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MAY 09 2007

BUREAU OF AIR REGULATION

May 8, 2007

Mr. Al Linero, P.E. Title V Section Florida Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399-2400

RE: Construction Permit Application

Walt Disney World Co.

Columbia T.D. Mach 2 Dry Cleaning Machine

Dear Mr. Linero:

Enclosed are four copies of a construction permit application for a new proposed Columbia T.D. Mach 2 80-80 perchloroethylene (PCE) dry cleaning machine. The new machine will replace the existing Multimatic Atlas 45 PCE dry cleaning machine, which is identified as emissions unit 001 in permit 0950111-027-AV. Also included with the application is a data disk with electronic versions of all the information that is being submitted on paper.

The new machine is considered to be a "4th generation" dry cleaning machine which will utilize a carbon adsorber and refrigerated condenser to reclaim the PCE and is a closed loop system with no stack emissions. PCE is routed through the unit and is recycled until it is no longer usable, at which point it will be disposed of as still bottom reside. No PCE will be emitted except as fugitive emissions, which will be minimized by following EPA-prescribed leak detection and repair procedures. A 2005 study by the EPA Office of Air Quality Planning and Standards (OAQPS) found, among other findings, that PCE fugitive emissions from this type of dry cleaning machine should average 0.0085 pounds per ton of clothes cleaned. At the maximum production rate for this machine (24 160-pound loads per day), maximum expected PCE fugitive emissions will be approximately 6 pounds per year. An electronic copy of the OAQPS study is included with the enclosed data disc.

Although the potential to emit PCE is very low, this unit is regulated under the Code of Federal Regulations, Chapter 40, part 63, Subpart M-National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities and should be permitted as a regulated emissions unit. Included in the permit application documentation is a list of the applicable paragraphs from subpart M.

If you have any questions or need any further information, please call me at 407-824-7129.

Sincerely,

Rich Bumar, PE

Sr. Environmental Control Representative

Enclosure

cc: Jim Bradner, P.E.- FDEP Central District Mike Morrow (w/o Attachments) Armando Rodriguez (w/o Attachments) Lee Schmudde (w/o Attachments)



# Department of Environmental Protection EIVED

# Division of Air Resource Management **APPLICATION FOR AIR PERMIT - LONG FORM**

BUREAU OF AIR REGULATION

### I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

### **Air Operation Permit** – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) - Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

### 1. Facility Owner/Company Name: Walt Disney World Co. 2. Site Name: Walt Disney World Resort Complex 3. Facility Identification Number: 0950111 4. Facility Location... Street Address or Other Locator: P.O. Box 10.000 City: Lake Buena Vista County: Orange Zip Code: 32830 5. Relocatable Facility? 6. Existing Title V Permitted Facility?

✓ Yes

 $\square$  No

# Application Contact

⊠ No

Identification of Facility

☐ Yes

<u> </u>	meation Contact
1.	Application Contact Name: Richard A. Bumar, Jr., P.E.
2.	Application Contact Mailing Address Organization/Firm: Walt Disney World Co.
	Street Address: P.O. Box 10,000
	City: Lake Buena Vista State: FL Zip Code: 32830
3.	Application Contact Telephone Numbers
	Telephone: (407) 824-7129 ext. Fax: (407) 824-7455
4.	Application Contact Email Address: rich.bumar@disney.com

### **Application Processing Information (DEP Use)**

2. Project Number(s): 095 0111 - 028 - 90	4. Siting Number (if applicable):

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DEP Form No. 62-210.900(1) - Form

# Purpose of Application

This application for air permit is submitted to obtain: (Check one)
Air Construction Permit
□ Air construction permit.
Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.
Air Operation Permit
☐ Initial Title V air operation permit.
Title V air operation permit revision.
Title V air operation permit renewal.
Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.
Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)
Air construction permit and Title V permit revision, incorporating the proposed project.
Air construction permit and Title V permit renewal, incorporating the proposed project.
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:
☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.
Application Comment
This application is for a new Columbia Mach 2 Tandem 80-80 drycleaning machine, which will replace the dry cleaning machine currently permitted in the WDW Title V permit. The existing unit is listed as E.U. 001 in permit 0950111-027-AV.

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# **Scope of Application**

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
New	Columbia Mach 2 Tandem 80-80 drycleaning machine	ACIF	N/A

Application Processing Fee	
Check one: Attached - Amount: \$	■ Not Applicable

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### **Owner/Authorized Representative Statement**

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name:

Lee Schmudde

2. Owner/Authorized Representative Mailing Address...

Organization/Firm: Walt Disney World Co.

Street Address: P.O. Box 10,000

City: Lake Buena Vista Zip Code: 32830-1000

3. Owner/Authorized Representative Telephone Numbers...

Telephone: (407) 828-1723 ext. Fax: (407) 828-4311

4. Owner/Authorized Representative Email Address: lee.schmudde@disney.com

5. Owner/Authorized Representative Statement:

I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

Signature

Date

5/8/07

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# **Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1.	Application Responsible Official Name: Lee Schmudde
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):
	For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
	For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
	For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
	The designated representative at an Acid Rain source.
3.	Application Responsible Official Mailing Address
	Organization/Firm: Walt Disney World Co.
	Street Address: P.O. Box 10,000
	City: Lake Buena Vista Zip Code: 32830-1000
4.	Application Responsible Official Telephone Numbers
	Telephone: (407) 828-1723 ext. Fax: (407) 828-4311
5.	Application Responsible Official Email Address: lee.schmudde@disney.com
6.	Application Responsible Official Certification:
	I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.
	Signature Date

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<u>Pr</u>	Professional Engineer Certification			
1.	Professional Engineer Name: Richard A. Bumar, Jr.			
	Registration Number: 55375			
2.	Professional Engineer Mailing Address			
	Organization/Firm: Walt Disney World Co.			
	Street Address: P.O. Box 10,000			
	City: Lake Buena Vista State: FL Zip Code: 32830-1000			
3.	Professional Engineer Telephone Numbers			
	Telephone: (407) 824-7129 ext. Fax: (407) 824-7455			
4.	Professional Engineer Email Address: rich.bumar@disney.com			
5.	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.			
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here $\square$ , 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 plan			
ļ	and schedule is submitted with this application.			
	(4) If the purpose of this application is to obtain an air construction permit (check here $\mathbf{x}$ , if so)			
	or concurrently process and obtain an air construction permit and a Title V air operation permit			
Ì	revision or renewal 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.			
	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit			
	revision or renewal 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 confained in such permit.			
/	2 1/1/2 C/8/07			
	Signature Date			
L	(seal) (seal)			
* A	ttach any exception to certification statement.			
-				
2				
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### A. GENERAL FACILITY INFORMATION

