

# Department of Environmental Protection

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

Virginia B. Wetherell Secretary

## P.E. Certification Statement

Permittee:

Walt Disney World Company Walt Disney World Resort Complex

Project type: Initial Title V Air Operation Permit

**DRAFT Permit No.:** 0950111-005-AV

Facility ID No.: 0950111

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of complitations with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Cock Chapter 103, Florida Statutes, and Florida Administrative Cock Chapter 103, fand 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposed of my area of expertise (including but not limited to the electrical, mechanical statutes).

Scott M. Sheplak, P. ...

Registration Number: 0048866

Permitting Authority:

Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4 Tallahassee, Florida 32301

Telephone: 850/488-1344

Fax: 850/922-6979



# Department of Environmental Protection

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

Virginia B. Wetherell Secretary

October 13, 1997

Mr. William A. O'Toole Senior Vice President Walt Disney World Company P.O. Box 10,000 Lake Buena Vista, Florida 32830-1000

Re:

DRAFT Title V Permit No.: 0950111-005-AV

Walt Disney World Resort Complex

Dear Mr. O'Toole:

One copy of the DRAFT Title V Air Operation Permit for the Walt Disney World Resort Complex located at 1375 Buena Vista Drive, Orange County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included.

The Department will publish the "<u>PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT</u>" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak at the above letterhead address. If you have any other questions, please contact Bruce Mitchell at 850/488-1344.

Sincerely,

C. H. Fancy,

Chief

Bureau of Air Regulation

CHF/m Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

In the Matter of an Application for Permit by:

Walt Disney World Company P.O. Box 10,000 Lake Buena Vista, Florida 32830-1000 DRAFT Permit No.: 0950111-005-AV Walt Disney world Resort Complex Orange County

## INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Walt Disney World Company, applied on June 12, 1996, to the permitting authority for a Title V air operation permit for the Walt Disney world Resort Complex located at 1375 Buena Vista Drive, Lake Buena Vista, Orange County.

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, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required in order to commence or to continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that 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 403.0872, F.S., and Rules 62-103.150 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 TITLE V AIR OPERATION PERMIT." However, the Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, F.S.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT 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 permit issuance action for a period of 30 (thirty) days from the date of publication of the "<u>PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT</u>." 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 Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

Page 2 of 4

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person 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. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) 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 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
  - (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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 have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

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

Page 3 of 4

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.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must

Page 4 of 4

meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

# STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

#### **CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PRAFT permit) and all copies were sent by certified mail before the close of business on 10 13 9 to the person(s) listed:

Mr. William A. O'Toole, Walt Disney World Company

Mr. Lee Schmudde, Responsible Official, Vice President, Walt Disney World Company

Mr. William K. Smith, Designated Representative, Director, Reedy Creek Energy Services, Inc.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Thomas W. Davis, P.E., Environmental Consulting & Technology, Inc.

Mr. Armando Rodriguez, Walt Disney World Company

Mr. Len Kozlov, FDEP, 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)

(Date)

on the reverse sirae?	SENDER:  2 Complete items 1 and/or 2 for additional services.  Complete items 3, 4a, and 4b.  Print your name and address on the reverse of this form so that we card to you.  Attach this form to the front of the mailpiece, or on the back if space permit.  Write "Return Receipt Requested" on the mailpiece below the article.  The Return Receipt will show to whom the article was delivered and delivered.	I also wish to receive the following services (for an extra fee):  1.  Addressee's Address 2.  Restricted Delivery Consult postmaster for fee.		
s your <u>RETURN ADDRESS</u> completed o	3. Article Addressed to: Mr. William K. Smith Reedy Creek Energy Services, Inc. P.O. Box 10,000 Lake Buena Vista, Florida 32830-1000  5. Received By: (Addressed of 1997)  6. Signature: (Addressed of 1997)  X	7. Date of De	Type and Certified Insured Palivery Cod	you lot using
_	PS Form 3811 December 1994		Domestic Return Receipt	

P 263 585 123

US Postal Service

Receipt for Certified Mail
No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Mr. William K. Smith

Street & Number P.O. Box 10,000

Post Office, State, & ZIP Code Lake Buena Vista, FL 32830-1000

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to Whom, Date, & Addressee's Address

TOTAL Postage & Fees

Postmark or Date
10/13/97 - DRAFT PERMIT

Walt Disney World
1D#0950111 - 005 - AU

on the reverse side?	SENDER:  Complete items 1 and/or 2 for additional services.  Complete items 3, 4a, and 4b.  Print your name and address on the reverse of this form so that we card to you.  Attach this form to the front of the mailpiece, or on the back if space permit.  Write 'Return Receipt Requested' on the mailpiece below the article.  The Return Receipt will show to whom the article was delivered and delivered.	a number.  2. Restricted Delivery
ADDRESS completed o	3. Article Addressed to: Mr. Lee Schmudde Vice President Walt Disney World Company P.O. Box 10,000 Lake Buene Vista Florida	4a Article Number 4b. Service Type  Registered Express Mail Return Receipt for Merchandise
ls your <u>RETURN ADI</u>	5. Received By (Print Name)  6. Signature: (Addressee or Agent)  X FULFILLMENT &	7. Date of Delivery  8. Addressee's Address (Only if requested and fee is paid)
	PS Form 3811. December 1994CES	Domestic Return Receipt

P 263 585 122

**US Postal Service** Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to Mr. Lee Schmudde Street & Number P.O. Box 10,000 Post Office, State, & ZIP Code Lake Buena Vista, FL \$328 Postage Certified Fee Special Delivery Fee Restricted Delivery Fee Return Receipt Showing to Whom & Date Delivered Return Receipt Showing to Whom Date, & Addressee's Address TOTAL Postage & Fees

on the reverse side?	SENDER:  Complete items 1 and/or 2 for additional services.  Complete items 3, 4a, and 4b.  Print your name and address on the reverse of this form so that we card to you.  Attach this form to the front of the mailpiece, or on the back if spac permit.  Write "Return Receipt Requested" on the mailpiece below the article  The Return Receipt will show to whom the article was delivered an delivered.	e does not e number.	I also wish to receive following services extra fee):  1.  Addresse 2.  Restricted Consult postmast	e's Address
<b><u>TURN ADDRESS</u></b> completed on	3. Article Addressed to: Mr. William A. O'Toole Senior Vice President Walt Disney World Company P.O. Box 10,000 Lake Buena Vista, Florida  5. Received By: (Print Name)	7. Date of De	Type ed Mail ceipt for Merchandise elivery e's Address (Only if	Consider the control of the control
Is your RE	6. Signature: (Addressee or Agent)  K FILL MEALT C	and fee is	paid)	

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US Postal Service

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	Post Office, State, & ZIP Code Lake Buena Vista, FL			
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	Special Delivery Fee			
	Restricted Delivery Fee			
199	Return Receipt Showing to Whom & Date Delivered			
April	Return Receipt Showing to Whom, Date, & Addressee's Address			
800	TOTAL Postage & Fees	\$		
PS Form <b>3800</b> , April 1995	Postmark or Date 10/13/97 - D	RAFT PERMIT		
SF	Walt Disney	World		
à.	ID#0950111-0	05-AV		

# Walt Disney World Company Walt Disney World Resort Complex Facility ID No.: 0950111 Orange County

Initial Title V Air Operation Permit **DRAFT Permit No.:** 0950111-005-AV

### Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Telephone: 850/488-1344 Fax: 850/922-6979

### Compliance Authority:

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

Fax: 407/897-2966

# Initial Title V Air Operation Permit **DRAFT Permit No.:** 0950111-005-AV

## **Table of Contents**

Section	Page Number
Placard Page	1
I. Facility Information	2 - 5
A. Facility Description.	<b>Y</b>
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	1
C. Relevant Documents.	<b>S</b> <sub>1</sub>
II. Facility-wide Conditions	6 - 7
III. Emissions Unit(s) and Conditions	
A. Emissions Units	
Combined Cycle Combustion Turbine with Natural Gas-Fired	8 - 24
Heat Recovery Steam Generator	
B. Emissions Units	
Boilers, Hot Water Generators, Oil Heaters, and Solid Waste Dryer	25 - 34
C. Emissions Units	
Two Diesel Electric Generators (2.5 kW each)	35 - 40
D. Emissions Units	
Paint Spray Booths and Operations	41 - 45
E. Emissions Unit	
Paint Spray Booths and Operations	46 - 56
F. Emissions Unit	
North Service Area Dry Cleaning Plant	57 - 61
IV. Acid Rain Part	
A. Acid Rain, Phase II	62 - 63



# Department of **Environmental Protection**

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

Virginia B. Wetherell Secretary

Permittee:

Walt Disney World Company P.O. Box 10,000 Orlando, Florida 32830-1000 **DRAFT Permit No.:** 0950111-005-AV

Facility ID No.: 0950111 SIC Nos.: 79, 7996

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Walt Disney World Resort Complex. This facility is located at 1375 Buena Vista Drive, Orange County; 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 Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. 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 permitting authority, in accordance with the terms and conditions of this permit.

#### Referenced attachments made a part of this permit:

Alternate Sampling Procedure: ASP Number 97-B-01

Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix E-1, List of Exempt Emissions Units and/or Activities
APPENDIX TV-1, TITLE V CONDITIONS (version dated 08/11/97)
APPENDIX SS-1, STACK SAMPLING FACILITIES (dated 10/07/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (dated 10/07/96)
FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS
AND MONITORING SYSTEMS PERFORMANCE REPORT (40 CFR 60, July 1996)
BACT Determination dated 03/24/89
0950111-001-AC
0950111-002-AC
Compliance Plan dated 09/30/97 and received 10/06/97
Phase II Acid Rain Application/Compliance Plan received 12/26/95

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director Division of Air Resources Management

HLR/sms/bm

#### Section I. Facility Information.

#### Subsection A. Facility Description.

The facility is a complex of hotels, amusement park and support facilities, and a utility. The various air pollution sources are boilers, a combined cycle combustion turbine with a natural gasfired heat recovery steam generator, paint spray booths and associated operations, external combustion oil heaters and hot water heaters.

**DRAFT Permit No.:** 0950111-005-AV

Based on the initial Title V permit application received June 12, 1996, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No. (Facility ID No.)	Brief Description
North Service Area Dry Cleaning P	<u>lant</u>
-001 (LDC-1)	Dry Cleaning Unit #1
-002 (LDC-2)	Dry Cleaning Unit #2
-003 (LDC-3)	Dry Cleaning Unit #3
-004 (LDC-4)	Dry Cleaning Unit #4
North Service Area	•
-005 (NSA-15)	Sand Blast Chamber No. 1: unregulated
-006	not assigned
-007 (NSA-1)	NSA Paint Spray Booth (PSB) #1
-008 (NSA-2)	NSA PSB #2
-009 (NSA-3)	NSA PSB #3
-010 (NSA-5)	NSA Staff Shop PSB #1
-011 (NSA-6)	NSA Staff Shop PSB #2
-012 (NSA-7)	NSA Water Wash Plastisol PSB #1; includes a natural gas-fired
	curing oven
-013 (NSA-4)	NSA Metalizing PSB
-014 (NSA-8)	NSA Lofting Building PSB
-015 (NSA-9)	NSA Paint Shop PSB #4
-016 (NSA-10)	NSA Paint Shop PSB #5
-017 (NSA-11)	NSA Character Head Spray Box
-019 (NSA-12)	NSA Artist's Preparation Shop PSB
-020 (LBB-1a)	Laundry Boiler #1
-021 (LBB-1b)	Laundry Boiler #2
-022 (LBB-1c)	Laundry Boiler #3
-023 (LBB-2)	Laundry Boiler #4
-024	not assigned
-025 (NSA-14)	NSA Central Shop Paint Mixing Stations (7)
-026	not assigned
-027 (NSA-15)	NSA Paint Shop PSB #6
-028 thru -034	unassigned

DRAFT P	ermit No.:	095011	1-005-AV

E.U. ID No. (Facility ID No.)	Brief Description
Disnev's Grand Floridian Hotel	<del> </del>
-035 (GFR-1)	Main Bldg. Domestic Hot Water Generator (HWG) #1
-036 (GFR-2)	Main Bldg. Domestic HWG #2
-037 (GFR-3)	Seafood Restaurant Domestic HWG
-038 (GFR-4)	Main Bldg. Heating HWG #1
-039 (GFR-5)`	Main Bldg Heating HWG
-040 (GFR-6)	Lodge Bldg. No. 2, HWG #1
-041 (GFR-7)	Lodge Bldg. No. 2, HWG #2
-042 (GFR-8)	Lodge Bldg. No. 3, HWG #1
-043 (GFR-9)	Lodge Bldg. No. 3, HWG #2
-044 (GFR-10)	Lodge Bldg. No. 4, HWG #1
-045 (GFR-11)	Lodge Bldg. No. 4, HWG #2
-046 (GFR-12)	Lodge Bldg. No. 5, HWG #1
-047 (GFR-13)	Lodge Bldg. No. 5, HWG #2
-048 (GFR-14)	Lodge Bldg. No. 6, HWG #1
-049 (GFR-15)	Lodge Bldg. No. 6, HWG #2
-050 (GFR-16)	Swimming Pool HWG
-051 (GFR-17)	Main Bldg. Kitchen HWG #1
-052 (GFR-18)	Main Bldg. Kitchen HWG #2
-xxx (GFR-19)	Diesel Electric Generator (900 kW)
Disney Center's Studio Tours	
-053 (STB-1)	Studio HWG
-054 (STB-2A)	Studio HWG
-054 (STB-2B)	Studio HWG
-055 (STB-3)	Studio HWG
-056 (STB-4)	Studio HWG
-057 (STB-5)	Studio HWG
-058 (STB-6)	Studio HWG
-059 (STB-7)	Studio HWG
-060 (STB-8)	Studio HWG
Disnev-MGM Studio Tours	
-061 (MGM-10)	Studio Craft PSB
Buena Vista Construction	
-062 (BVC-1)	PSB
Lake Buena Vista Community Village	·
-063 (LBV-1)	PSB #1
-064 (LBV-2)	PSB #2
Disney Village	
-065 (VM-3)	Marketplace PSB
Ft. Wilderness/Golf Course	
-066 (FWR-4)	PSB
Disney's Yacht & Beach Club	
-067 (YBC-3)	PSB
EPCOT Center	
-068 (EP-1)	Maintenance PSB
-069 (EP-2)	Display PSB
-070 (EP-3)	Marina PSB
South Service Area	
-071 (SSA-1)	Traffic Control Equipment PSB

DRAFT Permit No.:	0950111-005-AV

E.U. ID No. (Facility ID No.)	Brief Description
North Service Area	
-072 (LAU-1)	Laundry Oil Heater #1
-072 (LAU-2)	Laundry Oil Heater #2
-073	unassigned
-074	unassigned
Magic Kingdom	DCD #1
-075 (MK-1)	PSB #1
EPCOT Central Energy Plant	·
-076 (EPCOT HWG-1)	EPCOT Water Heater #1 - West: unregulated
-077 (EPCOT HWG-2)	EPCOT Water Heater #2 - Middle: unregulated
-078 (EPCOT HWG-3)	EPCOT Water Heater #3 - East: unregulated
-079 (EPCOT DG-1)	Diesel Electric Generator #1 (2.5 MW)
-080 (EPCOT DG-2)	Diesel Electric Generator #2 (2.5 MW)
North Service Area	
-081 (NSA-xx)	Hot Water Generator #3: unregulated
-082	unassigned
<u>Disnev's Blizzard Beach</u>	
-083 (BB-1)	Boiler
-084 (BB-2)	Boiler
-085 (BB-3)	HWG
-086 (BB-4)	HWG
-087 (BB-5)	HWG
Reedy Creek Improvement District	
-088	Combined Cycle CT with a natural gas-fired Heat Recovery
	Steam Generator
Construction Landfill	Discal Floatric Community #1
-089 (CL-1)	Diesel Electric Generator #1
-089 (CL-2)	Diesel Electric Generator #2
Disney's Boardwalk Resort	Boiler
-090 (BDW-1)	Boiler
-090 (BDW-2) -091 (BDW-3)	HWG
-091 (BDW-3)   -091 (BDW-4)	HWG
-091 (BDW-4) -091 (BDW-5)	HWG
-091 (BDW-5)	HWG
-091 (BDW-0)	HWG
-091 (BDW-7)	HWG .
-091 (BDW-8)	HWG
-091 (BDW-10)	HWG
-091 (BDW-10)	unassigned
Magic Kingdom	anassigned
-093 (MK-2)	PSB #2
Boardwalk Resort	100 112
-094 (BR-1)	PSB #1
-095	HWG (2)
-096	Pool HWG
-097	HWG (4)
-098	HWG (8)
1 070	11

E.U. ID No. (Facility ID No.)	Brief Description	
Boardwalk Resort		
-099	Pool HWG (2)	
-100 ·	HWG (20)	
-101	Diesel electric generators (3)	
Coronado Springs Resort		
-102 ( <i>CSR</i> -1)	PSB #1	
<u>Disnev's Animal Kingdom</u>	, ,	
-103	Conservation Station Boiler	
-104	Africa Support Building Boiler	
-105	Cast Cafe[1.8] Boiler	
-106	Tusker House Boiler	
-107	Restaurantosaurus Boiler	
-108	Countdown to Extinction Boiler	
-109	Cast Cafe [1.26] HWG	
-110	Safari Fare Boiler	
Reedv Creek Energy Services Compo	<u>st</u>	
<u>Facility</u>		
-111	Compost Facility Lundell Solid Waste Dryer	
<u>Disnev's All Star Resort</u>	;	
-xxx	80 HWG	

Unregulated Emissions Units and/or Activities

{Permitting note: For Unregulated Emissions Units and/or Activities, see Appendix U-1 (attached).}

PSB #1

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only: Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

#### These documents are on file with the permitting authority:

Initial Title V Permit Application received June 12, 1996.

