



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

P.E. Certification Statement

Permittee:

Walt Disney World Company
Walt Disney World Resort Complex

Draft Permit No. **0950111-022-AC**

Project: Air Construction Permit

The facility is a complex of hotels, theme parks and support facilities, and a utility. 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 oil heaters, hot water heaters, and emergency electrical generators.

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

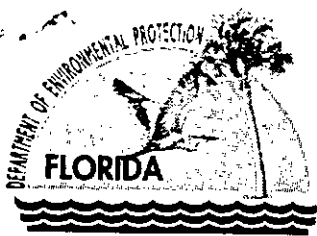
This draft permit was prepared under my direct supervision by Dr. Tom Cascio of my staff.

05/05/04

Alvaro A. Linero, P.E. date
Registration Number: 26032

*July
5/5*

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
Permitting South Section
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0144
Fax: 850/922-6979



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

Colleen M. Castille
Secretary

May 10, 2004

Mr. Lee Schmutde
Responsible Official
Walt Disney World Company
Walt Disney World Resort Complex
P.O. Box 10,000
Lake Buena Vista, FL 32830-1000

Re: Draft Air Construction Permit No. **0950111-022-AC**
Walt Disney World Resort Complex

Dear Mr. Schmutde:

One copy of the Technical Evaluation and Preliminary Determination and the Draft Air Construction Permit for the **Walt Disney World Resort Complex**, located at Buena Vista Drive, Orange and Osceola Counties, is enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" are also included.

Electronic versions of these documents have been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (U.S. EPA) Region 4 office's review. The web site address is:

<http://www.dep.state.fl.us/air/permitting/airpermits>

The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to the Program Administrator, Permitting South Section, at the above letterhead address. If you have any other questions, please contact Tom Cascio, at 850/921-9526.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

Enclosures

U.S. EPA, Region 4 (INTERNET E-mail)

"More Protection. Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Walt Disney World Company
P.O. Box 10,000
Lake Buena Vista, FL 32830-1000

Draft Air Construction Permit No. **0950111-022-AC**
Walt Disney World Resort Complex

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an Air Construction Permit (copy of the Draft Air Construction Permit attached) for the Title V source detailed in the application specified above, and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Walt Disney World Company, applied on March 31, 2004, to the permitting authority for an Air Construction Permit for the Walt Disney World Resort Complex, located at Buena Vista Drive, Orange and Osceola Counties. *The air construction permit is to reclassify three existing diesel electric generators serving the DISC building at the Walt Disney World Complex from insignificant status to regulated status.* Both the annual fuel quantity used and percent sulfur, by weight, in the fuel oil shall be limited.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212, 62-213, and 62-214. This source is not exempt from construction and Title V permitting procedures. The permitting authority has determined that an Air Construction Permit is required to construct and to commence or continue operations at the described facility.

The permitting authority intends to issue the Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that the construction activity and operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT" The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/922-6879, within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

The permitting authority will issue the Air Construction Permit in accordance with the conditions of the attached Draft Construction Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC

NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT” Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting 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) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2242; Fax: 850/245-2303). Petitions filed by the permit’s (construction) applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 of intent. Persons whose substantial interests will be affected by any such final

decision of the permitting authority on the application(s) 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 notice of intent.

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 waiver 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.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE, and the Draft Air Construction Permit) and all copies were sent by certified mail before the close of business on 5/11/04 to the person(s) listed:

Lee Schmudde, Walt Disney World Company

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE, and the Draft Air Construction Permit) were sent by U.S. mail on the same date to the person(s) listed or as otherwise noted:

Rich Bumar, P.E., Walt Disney World Company

Len Kozlov, P.E., Central District Office

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.



(Clerk) 5/11/04
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT

Department of Environmental Protection

Draft Air Construction Permit No. **0950111-022-AC**
Walt Disney World Resort Complex

Orange and Osceola Counties

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an Air Construction Permit to the Walt Disney World Company, for the Walt Disney World Resort Complex, located at Buena Vista Drive, Orange and Osceola Counties. The applicant's name and address are: Mr. Lee Schmulde, Responsible Official, Walt Disney World Company, P.O. Box 10,000, Lake Buena Vista, FL 32830-1000.

