

**FEDERAL LAND MANAGER CONSULTATION SUMMARY
HAWAII'S DRAFT REGIONAL HAZE STATE IMPLEMENTATION PLAN, REVISION 1
SECOND IMPLEMENTATION PERIOD (2018-2028)**

The National Park Service (NPS) consulted with the Hawaii State Department of Health, Clean Air Branch (DOH-CAB) on July 13, 2023, regarding the Draft Regional Haze State Implementation Plan (RH-SIP), Revision 1 for the Second Planning Period. Upon reviewing the revised RH-RH-SIP, the NPS expressed support for the long-term strategy described in the plan. They appreciated that cost analyses and cost-threshold have both been updated to reflect current economic conditions. After their review, they offered the following recommendations to strengthen the RH-SIP revision:

1. Include a date certain by which a compliance path must be identified for emission reductions from Maalaea Power Plant engines M10-13.
2. Require the Mauna Loa Macadamia Nut Corporation to provide an effective controls demonstration or conduct a four-factor analysis for the new boiler prior to installation.

The NPS noted that the revised RH-SIP revisited its initial control determinations for the Maalaea Power Plant and presented updated control cost estimates. The revised RH-SIP includes new cost estimates for adding selective catalytic reduction (SCR) to reduce nitrogen oxide (NO_x) emissions at four of the facility's diesel engines, M10-M13. These engines account for more than half of the annual NO_x emissions from the facility. The NPS recommended requiring the operator to commit to a compliance pathway (i.e., installation of controls or a federally enforceable shut down) by a specific date in the permit. In response, DOH-CAB incorporated a provision into the permit amendment to notify DOH-CAB and EPA on the compliance option chosen. Hawaiian Electric request a notification date of December 31, 2026 to allow time for PUC approval of the measure selected. Please see page 418 of Appendix P of the Draft RH-SIP, Revision 1.

The revised RH-SIP also included consideration of a nut processing plant operated by the Mauna Loa Macadamia Nut Corporation. This facility operates a biomass and used oil-fueled boiler. The NPS concurred with the determination to shut down the boiler and replace it by December 31, 2026. They recommended that the state add a requirement to the RH-SIP that the facility provide an effective controls determination or conduct a four-factor analysis for the new boiler prior to installation. This will ensure that the boiler shut down and replacement ultimately result in emission reductions. In response to the second comment, Mauna Loa Macadamia Nut Corporation must provide an effective control demonstration or conduct a four-factor analysis for replacing the main boiler at its plant with another unit. This will be accomplished during the permitting process to replace the main boiler with a new unit. Please see page 97 of the RH-SIP.