

RECEIVED

OCT 12 2007

October 1, 2007

BUREAU OF AIR REGULATION

Mr. Scott Sheplak, P.E.
Title V Program Coordinator
Air Permitting South Section
Bureau of Air Regulation
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE:

Permit 0950111-028-AC

Walt Disney World Complex Dry Cleaning Machine

Completion of Construction

Dear Mr. Sheplak:

This letter is to inform the Department that the construction and installation of the new dry cleaning machine at the Walt Disney World (WDW) North Service Area Laundry has been completed in accordance with the conditions of the above referenced permit. This machine has replaced the Multimatic 45 drycleaning machine (E.U. 001) that has been dismantled and is no longer in service. It is requested that the new unit be included in the current TV permit renewal, project number 0950111-029-AV.

Please find enclosed the WDW Responsible Official's certification and my professional engineer's certification for this activity.

If you have any questions or comments, please contact me at (407) 824-7129.

Sincerely,

Rich Bumar, P.E.

Sr. Environmental Control Representative WDW Environmental Control Department

Enclosure

cc: James Bradner

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

| 1. | Application Responsible Official Name: |
|----|---|
| 2. | Application Responsible Official Qualification (Check one or more of the following options, as applicable): |
| | x For a corporation, the president, secretary, treasurer, or vice-president of the corporation in |
| | charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. |
| | For a partnership or sole proprietorship, a general partner or the proprietor, respectively. |
| | For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. |
| | The designated representative at an Acid Rain source. |
| 3. | Application Responsible Official Mailing Address |
| | Organization/Firm: Walt Disney World Co. |
| | Street Address: PO Box 10000 |
| | City: Lake Buena Vista State: FL Zip Code: 32830-1000 |
| 4. | Application Responsible Official Telephone Numbers Telephone: (407) 828 - 1723 ext. Fax: (407) 828 - 1180 |
| 5. | Application Responsible Official Email Address: lee.schmudde@disney.com |
| 6. | Application Responsible Official Certification: |
| _ | I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application. |
| | |
| | Signature Date |

DEP Form No. 62-210.900(1) - Form

Effective: 2/2/06 5

APPLICATION INFORMATION

| D. | refersional Engineer Contignation |
|----|---|
| | <u>rofessional Engineer Certification</u> Professional Engineer Name: Richard A. Bumar, Jr. |
| 1. | Registration Number: 55375 |
| 2. | |
| | Street Address: PO Box 10000 |
| | City: Lake Buena Vista State: FL Zip Code: 32830-1000 |
| 3. | Professional Engineer Telephone Numbers |
| | Telephone: (407) 824-7129 ext. Fax: (407) 824-7455 |
| 4. | Professional Engineer Email Address: rich.bumar@disney.com |
| 5. | Professional Engineer Statement: |
| | I, the undersigned, hereby certify, except as particularly noted herein*, that: |
| | (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and |
| | (2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application. |
| | (3) If the purpose of this application is to obtain a Title V air operation permit (check here \searrow), if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application. |
| | (4) If the purpose of this application is to obtain an air construction permit (check here, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application. |
| | (5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here \int i, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with |

* Attach any exception to certification statement.

provisions contajned in such permit.

2-210.900(1) - Form

10/1/07 Date

DRAFT/PROPOSED Title V Permit, Notification of Publication of Public Notice

Electronically Sent - Received Receipt Requested

TO:

Ms. Katy R. Forney, U.S. EPA, Region 4: Forney.Kathleen@epa.gov

FROM:

Scott M. Sheplak, Florida DEP: Scott.Sheplak@dep.state.fl.us

Re:

DRAFT/PROPOSED Title V Permit, Notification of Publication of Public Notice

Walt Disney World Resort Complex Title V Air Operation Permit Renewal

DRAFT/PROPOSED Permit No.: 0950111-029-AV

Parallel Review

This project is being processed using a parallel review. The purpose of this e-mail is to notify the United States Environmental Protection Agency (USEPA) Region 4 of the beginning and end dates of the public comment period for the subject permit.

The Public Notice for the subject permit was published on October 11, 2007. Proof of publication of the Public Notice was received on October 18. The USEPA Region 4 review period begins on the date of publication (beginning of the public comment period) and ends on the 45th day after publication {Day 45 is **November 25**}.

Provided an objection (veto) is not received from USEPA, the DRAFT/PROPOSED permit will become a FINAL permit by operation of law on the 55th day after the permit posting date {Day 55 is **December 5**}.

copy to: Barbara Friday

File

From:

Harvey, Mary

Sent:

Tuesday, October 23, 2007 7:50 AM

To:

Sheplak, Scott

Subject:

FW: FW: DRAFT-PROPOSED public notice notification memo to EPA

Attachments: DRAFT-PROPOSED public notice notification memo to EPA.doc

----Original Message----

From: Forney.Kathleen@epamail.epa.gov [mailto:Forney.Kathleen@epamail.epa.gov]

Sent: Monday, October 22, 2007 5:14 PM

To: Harvey, Mary Cc: Sheplak, Scott

Subject: Re: FW: DRAFT-PROPOSED public notice notification memo to EPA

thanks

Katy R. Forney Air Permits Section EPA - Region 4 61 Forsyth St., SW Atlanta, GA 30024

Phone: 404-562-9130 Fax: 404-562-9019

> "Harvey, Mary" <Mary.Harvey@dep .state.fl.us>

10/18/2007 02:06

PM

Kathleen Forney/R4/USEPA/US@EPA

"Sheplak, Scott"

<Scott.Sheplak@dep.state.fl.us> Subject FW: DRAFT-PROPOSED public notice

notification memo to EPA

ear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

Lile-

From: Bumar, Rich [Rich.Bumar@disney.com]

Sent: Friday, September 14, 2007 11:34 AM

To: Sheplak, Scott

Subject: RE: Walt Disney World Title V Renewal pre-DRAFT/PROPOSED permit

The DISC Generators (re: sob) are active.

Rich

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]

Sent: Friday, September 14, 2007 9:57 AM

To: Bumar, Rich

Subject: Walt Disney World Title V Renewal pre-DRAFT/PROPOSED permit

Please find a pre-DRAFT/PROPOSED permit package attached.

The Statement of Basis (sob) overviews the changes made. I had one question that is highlighted in red in the sob.

I am available to discuss if that helps.

I appreciate your review!

P.S. If you want the recently issued AC permit for the perc. dry cleaner replacement could be rolled into this with a mini-compliance plan that way you would not have to revise the TV permit when construction is complete. Let me know if you would want to do this.

- fle-

From: Bumar, Rich [Rich.Bumar@disney.com]

Sent: Friday, September 14, 2007 10:08 AM

To: Sheplak, Scott

Subject: RE: Parallel Review of Title V Permit

Yes, please proceed with the parallel review for the WDW Title V renewal.

Rich Bumar, PE

Sr. Environmental Control Representative

Walt Disney World Co.
Environmental Control Dept.

Environmențai Control Dept

Disney University Suite 200

Phone: 407-824-7129 (8+273+7129)

Fax: 407-824-7455

Mobile: 321-278-6125

Nextel DC:162*134*1071

Email: rich.bumar@disney.com

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]

Sent: Friday, September 14, 2007 9:49 AM

To: Bumar, Rich

Subject: RE: Parallel Review of Title V Permit

I understand it will be o.k. for a parallel review on this one?