The air construction permit is to reclassify three existing diesel electric generators serving the DISC building at the Walt Disney World Complex from insignificant status to regulated status. Both the annual fuel quantity used and percent sulfur, by weight, in the fuel oil shall be limited.

The permitting authority will issue the Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2242; Fax: 850/245-2303). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 applicable 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 of the Florida Administrative Code (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; 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 petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the 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 state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle 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 of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application(s) have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114; Fax: 850/922-6979

Affected District Office:

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555

The complete project file includes the Technical Evaluation and Preliminary Determination, the associated Draft Air Construction Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Program Administrator, Permitting South Section, at the above address, or call 850/488-0114, for additional information.

Draft Air Construction Permit No. 0950111-022-AC

Permittee

Walt Disney World Company Walt Disney World Resort Complex	File No. 0950111-022-AC
P.O. Box 10,000 Lake Buena Vista, FL 32830-1000	Facility ID No. 0950111 SIC No. 7966
<i>Authorized Representative:</i> Lee Schmutde Responsible Official	Permit No. 0950111-022-AC Expires: December 31, 2004

Project and Location

This project is to reclassify three existing diesel electric generators serving the DISC building at the Walt Disney World Complex from insignificant status to regulated status. Both the annual fuel quantity used and percent sulfur, by weight, in the fuel oil shall be limited. The nameplate rating of each generator is 1.75 megawatts (MW). The manufacturer is Spectrum Detroit Diesel. The model number is 1750DS-4. The generators were installed in November, 2002, with initial plans to operate them only as conditionally exempt emergency generators. Diesel fuel for the generators is stored in three 10,000 gallon fuel tanks. This reclassification permitting action should allow increased operational flexibility for the facility.

This facility is located at 1375 Buena Vista Drive, Orange and Osceola Counties; UTM Coordinates: Zone 17, 449.70 km East and 3138.00 km North; Latitude: 28° 22' 24" North and Longitude: 81° 32' 46" West.

This Air 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.). The above named permittee is authorized to construct and operate in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

The attached appendix is made a part of this permit:

Appendix GC Construction Permit General Conditions

Michael G. Cooke, Director
Division of Air Resource Management

Facility Description

This facility consists of the following emissions units:

E.U. ID No. (Facility ID No.)	Brief Description
<u>North Service Area Dry Cleaning Plant</u>	
-001 (LDC-1)	Dry Cleaning Unit #1
<u>North Service Area (NSA)</u>	
-005 (NSA-17)	North Service Area (NSA) Central Shops Building Annex (CSBA): Sand Blast Chamber No. 1: unregulated
-006 (NSA-18)	NSA Boat Maintenance & Painting Facility
-007 (NSA-1 thru 7, 11, 12, 14 thru 16)	NSA Central Shops Building
-014 (NSA-8)	NSA Lofting Building PSB
-015 (NSA-9 & 10)	NSA CSBA
-020 (LBB-1a)	Laundry Boiler #1
-021 (LBB-1b)	Laundry Boiler #2
-022 (LBB-1c)	Laundry Boiler #3
<u>Disney's Grand Floridian Hotel</u>	
-035 (GFR2 thru 18)	16 Hot Water Heaters
<u>Disney-MGM Studios</u>	
-053 (STB-1, 2A, 2B1, 2B2, 3 thru 8)	10 Hot Water Heaters
<u>Disney-MGM Studio Tours</u>	
-061 (MGM-10)	Paint Spray Booth (PSB)
<u>Buena Vista Construction</u>	
-062 (BVC-1)	PSB
<u>Lake Buena Vista Community Village</u>	
-063 (LBV-1 & 2)	PSBs
<u>Disney Village</u>	
-065 (VM-3)	PSB
<u>Ft. Wilderness/Golf Course</u>	
-066 (FWR-4)	PSB
<u>Yacht & Beach Club</u>	
-067 (YBC-3)	PSB
<u>EPCOT Center</u>	
-068 (EP-1 & 2)	PSBs
-070 (EP-3)	PSB
<u>South Service Area</u>	
-071 (SSA-1)	PSB
Administrative Area	
-072 (LAU-1 & 2)	2 Laundry Thermal Oil Heaters
Magic Kingdom	
-075 (MK-1)	PSB