Supplementary information received June 6, 1997.

Supplementary information received August 29, 1997.

Supplementary information received October 6, 1997.

PSD-FL-123.

-xxx (ASR-1)

0950111-001-AC.

0950111-002-AC.

Section II. Facility-wide Conditions.

#### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit. {Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

**DRAFT Permit No.:** 0950111-005-AV

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; AO48-155895; AO48-183381; and, AO48-254323]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.

- 4. <u>Prevention of Accidental Releases (Section 112(r) of CAA)</u>. If required by 40 CFR 68, the permittee shall submit to the implementing agency:
- a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and,
  b. certification forms and/or RMPs according to the promulgated rule schedule.
  [40 CFR 68]
- 5. <u>Unregulated Emissions Units and/or Activities.</u> Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit. [Rule 62-213.440(1), F.A.C.]
- 6. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit. [Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]
- 7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1)(a), F.A.C.]

8. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility during operations include: chemical or water application to unpaved roads, unpaved yard areas, and storage piles; paving and maintenance of roads, parking areas and plant grounds; landscaping and planting of vegetation; confining abrasive blasting where possible; and other techniques, as necessary. Also, for the solid waste disposal area, wetting agents shall be applied. [Rule 62-296.320(4)(c)2., F.A.C

DRAFT Permit No.: 0950111-005-AV

- 9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]
- 10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Central District office at the following address:

Department of Environmental Protection Central District Office 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767 Telephone: 407/894-7555 Fax: 407/897-2966

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4

Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9099

Fax: 404/562-9095

12. There shall be no discharges of liquid effluents or contaminated runoff to surface or ground water without approval from the Department.

[AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; AO48-155895; AO48-183381; and, AO48-254323]

13. This permit does not preclude compliance with any applicable local program permitting requirements and regulations.

[AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; AO48-155895; AO48-183381; and, AO48-254323]

Walt Disney World Company Walt Disney World Resort Complex Page 8

Section III. Emissions Units.

# Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description	
-088	Combined Cycle Combustion Turbine with Natural Gas-Fired Heat Recovery Steam Generator	

This emissions unit is a combined cycle combustion turbine (CT) system followed by a natural gas-fired duct burner and a heat recovery steam generator (HRSG). It consists of a GE LM 5000 combustion turbine which powers a 38 MW (nominal rating) generator. Nitrogen oxide ( $NO_X$ ) emissions are controlled by the use of water injection. The HRSG provides steam to power a nominal 8.5 MW steam turbine. The CT can be fired either by natural gas or No. 2 fuel oil. The duct burner can only be fired by natural gas. The compressor inlet air will be conditioned by an evaporative cooler (cooling tower) when needed. The CT will be started by the use of a Black Start Cummings No. 2 fuel oil fired emergency electric generator (which is exempt from permitting requirements).

The existing emissions unit is currently involved in a modification, authorized by construction permit 0950111-002-AC, which will consist of replacing the existing combusters in the CT with extended venturi combusters. This modification will reduce the frequency of combuster maintenance and replacement, but will increase the formation of carbon monoxide (CO). In order to avoid a significant increase in CO emissions, a catalytic oxidation unit will be placed into service in the ductwork directly following the CT, providing a CO removal efficiency of about 80%. The resultant net increase in CO emissions is still below the previously established CO emissions limits of 25 lbs/hr and 110 tons per year.

{Permitting notes: The emissions unit is regulated under NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rules 62-204.800(7)(b)38. & 62-204.800(7)(b)3., F.A.C., respectively; and, PSD-FL-123, Prevention of Significant Deterioration (PSD), in Rule 62-212.400, F.A.C. Stack height: 65 feet, exit diameter: 11.1 feet, exit temperature: 285 °F, and, actual volumetric flow rate: 301,777 acfm. This unit began commercial operation April 1989.}

#### The following specific conditions apply to the emissions unit listed above:

A.0. This emissions unit is currently authorized to operate under the conditions of the attached permit 0950111-001-AC. After the modifications authorized by AC permit 0950111-002-AC (also attached) have been completed and the testing and reporting requirements contained in 40 CFR 60.8 have been satisfied, the following operating conditions will apply: [Rule 62-213.440, F.A.C.; and, 40 CFR 60.8.]

#### Essential Potential to Emit (PTE) Parameters

[Permitting note: Unless stated so, the following conditions apply to both the CT and HRSG.]

**DRAFT Permit No.:** 0950111-005-AV

#### General

A.1. <u>Definitions</u>. For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee.

[40 CFR 60.2; Rule 62-204.800(7)(a), F.A.C.]

- A.2. <u>Circumvention</u>. No owner or operator subject to the provisions of 40 CFR 60 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

  [40 CFR 60.12]
- A.3. <u>Modifications</u>. The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [40 CFR 60.14; and, 0950111-001-AC]

#### **Essential Potential to Emit (PTE) Parameters**

A.4. <u>Permitted Capacity</u>. The maximum heat input to the Combustion Turbine (CT) and the duct burner, combined, shall not exceed 450 MMBtu/hr, with the normal duct burner heat input rate contribution of 23 MMBtu/hr. When the CT is not in operation, the duct burner heat input rate shall not exceed 198 MMBtu/hr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 40 CFR 60.332(b); PSD-FL-014 & PSD-FL-014(A); and, 0950111-001-AC]

A.5. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.48**. [Rule 62-297.310(2), F.A.C.]

#### A.6. Methods of Operation - Fuels.

- a. Natural gas shall be the primary fuel fired in the CT. New No. 2 distillate fuel oil may be fired as "back-up" fuel in the CT, only. Only natural gas shall be fired in the duct burner. The burning of other fuels requires review, public notice, and approval through the preconstruction process (Chapters 62-210 and 62-212, F.A.C.).
- b. New No. 2 distillate fuel oil can be used as a backup fuel in the CT, only, for a maximum of 336 hours per year.

[Rule 62-213.410, F.A.C.; and, 0950111-001-AC]

A.7. <u>Hours of Operation</u>. This emissions unit may operate continuously, i.e., 8760 hours per year.

**DRAFT Permit No.:** 0950111-005-AV

[Rule 62-210.200(PTE), F.A.C.; 0950111-001-AC; and, PSD-FL-123]

#### **Emission Limitations and Standards**

A.8. Nitrogen Oxides. Nitrogen oxides emissions, expressed as  $NO_X$ , shall not exceed 82 ppmv by volume at 15 percent oxygen and on a dry basis (132 lbs/hr) during conditions of peak loading (based on 40°F), or 68 ppmv by volume at 15 percent oxygen and on a dry basis (100 lbs/hr) for a 12-month rolling average, or 17 tons per year, while burning new No. 2 distillate fuel oil. The 12-month rolling average emissions will be calculated using hourly averages 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.

[0950111-002-AC]

A.9. <u>Nitrogen Oxides</u>. Nitrogen oxides emissions, expressed as NO<sub>X</sub>, shall not exceed 74 ppmv 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 ppmv 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 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<sub>X</sub> 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. Compliance with the emissions limits of 40 CFR 60.44b(a)(4) (HRSG) is determined on a 30-day rolling average basis.

[40 CFR 60.44b(a)(4), (h) & (i); and, 0950111-002-AC]

A.10. <u>Nitrogen Oxides</u>. 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.)

[0950111-002-AC]

- A.11. <u>Sulfur Dioxide</u>. Sulfur dioxide emissions shall not exceed 58 ppmv 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, 0950111-001-AC]
- A.12. <u>Sulfur Dioxide</u>. The maximum allowed sulfur dioxide emissions shall not exceed 1.2 lbs/hr or 5.1 tons per year, while burning natural gas. [0950111-001-AC]

A.13. <u>Sulfur Dioxide - Sulfur Content</u>. 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, 0950111-001-AC]

**DRAFT Permit No.:** 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.

[0950111-001-AC]

A.15. <u>Particulate Matter</u>. Particulate matter shall not exceed 0.8 lbs/hr or 3.5 tons per year, while burning natural gas.
[0950111-001-AC]

A.16. <u>Carbon Monoxide</u>. Carbon monoxide emissions shall not exceed 24 lbs/hr or 4 tons per year, while burning new No. 2 distillate fuel oil. [0950111-002-AC]

A.17. <u>Carbon Monoxide</u>. Carbon monoxide emissions shall not exceed 25 lbs/hr or 110 tons per year, while burning natural gas.
[0950111-002-AC]

A.18. Volatile Organic Compounds (VOCs. VOC emissions shall not exceed 6 lbs/hr or 26 tons per year, while burning new No. 2 distillate fuel oil.
[0950111-001-AC]

A.19. <u>Volatile Organic Compounds (VOCs</u>. VOC emissions shall not exceed 6 lbs/hr or 1 ton per year, while burning natural gas. [0950111-001-AC]

A.20. <u>Visible Emissions</u>. Visible emissions shall not exceed 10 percent opacity while burning new No. 2 distillate fuel oil. [0950111-002-AC]

A.21. <u>Visible Emissions</u>. Visible emissions shall not exceed 5 percent opacity while burning natural gas.

[0950111-002-AC]

#### **Excess Emissions**

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.]

**DRAFT Permit No.:** 0950111-005-AV

- 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)]
- A.25. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:
- (1). Nitrogen oxides. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in 40 CFR 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a). [40 CFR 60.334(c)(1)]

#### **Monitoring of Operations**

- A.26. 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 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)]
- A.27. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG, and using water injection to control NOx emissions shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ±5.0 percent and shall be approved by the Administrator.

  [40 CFR 60.334(a)]

A.28. The following custom fuel monitoring schedule shall be used at this facility:

#### **Custom Fuel Monitoring Schedule for Natural Gas**

- 1) Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel being fired in the gas turbine (CT).
- 2) Sulfur Monitoring:
  - a) Analysis for sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The approved methods are ASTM D1072-80, ASTM D3030-81, ASTM D3246-83, and ASTM D4084-82 as referenced in 40 CFR 6O.335(b)(2), or the latest edition(s).

**DRAFT Permit No.:** 0950111-005-AV

- b) Effective the date of this custom schedule, sulfur monitoring shall be conducted at least once per calendar quarter. Sulfur analyses results shall be reported in units of grains of sulfur per 100 cubic feet of natural gas and shall be submitted with the quarterly excess emissions report required by 40 CFR 60.7. (EPA's letter dated June 15, 1994).
- c) The sulfur content of the fuel shall also be expressed as maximum sulfur dioxide emissions (lb/hr) and shall be consistent with the limits specified in Specific Condition 5 of permit AC48-137740 (see specific conditions A.11 & A.12. of this permit).
- d) Should any sulfur analysis as required in items 2(b), above, indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
- 3) If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
- 4) Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of (five) years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

#### Custom Fuel Monitoring Schedule for Liquid Fuel

Sulfur and nitrogen content of the liquid fuel:
 Upon delivery of the fuel, a sample shall be randomly taken from one compartment of each truck and composited for analysis (for verification of the vendor data) by a third party laboratory using, ASTM Method D-3228 for nitrogen analysis, and ASTM Method D-4294 for sulfur analysis.

[40 CFR 60.334(b)(2); and, AC48-137740 & PSD-FL-123 as modified on October 11, 1994]

- A.29. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:
- (1) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.

(2) If the turbine is supplied its fuel without intermediate bulk storage, the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with 40 CFR 60.334(b).

DRAFT Permit No.: 0950111-005-AV

[40 CFR 60.334(b)(1) & (2)]

A.30. The owner or operator of an affected facility (HRSG) which is subject to the nitrogen oxides standards of 40 CFR 60.44b(a)(4) is not required to install or operate a continuous monitoring system to measure nitrogen oxides emissions. See specific condition **A.9**. [40 CFR 60.48b(h)]

#### A.31. Determination of Process Variables.

- (a) <u>Required Equipment</u>. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

#### **Continuous Monitoring Requirements**

- A.32. For the purposes of 40 CFR 60.13, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of 40 CFR 60.13 upon promulgation of performance specifications for continuous monitoring systems under Appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, Appendix F of 40 CFR 60, unless otherwise specified in an applicable subpart or by the Administrator. Appendix F is applicable December 4, 1987. [40 CFR 60.13(a)]
- A.33. All continuous monitoring systems (CMS) or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Additional procedures for location of continuous monitoring systems contained in the applicable Performance Specifications of Appendix B of 40 CFR 60 shall be used. [40 CFR 60.13(f)]

#### **Test Methods and Procedures**

A.34. Subsequent to the initial test, annual stack testing for CO emissions at full capacity load conditions shall be performed according to an annual test protocol developed jointly by RCID and FDEP. This protocol will specify the test methods and procedures to be used during the annual compliance testing. Using the established procedures of this protocol as a guide, simultaneous testing full capacity load conditions shall be conducted for CO, NO<sub>X</sub> and VE. EPA Method 10 shall be used for CO, EPA Methods 7e or 20 shall be used for NO<sub>X</sub> and EPA Method 9 shall be used for VE. Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO<sub>X</sub> and CO. The test methods shall be in accordance with Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A. [40 CFR 60.44b(a); Rules 62-213.440 and 62-297.401, F.A.C.; and, 0950111-001-AC & 0950111-002-AC]

DRAFT Permit No.: 0950111-005-AV

A.35. Nitrogen Oxides. To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Department to determine the nitrogen content of the fuel being fired.

[40 CFR 60.335(a)]

A.36. <u>Nitrogen Oxides</u>. The owner or operator shall determine compliance with the nitrogen oxides standard in 40 CFR 60.332 as follows:

(1) The nitrogen oxides emission rate  $(NO_X)$  shall be computed for each run using the following equation:

$$NO_X = (NO_{XO}) (Pr/Po)^{0.5} e^{19(Ho-0.00633)} (288°K/Ta)^{1.53}$$

where:

 $NO_X$  = emission rate of  $NO_X$  at 15 percent  $O_2$  and ISO standard ambient conditions, volume percent.

 $NO_{XO}$  = observed  $NO_X$  concentration, ppm by volume.

 $P_r$  = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.

P<sub>O</sub> = observed combustor inlet absolute pressure at test, mm Hg.

 $H_0$  = observed humidity of ambient air, g  $H_2O/g$  air.

e = transcendental constant, 2.718.

 $T_a$  = ambient temperature, °K.

[40 CFR 60.335(c)(1)]

A.37. The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the permitted  $NO_X$  standard at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. [40 CFR 60.335(c)(2)]

A.38. <u>Nitrogen Oxides and Sulfur Dioxide</u>. The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:

DRAFT Permit No.: 0950111-005-AV

- (3). EPA Method 20 (40 CFR 60, Appendix A) shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The  $NO_X$  emissions shall be determined at each of the load conditions specified in 40 CFR 60.335(c)(2).

  [40 CFR 60.335(c)(3)]
- A.39. Sulfur Dioxide Sulfur Content. The owner or operator shall determine compliance with the sulfur content standard of 0.4 percent, by weight, as follows: ASTM D 2880-96, or the latest edition, shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, D 3246-92, or the latest edition, shall be used for the sulfur content of gaseous fuels (incorporated by reference-see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

  [40 CFR 60.335(d)]
- A.40. Nitrogen and Sulfur Contents. To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335(a) and 40 CFR 60.335(d) of 40 CFR 60.335 to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

  [40 CFR 60.335(e)]
- A.41. <u>Carbon Monoxide</u>. EPA Method 10 pursuant to Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A, shall be used to determine compliance with the carbon monoxide standards in specific conditions **A.16**. & **A.17**.
- A.42. <u>Visible Emissions</u>. EPA Method 9 pursuant to Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A, shall be used to determine compliance with the visible emissions standard in specific conditions **A.20.** & **A.21**. [Rule 62-297.401, F.A.C.; and, 40 CFR 60, Appendix A]
- A.43. Opacity. Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.

  [40 CFR 60.11(a)]
- A.44. Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit

during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

[40 CFR 60.8(c)]

**DRAFT Permit No.:** 0950111-005-AV

- A.45. The owner or operator shall provide, or cause to be provided, stack sampling and performance testing facilities as follows:
- (1) Sampling ports adequate for test methods applicable to such facilities.
- (2) Safe sampling platform(s).
- (3) Safe access to sampling platform(s).
- (4) Utilities for sampling and testing equipment.
- [40 CFR 60.8(e)(1), (2), (3) & (4); and, PSD-FL-014]
- A.46. <u>Required Stack Sampling Facilities</u>. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. [Rule 62-297.310(6), F.A.C.]
- A.47. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.48. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

A.49. <u>Calculation of Emission Rate</u>. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

#### A.50. Applicable Test Procedures.

- (a) Required Sampling Time.
  - 1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

**DRAFT Permit No.:** 0950111-005-AV

- 2. Opacity Compliance Tests. When either EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
  - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (d) <u>Calibration of Sampling Equipment</u>. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached). [Rule 62-297.310(4), F.A.C.]
- A.51. <u>Frequency of Compliance Tests</u>. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required. (a) General Compliance Testing.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - a. Did not operate; or,
    - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
  - 4. During each federal fiscal year (October 1 September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
    - a. Visible emissions, if there is an applicable standard;
    - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and,
    - c. Each NESHAP pollutant, if there is an applicable emission standard.

