

PROPOSED

COVERED SOURCE MINOR MODIFICATION APPLICATION REVIEW (0045-13)

Covered Source Permit (CSP) 0045-01-C

APPLICANT: Grace Pacific Corporation
Makakilo Quarry

LOCATION: 91-920 Farrington Highway
Kapolei, HI 96707

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SIC CODE: 1411 (Dimension Stone)

PROPOSED PROJECT:

The subject application, a minor modification to an existing covered source permit, seeks to permit an alternate operating scenario for the diesel engine generator located at the 600 ton per hour aggregate recycling plant. The addition of the alternate operating scenario will allow the permittee to replace the generator in case of failure. The minor modification application filing fee of \$100 was submitted in conjunction with the application.

EQUIPMENT:

The modification does not change the permitted equipment at the facility. If the existing diesel engine generator is to be replaced, the department is required to be notified prior to proceeding.

AIR POLLUTION CONTROL EQUIPMENT:

Not applicable.

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

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Subchapter 5, Covered Sources
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 8, Standards of Performance for Stationary Sources
Subchapter 10, Field Citations

PREVENTION OF SIGNIFICANT DETERIORATION (PSD):

The addition of an alternate operating scenario will not increase emissions. Therefore, PSD review does not apply.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS):

No hazardous air pollutants are emitted at significant levels. Therefore, National Emission Standards for Hazardous Air Pollutants (NESHAPS) does not apply.

NEW SOURCE PERFORMANCE STANDARDS (NSPS):

The addition of the alternate operating scenario for the diesel engine generator does not trigger any Federal New Source Performance Standards.

CDS: The CDS determination is unchanged. The facility is a type B CDS source because NSPS is applicable and potential emissions are below all applicable major source thresholds.

CERR: Consolidated Emission Reporting Rule (CERR) requirements are unchanged. The facility is subject to the consolidated emissions reporting rule (CERR). The level of emissions require that reporting be done every three years.

SYNTHETIC MINOR APPLICABILITY:

The facility is currently classified as a major source. Therefore, synthetic minor applicability does not apply.

COMPLIANCE ASSURANCE MONITORING:

Compliance Assurance Monitoring (CAM) does not apply to this facility because the unit is not subject to an emission limitation or standard.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) REQUIREMENTS:

The addition of an alternate operating scenario does not increase project emissions. Therefore a Best Available Control Technology review is not required.

INSIGNIFICANT ACTIVITIES/EXCEPTIONS: None

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ALTERNATIVE OPERATING SCENARIOS:

The alternate operating scenario proposed by the permittee is the following:

Alternate Operating Scenario - Diesel Engine Generator (DEG)

- a. The permittee may replace a DEG with a temporary replacement unit if any repair work reasonably warrants the removal (i.e., equipment failure, engine overhaul, or any major equipment problems requiring maintenance for efficient operation) of the DEG and the following provisions are adhered to:
 - i. Written notification identifying the reasons for the replacement DEG from the site of operation is submitted to and approved by the Department of Health prior to the installation;
 - ii. The DEG is replaced with a temporary replacement DEG of the same size or smaller and with equal or less emissions;
 - iii. The temporary replacement unit complies with all applicable conditions including all air pollution control equipment requirements, operating restrictions and emission limits;
 - iv. The DEG shall be repaired and returned to service at the same location in a timely manner; and
 - v. Prior to the removal and return of the DEG, the permittee shall submit to the Department of Health written documentation on the removal and return dates and on the make, size, model and serial numbers for both the temporary replacement unit and installed unit.
- b. The permittee shall contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility the scenario under which it is operating and, if required by any applicable requirement of the Department, submit written notification to the Department; and
- c. The terms and conditions under each alternative operating scenario shall meet all applicable requirements including conditions of this permit.

PROJECT EMISSIONS:

The addition an alternate operating scenario will not increase facility emissions since only one diesel engine generator can be operating at a time.

AIR QUALITY ASSESSMENT:

The addition of an alternate operating scenario will not increase facility emissions. Therefore, an ambient air analysis was not performed in for this modification.

OTHER ISSUES:

None

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SIGNIFICANT PERMIT CONDITIONS:

Refer to the Alternate Operating Scenario Section

CONCLUSION AND RECOMMENDATION:

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

Kevin Kihara
May 18, 2004