

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

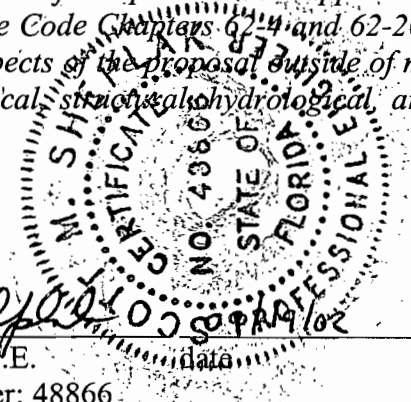
P.E. Certification Statement

Permittee:
Walt Disney World Company
Walt Disney World Resort Complex

DRAFT Permit No.: 0950111-021-AV
Facility ID No.: 0950111

Project type: Title V Air Operation Permit Renewal

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-9 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).


Scott M. Sheplak

Scott M. Sheplak, P.E.
Registration Number: 48866

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0144
Fax: 850/922-6979



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

September 18, 2002

Mr. Lee Schmudde
V.P. and Responsible Official
Walt Disney World Co.
P.O. Box 10,000
Lake Buena Vista, Florida 32830-1000

Re: Title V Air Operation Permit Renewal
DRAFT Permit Project No.: 0950111-021-AV
Renewal of Title V Air Operation Permit No.: 0950111-005-AV
Walt Disney World Resort Complex

Dear Mr. Schmudde:

One copy of the DRAFT Permit for the renewal of a Title V Air Operation Permit for the Walt Disney World Resort Complex located at 1375 Buena Vista Drive, Orange and Osceola Counties, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" must be published as soon as possible. Please expedite your review of this DRAFT Permit, because of the requirement that all Title V Permits with Acid Rain Parts must have an effective date of January 1st. To stay on this schedule, the Public Notice should be published by October 3, 2002. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

A. A. Linero, P.E.
Bureau of Air Regulation

AAL/rbm

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit Renewal by:

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

DRAFT Permit Project No.: 0950111-021-AV
Renewal of Title V Air Operation Permit No.: 0950111-005-AV
Walt Disney World Resort Complex
Orange and Osceola Counties

INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT RENEWAL

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Walt Disney World Co., applied on July 8, 2002, to the permitting authority for a Title V Air Operation Permit Renewal for the Walt Disney World Resort Complex located at 1375 Buena Vista Drive, Lake Buena Vista, Orange and Osceola Counties.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212, 62-213, and 62-214. The above action is not exempt from permitting procedures. The permitting authority has determined that a Title V Air Operation Permit Renewal is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V Air Operation Permit Renewal based on the belief that reasonable assurances have been provided to indicate that operation of the Title V source will not adversely impact air quality, and the Title V source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT RENEWAL." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/922-6979), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C.. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

The permitting authority will issue the PROPOSED Permit, and subsequent FINAL Permit, in accordance with the conditions of the attached DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT RENEWAL." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, 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 of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those

entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application/request have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



A. A. Linero, P.E.
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE A TITLE V OPERATION PERMIT RENEWAL (including the PUBLIC NOTICE and the DRAFT Permit) and all copies were sent by certified mail before the close of business on 9/19/02 to the person(s) listed:

Mr. Lee Schmudde, V.P. and Responsible Official, Walt Disney World Co.
Mr. Steve Tucker, Designated Representative, Reedy Creek Energy Services, Inc.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE A TITLE V OPERATION PERMIT RENEWAL (including the PUBLIC NOTICE and Statement of Basis) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Rich Bumar, P.E., Walt Disney World Co.
Mr. Armando Rodriguez, Walt Disney World Co.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL (including the DRAFT Permit package) were sent by INTERNET E-mail on the same date to the person(s) listed:

Mr. Len Kozlov, FDEP, Central District Office
U.S. EPA, Region 4

9/19/02 cc: Bruce Mitchell
Reading File Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Friday 9/19/02
(Clerk) (Date)


SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Lee Schmulde
 V.P. and Responsible Official
 Walt Disney World Co.
 P.O. Box 10,000
 Lake Buena Vista, Florida
 32830-1000

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) _____ B. Date of Delivery _____

C. Signature **X**  Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below: _____

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label)
 7000 0600 0021 6524 3066

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

Article Sent To:
 Mr. Lee Schmulde, V.P.

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Name (Please Print Clearly) (to be completed by mailer)
 Mr. Lee Schmulde, V.P.
 Street, Apt. No., or P.O. Box No.
 P.O. Box 10,000
 City, State, ZIP+4
 Lake Buena Vista, Florida 32830-1000

PS Form 3800, July 1999 See Reverse for Instructions

7000 0600 0021 6524 3066

PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT RENEWAL

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Air Operation Permit Renewal
DRAFT Permit Project No.: 0950111-021-AV
Renewal to Title V Air Operation Permit No.: 0950111-005-AV

Walt Disney World Co.
Walt Disney World Resort Complex
Orange and Osceola Counties

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal to Walt Disney World Co. for the Walt Disney World Resort Complex located at 1375 Lake Buena Vista Drive, Lake Buena Vista, Orange and Osceola Counties. The applicant's name and address are: Mr. Lee Schumde, V.P. and Responsible Official, Walt Disney World Co., P.O. Box 10,000, Lake Buena Vista, Florida 32830-1000.

The permitting authority will issue the PROPOSED Permit, and subsequent FINAL Permit, in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application/request have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Affected District Office:

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

The complete project file includes the DRAFT Permit, the application, and the information submitted by the Responsible Official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

STATEMENT OF BASIS

**Walt Disney World Co.
Walt Disney World Resort Complex Renewal
Facility ID.: 0950111
Orange and Osecola Counties**

**Title V Air Operation Permit Renewal
Draft Permit No.: 0950111-021-AV
Renewal to Title V Air Operation Permit No.: 0950111-005-AV**

The initial Title V Air Operation Permit, No. 0950111-005-AV, was issued/effective on January 1, 1998. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This Title V Air Operation Permit Renewal is for the operation of the Walt Disney World Resort Complex. 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.

The facility is a complex of hotels, theme parks and support facilities, and a utility. The various air pollution sources are boilers, a combined cycle combustion turbine with a natural gas-fired heat recovery steam generator, paint spray booths and associated operations, external combustion oil heaters and hot water heaters.

The Walt Disney World Resort Complex (WDWRC) operates 120 stand-by/emergency generators that fire new No. 2 distillate diesel fuel oil (108), natural gas (11), or LP gas (1). Of these generators within the complex, 85 are assigned to the Walt Disney World Co. operations and 35 are assigned to the Reedy Creek Improvement District operations. See Attachment WDWRC for the break-down of these generators.

The Reedy Creek Energy Services, Inc., operates a combined cycle combustion turbine (CT) system followed by an associated natural gas-fired duct burner and a heat recovery steam generator (HRSG). It consists of a GE LM 5000 combustion turbine which powers a 38 MW (nominal rating) generator. Nitrogen oxide (NO_x) emissions are controlled by the use of water injection. The HRSG provides steam to power a nominal 8.5 MW steam turbine. The CT can be fired either by natural gas or No. 2 fuel oil. The duct burner can only be fired by natural gas. The compressor inlet air will be conditioned by an evaporative cooler and/or chilled water cooling coils when needed. A catalytic oxidation unit has been placed into service in the ductwork directly following the CT for CO control. Station emergency power will be provided by the Black Start Cummings No. 2 fuel oil fired emergency electric generator (which is exempt from permitting requirements: see Appendix I-1). The Reedy Creek Combined Cycle combustion turbine is regulated under Acid Rain, Phase II; NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rules 62-204.800(7)(b)38. & 62-204.800(7)(b)3., F.A.C., respectively; and, PSD-FL-014/014(A)/123, Prevention of Significant Deterioration (PSD), in Rule 62-212.400, F.A.C. Stack height: 65 feet, exit diameter: 11.1 feet, exit temperature: 285 °F, and, actual volumetric flow rate: 301,777 acfm. This unit began commercial operation April 1989. This emissions unit is also subject to Compliance Assurance Monitoring (CAM) requirements for CO (carbon monoxide). See Attachment CAM.

Carbon Monoxide (CO) is controlled or reduced by the use of a catalytic oxidation system, which is effectively a passive control system. The catalyst (stainless steel foil coated with calcined alumina with platinum metal) enhances the chemical reaction between oxygen and carbon monoxide and forms carbon dioxide as the end product. This reaction is greater than 80% efficient at 392° F (200° C) within minutes of gas turbine startup, before power generation begins. The catalyst normally operates at a temperature around 800° F (427° C) with corresponding CO removal efficiencies above 90%. The carbon monoxide removal efficiency increases as temperature increases up to the maximum operating limit of 1250° F (677° C). (Refer to the attached graph in Figure 1, which illustrates the carbon monoxide conversion efficiency at varying temperatures up to 500° C (932° F). This system is designed and certified by the manufacturer to operate while the plant is burning either natural gas or new No. 2 diesel fuel oil.

A plant operator occupies the plant control room 24 hours per day, which allows the plant personnel to monitor two key catalyst operating parameters. Namely, catalyst inlet temperature and pressure drop across the catalyst bed. A high temperature alarm is in place to alert the operator if the catalyst inlet temperature exceeds 1250° F (677° C) to protect the bed from thermal damage, and a high-pressure alarm sounds if the pressure drop across the catalyst bed exceeds 3" of water column. The pressure reading serves two purposes: to ensure that there is airflow across the bed, thus verifying that the system is operating, and to alert the plant operator if a possible plugging or fouling has occurred.

The key elements of the monitoring approach are presented in Table 1. The selected performance indicators are catalyst inlet temperature, pressure drop across the catalyst bed, and annual analysis of a catalyst test plug. The plant operator manually logs the temperature and the pressure drop once a day, monitors the alarms, and takes action if the readings are outside the allowable operating range. The test plug is analyzed annually to enable the catalyst manufacturer to certify the condition of the catalyst.

Thermocouples are located across the inlet to the catalytic oxidizer bed for monitoring the inlet temperature. These monitors/sensors were placed there to protect the catalyst; and, they are tied into an associated alarm system to alert the operator of high temperature readings. The manufacturer did not call for any thermocouples at the back of the catalyst bed, because they are not part of the design criteria for operation. However, there is only six (6) inches of room between the back of the bed and the super heaters; so, to install any of these monitors/sensors would require the removal of the bed.

Since installing the catalytic oxidizer for CO in late 1997, the actual annual CO emissions (based on AOR data) have been 5.09 tons/1998, 4.16 tons/1999, 3.93 tons/2000 and 3.24 tons/2001, which are 4.6%/1998, 3.8%/1999, 3.6%/2000 and 2.9%/2001, respectively, of the allowable standard (110 TPY). By interpolating the actual ton values to 8760 hours and assuming no control, then the values become 133 tons/1998, 113 tons/1999, 115 tons/2000 and 109 tons/2001. In addition, by comparing the differences of these values with the allowable standard, the minimum efficiency of the oxidizer required to meet the standard during these years are 21%/1998, 2.7%/1999, 4.5%/2000 and 0.0%/2001; and, another way of looking at these values is to access the number of days that the catalytic oxidizer would have had to operate to meet the standard during these years, which would be 77 days/1998, 10 days/1999, 16.5 days/2000, and none for 2001. Because of the high removal efficiencies, even during start-up, it is obvious that the allowable standard is easily met by just operating the catalytic oxidizer; and, if one only looks at the data from the 2001 operation, CAM would not be required.

Statement of Basis (cont.)
Walt Disney World Co.
Walt Disney World Resort Complex
Title V Air Operation Permit Renewal
DRAFT Permit No.: 0950111-021-AV
Page 3 of 4

The North Service Area Laundry consists of three (3) laundry boilers (Nos. 1, 2 & 3), which are manufactured by York-Shipley. Nos. 1 and 2 are rated at 300 horsepower (HP) and No. 3 is rated at 350 HP. The combined maximum total heat input of the three boilers is 39.6 MMBtu/hr from the firing of natural gas only. The laundry boilers are subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; and, they are regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators With Less Than 250 MMBtu Per Hour Heat Input.

Disney's Boardwalk Resort has two (2) boilers (Nos. BDW-1 & 2), which are manufactured by Cleaver Brooks, Model Nos. CBE-700-250. The boilers are each rated at 250 HP. The maximum heat input of each boiler is 10.46 MMBtu/hr from the firing of natural gas only. The boilers are subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; and, they are regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators With Less Than 250 MMBtu Per Hour Heat Input.

The construction landfill has two (2) diesel electric generators (Nos. 1 & 2). No. 1 is manufactured by Coleman/Cummings, Model No. 4BG; and, No. 2 is manufactured by Coleman/Kubota, Model No. CK05-15M/V1902-B61. The maximum heat input of No. 1 is 0.155 MMBtu/hr from the firing of only new No. 2 distillate fuel oil; and, the maximum heat input of No. 2 is 0.057 MMBtu/hr from the firing of only new No. 2 distillate fuel oil. The permitting of the diesel electric generators was under Rule 62-210.300, F.A.C., Permits Required.

The Reedy Creek Improvement District's EPOCH Central Energy Plant has two (2) identical 3,600 horsepower large bore diesel engines (Nos. EPCOT DG-1 & 2), manufactured by Stewart & Stevenson, Model Nos. S-20-645-E4B. Each engine is equipped with a 2.5 megawatt generator, Model TBGZHJ. Each generator provides peak demand reduction and emergency standby power. Each emissions unit is permitted to fire new No. 2 distillate fuel oil only. The sulfur content of the new No. 2 distillate fuel oil shall not exceed 0.5%, by weight. The firing of low sulfur fuel oil negates the need to conduct any SO₂ mass tests. Each emissions unit is allowed to operate 1900 hrs/yr.