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

**DRAFT Permit No.:** 0950111-005-AV

- 9. The owner or operator shall notify the Department, 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.
- (b) <u>Special Compliance Tests</u>. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

- A.52. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
  - a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
- c. only liquid fuel(s) for less than 400 hours per year. [Rule 62-297.310(7)(a)4., F.A.C.]

#### Recordkeeping and Reporting Requirements

A.53. To determine compliance with the oil firing heat input limitation, the permittee shall maintain daily records of fuel oil consumption and hourly usage for the turbine and the heating value for the fuel oil. All records shall be maintained for a minimum of five (5) years after the date of each record and shall be made available to representatives of the Department upon request.

[Rule 62-213.440, F.A.C.]

- A.54. The owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification as follows:
- (4) A notification of any <u>physical or operational change</u> to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

  [40 CFR 60.7(a)(4)]

**DRAFT Permit No.:** 0950111-005-AV

A.55. The owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or, any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

- A.56. The owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report and/or a summary report form [see 40 CFR 60.7(d)] to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or, the CMS data are to be used directly for compliance determination, in which case quarterly reports shall be submitted; or, the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each calendar half (or quarter, as appropriate). Written reports of excess emissions shall include the following information:
- (1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.
- (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
- (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
- (4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report. [40 CFR 60.7(c)(1), (2), (3), and (4)]
- A.57. The summary report form shall contain the information and be in the format shown in Figure 1 (attached) unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility.
- (1) If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form

shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator.

(2) If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted. [40 CFR 60.7(d)(1) and (2)]

**DRAFT Permit No.:** 0950111-005-AV

{See attached Figure 1: Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance} (electronic file name: figure 1.doc)

- A.58. (1) Notwithstanding the frequency of reporting requirements specified in 40 CFR 60.7(c), an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:
- (i) For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods) the affected facility's excess emissions and monitoring systems reports submitted to comply with a standard under this part continually demonstrate that the facility is in compliance with the applicable standard;
- (ii) The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in 40 CFR 60, Subpart A, and the applicable standard; and,
- (iii) The Administrator does not object to a reduced frequency of reporting for the affected facility, as provided in 40 CFR 60.7(e)(2). The frequency of reporting of excess emissions and monitoring systems performance (and summary) reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the required recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.
- (3) As soon as monitoring data indicate that the affected facility is not in compliance with any emission limitation or operating parameter specified in the applicable standard, the frequency of reporting shall revert to the frequency specified in the applicable standard, and the owner or operator shall submit an excess emissions and monitoring systems performance report (and summary report, if required) at the next appropriate reporting period following the noncomplying event. After demonstrating compliance with the applicable standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard as provided for in 40 CFR 60.7(e)(1) & (e)(2). [40 CFR 60.7(e)(1)]

A.59. The owner or operator subject to the provisions of 40 CFR 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and, all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least 5 (five) years following the date of such measurements, maintenance, reports, and records. [40 CFR 60.7(f); Rule 62-213.440(1)(b)2.b., F.A.C.]

**DRAFT Permit No.:** 0950111-005-AV

A.60. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department [Rule 62-210.700(6), F.A.C.]

#### A.61. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the following information:
  - 1. The type, location, and designation of the emissions unit tested.
  - 2. The facility at which the emissions unit is located.
  - 3. The owner or operator of the emissions unit.
  - 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  - 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  - 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  - 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  - 8. The date, starting time and duration of each sampling run.
  - 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  - 10. The number of points sampled and configuration and location of the sampling plane.
  - 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  - 12. The type, manufacturer and configuration of the sampling equipment used.
  - 13. Data related to the required calibration of the test equipment.

- 14. Data on the identification, processing and weights of all filters used.
- 15. Data on the types and amounts of any chemical solutions used.
- 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.

**DRAFT Permit No.:** 0950111-005-AV

- 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
- 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
- 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
- 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
- 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

A.62. In each compliance test report, submit the maximum input/production rate at which each emissions unit was operated since the most recent compliance test. [Rule 62-213.440, F.A.C.]

A.63. Reports under 40 CFR 60.7(c) are required for periods of  $NO_X$  excess emissions, which are defined in specific condition **A.25**. [40 CFR 60.334(c)(1)]

- A.64. Submit a quarterly report for each emissions unit for the following within 30 days at the end of each quarter:
- a. Total hours of operation.
- b. Per 40 CFR 60.334(c)(1) for  $NO_X$ , any one hour period in which the water to fuel ratio falls below 0.6/1.0.

[Rule 62-213.400, F.A.C.; and, 0950111-002-AC]

- A.65. <u>HRSG</u>. The owner or operator of an affected facility (HRSG) subject to the nitrogen oxides standards under 40 CFR 60.44b shall maintain records of the following information for each steam generating unit operating day:
- (1) Calendar date.
- (2) The average hourly nitrogen oxides emission rates (expressed as NO<sub>2</sub>) (ng/J or lb/million Btu heat input) measured or predicted.
- (3) The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.

**DRAFT Permit No.:** 0950111-005-AV

- (4) Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 40 CFR 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
- (5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
- (6) Identification of times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.

[40 CFR 60.49b(g)(1) thru (6); and, 0950111-002-AC]

Section III. Emissions Units.

## Subsection B. This section addresses the following emissions units.

E.U./Facility I.D.	Brief Description	Manufacturer	Model
North Service Area	<del></del>		
-020 (LBB-1a)	Laundry Boiler #1	York-Shipley	300HP
-021 (LBB-1b)	Laundry Boiler #2	York-Shipley	300HP
-022 (LBB-1c)	Laundry Boiler #3	York-Shipley	350HP
-023 (LBB-2)	Laundry Boiler #4		
Disney's Grand			•
Floridian Hotel			
-035 (GFR-1)	Main Bldg. Domestic Hot Water Generator (HWG) #1	A. O. Smith	BTP-600-2500
-036 (GFR-2)	Main Bldg. Domestic HWG #2	A. O. Smith	BTP-600-2500
-037 (GFR-3)	Seafood Restaurant Domestic HWG	A. O. Smith	BIP-400-2500
-038 (GFR-4)	Main Bldg. Heating HWG #1	Burnnam	3PW-200-50-LB
-039 (GFR-5)	Main Bldg. Heating HWG	Burnnam	#PW-200-50-LB
-040 (GFR-6)	Lodge Bldg. No. 2, HWG #1	Bryan	K-300-WT
-041 (GFR-7)	Lodge Bldg. No. 2, HWG #2	Bryan	K-300-WT
-042 (GFR-8)	Lodge Bldg. No. 3, HWG #1	Bryan	CL-210
-043 (GFR-9)	Lodge Bldg. No. 3, HWG #2	Bryan	CL-210
-044 (GFR-10)	Lodge Bldg. No. 4, HWG #1	Bryan	CL-300
-045 (GFR-11)	Lodge Bldg. No. 4, HWG #2	Bryan	CL-300
-046 (GFR-12)	Lodge Bldg. No. 5, HWG #1	Bryan .	K-350-WT
-047 (GFR-13)	Lodge Bldg. No. 5, HWG #2	Bryan	K-350-WT
-048 (GFR-14)	Lodge Bldg. No. 6, HWG #1	Bryan	K-350-WT
-049 (GFR-15)	Lodge Bldg. No. 6, HWG #2	Bryan	K-350-WT
-050 (GFR-16)	Swimming Pool HWG	Ray Pak	2001
-051 (GFR-17)	Main Bldg. Kitchen HWG #1	Nickelshield	875N200ATP
-052 (GFR-18)	Main Bldg. Kitchen HWG #2	Nickelshield	875N200ATP
-xxx (GFR-19)	Diesel Electric Generator (900 kW)	Cummins	KTTA38-GS-1
Disney Center's			
Studio Tours			
-053 (STB-1)	Studio HWG	A. O. Smith	HWT-1240
-054 (STB-2A)	Studio HWG Studio HWG	Bryan	CL-150
-054 (STB-2B)	Studio HWG Studio HWG	A. O. Smith	HWT-1240
-054 (STB-2B) -055 (STB-3)	Studio HWG Studio HWG		CL-120
-056 (STB-4)	Studio HWG Studio HWG	Bryan	CL-120 CL-180
-056 (STB-4) -057 (STB-5)	Studio HWG Studio HWG	Bryan A. O. Smith	HWT-1240
-058 (STB-6)	Studio HWG	unknown	unknown
-059 (STB-7) -060 (STB-8)	Studio HWG Studio HWG	Bryan A. O. Smith	CL-120 HWT-1240
North Service Area			
-072 (LAU-1)	Laundry Oil Heater #1	Fulton Thermal Corp	FT-C 1000
-072 (LAU-1) -072 (LAU-2)	Laundry Oil Heater #1 Laundry Oil Heater #2	Fulton Thermal Corp	FT-C 1000 FT-C 1000
-0/2 (LAU-2)	Lauliury Oil Ficator #2	runon Thermal Corp	F1-C 1000

**DRAFT Permit No.:** 0950111-005-AV

**DRAFT Permit No.:** 0950111-005-AV

E.U./Facility I.D.	Brief Description	Manufacturer	. <u>Model</u>
Disney's Blizzard			
Beach			
-083 (BB-1)	Boiler	Ajax Boiler, Inc.	WG-1375
-084 (BB-2)	Boiler	Ajax Boiler, Inc.	WG-1375
-085 (BB-3)	HWG	Ajax Boiler, Inc.	XGF-6500-W
-086 (BB-4)	HWG	Ajax Boiler, Inc.	XGF-6500-W
-080 (BB-4) -087 (BB-5)	HWG ·	Ajax Boiler, Inc.	XGF-1500-W
-087 (BB-3)	HWG	Ajax Boller, Ilic.	XG1-1300-W
Construction			<b>.</b>
<u>Landfill</u>			
-089 (CL-1)	Diesel Electric Generator #1	Coleman/Cummings	4BG +
-089 (CL-2)	Diesel Electric Generator #2	Coleman/Kubota-	CK05-15M/V1902-B61
Disnev's Boardwalk			
Resort			
-090 (BDW-1)	Boiler	Cleaver Brooks	CBE-700-250
-090 (BDW-2)	Boiler	Cleaver Brooks	CBE-700-250
-091 (BDW-3)	HWG	Teledyne-Loars	VW-4050-IN-09
-091 (BDW-4)	HWG	Teledyne-Loars	VW-4050-IN-09
-091 (BDW-5)	HWG	Teledyne-Loars	VW-4050-IN-09
-091 (BDW-6)	HWG	Teledyne-Loars	VW-4500-1N-09
-091 (BDW-7)	HWG	Teledyne-Loars	VW-4500-1N-09
-091 (BDW-8)	HWG	Teledyne-Loars	PW-1430-IN-09
-091 (BDW-9)	HWG	Teledyne-Loars	PW-1430-IN-09
-091 (BDW-10)	HWG	Rayback	P-3001
Disney's Animal	·	•	
Kingdom			
-103	Conservation Station Boiler	Teledyne-Loars	2450
-104	Africa Support Building Boiler	Teledyne-Loars	1825
-105	Cast Cafe[1.8] Boiler	Lochinvar	CHN-1800
-106	Tusker House Boiler	Ajax Boiler, Inc.	WNG-1750-DMR
-107	Restaurantosaurus Boiler	Teledyne-Loars	Mighty Therm 1670
-107	Countdown to Extinction Boiler	Ajax Boiler, Inc.	WNG-1500-DMR
-108	Cast Cafe [1.26] HWG		
I .		Lochinvar	CFN-1260
-110	Safari Fare Boiler	Teledyne-Loars	HH-1200
Reedv Creek Energy			
Services Compost			
<u>Facility</u>	•		
-111	Compost Facility Lundell Solid Waste Dryer	Eclipse Combustion	AH-160
Disney's All Star			
Resort			
-xxx	80 HWG	unknown	unknown
	<u> </u>		

**DRAFT Permit No.:** 0950111-005-AV

This emissions unit grouping includes natural gas fired boilers, natural gas fired hot water generators, a propane fired solid waste dryer, and two natural gas oil heaters. All of the hot water generators listed were issued air construction permits and, probably, should have been exempted from permitting or classified as unregulated emissions units, as many are.

[Permitting notes: The laundry boilers are subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; the other boilers are regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators With Less Than 250 MMBtu Per Hour Heat Input; permitting of the diesel electric generators, the solid waste dryer, and the hot water generators was imposed under Rule 62-210.300, F.A.C., Permits Required.}

## The following specific conditions apply to the emissions units listed above:

#### Essential Potential to Emit (PTE) Parameters

## B.1. Permitted Capacity. The maximum operation rates are as follows:

E.U./Facility I.D.	Brief Description	Permitted Capacity
North Service Area		MMBtu/hr Heat Input
-020 (LBB-1a)	Laundry Boiler #1	39.6 (total: #1, #2 & #3)
-021 (LBB-1b)	Laundry Boiler #2	39.6 (total: #1, #2 & #3)
-022 (LBB-1c)	Laundry Boiler #3	39.6 (total: #1, #2 & #3)
-023 (LBB-2)	Laundry Boiler #4	7.8
Disney's Grand Floridian Beach		
<u>Resort</u>		MMBtu/hr Heat Input
-035 (GFR-1)	Main Bldg. Domestic Hot	2.5
	Water Generator (HWG) #1	
-036 (GFR-2)	Main Bldg. Domestic HWG #2	2.5
-037 (GFR-3)	Seafood Restaurant Domestic HWG	2.5
-038 (GFR-4)	Main Bldg. Heating HWG #1	8.4
-039 (GFR-5)'	Main Bldg. Heating HWG	8.4
-040 (GFR-6)	Lodge Bldg. No. 2, HWG #1	3.0
-041 (GFR-7)	Lodge Bldg. No. 2, HWG #2	3.0
-042 (GFR-8)	Lodge Bldg. No. 3, HWG #1	2.1
-043 (GFR-9)	Lodge Bldg. No. 3, HWG #2	2.1
-044 (GFR-10)	Lodge Bldg. No. 4, HWG #1	3.0
-045 (GFR-11)	Lodge Bldg. No. 4, HWG #2	3.0
-046 (GFR-12)	Lodge Bldg. No. 5, HWG #1	3.5
-047 (GFR-13)	Lodge Bldg. No. 5, HWG #2	3.5
-048 (GFR-14)	Lodge Bldg. No. 6, HWG #1	3.5
-049 (GFR-15)	Lodge Bldg. No. 6, HWG #2	3.5
-050 (GFR-16)	Swimming Pool HWG	2.1
-051 (GFR-17)	Main Bldg. Kitchen HWG #1	0.7
-052 (GFR-18)	Main Bldg. Kitchen HWG #2	0.7

Page 28	•	
E.U./Facility I.D.	Brief Description	Permitted Capacity
Disney Center's Studio Tours	·	MMBtu/hr Heat Input
-053 (STB-1)	Studio HWG	1.3
-054 (STB-2A)	Studio HWG Studio HWG	1.6
` ,	Studio HWG Studio HWG	1.3
-054 (STB-2B)	Studio HWG Studio HWG	1.3
-055 (STB-3)		
-056 (STB-4)	Studio HWG	1.9
-057 (STB-5)	Studio HWG	1.3
-058 (STB-6)	Studio HWG	2.7
-059 (STB-7)	Studio HWG	1.3
-060 (STB-8)	Studio HWG	1.3
North Service Area		MMBtu/hr Heat Input
-072 (LAU-1)	Laundry Oil Heater #1	26 (total: #1 & #2)
-072 (LAU-2)	Laundry Oil Heater #2	26 (total: #1 & #2)
Disnev's Blizzard Beach		MMBtu/hr Heat Input
-083 (BB-1)	Boiler	1.38
-084 (BB-2)	Boiler	1.38
-085 (BB-3)	HWG	6.5
-086 (BB-4)	HWG	6.5
-087 (BB-5)	HWG	1.5
-007 (BB-3)	nwo	1.5
Construction Landfill	,	MMBtu/hr Heat Input
-089 (CL-1)	Diesel Electric Generator #1	0.155
-089 (CL-2)	Diesel Electric Generator #2	0.057
Disnev's Boardwalk Resort	·	MMBtu/hr Heat Input
-090 (BDW-1)	Boiler	10.46
-090 (BDW-2)	Boiler	10.46
-091 (BDW-3)	HWG	4.05
-091 (BDW-4)	HWG	4.05 -
-091 (BDW-5)	HWG	4.05
-091 (BDW-6)	HWG	4.5
-091 (BDW-7)	HWG	4.5
-091 (BDW-8)	HWG	1.43
-091 (BDW-9)	HWG	1.43
-091 (BDW-10)	HWG	3.4
Disum's Animal Kinadom	_	MMaft/rolling 12 mths
<u>Disney's Animal Kingdom</u> -103	Conservation Station Boiler	MMcft/rolling 12-mths 21.5
-103	Africa Support Building Boiler	16.0
ſ		
-105 -106	Ćast Cafe[1.8] Boiler	15.8
l .	Tusker House Boiler	15.3
-107	Restaurantosaurus Boiler	14.6
-108	Countdown to Extinction Boiler	13.1
-109	Cast Cafe [1.26] HWG	11.0
-110	Safari Fare Boiler	10.5

**DRAFT Permit No.:** 0950111-005-AV

E.U./Facility I.D.	Brief Description	Permitted Capacity
Reedy Creek Energy Services Compost Facility -111	Compost Facility Lundell Solid Waste Dryer	Gallons/rolling 12-mths 383 x 10 <sup>3</sup>
Disnev's All Star Resort -xxx	80 HWG	MMBtu/year 925,000 (total)

**DRAFT Permit No.:** 0950111-005-AV

[AC48-149215; AC48-151515; AC48-156350; AC48-236247; AC48-243687; AC48-264605; AC48-268376; AC48-271849; 0950111-011-AC; and, Rules 62-4.070, 62-210.200(PTE) and 62-296.406(2) & (3), F.A.C.]

