

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

**RECEIVED**

**OCT 28 1997**

**BUREAU OF  
AIR REGULATION**

CERTIFIED MAIL

P 173 656 036

In the Matter of an  
Application for Permit by:  
Walt Disney World Company  
P.O. Box 10,000  
Lake Buena Vista, Florida 32830-1000  
Attention: William A. O'Toole,  
Senior Vice President

Orange County - AP  
Four Dry Cleaning Units  
DEP File Number 0950111-012-AC

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Central District is issuing this Intent to Issue for the reasons stated below.

The applicant, Walt Disney World Company, applied on July 18, 1997 to the Department of Environmental Protection for a construction permit to allow an increase in operating hours and to incorporate applicable emission limiting standards at four dry cleaning units which are sources of air emissions. The facility is located at the North Service Area, Laundry Bldg., Walt Disney World Resort Complex, Orange County, Florida.

The Department has permitting jurisdiction under Section 403 Florida Statutes (F.S.) and Chapter 62-4.210 and Chapter 62-210.300 Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that an operating permit in accordance with Rule 62-210.300(2)(b), F.A.C., is required for the proposed work.

Pursuant to Section 403.815, F.S. and DEP Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The Notice shall be published one time only within thirty (30) days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department, at 3319 Maguire Boulevard, Suite 232, Orlando, FL 32803-3767 within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department 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 of the Florida Statutes, or a party requests mediation as an alternative remedy under section 120.573 before the deadline for filing a petition. Choosing

mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any other person must be filed within fourteen days of publication of the public notice or within 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 of the Florida Statutes, 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 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department 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 Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department'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 Department's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department'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 Department 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 Department'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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute.

The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

- (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;
- (b) A statement of the preliminary agency action;
- (c) A statement of the relief sought; and
- (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

- (a) The names, addresses, and telephone numbers of any persons who may attend the mediation;
- (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
- (c) The agreed allocation of the costs and fees associated with the mediation;
- (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;
- (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
- (f) The name of each party's representative who shall have authority to settle or recommend settlement; and
- (g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 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.

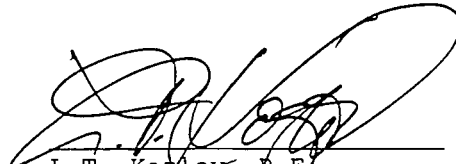
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying 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 EPA 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.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to section 403.111, F.S.), all relevant supporting materials, and all other materials available to the Department that are relevant to the permit decision. In addition any person may send written comments on the proposed permitting action. All requests and comments should be sent to this office at the address referenced above to the attention of Mr. Alan Zahm (phone no. 407-893-3335) referencing Permit File No. 0970054-001-AF. All comments received within 30 days of receipt of this Intent To Issue will be considered in the Department's final determination.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management  
3319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803-3767  
(407) 894-7555

DATE: 10-24-97

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

Debra Jones Oct 24, 1997  
Clerk Date

*az*

LTK/jtt

Enclosures: Draft Permit  
Notice of Intent

Copies furnished to:

Bruce Mitchell, DARM ✓

CERTIFICATE OF SERVICE

This is to certify that this INTENT TO ISSUE and all copies were mailed before  
the close of business on 10/27/97 to the listed persons by  
H. Stauffer

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department'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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the Department's proposed action, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department of Environmental Protection a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, FL 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:  
settle or recommend settlement; and

- (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;
- (b) A statement of the preliminary agency action;
- (c) A statement of the relief sought; and
- (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

- (a) The names, addresses, and telephone numbers of any persons who may attend the mediation;
- (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
- (c) The agreed allocation of the costs and fees associated with the mediation;
- (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;
- (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
- (f) The name of each party's representative who shall have authority to settle or recommend settlement; and
- (g) The signatures of all parties or their authorized representatives.

