

RECEIVED

PERCHLOROETHYLENE DRY CLEANER  
AIR GENERAL PERMIT NOTIFICATION FORM

OCT 04 2005

Bureau of Air and Noise  
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): <b>Loews Hotels at Universal Orlando®</b>
2. Site Name (For example, plant name or number): <b>6800 Lakewood Plaza Drive, Orlando, Florida, 32819, Building "B"</b>
3. Hazardous Waste Generator Identification Number: <b>#GAD 9812 69095</b>
4. Facility Location: Street Address: <b>6800 Lakewood Plaza Drive</b> City: <b>Orlando, Florida</b> County: <b>Orange</b> Zip Code: <b>32819</b>
5. Facility Identification Number (DEP Use ONLY - do not fill in): <b>0951290-001</b>

Responsible Official

6. Name and Title of Responsible Official: Name: <b>Tom Roditus</b> Title: <b>Regional Director of Operations</b>
7. Responsible Official Mailing Address: Organization/Firm: <b>Loews Hotels at Universal Orlando®</b> Street Address: <b>6800 Lakewood Plaza Drive</b> City: <b>Orlando, Florida</b> County: <b>Orange</b> Zip Code: <b>32819</b>
8. Responsible Official Telephone Number: Telephone: <b>(407) 503-9100</b> Fax: <b>(407) 503-9005</b>

Facility Contact (If different from Responsible Official)

9. Name and Title of Facility Contact (For example, plant manager): <b>Fred Johansen, Laundry Manager</b>
10. Facility Contact Address: Street Address: <b>6800 Lakewood Plaza Drive</b> City: <b>Orlando, FL</b> County: <b>Orange</b> Zip Code: <b>32819</b>
11. Facility Contact Telephone Number: Telephone: <b>(407) 503-9100</b> Fax: <b>(407) 503-9005 -</b>

**Facility Information**

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

How many dry-to-dry machines do you have on-site? [ 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")
5/99	New	RC	SAME
5/99	New	RC	SAME
	Existing/New	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? [ 0 ]

How many dryers/reclaimers do you have on-site? [ 0 ]

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/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?**

[ 200 ] 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".)

Existing machines at small area source  
(NONE REQUIRED)

New machines at small area source  
Refrigerated condenser

Existing machines at large area source  
Carbon adsorber   
Refrigerated condenser

New machines at large area source  
Refrigerated condenser

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?  1

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

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.

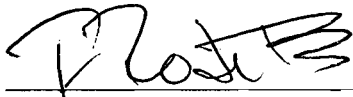
**Responsible Official Certification**

*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.*

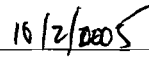
*I will promptly notify the Department of any changes to the information contained in this notification.*

**TOM RODITUS, Regional Director of Operations**

Print name of responsible official



Signature



Date



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

October 19, 2005

Mr. Tom Roditus #0951290-001  
Regional Director of Operations  
Loews Hotels at Universal Orlando  
6800 Lakewood Plaza Drive  
Orlando, Florida 32819

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

## NOTICE OF INELIGIBILITY TO USE TITLE V AIR GENERAL PERMIT

Dear Mr. Roditus:

This is to notify you that the Department, pursuant to your submittal received on October 4, 2005, has determined that your facility does not qualify to use the Title V Air General Permit for Perchloroethylene Dry Cleaner.

The requirements that a facility must meet in order to qualify for use of the Title V Air General Permit are set forth in Rule 62-213.300, Florida Administrative Code (F.A.C.). Your submittal indicates your facility is not eligible for the reason(s) listed below:

- facility information provided is insufficient
- equipment information provided is insufficient
- equipment control information is insufficient
- emissions indicate facility is not eligible
- source category is incorrect
- certification statement is blank or not signed by Responsible Official (Owner)
- other: The facility's 500 horsepower boiler does not meet the definition of an insignificant emission source as defined in Rule 62-213.300(2)(a), F.A.C.

If you have any questions regarding the Department's determination, please contact Bruce Thomas or Sandy Bowman at the Bureau of Air Monitoring and Mobile Sources at 850/488-0114. However, if you believe you meet the requirements for a Title V Air General Permit, you may complete the enclosed blank notification form, making the corrections indicated

"More Protection, Less Process"

above, and resubmit it to the Department. Any facility which does not qualify for a Title V air general permit may require a standard air pollution control permit from the Department. A notice of your legal rights begins on the following page.