At the North Service Area Dry Cleaning Plant, there is one perchloroethylene dry cleaning unit (No. 1). No. 1 is a Multimatic Atlas 45. The perchloroethylene dry cleaning unit is vented to a single exhaust stack with precleaning provided by a new chiller system followed by and in series with an existing carbon absorption system (an American Laundry Machinery, Inc.: Model PC 212 activated carbon vapor adsorber). The permittee recently upgraded the existing control system by installing a chiller system, which reduced the potential perchloroethylene emissions (1.5 TPY to 0.5 TPY) and load on the existing carbon absorption system. The perchloroethylene dry cleaning operation is subject to 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

At Disney's Animal Kingdom, specifically at the Necropsy Building, there is an animal crematory, a Crawford Model CD800 Animal Carcass Incinerator. This emissions unit is subject to the permitting requirements of Rule 62-296.401(1), F.A.C., Incinerators with a Charging Rate Less Than 50 Tons Per Day. The emissions unit's processing capacity shall not exceed 800 lbs per four-hour period (equivalent to 200 lbs/hr); and, the emissions unit's maximum heat input shall not exceed 3.0 MMBtu/hr while firing only natural gas. The emissions unit is allowed to operate continuously, i.e., 8760 hours per year. The design of the secondary chamber combustion zone shall be such that it has a minimum residence time of 1.0 seconds at 1800 degrees Fahrenheit (°F). The actual operating temperature of the secondary chamber combustion zone shall be no less than 1600 °F throughout the combustion process in the primary chamber. Cremation in the

Statement of Basis (cont.)
Walt Disney World Co.
Walt Disney World Resort Complex
Title V Air Operation Permit Renewal
DRAFT Permit No.: 0950111-021-AV
Page 4 of 4

primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1600 °F.

The crematory unit is permitted to incinerate only dead animals and, if applicable, the bedding and the remains associated with the animals placed in leak-proof containers. Containers may contain up to 0.5 percent by weight chlorinated plastics. Plastic bags used for the incineration of animals shall be nonchlorinated and no less than 3 mils thick. If containers are incinerated, documentation from the manufacturers certifying that they are composed of 0.5 percent or less by weight chlorinated plastics must be kept on-file at the site for the duration of their use and for at least five years after their use. This documentation must also be submitted with any application for renewal air operation permit. This emissions unit is not permitted to cremate dead animals which were used for medical or commercial experimentation. No other material, including biomedical waste* as defined in Rule 62-210.200, F.A.C. (see below), shall be incinerated.

* "Biomedical Waste": Any solid waste or liquid waste which may present a threat of infection to humans, including nonliquid tissue, body parts, blood, blood products, and body fluids from humans and other primates; laboratory and veterinary wastes which contain human disease-causing agents; and, discarded sharps. The following are also included:

- (a) Used absorbent materials saturated with blood, blood products, body fluids, or excretions or secretions contaminated with visible blood; and, absorbent materials saturated with blood or blood products that have dried.
- (b) Non-absorbent, disposable devices that have been contaminated with blood, body fluids, or secretions or excretions visibly contaminated with blood, but have not been treated by a method listed in Section 381.0098, F.S., or a method approved pursuant to Rule 64E-16, F.A.C.

Operators of the incinerator was trained by the equipment manufacturer's representatives. The content of the training program was submitted to the Department of Environmental Protection's Bureau of Air Regulation and approved, which met the criteria applicable to cremation set forth in the EPA Medical Waste Incinerator Operator Training Program Course Handbook, EPA 453/B-93-018, and Instructor's Guide, EPA 453/B-93-019. A copy of the training certificate for each operator having satisfactorily completed the Department-approved training program was submitted to the Department within 15 days of training; and, the owner of any new crematory units shall submit copies of the operator certificates within 15 days after completion of the initial compliance test pursuant to the unit's construction permit. An operator's certificate must be kept on file at the facility for the duration of the operator's employment and for an additional five years after termination of employment.

Also included in this permit are miscellaneous unregulated (paint spray booths, etc.) and insignificant emissions units/activities.

Based on the Title V permit application received July 8, 2002, this facility is a major source of hazardous air pollutants (HAPs).

Walt Disney World Co.
Walt Disney World Resort Complex
Facility ID No.: 0950111
Orange and Osceola Counties

Title V Air Operation Permit Renewal
DRAFT Permit Project No.: 0950111-021-AV
Renewal of Title V Air Operation Permit No.: 0950111-005-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979

Compliance Authority:

State of Florida
Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

**Title V Air Operation Permit Renewal
DRAFT Permit No.: 0950111-021-AV
Renewal of Title V Air Operation Permit No.: 0950111-005-AV**

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Permittee:

Walt Disney World Co.
P.O. Box 10,000
Orlando, Florida 32830-1000

DRAFT Permit No.: 0950111-021-AV

Facility ID No.: 0950111

SIC Nos.: 79, 7996

Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew Title V Air Operation Permit No. 0950111-005-AV. This permit renewal is for the operation of the Walt Disney World Resort Complex. 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 Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Appendix I-1, List of Insignificant Emissions Units and/or Activities

APPENDIX TV-4, TITLE V CONDITIONS (version dated 02/12/02)

APPENDIX SS-1, STACK SAMPLING FACILITIES (dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE (dated 10/07/96)

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AND MONITORING SYSTEMS PERFORMANCE REPORT (40 CFR 60, July 1996)

Phase II Acid Rain Application dated 08/05/2002

Alternate Sampling Procedure: ASP Number 97-B-01

Attachment WDWRC

Appendix CAM

Effective Date: January 1, 2003

Renewal Application Due Date: July 5, 2007

Expiration Date: December 31, 2007

Howard L. Rhodes, Director
Division of Air Resource Management

HLR/sms/bm

"More Protection, Less Process"

Printed on recycled paper.

Section I. Facility Information.

Subsection A. Facility Description.

The facility is a complex of hotels, theme parks and support facilities, and a utility. The various air pollution sources are boilers, a combined cycle combustion turbine with a natural gas-fired heat recovery steam generator, paint spray booths and associated operations, external combustion (thermal) oil heaters and hot water heaters.

Based on the Title V permit renewal application received July 8, 2002, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>E.U. ID No. (Facility ID No.)</u>	<u>Brief Description</u>
<u>North Service Area Dry Cleaning Plant</u>	
-001 (LDC-1)	Dry Cleaning Unit #1
<u>North Service Area (NSA)</u>	
-005 (NSA-17)	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
<u>Disney's Grand Floridian Hotel</u>	
-035 (GFR2 thru 18)	16 Hot Water Heaters
<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)	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 & Beach Club</u>	
-067 (YBC-3)	PSB
<u>EPCOT Center</u>	
-068 (EP-1 & 2)	PSBs
-070 (EP-3)	PSB
<u>South Service Area</u>	
-071 (SSA-1)	PSB

<u>E.U. ID No. (Facility ID No.)</u>	<u>Brief Description</u>
<u>Administrative Area</u>	
-072 (LAU-1 & 2)	2 Laundry Thermal Oil Heaters
<u>Magic Kingdom</u>	
-075 (MK-1)	PSB
<u>Reedy Creek Improvement District/EPCOT</u>	
-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
<u>Reedy Creek Improvement District</u>	
-081 (CEP-2)	Hot Water Heater
<u>Blizzard Beach</u>	
-083 (BB-1 thru 5)	5 Hot Water Heaters
<u>Reedy Creek Improvement District</u>	
-088 (CEP-1)	CCCT with natural gas fired Heat Recovery Steam Generator
<u>Boardwalk Resort</u>	
-090 (BDW-1 & 2)	2 Boilers
-091 (BDW-3 thru 10)	8 Hot Water Heaters
<u>Magic Kingdom</u>	
-092 (MK-3)	Hot Water Heater
-093 (MK-2)	PSB
<u>Boardwalk Resort</u>	
-094 (BR-1)	PSB
<u>Coronado Springs Resort</u>	
-095 (COS-1 thru 37)	37 Hot Water Heaters
<u>Stand-by/Emergency Generators</u>	
-101	120 Stand-by/Emergency Generators Firing #2 FO, NG or LP Gas
<u>Coronado Springs Resort</u>	
-102 (COS-41)	PSB
<u>Disney's Animal Kingdom</u>	
-103 (DAKU-1 thru 51)	51 Hot Water Heaters
<u>Necropsy Building</u>	
-112 (DAK-1)	Crawford Model CB800 Animal Crematory
<u>All Star Resort</u>	
-113 (ASR-2 thru 108)	107 Hot Water Heaters
-114 (ASR-1)	PSB
<u>Tree of Life Boiler</u>	
-115 (DAKU-52)	1.075 MMBtu/hr boiler firing NG
<u>Disney's MGM Studios Feature Animation Building</u>	
-117	2 PSBs
<u>NSA Monorail Building</u>	
-118 (NSA-20)	Monorail Trains PSB
<u>Disney's Animal Kingdom</u>	
-xxx	Maintenance PSB

Unregulated Emissions Units and/or Activities

{Permitting note: For Unregulated Emissions Units and/or Activities, see Appendix U-1 (attached).}

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s) on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Statement of Basis

These documents are on file with the permitting authority:

Initial Title V Permit issued December 31, 1997.

Renewal Application received July 8, 2002.

Request for additional information dated August 6, 2002.

Supplemental information received September 3, 2002.

Supplemental information received September 18, 2002, via e-mail.

Subsection D. Miscellaneous.

The use of 'Permitting Notes' throughout this permit are for informational purposes only and are not permit conditions.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.
{Permitting Note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
 2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; AC48-151472; AC48-151504; AC48-151506; AC48-151507; AC48-151509; AC48-151510; AC48-156346; AC48-166499; AC48-179648; AC48-179649; AC48-205018; AC48-243981; and, AO48-183381]
 3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
 4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434
- and,
- b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

{Permitting Note: Nothing was deemed necessary and ordered at this time.}

[Rule 62-296.320(1)(a), F.A.C.]

8. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility during operations include: chemical or water application to unpaved roads, unpaved yard areas, and storage piles; paving and maintenance of roads, parking areas and plant grounds; landscaping and planting of vegetation; confining abrasive blasting where possible; and other techniques, as necessary. Also, for the solid waste disposal area, wetting agents shall be applied.
[Rule 62-296.320(4)(c)2., F.A.C]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Central District office at the following address:

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155
Fax: 404/562-9163

12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS.)}

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

13. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

Miscellaneous

14. There shall be no discharges of liquid effluents or contaminated runoff to surface or ground water without approval from the Department.

[0950111-005-AV]

Section III. Emissions Units.

Subsection A. This section addresses the following emissions unit.

E.U. ID No./Facility ID No.	Brief Description
-088/CEP-1	Combined Cycle Combustion Turbine with a Natural Gas-Fired Duct Burner-Heat Recovery Steam Generator

This emissions unit is a combined cycle combustion turbine (CT) system followed by a natural gas-fired duct burner and a heat recovery steam generator (HRSG). It consists of a GE LM 5000 combustion turbine which powers a 38 MW (nominal rating) generator. Nitrogen oxide (NO_x) emissions are controlled by the use of water injection. The HRSG provides steam to power a nominal 8.5 MW steam turbine. The CT can be fired either by natural gas or No. 2 fuel oil. The duct burner can only be fired by natural gas. The compressor inlet air is conditioned by an evaporative cooler and/or chilled water cooling coils when needed. A catalytic oxidation unit has been placed into service in the ductwork directly following the CT for CO control. Station emergency power will be provided by the Black Start Cummings No. 2 fuel oil fired emergency electric generator (which is exempt from permitting requirements: see Appendix I-1).

{Permitting Notes: The emissions unit is regulated under NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rules 62-204.800(7)(b)38. & 62-204.800(7)(b)3., F.A.C., respectively; and, PSD-FL-014/014(A)/123, Prevention of Significant Deterioration (PSD), in Rule 62-212.400, F.A.C. Stack height: 65 feet, exit diameter: 11.1 feet, exit temperature: 285 °F, and, actual volumetric flow rate: 301,777 acfm. Commercial operation began in April 1989.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

[Permitting Note: Unless stated so, the following conditions apply to both the CT and HRSG.]

General

A.1. Definitions. For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee.
[40 CFR 60.2; Rule 62-204.800(7)(a), F.A.C.]

A.2. Circumvention. No owner or operator subject to the provisions of 40 CFR 60 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
[40 CFR 60.12]

A.3. Modifications. Except as provided under 40 CFR 60.14(e) and (f), any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of Section 11 of the Act. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere.

[40 CFR 60.14(a)]

Essential Potential to Emit (PTE) Parameters

A.4. Permitted Capacity. The maximum heat input to the Combustion Turbine (CT) and the duct burner, combined, shall not exceed 450 MMBtu/hr (normal duct burner heat input rate of 23 MMBtu/hr). When the CT is not in operation, the duct burner heat input rate shall not exceed 198 MMBtu/hr.

{Permitting Note: The heat input limitation has been placed in the permit to identify the capacity of the emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 40 CFR 60.332(b); and, 0950111-005-AV]

A.5. Emissions Unit Operating Rate Limitation After Testing. See specific condition A.49.
[Rule 62-297.310(2), F.A.C.]

A.6. Methods of Operation - Fuels.

a. Natural gas shall be the primary fuel fired in the CT. New No. 2 distillate fuel oil may be fired as "back-up" fuel in the CT, only. Only natural gas shall be fired in the duct burner. The burning of other fuels requires review, public notice, and approval through the preconstruction process (Chapters 62-210 and 62-212, F.A.C.).

b. New No. 2 distillate fuel oil can be used as a backup fuel in the CT, only, for a maximum of 336 hours per year.

[Rule 62-213.410, F.A.C.; and, 0950111-005-AV]

A.7. Hours of Operation. This emissions unit may operate continuously, i.e., 8760 hours per year.

[Rule 62-210.200(PTE), F.A.C.; 0950111-005-AV]

Emission Limitations and Standards

{Permitting Note: The averaging time for Specific Conditions Nos. A.8., A.9., A.11., A.12, and A.14. thru A.21., are based on the run time of the specified method, unless otherwise specified in this permit.}

A.8. Nitrogen Oxides. Nitrogen oxides emissions, expressed as NO_x, shall not exceed 82 ppm by volume at 15 percent oxygen and on a dry basis (132 lbs/hr) during conditions of peak loading (based on 40°F), or 68 ppm by volume at 15 percent oxygen and on a dry basis (100

lbs/hr) for a 12-month rolling average, or 17 tons per year, while burning new No. 2 distillate fuel oil. The 12-month rolling average emissions will be calculated using hourly averages during the month and then using consecutive monthly averages to obtain an annual average. The Department may alter this averaging method after due consideration of alternative compliance plans.