State Of Florida  
Department Of Environmental Protection  
Notice Of Intent To Issue Permit  
Page Three

As provided in section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department of Environmental Protection must enter a order incorporating the agreement of the parties. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

Any person may send written comments on the proposed permitting action. All requests and comments should be sent to the Department of Environmental Protection at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803 to the attention of Mr. Alan Zahm (phone no. 407-893-3335) referencing Permit File No. 0970054-001-AF. All comments received within 30 days of receipt of this Intent To Issue will be considered in the Department's final determination.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

## NOTICE OF PERMIT

CERTIFIED MAIL  
P 173 656 037

Walt Disney World Company  
Post Office Box 10,000  
Lake Buena Vista, Florida 32830-1000

Attention: William A. O'Toole,  
Senior Vice President

Orange County - AP  
Four Dry Cleaning Units

Dear Mr. O'Toole:

Enclosed is Permit Number 0950111-012-AC to construct the above referenced source issued pursuant to Section(s) 403.087, Florida Statutes.

Any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; 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 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

**DRAFT**  
\_\_\_\_\_  
L.T. Kozlov, P.E.  
Program Administrator  
Air Resources Management

Date: \_\_\_\_\_







# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

Permittee:  
Walt Disney World Company  
Post Office Box 10,000  
Lake Buena Vista, Florida 32830-1000

Atten: William A. O'Toole,  
Senior Vice President

I.D. Number: 0950111  
Permit Number: 0950111-012-AC  
Date of Issue:  
Expiration Date: October 30, 2002  
County: Orange  
Latitude/Longitude:  
28° 24' 30"N/81° 34' 55"W  
Project: Four Dry Cleaning Units

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

**DRAFT**

The permittee may construct four dry cleaning units as follows:

<u>E.U./Facility I.D.</u>	<u>Brief Description</u>	<u>Manufacturer</u>
<u>North Service Area Dry Cleaning Plant</u>		
-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

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 perchloroethylene dry cleaning operation is subject to 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

The facility is located at the North Service Area, Laundry Bldg., Walt Disney World Resort Complex, Orange County, Florida.

General Conditions are attached to be distributed to the permittee only.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, 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 acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup 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.

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

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

GENERAL CONDITIONS:

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

Permittee:  
Walt Disney World Company  
  
Atten: William A. O'Toole,  
Senior Vice President

I.D. Number: 0950111  
Permit Number: 0950111-012-AC  
Expiration Date: October 30, 2002  
County: Orange

**SPECIFIC CONDITIONS:**

OPERATING CONDITIONS

1. Each emission unit is permitted to operate continuously, per the application. [Rule 62-210.200, (PTE), F.A.C.]
2. Each pollution control device must be properly operated and maintained [Rule 62-210.300(2)(a)2, F.A.C.]. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly [Rule 62-210.650, F.A.C.].
3. The Compliance Plan submitted on October 6, 1997, is incorporated by reference.  
Rule 62-213.440, F.A.C.

Standards

4. 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 CFR 63.322(a)(1) & (2)]
5. 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)]
6. 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)]
7. 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)]

Permittee:  
Walt Disney World Company  
  
Atten: William A. O'Toole,  
Senior Vice President

I.D. Number: 0950111  
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Expiration Date: October 30, 2002  
County: Orange

8. 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)]
  
9. 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)]
  
10. (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)]
  
11. 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)]
  
12. 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)]

Permittee:  
Walt Disney World Company  
Atten: William A. O'Toole,  
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13. 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

14. 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  $7.2^{\circ}\text{C}$  ( $45^{\circ}\text{F}$ ). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of  $7.2^{\circ}\text{C}$  ( $45^{\circ}\text{F}$ ) to an accuracy of  $\pm 1.1^{\circ}\text{C}$  ( $\pm 2^{\circ}\text{F}$ ).
  - (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  $11.1^{\circ}\text{C}$  ( $20^{\circ}\text{F}$ )
    - (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  $0^{\circ}\text{C}$  ( $32^{\circ}\text{F}$ ) to  $48.9^{\circ}\text{C}$  ( $120^{\circ}\text{F}$ ) to an accuracy of  $\pm 1.1^{\circ}\text{C}$  ( $\pm 2^{\circ}\text{F}$ ).
    - (ii) The difference between the inlet and outlet temperatures shall be calculated weekly from the measured values.  
[40 CFR 63-323(a)(1) & (2)]
15. 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:

Permittee:  
Walt Disney World Company

I.D. Number: 0950111  
Permit Number: 0950111-012-AC  
Expiration Date: October 30, 2002  
County: Orange

Atten: William A. O'Toole,  
Senior Vice President

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

16. 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)]

17. 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 CFR 63.324(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 CFR 63.323(d)(1), (2) & (3)]



Permittee:  
Walt Disney World Company  
  
Atten: William A. O'Toole,  
Senior Vice President

I.D. Number: 0950111  
Permit Number: 0950111-012-AC  
Expiration Date: October 30, 2002  
County: Orange

Recordkeeping and Reporting Requirements

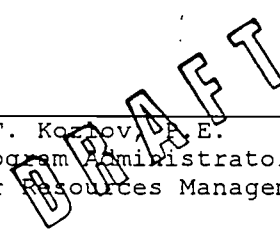
18. Each permittee of a dry cleaning facility shall submit an initial report signed by a responsible official before a notary public certifying that the information provided in the initial report is accurate and true to the Permitting authority within 90 calendar days after September 22, 1993, which 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
  - (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) thru (6)]
19. 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)]
20. 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;

Permittee:  
Walt Disney World Company  
Atten: William A. O'Toole,  
Senior Vice President

I.D. Number: 0950111  
Permit Number: 0950111-012-AC  
Expiration Date: October 30, 2002  
County: Orange

- (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)]
21. 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)]
22. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to this office.  
[Rule 62-210.370(3)(a), F.A.C.].

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
\_\_\_\_\_  
L.T. Kozlov, Ph.D.  
Program Administrator  
Air Resources Management

Issued: \_\_\_\_\_

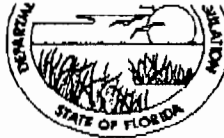
Post-It™ brand fax transmittal memo 7671		# of pages	4
To	Bruce Mitchell	From	J. Turner
Co.	FDEP	Co.	FDEP
Dept.		Phone #	
Fax #		Fax #	

DE

ATION

**ST. JOHNS RIVER DISTRICT**

3318 MAGUIRE BOULEVARD  
SUITE 232  
ORLANDO, FLORIDA 32803-3767



**BOR GRAHAM**  
GOVERNOR

**VICTORIA J. TSHINKEL**  
SECRETARY

**ALEX SENKEVICH**  
DISTRICT MANAGER

**Permittee:**  
Edward B. Crowell  
Vice President, Facilities  
Walt Disney World Company  
Post Office Box 40  
Lake Buena Vista, Florida 32830

**I. D. Number:**  
Permit/Certification  
Number: AC48-61957  
Date of Issue:  
Expiration Date: 8-1-83  
County: Orange  
Latitude/Longitude:  
28°25'36"/81°34'29"  
Section/Township/Range:  
Project: Dry Cleaning  
Operation, Unit #1

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can construct a dual bed carbon adsorber unit Model 1500 to control perchloroethylene emissions from this Mullematic 60 day of dry machine Number #1. A computer punch card operation is to be utilized so that Multmatic Machine #2 would never be operating in the drying cycle at the same as Machine #1.

This machine is the Northernmost unit along the East Wall in W.D.W. Laundry Building in the north service area in the City of Bay Lake, Florida, Walt Disney World Complex.

UTM: 443650 East  
UTM: 3144460 North

Note: Unit #1 only

PERMITTEE:  
Edward B. Crowell

I. D. Number:  
Permit/Certification Number:  
AC48-61957  
Date of Issue:  
Expiration Date: 8-1-83

SPECIFIC CONDITIONS:

1. This office (Florida Department of Environmental Regulation, Air Permitting, Orlando) shall be notified at least ten (10) days in advance of the compliance tests so that we can witness them.
2. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last test is completed.
3. This dry cleaning operation must be tested for Solvent Stills:
4. Solvent Stills emissions may be tested using the ASTM D 322-80 Method: "Gasoline Diluent in Used Gasoline Engine Oil by Distillation".
5. The activated carbon is to be replaced should its effectiveness deteriorate.
6. The following Control Technology and Emission Standards, as per Rule 17-2.650(1)(f)18., F.A.C. are part of this permit.
  - (i) The owner or operator of a perchloroethylene dry cleaning operation subject to Rule 17-2.650(1)(f)18 shall:
    - (A) Vent the entire dryer exhaust through a carbon adsorption system; and
    - (B) Emit no more than 100 ppmv of Volatile organic compounds from the dryer control device before dilution; and
    - (D) Reduce the volatile organic compounds from all solvent stills to 132 pounds (60 Kilograms) or less per 220 pounds (100 kilograms) of wet waste material.
7. To prevent saturation of the carbon bed, the carbon adsorption equipment shall be desorbed after drying 700 pounds of dry-cleaning material.
8. The carbon bed shall be desorbed with a minimum steam pressure of 10 psi for a minimum of 30 minutes.

*ok CME  
Equip on list*

**PERMITTEE:**

Edward B. Crowell

**I. D. Number:**Permit/Certification Number:  
AC48-61957

Date of Issue:

Expiration Date: 8-1-83

**SPECIFIC CONDITIONS:**

9. The carbon bed shall be fan dried for at least 15 minutes after desorption.
10. The rated air flow capacity of the carbon adsorption equipment shall be equal to or greater than the unrestricted exhaust flow rate of all equipment venting to the adsorber.
11. No bypass to the atmosphere shall exist during adsorption.
12. Lint filters and screens shall be cleaned periodically to allow free flow of gases.
13. Reclaimer dryer and/or dry-to-dry machine dampers shall be periodically checked for leaks.
14. Records of the weight of materials cleaned before each steam stripping shall be maintained.
15. Perceptible leaks in the following components shall be repaired within 3 working days or, if replacement parts are necessary, a purchase order for those parts must be initiated within 3 working days.

Hose connections, unions, couplings, and valves  
Machine door gasket and seating  
Filter head gasket and seating  
Pumps  
Base tanks and storage containers  
Water separators  
Filter sludge recovery  
Distillation unit  
Divertor valves  
Saturated lint from lint basket  
Cartridge filters

PERMITTEE:  
Edward B. Crowell

I. D. Number:  
Permit/Certification Number:  
AC48-61957  
Date of Issue:  
Expiration Date: 8-1-83

SPECIFIC CONDITIONS:

*OK  
CMP*

16. No objectionable odors will be allowed, as per Rule 17-2.620(2), F.A.C.

17. There shall be no discharges of liquid effluents or contaminated runoff from the plant site without approval from this office.

18. This permit expires August 1, 1983 and application is to be made to the appropriate DER office 60 days prior to the permit expiration.

19. The required proof of compliance with all of the applicable standards for dry cleaning contained in Rule 17-2.650(1)(f)18, F.A.C. must be submitted to this office within 45 days of the carbon adsorption unit installation.

Issued this 6th day of April 1983

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

*fr* Thomas E. Hennrich  
DISTRICT MANAGER  
A. Senkevich, P.E.

8 Pages Attached

Post-it® Fax Note	7671	Date	9/18/97	# of pages	4
To	Bruce Mitchell	From	Rich Bumar		
Co./Dept	FDEP	Co.	Walt Disney World		
Phone #		Phone #	407-827-4524		
Fax #	850-922-6979	Fax #	407-827-2774		

September 18, 1997

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

**DRAFT**

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 Senior Vice President Lee Schmutde, who is the Responsible Official for this facility.

