From: Bumar, Rich
To: Holtom, Jonathan; Costello, Martin
Cc: Garrido, Jose R.; Rodriguez, Armando; Schmudde, Lee
Subject: RE: CAIR form for EU 088
Date: Tuesday, November 06, 2012 8:38:07 AM
Attachments: RCID CAIR Application.pdf

Hey guys,

Here is the CAIR application.

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: Holtom, Jonathan [mailto:Jonathan.Holtom@dep.state.fl.us]
Sent: Monday, November 05, 2012 1:10 PM
To: Bumar, Rich; Costello, Martin
Cc: Garrido, Jose R.; Rodriguez, Armando; Schmudde, Lee
Subject: RE: CAIR form for EU 088

We can work with the scanned version. It will be the same as if we had received it with the EPSAP application as an attachment.

We'll take a look at the latest engine lists and let you know if we need any additional information.

I think we can work something acceptable into the permit about the emergency operation of the DISC engines. Either that the 50 hours does not commence until May 3rd, or that by our authority pursuant to the rule, we can authorize additional hours for maintenance and testing beyond the 100/50 hour limitation on a case-by-case basis.

Thanks for all of your help, we are getting very close. If you find out anything definitive about your full plan for the DISC generators today, please let us know. We were hoping to issue you at least a full pre-draft tomorrow and the official draft very shortly thereafter. We will also send you a Word version of the Public Notice so that you can get the newspaper rolling on the publication in the next few days.

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: Monday, November 05, 2012 12:53 PM
To: Holtom, Jonathan; Costello, Martin
Cc: Garrido, Jose R.; Rodriguez, Armando; Schmudde, Lee
Subject: RE: CAIR form for EU 088

Jon and Marty,

Do you need a hard copy of the CAIR form or will a scanned and emailed version do? I am having the DR sign it today at 2 pm.

Also, I have included what I think should be the final update of the emergency generator list. I have identified which NSPS condition set, if any, is applicable to each engine.

I expect to find out no later than the end of the day tomorrow if we are planning to reclassify the DISC generators. The plan I have proposed to the facility management at DISC is to install emissions controls and parametric monitoring by May 3, 2013 but reclassify the engines as emergency generators by that date. I just haven't gotten the buy-in from everyone yet, but our RO is for it.

Our operation plan would be to take care of any planned maintenance that will take longer than would be allowed under the rules before May 3 so we can use our allowable hours as designated under our current permit conditions but have them switch to emergency status on May 3, 2013. We have a one-time 80 hour outage planned to replace a bunch of breakers and distribution boards. We need to complete that job before we reclassify them so that the hours do not count against the 50 hour non-emergency use limit for emergency generators. Can that be written into the permit? We have determined that our annual planned maintenance should never exceed 50 hours otherwise. For this option to work, we would need some language in the permit something like this:

> Permitting note: Any unplanned interruption of power or critical power component failure which requires the facility to use generator power will be considered a power interruption as referenced in the definition of Emergency Stationary RICE as

found in § 63.6675 of Chapter 40 of the Code of Federal Regulations.

Our management needs some kind of reassurance that an unplanned usage of the engines because of the loss of all or part of the critical power supply system would be considered "emergency operation". For example, if one of the parallel circuits in the UPS fails, they switch to generator power. Even though it would be physically possible to run on only one circuit, since part of their critical power supply is compromised, they switch to generator power.

As Melanie King reiterated to me several times, the EPA considers generator operation during planned maintenance non-emergency operation. That was the only specific criteria she gave us. Therefore, operation of the generators due to an unplanned critical component failure that requires switching to generator power would be emergency operation. If we can get that language in our permit, we should be able to reclassify them on May 3.

Thanks,

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: Friday, November 02, 2012 6:39 PM
To: Bumar, Rich
Cc: Costello, Martin
Subject: CAIR form for EU 088

Hi Rich,

Could you please email me a copy of your current CAIR form signed by your DR? Your application references one previously submitted in 2008, but newly signed and certified forms should be submitted with every renewal. Thanks for your help!

Jon Holtom, P.E., CPM
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Air Permitting and Compliance
(850) 717-9079
FAX: (850) 717-9097

Email: jon.holtom@dep.state.fl.us

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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.