

Z 333 638 230

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Mr. Lee Schmutde	
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PS Form 3800, April 1995

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- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Lee Schmutde  
 Vice President, Legal  
 Walt Disney World Co.  
 P.O. Box 10,000  
 Lake Buena Vista, Florida  
 32830-1000

4a. Article Number

Z 333 638 230

4b. Service Type

- Registered
- Certified
- Express Mail
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- Return Receipt for Merchandise
- GCD

7. Date of Delivery

SEP 5 2000

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

FULFILLMENT & MAIL SERVICES

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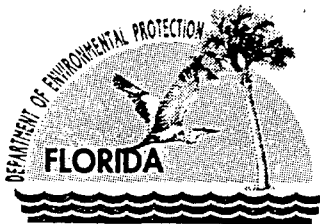
6. Signature: (Addressee or Agent)

X

Thank you for using Return Receipt Service.



*Fike Coy*



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

August 29, 2000

CERTIFIED MAIL – Return Receipt Requested

Mr. Lee Schmutde  
Vice President, Legal  
Walt Disney World Co.  
P.O. Box 10,000  
Lake Buena Vista, Florida 32830-1000

Re: Walt Disney World Resort  
Conditional Exemption for One Paint Spray Booth  
North Service Area Central Shops Building: Show Props and Vehicles Spray Booth (NSA-19)

Dear Mr. Schmutde:

The Department has evaluated the submittal regarding the above referenced proposed new emission activity, in which one paint spray booth (NSA-19) will be co-located with other existing support and maintenance activities located within the North Service Area Central Shops Building (NSACSB) that emit volatile organic compounds (VOC) emissions.

The NSA-19 operations will be used to spray coating materials onto show props and vehicles, including transportation vehicles such as buses and boats, and as needed for touch-up requirements; also, the operations will be intermittent or batch type (potential/estimated gallons per year usage of paints and solvents are 2335). The increase of potential VOC emissions from the new booth is 6.7 tons per year (TPY):

The existing facility is a "major source of air pollution" or "Title V Source" for criteria pollutants and hazardous air pollutant emissions pursuant to Rule 62-210.200, Florida Administrative Code (F.A.C.), Definitions, and received its initial Title V operation permit on December 31, 1997, and became effective on January 1, 1998. Since the proposed contemporaneous VOC emissions increase is much less than the significant emissions rate of 40 TPY contained in Table 212.400-2, F.A.C., the proposal is not subject to PSD new source review pursuant to Rule 62-212.400(5), F.A.C.; also, for PSD review consideration pursuant to Rule 62-212.400(6)(b), F.A.C., it is determined that the proposal is not considered as part of a phased project. Finally, there are no specific emission limiting standards pursuant to Rule 62-204.800 and Chapter 62-296, F.A.C.

Based on the above findings, the Department is granting a conditional exemption from the air permitting requirements of the Florida Department of Environmental Protection for the subject paint spray booth. The exemption is based on the premise that any air pollutants emitted from the proposed paint spray booth will not be in significant quantities to contribute to air pollution problems in the state pursuant to Rule 62-4.040(1)(b), F.A.C.

The conditions of this exemption are:

- A. North Service Area Central Shops Building: Show Props and Vehicles Spray Booth (NSA-19)
  - 1. The total material usage of the paint spray booth operations is 2335 gallons per calendar year.
  - 2. The owner or operator(s) will account for the materials used using a materials balance scheme, which employs the following:
    - a. a beginning inventory of materials in stock (on or about 1/1/yr);
    - b. adding any materials received during the year;
    - c. subtracting any materials recycled during the year; and,
    - d. subtracting any ending inventory of materials in stock (on or about 12/31/yr), with the net result assumed to have been used and emitted.

"More Protection, Less Process"

Printed on recycled paper.

3. Any records shall be retained for a five year period and made available for Department inspection upon request.
4. The operation of this activity shall not cause or contribute to an objectionable odor.
5. If the conditions on which this exemption are based change, the operator shall notify the Department's Bureau of Air Regulation of the changes and request the exemption be amended.
6. Upon the next opening of the facility's Title V operation permit, this paint spray booth will be identified/designated as an "unregulated" emissions unit/activity and placed in Appendix U-1, Unregulated Emissions Units/Activities, for future inventory purposes on an every 5-year basis, starting in year 2000.

This conditional exemption will take effect 21 days from the clerking date unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under 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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within twenty-one 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 twenty-one days of publication of the public notice or within twenty-one days of receipt of this notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within twenty-one 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 Department'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 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; and, (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the request for conditional exemption have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

#### NOTICE OF APPEAL RIGHTS

Any party to this conditional exemption has the right to seek judicial review of it under Section 120.68, F.S., by filing a Notice of Appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this conditional exemption is filed with the Clerk of the Department.

