

Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

PERMITTEE

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

Mr. Lee Schmudde, Authorized Representative

Air Permit No. 0950111-028-AC Facility ID No. 0950111 SIC No. 7996 Dry Cleaning Machine

Permit Expires: December 31, 2008

PROJECT AND LOCATION

This permit authorizes installation of a new dry cleaning machine at the Walt Disney World Resort Complex (the facility). This machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine. The facility is located in both Orange and Osceola Counties, at 1375 Buena Vista Drive in Lake Buena Vista, Florida.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Parts 60 and 63 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

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Joseph Kahn, Director

Division of Air Resource Management

JK/tlv/sms/tbc

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

Electronically Sent - Received Receipt Requested

In the Matter of an Application for Permit by:

Walt Disney World Company P.O. Box 10,000 Lake Buena Vista, FL 32830-1000 DEP File No. 0950111-028-AC Walt Disney World Resort Complex Dry Cleaning Machine

Authorized Representative:

Mr. Lee Schmudde, Authorized Representative

Enclosed is Final Air Construction Permit No. 0950111-028-AC that authorizes installation of a new dry cleaning machine at the Walt Disney World Resort Complex. This machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine. The facility is located in both Orange and Osceola Counties, at 1375 Buena Vista Drive in Lake Buena Vista, Florida. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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 (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Cin William

Trina L. Vielhauer, Chief Bureau of Air Regulation

CERTIFICATE OF SERVICE

Lee Schmudde, Walt Disney World Company: lee.schmudde@disney.com

Richard A. Bumar, Jr., P.E., Walt Disney World Company: rich.bumar@disney.com

Jim Bradner, P.E., Central District Office: james.bradner@dep.state.fl.us

Katy Forney, EPA Region 4: forney.kathleen@epa.gov
James Little, EPA Region 4: little.james@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department

Glerk, receipt of which is hereby acknowledged.

MEMORANDUM

To:

Joseph Kahn

From:

Trina L. Vielhauer

Subject:

Walt Disney World Resort Complex

Air Construction Permit No. 0950111-028-AC

Date:

July 2, 2007

Attached is the final air construction permit for the subject facility. This permit authorizes installation of a new dry cleaning machine at the Walt Disney World Resort Complex. This machine replaces the currently permitted Multimatic Atlas 45 dry cleaning machine.

The Department distributed an "Intent to Issue Permit" package on June 7, 2007. The applicant published the "Public Notice of Intent to Issue" in the Orlando Sentinel on June 11, 2007. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. No comments were received from the applicant, EPA Region 4, or the public at large on the Intent to Issue the Air Construction Permit package.

I recommend your signature.

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection Division of Air Resource Management Bureau of Air Regulation, Permitting South Section 2600 Blair Stone Road, MS 5505 Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0950111-028-AC

Walt Disney World Resort Complex

This permit authorizes installation of a new dry cleaning machine at the Walt Disney World Resort Complex. This machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine. It also establishes these changes as applicable Title V air operation permit conditions.

NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on June 7, 2007. The applicant published the "Public Notice of Intent to Issue" in the Orlando Sentinel on June 11, 2007. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. No comments were received from the applicant, EPA Region 4, or the public at large on the Intent to Issue the Air Construction Permit package.

CONCLUSION

The final action of the Department is to issue the permit with no changes.

FACILITY AND PROJECT DESCRIPTION

This Walt Disney resort 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 proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 dry cleaning machine. The machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine, which is listed in the facility's current Title V Air Operation Permit 0950111-027-AV as emissions unit 1 (EU 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.

The new machine is considered a "4th generation" dry cleaning machine which will utilize a carbon adsorber and refrigerated condenser to reclaim perchloroethylene (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 residue. 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 (OAPQS) 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 (*Perchloroethylene Dry Cleaners Refined Human Health Risk Characterization*, Neal Fann, Risk and Exposure Assessment Group, OAQPS, November, 2005). At the maximum production rate for this machine (twenty-four 160-pound loads per day), maximum expected PCE fugitive emissions will be approximately 6 pounds per year.

| | | Emission Unit Description | |
|----|----------------------|---------------------------|--|
| 12 | Dry Cleaning Machine | | |

REGULATORY CLASSIFICATION

<u>Title I, Section 112, CAA</u>: The facility is a "Major Source" of hazardous air pollutants (HAPs). The new dry cleaning machine is regulated under NESHAP – 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

<u>Title IV</u>: The facility operates existing units subject to the Acid Rain provisions of the Clean Air Act (CAA).

<u>Title V</u>: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major stationary source in accordance with Rule 62-212.400, F.A.C.

<u>NSPS</u>: The facility operates units subject to New Source Performance Standards (NSPS) in 40 CFR 60 including:

- 40 CFR 60, Subpart A General Provisions.
- 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and 40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978).

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR).

SECTION 1. GENERAL INFORMATION

RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete; the draft permit package including the Department's Technical Evaluation and Preliminary Determination; and the Department's Final Determination.

- 1. <u>Permitting Authority</u>: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.
- Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office. The mailing address and phone number of the Central District Office is: 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803; Telephone: 407/894-7555; Fax: 407/897-5963.
- 3. <u>Appendices</u>: The following Appendices are attached as part of this permit: Appendix GC (General Conditions); and Appendix C (Common State Regulatory Requirements).
- 4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
- 5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
- 6. <u>Modifications</u>: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
- 7. <u>Title V Permit</u>: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Bureau of Air Regulation with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

This section of the permit addresses the following emissions unit.