The DEP will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes, (F.S.).

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the DEP Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, FL, 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of notice of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C..

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this note.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or wavier requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District

Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida, this 31<sup>st</sup> day of October, 2005.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION



Michael G. Cooke, Director  
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order and all copies were sent by certified mail before the close of business on \_\_\_\_\_ to the person(s) listed:

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

  
(Clerk)

10/31/05  
(Date)



## 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.

**Grant, Patricia**

---

**From:** Thomas, Bruce X.  
**Sent:** Wednesday, October 19, 2005 11:25 AM  
**To:** Wise, Jane  
**Cc:** Bowman, Sandy; Grant, Patricia

Jane,

I would appreciate it if you would prepare a GP denial letter for Mike's signature. The facility information is as follows:

Loews Hotels at Universal Orlando  
6800 Lakewood Plaza Drive  
Orlando, FL 32819

The RO is Tom Roditus, Regional Director of Operations. The AIRS ID# is 0951290-001.

The reason for the denial is: Other x. The facility's 500 horsepower boiler does not meet the definition of an insignificant emission source as defined in Rule 62-213.300(2)(a), F.A.C.

The notification form was received October 4, 2005.

Thank you, Bruce

Bruce Thomas, P.E.  
Division of Air Resource Management  
(850)-921-7744 or Bruce.X.Thomas@dep.state.fl.us



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

October 19, 2005

Mr. Tom Roditus  
Regional Director of Operations  
Loews Hotels at Universal Orlando  
6800 Lakewood Plaza Drive  
Orlando, Florida 32819

#0951290-001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

## NOTICE OF INELIGIBILITY TO USE TITLE V AIR GENERAL PERMIT

Dear Mr. Roditus:

This is to notify you that the Department, pursuant to your submittal received on October 4, 2005, has determined that your facility does not qualify to use the Title V Air General Permit for Perchloroethylene Dry Cleaner.

The requirements that a facility must meet in order to qualify for use of the Title V Air General Permit are set forth in Rule 62-213.300, Florida Administrative Code (F.A.C.). Your submittal indicates your facility is not eligible for the reason(s) listed below:

- facility information provided is insufficient
- equipment information provided is insufficient
- equipment control information is insufficient
- emissions indicate facility is not eligible
- source category is incorrect
- certification statement is blank or not signed by Responsible Official (Owner)
- other: The facility's 500 horsepower boiler does not meet the definition of an insignificant emission source as defined in Rule 62-213.300(2)(a), F.A.C.

If you have any questions regarding the Department's determination, please contact Bruce Thomas or Sandy Bowman at the Bureau of Air Monitoring and Mobile Sources at 850/488-0114. However, if you believe you meet the requirements for a Title V Air General Permit, you may complete the enclosed blank notification form, making the corrections indicated

*"More Protection, Less Process"*

above, and resubmit it to the Department. Any facility which does not qualify for a Title V air general permit may require a standard air pollution control permit from the Department. A notice of your legal rights begins on the following page.

The DEP will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes, (F.S.).

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the DEP Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, FL, 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of notice of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C..

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
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A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this note.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or wavier requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District

Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida, this 31<sup>st</sup> day of October, 2005.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION




Michael G. Cooke, Director  
Division of Air Resource Management

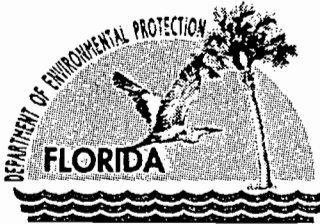
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order and all copies were sent by certified mail before the close of business on \_\_\_\_\_ to the person(s) listed:

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

  
(Clerk)

10/31/05  
(Date)



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

*Bruce T.*

May 10, 2006

Mr. Tom Roditus  
Loews Hotels  
6800 Lakewood Plaza  
Orlando, Florida 32819

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

## NOTICE OF INELIGIBILITY TO USE TITLE V AIR GENERAL PERMIT

Dear Mr. Roditus:

This is to notify you that the Department, pursuant to your submittal received on May 8, 2006, has determined that your facility does not qualify to use the Title V Air General Permit for Perchloroethylene Dry Cleaner.