[0950111-005-AV]

A.9. Nitrogen Oxides. Nitrogen oxides emissions, expressed as NO_x, shall not exceed 74 ppm by volume at 15 percent oxygen and on a dry basis (112 lbs/hr) during conditions of peak loading (based on 40°F), or 58 ppm by volume at 15 percent oxygen and on a dry basis (77 lbs/hr) for a 12-month rolling average, or 280 tons per year, while burning natural gas. The 12-month rolling average emissions will be calculated using hourly averages of the combustion turbine and duct burner combined during the month and then using consecutive monthly averages to obtain an annual average. The Department may alter this averaging method after due consideration of alternative compliance plans. The duct burner NO_x emissions shall not exceed 4.6 lbs/hr at 23 MMBtu/hr heat input (corresponding to 0.20 lb/MMBtu) or 40 lbs/hr at 198 MMBtu/hr heat input (corresponding to 0.20 lb/MMBtu). The nitrogen oxides emissions standard apply at all times including periods of startup, shutdown, or malfunction.

[40 CFR 60.44b(a)(4), (h) & (i); and, 0950111-001-AC]

A.10. Nitrogen Oxides. Nitrogen oxides from the CT shall be controlled by water injection at a minimum of 0.6/1.0 water-to-fuel ratio (Reedy Creek Improvement District (RCID) will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize pollution control and meet the permitted emission limits.).

[0950111-005-AV]

A.11. Sulfur Dioxide. Sulfur dioxide emissions shall not exceed 58 ppm by volume at 15 percent oxygen and on a dry basis. The maximum allowed sulfur dioxide emissions shall not exceed 118 lbs/hr nor 20 tons per year, while burning new No. 2 distillate fuel oil.

[40 CFR 60.333(a); and, 0950111-005-AV]

A.12. Sulfur Dioxide. The maximum allowed sulfur dioxide emissions shall not exceed 1.2 lbs/hr nor 5.1 tons per year, while burning natural gas.

[0950111-005-AV]

A.13. Sulfur Dioxide - Sulfur Content. The sulfur content of the fuel oil fired by the stationary gas turbine may be used to determine compliance with 40 CFR 60.333(a). Under such circumstances, the permittee shall not fire in any stationary gas turbine any fuel which contains a sulfur content in excess of 0.4 percent, by weight.

[40 CFR 60.333(b); and, 0950111-005-AV]

A.14. Particulate Matter. Particulate matter shall not exceed 9 lbs/hr nor 2 tons per year, while burning new No. 2 distillate fuel oil.

[0950111-005-AV]

A.15. Particulate Matter. Particulate matter shall not exceed 0.8 lbs/hr nor 3.5 tons per year, while burning natural gas.

[0950111-005-AV]

A.16. Carbon Monoxide. Carbon monoxide emissions shall not exceed 24 lbs/hr nor 4 tons per year, while burning new No. 2 distillate fuel oil.
[0950111-005-AV]

A.17. Carbon Monoxide. Carbon monoxide emissions shall not exceed 25 lbs/hr nor 110 tons per year, while burning natural gas.
[0950111-005-AV]

A.18. Volatile Organic Compounds (VOCs). VOC emissions shall not exceed 6 lbs/hr nor 1 ton per year, while burning new No. 2 distillate fuel oil.
[0950111-005-AV]

A.19. Volatile Organic Compounds (VOCs). VOC emissions shall not exceed 6 lbs/hr nor 26 tons per year, while burning natural gas.
[0950111-005-AV]

A.20. Visible Emissions. Visible emissions shall not exceed 10 percent opacity while burning new No. 2 distillate fuel oil.
[0950111-005-AV]

A.21. Visible Emissions. Visible emissions shall not exceed 5 percent opacity while burning natural gas.
[0950111-005-AV]

Excess Emissions

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

A.22. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

A.23. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

A.24. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
[40 CFR 60.11(d)]

A.25. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

(1). *Nitrogen oxides*. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in 40 CFR 60.8 Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load during the period of excess emissions. There is no appreciable amount of fuel bound nitrogen in the natural gas.

[40 CFR 60.334(c)(1)]

Monitoring of Operations

A.26. At all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

A.27. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG, and using water injection to control NO_x emissions shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ± 5.0 percent and shall be approved by the Administrator.

[40 CFR 60.334(a)]

A.28. 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 turbine (CT).

(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 D3246-83, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2), or the latest edition(s).

(b) 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 (lbs/hr) and shall be consistent with the limits specified in Specific Condition 5 of permit AC48-137740 (see specific conditions **A.11.** & **A.12.** of this permit).

- (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 **(five)** 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 analysis.

[40 CFR 60.334(b)(2); and, 0950111-005-AV]

A.29. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG, shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

- (1) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.
- (2) If the turbine is supplied its fuel without intermediate bulk storage, the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with 40 CFR 60.334(b).

[40 CFR 60.334(b)(1) & (2)]

A.30. The owner or operator of an affected facility (HRSG) which is subject to the nitrogen oxides standards of 40 CFR 60.44b(a)(4) is not required to install or operate a continuous monitoring system to measure nitrogen oxides emissions. See specific condition **A.9**.

[40 CFR 60.48b(h)]

A.31. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Continuous Monitoring Requirements

A.32. For the purposes of 40 CFR 60.13, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of 40 CFR 60.13 upon promulgation of performance specifications for continuous monitoring systems under Appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, Appendix F of 40 CFR 60, unless otherwise specified in an applicable subpart or by the Administrator. Appendix F is applicable December 4, 1987.

[40 CFR 60.13(a)]

A.33. All continuous monitoring systems (CMS) or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. For CMS other than opacity, 1-hour averages shall be computed from four or more data points equally spaced over each 1-hour period. Data recorded during periods of CMS breakdowns, repairs, calibration checks, and zero span adjustments shall not be included in the data averages computed under this paragraph.

[40 CFR 60.13(f) and 60.13(h)]

Compliance Assurance Monitoring (CAM) Requirements

A.34. This emissions unit is subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.

[40 CFR 64; and, Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Test Methods and Procedures

A.35. Subsequent to the initial test, annual stack testing for CO emissions at full capacity load conditions shall be performed according to an annual test protocol developed jointly by RCID and FDEP. This protocol will specify the test methods and procedures to be used during the annual compliance testing. Using the established procedures of this protocol as a guide, simultaneous testing full capacity load conditions shall be conducted for CO, NO_x and VE. EPA Method 10 shall be used for CO, EPA Method 7E or 20 shall be used for NO_x, and EPA Method 9 shall be used for VE. Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO. The test methods shall be in accordance with Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A.

[40 CFR 60.44b(a); Rules 62-213.440 and 62-297.401, F.A.C.; and, 0950111-005-AV]

A.36. Nitrogen Oxides. To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Department to determine the nitrogen content of the fuel being fired.

[40 CFR 60.335(a)]

A.37. Nitrogen Oxides. The owner or operator shall determine compliance with the nitrogen oxides NSPS standard in 40 CFR 60.332 as follows:

(1) The nitrogen oxides emission rate (NO_x) shall be computed for each run using the following equation:

$$\text{NO}_x = (\text{NO}_{x0}) (P_r/P_o)^{0.5} e^{19(\text{H}_o - 0.00633)} (288^\circ\text{K}/T_a)^{1.53}$$

where:

NO_x = emission rate of NO_x at 15 percent O_2 and ISO standard ambient conditions, volume percent.

NO_{x0} = observed NO_x concentration, ppm by volume.

P_r = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.

P_o = observed combustor inlet absolute pressure at test, mm Hg.

H_o = observed humidity of ambient air, g $\text{H}_2\text{O}/\text{g}$ air.

e = transcendental constant, 2.718.

T_a = ambient temperature, $^\circ\text{K}$.

[40 CFR 60.335(c)(1)]

A.38. The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the permitted NO_x standard at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations.

{Permitting Note: The initial compliance test and all subsequent annual compliance tests determine the proper water-to-fuel ratio (W/F ratio), the continuous monitoring system (CMS) does not. In addition to other information, the CMS records the average W/F ratio hourly to demonstrate the minimum W/F ratio is maintained. The equation in specific condition A.36. will be used for load corrections to ISO conditions in place of equations supplied by the manufacturer.}

[40 CFR 60.335(c)(2)]

A.39. Nitrogen Oxides and Sulfur Dioxide. The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:

(3). EPA Method 7E or 20 (40 CFR 60, Appendix A) shall be used to determine the nitrogen oxides; and, EPA Method 20 (40 CFR 60, Appendix A) shall be used to determine the sulfur dioxide and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO_x emissions shall be determined at each of the load conditions specified in 40 CFR 60.335(c)(2).
[40 CFR 60.335(c)(3); and, 0950110-002-AC]

A.40. Sulfur Dioxide - Sulfur Content. The owner or operator shall determine compliance with the sulfur content standard of 0.4 percent, by weight, as follows: ASTM D 2880-96 (which includes ASTM D 4294), or the latest edition, shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, D 3246-92, or the latest edition, shall be used for the sulfur content of gaseous fuels (incorporated by reference-see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.
[40 CFR 60.335(d) and 60.17]

A.41. Nitrogen and Sulfur Contents. To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335(a) and 40 CFR 60.335(d) of 40 CFR 60.335 to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.
[40 CFR 60.335(e)]

A.42. Carbon Monoxide. EPA Method 10 pursuant to Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A, shall be used to determine compliance with the carbon monoxide standards in specific conditions **A.16. & A.17.**

A.43. Visible Emissions. EPA Method 9 pursuant to Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A, shall be used to determine compliance with the visible emissions standard in specific conditions **A.20. & A.21.**
[Rule 62-297.401, F.A.C.; and, 40 CFR 60, Appendix A]

A.44. Opacity. Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.
[40 CFR 60.11(a)]

A.45. Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

[40 CFR 60.8(c)]

A.46. The owner or operator shall provide, or cause to be provided, stack sampling and performance testing facilities as follows:

- (1) Sampling ports adequate for test methods applicable to such facilities.
- (2) Safe sampling platform(s).
- (3) Safe access to sampling platform(s).
- (4) Utilities for sampling and testing equipment.

[40 CFR 60.8(e)(1), (2), (3) & (4); and, 0950111-005-AV]

A.47. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

A.48. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.49. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(a), F.A.C.]

A.50. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

A.51. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
2. Opacity Compliance Tests. When either EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

[Rule 62-297.310(4), F.A.C.]

A.52. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or,
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;

- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and,
 - c. Each NESHAP pollutant, if there is an applicable emission standard.
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- (b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

A.53. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or,
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

Recordkeeping and Reporting Requirements

A.54. To determine compliance with the oil firing heat input limitation, the permittee shall maintain daily records of fuel oil consumption and hourly usage for the turbine and the average heating value for the fuel oil. Average fuel oil heating rate shall be the calendar year annual average higher heating value of No. 2 fuel oil purchased for the permittee's bulk fuel oil storage facility. All records shall be maintained for a minimum of five (5) years after the date of each record and shall be made available to representatives of the Department upon request.

[Rule 62-213.440, F.A.C.]

A.55. The owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification as follows:

(4) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

[40 CFR 60.7(a)(4)]

A.56. The owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or, any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

A.57. The owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report and/or a summary report form [see 40 CFR 60.7(d)] to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or, the CMS data are to be used directly for compliance determination, in which case quarterly reports shall be submitted; or, the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each calendar half (or quarter, as appropriate). Written reports of excess emissions shall include the following information:

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

(3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

(4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

[40 CFR 60.7(c)(2), (3), & (4)]

A.58. The summary report form shall contain the information and be in the format shown in Figure 1 (attached) unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility.

(1) If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator.

(2) If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.
[40 CFR 60.7(d)(1) & (2)]

{See attached Figure 1: Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance} (electronic file name: figure1.doc)

A.59. (1) Notwithstanding the frequency of reporting requirements specified in 40 CFR 60.7(c), an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:

- (i) For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods) the affected facility's excess emissions and monitoring systems reports submitted to comply with a standard under this part continually demonstrate that the facility is in compliance with the applicable standard;
- (ii) The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in 40 CFR 60, Subpart A, and the applicable standard; and,
- (iii) The Administrator does not object to a reduced frequency of reporting for the affected facility, as provided in 40 CFR 60.7(e)(2). The frequency of reporting of excess emissions and monitoring systems performance (and summary) reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the required recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

(3) As soon as monitoring data indicate that the affected facility is not in compliance with any emission limitation or operating parameter specified in the applicable standard, the frequency of reporting shall revert to the frequency specified in the applicable standard, and the owner or operator shall submit an excess emissions and monitoring systems performance report (and summary report, if required) at the next appropriate reporting period following the noncomplying event. After demonstrating compliance with the applicable standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard as provided for in 40 CFR 60.7(e)(1) & (e)(2).

[40 CFR 60.7(e)(1)]

A.60. The owner or operator subject to the provisions of 40 CFR 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and, all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least **5 (five)** years following the date of such measurements, maintenance, reports, and records. [40 CFR 60.7(f); and, Rule 62-213.440(1)(b)2.b., F.A.C.]

A.61. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

A.62. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.

16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.

17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.

18. All measured and calculated data required to be determined by each applicable test procedure for each run.

19. The detailed calculations for one run that relate the collected data to the calculated emission rate.

20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

A.63. Reports under 40 CFR 60.7(c) are required for periods of NO_x excess emissions, which are defined in specific condition **A.25**.

[40 CFR 60.334(c)(1)]

A.64. Submit a quarterly report for each emissions unit for the following within 30 days at the end of each quarter:

a. Total hours of operation.

b. Per 40 CFR 60.334(c)(1) for NO_x, any one hour period in which the water to fuel ratio falls below 0.6/1.0 or the value determined during the latest compliance tests of modification 0950111-002-AC, whichever is the larger numerical fraction.

[Rule 62-213.400, F.A.C.; and, 0950111-005-AV]

A.65. HRSG. The owner or operator of an affected facility (HRSG) subject to the nitrogen oxides standards under 40 CFR 60.44b shall maintain records of the following information for each steam generating unit operating day:

(1) Calendar date.

[40 CFR 60.49b(g)(1)]

Section III. Emissions Units.

Subsection B. This section addresses the following emissions units.

