



# RECIPROCATING INTERNAL COMBUSTION ENGINES



## COMPLIANCE INSPECTION CHECKLIST

**INSPECTION TYPE:** ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
 RE-INSPECTION (FUI)  ARMS COMPLAINT NO: \_\_\_\_\_

<b>FACILITY:</b> Nielsen Media Research		<b>DISTRICT:</b>
<b>DBA/Site Name:</b> <b>Nielsen Media</b>		Southwest
<b>ADDRESS:</b> 501 Brooker Creek Boulevard Oldsmar, FL		<b>CONTACT PHONE:</b> 8133663023
<b>ARMS NO:</b>  1030533	<b>PERMIT NO:</b>  1030533-001-AG	<b>Expiration Date:</b> 8/24/2013 <b>Renewal Date:</b> 7/25/2013
		<b>Test Date:</b>

**EMISSION UNIT DESCRIPTION:** Five diesel reciprocating internal combustion engines. 4 purchased in 2002 (DQKC, DQKC, DQKC, DQKC), 1 in 2008 (DQKAB).

<b>INSPECTION DATE:</b> 7/26/13	<b>INSPECTION COMPLIANCE STATUS</b> ( <i>check ? only one box</i> ) <input checked="" type="checkbox"/> ?In Compliance; <input type="checkbox"/> ?Minor Non-Compliance; <input type="checkbox"/> ?Significant Non-Compliance
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**PART I: General Review:**

1.	Permit File Review	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Introduction and Entry  <i>Comments:</i> I met with Frank Krejnicky who provided me with fuel records, answered questions, and escorted me through facility.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3.	Is the Authorized Representative still: <u>Sharon St. Jean</u> ? <i>Comments:</i> The e-mail address is: Sharon.St.Jean@nielsen.com	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.	Is the facility contact still: Frank Krejnicky? <i>Comments:</i> The e-mail address is: frank.krejnickyy@nielsen.com	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.	<b>If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days?</b> [62-210.310(2)(d), F.A.C.]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**PART II: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(4)(d), F.A.C.**  
 (check ? appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

1. Is the facility using any other general permits at this location? ----- [62-210.310(4)(b)1.a., F.A.C.]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. Is the facility subject to any unit-specific applicable requirement? ----- [62-210.310(4)(b)1.b., F.A.C.]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Does the facility operate any other emission unit that is not exempt from permitting pursuant to subsection 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.? ----- [62-210.310(2)a., F.A.C.]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. Was a visible emissions test(s) conducted by the inspector during this site visit according? ----- If the answer to 4. is <u>No</u> , skip a)-b) <b>Note: Emission units were not operating at time of inspection.</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
a) The visible emission test resulted in an opacity of _____% for the highest six minute average.	
b) Did the test indicate the facility is operating in compliance with the = 20% opacity standard? ----- [62296.320(b)1., F.A.C.]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>1. Is the total combined fuel consumption by all reciprocating internal combustion engines at the facility less than or equal to the fuel usages listed below?</p> <p>a) 20,000 gallons of gasoline – usage equals _____ gallons= _____ % of allowed -----</p> <p>b) 250,000 gallons of diesel fuel – usage equals <u>12,962</u> gallons= <u>5.2</u> % of allowed -----</p> <p>c) 1.15 million gallons of propane – usage equals _____ gallons= _____ % of allowed -----</p> <p>d) 40 million standard ft<sup>3</sup> natural gas – usage equals _____ cubic feet= _____ % of allowed -----  _____ % of Total*</p> <p>e) Is the sum of the fuel percentages for all fuels burned by the facility less than or equal to 100 percent of the equivalent prorated amounts*? -----</p> <p>[62-210.310(4)(b)2.a. and b., F.A.C.]</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Is the facility maintaining records to document the fuel <u>consumption</u>, by type, on an annual basis? -----</p> <p>[62-210.310(4)(b)2.c., F.A.C.]</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>3. Are the records available for Department inspection and available for a period of at least five (5) years or to the beginning of operation? -----</p> <p>[62-210.310(4)(b)2.c., F.A.C.]</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>4. Is the facility complying with the objectionable odor prohibition of subsection 62-296.320(2), F.A.C.?-----</p> <p>An upwind/downwind survey of the facility was conducted. The observed parameters were:  Downwind odor level detected (1-10) - _____ 0; Wind direction - E _____ Upwind odor level detected-_____ 0</p> <p>[296.320(2), F.A.C.]</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**PART III: Special Conditions And Procedures**  
**(check ? appropriate box(es), if a shaded box is checked, this would indicate noncompliance)**

