

Date

03  
File #0238

Mr. Thomas C. Simmons  
Vice President, Power Supply  
Hawaiian Electric Company, Inc.  
P. O. Box 2750  
Honolulu, Hawaii 96840-0001

Dear Mr. Simmons:

**Subject: Covered Source Permit (CSP) No. 0238-01-C  
Renewal Application No. 0238-02  
Hawaiian Electric Company, Inc. (HECO)  
Honolulu Generating Station  
Two (2) Boilers  
Located at: Honolulu, Oahu**

Thank you for your comments in the air permit process. Please find enclosed the Department of Health's responses to your comments on the draft permit and the final covered source permit for the subject facility. The Department has revised the permit accordingly pursuant to the comments.

Please also be informed that, should you desire, you may petition the Administrator of the U.S. Environmental Protection Agency, Region 9 in accordance with 40 CFR 70.8(d) or petition the Department in accordance with Hawaii Administrative Rules, Section 11-60.1-100 to review any condition of the permit.

If you have any questions, please call Mr. Corey Shibata of the Clean Air Branch at (808) 586-4200.

Sincerely,

THOMAS E. ARIZUMI, P.E., CHIEF  
Environmental Management Division

CBS/lk  
Enclosures

**SUMMARY OF PUBLIC COMMENTS RECEIVED  
ON THE DRAFT COVERED SOURCE PERMIT FOR  
HECO - HONOLULU GENERATING STATION  
LOCATED AT HONOLULU, OAHU**

**1. OVERVIEW**

Pursuant to Hawaii Administrative Rules, Chapter 11-60.1, a 30-day public comment period was afforded between September 26 and October 27, 2003. The purpose was to receive public comments on the draft Covered Source Permit (CSP) No. 0238-01-C. Approval and issuance of the air permit will allow HECO to continue operation of two (2) utility boilers at the Honolulu Generating Station.

During the 30-day public comment period, the Department of Health (DOH) received one comment from HECO dated October 27, 2003. As a result, the DOH made changes to the permit accordingly. The permit changes are shown in Section 2. Section 3 presents HECO's comments and the DOH's responses.

**2. REVISIONS TO THE PERMIT**

The following revisions were made by the Department (changes are underscored).

The permit's cover letter was revised to reflect the current responsible official.

Mr. Thomas C. Simmons  
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Dear Mr. Simmons:

Attachment II, Special Condition No. B.1 was revised to include propane as a fuel used for ignition only.

1. Fuel Oil No. 6 and 2

The boilers shall be fired only on fuel oil no. 6 and 2 with a maximum sulfur content not to exceed 0.5% percent by weight. Propane may be used for ignition only.

(Auth.: HAR §11-60.1-3, §11-60.1-5, §11-60.1-38, §11-60.1-90)

Attachment II, Special Condition No. B.2.f was revised to clarify that the used oil conditions will only apply to used oil meant for energy recovery.

f. Samples of the used oil generated from within HECO's facilities for

energy recovery shall be taken from the holding tanks or drums, and composited and analyzed for compliance with the limits in Special Condition No. B.2.j prior to being emptied into the reclaim tank and burned. These samples shall be taken in such a manner that the composite sample is representative of all of the used oil generated by the facility for that period of time. The composite sample shall represent no more than 2,000 gallons of used oil or all of the used oil collected in any six (6) month period, whichever is less.

Attachment II, Special Condition No. B.2.k was revised for grammatical clarification.

- k. The used oil shall not be burned prior to receipt of the lab analyses. Should the results of any used oil analyses deem the sample to be hazardous, the contaminated containers shall be identified and isolated from the non-contaminated containers and properly disposed. The blending of used oil to meet the constituents/property limits given in Special Condition No. B.2.j. is allowable only for used oil that were not deemed hazardous.

The permit review was revised to reflect the new responsible official and point of contact.

**Responsible Official:**

Thomas C. Simmons  
Vice President, Power Supply  
\_\_\_\_\_  
(808) 543-7505

**Point of Contact:**

Ms. Sherri-Ann Loo  
Manager Environmental Dept  
(808) 543-4500

**3. HECO'S COMMENT AND DEPARTMENT'S RESPONSE**

Comment: HECO notified the DOH of the changes in responsible official and point of contact.

Response: The DOH made the changes to the permit and its review accordingly.

Comment: HECO requested to add propane as a listed fuel since it is currently used for boiler ignition.

Response: The DOH agrees that propane should be listed as a permitted fuel. However, the propane condition was limited to ignition use only since a full review of its continuous use was not conducted. Since propane is generally a 'cleaner' fuel than fuel oil nos. 6 and 2, a separate review for this change was not conducted.

Comment: HECO requested to differentiate between recovered oil used for energy recovery (fuel combustion) versus other uses.

Response: The specification (spec) used oil conditions in the permit is meant for operations concerning air pollution only such as recovered oil used for energy recovery. However, the DOH did revise the spec used oil condition to further clarify this issue.

Comment: HECO requested to clarify used oil wording and a grammatical error.

Response: The DOH agrees with the clarification and the changes were made.