	Emissions (No Limits)	BACT Significant Levels	AERR Thresholds	DOH Levels	Storage Pile and Vehicle Travel Emissions
CO	0	100	1000	250	0
NO_X	0	40	100	25	0
SO_2	0	40	100	25	0
PM	6.02	25	-	25	45.86
PM-10	2.29	15	100	25	14.21
PM-2.5	0.32	10	100	-	1.74
VOC	0	40	100	25	0
HAPs	0	-	-	5	0

Greenhouse Gas (GHG) Emissions
There are no GHG emissions because emissions from the crushing plant are fugitive in nature.

AIR QUALITY ASSESSMENT

An ambient air quality impact analysis (AAQIA) is generally required for new or modified sources to demonstrate compliance with State and National ambient air quality standards.

An AAQIA is not required for the proposed exempt nonroad diesel engine on the mobile crushing (track-mounted) plant. Other emissions from the proposed crusher is fugitive in nature and do not require an ambient air quality impact analysis.

SIGNIFICANT PERMIT CONDITIONS

There are significant permit conditions for the proposed mobile Powerscreen Trakpactor crushing plant.

The mobile crushing plant construction date is after April 22, 2008. Performance testing, reporting and recordkeeping are needed in the permit to meet the requirements of 40 CFR 60, Subpart OOO.

Fugitive Emission Limits

a. The permittee shall not cause to be discharged into the atmosphere from any crusher, fugitive emissions which exhibit greater than twelve (12) percent opacity.
b. The permittee shall not cause to be discharged into the atmosphere from any transfer point on the belt conveyors, screening operation, or from any other affected facility, fugitive emissions which exhibit greater than seven (7) percent opacity

CONCLUSION

Powerscreen of California has submitted an application for a proposed 352 TPH mobile crushing plant. The emissions are below significant levels. Recommend issuance of the covered source permit subject to the incorporation of the permit conditions,
forty five-day (45-day) Environmental Protection Agency review period and thirty-day (30-day) public comment period.

GS
September 2015