Reedy Creek Improvement District/Epcot	
-076 (Epcot HWG-1 thru 3)	3 Hot Water Heaters (unregulated)
-079 (Epcot DG-1)	2.5 MW Diesel Generator
-080 (Epcot DG-2)	2.5 MW Diesel Generator
Reedy Creek Improvement District	
-081 (CEP-2)	Hot Water Heater
Blizzard Beach	
-083 (BB-1 thru 5)	5 Hot Water Heaters
Reedy Creek Improvement District	
-088 (CEP-1)	CCCT with natural gas fired Heat Recovery Steam Generator
Boardwalk Resort	
-090 (BDW-1 & 2)	2 Boilers
-091 (BDW-3 thru 10)	8 Hot Water Heaters
Magic Kingdom	
-092 (MK-3)	Hot Water Heater
-093 (MK-2)	PSB
Boardwalk Resort	
-094 (BR-1)	PSB
Coronado Springs Resort	
-095 (COS-1 thru 37)	37 Hot Water Heaters
Stand-by/Emergency Generators	
-101	120 Stand-by/Emergency Generators Firing #2 FO, NG or LP Gas
Coronado Springs Resort	
-102 (COS-41)	PSB
Disney's Animal Kingdom	
-103 (DAKU-1 thru 51)	51 Hot Water Heaters
Necropsy Building	
-112 (DAK-1)	Crawford Model CB800 Animal Crematory
All Star Resort	
-113 (ASR-2 thru 108)	107 Hot Water Heaters
-114 (ASR-1)	PSB
Tree of Life Boiler	
-115 (DAKU-52)	1.075 MMBtu/hr boiler firing NG
Disney's MGM Studios Feature Animation Building	
-117	2 PSBs
NSA Monorail Building	
-118 (NSA-20)	Monorail Trains PSB
Disney's Animal Kingdom	
-119	Maintenance PSB

Regulatory Classification and Project Description

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 tons per year (TPY).

The applicant has requested a fuel limitation usage of 254,000 gallons of diesel fuel per year for these generators. Because these generators provide backup power for the DISC Building, a facility that houses extensive computer hardware for the Walt Disney World Resort Complex, the applicant believes that the requested fuel limitation is justified. There will be an increase in the potential levels of emissions of particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO₂), hydrocarbons/VOC, and carbon monoxide (CO) as a result of implementing this project, as noted below. The potential to emit (PTE) calculations in the second column in this table were based on manufacturer provided emissions factor data. In the third column are the corresponding PTE values using EPA's AP-42 factors from Table 3.4-1. in that document.

Pollutant	Potential to emit level (Tons per year) Using manufacturer supplied data	Potential to emit level (Tons per year) Using AP-42 factors
Particulate Matter (PM)	1.6	1.3
Nitrogen Oxides (NO _x)	39.4	54.3
Sulfur Dioxide (SO ₂) (using .5% sulfur fuel, by weight)	4.5	8.9
Hydrocarbons/VOC	10.5	1.6 (TOC)
Carbon Monoxide (CO)	17.5	14.2

The applicant is seeking to escape prevention of significant deterioration (PSD) review for this permitting action. However, this emissions unit (the three diesel fuel fired electric generators), when operated under a fuel limitation of 254,000 gallons of diesel fuel per year, will exceed the significant emission rate for NO_x (40 tons per year) listed in Table 212.400-2, F.A.C., using the AP-42 factors. Alternatively, using a fuel limitation of 185,000 gallons of diesel fuel will hold the potential NO_x emissions increase below the 40 ton per year threshold. Sulfur content of the fuel oil shall also be held to .5%, or less, by weight. With these changes, the three electric generators will now be classified collectively as a *regulated emissions unit*. The fuel limitations are requested by the applicant to escape PSD review, as noted above. We have determined that the new proposed MACT rule does not apply to this emissions unit, since the generators are considered existing units under the rule.