Bruce Mitchell  
 Page 2  
 September 18, 1997

**DRAFT**

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

Applicable Section	Description	In Compliance		Comment
		Yes	No	
§ 63.320 (a)	Applies to PERC dry cleaning facilities	✓		
§ 63.320 (b)	Provides compliance dates for units built after December 9, 1991	✓		
§ 63.320 (c)	Provides compliance dates for units built before December 9, 1991			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			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 gallons in exclusive dry-to-dry facility or	✓		
§ 63.320 (g)(2)	Designation as Major Source if PERC consumption is greater than 1,800 gallons for mixed facilities			N/A
§ 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	✓		
§ 63.321	Definitions			N/A
§ 63.322 (a)	Requires compliance with (a)(1) or (a)(2) and (a)(3) of this section	✓		
§ 63.322 (a)(1)	Specifies the use of a refrigerated condenser or equivalent	✓		
§ 63.322 (a)(2)	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)(2)	Elimination of emissions from transfer of articles between washers and dryers			N/A
§ 63.322 (b)(3)	Specifies the use of a carbon adsorber			N/A
§ 63.322 (c)	Machine doors must be kept closed immediately following removal of articles and at all other times	✓		
§ 63.322 (d)	Operation of machines must be according to manufacturer's recommendations	✓		
§ 63.322 (e)(1)	Refrigerated condenser must be operated as to not vent vapors to the atmosphere while drum is rotating	✓		
§ 63.322 (e)(2)	Refrigerated condenser must be monitored in accordance with § 63.323(a)(1)	✓		
§ 63.322 (e)(3)	Refrigerated condenser shall be operated with a diverter valve which prevents 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) of this section.	✓		
§ 63.322 (f)(1)	Prohibits venting of PERC gas vapors to atmosphere until washer door is opened	✓		
§ 63.322 (f)(2)	Requires monitoring according to § 63.323(a)(2)	✓		
§ 63.322 (f)(3)	Prohibits use of same condenser coil for a washer that is used by other systems			N/A



Bruce Mitchell  
Page 3  
September 18, 1997

# DRAFT

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

Bruce Mitchell  
 Page 4  
 September 18, 1997

§ 63.324 (c)	Applicable to former area sources that now exceed are source thresholds:			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	✓		
§ 63.324 (d)(2)	Calculations of yearly PERC consumption	✓		
§ 63.324 (d)(3)	Leak inspection dates and leak inspection results	✓		
§ 63.324 (d)(4)	Repair dates and records resulting from leak inspections	✓		
§ 63.324 (d)(5)	Temperature sensor monitoring results and dates	✓		
§ 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.

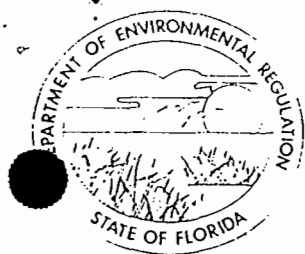
Sincerely,

Rich Bumar  
 Environmental Control Representative  
 Environmental Control

**DRAFT**

By Certified Mail

cc: Bob Beaver  
 Roger Horne  
 Mike Morrow  
 Armando Rodriguez



# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

Permittee:  
Walt Disney World Company  
Post Office Box 10,000  
Lake Buena Vista, Florida 32830-1000

Attention: Edward B. Crowell  
Vice President, Facilities Support

I. D. Number:  
Permit/Certification  
Number: A048-155895  
Date of Issue:  
Expiration Date: 11/10/94  
County: Orange  
Latitude/Longitude:  
28°25'36"N/81°34'29"W  
UTM: 17-443.65 KmE; 3144.46 KmN  
Project: Dry Cleaning Operation,  
Units No. 1, 2, 3, and 4

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate Dry Cleaning Units No. 1, 2, 3, and 4. The emissions are controlled by a Spencer dual bed carbon adsorber Model 1500, Serial Number 190 that is approximately 99% efficient. A computer punch card control operation is utilized so that Multimatic Machine #1 would never be operating in the drying cycle at the same time as Multimatic Unit 2 and Unit 3 would never be operating in the drying cycle at the same time as Unit #4.

These sources are located along the East Wall in the Walt Disney World Laundry Building in the north service area at Bay Lake, Orange County, Florida.

General Conditions are attached to be distributed to the permittee only.

