



HEATING UNITS AND GENERAL PURPOSE INTERNAL COMBUSTION ENGINES



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) ☐ COMPLAINT/DISCOVERY (CI) ☐
RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO: _____

AIRS ID#: 1030492 **DATE:** 9/6/06 **ARRIVE:** 10:00 AM **DEPART:** 12:00 PM

FACILITY NAME: Church of Scientology Religious Trust

FACILITY LOCATION: 652 Court Street
Clearwater, FL

RESPONSIBLE OFFICIAL: Bob Wright

PHONE: 727-467-5000

CONTACT NAME: Uli Huber?

PHONE: 727-467-5000

REMITTANCE YEAR: N/A

ENTITLEMENT PERIOD: 2/5/02 / 05/09/07
(effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check ☒ only one box)

☒ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE

PART II: CONTROL TECHNOLOGY/RECORDKEEPING REQUIREMENTS – Rule 62-210.300, F.A.C.

(check ☒ appropriate box(es))

- Does the facility operate any emissions units other than the heating units and general purpose internal combustion engines and emissions units which are exempt from permitting pursuant to the criteria of paragraph 62-210.300(3)(a), or (b), F.A.C., or have been exempted from permitting under Rule 62-4.040, F.A.C.? (Rule 62-210.300(3)(c)3.a., F.A.C.)----- ☐ Yes ☒ No
- Are these heating units or general purpose internal combustion engines subject to the Federal Acid Rain Program as defined at Rule 62-210.200, F.A.C.? (Rule 62-210.300(3)(c)3.b., F.A.C.)----- ☐ Yes ☒ No
- Were visible stack emissions tests conducted during this site visit according to EPA Method 9 (40 CFR 60, Appendix A)?----- ☐ Yes ☒ No
- Pursuant to subparagraph 62-296.320(4)(b)1., F.A.C., are visible emissions from any heating unit(s) or general purpose internal combustion engine(s) equal to or greater than 20% percent opacity as designated as Number 1 on the Ringelmann Chart? (Rule 62-210.300(3)(c)3.c., F.A.C.)----- ☐ Yes ☒ No
- What type of fuel is used by all heating units and general purpose internal combustion engines at this facility? (check ☒ only one box)
a) diesel fuel ☐ b) gasoline ☐ c) natural gas/propane ☒ d) multiple fuels ☐
- Is the total fuel consumption by all heating units and general purpose internal combustion engines within the facility limited to the following thresholds: (Chapter 62-210.300(3)(c)3.d., F.A.C.) (check ☒ only one box)
a) diesel fuel – 250,000 gallons/year (if diesel is the sole source of energy at this facility)?----- ☐ Yes ☒ No
b) gasoline – 22,000 gallons/year (if gasoline is the sole source of energy at this facility)?----- ☐ Yes ☒ No
c) natural gas/propane – 35m standard cubic feet (if gasoline is sole source of energy at this facility)?--- ☒ Yes ☐ No
d) multiple fuels – (equivalent prorated amount)?----- ☐ Yes ☒ No

PART II: CONTROL TECHNOLOGY/RECORDKEEPING REQUIREMENTS – Rule 62-210.300, F.A.C. (continued)

(check ☒ appropriate box(es))

7. Does the owner/operator of the facility maintain records to document the fuel consumption, by type, for each emissions unit? (Rule 62-210.300(3)(c)3.e., F.A.C.)----- ☒ Yes ☐ No
8. Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years? (Rule 62-210.300(3)(c)3.e., F.A.C.)----- ☒ Yes ☐ No
9. Does the owner or operator voluntarily encourage pollution prevention through such measures as: (Rule 62-210.300(4)(b)2.b., F.A.C.)
- a) employing energy conservation measures to reduce the demand for heat from any heating units?----- ☒ Yes ☐ No
- b) performing regular maintenance of heating units to ensure efficient heat recovery?----- ☐ Yes ☐ No
- c) the use of, or considering the use of economizers to recycle waste heat back into the combustion air stream?----- ☒ Yes ☐ No
- d) improved operating procedures to reduce the load on any internal combustion engines?----- ☒ Yes ☐ No
- e) the use of, or considering the use of alternative fuels?----- ☒ Yes ☐ No

PART III: GENERAL CONDITIONS/MAINTENANCE REQUIREMENTS – Rule 62-210.300(4)(e)6., 8., & 12., F.A.C.