A copy of the conditional exemption and accompanying materials related to the proposed agency action are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the

Walt Disney World Resort  
Conditional Exemption for One Paint Spray Booth  
North Service Area Central Shops Building: Show Props and Vehicles Spray Booth (NSA-19)  
August 29, 2000  
Page 3 of 4

Department of Environmental Protection, Division of Air Resources Management, Suite 23, Magnolia Courtyard, 111 South Magnolia Drive, Tallahassee, Florida 32301, and at the Department's Central Florida District Office, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767.  
Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**



Howard L. Rhodes, Director  
Division of Air Resources Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
(850)488-0114

Walt Disney World Resort  
Conditional Exemption for One Paint Spray Booth  
North Service Area Central Shops Building: Show Props and Vehicles Spray Booth (NSA-19)  
August 29, 2000  
Page 4 of 4

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF CONDITIONAL EXEMPTION and all copies were sent by certified mail before the close of business on 8/30/00 to the person(s) listed:

Mr. Lee Schumde, Vice President, Legal, Walt Disney World Co.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE OF CONDITIONAL EXEMPTION were sent by U.S. mail on the same date to the person(s) listed, unless otherwise noted:

- Mr. Len Kozlov, CD (Interoffice mail)
- Mr. Richard Bumar, P.E., Walt Disney World Co.
- Mr. Scott Sheplak, BAR (hand delivered) - Title & Reading File Copy
- Chair Fancy - Reading File

Clerk Stamp

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

Barbara J. Pentwell 8/30/00  
(Clerk) (Date)

HLR/CHF/bm



WALT DISNEY World Co.

8/22 Scott/Bruce  
pls handle  
Clair

RECEIVED

AUG 22 2000

BUREAU OF AIR REGULATION

August 15, 2000

Mr. Clair Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Installation of one new paint spray booth  
Walt Disney World Central Shops Building

Dear Mr. Fancy:

This letter proposes a conditional exemption from construction permitting requirements for a new paint spray booth at the Walt Disney World Resort (WDW) complex. The spray booth would become part of the North Service Area Central Shops Building emissions unit (E.U.), which is listed as E.U. 007 in the WDW Title V permit, Appendix U-1. The booth is a custom designed model, manufactured by JBI, Inc., and will be used to spray coating materials on show props and vehicles and on transportation vehicles, such as buses and boats. Please designate this spray booth as NSA-19.

Based on the proposed production schedule and material usage rate, the booth has the potential to emit no more than 6.7 tons of Volatile Organic Compounds per year. Please refer to Attachment A for the calculations that verify this amount and for the booth's design drawings. Attachment B shows the location and plot plan of the proposed emissions unit. Attachment C contains the professional engineer's certification and the responsible official's statement.

Since the potential VOC emissions from the operation are below the 40-ton significance threshold established in 62-212 F.A.C., it is requested that the unit be granted a conditional exemption from construction permitting requirements. It is further requested that the spray booth be added to the Walt Disney World Resort's Title V permit upon its next opening.

If you require any further information, please call me at 407-939-4701.

Sincerely,

Rich Bumar, P.E.  
Environmental Control Representative

Enclosure

cc: Leonard Kozlov  
Bruce Mitchell  
Armando Rodriguez (w/o enclosure)  
Lee Schmudde (w/o enclosure)  
Scott Sheplak (w/o enclosure)

# CONDITIONAL EXEMPTION REQUEST

WALT DISNEY WORLD CO.

