From:	Holtom, Jonathan
To:	Costello, Martin
Subject:	(Archived w/ Attachments) FW: EU"s and permits
Date:	Monday, October 29, 2012 8:36:54 AM
Attachments:	image001.jpg Boardwalk AC permit.pdf Laundry Boiler AC permits.pdf

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This is a response from Rich to my email sent out Friday afternoon. Just FYI since he did not copy you on the response and for you to also store in case I lose it.

Jon

From: Bumar, Rich [mailto:Rich.Bumar@disney.com]
Sent: Friday, October 26, 2012 5:29 PM
To: Holtom, Jonathan
Subject: RE: EU's and permits

Jon,

I replaced some of the information in the table about which you had questions and I added some comments. I highlighted them in green. I do not recall any specific code for the dry cleaning machine so I created one.

The "Boilers" at the Boardwalk resort, BDW 1& 2 do not produce steam- they only produce hot water. I confirmed this by speaking with the technician from Thermal-Tech that works on the units. Like we discussed, there was a lot of confusion back in the day and everything was called a boiler whether or not it produced steam. Now that we know this for sure, can we move them to the unregulated category?

One thing I was hoping to get incorporated into the permit is to aggregate the emissions from all painting operations, including architectural painting, into one EU. The mass balance equation would be the sum of the emissions from all paint purchased during the year minus the mass of paint disposed of during the year. We can get the purchase records from our vendors and we know our waste disposal amounts from the reports we get from our hazardous waste disposal company. We can track both of these very accurately amounts so our total VOC emissions from all painting would be much more accurate than it is now. Marty and I discussed this and it seemed feasible.

AC48-271849 was for the Boardwalk boilers/hot water generators. The laundry boilers were permitted under two ACs: 158650 and 156350 back in 1989.

If you need anything else, please let me know.

Rich Bumar, P.E.
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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, October 26, 2012 4:15 PM
To: Bumar, Rich
Cc: Costello, Martin
Subject: EU's and permits

Rich, as just discussed:

New Summary table of emissions units included in the draft renewal permit. Please

check for obvious errors in numbers, locations, descriptions or your identification codes.

Subsection B. Summary of Emissions Units.

EU ID No.	Identification Code	Brief Description	Location
Walt Disney World Resort Complex (Regulated Units)			
020	LBB-1a	Laundry Boiler #1	North Service Area (NSA)
022	LBB-1c	Laundry Boiler #3	NSA
090	BDW-1 & 2	2 Hot Water Boilers (I think that now that we know they only produce hot water and no steam, I think they should be unregulated.)	Boardwalk Resort
101	RICE Units	120 Stand-by/Emergency Generators Firing #2 FO, NG or LP Gas	Various
112	DAK-1	Crawford Model CB800 Animal Crematory	Animal Kingdom Necropsy Building
121	LDC-1	Dry Cleaning Machine	NSA Laundry
Reedy Creek Energy Services (Regulated Units)			
079	Epcot DG-1	2.5 MW Diesel Generator	Epcot
080	Epcot DG-2	2.5 MW Diesel Generator	Epcot
088	CEP-1	CCCT with natural gas fired Heat Recovery Steam Generator	Reedy Creek Energy Services
120	*RICE get codes from spreadsheet*	Three Diesel Electric Generators Serving the DISC Building	DISC Building
Unregulated Emissions Units and Activities (see Appendix U, List of Unregulated Emissions Units and/or Activities)			
Walt Disney World Resort Complex (Unregulated Units)			
006	NSA-18	NSA Boat Maintenance & Painting Facility	Central Shops NSA
007	NSA-1 thru 7, 11, 12, 14 thru 16	NSA Central Shops Building	Central Shops NSA
014	NSA-8	NSA Lofting Building Paint Spray Booth (PSB)	Central Shops NSA
015	NSA-9 & 10	NSA CSBA[JH1] (Central Shops Building Annex)	Central Shops NSA
035	GFR2 thru 18	16 Hot Water Heaters	Disney's Grand Floridian Hotel
053	STB-1, 2A, 2B1, 2B2, 3 thru 8	10 Hot Water Heaters	Disney's Hollywood Studios (This park has been renamed)
061	MGM-10	PSB	Disney's Hollywood Studios (This park has been renamed)
062	BVC-1	PSB	Buena Vista Construction
063	LBV-1 & 2	PSBs	Facilities Services (These units are currently out of service due to closing of the paint department for that area.)
065	VM-3	PSB	Downtown Disney Service Building (this is the same location, the area has been renamed)
066	LBV-3	PSB	Facilities Services (This unit was moved to the facilities' services area, although it has been out of service for the last 2 years due to the paint department closing in that area.)
067	YBC-3	PSB	Yacht & Beach Club
068	EP-1 & 2	PSBs	EPCOT ~~Center~~ (It's just Epcot now)
070	EP-3	PSB	EPCOT ~~Center~~
072	LAU-1 & 2	2 Laundry Thermal Oil Heaters	Administrative Area Laundry
075	MK-1	PSB	Magic Kingdom
091	BDW-3 thru 10	8 Hot Water Heaters	Boardwalk Resort
092	MK-3	Hot Water Heater	Magic Kingdom
093	MK-2	PSB	Magic Kingdom

094	BR-1	PSB	Boardwalk Resort
095	COS-1 thru 37	37 Hot Water Heaters	Coronado Springs Resort
102	COS-41	PSB	Coronado Springs Resort
103	DAKU-1 thru 51	51 Hot Water Heaters	Disney's Animal Kingdom
113	ASR-2 thru 108	107 Hot Water Heaters	All Star Resort
114	ASR-1	PSB	All Star Resort
115	DAKU-52	1.075 MMBtu/hr boiler firing NG	Tree of Life Boiler
118	NSA-20	Monorail Trains PSB	NSA Monorail Building
119	DAKU-53	Maintenance PSB	Disney's Animal Kingdom
Reedy Creek Energy Services (Unregulated Units)			
076	Epcot HWG-1 thru 3	3 Hot Water Heaters	Epcot
081	CEP-2	Hot Water Heater	Reedy Creek Energy Services
083	BB-1 thru 5	5 Hot Water Heaters	Blizzard Beach

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List

List of emissions units included in the EPSAP application:

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type
101	191 STAND-BY/EMERGENCY GENERATORS FIRING #2 FO, NG OR LP GAS	
21	NSA LAUNDRY: BOILER #2 (LBB-1B)	
20	NSA LAUNDRY: BOILER #1 (LBB-1A)	
79	RCID/EPCOT: 2.5 MW DIESEL GENERATOR (EPCOT DG-1)	ACM1
22	NSA LAUNDRY: BOILER #3 (LBB-1C)	
80	RCID/EPCOT: 2.5 MW DIESEL GENERATOR (EPCOT DG-2)	ACM1
88	CCCT WITH NATURAL GAS FIRED HRSG (CEP-1)	
120	Four Diesel Electric Generators Serving the DISC Building	ACM1

Looks to me like the only ones missing are EU 090 – 2 Boardwalk Resort Boilers and EU 112 – Animal Crematory.

I could also use copies of permit AC48-271849, which I am pretty sure was for the North Service Area Laundry Boilers (originally for laundry boilers 1 – 4) and an AC permit for the Boardwalk Resort Boilers (I can't find an AC number for these, hopefully you have something). I'm trying to see if I can clean up that section a little more with appropriate requirements and rule citations.

Jon Holtom, P.E., CPM
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Division of Air Resource Management
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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.