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AIR GENERAL PERMIT NOTIFICATION FORM

Bureau of Air Monitoring  
& 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):	
LOEWS HOTELS (Existing Facility ID # 0951290)	
2. Site Name (For example, plant name or number):	
LOEWS HOTELS COMMERCIAL LAUNDRY/DRYCLEANER	
3. Hazardous Waste Generator Identification Number:	
CESQG (FLCESQG)	
4. Facility Location:	
Street Address: 6800 LAKEWOOD PLAZA DRIVE	Zip Code: 32819 - 5580
City: ORLANDO County: ORANGE	
5. Facility Identification Number (DEP Use ONLY - do not fill in):	
0951290-007	

Responsible Official

6. Name and Title of Responsible Official:	
Name: TOM RODITUS	Title: DIRECTOR OF OPERATIONS
7. Responsible Official Mailing Address:	
Organization/Firm: LOEWS HOTELS	
Street Address: 6800 LAKEWOOD PLAZA DRIVE	Zip Code: 32819
City: ORLANDO County: ORANGE	
8. Responsible Official Telephone Number:	
Telephone: (407) 503 - 9005	Fax: (407) 503 - 9100

Facility Contact (If different from Responsible Official)

9. Name and Title of Facility Contact (For example, plant manager):	
TONY RODRIGUES, DIRECTOR OF ENGINEERING	
10. Facility Contact Address:	
Street Address: 6800 LAKEWOOD PLAZA DRIVE	Zip Code: 32819
City: ORLANDO County: ORANGE	
11. Facility Contact Telephone Number:	
Telephone: (407) 503 - 9150	Fax: (407) 503 - 9153

**Facility Information**

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

How many dry-to-dry machines do you have on-site? [TWO (2)]

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>XX**/JUNE/1999</u>	Existing/New	RC/CA/None required	<u>SAME</u>
<u>XX**/JUNE/1999</u>	Existing/New	RC/CA/None required	<u>SAME</u>
_____	Existing/New	RC/CA/None required	_____

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

\*\*Exact day in June unknown

**1.(b) TRANSFER MACHINES ONLY**

How many washers do you have on-site? [NONE]

How many dryers/reclaimers do you have on-site? [NONE]

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")
***THIS TABLE IS NOT APPLICABLE TO THIS FACILITY***			
_____	Existing/New	RC/CA/None required	_____
_____	Existing/New	RC/CA/None required	_____
_____	Existing/New	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?

[≈ 155] 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><br>(NONE REQUIRED) <input type="checkbox"/>  | <u>New machines at small area source</u><br>Refrigerated condenser <input type="checkbox"/>            |
| <u>Existing machines at large area source</u><br>Carbon adsorber <input type="checkbox"/><br>Refrigerated condenser <input type="checkbox"/> | <u>New machines at large area source</u><br>Refrigerated condenser <input checked="" 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? [ONE EXISTING AND ONE BACKUP (REDUNDANCY) PROPOSED]

For each boiler, indicate its horsepower (HP) rating: [500 (EXISTING)]

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 0951290-003-AC.
- 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.*

TOM RODITUS

Print name of responsible official

  
Signature

6-23-10  
Date

Attachment A

OCEPD March 25, 2020 letter to Tom Reditus



ENVIRONMENTAL PROTECTION DIVISION  
Lori Cunniff, Manager  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808-7896  
407-836-1400 • Fax 407-836-1499  
www.oecpl.org

March 25, 2010

**CERTIFIED MAIL: 7008 0150 0003 5918 5545**

Mr. Tom Roditus  
Director of Operations  
Loews Hotels  
6800 Lakewood Plaza Drive  
Orlando, FL 32819

**Subject: Air Resources Completeness Review  
Request for Additional Information  
Facility File Number 0951290-005**

Dear Mr. Roditus:

Orange County Environmental Protection Division (EPD) received your application for an air construction permit modification on February 26, 2010. The EPD received the permit fees on that date as well, starting the permit clock for this project. The application requests changes to permit 0951290-003-AC that would remove Title V permitting requirements. On March 16, 2010, your consultant, Mr. Doug Bauman, submitted background information about the application for permit 0951290-003-AC. The EPD has reviewed the current application, our facility files, the background information from Mr. Bauman and the rules relating to the application. Following is a summary of our conclusions and the additional information required.