From: Sheplak, Scott

Sent: Thursday, September 06, 2007 1:29 PM

To: 'Bumar, Rich'

Subject: Parallel Review of Title V Permit

Re: Walt Disney World Co. - Walt Disney World Resort Complex - Florida Title V Air Operation Permit Renewal, **Project No.:** 0950111-029-AV

We now have an opportunity to expedite Title V permits by doing what is called a "parallel review" in Florida. We have a guidance memorandum on this (see attached Guidance Memorandum DARM-PER-41 dated 11/20/2006).

Based on my review of the subject Title V permit renewal application, this one is a candidate for "parallel review." This process works well where there will be no significant comments. This permit application in my opinion is not controversial and is routine.

Essentially, this new process would save about 1 month of time to issue the FINAL permit. The EPA review period would be performed with the public comment period. The actual permit being publicly noticed would be a "DRAFT/PROPOSED" permit. The PROPOSED permit stage is combined with the DRAFT permit stage hence the reference to a "parallel review." Like before a FINAL permit would be issued after the end of the EPA review period. This renewed permit has a planned future effective date of January 1, 2008. By using the parallel review process, you can receive the FINAL permit well before December 31, 2007.

Please consider this new option and let me know if you are interested in a parallel review for this project.

Sincerely,

9/14/2007

Scott M. Sheplak, P.E. Title V Program Coordinator

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

- file -

Sheplak, Scott

From: Bumar, Rich [Rich.Bumar@disney.com]

Sent: Friday, September 07, 2007 3:58 PM

To: Sheplak, Scott

Subject: RE: Walt Disney World Title V Renewal Issues

Attachments: M5197.pdf

Scott.

The engines are rated at 2550 BHP each. I have attached a spec sheet for the records in case you need it.

Rich

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]

Sent: Friday, September 07, 2007 3:46 PM

To: Bumar, Rich

Subject: RE: Walt Disney World Title V Renewal Issues

For the description in the renewed permit ... What is the horsepower (hp) of the DISC diesel generators? The permit cites 1.75 MW each.

From: Bumar, Rich [mailto:Rich.Bumar@disney.com]

Sent: Monday, August 27, 2007 4:22 PM

To: Sheplak, Scott

Subject: Walt Disney World Title V Renewal Issues

Scott,

I've taken a look at the issues you and I discussed last Thursday regarding the WDW Title V renewal.

CAM Plan

I left Figure 1 out of the plan I sent you with the renewal. The attached PDF file has the plan including Figure 1.

<<0950111 CAM Plan 2007.pdf>>

RICE MACT (40 CFR 63 Subpart DDDDD)

The first thing I looked at when we started the permitting process was the MACT applicability for the DISC diesel generators. The generators are referenced as an "affected source" in § 63.6590(a) which states "An affected source is any existing, new, or reconstructed stationary RICE with a site-rating of more than 500 brake horsepower located at a major source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand." That subsection further defines an "Existing stationary RICE" as "A stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002." The DISC generators qualify as existing RICE because construction began on November 26, 2002. So it would seem that the rule applies to the generators.

However, in the same subsection, part (b)(3) states "A stationary RICE which is an existing spark ignition 2 stroke lean burn (2SLB) stationary RICE, an existing spark ignition 4 stroke lean burn (4SLB) stationary RICE, an existing compression ignition (CI) stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, does not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary." Since the DISC generators are exiting CI stationary RICE, it follows from there in the subpart that no additional requirements are placed on

the units in subpart ZZZZ or subpart A of 40 CFR 63. There are no applicable emissions or operating limitations, testing, notification requirements, recordkeeping or reporting requirements as a result. So I think we are good with the requirements that are currently in our permit.

SPECTRUM®

DETROIT DIESEL

50 Hz



Model: 1750DS-4

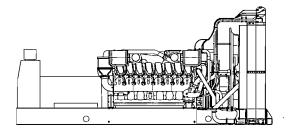
380-4160 V

4 Cycle Diesel



Ratings Range

| | | 00 112 | 30 112 |
|----------|-----|-----------|-----------|
| Standby: | kW | 1480-1750 | 1280-1540 |
| - | kVA | 1850-2188 | 1600-1925 |
| Prime: | kW | 1340-1590 | 1160-1400 |
| | kVA | 1675-1988 | 1450-1750 |



Standard Features

- Your Spectrum® product distributor provides one-source responsibility for the generating system and accessories.
- The generator set and its components are prototype-tested, factory-built, and production-tested.
- At 60 Hz the generator set accepts rated load in one step.
- The 60 Hz generator set engine is certified by the Environmental Protection Agency (EPA).
- A one-year limited warranty covers all systems and components.
 Two-, five-, and ten-year extended warranties are also available.
- · Generator features:
 - The brushless, rotating-field generator has broadrange reconnectability.
 - The pilot-excited, permanent-magnet generator (PMG) provides superior short-circuit capability.
- Other features:
 - Controllers are available for all applications. See controller features inside.
 - The generator set-to-skid mounting on 60 Hz models is direct mounting. The 50 Hz model mounting options include integral vibration isolation or direct mounting with spring isolators.
 - o Electronic engine controls manage the engine.