AIR RESOURCE MANAGEMENT SYSTEM (ARMS) Emissions Unit 121

The proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 dry cleaning machine. The machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine, which is listed in the facility's current Title V Air Operation Permit 0950111-027-AV as emissions unit 1 (EU 001). The new machine is a closed loop design, i.e., there are no stack emissions or other discrete emissions points. Air emissions are expected to occur only as a result of fugitive emissions.

{Permitting Note: The following rule applies 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.}

{Permitting Note: The unit remains subject to the applicable requirements of current Title V Air Operation Permit No. 0950111-027-AV.}

PREVIOUS APPLICABLE REQUIREMENTS

Other Permits. The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of these permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. [Rule 62-4.070, F.A.C.]

EQUIPMENT AND PERFORMANCE RESTRICTIONS

2. Dry Cleaning Machine. This permit authorizes the construction activities necessary to add a new dry cleaning machine, considered "4th generation" technology, which utilizes a carbon adsorber and refrigerated condenser to reclaim perchloroethylene (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 is disposed of as still bottom residue. No PCE is emitted except as fugitive emissions, which is minimized by following EPA-prescribed leak detection and repair procedures. [Applicant request.]

STANDARDS

- 3. The following specific conditions are from NESHAP 40 CFR 63.322 and the original numbering is maintained:
 - (a) [Not 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.
- (h) [Not applicable.]
- (i) [Not applicable.]
- (j) [Not applicable.]
- (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.
- (1) [Not applicable.]
- (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:
 - (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.
 - (ii) [Not applicable.]
 - (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 nonvented 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.

[40 CFR 63.322]

TEST METHODS AND MONITORING

- 4. The following specific conditions are from NESHAP 40 CFR 63.323 and the original numbering is maintained:
 - (a) When a refrigerated condenser is used to comply with § 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 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.
 - (b) [Not applicable.]

- (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)(l), and the name or location of dry cleaning system components where leaks are detected.

[40 CFR 63.323]

REPORTING AND RECORDKEEPING REQUIREMENTS

- 5. The following specific conditions are from NESHAP 40 CFR 63.324 and the original numbering is maintained:
 - (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 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.

[40 CFR 63:324]

- 6. Construction Notifications. Within 15 days of beginning construction, the permittee shall notify the Compliance Authority that construction has commenced. Within 15 days of completing construction, the permittee shall notify the Compliance Authority that construction has concluded. Each notification shall include an updated proposed schedule of activities through the initial shakedown period and initial testing.

 [Rule 62-4.070(3), F.A.C.]
- 7. <u>Test Reports.</u> The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in the facility's current Title V Air Operation Permit. [Rule 62-297.310(8), F.A.C.]

General Permit Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

- 1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

General Permit Conditions

- arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C

COMMON STATE REGULATORY REQUIREMENTS

{Permitting Note: Unless otherwise specified by permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

- 1. <u>Plant Operation Problems</u>: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
- 2. <u>Circumvention</u>: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
- 3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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.]
- 4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- 5. Excess Emissions Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program 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.]
- 6. <u>VOC or OS Emissions</u>: No person shall 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. [Rule 62-296.320(1), F.A.C.]
- 7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(217), F.A.C.]
- 8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
- 9. <u>Unconfined Particulate Emissions</u>: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. 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 two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

SECTION 4. APPENDIX C

COMMON STATE REGULATORY REQUIREMENTS

- 11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the 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. [Rule 62-297.310(2), F.A.C.]
- 12. <u>Calculation of Emission Rate</u>: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
- 13. <u>Test Procedures</u>: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. Required Sampling Time. 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. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

14. 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.]

- 15. <u>Sampling Facilities</u>: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
- 16. <u>Test Notification</u>: 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. [Rule 62-297.310(7)(a)9, F.A.C.]
- 17. 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 shall 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. [Rule 62-297.310(7)(b), F.A.C.]
- 18. <u>Test Reports</u>: 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. 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. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to

SECTION 4. APPENDIX C

COMMON STATE REGULATORY REQUIREMENTS

determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP 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.]

RECORDS AND REPORTS

- 19. <u>Records Retention</u>: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
- 20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

Orlando Sentinel

Published Daily

NOVER 1407

State of Florida S.S.

| Before the undersigned authority personally appeared | Rachael Washington |
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| | WHO OH HAIH SAVS |
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| Affiant further says that the said Orlando Sentinel is a | newspaper published at |
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| and that the said newspaper has heretofore been co said Orange | County, Florida, |
| each Week Day and has been entered as second-clas | s mail matter at the post |
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| Orange or a period of one year next preceding the first pub | County, Florida, |
| copy of advertisement; and affiant further says that | he/she has neither paid |
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PUBLIC NOTICE OF INTENT AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION

DEP FIIs No. 0950111-028-AC

Walt Disney
World Reson Complex
Dry Cleaning Machine
Drongs and Osceola Counties

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The Depor Imperir of Environmental Profection (Deportment) average of the Internation of the Internation of the Internation of the Internation Dermit to Worth Internation Dermit to Worth Internation Dermit Company to Install to dry Cleoning machine at Its facility in Oronge and Oscento Counties. A review Under the rules for the Prevention of Significant Deterferation of Air Ouglily (PSD) and a determination of technology (BACT) were not required. The new plicality name and address are Worl Disney World Company P.O. Box 10.000, Loke Busine Vista, Florida 2023/1000

The Walt Disney World resort is a complex of hotels, theme parks and support a clittes, and a utility. The various air, pollution sources are boilers, a combined cycle combustion for the with a natural logs-tired heal recovery steam genertior, pain spray booths and associated aperations, exlernal combustion, oil healers and hot water, heaters.

