Pensacola Christian College
Pensacola Campus

Facility ID No. 0330114
Escambia County

Title V Air Operation Permit Renewal

Permit No. 0330114-007-AV
Renewal of Title V Air Operation Permit No. 0330114-006-AV

Permitting and Compliance Authority:

State of Florida
Department of Environmental Protection
Waste Management/Air Resources, Northwest District

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Pensacola, Florida 32502-5740

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May 1, 2013

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Florida Department of Environmental Protection

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Permit No. 0330114-007-AV
Pensacola Campus
Facility ID No. 0330114
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit for the above referenced facility. The existing Pensacola Campus is located in Escambia County at 250 Brent Lane, Pensacola, Florida. UTM Coordinates: Zone 16, 477.548 km East and 3371.010 km North; and, Latitude: 30° 28' 22" North and Longitude: 87° 14' 02" West.

The Title V 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, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

0330114-007-AV Effective Date: May 1, 2013
Renewal Application Due Date: September 18, 2017
Expiration Date: May 1, 2018

/s/
J. Charles Harp
Program Administrator
Waste Management/Air Resources

JCH/rp/m

SECTION I. FACILITY INFORMATION.

This is a renewal of permit 0330114-006-AV, effective June 16, 2008. There have been no construction or revision permits issued since permit 0330114-006-AV.

Subsection A. Facility Description.

Pensacola Christian College (PCC) is a private educational institution consisting of classrooms, dorms, recreational areas, book distribution, food preparation, maintenance, and warehouse space located in Pensacola, Escambia County.

The regulated activity at the facility is primarily a standby generation plant that includes three 1,500 Hp stationary spark ignition IC engines and eight generator units with natural gas-fired stationary compression ignition internal combustion engines. The standby generation plant is utilized for backup power generation, during power outages. A Print Shop (PCC Print Shop, Facility ID 0330271), under separate ownership, is located within the PCC boundaries.

Included in this permit are miscellaneous unregulated/insignificant emission units and/or activities, which include multiple hot water generators and facility cooling towers (Combined Appendices, Appendix U).

Subsection B. Summary of Emissions Units

EU No.	Brief Description
Regulated Emissions Units	
005	Two 1,500 Hp Stationary Spark Ignition Internal Combustion Engines, No. 9 and No. 10 (both started up in January 1988) fueled by natural gas
003	One 1,500 Hp Stationary Spark Ignition Internal Combustion Engine, No. 11 (started up in August 1988) fueled by natural gas
009	Eight 1,818 bhp Stationary Compression Ignition Internal Combustion Engines, Nos. 1 – 8 (started up in May 2005) fueled by natural gas
Unregulated Emissions Units and Activities	
006	Hot Water Generators
007	Cooling Towers

Subsection C. Applicable Regulations

Based on the Title V Air Operation Permit Renewal application received on November 1, 2012, this facility is not a major source of Hazardous Air Pollutants (HAP). 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, does not apply. 40 CFR 60 Subpart JJJJ does not apply as the stationary spark ignition internal combustion engines were operating before June 12, 2006 requirement in 40 CFR 60.4230(a)(4). 40 CFR 60 Subpart IIII does not apply as the stationary compression ignition internal combustion engines with a displacement of less than 30 liters per cylinder were operating before July 11, 2005 requirement in 40 CFR 60.4200(a)(2). The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C., as Potential-to-Emit (PTE) emissions from CO and NO_X are greater than 250 TPY. A summary of applicable regulations is shown in the following table.

Regulation	EU Nos.
Rule 62-4.070, F.A.C.	Facility-wide
Rule 62-4.160(2), F.A.C.	Facility-wide
Rule 62-210.200, F.A.C.	Facility-wide

Rule 62-210.300, 300(2)(a), F.A.C.	003, 005, 009
Rule 62-210.370(3), F.A.C.	Facility-wide
Rule 62-213.205, F.A.C.	Facility-wide
Rule 62-213.440(1), F.A.C.	003, 005, 009
Rule 62-213.440(3), F.A.C.	Facility-wide
Rule 62-296.320(1), (2) & (4), F.A.C.	Facility-wide
Rule 62-297-310, F.A.C.	003, 005, 009
Rule 62-297.620(4), F.A.C.	009
40 CFR 68	Facility-wide
PSD-FL-128	003

