FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
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PERMITTEE

Walt Disney Parks and Resorts U.S., Inc.
Post Office Box 10000
Lake Buena Vista, Florida 32830

Authorized Representative:
Mr. Lee Schmudde, Vice-President

Air Permit No. 0950111-037-AC
Facility ID No. 0950111
SIC N
Two Hurst Series 500 Steam Boilers
Permit Expires: December 31, 2017

PROJECT

This is the final air construction permit which authorizes the installation, tuning, operation and maintenance of two identically sized gas-fired boilers (Hurst Series 500) with a continuous oxygen trim system in the Fourth Laundry Building at the Walt Disney World Resort Complex. The facility is located in Orange and Osceola Counties at the Walt Disney Resort Area, Lake Buena Vista, Florida. This final permit revision is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). As noted in the Final Determination provided with this final permit, no changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

(DRAFT)

for: Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

JFK/dlr/tbc

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DRAFT PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Lee Schmudde, Walt Disney: (lee.schmudde@disney.com)
Mr. Armando Rodrigues, Walt Disney: (armando.rodrigues@disney.com)
Mr. Rich Bumar, P.E., Walt Disney: (rich.bumar@disney.com)
Mr. Tom Lubozynski, DEP Central District: (tom.lubozynski@dep.state.fl.us)
Mr. Justin Green, DEP Siting Office: (justine.green@dep.state.fl.us)
Ms. Heather Ceron, EPA Region 4: (ceron.heather@epa.gov)
Ms. Lorinda Sheperd, EPA Region 4: (sheperd.lorinda@epa.gov)
Ms. Lynn Scearce, DEP OPC: (lynn.scearce@dep.state.fl.us)
Ms. Alisa Coe, Earth Justice: (acoe@earthjustice.org)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

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FACILITY AND PROJECT DESCRIPTION

The Walt Disney World Resort Complex in Lake Buena Vista is comprised of two different entities under its control: The Walt Disney World Theme Parks and Resorts and Ready Creek Energy Services. The facility is a complex of hotels, theme parks, support facilities, and a utility. The various air pollution sources are boilers, a combined cycle combustion turbine with a natural gas-fired heat recovery steam generator, emergency reciprocating internal combustion engines, paint spray booths and associated operations, dry cleaning, animal crematory, general workshop operations, external combustion oil heaters and hot water heaters.

A list of the regulated emission units (EU) at the facility is given below.

EU No.	Brief Description
Primary Regulated Emissions Units	
020	Laundry Boiler #1
022	Laundry Boiler #3
112	Crawford Model CB800 Animal Crematory
120	Four Diesel Electric Generators Serving the DISC Building
121	Dry Cleaning Machine
122	CI NESHAP Emergency Engines
123	SI NESHAP Emergency Engines
127	CI NSPS Emergency Engines
129	SI NSPS Emergency Engine
131	Two Hurst Series 500 Steam Boilers (new)
088	CCCT with natural gas fired Heat Recovery Steam Generator
124	CI NESHAP Emergency Engines
128	CI NSPS Emergency Engines
130	CI NESHAP Emergency Demand Response Generators

On October 29, 2014, Walt Disney Parks and Resorts U.S., Inc., submitted an air construction permit application to install, tune, operate and maintain two identically sized gas-fired boilers (Hurst Series 500) with a continuous oxygen trim system in the Fourth Laundry Building at the Walt Disney World Resort Complex. The proposed construction involves the installation and operation of the two steam boilers at a new laundry that is under construction. The boilers will be used to provide steam and heat to the laundry process. The two boilers are part of a single emissions unit with two emissions points. These new boilers have been assigned emission unit number 131 in the ARMS database system. The steam boilers are subject to all applicable requirements of 40 CFR 63, Subpart DDDDD, which applies to Industrial, Commercial, or Institutional Boilers.

Parameters for each boiler follow: stack height = 45 feet; exit diameter = 1.33 feet; exit temperature = 173 Fahrenheit; volumetric flow rate (actual cubic feet per minute) = 1,539; exit velocity = 18.5 feet per second; manufacturer: Hurst Boiler & Welding Co., Inc.; Model No. S5-X-150-150; maximum heat input rate = 6.43 MMBtu/hour; BHP = 150.