## Facility Location and Type

Zone East	Facility UTM Coordinates Zone East (km) 449.70 North (km) 3138.00		Facility Latitude/Longitude     Latitude (DD/MM/SS)     Longitude (DD/MM/SS)		
3. Governmental Facility Code:	4. Facility Status Code: A	3. Governmental Facility Code: 0	4. Facility Status Code: A		
7. Facility Comment					

## **Facility Contact**

	· ·
1.	Facility Contact Name: Armando Rodriguez
2.	Facility Contact Mailing Address Organization/Firm: Walt Disney World Co. Street Address: P.O. Box 10000 City: Lake Buena Vista State: FL Zip Code: 32830-1000
3.	Facility Contact Telephone Numbers:
	Telephone: (407) 824-7486 ext. Fax: (407) 824-7455
4.	Facility Contact Email Address: armando.rodriguez@disney.com

# Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

	mily primary responsi				
1.	Facility Primary Respons	ible Offic	ial Name:		
2.	Facility Primary Respons	ible Offici	ial Mailing Addr	ess	
	Organization/Firm:		S		
	Street Address:				
	City:		State:	Zip Code:	
3.	Facility Primary Respons	ible Offici	ial Telephone Nu	ımbers	
	Telephone: ( ) -	ext.	Fax: ( ) -		
4.	Facility Primary Respons	ible Offic	ial Email Addres	s:	

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## Facility Regulatory Classifications

Check all that would apply following completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1.  Small Business Stationary Source  Unknown				
2. Synthetic Non-Title V Source .				
3. X Title V Source				
4. Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)				
5. Synthetic Minor Source of Air Pollutants, Other than HAPs				
6. Major Source of Hazardous Air Pollutants (HAPs)				
7. Synthetic Minor Source of HAPs				
8.  One or More Emissions Units Subject to NSPS (40 CFR Part 60)				
9. One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)				
10. 🖂 One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)				
11. Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))				
12. Facility Regulatory Classifications Comment:				

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# List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
N/A		

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## **B. EMISSIONS CAPS**

# Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
None					
			W 10-		
			• • • •		
		1			
	1				
	<u>                                       </u>				
7. Facility-Win/A	ide or Multi-Un	it Emissions Cap C	omment:		

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# C. FACILITY ADDITIONAL INFORMATION

# Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document ID: Attachment A Previously Submitted, Date:
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document ID: Attachment B Previously Submitted, Date:
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document ID: Attachment C Previously Submitted, Date:
<u>A</u> c	Iditional Requirements for Air Construction Permit Applications
1.	Area Map Showing Facility Location:  Attached, Document ID:  Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):  X Attached, Document ID: Attachment D
3.	Rule Applicability Analysis:  Attached, Document ID: Attachment E
4.	List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.):  Attached, Document ID: X Not Applicable (no exempt units at facility)
5.	Fugitive Emissions Identification:  Attached, Document ID: Attachment F Not Applicable
6.	Air Quality Analysis (Rule 62-212.400(7), F.A.C.):  Attached, Document ID: Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.):  Attached, Document ID:  Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):  Attached, Document ID: Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):  Attached, Document ID: Not Applicable
10	. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):  Attached, Document ID:   Not Applicable

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# Additional Requirements for FESOP Applications

1	of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):  Attached, Document ID: Not Applicable (no exempt units at facility)						
Addition	Additional Requirements for Title V Air Operation Permit Applications						
	of Insignificant Activities (Required for initial/renewal applications only):  Attached, Document ID: Not Applicable (revision application)						
for rebeing	tification of Applicable Requirements (Required for initial/renewal applications, and evision applications if this information would be changed as a result of the revision g sought):  Attached, Document ID:  Not Applicable (revision application with no change in applicable requirements)						
Note comp	Attached, Document ID: e: A compliance plan must be submitted for each emissions unit that is not in pliance with all applicable requirements at the time of application and/or at any time application processing. The department must be notified of any changes in pliance status during application processing.						
initia	of Equipment/Activities Regulated under Title VI (If applicable, required for al/renewal applications only): Attached, Document ID: Equipment/Activities On site but Not Required to be Individually Listed Not Applicable						
initia	fication of Risk Management Plan Submission to EPA (If applicable, required for al/renewal applications only):						
	Attached, Document ID: Not Applicable						
	uested Changes to Current Title V Air Operation Permit:  Attached, Document D:						
Addition	nal Requirements Comment						
and insig	ee the Walt Disney World Title V permit (0950111-027-AV) for a listing of exempt gnificant activities/emissions units at this facility. The most recent compliance report mitted to the FDEP on February 28 and all emissions units were in compliance.						

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Section [1] of [1]

#### III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II. Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

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Section [1]

of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

# <u>Title V Air Operation Permit Emissions Unit Classification</u>

1.	1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)							
,	☐ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. ☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.							
Em	Emissions Unit Description and Status							
1.	Type of Emis	ssions Unit Addresse	ed in this	Section:	: (Check one)			
	process o	ssions Unit Informater r production unit, or s at least one definal	activity,	which p	produces one or mor	issions unit, a single e air pollutants and		
	process o		nd activit	ies whic	h has at least one de	issions unit, a group of finable emission point		
		ssions Unit Informaticess or production u			•	issions unit, one or itive emissions only.		
2.	•	of Emissions Unit Ad a T.D. Mach 2 80-80						
3.	Emissions U	nit Identification Nu	mber: U	nknown				
4.	Emissions Unit Status Code: C	5. Commence Construction Date: 5/20/07	Dat	rtup	7. Emissions Unit Major Group SIC Code: 7996	8. Acid Rain Unit? ☐ Yes ☑ No		
9.	9. Package Unit: Manufacturer: Columbia Model Number: Mach 2 Tandem 80-80							
10.	10. Generator Nameplate Rating: MW N/A							
11.	10. Generator Nameplate Rating: MW N/A  11. Emissions Unit Comment: This emissions unit will replace the existing perchloroethylene drycleaning machine, E.U 001, permit 09501110027-AV.							

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Section [1] of [1]

## **Emissions Unit Control Equipment**

1 Control Favinment/Mathed(s) Description:							
1. Control Equipment/Method(s) Description:							
PCE vapors are routed through a carbon adsorber and a refrigerated condenser before							
being reclaimed and reintroduced into the solvent tank. No emissions stack is present on this							
machine.							
muchine.							
2. Control Device or Method Code(s): 048, 073							
2. Control Device of Method Code(3). 040, 073							

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# EMISSIONS UNIT INFORMATION Section [1] of [1]

## B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

# **Emissions Unit Operating Capacity and Schedule**

	oughput Rate: 1 160-pound load/	hour				
Maximum Production Rate: 24 loads/day						
	······································					
Maximum Heat Input Rate: N/A million Btu/hr      Maximum Incineration Rate: N/A pounds/hr						
4. Maximum memeration R	•					
	N/A tons/day					
5. Requested Maximum Op						
	24 hours/day	7 days/week				
	52 weeks/year	8760 hours/year				
approximately one hour per l	oad.					