(check ☒ appropriate box(es))

1. Does the owner or operator make every reasonable effort to conduct the specific activity authorized by the general permit in a manner that minimizes adverse effects on adjacent property or on public use of the adjacent property, where applicable, and on the environment, including fish, wildlife, natural resources, water quality, or air quality?----- ☒ Yes ☐ No
2. Does the owner or operator maintain the permitted facility, emission unit, or activity in good condition? ☒ Yes ☐ No
3. Has the owner or operator allowed the circumvention of any applicable air pollution control devices?--- ☐ Yes ☒ No
4. Has the owner or operator allowed the emission of air pollutants as the result of the malfunction of, or inoperable condition of applicable air pollution control devices?----- ☐ Yes ☒ No

PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300(4)(d)4., F.A.C.

(check ☒ appropriate box(es))

A. New or Modified Process Equipment

1. Since the last inspection has there been

a) installation of any new process equipment?----- ☐ Yes ☒ No

b) alterations to existing process equipment without replacement?----- ☐ Yes ☒ No

c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- ☐ Yes ☒ No

d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, F.A.C.) to the appropriate DEP or local program office?----- ☐ Yes ☐ No

Mike Ojo Thomas

Inspector's Name (Please Print)

9/6/06

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: During the closing conference, I told Mr. Nick Turker, the emission unit is deemed to be compliance.

Heating Units And General Purpose Internal Combustion Engines – General Permits

FACILITY: Church of Scientology Religious Trust Per_ID: 2302 Central Energy Plant		DISTRICT: Southwest	
ADDRESS: 652 Court Street Clearwater, FL		CONTACT: Nick Turker Phone No: 727-467-5000 or 638-8777	
ARMS No.: 1030492	PERMIT NO.: 1030492-001-AG	EXPIRATION DATE: 05/09/07	
EMISSION UNIT DESCRIPTION: One 436 and one 298 KW KW Lean Burn Waukesha Enginators fired on natural gas. Provides heating and cooling for Fort Harrison hotel, Flag Building, L. Ron Hubbard Hall			
INSPECTION DATE: 9/6/06	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or <input type="checkbox"/> INS_____	COMPLIANCE STATUS: <input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC	
Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly			
A. General Review:			
1.	Permit File Review		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Introduction and Entry		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments: <i>This is inspection was performed in order to determine if this facility has been operating within applicable regulations. Mr. Nick Turker (manager) was present during the facility inspection of the emission unit.</i>			
3.	Is the Authorized Representative still: <u>Bob Wright</u> ?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments:			
4.	Is the facility contact still: Uli Huber?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments:			
I	M	S	
N	N	N	
C	C	C	
B. Specific Conditions			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility operates no emissions units other than the heating units and general purpose internal combustion engines and emissions units which are exempt from permitting pursuant to the criteria of paragraph 62-210.300(3)(a) or (b), F.A.C., or have been exempted from permitting under Rule 62-4.040, F.A.C. [62-210.300(3)(c)3.a., F.A.C.] Comments: <i>Facility operates 255 KW and one 436 KW Lean Burn Waukesha Generator combined with a chiller unit fired on natural gas only. According to Mr. Turker the chiller engine was shutdown due to economic reasons. The emission unit last operated on 8/21/06. He stated the emission unit only operates as back unit when ever power outage takes place.</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None of the heating units or general purpose internal combustion engines is subject to the Federal Acid Rain Program as defined at Rule 62-210.200, F.A.C.. [62-210.300(3)(c)3.b., F.A.C.] Comments: <i>Not applicable.</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Each of the heating units or general purpose internal combustion engines meets the general visible emissions standard of paragraph 62-296.320(4)(b), F.A.C. “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).” [62-210.300(3)(c)3.c., F.A.C.] Comments: <i>The VE test was not performed during this site visit, the EU was not in operation at the time.</i>