The proposed construction involves the installation and operation of a Columbia 1-D. Mach 2 80-80 dyclesuring machine. The machine will replace the currently permitted Multimotic Atlos 45 dry. cleaning machine is a closed loop design, i.e., no stock or discrete emissions points. Air emissions are expected to occur only or a result of fugility emissions, are

The new mochine is considared o 24th generation? dry cleaning machine which will utilize a carbon adsor-

ber and retriserated condenser to recialim parchioroethylene (PCE) and is a closed load system with no stack emissions. PCE is routed frough the unit and is recycled until It is no longer usable of which point it will be disposed of its still bottom residue. No PCE will be emitted except as full live emissions, which will be minimized by following EPA-prescribed load detection and repair procedures:

The Deportment will issue the Final Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

BEST AVAILABLE COPY

viniten comments and reuvants for a public meeting
concerning the arraposed
permit issuance action for a
period of 14 days from the
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issue Air Construction Parmit. Writen comments
should be provided for the
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From:

Harvey, Mary

Sent:

Thursday, June 07, 2007 2:59 PM

To:

'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney

World Company:'; Bradner, James

Cc:

Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject:

Walt Disney World Company - DEP File #0950111-029-AC-DRAFT

Attachments: 0950111.028.AC.D_pdf.zip

028

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

From:

Harvey, Mary

Sent:

Thursday, June 07, 2007 3:03 PM

To:

'Ms. Kathleen Forney, EPA Region 4'; 'James Little, EPA Region 4:'

Cc:

Cascio, Tom; Adams, Patty

Subject:

FW: Walt Disney World Company - DEP File #0950111-028-AC-DRAFT

Attachments: Appendix C 2007 - DEP #0950111-028-AC-DRAFT.PDF; Appendix GC 2007 - DEP #0950111-028-AC-DRAFT.PDF; Draft AC Cover Page 2007 - DEP #0950111-028-AC-DRAFT.PDF; Draft AC Section 1 2007 - DEP #0950111-028-AC-DRAFT.PDF; Draft AC Section 2 2007 - DEP #0950111-028-AC-DRAFT.PDF; Draft AC Section 3 2007 - DEP #0950111-028-AC-DRAFT.PDF; Draft Technical Evaluation 2007 - DEP #0950111-028-AC-DRAFT.PDF; Intent to Issue Permit 2007 - DEP #0950111-028-AC-DRAFT.PDF; Letter 2007 -

DEP #0950111-028-AC-DRAFT.PDF; Public Notice 2007 - DEP #0950111-028-AC-

DRAFT.PDF: SIGNED DOCUMENTS - DEP #0950111-028-AC-DRAFT.pdf

From: Harvey, Mary

Sent: Thursday, June 07, 2007 2:59 PM

To: 'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney World Company:';

Bradner, James

Cc: Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

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Thank you,

DEP, Bureau of Air Regulation

From:

Harvey, Mary

Sent:

Thursday, June 07, 2007 3:13 PM

To:

Adams, Patty

Subject:

FW: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

From: Bradner, James

Sent: Thursday, June 07, 2007 3:07 PM

To: Harvey, Mary

Subject: Read: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

Your message

To:

'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney World Company:'; Bradner, James

Cc:

Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject:

Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

Sent:

6/7/2007 2:59 PM

was read on 6/7/2007 3:06 PM.

From:

Harvey, Mary

Sent:

Thursday, June 07, 2007 3:04 PM

To:

Adams, Patty, Cascio, Tom

Subject:

FW: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

From: Bumar, Rich [mailto:Rich.Bumar@disney.com]

Sent: Thursday, June 07, 2007 3:00 PM

To: Harvey, Mary

Subject: Read: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

Your message

To: Rich.Bumar@email.disney.com

Subject:

was read on 6/7/2007 3:00 PM.

From:

Harvey, Mary

Sent:

Thursday, June 07, 2007 4:09 PM

To:

Adams, Patty; Cascio, Tom

Subject:

FW: FW: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

----Original Message----

From: Little.James@epamail.epa.gov [mailto:Little.James@epamail.epa.gov]

Sent: Thursday, June 07, 2007 4:07 PM

To: Harvey, Mary

Cc: Forney.Kathleen@epamail.epa.gov

Subject: Re: FW: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

EPA Region 4 received.