Because the net increases in potential emissions for the pollutants, as noted above in the second column, are below the significant emissions rates listed in Table 212.400-2, F.A.C., Regulated Air Pollutants – Significant Emissions Rates, it has been determined that this change constitutes a minor modification to the facility. Therefore, the modification is not subject to review under Rule 62-212.400,

F.A.C., Prevention of Significant Deterioration (PSD), so neither a revised Best Available Control Technology (BACT) determination nor an analysis of the air quality impact is required. The proposed project is otherwise subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

Project Plan

The applicant shall test the emissions unit to verify the accuracy of the above NOx emissions estimate range using appropriate EPA test methodology, as noted in the next section. Steady state, startup, and shut down operational phases shall be tested for emissions, as detailed in the following test protocol. District and Tallahassee offices shall be notified no less than 7 days prior to conducting the testing. Test results shall be provided to the Department within 30 calendar days after the test conclusion. *The air construction (AC) permit will initially limit the annual diesel fuel oil usage to 185,000 gallons for these three generators.* Based on the results of the tests, a determination will be made by the Department as to the appropriate maximum annual level of fuel usage for these generators, and an air construction permit modification will be issued if a higher (or lower) level of fuel usage is justified.

The emission unit affected by this permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein), and all specific conditions of the facility's existing Title V Air Operation Permit No. 0950111-021-AV.

Test Protocol

The applicant has provided, and the Department has approved, the following test protocol and schedule: An EPA Method 1-4, 7E, and 9 for May 18th and 19th, 2004, at the Walt Disney World Complex DISC Building starting each day at 8 am. The purpose of the test is to confirm the emissions rate for NOx under various load conditions for this current permitting action.

The following test protocol shall be used:

- Day 1: 1 run during startup (about 1 hour or until the engine is at steady-state temperature and pressure, 3 runs at 60% load (about 4 hours total), then 1 shutdown run (about 15 min).
- Day 2: 1 run during startup (about 1 hour or until the engine is at steady-state temperature and pressure, 3 runs at 75% load, 3 runs at 100% load (about 8-hours), and 1 visible emissions test during the 100% load run, then 1 shutdown run (about 15 min).
- The only fuel allowed to be burned in this emissions unit is diesel fuel oil, with a maximum sulfur content of .5%, by weight.

The following data shall be collected during the test: Fuel consumption in gallons per hour, percent load, and power generation in megawatts. Other engine function data shall include revolutions per minute (rpm), engine temperature, and turbo boost in pounds per square inch (psi).

Permit Schedule

- 03/31/04 Application deemed complete
- 03/31/04 Application received

Relevant Documents

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on March 31, 2004.
- The Department's Technical Evaluation and Final Determination issued concurrently with this permit.

Administrative Requirements

A.1. Regulating Agencies. All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation, Florida Department of Environmental Protection, at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and phone number (850) 488-0114. All documents related to reports, tests, and notifications should be submitted to the Department's Central District Office in Orlando, Florida. The address and telephone numbers are:

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555

A.2. General Conditions. The owner and operator is subject to, and shall operate under the attached General Permit Conditions **G.1.** through **G.15.** listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes.
[Rule 62-4.160, F.A.C.]

A.3. Terminology. The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code (F.A.C.).

A.4. Forms and Application Procedures. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C.
[Rule 62-210.900, F.A.C.]

A.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.]

A.6. Permit Extension. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Tallahassee Office no later than 60 days prior to the expiration of the permit.
[Rule 62-4.080, F.A.C.]

A.7. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit 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 Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297.

A.8. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations.
[Rule 62-210.300, F.A.C.]

Operational Requirements

A.9. The facility is subject to all of the requirements specified in Title V Air Operation Permit No. 0950111-021-AV.

A.10. The facility's responsible official shall apply for a Title V Air Operation Permit Revision that incorporates the terms and conditions of this air construction permit no later than 90 days prior to the expiration date of this permit.
[Rule 62-213.420(1)(a)1., F.A.C.]

A.11. Operating Procedures. Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment.
[Rule 62-4.070(3), F.A.C.]

A.12. Methods of Operation. Fuels. The only fuel allowed to be burned in this emissions unit is diesel fuel oil, with a maximum sulfur content of .5%, by weight. The amount of diesel fuel fired in the unit shall not exceed 185,000 gallons per year.
[Rule 62-4.070(3), F.A.C.; and applicant request.]