E.U./Facility I.D.	Brief Description	Manufacturer	Model
<u>North Service Area Laundry</u>			
-020/LBB-1a	Laundry Boiler #1	York-Shipley	300HP
-021/LBB-1b	Laundry Boiler #2	York-Shipley	300HP
-022/LBB-1c	Laundry Boiler #3	York-Shipley	350HP
<u>Disney's Boardwalk Resort</u>			
-090/BDW-1	Boiler	Cleaver Brooks	CBE-700-250
-090/BDW-2	Boiler	Cleaver Brooks	CBE-700-250

[Permitting Notes: The laundry boilers are subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; and, the other boilers are regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators With Less Than 250 MMBtu Per Hour Heat Input.]

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation rates are as follows:

E.U./Facility I.D.	Brief Description	Permitted Capacity
<u>North Service Area Laundry</u>		
		<u>MMBtu/hr Heat Input</u>
-020/LBB-1a	Laundry Boiler #1	39.6 (total: #1, #2 & #3)
-021/LBB-1b	Laundry Boiler #2	39.6 (total: #1, #2 & #3)
-022/LBB-1c	Laundry Boiler #3	39.6 (total: #1, #2 & #3)
<u>Disney's Boardwalk Resort</u>		
		<u>MMBtu/hr Heat Input</u>
-090/BDW-1	Boiler	10.46
-090/BDW-2	Boiler	10.46

{Permitting Note: The heat input limitation has been placed in the permit to identify the capacity of the emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}

[Rule 62-210.200(PTE); AC48-271849; and, 0950111-005-AV]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.11**.
[Rule 62-297.310(2), F.A.C.; and, 0950111-005-AV]

B.3. Methods of Operation - Fuels. For the North Service Area Laundry and Disney's Boardwalk Resort boilers, the only fuel allowed to be fired is natural gas.
[Rules 62-296.406(2) & (3), F.A.C.; AC48-271849; and, 0950111-005-AV]

B.4. Hours of Operation. The emissions units may operate continuously, i.e., 8760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, 0950111-005-AV]

Emission Limitations and Standards

B.5. Visible Emissions. See specific condition **B.10**.

- a. Visible emissions from each laundry boiler shall not exceed 5% opacity.
- b. Visible emissions from each Boardwalk Resort boiler shall not exceed 20% opacity, except for one 6-minute period per hour during which opacity shall not exceed 27%.

{Permitting Note: The averaging time for this condition is based on the run time of the specified method, unless otherwise specified in this permit.}

[Rules 62-296.406(1) and 62-296.320(4)(b)1., F.A.C.; AC48-271849; and, 0950111-005-AV]

B.6. Particulate Matter and Sulfur Dioxide. From the steam boilers, particulate matter and sulfur dioxide emissions shall be controlled by the firing of natural gas or propane.
[Rule 62-296.406(2) & (3), F.A.C.; and, 0950111-005-AV]

Excess Emissions

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

B.7. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

B.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.9. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

B.10. Visible emissions. See specific condition **B.5.**

a. For the laundry boilers, the diesel electric generators, and the Boardwalk Resort boilers, the test method shall be EPA Method 9, in accordance with Chapter 62-297, F.A.C.

b. The visible emissions shall be conducted for 60-minutes for each boiler.

[Rules 62-213.440, 62-296.320(4)(b)4., and 62-297.401, F.A.C.; and, 0950111-005-AV]

B.11. **Operating Rate During Testing.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

B.12. Applicable Test Procedures.

(a) Required Sampling Time.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2.c., F.A.C.]

B.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard (see specific condition **B.14.**);

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

B.14. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning (see specific condition **B.13.(a)4.a.**):

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

Recordkeeping and Reporting Requirements

B.15. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

B.16. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
[Rule 62-297.310(8), F.A.C.]

B.17. For each emissions unit, the permittee shall maintain a monthly log of the hours operated and the amount of fuel fired.
[Rules 62-4.070 and 62-213.440, F.A.C.; and, 0950111-005-AV]

B.18. The type of fuel and the heat input to each emissions unit shall be included on the visible emissions test report.
[Rule 62-213.440, F.A.C.; and, 0950111-005-AV]

B.19. The owner or operator of each affected emissions unit (laundry boilers) shall record and maintain records of the amounts of natural gas combusted during each day. The records shall be retained for a period of at least five years following the date of such record.
[40 CFR 60.48c(g) & (h); and, Rule 62-213.440, F.A.C.]

Section III. Emissions Units.

Subsection C. This section addresses the following emissions units.

E.U./Facility I.D.	Brief Description	Manufacturer	Model
<u>EPOCH Central Energy Plant</u>			
-079/(EPCOT DG-1)	Diesel Electric Generator #1 (2.5 MW)	Stewart & Stevenson	S-20-645-E4B
-080/(EPCOT DG-2)	Diesel Electric Generator #2 (2.5 MW)	Stewart & Stevenson	S-20-645-E4B

These emissions units are identical 3,600 horsepower large bore diesel engines, with each one equipped with a 2.5 megawatt generator, Model TBGZHJ. Each generator provides peak demand reduction and emergency standby power. Each emissions unit is permitted to fire new No. 2 distillate fuel oil only.

[Permitting Notes: The diesel electric generators were issued permits pursuant to Rule 62-210.300, Permits Required.]

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacity. The maximum operation rates are as follows:

E.U./Facility I.D.	Brief Description	Permitted Capacity
<u>Reedy Creek Improvement District</u>		<u>megawatts/hr</u>
-079/(EPCOT DG-1)	Diesel Electric Generator #1 (2.5 MW)	2.5
-080/(EPCOT DG-2)	Diesel Electric Generator #2 (2.5 MW)	2.5

{Permitting Note: The megawatt limitation has been placed in the permit to identify the capacity of the emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}

[Rule 62-210.200(PTE), F.A.C.; and, 0950111-005-AV]

C.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition C.18.

[Rule 62-297.310(2), F.A.C.]

C.3. Methods of Operation - Fuels. The only fuel allowed to be fired is new No. 2 distillate fuel oil.

[Rule 62-213.410, F.A.C.; and, 0950111-005-AV]

C.4. Hours of Operation. Each emissions unit is allowed to operate 1900 hrs/yr.

[Rule 62-210.200(PTE), F.A.C.; and, 0950111-005-AV]

Emission Limitations and Standards

{Permitting Note: The averaging time for Specific Conditions Nos. C.5. and C.6. are based on the run time of the specified method, unless otherwise specified in this permit.}

C.5. Visible Emissions.

a. Visible emissions from each diesel electric generator shall be less than 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C.; and, 0950111-016-AC]

C.6. The allowable pollutant emissions from each diesel electric generator shall not exceed the following:

Pollutant	lbs/hr	TPY
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

[0950111-005-AV]

C.7. **Sulfur Dioxide - Sulfur Content.** The sulfur content of the new No. 2 distillate fuel oil shall not exceed 0.5%, by weight. Firing low sulfur fuel oil negates the need to conduct any SO₂ mass tests. See specific conditions C.11. and C.15.

[0950111-005-AV]

Excess Emissions

C.8. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

C.9. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

C.10. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

C.11. Monitoring - Fuel Oil. The fuel oil shall be analyzed each time fuel oil is transferred to the storage tank. In lieu of conducting sampling and analysis at the time of each delivery of new fuel oil, the permittee can accept a fuel oil analysis from the vendor upon each delivery and the records shall be retained for a minimum of 5 years. See specific conditions C.7. and C.15.

[Rule 62-213.440, F.A.C.; and, 0950111-005-AV]

Test Methods and Procedures

C.12. Visible emissions.

a. For the diesel electric generators, the test method shall be EPA Method 9 in accordance with Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)4. and 62-297.401, F.A.C.; and, 0950111-005-AV]

C.13. Particulate Matter. EPA Method 5 shall be used to demonstrate compliance with particulate matter emissions limit in accordance with Chapter 62-297, F.A.C., if the visible emissions are equal to or greater than 20% opacity. If a test is required, then a visible emissions test shall be conducted concurrently with each particulate matter emissions test.

[Rule 62-297.401, F.A.C.; and, 0950111-005-AV]

C.14. Nitrogen Oxides (NO_x). Annually, EPA Method 20 shall be used to demonstrate compliance with the NO_x emissions limit in accordance with Chapter 62-297, F.A.C. A visible emissions test shall be conducted concurrently with each NO_x emissions test.

[Rule 62-297.401, F.A.C.; and, 0950111-005-AV]

C.15. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition. See specific conditions C.7. and C.11.

[Rules 62-213.440 and 62-297.440, F.A.C.; and, 0950111-005-AV]

C.16. Carbon Monoxide. The firing of low sulfur fuel oil and proper operation of the emissions units negates the need to conduct a mass emissions test for carbon monoxide.

[Rule 62-297.310(7), F.A.C.; and, 0950111-005-AV]

C.17. Volatile Organic Compounds. The firing of low sulfur fuel oil and proper operation of the emissions units negates the need to conduct a mass emissions test for volatile organic compounds.

[Rule 62-297.310(7), F.A.C.; and, 0950111-005-AV]

C.18. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

C.19. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

C.20. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

C.21. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

C.22. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and,
- c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

C.23. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning only liquid fuel(s) for less than 400 hours per year. See specific conditions C.22.(a)3., 4., & 5.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Record keeping and Reporting Requirements

C.24. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

C.25. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.

17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.

18. All measured and calculated data required to be determined by each applicable test procedure for each run.

19. The detailed calculations for one run that relate the collected data to the calculated emission rate.

20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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

C.26. For each emissions unit, the permittee shall maintain a log of the hours operated and the amount of fuel fired.

[Rules 62-4.070 and 62-213.440, F.A.C.]

C.27. The amount of fuel fired and the megawatt output from each emissions unit shall be included on the visible emissions test report.

[Rule 62-213.440, F.A.C.; and, 0950111-016-AC]

Section III. Emissions Unit(s) and Conditions.

Subsection D. This section addresses the following emissions unit.

E.U./Facility I.D.	Brief Description	Manufacturer
North Service Area Dry Cleaning Plant -001/(LDC-1)	Dry Cleaning Unit #1	Multimatic Machine

There is one perchloroethylene dry cleaning unit (#1). #1 is a Multimatic Atlas 45. The perchloroethylene dry cleaning unit is vented to a single exhaust stack with precleaning provided by a new chiller system followed by and in series with an existing carbon absorption system (a American Laundry Machinery, Inc.: Model PC 212 activated carbon vapor adsorber). The permittee recently upgraded the existing control system by installing a chiller system, which reduced the potential perchloroethylene emissions (1.5 TPY to 0.5 TPY) and load on the existing carbon absorption system.

{Permitting Note(s): The perchloroethylene dry cleaning operation is subject to 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.}

The following specific conditions apply to the emissions units listed above:

Standards

D.1. The permittee of each existing dry cleaning system shall comply with either 40 CFR 63.322(a)(1) or (a)(2).

- (1) Route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device.
- (2) Route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a carbon adsorber installed in the dry cleaning machine prior to September 22, 1993.

[40 CFR 63.322(a)(1) & (2)]

D.2. The permittee shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times.

[40 CFR 63.322(c)]

D.3. The permittee of each dry cleaning system shall operate and maintain the system according to the manufacturers' specifications and recommendations.

[40 CFR 63.322(d)]

D.4. Each refrigerated condenser used for the purposes of complying with 40 CFR 63.322(a) or (b) and installed on a dry-to-dry machine, dryer, or reclaimer:

- (1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating;
 - (2) Shall be monitored according to 40 CFR 63.323(a)(1); and
 - (3) Shall be operated with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- [40 CFR 63.322(e)(1), (2), & (3)]

D.5. Each refrigerated condenser used for the purpose of complying with 40 CFR 63.322(a) and installed on a washer:

- (1) Shall be operated to not vent the air-perchloroethylene gas-vapor contained within the washer to the atmosphere until the washer door is opened;
 - (2) Shall be monitored according to 40 CFR 63.323(a)(2).
- [40 CFR 63.322(f)(1) & (2)]

D.6. Each carbon adsorber used for the purposes of complying with 40 CFR 63.322(a) or (b):

- (1) Shall not be bypassed to vent or release any air-perchloroethylene gas-vapor stream to the atmosphere at any time; and
 - (2) Shall be monitored according to the applicable requirements in 40 CFR 63.323(b) or (c).
- [40 CFR 63.322(g)(1) & (2)]

D.7. The permittee of an affected facility shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks.

[40 CFR 63.322(j)]

D.8. The permittee of a dry cleaning system shall inspect the following components weekly for perceptible leaks while the dry cleaning system is operating:

- (1) Hose and pipe connections, fittings, couplings, and valves;
- (2) Door gaskets and seatings;
- (3) Filter gaskets and seatings;
- (4) Pumps;
- (5) Solvent tanks and containers;
- (6) Water separators;
- (7) Muck cookers;
- (8) Stills;
- (9) Exhaust dampers;
- (10) Diverter valves; and
- (11) Cartridge filter housings.

[40 CFR 63.322(k)(1) thru (11)]

D.9. The permittee of a dry cleaning system shall repair all perceptible leaks detected under 40 CFR 63.322(k) within 24 hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a leak. Such repair parts shall be installed within 5 working days after receipt.

[40 CFR 63.322(m)]

D.10. If parameter values monitored under 40 CFR 63.322(e), (f), or (g), do not meet the values specified in 40 CFR 63.323(a), (b), or (c), adjustments or repairs shall be made to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for such parts shall be initiated within 2 working days of detecting such a parameter value. Such repair parts shall be installed within 5 working days after receipt.
[40 CFR 63.322(n)]

Test Methods and Monitoring

D.11. When a refrigerated condenser is used to comply with 40 CFR 63.322(a)(1) or (b)(1):

(1) The permittee shall measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaiming weekly with a temperature sensor to determine if it is equal to or less than 7.2° C (45° F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2° C (45° F) to an accuracy of $\pm 1.1^{\circ}$ C ($\pm 2^{\circ}$ F).

(2) The permittee shall calculate the difference between the temperature of the air-perchloroethylene gas-vapor stream entering the refrigerated condenser on a washer and the temperature of the air-perchloroethylene gas-vapor stream exiting the refrigerated condenser on the washer weekly to determine that the difference is greater than or equal to 11.1° C (20° F).

(i) Measurements of the inlet and outlet streams shall be made with a temperature sensor. Each temperature sensor shall be used according to the manufacturer's instructions, and designed to measure at least a temperature range from 0° C (32° F) to 48.9° C (120° F) to an accuracy of $\pm 1.1^{\circ}$ C ($\pm 2^{\circ}$ F).

