Florida Department of Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Howard Ard
DATE: January 3, 2012
SUBJECT: Evaluation Summary for Department of Management Services, Collins Building 0730062-005-AO, Leon County

We recommend issuing a permit to the Department of Management Services to operate their two boilers in the Collins Building. This permit follows 0730062-004-AO, effective February 29, 2008.

Process Description. This facility consists of two Cleaver-Brooks boilers that provide comfort heating for multiple buildings in the Florida Capitol Complex.

Pollution Control Equipment. These units have no built-in or add-on controls other than good combustion design/practices, and the burning of natural gas as a primary fuel source. May burn distillate oil with a maximum sulfur content of 0.05%, by weight during emergencies or gas curtailment.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions*		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	5.38	N/A	N/A
SO2	N/A	N/A	19.38	N/A	N/A
VOC	N/A	N/A	0.54	N/A	N/A
NOx	N/A	N/A	53.79	N/A	N/A
CO	N/A	N/A	13.45	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
Visible Emissions	40 CFR 60 Subpart Dc	N/A	N/A	Not more than 20% opacity except for 6 minutes of not more than 27%.	

**Note: Emission calculations based on No. 2 fuel oil, 8,760 operating hours per year and 0.05% sulfur, by weight.*

Applicable Rules & Regulations. This source is regulated in accordance with Rule 62-296.406, F.A.C., (Small Boiler Best Available Control Technology) and general air pollution regulations (visible emissions, Objectionable Odors, etc.). This facility's two boilers are also subject to the Federal requirements of 40 CFR Part 60, Subpart Dc. - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Compliance Monitoring. VE tests shall be conducted once, during the 12 months prior to the renewal date of the effective air operating permit (once every five years). If the boilers operated on fuel oil more than 400 hours during the federal fiscal year, VE tests shall be conducted within 30 days of the date in

which the 400 hours was exceeded. The facility must also maintain records to prove compliance with fuel usage and fuel oil sulfur content.

Compliance History. VE tests have been consistently within permitted limits. A review of inspection reports for the facility showed two items of non-compliance were noted during the site inspection conducted on September 2, 2010: 1) failure to perform compliance testing during a fuel consumption period, and 2) failure to submit the required reports for years 2008, 2009 and 2010. Investigation showed these deficiencies were due primarily to a misunderstanding, on the part of DMS personnel, of the conditional testing and reporting requirements for boilers permitted to burn natural gas but allowed to burn fuel oil during gas curtailment. DMS Management immediately corrected these deficiencies and worked with the Department to clarify language in the permit concerning testing and reporting requirements for their boilers. No further action was taken by the Department concerning these of non-compliance issues.

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test.

HA/c