



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

**Draft Air Construction Permit No. 0950111-023-AC**

## Permittee

Walt Disney World Company  
**Walt Disney World Resort Complex**  
  
P.O. Box 10,000  
Lake Buena Vista, FL 32830-1000

File No. **0950111-023-AC**  
Facility  
ID No. **0950111**  
SIC No. **7966**

Permit No. **0950111-023-AC**  
Expires: **December 31, 2004**

*Authorized Representative:*  
Lee Schmudde  
Responsible Official

## Project and Location

This project is to modify Air Construction Permit **0950111-022-AC** that reclassified three existing diesel electric generators serving the DISC building at the Walt Disney World Resort Complex from insignificant status to regulated status. Under the current air construction permit, the annual fuel quantity used is limited. The nameplate rating of each generator is 1.75 megawatts (MW). Diesel fuel for the generators is stored in three 10,000 gallon fuel tanks.

Based on the requirements of the current air construction permit, the applicant tested the emissions unit to verify the accuracy of the NOx emissions estimate used in the permit document. The existing air construction (AC) permit limits the annual diesel fuel oil usage to 185,000 gallons for these three generators. Based on the results of the tests, the Department has determined that a higher level of fuel usage is justified. *Therefore, the maximum annual diesel fuel oil usage is set at 225,000 gallons for this emissions unit under this permit modification.*

This facility is located at 1375 Buena Vista Drive, Orange and Osceola Counties; UTM Coordinates: Zone 17, 449.70 km East and 3138.00 km North; Latitude: 28° 22' 24" North and Longitude: 81° 32' 46" West. This Air Construction Permit Modification is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to construct and operate in accordance with the conditions of this permit modification and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department). The attached appendix is made a part of this permit:

Appendix GC

Construction Permit General Conditions

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Michael G. Cooke, Director  
Division of Air Resource Management

"More Protection, Less Process"

Printed on recycled paper.

**Facility Description**

This facility consists of the following emissions units:

E.U. ID No. (Facility ID No.)	Brief Description
<u>North Service Area Dry Cleaning Plant</u> -001 (LDC-1) <u>North Service Area (NSA)</u> -005 (NSA-17)  -006 (NSA-18) -007 (NSA-1 thru 7, 11, 12, 14 thru 16) -014 (NSA-8) -015 (NSA-9 & 10) -020 (LBB-1a) -021 (LBB-1b) -022 (LBB-1c) <u>Disney's Grand Floridian Hotel</u> -035 (GFR2 thru 18)	Dry Cleaning Unit #1  North Service Area (NSA) Central Shops Building Annex (CSBA): Sand Blast Chamber No. 1: unregulated NSA Boat Maintenance & Painting Facility NSA Central Shops Building  NSA Lofting Building PSB NSA CSBA Laundry Boiler #1 Laundry Boiler #2 Laundry Boiler #3  16 Hot Water Heaters
<u>Disney-MGM Studios</u> -053 (STB-1, 2A, 2B1, 2B2, 3 thru 8) <u>Disney-MGM Studio Tours</u> -061 (MGM-10) <u>Buena Vista Construction</u> -062 (BVC-1) <u>Lake Buena Vista Community Village</u> -063 (LBV-1 & 2) <u>Disney Village</u> -065 (VM-3) <u>Ft. Wilderness/Golf Course</u> -066 (FWR-4) <u>Yacht &amp; Beach Club</u> -067 (YBC-3) <u>EPCOT Center</u> -068 (EP-1 & 2) -070 (EP-3) <u>South Service Area</u> -071 (SSA-1)	10 Hot Water Heaters  Paint Spray Booth (PSB)  PSB  PSBs  PSB  PSB  PSB  PSBs PSB  PSB
Administrative Area	
-072 (LAU-1 & 2)	2 Laundry Thermal Oil Heaters
Magic Kingdom	
-075 (MK-1)	PSB

