University of West Florida
Pensacola Campus
Facility ID No.: 0330064
Escambia County

Air Operation Permit
Permit No.: 0330064-006-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850/595-8300
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[Electronic file name: 0330064-006-AO.doc]

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Florida Department of Environmental Protection
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160 W. Government Street, Suite 308
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Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

Permittee:
University of West Florida

Permit No.: 0330064-006-AO
Facility ID No.: 0330064
SIC No(s).: 82
Project: Air Operation Permit

This renewal permit is for the operation of the boilers on the Pensacola Campus located at 11000 University Parkway in Pensacola, Escambia County; UTM Coordinates: Zone 16, 479.8 km East and 3379.5 km North; Latitude: 30° 32' 57" North and Longitude: 87° 12' 37" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The following Appendices are attached as part of this permit:
Appendix G-1, General Conditions

Effective Date: March 30, 2011
Renewal Application Due Date: January 30, 2016
Expiration Date: March 30, 2016

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/aj/c

Section I. Facility Information.

This is a renewal of Permit 0330064-005-AO, effective February 8, 2006. The four smaller exempt boilers that were utilized to heat shower water (1 MMBtu/hr unit in Bldg. 54), provide steam to laboratory equipment (0.837 MMBtu/hr unit in Bldg. 58), supply heating for building #90 (0.643 MMBtu/hr unit), and to supplement the campus hot water system and heat recovery system as needed (4 MMBtu/hr unit) have been removed from service.

Construction Permit 0330064-004-AC, effective July 16, 2003 was issued to replace the 62 MMBtu/hr input steam boiler (Boiler No. 1) and the 33.5 MMBtu/hr input steam boiler (Boiler No. 3) with three 32.6 MMBtu/hr hot water boilers. It was determined after initial installation that only two of the new boilers would be necessary to meet the campus' heat requirements. Due to the distribution pumps and piping being sized only for the capacity of two boilers and it being determined that the third boiler was not needed to meet the heating demand, UWF only constructed two of the three proposed boilers.

An additional 8 MMBTU/hr boiler was installed en lieu of one of three 32.6 MMBtu/hr boilers authorized by permit 0330064-004-AC. This boiler is used for summer loads. This boiler is also fueled by natural gas, with No. 2 fuel oil (less than 0.05% sulfur, by volume) as a backup but is unregulated because it is below the threshold size.

Subsection A. Facility Description.

The University of West Florida (UWF), Pensacola Campus consists of multiple building used as an institute of higher learning and recreational activities of adult students in Pensacola, Escambia County.

The regulated emissions unit located at the facility's central plant, Building #40, consists of two 32.6 MMBtu/hr heat input Unilux Model #ZF3000W boilers. These boilers provide hot water heat through a heating loop to the majority of building located on the Pensacola Campus. Both boilers are fueled by natural gas, with No. 2 fuel oil (less than 0.05% sulfur, by volume) as a backup.

The following boilers are determined to be exempt under Rule 62-210.300(3)(a)34., F.A.C.

Building Name	Building No.	Rated Heat Input Capacity Million Btu/hr	Fuel Type
University Commons Nautilus Market	22	0.600	Natural Gas
Central Utility Plant Boiler No. 3	40	8.000	Natural Gas
Health, Leisure & Sports Facility	72	1.500	Natural Gas
Professional Studies Offices	85	2.340	Natural Gas
Facilities Services	90	0.789	Natural Gas
Baseball Locker Rm. Field House	210	0.720	Liquified Petroleum (LP) Gas

Based on the permit application received December 7, 2010, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
005	Two 32.6 MMBtu/hr Unilux hot water boilers

Two 32.6 MMBtu/hr heat input Unilux Model #ZF3000W boilers fueled by natural gas, with No. 2 fuel oil (less than 0.05% sulfur, by volume) as a backup.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.
These documents are on file with permitting authority:
Permit Application received December 7, 2010
Additional Information Request dated December 17, 2010
Additional Information Response received January 14, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

5. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

6. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Paving and maintenance of roads, parking areas and yards.
b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
d) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

[Rule 62-296.320(4)(c), F.A.C.; and permit 0330064-004-AC]

7. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. [Rule 62-4.090, F.A.C.]

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us.

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8300, then press 3, during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
005	Two 32.6 MMBtu/hr Unilux hot water boilers

The regulated emissions unit located at the University of West Florida's (UWF) Pensacola Campus consists of two boilers. These boilers are located at the facility's central plant, Building #40, and provide hot water heat through a heating loop to the majority of buildings located on the Pensacola Campus. Each of these boilers is a 32.6 MMBtu/hr, heat input, gas fired Unilux boiler (Model # ZF3000W). Both of the boilers are fueled by natural gas, with No. 2 fuel oil (less than 0.05 percent sulfur, by volume) as a backup when natural gas is not available for consumption (supply curtailment).

