From: Bumar, Rich
To: Costello, Martin
Cc: Kindle, Robert
Subject: RE: 0950111-032-AV Draft Proposed Permit 5 pm version.docx
Date: Wednesday, November 07, 2012 11:25:23 AM

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
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: 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.