Jim Little

"Harvey, Mary" <Mary.Harvey@dep .state.fl.us>

06/07/2007 03:02

Kathleen Forney/R4/USEPA/US@EPA, James Little/R4/USEPA/US@EPA

CC

То

PΜ

"Cascio, Tom" <Tom.Cascio@dep.state.fl.us>, "Adams, Patty" <Patty.Adams@dep.state.fl.us> Subject

FW: Walt Disney World Company -DEP File #0950111-027-AC-DRAFT

From: Harvey, Mary

Sent: Thursday, June 07, 2007 2:59 PM

To: 'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney

World Company: '; Bradner, James

Cc: Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject: Walt Disney World Company - DEP File #0950111-027-AC-DRAFT

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Thank you,

DEP, Bureau of Air Regulation

[attachment "Appendix C 2007 - DEP #0950111-028-AC-DRAFT.PDF" deleted by James Little/R4/USEPA/US] [attachment "Appendix GC 2007 - DEP #0950111-028-AC-DRAFT.PDF" deleted by James Little/R4/USEPA/US] [attachment "Draft AC Cover Page 2007 - DEP #0950111-028-AC-DRAFT.PDF"

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MEMORANDUM

To:

Trina Vielhauer

Through:

Scott Sheplak

From:

Tom Cascio

Date:

June 7, 2007

Subject:

Draft Air Construction Permit No. 0950111-028-AC

Walt Disney World Resort Complex

This Walt Disney resort 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 proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 dry cleaning machine. The machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine. The new machine is a closed loop design, i.e., it has no stack or discrete emissions points. Air emissions are expected to occur only as a result of fugitive emissions.

The new machine is considered a "4th generation" dry cleaning machine that utilizes a carbon adsorber and refrigerated condenser to reclaim perchloroethylene (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 is disposed of as still bottom residue. No PCE will be emitted except as fugitive emissions, which will be minimized by following EPA-prescribed leak detection and repair procedures.

The application was received on May 9, 2007, and deemed complete on that date. Day 90 is August 7, 2007.

I recommend your signature and forwarding to Patty for clerking.

In the Matter of an Application for Permit by:

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

Authorized Representative: Mr. Lee Schmudde

DEP File No. 0950111-028-AC Walt Disney World Resort Complex Dry Cleaning Machine Orange and Osceola Counties, Florida

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit for the proposed project as detailed in the application specified above and the enclosed Technical Evaluation and Preliminary Determination for the reasons stated below.

Walt Disney World Company applied on May 9, 2007, to the Department for a permit to install a dry cleaning machine for its facility in Lake Buena Vista, Orange and Osceola Counties.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. Department has determined that an air construction permit is required.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. 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. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/921-9533). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5) & (9), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of the enclosed Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public



Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

June 7, 2007

Electronically sent – Received Receipt requested.

Mr. Lee Schmudde, Authorized Representative Walt Disney World Company P.O. Box 10,000 Lake Buena Vista, FL 32830-1000

Re: DEP File No. 0950111-028-AC
Walt Disney World Resort Complex

Dear Mr. Schmudde:

Enclosed is one copy of the Draft Air Construction Permit to add a new dry cleaning machine at the Walt Disney World Resort Complex in Lake Buena Vista, Orange and Osceola Counties. The Department's Intent to Issue Air Construction Permit, the Technical Evaluation and Preliminary Determination, and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, such as a newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A.A. Linero, Program Administrator, at the letterhead address. If you have any questions regarding this matter, please contact Tom Cascio at (850) 921-9526 or Mr. Linero at (850) 921-9523.

Sincerely,

Trina L. Vielhauer, Chief Bureau of Air Regulation

Zum & Wilhaus

TLV/aal/tbc

Enclosures

DEP File No. 0950111-028-AC Walt Disney World Company Page 2 of 3

inspection. If comments received result in a change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit 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 14 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), however, any person who asked the Department 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 (in a proceeding initiated by another party) 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 when and how the petitioner received notice of the agency decision; (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; 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 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 application 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.

DEP File No. 0950111-028-AC Walt Disney World Company Page 3 of 3

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief Bureau of Air Regulation

Zeens Vielsaus

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice, Technical Evaluation, and the Draft permit) and all copies were sent electronically (with Received Receipt) before the close of business on 6/1/0/1 to the persons listed:

Lee Schmudde, Walt Disney World Company: lee.schmudde@disney.com

Richard A. Bumar, Jr., P.E., Walt Disney World Company: rich.bumar@disney.com

Jim Bradner, Central District Office: james.bradner@dep.state.fl.us

Katy Forney, EPA Region 4: <u>forney.kathleen@epa.gov</u> James Little, EPA Region 4: <u>little.james@epa.gov</u>

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,

on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0950111-028-AC

Walt Disney World Resort Complex
Dry Cleaning Machine
Orange and Osceola Counties

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Walt Disney World Company to install a dry cleaning machine at its facility in Orange and Osceola Counties. A review under the rules for the Prevention of Significant Deterioration of Air Quality (PSD) and a determination of best available control technology (BACT) were not required. The applicant's name and address are Walt Disney World Company, P.O. Box 10,000, Lake Buena Vista, Florida 32830-1000.

This Walt Disney resort 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 proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 dry cleaning machine. The machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine. 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.

The new machine is considered a "4th generation" dry cleaning machine which will utilize a carbon adsorber and refrigerated condenser to reclaim perchloroethylene (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 residue. No PCE will be emitted except as fugitive emissions, which will be minimized by following EPA-prescribed leak detection and repair procedures.