The requirements that a facility must meet in order to qualify for use of the Title V Air General Permit are set forth in Rule 62-213.300, Florida Administrative Code (F.A.C.). Your submittal indicates your facility is not eligible for the reason(s) listed below:

- facility information provided is insufficient
- equipment information provided is insufficient
- equipment control information is insufficient
- emissions indicate facility is not eligible
- source category is incorrect
- certification statement is blank or not signed by Responsible Official (Owner)
- other: The facility's 500 hp boiler(s) do not meet the definition of an insignificant emission source as defined in Rule 62-213.300(2)(a), F.A.C.

If you have any questions regarding the Department's determination, please contact Bruce Thomas or Sandy Bowman at the Bureau of Air Monitoring and Mobile Sources at 850/488-0114. However, if you believe you meet the requirements for a Title V Air General Permit, you may complete the enclosed blank notification form, making the corrections indicated above, and resubmit it to the Department. Any facility which does not qualify for a Title V air

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general permit may require a standard air pollution control permit from the Department. A notice of your legal rights begins on the following page.

The DEP will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes, (F.S.).

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the DEP Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, FL, 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of notice of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C..

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position

taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this note.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:.

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or wavier requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida, this 10<sup>th</sup> day of May, 2006.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

*Michael G. Cooke*

Michael G. Cooke, Director  
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order and all copies were sent by certified mail before the close of business on \_\_\_\_\_ to the person(s) listed:

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

*Martha Jane Wise*  
\_\_\_\_\_  
(Clerk)

*5-10-06*  
\_\_\_\_\_  
(Date)

SEND

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THIS SECTION ON DELIVERY

- 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 TOM RODITUS  
 REGIONAL DIRECTOR OF OPERATIONS  
 LOEWS HOTELS AT UNIVERSAL ORLANDO  
 6800 LAKEWOOD PLAZA DRIVE  
 ORLANDO FLORIDA 32819

AMS 10<sup>2</sup> 0951290

A. Signature  Agent  
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Prince 11-9-07

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

2. Article Number (Transfer from service label) 7000C600 0026 4128 7010

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USPS  
Permit No. G-10

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

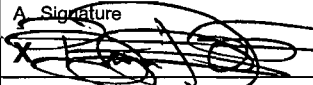
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
TWIN TOWERS OFFICE BLDG  
2600 ELAIR STONE ROAD MS 5510  
TALLAHASSEE FLORIDA 32399-2400

RECEIVED  
NOV 07 2005  
Bureau of Air Monitoring  
& Mobile Sources

ATT: Bruce Thomas

0001



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Signature <span style="float: right;"><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</span> 	
1. Article Addressed to: MR TOM RODITUS #0951290 LOEWS HOTELS 6800 LAKEWOOD PLAZA ORLANDO FL 32819	B. Received by (Printed Name) BRYAN [Signature]	C. Date of Delivery 5-17-06
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
PS Form 3811, February 2004	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
111117004125101000469866231111		
Domestic Return Receipt		102595-02-M-1540



**GENERAL  
ENVIRONMENTAL  
ENGINEERING, INC.**

0951301 - DENIED

Bureau of Air Monitoring  
& Mobile Sources  
MAY 08 2006  
RECEIVED

April 25, 2006

Florida Department of Environmental Protection  
Air Program  
2600 Blair Stone Road, MS 5510  
Tallahassee, Florida 32399-2400

Attention: Sandy Bowman,  
Environmental Manager

**RE: Perchloroethylene Dry Cleaner Air General Permit Notification  
Loews Hotels – Loews Hotels Laundry Valet  
6800 Lakewood Plaza Drive, Orlando, Orange County, Florida 32819**

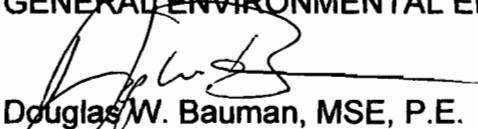
Dear Ms. Sandy Bowman:

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

Based on guidance from the Florida DEP and our own professional engineering review of Florida Administrative Codes 62-210.300(3), 62-213.300(2), 62-213.430(6)(b), 62-210.200(164)(f), and 40CFR60, Subpart Dc, § 60.48c we believe the correct mechanism for permitting of this facility is via the Perchloroethylene Dry Cleaner Air General Permit. We do not believe it is the intent of the relative Florida Administrative Codes to prevent the use of the general permit mechanism based solely on a record keeping and potential notification requirement pursuant to 42 U.S.C. section 7411.

