
From: Matsumura, April Mido
Sent: Friday, June 01, 2007 3:31 PM
To: 'Greg Retzlaff'
Cc: 'John_Lague@URSCorp.com'; 'Don Bryan'; Hirai, Nolan S
Subject: RE: Boiler 89% load factor - wood fuel

Greg,

If you take a limit based on ECF as you describe below, it will involve keeping records on boiler operating hours (although my understanding was that the boiler would be operating continuously), load rate per hour, and ECF calculations in order to verify the 89% load permit condition through monitoring and reporting requirements.

As far as air emission requirements are concerned, I am not sure what this 89% limit accomplishes. The reason I discussed this limit with John is that the Tradewinds' application showed emission figures based on an 89% load factor instead of a worst-case potential analysis. John indicated to me that he based calculations on an 89% load because Tradewinds intended that to be a proposed limit. That is why I asked you about it, Greg.

Did you discuss this with John? With the proposed HCl limit keeping emissions below 10 tpy, what is the purpose of the 89% limit, and do you still want it?

Regards,
April

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From: Greg Retzlaff [mailto:retzlaff@sterling.net]
Sent: Friday, June 01, 2007 6:23 AM
To: Matsumura, April Mido
Cc: John_Lague@URSCorp.com; 'Don Bryan'
Subject: RE: Boiler 89% load factor - wood fuel

April

I apologize for my somewhat tardy response to the load factor question you discussed with John several days ago. I wanted to touch base with Don and John before responding and then I was out of my office for two days.

The answer is yes Tradewinds is willing (and expected as John mentioned) to accept a load factor limit of 89%. To be certain there is not a misunderstanding of what is meant by this, we should have called it an Equivalent Capacity Factor because this 89% value is meant to identify periods that we are operating but also identifies different operating levels. For example if we operated one day at 90% of rated load and we operated 22 of 24 hours, or 92% of the time, then our Equivalent Capacity Factor for that day would have been 83% ($0.9 \times 0.92 = 0.828$).

In order to accommodate both operating hours and operating levels, we expect our permit condition limiting our operation to 89% will be expressed in million Btu's/yr. Is that how the permit conditions typically limit operations?

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From: Matsumura, April Mido [mailto:april.matsumura@doh.hawaii.gov]
Sent: Friday, May 25, 2007 5:18 PM
To: Greg Retzlaff
Cc: John_Lague@URSCorp.com; Don Bryan
Subject: Boiler 89% load factor - wood fuel

Hi Greg,

I spoke with John this morning about the boiler emission calcs.
He based his emission calcs on an 89% load factor.
Did you want a load factor as a permit condition or should I just do a recalc based on 100% load to show potential emissions in my report?

Thank you.
April

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