



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

June 27, 2008

Mr. Kunle Modupe
The Ritz-Carlton, Sarasota
1111 Ritz-Carlton Drive
Sarasota, Florida 34236

Re: Facility No.: 1150159-001

Dear Mr. Modupe:

The Department has received the Title V General Permit Notification Form for the dry cleaning facility that you submitted on May 27, 2008.

Pursuant to Florida Statutes section 403.814, the authority to operate under general permits commences thirty days after receipt of the registration form unless you have been notified by this office that your facility has not shown entitlement to operate pursuant to the rule provisions.

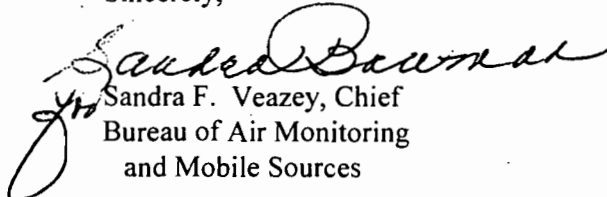
For your information, authority to operate pursuant to Rule 62-210.310 expires after 5 years. Therefore, a new registration form must be received no later than 5 years after the date your notice was received as indicated above. If your general permit rule conditions require testing, such testing must be completed within the time frame specified in the rule...

If you have or expect to have any changes in your mailing address, location address, responsible official, or phone number, please notify the Department at the following address:

Title V General Permits Office
Bureau of Air Monitoring and Mobile Sources MS 5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

If there are any changes in the facility status, including change of operating parameters or equipment, or if you have any additional questions regarding the Title V General Permit Program, please contact the district or local air program compliance inspector in your area.

Sincerely,


Sandra F. Veazey, Chief
Bureau of Air Monitoring
and Mobile Sources

SFV/pg

cc: Mr. John Hickey, Sarasota District

NO ACTIVITY FOR FACILITY ✓
EMISSION FEE DATES
SOC REPORTS.....
COMP. STATUS - SNC MNC IN

*No Activity Exist for this
facility.*

Insp - Sarasota Co - SW - J. Adkey

PERCHLOROETHYLENE DRY CLEANER
AIR GENERAL PERMIT NOTIFICATION FORM

RECEIVED
MAY 27 2008
Bureau of Air, Water,
& Mobile Sources

Part III. Notification of Intent to Use General Permit

Prior to filling out this form, please read the instructions provided at the end of the form. Send completed form to the address listed in the instructions and keep a copy of the form for your files.

Facility Name and Location

1. Facility Owner/Company Name (Name of corporation, agency, or individual owner): <i>Ritz-Carlton Hotel Company</i>
2. Site Name (For example, plant name or number): <i>Sarasota</i>
3. Hazardous Waste Generator Identification Number:
4. Facility Location: Street Address: <i>1111 Ritz-Carlton Dr</i> City: <i>Sarasota</i> County: <i>Sarasota</i> Zip Code: <i>34236</i>
5. Facility Identification Number (DEP Use ONLY - do not fill in): <i>1150159-001</i>

Responsible Official

6. Name and Title of Responsible Official: Name: <i>MODUPE, KUNLE</i> Title: <i>HOTEL MANAGER</i>
7. Responsible Official Mailing Address: Organization/Firm: <i>The Ritz-Carlton, Sarasota</i> Street Address: <i>1111 Ritz-Carlton Drive</i> City: <i>Sarasota</i> County: <i>Sarasota</i> Zip Code: <i>34236</i>
8. Responsible Official Telephone Number: Telephone: <i>(941) 309-2004</i> Fax: <i>(941) 309-2791</i>

Facility Contact (If different from Responsible Official)

9. Name and Title of Facility Contact (For example, plant manager): <i>RONALD PIERRE-PAUL</i>
10. Facility Contact Address: Street Address: <i>1111 Ritz-Carlton Dr</i> City: <i>SARASOTA</i> County: <i>SARASOTA</i> Zip Code: <i>34236</i>
11. Facility Contact Telephone Number: Telephone: <i>(941) 309-2221</i> Fax: <i>(941) 309-2100</i>

Facility Information

1.(a) DRY-TO-DRY MACHINES ONLY

How many dry-to-dry machines do you have on-site? [1]

For each dry-to-dry machine on-site, please provide the following information:

Date Initially Purchased From Manufacturer	Status (circle one)	Control Device Required* (circle one)	Date Control Device Installed (if already included at time of purchase, write "SAME")
<u>2001</u>	<u>Existing</u> /New	RC/ <u>CA</u> /None required	<u>Same</u>
_____	Existing/ <u>New</u>	RC/CA/None required	_____
_____	Existing/ <u>New</u>	RC/CA/None required	_____

*CONTROL DEVICE KEY: RC = refrigerated condenser CA = carbon adsorber

1.(b) TRANSFER MACHINES ONLY

How many washers do you have on-site? [N/A]

How many dryers/reclaimers do you have on-site? [N/A]

If the transfer machine was purchased from the manufacturer prior to or on December 9, 1991, it is an **EXISTING** unit. If the transfer machine was purchased from the manufacturer between December 9, 1991 and September 22, 1993, it is a **NEW** unit (no units purchased after September 22, 1993 are allowed to operate under this general permit). For each transfer machine on-site, please provide the following information:

Date Initially Purchased From Manufacturer	Status (circle one)	Control Device Required* (circle one)	Date Control Device Installed (if already included at time of purchase, write "SAME")
_____	Existing/ <u>New</u>	RC/CA/None required	_____
_____	Existing/ <u>New</u>	RC/CA/None required	_____
_____	Existing/ <u>New</u>	RC/CA/None required	_____

*CONTROL DEVICE KEY: RC = refrigerated condenser CA = carbon adsorber

2.(a) How much perchloroethylene (perc) have you used within the last 12 months?

• [60] gallons (You must fill this in)

(b) If less than 12 months, how many? [] months

Check why it is less than 12 months: New owner: [] Did not keep records: []

New store: [] New machine []

Unopened store [] (date of expected opening _____)

3. What is the facility's source classification based on the definitions found in section (3) of Part II? Indicate with an "X". Select one classification only.)

- Small Area Source
- Dry-to-dry machines only on-site (used less than 140 gallons of perc per year)
 - Transfer only on-site (used less than 200 gallons of perc per year)
 - Both machine types on-site (used less than 140 gallons of perc per year)
- Large Area Source
- Dry-to-dry machines only on-site (used 140 - 2,100 gallons of perc per year)
 - Transfer only on-site (used 200 - 1,800 gallons of perc per year)
 - Both machine types on-site (used 140 - 1,800 gallons of perc per year)

4. What control technology is required on machines pursuant to section (5) of Part II of this notification form? (Indicate with an "X".)

- | | |
|--|---|
| <u>Existing machines at small area source</u>
(NONE REQUIRED) <input checked="" type="checkbox"/> | <u>New machines at small area source</u>
Refrigerated condenser <input type="checkbox"/> |
| <u>Existing machines at large area source</u>
Carbon adsorber <input type="checkbox"/>
Refrigerated condenser <input type="checkbox"/> | <u>New machines at large area source</u>
Refrigerated condenser <input type="checkbox"/> |

5. A facility which contains non-exempt emissions units shall not be eligible to use the general permit pursuant to Rule 62-213.300, F.A.C. Verify that all steam and hot water generating units on-site meet the following exemption criteria or that no such units exist on-site (see attached memo for the criteria).