1. Your facility applied for a Title V general permit for the dry cleaning machines in 2006, and appears to claim that the boilers were an insignificant source. The Division of Air Resource Management of the Florida Department of Environmental Protection (FDEP) ruled on May 10, 2006 that the boilers were not insignificant as defined by Rule 62-213.300(2)(a), Florida Administrative Code (F.A.C.). Rule 62-213.300(2)(a), F.A.C., applies to Title V general permit facilities. A general permit allows only one regulated emission unit, and your facility had two (dry cleaning machines and boilers), so your facility was not eligible for a general permit. Therefore, the FDEP Central District, as the permitting authority at that time, issued construction permit 0951290-003-AC for a Title V major source facility as required by the dry cleaning machines and the boilers.
2. Recently FDEP has changed the permit requirements for dry cleaners from Title V to non-Title V facilities. Because dry cleaners are no longer Title V facilities, the two boilers may be considered exempt from air permitting if they meet the exemption criteria in Rule 62-210.300(3)(a), F.A.C. In your case for example, the two 500 HP boilers could be considered exempt if they meet the requirements

March 25, 2010  
Mr. Tom Reditus, Director of Operations  
Loews Hotels  
Page 2

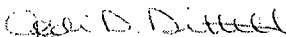
of Rule 62-210.300(3)(a)34, F.A.C., for fossil fuel steam and hot water generators.

3. The EPD recommends that you and your professional engineer review your situation to determine whether to claim that the two 500 HP boilers are exempt. The EPD does not grant exemptions from air permitting. If you claim the boilers are exempt, please have your professional engineer send EPD a letter stating that and providing the rationale. If EPD agrees with your rationale, EPD will accept your claim and consider the boilers exempt from air permitting. If your facility uses this exemption, it will be required to maintain records verifying that it meets rule requirements.
4. If EPD considers the two 500 HP boilers exempt from air permitting, the facility may register for a general permit for its dry cleaning machines as the facility's single regulated emission unit. In that case, the EPD recommends that you withdraw the current application for a construction permit modification and submit a general permit registration form and fee to FDEP for the dry cleaning machines, and copy EPD. Note that permit withdrawals forfeit application fees, general permits become effective 30 days after the registration submittal date and general permit registrations are now processed by FDEP in Tallahassee. You may use the current general permit registration form for dry cleaning machines even though it still indicates that dry cleaners are Title V facilities.
5. If you choose not to claim that the boilers are exempt, please notify EPD and we will process the application as submitted for a construction permit modification.


Pursuant to Rule 62-4.055, F.A.C, the applicant shall have 90 days after EPD mails a timely request for additional information to submit that information to EPD. If an applicant requires more than 90 days in which to respond to a request for additional information, the applicant may notify EPD in writing of the circumstances, at which time the application shall be held in active status for one additional period of up to 90 days. Additional extensions shall be granted for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested additional information shall constitute good cause. Failure of an applicant to provide the timely requested information by the applicable deadline shall result in denial of the application.

If you have any questions, please contact the project engineer, John Kasper, at 407-836-1400, the letterhead address, or by email at [john.kasper@ocfl.net](mailto:john.kasper@ocfl.net).

Sincerely,



Jodi D. Dittell  
Environmental Program Supervisor

  
(6)JK/JD/DJ:bh

Cc: Mr. David Jones, Environmental Program Administrator, EPD  
Mr. Tony Rodrigues, Loews Hotels  
Mr. Doug Bauman, P.E., General Civil and Environmental Engineering LLC  
Ms. Caroline Shine, Air Program Administrator, FDEP Central District

**Attachment B**

**April 21, 2010 Response Letter to OCEPD**



**General Civil &  
Environmental  
Engineering LLC**

Orange County Environmental Protection Division  
Jodi Dittell, Environmental Program Supervisor  
Leeds Commerce Center  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808-7896

April 21, 2010

**RE: Response to Request for Additional Information  
Loews Hotels - Commercial Laundry/Drycleaner (Facility ID 0951290)  
6800 Lakewood Plaza Drive, Orlando, Orange County, Florida**

Dear Ms. Dittell:

This letter is in response to OCEPD's request for additional information (RAI) letter dated March 25, 2010, addressed to Tom Rodus of Loews Hotels. The items are responded to in the same order as listed in the March 2010 RAI letter.