Testing, Compliance Determination, and Reporting

A.13. A *one time test procedure* shall be performed to determine the potential annual NOx emissions for the emissions unit, as noted in the above narrative. District and Tallahassee offices shall be notified no later than 7 days prior to conducting the testing. Test results shall be provided to the Department within 30 calendar days after the test conclusion. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the compliance authority to determine if the test was properly conducted and if the test results were properly computed. Based on the results of this testing, the annual diesel fuel usage limitation of 185,000 gallons may be adjusted by the Department via an air construction permitting action.
[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

A.14. Sulfur Dioxide. The permittee shall demonstrate compliance with the diesel fuel sulfur limit via a fuel analysis provided by the vendor or permittee upon each fuel delivery to the emission unit's three 10,000 gallon diesel fuel tanks.

- The fuel sulfur content, in percent by weight, for the diesel fuel shall be evaluated using either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95, or the latest editions.

[Rules 62-4.070(3), 62-213.440, and 62-297.440, F.A.C.]

A.15. Recordkeeping. The following records shall be kept at the facility:

- Total gallons of diesel fuel oil used during each month for the three generators.
- The sulfur content, in percent by weight, of all the diesel fuel delivered each month to the three 10,000 gallon tanks, based on the vendor or permittee provided fuel sample analyses. See Specific Condition **A.14**.

The records shall be maintained for a minimum of 5 years and made available to the Central District Office upon request.

[Rule 62-297.310(8), F.A.C.]

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

Walt Disney World Company

Walt Disney World Resort Complex

Facility ID No. **0950111**

DEP File No. **0950111-022-AC**

Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Permitting South Section

May 10, 2004

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1.0. GENERAL INFORMATION

1.1. APPLICANT NAME AND ADDRESS

Walt Disney World Company
P.O. Box 10,000
Lake Buena Vista, FL 32830-1000

Responsible Official: Lee Schmutde

1.2. REVIEW AND PROCESS SCHEDULE

March 31, 2004 Air Construction Permit Application received.
March 31, 2004 Application deemed complete.

2.0. FACILITY INFORMATION

This facility is located at 1375 Buena Vista Drive, Orange and Osceola Counties; UTM Coordinates: Zone 17, 449.70 km East and 3138.00 km North; Latitude: 28° 22' 24" North and Longitude: 81° 32' 46" West.

SIC codes are:

Industry Group No.	79	Amusement and Recreation Services
Industry No.	7996	Amusement Parks

This facility consists of the following emissions units:

E.U. ID No. (Facility ID No.)	Brief Description
<u>North Service Area Dry Cleaning Plant</u>	
-001 (LDC-1)	Dry Cleaning Unit #1
<u>North Service Area (NSA)</u>	
-005 (NSA-17)	North Service Area (NSA) Central Shops Building Annex (CSBA): Sand Blast Chamber No. 1: unregulated
-006 (NSA-18)	NSA Boat Maintenance & Painting Facility
-007 (NSA-1 thru 7, 11, 12, 14 thru 16)	NSA Central Shops Building
-014 (NSA-8)	NSA Lofting Building PSB
-015 (NSA-9 & 10)	NSA CSBA
-020 (LBB-1a)	Laundry Boiler #1
-021 (LBB-1b)	Laundry Boiler #2
-022 (LBB-1c)	Laundry Boiler #3
<u>Disney's Grand Floridian Hotel</u>	
-035 (GFR2 thru 18)	16 Hot Water Heaters

