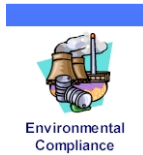




HEATING UNITS AND GENERAL PURPOSE INTERNAL COMBUSTION ENGINES



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1030492 **DATE:** 7-13-10 **ARRIVE:** 2:00 PM **DEPART:** 3:15 PM
FACILITY NAME: Church of Scientology Religious Trust
FACILITY LOCATION: 652 Court Street
 Clearwater, FL
RESPONSIBLE OFFICIAL: Glen E. Stilo **PHONE:** 727-445-4338
CONTACT NAME: Nickolas Tucker? **PHONE:** 727-445-4338
REMITTANCE YEAR: N/A **ENTITLEMENT PERIOD:** 2/5/02 / 4/24/2013
 (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))

1. 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
2. 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
3. Were visible stack emissions tests conducted during this site visit according to EPA Method 9 (40 CFR 60, Appendix A)?----- Yes No
4. 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
5. 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
6. 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)

7-13-10

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: During the closing conference, I told Mr. Nick Tucker, the emission unit is deemed to be non-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: Mr. Nick Turker Phone No: 727-445-4338
ARMS No.: 1030492	PERMIT NO.: 1030492-002-AG	EXPIRATION DATE: 4/24/2013
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: 7/13/2010	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or <input type="checkbox"/> INS_____	COMPLIANCE STATUS: <input type="checkbox"/> IN <input checked="" 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
<i>Comments: This inspection was performed in order to determine if this facility has been operating within applicable regulations. Mr. Nick Turker the manager and Mr. Zoctan Klell the engineer were present during the facility inspection of the emission unit.</i>		
3.	Is the Authorized Representative still: <u>Glen E. Stilo</u> ?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments: Mr. Stilo stills the Authorized Representative.</i>		
4.	Is the facility contact still: Nickolas Tucker?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments: Mr. Nickolas Tucker stills the facility contact.</i>		
I N C	M N C	S N 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.]		
<i>Comments: 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 for maintenance. The emission unit last operated on 7/11/10. 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.]		
<i>Comments: 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.]		
<i>Comments: 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 C	M N C	S N C	B. Specific Conditions
<input type="checkbox"/>	<input checked="" 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><i>Comments: Reviewed records for the months of 1-1-09 to 7-13-10. The highest reported annual usage was _____ gallons of diesel; _____ gallons of gasoline; _____ mmcf of natural gas. Supporting documentation was available (<input type="checkbox"/> Yes or <input type="checkbox"/> No).</i></p> <p><i>Note: The highest reported annual usage was not recorded. Mr. Nick Turker stated on Sunday 11th of July, 2010 they test ran the 436KW generator for 2 hours. He stated they noted that the City of Clearwater gas meter did not register consumption. According to Mr. Turker the emission unit was shutdown and have not run it since. He stated he notified the City of Clearwater's Natural Gas Division to have gas meter replace and have received notification back from the City that it is being addressed and the meter will be replace. Mr. Turker stated they will not run the generators until this issue is corrected. He stated they expected the City of Clearwater to be by this coming Friday, the 16 July 2010.</i></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><i>Comments: : The records were available back to 1/2006. 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.</i></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><i>Comments: The facility has a maintenance contract for the unit to keep it at maximum efficiency. The 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.</i></p>
I N C	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><i>Comments: Not applicable at this time.</i></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: Not applicable at this time.</i>
<input type="checkbox"/>	<input checked="" 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: Church of Scientology Religious Trust failed to notify Pinellas County Air Quality Division of the emission unit gas meter failure to register consumption. The highest reported annual usage was not recorded. Church of Scientology Religious Trust is deemed to be in non-compliance regarding procedures 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 4/24/13.</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 4/24/2013. A new notification form is required to be submitted no later than 2/24/2013.</i></p>

D. Other:

Closing Conference, I told Mr. Nick Turker, the emission unit is deemed to be non-compliance. Yes No

Other Comments: *Church of Scientology Religious Trust failed to notify Pinellas County Air Quality Division of the emission unit gas meter failure to register consumption. The highest reported annual usage was not recorded. Church of Scientology Religious Trust is deemed to be in non-compliance regarding procedures at this time. I gave Mr. Turker of the Church of Scientology Religious Trust a verbal warning, I told him Church of Scientology Religious Trust responsibility to maintain compliance with general permit conditions on a continual basis and if unable to meet compliance for any reason, Church of Scientology Religious Trust responsibility is to inform the AQD of the noncompliance circumstances in accordance with 62-210.300(4)(a), F.A.C.*

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

Signature(s)

Date: 7/14/10

CONTACT LOG? ___yes___, ACCESS? ___yes___, ARMs? ___yes___

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