

**SUMMARY OF PUBLIC COMMENTS RECEIVED
ON THE DRAFT AIR PERMIT FOR
KAUAI ISLAND UTILITY COOPERATIVE
PORT ALLEN GENERATING STATION
LOCATED AT: 261 AKAULA STREET, ELEELE, KAUAI**

I. OVERVIEW

Pursuant to Hawaii Administrative Rules, Chapter 11-60.1, a public comment period was held from October 10, 2012 to November 9, 2012. The purpose was to receive public comments on Draft Covered Source Permit (CSP) No. 0097-01-C. Approval and issuance of the air permit would allow Kauai Island Utility Cooperative to operate the existing Port Allen Generating Station and to comply with 40 CFR Part 63, Subparts ZZZZ and JJJJJJ.

During the public comment period, the Department of Health (hereinafter referred to as "DOH" or the "Department") received comments from one (1) commenter. These comments are presented throughout this document in appropriate sections.

Section II of this document describes the changes made to the draft air permit based on the public comments received. Section III of this document describes the changes made to the draft permit review summary based on the public comments received.

II. REVISIONS TO THE DRAFT PERMIT

Comment:

Referencing the Covered Source Permit, Attachment II(B), Special Condition No. C.1, a comment was made to correct the maximum fuel sulfur content limit from 0.04% to 0.4% by weight.

Response:

The Department of Health concurs with the commenter and has revised the permit condition to read as follows:

"1. Allowable Fuels

Diesel engine generators D-1, D-2, D-3, D-4 and D-5 shall be fired only on fuel oil no. 2, biodiesel [pure biodiesel (B100)], or any combination thereof, with a maximum sulfur content not to exceed 0.4% by weight. For the purposes of Special Condition Nos. C.3.a, C.3.b and C.4 of this Attachment, 1.0 gallon of fuel oil no. 2 is equivalent to 1.0 gallon of fuel and 1.0 gallon of biodiesel is equivalent to 1.02 gallons of fuel."

III. REVISIONS TO THE DRAFT PERMIT REVIEW SUMMARY

1. *Comment:*

Referencing page 2, paragraph 1 of the permit review summary, a comment was made to revise it as follows:

"The surrounding land is predominantly used for ~~growing sugar cane~~ agricultural purposes."

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

2. *Comment:*

Referencing page 2, paragraph 3 of the permit review summary, a comment was made to revise it as follows:

“Under base load or combined cycle operation the combustion gas from one of the gas turbines is exhausted through a heat recovery steam generator (HRSG). Only one of the gas turbines at a time can operate in combined cycle mode.”

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

3. *Comment:*

Referencing page 2, paragraph 6 of the permit review summary, a comment was made to revise it as follows:

“The RICE NESHAP also requires additional control of fugitive emissions from the engine crankcases; the EMDs are equipped with KIUC will comply with this requirement by installing crankcase lubricating oil separators to prevent lube oil mist from being emitted from the engine’s crankcases and do not require additional controls to achieve compliance with this requirement.”

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

4. *Comment:*

Referencing page 5 of the permit review summary, a comment was made to revise the Air Pollution Controls section as follows:

“7. Diesel engine generators D-1 thru D-5 are equipped with Miratech V-Cat oxidation catalyst systems and EMD lube oil separators and will utilize ultra-low sulfur (0.0015%) fuel oil to comply with 40 CFR Part 63, Subpart ZZZZ, effective May 3, 2013.”

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

5. *Comment:*

Referencing page 6 of the permit review summary, a comment was made to revise the Insignificant Activities section and Table 3 to include the following engines:

Emergency and Black Start Diesel Engines

- a. 398 bhp Caterpillar C9 ACERT emergency diesel engine generator;
- b. 300 hp Cummins V8 (starting engine for GT-1); and
- c. 475 hp EMD (starting engine for GT-2).

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

6. *Comment:*

Referencing page 6 of the permit review summary, a comment was made to revise the Fuels section and Table 4 as follows:

Fuel Oil No. 2 or Diesel No. 2	
Sulfur, wt. %	0.4% max (to 5/2/13) 0.0015% max (as of 5/3/13, <u>D-1 through D-5 only</u>)
Biodiesel	
Sulfur, wt. %	0.4% max (to 5/2/13) 0.0015% max (as of 5/3/13, <u>D-1 through D-5 only</u>)

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

7. *Comment:*

Referencing page 11, paragraphs 1 and 2 of the permit review summary, a comment was made to revise the Compliance Assurance Monitoring (CAM) section as follows:

Emission units are any part or activity of a stationary source that emits or has the potential to emit any air pollutant. Compliance Assurance Monitoring (CAM) is currently applicable to some of the emission units covered by ~~for~~ this permit renewal and by the significant modifications. Units D-6 through D-9 use add-on controls (FITR systems on Units D-6 through D-8 and the SCR system on Unit D-9) for the control of NO_x emissions ~~The control devices in operation that are required to meet established emissions standards, and thus are subject to CAM requirements, are the FITR systems on the diesel engines for Units D-6 through D-8 and the SCR system on Unit D-9. The purpose of these devices is the control of NO_x emissions.~~ The covered source permit requires KIUC to continuously monitor NO_x emissions from Units D-6 through D-9. Thus compliance with the CAM requirements for NO_x control is achieved through the use of NO_x CEMs on Units D-6 through D-9.

~~Also subject to CAM requirements will also apply to are the oxidation catalysts for Units D-13 through D-5, as well as to D-6 through D-9, because those units will use oxidation~~

~~catalysts that will be used~~ to control CO emissions. The significant modification to the covered source permit requires KIUC to use a CPMS (continuous parameter monitoring system) to continuously monitor and record temperature at the oxidation catalyst inlet (as a parameter for CO emissions) for Units D-~~13~~ to D-9.

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

8. *Comment:*

Referencing page 12, Table 10 of the permit review summary, a comment was made to revise the table as follows:

For Units D-6, D-7, D-8 and D-9, please change the reference from Note 11 to Note 12, and add new Note 12 to read: "Post-project CO based on 70% reduction from prior permit limit."

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.

9. *Comment:*

Referencing page 13, Table 11 of the permit review summary, a comment was made to revise the table as follows:

For Units D-6, D-7, D-8 and D-9, please change the reference from Note 5 to Note 6, and add new Note 6 to read: "Post-project CO based on 70% reduction from prior permit limit."

Response:

The Department of Health concurs with the commenter and has revised the permit review summary accordingly.