AUGUST 17, 2000

## SUPPLEMENTAL INFORMATION

### CONTENTS

ATTACHMENT A

- SPRAY BOOTH EMISSIONS CALCULATIONS
- SPRAY BOOTH DESIGN DRAWINGS

ATTACHMENT B

- BOAT MAINTENANCE FACILITY PLOT PLAN
- AREA MAP

ATTACHMENT C

- RESPONSIBLE OFFICIAL'S STATEMENT
- PROFESSIONAL ENGINEER'S CERTIFICATION



**ATTACHMENT A**

**SPRAY BOOTH EMISSIONS CALCULATIONS  
SPRAY BOOTH DESIGN DRAWINGS**

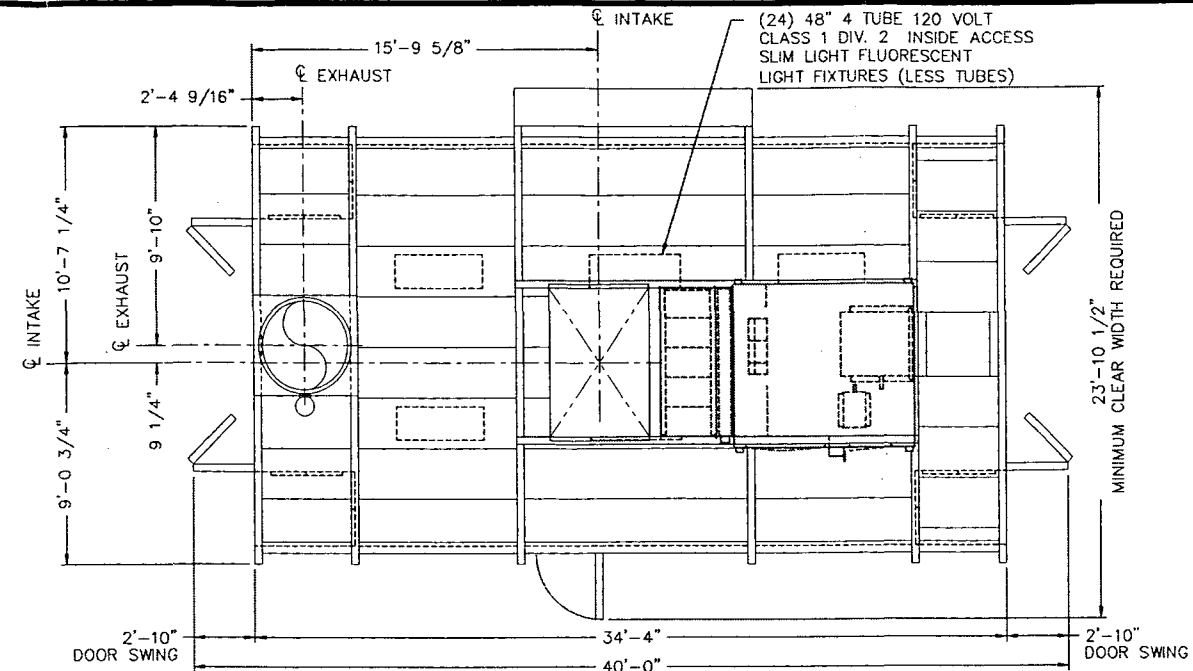
## Attachment A

## Central Shops Spray Booth- NSA-19

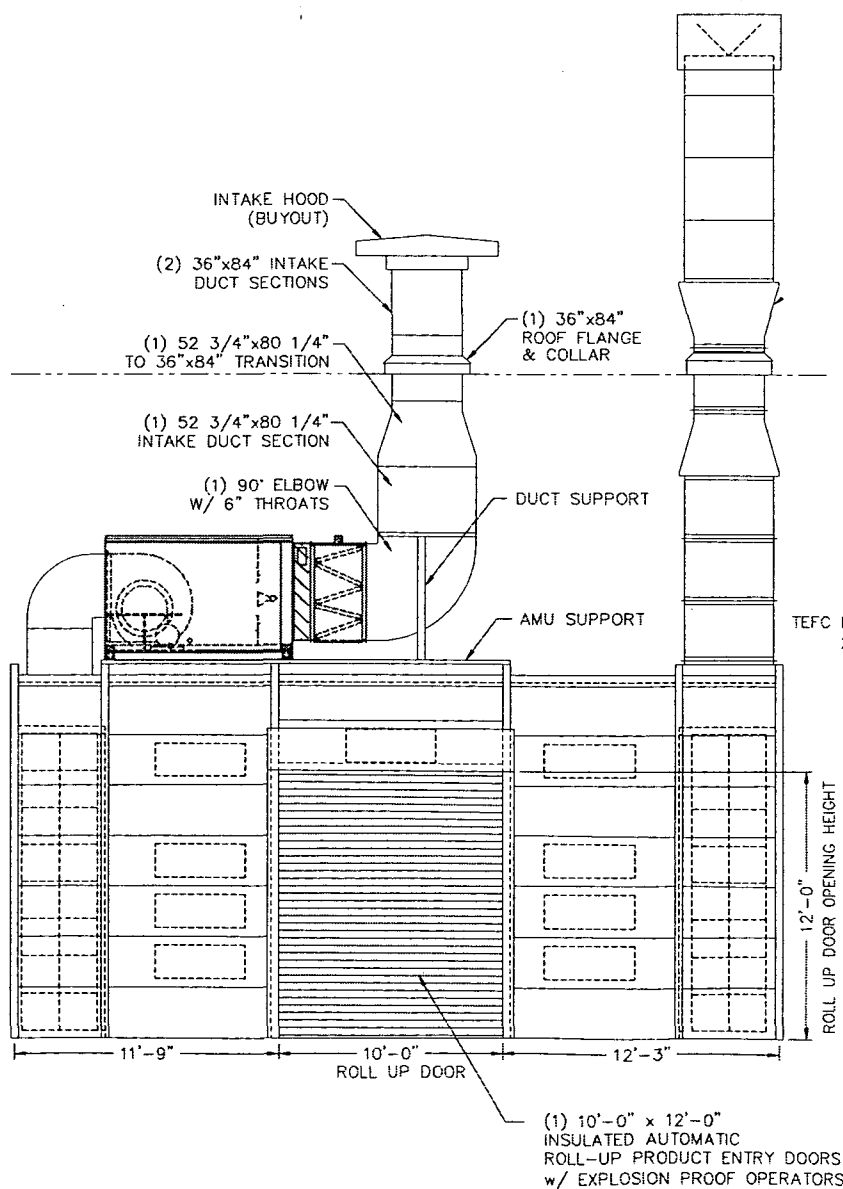
Class	Manufacturer	Material Name	Projected Annual Usage, gal	VOC content, lb/gal	Potential VOC Emissions	
					Annual lb	Annual tons
Acrylic Polyurethane	Akzo	Autocryl, Autobase, Autonova	100	5.9	591	0.30
Epoxy	Akzo	CR Primer	200	5.9	1,180	0.59
Solvent	Akzo	Hardener	200	5.9	1,170	0.59
Solvent	Akzo	Reducer	60	7.6	456	0.23
Acrylic Enamel	DuPont	Imron	150	4.7	705	0.35
Solvent	DuPont	Activator	75	3.8	285	0.14
Urethane Alkyd Enamel	Gavlon	Gavlon 510 (various colors)	100	4.6	460	0.23
Acrylic Polyurethane	Lilly	Amer-Flint	200	4.4	874	0.44
Acrylic Polyurethane	PPG	Matthews Acrythane	500	4.6	2,305	1.15
Epoxy	PPG	DP Epoxies	300	7.4	2,217	1.11
Solvent	PPG	Epoxy Catalyst	75	5.2	390	0.20
Solvent	PPG	Epoxy Reducer	75	6.7	500	0.25
Solvent	PPG	Matthews Catalyst	150	8.0	1,200	0.60
Solvent	PPG	Matthews Reducer	150	7.5	1,125	0.56
<b>Totals</b>			<b>2335 gallons</b>		<b>13,458</b>	<b>6.7</b>