1. Acknowledged. The Title V Air General Permit was not issued due to the boiler(s); and, construction permit 0951290-003-AC was issued following submittal of a construction permit application.
2. Acknowledged.
3. The existing boiler and proposed boiler are considered exempt emission unit(s) per 62-210.300(3)(a) 34, FAC. Other laundry equipment (Challenge Tumbler Dryer Nos. 1 through 5, and Heubsch Originators 170) are exempt pursuant 62-210.300(3)(b) 1, FAC. Attached are emission estimate calculations and documentation supporting the exempt status. Facility management has been informed that records verifying the boilers and other laundry equipment meet the exemptions shall be maintained by the facility.
4. Should EPD concur with the boiler exemption rationale (accept the boiler exemption determination) then the facility will apply for coverage under the Non-Title V Air General Permit for Dry Cleaners, with the 2 existing dry cleaners and one proposed dry cleaning unit being the only regulated emission unit. OCEPD will be copied on the General Permit registration. Following DEP acceptance of coverage under the Non-Title V Air General Permit for Dry Cleaners the facility will withdraw the construction permit modification application currently into OCEPD. Facility management understands the application fee associated with the construction permit modification application (\$250.00) will be forfeited if the application is withdrawn.
5. See response item # 3, above.

I trust that this information is sufficient in response to OCEPD's RAI. Please let us know of your concurrence status with the stated exemptions so that we may proceed with obtaining coverage under the General Permit. If you have any questions, please call me at 407.822.7655.

Respectfully,  
General Civil & Environmental Engineering LLC

  
Douglas Bauman, MSc, P.E.  
Florida Lic. # 50807

Attachments: Exemptions Checklists, CY2009 Actual Emission Estimates, Cleaver-Brooks Boiler Emission Data, Laundry Equipment PTE

cc: Tony Rodrigues, Director of Engineering – Loews Hotels

## Boiler Exemption Checklist

Pursuant to 62-210.300(3)(a) 34, FAC, fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity less than 100 million Btu per hour, provided the following conditions are met with respect to each such unit:

- √ a. The unit is not subject to the Acid Rain Program, CAIR Program, or any unit-specific applicable requirement.
- √\* b. The rated heat input capacity of the unit is less than 100 million Btu per hour and, collectively, the total rated heat input capacity of all units claiming this exemption at the same facility is less than 250 million Btu per hour.
- √ c. The unit shall not burn more than the maximum annual amount of a single fuel, as given in sub-subparagraph e., or equivalent maximum annual amounts of multiple fuels, as addressed in sub-subparagraph f.
- √ d. Collectively, all units claiming this exemption at the same facility shall not burn more than the collective maximum annual amount of a single fuel, as given in sub-subparagraph g., or equivalent collective maximum annual amounts of multiple fuels, as addressed in sub-subparagraph h.
- √\*\* e. If burning only one (1) type of fuel, the annual amount of fuel burned by the unit shall not exceed 150 million standard cubic feet of natural gas, one million gallons of propane, one million gallons of fuel oil with a sulfur content not exceeding 0.05 percent, by weight, 290,000 gallons of fuel oil with a sulfur content not exceeding 0.5 percent, by weight, or 145,000 gallons of fuel oil with a sulfur content not exceeding 1.0 percent, by weight.
- √ f. If burning more than one (1) type of fuel, the equivalent annual amount of each fuel burned by the unit shall not exceed the maximum annual amount of such fuel, as given in sub-subparagraph e., multiplied by a fuel percentage. The fuel percentage is the percentage ratio of the total annual amount of the fuel burned by the unit to the total annual amount of such fuel allowed to be burned by the unit pursuant to sub-subparagraph e. The sum of the fuel percentages for all fuels burned by the unit must be less than or equal to 100 percent.
- √ g. If burning only one (1) type of fuel, the collective annual amount of fuel burned by all units claiming this exemption at the same facility shall not exceed 375 million standard cubic feet of natural gas, 2.5 million gallons of propane, 2.5 million gallons of fuel oil with a sulfur content not exceeding 0.05 percent, by weight, 290,000 gallons of fuel oil with a sulfur content not exceeding 0.5 percent, by weight, or 145,000 gallons of fuel oil with a sulfur content not exceeding 1.0 percent, by weight.
- √ h. If burning more than one (1) type of fuel, the equivalent collective annual amount of each fuel burned by the units claiming this exemption at the same facility shall not exceed the collective maximum annual amount of such fuel, as given in sub-subparagraph g., multiplied by a fuel percentage. The fuel percentage is the percentage ratio of the total annual amount of the fuel burned by all units claiming this exemption at the same facility to the total annual amount of such fuel allowed to be burned by all units claiming this exemption at the same facility pursuant to sub-subparagraph g. The sum of the fuel percentages for all fuels burned by the units claiming this exemption at the same facility must be less than or equal to 100 percent.

