From: Bumar, Rich
To: Costello, Martin
Subject: RE: 0950111-032-AV Draft Proposed Permit 5 pm version.docx
Date: Wednesday, November 07, 2012 12:04:54 PM

That's reasonable- we already are doing semi-annual monitoring reports so we can tie the NESHAP, compliance and monitoring reports together in to one report.

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

Phone: 407-390-5003 (tie line 8+298) • Fax: 407-938-7322/7325 and **407-390-5227** *• Mobile:321-278-6125 • DC:162*134*1071*

From: Costello, Martin [mailto:Martin.Costello@dep.state.fl.us]
Sent: Wednesday, November 07, 2012 12:01 PM
To: Bumar, Rich
Subject: RE: 0950111-032-AV Draft Proposed Permit 5 pm version.docx

Ok, we added the "unless requested by the department" to condition B.15, and it appears that E.21 has that language except for the last row, which is a NESHAP requirement for semi-annual reports- so you have to do these for non-emergency engines. That's one of the benefits to the DISC engines being emergency—no semi-annual compliance reports….

Martin Costello
Professional Engineer
Florida Department of Environmental Protection (DEP)
Division of Air Resource Management (DARM)
Office of Permitting and Compliance (OPC)
Power Plants Section
Phone: (850) 717-9040

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

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From: Bumar, Rich [mailto:Rich.Bumar@disney.com]
Sent: Wednesday, November 07, 2012 11:47 AM
To: Costello, Martin
Cc: Kindle, Robert; Godwin, Ed; Garcia, Jose M; Potusky, Elaine
Subject: RE: 0950111-032-AV Draft Proposed Permit 5 pm version.docx

Hi Marty,

In the May submittal, we had some engines duplicated and some that had been removed.

So the new count is correct.

We are all furiously reviewing the permit.

One thing I see in specific condition B.15 is the requirement for quarterly malfunction reports for the laundry boilers. Specific condition E.21 for the Epcot generators requires quarterly malfunction reports "if requested by DEP". Both conditions reference Appendix RR, item 3 as the basis of the requirement.

As I read RR.3, it seems that we must report a malfunction that results in excess emissions to the department and, if the Department requests a detailed report, we would submit that in a quarterly report. I don't read that as a requirement for quarterly malfunction reporting on a regular basis. Can we get some clarification on that?

Rich

Rich Bumar, P.E.
Environmental Engineer
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From: Costello, Martin [mailto:Martin.Costello@dep.state.fl.us]
Sent: Wednesday, November 07, 2012 11:34 AM
To: Bumar, Rich
Subject: RE: 0950111-032-AV Draft Proposed Permit 5 pm version.docx

Rich,

The total engine count is as follows according to the most recent spreadsheet you sent:

WDW	diesel	100
WDW	SI	8 (all natural gas I think)
Exempt		31
RC emergency		30
RC EPCOT		2
RC DISC		4

Total 175 of which 167 are diesel

Your request that came with the application has a higher number (191): see below and comment on this…..

Requested Changes to Current Title V Air Operation Permit
2012 Renewal
Permit 0950111-031-AV
List of requested changes to current Title V Air Operation Permit:
1. Update the company name to Walt Disney Parks and Resorts U.S., Inc.
2. Update the list of emergency generators listed in emissions unit ID 166 STANDBY/
EMERGENCY GENERATORS FIRING #2 FO OR NG. The list is included with the additional information for that emissions unit and had been changed to
reflect the 191 emergency generators at WDW.
3. Change the number of units in EU 120 (DISC Building generators) from 3 to 4.
The 4th unit is identical to the 3 original generators and was added in April 2008.
There has been no increase in emissions and the current permitted fuel usage limit
and fuel specifications would are still being applied to the bank of generators. These generators will be subject to RICE MACT in May 2013 and will be evaluated for emissions controls or reclassification as emergency generators later
in this calendar year.
4. Add two insignificant spray booths to the WDW list of insignificant activities:
Scenic Shop spray booth and Disney Florist Spray Booth. The scenic shop spray
booth's potential emissions for VOC are approximately 200 lb/yr (0.1 tpy). The
potential emissions from the floral spray booth for VOC are approximately 350
lb/yr (0.18 tpy).
5. Remove the emissions limits for CO from the ECEP Generators (EUs 079 and
080)

Martin Costello
Professional Engineer
Florida Department of Environmental Protection (DEP)
Division of Air Resource Management (DARM)
Office of Permitting and Compliance (OPC)
Power Plants Section
Phone: (850) 717-9040

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From: Bumar, Rich [mailto:Rich.Bumar@disney.com]
Sent: Wednesday, November 07, 2012 11:25 AM

To: Costello, Martin
Cc: Kindle, Robert
Subject: RE: 0950111-032-AV Draft Proposed Permit 5 pm version.docx

Hey Marty,

So far I have not seen any glaring issues. I think Bob Kindle had some concerns about Specific Condition A.23.

Sulfur Content Compliance. Sampling the fuel oil sulfur content shall be conducted in accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90 or other equivalent methods after approval of the Department. For each subsequent fuel delivery, the permittee shall maintain a permanent file of the certified fuel sulfur analysis from the fuel vendor. At the request of a Compliance Authority, the permittee shall perform additional sampling and analysis for the fuel sulfur content. [Permit No. 0950111-026-AC, Specific Condition 7.]

Bob is concerned that the "other equivalent methods after approval of the Department" may limit us if an equivalent ASTM method is used but not approved by the Department. Would we need approval individually, or would that be something the Department approves across the board and that language is intended to cover any newer methods that were not listed specifically in the permit?

I also see that the reference to this is a specific condition in an AC permit. Is that set in stone after that? Would we need to modify the AC permit to do so?

Rich

Rich Bumar, P.E.
Environmental Engineer
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From: Costello, Martin [mailto:Martin.Costello@dep.state.fl.us]
Sent: Tuesday, November 06, 2012 5:50 PM
To: Bumar, Rich
Subject: 0950111-032-AV Draft Proposed Permit 5 pm version.docx

Most recent draft

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.