From: Bumar, Rich
To: Costello, Martin
Subject: (Archived w/ Attachments) RE: exempt engine emissions
Date: Thursday, October 25, 2012 1:01:40 PM
Attachments: image001.jpg

Marty,

I am at my desk now and should be here a while, so any time between now and 5 pm is good for me. I may be on the phone when you call- I am getting quotes for catalysts today so if you call I may have to call you back in a few minutes.

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: Thursday, October 25, 2012 9:53 AM
To: Bumar, Rich
Subject: RE: exempt engine emissions

Thanks,

Let me know if there is a good time to call you this afternoon about the DISC building engines. 3 PM would work for me.

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

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From: Bumar, Rich [mailto:Rich.Bumar@disney.com]

Sent: Thursday, October 25, 2012 9:00 AM
To: Holtom, Jonathan
Cc: Costello, Martin; Garrido, Jose R.; Garcia, Jose M; Kindle, Robert
Subject: RE: exempt engine emissions

Gentlemen,

I do not see any problem listing the all of the engines not subject to ZZZZ as unregulated. Rather than create a separate category for insignificant engines out of the list I included in the "Exempt" tab, let's put those engines together in an unregulated EU. It would avoid confusion here and we would are already maintaining all of the engines in the same way. We would understand that those unregulated engines would not be subject to the ZZZZ recordkeeping and maintenance requirements. I agree that it's likely that the unregulated engines' emissions would be below threshold so the AOR will be very easy to do. However, I'll have to calculate the emission first to know if they were under threshold so it's no more work for me in the AOR than if the emission needed to be reported.

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: Thursday, October 25, 2012 8:29 AM
To: Bumar, Rich
Cc: Costello, Martin
Subject: RE: exempt engine emissions

Good Morning Rich,

Marty is correct in that the group of engines not subject to ZZZZ have the potential to emit greater than 5 tons per year and, therefore, qualify under the Title V requirements as "unregulated" units rather than "insignificant" units.

As a clarification, emergency engines are a classification defined by the federal rules (we repealed Florida's definition in order to use the federal definition). Emergency RICE subject to regulation under ZZZZ have a 100 hour per year limit on non-emergency use. Those engines that are specifically exempted from regulation by ZZZZ do not have a limit on their operational hours. Unregulated means that there are no unit specific applicable requirements (i.e., federal rules, state rules, AC permit, etc.) that apply. Pursuant to Rule 62-210.300(3)(a)35., F.A.C., to be exempt from the requirement to obtain an AC permit which would

establish unit specific applicable requirements, a RICE or group of RICE collectively shall not exceed 5,400 gallons of gasoline, 64,000 gallons of diesel fuel, 288,000 gallons of propane, or 8.8 million standard cubic feet of natural gas, or a prorated amount if more than one fuel type is used at a facility. So, the only implied restriction upon which to base potential to emit calculations would be the maximum fuel levels established in the categorical exemption. Calculations based on emissions factors for the combustion of 64,000 gallons of fuel oil results in potential emissions greater than the 5 tpy insignificant level.

Jon Holtom, P.E., CPM
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From: Costello, Martin
Sent: Wednesday, October 24, 2012 6:20 PM
To: Bumar, Rich
Cc: Holtom, Jonathan
Subject: RE: exempt engine emissions

Rich,

I appreciated your help today identifying the exempt engines and keeping emission below 5 tpy of NOx based on actual/historical conditions for these emergency engines. Unfortunately, I learned this afternoon that our rule for determining which sources can be determined “insignificant” involves calculations based on potential to emit(PTE). This allows for constraints which are federally enforceable, like the NESHAP requirements for emergency engines not to exceed 100 hrs/yr of non-emergency operation (63.6635). Therefore, calculations of PTE in the case of engines which are exempt, partly because the engine is an emergency engine, would probably assume 100 hrs/yr for emergency engines like these. (see rule language from 62-213 below)

It seems that even though historical operation of all the exempted engines has normally been much less than 100 hrs/yr per engine, the calculation of PTE is normally done at the constraint that is federal enforceable, which would be 100 hrs/yr of non-emergency operation. Using 100 hrs/yr greatly reduces the number

of emergency engines that would contribute less than 5 tpy of NOx. It no longer makes sense to break out all the exempted engines and putting them in Appendix I for insignificant sources—unless you were willing to take a permit condition limiting these engines hours to 25 hr/yr….not likely.

We can list the group of about 30 engines found in the "exempt engines" tab in Appendix U (unregulated engines) as a single EU. The bad news is that AORs would be required for these exempt engines. The good news is that we know actual emissions (not potential) are below 5 tpy from this group and you can report this EU as being less than threshold of 5 tpy, instead of trying to quantify annual emissions on the AOR.

Sorry for leading you to believe we could classify the group as "insignificant" with virtually no requirements but these engines will have very little requirements under the Unregulated category. I'm still learning about Title V renewals and the complex RICE NESHAP.

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

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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.

62-213.430 Permit Issuance, Renewal, and Revision.

(6) Insignificant Emissions Units or Pollutant-Emitting Activities.
(a) All requests for determination of insignificant emissions units or activities made pursuant to paragraph 62-213.420(3)(n), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to this chapter. Insignificant emissions units or activities shall be approved by the Department consistent with the provisions of paragraph 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to this rule.
(b) An emissions unit or activity shall be considered insignificant if all of the following criteria are met:
1. Such unit or activity would be subject to no unit-specific applicable requirement.
2. Such unit or activity, in combination with other units and activities proposed as insignificant,

would not cause the facility to exceed any major source threshold(s) as defined in subparagraph 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s).
3. Such unit or activity would neither emit nor have the potential to emit:
a. 500 pounds per year or more of lead and lead compounds expressed as lead;
b. 1,000 pounds per year or more of any hazardous air pollutant;
c. 2,500 pounds per year or more of total hazardous air pollutants; or
d. 5.0 tons per year or more of any other regulated pollutant.

62-210.200 definitions:

(141) "Federally Enforceable" – Pertaining to limitations and conditions which are enforceable by the Administrator, including
any requirements developed pursuant to Title 40 of the Code of Federal Regulations, any requirements within the State
Implementation Plan, and any requirements established pursuant to permits issued under:
(a) The state's Title V operation permit program, consistent with 40 C.F.R. Part 70.
(b) Paragraph 62-210.300(2)(b), F.A.C.;
(c) 40 C.F.R. 52.21; or
(d) Subparagraph 62-204.800(11)(d)2., F.A.C. (formerly 62-204.800(10)(d)2.); Rule 62-212.300, F.A.C. (formerly 17-212.300,
formerly 17-2.520); Rule 62-212.400, F.A.C. (formerly 17-212.400, formerly 17-2.500); Rule 62-212.500, F.A.C. (formerly 17-
212.500, formerly 17-2.510); Rule 17-2.17, F.A.C. (repealed); or Rule 62-4.210, F.A.C. (formerly 17-4.210, formerly 17-4.21).