### Notes

- √ Indicates requirement has been reviewed by Florida P.E. and is met in favor of exemption.
- \* Boiler's maximum rated heat input capacity is ~ 20.41 MMBtu/hr
- \*\* Estimated actual CY2009 boiler consumption ~ 38.33 million standard cubic feet of natural gas. Boiler will not exceed 150 million standard cubic feet of natural gas annually.

## Generic Emission Unit or Activity Exemption Checklist

Pursuant to 62-210.300(3)(b) 34, FAC, except as otherwise provided at subsection 62-210.300(3), F.A.C., above, an emissions unit or pollutant-emitting activity that is not entitled to a categorical or conditional exemption pursuant to paragraph 62-210.300(3)(a), F.A.C., shall be exempt from any requirement to obtain an air construction permit or non-Title V air operation permit, or to use an air general permit pursuant to Rule 62-210.310, F.A.C., if it meets all of the following criteria:

- √ a. It would be subject to no unit-specific applicable requirement.
- √\* b. It would neither emit nor have the potential to emit:
  - (I) 500 pounds per year or more of lead and lead compounds expressed as lead;
  - (II) 1,000 pounds per year or more of any hazardous air pollutant;
  - (III) 2,500 pounds per year or more of total hazardous air pollutants; or
  - (IV) 5.0 tons per year or more of any other regulated pollutant.
- √ c. Its emissions, in combination with the emissions of other units and activities at the facility, would not cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.
- √ d. In the case of a proposed new emissions unit at an existing facility, the emissions of such unit, in combination with the emissions of any other proposed new or modified units and activities at the facility, would not result in a modification subject to the preconstruction review requirements of subparagraph 62-204.800(1)(d) 2., Rule 62-212.400 or 62-212.500, F.A.C.
- √ e. In the case of a proposed new pollutant-emitting activity, such activity would not constitute a modification of any existing non-exempt emissions unit at a non-Title V source or any existing non-insignificant emissions unit at a Title V source.

### Notes

Exempt Emission Units (EEU) covered by this exemption: EEU01 Challenge Tumbler Dryer No. 1, EEU02 Challenge Tumbler Dryer No. 2, EEU03 Challenge Tumbler Dryer No. 3, EEU04 Challenge Tumbler Dryer No. 4, EEU05 Challenge Tumbler Dryer No. 5, and EEU06 Heusch Originators 170

- √ Indicates requirement has been reviewed by Florida P.E. and is met in favor of exemption.
- \* See attached laundry equipment PTE emission estimates.



**Cleaver-Brooks Boiler Estimated Exhaust/Emission Performance Data**

**Boilers Built After 1996**

**Boiler Summary Data**

Boiler Model:           CBLE-500-150ST  
 Fuel:                    Natural Gas  
 Input, Btu/hr:         20,411,585

Customer:	----
Location:	----
Prepared By:	L.C. Banks
Elevation, feet:	75
Date:	01/26/06

Boiler Type:		Steam
Steam Pressure, psig:		110
LE Option, ppm:		60

		Firing Rate			
		25%	50%	75%	100%
<b>Horsepower</b>		125	250	375	500
<b>Btu/hr</b>		5,102,896	10,205,793	15,308,689	20,411,585
<b>Emission Performance</b>					
<b>CO</b>	ppm	150	50	50	50
	lb/MMBtu	0.11	0.04	0.04	0.04
	lb/hr	0.56	0.37	0.56	0.74
	tpy	2.45	1.63	2.45	3.26
<b>NOx</b>	ppm	60	60	60	60
	lb/MMBtu	0.071	0.071	0.071	0.071
	lb/hr	0.36	0.72	1.08	1.44
	tpy	1.58	3.16	4.73	6.31
<b>SOx</b>	ppm	1	1	1	1
	lb/MMBtu	0.001	0.001	0.001	0.001
	lb/hr	0.005	0.010	0.015	0.020
	tpy	0.02	0.04	0.07	0.09
<b>HC/VOCs</b>	ppm	10	10	10	10
	lb/MMBtu	0.004	0.004	0.004	0.004
	lb/hr	0.020	0.041	0.061	0.082
	tpy	0.09	0.18	0.27	0.36
<b>PM</b>	ppm	N/A	N/A	N/A	N/A
	lb/MMBtu	0.01	0.01	0.01	0.01
	lb/hr	0.038	0.077	0.115	0.153
	tpy	0.17	0.34	0.50	0.67
<b>Exhaust Data</b>					
<b>Temperature, F</b>		371	381	386	396
<b>Flow</b>	ACFM	1,851	3,165	4,775	6,443
	SCFM	1,178	1,989	2,984	3,979
	lb/hr	5,296	8,948	13,422	17,896
<b>Velocity</b>	ft/sec	9.82	16.79	25.33	34.18
	ft/min	589.2	1007.4	1520.1	2050.7