(ii) The difference between the inlet and outlet temperatures shall be calculated weekly from the measured values.

[40 CFR 63.323(a)(1) & (2)]

D.12. When a carbon adsorber is used to comply with 40 CFR 63.322(a)(2) or exhaust is passed through a carbon adsorber immediately upon machine door opening to comply with 40 CFR 63.322(b)(3), the permittee shall measure the concentration of perchloroethylene in the exhaust of the carbon adsorber weekly with a colorimetric detector tube, while the dry cleaning machine is venting to that carbon adsorber at the end of the last dry cleaning cycle prior to desorption of that carbon adsorber to determine that the perchloroethylene concentration in the exhaust is equal to or less than 100 parts per million by volume. The permittee shall:

(1) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of perchloroethylene in air to an accuracy of ± 25 parts per million by volume; and

(2) Use the colorimetric detector tube according to the manufacturer's instructions; and

(3) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet, or outlet.

[40 CFR 63.323(b)(1), (2) & (3)]

D.13. If the air-perchloroethylene gas-vapor stream is passed through a carbon adsorber prior to machine door opening to comply with 40 CFR 63.322(b)(3), the permittee of an affected facility shall measure the concentration of perchloroethylene in the dry cleaning machine drum at the end of the dry cleaning cycle weekly with a colorimetric detector tube to determine that the perchloroethylene concentration is equal to or less than 300 parts per million by volume. The permittee shall:

- (1) Use a colorimetric detector tube designed to measure a concentration of 300 parts per million by volume of perchloroethylene in air to an accuracy of ± 75 parts per million by volume; and
- (2) Use the colorimetric detector tube according to the manufacturer's instructions; and
- (3) Conduct the weekly monitoring by inserting the colorimetric detector tube into the open space above the articles at the rear of the dry cleaning machine drum immediately upon opening the dry cleaning machine door.

[40 CFR 63.323(c)(1), (2) & (3)]

D.14. When calculating yearly perchloroethylene consumption for the purpose of demonstrating applicability according to 40 CFR 63.320, the permittee shall perform the following calculation on the first day of every month:

- (1) Sum the volume of all perchloroethylene purchases made in each of the previous 12 months, as recorded in the log described in 40 CFR 63.324(d)(1).
- (2) If no perchloroethylene purchases were made in a given month, then the perchloroethylene consumption for that month is zero gallons.
- (3) The total sum calculated in 40 CFR 63.323(d) is the yearly perchloroethylene consumption at the facility.

[40 CFR 63.323(d)(1), (2) & (3)]

Recordkeeping and Reporting Requirements

D.15. Each permittee of a dry cleaning facility shall submit an initial report signed by a responsible official before a notary public certifying that the information provided in the initial report is accurate and true to the Permitting authority within 90 calendar days after September 22, 1993, which includes the following:

- (1) The name and address of the permittee;
- (2) The address (that is, physical location) of the dry cleaning facility;
- (3) A brief description of the type of each dry cleaning machine at the dry cleaning facility;
- (4) Documentation as described in 40 CFR 63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to 40 CFR 63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with 40 CFR 63.320; and
- (5) A description of the type of control device(s) that will be used to achieve compliance with 40 CFR 63.322(a) or (b) and whether the control device(s) is currently in use or will be purchased.
- (6) Documentation to demonstrate to the Permitting authority's satisfaction that each room enclosure used to meet the requirements of 40 CFR 63.322(a)(3) meets the requirements of 40 CFR 63.322(a)(3)(i) and (ii).

[40 CFR 63.324(a)(1) thru (6)]

D.16. Each permittee of a dry cleaning facility shall submit a statement signed by a responsible official in the presence of a notary public to the Permitting authority by registered letter on or before the 30th day following the compliance dates specified in 40 CFR 63.320(b) or (c), certifying the following:

- (1) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to 40 CFR 63.323(d);
 - (2) Whether or not they are in compliance with each applicable requirement of 40 CFR 63.322; and
 - (3) All information contained in the statement is accurate and true.
- [40 CFR 63.324(b)(1), (2) & (3)]

D.17. Each permittee of a dry cleaning facility shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of 5 years:

- (1) The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchases; if no perchloroethylene is purchased during a given month then the permittee would enter zero gallons into the log;
- (2) The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month as specified in 40 CFR 63.323(d);
- (3) The dates when the dry cleaning system components are inspected for perceptible leaks, as specified in 40 CFR 63.322(k) or (l), and the name or location of dry cleaning system components where perceptible leaks are detected;
- (4) The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with 40 CFR 63.322(m) and (n);
- (5) The date and temperature sensor monitoring results, as specified in 40 CFR 63.323 if a refrigerated condenser is used to comply with 40 CFR 63.322(a) or (b); and
- (6) The date and colorimetric detector tube monitoring results, as specified in 40 CFR 63.323, if a carbon adsorber is used to comply with 40 CFR 63.322(a)(2) or (b)(3).

[40 CFR 63.324(d)(1) thru (6)]

D.18. Each permittee of a dry cleaning facility shall retain on-site a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility.

[40 CFR 63.324(e)]

Section III. Emissions Unit(s) and Conditions.

Subsection E. This section addresses the following emissions unit.

E.U. ID No./Facility ID No.	Brief Description
-112/DAK-1	Disney's Animal Kingdom Animal Crematory: Necropsy Building

This emissions unit is an animal crematory, a Crawford Model CD800 Animal Carcass Incinerator, located at Disney's Animal Kingdom, specifically at the Necropsy Building.

{Permitting Notes: This emissions unit is subject to the permitting requirements of Rule 62-296.401(1), F.A.C., Incinerators with a Charging Rate Less Than 50 Tons Per Day.}

Essential Potential to Emit (PTE) Parameters

E.1. Permitted Capacity.

- a. The emissions unit's processing capacity shall not exceed 800 lbs per four-hour period (equivalent to 200 lbs/hr); and,
 - b. The emissions unit's maximum heat input shall not exceed 3.0 MMBtu/hr while firing only natural gas.
- [Rules 62-4.070, 62-4.160(2), 62-296.401(1), and 62-297.310(2)(b), F.A.C.]

E.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition E.28.
[Rule 62-297.310(2), F.A.C.]

E.3. Hours of operation. The emissions unit is allowed to operate continuously, i.e., 8760 hours per year.
[Rule 62-21.200, Definitions - Potential to Emit (PTE), F.A.C.]

E.4. Methods of Operation - Fuels. The only fuel authorized to be burned is natural gas.
[Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The averaging time for Specific Conditions Nos. E.5. thru E.7. are based on the run time of the specified method, unless otherwise specified in this permit.}

E.5. Visible emissions. No visible emissions (5 percent opacity) except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one-hour period.
[Rule 62-296.401(1)(a), F.A.C.]

E.6. Particulate matter. Particulate matter emissions shall not exceed 0.080 grains per dry standard cubic foot of flue gas, corrected to 7% O₂.
[Rule 62-296.401(6)(a), F.A.C.]

E.7. Carbon monoxide. Carbon monoxide (CO) emissions shall not exceed 100 parts per million by volume (ppmv), dry basis, corrected to 7% O₂ on an hourly average basis.
[Rule 62-296.401(6)(b), F.A.C.]

E.8. Operation Residence Time and Temperature(s). The design of the secondary chamber combustion zone shall be such that it has a minimum residence time of 1.0 seconds at 1800 degrees Fahrenheit (°F). The actual operating temperature of the secondary chamber combustion zone shall be no less than 1600 °F throughout the combustion process in the primary chamber. Cremation in the primary chamber shall not begin unless the secondary chamber combustion zone temperature is equal to or greater than 1600 °F.
[Rule 62-296.401(6)(c), F.A.C.]

Excess Emissions

E.9. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

E.10. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Operations

E.11. This emissions unit is permitted to incinerate only dead animals and, if applicable, the bedding and the remains associated with the animals placed in leak-proof containers. Containers may contain up to 0.5 percent by weight chlorinated plastics. Plastic bags used for the incineration of animals shall be nonchlorinated and no less than 3 mils thick. If containers are incinerated, documentation from the manufacturers certifying that they are composed of 0.5 percent or less by weight chlorinated plastics must be kept on-file at the site for the duration of their use and for at least five years after their use. This documentation must also be submitted with any application for renewal air operation permit.
[Rules 62-213.440 and 296.401(6)(e), F.A.C.]

E.12. This emissions unit is not permitted to cremate dead animals which were used for medical or commercial experimentation. No other material, including biomedical waste* as defined in Rule 62-210.200, F.A.C. (see below), shall be incinerated.

* "Biomedical Waste": Any solid waste or liquid waste which may present a threat of infection to humans, including nonliquid tissue, body parts, blood, blood products, and body fluids from humans and other primates; laboratory and veterinary wastes which contain human disease-causing agents; and, discarded sharps. The following are also included:

(a) Used absorbent materials saturated with blood, blood products, body fluids, or excretions or secretions contaminated with visible blood; and, absorbent materials saturated with blood or blood products that have dried.

(b) Non-absorbent, disposable devices that have been contaminated with blood, body fluids, or secretions or excretions visibly contaminated with blood, but have not been treated by a method listed in Section 381.0098, F.S., or a method approved pursuant to Rule 64E-16, F.A.C.

[Rules 62-296.401(6)(f) and 62-210.200, F.A.C.]

Training

E.13. Operators of the incinerator shall be trained by the equipment manufacturer's representatives or an equivalent state-approved organization. The content of the training program shall be submitted to the Department of Environmental Protection's Bureau of Air Regulation for approval. [Rule 62-296.401(6)(g), F.A.C.]

E.14. The content of the training program shall be submitted to the Department for approval through the permitting process and shall meet, at a minimum, the criteria applicable to cremation set forth in the EPA Medical Waste Incinerator Operator Training Program Course Handbook, EPA 453/B-93-018, and Instructor's Guide, EPA 453/B-93-019. [Rule 62-296.401(6)(g)1., F.A.C.]

E.15. A copy of the training certificate for each operator having satisfactorily completed the Department-approved training program must be submitted to the Department within 15 days of training. The owner of any new crematory units shall submit copies of the operator certificates within 15 days after completion of the initial compliance test pursuant to the unit's construction permit. [Rule 62-296.401(6)(g)2., F.A.C.]

E.16. An operator's certificate must be kept on file at the facility for the duration of the operator's employment and for an additional five years after termination of employment. [Rules 62-213.440 and 62-296.401(6)(g)3., F.A.C.]

Monitoring of Operations

E.17. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

E.18. The incinerator must be tested in its normal operating mode. In order for the permittee to be allowed to incinerate bedding, bags, or containers, these items shall be incinerated in normal amounts along with the animal remains during the compliance test burns. An incinerator which burns only animal remains during the compliance tests shall be permitted to incinerate only animal remains until a test determines compliance while incinerating bedding, bags, or containers along with the animal remains.

[Rule 62-4.070(3), F.A.C.]

E.19. Visible Emissions. The permittee shall have an initial and formal compliance test for visible emissions conducted during each federal fiscal year (October 1 - September 30).
[Rules 62-296.401(6)(j)1. and 62-297.310(7)(a)4.a., F.A.C.]

E.20. Visible Emissions. Compliance with the visible emissions limitation shall be determined by using DEP Method 9, incorporated in Chapter 62-297, F.A.C.
[Rules 62-296.401(6)(h)1. and 62-297.401(9)(c), F.A.C.]

E.21. Visible Emissions. The required minimum period of observation for an opacity compliance test shall be sixty (60) minutes. The opacity test observation period shall begin when incineration begins in the primary chamber.
[Rule 62-297.310(4)(a)2., F.A.C.]

E.22. Particulate Matter, Carbon Monoxide, and Oxygen. The permittee shall have an initial compliance test for particulate matter, carbon monoxide, and oxygen; after that, a compliance test shall be conducted prior to renewing the operation permit.
[Rules 62-296.401(6)(j)2. and 62-297.310(7)(a)3., F.A.C.]

E.23. Particulate Matter. Compliance with the particulate matter emission limitation shall be determined by using EPA Method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet.
[Rule 62-296.401(6)(h)4., F.A.C.]

E.24. Carbon Monoxide. Compliance with the carbon monoxide emission limitation shall be determined by using EPA Method 10, incorporated and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-296.401(6)(h)2., F.A.C.]

E.25. Oxygen. The oxygen concentration shall be determined by using EPA Method 3, incorporated and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-296.401(6)(h)3., F.A.C.]

E.26. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.401(6)(h)5., F.A.C.]

E.27. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may

accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

E.28. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(a), F.A.C.]

E.29. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

E.30. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

[Rule 62-297.310(4), F.A.C.]

E.31. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

E.32. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or,
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to 100 tons per year or more of any other regulated air pollutant

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

E.33. Compliance Demonstration. Compliance with the carbon monoxide and particulate emission standards may be demonstrated by submission of a test report for an identical (same make, model, and permitted capacity) crematory unit operating in compliance with a valid Department air permit and tested pursuant to that permit. The test data in the test report must be less than five years old and may or may not be obtained from the unit that is being permitted.
[Rule 62-296.401(6)(k), F.A.C.]

Continuous Emissions Monitoring Requirements

E.34. Continuous Emissions Monitoring Requirements. The permittee shall install, operate, and maintain on the animal crematory continuous monitors to record temperature at the point or beyond where 1.0 second gas retention time is obtained in the secondary combustion zone in accordance with the manufacturer's instructions. A complete file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; and adjustments, preventive maintenance, and corrective maintenance performed on these systems or devices, shall be recorded in a permanent legible form available for inspection. Combustion temperature monitoring documentation shall include operator name, operator indication of when cremation in the primary chamber begins, date, time, and temperature markings. The file shall be retained for at least five years following the recording of such measurements, reports, and records.
[Rules 62-213.440 and 62-296.401(6)(l), F.A.C.]

Reports and Recordkeeping.

E.35. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

E.36. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.

6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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

Section IV. This section is the Acid Rain Part.

Operated by: Walt Disney World Co.

ORIS code: 7294: Reedy Creek Combined Cycle

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions unit listed below is regulated under Acid Rain Part, Phase II.