PERMITTEE:  
Walt Disney World Company  
  
Attention: Edward B. Crowell  
Vice President, Facilities Support

I. D. Number:  
Permit/Certification Number:  
AO48-155895  
Date of Issue:  
Expiration Date: 11/10/94

SPECIFIC

CONDITIONS:

1. No objectionable odors will be allowed, as per Rule 17-2.620(2), F.A.C.
2. There shall be no discharges of liquid effluents or contaminated runoff to surface or ground water without prior approval from this office.
3. This permit does not preclude compliance with any applicable local permitting requirements and regulations.
4. This source is permitted to operate 3640 hours/year. *60% increase*
5. Each source is subject to the applicable control technology and emission limitations of Rule 17-2.600(12)(a) or (b), F.A.C.
6. To demonstrate compliance with specific condition no. 5, the source must be inspected at yearly intervals from the date of March 1, 1989 and a report submitted to the Department.
7. This office (Florida Department of Environmental Regulation, Air Permitting, Orlando) shall be notified at least fifteen (15) days in advance of the inspections so that we can witness them (Rule 17-2.700(2)(a)5, F.A.C.).
8. This plant is required to operate within 90 to 100 percent of permitted capacity during the compliance tests.
9. 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 17-2.700(7)(a),(b) and (c), F.A.C.).
10. Solvent Stills emissions may be tested using the ASTM D 322-80 Method: "Gasoline Diluent in Used Gasoline Engine Oil by Distillation".
11. To prevent saturation of the carbon bed, the carbon adsorption equipment shall be desorbed after drying 700 pounds of dry cleaning material.
12. The carbon bed shall be desorbed with a minimum steam pressure in the range of 2.5 to 10 psi for a minimum of 30 minutes.
13. The carbon bed shall be fan dried for at least 15 minutes after desorption.
14. The rated air flow capacity of the carbon adsorption equipment shall be equal to or greater than the unrestricted exhaust flow rate of all equipment venting to the adsorber.

PERMITTEE:  
Walt Disney World Company  
Attention: Edward B. Crowell  
Vice President, Facilities Support

I. D. Number:  
Permit/Certification Number:  
AO48-155895  
Date of Issue:  
Expiration Date: 11/10/94

SPECIFIC

CONDITIONS:

15. No bypass to the atmosphere shall exist during adsorption.
16. Lint filters and screens shall be cleaned periodically to allow free flow of gases.
17. Reclaimer dryer and/or dry-to-dry machine dampers shall be periodically checked for leaks.
18. Records of the weight of materials cleaned before each steam stripping shall be maintained.
19. Perceptible leaks in the following components shall be repaired within 3 working days or, if replacement parts are necessary, a purchase order for those parts must be initiated within 3 working days.

Hose connections, unions, couplings, and valves  
Machine door gasket and seating  
Filter head gasket and seating  
Pumps  
Base tanks and storage containers  
Water separators  
Filter sludge recovery  
Distillation unit  
Divertor valves  
Saturated lint from lint basket  
Cartridge filters

20. Each calendar year on or before March 1, submit for each source, an Annual Operations Report DER Form 17-1.202(6) for the preceding calendar year in accordance with Rule 17-4.14, F.A.C.
21. An operation permit renewal must be submitted at least 60 days prior to the expiration date of this permit (Rule 17-4.09, F.A.C.).

ISSUED 11-21-88

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*cmc* *Gayle*  
A. Alexander  
Deputy Assistant Secretary  
3319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803



# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

*PEARCE LORETHY LEWIS*

## NOTICE OF PERMIT

*30-ORL-48-0111*

Walt Disney World Company  
Post Office Box 10,000  
Lake Buena Vista, Florida 32830-1000

Attention: Edward B. Crowell, Vice President  
Facilities Support

Orange County - AP  
Dry Cleaning Operation, Units No. 1, 2, 3, and 4

Dear Mr. Crowell:

Enclosed is Permit Number **AO48-155895**, dated 11-21-88, to operate the above referenced sources, issued pursuant to Section 403.087, Florida Statutes. *no wdw 13 sandblaster*

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing), unless the right to petition has been waived. The petition must conform to the requirements of Chapters 17-103 F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within that time constitutes a waiver of any right such person has to an administrative determination pursuant to Section 120.57, Florida Statutes.

The petition shall contain the following information; (a) the name, address and telephone number of each petitioner, the applicant's name and address, the Department 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 department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the department to take with respect to the department's action or proposed action.

This Order (Permit) is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraph. Upon the timely filing of a petition this Permit will not be effective until further Order of the Department.