The Department made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in any significant increases in pollutant emissions.

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REGULATORY CLASSIFICATION

Standard Industrial Classification (SIC) Code: Primary – 7996, Amusement and Recreation Services; Secondary - 4911 – Electrical Generation.

Title I: The facility is identified as a major source of hazardous air pollutants (HAP).

NESHAP: The facility operates units subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 Code of Federal Regulations (CFR) 63.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 CFR 60.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major stationary source in accordance with Rule 62-212.400, F.A.C.

GHG: The facility is identified as a major source of greenhouse gas (GHG) pollutants.

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete, the draft air construction permit, and the Technical Evaluation and Preliminary Determination.

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SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department. The mailing address for the Office of Permitting and Compliance is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Central District Office. The mailing address and phone number are: 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767, Telephone: 407/894-7555, Fax: 407/897-2966.

3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

(a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Title V Permit Revision: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit revision is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit revision, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

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

EU No.	Brief Description
131	Two Hurst Series 500 Steam Boilers

This equipment will be installed in the Fourth Laundry Building at the facility. Parameters for each boiler follow: stack height = 45 feet; exit diameter = 1.33 feet; exit temperature = 173 Fahrenheit; volumetric flow rate (actual cubic feet per minute) = 1,539; exit velocity = 18.5 feet per second; manufacturer: Hurst Boiler & Welding Co., Inc.; Model No. S5-X-150-150; maximum heat input rate = 6.43 MMBtu/hour; BHP = 150. The units are subject to 40 CFR 63, Subpart DDDDD and are considered new, small, natural gas fired with a continuous oxygen trim control system.

EQUIPMENT

1. Steam Boilers. The permittee is authorized to install, tune, operate and maintain two identically sized 6.43 MMBtu/hour gas-fired boilers (Hurst Series 500) with a continuous oxygen trim system that maintains an optimum air to fuel ratio. [0950111-037-AC, Application.]

APPLICABLE STANDARDS AND REGULATIONS

2. NESHAP Subpart DDDDD Applicability. The steam boilers are subject to all applicable requirements of 40 CFR 63, Subpart DDDDD, which applies to Industrial, Commercial, or Institutional Boilers. [40 CFR Part 63, Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, Institutional Boilers and Process Heaters]

3. Compliance Date. The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart DDDDD upon startup of each boiler. [40 CFR 63.7495(a)]

PERFORMANCE RESTRICTIONS

4. Permitted Capacity. The heat input to each steam boiler shall not exceed 6.43 MMBtu per hour while firing natural gas. [Design; Rule 62-210.200, F.A.C. (Definition - PTE); 0950111-037-AC, Application.]

5. Method of Operation - Fuels. The identically sized steam boilers shall be fired solely with pipeline-quality natural gas which shall contain no more than 2.0 grains of sulfur per 100 standard cubic feet (gr S/100 SCF) of natural gas. [Rule 62-210.200, F.A.C. (Definition - PTE); and 0950111-037-AC, Application.]

6. Hours of Operation. Each steam boiler may operate throughout the year (i.e., 8,760 hours per year). [Rule 62-210.200, F.A.C. (Definitions - PTE); 0950111-037-AC, Application.]

WORK PRACTICE STANDARDS

7. Operating Practices. At all times, the permittee shall operate and maintain the steam boilers, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator (Department) that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.7500(a)(3)]

8. Tune-Ups. To demonstrate continuous compliance, the permittee shall conduct a tune-up of the boilers every 5 years as specified in 40 CFR 63.7540. Each 5-year tune-up shall be conducted no more than 61 months after the previous tune-up. [40 CFR 63.7540 and Table 3.]