**NOTES:**

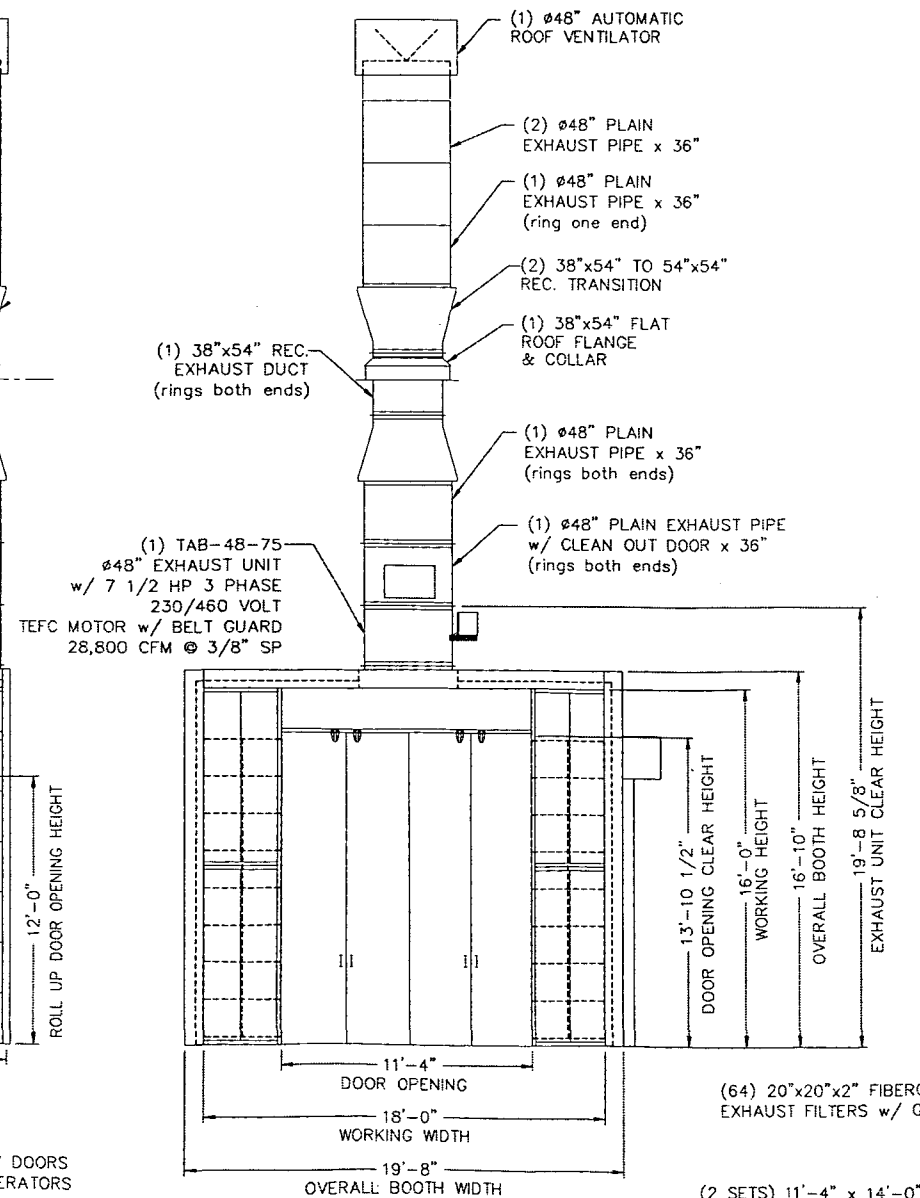
1. BOOTH IS FABRICATED FROM 4" THICK INSULATED PANELS SHEETED BOTH SIDES w/ 20 GAGE ALUMINIZED SHEET STEEL; PANELS HAVE TONGUE AND GROOVE EDGES FOR ASSEMBLY.
2. BOOTH'S SUPPORT STRUCTURE IS FABRICATED FROM W8x10# BEAM COLUMNS; ALL STRUCTURE IS PRE-DRILLED AND FACTORY PRIMED GRAY.
3. INCLUDED, BUT NOT SHOWN:  
(1) NEMA 12 CONTROL PANEL, 480 VOLT w/ AUTOMATIC PRESSURE CONTROL SYSTEM