Heating Units And General Purpose Internal Combustion Engines – General Permits

I N	M N C	S N C	
			B. Specific Conditions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Total fuel consumption by all heating units and general purpose internal combustion engines within the facility is limited to 250,000 gallons per year of diesel fuel, 22,000 gallons per year of gasoline, 35 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used. [62-210.300(3)(c)3.d., F.A.C.]</p> <p>Comments: Reviewed records for the months of 1/1/05 through 8/31/06 indicated emission unit in compliance. The highest reported annual usage was <u>N/A</u> gallons of diesel; <u>N/A</u> gallons of gasoline; gas usage for generators 0.052100 mmcf of natural gas and boilers 7.071900 mmcf of natural gas. Supporting documentation was available (<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No). See copy of the records is attached as an example of the record format.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator of the facility maintains records to document the fuel consumption, by type, for each emissions unit. The owner or operator shall retain these records, available for Department inspection, for a period of at least five years. [62-210.300(3)(c)3.e., F.A.C.]</p> <p>Comments: : The records were available back to 6/1/04. 12 month consecutive totals <input checked="" type="checkbox"/> were <input type="checkbox"/> were not available. A partial copy of the records are attached as an example of the record format.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator voluntarily encourages pollution prevention through such measures as employing energy conservation measures to reduce the demand for heat from any heating units, maintaining heating units to ensure efficient heat recovery, considering the use of economizers to recycle waste heat back into the combustion air stream, developing operating procedures to reduce the load on any internal combustion engines, and considering the use of alternative fuels. [62-210.300(4)(b)2.b., F.A.C.]</p> <p>Comments: The facility has a maintenance contract for the unit to keep it at maximum efficiency. They installed additional heat recovery heat exchanger are in operation which recover the waste heat from the generator and utilize it to heat the hot water for the Church of Scientology Fort Harrison Ave Hotel, reducing the demand for the natural gas boilers.</p>
I N	M N C	S N C	
			C. Selected General Conditions and Procedures
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Administrative Corrections. Within 30 days of any changes requiring corrections to information contained in the notification form, the owner or operator shall notify the Department in writing. Such changes shall include:</p> <p>a. Any change in the name of the authorized representative or facility address or phone number; or</p> <p>b. Any other similar minor administrative change at the facility or emissions unit.</p> <p>[62-210.300(4)(d)3., F.A.C.]</p> <p>Comments: Not applicable at this time.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Equipment Changes. In case of the installation of new process equipment, alteration of existing process equipment without replacement, or the replacement of existing process equipment with equipment substantially different than that noted on the most recent notification form, the owner or operator shall submit a new and complete general permit notification form with the appropriate fee pursuant to Rule 62-4.050, F.A.C., to the appropriate Department of Environmental Protection district office or local air pollution control program office to which the Department has delegated its permitting authority.</p> <p>[62-210.300(4)(d)3., F.A.C.]</p>

Heating Units And General Purpose Internal Combustion Engines – General Permits

I N	M N C	S N C	
			C. Selected General Conditions and Procedures
			<i>Comments: This is non applicable at this time.</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If, for any reason, the owner or operator of any facility operating under an air general permit pursuant to Rule 62-210.300(4)(a), F.A.C., does not comply with or will be unable to comply with any condition or limitation of the permit, the permittee shall immediately provide the Department with the following information:</p> <ol style="list-style-type: none"> 1. A description of and cause of noncompliance; and 2. The period of noncompliance, including 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 which may result. <p>[62-210.300(4)(e)13., F.A.C.]</p> <p><i>Comments: Not applicable at this time.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Valid Permit</p> <p>Throughout the term of the general permit:</p> <ol style="list-style-type: none"> a. The facility operates no emissions units other than the animal crematory and emissions units which are exempt from permitting pursuant to the criteria of Rule 62-210.300(3)(a) or (b), F.A.C.; b. The facility is not a Title V source as defined in Rule 62-210.200, F.A.C. <p><i>Comments: The permit expires on 5/9/2007.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A permittee's use of a general permit is limited to five years. No later than 30 days prior to the fifth anniversary of the filing of intent to use the general permit, the owner or operator shall submit a new notice of intent which shall contain all current information regarding the facility or emissions unit. Eligibility to use the general permit is not transferable and does not follow a change in ownership of the facility or emissions unit. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The owner shall remain liable for corrective actions that may be required as a result of any violations occurring in the time after the sale or legal transfer of the facility or emissions unit, but before a new owner is entitled to use an air general permit. [General Conditions - 62-210.300(4)(e)1., F.A.C.]</p> <p><i>Comments: The permit expires on 05/09/07. A new notification form is required to be submitted no later than 03/10/07.</i></p>

D. Other:

Closing Conference ☒ Yes ☐ No

Other Comments: During the closing conference, I told Mr. Nick Turker, the emission unit is deemed to be compliance.

Inspector(s): Mike Ojo Thomas, Pinellas County, Air Quality Division

Signature(s) Date: 9/13/06

CONTACT LOG? __Yes__, **ACCESS?** __Yes__, **ARMs?** __Yes__

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