FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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PERMITTEE

Walt Disney Parks and Resorts U.S., Inc.
1375 Buena Vista Drive
Lake Buena Vista, Florida 32830

Permit No. 0950111-034-AC/PSD-FL-109B
Minor Air Construction Permit
Walt Disney World Resort Complex
Replacement of Previous Permits

Authorized Representative:
Lee Schmudde, Vice President

PROJECT

This is the final air construction permit, which replaces Permit Nos. AC48-105243 (Gen-1) and AC48-106650 (Gen-2) (together under PSD-FL-109), including all subsequent revisions, to reclassify the diesel generators from the current status of at-will operation as non-emergency reciprocating internal combustion engines (RICE) regulated under 40 CFR 63, Subpart ZZZZ, to the status of emergency RICE as defined in Subpart ZZZZ. Walt Disney World Resort Complex is a Theme Parks and Resorts complex categorized under Standard Industrial Classification (SIC) No. 7996 - Amusements and Recreation Services and secondary SIC No. 4911 for the power plant. The existing facility is located in Orange and Osceola Counties with address of 1375 Buena Vista Drive, Lake Buena Vista, Florida. The UTM coordinates are Zone 17, 449.70 km East and 3138.00 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

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

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

Executed in Tallahassee, Florida.

On Behalf of:

Digitally signed by Jonathan Holtom
Date: 2014.06.11 11:07:25 -04'00'

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

JFK/dr/jh

CERTIFICATE OF SERVICE

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

Lee Schmudde, RO, Walt Disney World Company: lee.schmudde@disney.com
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Clerk Stamp

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

Lynn Scearce 2014.06.11 11:19:08 -04'00'

FACILITY DESCRIPTION

The existing facility is a Theme Parks and Resorts facility, which is located at 1375 Buena Vista Drive, partly in Orange and Osceola Counties. It consists of the following emissions units and activities: a complex of hotels, theme parks and support facilities; and, a utility including onsite electrical power generation and water and wastewater facilities. The various air pollution sources are boilers, a combined cycle combustion turbine with a natural gas-fired heat recovery steam generator, paint spray booths and associated operations, external combustion (thermal) oil heaters and hot water heaters, a dry cleaning facility and reciprocating internal combustion engine (RICE) powered emergency generators and pumps.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility operates units subject to the Clean Air Interstate Rule (CAIR).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PROPOSED PROJECT

The purpose of this project is to reclassify the two diesel engine driven 2.5 MW generators that serve the EPCOT complex from the current status of at-will operation as non-emergency reciprocating internal combustion engines (RICE) regulated under 40 CFR 63, Subpart ZZZZ, to the status of emergency RICE as defined in Subpart ZZZZ. This permit replaces the original permits for these engines (Permit Nos. AC48-105243, AC48-106650 and PSD-FL-109, including all subsequent revisions). Emissions limits were established in the original PSD permit to prevent NO_X emissions from the two engines from exceeding 239 tons per year, based on 1,900 hours per year of operation for each engine. From this point forward, these engine-driven emergency generators will only operate as needed to supply electrical power to the EPCOT theme park in the event grid power is lost due to a malfunction of the electrical distribution grid. The engines will also be made available for emergency demand response to the grid under the limited circumstances and hours as outlined in 40 CFR 63.6640(f)(2)(ii) for periods when the North American Electric Reliability Corporation (NERC) has declared an Energy Emergency Alert Level 2. These engines will not be operated for purposes of non-emergency demand response or peak shaving.

The NO_X emissions limit and compliance testing requirements that currently exist for these engines pursuant to permit No. 0950111-033-AC are hereby replaced by the operational requirements and limitations imposed by 40 CFR 63, Subpart ZZZZ for emergency engines.

This project will affect the following emissions units.

ID No.	Emission Unit Description
079	Epcot DG-1 2.5 MW Diesel Generator
080	Epcot DG-2 2.5 MW Diesel Generator

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

2. Compliance Authority. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Central District at: 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.

3. Appendices. The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); and, Appendix C (Common Conditions).

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

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

6. Modification. The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

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

EU 079 and EU 080

This section of the permit addresses the following emissions units.

EU ID No.	ID Code	Emission Unit Description
079	R036	Epcot DG-1: 2.5 MW Diesel Generator
080	R037	Epcot DG-2: 2.5 MW Diesel Generator

Emissions units 079 and 080 are each 2.5 MW (nominal) electric Stewart & Stevenson (Model S-20-645-E4B) compression ignition 3,600 hp reciprocating internal combustion engine (RICE) driven emergency generator serving EPCOT. Sulfur dioxide (SO_2) emissions are controlled by limiting the sulfur content of the No. 2 fuel oil. Nitrogen oxides (NO_X) emissions are controlled by ignition timing retardation and by limiting the hours of operation. Each engine has a stack height of 17 feet with an exit diameter of 22 inches, exit temperature of 600° F and actual volumetric flow rate of 22,100 acfm. Fuel consumption is 180 to 200 gph at full load. Engine displacement is 10.5 liters/cylinder.