All steam and hot water generating units exempt OR
No such units on-site

How many boilers do you have on-site? 0 { 1 Laundry steam boiler 70 HP "5400 therms per month"
5 Domestic hot water boilers 12HP "1,450 therm per month"

For each boiler, indicate its horsepower (HP) rating: [] [] []

What type of fuel do you use? propane natural gas
 No. 2 fuel oil No. 4 fuel oil
 No. 6 fuel oil Other (please list) _____

6. Equipment Monitoring and Recordkeeping Information

Check all logs which are required to be kept on-site in accordance with the requirements of this general permit:

- (a) Purchase receipts and solvent purchases/solvent addition log
- (b) Leak detection inspection and repair
- (c) Refrigerated condenser temperature monitoring
- (d) Carbon adsorber exhaust perc concentration monitoring
- (e) Startup, shutdown, malfunction plan

7. Surrender of Existing DEP Air Permit(s)

Please indicate with an "X" the appropriate selection:

- I hereby surrender all existing DEP air permits authorizing operation of the facility indicated in this notification form; the permit number(s) are _____
- No DEP air permits currently exist for the operation of the facility indicated in this notification form.

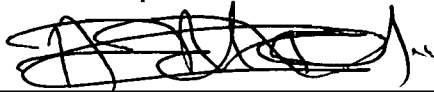
Responsible Official Certification

I, the undersigned, am the responsible official, as defined in Part II of this form, of the facility addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described above so as to comply with all terms and conditions of this general permit as set forth in Part II of this notification form.

I will promptly notify the Department of any changes to the information contained in this notification.

KUNLE MADUPE

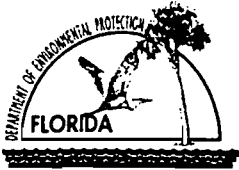
Print name of responsible official



Signature

5/12/08

Date



Department of Environmental Protection

Division of Air Resources Management

PERCHLOROETHYLENE DRY CLEANER
AIR GENERAL PERMIT NOTIFICATION FORM

Part I. Procedures For Use of General Permit

- (1) Eligibility Determination.** The Department of Environmental Protection has established a Title V air general permit under Rule 62-213.300(1)(a), F.A.C., for perchloroethylene dry cleaning facilities, the terms and conditions of which are listed in Part II of this Perchloroethylene Dry Cleaner Air General Permit Notification Form. A perchloroethylene dry cleaning facility may use this Title V air general permit provided the facility meets the eligibility criteria set forth in the rule and, throughout the term of the general permit, maintains its eligibility to use the general permit and complies with all terms and conditions of the general permit. The responsible official of the perchloroethylene dry cleaning facility shall determine the facility's eligibility for the Title V air general permit and notify the Department of intent to use the general permit.
- (a) A perchloroethylene dry cleaning facility is eligible to operate under the terms and conditions of the Title V air general permit established at Rule 62-213.300(1)(a), F.A.C., provided the responsible official has submitted a completed Part III of this notification form to the Department at least 30 days prior to beginning operations under the general permit and, throughout the term of the general permit, all of the following conditions are met:
1. The facility operates no emissions units other than perchloroethylene dry cleaning systems and emissions units which are considered insignificant pursuant to the criteria of Rule 62-213.300(2)(a)1., F.A.C., set forth in paragraph (1)(b);
 2. The facility is classified as a small or large area source pursuant to 40 CFR Part 63, Subpart M; that is, the facility is a Title V source by virtue of being subject to 40 CFR Part 63, Subpart M, but does not emit any pollutant in a major amount as set forth in paragraphs (a) through (e) of the definition of "major source of air pollution" at Rule 62-210.200, F.A.C.; and
 3. The facility complies with all general conditions of Rule 62-213.300(3), F.A.C., set forth in Part II of this notification form, and all requirements of 40 CFR Part 63, Subparts A and M, as applicable, also set forth in Part II of the notification form.
- (b) No facility which contains an emissions unit, other than perchloroethylene dry cleaning systems or a unit considered insignificant pursuant to this paragraph, shall be eligible to use this air general permit. No facility is eligible to use more than one air general permit. An emissions unit or activity shall be considered insignificant if all of the following criteria are met:
1. The emissions unit or activity would be subject to no unit-specific applicable requirement.
 2. The emissions unit or activity would neither emit nor have the potential to emit:
 - a. 500 pounds per year or more of lead and lead compounds expressed as lead;
 - b. 1,000 pounds per year or more of any hazardous air pollutants;
 - c. 2,500 pounds per year or more of total hazardous air pollutants; or
 - d. 5.0 tons per year or more each of any other regulated pollutants.
 3. The emissions unit or activity, in combination with other units and activities at the facility, would neither cause the facility to emit nor have the potential to emit:
 - a. 100 tons per year or more of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, or volatile organic compounds;
 - b. 5 tons per year or more of lead and lead compounds expressed as lead;
 - c. 10 tons per year or more of any hazardous air pollutant;
 - d. 25 tons per year or more of total hazardous air pollutants; or

Dry Cleaner { Forenta Petite
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Model P35 EC
Serial #
104B10434

- e. 100 tons per year or more of any other regulated pollutant.
 - (c) Any facility that would use a Title V air general permit under Rule 62-213.300, F.A.C., must surrender all existing air permits authorizing the operation of the facility.
 - (d) If a facility at any time becomes ineligible for the use of the Title V air general permit and is subject to the source-specific Title V air operation permit requirements of Chapter 62-213, F.A.C., it shall be subject to enforcement action for operating without an air operation permit.
 - (e) Notwithstanding the shield provisions of Rule 62-213.460, F.A.C., any facility utilizing a Title V air general permit will be subject to enforcement action for operation without a permit under Chapter 62-213, F.A.C., if it is determined to be initially ineligible for the air general permit which is being utilized.
- (2) Notification.** For each facility intending to operate under the provisions of this Title V air general permit, the responsible official must complete and submit Part III of this Perchloroethylene Dry Cleaner Air General Permit Notification Form (DEP Form No. 62-213.900(2)) to give notice to the Department of intent to use such permit.
- (3) Administrative Corrections.** Within 30 days of any changes requiring corrections to information contained in this notification form, the responsible official shall notify the Department in writing. Such changes shall include:
- (a) Any change in name of the responsible official or facility address or phone number;
 - (b) A change in facility status requiring more frequent monitoring or reporting by the responsible official from that noted on the most recent notification form; and
 - (c) Any other similar minor administrative change at the facility.
- (4) Violation of Permit.** This Title V air general permit is valid only for the specific activity indicated. Any deviation from the specified activity and the conditions for undertaking that activity is a violation of the permit. The responsible official is placed on notice that violation of the permit constitutes grounds for revocation and suspension pursuant to Rules 62-4.100 and 62-4.530(4), F.A.C., and initiation of enforcement action pursuant to s. 403.141 through 403.161, F.S. No revocation shall become effective except after notice is served by personal service, certified mail, or newspaper notice pursuant to Section 120.60(5), F.S., upon the person or persons named therein and a hearing held, if requested within the time specified in the notice. The notice shall specify the provision of the law or rule alleged to be violated, or the permit condition or Department order alleged to be violated, and the facts alleged to constitute a violation thereof.
- (5) Nullification of Eligibility.** Eligibility for use of a Title V air general permit is automatically nullified by:
- (a) Submission of false or inaccurate information in the notification form for use of the Title V air general permit or in the required reports;
 - (b) Refusal of lawful inspection by Department staff;
 - (c) Failure to submit operational reports or other information required by the general permit; or
 - (d) Failure to timely pay the required annual emissions fee, penalty, or interest.
- (6) Use of Permit.** Any facility eligible to operate under the terms of a Title V air general permit may use the permit 30 days after giving notice to the Department without any agency action.