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

<u>Disney-MGM Studios</u>	
-053 (STB-1, 2A, 2B1, 2B2, 3 thru 8)	10 Hot Water Heaters
<u>Disney-MGM Studio Tours</u>	
-061 (MGM-10)	Paint Spray Booth (PSB)
<u>Buena Vista Construction</u>	
-062 (BVC-1)	PSB
<u>Lake Buena Vista Community Village</u>	
-063 (LBV-1 & 2)	PSBs
<u>Disney Village</u>	
-065 (VM-3)	PSB
<u>Ft. Wilderness/Golf Course</u>	
-066 (FWR-4)	PSB
<u>Yacht & Beach Club</u>	
-067 (YBC-3)	PSB
<u>EPCOT Center</u>	
-068 (EP-1 & 2)	PSBs
-070 (EP-3)	PSB
<u>South Service Area</u>	
-071 (SSA-1)	PSB
Administrative Area	
-072 (LAU-1 & 2)	2 Laundry Thermal Oil Heaters
Magic Kingdom	
-075 (MK-1)	PSB
Reedy Creek Improvement District/Epcot	
-076 (Epcot HWG-1 thru 3)	3 Hot Water Heaters (unregulated)
-079 (Epcot DG-1)	2.5 MW Diesel Generator
-080 (Epcot DG-2)	2.5 MW Diesel Generator
Reedy Creek Improvement District	
-081 (CEP-2)	Hot Water Heater
Blizzard Beach	
-083 (BB-1 thru 5)	5 Hot Water Heaters
Reedy Creek Improvement District	
-088 (CEP-1)	CCCT with natural gas fired Heat Recovery Steam Generator
Boardwalk Resort	
-090 (BDW-1 & 2)	2 Boilers
-091 (BDW-3 thru 10)	8 Hot Water Heaters
Magic Kingdom	
-092 (MK-3)	Hot Water Heater
-093 (MK-2)	PSB
Boardwalk Resort	
-094 (BR-1)	PSB

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Coronado Springs Resort	
-095 (COS-1 thru 37)	37 Hot Water Heaters
Stand-by/Emergency Generators	
-101	120 Stand-by/Emergency Generators Firing #2 FO, NG or LP Gas
Coronado Springs Resort	
-102 (COS-41)	PSB
Disney's Animal Kingdom	
-103 (DAKU-1 thru 51)	51 Hot Water Heaters
Necropsy Building	
-112 (DAK-1)	Crawford Model CB800 Animal Crematory
All Star Resort	
-113 (ASR-2 thru 108)	107 Hot Water Heaters
-114 (ASR-1)	PSB
Tree of Life Boiler	
-115 (DAKU-52)	1.075 MMBtu/hr boiler firing NG
Disney's MGM Studios Feature Animation Building	
-117	2 PSBs
NSA Monorail Building	
-118 (NSA-20)	Monorail Trains PSB
Disney's Animal Kingdom	
-119	Maintenance PSB

This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 tons per year (TPY). This facility is also a major source of hazardous air pollutants (HAPs).

The facility is located in an area (Orange and Osceola Counties) designated "unclassifiable" for PM₁₀, "air quality maintenance" for ozone (Orange County only), and "attainment" for all the other criteria pollutants (Rule 62-204.340, F.A.C.).

The facility's existing Title V Air Operation Permit Renewal has an effective date of January 1, 2003, and will expire on December 31, 2007.

3.0. PROJECT DESCRIPTION

This project is to reclassify three existing diesel electric generators serving the DISC building from insignificant status to regulated status. Both the annual fuel quantity used and percent sulfur, by weight, in the fuel oil will be limited. The nameplate rating of each generator is 1.75 megawatts (MW). The manufacturer is Spectrum Detroit Diesel. The model number is 1750DS-4. The generators were installed in November, 2002, with initial plans to operate them only as conditionally exempt emergency generators. This reclassification permitting action should allow increased operational flexibility for the facility.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

4.0. PROJECT EMISSIONS & RULE APPLICABILITY

The applicant has requested a fuel limitation usage of 254,000 gallons of diesel fuel per year for these generators. Because these generators provide backup power for the DISC Building, a facility that houses extensive computer hardware for the Walt Disney World Resort Complex, the applicant believes that the requested fuel limitation is justified. There will be an increase in the potential levels of emissions of particulate matter (PM), nitrogen oxides (NOx), sulfur dioxide (SO2), hydrocarbons/VOC, and carbon monoxide (CO) as a result of implementing this project, as noted below. The potential to emit (PTE) calculations in the second column in this table were based on manufacturer provided emissions factor data. In the third column are the corresponding PTE values using EPA's AP-42 factors from Table 3.4-1. in that document.