Generator Ratings

| | | | | 150°C Standby | | 130°C Standby | | 125°C Prime F | | 105°C Prime F | |
|-----------------|-----------|----|----|------------------|------|------------------|--------|------------------|------|------------------|------|
| Generator | Voltage | PH | Hz | kW/kVA | Amps | kW/kVA | Amps | kW/kVA | Amps | kW/kVA | Amps |
| | 220/380 | 3 | 60 | 1480/1850 | 2811 | 1480/1850 | 2811 | 1340/1675 | 2545 | 1340/1675 | 2545 |
| | 240/416 | 3 | 60 | 1620/2025 | 2810 | 1610/2013 | 2793 | 1470/1838 | 2550 | 1460/1825 | 2533 |
| 7114050 | 277/480 | 3 | 60 | 1750/2188 | 2631 | 1750/2188 | 2631 | 1590/1988 | 2391 | 1590/1988 | 2391 |
| 7M4052 | 220/380 | 3 | 50 | 1480/1850 | 2811 | 1420/1775 | 2697 | 1344/1680 | 2552 | 1288/1610 | 2446 |
| | 230/400 | 3 | 50 | 1448/1810 | 2613 | 1348/1685 | 2432 | 1312/1640 | 2367 | 1224/1530 | 2208 |
| | 240/416 | 3 | 50 | 1380/1725 | 2394 | 1280/1600 | 2221 | 1256/1570 | 2179 | 1160/1450 | 2012 |
| | 220/380 | 3 | 60 | 1590/1988 | 3020 | 1590/1988 | 3020 | 1440/1800 | 2735 | 1440/1800 | 2735 |
| | 240/416 | 3 | 60 | 1750/2188 | 3036 | 1750/2188 | 3036 | 1590/1988 | 2758 | 1590/1988 | 2758 |
| ******* | 277/480 | 3 | 60 | 1750/2188 | 2631 | 1750/2188 | 2631 | 1590/1988 | 2391 | 1590/1988 | 2391 |
| 7M4054 | 220/380 | 3 | 50 | 1540/1925 | 2925 | 1528/1910 | 2902 | 1400/1750 | 2659 | 1392/1740 | 2644 |
| | 230/400 | 3 | 50 | 1540/1925 | 2778 | 1540/1925 | 2778 | 1400/1750 | 2526 | 1400/1750 | 2526 |
| | 240/416 | 3 | 50 | 1540/1925 | 2672 | 1496/1870 | 2595 | 1400/1750 | 2429 | 1360/1700 | 2359 |
| | 220/380 | 3 | 60 | 1750/2188 | 3324 | 1750/2188 | 3324 | 1590/1988 | 3020 | 1590/1988 | 3020 |
| | 240/416 | 3 | 60 | 1750/2188 | 3036 | 1750/2188 | 3036 | 1590/1988 | 2758 | 1590/1988 | 2758 |
| | 277/480 | 3 | 60 | 1750/2188 | 2631 | 1750/2188 | 2631 | 1590/1988 | 2391 | 1590/1988 | 2391 |
| 7M4058 | 220/380 | 3 | 50 | 1540/1925 | 2925 | 1540/1925 | 2925 | 1400/1750 | 2659 | 1400/1750 | 2659 |
| | 230/400 | 3 | 50 | 1540/1925 | 2778 | 1540/1925 | 2778 | 1400/1750 | 2526 | 1400/1750 | 2526 |
| | 240/416 | 3 | 50 | 1540/1925 | 2672 | 1540/1925 | 2672 | 1400/1750 | 2429 | 1400/1750 | 2429 |
| 7M4176 | 220/380 | 3 | 60 | 1750/2188 | 3324 | 1750/2188 | 3324 | 1590/1988 | 3020 | 1590/1988 | 3020 |
| 7M4292 | 347/600 | 3 | 60 | 1750/2188 | 2105 | 1750/2188 | - 2105 | 1590/1988 | 1912 | 1590/1988 | 1912 |
| | 2400/4160 | 3 | 60 | 1750/2188 | 304 | 1750/2188 | 304 | 1590/1988 | 276 | 1590/1988 | 276 |
| 7M43 7 0 | 1905/3300 | 3 | 50 | 1540/1925 | 337 | 1520/1900 | 332 | 1400/1750 | 306 | 1384/1730 | 303 |
| | 2400/4160 | 3 | 60 | 1750/2188 | 304 | 1750/2188 | 304 | 1590/1988 | 276 | 1590/1988 | 276 |
| 7M4374 | 1905/3300 | 3 | 50 | 1540/1925 | 337 | 1540/1925 | 337 | 1400/1750 | 306 | 1400/1750 | 306 |

RATINGS: All three-phase units are rated at 0.8 power factor. Standby Ratings: Standby ratings apply to installations served by a reliable utility source. The standby rating is applicable to varying loads for the duration of a power outage. There is no overload capability for this rating. Ratings are in accordance with ISO-3046/1, BS 5514, AS 2789, and DIN 6271. Prime Power Ratings: Prime power ratings apply to installations where utility power is unavailable or unreliable. Al varying load, the number of generator set operating hours is unlimited. A 10% overload capacity is available for one hour in twelve. Ratings are in accordance with ISO-3628/1, overload capacity is available for one hour in twelve. Ratings are in information bulletin (TIS-101) on ratings guidelines for the complete ratings definitions. The generator set manufacturer reserves the right to change the design or specifications without notice and without any obligation or liability whatsoever. GENERAL GUIDELINES FOR DEPARTION: ALTITUDE, bereate 1.5% per 305 m (1000 ft.) levelution above 1006 m (3300 ft.). Maximum altitude capability is 4572 m (15000 ft.) on 60 Hz and 6096 m (20000 ft.) on 50 Hz. TEMPERATURE: Derate 0.4% per 5.5°C (10°F) temperature above 25°C (77°F).

Alternator Specifications

| | | - | |
|----------------------|--|---|--|
| Specifications | | Generator | |
| Туре | | 4-Pole, Rotating Field | |
| | | Brushless, Permanent- Magnet Pilot Exciter | |
| Voltage regulator | | Solid State, Volts/Hz | |
| Insulation: | | NEMA MG1 | |
| Material | | Class H, Synthetic, Nonhygroscopic | |
| Temperature | rise | 130°C, 150°C Standby | |
| Bearing: quantity, | type | 1, Sealed | |
| Coupling | | Flexible Disc | |
| Amortisseur windings | | Full | |
| Rotor balancing | | 125% 60 Hz, 150% 50 Hz | |
| | no-load to full-load ue to temp. variation) | ±0.25% | |
| Unbalanced load o | apability | 100% of Rated Standby Current | |
| One-step load acc | eptance at 60 Hz | 100% of Rating | |
| Peak motor startin | g kVA: | (35% dip for voltages below) | |
| 480 V, 416 V | 7M4052 (4 bus bar) | , , , | |
| 480 V. 416 V | | | |
| 480 V, 416 V | 7M4058 (4 bus bar) | 12500 (60 Hz), 8200 (50 Hz) | |
| 380 V | 7M4176 (4 bus bar) | 5400 (60 Hz) | |
| 600 V | 7M4292 (4 bus bar) | 4200 (60 Hz) | |
| 4160 V, 3300 V | 7M4370 (6 lead) | | |
| 4160 V, 3300 V | 7M4374 (6 lead) | 6200 (60 Hz), 3750 (50 Hz) | |

- Complies with NEMA MG1, IEEE, and ANSI standards for temperature rise and motor starting.
- Complies with ISO 8528-5, Class G3 requirements for transient performance.
- Sustains short-circuit current of up to 300% of the rated current for up to 10 seconds.
- Sustains short-circuit current enabling downstream circuit breakers to trip without collapsing the generator field.
- Self-ventilation, dripproof construction.
- Superior voltage waveform from two-thirds pitch windings and skewed stator.
- Digital solid-state, volts-per-hertz voltage regulator with ±0.25% no-load to full-load regulation.
- Brushless alternator with brushless pilot exciter for excellent load response.