Any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 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 30 days from the date the Final Order is filed with the Clerk of the Department.

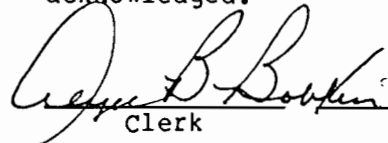
Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*cmc* 

A. Alexander  
Deputy Assistant Secretary  
3319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803

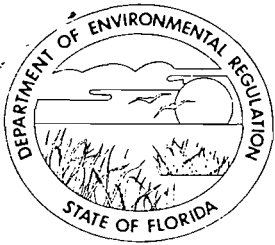
FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
Section 120.52, Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

 11/21/89  
Clerk Date

*ADB*  
AA/jtj *87-*

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 11-21-89 to the listed persons, by D. Jones.



# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

**Permittee:**

Walt Disney World Company  
Post Office Box 10,000  
Lake Buena Vista, Florida 32830-1000

Attention: Edward B. Crowell  
Vice President, Facilities Support

**I. D. Number:**

Permit/Certification  
Number: AO48-155895  
Date of Issue:  
Expiration Date: 11/10/94  
County: Orange  
Latitude/Longitude:  
28°25'36"N/81°34'29"W  
UTM: 17-443.65 KmE; 3144.46 KmN  
Project: Dry Cleaning Operation,  
Units No. 1, 2, 3, and 4

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate Dry Cleaning Units No. 1, 2, 3, and 4. The emissions are controlled by a Spencer dual bed carbon adsorber Model 1500, Serial Number 190 that is approximately 99% efficient. A computer punch card control operation is utilized so that Multimatic Machine #1 would never be operating in the drying cycle at the same time as Multimatic Unit 2 and Unit 3 would never be operating in the drying cycle at the same time as Unit #4.

These sources are located along the East Wall in the Walt Disney World Laundry Building in the north service area at Bay Lake, Orange County, Florida.

**General Conditions are attached to be distributed to the permittee only.**



PERMITTEE:

Walt Disney World Company

Attention: Edward B. Crowell  
Vice President, Facilities Support

I. D. Number:

Permit/Certification Number:

AO48-155895

Date of Issue:

Expiration Date: 11/10/94

SPECIFIC

CONDITIONS:

1. No objectionable odors will be allowed, as per Rule 17-2.620(2), F.A.C.
2. There shall be no discharges of liquid effluents or contaminated runoff to surface or ground water without prior approval from this office.
3. This permit does not preclude compliance with any applicable local permitting requirements and regulations.
4. This source is permitted to operate 3640 hours/year.
5. Each source is subject to the applicable control technology and emission limitations of Rule 17-2.600(12)(a) or (b), F.A.C.
6. To demonstrate compliance with specific condition no. 5, the source must be inspected at yearly intervals from the date of March 1, 1989 and a report submitted to the Department.
7. This office (Florida Department of Environmental Regulation, Air Permitting, Orlando) shall be notified at least fifteen (15) days in advance of the inspections so that we can witness them (Rule 17-2.700(2)(a)5, F.A.C.).
8. This plant is required to operate within 90 to 100 percent of permitted capacity during the compliance tests.
9. 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 17-2.700(7)(a),(b) and (c), F.A.C.).
10. Solvent Stills emissions may be tested using the ASTM D 322-80 Method: "Gasoline Diluent in Used Gasoline Engine Oil by Distillation".
11. To prevent saturation of the carbon bed, the carbon adsorption equipment shall be desorbed after drying 700 pounds of dry cleaning material.
12. The carbon bed shall be desorbed with a minimum steam pressure in the range of 2.5 to 10 psi for a minimum of 30 minutes.
13. The carbon bed shall be fan dried for at least 15 minutes after desorption.
14. The rated air flow capacity of the carbon adsorption equipment shall be equal to or greater than the unrestricted exhaust flow rate of all equipment venting to the adsorber.

PERMITTEE:  
Walt Disney World Company  
  
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ISSUED 11-21-88

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*emc* *Jay A. Alexander*  
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