Reedy Creek Improvement District/Epcot	
-076 (Epcot HWG-1 thru 3)	3 Hot Water Heaters (unregulated)
-079 (Epcot DG-1)	2.5 MW Diesel Generator
-080 (Epcot DG-2)	2.5 MW Diesel Generator
Reedy Creek Improvement District	
-081 (CEP-2)	Hot Water Heater
Blizzard Beach	
-083 (BB-1 thru 5)	5 Hot Water Heaters
Reedy Creek Improvement District	
-088 (CEP-1)	CCCT with natural gas fired Heat Recovery Steam Generator
Boardwalk Resort	
-090 (BDW-1 & 2)	2 Boilers
-091 (BDW-3 thru 10)	8 Hot Water Heaters
Magic Kingdom	
-092 (MK-3)	Hot Water Heater
-093 (MK-2)	PSB
Boardwalk Resort	
-094 (BR-1)	PSB
Coronado Springs Resort	
-095 (COS-1 thru 37)	37 Hot Water Heaters
Stand-by/Emergency Generators	
-101	120 Stand-by/Emergency Generators Firing #2 FO, NG or LP Gas
Coronado Springs Resort	
-102 (COS-41)	PSB
Disney's Animal Kingdom	
-103 (DAKU-1 thru 51)	51 Hot Water Heaters
Necropsy Building	
-112 (DAK-1)	Crawford Model CB800 Animal Crematory
All Star Resort	
-113 (ASR-2 thru 108)	107 Hot Water Heaters
-114 (ASR-1)	PSB
Tree of Life Boiler	
-115 (DAKU-52)	1.075 MMBtu/hr boiler firing NG
Disney's MGM Studios Feature Animation Building	
-117	2 PSBs
NSA Monorail Building	
-118 (NSA-20)	Monorail Trains PSB
Disney's Animal Kingdom	
-119	Maintenance PSB
-120	Three Diesel Electric Generators Serving the DISC Building

### Regulatory Classification and Project Description

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 tons per year (TPY).

The applicant escaped prevention of significant deterioration (PSD) review for the current air construction permit. The Department has determined that this emissions unit (the three diesel fuel fired electric generators), when operated under a fuel limitation of 225,000 gallons of diesel fuel per year, will not exceed the significant emission rate for NO<sub>x</sub> (40 tons per year) listed in Table 212.400-2, F.A.C., using the results of the testing required under the current air construction permit 0950111-022-AC.

Because the net increases in potential emissions for the pollutants are below the significant emissions rates listed in Table 212.400-2, F.A.C., Regulated Air Pollutants – Significant Emissions Rates, it has been determined that this change constitutes a minor modification to the facility. Therefore, this permit modification is not subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), so neither a revised Best Available Control Technology (BACT) determination nor an analysis of the air quality impact is required. The proposed project is otherwise subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The emission unit affected by this permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein), and all specific conditions of the facility's existing Title V Air Operation Permit No. 0950111-021-AV.

### Relevant Documents

The documents listed below are the basis of the permit modification. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Air Construction Permit 0950111-022-AC, issued on June 16, 2004.
- The Department's Technical Evaluation and Preliminary Determination issued concurrently with this permit modification.

### Administrative Requirements

**A.1. Regulating Agencies.** All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation, Florida Department of Environmental Protection, at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and phone number (850) 488-0114. All documents related to reports, tests, and notifications should be submitted to the Department's Central District Office in Orlando, Florida. The address and telephone numbers are:

Department of Environmental Protection  
Central District Office  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767  
Telephone: 407/894-7555

**A.2. General Conditions.** The owner and operator is subject to, and shall operate under the attached General Permit Conditions **G.1.** through **G.15.** listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes.  
[Rule 62-4.160, F.A.C.]

**A.3. Terminology.** The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code (F.A.C.).

**A.4. Forms and Application Procedures.** The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C.  
[Rule 62-210.900, F.A.C.]

**A.5. New or Additional Conditions.** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.  
[Rule 62-4.080, F.A.C.]

**A.6. Permit Extension.** The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Tallahassee Office no later than 60 days prior to the expiration of the permit.  
[Rule 62-4.080, F.A.C.]

**A.7.** Unless otherwise indicated in this permit, the construction and operation of the subject emission unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S., and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297.

**A.8.** Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations.  
[Rule 62-210.300, F.A.C.]

### **Operational Requirements**

**A.9.** The facility is subject to all of the requirements specified in Title V Air Operation Permit No. 0950111-021-AV.

**A.10.** [Reserved.]

**A.11. Operating Procedures.** Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment.  
[Rule 62-4.070(3), F.A.C.]

**A.12. Methods of Operation. Fuels.** The only fuel allowed to be burned in this emissions unit is diesel fuel oil, with a maximum sulfur content of 0.5%, by weight. The amount of diesel fuel fired in the unit shall not exceed 225,000 gallons per year.  
[Rule 62-4.070(3), F.A.C.; and applicant request.]