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Combined Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General 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 or organic solvents 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. and permit 0330114-004-AC]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. 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. [Rule 62-296.320(4)(c), F.A.C.]
{Permitting Note: From permit application 0330114-007-AV, "Any unconfined particulate matter is very unlikely throughout this facility. All roads and parking lots are paved. The remainder of the property is landscaped and grassed."}

Annual Reports and Fees
See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. A copy of the form and instructions may be obtained electronically at http://www.dep.state.fl.us/air/rules/forms/aor.htm. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]

FW10. Additional and Special Compliance Tests

If any engine of EU Nos. 003, 005, or 009 are used for any other reason than backup power or routine testing/maintenance, the applicant shall contact the Department. This type of operation may result in the addition of new monitoring and/or emissions testing requirements to this permit. In addition, 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. [Rules 62-4.070 and 62-297.310, F.A.C.]

Subsection A. IC ENGINES NO. 9 AND NO. 10

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
005	Two 1,500 Hp Stationary Spark Ignition Internal Combustion Engines, No. 9 and No. 10 (both started up in January 1988)

This emissions unit is comprised of two 1,500 HP stationary spark ignition internal combustion (IC) engines (Engines No. 9 & No.10), each a Waukesha model L7042GSI. Each engine is fueled by natural gas and drives a generator producing 1.1 MW of electricity. Heat generated by Engines No. 9 and No. 10 (EU I.D. 005) and Engine No. 11 (EU I.D. 003) is removed by two 800 ton cooling towers (EU I.D. 007). IC Engines No. 9 and No. 10 are regulated by Rule 62-210.300, F.A.C., and permit AC17-129619, and are not subject to PSD, in accordance with permit AC17-129616. 40 CFR 63 Subpart ZZZZ does not apply as the facility is not a major source of HAPS. 40 CFR 60 Subpart JJJJ does not apply as the engines were operating before June 12, 2006 requirement in 40 CFR 60.4230(a)(4).

There is no periodic NO_X or CO testing (annual VE testing required) based on past NO_X and CO test results, information supplied by the applicant and the manufacturer, and the fact that these engines are rarely operated, except for routine maintenance or tuning. Annual tune-ups are required by a competent service contractor, engine manufacturer representative, or equal substitute. The engines are tuned for equal NO_X/CO emissions (approximately 10 grams per bhp-hr, based on the manufacturer), which based on factory literature is achieved with excess oxygen (O_2) in exhaust of 0.3 percent. Monitoring procedures and record keeping procedures are outlined in the PCC Environmental Compliance Plan (attached).

Essential Potential to Emit (PTE) Parameters

A.1. Capacity: The maximum allowable heat input rate to each internal combustion engine shall not exceed 14.9 million Btu per hour. Maximum gas consumption shall not exceed 700 pounds per hour (each engine). [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit AC17-129619]

A.2. Methods of Operation: The engines shall be fired by natural gas only. [Rules 62-4.160(2) and 62-213.440(1), F.A.C., and permit AC17-129619]

A.3. Hours of Operation: Each engine is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit AC17-129619]

A.4. Emissions Unit Operating Rate Limitation After Testing: See the related testing provisions in Combined Appendices, Appendix TR - Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

A.5. For each internal combustion engine, the manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards (if any) and allowable emissions are listed as per Rule 62-210.300(2)(a), F.A.C.:

Airborne Contaminant Emitted	FAC Rule	Allowable Emissions	
		lb/hr	T/yr[(2)]
NOx	see [(1)] below	34.0	149
VE	see [(1)] below	5% opacity	

(1) Permit AC17-129619
(2) Based on allowable hourly emissions rate and continuous operation. Actual operating hours are much less and dependent on Gulf Power Company's peak power demands.