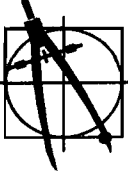
DEP - Central District assisted us and had communications with DEP - Tallahassee pertaining to the determination to proceed with the General Permit Notification. Should you have any question pertaining to the notification, please contact me at (407) 822-7655.

Respectfully submitted,  
GENERAL ENVIRONMENTAL ENGINEERING, INC.

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

Enclosures: Perchloroethylene Dry Cleaner Air General Permit Notification (2)

cc: Tony Rodrigues – Loews Hotels  
Lynn Kozlov – DEP Central District  
John Kasper – OCEPD  
file



**GENERAL  
ENVIRONMENTAL  
ENGINEERING, INC.**

***Perchloroethylene Dry Cleaner Air General Permit  
Notification***

***Loews Hotels – Loews Hotels Laundry Valet  
6800 Lakewood Plaza Drive  
Orlando, Orange County, Florida 32819***

***April 2006***

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

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

***Project No. 173-001-01***



## ***Application Contents***

- Facility & Notification Overview
- 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 (Completed, Signed & Dated)

## **Appendices**

- A Perchloroethylene Purchase and Perchloroethylene Hazardous Waste Spreadsheet
- B Potential-To-Emit Calculations Spreadsheet
- C Emission Factor Documentation

## ***Facility & Notification Overview***

The facility, Loews Hotels Laundry Valet is primarily engaged in the laundering of linen, uniforms, etcetera associated with the Loews Hotels at Universal Studios. The facility has a variety of laundering equipment, much of which is fired using natural gas or uses steam or hot water generated by the facilities Cleaver Brooks brand natural gas fired boiler. The facility has two dry-to-dry machines, which use perchloroethylene and has zero transfer machines for the purpose of dry cleaning.

The dry-to-dry machines use approximately 250 gallons of perchloroethylene per year; this is between 140 to 2,100 gallons; therefore, the facility is classified as a "Large Area Source".

The facility plans on installing several more natural gas fired dryers, an additional hot-water laundry wash machine, and an additional dry-to-dry machine.

The existing boiler currently operates at an output of approximately 30% (of its maximum output) to sustain all the existing laundry equipment at maximum hot water and steam demands. The facility proposes to install a second identical Cleaver Brooks boiler. The purpose of this boiler is to provide redundancy in the laundry operation. In other words, to provide a back-up boiler in the case the primary boiler requires repair or is in need of maintenance. Furthermore, all the laundry equipment, both existing and proposed can easily be sustained by either one, existing or proposed Cleaver Brooks boilers, which are expected to operate alone at approximately 68% output. The intent of the proposed boiler is not to run contiguous with the second boiler; in fact, the Cleaver Brooks boilers tend to be more fuel efficient when operated at higher outputs. The maximum operation of either boiler is limited by the laundry equipment being served. Again, the installation of the proposed boiler will be redundant with respect to the existing boiler.

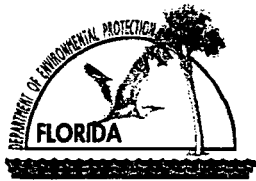
### **Boiler Potential-To-Emit**

Assuming equal distribution of annual operation between the boilers, each boiler is expected to operate less than 3,500 hours per year at approximately 68% output. For the purposes of calculating potential emissions it is assumed that potentially only one of the boilers operates during the year, resulting in approximately 7,000 hours per year of operation and definitely less than 8,000 hours per year based on other laundry limiting factors, including but not limited to: shift changes; laundry equipment hot-water and steam demand; laundry equipment maintenance

requirements; boiler maintenance requirements; etc. This is a very conservative estimate (PTE-scenario boiler operates 7000 hours per year), and is extremely unlikely to take place based on the cost expenditure Loews Hotels will make in adding the redundant boiler. Based on the existing and proposed laundry equipment, the output on the PTE-scenario boiler would again be approximately 68%; however, the PTE calculations conservatively use 80%. The PTE calculations for either boiler operating in this unrealistic manner show the boiler to have less than 5 tons per year of a regulated air pollutant.

