

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

June 16, 1995

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Thomas M. Moses
District Administrator
Reedy Creek Improvement District
Post Office Box 10170
Lake Buena Vista, Florida 32830-0170

Dear Mr. Moses:

RE: Reedy Creek Improvement District (RCID)
EPCOT Center Diesel Generators No. 1 and No. 2
Construction Permits AC 48-105243 and AC 48-106650 and
GE Gas Turbine with Heat Recovery Steam Generator,
PSD-FL-123 and AC 48-137740

The Department is in receipt of your letter dated April 17, 1995, requesting a revision of Specific Conditions Nos. 2 and 7 of the above mentioned permits. The Department considered your request and agrees to revise your permits as proposed in your letters.

The revision of Specific Condition No. 2 of each permit is finalized as follows:

**SPECIFIC CONDITION No. 2 FOR PERMITS AC 48-105243 and AC 48-106650
EPCOT CENTER DIESEL GENERATOR No. 1 and No. 2**

FROM:

Old Specific Condition No.2

Emissions rates shall not exceed:

	Max. Allowable Rate lb/hr	Actual Emissions tons/yr
Particulate Matter	10.0	9.5
Sulfur Dioxide	14.5	14.0
Nitrogen Oxides	126.0	126.0
Carbon Monoxide	1.5	2.8
Volatile Organic Compounds	2.0	2.0

Mr. Thomas M. Moses
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TO:

New Specific Condition No. 2

Emissions rates shall not exceed:

	Max. Allowable Rate lb/hr	Annual Emissions tons/yr
Particulate Matter	10.0	9.5
Sulfur Dioxide	14.5	14.0
Nitrogen Oxides	126.0	126.0
Carbon Monoxide	2.9	2.8
Volatile Organic Compounds	2.1	2.0

**SPECIFIC CONDITION No. 7 FOR PERMITS PSD-FL-123 & AC 48-137740
GE GAS TURBINE WITH HEAT RECOVERY STEAM GENERATOR**

RCID COMMENT:

RCID requested to delete reference to Rule 62-252.300, F.A.C., since this rule applies to Gasoline Dispensing Facilities.

DEPARTMENT RESPONSE:

The Department acknowledges that Rule 62.252.300, F.A.C. does not apply to this source. However, this reference will not be deleted since it is part of the general statement of Rule 62-210.300(3), F.A.C., Exemptions. For clarification, specific condition No. 7 will be revised as follows:

FROM:

Old Specific Condition No.7

Pursuant to Rule 62-210.300(3)(u) F.A.C., this condition will be deleted.

It should be noted that pursuant to Rule 62-210.300(3), F.A.C., this source, although exempt from permitting requirements of Chapter 62-210 and Chapter 62-4, F.A.C., is subject to any applicable emission standard specified in Rule 62-252.300, and 62-296, F.A.C., other than Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) requirements.

Mr. Thomas M. Moses
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Furthermore, pursuant to Rule 62-213.420(3)(m), F.A.C., this source, although currently exempt from permitting, is required to be included in the Title V operation permit application.

TO:

New Specific Condition No. 7

In accordance with Rule 62-210.300(3)(u) F.A.C., the Black Start Cummings No.2 fuel oil fired emergency electric generator is exempt from permitting requirements.

Pursuant to Rule 62-210.300(3), F.A.C., this source, although exempt from permitting requirements of Chapter 62-210 and Chapter 62-4, F.A.C., "shall be subject to any applicable emission standard specified in Rule 62-252.300, and 62-296, F.A.C., other than Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) requirements."

Furthermore, pursuant to Rule 62-213.420(3)(m), F.A.C., this source, although currently exempt from permitting, is required to be included in the Title V operation permit application.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

(a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

Mr. Thomas M. Moses
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- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

A copy of this letter shall be filed with the construction permits, Nos. AC48-105243, AC48-106650 and AC48-137740 and shall become part of each permit.

Sincerely,



for

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/th/t

Enclosure:

Mr. T. M. Moses' letter of April 17 and June 2, 1995

Mr. Thomas M. Moses
June 16, 1995
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CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **PERMIT AMENDMENT** and all copies were mailed by certified mail before the close of business on 6-20-95 to the listed persons.

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

K. J. Ober 6-20-95
Clerk Date

Copies to be furnished to:

Chuck Collins

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Thomas M. Moses, D. Admin
 Reedy Creek Improve. District
 P.O. Box 10170
 Lake Buena Vista, FL
 32830-0170

4a. Article Number
 Z 392 979 047

- 4b. Service Type
- Registered Insured
 - Certified COD
 - Express Mail Return Receipt for Merchandise

7. Date of Delivery
 6/23/95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
 DW

Thank you for using Return Receipt Service.