- Notes:**
- 1.) All ppm levels are corrected to 3% oxygen
  - 2.) Fuel input is based on 82% boiler efficiency.

Exempt Laundry Equipment Potential Emissions

Exempt Emission Unit	Exempt Emission Unit Description	Fuel	Maximum Heat Rate (MMBtu/hr)	Emission Factor, (EF)	EF Units	EF Reference	Maximum Hours of Unit Operation	Emission Rate (lbs/hr)	Maximum Annual Emissions (lbs/yr)	Maximum Annual Emissions (tons/yr)
001	Challenge Tumbler Dryer No. 1 (Existing)									
	PM <sub>10</sub>	NG	2.75	0.0000076	lbs/ft <sup>3</sup> gas	1	8000	0.020	159.2	0.1
	SO <sub>2</sub>		2.75	0.0000006		1	8000	0.002	12.6	0.0
	NO <sub>x</sub>		2.75	0.0001		1	8000	0.262	2095.2	1.0
	VOCs		2.75	0.0000055		1	8000	0.014	115.2	0.1
	CO		2.75	0.000084		1	8000	0.220	1760.0	0.9
002	Challenge Tumbler Dryer No. 2 (Existing)									
	PM <sub>10</sub>	NG	2.75	0.0000076	lbs/ft <sup>3</sup> gas	1	8000	0.020	159.2	0.1
	SO <sub>2</sub>		2.75	0.0000006		1	8000	0.002	12.6	0.0
	NO <sub>x</sub>		2.75	0.0001		1	8000	0.262	2095.2	1.0
	VOCs		2.75	0.0000055		1	8000	0.014	115.2	0.1
	CO		2.75	0.000084		1	8000	0.220	1760.0	0.9
003	Challenge Tumbler Dryer No. 3 (Existing)									
	PM <sub>10</sub>	NG	2.75	0.0000076	lbs/ft <sup>3</sup> gas	1	8000	0.020	159.2	0.1
	SO <sub>2</sub>		2.75	0.0000006		1	8000	0.002	12.6	0.0
	NO <sub>x</sub>		2.75	0.0001		1	8000	0.262	2095.2	1.0
	VOCs		2.75	0.0000055		1	8000	0.014	115.2	0.1
	CO		2.75	0.000084		1	8000	0.220	1760.0	0.9
004	Challenge Tumbler Dryer No. 4 (Existing)									
	PM <sub>10</sub>	NG	2.75	0.0000076	lbs/ft <sup>3</sup> gas	1	8000	0.020	159.2	0.1
	SO <sub>2</sub>		2.75	0.0000006		1	8000	0.002	12.6	0.0
	NO <sub>x</sub>		2.75	0.0001		1	8000	0.262	2095.2	1.0
	VOCs		2.75	0.0000055		1	8000	0.014	115.2	0.1
	CO		2.75	0.000084		1	8000	0.220	1760.0	0.9
005	Challenge Tumbler Dryer No. 5 (Existing)									
	PM <sub>10</sub>	NG	2.75	0.0000076	lbs/ft <sup>3</sup> gas	1	8000	0.020	159.2	0.1
	SO <sub>2</sub>		2.75	0.0000006		1	8000	0.002	12.6	0.0
	NO <sub>x</sub>		2.75	0.0001		1	8000	0.262	2095.2	1.0
	VOCs		2.75	0.0000055		1	8000	0.014	115.2	0.1
	CO		2.75	0.000084		1	8000	0.220	1760.0	0.9
006	Heusch Originators 170 (Existing)									
	PM <sub>10</sub>	NG	0.395	0.0000076	lbs/ft <sup>3</sup> gas	1	8000	0.003	22.9	0.0
	SO <sub>2</sub>		0.395	0.0000006		1	8000	0.000	1.8	0.0
	NO <sub>x</sub>		0.395	0.0001		1	8000	0.038	301.0	0.2
	VOCs		0.395	0.0000055		1	8000	0.002	16.6	0.0
	CO		0.395	0.000084		1	8000	0.032	252.8	0.1