PERCHLOROETHYLENE DRY CLEANER
AIR GENERAL PERMIT NOTIFICATION FORM

Part II. Permit Terms and Conditions
(Keep this Part onsite for use by facility staff.)

- (1) **Applicability.** This part of the Perchloroethylene Dry Cleaner Air General Permit Notification Form establishes the terms and conditions of this Title V air general permit. Throughout the term of this air general permit, the responsible official shall ensure that the facility maintains its eligibility to use the general permit and complies with all general conditions of Rule 62-213.300(3), F.A.C., set forth below, and all requirements of 40 CFR Part 63, Subparts A and M, as applicable, also set forth in this part of the notification form.
- (2) **General Conditions.** All terms, conditions, requirements, limitations, and restrictions set forth in Rule 62-213.300(3), F.A.C., and listed below (Rule 62-213.300(3)(a) through (s), F.A.C.) are "general permit conditions" and are binding upon the owner or operator and upon the responsible official of the facility utilizing this Title V air general permit.
- (a) The duration of this general permit is five years. No later than 30 days prior to the fifth anniversary of the filing of intent to use this general permit, the responsible official shall submit a new notice of intent which shall contain all current information regarding the facility. The general permit is not transferable and does not follow a change in ownership of the facility. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the responsible official shall notify the Department.
 - (b) The owner or operator of the facility must, upon written notice from the Department, submit payment of an annual operation fee in the amount of \$50.00. This fee is due and payable annually between January 15 and March 1 for the preceding year which the facility was in operation and subject to the requirements of this general permit.
 - (c) This general permit is valid only for the specific activity indicated. Any deviation from the specified activity and the conditions for undertaking that activity shall constitute a violation of the permit.
 - (d) This general permit does not convey any vested rights or any exclusive privileges, nor does it authorize any injury to public or private property nor any invasion of personal rights. It does not authorize any infringement of federal, state, or local laws or regulations.
 - (e) This general permit does not relieve the responsible official or the owner or operator of the facility from liability and penalties when the operation of the permitted activity causes harm or injury to human health or welfare; causes harm or injury to animal, plant or aquatic life; or causes harm or injury to property. It does not allow the responsible official, owner, or operator to cause pollution in contravention of Florida law.
 - (f) This general permit conveys no title to land or water, nor does it constitute state recognition or acknowledgment of title.
 - (g) The responsible official shall make every reasonable effort to conduct the specific activity authorized by this general permit in a manner that will minimize any 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.
 - (h) The responsible official shall allow a duly authorized representative of the Department access to the permitted facility or activity at reasonable times to inspect and test, upon presentation of credentials or other documents as may be required by law, to determine compliance with this general permit and Department rules.
 - (i) The responsible official shall maintain any permitted facility or activity in good condition.

- (j) This general permit shall be effective until suspended, revoked, surrendered, expired, or nullified pursuant to Rule 62-213.300, F.A.C.

(k) Monitoring and Related Recordkeeping and Reporting Requirements.

1. The responsible official shall maintain records of monitoring information that specify the date, place, time, and operating conditions of measurement; the methodology used; the company or entity which performed the monitoring; and the analytical results. These shall include all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
2. The responsible official shall retain records of all monitoring data and supporting information for a period of at least five years from the date of collection.
3. The responsible official shall keep records in which all occurrences of deviations from any specific monitoring requirements and from the procedures of any startup, shutdown, and malfunction plan required pursuant to paragraph (2)(1), shall be clearly identified. Reports of these deviations shall be submitted to the Department during facility inspections and also submitted with the annual compliance certification as required by paragraph (2)(n)2. The responsible official shall certify each report as true, accurate, and complete.
4. The responsible official shall ensure that the Department is promptly notified of deviations from any specific monitoring requirements, including those attributable to upset conditions. Notification shall include the probable cause of such deviations and any corrective actions or preventive measures taken, except that notification shall not be required of actions taken consistent with any startup, shutdown, and malfunction plan required pursuant to paragraph (2)(1). Notification shall be provided within one working day of occurrence of the deviation and may be given by telephone.

(l) Operation and Maintenance Requirements.

1. The responsible official shall maintain on-site a startup, shutdown, and malfunction plan for the facility that describes, in detail, procedures for operating and maintaining the equipment during periods of startup, shutdown, and malfunction. The plan may be in the form of an equipment operation manual and shall also specify corrective action for malfunctioning process and air pollution control equipment.
2. During periods of startup, shutdown, or malfunction, the responsible official shall operate and maintain equipment in accordance with the procedures specified in the plan. Records of compliance with the plan shall be kept on-site for a minimum of five years and shall contain a certification statement signed by the responsible official that the documentation is true, accurate, and complete, based upon information and belief formed after reasonable inquiry.
3. If any action is taken which is inconsistent with the plan, the responsible official shall record and report the actions taken in accordance with the requirements of paragraph (2)(k)3. and 4.. The record shall explain the circumstances of the event, the reason for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred. Taking actions inconsistent with those in the plan constitutes a violation of a permit condition and shall be subject to the provisions of Part I, paragraph (4).

(m) Compliance Plan Requirements.

1. For each applicable permit condition with which the facility is not in compliance at the time of giving notice to the Department of intent to use this general permit and for which the facility has not come into compliance within 30 days after the giving of such notice, the responsible official shall submit to the Department a compliance plan. The compliance plan shall contain measurable and enforceable milestones, including specific dates for completion of each milestone.