The heat input capacity is between 10 and 100 MMBtu/hour the emission units are subject to federal Rule 40 CFR Part 60, Subpart Dc – "Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units", which was adopted by reference in 62-204.800(7)(b) 4., F.A.C. The facility is also subject to State Rule 62-296.406, F.A.C. – "Fossil Fuel Steam Generators with Less Than 250 MMBtu/Hour Heat Input, New and Existing Emission Units", which limits the opacity of emissions and requires Best Available Control Technology (BACT) determinations for particulate matter (PM) and sulfur dioxides (SO_2). The burning of natural gas as these units' primary fuel and distillate fuel with a sulfur content limit of 0.05%, by weight, during emergency periods (gas supply outages) will meet the State's PM and SO_2 BACT requirements.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable operating rate for each boiler is 32.6 MMBtu per hour, averaged annually. This is the operating rate at which compliance with standards shall be demonstrated. [Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

A.2. Methods of Operation. To comply with Best Available Control technology (BACT) for PM and SO_2, natural gas will be used as the primary fuel, and distillate oil (No. 1 or 2 fuel oil, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98 – "Standard Specification for Fuel Oils") with a sulfur content of 0.05% Sulfur by weight or lower as a backup during periods of emergency, such as natural gas supply outages. [Rules 62-4.160(2), 62-296-.406(2) & (3), F.A.C.; 40 CFR 60.41c & 60.42c(d); permit 0330064-004-AC]

{Permitting Note: The Florida Small-Boiler BACT sulfur content limit of 0.05% is more restrictive and therefore supersedes the 40 CFR 60.42c(d) limit of 0.5%.}

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.3. Opacity Standard. Emissions shall not exceed 20 percent opacity (six-minute average), except for one six-minute period per hour of not more than 27 percent opacity. This opacity standard applies at all times, except during periods of startup, shutdown, or malfunction. [40 CFR 60.43c(c) & (d); Rule 62-296.406(1), F.A.C.; permit 0330064-004-AC.]

Test Methods and Procedures

A.4.a. Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with EPA Method 9 for one hour for each boiler, once during the 12 months prior to the effective air operating permit's renewal date using natural gas, and within 30 days of any boiler being operated on distillate oil. Once an initial one hour EPA Method 9 test has been conducted on each boiler using distillate oil, then a subsequent test using distillate oil shall only be required if the boilers operated on distillate for more than 400 hours during the federal fiscal year. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070, 62-297.310(7 & 8) and 62-297.401(9), F.A.C.; 40 CFR 60.45c(a)8.; Permit 0330064-004-AC]

A.4.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7) F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.4.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Record Keeping and Reporting Requirements

A.5. The Permittee shall record and maintain monthly records containing the quantity of each fuel combusted. These records shall be maintained and made available for inspection by the facility for a minimum of two years following the date of such record. [Rules 40 CFR 60.48c(g) & (i) and EPA Authority letter received on April 19, 2001 (UWF); permit 0330064-004-AC]

A.6. The Permittee shall maintain records of fuel supplier certifications for each shipment of distillate oil received for back-up use. Fuel supplier certification shall include the following information:

1. The name of the oil supplier;
2. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.

These records shall be maintained and made available for inspection by the facility for a minimum of two years following the date of such record.
[40 CFR 60.48c(e)(11) & (i); permit 0330064-004-AC]

A.7. The Permittee shall submit a semi-annual report, to the Department, containing the following:

1. Results of any conducted performance test.
2. Calendar dates covered in the reporting period.
3. Each 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
4. Records of fuel supplier certification as described in. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

Semi-annual reports shall be postmarked by the 30th day following the end of the reporting period. [40 CFR 60.48c(b), (d), & (e); permit 0330064-004-AC]

A.8. The submittal of a semi-annual report for these units is not required if fuel oil (back-up fuel) was not burned during the reporting period. However, even if not fuel oil (back-up fuel) has been burned during the previous reporting semi-annual period and therefore, no report has been submitted for that period, an annual report is required to denote that no fuel oil was consumed during the year. [EPA Determination Request Letter, dated April 3, 2001 and EPA Determination Response letter Received April 23, 2001; permit 0330064-004-AC]

A.9. The permittee shall notify the Department as soon as practical when either of these boilers is switched from burning natural gas to fuel oil, except for during routine short term operational testing periods (no greater than 30 minutes). [Rule 62-4.070, F.A.C.; permit 0330064-004-AC]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent

recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.