



# Florida Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## NOTICE OF PERMIT

### E-CORRESPONDENCE

[troditus@loewshotels.com](mailto:troditus@loewshotels.com)

Loews Hotels  
6800 Lakewood Plaza Drive  
Orlando, FL 32819

Attention: Tom Roditus, Director of Operations

Orange County - AP  
Boilers and Dry Cleaners  
DEP File Number: 0951290-003-AC

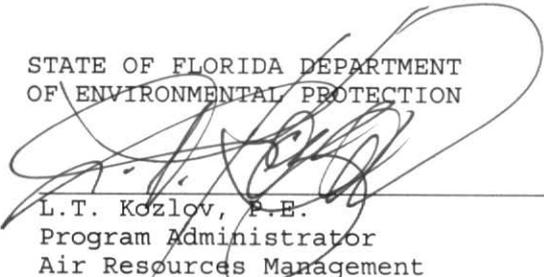
Dear Mr. Roditus:

Enclosed is Permit Number 0951290-003-AC to construct the above referenced facility issued pursuant to Section(s) 403.087, Florida Statutes (F.S.).

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 of the 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 Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

Date: 2-16-07

Filed, on this date, pursuant to Section 120.52,  
F.S., with the designated Department Clerk, receipt of  
which is hereby acknowledged.

Dina Jones Feb. 19, 2007  
Clerk Date

035

LTK/azt

Cc: Hamp Pridgen, OCEPD, ([hamp.Pridgen@OCFL.com](mailto:hamp.Pridgen@OCFL.com))  
Douglas W. Bauman, MSE, P.E. ([doug4ucf@earthlink.net](mailto:doug4ucf@earthlink.net))  
Tony Rodrigues ([tonyrodrigues@loweshotels.com](mailto:tonyrodrigues@loweshotels.com))

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies  
were e-mailed before the close of business on 2/19/07 to  
the listed persons, by Dina Jones .



# Florida Department of Environmental Protection

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Permittee:  
Loews Hotels  
6800 Lakewood Plaza Drive  
Orlando, Florida 32819

Facility Number: 0951290  
**Permit Number: 0951290-003-AC**  
Expiration Date: February 28, 2008  
County: Orange  
Latitude/Longitude:  
28° 27' 25.6"N/81° 28' 30.3"W  
**Project: Boilers and Perc Dry Cleaners**

Attention: Tom Roditus, Director of Operations

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee may construct one 500 hp Clever-Brooks boiler resulting in two 500 hp Clever-Brooks boilers at the facility.

The permittee may construct one Multimatic Shop Star Perchloroethylene Dry-to-Dry machine, resulting in three Multimatic Shop Star Perchloroethylene Dry-to-Dry machines. The Multimatic Shop Star Perchloroethylene Dry-to-Dry machines are subject to 40 CFR 63.320 Subpart M, Dry Cleaning Facilities and subjects the facility to Title V status. The dry cleaner perchloroethylene usage is less than 2100 gallons per year, making its designation a non-major source.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.) The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup and auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - (a) Have access to and copy any records that must be kept under conditions of this permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - (a) A description of and cause of noncompliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

**GENERAL CONDITIONS:**

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and Rule 62-730.300, Florida Administrative Code (F.A.C.), as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
  - ( ) Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
  - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring information) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    1. The date, exact place, and time of sampling or measurements;
    2. The person responsible for performing the sampling or measurements;
    3. The dates analyses were performed;
    4. The person responsible for performing the analyses;
    5. The analytical techniques or methods used;
    6. The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Operating Conditions

1. The **maximum fuel consumption** for each fuel-burning unit at the facility (natural gas fired hot water boilers) is limited to 170.3 million standard cubic feet of natural gas per consecutive twelve months. The **maximum facility perchloroethylene usage** is less than 2100 gallons per consecutive twelve months.
2. All emission units are permitted to operate continuously.

Emission Limitations and Standards

3. The maximum facility volatile organic compound (VOC) and nitrogen oxide (NOx) emission rates are each limited to less than 25.0 tons per consecutive twelve-month period, including fugitive emissions. Additionally, combined hazardous air pollutant (HAP) emissions are limited to less than 25.0 tons per consecutive 12 months, and any single HAP emission is limited to less than 10.0 tons per consecutive 12 months.
4. Visible emissions from the facility are limited to less than 20% opacity [Rule 62-296.320(4)(b)1., F.A.C.].

Compliance

5. Each of the boilers at the facility must be tested for visible emissions in accordance with DEP Method 9 within 180 days after receipt of this permit. The required minimum period of observation for a compliance test shall be sixty (60) minutes for boilers which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for boilers which have potential emissions less than 100 tons per year of particulate matter. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.  
[Rules 62-296.320(4)(b)4.a., 62-296.320(7)(a)3., 62-297.310(4)(a)2., and 62-297.410(9)(a), F.A.C.]
6. The owner or operator shall notify the air compliance section of the Orange County Environmental Protection Division, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.  
[Rule 62-297.310(7)(a)9., F.A.C.]
7. The owner or operator shall submit a copy of the compliance test results to the air compliance section of the Orange County Environmental Protection Division as soon as practical but no later than 45 days after the last sampling run of each test is completed. [Rule 62-297.310(8)(b), F.A.C.]
8. The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C. "Annual Operating Report for Air Pollutant Emitting Facility", including the Emissions Report, for each calendar year and submit to the air compliance section of the Orange County Environmental Protection Division on or before March 1 of the following year. [Rule 62-210.370(3)(a), F.A.C.]

9. In order to demonstrate compliance with condition numbers 1 and 2, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:
- a. Monthly designation of month and year of operation
  - b. For each boiler, monthly and twelve month natural gas usage
  - c. For the dry cleaners, monthly and twelve month perchloroethylene usage
  - d. Consecutive twelve month total of VOC, HAPs, individual HAPS, and NOx emissions
  - e. 40 CFR Part 63.323, Subpart M, test methods and monitoring
  - f. 40 CFR Part 63.324, Subpart M, reporting and record keeping

Note: A consecutive twelve-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive twelve-month total treats each month of the year as the end of a 12-month period. A twelve-month total is not a year-to-date total. Facilities that have not been operating for twelve months should retain twelve-month totals using whatever number of months of data is available until such a time as a consecutive twelve-month total can be maintained each month.

Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least 5 years and made available to the Department. Monthly logs shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C.]

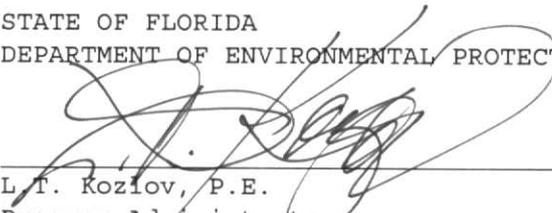
#### **PERMIT APPLICATION**

10. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the department in writing at least 90 days prior to the expiration of the construction permit and submit an application for an extension of the construction permit.

A title V operating permit is required for operation of this source. To obtain an operating permit, the permittee must demonstrate compliance with the conditions of the construction permit and provide the compliance test results and Application for Air Permit to the Department's Central Florida District office. **The application shall be submitted no later than 180 days after receipt of this permit.**

[Rule 62-4.220, F.A.C.]

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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L. T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

Issued: 2-16-07