Table Notes

EF Reference 1 = AP 42, 5th Ed., Vol. 1, Ch. 1 External Combustion Sources, 1.4 Natural Gas Combustion.  
 Exempt Clever-Brooks Boiler not listed this page.

Attachment C

OCEPD April 27, 2010 Confirmation Letter  
to Tom Roditus



ENVIRONMENTAL PROTECTION DIVISION

Lori Cunniff, Manager  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808-7896  
407-836-1400 • Fax 407-836-1499  
www.ocepd.org

April 27, 2010

Mr. Tom Roditus  
Director of Operations  
Loews Hotels  
6800 Lakewood Plaza Drive  
Orlando, FL 32819

*Review Ordinance*

**Subject: Air Permit Requirements  
Natural Gas-Fired Boilers  
Facility ID 0951290**

Dear Mr. Roditus:

On April 23, 2010 Orange County Environmental Protection Division (EPD) received a letter regarding facility file 0951290-005 and responding to our Request for Additional Information dated March 25, 2010. That letter dated April 21, 2010 from your consultant, Mr. Bauman, stated that the existing and planned 500 HP boilers at your facility are exempt from air permitting requirements by Rule 62-210.300(3)(a)34., Florida Administrative Code (F.A.C.). Mr. Bauman explained the rationale for your conclusion, and provided calculations and information to support your statement.

The EPD accepts your conclusion that both the existing and proposed natural gas-fired 500 HP boilers are exempted from air permitting by the rule cited. However, the boilers are still subject to the recordkeeping requirements of 40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The facility is hereby advised to maintain accurate monthly natural gas consumption records, and facility equipment information, for any future EPD review of your operations. As noted in your letter, the facility's annual natural gas consumption is limited by Rule 62-210.300(3)(a)34., F.A.C.

This letter does not relieve the facility from complying with the requirements of Chapter 403, Florida Statutes, Florida Department of Environmental Protection rules, and any other requirements of federal, state or local law, including the Orange County Air Quality Control Ordinance, Chapter 15 Article III, Orange County Code of Ordinances. If you have any questions or comments, please contact the project engineer, John Kasper, P.E., at the letterhead address or e-mail at [John.Kasper@ocfl.net](mailto:John.Kasper@ocfl.net).

Sincerely,

*Jodi D. Dittell*  
Jodi D. Dittell  
Environmental Program Supervisor  
Air Quality Management  
*JJD*  
(6)JK/JD:bh

Cc: David Jones, P.E., Environmental Program Administrator, Orange County EPD  
Doug Bauman, P.E., General Civil & Environmental Engineering LLC  
Caroline Shine, Air Program Administrator, FDEP Central District



General Civil &  
Environmental  
Engineering LLC

June 7, 2010

Air General Permits Sect.  
Bureau of Air Monitoring and Mobile Sources, MS 5510  
Florida DEP  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

RECEIVED

JUL 06 2010

Bureau of Air Monitoring  
& Mobile Sources

Attention: Dick Dibble

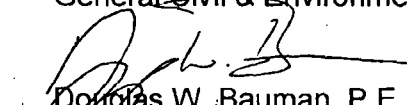
**RE: Perchloroethylene Dry Cleaner Air General Permit Notification  
Loews Hotels - Commercial Laundry/Drycleaner (Facility ID 0951290)  
6800 Lakewood Plaza Drive, Orlando, Orange County, Florida 32819**

Dear Mr. Dibble:

Please find the completed Perchloroethylene Dry Cleaner Air General Permit Notification package for the above referenced facility.

Should you have any question pertaining to the notification, please contact me at (407) 822-7655.