The Department will issue the Final Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action for a period of 14 days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 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 the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 of the Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision 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 permit applicant or any of the parties listed below must be filed within 14 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 14 days of publication of the public notice or within 14 days of receipt of this notice of intent, 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 14 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 in a proceeding initiated by another party will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (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'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 decision; (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; 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 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 application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

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:

Department of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114

Fax: 850/921-9533

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 permit application, draft air construction permit, technical evaluation, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project, Tom Cascio at MS 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or Tom.Cascio@dep.state.fl.us, or call 850/921-9526 for additional information. Key documents may also be viewed at: www.dep.state.fl.us/Air/permitting/construction.htm and clicking on Walt Disney Resort Complex.



Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

P.E. Certification Statement

Applicant:

Walt Disney World Company Walt Disney World Resort Complex

Project Type: Air Construction Permit

Dry Cleaner Machine Replacement

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 62-4 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

Professional Engineer (P.E.) License Number 48866

Permitting Authority:

Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4 Tallahassee, Florida 32301

Project No.: 0950111-028-AV

Telephone: 850/921-9532

Fax: 850/921-9533

SMS/tbc

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Walt Disney World Company
Walt Disney World Resort Complex
Columbia T.D. Mach 2 Dry Cleaning Machine
Orange and Osceola Counties

DEP File No. 0950111-028-AC



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

June 7, 2007

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

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

Authorized Representative:

Mr. Lee Schmudde, Authorized Representative

Processing Schedule

05/09/07: Received application to construct. ##/##/##: Distributed Intent to Issue Permit.

Facility Description and Location

This Walt Disney resort 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. 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.



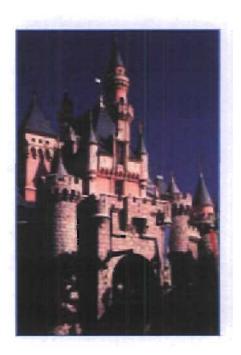


Figure 1. Map of Site Location and Photograph from the Walt Disney Resort Complex.

Major Regulatory Categories

The key regulatory provisions applicable to the facility are:

Title I, Part C, Clean Air Act (CAA): The facility is located in an area that is designated as "attainment", "maintenance", or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard (NAAQS). Potential emissions of at least one regulated pollutant exceed 100 tons per year, therefore the facility is classified as a "major stationary source" of air pollution with respect to Rule 62-212.400, Florida Administrative Code (F.A.C.), Prevention of Significant Deterioration of Air Quality.

Title I, Section 111, CAA: The combined cycle combustion turbine with a natural gas-fired heat recovery steam generator 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; PSD-FL-014/014(A)/123, Prevention of Significant Deterioration (PSD), in Rule 62-212.400, F.A.C.

Title I, Section 112, CAA: The facility is a "Major Source" of hazardous air pollutants (HAPs). The new dry cleaning machine is regulated under NESHAP – 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

Title V, CAA: The facility is a Title V or "Major Source of Air Pollution" in accordance with Chapter 62-213, F.A.C., because the potential emissions of at least one regulated pollutant exceed 100 tons per year. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC). The facility's current Title V Air Operation Permit is 0950111-027-AV.

CAIR: The facility is subject to the Federal Clean Air Interstate Rule (CAIR) in accordance with the Final Department Rules issued pursuant to CAIR as implemented by FDEP in Rule 62-296.470, Florida Administrative Code (FAC).

Proposed Project

The proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 dry cleaning machine (see photograph below). The machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine, which is listed in the facility's current Title V Air Operation Permit 0950111-027-AV as emissions unit 1 (EU 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.

The new machine is considered a "4th generation" dry cleaning machine which will utilize a carbon adsorber and refrigerated condenser to reclaim perchloroethylene (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 residue. 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 (OAPQS) 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 (*Perchloroethylene Dry Cleaners Refined Human Health Risk Characterization*, Neal Fann, Risk and Exposure Assessment Group, OAQPS, November, 2005). At the maximum production rate for this machine (twenty-four 160-pound loads per day), maximum expected PCE fugitive emissions will be approximately 6 pounds per year.

0.00 3 4

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.



Figure 2. Photograph of a Columbia T.D. Mach 2 80-80 dry cleaning machine.

2. EFFECTS ON EMISSIONS

Applicant's basic analysis

It is expected that implementing the proposed project will have a minimal effect on the PCE emissions from the facility, and the removal of the existing dry cleaning machine will reduce PCE emissions. No effect on other pollutant emissions is expected.

The Applicant estimated that the maximum PTE of PCE from the new machine (exclusively fugitive emissions) is *only 6 pounds per year*. This figure is derived by multiplying the 0.0085 pounds of PCE per ton of clothes emissions factor times 160 pounds of clothes per load by 24 loads per day times 365 days per year, as noted below:

| Γ | 0.0085 | 160 | 24 | 365 | 5.96 |
|---|--------|-----|----|-----|------|
| | | | | | |

3. REGULATIONS THAT APPLY TO THE PROJECT

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the F.A.C. This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code. These include: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and BACT); 62-213 (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures).

Walt Disney World Company Dry Cleaning Machine

4. DETERMINATION WHETHER PROJECT IS A (NON-MAJOR) MODIFICATION

Per Rule 62-210.200(203), F.A.C., a modification is defined as follows:

"Modification" – Any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Act, including any not previously emitted, from any emissions unit or facility.