B.2. <u>Emissions Unit Operating Rate Limitation After Testing</u>. See specific condition **B.12**. [Rule 62-297.310(2), F.A.C.]

## B.3. Methods of Operation - Fuels.

- a. Unless stated, the hot water generators are allowed to fire natural gas only.
- b. For the All Star Resort hot water generators and the North Service Area Laundry Oil Heaters, the only fuels allowed to be fired are natural gas or propane.
- c. For the Blizzard Beach and North Service Area Laundry boilers, the only fuel allowed to be fired is natural gas.
- d. For the Reedy Creek Energy Services Compost Facility solid waste dryer, the only fuel allowed to be fired is propane.
- e. For the Ft. Wilderness Lodge and Construction Landfill diesel electric generators, the only fuel allowed to be fired is new No. 2 distillate fuel oil.

[AC48-149215; AC48-151515; AC48-156350; AC48-243687; AC48-236247; AC48-264605; AC48-268376; AC48-271849; 0950111-011-AC; and, Rules 62-296.406(2) & (3), F.A.C.]

### B.4. Hours of Operation.

- a. Unless stated, the emissions units may operate continuously, i.e., 8760 hours/year.
- b. For the Grand Floridian Hotel diesel electric generator, the maximum hours of operation are 312 hrs/yr.

[AC48-149215; AC48-151515; AC48-156350; AC48-236247; AC48-243687; AC48-264605; AC48-268376; AC48-271849; 0950111-011-AC; and, Rule 62-210.200(PTE), F.A.C.]

#### **Emission Limitations and Standards**

### B.5. Visible Emissions.

a. Visible emissions from each Blizzard Beach and Boardwalk boiler shall not exceed 20 percent opacity, except for one 2-minute period per hour during which opacity shall not exceed 40 percent.

**DRAFT Permit No.:** 0950111-005-AV

- b. Visible emissions from each Animal Kingdom boiler shall not exceed 20 percent opacity, except for one 6-minute period per hour during which opacity shall not exceed 27 percent.
- c. Visible emissions from the diesel electric generators, hot water generators, laundry oil heaters and solid waste dryer, shall be less than 20 percent opacity.
- d. Visible emissions from each laundry boiler shall not exceed 5% opacity. [AC48-149215; AC48-151515; AC48-156350; AC48-236247; AC48-243687; AC48-268376; AC48-264605; 0950111-011-AC; and, Rules 62-296.406(1) and 62-296.320(4)(b)1., F.A.C.]
- B.6. <u>Particulate Matter and Sulfur Dioxide</u>. From the steam boilers, particulate matter and sulfur dioxide emissions shall be controlled by the firing of natural gas or propane. [AC48-156350; AC48-264605; 0950111-011-AC; and, Rule 62-296.406(2) & (3), F.A.C.]

#### **Excess Emissions**

- B.7. 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.]
- B.8. 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.]

#### Monitoring of Operations

#### B.9. Determination of Process Variables.

- (a) <u>Required Equipment</u>. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

## Test Methods and Procedures

### B.10. Visible emissions.

a. Unless stated and for the boilers, the test method for visible emissions shall be DEP Method

**DRAFT Permit No.:** 0950111-005-AV

- 9, incorporated in Chapter 62-297, F.A.C. See specific conditions **B.11.** and **B.13**.
- b. For the diesel electric generators, hot water generators, laundry boilers, laundry oil heaters and the solid waste dryer, the test method shall be EPA Method 9, in accordance with Chapter 62-297, F.A.C.
- c. The visible emissions shall be conducted for 60-minutes for each boiler.
- d. The visible emissions shall be conducted for 30-minutes for the diesel electric generators, hot water generators, laundry oil heaters, and the solid waste dryer.

[AC48-149215; AC48-151515; AC48-156350; AC48-236247; AC48-243687; AC48-264605; AC48-268376; 0950111-011-AC; and, Rules 62-213.440, 62-296.320(4)(b)4., and 62-297.401, F.A.C.]

- B.11. <u>DEP Method 9</u>. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:
  - 1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
  - 2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
    - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
    - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

B.12. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted. capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

**DRAFT Permit No.:** 0950111-005-AV

[Rules 62-297.310(2) & (2)(b), F.A.C.]

### B.13. Applicable Test Procedures.

- (a) Required Sampling Time.
  - 2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
    - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

- B.14. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
- (a) General Compliance Testing.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - a. Did not operate; or
    - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

> 4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

**DRAFT Permit No.:** 0950111-005-AV

- a. Visible emissions, if there is an applicable standard;
- 9. The owner or operator shall notify the Department, 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.
- (b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply. [Rule 62-297.310(7), F.A.C.; and, SIP approved]
- B.15. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
  - a. only gaseous fuel(s); or
  - b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
  - c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

## Record keeping and Reporting Requirements

B.16. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

## B.17. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department 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), F.A.C.]

B.18. For each emissions unit, the permittee shall maintain a monthly log of the hours operated and the amount of fuel fired.

**DRAFT Permit No.:** 0950111-005-AV

[Rules 62-4.070 and 62-213.440, F.A.C.; AC48-149215; AC48-151515; AC48-156350; AC48-236247; AC48-243687; AC48-264605; AC48-268376; AC48-271849; and, 0950111-011-AC]

B.19. The type of fuel and the heat input to each emissions unit shall be included on the visible emissions test report.

[Rule 62-213.440, F.A.C.; AC48-149215; AC48-151515; AC48-156350; AC48-236247; AC48-243687; AC48-264605; AC48-268376; AC48-271849; and, 0950111-011-AC]

B.20. The owner or operator of each affected emissions unit (laundry boilers) shall record and maintain records of the amounts of natural gas combusted during each day. The records shall be retained for a period of at least five years following the date of such record.

[40 CFR 60.48c(g) & (h); and, Rule 62-213.440, F.A.C.]

#### Miscellaneous

B.21. Each emissions unit shall be tested for visible emissions within 30 days after being placed in operation. The tests shall last 60-minutes for each boiler and 30-minutes for the hot water generators and solid waste dryer.

[Rule 62-213.440, F.A.C.; AC48-149215; AC48-151515; AC48-236247; AC48-264605; AC48-268376; AC48-271849; and, 0950111-011-AC]

## Section III. Emissions Units.

### Subsection C. This section addresses the following emissions units.

E.U./Facility I.D.	Brief Description	<u>Manufacturer</u>	<u>Model</u>
` '	Diesel Electric Generator #1 (2.5 MW) Diesel Electric Generator #2 (2.5 MW)	Stewart & Stevenson Stewart & Stevenson	S-20-645-E4B S-20-645-E4B

DRAFT Permit No.: 0950111-005-AV

These emissions units are identical 3,600 horsepower large bore diesel engines, equipped with a 2.5 megawatt generator, Model TBGZHJ. Each generator provides peak demand reduction and emergency standby power. Each emissions unit is permitted to fire new No. 2 distillate fuel oil only.

[Permitting notes: The diesel electric generators were issued permits pursuant to Rule 62-210.300, Permits Required.}

The following specific conditions apply to the emissions units listed above:

#### Essential Potential to Emit (PTE) Parameters

C.1. <u>Permitted Capacity</u>. The maximum operation rates are as follows:

E.U./Facility I.D.	Brief Description	Permitted Capacity megawatts/hr
EPCOT Central Energy Plant -079 (EPCOT DG-1)	Diesel Electric Generator #1 (2.5 MW)	2.5
-080 (EPCOT DG-2)	Diesel Electric Generator #2 (2.5 MW)	2.5

[AC48-105243 and AC48-106650; and, Rule 62-210.200(PTE), F.A.C.]

- C.2. <u>Emissions Unit Operating Rate Limitation After Testing</u>. See specific condition **C.18**. [Rule 62-297.310(2), F.A.C.]
- C.3. <u>Methods of Operation Fuels</u>. The only fuel allowed to be fired is new No. 2 distillate fuel oil.

[AC48-105243 and AC48-106650; and, Rule 62-213.410, F.A.C.]

C.4. <u>Hours of Operation</u>. Each emissions unit is allowed to operate 1900 hrs/yr. [AC48-105243 and AC48-106650; and, Rule 62-210.200(PTE), F.A.C.]

### **DRAFT Permit No.:** 0950111-005-AV

#### **Emission Limitations and Standards**

- C.5. <u>Visible E</u>missions.
- a. Visible emissions from the diesel electric generators shall be less than 20 percent opacity. [AC48-105243 and AC48-106650; and, Rule 62-296.320(4)(b)1., F.A.C.]
- C.6. The emissions from each diesel electric generator shall not exceed the following:

Pollutant	Allowables lbs/hr	Allowables TPY
Particulate Matter	10.0	9.5
Sulfur Dioxide	14.5	14.0
Nitrogen Oxides	126.0	126.0
Carbon Monoxide	1.5	2.8
Volatile Organic Compounds	2.1	2.0

[AC48-105243 and AC48-106650]

C.7. <u>Sulfur Dioxide - Sulfur Content</u>. The sulfur content of the new No. 2 distillate fuel oil shall not exceed 0.5%, by weight. Firing low sulfur fuel oil negates the need to conduct any SO<sub>2</sub> mass tests. See specific conditions **C.11**. and **C.15**. [AC48-105243 and AC48-106650]

#### **Excess Emissions**

- C.8. 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.]
- C.9. 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.]

## **Monitoring of Operations**

- C.10. <u>Determination of Process Variables</u>.
- (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

**DRAFT Permit No.:** 0950111-005-AV

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

C.11. Monitoring - Fuel Oil. The fuel oil shall be analyzed each time fuel oil is transferred to the storage tank. In lieu of conducting sampling and analysis at the time of each delivery of new fuel oil, the permittee can accept a fuel oil analysis from the vendor upon each delivery and the records shall be retained for a minimum of 5 years. See specific conditions C.7. and C.15. [Rule 62-213.440, F.A.C.; AC48-105243 and AC48-106650]

#### **Test Methods and Procedures**

- C.12. Visible emissions.
- a. For the diesel electric generators, the test method shall be EPA Method 9 in accordance with Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4. and 62-297.401, F.A.C.; and, AC48-105243 and AC48-106650]

- C.13. <u>Particulate Matter</u>. EPA Method 5 shall be used to demonstrate compliance with particulate matter emissions limit in accordance with Chapter 62-297, F.A.C., if the visible emissions are equal to or greater than 20% opacity. If a test is required, then a visible emissions test shall be conducted concurrently with each particulate matter emissions test. [Rule 62-297.401, F.A.C.; and, AC48-105243 and AC48-106650]
- C.14. Nitrogen Oxides (NO<sub>X</sub>). Annually, EPA Method 20 shall be used to demonstrate compliance with the NO<sub>X</sub> emissions limit in accordance with Chapter 62-297, F.A.C. A visible emissions test shall be conducted concurrently with each NO<sub>X</sub> emissions test. [Rule 62-297.401, F.A.C.; and, AC48-105243 and AC48-106650]
- C.15. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition. See specific conditions C.7. and C.11. [Rules 62-213.440 and 62-297.440, F.A.C.]

C.16. <u>Carbon Monoxide</u>. The firing of low sulfur fuel oil and proper operation of the emissions units negates the need to conduct a mass emissions test for carbon monoxide. [Rule 62-297.310(7), F.A.C.; and, AC48-105243 and AC48-106650]

DRAFT Permit No.: 0950111-005-AV

C.17. <u>Volatile Organic Compounds</u>. The firing of low sulfur fuel oil and proper operation of the emissions units negates the need to conduct a mass emissions test for volatile organic compounds.

[Rule 62-297.310(7), F.A.C.; and, AC48-105243 and AC48-106650]

- C.18. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

  [Rules 62-297.310(2) & (2)(b), F.A.C.]
- C.19. <u>Calculation of Emission Rate</u>. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

#### C.20. Applicable Test Procedures.

- (a) Required Sampling Time.
  - 1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
  - 2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
    - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) <u>Calibration of Sampling Equipment</u>. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

**DRAFT Permit No.:** 0950111-005-AV

- (e) <u>Allowed Modification to EPA Method 5</u>. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]
- C.21. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

  [Rule 62-297.310(6), F.A.C.]
- C.22. <u>Frequency of Compliance Tests</u>. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required. (a) General Compliance Testing.
  - 2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - a. Did not operate; or
    - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
  - 4. During each federal fiscal year (October 1 September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
    - a. Visible emissions, if there is an applicable standard;
    - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
    - c. Each NESHAP pollutant, if there is an applicable emission standard.
  - 5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.
  - 9. The owner or operator shall notify the Department, 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.

(b) <u>Special Compliance Tests</u>. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

**DRAFT Permit No.:** 0950111-005-AV

- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply. [Rule 62-297.310(7), F.A.C.; and, SIP approved]
- C.23. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

#### Record keeping and Reporting Requirements

C.24. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

#### C.25. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department 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), F.A.C.]
- C.26. For each emissions unit, the permittee shall maintain a log of the hours operated and the amount of fuel fired.

[Rules 62-4.070 and 62-213.440, F.A.C.]

C.27. The type of fuel and the heat input to each emissions unit shall be included on the visible emissions test report.

[Rule 62-213.440, F.A.C.; and, AC48-105243 and AC48-106650]

### Section III. Emissions Units.

Subsection D. This section addresses the following emissions units.

E.U./Facility I.D.	Brief Description	Model	
North Service Area			
-007 (NSA-1)	NSA Paint Spray Booth (PSB) #1	unknowń	
-008 (NSA-2)	NSA PSB #2	unknown	
-009 (NSA-3)	NSA PSB #3	unknown 8	
-010 (NSA-5)	NSA Staff Shop PSB #1	unknown	
-011 (NSA-6)	NSA Staff Shop PSB #2	unknown	
-012 (NSA-7)	NSA Water Wash Plastisol PSB #1; includes a natural gas fired curing oven	unknown	į

**DRAFT Permit No.:** 0950111-005-AV

Note: All of the paint spray booths are equipped with paint arrestor type filters to control particulate matter and visible emissions.

The NSA PSB #1 will be used to coat a variety of objects including vehicles, wooden furniture, trash cans, ride components, posts and frames using two part polyurethane, two part acrylic, two part epoxy primers, and other primer coatings. The PSB will be equipped with two Binks Model 30-4313 exhaust fans and Binks Model 29-893 paint arrestor type filters. [AC48-75833; and, AC48-108740]

The NSA PSBs #2 & #3 will be used to coat a variety of objects including vehicles, wooden furniture, trash cans, ride components, posts and frames using two part polyurethane, two part acrylic, two part epoxy primers, and other primer coatings. The PSB will be equipped with two Binks Model 30-4418 exhaust fans and Binks Model 29-893 paint arrestor type filters. [AC48-75834 & AC48-75835; and, AC48-108741 & AC48-108742]

The NSA Staff Shop PSB #1 will be used to spray polyester resin, lacquer based coatings and polyvinyl alcohol on fiberglass objects and molds. The PSB will be a Binks Model PPF with Model 30-800 fans. The particulate matter filters will have an efficiency of 80% for lacquers and 95% for two part high particulate coating systems. [AC48-75836; and, AC48-108743]

The NSA Staff Shop PSB #2 will be used to spray polyester resin, lacquer based coatings and polyvinyl alcohol on fiberglass objects and molds. The PSB will be equipped with a New York Model 548-1 blower and Particulate matter filters with an efficiency of 80% for lacquers and 95% for two part high particulate coating systems. [AC48-75837; and, AC48-108744]

The NSA Water Wash Plastisol PSB #1 will consist of a spray booth and a curing oven. The PSB will be used to spray solvated vinyl plastisol on fiberglass objects and molds. The PSB will be equipped with a fan and a no pump dyna-precipitator water wash filtering system. The curing oven will be equipped with a fan and be fired by natural gas with an exit temperature of 350°F. [AC48-75838; and, AC48-108745]

**DRAFT Permit No.:** 0950111-005-AV

{Permitting note(s): The paint spray booths are regulated under Rule 62-296.320(1), F.A.C., General Pollutant Emission Limiting Standards, Volatile Organic Compounds (VOC) or Organic Solvent Emissions.}

The following specific conditions apply to the emissions units listed above:

#### **Essential Potential to Emit (PTE) Parameters**

D.1. The maximum hours of operation are as follows:

E.U./Facility I.D.	Allowable hours/year
North Service Area	
-007 (NSA-1)	4160
-008 (NSA-2)	4160
-009 (NSA-3)	4160
-010 (NSA-5)	2080
-011 (NSA-6)	2080
-012 (NSA-7)	2080

[AC48-108740 - 45; Rules 62-4.070 and 62-210.200(PTE), F.A.C.]