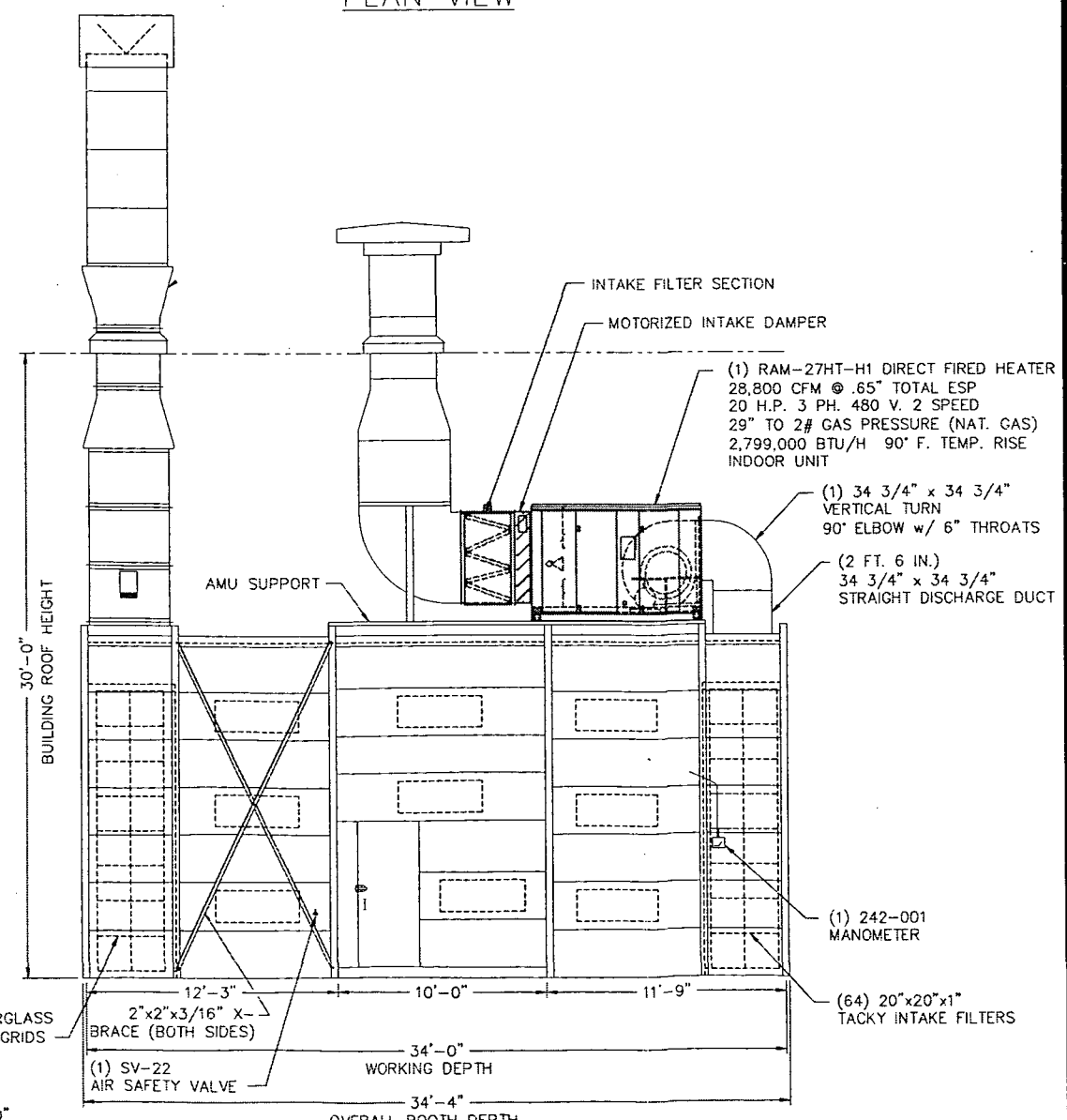
PLAN VIEW



LEFT SIDE ELEVATION



EXHAUST CHAMBER ELEVATION



RIGHT SIDE ELEVATION

THIS DRAWING IS THE PROPERTY OF J.B.I. AND IS NOT TO BE LOANED, REPRODUCED OR COPIED IN