- (a) A physical change or change in the method of operation shall not include:
 - 1. Routine maintenance, repair, or replacement of component parts of an emissions unit; or
 - 2. A change in ownership of an emissions unit or facility.
- (b) & (c) (Not relevant in this analysis)

The installation of the dry cleaning machine is a physical change that involves additional components. It is not <u>routine</u> maintenance, repair or replacement of component parts of an emissions unit. If increases in actual emissions accompany the physical change, then the project constitutes a modification.

Per Rule 62-210.200(11), F.A.C., actual emissions are defined as follows:

- "Actual Emissions" The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:
- (a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department shall allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

Actual emissions are calculated as reported in the Department's Annual Operating Reports in tons per year (TPY) as noted below (data were available for only the last two years):

| Year | PCE |
|------|-------|
| | TPY |
| 2004 | 0.138 |
| 2005 | 0.201 |

The Department assumed the most recent reported annual emissions are adequate for this portion of the review.

The following table is a comparison of past actual emissions from the Dry Cleaning System preceding the planned Dry Cleaning Machine project, and the potential emissions of the new system.

| Pollutant | Actual Emissions 2004-2005 tons per year | Potential Emissions tons per year (new system) | Calculated Increase tons per year |
|---------------------|---------------------------------------------|------------------------------------------------------|-----------------------------------|
| PM/PM ₁₀ | .170 | .003 | 167 |

Based on the foregoing analysis, the Dry Cleaning Machine project constitutes a (non-major) modification with respect to the Department's rules and requires a construction permit.

5. OTHER APPLICABLE REGULATIONS

The requirements already listed in the facility's existing Title V Air Operation Permit No. 0950111-027-AV are comprehensive and sufficient for the future operation of the facility. The main additional requirement is for an air construction permit pursuant to Rules 62-4, 62-210 and 62-212.300, F.A.C., to proceed with the project. The permit will include testing and recordkeeping conditions demonstrating that the project complies with the specified emissions standards of NESHAP – 40 CFR 63, Subpart M.

PERMITTEE

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

Authorized Representative:

Mr. Lee Schmudde, Authorized Representative

Air Permit No. 0950111-028-AC Facility ID No. 0950111 SIC No. 7996 Dry Cleaning Machine

Permit Expires: December 31, 2008

PROJECT AND LOCATION

This permit authorizes installation of a new dry cleaning machine at the Walt Disney World Resort Complex (the facility). This machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine. The facility is located in both Orange and Osceola Counties, at 1375 Buena Vista Drive in Lake Buena Vista, Florida.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Parts 60 and 63 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

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Section 2. Administrative Requirements

Section 3. Emissions Units Specific Conditions

Section 4. Appendices

| Joseph Kahn, Director Division of Air Resource Management | (Date) | |
|-----------------------------------------------------------|--------|--|

FACILITY AND PROJECT DESCRIPTION

This Walt Disney resort 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 proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 dry cleaning machine. The machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine, which is listed in the facility's current Title V Air Operation Permit 0950111-027-AV as emissions unit 1 (EU 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.

The new machine is considered a "4th generation" dry cleaning machine which will utilize a carbon adsorber and refrigerated condenser to reclaim perchloroethylene (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 residue. 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 (OAPQS) 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 (*Perchloroethylene Dry Cleaners Refined Human Health Risk Characterization*, Neal Fann, Risk and Exposure Assessment Group, OAQPS, November, 2005). At the maximum production rate for this machine (twenty-four 160-pound loads per day), maximum expected PCE fugitive emissions will be approximately 6 pounds per year.

| ID | Emission Unit Description | |
|-----|---------------------------|--|
| 121 | Dry Cleaning Machine | |

REGULATORY CLASSIFICATION

<u>Title I, Section 1.12, CAA</u>: The facility is a "Major Source" of hazardous air pollutants (HAPs). The new dry cleaning machine is regulated under NESHAP – 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

<u>Title IV</u>. The facility operates existing units subject to the Acid Rain provisions of the Clean Air Act (CAA).

<u>Title V</u>: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major stationary source in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to New Source Performance Standards (NSPS) in 40 CFR 60 including:

- 40 CFR 60, Subpart A General Provisions.
- 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and 40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978).

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR).

RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete, and the Department's Technical Evaluation and Preliminary Determination.



- 1. <u>Permitting Authority</u>: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.
- 2. <u>Compliance Authority</u>: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office. The mailing address and phone number of the Central District Office is: 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803; Telephone: 407/894-7555; Fax: 407/897-5963.
- 3. <u>Appendices</u>: The following Appendices are attached as part of this permit: Appendix GC (General Conditions); and Appendix C (Common State Regulatory Requirements).
- 4. <u>Applicable Regulations, Forms and Application Procedures</u>: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
- 5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
- 6. <u>Modifications</u>: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
- 7. <u>Title V Permit</u>: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Bureau of Air Regulation with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

This section of the permit addresses the following emissions unit.