D.2. Methods of Operation - Fuel. The curing oven associated with the NSA Water Wash Plastisol PSB #1 is allowed to fire natural gas only. [AC48-108745; and, Rule 62-213.410, F.A.C.]

### **Emission Limitations and Standards**

D.3. The maximum allowable emissions limitations are as follows:

E.U./Facility I.D.	Visible Emissions	Particulate Matter	Volatile Organic Compounds
	Opacity %	lbs/hr TPY	lbs/hr TPY
North Service Area			
-007 (NSA-1)	5	0.125 or 0.19	0.89 or 2.82
-008 (NSA-2)	5	0.250 or 0.38	1.77 or 5.65
-009 (NSA-3)	5	0.250 or 0.38	3.54 or 5.65
-010 (NSA-5)	5	0.02 or 0.02	0.08 or 0.08
-011 (NSA-6)	5	0.04 or 0.16	0.61 or 0.63
-012 (NSA-7)	5	0.07 or 0.08	0.49 or 0.53

[AC48-108740 - 45]

D.4. For the curing oven, the stack temperature shall not exceed 350°F. [AC48-108745]

#### **Test Methods and Procedures**

D.5. <u>Visible emissions</u>. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. See specific condition **D.6**. [Rules 62-213.440 and 62-297.401, F.A.C.; and, AC48-108740 - 45]

- D.6. <u>DEP Method 9</u>. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:
  - 1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

**DRAFT Permit No.:** 0950111-005-AV

- 2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.; and, AC48-108740 - 45]

D.7. <u>Volatile Organic Compounds (VOCs)</u>. The VOC content of all coatings and solvents used in each spray booth, demonstrated by manufacturer's specification or EPA Method 24, shall be submitted to the Department.

[Rule 62-297.401, F.A.C.; and, AC48-108740 - 45]

### D.8. Operating Rate During Testing.

a. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

**DRAFT Permit No.:** 0950111-005-AV

b. Since there is not a permitted capacity for these emissions units, then in the case of the PSBs and associated activities, the operating rate during testing means that an emissions unit is actually operating.

[Rules 62-297.310(2) & (2)(b) and 62-4.070, F.A.C.]

## D.9. Applicable Test Procedures.

### (a) Required Sampling Time.

- 2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
  - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

- D.10. <u>Frequency of Compliance Tests</u>. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
- (a) General Compliance Testing.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - a. Did not operate;
  - 4. During each federal fiscal year (October 1 September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
    - a. Visible emissions, if there is an applicable standard;

9. The owner or operator shall notify the Department, 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.

DRAFT Permit No.: 0950111-005-AV

- (b) <u>Special Compliance Tests</u>. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply. [Rule 62-297.310(7), F.A.C.; and, SIP approved]
- D.11. By this permit, annual emissions compliance testing for visible emissions is not required for any emissions unit while burning only gaseous fuel(s). [Rule 62-297.310(7)(a)4., F.A.C.]

#### Record keeping and Reporting Requirements

## D.12. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department 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), F.A.C.]
- D.13. For each emissions unit, the permittee shall maintain a daily log of the hours operated and the amount of coatings and solvents used and the results submitted to the Department quarterly. [Rule 62-213.440, F.A.C.; and, AC48-108740 45]

Section III. Emissions Unit(s) and Conditions.

# Subsection E. This section addresses the following emissions units.

E.U./Facility I.D.	Brief Description	Model
North Service Area		٠
-013 (NSA-4)	NSA Metalizing PSB	Binks: WE-20-7-T
-014 (NSA-8)	NSA Lofting Building PSB	Binks: PFA-20-12-T-LH
-015 (NSA-9)	NSA Paint Shop PSB #4	Binks: PFF-16-10-T-LH
-016 (NSA-10)	NSA Paint Shop PSB #5	Binks: PFF-16-10-T-LH
-017 (NSA-11)	NSA Character Head Spray Box	Binks: PFA-6-8-T-LH
-019 (NSA-12)	NSA Artist's Preparation Shop PSB	Binks: PFF-5-8-T-LH
-025 (NSA-14)	NSA Central Shop Paint Mixing Stations (7)	Fellon-Pinchon: 23-39-00
-027 (NSA-15)	NSA Paint Shop PSB #6	DB-1210-S
Disney-MGM Studio Tours		
-061 (MGM-10)	Studio Craft PSB	Binks: PFF-8-7-T-LH
Buena Vista Construction		
-062 (BVC-1)	PSB	DeVilbiss: DF
Lake Buena Vista Community		
<u>Village</u>		
-063 (LBV-1)	PSB #1	DeVilbiss: LF-519
-064 (LBV-2)	PSB #2	Binks: SSF-6-3-1
Disney Village		<u> </u>
-065 (VM-3)	Marketplace PSB	
Ft. Wilderness/Golf Course		<del></del>
-066 (FWR-4)	PSB	Binks: SSF-510-30-50-TRB
Disnev's Yacht & Beach Club		<del></del>
-067 (YBC-3)	PSB	Binks: PFF-10-8-T-LH
EPCOT Center	<u> </u>	
-068 (EP-1)	Maintenance PSB	Binks: SSF-531
-069 (EP-2)	Display PSB	Binks: PBF-6-T
-070 (EP-3)	Marina PSB	
South Service Area		
-071 (SSA-1)	Traffic Control Equipment PSB	JBI Dry Filter: 8049-EK
Magic Kingdom		
-075 (MK-1) -093 (MK-2)	PSB #1 PSB #2	Binks: PFA-6-8-T-LH J.B.I.: IDB-148-S

**DRAFT Permit No.:** 0950111-005-AV

E.U./Facility I.D.	Brief Description	Model
Boardwalk Resort -094 (BR-1)	PSB #1	IDB-108PSB-5
Coronado Springs Resort -102 (CSR-1)	PSB #1	Binks: PFF-12-8-T-LH
All Star Resort -xxx (ASR-1)	PSB #1	Binks: PFF-12-8-T-LH

Note: All of the paint spray booths are equipped with paint arrestor type filters to control particulate matter and visible emissions; and, they are capable of removing more than 95% of particulate matter less than 1 micron.

The paint spray booths and associated activities will be used to coat a variety of objects for fabrication and maintenance.

{Permitting note(s): The paint spray booths are regulated under Rule 62-296.320(1), F.A.C., General Pollutant Emission Limiting Standards, Volatile Organic Compounds (VOC) or Organic Solvent Emissions.}

The following specific conditions apply to the emissions units listed above:

## **Essential Potential to Emit (PTE) Parameters**

E.1. The maximum hours of operation are as follows:

E.U./Facility I.D.	Allowable hours/year
North Service Area	
-013 (NSA-4)	4160
-014 (NSA-8)	4160
-015 (NSA-9)	4160
-016 (NSA-10)	4160
-017 (NSA-11)	4160
-019 (NSA-12)	4160
-025 (NSA-14)	2496
-027 (NSA-15)	4160
Disney-MGM Studio Tours	_
-061 (MGM-10)	4160
Buena Vista Construction	
-062 (BVC-1)	4160

E.U./Facility I.D.	Allowable hours/vear
I I O	
Lake Buena Vista Community	
Village	41.60
-063 (LBV-1)	4160
-064 (LBV-2)	4160
Disney Village	
-065 (VM-3)	5840
Ft. Wilderness/Golf Course	
-066 (FWR-4)	4160
Disnev's Yacht & Beach Club	
-067 (YBC-3)	4160
EPCOT Center	
-068 (EP-1)	4160
-069 (EP-2)	4160
-070 (EP-3)	3120
South Service Area	
-071 (SSA-1)	2080
Magic Kingdom	
-075 (MK-1)	4160
-093 (MK-2)	8760
Boardwalk Resort	
-094 (BR-1)	8760
Coronado Springs Resort	
-102 ( <i>CSR</i> -1)	5840
All Star Resort	
-xxx ( <i>ASR</i> -1)	4160

[Rule 62-210.200(PTE), F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; 0950111-003-AC; 0950111-008-AC; AO48-183381; and, AO48-254323]

**DRAFT Permit No.:** 0950111-005-AV

## **DRAFT Permit No.:** 0950111-005-AV

## **Emission Limitations and Standards**

# E.2. The maximum allowable emissions and/or usage limitations are as follows:

E.U./Facility I.D.	<u>VE</u> Opacity %	VOC	<u>PM</u>
North Service Area	- P	<u>TPY</u>	
-013 (NSA-4)	<20	2.54	not applicable (NA)
-014 (NSA-8)	<20	15.0	NA
-015 (NSA-9)	<20	2.19	NA NA
-016 (NSA-10)	<20	2.19	NA NA
-017 (NSA-11)	<20	0.94	NA NA
-017 (NSA-11) -019 (NSA-12)	<20	1.02	NA
-025 (NSA-14)	5	2.2	NA NA
-023 (NSA-14)	3	Per Station	NA NA
		lb/hr TPY	NA
-027 (NSA-15)	5	$\frac{10/11}{0.13}  \frac{111}{0.17}$	NA
Di MOMA II M			
Disney-MGM Studio Tours	-00	TPY	N.T. 4
-061 (MGM-10)	<20	1.01	NA
Buena Vista Construction		<u>TPY</u>	
-062 (BVC-1)	<20	7.73	NA
Lake Buena Vista Community		<u> </u>	
<u>Village</u>		<u>TPY</u>	
-063 (LBV-1)	<20	14.8	NA
-064 (LBV-2)	<20	10.5	NA '
Disnev Village		Usage Rate	
-065 (VM-3)	<20	1 gal/hr paint or primer	NA
Ft. Wilderness/Golf Course		lbs/hr TPY	lb/hr TPY
-066 (FWR-4)	<20	2.10 1.45 1	0.17 0.12
Disnev's Yacht & Beach Club		lbs/hr TPY	lb/hr TPY
-067 (YBC-3)	5	6.0 12.3	0.10 0.35
EPCOT Center		<u>TPY</u>	
-068 (EP-1)	<20	11.4	NA
-069 (EP-2)	<20	0.06	NA
-070 (EP-3)	<20	lbs/mth TPY	lb/hr lbs/mth TPY
		166.0 0.93	0.05 14.0 0.08
		Usage Rate <sup>2</sup>	
		30 gals/mth; 300 gals/yr	
South Service Area		Usage Rate	
-071 (SSA-1)	<20	<2.5 lbs/hr total of Delstar	NA
` '	-	enamel and/or Xymax 66	
		polyurethane	
		£ 2.2	

E.U./Facility I.D.

Magic Kingdom -075 (MK-1)

Boardwalk Resort -094 (BR-1)

Coronado Springs Resort

-093 (MK-2)

-102 (CSR-1)

All Star Resort

-xxx (ASR-1)

<u>voc</u>	<u>PM</u>
TPY	
0.52	NA
12-mth rolling avg	NA
2.3 tons	
730 gals of coatings	•
12-mth rolling avg	₹-

3.1 tons
730 gals of coatings

12-mth rolling avg

3.7 tons VOC

3.7 tons single HAPs <sup>3</sup> 3.7 tons total HAPs <sup>3</sup> 1500 gals of coatings

Usage Rate

gals/hr of paint or primer

NA

NA

NA

NA

DRAFT Permit No.: 0950111-005-AV

[	AC48-151472; AC48-151504; AC48-151507; AC48-151509; AC48-151510; AC48-156346;
ŀ	AC48-166499; AC48-179648; AC48-179649; AC48-243981; 0950111-003-AC; 0950111-008-
į	AC: AO48-183381: AO48-254323: and Rule 62-296 320(4)(b)1 FAC1

VE Opacity %

<20

<20

<20

<20

<20

E.3. For emissions units NSA-4, -8 thru -12, MGM-10, BVC-1, LBV-1 & -2, VM-3, EP-1 thru -3, SSA-1, MK-1, and All Star Resort PSB #1, the air velocity at the PSB filter face shall not exceed 250 ft/min.

[AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-166499; AC48-205018; AC48-243981; and, AO48-254323]

#### **Monitoring of Operations**

E.4. For the emissions units MGM-10, BVC-1, LBV-1 & -2, VM-3, EP-1 thru -3, SSA-1, MK-1, and All Star Resort PSB #1, each PSB and its dry filter must be properly operated and maintained.

[AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-166499; AC48-205018; AC48-243981; and, AO48-254323]

<sup>&</sup>lt;sup>1</sup> The annual emissions account for intermittent spraying of paint, while the hourly emissions are based on continuous spraying.

<sup>&</sup>lt;sup>2</sup> The values are a maximum aggregate total material utilization rate of paint, thinners, and clean-up solvents. The monthly emission limit shall be demonstrated using a monthly material inventory data, while compliance with the annual emission limit shall be demonstrated using a 12-month rolling average, based on the inventory basis.

<sup>&</sup>lt;sup>3</sup> Not federally enforceable.

### **Test Methods and Procedures**

E.5. <u>Visible emissions</u>. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. See specific condition **E.6**. [Rules 62-213.440, 62-296.320(4)(b)4., and 62-297.401, F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; AO48-183381; and, AO48-254323]

**DRAFT Permit No.:** 0950111-005-AV

- E.6. <u>DEP Method 9</u>. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:
  - 1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
  - 2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
    - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
    - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; AO48-183381; and, AO48-254323]

E.7. <u>Particulate Matter</u>. Due to the nature of the emissions (over coating spray), the low potential emissions (both particulate matter and visible emissions), and the control systems (paint arrestor filters) associated with the PSB, no particulate matter emissions test is required for compliance demonstration and unless the visible emissions standard is violated. [Rule 62-297.310(7), F.A.C.]

E.8. Volatile Organic Compounds (VOCs). The VOC content of all coatings and solvents used in each spray booth shall be demonstrated by manufacturer's specification and material balance or EPA Method 24, and made available to the Department upon request. [Rules 62-213.440 and 62-297.401, F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; 0950111-003-AC; 0950111-008-AC; and, AO48-2543231

DRAFT Permit No.: 0950111-005-AV

## E.9. Operating Rate During Testing.

- a. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
- b. Since there is not a permitted capacity for these emissions units, then in the case of the PSBs and associated activities, the operating rate during testing means that an emissions unit is actually operating.

[Rules 62-297.310(2) & (2)(b) and 62-4.070, F.A.C.]

#### E.10. Applicable Test Procedures.

## (a) Required Sampling Time.

- 2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
  - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

- E.11. <u>Frequency of Compliance Tests</u>. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
- (a) General Compliance Testing.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not

require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

DRAFT Permit No.: 0950111-005-AV

- a. Did not operate;
- 4. During each federal fiscal year (October 1 September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
  - a. Visible emissions, if there is an applicable standard;
- 9. The owner or operator shall notify the Department, 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.
- (b) <u>Special Compliance Tests</u>. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
- (c) <u>Waiver of Compliance Test Requirements</u>. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply. [Rule 62-297.310(7), F.A.C.; and, SIP approved]

#### Record keeping and Reporting Requirements

#### E.12. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department 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), F.A.C.]
- E.13. For each emissions unit, the permittee shall maintain a daily log of the hours operated and the amount of coatings and solvents used and the results submitted to the Department quarterly. [Rule 62-213.440, F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-501509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; 0950111-003-AC; 0950111-008-AC; AO48-183381; AO48-254323]

E.14. <u>General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.</u> The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Reasonable precautions to minimize VOC/OS emissions are:

**DRAFT Permit No.:** 0950111-005-AV

- a. Cover tightly or close all VOC/OS containers when they are not in use;
- b. Cover tightly, where possible, all open troughs, basins, baths, tanks, etc., when they are not in use;
- c. Maintain all piping, valves, fittings, etc., in good operating condition;
- d. Prevent excessive air turbulence across exposed VOC/OS;
- e. Immediately confine and clean up VOC/OS spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal; and,
- f. Maintain a monthly accounting of each VOC/OS used based on beginning and ending inventories, deliveries, and shipments off-property (recycling or disposal).
- g. **Not federally enforceable**. Also, for the Coronado Springs Resort PSB #1, maintain a monthly accounting of each HAP (hazardous air pollutant) used based on beginning and ending inventories, deliveries, and shipments off-property (recycling or disposal). [Rule 62-296.320(1)(a), F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; 0950111-003-AC; 0950111-008-AC; AO48-183381; and, AO48-254323]
- E.15. For the Coronado Spring Resort PSB #1, documentation of each chemical reclaimed shall use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied) data sheets, EPA Method 24, 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. [Rules 62-213.440 and 62-297.401, F.A.C.; and, 0950111-008-AC]
- E.16. For the Coronado Spring Resort PSB #1, volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Method 24, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". [Rules 62-213.440 and 62-297.401, F.A.C.; and, 0950111-008-AC]

#### Miscellaneous

E.17. For emissions units NSA-4, -8 thru -12, MGM-10, BVC-1, LBV-1 & -2, and EP-1 & EP-2, toluene emissions from their building should not cause ambient air concentrations to exceed the Acceptable Ambient Concentration (AAC) at ground level of 3.75 milligrams/m<sup>3</sup>, based on 80 hrs/wk of operation.