**Testing, Compliance Determination, and Reporting**

**A.13.** [Reserved.]

**A.14. Sulfur Dioxide.** The permittee shall demonstrate compliance with the diesel fuel sulfur limit via a fuel analysis provided by the vendor or permittee upon each fuel delivery to the emission unit's three 10,000 gallon diesel fuel tanks.

- The fuel sulfur content, in percent by weight, for the diesel fuel shall be evaluated using either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95, or the latest editions.

{Permitting note: Evaluation of the fuel sulfur content required by this specific condition may be provided by using the fuel vendor's bill of lading for each fuel delivery.}

[Rules 62-4.070(3), 62-213.440, and 62-297.440, F.A.C.]

**A.15. Recordkeeping.** The following records shall be kept at the facility:

- Total gallons of diesel fuel oil used during each month for the three generators.
- The sulfur content, in percent by weight, of all the diesel fuel delivered each month to the three 10,000 gallon tanks, based on the vendor or permittee provided fuel sample analyses. See Specific Condition A.14.

The records shall be maintained for a minimum of 5 years and made available to the Central District Office upon request.

[Rule 62-297.310(8), F.A.C.]

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION

Walt Disney World Company  
**Walt Disney World Resort Complex**  
Facility ID No. **0950111**

DEP File No. **0950111-023-AC**

Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
Permitting South Section

August 20, 2004

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 1.0. GENERAL INFORMATION

### 1.1. APPLICANT NAME AND ADDRESS

Walt Disney World Company  
P.O. Box 10,000  
Lake Buena Vista, FL 32830-1000

Responsible Official: Lee Schmudde

### 1.2. REVIEW AND PROCESS SCHEDULE

June 23, 2004	Air Construction Permit Application received.
June 23, 2004	Application deemed complete.
	Draft Air Construction Permit modification clerked.
	Public Notice published.

## 2.0. FACILITY INFORMATION

This facility is located at 1375 Buena Vista Drive, Orange and Osceola Counties; UTM Coordinates: Zone 17, 449.70 km East and 3138.00 km North; Latitude: 28° 22' 24" North and Longitude: 81° 32' 46" West.

SIC codes are:

Industry Group No.	79	Amusement and Recreation Services
Industry No.	7996	Amusement Parks

This facility consists of the following emissions units:

E.U. ID No. (Facility ID No.)	Brief Description
<i>North Service Area Dry Cleaning Plant</i> -001 (LDC-1)	Dry Cleaning Unit #1
<i>North Service Area (NSA)</i> -005 (NSA-17)	North Service Area (NSA) Central Shops Building Annex (CSBA): Sand Blast Chamber No. 1: unregulated
-006 (NSA-18)	NSA Boat Maintenance & Painting Facility
-007 (NSA-1 thru 7, 11, 12, 14 thru 16)	NSA Central Shops Building
-014 (NSA-8)	NSA Lofting Building PSB
-015 (NSA-9 & 10)	NSA CSBA
-020 (LBB-1a)	Laundry Boiler #1
-021 (LBB-1b)	Laundry Boiler #2
-022 (LBB-1c)	Laundry Boiler #3
<i>Disney's Grand Floridian Hotel</i> -035 (GFR2 thru 18)	16 Hot Water Heaters



## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

<u>Disney-MGM Studios</u> -053 (STB-1, 2A, 2B1, 2B2, 3 thru 8)	10 Hot Water Heaters
<u>Disney-MGM Studio Tours</u> -061 (MGM-10)	Paint Spray Booth (PSB)
<u>Buena Vista Construction</u> -062 (BVC-1)	PSB
<u>Lake Buena Vista Community Village</u> -063 (LBV-1 & 2)	PSBs
<u>Disney Village</u> -065 (VM-3)	PSB
<u>Ft. Wilderness/Golf Course</u> -066 (FWR-4)	PSB
<u>Yacht &amp; Beach Club</u> -067 (YBC-3)	PSB
<u>EPCOT Center</u> -068 (EP-1 & 2)	PSBs
-070 (EP-3)	PSB
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-093 (MK-2)	PSB
Boardwalk Resort	
-094 (BR-1)	PSB