9. Details of Tune-Ups.

   The permittee shall:

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- Inspect the burner, as applicable, and clean or replace any components of the burner as necessary (the burner inspection may be delayed until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_X requirement to which the unit is subject;
- Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- Maintain on-site and submit, if requested by the Administrator (Department), an annual report containing the following information:
    - The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
    - A description of any corrective actions taken as a part of the tune-up; and
    - The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

[40 CFR 63.7540]

NOTIFICATIONS

10. Initial Notification. The permittee shall submit an Initial Notification to the Department not later than 15 days after the actual date of startup of each steam boiler. Content of the document is specified in 40 CFR 63.9(b)(4) and (5). [40 CFR 63.7545]

11. Notification of Alternate Fuel Use. If the permittee intends to use a fuel other than natural gas during a period of natural gas curtailment or supply interruption, as defined below, the permittee shall submit a notification of alternative fuel use to the Department within 48 hours of the declaration of each period of natural gas curtailment or supply interruption. The notification shall include the following information:
    - Company name and address.
    - Identification of the affected unit.
    - Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began.
    - Type of alternative fuel that the permittee intends to use.
    - Dates when the alternative fuel use is expected to begin and end.
    - *Period of gas curtailment or supply interruption* means a period of time during which the supply of gaseous fuel to an affected boiler is restricted or halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas due to normal market fluctuations not during periods of

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supplier delivery restriction does not constitute a period of natural gas curtailment or supply interruption. On-site gaseous fuel system emergencies or equipment failures qualify as periods of supply interruption when the emergency or failure is beyond the control of the facility.

[40 CFR 63.7545; 40 CFR 63.7575]

12. Changes in Subcategory. If the permittee switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice to the Department of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify:
    - The name of the owner or operator of the affected source, the location of the source, the boilers that have switched fuels, were physically changed, and the date of the notice.
    - The currently applicable subcategory under 40 CFR 63, Subpart DDDDD.
    - The date upon which the fuel switch or physical change occurred.

    [40 CFR 63.7545]

REPORTS

13. Compliance Reports Schedule. The permittee shall submit to the Department a 5-year compliance report as specified below:
    - The first compliance report must cover the period beginning on the compliance date (i.e., startup of each boiler) and ending on July 31 or January 31, whichever date is the first date that occurs at least 5 years after the compliance date.
    - The first compliance report must be postmarked or submitted no later than January 31.
    - Each subsequent compliance report must cover the 5-year periods from January 1 to December 31.
    - Each subsequent compliance report must be postmarked or submitted no later than January 31.

    [40 CFR 63.7550]

14. Compliance Report Content. The permittee shall submit the compliance report containing the information below:
    - Company and Facility name and address.
    - Process unit information, emissions limitations, and operating parameter limitations.
    - Date of report and beginning and ending dates of the reporting period.
    - The total operating time during the reporting period.
    - The date of the most recent tune-up for each unit subject to the requirement to conduct a 5-year tune-up. The date of the most recent burner inspection shall be included if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
    - If there are no deviations from the requirements for work practice standards, a statement shall be included that there were no deviations from the work practice standards during the reporting period.
    - Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

    [40 CFR 63.7550 and Table 9.]

15. Electronic Submission. The permittee shall submit all reports required by Table 9 of this subpart electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (*www.epa.gov/cdx*). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the report shall be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13. At the discretion of the Administrator, the permittee shall also submit these reports to the Administrator in the format specified by the Administrator. [40 CFR 63.7550]

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RECORDS

16. Recordkeeping. The permittee shall keep the following records: A copy of each notification and report that was submitted to comply with 40 CFR 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or compliance report. [40 CFR 63.7555]

17. Alternate Fuels. If the permittee operates a unit designed to burn gas 1 subcategory and uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under this part, other gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR 63 or 40 CFR 60, 40 CFR 61, or 40 CFR 65, the permittee shall keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. [40 CFR 63.7555]

18. Startup and Shutdown. The permittee shall maintain records of the calendar date, time, occurrence and duration of each startup and shutdown and of the types and amounts of fuels used during each startup and shutdown. [40 CFR 63.7555]

19. Form and Duration. The permittee records shall be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).
    - As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
    - The permittee shall keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). Records can be keep off site for the remaining 3 years.

    [40 CFR 63.7560]

APPLICABILITY OF GENERAL PROVISIONS TO SUBPART DDDDD

20. General Provisions. As stated in 40 CFR 63.7565, The permittee shall comply with the applicable General Provisions according to the following:

Citation	Subject	Applies to subpart DDDDD
§63.9	Notification Requirements	Yes.
§63.10(a), (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.

[40 CFR 63.7565; Table 10]

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