ANY MANNER WITHOUT PERMISSION OF J.B.I.

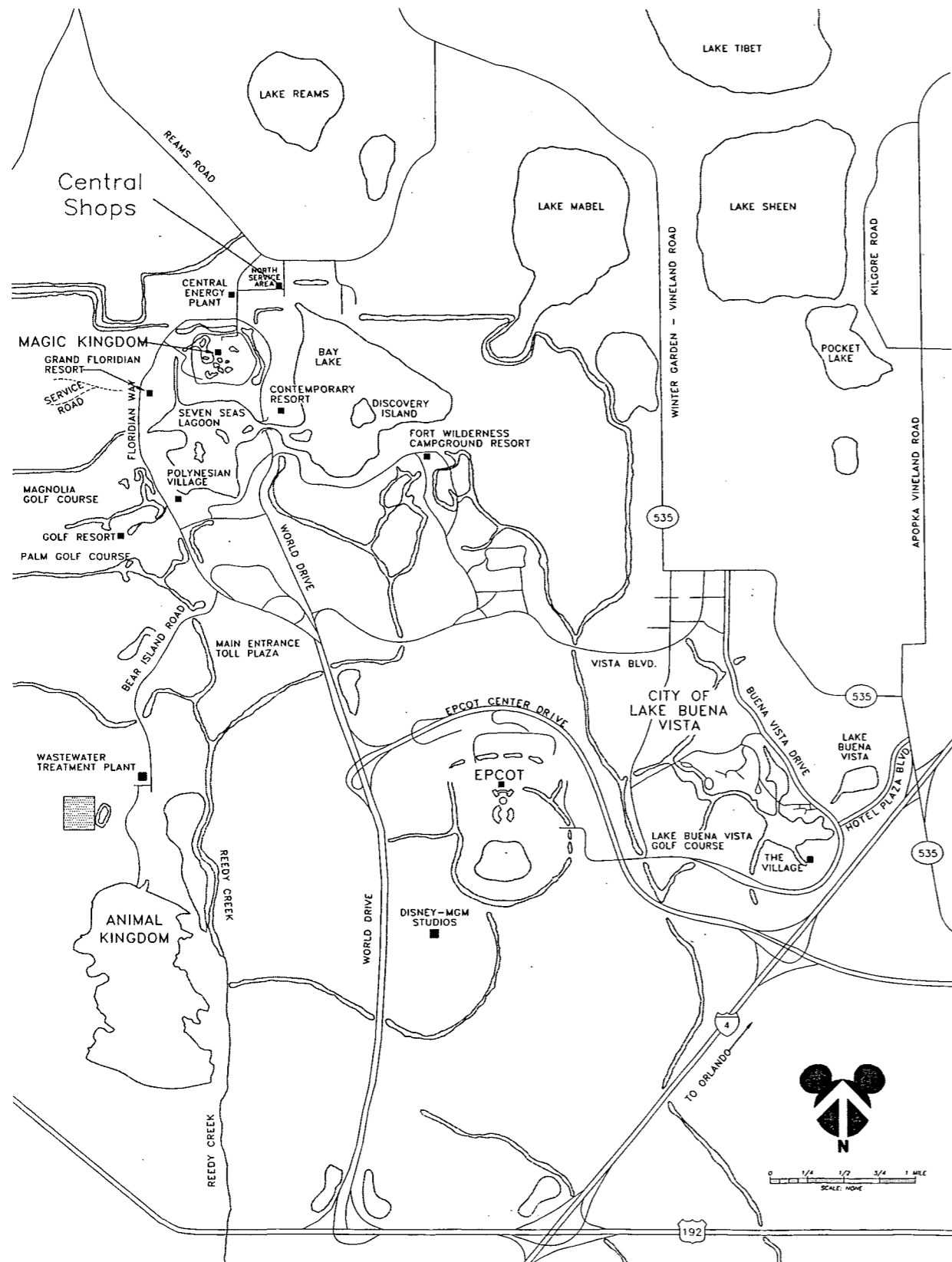
DESIGNED	D.R.S.
DRAWN	Patm. Johnson
CHECKED	PROJECT MGR APPROVED
DATE	4/27/00 (PKJ) ADDED ROLL UP DOOR
SCALE	1/4" = 1'-0"
DATE	4/25/00