Test Methods and Procedures

A.6. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60 Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C., and permit AC17-129619]

A.7. Common Testing Requirements: Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Combined Appendices, Appendix TR - Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.8. Annual Compliance Tests Required: During each federal fiscal year (October 1 to September 30), EU 005 shall be tested to demonstrate compliance with the emissions standards for VE. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7), F.A.C. and Permit No. AC17-129619]

A.9. Additional Compliance Test Requirements: NO_X compliance tests shall be performed on IC engine No. 9 and/or IC engine No. 10 when a VE test exceeds 5% opacity. The tests shall be conducted within 60 days of the VE test date that the opacity exceeded 5% to demonstrate compliance with the NO_X emission limit. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

A.10. Permittee shall maintain proper operation and recordkeeping of these engines by following the procedures outlined in the most recent Environmental Compliance Plan (Attached). [Rule 62-4.070, F.A.C., and permit 0330114-003-AV]

Subsection B. IC ENGINE NO. 11

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
003	1,500 hp Stationary Spark Ignition Internal Combustion Engine No. 11 (started up in August 1988)

This emissions unit consists of one 1,500 Hp stationary spark ignition IC engines (Engine No. 11), Waukesha Model L7042GSI. This engine is fueled by natural gas and drives a generator that produces 1.1 mega watts (MW) of electricity. Particulate matter, sulfur dioxide, and volatile organic compound emissions are controlled (minimized) by good combustion practices. Heat generated by Engine No. 11 (EU I.D. 003) and Engine Nos. 9 and 10 (EU I.D. 005) is removed by two 800 ton cooling towers (EU I.D. 007). IC engine No. 11 is regulated by Rule 62-212.400(5), F.A.C., and permit AC17-139470/PSD-FL-128. 40 CFR 63 Subpart ZZZZ does not apply as the facility is not a major source of HAPS. 40 CFR 60 Subpart JJJJ does not apply as the engines were operating before June 12, 2006 requirement in 40 CFR 60.4230(a)(4).

No periodic NO_X or CO testing (annual VE testing required) based on past NO_X and CO test results, information supplied by the applicant and the manufacturer, and the fact that these engines are rarely operated, except for routine maintenance or tuning. Annual tune-ups are required by a competent service contractor, engine manufacturer representative, or equal substitute. The engines are tuned for equal NO_X/CO emissions (approximately 10 grams/bhp-hr, based on the manufacturer), which based on factory literature is achieved with excess oxygen (O_2) in exhaust of 0.3 percent. Monitoring procedures and record keeping procedures are outlined in PCC Environmental Compliance Plan (attached).

Essential Potential to Emit (PTE) Parameters

B.1. Capacity: The maximum allowable heat input rate shall not exceed 14.9 million Btu per hour. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit AC17-139470/PSD-FL-128]

B.2. Methods of Operation: The engine shall be fired by natural gas only. [Rules 62-4.160(2) and 62-213.440(1), F.A.C., and permit AC 17-139470/ PSD-FL-128]

B.3. Hours of Operation: This emissions unit is allowed to operate a maximum of 8,500 hours per year. Permittee shall record hours of operation. These records shall be maintained on site and made available for Department inspection. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit AC17-139470/ PSD-FL-128]

Emission Limitations and Standards

B.4. The manner, nature, volume and frequency of permitted emissions, applicable emissions limiting standards (if any) and allowable emissions are listed as per Rule 62-210.300(2)(a), F.A.C.:

Airborne Contaminant		Allowable Emissions	
Emitted	FAC Rule	lb/hr(2)	T/yr(4)
NO_X	see (1) below	34.0	145
CO	see (1) below	34.0	145
VE	see (1) below	20% opacity	
PM, SO_2, VOC	see (3) below		

(1) Permit AC17-139470/PSD-FL-128.
(2) Based on allowable hourly emissions rate and continuous operation. Actual operating hours are much less and dependent on Gulf Power Company's peak power demands.

(3) These emissions shall be controlled by good combustion practices. [Permit AC17-139470/PSD-FL-128]
(4) Based on maximum annual operating hours of 8,500. [Preliminary Determination dated November 20, 1987 and permit AC17-139470]

Test Methods and Procedures

B.5. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C., and permit AC 17-139470/ PSD-FL-128]

B.6. Common Testing Requirements: Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Combined Appendices, Appendix TR - Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.7. Annual Compliance Tests Required: During each federal fiscal year (October 1to September 30), EU 003 shall be tested to demonstrate compliance with the emissions standards for VE. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7), F.A.C. and Permit No. AC17-129619]

B.8. Additional Compliance Test Requirements: NO_X and CO compliance tests shall be performed on IC engine No. 11 when a VE test exceeds 5% opacity. The tests shall be conducted within 60 days of the VE test date that the opacity exceeded 5% to demonstrate compliance with the NO_X and CO emission limits. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