[AC48-151472; AC48-151504; AC48-151507; AC48-151509; and, AC48-151510]

E.18. For emissions unit VM-3, methyl ethyl ketone emissions from its building should not cause the 24-hour average ground level ambient air concentrations to exceed the No Threat Level (NTL) of 1416 micrograms/m<sup>3</sup>. [AC48-243981]

**DRAFT Permit No.:** 0950111-005-AV

- E.19. For emissions units BVC-1 and LBV-1 & -2, , hexamethylene diisocyanate emissions from their building should not cause the ambient air concentrations to exceed the AAC at ground level of 0.15 milligrams/m<sup>3</sup>, based on 80 hrs/wk of operation.

  [AC48-151509; and, AC48-151510]
- E.20. For emissions unit SSA-1, butyl acetate emissions from its building shall not cause the 8-hour average ground level ambient air concentrations to exceed the NTL of 1700 micrograms/m<sup>3</sup>. [AC48-205018]
- E.21. For emissions units MK-2, BR-1 and Coronado Spring Resort PSB #1, toluene emissions from their building shall not cause the 24-hour average ground level ambient air concentrations to exceed 448 micrograms/m<sup>3</sup>.\* Proof of compliance with this condition shall be demonstrated by the Professional Engineer's calculations if any of the conditions used in the calculations in the construction application have changed.

  [0950111-003-AC; and, 0950111-008-AC]
- E.22. For emissions units NSA-27 and YBC-3, unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant (as listed in the MSDS submitted with the application) shall not exceed the concentration calculated by the following formula:

AAC = OEL/Safety Factor

Where,

AAC = Ambient Air Concentration.

Safety Factor = 50 for category B substances and 8 hrs/day

100 for category A substances and 8 hrs/day

210 for category B substances and 24 hrs/day

420 for category A substances and 24 hrs/day

OEL = Occupational Exposure Level such as ACGIH, OSHA and NIOSH published standards for toxic materials.

[AC48-179648; and, AC48-179649]

E.23. For emissions units NSA-27 and YBC-3, compliance with the AAC shall be demonstrated based on calculations certified by a Professional Engineer registered in Florida using actual operating conditions. Determination of the ambient concentration for organic compounds shall be determined by Department approved dispersion modeling or the Dilution Factor Matrix calculations.

[AC48-179648; and, AC48-179649]

E.24. For emissions units MK-2 and BR-1, the permittee may use different hazardous air pollutant (HAP) containing materials than those stated in the application. However, no less than 14-days before using a different material which produces HAP emissions, the permittee shall provide the MSDS of the new materials and reasonable assurances from a Professional Engineer registered in Florida that the Florida Ambient Reference Concentration will not be exceeded because of the change of materials or because of an increase in the use of HAP containing materials. The written notification will become a part of the permit. [0950111-003-AC]

**DRAFT Permit No.:** 0950111-005-AV

## Section III. Emissions Unit(s) and Conditions.

## Subsection F. This section addresses the following emissions unit.

E.U./Facility I.D.	Brief Description	<u>Manufacturer</u>
North Service Area Dry Cleaning Plant		
-001 (LDC-1)	Dry Cleaning Unit #1	Multimatic Machine
-002 (LDC-2)	Dry Cleaning Unit #2	Multimatic Machine
-003 (LDC-3)	Dry Cleaning Unit #3	Multimatic Machine
-004 (LDC-4)	Dry Cleaning Unit #4	Multimatic Machine

**DRAFT Permit No.:** 0950111-005-AV

The four perchloroethylene dry cleaning units are all vented to a single exhaust stack with precleaning provided by a new chiller system followed by and in series with an existing carbon absorption system (Spencer dual bed: Model 1500, Serial #190 @ ~99% efficient). The permittee recently upgraded the existing control system by installing a chiller system, which reduced the potential perc emissions (1.5 TPY to 0.5 TPY) and load on the existing carbon absorption system, and is being addressed in an air construction permitting action (0950111-012-AC).

{Permitting note(s): The perchloroethylene dry cleaning operation is subject to 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.}

#### The following specific conditions apply to the emissions units listed above:

#### General

- F.1. The Department's Central District office is addressing the entire operation and its applicable requirements in a current permitting action, No. 0950111-012-AC. Also, this document will undergo Florida's SIP process for establishing federally enforceable conditions in construction permits and, if issued before the PROPOSED Title V permit is issued, then its specific conditions will be incorporated into this permit. If not, then the permit conditions will be incorporated appropriately.
- F.2. The Compliance Plan submitted on October 6, 1997, is incorporated by reference and is attached.

[Rule 62-213.440, F.A.C.]

#### <u>Standards</u>

- F.3. The permittee of each existing dry cleaning system shall comply with either 40 CFR 63.322(a)(1) or (a)(2).
- (1) Route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device.
- (2) Route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a carbon adsorber installed in the dry cleaning machine prior to September 22, 1993

[40 CFR63.322(a)(1) & (2)]

F.4. The permittee shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times. [40 CFR 63.322(c)]

DRAFT Permit No.: 0950111-005-AV

- F.5. The permittee of each dry cleaning system shall operate and maintain the system according to the manufacturers' specifications and recommendations.

  [40 CFR 63.322(d)]
- F.6. Each refrigerated condenser used for the purposes of complying with 40 CFR 63.322(a) or (b) and installed on a dry-to-dry machine, dryer, or reclaimer:
- (1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating;
- (2) Shall be monitored according to 40 CFR 63.323(a)(1); and
- (3) Shall be operated with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser. [40 CFR 63.322(e)(1), (2), & (3)]
- F.7. Each refrigerated condenser used for the purpose of complying with 40 CFR 63.322(a) and installed on a washer:
- (1) Shall be operated to not vent the air-perchloroethylene gas-vapor contained within the washer to the atmosphere until the washer door is opened;
- (2) Shall be monitored according to 40 CFR 63.323(a)(2). [40 CFR 63.322(f)(1) & (2)]
- F.8. Each carbon adsorber used for the purposes of complying with 40 CFR 63.322(a) or (b):
- (1) Shall not be bypassed to vent or release any air-perchloroethylene gas-vapor stream to the atmosphere at any time; and
- (2) Shall be monitored according to the applicable requirements in 40 CFR 63.323(b) or (c). [40 CFR 63-322(g)(1) & (2)]
- F.9. (j) The permittee of an affected facility shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. [40 CFR 63.322(j)]
- F.10. The permittee of a dry cleaning system shall inspect the following components weekly for perceptible leaks while the dry cleaning system is operating:
  - (1) Hose and pipe connections, fittings, couplings, and valves;
  - (2) Door gaskets and seatings;
  - (3) Filter gaskets and seatings;
  - (4) Pumps;
  - (5) Solvent tanks and containers;
  - (6) Water separators;
  - (7) Muck cookers:
  - (8) Stills;

- (9) Exhaust dampers;
- (10) Diverter valves; and
- (11) Cartridge filter housings.

[40 CFR 63.322(k)(1) thru (11)]

F.11. The permittee of a dry cleaning system shall repair all perceptible leaks detected under 40 CFR 63.322(k) within 24 hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a leak. Such repair parts shall be installed within 5 working days after receipt.

[40 CFR 63.322(m)]

**DRAFT Permit No.:** 0950111-005-AV

F.12. If parameter values monitored under 40 CFR 63.322(e), (f), or (g), do not meet the values specified in 40 CFR 63.323(a), (b), or (c), adjustments or repairs shall be made to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for such parts shall be initiated within 2 working days of detecting such a parameter value. Such repair parts shall be installed within 5 working days after receipt. [40 CFR 63.322(n)]

### **Test Methods and Monitoring**

- F.13. When a refrigerated condenser is used to comply with 40 CFR 63.322(a)(1) or (b)(1):
- (1) The permittee shall measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaimer weekly with a temperature sensor to determine if it is equal to or less than  $7.2^{\circ}$  C ( $45^{\circ}$  F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of  $7.2^{\circ}$  C ( $45^{\circ}$  F) to an accuracy of  $\pm 1.1^{\circ}$  C ( $\pm 2^{\circ}$  .F).
- (2) The permittee shall calculate the difference between the temperature of the air-perchloroethylene gas-vapor stream entering the refrigerated condenser on a washer and the temperature of the air-perchloroethylene gas-vapor stream exiting the refrigerated condenser on the washer weekly to determine that the difference is greater than or equal to 11.1° C (20° F)
  - (i) Measurements of the inlet and outlet streams shall be made with a temperature sensor. Each temperature sensor shall be used according to the manufacturer's instructions, and designed to measure at least a temperature range from  $0^{\circ}$  C ( $32^{\circ}$  F) to  $48.9^{\circ}$  C ( $120^{\circ}$  F) to an accuracy of  $\pm 1.1^{\circ}$  C ( $\pm 2^{\circ}$  F).
  - (ii) The difference between the inlet and outlet temperatures shall be calculated weekly from the measured values.

[40 CFR 63-323(a)(1) & (2)]

F.14. When a carbon adsorber is used to comply with 40 CFR 63.322(a)(2) or exhaust is passed through a carbon adsorber immediately upon machine door opening to comply with 40 CFR 63.322(b)(3), the permittee shall measure the concentration of perchloroethylene in the exhaust of the carbon adsorber weekly with a colorimetric detector tube, while the dry cleaning machine is venting to that carbon adsorber at the end of the last dry cleaning cycle prior to desorption of that carbon adsorber to determine that the perchloroethylene concentration in the exhaust is equal to or less than 100 parts per million by volume. The permittee shall:

- (1) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of perchloroethylene in air to an accuracy of  $\pm$  25 parts per million by volume; and
- (2) Use the colorimetric detector tube according to the manufacturer's instructions; and
- (3) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet, or outlet.

**DRAFT Permit No.:** 0950111-005-AV

[40 CFR 63.323(b)(1), (2) & (3)]

- F.15. If the air-perchloroethylene gas-vapor stream is passed through a carbon adsorber prior to machine door opening to comply with § 63.322(b)(3), the permittee of an affected facility shall measure the concentration of perchloroethylene in the dry cleaning machine drum at the end of the dry cleaning cycle weekly with a colorimetric detector tube to determine that the perchloroethylene concentration is equal to or less than 300 parts per million by volume. The permittee shall:
- (1) Use a colorimetric detector tube designed to measure a concentration of 300 parts per million by volume of perchloroethylene in air to an accuracy of  $\pm$  75 parts per million by volume; and
- (2) Use the colorimetric detector tube according to the manufacturer's instructions; and
- (3) Conduct the weekly monitoring by inserting the colorimetric detector tube into the open space above the articles at the rear of the dry cleaning machine drum immediately upon opening the dry cleaning machine door.

[40 CFR 63.323(c)(1), (2) & (3)]

- F.16. When calculating yearly perchloroethylene consumption for the purpose of demonstrating applicability according to 40 CFR 63.320, the permittee shall perform the following calculation on the first day of every month:
- (1) Sum the volume of all perchloroethylene purchases made in each of the previous 12 months, as recorded in the log described in 40 CFRc 3.324(d)(1).
- (2) If no perchloroethylene purchases were made in a given month, then the perchloroethylene consumption for that month is zero gallons.
- (3) The total sum calculated in 40 CFR 63.323(d) is the yearly perchloroethylene consumption at the facility.

[40 CFCR 63.323(d)(1), (2) & (3)]

#### Recordkeeping and Reporting Requirements

- F.17. Each permittee of a dry cleaning facility shall submit an initial report signed by a responsible official before a notary public certifying that the information provided in the initial report is accurate and true to the Permitting authority within 90 calendar days after September 22, 1993, which includes the following:
- (1) The name and address of the permittee;
- (2) The address (that is, physical location) of the dry cleaning facility;
- (3) A brief description of the type of each dry cleaning machine at the dry cleaning facility;

(4) Documentation as described in 40 CFR 63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to § 63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with 40 CFR 63.320; and

**DRAFT Permit No.:** 0950111-005-AV

- (5) A description of the type of control device(s) that will be used to achieve compliance with 40 CFR 63.322(a) or (b) and whether the control device(s) is currently in use or will be purchased.
- (6) Documentation to demonstrate to the Permitting authority's satisfaction that each room enclosure used to meet the requirements of 40 CFR 63.322(a)(3) meets the requirements of 40 CFR 63.322(a)(3)(i) and (ii).

[40 CFR 63-324(a)(1) thru (6)]

- F.18. Each permittee of a dry cleaning facility shall submit a statement signed by a responsible official in the presence of a notary public to the Permitting authority by registered letter on or before the 30th day following the compliance dates specified in 40 CFR 63.320(b) or (c), certifying the following:
- (1) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to 40 CFR 63.323(d);
- (2) Whether or not they are in compliance with each applicable requirement of 40 CFR 63.322; and
- (3) All information contained in the statement is accurate and true. [40 CFR 63.324(b)(1), (2) & (3)]
- F.19. Each permittee of a dry cleaning facility shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of 5 years:
- (1) The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchases; if no perchloroethylene is purchased during a given month then the permittee would enter zero gallons into the log;
- (2) The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month as specified in 40 CFR 63.323(d);
- (3) The dates when the dry cleaning system components are inspected for perceptible leaks, as specified in 40 CFR 63.322(k) or (l), and the name or location of dry cleaning system components where perceptible leaks are detected;
- (4) The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with 40 CFR 63.322(m) and (n);
- (5) The date and temperature sensor monitoring results, as specified in 40 CFR 63.323 if a refrigerated condenser is used to comply with 40 CFR 63.322(a) or (b); and
- (6) The date and colorimetric detector tube monitoring results, as specified in 40 CFR 63.323, if a carbon adsorber is used to comply with 40 CFR 63.322(a)(2) or (b)(3). [40 CFR 63.324(d)(1) thru (6)]
- F.20. Each permittee of a dry cleaning facility shall retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility.

  [40 CFR 63.324(e)]

Walt Disney World Company Walt Disney World Resort Complex Page 62

Section IV. This section is the Acid Rain Part.

Operated by: Walt Disney World Company

ORIS code: 7294: Reedy Creek Combined Cycle

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions unit listed below is regulated under Acid Rain Part, Phase II.

E.U.

## ID No. Description

-088 Combined Cycle Combustion Turbine with a Heat Recovery Steam Generator

A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

**DRAFT Permit No.:** 0950111-005-AV

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95. [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]
- A.2. Sulfur dioxide (SO2) allowance allocations requirements for each Acid Rain unit are as follows:

<u>E.U. ID</u> <u>No.</u>	EPA.1D	Year	2000	2001	. 2002
-088*	32432	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	18* rule**	18* rule**	18* rule**

- \* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.
- \*\* "Rule" denotes that the preceding allocation will be proposed in the upcoming Acid Rain Division rulemaking change. These allowances are unadjusted basis allowances only, unless noted.
- A.3. <u>Emission Allowances</u>. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.
- 1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
- 2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- 3. Allowances shall be accounted for under the Federal Acid Rain Program. [Rule 62-213.440(1)(c), F.A.C.]

Walt Disney World Company Walt Disney World Resort Complex Page 63

A.4. <u>Statement of Compliance</u>. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 51., APPENDIX TV-1, TITLE V CONDITIONS} [Rule 62-214.420(11), F.A.C.]

**DRAFT Permit No.:** 0950111-005-AV

A.5. Comments, notes, and justifications: For Title IV purposes, Mr. Willard K. Smith, Reedy Creek Energy Services, Inc., has become the new Designated Representative, and Mr. Virgil J. Farling, Reedy Creek Energy Services, Inc., has become the new Alternate Designated Representative.

# Appendix E-1, List of Exempt Emissions Units and/or Activities.

**DRAFT Permit No.:** 0950111-005-AV

Walt Disney World Company
Walt Disney World Resort Complex

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., <u>Full Exemptions</u>, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

#### Brief Description of Emissions Units and/or Activities:

- A. Electric drying oven.
- B. Equipment used exclusively to sand and shape wood or plastic.
- C. Laboratory hood vents.
- D. Inorganic substance storage tanks >550 gallons.
- E. Black-start Generator.
- 1. This generator has historically fired a total amount of less than 10,000 gallons per year.

(file name: 0950111e.doc)

# Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Walt Disney World Company
Walt Disney World Resort Complex

**DRAFT Permit No.:** 0950111-005-AV

<u>Unregulated Emissions Units and/or Activities</u>. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

#### Brief Description of Emissions Units and/or Activities:

- I. <u>Commercial/Institutional External Combustion Boilers: Natural gas Fired</u>. These units are used to heat water.
- A. Disney's All-Star Resorts Water Heaters
- 1. ASR-1 thru ASR-6
- B. Disney's Dixie Landings Resort Water Heaters
- 1. DLR-1 thru DLR-25
- C. Disney's Port Orleans Resort Water Heaters
- 1. POR-1 thru POR-16
- D. Disney's Polynesian Resort Water Heaters •
- 1. PR-1 thru PR-4, PR-6 thru PR-9, PR-11 & PR-12
- E. Typhoon Lagoon Water Heaters
- 1. TL-1 thru TL-3
- F. Disney's Wilderness Lodge Water Heaters
- 1. WLR-1 & WLR-2
- G. Disney's Yacht and Beach Club Water Heaters
- 1. YBC-1 & YBC-2
- II. Commercial/Institutional External Combustion Boiler: Natural Gas or Propane Fired (New No. 2 Distillate Fuel Oil for Emergency Use Only @ < 200 hrs/vr/unit). These units are used to heat water.
- A. EPCOT Central Energy Plant

E.U. ID #/Facility ID #	<b>Emissions Unit Description</b>
1078/EPCOT HWG-1	EPCOT Water Heater #1 - West
2077/EPCOT HWG-2	EPCOT Water Heater #2 - Middle
3076/EPCOT HWG-3	EPCOT Water Heater #3 - East

- III. <u>Commercial/Institutional External Combustion Boiler: Natural Gas or New No. 2 Distillate</u> Fuel Oil fired. Thise unit is used to heat water.
- A. North Service Area Central Energy Plant

E.U. ID #/Facility ID #

Emissions Unit Description

1. -081/

Hot Water Generator #3

## Appendix U-1 (cont.)

Page 2 of 2

Walt Disney World Company
Walt Disney World Resort Complex

**DRAFT Permit No.:** 0950111-005-AV

# IV. North Service Area Sand Blast Chamber No. 1 [(-005/(NSA-15)]

This unit operation has a baghouse control system manufactured by Carter-Day, Model 14-RJ-84 to control particulate matter and visible emissions. The collection efficiency is estimated to be 99.7% for particulate matter @ 10 microns in size. The sand blast chamber utilization rate of sand is below 7 lbs/hr.