J.B.I. SPRAY BOOTHS AND SYSTEMS  
P.O. BOX 250  
12737 NORWAY ROAD  
OSSEGO, WISCONSIN 54758  
PHONE: 1-800-848-8738  
FAX: 715-597-2193  
EMAIL: sales@jbi-booths.com

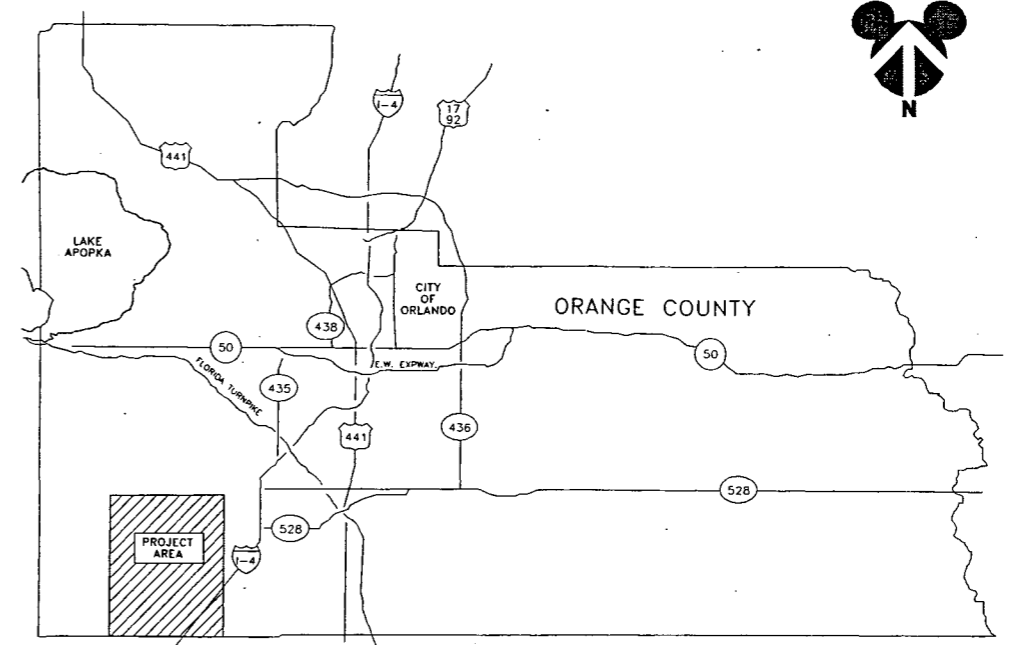
LEE PATTERSON COMPANY for  
WALT DISNEY WORLD CO.

IT-38-PDT-S  
1 of 7  
30935-1

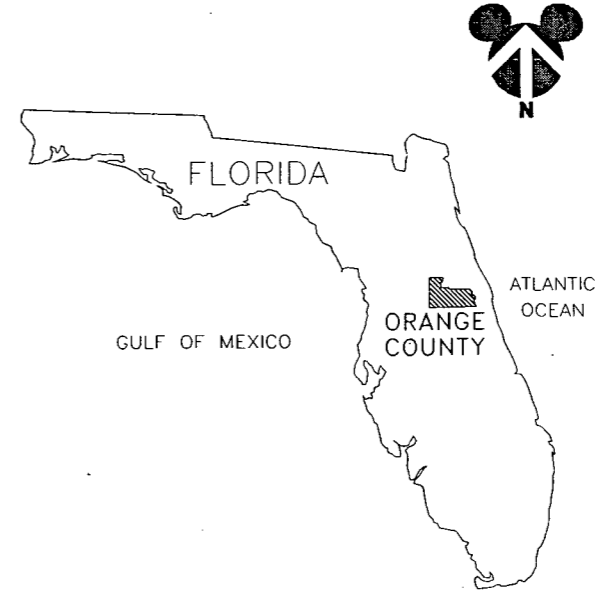
**ATTACHMENT B**  
**FACILITY PLOT PLAN**  
**AREA MAP**