Application Data

Engine

| Engine | • | |
|--|------------------------|-------------------------|
| Engine Specifications | 60 Hz | 50 Hz |
| Manufacturer | Detroit Di | esel/MTU |
| Engine: model | 16V4000 (T163-7K36) | 16V4000 (T163-7K16) |
| Engine: type | | ycle, d, intercooled |
| Cylinder arrangement | 16 | S V |
| Displacement, L (cu. in.) | 65 (3 | 3967) |
| Bore and stroke, mm (in.) | 165 (6.5) x 190 (7.5) | |
| Compression ratio | 13. | 7:1 |
| Piston speed, m/sec. (ft./min.) | 11.4 (2244) | 9.5 (1870) |
| Main bearings: quantity, type | _ | _ |
| Rated rpm | 1800 | 1500 |
| Max.power at rated rpm, kWm (BHP) | 1900 (<u>2550</u>) | 1686 (2260) |
| Cylinder head material | Cast | Iron |
| Crankshaft material | Forged Steel | |
| Valve (exhaust) material | High All | oy Steel |
| Governor: type, make/model | DDEC Elect | ronic Control |
| Frequency regulation, no-load to full-load | Isochr | onous |
| Frequency regulation, steady state | ±0.2 | 25% |
| Frequency | Fix | red |
| Air cleaner type, all models | D | ry |

Exhaust

| Exhaust System | 60 Hz | 50 Hz |
|---|-------------|-------------|
| Exhaust flow at rated kW, m ³ /min. (cfm) | 413 (14590) | 325 (11520) |
| Exhaust temperature at rated kW, dry exhaust, °C (°F) | 407 (765) | 507 (945) |
| Maximum allowable back pressure, kPa (in. Hg) | 5.1 | (1.5) |
| Exhaust outlet size at engine hookup, mm (in.) | 2 @ 2 | 54 (10) |

Engine Electrical

| Engine Electrical System | 60 Hz | 50 Hz |
|--|-------|-------|
| Battery charging alternator: | | |
| Ground (negative/positive) | Neg | ative |
| Volts (DC) | 2 | 4 |
| Ampere rating | 7 | 0 |
| Starter motor rated voltage (DC) | Dua | l, 24 |
| Battery, recommended cold cranking amps (CCA): | | |
| Qty., CCA rating above 0°C (32°F) | 4, 9 | 950 |
| Qty., CCA rating below 0°C (32°F) | 8, 1 | 250 |
| Battery voltage (DC) | 1 | 2 |
| Fuel | | |

Fuel

| Fuel System | 60 Hz | 50 Hz |
|---|--------------|------------|
| Fuel supply line, min. ID, mm (in.) | 25 (1.0) | |
| Fuel return line, min. ID, mm (in.) | 19 (0.75) | |
| Max. lift, engine-driven fuel pump, m (ft.) | - | |
| Max. fuel flow, Lph (gph) | 1045 (276) | 1068 (283) |
| Max. fuel pump restriction with new/used | | |
| filter, kPa (in. Hg) | 20 (6)/- | 41 (12) |
| Fuel filter | 2, Secondary | |
| Recommended fuel | #2 Diesel | |

Lubrication

| Lubricating System | 60 Hz | 50 Hz | |
|---------------------------------------|-----------|--------|--|
| Туре | Full Pre | essure | |
| Oil pan capacity, L (qt.) | 230 (243) | | |
| Oil pan capacity with filter, L (qt.) | 250 (264) | | |
| Oil filter: quantity, type | 4, Spi | n-On | |
| Oil cooler | Water-0 | Cooled | |

| | F | A | X |
|--|---|---|---|
|--|---|---|---|

| FAX | · · · · · · · · · · · · · · · · · · · | Date 9 | 0/7/07 |
|---------------|---------------------------------------|---------------|--------------------------------|
| | | Number of pag | ges including cover sheet 2 |
| то: | Mr. Scott Sheplak | FROM: | Bob Kindle |
| | FDEP, Bureau of Air Regulation | | Reedy Creek Energy Services |
| | | | PO Box 10000 |
| | | | Lake Buena Vista, FL 32830 |
| Phone | 1 (850) 921-9532 | | |
| Fax Phone | 1 (850) 921-9533 | Phone | (407) 824-4184 |
| | | Fax Phone | (407) 824-4169 |
| Re: Acid Rair | n Allowances for Account ID # 0072540 | 032432. | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

| Corrected Reallocation Serial Numbers for: | | | | Willard Smith | | 22-Mar-99 |
|--|--------------|-------|------|---------------|-------------------------|-----------|
| ACCOUNT NAME | ACCOUNT ID | TRAN, | YEAR | | SERIAL BLOCK | AMOUNT |
| Combined Cycle 1 | 007254032432 | 18174 | | 2000 | 1435330 - 1435389 | 60 |
| | | | | 2001 | 1435330 - 1435389 | 60 |
| | | | | 2002 | 1435330 - 1435389 | 60 |
| | | | | 2003 | 1435330 - 1435389 | 60 |
| | | | | 2004 | 1435330 - 1435389 | 60 |
| | | | | 2005 | 1435330 - 1435389 | , 60 |
| | | | | 2006 | 14353301435389 | 60 |
| | | | | 2007 | 1435330 - 1435389 | 60 |
| | | | | 2008 | 1435330 - 1435389 | 60 |
| | | | | 2009 | 1435330 - 1435389 | .60 |
| | | | | 2010 | 798390 - 798449 | 60 |
| | | | | 2011 | 798390 - 798449 | 60 |
| | | | | 2012 | 798390 - 798449 | 60 |
| | • | | | 2013 | 798390 - 798449 | 60 |
| | | | | 2014 | 798390 - 798449 | 60 |
| | | | | 2015 | 798390 - 798449 | 60 |
| | | | | 2016 | 798390 - 798449 | 60 |
| | | | | 2017 | 798390 - 798449 | 60 |
| | | | | 2018 | 798390 - 798449 | 60 |
| | | | | 2019 | 798390 - 798449 | 60 |
| | | • | | 2020 | 798390 - 798449 | . 60 |
| , | | | | 2021 | 798390 - 7 98449 | 60 |
| | | | | 2022 | 798390 - 798449 | 60 |
| | | | | 2023 | 798390 - 798449 | 60 . |
| | | | | 2024 | 798390 - 798449 | 60 |
| | | | | 2025 | 798390 - 798449 | 60 |
| | | | | 2026 | 798390 - 798449 | 60 |
| | | | | 2027 | 798390 - 798449 | 60 |
| | | | | 2028 | 798390 - 798449 | 60 |
| | | | | | | |

- file -

From:

Bumar, Rich [Rich.Bumar@disney.com]

Sent:

Wednesday, August 29, 2007 7:04 AM

To:

Sheplak, Scott

Subject:

RE: Walt Disney World Title V Renewal Issues

Attachments: CAM Plan 2007.doc

Scott,

Here's the CAM Plan in MS Word.

Regarding the Epcot Diesel Generators (EU's 079 and 080): According to my records, construction began on them in 1986 which would make them existing units in the RICE MACT. Following the same analysis as the DISC generators, there would be no applicable (additional) emissions or operating limitations, testing, notification requirements, recordkeeping or reporting requirements from 40 CFR 63 Subpart DDDDD.

Rich

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]

Sent: Monday, August 27, 2007 4:32 PM

To: Bumar, Rich

Subject: RE: Walt Disney World Title V Renewal Issues

Thank you; I will review asap. Good work!

Please send a word version of the CAM Plan language.

From: Bumar, Rich [mailto:Rich.Bumar@disney.com]

Sent: Monday, August 27, 2007 4:22 PM

To: Sheplak, Scott

Subject: Walt Disney World Title V Renewal Issues

Scott,

I've taken a look at the issues you and I discussed last Thursday regarding the WDW Title V renewal.

CAM Plan

I left Figure 1 out of the plan I sent you with the renewal. The attached PDF file has the plan including Figure 1.