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# EMISSIONS UNIT INFORMATION Section [1] of [1]

# C. EMISSION POINT (STACK/VENT) INFORMATION (Optional for unregulated emissions units.)

# **Emission Point Description and Type**

1. Identification of Point on Plot Plan or		2. Emission Point	Гуре Code:			
Flow Diagram: See Attac	hment A	4				
3. Descriptions of Emission	3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:					
N/A						
4. ID Numbers or Description N/A	ons of Emission U	nits with this Emission	n Point in Common:			
5. Discharge Type Code:	6. Stack Height feet	t: N/A	7. Exit Diameter: N/A feet			
8. Exit Temperature: 77 °F	9. Actual Volui N/A acfm	metric Flow Rate:	10. Water Vapor: N/A %			
11. Maximum Dry Standard F N/A dscfm	Flow Rate:	12. Nonstack Emission Point Height: 0 feet				
13. Emission Point UTM Coo	ordinates	14. Emission Point Latitude/Longitude				
Zone: East (km):		Latitude (DD/MM/SS) N28°25'37"				
North (km)		Longitude (DD/MM/SS) W81°34'30"				
15. Emission Point Comment	:					
   Fugitive emissions only						
, and a sum of the sum						

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Section [1]

of [1]

# D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1.	Fugitive emissions from a operation				oethy	ylene dry cleaning
2.	Source Classification Cod	le (S	CC):	3. SCC Units		
	2420010055			Pounds PC	E en	nitted
4.	Maximum Hourly Rate: 6.8e-4		6.0	Annual Rate:	6.	Estimated Annual Activity Factor: N/A
7.	Maximum % Sulfur: N/A	8.	Maximum N/A	% Ash:	9.	Million Btu per SCC Unit: N/A
10.	Segment Comment:		·			
Se	gment Description and R	ate:	Segment _	of		
	Segment Description (Pro					
2.	Source Classification Cod	le (S	CC):	3. SCC Units	:	
4.	Maximum Hourly Rate:	5.	Maximum	Annual Rate:	6.	Estimated Annual Activity Factor:
7.	Maximum % Sulfur:	8.	Maximum	% Ash:	9.	Million Btu per SCC Unit:
10.	Segment Comment:				1	

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Section [1] of [1]

## E. EMISSIONS UNIT POLLUTANTS

# List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	Primary Control     Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code	
H167	048	073	WP	
			·	

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# POLLUTANT DETAIL INFORMATION [1] of [1]

# F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions
Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit

applying for all all operation	i permit.				
Pollutant Emitted:     Perchloroethylene	2. Total Percent Efficie 100%			ency of Control:	
3. Potential Emissions:	<del></del>		4. Syntl	netically Limited?	
0 lb/hour	0	tons/year	Y	] Yes 🗵 No	
5. Range of Estimated Fugitiv		applicable):			
0 to 0.003 tons	/year				
6. Emission Factor:				7. Emissions	
D.C.				Method Code:	
Reference:				2	
8.a. Baseline Actual Emission	is (if required):	8.b. Baseline			
N/A tons/year		From:		Го:	
9.a. Projected Actual Emission	ns (if required):	9.b. Projected	d Monitori	ng Period:	
0 tons/year		☐ 5 years	☐ 10 ye	ears	
10. Calculation of Emissions:				<u> </u>	
See Attachment F					
11. Potential, Fugitive, and Ac					
PTE is zero; there is no em	ussions stack on t	nis unit.			
1					

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# POLLUTANT DETAIL INFORMATION [1] of [1]

# F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissions:  lb/hour tons/year
5.	Method of Compliance:		
6.	Allowable Emissions Comment (Description N/A	of (	Operating Method):
<u>Al</u>	lowable Emissions Allowable Emissions	of_	_
I.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissions: lb/hour tons/year
5.	Method of Compliance:		
6.	Allowable Emissions Comment (Description	of (	Operating Method):
Al	lowable Emissions Allowable Emissions	of_	_
1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissions: lb/hour tons/year
5.	Method of Compliance:		
6.	Allowable Emissions Comment (Description	of (	Operating Method):

21

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Section [1]

of

[1]

## G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>1</u> of <u>1</u>

1.	Visible Emissions Subtyr	e:	2. Basis for Allowable Rule	Opacity:  Other
3.	Allowable Opacity:			
	Normal Conditions:	% Ex	ceptional Conditions:	%
	Maximum Period of Exce		•	min/hour
1		<u> </u>		
4.	Method of Compliance:			
5	Visible Emissions Comm	ent: N/A		
٦.	Visioic Emissions Comm	ciii. N/A		
		<u> </u>		
<u>Vis</u>	sible Emissions Limitatio	<b>n:</b> Visible Emissi	ons Limitation of	
1	Visible Emissions Subtyr	ne.	2. Basis for Allowable	Onacity:
••	, ioioio Eiiiiosioiio e deily p		Rule	Other
2	Allowahla Ongoituu			
٥.	Allowable Opacity:	0/ C		0/
	Normal Conditions:		ceptional Conditions:	%
	Maximum Period of Exce	ess Opacity Allowe	ed: 	min/hour
4.	Method of Compliance:			
5.	Visible Emissions Comm	ent: N/A		

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# EMISSIONS UNIT INFORMATION Section [1] of [1]

## H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 1

1.	Parameter Code:	Pollutant(s):			
3.	CMS Requirement:	Rule Other			
4.	Manufacturer:				
ļ	Model Number:	Serial Number:			
5. 	Installation Date:	Performance Specification	Test Date:		
7.	Continuous Monitor Comment: N/A				
<u>Co</u>	Continuous Monitoring System: Continuous Monitor of				
l.	Parameter Code:	2. Pollutant(s):			
3.	CMS Requirement:	Rule Other			
4.	Monitor Information Manufacturer: Model Number:	Serial Number:			
5.	Installation Date:	6. Performance Specifica	tion Test Date:		
7.	Continuous Monitor Comment: N/A				

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Section [1] of [1]

## I. EMISSIONS UNIT ADDITIONAL INFORMATION

## Additional Requirements for All Applications, Except as Otherwise Stated

1.	Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document ID: Attachment B Previously Submitted, Date
2.	Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document ID: N/A Previously Submitted, Date
3.	Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document D: N/A Previously Submitted, Date
4.	Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document ID: Previously Submitted, Date  Not Applicable (construction application)
5.	Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)  Attached, Document ID: Previously Submitted, Date  Not Applicable
6.	Compliance Demonstration Reports/Records  Attached, Document ID:  Test Date(s)/Pollutant(s) Tested:
	Previously Submitted, Date:  Test Date(s)/Pollutant(s) Tested:
	To be Submitted, Date (if known):  Test Date(s)/Pollutant(s) Tested:
	⋈ Not Applicable
	Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7.	Other Information Required by Rule or Statute  Attached, Document ID: Not Applicable