<u>E.U./Facility ID No.</u>	<u>Description</u>
-088/CEP-1	Reedy Creek Combined Cycle

A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 08/05/02.
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2003	2004	2005	2006	2007
-088*	32432	SO ₂ allowances, under Table 2 of 40 CFR Part 73	18* rule**	18* rule**	18* rule**	18* rule**	18* rule**

* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 of 40 CFR 73.

** "Rule" denotes that the preceding allocation will be proposed in the upcoming Acid Rain Division rulemaking change. These allowances are unadjusted basis allowances only, unless noted.

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
3. Allowances shall be accounted for under the Federal Acid Rain Program.
[Rule 62-213.440(1)(c), F.A.C.]

A.4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 51., APPENDIX TV-4, TITLE V CONDITIONS}
[Rule 62-214.420(11), F.A.C.]

A.5. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62-214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, F.A.C.
[Rules 62-213.413 and 62-214.370(4), F.A.C.]

A.6. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400, F.A.C.
[Rule 62-213.440(1)(c)1., F.A.C.]

A.7. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.
[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, Definitions - Applicable Requirements, F.A.C.]

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Walt Disney World Co.
Walt Disney World Resort Complex

DRAFT Permit No.: 0950111-021-AV
Facility ID No.: 0950111

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

Brief Description of Emissions Units and/or Activities:

A. Commercial/Institutional External Combustion Boilers: Natural Gas Fired. These units are used to heat water.

1. Disney’s All-Star Resort (-113): ASR-2 thru ASR-108.
2. Disney’s Dixie Landings Resort (-xxx): DLR-1 thru DLR-25.
3. Disney’s Port Orleans Resort (-xxx): POR-1 thru POR-16.
4. Disney’s Polynesian Resort (-xxx): PR-1 thru PR-4, PR-6 thru PR-9, PR-11 & PR-12.
5. Disney’s Typhoon Lagoon (-xxx): TL-1 thru TL-3.
6. Disney’s Wilderness Lodge (-xxx): WLR-1 & WLR-2.
7. Disney’s Yacht and Beach Club (-xxx): YBC-1 & YBC-2.
8. Disney’s Grand Floridian Hotel (-035): GFR-2 thru GFR-18.
9. Disney-MGM Studio Tours (-053): STB-1, STB-2A, STB-3 thru STB-8.
10. Disney’s Blizzard Beach (-083): BB-1 thru BB-5.
11. Disney’s Boardwalk Resort (-091): BDW-3 thru BDW-10.
12. Disney’s Magic Kingdom (-092): MK-3.
13. Disney’s Animal Kingdom (-103): DAKU-1 thru DAKU-51.
14. Disney’s Coronado Springs Resort (-095): COS-1 thro COS-37.

B. Commercial/Institutional External Combustion Boilers: Natural/L.P. Gas Fired. These units are used to heat water.

1. Disney-MGM Studio Tours (-053): STB-2B1 & STB-2B2 (replaced HWG STB-2B).

C. Commercial/Institutional External Combustion Boiler: Primarily fired on Natural Gas or Propane (New No. 2 distillate fuel oil is used for back-up purposes). These units are used to heat water.

1. Reedy Creek Improvement District (-076): EPCOT HWG-1 thru -3.

D. Commercial/Institutional External Combustion Boiler: Primarily fired on Natural Gas (New No. 2 distillate fuel oil is used for back-up purposes). This unit is used to heat water.

1. Reedy Creek Improvement District (-081): CEP-2.

E. Commercial/Institutional External Combustion Boilers: Natural Gas Fired Only. This unit is used to make steam for the operation of the features of the “Tree of Life” and has a heat input rating of 1.075 MMBtu/hr.

1. Disney’s Animal Kingdom “Tree of Life” Boiler (-115): DAKU-52.

Appendix U-1 (cont.)

Walt Disney World Co.

Walt Disney World Resort Complex

Title V Air Operation Permit Renewal

DRAFT Permit No.: 0950111-021-AV

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F. Administration Area Laundry (-072): There are two natural gas fired thermal fluid heaters (LAU-1 & LAU-2). They are manufactured by Fulton Thermal Corporation and the Model No. is FT-C 1000. The combined heat input is 26 MMBtu/hr.

G. North Service Area Central Shops Building Annex (-005).

1. Sand Blast Chamber No. 1 (NSA-17). This emissions unit operation has a baghouse control system manufactured by Carter-Day, Model 14-RJ-84 to control particulate matter and visible emissions. The collection efficiency is estimated to be 99.7% for particulate matter @ 10 microns in size. The sand blast chamber utilization rate of sand is below 7 lbs/hr.

H. Paint Spray Booths. The following paint spray booth (PSB) operations are VOC emitters from the use of coatings, paints, thinners, and clean-up solvents. The permittee maintains accountability of VOC usage through a material balance scheme. All of the PSBs are equipped with paint arrestor type filters to control particulate matter and visible emissions. All hazardous wastes will be disposed pursuant to RCRA and Chapter 62-730, F.A.C. Also, NSA-7 has an associated natural gas fired curing oven.

E.U./Facility I.D.	Brief Description
<u>North Service Area Boat Maintenance and Painting Facility</u>	
-006/NSA-18	NSA Boat Maintenance PSB
<u>North Service Area Central Shops Building</u>	
-007/NSA-1	NSA PSB #1
-007/NSA-2	NSA PSB #2
-007/NSA-3	NSA PSB #3
-007/NSA-4	NSA Metalizing PSB
-007/NSA-5	NSA Staff Shop PSB #1
-007/NSA-6	NSA Staff Shop PSB #2
-007/NSA-7	NSA Water Wash Plastisol PSB #1; includes a natural gas fired curing oven
-007/NSA-11	NSA Character Head Spray Box
-007/NSA-12	NSA Artist's Preparation Shop PSB
-007/NSA-14	NSA Paint Shop PSB #6
-007/NSA-15	NSA Central Shop Paint Mixing Stations (7)
-007/NSA-16	NSA Urethane Adhesive Lay-up Workstations (4)
<u>North Service Area Lofting Building</u>	
-014/NSA-8	NSA Lofting Building PSB
<u>North Service Area Central Shops Building Annex</u>	
-015/NSA-9	NSA Paint Shop PSB #4
-015/NSA-10	NSA Paint Shop PSB #5
<u>Disney-MGM Studio</u>	
-061/MGM-10	Studio Craft PSB
<u>Buena Vista Construction</u>	
-062/BVC-1	PSB
<u>Lake Buena Vista Community Village</u>	
-063/LBV-1	PSB #1
-063/LBV-2	PSB #2
<u>Disney Village</u>	
-065/VM-3	Marketplace PSB
<u>Ft. Wilderness Golf Course</u>	
-066/FWR-4	PSB

Appendix U-1 (cont.)
Walt Disney World Co.
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E.U./Facility I.D.	Brief Description
<u>Disney's Yacht & Beach Club</u>	
-067/YBC-3	PSB
<u>EPCOT Center</u>	
-068/EP-1	Maintenance PSB
-068/EP-2	Display PSB
-070/EP-3	Marina PSB
<u>South Service Area</u>	
-071/SSA-1	Traffic Control Equipment PSB
<u>Disney's Magic Kingdom</u>	
-075/MK-1	PSB #1
-093/MK-2	PSB #2
<u>Disney's Boardwalk Resort</u>	
-094/BR-1	PSB #1
<u>Disney's Coronado Springs Resort</u>	
-102/COS-41	PSB #1
<u>Disney's All Star Resort</u>	
-114/ASR-1	PSB #1
<u>Disney-MGM Studios Feature Animation Building</u>	
-117/MGM-xx	PSB
-117/MGM-xx	PSB
<u>NSA Monorail Building</u>	
-118/NSA-20	Monorail Trains Spray Booth
<u>Disney's Animal Kingdom Paint Shop</u>	
-xxx/DAKU-53	Maintenance PSB

I. Stand-by/Emergency Generators (-101). The Walt Disney World Resort Complex operates 120 stand-by/emergency generators that fire new No. 2 distillate diesel fuel oil (108), natural gas (11), or LP gas (1). Of these generators within the complex, 85 are assigned to the Walt Disney World Co. operations and 35 are assigned to the Reedy Creek Improvement District operations. See Attachment WDWRC for the break-down of these generators.

J. Facility-wide Fugitive VOC emissions. There are several large architectural type structures that cannot be coated/painted within an enclosed building, but have to be coated/painted after the structure has been made. Therefore, this subsection covers such type activities. Just as the paint spray booth operations, the permittee maintains accountability of VOC usage through a material balance scheme. All hazardous wastes will be disposed pursuant to RCRA and Chapter 62-730, F.A.C.

K. Miscellaneous

1. Degasifiers
2. Equipment used exclusively for space heating
3. Fireplaces
4. Natural gas gate and compression station, including odorant addition equipment
5. Oil and organic solvent storage tanks >550 gallons
6. Parts cleaning and degreasing stations
7. Pool heaters <1 MMBtu/hr maximum gross heat output, each
8. Portable kerosene space heaters
9. Sewage treatment facilities

Appendix U-1 (cont.)

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10. Silk screening
11. Smokehouse
12. Storage tanks <550 gallons
13. Water heaters used for comfort heating, <1 MMBtu/hr maximum gross heat output, each
14. Twenty-six natural gas-fired laundry dryers @ 32.6 MMBtu/hr total heat input.

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Walt Disney World Co.
Walt Disney World Resort Complex

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The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

1. Applications of fungicides, herbicides and pesticides.
2. Battery charging.
3. Blueprint reproduction.
4. Brazing, soldering and welding.
5. Campfires.
6. Compressed air systems, including air compressors and driers.
7. Degasifiers.
8. Electric drying oven with no air pollutant emissions expected.
9. Equipment used exclusively for space heating.
10. Equipment used exclusively to sand and shape wood or plastic.
11. Fireplaces.
12. Fresh water cooling towers.
13. Generator venting.
14. HVAC and chiller units that are in compliance with Rule 62-213.300(3)(o), F.A.C.
15. Inorganic substance storage tanks >550 gallons.
16. Kitchen exhaust.
17. Laboratory hood vents.
18. Latex injection.
19. Laundry dryers.
20. Lube oil tank vents.
21. Lube oil vents associated with rotating equipment.
22. Maintenance activity associated with transformers, switches, switchgear processing (including cleaning, changing and venting).
23. Natural gas gate and compression station, including odorant addition equipment.
24. Natural gas system maintenance.
25. Office equipment and office ventilation.
26. Oil and organic solvent storage tanks >550 gallons

Appendix I-1 (cont.)
Walt Disney World Co.
Walt Disney World Resort Complex
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27. Oil truck unloading equipment.
28. Oil/water separators.
29. Parts cleaning and degreasing stations, except for those subject to Rule 62-213.300(1)(c), F.A.C.
30. Pool heaters with less than 1 MMBtu/hr maximum gross heat output each.
31. Portable kerosene space heaters.
32. Recycling operations, including sorting, compacting and baling.
33. Refrigeration systems that are in compliance with Rule 62-213.300(3)(o), F.A.C.
34. Routine maintenance and repair activities, except painting
35. Sewage treatment facilities.
36. Sewer line vents.
37. Silk screening.
38. Smokehouse.
39. Special effects.
40. Stack test sampling equipment.
41. Tiki torches.
42. Turbine vapor extractor.
43. Black-start Generator.
 1. This generator has historically fired a total amount of less than 10,000 gallons per year.
44. Water heaters used for comfort heating with less than 1 MMBtu/hr maximum gross heat output each:
 - a. Disney's Animal Kingdom. Fifty-three (53) natural gas fired radiant comfort heaters with a gross maximum heat output of less than one million Btu per hour per unit pursuant to Rule 62-210.300(3)(a)4., F.A.C. (DAKE-1 thru DAKE-53)
 - b. Etc.

Appendix H-1: Permit History

Walt Disney World Co.
Walt Disney World Resort Complex

DRAFT Permit No.: 0950111-021-AV
Facility ID No.: 0950111

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type
All	Facility	0950111-005-AV	01/01/1998	12/31/2002	Initial
-088/CEP-1	CCCT and HRSG	0950111-016-AC	05/25/1999	12/31/2002	Construction (mod.)
		0950111-017-AV	05/25/1999	12/31/2002	Revision
-112/DAK-1	Necropsy Bldg.: Animal Crematory	0950111-013-AC	03/18/1998	12/31/1999	Construction (new)
		0950111-017-AV	05/25/1999	12/31/2002	Revision
-115/DAKU-52	Tree of Life Boiler	0950111-016-AC	05/25/1999	12/31/2002	Construction (new)
		0950111-017-AV	05/25/1999	12/31/2002	Revision
All	Facility	0950111-021-AV	Pending	Pending	Renewal

APPENDIX CAM

Compliance Assurance Monitoring Requirements

Compliance Assurance Monitoring Requirements

Pursuant to Rule 62-213.440(1)(b)1.a., F.A.C., the CAM plans that are included in this appendix contain the monitoring requirements necessary to satisfy 40 CFR 64. Conditions 1. – 17. are generic conditions applicable to all emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the attached tables, as submitted by the applicant and approved by the Department.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan(s), as submitted by the applicant, is/are approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]
2. The attached CAM plan(s) include the following information:
 - (i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
 - (ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
 - (iii) The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.[40 CFR 64.6(c)(1)]
3. The attached CAM plan(s) describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 9.**) and reporting exceedances or excursions (see **CAM Conditions 10. - 14.**).
[40 CFR 64.6(c)(2)]
4. The permittee is required to conduct the monitoring specified in the attached CAM plan(s) and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5. - 17.**).
[40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of operation. The owner or operator shall conduct the monitoring required under this appendix upon the effective date of this Title V permit.
[40 CFR 64.7(a)]
6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR 64.7(b)]
7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

8. Response to excursions or exceedances.

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions, if allowed by this permit). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of need for improved monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Based on the results of a determination made under **CAM Condition 8.a.**, above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

[40 CFR 64.8(a)]

11. Elements of a QIP:

a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

- (i) Improved preventive maintenance practices.
- (ii) Process operation changes.
- (iii) Appropriate improvements to control methods.
- (iv) Other steps appropriate to correct control performance.
- (v) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(i)** through **(iv)**, above).

[40 CFR 64.8(b)]

12. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

[40 CFR 64.8(c)]

13. Following implementation of a QIP, upon any subsequent determination pursuant to **CAM Condition 8.b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

- a. Failed to address the cause of the control device performance problems; or
- b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[40 CFR 64.8(d)]

14. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[40 CFR 64.8(e)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General reporting requirements.