<<0950111 CAM Plan 2007.pdf>>

RICE MACT (40 CFR 63 Subpart DDDDD)

The first thing I looked at when we started the permitting process was the MACT applicability for the DISC diesel generators. The generators are referenced as an "affected source" in § 63.6590(a) which states "An affected source is any existing, new, or reconstructed stationary RICE with a site-rating of more than 500 brake horsepower located at a major source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand." That subsection further defines an "Existing stationary RICE" as "A stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002." The DISC generators qualify as existing RICE because construction began on November 26, 2002. So it would seem that the rule applies to the generators.

However, in the same subsection, part (b)(3) states "A stationary RICE which is an existing spark ignition 2 stroke lean burn 8/29/2007

(2SLB) stationary RICE, an existing spark ignition 4 stroke lean burn (4SLB) stationary RICE, an existing compression ignition (CI) stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, does not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary." Since the DISC generators are exiting CI stationary RICE, it follows from there in the subpart that no additional requirements are placed on the units in subpart ZZZZ or subpart A of 40 CFR 63. There are no applicable emissions or operating limitations, testing, notification requirements, recordkeeping or reporting requirements as a result. So I think we are good with the requirements that are currently in our permit.

Gas Turbine NSPS

Regarding NSPS for the combustion turbine, these issues were addressed in the latest permit application. Each applicable requirement was listed in the supplemental material submitted with the application. However, I can summarize the submittal here.

On February 18, 2005, the United States Environmental Protection Agency (EPA) proposed a New Source Performance Standard (NSPS) Subpart KKKK for gas turbines. This proposed regulation is not applicable to the WDW gas turbine as the binding contractual obligation 1 for the gas turbine was signed on October 29, 2004, and the cancellation fees reached 10% on December 29, 2004. Overall total project cancellation costs reached \$922,144.002 prior to publication of the proposed rule. Therefore, for the purposes of NSPS, based on guidance from EPA, this gas turbine project is considered an existing source and not subject to the proposed NSPS Subpart KKKK because it commenced construction prior to the February 18, 2005 Federal Register proposal.

40 CFR 60 Subpart A General Provisions 60.2 Definitions include the following definitions for Existing facility and Commenced:

Existing facility means, with reference to a stationary source, any apparatus of the type for which a standard is promulgated in this part, and the construction or modification of which was commenced before the date of proposal of that standard; or any apparatus which could be altered in such a way as to be of that type.

Commenced means, with respect to the definition of new source in section 111(a)(2) of the Act, that an owner or operator has undertaken a continuous program of construction or modification or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification.

Numerous EPA guidance letters have further defined commenced and contractual obligation as it relates to the date a facility is considered existing for the applicability of a new or proposed regulation.

In the July 18, 1972, letter3 from Mr. Edward E. Reich Chief, Enforcement Proceedings Branch of the EPA to Mr. Richard E. Bell Manager, Environmental Department of the Hawaiian Electric Company, Inc. pertaining to Part 60 Subpart A, the title was Construction Commencement Date and the Abstract section read as follows:

"Does a letter of intent to purchase components for a proposed facility constitute commencing construction?

Once a letter of intent to purchase is issued, there is usually a period during which the order can be cancelled at no cost to the purchaser. After the date upon which the order cannot be cancelled without incurring a cancellation charge, the purchaser has a contractual obligation."

In the October 1, 1979, letter4 titled Commencement from Mr. Edward E. Reich Director, Division of Stationary Source Enforcement of EPA to Mr. Richard P. Cool Engineer, Energy and Utility Project of CARG pertaining to Part 60, Subparts A & D, the Abstract section read as follows:

"For the purposes of Subpart D, when is a contractual obligation entered into?

A contractual obligation is entered into on the date a cancellation fee for cancellation of the order for a boiler becomes effective."

In the body of the same letter Mr. Reich stated "A contractual obligation is entered into on the date a cancellation fee for cancellation of the order for a boiler becomes effective. This determination has been made previously by the Agency, in particular, in a letter to the Hawaiian Electric Company, Inc., on July 18, 1972"

RCID has only one facility where the GE LM6000 gas turbine could be installed as detailed in the subject air construction permit

application and is therefore financially committed to this particular site. In addition to the almost one million dollars in contractual cancellation fees RCID will lose if this project is cancelled, RCID will also face up to seven million dollars in additional future power purchase costs to replace the planned power output. RCID has committed itself financially and otherwise to a particular site for a particular facility to the point that relocation is not possible and a delay or substantial modification would be severely disruptive and result in a substantial loss.

In summary, for the purposes of NSPS, based on guidance from EPA, the gas turbine project is considered an existing source and not subject to the proposed NSPS Subpart KKKK because it commenced construction prior to the February 18, 2005 Federal Register proposal.

GAS Turbine MACT (40 CFR 63 Subpart YYYY)

The following analysis was performed during the original permit application and was included in the permit application in 2005. Basically, the GT isn't subject to any part of the MACT except for requirements of initial notification if and when the unit becomes subject to the rule.

On August 18, 2004, EPA stayed the effectiveness of NESHAP Subpart YYYY for lean premix and diffusion flame gas turbine. The relevant provision of the rule that stays the effectiveness for such units is as follows.

40 CFR 63.6095(d) Stay of Standards for Gas-Fired Subcategories.

If you start up a new or reconstructed stationary combustion turbine that is a lean premix gas-fired stationary combustion turbine or diffusion flame gas-fired stationary combustion turbine as defined by this subpart, you must comply with the Initial Notification requirements set forth in Sec. 63.6145, but need not comply with any other requirement of this subpart until EPA takes final action to require compliance and publishes a document in the Federal Register.

Chapter 40, Code of Federal Regulations, Part 63, National Emission Standards for Hazardous Air Pollutants for Source Categories. [Rule 62-204.800(11), F.A.C.]

- (a) Definitions. For the purposes of subsection 62-204.800(10), F.A.C., the definitions contained in the various provisions of 40 CFR Part 63 adopted herein shall apply, except that the term, "Administrator," when used in any provisions of 40 CFR Part 63 that is delegated to the Department by the U.S. Environmental Protection Agency, shall mean the Secretary or the Secretary's designee.
- (b) Standards Adopted. The following National Emission Standards for Hazardous Air Pollutants contained in 40 CFR Part 63, revised as of July 1, 2001, or later as specifically indicated, are adopted and incorporated by reference:
 - 78. 40 CFR 63, Subpart YYYY, Stationary Combustion Turbines; promulgated March 5, 2004, at 69 FR 10511; amended August 18, 2004, at 69 FR 51184; except that the Secretary is not the Administrator for purposes of 40 CFR 63.6170(c)(1) through (5).
- (c) The National Emission Standards for Hazardous Air Pollutants adopted by reference in this rule shall be controlling over other standards in the air pollution rules of the Department, except that any emissions limiting standard contained in or determined pursuant to the air pollution rules of the Department which is more stringent than one contained in a National Emission Standard, or which regulates pollutants or emissions units not regulated by an applicable National Emission Standard, shall apply.
- (d) General Subparts Adopted. The following general subparts of 40 CFR Part 63, revised as of July 1, 2001, or later as specifically indicated, are adopted and incorporated by reference.
 - 1. 40 CFR Part 63, Subpart A, General Provisions; amended February 27, 2002, at 67 FR 9156; amended April 5, 2002, at 67 FR 16581; amended February 18, 2003, at 68 FR 7706; amended April 21, 2003, at 68 FR 19375; amended May 20, 2003, at 68 FR 27645; amended May 23, 2003, at 68 FR 28605; amended May 27, 2003, at 68 FR 28774; amended May 28, 2003, at 68 FR 31745; amended May 29, 2003, at 68 FR 32171; amended May 30, 2003, at 68 FR 32585; amended November 13, 2003, at 68 FR 64431; amended December 19, 2003, at 68 FR 70959; amended January 2, 2004, at 69 FR 129; amended February 3, 2004 at 69 FR 5038; amended April 19, 2004, at 69 FR 20967; amended April 22, 2004, at 69 FR 21905; amended April 26, 2004, at 69 FR 22601; amended July 30, 2004, at 69 FR 45943; except that the Secretary is not the Administrator for purposes of 40 CFR 63.5(e), 40 CFR 63.5(f), 40 CFR 63.6(g), 40 CFR 63.6(h)(9), 40 CFR 63.6(j), 40 CFR 63.13, and 40 CFR 63.14.
 - 2. 40 CFR Part 63, Subpart B, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j); amended April 5, 2002, at 67 FR 16581; is adopted and incorporated by reference, subject to the following provisions.

