

REQUEST FOR PUBLIC COMMENTS
ON THE PROPOSED REVISIONS TO THE DRAFT AIR PERMIT
REGULATING THE EMISSIONS OF AIR POLLUTANTS

(Docket No. 08-CA-PA-14)

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 **PROPOSED REVISIONS** to the following **DRAFT PERMIT** presently under review for:

Covered Source Permit (CSP) No. 0625-01-C
Initial Covered Source Permit Application No. 0625-01
Tradewinds Forest Products, LLC
132.4 MMBtu/hr Boiler and Veneer Dryer
Located at: 39-3324 Old Mamalahoa Highway, O'okala, Hawaii

The **DRAFT PERMIT** and **PROPOSED REVISIONS** are described as follows:

The **DRAFT PERMIT** for Covered Source Permit (CSP) No. 0625-01-C would grant conditional approval for the construction and operation of a 132.4 MMBtu/hr boiler with a mechanical dust collector and dry electrostatic precipitator for the control of PM emissions, a veneer dryer with a wet electrostatic precipitator for the control of PM emissions, and a cooling tower. The boiler is subject to federal requirements of 40 CFR Part 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

The DOH held a public hearing on October 30, 2007 and a public comment period from September 28 to November 6, 2007 on the draft permit. All comments received from the 2007 public hearing and comment period are still part of the record and will be considered in making a final decision on the permit. The DOH will not be accepting further comments on the original draft permit and will only be considering comments on the proposed revisions to the draft permit.

The **PROPOSED REVISIONS** to the **DRAFT PERMIT** include:

1. Revisions made to the permit for clarification purposes.
2. The addition of a Continuous Opacity-Monitoring System (COMS) for the boiler which was inadvertently omitted from the original draft permit. The COMS is a federal requirement of 40 CFR, Part 60, Subpart D.
3. Revisions made to the permit to address concerns regarding HCl emissions from the boiler from the combustion of wood fuel.
4. Revisions made to the permit to address VOC emissions from the veneer dryer, and the potential trigger of a Best Available Control Technology analysis.
5. Revisions made to the permit to address the burning of two grades of biodiesel in the boiler.

The **ADMINISTRATIVE RECORD**, consisting of the **DRAFT PERMIT** and a summary of the **PROPOSED REVISIONS**, are available for public inspection during regular office hours, Monday through Friday, 7:45 a.m. to 4:15 p.m., at the following locations:

Oahu:

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

Hawaii:

Hawaii District Health Office, Department of Health
1582 Kamehameha Avenue, Hilo, Hawaii 96720

Sanitation Branch, Keakealani Building, Department of Health
79-1020 Haukapila Street, Room 115, Kealahou, Hawaii 96750

All comments on the proposed revisions to 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 by August 21, 2008.

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. At the sole discretion of the Director of Health, 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 records or parts thereof by paying five cents per page copying costs. Please send written requests to the Oahu office of the Clean Air Branch listed above or call Ms. Catherine Lopez at the Clean Air Branch in Honolulu at (808) 586-4200.

Comments on the proposed revisions to the draft permit should address, but need not be limited to, the proposed draft 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.

DOH will make a final decision on the permit after considering all comments and will send notice of the final decision to each person who has submitted comments or requested such notice.

The Department of Health has also recently approved Tradewinds Forest Products' request to initiate construction activities associated with the green veneer mill that are not directly associated with the dryer and the boiler emission units. A copy of the Department of Health's approval and Tradewinds' request can be obtained from the Clean Air Branch.

Chiyo Leinaala Fukino, M.D.
Director of Health