# Florida Department of Environmental Protection

## Memorandum

**TO:** Rick Bradburn
**THROUGH:** Armando Sarasua
**FROM:** Angelia Jackson
**DATE:** March 30, 2011
**SUBJECT:** Evaluation Summary for University of West Florida, Pensacola Campus, 0330064-006-AO, Escambia County

We recommend issuing a renewal permit to University of West Florida to operate their Pensacola Campus. This permit follows 0330064-005-AO, effective February 6, 2006.

**Process Description**.
The University of West Florida (UWF), Pensacola Campus consists of multiple buildings 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, gas-fired boilers. These boilers provide hot water heat through a heating loop to the majority of buildings located on the Pensacola Campus.

**Pollution Control Equipment**.
None. BACT; natural gas fuel, with No. 2 fuel oil (less than 0.05% sulfur, by volume) as a backup.

**Environmental Impact**. (**Potential to Emit based on regulated boilers burning No. 2 fuel oil**)

| Airborne Contaminant Emitted | FAC Rule | Estimated Emissions | | Allowable Emissions | |
|---|---|---|---|---|---|
| | | lbs/hr | T/yr | lb/hr | T/yr |
| PM | N/A | N/A | 4.06 | N/A | N/A |
| SO2 | N/A | N/A | 14.64 | N/A | N/A |
| VOC | N/A | N/A | 0.41 | N/A | N/A |
| NOx | N/A | N/A | 40.65 | N/A | N/A |
| CO | N/A | N/A | 10.16 | N/A | N/A |
| Objectionable Odors | 62-296.320(2) | N/A | N/A | None allowed off plant property | |
| VE | N/A | N/A | N/A | Not more than 20% opacity | |

**Applicable Rules & Regulations**.
This two permitted boiler (EU 005) are regulated in accordance with 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.

**Compliance Monitoring**.
Permittee is required to maintain fuel usage records, fuel oil sulfur content records, submit a semi-annual report, and conduct visible emissions testing for at least one hour 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 fired (operated) on distillate oil (back-up fuel). 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.

**Compliance History**.
The May 2010 inspection noted the facility as Minor Non-compliance for the installation of an 8* MMBtu/hr boiler instead of one of three 32.6 MMBtu/hr boilers authorized by permit 0330064-004-AC without notifying the Department. June 2010, the Department issued a warning letter. Boiler determined to be exempt after facility explained why they did not need the third 32.6 MMBtu/hr boiler. Facility had a late submittal of semi annual report. Compliance issues closed without enforcement.
2009 - 2007 Facility inspections noted to be "In - Compliance ".

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

AMJ/c