# V. Miscellaneous

- 1. Degasifiers
- 2. Equipment used exclusively for space heating
- 3. Fireplaces
- 4. Natural gas gate and compression station, including ordorant addition equipment
- 5. Oil and organic solvent storage tanks >550 gallons
- 6. Parts cleaning and degreasing stations
- 7. Pool heaters <1 MMBtu/hr maximum gross heat output, each
- 8. Portable kerosene space heaters
- 9. Sewage treatment facilities
- 10. Silk screening
- 11. Smokehouse
- 12. Storage tanks <550 gallons
- 13. Water heaters used for comfort heating, <1 MMBtu/hr maximum gross heat output, each
- 14. Twenty-six natural gas-fired laundry dryers @ 32.6 MMBtu/hr total heat input.

# Best Available Control Technology (BACT) Determination Walt Disney World Company Orange County

The applicant proposes to permit four natural gas fired boilers at two existing laundry operations. Boilers No. 1, 2 and 3, manufactured by York-Shipley, are exhausted through a common stack identified as LDB-1. Boiler No. 4 is manufactured by Fulton and identified as LDB-2. The maximum heat inputs to units 1, 2, 3 and 4 will be 12.5, 12.5, 14.6 and 7.7 MMBtu/hr, respectively. The boilers will be located within the Walt Disney complex in Orange County, Florida.

This BACT determination is required for the sources as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

#### BACT Determination Required by the Applicant:

Particulate and sulfur dioxide emissions to be controlled by firing of natural gas.

#### Review of Group Members:

The determination was based upon comments received from the Stationary Source Control Section.

#### BACT Determination by DER:

The amount of particulate and sulfur dioxide emissions emitted from the boilers will be limited by the firing of natural gas.

#### BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern, in that most of the fuel sulfur becomes  $SO_2$ , and particulate emissions from fuel burning are related to the sulfur content. The firing of natural gas generates a minimal amount of particulates and  $SO_2$  and is therefore deemed as BACT for the above referenced boilers.

#### Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator Department of Environmental Regulation Bureau of Air Quality Management 2600 Blairstone Road Tallahassee, Florida 32399-2400 Walt Disney World Company Page Two

Recommended by:

C. H. Fancy, P.E. Deputy Bureau Chief, BAQM

24 march, 1989

Date

Approved by:

Dale Twachtmann, Secretary

1989

# Final Determination

Reedy Creek Improvement District
Central Energy Plant
Lake Buena Vista, Florida
Orange County

Gas Turbine and Heat Recovery Steam Generator
With Duct Burner - GE LM 5000
38 Megawatts

Permit No. 0950110-001-AC Previously AC48-137740

Department of Environmental Protection Division of Air Resources Management Bureau of Air Regulation

February 12, 1996

#### Final Determination

On June 22, 1995, an application was received from the Reedy Creek Improvement District (RCID) to modify the construction permit for its 38 megawatt (MW) gas turbine electrical generator with a heat recovery steam generator (HRSG) and duct burner located at the Central Energy Plant in Lake Buena Vista, Orange County. The purpose of the modification is to allow an <u>increase</u> in carbon monoxide (CO) emissions so that the unit may subsequently operate at <u>lower power output levels</u>.

The effect of operating at lower loads is that carbon monoxide emissions may be as high as 110 tons per year (TPY) compared to the previously permitted limit of 48 TPY. However, during those periods, nitrogen oxide (NO<sub>x</sub>) emissions will be lower. If the unit were operated solely at low load (approximately 15 MW), CO emissions would increase by 48 TPY while NO<sub>x</sub> emissions would decrease by over 100 TPY from the presently permitted limit of 337 TPY.

Because RCID wishes to maintain the flexibility to operate at high and low loads, the only change required in the permit is the increase in the limit for CO. The increase in emissions is less than significant with respect to applicability of Prevention of Significant Deterioration (PSD). The unit utilizes water injection for NO<sub>x</sub> control and is fired with natural gas except when it is unavailable.

The Notice of Intent to Issue was published on December 8, 1995 in the Orlando Sentinel. The following comments were received during the 14 day comment period. The Department's response to these comments are also detailed below.

#### Comments from Applicant with Department's Response:

A.

Comment:

Preliminary Determination

Third paragraph: Last Sentence-Replace "steam" with "water". The NO<sub>x</sub> control system uses water injection.

Response:

Corrected in final Determination to reflect use of water instead of steam.

В.

Comment:

Specific Condition 1.

The modifications to the construction permit which were dated February 15, 1991, May 29, 1991, August 13, 1991, and December 15, 1993 have also been issued by the Department. These should be added to the list in the condition.

#### Response:

The list of amendments was deleted since all previous amendments/modifications have been incorporated into the new construction permit.

#### Comment:

# Specific Condition 2.

- 1. Nitrogen Oxides: Under the column "Pollutant" the word "avg." under nitrogen oxides should be clarified by adding the word "annual" before "avg.". The original intent of the word average was to calculate and ensure annual average NO<sub>x</sub> emissions meet the 77 lb/hr/337 TPY for gas and 100 lb/hr/17 TPY for oil. This is described by the footnote under the table which states: "The average emissions will be calculated using hourly.....plans." To clarify this condition, the words "annual average" should be used. Also, the wording of the footnote may be somewhat confusing as to whether it applies to both the turbine and duct burner and the mechanism as to how the annual average is calculated. It is recommended that the wording of the footnote be changed to read:
  - "The average NO<sub>x</sub> emission from the turbine and duct burner combined will be calculated to obtain monthly average; an annual average is calculated using consecutive monthly averages."
- Sulfur Dioxide: The sulfur dioxide emissions for gas firing should be 1.2 lb/hr and 5.1 TPY. These
  emission rates were included in the permit revision dated August 13, 1991 that was issued by the
  Department.
- 3. Footnote 1: This footnote was changed by the January 7, 1993 permit amendment issued by the Department to read:
  - "Fuel oil firing shall be limited to 14 days per year."
- 4. Footnote 6: It is suggested that the term "NO<sub>x</sub>" be included before "concentration" in this footnote since the footnote only applies to NO<sub>x</sub>. Therefore, the footnote would read: "Variation in NO<sub>x</sub> concentration with variation in ..... results."
- 5. Bottom footnote: The references to oil should be deleted since oil firing was eliminated by a permit modification and the duct burner unit is not capable of firing oil.

#### Response:

- 1. Change has been made.
- 2. Change has been made.
- 3. Change has been made.
- 4. Change has been made.
- 5. Change has been made.

#### D.

Comment:

Specific Condition 4.

The Department's memorandum of November 22, 1995 would suggest that testing at intermediate and low loads is unnecessary. The relationships developed in the permit application indicate that CO rises with turbine inlet temperature and varies with load and water to fuel ratio. Since the water to fuel ratio would not be reduced from that in the permit, CO concentrations would not deviate from this relationship. This will be confirmed by the initial compliance tests. Thus, it is suggested that this condition be changes as follows:

"Annual stack testing for CO emissions at full capacity load conditions shall be performed according to an annual test protocol developed jointly by RCID and FDEP. This protocol will specify the test methods and procedures to be used during the annual compliance testing. Using the established procedures of this protocol as a guide, simultaneous testing full capacity load conditions shall be conducted for CO, NO<sub>x</sub> and VE. EPA Method 10 shall be used for CO, EPA Methods 7e or 20 shall be used for NO<sub>x</sub> and EPA Method 9 shall be used for VE. Testing at other loads will not be necessary if the annual compliance test is within the expected CO/NO<sub>x</sub> relationship developed from the initial compliance tests."

#### Response:

Suggested language is incorporated.

#### Additional Changes made to the permit by the Department to clarify certain issues.

The Department changed footnote 6 in specific condition 5 to reflect the requirements in Subpart GG, 40 CFR 60.334 and 60.335.

Footnote 7 was added to the table to clarify that compliance with the SO<sub>2</sub> limitations may be demonstrated by fuel analysis or Method 20 pursuant to Subpart GG.

Footnote 8 was added to clarify that 62-297.340(1)(e) (F.A.C.) provides relief from annual compliance testing for PM when firing liquid fuels for less than 400 hours per year. Specific Condition 2 limits fuel oil operation to less then 400 hrs/vr.

VOC testing has been limited to the initial compliance test since initial test results indicated non-detectable levels of VOC using Method 25A.

The final determination of the Department is to amend and re-issue the construction permit as indicated in the Intent to Issue with the changes indicated above.

The electrical production capacity was corrected to 38 MW for consistency with the original construction permit.



# Department of Environmental Protection

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

Virginia B. Wetherel

PERMITTEE:

Reedy Creek Improvement District Post Office Box 10170 Lake Buena Vista, Florida 32830-0170 Permit No: 0950110-001-AC Expiration Date: July 1, 1996

County: Orange

Latitude/Longitude: 28°25'30"N 81°35'10"W Project: GE Gas-Fired Turbine with Heat

Recovery System \(\gamma\)

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-212, 62-275, 62-296, and 62-297, Florida Administrative Code (F.A.C.). It replaces and amends previously issued permit No. AC48-137740 dated March 3, 1988 and revisions thereto. 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 specifically described as follows:

For the construction of a 38 MW GE LM 5000 gas or oil-fired turbine generator system with a heat input capacity of 450 MMBtu/hr. The project includes a gas-fired duct burner, heat recovery boiler and steam turbine, at the Central Energy Plant at Bay Lake near Lake Buena Vista, Orange County, Florida. The unit will be operated at low and intermediate load conditions as well as the previously permitted base load condition.

Construction will be in accordance with the permit application and plans, documents, and reference material submitted unless otherwise stated in the general and specific conditions herein.

#### Attachments are listed below:

- 1. Original permit AC48-137740 dated March 3, 1988.
- 2. Amendments/extensions/revisions of original permit dated 9/14/88, 5/17/89, 11/13/89, 1/15/91, 2/15/91, 5/29/91, 8/13/91, 1/7/93, 10/29/93, 12/15/93, 3/30/95, 6/16/95
- 3. RCID's application received June 22, 1995.
- 4. DEP letter requesting additional information dated July 6, 1995.
- 5. RCID's response received August 25, 1995.
- 6. RCID's Waiver of 90 Day Time Limit received November 9, 1995.
- 7. DEP's Draft Amended Permit Issued November 30, 1995.
- 8. RCID's Letter and Proof of publication received December 20, 1995.
- 9. KBN's comments to the Draft Amended Permit.

Permittee: Reedy Creek Improvement District Permit Number: 0950110-001-AC Expiration Date: July 1, 1996

#### 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 403.161, 403.727, or 403.859 through 403.861, 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 F.S. 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 or 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 the 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.

# Permittee: Reedy Creek Improvement District

Permit Number:

0950110-001-AC

**Expiration Date:** 

July 1, 1996

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 non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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.

- 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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, 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 F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, 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)
     ( X ) Compliance with New Source Performance Standards (NSPS)
- 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 instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for his 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.

#### Permittee:

Reedy Creek Improvement District

Permit Number:

0950110-001-AC

Expiration Date: July 1, 1996

- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used:
- the results of such analyses.

#### SPECIFIC CONDITIONS:

- 1. The turbine may operate continuously (8760 hr/yr).
- 2. Natural gas shall be the primary fuel fired in the turbines and duct burner system. No. 2 fuel oil can be used as a backup fuel in the turbine only for up to 14 days per year.
- 3. The maximum heat input to the turbine and the duct burner combined shall not exceed 450 MMBtu/hr (normal duct burner heat input rate of 23 MMBtu/hr).
- 4. When the gas turbine is not in operation, the duct burner heat input may be increased up to, but not to exceed, 198 MMBtu/hr.

5. The emissions, from the turbine and duct burner combined, shall not exceed:

Pollutant	Gas-fired		Oil Fired <sup>i</sup>	
•	lb/hr	TPY <sup>2</sup>	lb/hr	TPY
Nitrogen Oxides (NO <sub>x</sub> ) peak based on 40°F	112		132	
annual average <sup>3</sup>	77	337	100	17
Sulfur Dioxide (SO <sub>2</sub> ) <sup>7</sup>	1.2	5.1	118	20
Particulates (PM) <sup>8</sup>	0.8	3.5	9	2
Carbon Monoxide (CO) peak load <sup>4</sup>	11		- 24	4
reduced load4	25	110	N/A <sup>5</sup>	N/A <sup>5</sup>
Volatile Organic Compounds (VOCs) <sup>8</sup>	6	26	6	1
Visible Emissions (VE)	5% Opacity		10% Opacity	
NO <sub>x</sub> , @ 15% O <sub>2</sub> dry basis peak	74 ppmv		82 ppmv <sup>6</sup>	
average <sup>3</sup>	58 ppmv		68 ppmv	
SO <sub>2</sub> . @ 15% oxygen dry basis			58 ppmv	

<sup>1.</sup> Fuel oil firing shall be limited to 14 days per year.

The duct burner  $NO_x$  emissions shall not exceed (corresponding to 0.2 lb/MMBtu) 4.6 lb/hr for gas at 23 MMBtu heat input or 40 lb/hr for gas at 198 MMBtu/hr.

<sup>&</sup>lt;sup>2</sup> TPY (tons per year)

<sup>&</sup>lt;sup>3.</sup> The 12 month rolling average emissions will be calculated using hourly averages during the month and then using consecutive monthly averages to obtain an annual average. The DEP District office may alter this averaging method after due consideration of alternative compliance plans.

A Reduced load is 15.0 MW - 29.0 MW. Peak Load is above 29.0 MW.

<sup>5.</sup> When the turbine is oil-fired it shall not be operated at reduced load conditions.

<sup>&</sup>lt;sup>6</sup> Variation in NO<sub>x</sub> concentration with variation in water to fuel ratios shall be documented by a plot of pollutant concentration versus water to fuel ratios, as per the most recent 4 load compliance test results.

<sup>&</sup>lt;sup>7</sup> Subsequent to initial compliance tests, compliance may also demonstrated by fuel analysis pursuant to 40 CFR 60.333

<sup>8</sup> Initial compliance test only.

Permittee: Reedy Creek Improvement District Permit Number: 0950110-001-AC

Expiration Date: July 1, 1996

6. The No. 2 oil sulfur content shall not exceed 0.4 percent.

7. In accordance with Rule 62-210.300(3) F.A.C., the Black Start Cummings No. 2 fuel oil fired emergency electric generator is exempt from permitting requirements

Pursuant to Rule 62-210.300(3), F.A.C., this source, although exempt from permitting requirements of Chapter 62-210 and Chapter 62-4, F.A.C., "shall be subject to any applicable emission standard specified in Rule 62-252.300, and 62-296, F.A.C., other than Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) requirements."

Furthermore, pursuant to Rule 62-213.420(3) (m), F.A.C., this source, is required to be included in the Title V operation permit application.

- 8. Water injection shall be utilized for  $NO_x$  control at a minimum of 0.6/1.0 water to fuel ratio. If compliance testing warrants this ratio to be re-investigated, the ratio at which compliance is maintained shall be incorporated into the permit.
- 9. Pursuant to Rule 62-297.340, F.A.C., Frequency of Compliance Tests, initial and annual compliance testing shall be conducted with the fuels used in the preceding 12 month period using:
  - 1. EPA Method 20 for NO<sub>x</sub> and SO<sub>2</sub> (fuel sulfur analysis may be used for SO<sub>2</sub>)
  - 2. EPA Method 10 for CO
  - 3. EPA Method 9 for VE

Other DEP approved methods may be used for compliance testing only after prior Departmental approval.

- 10. The proposed project shall comply with all the applicable requirements of:
  - a) Chapter 62-4, and 62-210 through 62-297, F.A.C.
  - b) 40 CFR 60, Subpart GG, Gas Turbines
- 11. **DEP's** district office shall be notified in writing at least 15 days prior to source testing. Written reports of the tests shall be submitted to the district office within 45 days of test completion.

The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit (Rule 62-2, F.A.C.).

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and a Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate (Rules 62-2 and 62-4, F.A.C.).

Permittee: Reedy Creek Improvement District Permit Number:

0950110-001-AC

Expiration Date: July 1, 1996

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application (Rule 62-4, F.A.C.).

