From: Bumar, Rich
To: Costello, Martin
Subject: Sulfur Analysis Methods
Date: Thursday, November 08, 2012 10:10:43 AM

Marty,

We have about completed the review. We gave it a very thorough going over. My counterparts at RCES were a bit confused over the requirements for test methods for some of their pollutants but we did the cross-referencing and saw exactly where the methods came from. We discovered that the old permits had an error- they were specifying Method 20 for NOx emissions from the Epcot generators. That method is for combustion turbines. You correctly identified Method 7E as the proper method.

The one issue Bob Kindle would like addressed is the method for determining fuel oil sulfur content. All of the specific conditions in the permit that list methods for sulfur content are end with "**or other equivalent methods after approval of the Department**". There does not seem to be requirement in the rule that says that language is necessary. Can we remove that language from the permit?

What we would like to see included for all of the fuel oil analyses (the combustion turbine, the Epcot generators and the DISC generators) is ASTM D5453. We also had written into the previous permit for the Epcot generators that specified a series of ASTM methods that could be used and it added the verbiage "or the latest edition." I think that would allow us to use the most recent ASTM methods available without needing specific approval from DEP to use them. Can we add that verbiage to conditions that include fuel oil sulfur analysis methods? Those would be A.23 and E.15.

Rich Bumar, P.E.
Environmental Engineer
Walt Disney World Resort • Environmental Control Dept. • Maingate Office Complex #2235

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From: Costello, Martin [mailto:Martin.Costello@dep.state.fl.us]
Sent: Wednesday, November 07, 2012 1:14 PM
To: Bumar, Rich
Subject: RE: 0950111-032-AV Appendices jh 11-5-12 tuesday 3 pm.docx

Here is the single public notice for the AC revision and TV renewal (draft/proposed). I plan to send the entire permit package (AC and TV) tomorrow before noon.

Please call me to discuss your request about clipping out the area source parts from the

RICE rules. I want to make sure it's a good idea because you have to be careful.

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

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From: Bumar, Rich [mailto:Rich.Bumar@disney.com]
Sent: Wednesday, November 07, 2012 1:08 PM
To: Costello, Martin
Subject: RE: 0950111-032-AV Appendices jh 11-5-12 tuesday 3 pm.docx

Ok sounds good. I will get that to you by tomorrow morning at the latest.

Do you have the public notice language available yet? We would like to get prepared so we can get it out ASAP when we finalize everything.

Rich Bumar, P.E.
Environmental Engineer
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From: Costello, Martin [mailto:Martin.Costello@dep.state.fl.us]
Sent: Wednesday, November 07, 2012 1:06 PM
To: Bumar, Rich
Subject: 0950111-032-AV Appendices jh 11-5-12 tuesday 3 pm.docx

Rich,

Make your changes to this our most recent draft. It is a lot cleaner than the one you have.

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.