**Notice of Intent Comment**

Based on guidance from the Florida DEP and our own professional engineering review of Florida Administrative Codes 62-210.300(3), 62-213.300(2), 62-213.430(6)(b), 62-210.200(164)(f), and 40CFR60, Subpart Dc, § 60.48c we believe the correct mechanism for permitting of this facility is via the Perchloroethylene Dry Cleaner Air General Permit. We do not believe it is the intent of the relative Florida Administrative Codes to prevent the use of the general permit mechanism based solely on a record keeping and potential notification requirement pursuant to 42 U.S.C. section 7411.



# 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

- 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)(l), 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)(l). 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.

NO LETTER REQUIRED  
Permit Denied

PERCHLOROETHYLENE DRY CLEANER  
AIR GENERAL PERMIT NOTIFICATION FORM

FOR USE OF AIR MONITORING  
STATION

MAY 08 2006

RECEIVED

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
2. Site Name (For example, plant name or number): LOEWS HOTELS LAUNDRY VALET
3. Hazardous Waste Generator Identification Number: CESQG (FLCESQG)
4. Facility Location: Street Address: 6800 LAKEWOOD PLAZA DRIVE City: ORLANDO County: ORANGE Zip Code: 32819
5. Facility Identification Number (DEP Use ONLY - do not fill in): 0951301-002

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 City: ORLANDO County: ORANGE Zip Code: 32819
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 City: ORLANDO County: ORANGE Zip Code: 32819
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 EXISTING & ONE PROPOSED]

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>
<u>PROPOSED</u>	Existing/New	RC/CA/None required	<u>SAME</u>

\*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?**

[ ≈ 200 ] 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".)

Existing machines at small area source  
(NONE REQUIRED)

New machines at small area source  
Refrigerated condenser

Existing machines at large area source  
Carbon adsorber   
Refrigerated condenser

New machines at large area source  
Refrigerated condenser

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)] [500 (PROPOSED)]

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.*

TOM RODITUS

Print name of responsible official



Signature

5-1-06

Date

Appendix A  
Perchloroethylene Purchase  
&  
Perchloroethylene Hazardous Waste Spreadsheet

### Perchloroethylene Purchases

Date	Quantity (gal)
9/21/2005	115.8
2/17/2005	115.8
5/12/2004	96.5
Total =	328.1

### Hazardous Waste Shippments

Date	Mnfst. No.	Waste Description	No. of Containers	Container Type	Quantity (lbs)
12/29/2005	11482	16 standard filters, waste tetrachloroethylene	4	DF	320
	11482	15 gal waste tetrachloroethylene	1	DM	150
11/23/2005	11083	30 gal waste tetrachloroethylene	2	DM	300
	11083	one 20 gal drum of tetrachloroethylene lint/debris waste	1	DM	40
10/25/2005	88774	30 gal waste tetrachloroethylene	2	DM	300
4/27/2005	86412	16 standard filters, waste tetrachloroethylene	4	DF	320
	86412	60 gal waste tetrachloroethylene	4	DM	600
	86412	one 20 gal drum of tetrachloroethylene lint/debris waste	1	DM	80