Pollutant	Potential to emit level (Tons per year) Using manufacturer supplied data	Potential to emit level (Tons per year) Using AP-42 factors
Particulate Matter (PM)	1.6	1.3
Nitrogen Oxides (NOx)	39.4	54.3
Sulfur Dioxide (SO2) (using .5% sulfur fuel, by weight)	4.5	8.9
Hydrocarbons/VOC	10.5	1.6 (TOC)
Carbon Monoxide (CO)	17.5	14.2

The applicant is seeking to escape prevention of significant deterioration (PSD) review for this permitting action. However, this emissions unit (the three diesel fuel fired electric generators), when operated under a fuel limitation of 254,000 gallons of diesel fuel per year, will exceed the significant emission rate for NOx (40 tons per year) listed in Table 212.400-2, F.A.C., using the AP-42 factors. Alternatively, using a fuel limitation of 185,000 gallons of diesel fuel will hold the potential NOx emissions increase below the 40 ton per year threshold. Sulfur content of the fuel oil shall also be held to .5%, or less, by weight. With these changes, the three electric generators will now be classified collectively as a *regulated emissions unit*. The fuel limitations are requested by the applicant to escape PSD review, as noted above. We have determined that the new proposed MACT rule does not apply to this emissions unit, since the generators are considered existing units under the rule.

Because the net increases in potential emissions for the pollutants, as noted above in the second column, are below the significant emissions rates listed in Table 212.400-2, F.A.C., Regulated Air Pollutants – Significant Emissions Rates, it has been determined that this change constitutes a minor modification to the facility. Therefore, the modification is not subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), so neither a revised Best Available Control Technology (BACT) determination nor an analysis of the air quality impact is required. The proposed project is otherwise subject to preconstruction review requirements under the provisions of Chapter 403.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

The applicant shall test the emissions unit to verify the accuracy of the above NO_x emissions estimate range using appropriate EPA test methodology, as noted in the next section. Steady state, startup, and shut down operational phases shall be tested for emissions, as detailed in the following test protocol. District and Tallahassee offices shall be notified no less than 7 days prior to conducting the testing. Test results shall be provided to the Department within 30 calendar days after the test conclusion. *The air construction (AC) permit will initially limit the annual diesel fuel oil usage to 185,000 gallons for these three generators.* Based on the results of the tests, a determination will be made by the Department as to the appropriate maximum annual level of fuel usage for these generators, and an air construction permit modification will be issued if a higher (or lower) level of fuel usage is justified.

The emission unit affected by this permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein), and all specific conditions of the facility's existing Title V Air Operation Permit No. 0950111-021-AV.

4.1. TEST PROTOCOL

The applicant has provided, and the Department has approved, the following test schedule: An EPA Method 1-4, 7E, and 9 for May 18th and 19th, 2004, at the Walt Disney World Resort Complex DISC Building starting each day at 8 am. The purpose of the test is to confirm the emissions rate for NO_x under various load conditions for this current permitting action.

The following test protocol shall be used:

- Day 1: 1 run during startup (about 1 hour or until the engine is at steady-state temperature and pressure, 3 runs at 60% load (about 4 hours total), then 1 shutdown run (about 15 min).
- Day 2: 1 run during startup (about 1 hour or until the engine is at steady-state temperature and pressure, 3 runs at 75% load, 3 runs at 100% load (about 8-hours), and 1 visible emissions test during the 100% load run, then 1 shutdown run (about 15 min).
- The only fuel allowed to be burned in this emissions unit is diesel fuel oil, with a maximum sulfur content of .5%, by weight.

The following data will be collected during the test: Fuel consumption in gallons per hour, percent load, and power generation in megawatts. Other engine function data shall include revolutions per minute (rpm), engine temperature, and turbo boost in pounds per square inch (psi).

5.0. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department will issue a draft Air Construction Permit to the applicant that provides for the above changes at the facility.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:
 Mr. Lee Schmdude
 Responsible Official
 Walt Disney World Company
 Walt Disney World Resort
 Complex
 Post Office Box 10,000
 Lake Buena Vista, Florida
 32830-1000

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

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

D. Is delivery address different from item 1? Yes
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4. Restricted Delivery? (Extra Fee) Yes

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 Lake Buena Vista, Florida 32830-1000
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