From:	Bumar, Rich
To:	Holtom, Jonathan; Costello, Martin
Cc:	Garrido, Jose R.; Rodriguez, Armando; Schmudde, Lee
Subject:	RE: CAIR form for EU 088
Date:	Monday, November 05, 2012 12:54:28 PM
Attachments:	WDW Generators and other RICE units edited 11-04.xlsx

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Jon and Marty,

Do you need a hard copy of the CAIR form or will a scanned and emailed version do? I am having the DR sign it today at 2 pm.

Also, I have included what I think should be the final update of the emergency generator list. I have identified which NSPS condition set, if any, is applicable to each engine.

I expect to find out no later than the end of the day tomorrow if we are planning to reclassify the DISC generators. The plan I have proposed to the facility management at DISC is to install emissions controls and parametric monitoring by May 3, 2013 but reclassify the engines as emergency generators by that date. I just haven't gotten the buy-in from everyone yet, but our RO is for it.

Our operation plan would be to take care of any planned maintenance that will take longer than would be allowed under the rules before May 3 so we can use our allowable hours as designated under our current permit conditions but have them switch to emergency status on May 3, 2013. We have a one-time 80 hour outage planned to replace a bunch of breakers and distribution boards. We need to complete that job before we reclassify them so that the hours do not count against the 50 hour non-emergency use limit for emergency generators. Can that be written into the permit? We have determined that our annual planned maintenance should never exceed 50 hours otherwise. For this option to work, we would need some language in the permit something like this:

> Permitting note: Any unplanned interruption of power or critical power component failure which requires the facility to use generator power will be considered a power interruption as referenced in the definition of Emergency Stationary RICE as found in § 63.6675 of Chapter 40 of the Code of Federal Regulations.

Our management needs some kind of reassurance that an unplanned usage of the engines because of the loss of all or part of the critical power supply system would be considered "emergency operation". For example, if one of the parallel circuits in the UPS fails, they switch to generator power. Even though it would be physically possible to run on only one circuit, since part of their critical power supply is compromised, they switch to generator power.

As Melanie King reiterated to me several times, the EPA considers generator operation during planned maintenance non-emergency operation. That was the only specific criteria she gave us. Therefore, operation of the generators due to an unplanned critical component failure that requires switching to generator power would be emergency operation. If we can get that language in our permit, we should be able to reclassify them on May 3.

Thanks,

Rich

Please note the new phone number below.

Rich Bumar, P.E.
Environmental Engineer
Walt Disney World Resort • Environmental Control Dept. • Maingate Office Complex #2235

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From: Holtom, Jonathan [mailto:Jonathan.Holtom@dep.state.fl.us]
Sent: Friday, November 02, 2012 6:39 PM
To: Bumar, Rich
Cc: Costello, Martin
Subject: CAIR form for EU 088

Hi Rich,

Could you please email me a copy of your current CAIR form signed by your DR? Your application references one previously submitted in 2008, but newly signed and certified forms should be submitted with every renewal. Thanks for your help!

Jon Holtom, P.E., CPM
Florida Department of Environmental Protection
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Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.