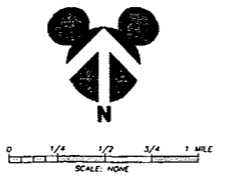
SITE LOCATION MAP



VICINITY MAP

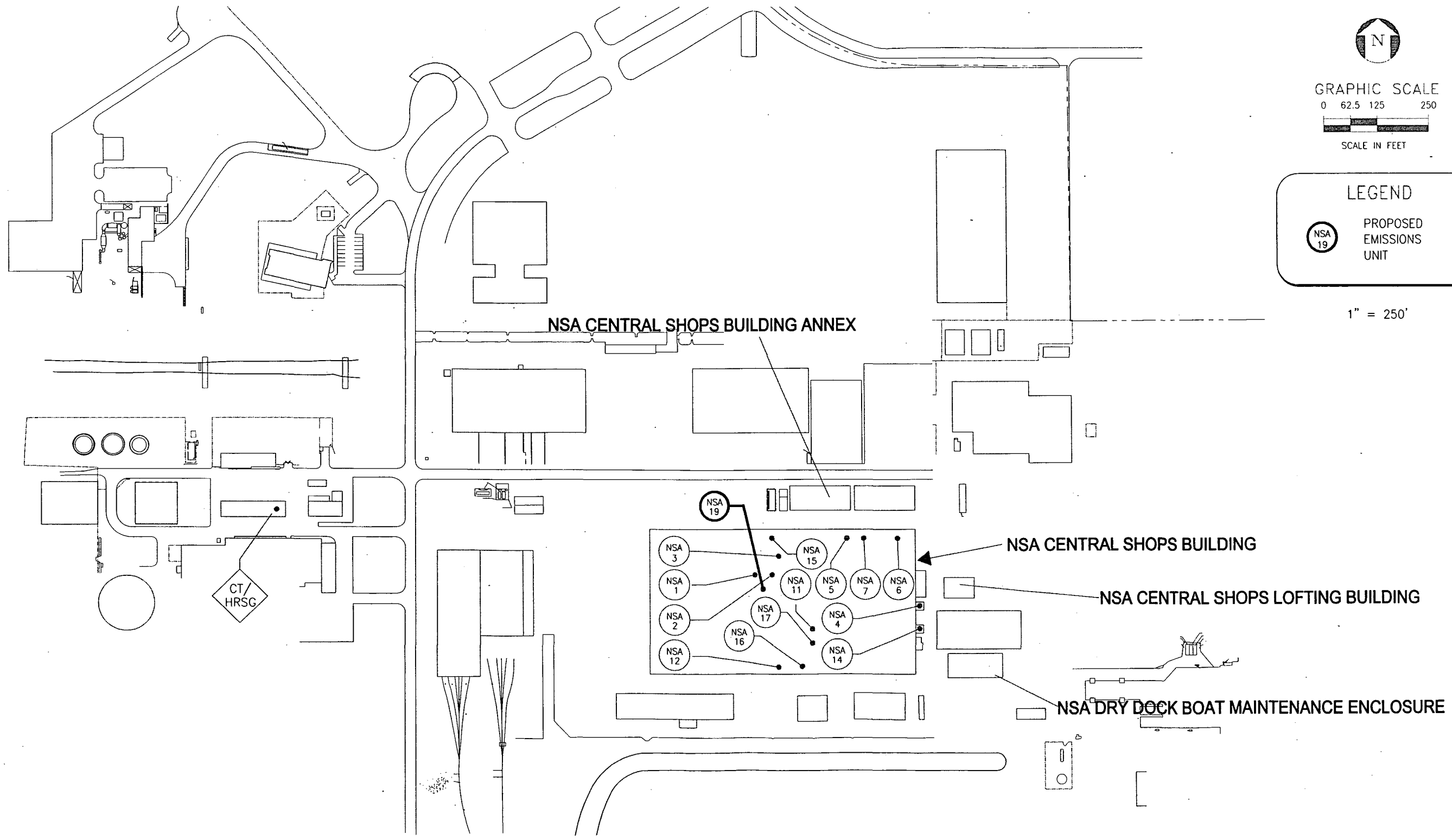


LOCATION MAP



**ATTACHMENT B**  
**AREA MAP SHOWING FACILITY LOCATION**  
**NORTH SERVICE AREA CENTRAL SHOPS BUILDING**





ATTACHMENT B  
FACILITY PLOT PLAN  
NORTH SERVICE AREA CENTRAL SHOPS



**ATTACHMENT C**

**RESPONSIBLE OFFICIAL'S STATEMENT  
PROFESSIONAL ENGINEER'S CERTIFICATION**





4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

*[Signature]*  
Signature

*8/15/00*  
Date

\* Attach any exception to certification statement.