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Coronado Springs Resort	
-095 (COS-1 thru 37)	37 Hot Water Heaters
Stand-by/Emergency Generators	
-101	120 Stand-by/Emergency Generators Firing #2 FO, NG or LP Gas
Coronado Springs Resort	
-102 (COS-41)	PSB
Disney's Animal Kingdom	
-103 (DAKU-1 thru 51)	51 Hot Water Heaters
Necropsy Building	
-112 (DAK-1)	Crawford Model CB800 Animal Crematory
All Star Resort	
-113 (ASR-2 thru 108)	107 Hot Water Heaters
-114 (ASR-1)	PSB
Tree of Life Boiler	
-115 (DAKU-52)	1.075 MMBtu/hr boiler firing NG
Disney's MGM Studios Feature Animation Building	
-117	2 PSBs
NSA Monorail Building	
-118 (NSA-20)	Monorail Trains PSB
Disney's Animal Kingdom	
-119	Maintenance PSB
-120	Three Diesel Electric Generators Serving the DISC Building

This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 tons per year (TPY). This facility is also a major source of hazardous air pollutants (HAPs).

The facility is located in an area (Orange and Osceola Counties) designated "unclassifiable" for PM<sub>10</sub>, "air quality maintenance" for ozone (Orange County only), and "attainment" for all the other criteria pollutants (Rule 62-204.340, F.A.C.).

The facility's existing Title V Air Operation Permit Renewal has an effective date of January 1, 2003, and will expire on December 31, 2007.

### 3.0. PROJECT DESCRIPTION

This project is to modify current Air Construction Permit 0950111-022-AC that reclassified three existing diesel electric generators serving the DISC building at the Walt Disney World Resort Complex from insignificant status to regulated status. Under the current air construction permit, the annual fuel quantity used is limited. The nameplate rating of each generator is 1.75 megawatts (MW). Diesel fuel for the generators is stored in three 10,000 gallon fuel tanks.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Based on the requirements of the current Air Construction Permit 0950111-022-AC, the applicant tested the emissions unit to verify the accuracy of the NOx annual potential emissions estimate used in the permit document. The existing air construction (AC) permit limits the annual diesel fuel oil usage to 185,000 gallons for these three generators. Based on the results of the tests, the Department has determined that a higher level of fuel usage is justified. *Therefore, the maximum annual diesel fuel oil usage is now set at 225,000 gallons for this emissions unit under this permit modification action.*

#### 4.0. PROJECT EMISSIONS & RULE APPLICABILITY

There will be a slight *decrease* in the potential levels of annual emissions of nitrogen oxides (NOx) by this permitting action, and a slight *increase* for other pollutants, as noted below.

	0950111-022-AC	0950111-023-AC
Pollutant	Potential to emit level (Tons per year) using 185,000 gallons annual fuel usage and AP-42 Factors for all pollutants	Potential to emit level (Tons per year) using 225,000 gallons annual fuel usage and test data for NOx and AP-42 Factors for the other pollutants
Nitrogen Oxides (NOx)	39.57	39.20
Particulate Matter (PM)	.94	1.14
Sulfur Dioxide (SO <sub>2</sub> ) (using 0.5% sulfur fuel, by weight)	6.45	7.84
Hydrocarbons/VOC	1.15	1.40 (TOC)
Carbon Monoxide (CO)	10.34	12.58

The applicant seeks to escape prevention of significant deterioration (PSD) review for this permitting action. The Department has determined that this emissions unit (the three diesel fuel fired electric generators), when operated under a fuel limitation of 225,000 gallons of diesel fuel per year, will not exceed the significant emission rate for NOx (40 tons per year) listed in Table 212.400-2, F.A.C.

Because the net increases in potential emissions for the pollutants, as noted above in the second column, are below the significant emissions rates listed in Table 212.400-2, F.A.C., Regulated Air Pollutants – Significant Emissions Rates, it has been determined that this change constitutes a minor modification to the facility. Therefore, the permit modification is not subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), so neither a revised Best Available Control Technology (BACT) determination nor an analysis of the air quality impact is required. The proposed project is otherwise subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

The emission unit affected by this permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations

## **TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

incorporated therein), and all specific conditions of the facility's existing Title V Air Operation Permit No. 0950111-021-AV.

### **5.0. CONCLUSION**

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department will issue a draft Air Construction Permit modification to the applicant that provides for the above changes at the facility.