AIR RESOURCE MANAGEMENT SYSTEM (ARMS) Emissions Unit 121

The proposed construction involves the installation and operation of a Columbia T.D. Mach 2 80-80 dry cleaning machine. The machine will replace the currently permitted Multimatic Atlas 45 dry cleaning machine, which is listed in the facility's current Title V Air Operation Permit 0950111-027-AV as emissions unit 1 (EU 001). The new machine is a closed loop design, i.e., there are no stack emissions or other discrete emissions points. Air emissions are expected to occur only as a result of fugitive emissions.

{Permitting Note: The following rule applies 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.}

{Permitting Note: The unit remains subject to the applicable requirements of current Title V Air Operation Permit No. 0950111-027-AV.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits. The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of these permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. [Rule 62-4.070, F.A.C.]

EQUIPMENT AND PERFORMANCE RESTRICTIONS

2. Dry Cleaning Machine. This permit authorizes the construction activities necessary to add a new dry cleaning machine, considered "4th generation" technology, which utilizes a carbon adsorber and refrigerated condenser to reclaim perchloroethylene (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 is disposed of as still bottom residue. No PCE is emitted except as fugitive emissions, which is minimized by following EPA prescribed leak detection and repair procedures. [Applicant request.]

STANDARDS

- 3. The following specific conditions are from NESHAP 40 CFR 63.322 and the original numbering is maintained:
 - (a) [Not 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.
- (h) [Not applicable.]
- (i) [Not applicable.]
- (j) [Not applicable.]
- (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.
- (l) [Not applicable.]
- (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:
 - (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.
 - (ii) [Not applicable.]
 - (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 nonvented 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.

[40 CFR 63.322]

TEST METHODS AND MONITORING

- 4. The following specific conditions are from NESHAP 40 CFR 63.323 and the original numbering is maintained:
 - (a) When a refrigerated condenser is used to comply with § 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 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.
 - (b) [Not applicable.]

- (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.

[40 CFR 63.323]

REPORTING AND RECORDKEEPING REQUIREMENTS

- 5. The following specific conditions are from NESHAP 40 CFR 63.324 and the original numbering is maintained:
 - (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 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.

[40 CFR 63.324]

- 6. Construction Notifications. Within 15 days of beginning construction, the permittee shall notify the Compliance Authority that construction has commenced. Within 15 days of completing construction, the permittee shall notify the Compliance Authority that construction has concluded. Each notification shall include an updated proposed schedule of activities through the initial shakedown period and initial testing.

 [Rule 62-4.070(3), F.A.C.]
- 7. <u>Test Reports.</u> The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in the facility's current Title V Air Operation Permit. [Rule 62-297.310(8), F.A.C.]



SECTION 4. APPENDIX C

COMMON STATE REGULATORY REQUIREMENTS

{Permitting Note: Unless otherwise specified by permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

- 1. <u>Plant Operation Problems</u>: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
- 2. <u>Circumvention</u>: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
- 3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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.]
- 4. <u>Excess Emissions Prohibited</u>: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- 5. Excess Emissions Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program 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.]
- 6. <u>VOC or OS Emissions</u>: No person shall 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. [Rule 62-296.320(1), F.A.C.]
- 7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(217), F.A.C.]
- 8. <u>General Visible Emissions</u>: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
- 9. <u>Unconfined Particulate Emissions</u>: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. 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 two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

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- 11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the 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. [Rule 62-297.310(2), F.A.C.]
- 12. <u>Calculation of Emission Rate</u>: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
- 13. <u>Test Procedures</u>: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. Required Sampling Time. 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. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

14. 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.]

- 15. <u>Sampling Facilities</u>: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
- 16. <u>Test Notification</u>: 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. [Rule 62-297.310(7)(a)9, F.A.C.]
- 17. 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 shall 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. [Rule 62-297.310(7)(b), F.A.C.]
- 18. <u>Test Reports</u>: 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. 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. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to

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COMMON STATE REGULATORY REQUIREMENTS

determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP 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.]

RECORDS AND REPORTS

- 19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
- 20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

General Permit Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

- 1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

General Permit Conditions

- arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed:
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



RECEIVED

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 $_{\rm M\Delta Y}~0.9~2007$ APPLICATION FOR AIR PERMIT - LONG FORM

BUREAU OF AIR REGULATION

I. APPLICATION INFORMATION

3. PSD Number (if applicable):

4. Siting Number (if applicable):

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:

Identification of Facility

- 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.

| 14 | Identification of Automot | | | | |
|-----------|-------------------------------------------------------------|----------------|----------------------------|--|--|
| 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: C |)range | Zip Code: 32830 | | |
| 5. | Relocatable Facility? | 6. Existing Ti | itle V Permitted Facility? | | |
| | Yes x No | x Yes | ☐ No | | |
| <u>Ar</u> | oplication Contact | | | | |
| 1. | Application Contact Name: Richard A. Bun | nar, 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 Sta | ate: FL | Zip Code: 32830 | | |
| 3. | 3. Application Contact Telephone Numbers | | | | |
| | Telephone: (407) 824-7129 ext. | Fax: (407) | 824-7455 | | |
| 4. | 4. Application Contact Email Address: rich.bumar@disney.com | | | | |
| Ar | Application Processing Information (DEP Use) | | | | |

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

Effective: 2/2/06

1. Date of Receipt of Application: 5-9-07

2. Project Number(s): 095 0111 -028-AC

Purpose of Application

| This application for air permit is submitted to obtain: (Check one) |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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. |
| |

DEP Form No. 62-210.900(1) - Form Effective: 2/2/06

2

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 | AC1F | N/A |
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| Check one: Attached - Amount: \$ | Not Applicable |
|----------------------------------|----------------|

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

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.

