

COVERED SOURCE MINOR MODIFICATION APPLICATION REVIEW

Application Number 0214-08

APPLICANT: Kalaeloa Partners, L.P.
Kalaeloa Cogeneration Facility
Covered Source Permit (CSP) Number 0214-01-C

**LOCATION/
MAILING ADDRESS:** 99-111 Kalaeloa Boulevard
Kapolei, HI 96707

**RESPONSIBLE
OFFICIAL/POC:** Mr. Hans R. Tobler (Ruedi)
General Manager
(808) 682-5288

SIC CODE: 4911 (Electrical Power Generation)

PROPOSED PROJECT:

The subject application, a minor modification to an existing Title V permit, seeks to increase the specification used oil consumption limit in the combustion turbines. The primary purpose of firing the used oil in the turbines to dispose of used oil generated by the facility. The used oil will be injected into the turbine fuel stream with a beverage pump. An increase in the operational limit from 2,000 gallons to 10,000 gallons in a rolling twelve (12) month period has been proposed by the facility.

EMISSIONS:

Emissions will not increase due to the modification for the following reasons:

1. A comparison of the analytical results between the used lubrication oil and recent low sulfur fuel oil (LSFO) deliveries demonstrates that the constituents in the used lubrication oil will not increase the emissions of any air pollutant above permitted emission limits.
2. The spec used oil will be incorporated into the combustion turbine fuel stream of 110 gallons per minute via a beverage pump at a rate of approximately 3 gallons per minute. The 10,000 gallons of used oil in any rolling 12-month period is insignificant as compared to the allowable amount of over 100 million gallons in any rolling 12-month period.

APPLICABLE REQUIREMENTS:

Hawaii Administrative Rules (HAR)
Chapter 11-59, Ambient Air Quality Standards
Chapter 11-60.1, 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

PROPOSED

Subchapter 6, Fees for Covered Sources, Noncovered Sources, & 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
Subchapter 7, Prevention of Significant Deterioration Review
Subchapter 8, Standards of Performance for Stationary Sources
Subchapter 10, Field Citations

INSIGNIFICANT ACTIVITIES/EXCEPTIONS:

No additional insignificant activities were proposed with the permit modification

ALTERNATIVE OPERATING SCENARIOS:

None (unchanged from initial application)

AIR QUALITY ASSESSMENT:

An ambient air quality assessment was not required for this modification because there are no increases in short term (g/s) or long term (tpy) emission rates from previously modeled levels.

OTHER ISSUES:

None

SIGNIFICANT PERMIT CONDITIONS:

The facility is required to submit an additional monitoring form documenting the composition of the used oil and the amount used on a rolling twelve month basis.

CONCLUSION AND RECOMMENDATION:

The facility complies with all State and Federal standards with regards to air pollution.
Recommend approval of permit modification pending EPA 45-day review.

Kevin Kihara
May 29, 2009