From:	Bumar, Rich
To:	Costello, Martin
Subject:	(Archived w/ Attachments) RE: exempt engine emissions
Date:	Wednesday, October 24, 2012 11:32:26 AM
Attachments:	image001.jpg WDW Generators and other RICE units edited 10-24.xlsx

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Marty,

Please see the attached spreadsheet with edits we discussed. I calculated the annual emissions from the units in the exempt list to 4.8 tons per year of NOx, which has the highest AP-42 emissions factor of the criteria pollutants.

Since we moved some of the units from the regulated list to the exempt list, there are now a total of 108 units owned by WDW that will be regulated by 4Z and/or NSPS and 31 units owned by RCES that will be similarly regulated. The exempt list has grown to 30 units and include both WDW and RCES units.

I will speak with the DISC manager today to see if they will come over to our side on the emergency classification.

I know another question you had on the RAI was the location of the two new insignificant spray booths we installed. The first one is at the Disney's Hollywood Studios theme park in what we call the "Scenic Shop". They use only water-based paint there and we expect no more than 200 pounds per year of VOC to be emitted. The second one is at the WDW Florist Shop on Live Oak Lane, which is located in our "administration area" in the east part of our property. They use approximately one 12-oz can of rattle-can spray paint per day. Assuming a 365-day a year operation, that is equivalent to no more than 275 pounds of VOC per year.

Please let me know if I can be of any further assistance.

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

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, October 24, 2012 10:02 AM
To: Bumar, Rich
Subject: exempt engine emissions

Rich,

I made a calculation of NOx emission from your exempt engines and the 15,025 gpy of diesel. I estimate maximum emissions well below 5 tpy (2.7 tpy assuming that half the engines have fuel timing retard to reduce NOx—or 3.3 tpy assuming no NOx controls—based on AP-42 emission factors http://www.epa.gov/ttnchie1/ap42/ch03/final/c03s04.pdf) which is the threshold for being listed as insignificant. Can you check this calculation and if you want, send a request to place these exempt engines in the Appendix I for insignificant sources? Otherwise these engines will be grouped with the Unregulated sources and get an EU number and have to deal with AORs each year.

I left you a voice mail on this.

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

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.