DEP Form No. 62-210.900(1) - Form

Section [1] of

# Additional Requirements for Air Construction Permit Applications

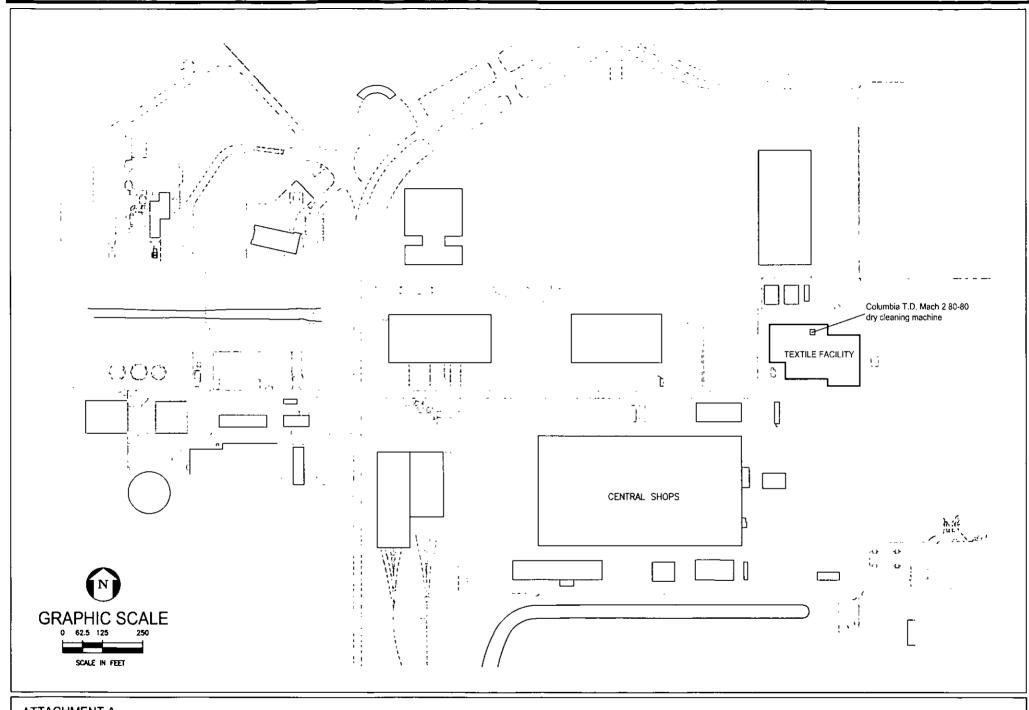
[1]

1.	Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7),				
	F.A.C.; 40 CFR 63.43(d) and (e))				
	Attached, Document ID: Not Applicable				
2.	. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and				
	Rule 62-212.500(4)(f), F.A.C.)				
	Attached, Document ID: Not Applicable				
3.	. Description of Stack Sampling Facilities (Required for proposed new stack sampling				
	facilities only)				
	Attached, Document ID: Not Applicable				
Ad	Additional Requirements for Title V Air Operation Permit Applications				
1.	. Identification of Applicable Requirements				
	Attached, Document ID:				
2.	. Compliance Assurance Monitoring				
	Attached, Document ID: Not Applicable				
3.	. Alternative Methods of Operation				
	Attached, Document ID: Not Applicable				
4.	. Alternative Modes of Operation (Emissions Trading)				
	Attached, Document ID: Not Applicable				
5.	. Acid Rain Part Application				
	Certificate of Representation (EPA Form No. 7610-1)				
	Copy Attached, Document ID:_				
	☐ Acid Rain Part (Form No. 62-210.900(1)(a))				
	Attached, Document ID: Previously Submitted, Date:				
	Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)				
	Attached, Document ID: Previously Submitted, Date:				
	New Unit Exemption (Form No. 62-210.900(1)(a)2.)				
	Attached, Document ID: Previously Submitted, Date:				
	Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)				
	Attached, Document ID: Previously Submitted, Date:				
	Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)				
	Attached, Document ID: Previously Submitted, Date:				
	Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)				
	Attached, Document ID: Previously Submitted, Date:	—			
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DEP Form No. 62-210.900(1) - Form

Additional Requirements Comment				
N/A				

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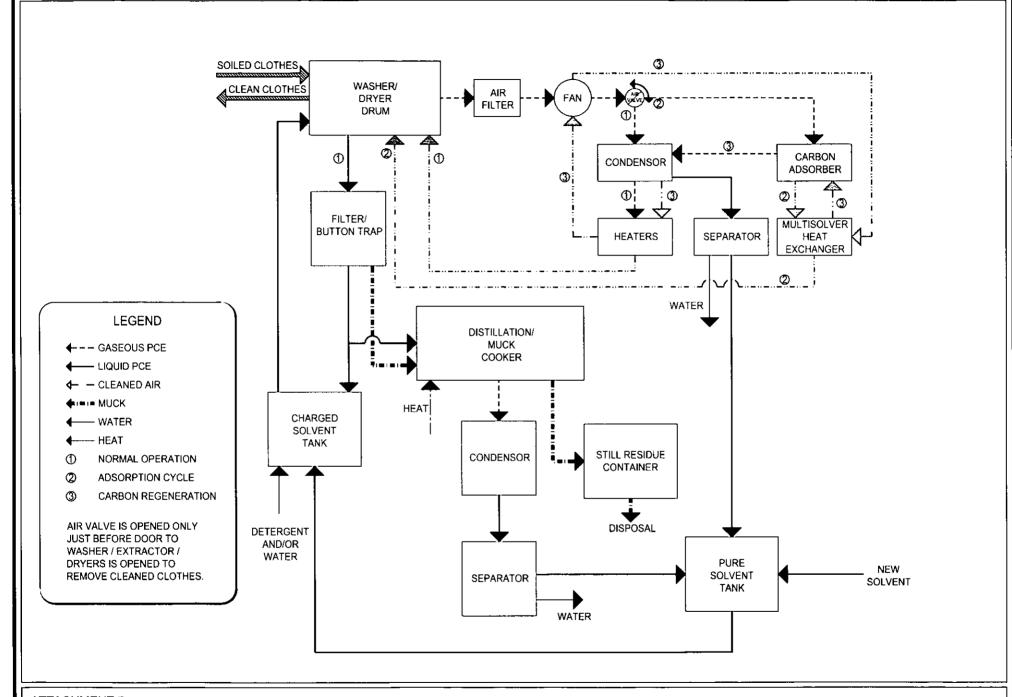