The following table provides pertinent details for these engines:

Engine Identification	Engine Brake HP	Model Year	Displacement liters/cylinder (l/c)	Engine Manufacturer	Model No.
EPCOT DG-1	3,600	1983	10.6	Stewart & Stevenson	S-20-645-E4B
EPCOT DG-2	3,600	1983	10.6	Stewart & Stevenson	S-20-645-E4B

{Permitting Notes: These compression ignition reciprocating internal combustion engines (CI RICE) are regulated under 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) adopted in Rule 62.204.800(11)(b), F.A.C. This permit section addresses "existing" stationary CI RICE emergency generator engines greater than or equal to 500 HP with a displacement of greater than 10 liters per cylinder that are located at a major source of HAPs, that commenced construction before 6/12/2006, and that have not been modified or reconstructed after this date.

Pursuant to Subpart IIII, NSPS for Stationary Compression Ignition RICE, these are "existing" emergency engines that commenced construction (ordered) before 7/11/2005 and that have not been modified or reconstructed after 7/11/2005. Therefore, they are not subject to NSPS 40 CFR 60, Subpart IIII.}

Essential Potential to Emit (PTE) Parameters

1. Authorized Fuel. These Stationary Reciprocating Internal Combustion Engines (RICE) must use diesel fuel that meets the following requirements for non-road diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.
   a. *Sulfur Content*. The sulfur content shall not exceed 15 ppm = 0.0015% by weight (ultra low sulfur).
   b. *Cetane and Aromatic*. The fuel must have a minimum Cetane index of 40 or must have a maximum aromatic content of 35 volume percent.
   [40 CFR 63.6604(b) & 40 CFR 80.510(b)]

2. Restricted Hours of Operation. The following limitations apply individually to each engine:
   a. *Total Annual Hours*. Subject to the provisions contained in paragraphs b. – d., these engines are allowed to operate for a maximum of 1,900 hours per calendar year. [Rule 62-212.400(12), F.A.C.]
   b. *Emergency Situations*. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.6640(f)(1)]
   c. *Other Situations*. You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs c.(1) through (3) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph d. counts as part of the 100 hours per calendar year allowed by this paragraph.
      (1) Maintenance and Testing. Each engine is authorized to operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company associated with the engine.

Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. [40 CFR 63.6640(f)(2)(i)]

(2) Emergency Demand Response. Each engine may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 CFR 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [40 CFR 63.6640(f)(2)(ii)]

(3) Voltage or Frequency Deviations. Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. [40 CFR 63.6640(f)(2)(iii)]

d. *Non-emergency Situations*. These engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph b., above. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 63.6640(f)(3)]

3. Work or Management Practice Standards.

a. *Maintenance Plan*. You must operate and maintain these engines and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)]

b. *Engine Startup*. During periods of startup the owner or operator must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)]

Monitoring of Operations

4. Hour Meter. The owner or operator must operate and maintain a non-resettable hour. [Rule 62-4.070(3), F.A.C.]

Compliance

5. Continuous Compliance. Each unit shall be in compliance with the emission limitations and operating standards in this section at all times. [40 CFR 63.6605(a)]

6. Operation and Maintenance of Equipment. At all times the owner or operator must operate and maintain, any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the compliance authority which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

Reporting Requirements

7. Annual Report. Because these engines are contractually obligated to be available for more than 15 hours per calendar year for the purposes described in Specific Condition **2.**c.(2) and (3), above, the permittee shall submit an annual report to the Central District Compliance Office, as specified below.

a. *Contents.* The report must contain the following information:
   (1) Company name and address where the engine is located.
   (2) Date of the report and beginning and ending dates of the reporting period.
   (3) Engine site rating and model year.
   (4) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
   (5) Hours operated for the purposes specified in Specific Condition **2.**c.(2) and (3), including the date, start time, and end time for engine operation for those purposes.
   (6) Number of hours the engine is contractually obligated to be available for the purposes specified in Specific Condition **2.**c.(2) and (3).
   (7) If there were no deviations from the fuel requirements in Specific Condition **1.**, a statement that there were no deviations from the fuel requirements during the reporting period.
   (8) If there were deviations from the fuel requirements in Specific Condition **1.**, information on the number, duration, and cause of deviations, and the corrective action taken.

b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

c. The annual report must also be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13. Link to 40 CFR 63.13

[40 CFR 63.6650(a) & (h), and Table 7.4.]

Recordkeeping Requirements

8. Performance and Compliance Records. The owner or operator must keep:

a. Records of the maintenance conducted in order to demonstrate that the RICE was operated and maintained according to your own maintenance plan. [40 CFR 63.6655(e)]

b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for emergency demand response operation or for periods of voltage or frequency deviations, the owner or operator must keep records of the notification of the emergency situation, and the time of engine operation for these purposes. [Rule 62-4.070(3), F.A.C. and 40 CFR 63.6655(f)]

9. Record Retention.

a. The owner or operator must keep records in a suitable and readily available form for expeditious reviews.

b. The owner or operator must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 CFR 63.6660]