2. The responsible official shall notify the Department in writing, within 15 days after the date for completion of each milestone, detailing the achievement of compliance, of progress achieved, requirements met or unmet, corrective measures adopted, and an explanation of any measures not met by the completion date for the compliance milestone. The responsible official shall certify that such notice is complete and accurate. Any deviation from the compliance plan shall constitute a violation of the permit condition and shall be subject to the provisions of Rule 62-213.300(2)(d), F.A.C.
- (n) Compliance Certification.
1. For each applicable requirement with which the facility is in compliance, the responsible official shall submit a statement certifying such compliance to the Department annually. The responsible official shall certify each statement as true, accurate, and complete.
 2. The statement of compliance shall identify each term or condition of the permit with which the facility has remained in compliance during the period covered by the statement and shall specify the method used to demonstrate compliance. It shall identify each term or condition of the permit with which the facility has not been in continuous compliance during that reporting period. It shall also include the monitoring report required pursuant to paragraph (3)(k)3.
 3. For those terms or conditions which the facility has not been in continuous compliance during any reporting period, the statement shall include the exact period of non-compliance, actions taken to achieve compliance, and the method used to demonstrate compliance.
- (o) This general permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C.
- (p) Refrigerant Requirements. Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A, Appendices A and B, which are adopted and incorporated by reference in Rule 62-204.800, F.A.C., shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, reporting and recordkeeping requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F, adopted and incorporated in Rule 62-204.800, F.A.C. No person shall knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82, Subpart F.
- (q) This general permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C.
- (r) No person shall circumvent any air pollution control device or allow the emission of air pollutants without the proper operation of all applicable air pollution control devices.
- (s) All reports and notices submitted by the facility and all records required to be maintained according to paragraph (2) (k) 3., shall contain a certification statement signed by the responsible official that the documentation is true, accurate, and complete, based upon the information and belief formed after reasonable inquiry.
- (3) Definitions.** The following words and phrases, when used in this notification form, shall have the following meanings:
- (a) "Ancillary Equipment" - The equipment used with a dry cleaning machine in a dry cleaning system, including emission control devices, pumps, filters, muck cookers, stills, solvent tanks, solvent containers, water separators, exhaust dampers, diverter valves, interconnecting piping, hoses, and ducts.
 - (b) "Articles" - Any clothing, garments, textiles, fabrics, and leather goods that are dry cleaned.

- (c) "Area Source" - A perchloroethylene dry cleaning facility which consumes an amount of perchloroethylene less than or equal to 2,100 gallons per year for dry-to-dry machines only, or consumes less than or equal to 1,800 gallons per year and utilizes either only transfer or both dry-to-dry and transfer machines on-site, where the amount of perchloroethylene consumed is determined by purchase receipts or by the solvent consumption log in accordance with the requirements of paragraph (6) of this Part.
- (d) "Biweekly" - Any consecutive 14-day period of time.
- (e) "Carbon Adsorber" - A bed of activated carbon into which an air-perchloroethylene gas-vapor stream is routed and which adsorbs the perchloroethylene on the carbon.
- (f) "Coin-operated Dry Cleaning Machine" - A dry cleaning machine that is operated solely by the customer.
- (g) "Colorimetric Detector Tube" - A glass tube (sealed prior to use) containing material impregnated with a chemical that is sensitive to perchloroethylene and is designed to measure the concentration of perchloroethylene in air.
- (h) "Construction" - The fabrication (on-site), erection, or installation of a dry cleaning system.
- (i) "Control Device" - Any device used to minimize perchloroethylene emissions, such as a refrigerated condenser or a carbon adsorber.
- (j) "Desorption" - The regeneration of a carbon adsorber by removal of the perchloroethylene adsorbed on the carbon.
- (k) "Diverter Valve" - A flow control device that prevents room air from passing through a refrigerated condenser when the door of the dry cleaning machine is open.
- (l) "Dry Cleaning" - The process of cleaning articles using perchloroethylene.
- (m) "Dry Cleaning Cycle" - The washing and drying of articles in a dry-to-dry machine or transfer machine system.
- (n) "Dry Cleaning Facility" - An establishment with one or more dry cleaning systems.
- (o) "Dry Cleaning Machine" - A dry-to-dry machine or each machine of a transfer machine system.
- (p) "Dry Cleaning Machine Drum" - The perforated container inside the dry cleaning machine that holds the articles during drycleaning.
- (q) "Dry Cleaning System" - A dry-to-dry machine and its ancillary equipment or a transfer machine system and its ancillary equipment.
- (r) "Dryer" - A machine used to remove perchloroethylene from articles by tumbling them in a heated air stream (see reclaimer).
- (s) "Dry-to-dry Machine" - A one-machine dry cleaning operation in which washing and drying are performed in the same machine.
- (t) "Episodic Exceedance" - Any exceedance of the perchloroethylene solvent consumption level which occurs three years or more after the most recent prior exceedance of the same type.
- (u) "Emissions Unit" - Any part or activity of a facility that emits or has the potential to emit any air pollutant.
- (v) "Exhaust Damper" - A flow control device that prevents the air-perchloroethylene gas-vapor stream from exiting the drycleaning machine into a carbon adsorber before room air is drawn into the dry cleaning machine.
- (w) "Existing" - Dry cleaning machines which were manufactured or initially purchased from the manufacturer on or before December 9, 1991.

- (x) "Filter" - A porous device through which perchloroethylene is passed to remove contaminants in suspension. Examples include lint filter (button trap), cartridge filter, tubular filter, regenerative filter, prefilter, polishing filter, and spin disc filter.
- (y) "Heating Coil" - A device used to heat the air stream circulated from the dry cleaning machine drum, after perchloroethylene has been condensed from the air stream and before the stream reenters the dry cleaning machine drum.
- (z) "Large Area Source" - A dry cleaning facility which:
 1. Contains only dry-to-dry machines and consumes equal to or between 140 and 2,100 gallons per year of perchloroethylene.
 2. Contains only transfer machines and consumes equal to or between 200 and 1,800 gallons per year of perchloroethylene.
 3. Contains both dry-to-dry and transfer machines and consumes equal to or between 140 and 1,800 gallons per year of perchloroethylene.
- (aa) "Major Source" - A dry cleaning facility which consumes an amount of perchloroethylene exceeding 2,100 gallons per year for dry-to-dry machines only or exceeding 1,800 gallons per year for either transfer machines only or facilities containing both dry-to-dry and transfer machines.
- (bb) "Muck Cooker" - A device for heating perchloroethylene-laden waste material to volatilize and recover perchloroethylene.
- (cc) "New" - Dry cleaning machines which were manufactured or initially purchased from the manufacturer after December 9, 1991.
- (dd) "Perceptible Leaks" - Any perchloroethylene vapor or liquid leaks that are obvious from:
 1. The odor of perchloroethylene.
 2. Visual observation, such as of pools or droplets of liquid.
 3. The detection of gas flow by passing fingers over the surface of the equipment.
- (ee) "Perchloroethylene Consumption" - The total volume of perchloroethylene purchased yearly by the facility or added to the machine, based upon purchase receipts or other reliable measures.
- (ff) "Reclaimer" - A machine used to remove perchloroethylene from articles by tumbling them in a heated air stream (see dryer).
- (gg) "Reconstruction" - The replacement of a washer, dryer, or reclaimer; or replacement of any components of a dry cleaning system to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new system.
- (hh) "Refrigerated Condenser" - A vapor recovery system into which an air-perchloroethylene gas-vapor stream is routed and the perchloroethylene is condensed by cooling the gas-vapor stream.
- (ii) "Refrigerated Condenser Coil" - The coil containing the chilled liquid used to cool and condense the perchloroethylene.
- (jj) "Responsible Official" - One of the following:
 1. For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.;
 2. For a partnership: a general partner;
 3. For a sole proprietorship: the owner;

4. For a municipality, state, federal, or other public agency: either a principal executive officer or ranking official.
- (kk) "Small Area Source" - A dry cleaning facility which:
1. Contains only dry-to-dry machines and consumes less than 140 gallons per year of perchloroethylene.
 2. Contains only transfer machines and consumes less than 200 gallons per year of perchloroethylene.
 3. Contains both dry-to-dry and transfer machines and consumes less than 140 gallons per year of perchloroethylene.
- (ll) "Source" - Each dry cleaning facility.
- (mm) "Still" - Any device used to volatilize and recover perchloroethylene from contaminated perchloroethylene.
- (nn) "Temperature Sensor" - A thermometer or thermocouple used to measure temperature.
- (oo) "Transfer Machine System" - A multiple-machine dry cleaning operation in which washing and drying are performed in different machines. Examples include:
1. A washer and dryer(s)
 2. A washer and reclaimer(s), and/or
 3. A dry-to-dry machine and reclaimer(s) and/or dryer(s).
- (pp) "Washer" - A machine used to clean articles by immersing them in perchloroethylene. This includes a dry-to-dry machine when used with a reclaimer.
- (qq) "Water Separator" - A device used to recover perchloroethylene from a water-perchloroethylene mixture.
- (rr) "Year or Yearly" - Any consecutive 12-month period of time.