- a. On and after the date specified in **CAM Condition 5.** by which the owner or operator must use monitoring that meets the requirements of this appendix, the owner or operator shall submit monitoring reports semi-annually to the permitting authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C.
- b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-213.440(1)(b)3.a., F.A.C., and the following information, as applicable:
 - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - (iii) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10.** through **14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR 64.9(a)]

16. General recordkeeping requirements.

- a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62-213.440(1)(b)2., F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10.** through **14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use

of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

40 CFR 64.10 Savings Provisions.

17. It should be noted that nothing in this appendix shall:

- a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.
- b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.
- c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[40 CFR 64.10]

Emissions Unit 088

**Combined Cycle Combustion Turbine with a Natural Gas-
Fired Duct Burner-Heat Recovery Steam Generator**

Monitoring Approach and Corrective Action Procedures

MONITORING APPROACH SUBMITTAL

I. Background

A. Emissions Unit

Description: Combined Cycle Combustion Turbine
(Type of emissions point) with a Natural Gas-Fired Duct Burner-
Heat Recovery Steam Generator

Identification: 088
(Emissions point number)

Facility: Walt Disney World Resort Complex –
(Location) Facility ID 0950111

B. Applicable Regulation, Emission Limits, and Monitoring Requirements

Regulation No.: 40 CFR 60 Subpart GG

Pollutant: Carbon Monoxide 25 lbs/hr or 110 tpy burning natural gas
(Emissions limit)

Pollutant: Carbon Monoxide 24 lbs/hr or 4 tpy burning fuel oil
(Emissions limit)

C. Control Technology

Carbon Monoxide (CO) is controlled or reduced by the use of a catalytic oxidation system, which is effectively a passive control system. The catalyst (stainless steel foil coated with calcined alumina with platinum metal) enhances the chemical reaction between oxygen and carbon monoxide and forms carbon dioxide as the end product. This reaction is greater than 80% efficient at 392° F (200° C) within minutes of gas turbine startup, before power generation begins. The catalyst normally operates at a temperature around 800° F (427° C) with corresponding CO removal efficiencies above 90%. The carbon monoxide removal efficiency increases as temperature increases up to the maximum operating limit of 1250° F (677° C). (Refer to the attached graph in Figure 1, which illustrates the carbon monoxide conversion efficiency at varying temperatures up to 500° C (932° F). This system is designed and certified by the manufacturer to operate while the plant is burning either natural gas or new No. 2 diesel fuel oil.

A plant operator occupies the plant control room 24 hours per day, which allows the plant personnel to monitor two key catalyst operating parameters. Namely, catalyst inlet temperature and pressure drop across the catalyst bed. A high temperature alarm is in place to alert the operator if the catalyst inlet temperature exceeds 1250° F (677° C) to protect the bed from thermal damage; and a high-pressure alarm sounds if the pressure drop across the catalyst bed exceeds 3" of water column. The pressure reading serves two purposes: to ensure that there is airflow across the bed, thus verifying that the system is operating, and to alert the plant operator if a possible plugging or fouling has occurred.

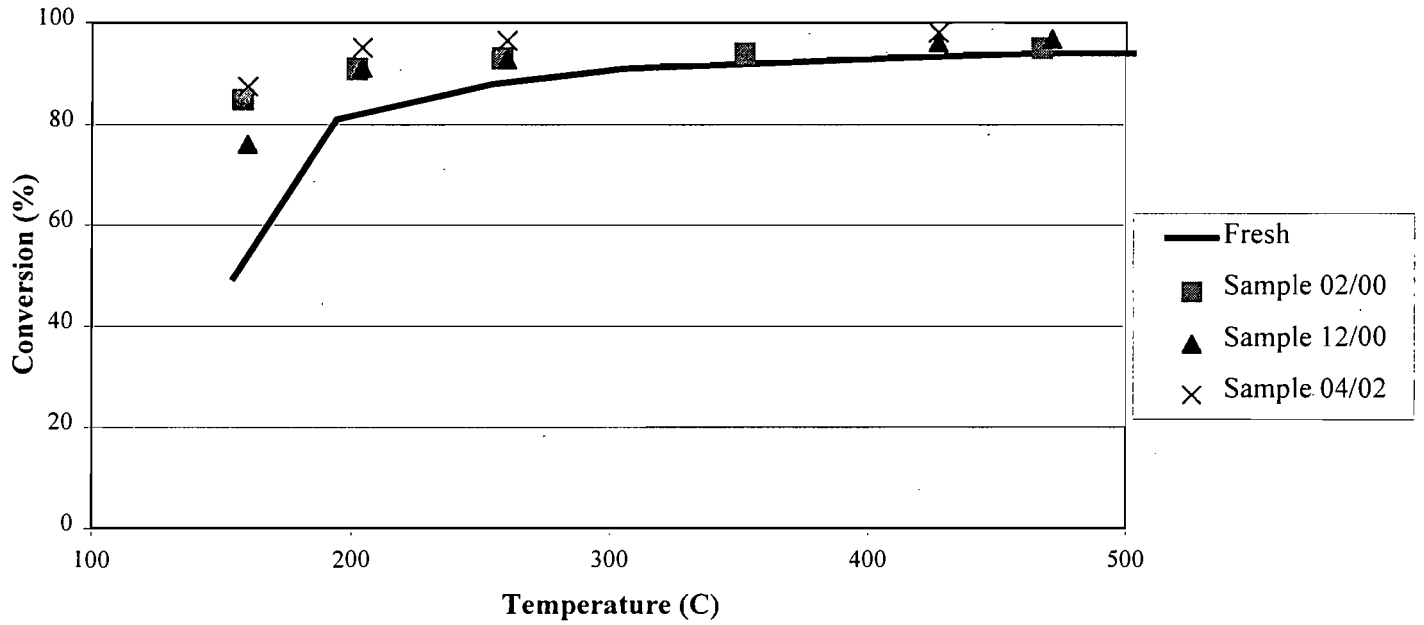
II. Monitoring Approach

The key elements of the monitoring approach are presented in Table 1. The selected performance indicators are catalyst inlet temperature, pressure drop across the catalyst bed, and annual analysis of a catalyst test plug. The plant operator manually logs the temperature and the pressure drop once a day, monitors the alarms, and takes action if the readings are outside the allowable operating range. The test plug is analyzed annually to enable the catalyst manufacturer to certify the condition of the catalyst.

TABLE 1: MONITORING APPROACH

	Indicator No. 1	Indicator No. 2
I. Indicator	Catalyst inlet temperature and pressure differential	Annual Test plug analysis
Measurement Approach	Thermocouples Pressure sensors	A test plug of the catalytic material is removed for the manufacturer's laboratory analysis.
II. Indicator Range	Minimum Temp. : 392° F (200° C) Maximum Temp. : 1250° F (677° C) Maximum pressure diff. = 3" of water column (w.c.)	Manufacturer certifies whether or not the catalyst is within operating specifications.
QIP Threshold (optional)	An excursion is defined as falling below 392° F (200° C), or rising above 1250° F (677° C), or rising above 3" w.c., during normal operation.	
III. Performance Criteria		
A. Data Representativeness	The thermocouples are located at the inlet face of the catalyst bed. The pressure sensors are located on the inlet and outlet faces of the catalyst bed.	A representative sample is removed from the catalyst bed in accordance with manufacturer's operational instructions.
B. Verification of Operational Status	Plant control room operators monitor the alarm system 24 hours/day and records data once per day.	Manufacturer certified condition of catalyst after initial installation and annually thereafter.
C. QA/QC Practices and Criteria	Annual testing/calibration of the temperature and pressure sensor transmitters	NA
D. Monitoring Frequency	Daily	Annual
Data Collection Procedures	Temperature and pressure readings are recorded daily.	Test plugs are removed when the plant is shut down for annual maintenance.
Averaging Procedures	NA (monitoring data does not correspond to actual emissions rate.)	NA

Figure 1: Reedy Creek Cogeneration Plant CO Conversion



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BUREAU OF AIR REGULATION

Phase II Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission: New Revised *Renewal*

STEP 1

Identify the source by plant name, State, and ORIS code from NADB

Plant Name REEDY CRREK	State FL	ORIS Code 7254
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STEP 2 Enter the unit ID# for each affected unit and indicate whether a unit is being repowered and the repowering plan being renewed by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e.

	Compliance Plan				
a	b	c	d	e	
Unit ID#	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline	
CT/HRSG 1	Yes	No	N/A	N/A	
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				
	Yes				

STEP 3

Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that is being repowered, the Repowering Extension Plan form is included.

STEP 4

Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Plant Name (from Step 1)

REEDY CREEK

Standard RequirementsAcid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the Department; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain part application, the Acid Rain part, or an exemption under 40 CFR 72.7, 72.8, or 72.14 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the Department:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Plant Name (from Step 1)
 REEDY CREEK

Recordkeeping and Reporting Requirements (cont)

- (iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

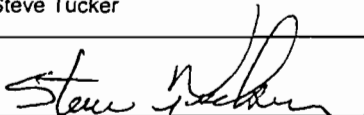
- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7, 72.8 or 72.14, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7, 72.8, or 72.14 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Steve Tucker	
Signature		Date 8/5/02

**Attachment WDWR
Walt Disney World Resort Complex Stand-By/Emergency Generator Inventory**

Number	Entity	Location	Description	Manufacturer	Model	Power Rating, HP	Power Rating, KW	Fuel Type	Fuel Usage Rate, gph	Nat. Gas Usage Rate, ft3h	LPG Usage Rate, ft3h
1	WDW	All-Star	Sports E.G.	Caterpillar	3208	299	N/A	D	14.8	N/A	N/A
2	WDW	All-Star	Music E.G.	Caterpillar	3208	263	N/A	D	13.8	N/A	N/A
3	WDW	All-Star	Movies E.G.	Onan	DGFC	317	200	D	14.2	N/A	N/A
4	WDW	Blizzard Beach	E.G.	Caterpillar	94A04751S	263	N/A	D	13.5	N/A	N/A
5	WDW	Boardwalk	E.G. 1	Caterpillar	3412	749	N/A	D	40.3	N/A	N/A
6	WDW	Boardwalk	E.G. 2	Caterpillar	3306B	377	N/A	D	19.5	N/A	N/A
7	WDW	Boardwalk	E.G. 3	Caterpillar	CD060	96	N/A	D	5.3	N/A	N/A
8	WDW	Bonnet Creek	E.G. EMG-001-BC	Generac	91A03181-S	N/A	20	NG	N/A	329	N/A
9	WDW	Car Care Center	E.G.	Caterpillar	3208	195	N/A	D	12.8	N/A	N/A
10	WDW	Caribbean Beach	E.G.	Cummins/ Kohler	4B-3.9	66	N/A	D	4	N/A	N/A
11	WDW	Casting Building	E.G.	Cummins/ Kohler	50R0ZJ	100	N/A	D	7	N/A	N/A
12	WDW	Contemporary	E.G. 2	Cummins	200 0DFP- 4XR/98490	355	N/A	D	40	N/A	N/A
13	WDW	Contemporary	E.G. 1	Detroit Diesel	8V92TA	643	N/A	D	33	N/A	N/A
14	WDW	Contemporary	E.G. 3	Kohler	150R0ZJ71	186	N/A	D	10	N/A	N/A
15	WDW	Coronado Springs	Conv. Center E.G.	Kohler	500ROZD	830	N/A	D	45	N/A	N/A
16	WDW	Coronado Springs	Lift Station E.G.	Kohler	80ROZJ	150	N/A	D	9	N/A	N/A
17	WDW	Coronado Springs	Villa #4 Fire Pump			93	N/A	D	5.4	N/A	N/A
18	WDW	Corporate Tooling Warehouse	Fire Pump EMG-002-WH	Caterpillar	3306B	231	N/A	D	13.8	N/A	N/A
19	WDW	Corporate Tooling Warehouse	Fire Pump EMG-001-WH	Caterpillar	3306B	141	N/A	D	10.5	N/A	N/A
20	WDW	DC-6	E.G. EMG-001-VA	Caterpillar	3208	224	N/A	D	13.1	N/A	N/A
21	WDW	Disney Institute	Bldg A E.G.	Cummins/Onan	250 DFAC	380	N/A	D	20	N/A	N/A
22	WDW	Disney Institute	Bldg F E.G.	McGraw Edison	15 OJC- 4P/26331AB	31	N/A	NG	2	N/A	N/A
23	WDW	Disney Village Resort	E.G. EMG-14A-ER	Cummins	4B-3.9	66	N/A	D	4	N/A	N/A
24	WDW	Disney Village Resort	E.G. EMG-052-EE	Onan	15.OJC- 4P/26331AB	31	N/A	NG	2	N/A	N/A
25	WDW	Empress Lilly	E.G. EMG-001-K	Onan	15.OJC-18R/7AA	31	N/A	D	2	N/A	N/A