ATTACHMENT A

FACILITY PLOT PLAN

WALT DISNEY WORLD CO. TEXTILE FACILITY

COLUMBIA T.D. MACH 2 80-80 DRY CLEANING SYSTEM



ATTACHMENT B
PROCESS FLOW DIAGRAM
WALT DISNEY WORLD CO. TEXTILE FACILITY
COLUMBIA T.D. MACH 2 80-80 DRY CLEANING SYSTEM

# PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

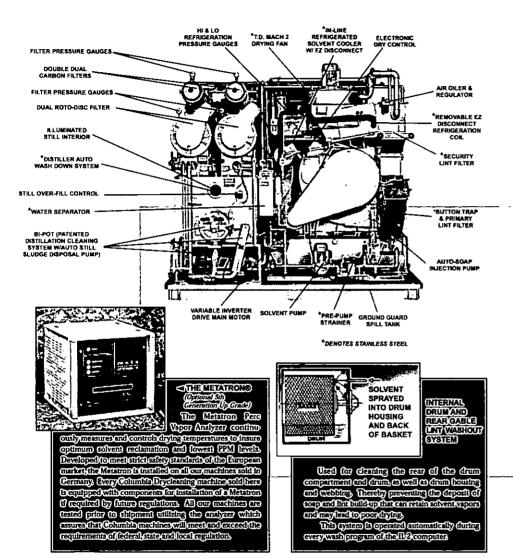
During operations, the following techniques will be used to prevent unconfined particulate matter emissions on an as needed basis:

- Chemical or water application to:
  - o Unpaved roads
  - o Unpaved yard areas
  - o Storage piles
- Paving and maintenance of roads, parking areas and yards
- Landscaping and planting of vegetation
- Confining abrasive blasting where possible
- For the solid waste disposal area, wetting agents shall be applied
- Other techniques, as necessary

### **DESCRIPTION OF PROPOSED CONSTRUCTION**

The proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 drycleaning machine. The machine will replace the currently permitted Multimatic Atlas 45 drycleaning machine, which is listed in the WDW Title V permit (permit number 0950111-027-AV) as emissions unit 001. The new machine is a closed loop design, i.e., no stack or discrete emissions points. Air emissions are expected to occur only as a result of fugitive emissions.

Please refer to the following pages for technical drawings of the machines and a sales brochure describing the machine features.



T.D. Mach 2

4th Generation • Perc

Long Cycle
Times
Have
Officially
Been
Eliminated!

"QUICK DRY" SERIES

COLUMBIA O

TO MACH 2 60 KS

The festest, most innovative daysleading process over developed. The durable TD. Mach 2 is designed to increase output by decreasing total cycle three.

00

**TD MACH 2.80** 

Quick, efficient and reliable performance allows the daydeaner to increase production and profits.

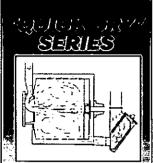


COLUMBIA

All information is factual at time of printing.

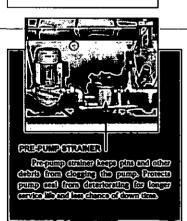


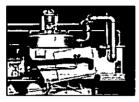
231 EDISON AVENUE, WEST BABYLON, NEW YORK, 11704 • 800-446-5634 • IN NEW YORK (631) 293-7571 • FAX (631) 293-7863 www.drycleaningmachine.com © Columbia / ILSA 7/03



Imagine completing a drying cycle quicker than ever! It's possible with the Columbia/ILSA T.D. Mach 2 "Ouick-Dry" Series. Airflow is directed into the drum center thanks to a special loading door with built-in deflector. The unique recovery section allows for super saturation of the drying air stream prior to reaching the condensing coil. The 95% efficiency of the T.D. Mach 2 is nearly double the efficiency of conventional 4th generation drycleaning systems.

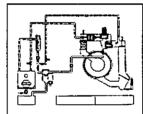
Additionally, the lint filter and button trap are incorporated into the air flow system, and the solvent tanks are inclined for self cleaning and thorough draining. The T.D. Mach 2 reduces cycle time and cost of production while increasing your profitability.





#### **EZ ACCESS SELF-SEALED** REFRIGERATION COILS

Our classic refrigeration group design continues to allow easy accessibility when servicing the refrigeration, heat pump and solvent cooling coils. Engineered and designed with the operator in mind this unique and well proven system allows for the removal of individual refrigeration group components without the loss of freon or the removal of the entire system. This separated system has influenced competitors to "boldly" imitate this Columbia/ILSA original design. Naturally, we are flattered.

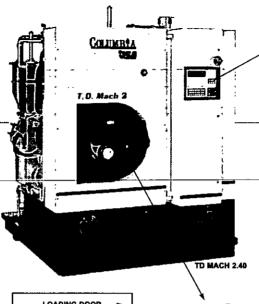


#### DISTILLER AIR DRYING SYSTEM

T.D. Mach 2's Distiller Air Drying System allows for maximum efficiency of distillation without creating hazardous waste contact water,

By executing a program of the IL2 computer, the operator can reduce solvent concentration in the distiller waste stream. Hot air from the heat pump and steam boost coil is carried to the distiller. This air forces the perc vapor at the bottom of the distiller to the distiller condensation coil, similar in concept to "live steam sweeping," but without the addition of water.

The computer control program for distiller drying offers the operator the simplicity of automatic maintenance.

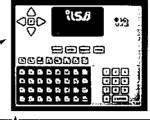


#### LOADING DOOR ---

This innovative patented loading door is one of the reasons for the fast drying time in our "Quick-Dry" series.

Features include: stainless steel construction, built-in deflector, gentle drying and less lint. No "over-drying" of the garments occur.





#### IL-2 COMPUTER

The touch of a button allows easy access to 40 standard and special programs. Each program offers 48 steps with 10 functions per step. Description of programs can be personalized to give easy and efficient

The IL-2 Computer automatically adjusts drying and solvent temperatures and motor speed during each step of the cleaning cycle. It stores data and messages for statistics and checks. It is interfacable with laptop computers and is downloadable. Entire programs can be transferred and copied for easy alterations and adjustments.

Other features include a self-powered clock, cycle. and working hour counters.

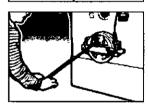
All functions operate automatically: however, the IL-2 computer can be used manually as well. Also any cycle can be manually or automatically interrupted at any time assuring the machine is never down due to computer fault.