(4) Basic Requirements.

- (a) The responsible official shall determine the eligibility of the facility for this permit and shall submit a completed Part III of this Dry Cleaner Air General Permit Notification Form at least 30 days prior to beginning operations under this general permit.
- (b) The responsible official shall certify in the initial notification and annually thereafter that the annual consumption of perchloroethylene does not exceed 2,100 gallons per year for dry-to-dry facilities or 1,800 gallons per year for transfer or combination facilities. The annual consumption total shall be based upon purchase receipts and the average shall be recalculated on a monthly basis.
- (c) New facilities shall comply with all applicable requirements upon start-up.
- (d) The operation of transfer cleaning machines purchased after September 22, 1993, is prohibited.
- (e) This permit does not apply to the operation of coin-operated dry cleaning units used solely by customers.

(5) Control Technology Requirements. Control technology requirements are based upon the facility's classification as a small or large area source; the type of machine(s) used, and its date of manufacture or initial purchase from the manufacturer. If the solvent consumption exceeds the source limit for the facility's classification, the facility shall immediately comply with all additional requirements of 40 CFR Part 63, Subpart M, for the appropriate higher classification; unless the consumption meets the definition of an episodic exceedance. Additionally, facilities previously classified as large area sources must apply for a major source permit under Chapter 62-213, F.A.C., within 180 days of exceeding the solvent consumption level. The facility shall operate and maintain equipment according to the manufacturer's specifications. The manuals, design specifications, and other instructional materials shall be kept on-site by the responsible official.

- (a) General Control Requirements. All facilities shall:

1. Store perchloroethylene in tightly sealed containers which are impervious and chemically unreactive to the solvent.
 2. Examine the containers for leakage as required in paragraph (7) of this Part.
 3. Close and secure machine doors except during loading and unloading.
 4. Drain cartridge filters in their housing or in sealed containers for a minimum of twenty-four hours.
 5. Maintain the solvent-to-carbon ratio and steam pressure for carbon adsorber beds to ensure that stripping occurs according to the manufacturer's specifications.
- (b) Process Vent Controls.
1. All existing dry cleaning systems located in small area source facilities and new transfer dry cleaning systems located in small area source facilities which contain only transfer cleaning systems do not require process vent controls.
 2. For all new dry cleaning systems located in small area source facilities, the owner or operator shall:
 - a. Equip all machines with a refrigerated condenser, except for the transfer dry cleaning systems subject to paragraph (5)(b)1. above.
 - b. Equip dry-to-dry, dryer, and reclaimer machines with a closed-loop vapor venting system, such that the air-perchloroethylene gas-vapor stream contained within the machine shall not be vented or released to the atmosphere while the machine drum is rotating.
 - c. Operate the refrigerated condenser with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is opened from passing through the refrigerated condenser.
 - d. Measure and record the exhaust stream temperature of the outlet on the refrigerated condenser on a weekly basis. The temperature must not exceed 45 degrees Fahrenheit (F) [7.2 degrees Celsius (C)].
 - e. Repair or adjust the equipment within twenty-four hours if the exhaust stream temperature exceeds 45 degrees F. The repair shall be documented as required in paragraph (6) of this Part.
 - f. The temperature sensor used in Section (5)(b)2.d. above shall be designed to measure an exhaust stream temperature of 45 degrees F [7.2 degrees C] to an accuracy of plus or minus 2 degrees F [1.1 degrees C]. The sensor must have a detectable range of at least 32 degrees F to 120 degrees F [0 to 48.9 degrees C].
 - g. Conduct all temperature monitoring following an appropriate cooldown period and after verifying that the coolant has been completely charged.
 3. For all existing dry cleaning systems located in large area source facilities, the owner or operator shall:
 - a. Comply with all the requirements listed for new dry cleaning systems located in small area source facilities, except that machines equipped with carbon adsorbers on or before September 22, 1993 are not required to refit with refrigerated condensers.
 - b. Measure and record the exhaust stream temperature on the outlet side of a refrigerated condenser located on dry-to-dry machines, reclaimers, and dryers on a weekly basis as required in paragraph (5)(b)2.d. of this Part.
 - c. Measure and record the temperature of the washer exhaust at both the inlet and outlet sides of the refrigerated condenser. If the temperature differential is less than 20 degrees F [11.1 degrees C], the equipment shall be repaired or adjusted within twenty-four hours. The repair shall be documented pursuant to paragraph (7) of this Part.

- d. Measure and record the concentration of perchloroethylene in the exhaust from the carbon adsorber at a sampling port on a weekly basis using a colorimetric tube. The measurement shall be obtained at the end of the final dry cleaning cycle prior to desorption while the machine is venting to the carbon adsorber. If the concentration of perchloroethylene exceeds parts per million (ppm), the equipment shall be repaired or adjusted within twenty-four hours. The repair shall be documented as required in paragraph (7) of this Part.
 - e. The location of the sampling port for measuring perchloroethylene concentrations in the exhaust duct shall be at least eight stack or duct diameters downstream from any flow disturbances such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and two stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet, or outlet.
 - f. Transfer systems shall be equipped with individual refrigerated condenser coils for dryers, reclaimers, and washers.
 - g. The airflow shall never be routed to bypass the carbon adsorber.
4. For all new dry cleaning systems located in large area source facilities, the owner or operator shall:
- a. Comply with all the requirements listed for existing dry cleaning systems located in large area source facilities, except that all machines shall be equipped with a refrigerated condenser.

(6) Recordkeeping Requirements.

- (a) The responsible official shall maintain the following records in a log kept on-site, for a minimum of five years:
 - 1. All purchase receipts for determination of perchloroethylene solvent consumption and monthly consumption logs.
 - 2. All leak detection inspection and repair reports.
 - 3. All control equipment monitoring data on perchloroethylene concentrations and exhaust stream temperatures.
- (b) On the first business day of the month, the responsible official shall record the total amount of perchloroethylene purchased in the previous month and calculate the total amount purchased in the preceding twelve months, as a measure of perchloroethylene consumption.

(7) Leak Detection Requirements.