Approximately 135 gallons of Waste Perchloroethylene Shipped Off as HW

Appendix B

Potential-To-Emit Calculations Spreadsheet

Insignificant Emission Source	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)	Is the Unit Pollutant Insignificant (< 5 tons/yr)		
001	Boiler No. 1 (Existing)	NG	PM <sub>10</sub>	20.41	0.1224	lb/hr	1	8000	0.122	979.2	0.5	Yes	
			SO <sub>2</sub>	20.41	0.016		1	8000	0.016	128.0	0.1	Yes	
			NOx	20.41	1.152		1	8000	1.152	9216.0	4.6	Yes	
			VOCs	20.41	0.0656		1	8000	0.066	524.8	0.3	Yes	
			CO	20.41	0.592		1	8000	0.592	4736.0	2.4	Yes	
002	Boiler No. 2 (Proposed)	NG	PM <sub>10</sub>	20.41	0.1224	lb/hr	1	8000	0.122	979.2	0.5	Yes	
			SO <sub>2</sub>	20.41	0.016		1	8000	0.016	128.0	0.1	Yes	
			NOx	20.41	1.152		1	8000	1.152	9216.0	4.6	Yes	
			VOCs	20.41	0.0656		1	8000	0.066	524.8	0.3	Yes	
			CO	20.41	0.592		1	8000	0.592	4736.0	2.4	Yes	
003	Challenge Tumbler Dryer No. 1 (Existing)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
004	Challenge Tumbler Dryer No. 2 (Existing)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
005	Challenge Tumbler Dryer No. 3 (Existing)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
006	Challenge Tumbler Dryer No. 4 (Existing)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
007	Challenge Tumbler Dryer No. 5 (Existing)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
008	Challenge Tumbler Dryer No. 6 (Proposed)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
009	Challenge Tumbler Dryer No. 7 (Proposed)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
010	Challenge Tumbler Dryer No. 8 (Proposed)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
011	Challenge Tumbler Dryer No. 9 (Proposed)	NG	PM <sub>10</sub>	2.75	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.020	159.2	0.1	Yes	
			SO <sub>2</sub>	2.75	0.0000006		2	8000	0.002	12.6	0.0	Yes	
			NOx	2.75	0.0001		2	8000	0.262	2095.2	1.0	Yes	
			VOCs	2.75	0.0000055		2	8000	0.014	115.2	0.1	Yes	
			CO	2.75	0.000084		2	8000	0.220	1760.0	0.9	Yes	
012	Heusch Originators 170	NG	PM <sub>10</sub>	0.395	0.0000076	lbs/ft <sup>3</sup> gas	2	8000	0.003	22.9	0.0	Yes	
			SO <sub>2</sub>	0.395	0.0000006		2	8000	0.000	1.8	0.0	Yes	
			NOx	0.395	0.0001		2	8000	0.038	301.0	0.2	Yes	
			VOCs	0.395	0.0000055		2	8000	0.002	16.6	0.0	Yes	
			CO	0.395	0.000084		2	8000	0.032	252.8	0.1	Yes	
<b>Totals</b>								PM <sub>10</sub>	1.7	Max. Annual Emissions (tons/yr)	1.7	Sum of Units Insignificant (< 100 ton/yr)	Yes
								SO <sub>2</sub>	0.2		0.2	Yes	
								NOx	18.8		18.8	Yes	
								VOCs	1.1		1.1	Yes	
								CO	12.8		12.8	Yes	

Table Notes  
EF Reference 1 = Cleaver-Brooks Boiler Estimated Exhaust/Emission Performance Data, see Appendix C  
EF Reference 2 = AP 42, 5th Ed., Vol. 1, Ch. 1 External Combustion Sources, 1.4 Natural Gas Combustion  
EF Reference 3 = Derived from actual facility data related to perchloroethylene purchases and perchloroethylene hazardous waste generation

**HAP Emissions**

Emission Unit ID	Emission Unit Description	Fuel	Maximum Heat Rate (MMBtu/hr)	Emission Factor (EF)	EF Units		Maximum Annual Perchloroethylene Usage* (gallons)	Emission Rate (lbs/hr)	Maximum Annual Emissions (lbs/yr)
001	Dry-to-Dry Machine No. 1 (Existing) perchloroethylene	N/A	N/A	0.588414634	lb/lb solvent	3	700	NA	5575.3
002	Dry-to-Dry Machine No. 2 (Existing) perchloroethylene	N/A	N/A	0.588414634	lb/lb solvent	3	700	NA	5575.3
003	Dry-to-Dry Machine No. 2 (Proposed) perchloroethylene	N/A	N/A	0.588414634	lb/lb solvent	3	700	NA	5575.3

\* "Usage" means amount of perc purchased and added to dry-to-dry machine and does not account for waste perc. .ie. perc consumption < perc usage.

**Table Notes**

EF Reference 1 = Cleaver-Brooks Boiler Estimated Exhaust/Emission Performance Data, see Appendix C

EF Reference 2 = AP 42, 5th Ed., Vol. 1, Ch. 1 External Combustion Sources, 1.4 Natural Gas Combustion

EF Reference 3 = Derived from actual facility data related to perchloroethylene purchases and perchloroethylene hazardous waste generation

Appendix C  
Emission Factor Documentation



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

**Boilers Built After 1996**

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

**Boiler Summary Data**

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

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.