Our stainless steel inline refrigerated solvent cooler allows for optimum solvent cleaning performance. Adjust solvent washing temperatures by preset program or instant manual selection. With self-sealing, quick disconnect fittings on the freon coil, servicing is simple. (See E-Z Access Self-Sealed Refrigeration Coils)











## **Features**

- Available in 40, 50, 55, 65. 80, 120 and 160 lb. Capacities
- · Ground Guard Solvent Spill Retention tank
- 100% Air Flow Button Trap Drying System
- . Door Locks & Safety Switches On All Doors
- 316 Stainless Steel in all critical areas including the Recovery Section, Still, Still Riser Pipe and condenser. Water Separator, and Button Trap.
- Programmable Soap Injector • Dual Adjustable Level

Tanks

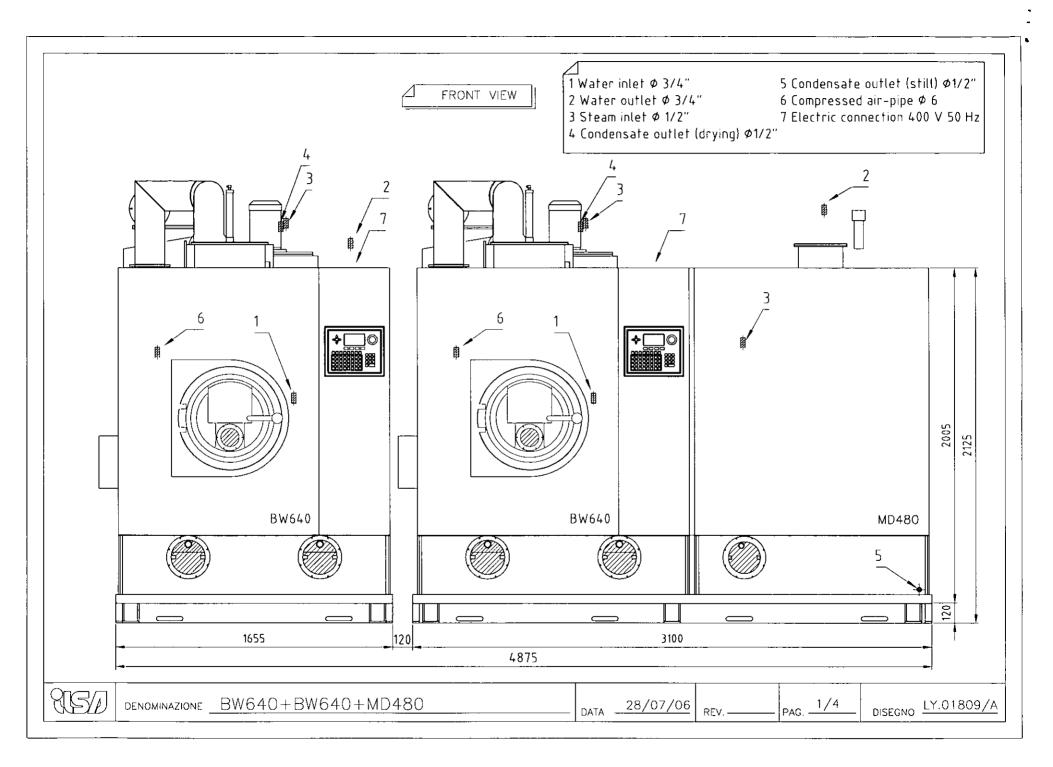
3 Automatic Self-cleaning

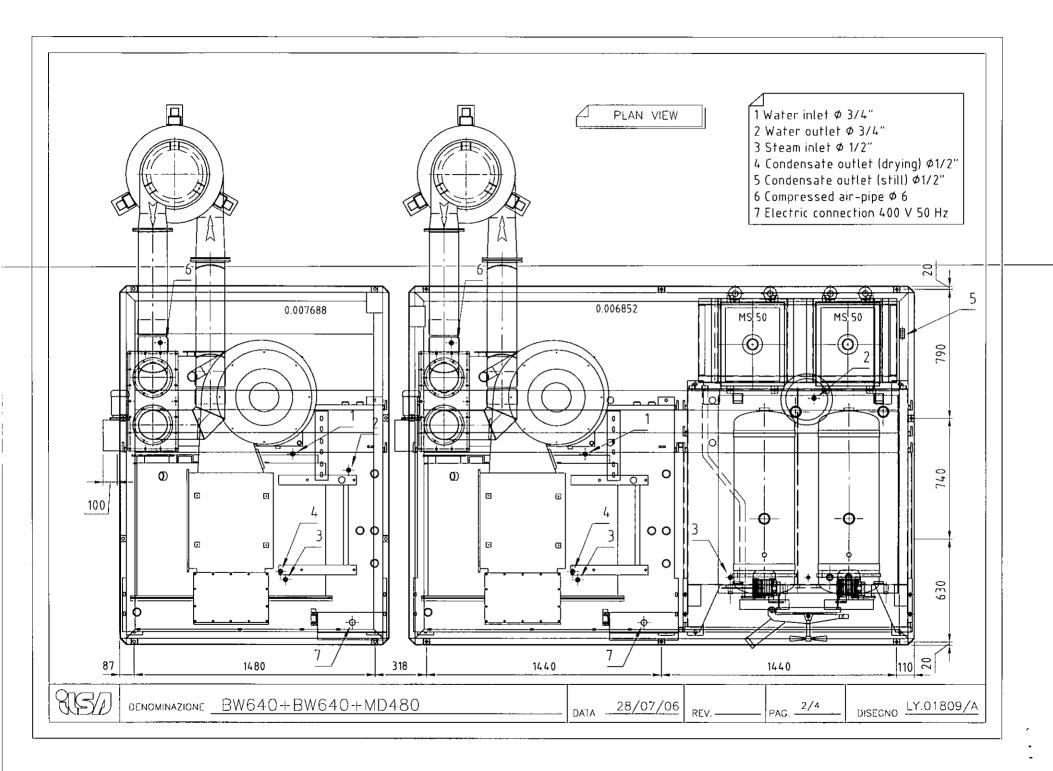
- Controls
- Patented "Quick-Dry" Air Circulation System for Complete Drying

