From: Holtom, Jonathan
To: "Bumar, Rich"
Cc: Costello, Martin
Subject: RE: AC permits for Dry Cleaning Plant???
Date: Wednesday, October 31, 2012 8:03:29 AM

Rich,

The pre-pre-draft I sent you was for you to look at only sections III.A. – III.C. The language in the rest of the sections related to the engines is mostly just place holder text from the last permit. Marty is working on those sections separately, so what is in the version you have will change very much. Please don't spend any time looking at them for now.

There are likely several conditions that you may find showing back up in this version of the permit. Part of the tedious work involved with the renewal permits is to perform a thorough review of past permitting actions and applicable rules to ensure that each renewed Title V permit is issued with all of the appropriate applicable requirements. The PM and CO testing once every five years is a specific requirement contained in the original construction permit and is consistent with the applicable requirements in Rule 62-297.310(7), F.A.C. If you happen to have a copy of a subsequent construction permit that specifically removed this testing, please send it along for us to review and reflect. I looked through all of our posted documents and could not find one, which didn't really surprise me. The prior to renewal testing provides us with the reasonable assurance that we need to know you can comply with your permit limits before we renew your permit for another 5 years.

Jon Holtom, P.E., CPM
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Air Permitting and Compliance
(850) 717-9079
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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

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From: Bumar, Rich [mailto:Rich.Bumar@disney.com]
Sent: Tuesday, October 30, 2012 6:18 PM
To: Holtom, Jonathan
Cc: Costello, Martin
Subject: RE: AC permits for Dry Cleaning Plant???

Gentlemen,

I took a look at the preliminary draft permit. There are lots of things in there that are obviously not ours, so I got confused for a moment. I didn't realize that at first.

I noticed that once every 5-year testing is back in the draft for PM and CO for the animal incinerator. I know we had to do that at one time but newer permits had dropped those requirements.

I also noticed that there was a question about cylinder displacement in the DISC generator section. The engines displace 65 liters total with 16 cylinders, so they are just over 4 liters per cylinder.

If there is any other information I can provide to make this easier for you, please let me know.

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: Holtom, Jonathan [mailto:Jonathan.Holtom@dep.state.fl.us]
Sent: Tuesday, October 30, 2012 1:13 PM
To: Bumar, Rich
Cc: Costello, Martin
Subject: AC permits for Dry Cleaning Plant???

Hi Rich,

Do you happen to have a copy of the older AC permits for the NSA Laundry Dry cleaning facility? I think the most recent one that includes the underlying requirements was issued by the Central district as permit No. 0950111-012-AC on 12/10/97. Tom Cascio processed permit No. 0950111-028-AC on 07/02/07 as a revision to recognize the replacement of the Multimatic Atlas 45 with the current Columbia T.D. Mach 2 80-80 dry cleaning machine and included the statement that "this permit supplements all previously issued AC and AO permits for this emissions unit." I must be missing some other permit reference, though, because the original Title V (005-AV) listed 4 dry cleaning machines, a revised Title V (018-AV) issued 10/6/99 lists 3 dry cleaning machines, and the first Title V renewal (021-AV) effective 01/01/03 lists one dry cleaning machine. The current (expiring) Title V permit only includes the conditions from Tom's AC revision (028-AC), which only includes the requirements from NESHAP Subpart M. Any AC permits you have related to Emissions unit 121 – Dry Cleaning Plant would be very much appreciated.

If you have time and want to start looking over what we have done so far on

your renewal, I have attached my working copies of the statement of basis and draft/proposed permit. I re-did sections III.B. and III.C. yesterday based on our conversations last Friday. I'm currently trying to figure out what applicable requirements exist for the dry cleaning plant and Marty is finishing the engine sections by painstakingly pulling the testing, reporting and monitoring requirements out of ZZZZ for your existing non-emergency engines at EPCOT and DISC. We are pushing to have a completed pre-draft permit this week, so if it would be easier for you to wait and look at the draft in its entirety, I would understand. However, given the small number of days left before we need to have a public notice published, your ability to start looking at the first three sections now could save a little time.

Jon Holtom, P.E., CPM
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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.