

COVERED SOURCE PERMIT REVIEW - NO. 0085-02
Renewal Application No. 0085-05

APPLICANT: Ameron International Corporation, dba Ameron Hawaii
Ameron Hawaii Camp 10 Quarry

RESPONSIBLE OFFICIAL:/POC Mr. Glenn H. Okuno
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LOCATION Camp 10 Quarry
Puunene, HI 96784
UTM Zone 4, 768,500 m East, 2,309,300 m North (Old HWN)

**PLANT SITE MANAGER/
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SIC 1429 – Crushed and Broken Stone, Not Elsewhere Classified

FACILITY DESCRIPTION

Ameron Hawaii's Camp 10 quarry is an existing facility currently permitted under Covered Source Permit (CSP) No. 0085-02-C. The facility is located in Puunene, Maui, approximately 1.5 miles south of Kahului Airport between Haleakala Highway and Pulehu Road. The renewal application does not propose any modifications to existing permit conditions. Permitted equipment at the facility consists of the following:

1. 600 TPH Stone Processing Plant:
 - a. 600 TPH Kue Ken primary jaw crusher, model no. 160X, serial no. 160X16958R;
 - b. 500 TPH Hazemag horizontal impact crusher, model no. APS1620K, serial no. HU1380;
 - c. 600 TPH Canica vertical impact crusher, model no. 100, serial no. EE-10020891;
 - d. 3 - 3 deck Hewitt-Robins screening towers, model no. V-16 8 x 20;
 - e. 2 - 2 deck Hewitt Robins screening towers, model no. V-14 6 x 16;
 - f. 536 HP Caterpillar diesel engine generator, model no. 3406C, serial no. 1LS01202;
 - g. Various conveyors; and
 - h. Water spray system.

2. 120 CY/hr Concrete Batch Plant:

- a. 120 CY/HR Rexcon concrete batch plant, model no. Rex HD-12, serial no. 2033;
- b. Two (2) C & W Manufacturing and Sales Co. silo dust collectors, model no. CP-305-839 and one (1) C & W Manufacturing and Sales Co. batcher dust collector, model no. CP-35-219 servicing the 120 CY/HR batch plant; and
- c. 300 TPH Kue Ken waste concrete crusher model no. 150, serial no. 15016453.

AIR POLLUTION CONTROLS

Air pollution controls at the facility consists of watersprays for control of fugitive dust emissions and baghouses for the cement silos.

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

Subchapter 8 - Standards of Performance for Stationary Sources

11-60.1-161 New Source Performance Standards

Subchapter 10 - Field Citations

New Source Performance Standards (NSPS)

40 CFR 60 - Standards of Performance for New Stationary Sources:

- Subpart A - General Provisions
- Subpart OOO - Standards of Performance for Non-metallic Mineral Processing Plants

Subpart OOO applies to fixed crushed stone plants with capacities greater than 25 TPH which commenced construction, reconstruction, or modification after August 31, 1983. The following equipment the 600 tph stone processing plant is subject to Subpart OOO requirements:

- Kue Ken 600 TPH primary jaw crusher, Model 160X
- Hazemag 500 TPH horizontal impact crusher, Model APS1620K
- Canica 600 TPH vertical impact crusher, Model 100
- 3 three-deck screening towers
- 2 two-deck screening towers
- various conveyors

The 300 TPH Kue Ken waste concrete crusher (model no. 150, serial no. 15016453) located at the 120 cy/hr concrete batch was manufactured in 1968, and thus is not subject to NSPS. The remainder of the concrete batch plant is not subject to NSPS requirements because no standard for this type of operation has been promulgated under 40 CFR 60.

NON-APPLICABLE REQUIREMENTS

Prevention of Significant Deterioration (PSD) Requirements

PSD requirements do not apply for this permit renewal because the facility is not proposing any changes to the existing Title V permit that will increase emissions from currently permitted levels.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

These requirements do not apply because no standard covering the facility's operation or equipment has been promulgated under 40 CFR 61.