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Z 392 979 047

From: Thomas Moses
 Reedy Creek
 Lake B V, FL

Postage	\$
Certified Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$

Postmark or Date
 AC48-105243 6-20-95
 " -106650
 PSD-F1-123 + AC48-137740

Memorandum

**Florida Department of
Environmental Protection**

TO: Howard Rhodes
FROM: Clair Fancy *I S. C. H. W. C.*
DATE: June 16, 1995
SUBJECT: Reedy Creek Improvement District (RCID)
Construction Permits Nos. AC48-105243, AC48-106650 and
AC48-137740 & PSD-FL-123


Attached for your approval and signature is a letter that will amend the above mentioned permits for the RCID facility. The amendment will clarify the language of specific condition No. 7 and will correct an emission rate as requested. This permit amendment will not change the intent of the previously issued permits, nor will it result in a significant increase of emissions.

I recommend your approval and signature.

CHF/th/kt

Florida Department of
Environmental Protection

Memorandum

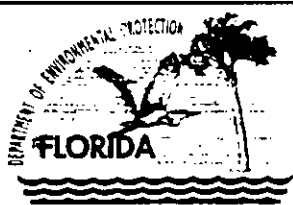
TO: Howard Rhodes 
FROM: Clair Fancy
DATE: October 10, 1994
SUBJECT: Amendment to Construction Permit AC48-137740
(AO48-170280)
Reedy Creek Improvement District (RCID)

Attached for your approval and signature is a permit amendment prepared by the Bureau of Air Regulation for the above mentioned company to have a customized fuel monitoring schedule as provided by Subpart GG of the federal new source performance standards.

I recommend your approval and signature.

CF/TH/bjb

Attachment



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 10, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas M. Moses
District Administrator
Reedy Creek Improvement District
P. O. Box 10170
Lake Buena Vista, Florida 32830-0170

Dear Mr. Moses:

Re: Amendment to Construction Permit
AC48-137740 AO48-170280
PSD-FL-123
Custom Fuel Monitoring Schedule
Reedy Creek Improvement District

This is in response to your June 15, 1994, letter, requesting a Custom Fuel Monitoring Schedule for sulfur content of the fuel and to clarify the applicable regulations for the subject facility. The facility is required to comply with Section 60.334(b) of Subpart GG of the New Source Performance Standards, which allows sources to apply for a custom fuel monitoring schedule. In addition, Specific Condition No. 10 is revised to include the 40 CFR 60, Subpart Db, NSPS for Industrial-Commercial Institutional Steam Generating Units. Therefore, the permit specific conditions are amended as follows:

New Specific Condition No. 14

The following custom fuel monitoring schedule shall be used at this facility:

Custom Fuel Monitoring Schedule for Natural Gas

1. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel being fired in the gas turbines.
2. Sulfur Monitoring
 - a. Analysis for sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or

an approved alternative method. The approved methods are ASTM D1072-80, ASTM D3030-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).

- b. This custom fuel monitoring schedule shall become effective on the date this amendment becomes valid. Effective the date of this custom schedule, sulfur monitoring shall be conducted at least once per calendar quarter. Sulfur analyses results shall be reported in units of grains of sulfur per 100 cubic feet of natural gas and shall be submitted with the quarterly excess emissions report required by 40 CFR 60.7. (EPA's letter dated June 15, 1994).
 - c. The sulfur content of the fuel shall also be expressed as maximum sulfur dioxide emissions (lb/hr) and shall be consistent with the limits specified in Specific Condition 5 of permit AC 48-137740.
 - d. Should any sulfur analysis as required in items 2(b) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
 4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

Custom Fuel Monitoring Schedule for Liquid Fuel

1. Sulfur and nitrogen content of the liquid fuel:

Upon delivery of the fuel, a sample shall be randomly taken from one compartment of each truck and composited for analysis (for verification of the vendor data) by a third party laboratory using ASTM Method D-3228 for nitrogen analysis, and ASTM Method D-4294 for sulfur analyses.

Mr. Thomas M. Moses
October 10, 1994
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Specific Condition No. 10

FROM:

The project shall comply with all the applicable requirements of:

- a. Chapter 17-2, FAC
- b. 40 CFR 60, Subpart GG, Gas Turbines

TO:

The project shall comply with all the applicable requirements of:

- a. Chapters 62-209 through 62-297, F.A.C.
- b. 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines.
- c. 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

In accordance with Rule 17-213.420(3), F.A.C., Standard Application Form and Required Information, the permittee is required to include all applicable requirements as defined in Rule 17-213.100(7), F.A.C., for each emission unit at this facility when applying for a Title V operating permit.

Attachments to be Incorporated

Mr. Thomas M. Moses' June 5, 1994, letter.
(Permit Amendment Fee Received September 8, 1994)

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

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- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
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Mr. Thomas M. Moses
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This letter amendment must be attached to Construction Permit No. AC48-137740 (AO48-170280), and shall become a part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/bjb

Attachments

cc: C. Collins, CD
J. Harper, EPA
J. Bunyak, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 10/11/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is
hereby acknowledged.

Barbara J. Fontwell 10/11/94
Clerk Date