

**REQUEST FOR PUBLIC COMMENTS
ON DRAFT AIR PERMIT
REGULATING THE EMISSIONS OF AIR POLLUTANTS**

(Docket No. 16-CA-PA-06)

Pursuant to Hawaii Revised Statutes (HRS), Chapter 342B-13 and Hawaii Administrative Rules (HAR), Chapter 11-60.1, the Department of Health, State of Hawaii (DOH), is requesting public comments on the following **DRAFT PERMIT** presently under review for:

Covered Source Permit (CSP) No. 0793-01-C

Application for Initial Permit No. 0793-01
Hawaiian Electric Company, Inc.
Schofield Generating Station
Six (6) Engine Generators
Located At: Schofield Barracks, Wahiawa, Oahu

The **DRAFT PERMIT** is described as follows:

Prevention of Significant Deterioration (PSD)/CSP No. 0793-01-C, in accordance with Federal PSD regulations, 40 CFR §52.21, and HAR, Chapter 11-60.1, Air Pollution Control, will grant conditional approval for the construction and operation of Schofield Generating Station. Six internal combustion engine generations are proposed each with a peak generating capacity of 8.3 MW when fired on biofuel/diesel and 8.4 MW when fired on natural gas. The engine generators will be equipped with selective catalytic reduction and oxidation catalyst to control emissions. The engine generators are subject to 40 Code of Federal Regulations (CFR) Part 52, §52.21, Prevention of Significant Deterioration of Air Quality, 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Maximum potential ton per year (tpy) emissions estimated from operating the proposed generating station are shown in the table below in comparison to the significant emission rates.

Pollutant	Project Emissions (tpy)	Significant Emission Rate (tpy)
Carbon Monoxide (CO)	87.4	100
Nitrogen Oxides (NO _x)	1,035.4	40
Particulate Matter (PM)	72.3	25
PM under 10 µm dia. (PM ₁₀)	130.1	15
PM under 2.5 µm dia. (PM _{2.5})	130.1	10
Sulfur Dioxide (SO ₂)	9.4	40
Ozone (O ₃) (NO _x)	1,035.4	40

O ₃ (VOC)	125.4	40
Lead (Pb)	0.0260	0.6
Fluorides	0.0187	3
Sulfuric Acid Mist (H ₂ SO ₄)	6.12	7
GHG (CO ₂ e)	304,423	75,000

The air quality assessment demonstrates that the proposed project will not cause or contribute to a violation of the applicable National or State Ambient Air Quality Standards (NAAQS/SAAQS) or PSD increments. Full impact analyses for CO and SO₂ are not required since the maximum project impacts are less than the PSD significant impact levels. The table below shows that the project does not cause or contribute to a violation of the NAAQS or SAAQS.

Pollutant	Averaging Period	Modeled Impact (µg/m ³)	Background (µg/m ³)	Total Impact (µg/m ³)	SAAQS (µg/m ³)	NAAQS (µg/m ³)	% of Standard
NO ₂	1-hr ¹	97.9	10.5	108.4	--	188	58%
	Annual ²	14.3	1.9	16.2	70	100	23%
PM ₁₀	24-hr ³	12.0	44.0	56.0	150	150	37%
	Annual ³	1.77	13.0	14.8	50	--	30%
PM _{2.5}	24-hr ^{4,6}	8.97	12.2	21.2	--	35	60%
	Annual ^{5,6}	1.67	5.2	6.87	--	12	57%

The ozone analysis demonstrates that the project should not significantly change the current ozone levels in the Schofield area.

The table below shows that the project does not cause or contribute to a violation of any PSD Class II Increment.

Pollutant	Averaging Period	Modeled Increment Consumption (µg/m ³)	PSD Class II Increment (µg/m ³)	% of Standard
NO ₂	Annual ¹	14.31	25	57.2%
PM ₁₀	24-hr ¹	12.0	30	40.0%
	Annual ¹	1.77	17	10.4%
PM _{2.5}	24-hr ^{2,3}	8.70	9	96.7%
	Annual ^{2,3}	1.72	4	43.1%

PSD Class I increment analysis is not required since the maximum project impacts are below the PSD Class I significant impact levels.

The **ADMINISTRATIVE RECORD**, consisting of the **APPLICATION** and non-confidential supporting material from the applicant, the permit review summary, and the **DRAFT PERMIT**, is available for public inspection during regular office hours, Monday through Friday, 7:45 a.m. to 4:15 p.m., at the following location:

Oahu:

- Clean Air Branch, Department of Health
919 Ala Moana Boulevard, Room 203, Honolulu, Oahu 96814

All comments on the draft permit and any request for a public hearing must be in writing, addressed to the Clean Air Branch at the above address on Oahu and must be postmarked or received by **April 25, 2016**.

Any person may request a public hearing by submitting a written request that explains the party's interest and the reasons why a hearing is warranted. The DOH may hold a public hearing if a hearing would aid in DOH's decision. If a public hearing is warranted, a public notice for the hearing will be published at least thirty days in advance of the hearing.

Interested persons may obtain copies of the administrative record or parts thereof at a copying cost of five cents per page. Please send written requests to the Oahu office of the Clean Air Branch listed above or call Mr. Mark Saewong at the Clean Air Branch in Honolulu at (808) 586-4200. Electronic copies of the draft permit and permit review may be found online at <http://health.hawaii.gov/cab/public-notice/>.

Comments on the draft permit should address, but need not be limited to, the permit conditions and the facility's compliance with federal and state air pollution laws, including: (1) the National and State Ambient Air Quality Standards; and (2) HRS, Chapter 342B and HAR, Chapter 11-60.1.

A final decision to set the conditions of and to issue the **FINAL PERMIT**, or to deny the application for the permit, shall be made after all comments pertaining to the **DRAFT PERMIT** and the Ambient Air Quality Impact Report have been considered. Notice of the final decision shall be sent to each person who has submitted comments or requested such notice.

The decision on PSD/CSP No. 0793-01-C shall become effective thirty days from the date of issuance unless:

1. A later effective date is specified in the decision; or
2. The decision on the permit is appealed by filing a petition for review with the Environmental Appeals Board, U.S. EPA, Washington, D.C. (Any person who filed comments on the draft permit or participated in the public hearing may, within thirty days after the decision has been issued, petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may petition for administrative review only to the extent of the changes from the draft to the final permit decision.)

Virginia Pressler, M.D.
Director of Health