- a. The "effective date of Section 112(g)(2)(B)" as defined in 40 CFR 63.41 shall be July 1, 1997.
- b. The "Notice of MACT Approval" as defined in 40 CFR 63.41 shall be the air construction permit.
- c. The "permitting authority" as defined in 40 CFR 63.41 shall be the Department.
- d. In lieu of the administrative procedures for review of the Notice of MACT Approval as set forth in 40 CFR 63.43(f)(1) through (5), the Department will follow the permit processing procedures of Rule 62-4.055, F.A.C.
- e. In lieu of the opportunity for public comment on the Notice of MACT Approval as set forth in 40 CFR 63.43(h), the Department will provide opportunity for public comment on the Notice of MACT Approval pursuant to Rule 62-210.350, F.A.C.
- f. The Notice of MACT Approval shall become effective upon issuance of the air construction permit by the Department.
- 3. 40 CFR Part 63, Subpart C, List of Hazardous Air Pollutants, Petitions Process, Lesser Quantity Designations, Source Category List, revised as of July 1, 2004; amended November 29, 2004, at 69 FR 69320.
- 4. 40 CFR Part 63, Subpart D, Compliance Extensions for Early Reductions of Hazardous Air Pollutants, except any notice required to be published by the Department shall be prepared by the Department and published by the applicant with proof of publication submitted to the Department.
- 5. 40 CFR Part 63, Subpart E, Approval of State Programs and Delegation of Federal Authorities; Section 63.90, Program Overview, only.
- (e) Appendices Adopted. The following appendices of 40 CFR Part 63, revised as of July 1, 2001, or later as specifically indicated, are adopted and incorporated by reference:
 - 1. Appendix A, Test Methods.
 - 2. Appendix B, Sources Defined for Early Reduction Provisions.
 - 3. Appendix C, Determination of the Fraction Biodegraded (Fbio) in a Biological Treatment Unit.
 - 4. Appendix D, Alternative Validation Procedure for EPA Waste and Wastewater Methods.
 - 5. Appendix E, Monitoring Procedure for Non-thoroughly Mixed Open Biological Treatment Systems at Kraft Pulp Mills Under Unsafe Sampling Conditions.

40 CFR 63 Subpart A - General Provisions

[Source: Federal Register dated 3/5/04]

The permittee shall comply with the applicable general provisions identified in Table 7 of 40 CFR 63 Subpart YYYY.

§ 63.1 Applicability.

Additional terms defined in Sec. 63.6175.

§ 63.2 Definitions.

Additional terms defined in Sec. 63.6175.

- § 63.3 Units and abbreviations.
- § 63.4 Prohibited activities and circumvention.
- § 63.5 Preconstruction review and notification requirements.

§ 63.6 Compliance with standards and maintenance requirements.

Subpart YYYY does not contain opacity or visible emission standards.

§ 63.7 Performance testing requirements.

Subpart YYYY contains performance test dates at Sec.63.6110.

Subpart YYYY contains performance test dates at Sec.63.6110.

Subpart YYYY specifies test methods at Sec. 63.6120.

§ 63.8 Monitoring requirements.

Subpart YYYY contains specific requirements for monitoring at Sec.63.6125.

Subpart YYYY does not require COMS.

Subpart YYYY does not require COMS.

Averaging periods for demonstrating compliance are specified at Secs. 63.6135 and 63.6140.

§ 63.9 Notification requirements.

Subpart YYYY does not contain opacity or VE standards.

Notifications for sources not conducting performance tests are due 30 days after completion of performance evaluations.

§ 63.10 Recordkeeping and reporting requirements.

Applies for CO standard if using RATA alternative.

Subpart YYYY does not contain opacity or VE standards.

Subpart YYYY does not require reporting of startup, shutdown, or malfunctions.

Subpart YYYY does not require COMS.

§ 63.11 Control device requirements.

§ 63.12 State authority and delegations.

§ 63.13 Addresses of State air pollution control agencies and EPA Regional Offices.

§ 63.14 Incorporations by reference.

§ 63.15 Availability of information and confidentiality.

Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines

[Source: Federal Register dated 3/5/04]

40 CFR 63.6080 What is the purpose of subpart YYYY?

40 CFR 63.6085 Am I subject to this subpart?

40 CFR 63.6090 What parts of my plant does this subpart cover?

8/29/2007

40 CFR 63.6092 Are duct burners and waste heat recovery units covered by subpart YYYY?

40 CFR 63.6095 When do I have to comply with this subpart?

40 CFR 63.6100 What emission and operating limitations must I meet?

40 CFR 63.6105 What are my general requirements for complying with this subpart?

40 CFR 63.6110 By what date must I conduct the initial performance tests or other initial compliance demonstrations?

40 CFR 63.6115 When must I conduct subsequent performance tests?

40 CFR 63.6120 What performance tests and other procedures must I use?

40 CFR 63.6125 What are my monitor installation, operation, and maintenance requirements?

40 CFR 63.6130 How do I demonstrate initial compliance with the emission and operating limitations?

40 CFR 63.6135 How do I monitor and collect data to demonstrate continuous compliance?

40 CFR 63.6140 How do I demonstrate continuous compliance with the emission and operating limitations?

40 CFR 63.6145 What notifications must I submit and when?

40 CFR 63.6150 What reports must I submit and when?

40 CFR 63.6155 What records must I keep?

40 CFR 63.6160 In what form and how long must I keep my records?

40 CFR 63.6165 What parts of the General Provisions apply to me?

40 CFR 63:6170 Who implements and enforces this subpart?

40 CFR 63.6175 What definitions apply to this subpart?

As previously specified, EPA stayed the effectiveness of NESHAP Subpart YYYY for lean premix gas-fired stationary combustion turbines and diffusion flame gas-fired stationary combustion turbines. For purposes of this rule, the affected unit is considered a diffusion flame gas-fired combustion turbine. Until EPA takes final action to require compliance and publishes a document in the Federal Register, only the Initial Notification requirements as set forth in Sec. 63.6145 apply. The unit is permitted to fire up to 475 hours of distillate oil per year as a restricted alternate fuel. An oxidation catalyst controls organic compounds. The following tables reflect this applicability.