<p><b><u>Administrative Changes:</u></b></p>	
<p>1. Were there any changes in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or any other similar minor administrative change at the facility? -----</p> <p>2. Did the facility provide written notification within 30 days of the administrative change? -----</p> <p>[62-210.310(2)(d), F.A.C.]</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

<p><b><u>Permit Effective Period</u></b></p>	
<p>3. Is the general permit for this facility still within the 5 year entitlement period? -----</p> <p>4. Did the facility submit the new re-registration form at least 30 days prior to permit expiration? -----</p> <p>[62-210.310(3)(a), F.A.C.]</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p><b><u>New or Modified Process Equipment / Change in Ownership</u></b></p>	
<p>5. Since the last registration form submittal has there been [62-210.310 (2)(b)2, F.A.C]</p> <p>a) Installation of any new process equipment? -----</p> <p>b) Alterations to existing process equipment without replacement?-----</p> <p>c) Replacement of existing equipment with equipment that is substantially different?-----</p> <p>d) A change in ownership?-----</p> <p>e) If any of the answers to 1a) – 1d) are <b>Yes</b>, a new registration form and appropriate fee should have been submitted 30 days prior to the change. Was a new registration form properly submitted? -----</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No

<p><b><u>Noncompliance Notice:</u></b> - [62-210.310(3)(i), F.A.C.]</p>	
<p>6. Did the facility have any instances where they were unable comply with or will be unable to comply with any condition or limitation of the air general permit? -----</p> <p>If the answer is <b>Yes</b>, proceed to a) and b).</p> <p>a) Did the owner or operator provide immediate notification to the Department? -----</p> <p>b) Did the notification include:</p> <p>1. A description of and cause of noncompliance?-----</p> <p>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? -----</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No

<p><b><u>Maintenance:</u></b></p>	
<p>1. Does the owner or operator maintain the permitted facility, emission unit, or activity in good condition? -----</p> <p>[62-210.310(3)(g), F.A.C.]</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**PART IV: Comments – List comments that provide detail to any violations or clarifies the inspection**

It appears that the facility did not re-register for their Air General permit 30 days prior to expiration [62-210.310(3)(a), F.A.C.]. I verbally warned Mr. Krejnicky to be sure and follow up with performing this requirement. I received an email on 8/2/13 from Sharon St. Jean that he had sent a registration form to FDEP.

The fuel usage records provided by the facility did not clearly identify annual usage totals. The fuel usage was recorded each instance but manual summation and data interpretation was required determine actual usage. I verbally warned Mr. Krejnicky to improve the fuel usage records to clearly demonstrate the consumption on an annual basis as required by 62-210.310(4)(b)2.c., F.A.C. Mr. Krejnicky agreed improve his record spreadsheet to display a total fuel consumption on an annual basis and also to add the fuel type and units to the record. There is only diesel fuel used at the facility.

I informed Mr. Krejnicky that I would provide information about upcoming requirements that may be applicable to his facility under 40 CFR 63 Subpart ZZZZ.

The facility's DQKAB (2008) engine appears compliant with Subpart IIII. EPA Certification # CEX-NRCI-08-21 per initial registration info.

It appears that certain Subpart ZZZZ requirements are due this year including an emission performance test by 10/30/13 for the 4 DQKC (2002) engines per § 63.6612 which would also include notifications per § 63.6645. Additional operating limitations and record keeping requirements appear to be required beginning May 3, 2013. Reports are due for that facility beginning in 2016 for the 2015 year. Follow-up questions are needed to ensure future compliance with Subpart ZZZZ. Hour meter records of emergency and non-emergency usage appear to be required. Maintenance records need to be kept. Requirements to be considered an "emergency" engine need to be understood by the facility and PCAQD. Assurances of specific requirements for non-emergency usage up to 50 hours need to be verified. Agency policy review and source follow-up need to be conducted. It appears that the facility is still in compliance with Subpart ZZZZ at this time.

I spoke with Mr. Sharon St. Jean on 8/5/13 via phone and emailed him information relative to Subpart ZZZZ.

Non-resettable hour meters are not installed on the engines. Hours of operation are recorded in the facility's software program operating the emergency system. The facility does participate in a demand response program with EnerNOC and TECO. The amount of time that the facility has been asked to operate off the grid has been approximately 4 hours in the last year. Specific details about the agreements in the program were unavailable at this time. The facility has not performed any emissions testing at this time according to Mr. St. Jean. The facility has a service contract with Cummings and they are recommending the installation of a catalyst on one of the engines. The facility has had fuel polishing and fuel testing service performed each year.

Brennan Farrington

**Inspector's Name**

7/26/13

**Date of Inspection**

**Inspector's Signature**

~7/2014

**Approximate Date of Next Inspection**