From: Bumar, Rich
To: Costello, Martin
Subject: (Archived w/ Attachments) RE: WDW Emergency Generator/RICE Unit List
Date: Monday, October 22, 2012 8:47:34 AM
Attachments: WDW Generators and other RICE units edited 10-22.xlsx

---

Marty,

I will be in a meeting until noon today and I will give you a call afterwards.

Here is the updated list as I have it so far. I have assigned codes for the units. The W prefix units are maintained by WDW. The R prefix codes are RCES units. The SI units are all 4 stroke rich burn. Also, I have identified the dates of the existing units.

We do not want to designate any units as limited use. I spoke with the RCES manager and they want to keep the unit at the CEP as available for emergency use.

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: Monday, October 22, 2012 8:31 AM
To: Bumar, Rich
Cc: Costello, Martin
Subject: RE: WDW Emergency Generator/RICE Unit List

Thanks Rich for putting together this list.

We can list the engines that are existing (installed prior to Dec 19, 2002)/over 500 hp/emergency as insignificant and place them in Appendix I since they have no requirements under the RICE rules per 40 CFR 63.6590(b).

I am unclear for the larger engines whether you classified them correctly since I think you may have used 2006 as the date to determine "existing" or "new" for all the engines-- but the date is different(Dec 19, 2002) for engines over 500 hp…. Can you check on this?

For the spark ignited engines; are they all 4 stroke rich burn? If not, please flag the 2 stroke or lean burn engines…

If there are any engines that you want to designate as "limited use" or limited to a total of 100 hrs/yr, then these can also be moved to the insignificant list. Think about classifying the Black Start Engine for Reedy Creek's power plant, as "Limited Use" if it never operates over 100 hrs/yr—then it would be put on the insignificant list.

We can discuss by phone how to group the remaining engines in the permit. The RICE rule would have similar requirements for the existing engines so if you want to group all engines with similar requirements into one emissions unit, then it can be done as such. The other categories in the rule would be the NSPS engines or the New engines under Subpart ZZZZ (sometimes both rules are imposed on an engine depending on the dates of install).

Another way, that we discussed is grouping by the two maintenance/control entities; Nixon Power (for WDW owned engines?) and RCES, then we can have a few more EUs this way but it may make it easier for you to delegate responsibility internally. If this is done, then the number of RICE sections in the permit would not change since I would still include all engines of similar rule requirements in the same permit section (just like if there were two boilers of similar type would be listed in the same section of the permit). In this case we could have two tables (WDW and RCES) with a new column that identifies which part of the RICE rules apply for each group of similar engines (like "NSPS meeting 40 CFR 89 limits", "Subpart ZZZZ new meeting Table 2a", ….). Then in each engine section of the main permit, we could place the table of engines and we would just refer to the Appendix where we have copies of the complete RICE rules. It would be simple to handle it this way by leaving all the details in the Appendix.

Let me know what you think,

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

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.
From: Bumar, Rich [mailto:Rich.Bumar@disney.com]
Sent: Monday, October 08, 2012 3:09 PM
To: Costello, Martin
Subject: WDW Emergency Generator/RICE Unit List

Marty,

Here's the first installment of the information you needed for the WDW Title V RAI. What I have enclosed is the list of all of the emergency generators and RICE units. I have divided the list among 3 tabs in the spreadsheet: WDW units, RCES Units, and RCES Emergency Diesel Pumps. It is broken down the way it is because all Walt Disney World units are managed under one contract by Nixon Power. Reedy Creek Energy Services (RCES) is the utility company for the property and their units are maintained by their staff, including emergency generators and emergency diesel pumps. All of the units, existing or new, large or small are maintained at or above RICE and NSPS rule requirements in that they are maintained according to manufacturer's requirements and the job plans include annual maintenance including oil changes, oil and air filter changes, in addition to testing for reliability. WDW units are subjected to further testing and maintenance and include annual load bank testing to ensure they can achieve the specified power output.

I have sorted each of the lists based on whether or not the units were existing as of June 2006 and whether or not the units are greater than 500 hp. So there are 4 groups in the WDW and RCES generator lists: Existing/small, Existing/large, New/small and New/large. In addition there are a few spark ignition engines in the WDW list. Regardless of the age, size or ignition type, all of these units are and will continue to be maintained on the same schedules.

I will be compiling the rest of the stuff you needed shortly but I wanted to get you this list as soon as it was ready.

Please let me know if you have any questions.

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*