- (a) The responsible official or equipment operator of a large area source facility must conduct a weekly leak detection and repair inspection of the facility; however, small area sources may conduct the inspection on a biweekly basis. The responsible official or equipment operator shall enter the results of the inspection into the inspection and repair log kept on-site.
- (b) The responsible official or equipment operator shall use one of the following methods to detect leaks:
 - 1. Visual examination of condensed solvent on exterior surfaces.
 - 2. Detection of air flow through improperly seated gaskets.
 - 3. Detection of perchloroethylene odors.
- (c) The following items shall be inspected for leaks:
 - 1. Hose and pipe connections, fittings, couplings, and valves.
 - 2. Door gasket seating.
 - 3. Filter gaskets and seating.
 - 4. Pumps.
 - 5. Solvent tanks and containers.
 - 6. Water separators.
 - 7. Muck cookers.

8. Stills.
 9. Exhaust dampers.
 10. Diverter valves.
 11. Cartridge filter housings.
- (d) Leaks shall be repaired within twenty-four hours of detection, unless repair equipment must be ordered.
1. Equipment parts needed to repair the machine shall be ordered within two working days of leak detection.
 2. Repair parts shall be installed within five working days of receipt.
- (e) Colorimetric tubes and bellows or piston-driven pumps shall be operated according to the manufacturer's specifications and shall be verified for accuracy by the use of duplicate samples. The tube should be designed to measure a concentration of 100 parts per million by volume of perchloroethylene in air to an accuracy of +/- 25 parts per million by volume.
- (f) The integrity of all rubber seals on the pump shall be inspected on a weekly basis for large area sources (biweekly for small area sources) and all equipment shall be kept in a clean and secure area when not in use.

(8) Local Program Requirements. All facilities located within the borders of Duval County shall comply with the following additional requirements:

- (a) Pursuant to Jacksonville Environmental Board Rule 2.901, no person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor, and
- (b) Pursuant to Jacksonville Ordinance Code Chapter 376, any facility that causes or contributes to the emission of objectionable odors which results in the Air Quality Division (AQD) receiving and validating complaints from five or more different households within a 90-day period may be cited for objectionable odors.

Instructions for Completing Part III of Notification Form

The Perchloroethylene Dry Cleaning Facility Notification of Intent to Use General Permit, Part III of this form, shall be completed and submitted to the Division of Air Resources Management **at least 30 days prior to beginning operations under the general permit.** Please type or print clearly all information. A copy of this notification form shall be kept on-site and made available for review by Department personnel.

The responsible official of the facility, as defined in Part II of this notification form, is responsible for ensuring that the facility complies with all applicable terms and conditions of this general permit, as set forth in Part II of this form.

Mail the signed and completed Part III of this form to:

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS 5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Facility Name and Location

1. **Facility Owner/Company Name** - Enter the name of the corporation, agency, or individual that has ownership or control of the dry cleaning facility for which this notification is submitted.
2. **Site Name** - Enter the common name, if any, of the facility site; for example, Plant A, Metropolis plant, etc. If more than one facility is owned, a notification form must be completed for each.
3. **Hazardous Waste Generator Identification Number** - Enter the hazardous waste generator identification number, if known, assigned by the Department to the facility.
4. **Facility Location** - Enter the street address and zip code of the facility and the city and county in which it is located.
5. **Facility Identification Number (DEP Use ONLY)** - Please leave this space blank. DEP will enter the facility identification number assigned to you by ARMS.

Responsible Official

6. **Name and Title of Responsible Official** - Enter the name and title of the designated responsible official for the facility who, by signing this form, is certifying that the facility is eligible for a general permit pursuant to the requirements of Part II of this notification form and Rule 62-213.300, F.A.C.
7. **Responsible Official Mailing Address** - Enter the mailing address for the responsible official if different than the address entered in No. 4 above.
8. **Responsible Official Telephone Number** - Enter the telephone number and facsimile number, if available, at which the responsible official can be contacted.

Facility Contact

9. **Name and Title of Facility Contact** - Enter the name of the facility contact, if other than the responsible official. For example, a plant manager could be designated as the facility contact for Department inspections.

10. **Facility Contact Address** - Enter the mailing address for the facility contact, if different than the address entered in No. 4 above.
11. **Facility Contact Telephone Number** - Enter the telephone number and facsimile number, if available, at which this person can be contacted.

Facility Information

1. For each machine located at the facility, select the appropriate machine type and type of air pollution control device installed on the machine (for example, dry-to-dry unit w/ ref. condenser). If the dry-to-dry machine was purchased from the manufacturer prior to or on December 9, 1991, it is an **EXISTING** unit. If the dry-to-dry machine was purchased from the manufacturer after December 9, 1991, it is a **NEW** unit. Beginning with dry-to-dry machines, enter the date the machine was **initially purchased from the manufacturer** in the dd-mth-yy format. If you do not know the exact date of purchase, but can confirm it was prior to December 9, 1991, enter 08-DEC-91. Indicate the status of the machine as either new or existing. Circle the required control equipment for that machine (if required) and enter the date of its installation (in the dd-mth-yy format). If control equipment is required, but has not yet been installed, indicate this with an "X". If the control device was already included at the time of purchase, enter "SAME". Up to three dry-to-dry machines may be entered across this table. Complete the other table for transfer machines located at the facility, as applicable. Submit additional copies of these tables if more than three machines per type are located at the facility.
2. Enter the total amount, in gallons, of perchloroethylene consumed during the preceding twelve months. If this amount represents a period of less than twelve months, indicate the actual time period used to determine solvent consumption and the reason for this discrepancy (for example, new store). New owners should attempt to obtain solvent purchase records from the previous owner.
3. Using the amount of perc entered in No. 2 above, select the facility's classification. The classification is based on the definitions found in paragraph (3) of Part II.
4. Indicate which control technology is required on machines pursuant to paragraph (5) of Part II, based upon the selection in No. 3 above. Existing small area sources are not required to install any additional control equipment.
5. Indicate with an "X" that all steam and hot water generating units on-site are exempt from permitting pursuant to Rule 62-210.300(3), F.A.C., or that the facility has no such units on-site. Provide information on the quantities of boilers, their horsepower rating(s), and fuel used.

Equipment Monitoring and Recordkeeping Information

6. Indicate all logs which are required to be kept on-site in accordance with the requirements of this notification form with an "X".

Surrender of Existing DEP Air Permit(s)

7. Rule 62-213.300(2)(a)2., F.A.C., makes the surrender of all existing DEP air permits authorizing the operation of a facility a condition precedent for the entitlement to a DEP air general permit. Indicate whether the responsible official surrenders such permit(s) or whether no such permit(s) exist with an "X" and list all existing DEP air permit numbers.

Responsible Official Certification

This statement must be both printed and signed by the person named on page 13, Field 6, of this form.

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To: DEPT. OF ENVIRONMENTAL PROTECTION GENERAL PERMITS SECTION 2600 BLAIR STONE ROAD MS5510 TALLAHASSEE, FL 32399 UNITED STATES		POSTCOD 32399	TEL:
		Day	27TU
Description:		Weight: Letter Date: 2008-05-23	
DHL standard terms and conditions apply.			
		TLHX 6Z	
(2L)US32399		FSC	
			
WAYBILL: 27444491152		(Non-Negotiable)	



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May 28, 2008

Jane,

Please return the attached check to the following:

THE RITZ-CARLTON
ATTN: Mr. Kunle Modupe, Manager
1111 Ritz-Carlton Drive
Sarasota, FL 34236

...as a *“NO REGISTRATION/NOTIFICATION FEE REQUIRED”*
theme.