Tables to Subpart YYYY of Part 63.

As stated in § 63.6100, you must comply with the following emission limitations:

TABLE 1 TO SUBPART YYYY OF PART 63. EMISSION LIMITATIONS

For each new or reconstructed stationary combustion turbine described in \S 63.6100 which is You must meet the following emission limitations

3. a diffusion flame gas-fired stationary combustion turbine as defined in this subpart, or Limit the concentration of formaldehyde to 91 ppbvd or less at 15 percent O2.

As stated in § 63.6100 and § 63.6140, you must comply with the following operating limitations:

TABLE 2 TO SUBPART YYYY OF PART 63. OPERATING LIMITATIONS

For You must

1. each stationary combustion turbine that is required to comply with the emission limitation for formaldehyde and is using an oxidation

catalyst. maintain the 4-hour rolling average of the catalyst inlet temperature within the range suggested by the catalyst manufacturer. As stated in § 63.6120, you must comply with the following requirements for performance tests and initial compliance demonstrations:

TABLE 3 TO SUBPART YYYY OF PART 63. REQUIREMENTS FOR PERFORMANCE TESTS AND INITIAL COMPLIANCE DEMONSTRATIONS

You must Using According to the following requirements

- a. demonstrate formaldehyde emissions meet the emission limitations specified in Table 1 by a performance test initially and on an annual basis AND Test Method 320 of 40 CFR part 63, appendix A; ASTM D6348–03 provided that %R as determined in Annex A5 of ASTM D6348–03 is equal or greater than 70% and less than or equal to 130%; or other methods approved by the Administrator. Formaldehyde concentration must be corrected to 15 percent O2, dry basis. Results of this test consist of the average of the three 1 hour runs. Test must be conducted within 10 percent of 100 percent load.
- b. select the sampling port location and the number of traverse points AND Method 1 or 1A of 40 CFR part 60, Appendix A § 63.7(d)(1)
- (i). If using an air pollution control device, the sampling site must be located at the outlet of the air pollution control device.
- c. determine the O2 concentration at the sampling port location AND Method 3A or 3B of 40 CFR part 60, Appendix A. Measurements to determine O2 concentration must be made at the same time as the performance test.
- d. determine the moisture content at the sampling port location for the purposes of correcting the formaldehyde concentration to a dry basis. Method 4 of 40 CFR part 60, appendix A or Test Method 320 of 40 CFR part 63, Appendix A, or ASTM D6348–03. Measurements to determine moisture content must be made at the same time as the performance test.

Measurements to determine moisture content must be made at the same time as the performance test.

As stated in §§ 63.6110 and 63.6130, you must comply with the following requirements to demonstrate initial compliance with emission limitations:

TABLE 4 TO SUBPART YYYY OF PART 63. INITIAL COMPLIANCE WITH EMISSION LIMITATIONS

For the You have demonstrated initial compliance if

Emission limitation for formaldehyde. the average formaldehyde concentration meets the emission limitations specified in Table 1. As stated in §§ 63.6135 and 63.6140, you must comply with the following requirements to demonstrate continuing compliance with operating limitations:

TABLE 5 OF SUBPART YYYY OF PART 63.—CONTINUOUS COMPLIANCE WITH OPERATING LIMITATIONS

For each stationary combustion turbine complying with the emission limitation for formaldehyde. You must demonstrate continuous compliance by

1. with an oxidation catalyst—continuously monitoring the inlet temperature to the catalyst and maintaining the 4-hour rolling average of the inlet temperature within the range suggested by the catalyst manufacturer.

As stated in § 63.6150, you must comply with the following requirements for reports:

TABLE 6 OF SUBPART YYYY OF PART 63.—REQUIREMENTS FOR REPORTS

If you own or operate a You must According to the following requirements

- 1. stationary combustion turbine which must comply with the formaldehyde emission limitation. report your compliance status semiannually, according to the requirements of \S 63.6150.
- 3. a lean premix gas-fired stationary combustion turbine or a diffusion flame gas-fired stationary combustion turbine as defined by this subpart, and you use any quantity of distillate oil to fire any new or existing stationary combustion turbine which is located at the same major source. Report
- (1) the number of hours distillate oil was fired by each new or existing stationary combustion turbine during the reporting period,
- (2) the operating limits provided in your federally enforceable permit, and any deviations from these limits, and
- (3) any problems or errors suspected with the meters. annually, according to the requirements in § 63.6150.

I hope this helps. If you need any additional information, please let me know.

Rich Bumar, PE

Sr. Environmental Control Representative

8/29/2007

Walt Disney World Co.

Environmental Control Dept.

Disney University Suite 200

Phone: 407-824-7129 (8+273+7129)

Fax: 407-824-7455

Mobile: 321-278-6125

Nextel DC:162*134*1071

Email: rich.bumar@disney.com



RECEIVED

JUL 16 2007

BUREAU OF AIR REQULATION

July 13, 2007

Ms. Patty Adams FDEP Bureau of Air Regulation 2600 Blair Stone Road Tallahassee, Florida 32399-2400

RE:

Title V Permit Renewal PE Signature Document

Application number: 1578-1

Facility ID 0950111- Walt Disney World Co.

Dear Ms. Adams:

Please find enclosed the Professional Engineer Signature Document for the above referenced facility's Title V permit renewal. The application was submitted electronically on July 4, 2007.

If you have any questions or need any further information, please call me at 407-824-7129.

Sincerely,

Rich Bumar, PE

Sr. Environmental Control Representative

Enclosure

Electronic Permit Submittal and Processing System (EPSAP) Professional Engineer Signature Document

"This document is signed and sealed to secure the data in this permit application and any attached files that were submitted electronically as described in Florida Department of Business and Professional Regulation, Board of Professional Engineers, Procedures for Signing and Sealing Electronically Transmitted Plan, Specifications, Reports or other Documents, Rule 61G15-23.003., F.A.C.."

EPSAP Application Number: 1578-1 **Facility Identification Number:** 0950111

Facility Owner/Company Name: WALT DISNEY WORLD COMPANY

Purpose of Application:

Title V air operation permit renewal.