- 12. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to DEP's District office.
- 13. During the new turbine debugging period, not to exceed nine months, the older Orenda power trains shall not be fired unless the new GE turbine is not in operation. After the debugging period is over, the Orenda turbines and their associated equipment shall be dismantled.
- 14. An initial compliance test shall be conducted in order to obtain the air operation permit for the modification. This test will consist of testing CO emissions at peak, two intermediate and low load conditions. Test day peak load based on BTU input will be established based on the operating limits of the unit during the test day. Intermediate loads shall be established based on equally spaced points between peak and low load levels. Initial compliance testing at all load conditions will be conducted with the duct burners operating. If compliance with the proposed emission rate is demonstrated during this initial compliance test, revised annual CO compliance test procedures will be incorporated as part of the annual stack test protocol.
- 15. Subsequent to the initial test, annual stack testing for CO emissions at full capacity load conditions shall be performed according to an annual test protocol developed jointly by RCID and FDEP. This protocol will specify the test methods and procedures to be used during the annual compliance testing. Using the established procedures of this protocol as a guide, simultaneous testing full capacity load conditions shall be conducted for CO, NO<sub>x</sub> and VE. EPA Method 10 shall be used for CO, EPA Methods 7e or 20 shall be used for NO<sub>x</sub> and EPA Method 9 shall be used for VE. Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO<sub>x</sub> and CO and the annual compliance test emissions data is within the expected CO/NO<sub>x</sub> relationship developed from the initial compliance tests.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes. Director

Division of Air Resources Management



# Department of **Environmental Protection**

Lawton Chiles Governor

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

Virginia B. Wetherell Secretary

NOTICE OF PERMIT

In the matter of an Application for Permit by: DEP File No. 0950110-001-AC Orange County

Mr. Thomas M. Moses, District Administrator Reedy Creek Improvement District Post Office Box 10170 Lake Buena Vista, Florida 32830-0170

Attached is the construction permit No. 0950110-001-AC which is a re-issued and amended version of permit No. AC48-137740. It is for the existing 38 MW turbine generator and heat recovery steam generator with duct burner located at the Central Energy Plant in Lake Buena Vista. This permit is issued pursuant to Section 403. Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing of a Notice Of Appeal pursuant to Rule 9.110. Florida rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 14 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E., Chief Bureau of Air Regulation 2600 Blair Stone Road Tallahassee. Florida 32399 904-488-1344

#### CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed by certified mail before the close of business on  $\frac{2}{3}$   $\frac{36-76}{2}$  to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on

this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk. receipt of which is hereby acknowledged.

Copies furnished to:

A. Zahm, CD

K. Kosky, KBN

Protest Division of the

Printed on recycled paper.



# Department of **Environmental Protection**

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

Virginia B. Wetherell Secretary

April 1, 1997

# CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William O'Toole Senior Vice President Reedy Creek Improvement District P.O. Box 10000 Lake Buena Vista, Florida 32830-1000

Re: Permit Modification No. 0950110-002-AC Reedy Creek Improvement District

Dear Mr. O'Toole:

The Department has reviewed Reedy Creek Improvement District's (RCID) letter received on October 23, 1996 requesting an amendment to its construction permit for an existing 38 MW gas turbine at its Central Energy Plant in Lake Buena Vista, Florida. This permit also includes the change requested in RCID's letter received on December 16, 1996. These requests are acceptable and the permit is hereby amended as follows:

# Specific Condition No. 5

Under the column in the table titled "TPY" and across from the pollutant "Nitrogen oxides ( $NO_x$ ) peak based on 40°F annual average"

#### From:

	Gas Fired		Oil Fired	
•	lb/hr	TPY	lb/hr	TPY
Nitrogen Oxides (NOx) peak	112		132	<u> </u>
based on 40°F annual average	77	337	100	17

#### To:

	Gas Fired		Oil Fired		
	lb/hr	TPY	lb/hr	TPY	
Nitrogen Oxides (NO <sub>x</sub> ) peak	112		132		
based on 40°F annual average	77	280	100	17	

Mr. William O'Toole Page 2 of 3 April 1, 1997

Also under footnote 3 in the table add: "The TPY limit includes any emissions from oil firing".

## Specific Condition No. 5

Under the column in the table titled "Gas fired lb/hr" and across from the pollutant "Carbon Monoxide (CO) peak load<sup>4</sup>"

From:				Υ .
	Gas Fired		Oil Fired	
	lb/hr	TPY	lb/hr	TPY:
Carbon Monoxide (CO) peak load	11		2.1	4
reduced load	25	110	N/A <sup>5</sup>	N/A <sup>5</sup>
то:				
	Gas Fired		Oil Fired	
_	lb/hr	TPY	lb/hr	TPY .
Carbon Monoxide (CO)	25	110	24	4

Footnotes 4 and 5 no longer apply

# Specific Condition No. 8, first sentence:

From:

Water injection shall be utilized for NO<sub>x</sub> control at a minimum of 0.6/1.0 water to fuel ratio.

To:

Water injection shall be utilized for NO<sub>x</sub> control at a minimum of 0.6/1.0 water to fuel ratio. 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.

## Specific Condition 15:

#### From:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for  $NO_x$  and CO and the annual compliance test emissions data is within the expected  $CO/NO_x$  relationship developed from the initial compliance tests.

To:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for  $NO_x$  and CO.

Mr. William O'Toole Page 3 of 3 April 1, 1997

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,

Howard L./Rhodes, Director

Division of Air Resources

Management

HLR/ch/

Enclosures

# STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an Application for Permit Modification

Reedy Creek Improvement District P.O. Box 10000 Lake Buena Vista, Florida 32380-1000/ DEP File No.: 0950110-002-AC 38 MW Gas Turbine at Reedy Creek

Orange County

Enclosed is a letter that modifies Permit Number 0950110-002. This letter authorizes the replacement of existing combustors on Reedy Creek's 38 MW gas turbine with new extended venturi combustors. This permit modification is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department 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 Department.

Executed in Tallahassee, Florida.

C.H. Fancy, P.E., Chief Bureau of Air Regulation

#### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4-1-9 to the person(s) listed:

Mr. William O'Toole, RCID \*

M!. Edward Godwin, P.E., RCID \*

Mr. Ken Kosky, P.E. Golder Associates

Mr. Brian Beals, EPA

Mr. John Bunyak, NPS

Mr. Dennis Nester, OCEPD

Clerk Stamp

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

Clerk)

(Date)



# **RECEIVED**

OCT 03 1997

BUREAU OF AIR REGULATION

September 30, 1997

Mr. Bruce Mitchell Florida Department of Environmental Protection 2600 Blair Stone Rd. MS 5505 Tallahassee, Florida 32399-2400

RE: Perchloroethylene dry cleaning system

Compliance Plan

Dear Mr. Mitchell:

This letter is in response to your request for a Compliance Plan and a Statement of Compliance regarding the above referenced emissions unit. The following points enumerate the facts surrounding the compliance situation for the dry cleaning facility and constitute the Compliance Plan:

- A construction permit application was submitted to the Central District Department of Environmental Protection (FDEP) office on July 17, 1997, to address changes in the operation and equipment at the Walt Disney World dry cleaning facility, and to remove obsolete permit conditions that are no longer applicable to its operation. As an aside, the new potential-to-emit has been reduced from 1.5 tons to 0.5 tons of Perchloroethylene (PERC) per year.
- The public notice for the intent to issue will be submitted some time before the end of calendar year 1997. The Central District has until December 2, 1997 to issue a draft permit for the emissions unit. Once the construction permit has been issued, a revision will be applied for to the Title V operating permit.
- Enclosed is the updated Statement of Compliance for the Walt Disney World facility, signed by Vice President Lee Schmudde, who is the Title V Responsible Official for this facility.



Bruce Mitchell
Page 2
September 30, 1997

• The following table lists the applicable sections of the NESHAP Part 63 Subpart M and clarifies whether the unit is currently in compliance.

Applicable	Description $\psi_n$		npliance	Comment	
Section	·	Yes	No	7	
§ 63.320 (a)	Applies to PERC dry cleaning facilities	¥	<u> </u>		
§ 63.320 (b)	Provides compliance dates for units built after December 9, 1991	1		1	
§ 63.320 (c)	Provides compliance dates for units built before December 9, 1991		1	N/A	
§ 63.320 (d)	Applies standards to dry-to-dry facilities using less than 140 gal PERC/yr			N/A	
§ 63.320 (e)	Applies standards to transfer facilities using less than 200 gal PERC/yr		1	N/A	
§ 63.320 (f)	Sets compliance dates for facilities that now exceed (d) or (e)			N/A	
§ 63.320 (g)	Designation as Major Source if PTE is greater than 10 tpy or			N/A	
§ 63.320 (g)(1)	Designation as Major Source if PERC consumption is greater than 2,100	<b>—</b>		Ī	
	gallons in exclusive dry-to-dry facility or				
§ 63.320 (g)(2)	Designation as Major Source if PERC consumption is greater than 1,800			N/A	
	gallons for mixed facilities				
§ 63.320 (h)	Area source designation			N/A	
§ 63.320 (i)	Designation as major source if PERC consumption increases			N/A	
§ 63.320 (j)	Coin-operated machine exemption			N/A	
§ 63.320 (k)	Title V permitting requirements			1	
§ 63.321	Definitions			N/A	
§ 63.322 (a)	Requires compliance with (a)(1) or (a)(2) and (a)(3) of this section	<b>√</b>	1		
§ 63.322 (a)(1)	Specifies the use of a refrigerated condenser or equivalent				
§ 63.322 (a)(1)	Specifies the use of a carbon adsorber				
§ 63.322 (a)(3)	Describes transfer system room enclosure specifications			N/A	
§ 63.322 (b)	Specifications for new dry cleaning systems	·		N/A	
§ 63.322 (b)(1)	Specifies the use of a refrigerated condenser or equivalent			N/A	
§ 63.322 (b)(1)	Elimination of emissions from transfer of articles between washers and dryers	•		N/A	
§ 63.322 (b)(2)	Specifies the use of a carbon adsorber		<u> </u>	N/A	
§ 63.322 (b)(3)	Machine doors must be kept closed immediately following removal of		<u> </u>	IVA	
g 03.322 (C)	articles and at all other times	•			
§ 63.322 (d)	Operation of machines must be according to manufacturer's .			-	
§ 03.322 (d)	recommendations	•	1	,	
§ 63.322 (e)(1)	Refrigerated condenser must be operated as to not vent vapors to the		1		
\$ 05.522 (0)(1)	atmosphere while drum is rotating	•			
§ 63.322 (e)(2)	Refrigerated condenser must be monitored in accordance with	<b>✓</b>		<del> </del>	
3 03.322 (0)(2)	§ 63.323(a)(1)	·	]		
§ 63.322 (e)(3)	Refrigerated condenser shall be operated with a diverter valve which prevents	<b>✓</b>		+	
3 03.522 (0)(3)	air drawn in through the open doors from passing through the condenser.				
§ 63.322 (f)	Requirements for refrigerated condensers for purposes of complying with (a)			1	
J (-)	of this section.				
§ 63.322 (f)(1)	Prohibits venting of PERC gas vapors to atmosphere until washer door is	<b>√</b>	1	1	
3 (-)(-)	opened				
§ 63.322 (f)(2)	Requires monitoring according to § 63.323(a)(2)		<del>                                     </del>	+	
§ 63.322 (f)(3)	Prohibits use of same condenser coil for a washer that is used by other	· · · · · · · · · · · · · · · · · · ·	<del>                                     </del>	N/A	
3 32 12 -2 (1)(3)	systems		1.	''''	



# Bruce Mitchell Page 3 September 30, 1997

§ 63.324 (b)(1)	Testament to accuracy and truth of above statements	✓	
§ 63.324 (b)(1)	Compliance certification with § 63.322	<b>✓</b>	
§ 63.324 (b)(1)	Yearly PERC solvent consumption	✓	
§ 63.324 (b)	By July 18, 1994 the following must be provided, signed by a responsible official:	<b>✓</b>	
(6)	consumption documentation, description of control devices, demonstration of compliance with § 63.322 (a)(3)		
§ 63.324 (a)(1)-	Facility owner, address, description of dry cleaning machines, PERC	✓	
§ 63.324	By June 18, 1994 the following must be provided:	✓	
§ 63.323 (d)(3)	Total sum of paragraph (d) of this section is the yearly PERC consumption	<b>✓</b>	
§ 63.323 (d)(2)	If no PERC purchases were made, sum = 0 gallons	<b>√</b>	
§ 63.323 (d)(1)	Sum all the volumes of the previous 12 months	<b>✓</b>	
§ 63.323 (d)	PERC consumption calculations must be made at the beginning of each month	<b>~</b>	
§ 63.323 (c)(3)	Conduct weekly monitoring	<b>✓</b>	
§ 63.323 (c)(2)	Tubes must be used according to manufacturer's instructions	✓	
§ 63.323 (c)(1)	=< 300ppm PERC  Colorimetric detector tubes are to be used that have an accuracy of ± 75 ppm	<b>✓</b>	
§ 63.323 (c)	from bends, etc. and at least 2 stack diameters upstream from bends, etc.  If carbon adsorber is used for compliance with § 63.322 (b)(3), drum must be		
§ 63.323 (b)(3)	Provide a sampling port such that it is at least 8 stack diameters downstream	<b>✓</b>	
§ 63.323 (b)(2)	Tubes must be used according to manufacturer's instructions	✓	
§ 63.323 (b)(1)	Colorimetric detector tubes are to be used that have an accuracy of $\pm 25$ ppm	✓	
§ 63.323 (b)	Carbon adsorber exhaust must be =< 100ppm PERC	✓	
§ 63.323 (a)(2)(ii)	Temp. difference calculations must be made weekly	<b>✓</b>	
§ 63.323 (a)(2)(i)	outlet gas streams of the condenser.  Temp. sensor range from 32 to 120 °F and accurate to ± 2 °F	✓	1
§ 63.323 (a)(2)	accurate to ± 20 °F.  Temperature difference calculations must be made between the inlet and	<b>✓</b>	
§ 63.323 (a)(1)	Outlet side temperature must be measured to determine that it is below 45° F.  The sensor must be operated according to manufacturer's instructions,	<b>✓</b>	
	condenser is used to comply with § 63.322 (a) or (b)		
§ 63.323 (a)	Defines applicability to following monitoring requirements if refrigerated	<b>✓</b>	
§ 63.322 (n)	Action schedule based on monitoring results from § 63.323 (a), (b), or (c)	<b>✓</b>	
§ 63.322 (m)	Leak repair schedule	<b>✓</b>	1 1/4 1
(11) § 63.322 (l)	Biweekly inspections of major components for small facilities		N/A
§ 63.322 (k)(1)-	Weekly inspections must be performed for all major system components	<b>✓</b>	
§ 63.322 (j)	PERC and wastes must be stored in containers with no perceptible leaks	✓ 1	13/73
§ 63.322 (h)(2) § 63.322 (i)	Requires a different carbon adsorber from one used to comply with (a)(2) or (b)(3)  Requires 24 hour drain time for adsorber cartridges before removal	<b>N</b> ,	N/A N/A
§ 63.322 (h)(1)	Specifies venting of all air in room through carbon adsorber or equivalent	·	N/A
§ 63.322 (h)	Room enclosure requirements for compliance with (a)(3) of this section	ş-	N/A
§ 63.322 (g)(2)	Carbon adsorber must be monitored in accordance with § 63.323(b) or (c)	<b>✓</b>	
	Carbon adsorber may not be bypassed to allow release of PERC-laden air to the atmosphere		



Bruce Mitchell Page 4 September 30, 1997

§ 63.324 (c)	Applicable to former area sources that now exceed are source thresholds:	1 21 with .	27.25.01.25	N/A -
§ 63.324 (c)(1)	New PERC consumption limit			N/A
§ 63.324 (c)(2)	Compliance certification with § 63.322			N/A
§ 63.324 (c)(3)	Testament to accuracy and truth of above statements			N/A
§ 63.324 (d)	Maintain PERC purchase records for a minimum of five years including:			
§ 63.324 (d)(1)	Volume PERC purchased each month	1 🗸	-	
§ 63.324 (d)(2)	Calculations of yearly PERC consumption	<b></b>		
§ 63.324 (d)(3)	Leak inspection dates and leak inspection results	- Y		
§ 63.324 (d)(4)	Repair dates and records resulting from leak inspections	<b>✓</b>		
§ 63.324 (d)(5)	Temperature sensor monitoring results and dates	1		
§ 63.324 (d)(6)	Colorimetric tube monitoring results and dates	✓		
§ 63.324 (e)	Maintain design specifications and operating instructions onsite			
§ 63.325	Equivalent control technology requirements			N/A

If you have any questions or need any further information, please call me at (407) 827-4524.

Sincerely,

Rich Bumar

Environmental Control Representative

Environmental Control

By Certified Mail

cc: Bob Beaver

Roger Home

Mike Morrow

Armando Rodriguez

Lee Schmudde

## COMPLIANCE CERTIFICATION

1. Proposed Schedule for the Submission of Periodic Compliance Statements Throughout the Permit Term.

Periodic Compliance Statements are proposed to be submitted on an annual basis, consistent with FDEP Rule 62-213.440(3)(b), F.A.C.

# 2. Compliance Certification

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Signature

Lee G. Schmudde

/- 2**7**-

Date

Date: From:

10/13/97 12:25:59 PM Elizabeth Walker TAL

Subject:

New posting See Below To:

There is a new posting available on the Florida Website

WALT DISNEY WORLD

0950111005AV Draft

The notification letter is encoded and attached.

Thanks, Elizabeth