**Attachment WDWRC
Walt Disney World Resort Complex Stand-By/Emergency Generator Inventory**

Number	Entity	Location	Description	Manufacturer	Model	Power Rating, HP	Power Rating, KW	Fuel Type	Fuel Usage Rate, gph	Nat. Gas Usage Rate, ft3h	LPG Usage Rate, ft3h
26	WDW	Epcot	Land E.G. 1	Caterpillar	3208	195	N/A	D	12.8	N/A	N/A
27	WDW	Epcot	Land E.G. 2	Caterpillar	3208	155	N/A	D	12.4	N/A	N/A
28	WDW	Epcot	France E.G.	Cummins	NT-855-64	216	N/A	D	10	N/A	N/A
29	WDW	Epcot	Gateway E.G.	Onan	6BT	135	N/A	D	8	N/A	N/A
30	RC	Fire Station LBV	E.G.	John Deere	6076TF010	211	125	D	9.5	N/A	N/A
31	WDW	Grand Floridian	E.G.	Cummins	KTTA38-GS-1	N/A	900	D	75		
32	RC	Lift Sta #28	E.G.	Allis-Chalmers	6138 LT	685	N/A	D	32	N/A	N/A
33	RC	Lift Sta #28	E.G.	Caterpillar	3406B	416	275	D	21.1	N/A	N/A
34	RC	Lift Sta. #1	E.G.	Caterpillar	D 346	550	375	D	29	N/A	N/A
35	RC	Lift Sta. #1	Emerg. Pump	Ford	SSD-681	129	N/A	D	7.5	N/A	N/A
36	RC	Lift Sta. #28	Emerg. Pump	Detroit Diesel	10437100	143	N/A	D	8.6	N/A	N/A
37	RC	Lift Sta. #29	Emerg. Pump	Murphy Diesel	D302-2	20	N/A	D	1.2	N/A	N/A
38	RC	Lift Sta. #30	Emerg. Pump	Murphy Diesel	D302-2	20	N/A	D	1.2	N/A	N/A
39	RC	Lift Sta. #35	Emerg. Pump	Ford	BSD-444-6007-ZZ	72	N/A	D	4.2	N/A	N/A
40	RC	Lift Sta. #36	E.G.	Caterpillar	3208	269	200	D	13.8	N/A	N/A
41	RC	Lift Sta. #41	E.G.	Onan	L4223D 17103900	N/A	20	D	3	N/A	N/A
42	RC	Lift Sta. #47	E.G.	Caterpillar	3114	119	56	D	6.2	N/A	N/A
43	RC	Lift Sta. #5	Emerg. Pump	Ford	SSD-681	129	N/A	D	7.5	N/A	N/A
44	RC	Lift Sta. #55	E.G.	Cummins	KTA 19G3	685	N/A	D	32	N/A	N/A
45	RC	Lift Sta. #56	E.G.	John Deere	6059TF001	166	100	D	7.7	N/A	N/A
46	RC	Lift Sta. #6	Emerg. Pump	Ford	SSD-437	63	N/A	D	3.8	N/A	N/A
47	RC	Lift Sta. #60	E.G.	Caterpillar	3406	449	300	D	23	N/A	N/A
48	RC	Lift Sta. #7	E.G.	Caterpillar	3412	355	500	D	40.3	N/A	N/A
49	RC	Lift Sta. #8	Emerg. Pump	Detroit Diesel	10337100	103	N/A	D	6.5	N/A	N/A
50	WDW	Magic Kingdom	E.G.	Allis-Chalmers	N/A	N/A	125	D	10	N/A	N/A
51	WDW	Magic Kingdom	E.G.	Ringhaver	N/A	N/A	370	D	30	N/A	N/A
52	RC	Magic Kingdom	E.G.	Kohler	20RH82	N/A	20	NG	3	N/A	N/A
53	WDW	Magic Kingdom	E.G.- Tunnel Entrance	N/A	N/A	N/A	N/A	N/A	5	N/A	N/A
54	WDW	Magic Kingdom	E.G.- Skyway	N/A	N/A	N/A	N/A	N/A	5	N/A	N/A
55	RC	Mobile Portable	E.G. 1	Detroit Diesel	10437316	226	150	D	12.1	N/A	N/A
56	RC	Mobile Portable	Emerg. Pump	Ford	BSD-4441-6005-E	72	N/A	D	4.2	N/A	N/A
57	RC	Mobile Portable	E.G.	Perkins	LJ 33478	86	50	D	3.7	N/A	N/A
58	WDW	Pleasure Island	E.G. EMG-000-I	Cummins	200D4L	33	N/A	D	2	N/A	N/A

**Attachment WDWRRC
Walt Disney World Resort Complex Stand-By/Emergency Generator Inventory**

Number	Entity	Location	Description	Manufacturer	Model	Power Rating, HP	Power Rating, KW	Fuel Type	Fuel Usage Rate, gph	Nat. Gas Usage Rate, ft3h	LPG Usage Rate, ft3h
59	WDW	Polynesian	Tangaroa Terrace E.G. Bldg 11 (Pago Pago)	Onan	12.5 RJC	17	13	NG	1	N/A	N/A
60	WDW	Polynesian		Onan		25	15	NG	2	N/A	N/A
61	WDW	Port/Dixie	E.G. 1	Caterpillar	3406	449	N/A	D	22.7	N/A	N/A
62	WDW	Port/Dixie	E.G. 2	Kohler	60RZ272	126	N/A	NG	N/A	N/A	N/A
63	WDW	Port/Dixie	E.G. 3	Kohler	60RZ282	165	N/A	NG	13	N/A	N/A
64	WDW	Port/Dixie	E.G. 4	Caterpillar	M/SR4	445	N/A	NG	23	3714	N/A
65	RC	Pump Sta. B	E.G.	Caterpillar	3412 DI	749	500	D	40.3	N/A	N/A
66	RC	Pump Sta. C	E.G.	Cummins	VTA-1710-G	800	500	D	48	N/A	N/A
67	RC	RCID Lab-SSA	E.G.	Kohler	30RZ281	66	33	D	4.8	N/A	N/A
68	WDW	Sports Complex	E.G.-SC1	Kohler	300R0ZD		300	D	25	N/A	N/A
69	WDW	Sports Complex	E.G.-SC2	Onan	50DGCA	86	50	D	4	N/A	N/A
70	WDW	Studio	E.G. G-7	Caterpillar	3406	519	N/A	D	26.6	N/A	N/A
71	WDW	Studio	E.G. G-8	Caterpillar	3406	449	N/A	D	22.7	N/A	N/A
72	WDW	Studio	E.G. G-4	Caterpillar	3406	416	N/A	D	19.8	N/A	N/A
73	WDW	Studio	E.G. G-2	Caterpillar	3306	306	N/A	D	14.9	N/A	N/A
74	WDW	Studio	E.G. G-1-A	Caterpillar	3306B	306	N/A	D	14.9	N/A	N/A
75	WDW	Studio	E.G. G-3	Caterpillar	3306B	306	N/A	D	14.9	N/A	N/A
76	WDW	Studio	E.G. G-1	Caterpillar	3208	230	N/A	D	13.2	N/A	N/A
77	WDW	Studio	E.G. G-5	Caterpillar	3208	230	N/A	D	13.2	N/A	N/A
78	WDW	Studio	E.G. G-6	Caterpillar	3208	230	N/A	D	13.2	N/A	N/A
79	WDW	Sun Bank	E.G. EMG-001-K0	Allis-Chalmers	11000-MK11		125	D	10	N/A	N/A
80	WDW	Team Disney	E.G. EMG-001-AB	Cummins	KTA38651	950	N/A	D	48	N/A	N/A
81	WDW	Team Disney	E.G. EMG-002-AB	Cummins	KTA38651	950	N/A	D	48	N/A	N/A
82	WDW	Team Disney	Fire Pump EMG-003-AB	Cummins	6BTA-5.9	244	N/A	D	16	N/A	N/A
83	WDW	TTC	E.G.	Onan	3010DDA-15R		20	D	3	N/A	N/A
84	WDW	Typhoon Lagoon	E.G. #4 (near filters)	Caterpillar	3406B	449	N/A	D	22.7	N/A	N/A
85	WDW	Typhoon Lagoon	E.G. #5 (near maint.)	Caterpillar	3406B	449	N/A	D	22.7	N/A	N/A
86	WDW	Typhoon Lagoon	E.G. #3 (Leaning Palms)	Cummins	6BT-5.9	166	N/A	D	8	N/A	N/A
87	WDW	Typhoon Lagoon	E.G. #1(Singapore Sal's)	Cummins	6BT-5.9	135	N/A	D	8	N/A	N/A

**Attachment WDWRRC
Walt Disney World Resort Complex Stand-By/Emergency Generator Inventory**

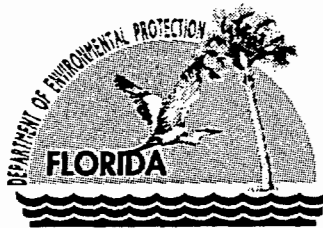
Number	Entity	Location	Description	Manufacturer	Model	Power Rating, HP	Power Rating, KW	Fuel Type	Fuel Usage Rate, gph	Nat. Gas Usage Rate, ft3h	LPG Usage Rate, ft3h
88	WDW	Typhoon Lagoon	E.G. #2 (Typhoon Tilly's)	Cummins	4B-3.9	66	N/A	D	4	N/A	N/A
89	WDW	Vacation Club	E.G. EMG-002-DV	Kohler	10RZ82N	17	N/A	NG	1	N/A	N/A
90	WDW	Vacation Club	E.G. EMG-001-DV	Ford	CSG-6491-6005	49	N/A	NG	3	N/A	N/A
91	WDW	Walk-In Clinic	E.G. EMG-001-KR	White	2383	N/A	35	D	4	N/A	N/A
92	RC	Well #16	E.G.	Caterpillar	3406B	587	460	D	29	N/A	N/A
93	RC	Well #17	E.G.	Caterpillar	3406B	587	400	D	29	N/A	N/A
94	RC	Well #2	E.G.	Cummins	KTA-1150-G	685	350	D	32	N/A	N/A
95	RC	Well #5	Emerg. Fire Pump	Caterpillar	3208	150	N/A	D	8.5	N/A	N/A
96	RC	Wells 9 & 10	E.G.	Caterpillar	3208	299	200	D	14.8	N/A	N/A
97	WDW	Wilderness Lodge	E.G.	Caterpillar	3508	###	N/A	D	60.5	N/A	N/A
98	RC	WWTP #1	E.G. 1	Detroit Diesel	71237406	750	500	D	38.2	N/A	N/A
99	RC	WWTP #2	E.G. 1	Detroit Diesel	81237416	947	600	D	48	N/A	N/A
100	RC	WWTP #3	E.G. 1	Detroit Diesel	08VF 154871	643	400	D	33.4	N/A	N/A
101	RC	WWTP #4	E.G. 1	Detroit Diesel	10437316	226	150	D	12.1	N/A	N/A
102	WDW	Yacht & Beach	Chiller Room E.G.	Caterpillar	5N-8670-SR 4	890	N/A	D	44.9	N/A	N/A
103	WDW	Yacht & Beach	Convention Center E.G.	Caterpillar	3116D1	192	N/A	D	9.8	N/A	N/A
104	WDW	Yacht & Beach	Pool Gazebo E.G.	Winco	520000-410	120	N/A	LPG	N/A	N/A	N/A
105	WDW	Animal Kingdom	Conservation Station	Kohler	N/A	423	N/A	D	11.1	N/A	N/A
106	WDW	Animal Kingdom	Countdown to Extinction	Kohler	N/A	423	N/A	D	11.1	N/A	N/A
107	WDW	Animal Kingdom	Parking Lot	Kohler	N/A	330	N/A	D	19.2	N/A	N/A
108	WDW	Animal Kingdom	Safari Village restrooms	Kohler	N/A	330	N/A	D	11.1	N/A	N/A
109	WDW	Animal Kingdom	Village First Aid	Kohler	N/A	330	N/A	D	11.1	N/A	N/A
110	WDW	Animal Kingdom	BOH Cast Bldg	Kohler	N/A	300	N/A	D	11.1	N/A	N/A
111	WDW	Animal Kingdom	Asia restrooms	Kohler	N/A	250	N/A	D	16.1	N/A	N/A
112	WDW	Animal Kingdom	Building Block #1	Kohler	N/A	250	N/A	D	16.1	N/A	N/A
113	WDW	Animal Kingdom	Chester & Hester	Kohler	N/A	250	N/A	D	11.1	N/A	N/A
114	WDW	Animal Kingdom	Guitar Pond	Kohler	N/A	250	N/A	D	16.1	N/A	N/A
115	WDW	Animal Kingdom	Tusker House	Kohler	N/A	250	N/A	D	19.2	N/A	N/A

**Attachment WDWRC
Walt Disney World Resort Complex Stand-By/Emergency Generator Inventory**

Number	Entity	Location	Description	Manufacturer	Model	Power Rating, HP	Power Rating, KW	Fuel Type	Fuel Usage Rate, gph	Nat. Gas Usage Rate, ft3h	LPG Usage Rate, ft3h
116	WDW	Animal Kingdom	Restaurantsaurus	Kohler	N/A	250	N/A	D	11.1	N/A	N/A
117	WDW	Animal Kingdom	Theater in the Wild	Kohler	N/A	250	N/A	D	7.4	N/A	N/A
118	WDW	Animal Kingdom	BOH Maint. Bldg	Kohler	N/A	166	N/A	D	8	N/A	N/A
119	WDW	Animal Kingdom	BOH Wardrobe Bldg	Kohler	N/A	N/A	N/A	D	13.7	N/A	N/A
120	WDW	Admin Area- Alarms	DC6 E.G.	N/A	N/A	N/A	N/A	N/A	10	N/A	N/A
									1903	4043	0

red text indicates estimated fuel usage

Total hourly fuel usage: 1903 gal/hr
 Average hours per year: 12 hours
 Total fuel usage per year: 22835 gal/yr



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Certified Mail – Return Receipt Requested

August 6, 2002

Mr. Lee Schmudde, P.E., D.P.A.
V.P. and Responsible Official
Walt Disney World Co.
P. O. Box 10,000
Lake Buena Vista, FL 32830-1000

Re: Title V Air Operation Permit Renewal Application
Reedy Creek Combined Cycle
Facility ID: **0950111**; ORIS Code: **7294**

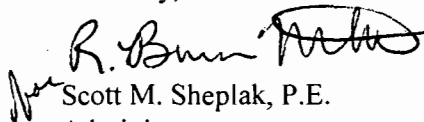
Dear Mr. Schmudde:

Thank you for your recent submission of a Title V Air Operation Permit Renewal Application for the referenced plant. However, we must deem your application *incomplete*, for the following reasons:

1. An updated Phase II Acid Rain Part Application was omitted. Please be advised that Department Rule 62-214.320(1)(i) requires that, "the designated representative of any Title V source having a Title V permit with an Acid Rain Part shall submit a complete application for renewal of the Title V permit with the Acid Rain Part for each Acid Rain unit at the source." Since the application is lacking, please write in "Renewal" for the action sought. (Also, please check if there are any changes to the Designated Representative for the facility, and submit an updated Certificate of Representation if necessary.)
2. Please try to establish the CAM Plan in a tabular form, so that we can refer to it in the Title V Permit as an attachment.

When we receive this information we will continue processing your application. If you have any questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,


Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Rich Bumar, P.E., WDWC (use regular mail)
Len Kozlov, DEP - CD

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 City, State, ZIP+4
 Lake Buena Vista, Florida 32830-1000