Please also include a cc: of the letter to Mr. Karl Behrens, Director of
Engineering at the same address.

Thank you for your assistance.

Dick Dibble

Marriott Business Services (865) 980-4353

VENDOR NO.	VENDOR NAME	CHECK DATE	CHECK NO.	HANDLING		
0000041891	DEPT OF ENVIRONMENTAL PROTECTION	05/21/2008	05227087	OR		
INVOICE NUMBER	DATE	GROSS AMOUNT	DISC AMOUNT	NET AMOUNT	APBU	APBU DESCRIPTION
INA73R41042908 DEP FORM #52 62-213.205(1)(H), F.A.C.		50.00	.00	50.00	73R41	SARASOTA RITZ CARLTO
TOTALS:		50.00	.00	50.00		

NOT
NEGOTIABLE

NOT
NEGOTIABLE

NOT
NEGOTIABLE

THIS CHECK CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES

Marriott
73.RSA.43
Marriott International, Inc
Marriott Business Services
1965 Marriott Drive
Louisville, TN 37777

Accounts Payable Account
Marriott Business Services
(865) 980-4353

Citibank N.A.
One Penn's Way
New Castle, DE 19720

0000041891
FIFTY AND NO/100 DOLLARS *****

CHECK# 05227087

CHECK DATE
05/21/2008

EXACTLY *****50.00
VOID AFTER 6 MONTHS PAST DATE OF ISSUE

PAY TO THE
ORDER OF

DEPT OF ENVIRONMENTAL PROTECTION
2600 BLAIRSTONE RD
TALLAHASSEE FL 32399-2405

Marriott International, Inc.
and affiliated companies

Cardy B. Handlon
Authorized Representative

Security Features Included (E) Details on back



Debbie Telemeco Anders

Environmental Specialist II
Air Quality/Storage Tank Management
dtelemec@scgov.net

Phone 941.861.6289
Cell 941.915.8132
Fax 941.861.6267

2817 Cattlemen Road | Sarasota, FL 34232 | www.scgov.net

Received
letter
4-29-08

Y

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Karl Behrens, Director of Engineering
The Ritz-Carlton
1111 Ritz-Carlton Drive
Sarasota, Florida 34236

Subject: AIR PERMIT REQUIRED: Failure to Operate with a Valid Stationary Source of Air Pollution Permit; The Ritz-Carlton, 1111 Ritz-Carlton Drive, Sarasota, Florida 34236

Dear Mr. Behrens:

Sarasota County Air Quality/Storage Tank Management administers a local air pollution control program through County Ordinance and a Specific Operating Agreement with the Florida Department of Environmental Protection (FDEP). Activities in this program include but are not limited to permitting, facility inspections, records review, and appropriate enforcement actions necessary to ensure compliance with County ordinances and State rules.

The purpose of this letter is to advise you of possible violations of law for which you may be responsible. Florida Department of Environmental Protection rules and regulations prohibit any stationary installation which may reasonably be expected to be a source of pollution from operating without the appropriate and valid permit (FDEP Rule 62-4.030, Florida Administrative Code [F.A.C.]). FDEP Rule 62-210.300, F.A.C., requires the owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant to obtain an appropriate permit from the Department *prior to* beginning construction, modification, or initial or continued operation of the emissions unit.

An April 22, 2008 Air Quality/Storage Tank Management inspection found The Ritz-Carlton Sarasota to be operating without an appropriate and valid permit. Operation of a facility without appropriate and valid permits is a violation of Department of Environmental Protection rules and regulations and Sarasota County Code, Chapter 54, Article V, Air and Noise Pollution. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$10,000 per violation per day pursuant to Sections 403.141 and 403.161, F.S.

52 62-213-205(1)(H) F.A.C.

The April 22, 2008 inspection report indicates that Facility may be entitled to operate under the Perchloroethylene Dry Cleaner Air General Permit (DEP Form No. ~~62-213-900(2)~~, F.A.C.). Within 30 days of receipt of this letter, you are requested to complete and submit the attached Notification of Intent to Use General Permit along with the ~~\$100.00~~ general permit fee for general permit *NOT* requiring Professional Engineer or Professional Geologist certification (Rule 62-4.050(4)(p) 2., F.A.C.) to:

Nb
\$50.00

per Susan
(941) 861-6237

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Sarasota County

Debbie Telemeco Anders

Environmental Specialist II
Air Quality/Storage Tank Management
dtelemec@scgov.net

Phone 941.861.6289
Cell 941.915.8132
Fax 941.861.6267

2817 Cattlemen Road | Sarasota, FL 34232 | www.scgov.net

Received
letter
4-29-08

Y

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Karl Behrens, Director of Engineering
The Ritz-Carlton
1111 Ritz-Carlton Drive
Sarasota, Florida 34236

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Nb
\$50.00

per Susan
(941) 861-6237

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

May 30, 2008

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Mr. Kunle Modupe, Manager
The Ritz-Carlton, Sarasota
1111 Ritz-Carlton Drive
Sarasota, Florida 34236

Re: Sarasota County Environmental Services' April 25 letter: Subject: Air Permit Required

Dear Mr. Modupe:

As directed in the referenced letter to Ritz-Carlton's Mr. Karl Behrens, Director of Engineering, from an agent of the Sarasota County Environmental Services Department, the Bureau of Air Monitoring and Mobile Sources recently received your initial Title V Perchloroethylene Dry Cleaner Air General Permit Notification Form and a general permit registration fee (Marriot International, Inc., check #05227087, dated May 21) in the amount of \$50.00.

In accordance with our conversation of Wednesday, May 28, there is **no Title V Air General Permit registration fee** requirement with the notification form pursuant to the Perchloroethylene Dry Cleaning Facilities, Rule 62-213.300(1)(a), Florida Administrative Code (F.A.C.), or Rule 62-213.205, F.A.C., Annual Emissions Fee.

I apologize for any inconvenience this may have caused, but since there is no registration fee due, we are returning your check

If I can be of further assistance, or you have any questions or concerns in the future, please call me (Tuesday through Friday, 7:00 am to 5:30 pm at 850/921-9586) or by e-mail at: Dickson.Dibble@dep.state.fl.us.

Sincerely,

Dickson E. Dibble
Air General Permit Program
Bureau of Air Monitoring
and Mobile Sources

DD/jw

Enclosure

cc: Mr. Karl Behrens, Director of Engineering

More Protection. Less Process.