Signature File Created: 7/3/2007 6:04:06 PM

| File Description | Authentication Code | | | | | |
|---|--|--|--|--|--|--|
| Submitted Application Data | 5AF0733BEC4D5C2FA80AAAA0001C8177D4959D4D | | | | | |
| Uploaded Facility Documents: | | | | | | |
| 0950111 Insignificant 2007.pdf | 79C4727B695FF83AE4496F73DF4BC5DEEA50F186 | | | | | |
| Facility PLOT PLAN.pdf | 3EE93E8F9782A170F96013EEEFE39814B19F45CB | | | | | |
| WDW Acid Rain renewal application.pdf | D5F58D9103769B3FC43A655AC231A9B53381E669 | | | | | |
| 0950111 Title V renewal Compliance Statement.pdf | 30D1019DD68C7E4F89D69749F677E7AA8829665E | | | | | |
| Attachment C-prevention of unconfined PM emissions .pdf | D11879C3C78EA478106D85067DDE40EF47DD7269 | | | | | |
| 0950111 Renewal Requested Changes pdf | 6DF0647B7536B194983F69EC52134516E3B5F786 | | | | | |
| Uploaded Emissions Unit Documents: | | | | | | |
| Temp Boiler emissions.xls | 09FD30675EBBD5C35419E9E91628E2D8856A4F82 | | | | | |
| WDW Temporary Boiler Analysis of Applicable Requir ements.pdf | 9A17F964F83D5C353D264735FE0942792943FCA9 | | | | | |
| WDW Temporary Boiler Analysis of Applicable Requirements.pdf | 9A17F964F83D5C353D264735FE0942792943FCA9 | | | | | |
| Temp Boiler emissions.xls | 09FD30675EBBD5C35419E9E91628E2D8856A4F82 | | | | | |
| WDW Temporary Boiler Analysis of Applicable Requirements.pdf | 9A17F964F83D5C353D264735FE0942792943FCA9 | | | | | |
| Temp Boiler emissions.xls | 09FD30675EBBD5C35419E9E91628E2D8856A4F82 | | | | | |
| WDW Acid Rain renewal application.pdf | D5F58D9103769B3FC43A655AC231A9B53381E669 | | | | | |
| 0950111 CAM Plan 2007 pdf | 4B4D059F0351A9CEB96A90BE5E4E24C6C1046325 | | | | | |
| 0950111 Emergency Generators 2007 update.xls | 6DBF632ADD16FFA526275C22ABD189116A761EB2 | | | | | |
| | | | | | | |
| Final Signature File | EC22680A5F57CF287222ABEE628832D9B209A016 | | | | | |

Professional Engineer (PE): RICH BUMAR License No: 55375

(sign and affix PE seal below)

onopiak, oook

From: Shine, Caroline

Sent: Monday, July 09, 2007 7:53 AM

To: Sheplak, Scott

Cc: Linero, Alvaro; Bradner, James; Parker, Wanda

Subject: RE: Compliance Review of Title V Air Operation Permit Renewal Application

Scott,

There are no outstanding compliance or enforcement actions with this facility.

Caroline Shine, Environmental Manager Air Enforcement, Compliance and Ambient Air Monitoring Florida Department of Environmental Protection, Central District 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803 407-893-3336, Suncom 325-3336

> -----Original Message-----From: Sheplak, Scott

Sent: Friday, July 06, 2007 1:54 PM

To: Shine, Caroline **Cc:** Linero, Alvaro

Subject: Compliance Review of Title V Air Operation Permit Renewal Application

Re: Compliance Review of Title V Air Operation Permit Renewal Application

Application Number 1578-1

Walt Disney World Company Facility ID No.: 0950111

On July 4, 2007, our office received the subject application via Electronic Permit Submittal Processing System (EPSAP). You should be able to access the application through the EPSAP system.

Each applicant for a Title V permit is required to sign a certification of compliance. Each applicant is also required to report the compliance status of each emissions unit. Any non-compliance at the time of application and/or during the processing of the application requires a compliance plan to be submitted. The applicant certified compliance in the application.

Please review this facility's status with your compliance and enforcement staff. Please notify me via email or hard-copy **either**:

- a. there are no outstanding compliance or enforcement actions with this facility or
- b. the following outstanding compliance and enforcement issues exist (please list).

Please review the compliance status of this facility and send us your written comments within 30 days (no later than August 6th). Thank you for your cooperation.



From: Cascio, Tom

Sent: Tuesday, July 10, 2007 8:53 AM

To: Friday, Barbara

Cc: Adams, Patty; Linero, Alvaro; Sheplak, Scott

Subject: RE: A new application was submitted in EPSAP on FDEP

Hi Barb -- if this is the renewal it should go to Scott.

Tom

----Original Message----

From: Friday, Barbara

Sent: Tuesday, July 10, 2007 8:50 AM

To: Cascio, Tom

Cc: Adams, Patty; Linero, Alvaro

Subject: FW: A new application was submitted in EPSAP on FDEP

Tom,

The subject EPSAP Application has been logged in and you have been assigned to process this project.

The project number is 0950111-029-AV.

Barbara

----Original Message----

From: Oracle Account [mailto:oracle@epic30.dep.state.fl.us]

Sent: Wednesday, July 04, 2007 10:30 AM

To: undisclosed-recipients

Subject: A new application was submitted in EPSAP on FDEP

A new application was submitted in EPSAP for the following facility:

Application Number: 1578-1

Facility ID: 0950111

Facility Name: WALT DISNEY WORLD COMPANY

At your earliest convenience, please log-in to the EPSAP application located at

http://appprod.dep.state.fl.us/epsap_eng/default.asp

to begin the application review process.

Please note the following uploaded files included with this application:

6 Facility File(s):

COMPLIANCE REPORT AND PLAN (0950111 Title V renewal Compliance Statement.pdf)

FACILITY PLOT PLAN (Facility PLOT PLAN.pdf)

LIST OF INSIGNIFICANT ACTIVITIES (0950111 Insignificant 2007.pdf)

OTHER FACILITY INFORMATION (WDW Acid Rain renewal application.pdf)

PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER (Attachment C-

prevention of unconfined PM emissions.pdf)

REQUESTED CHANGES TO CURRENT TITLE V AIR OPERATION PERMIT (0950111 Renewal Requested Changes.pdf)

9 Emission Unit File(s):

EU 101: OTHER EMISSIONS UNIT INFORMATION (0950111 Emergency Generators 2007 update.xls)

EU 88: ACID RAIN PART (FORM NO. 62-210.900(1)(a)) (WDW Acid Rain renewal

application.pdf)

EU 88: OTHER EMISSIONS UNIT INFORMATION (0950111 CAM Plan 2007.pdf)

New EU (63 MMBTU/HR TEMPORARY UNREGULATED BOILER): IDENTIFICATION OF APPLICABLE

REQUIREMENTS (WDW Temporary Boiler Analysis of Applicable Requirements.pdf)

New EU (63 MMBTU/HR TEMPORARY UNREGULATED BOILER): OTHER EMISSIONS UNIT INFORMATION (Temp Boiler emissions.xls)

New EU (30 MMBTU/HR TEMPORARY UNREGULATED BOILER #1): IDENTIFICATION OF APPLICABLE REQUIREMENTS (WDW Temporary Boiler Analysis of Applicable Requirements.pdf)

New EU (30 MMBTU/HR TEMPORARY UNREGULATED BOILER #1): OTHER EMISSIONS UNIT INFORMATION (Temp Boiler emissions.xls)

New EU (30 MMBTU/HR TEMPORARY UNREGULATED BOILER #2): IDENTIFICATION OF APPLICABLE REQUIREMENTS (WDW Temporary Boiler Analysis of Applicable Requirements.pdf)

New EU (30 MMBTU/HR TEMPORARY UNREGULATED BOILER #2): OTHER EMISSIONS UNIT INFORMATION (Temp Boiler emissions.xls)