Regards,  
General Civil & Environmental Engineering LLC

  
Douglas W. Bauman, P.E.  
President/Principal Engineer

Enclosures: Perchloroethylene Dry Cleaner Air General Permit Notification Documents

cc: Rodriguez – Loews Hotels  
Tom Reditus – Loews Hotels  
John Kasper – OCEPD

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General Civil &  
Environmental  
Engineering LLC

***Perchloroethylene Dry Cleaner Air General Permit  
Notification (Non-Title V Facility)  
Loews Hotels – Loews Hotels Laundry Valet  
(Facility ID # 0951290)  
6800 Lakewood Plaza Drive  
Orlando, Orange County, Florida 32819***

***Date: June 4, 2010***

***Prepared For:  
Loews Hotels  
6800 Lakewood Plaza Drive  
Orlando, Orange County, Florida 32819  
Phone: (407) 503-9150***

***Prepared By:  
General Civil & Environmental Engineering LLC  
5305 Pineview Way  
Apopka, Florida 32703  
Phone: (407) 822-7655***

## ***Application Contents***

- Part I. Procedures for Use of General Permit, Perchloroethylene Dry Cleaner Air General Permit Notification
- Part II. Permit Terms and Conditions, Perchloroethylene Dry Cleaner Air General Permit Notification
- Part III. Notification of Intent to Use General Permit, Perchloroethylene Dry Cleaner Air General Permit Notification

## **Attachments**

- A OCEPD March 25, 2020 letter to Tom Röditus
- B April 21, 2010 Response Letter to OCEPD
- C OCEPD April 27, 2010 Confirmation Letter to Tom Roditus

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. Dick D, bble.  
 Air General Remit Sect.  
 2600 Blair Stone Rd.  
 Tallahassee, FL. 32399-2400

2. Article Number  
(Transfer from sen)

7009 1410 0000 6437 7407

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

**X**

- 
- Agent
- 
- 
- Addressee

B. Received by ( *Printed Name* )

C. Date of Delivery

 D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- 
- Certified Mail
- 
- Express Mail
- 
- 
- Registered
- 
- Return Receipt for Merchandise
- 
- 
- Insured Mail
- 
- C.O.D.

4. Restricted Delivery? (*Extra Fee*) Yes

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Antonio Rodrigues  
Loews Hotels  
6800 Lakewood Plaza DR.  
Orlando, FL. 32819

Antonio Rodrigues  
Laews Hotels  
6800 Lakewood Plaza DR.  
Orlando, FL. 32819



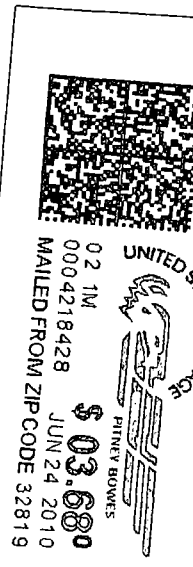
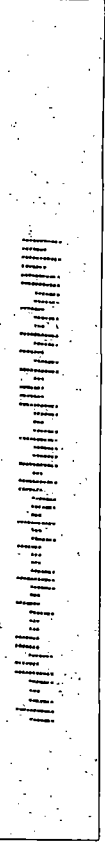
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JUL 02 2010

Bureau of Air Monitoring  
& Mobile Sources

RETURNED TO SENDER  
RETURNED FOR  
ADDITIONAL POSTAGE  
3.15  
WHEN REMAILING, CROSS  
OUT THIS NOTICE OR  
PASTE STAMPS OVER IT.

MR. Dick Dibble.  
Air General Permit Sect.  
2600 Blair Stone Rd.  
Tallahassee, FL. 32399-2400



3.15

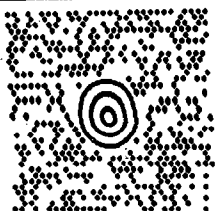
MARY COMPEAU  
407-503-9129  
LOEWS HOTELS AT UNIVERSAL ORLA  
6800 LAKEWOOD PLAZA DRIVE  
ORLANDO FL 32819

0.0 LBS LTR

1 OF 1

**SHIP TO:**

MR DICK DIBBLE  
AIR GENERAL PERMIT SECT  
2600 BLAIR SHORE ROAD  
**TALLAHASSEE FL 32399-2400**



**FL 323 0-01**



**UPS NEXT DAY AIR**

TRACKING #: 1Z 97X V90 01 9770 8249

**1**



BILLING: P/P

Code: LKW Security  
Area: Security

CS 12.0.28. WXP/E60 03.0A 04/2010



LINK  
**ERIC-1066**  
FLORIDA