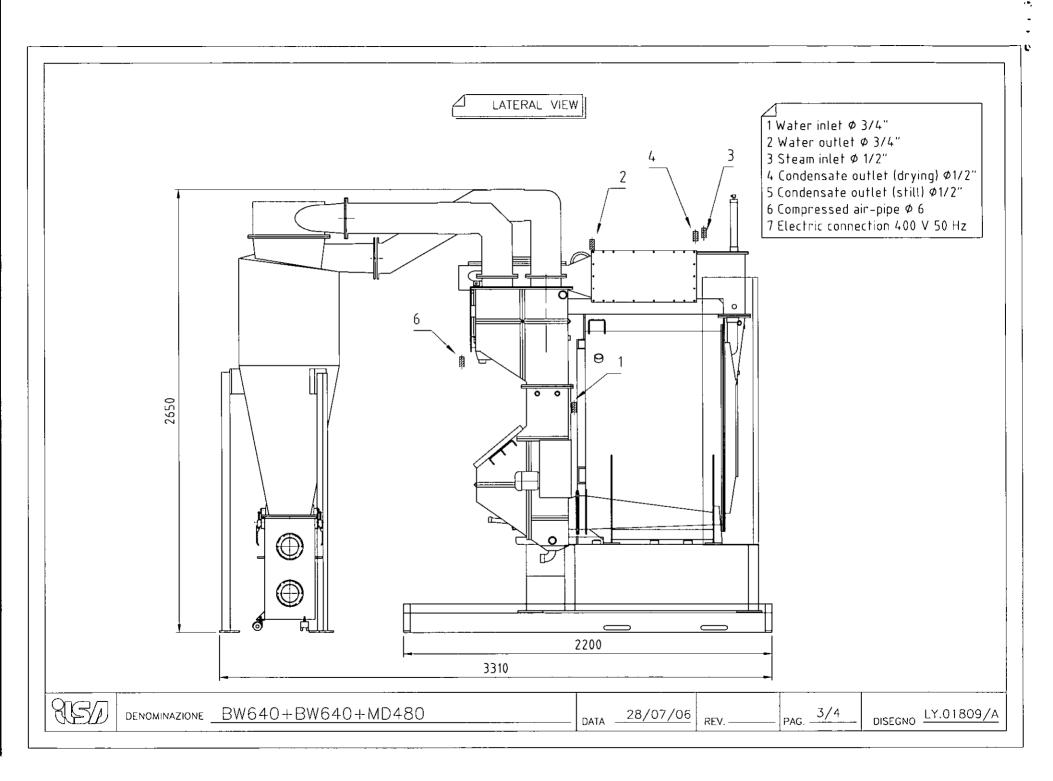


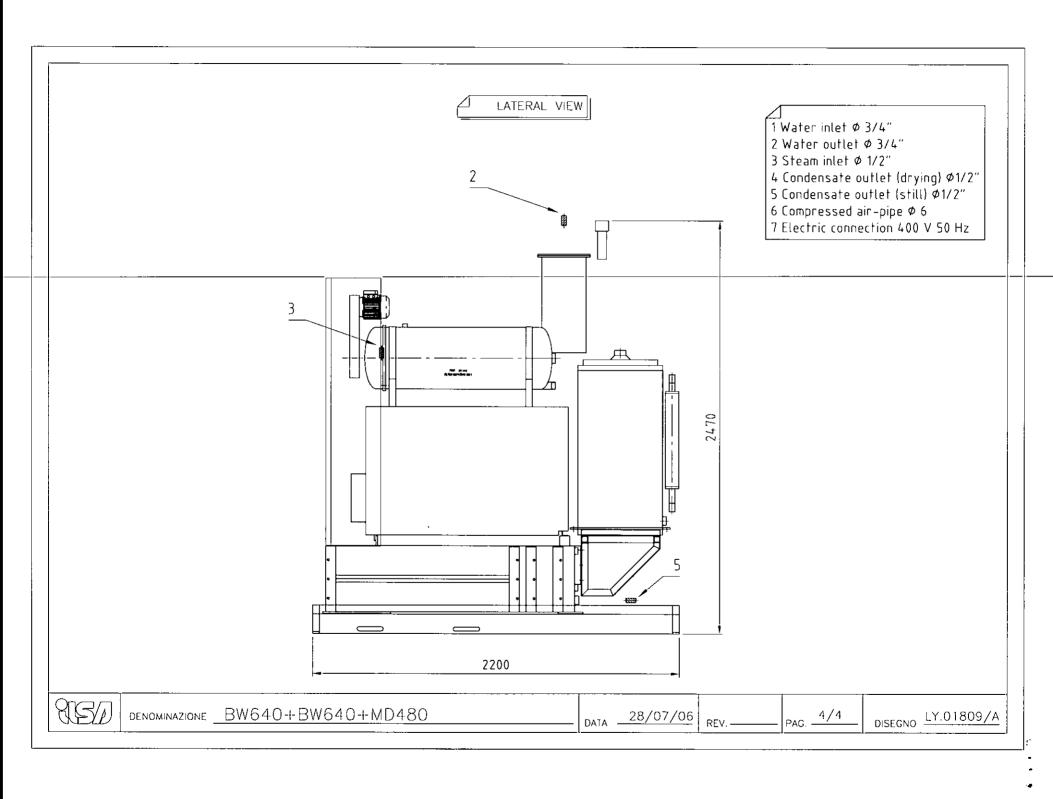
moving rake and a piston type stud your hazardous waste drum. For the or and for the safety of the environment! this is a ci-











#### RULE APPLICABILITY ANALYSIS

The following rules apply to the Columbia T.D. Mach 2 80-80 dry cleaning machine:

PART 63-NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES .....

Subpart M-National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities

#### § 63.320 Applicability.

- (a) The provisions of this subpart apply to the owner or operator of each dry cleaning facility that uses perchloroethylene.
- (b) The compliance date for a new dry cleaning system depends on the date that construction or reconstruction commences.
  - (3) Each dry cleaning system that commences construction or reconstruction on or after July 27, 2006, shall be in compliance with the provisions of this subpart, including Sec. 63.322(o), immediately upon startup.
- (h) A dry cleaning facility is an area source if it does not meet the conditions of paragraph (g) of this section.

#### § 63.322 Standards.

- (a) The owner or operator of each existing dry cleaning system shall comply with either paragraph (a)(1) or (a)(2) of this section and shall comply with paragraph (a)(3) of this section if applicable.
- (b) The owner or operator of each new dry cleaning system:
  - (1) Shall route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device;
- (c) The owner or operator 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.
- (d) The owner or operator of each dry cleaning system shall operate and maintain the system according to the manufacturers' specifications and recommendations.
- (e) Each refrigerated condenser used for the purposes of complying with paragraph (a) or (b) of this section 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 § 63.323(a)(1); and
  - (3) Shall prevent air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- (f) Each refrigerated condenser used for the purpose of complying with paragraph (a) of this section 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 § 63.323(a)(2); and
  - (3) Shall not use the same refrigerated condenser coil for the washer that is used by a dry-to-dry machine, dryer, or reclaimer.
- (g) Each carbon adsorber used for the purposes of complying with paragraphs (a) or (b) of this section:
  - (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 § 63.323 (b) or (c).
- (i) The owner or operator of an affected facility shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility.
- (j) The owner or operator of an affected facility shall store all PCE and wastes that contain PCE in solvent tanks or solvent containers with no perceptible leaks. The exception to this requirement is that containers for separator water may be uncovered, as necessary, for proper operation of the machine and still.

