

From: Matsumura, April Mido
Sent: Friday, April 20, 2007 3:43 PM
To: 'Don Bryan'; 'John_Lague@URSCorp.com'
Cc: Hirai, Nolan S
Subject: Tradewinds
Attachments: 07-04-20 Memo to D Bryan.pdf

Don,

Please see attached memo.

Regards,
April

April Matsumura
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Hawaii Clean Air Branch
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Date: 4/20/07
To: Don Bryan, Tradewinds
From: April Matsumura, Clean Air Branch

**Subj: Permit Status
Commencement of EPA Review Period
Use of AP-42 Emission Factors**

Permit Status

No, a draft permit is not near completion. A permit cannot be drafted until the application review is complete and documented in a report which details emission totals, applicable federal and state regulations (eg: MACT for major HAP sources), appropriate limits, controls, etc. This report is then used as the basis for drafting a permit.

Commencement of EPA Review Period

At the time that the draft permit is complete, if you still wish to start the EPA review period simultaneously with the public comment period (with the understanding that a new 45-day review period will commence if the permit is changed) that can be done.

AP-42 Emission Factors

Despite the additional information recently provided, evaluation of your application will be based on EPA AP-42 emission factors (rather than NCASI factors) in the interest of providing the most conservative evaluation of facility emissions.

Each state has different local regulations for its air pollution program (eg: Some of Hawaii's ambient air standards are more stringent than federal standards.) So the fact that Texas and Louisiana find it acceptable to use NCASI data in evaluating their facilities does not entail that it is appropriate for Hawaii to do so.

Please consider proposing an emission limit to be verified by source performance testing (eg: lb/hr chloroform) or an operational limit, etc. if you prefer not to be subject to the requirements for a major source of hazardous air pollutants.