B.9. Permittee shall maintain proper operation and recordkeeping of these engines by following the procedures outlined in the most recent Environmental Compliance Plan (Attached). [Rule 62-4.070, F.A.C., and permit 0330114-003-AV]

Subsection C. IC ENGINES NO. 1 - 8

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
009	Eight (8) 1,818 bhp Stationary Compression Ignition IC Engines, Nos. 1 – 8 (started up in May 2005)

This emissions unit is comprised of eight emergency generator units each a 1,300 Kilowatt Caterpillar DM5495 powered by Caterpillar engines G3516B fueled by natural gas. Each stationary compression ignition IC engine is a rich burn four-stroke cycle, rated at 1,818 bhp full load, having a maximum heat input of 12.5 MMBtu/hr, with a displacement of less than 30 liters per cylinder. Heat generated by the engines is removed by air-cooled radiators, part of a sealed anti-freeze filled cooling system. 40 CFR 63 Subpart ZZZZ does not apply as the facility is not a major source of HAPS. 40 CFR 60 Subpart IIII does not apply as the engines were operating before July 11, 2005 requirement in 40 CFR 60.4200(a)(2).

Essential Potential to Emit (PTE) Parameters

C.1. Methods of Operation: The engines shall be fired by natural gas only. [Rules 62-4.160(2) and 62-213.440(1), F.A.C., and permit 0330114-004-AC (PSD Avoidance)]

C.2. Hours of Operation: The hours of operation for this emissions unit shall not exceed 2,300 hours per rolling 12-month period per engine. [Rules 62-4.160(2), and 62-210.200(PTE), F.A.C., and permit 0330114-004-AC (PSD Avoidance)]

Emission Limitations and Standards

C.3. Visible Emissions: Visible emissions shall not equal or exceed 5% opacity. [Rule 62-297.620(4), F.A.C., and permit 0330114-004-AC]
{Permitting Note: The above VE limit is more stringent than required, per applicant request.}

C.4. The maximum allowable emission for each engine, in line with the manufacturer data sheet shall not exceed:

		Equivalent Emissions	
Pollutant	Standards (1)	lb/hr	tons/year
Nitrogen Oxides	1.0 gram/bhp-hour	4.01	4.61
Carbon Monoxide	2.6 gram/bhp-hour	10.4	11.98

(1) Based on manufactures tests at steady state engine operating conditions of 77°F, 96.28 kPa (28.43 inches Hg), fuel having a LHV of 925 Btu/ft^3 and with 9.2% exhaust O_2 (dry).

[Rule 62-4.070, F.A.C., and permit 0330114-004-AC (PSD Avoidance)]
{Permitting Note: The emissions standards of this permit ensure that the project does not trigger PSD preconstruction review (past actual emissions to future potential emissions) requirements of Rule 62-212.400, F.A.C.}

Monitoring of Operations

C.5. Permittee shall maintain proper operation and recordkeeping of these engines by following the procedures outlined in the most recently submitted Environmental Compliance Plan (Attached). [Rule 62-4.070, F.A.C., and permit 0330114-004-AC]

Test Methods and Procedures

C.6. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C., and permit 0330114-004-AC]

C.7. Common Testing Requirements: Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Combined Appendices, Appendix TR - Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

C.8. Annual Compliance Tests Required: During each federal fiscal year (October 1 to September 30), IC Engine Nos. 1 - 8 (EU 009) shall be tested to demonstrate compliance with the emissions standards for VE. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7), F.A.C. and Permit No. AC17-129619]

C.9. Additional Compliance Test Requirements: NO_X and CO compliance tests shall be performed on any of IC Engine Nos. 1 - 8 (EU 009) which have a VE test exceeding 5% opacity. The tests shall be conducted within 60 days of the VE test date that the opacity exceeded 5% to demonstrate compliance with NO_X and CO emission limits. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Recordkeeping and Reporting Requirements

C.10. Permittee shall record and maintain for inspection, monthly and rolling 12-month total records showing hours of operation of each engine and the quantity of natural gas combusted in each engine. The records shall be maintained on site for five years and made available as necessary for Department inspection. [Rules 62-4.070, 62-4.160(2), and 62-210.200(PTE), F.A.C., and permit 0330114-004-AC (PSD Avoidance)]