

Memorandum

Florida Department of
Environmental Protection

TO: Memo to File
FROM: Bruce Mitchell *BMM*
DATE: January 14, 1999
SUBJECT: Comments Regarding: Draft Air Construction Permit/DRAFT Title V Operating Permit
0950111-016-AC/0950111-017-AV
Walt Disney World Resort Complex

Based on a review of the above referenced permitting action, which is on Public Notice, I am making the following comment, which is to be addressed in the PROPOSED Determination:

1. Section III. Subsection A. Specific Conditions A.12. and A.14. thru A.19. contain the conjunction "or" between the "lbs/hr" limitation and the "TPY" limitation. The correct conjunction should be "nor". Therefore, "nor" shall replace "or" in these referenced Specific Conditions (see attached pages).

RBM/bm

Attachments

cc: Clair Fancy, DARM/BAR
Scott Sheplak, DARM/BAR/Title V
Pat Comer, Esq., DEP
Jeffery Brown, Esq., DEP
Rich Bumar, WDWC
Bob Kindle, RCECI

*1/19/99 cc - Reading File
Bruce Mitchell*

the month and then using consecutive monthly averages to obtain an annual average. The Department may alter this averaging method after due consideration of alternative compliance plans.

[0950111-005-AV]

A.9. Nitrogen Oxides. Nitrogen oxides emissions, expressed as NO_x, shall not exceed 74 ppm by volume at 15 percent oxygen and on a dry basis (112 lbs/hr) during conditions of peak loading (based on 40°F), or 58 ppm by volume at 15 percent oxygen and on a dry basis (77 lbs/hr) for a 12-month rolling average, or 280 tons per year, while burning natural gas. The 12-month rolling average emissions will be calculated using hourly averages of the combustion turbine and duct burner combined during the month and then using consecutive monthly averages to obtain an annual average. The Department may alter this averaging method after due consideration of alternative compliance plans. The duct burner NO_x emissions shall not exceed 4.6 lbs/hr at 23 MMBtu/hr heat input (corresponding to 0.20 lb/MMBtu) or 40 lbs/hr at 198 MMBtu/hr heat input (corresponding to 0.20 lb/MMBtu). The nitrogen oxides emissions standard apply at all times including periods of startup, shutdown, or malfunction.

[40 CFR 60.44b(a)(4), (h) & (i); and, 0950111-001-AC]

A.10. Nitrogen Oxides. Nitrogen oxides from the CT shall be controlled by water injection at a minimum of 0.6/1.0 water-to-fuel ratio (Reedy Creek Improvement District (RCID) will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize pollution control and meet the permitted emission limits.).

[0950111-005-AV]

A.11. Sulfur Dioxide. Sulfur dioxide emissions shall not exceed 58 ppm by volume at 15 percent oxygen and on a dry basis. The maximum allowed sulfur dioxide emissions shall not exceed 118 lbs/hr or 20 tons per year, while burning new No. 2 distillate fuel oil.

[40 CFR 60.333(a); and, 0950111-005-AV]

A.12. Sulfur Dioxide. The maximum allowed sulfur dioxide emissions shall not exceed 1.2 lbs/hr or 5.1 tons per year, while burning natural gas.

[0950111-005-AV]

A.13. Sulfur Dioxide - Sulfur Content. The sulfur content of the fuel oil fired by the stationary gas turbine may be used to determine compliance with 40 CFR 60.333(a). Under such circumstances, the permittee shall not fire in any stationary gas turbine any fuel which contains a sulfur content in excess of 0.4 percent, by weight.

[40 CFR 60.333(b); and, 0950111-005-AV]

A.14. Particulate Matter. Particulate matter shall not exceed 9 lbs/hr or 2 tons per year, while burning new No. 2 distillate fuel oil.

[0950111-005-AV]

A.15. Particulate Matter. Particulate matter shall not exceed 0.8 lbs/hr or 3.5 tons per year, while burning natural gas.

[0950111-005-AV]

A.16. Carbon Monoxide. Carbon monoxide emissions shall not exceed 24 lbs/hr nor 4 tons per year, while burning new No. 2 distillate fuel oil.
[0950111-005-AV]

A.17. Carbon Monoxide. Carbon monoxide emissions shall not exceed 25 lbs/hr nor 110 tons per year, while burning natural gas.
[0950111-005-AV]

A.18. Volatile Organic Compounds (VOCs). VOC emissions shall not exceed 6 lbs/hr nor 1 ton per year, while burning new No. 2 distillate fuel oil.
[0950111-005-AV]

A.19. Volatile Organic Compounds (VOCs). VOC emissions shall not exceed 6 lbs/hr nor 26 tons per year, while burning natural gas.
[0950111-005-AV]

A.20. Visible Emissions. Visible emissions shall not exceed 10 percent opacity while burning new No. 2 distillate fuel oil.
[0950111-005-AV]

A.21. Visible Emissions. Visible emissions shall not exceed 5 percent opacity while burning natural gas.
[0950111-005-AV]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

A.22. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

A.23. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

A.24. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
[40 CFR 60.11(d)]