



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUL 17 2014

Mr. Nolan Hirai
Clean Air Branch
Hawaii Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Mr. Hirai:

On February 7, 2014 Administrator Gina McCarthy (the Administrator) signed an Order to partially grant and partially deny a petition from Preserve Pepe'ekeo Health and Environment (Petitioner) to object to the title V permit issued by the Hawaii Department of Health (HDOH) to the Hu Honua Bioenergy Facility (Hu Honua). On June 4, HDOH submitted a proposed permit amendment to the United States Environmental Protection Agency (EPA) to address the claims that were granted by the Administrator. We have reviewed HDOH's proposed amendments and have the following comments.

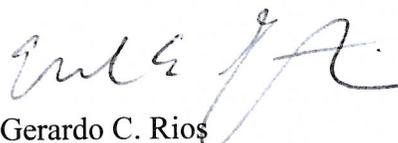
1. Special Conditions F.6.a.vi and F.6.a.vii should reference the emission limits in C.6 and C.7 for CO, NO_x, and HAPs.
2. The equations provided in Special Conditions E.14 and E.15 refer to fuel consumption in annual units (lbs of wood per year or gallons per year) and engine hour meter readings in hours per year. Because compliance with the facility-wide emission limits in Special Conditions C.6 and C.7 are verified monthly on a rolling 12-month basis, conditions containing monitoring, calculation methods, or record keeping related to these limits should refer explicitly to monthly and rolling 12-month periods, not years.
3. Special Conditions C.7, E.15, and F.6.a.vii require the permittee to include emissions during startup, shutdown, and malfunction to calculate monthly HAP emissions from the facility. The permit should include a protocol to account for emissions during these operating scenarios, such as restricting biomass consumption during startup and shutdown and using good engineering practices for estimating HAP emissions (other than HCl) during malfunctions. The permit should also apply appropriate conditions to define and limit startups, shutdowns, and malfunctions.
4. Special Conditions E.14.a and E.15.a require the permittee to use data from the boiler's CO, NO_x, and HCl CEMS or "data from the boiler's source performance tests" for CO,

NOx and HCl “when missing CEMS data” to calculate emissions. Rather than using source test data to fill CEMS data gaps, EPA recommends that the permit reference EPA-approved methods for CEMS data substitution, such as those at 40 CFR part 75.

5. Special Condition E.15.a. allows the permittee to calculate HAP emissions for which performance test and CEMS data is not available on the basis of several sources of emissions factors. It appears that Appendix C of Hu Honua’s December 2010 application relied on each of these sources on a pollutant-specific basis. EPA recommends that the permit adopt a similar approach, perhaps by cross-reference to Appendix C. The permit might also allow the permittee to use a different emission factor upon HDOH’s prior, written approval.
6. Special Condition C.2 states that emission limits for NO_x, CO, SO₂, VOC, and HCl apply at all times except during startup and shutdown. HDOH’s revised Review Summary explains that “air pollution control equipment are not fully optimized during startup and shutdown conditions” and that the exclusion of startup and shutdown periods in the permit is similar to an exclusion in EPA’s regulations under 40 CFR Part 63. EPA recommends that HDOH consider including additional explanation of the applicability or non-applicability of BACT during startup and shutdown. In addition, EPA recommends that permitting authorities include emission limits and/or work practice standards to regulate startup and shutdown operations.
7. Special Condition E.14.b and E.15.d appear to allow the permittee to use multiple sources to obtain the higher heating value (HHV) of biodiesel. The permittee should use HHV data from the fuel vendor specific to the fuel used at the facility, or another source upon HDOH’s prior written approval.

Thank you for the opportunity to review these permit amendments. If you have any questions about these comments, please do not hesitate to contact Geoffrey Glass of my office (415-972-3498, Glass.Geoffrey@epa.gov) or Noah Smith of the Office of Regional Counsel (415-947-4243, Smith.Noah@epa.gov).

Sincerely


For Gerardo C. Rios
Chief, Permits Office