Marriott Business Services (865) 980-4353

VENDOR NO.	VENDOR NAME		CHECK DATE	CHECK NO.	HANDLING
0000041891	DEPT OF ENVIRONMENTAL PROTECTION		05/21/2008	05227087	OR
INVOICE NUMBER	DATE	GROSS AMOUNT / DISC AMOUNT	NET AMOUNT	APBU	APBU DESCRIPTION
INA73R41042908 DEP FORM #52 62-213.205(1)(H), F.A.C.		50.00 .00	50.00	73R41	SARASOTA RITZ CARLTO
TOTALS:		50.00 .00	50.00		

NOT NEGOTIABLE

NOT NEGOTIABLE

NOT NEGOTIABLE

THIS CHECK CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES



73.RSA.43
Marriott International, Inc
Marriott Business Services
1965 Marriott Drive
Louisville, TN 37777

Accounts Payable Account
Marriott Business Services
(865) 980-4353

Citibank N.A.
One Penn's Way
New Castle, DE 19720

0000041891

FIFTY AND NO/100 DOLLARS *****

CHECK# 05227087

CHECK DATE
05/21/2008

EXACTLY *****50.00
VOID AFTER 6 MONTHS PAST DATE OF ISSUE

PAY TO THE
ORDER OF

DEPT OF ENVIRONMENTAL PROTECTION
2600 BLAIRSTONE RD
TALLAHASSEE FL 32399-2405

Marriott International, Inc.
and affiliated companies

Cardy B. Handlon
Authorized Representative

VOID

Authorized Representative

Sarasota County

Debbie Telemeco Anders

Environmental Specialist II
Air Quality/Storage Tank Management
dtelemec@scgov.net

Phone 941.861.6289
Cell 941.915.8132
Fax 941.861.6267

2817 Cattlemen Road | Sarasota, FL 34232 | www.scgov.net

Received
letter
4-29-08

Y

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Karl Behrens, Director of Engineering
The Ritz-Carlton
1111 Ritz-Carlton Drive
Sarasota, Florida 34236

Subject: **AIR PERMIT REQUIRED: Failure to Operate with a Valid Stationary Source of Air Pollution Permit; The Ritz-Carlton, 1111 Ritz-Carlton Drive, Sarasota, Florida 34236**

Dear Mr. Behrens:

Sarasota County Air Quality/Storage Tank Management administers a local air pollution control program through County Ordinance and a Specific Operating Agreement with the Florida Department of Environmental Protection (FDEP). Activities in this program include but are not limited to permitting, facility inspections, records review, and appropriate enforcement actions necessary to ensure compliance with County ordinances and State rules.

The purpose of this letter is to advise you of possible violations of law for which you may be responsible. Florida Department of Environmental Protection rules and regulations prohibit any stationary installation which may reasonably be expected to be a source of pollution from operating without the appropriate and valid permit (FDEP Rule 62-4.030, Florida Administrative Code [F.A.C.]). FDEP Rule 62-210.300, F.A.C., requires the owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant to obtain an appropriate permit from the Department *prior to* beginning construction, modification, or initial or continued operation of the emissions unit.

An April 22, 2008 Air Quality/Storage Tank Management inspection found The Ritz-Carlton Sarasota to be operating without an appropriate and valid permit. Operation of a facility without appropriate and valid permits is a violation of Department of Environmental Protection rules and regulations and Sarasota County Code, Chapter 54, Article V, Air and Noise Pollution. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$10,000 per violation per day pursuant to Sections 403.141 and 403.161, F.S.

52 62-213.205(1)(H) F.A.C.

The April 22, 2008 inspection report indicates that Facility may be entitled to operate under the Perchloroethylene Dry Cleaner Air General Permit (DEP Form No. ~~62-213.900(2)~~, F.A.C.). Within 30 days of receipt of this letter, you are requested to complete and submit the attached Notification of Intent to Use General Permit along with the ~~\$100.00~~ general permit fee for general permit *NOT* requiring Professional Engineer or Professional Geologist certification (Rule 62-4.050(4)(p) 2., F.A.C.) to:

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

ENVIRONMENTAL SERVICES, Natural Resources • 2817 Cattlemen Road, Sarasota, FL 34232
Tel 941-861-6230 • Fax 941-861-6267

Nb
\$50.00
Per Susan
(941) 861-6237



SARASOTA COUNTY

"Dedicated to Quality Service"

April 25, 2008

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Karl Behrens, Director of Engineering
The Ritz-Carlton
1111 Ritz-Carlton Drive
Sarasota, Florida 34236

Subject: AIR PERMIT REQUIRED: Failure to Operate with a Valid Stationary Source of Air Pollution Permit; The Ritz-Carlton, 1111 Ritz-Carlton Drive, Sarasota, Florida 34236

Dear Mr. Behrens:

Sarasota County Air Quality/Storage Tank Management administers a local air pollution control program through County Ordinance and a Specific Operating Agreement with the Florida Department of Environmental Protection (FDEP). Activities in this program include but are not limited to permitting, facility inspections, records review, and appropriate enforcement actions necessary to ensure compliance with County ordinances and State rules.

The purpose of this letter is to advise you of possible violations of law for which you may be responsible. Florida Department of Environmental Protection rules and regulations prohibit any stationary installation which may reasonably be expected to be a source of pollution from operating without the appropriate and valid permit (FDEP Rule 62-4.030, Florida Administrative Code [F.A.C.]). FDEP Rule 62-210.300, F.A.C., requires the owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant to obtain an appropriate permit from the Department *prior to beginning construction, modification, or initial or continued operation of the emissions unit.*

An April 22, 2008 Air Quality/Storage Tank Management inspection found The Ritz-Carlton Sarasota to be operating without an appropriate and valid permit. Operation of a facility without appropriate and valid permits is a violation of Department of Environmental Protection rules and regulations and Sarasota County Code, Chapter 54, Article V, Air and Noise Pollution. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$10,000 per violation per day pursuant to Sections 403.141 and 403.161, F.S.

The April 22, 2008 inspection report indicates that Facility may be entitled to operate under the Perchloroethylene Dry Cleaner Air General Permit (DEP Form No. 62-213.900(2), F.A.C.). Within 30 days of receipt of this letter, you are requested to complete and submit the attached Notification of Intent to Use General Permit along with the \$100.00 general permit fee for general permit *NOT* requiring Professional Engineer or Professional Geologist certification (Rule 62-4.050(4)(p) 2., F.A.C.) to:

General Permits Section
Bureau of Air Monitoring and Mobile Sources, MS5510
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

PLEASE BE ADVISED that this Air Permit Required letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), F.S., and Chapter 54, Article V, Sarasota County Code. The purpose of this letter is to advise you of potential violations that may have occurred for which you may be responsible. We look forward to mutual cooperation in resolving this matter.

Sincerely,



Susan Cameron
Environmental Specialist III
Air Quality/Storage Tank Management

Enclosure

cc: Danielle Henry, Environmental Compliance Manager, Department of Environmental Protection, 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926, *email* Danielle.D.Henry@dep.state.fl.us
Cecily Tart, General Permits Section, Bureau of Air Monitoring and Mobile Sources, Department of Environmental Protection, 2600 Blair Stone Rd., Tallahassee, FL 32399-2400, *email* Cecily.Tart@dep.state.fl.us, (850) 921-9513

S08PC.007

May 28, 2008

Jane,

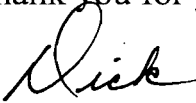
Please return the attached check to the following:

THE RITZ-CARLTON
ATTN: Mr. Kunle Modupe, Manager
1111 Ritz-Carlton Drive
Sarasota, FL 34236

...as a *“NO REGISTRATION/NOTIFICATION FEE REQUIRED”*
theme.

Please also include a cc: of the letter to Mr. Karl Behrens, Director of
Engineering at the same address.

Thank you for your assistance.


Dick Dibble