Maximum Achievable Control Technology (MACT) Requirements

MACT requirements do not apply because the facility is not a major source of hazardous air pollutants and the facility does not belong to a source category or subcategory for which a standard has been promulgated under 40 CFR 63.

Best Available Control Technology (BACT) Requirements

A BACT review is required for new or modified sources which will result in a "significant" net emissions increase as defined in HAR §11-60.1-1. The facility is not proposing any changes to the existing permit that will cause an increase in emissions. Therefore BACT does not apply to the permit renewal.

Compliance Assurance Monitoring (CAM):

Applicability of the CAM Rule (40 CFR Part 64) is determined on a pollutant specific basis for each affected emission unit. Each determination is based upon a series of evaluation criteria. In order for a source to be subject to CAM, each source must:

1. Be located at a major source per Title V of the Clean Air Act Amendments of 1990;
2. Be subject to federally enforceable applicable requirements;
3. Have pre-control device potential emissions that exceed applicable major source thresholds;
4. Be fitted with an "active" air pollution control device; and
5. Not be subject to certain regulations that specifically exempt it from CAM.

Emission units are any part or activity of a stationary source that emits or has the potential to emit any air pollutant.

Although the facility is a major source, CAM does not apply because no emission unit uses a control device (as defined under 40 CFR 64.1) to achieve compliance with any emission limitation or standard. Water sprays or enclosures used to minimize fugitive emissions are not defined to be control devices since they do not destroy or remove air pollutants prior to discharge to the atmosphere.

Consolidated Emissions Reporting Requirements (CERR)

Pursuant to 40 CFR 51 Subpart A, States are required to report emissions from facilities that exceed the CERR levels shown in the following table.

CERR Reporting Thresholds (TPY)

Pollutant	Stone Processing Plant	Concrete Plant	Total Emissions	CERR Reporting Levels	
				Type A (Annual)	Type B (Every 3 years)
CO	5.895	-	5.895	≥ 2,500	≥ 100
NO _x	27.367	-	27.367	≥ 2,500	≥ 100
PM ₁₀	208.685	17.213	225.90	≥ 250	≥ 100
SO _x	3.190	-	3.190	≥ 2,500	≥ 100
VOC	2.234	-	2.234	≥ 250	≥ 100
Pb	--	0.004	0.004	--	≥ 5

Based on the calculated annual PM₁₀ emissions, the facility is classified as a type B CERR source, and CERR emissions reporting is required once every three years.

Synthetic minor applicability

The facility is a major source. Therefore, synthetic minor applicability is not an issue.

FACILITY EMISSIONS

Facility emissions remain unchanged for this permit renewal and were not recalculated. Emission levels were calculated previously in conjunction with Significant Modification 0085-04, issued 7/11/05, and are restated in the following table for convenience. Detailed emission calculations can be found in the review for Significant Modification 0085-04.

Ameron Camp 10 Facility Emissions (TPY)

Pollutant	DEG ¹	Stone Processing Equipment	Total Stone Processing Plant	Concrete Plant	Total Emissions
CO	5.895	-	5.895	-	5.895
NO _x	27.367	-	27.367	-	27.367
PM	2.001	694.827	696.828	48.929	745.757
PM ₁₀	1.924	206.761	208.685	17.213	225.898
SO _x	3.190	-	3.190	-	3.190
TOC/VOC	2.234	-	2.234	-	2.234
HAPS	0.040	-	0.040	0.141	0.181

¹ Based on 3,744 hours of operation annually

Air Quality Assessment

An Ambient Air Quality Impact Assessment is required for new sources or for existing sources that modify emission rates. The facility in question is not proposing any changes to the existing permit. Therefore, an ambient air quality assessment is not required for this permit renewal.

Insignificant Activities / Exemptions

The only insignificant activity required to be listed in the permit application is a 10,000 gallon diesel fuel underground storage tank. The storage tank is considered insignificant pursuant to HAR §11-60.1-82(f)(1).

Conclusion:

Recommend renewal of Covered Source Permit upon completion of EPA 45-day review.

Kevin Kihara
April 14, 2008