#### RULE APPLICABILITY ANALYSIS

- (k) The owner or operator of a dry cleaning system shall inspect the system weekly for perceptible leaks while the dry cleaning system is operating. Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspection for perceptible leaks. The following components shall be inspected:
  - (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) All filter housings.
- (m) The owner or operator of a dry cleaning system shall repair all leaks detected under paragraph (k) or (o)(1) of this section 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. (n) If parameter values monitored under paragraphs (e), (f), or (g) of this section do not meet the values specified in § 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. (o) Additional requirements:
  - ditional requirements:
    - (1) The owner or operator of a dry cleaning system shall inspect the components listed in paragraph (k) of this section for vapor leaks monthly while the component is in operation.
      - (i) Area sources shall conduct the inspections using a halogenated hydrocarbon detector or PCE gas analyzer that is operated according to the manufacturer's instructions. The operator shall place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface periphery.
      - (iii) Any inspection conducted according to this paragraph shall satisfy the requirements to conduct an inspection for perceptible leaks under Sec. 63.322(k) or (l) of this subpart.
    - (2) The owner or operator of each dry cleaning system installed after December 21, 2005, at an area source shall route the air-PCE gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser and pass the air-PCE gas-vapor stream from inside the dry cleaning machine drum through a non-vented carbon adsorber or equivalent control device immediately before the door of the dry cleaning machine is opened. The carbon adsorber must be desorbed in accordance with manufacturer's instructions.
- § 63.323 Test methods and monitoring.
- (a) When a refrigerated condenser is used to comply with  $\S 63.322(a)(1)$  or (b)(1):
  - (1) The owner or operator shall monitor the following parameters, as applicable, on a weekly basis:
    - (i) The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions.
    - (ii) If the machine is not equipped with refrigeration system pressure gauges, 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 reclaimer with a temperature sensor to determine if it is equal to or less than 7.2 [deg]C (45 [deg]F) before the end of the cool-down or drying cycle while the gas-vapor stream is flowing through the condenser. The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2 [deg]C (45 [deg]F) to an accuracy of 1.1 [deg]C (2 [deg]F).
  - (2) The owner or operator 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

#### RULE APPLICABILITY ANALYSIS

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 °C ( $\pm$  2 °F).
- (ii) The difference between the inlet and outlet temperatures shall be calculated weekly from the measured values.
- (c) If the air-PCE gas vapor stream is passed through a carbon adsorber prior to machine door opening to comply with Sec. 63.322(b)(3) or Sec. 63.322(o)(2), the owner or operator of an affected facility shall measure the concentration of PCE in the dry cleaning machine drum at the end of the dry cleaning cycle weekly with a colorimetric detector tube or PCE gas analyzer to determine that the PCE concentration is equal to or less than 300 parts per million by volume. The owner or operator shall:
  - (1) Use a colorimetric detector tube or PCE gas analyzer designed to measure a concentration of 300 parts per million by volume of PCE in air to an accuracy of 75 parts per million by volume; and
  - (2) Use the colorimetric detector tube or PCE gas analyzer according to the manufacturer's instructions; and
  - (3) Conduct the weekly monitoring by inserting the colorimetric detector or PCE gas analyzer 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.
- (d) When calculating yearly perchloroethylene consumption for the purpose of demonstrating applicability according to § 63.320, the owner or operator 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 § 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 dates when the dry cleaning system components are inspected for leaks, as specified in Sec. 63.322(k),
  - (l), or (o)(1), and the name or location of dry cleaning system components where leaks are detected;
- § 63.324 Reporting and recordkeeping requirements.
- (a) Each owner or operator 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 Administrator within 90 calendar days after September 22, 1993, which includes the following:
  - (1) The name and address of the owner or operator;
  - (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 § 63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to § 63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with § 63.320; and
  - (5) The date and temperature sensor monitoring results, as specified in Sec. 63.323 if a refrigerated condenser is used to comply with Sec. 63.322(a), (b), or (o); and
  - (6) The date and monitoring results, as specified in Sec. 63.323, if a carbon adsorber is used to comply with Sec. 63.322(a)(2), (b)(3), or (o)(2).
- (b) Each owner or operator of a dry cleaning facility shall submit a statement signed by a responsible official in the presence of a notary public to the Administrator by registered letter on or before the 30th day following the compliance dates specified in § 63.320 (b) or (c), certifying the following:
  - (1) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to § 63.323(d);
  - (2) Whether or not they are in compliance with each applicable requirement of § 63.322; and
  - (3) All information contained in the statement is accurate and true.
- (c) Each owner or operator of an area source dry cleaning facility that exceeds the solvent consumption limit certified in paragraph (b) of this section shall submit a statement signed by a responsible official in the presence of a notary public to

#### RULE APPLICABILITY ANALYSIS

the Administrator by registered letter on or before the 30th day following the compliance dates specified in § 63.320(f) or (i), certifying the following:

- (1) The new yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to § 63.323(d);
- (2) Whether or not they are in compliance with each applicable requirement of § 63.322; and
- (3) All information contained in the statement is accurate and true.
- (d) Each owner or operator 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 owner or operator 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 § 63.323(d):
  - (3) The dates when the dry cleaning system components are inspected for perceptible leaks, as specified in § 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 § 63.322(m) and (n);
  - (5) The date and temperature sensor monitoring results, as specified in § 63.323 if a refrigerated condenser is used to comply with § 63.322(a) or (b); and
  - (6) The date and colorimetric detector tube monitoring results, as specified in § 63.323, if a carbon adsorber is used to comply with § 63.322(a)(2) or (b)(3).
- (e) Each owner or operator of a dry cleaning facility shall retain onsite 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.
- (f) Each owner or operator of a dry cleaning facility shall submit to the Administrator or delegated State authority by registered mail on or before July 28, 2008 a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy:
  - (1) The name and address of the owner or operator;
  - (2) The address (that is, physical location) of the dry cleaning facility:
  - (3) If they are located in a building with a residence(s), even if the residence is vacant at the time of this notification;
  - (4) If they are located in a building with no other tenants, leased space, or owner occupants;
  - (5) Whether they are a major or area source;
  - (6) The yearly PCE solvent consumption based upon the yearly solvent consumption calculated according to Sec. 63.323(d);
  - (7) Whether or not they are in compliance with each applicable requirement of Sec. 63.322; and
  - (8) All information contained in the statement is accurate and true.

#### **FUGITIVE EMISSIONS IDENTIFICATION**

No significant fugitive emissions are expected from the dry cleaning machine. Fugitive emissions are expected to be 6 pounds of perchloroethylene per year from this type of machine if the machine is maintained according to manufacturer's specifications. Leak detection and repair procedures will be utilized to minimize fugitive emissions according to 40 CFR 63 Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

### Fugitive emissions calculations

Maximum production rate = 24 loads/day Maximum weight per load = 160 pounds/load Maximum production schedule = 365 days/year

Maximum annual production = 24 loads/day x 160 pounds/load x 365 days/year

= 1,401,600 pounds cleaned/year

= 1,401,600 pounds  $\div 2000$  pounds /ton

= 701 tons cleaned/year

Fugitive emissions factor = 0.0085 pounds PCE/ton cleaned

Fugitive emissions = 701 tons cleaned/year x 0.0085 pounds PCE/ton cleaned

= 6.0 pounds PCE/year

Reference: Appendix IV. <u>Perchloroethylene Dry Cleaners Refined Human Health Risk Characterization</u>, Neal Fann, Risk and Exposure Assessment Group, OAQPS, November 14, 2005. http://www.epa.gov/ttn/atw/dryperc/11-14-05riskassessment.pdf