4

Signature

Data

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

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 |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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. |
| 1 | <u> </u> |
| | Signature Date |

5

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

| Pro | fessional 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, 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 and schedule is submitted with this application. |
| | (4) If the purpose of this application is to obtain an air construction permit (check here $\boxed{\times}$, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here $\boxed{}$, 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 contained in such permit. |
| .' | Signature Date |

* Attach any exception to certification statement.

DEP Form No. 62-210,900(1) - Form

Effective: 2/2/969 19 66

A. GENERAL FACILITY INFORMATION

Facility Location and Type

| 1. | . Facility UTM Coordinates Zone East (km) 449.70 North (km) 3138.00 | | 2. Facility Latitude/Longitude Latitude (DD/MM/SS) Longitude (DD/MM/SS) | | | |
|----|---------------------------------------------------------------------|--------------------|-------------------------------------------------------------------------|----------------|----|-----------------|
| 3. | Governmental | 4. Facility Status | 3. | Governmental | 4. | Facility Status |
| | Facility Code: | Code: | | Facility Code: | | Code: |
| | 0 | A | | 0 | | A |
| 7. | 7. Facility Comment: | | | | | |
| | | | | | | |
| | | | | | | |
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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."

| <i>J</i> 1 <i>J</i> 1 | | | | | |
|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility Primary Respons | ible Offici | al Name: | - | | |
| Facility Primary Respons Organization/Firm: Street Address: | ible Offici | al Mailing | Address | | |
| City: | | State: | | Zip Code: | |
| Facility Primary Respons | ible Offici | al Telephor | ne Numbers | | |
| Telephone: () - | ext. | Fax: () | - | | |
| Facility Primary Respons | ible Offici | al Email A | ddress: | | |
| | Facility Primary Respons Organization/Firm: Street Address: City: Facility Primary Respons Telephone: () - | Facility Primary Responsible Offici Organization/Firm: Street Address: City: Facility Primary Responsible Offici Telephone: () - ext. | Organization/Firm: Street Address: City: State: Facility Primary Responsible Official Telephor Telephone: () - ext. Fax: () | Facility Primary Responsible Official Mailing Address Organization/Firm: Street Address: City: State: Facility Primary Responsible Official Telephone Numbers | Facility Primary Responsible Official Mailing Address Organization/Firm: Street Address: City: State: Zip Code: Facility Primary Responsible Official Telephone Numbers Telephone: () - ext. Fax: () - |

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

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

List of Pollutants Emitted by Facility

| 1. Pollutant Emitted | 2. Pollutant Classification | 3. Emissions Cap [Y or N]? |
|----------------------|-----------------------------|----------------------------|
| N/A | | [2 0221] |
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DEP Form No. 62-210.900(1) - Form

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 | | | | | |
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| 7. Facility-Wi | ide or Multi-Un | it Emissions Cap C | omment: | | |
| | | | | | |

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

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: |
| Ad | 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 |
| | 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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DEP Form No. 62-210.900(1) - Form

Additional Requirements for FESOP Applications

| 1. | List 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) |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Add | ditional Requirements for Title V Air Operation Permit Applications |
| 1. | List of Insignificant Activities (Required for initial/renewal applications only): Attached, Document ID: Not Applicable (revision application) |
| | Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): Attached, Document ID: Not Applicable (revision application with no change in applicable requirements) |
| [| Compliance Report and Plan (Required for all initial/revision/renewal applications): Attached, Document ID: Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing. |
| | List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only): Attached, Document ID: Equipment/Activities On site but Not Required to be Individually Listed Not Applicable |
| | Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only): |
| | Attached, Document ID: Not Applicable |
| 6. | Requested Changes to Current Title V Air Operation Permit: Attached, Document ID: Not Applicable |
| Add | ditional Requirements Comment |
| and | ase see the Walt Disney World Title V permit (0950111-027-AV) for a listing of exempt insignificant activities/emissions units at this facility. The most recent compliance report is submitted to the FDEP on February 28 and all emissions units were in compliance. |

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EMISSIONS UNIT INFORMATION 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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EMISSIONS UNIT INFORMATION

Section [1]

of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

| 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. | | | | |
| En | | Description and Sta | <u>ıtus</u> | | |
| 1. | Type of Emis | ssions Unit Addresse | d in this Section | on: (Check one) | |
| | process o | | activity, which | dresses, as a single em n produces one or mor int (stack or vent). | - |
| | This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. | | | | |
| | | | | dresses, as a single em ies which produce fug | |
| 2. | Description of Emissions Unit Addressed in this Section: One Columbia T.D. Mach 2 80-80 drycleaning machine | | | | |
| 3. | Emissions U | nit Identification Nu | mber: Unknov | vn | |
| 4. | Emissions Unit Status Code: C | 5. Commence Construction Date: 5/20/07 | 6. Initial Startup Date: 5/27/07 | 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. Emissions Unit Comment: This emissions unit will replace the existing perchloroethylene drycleaning machine, E.U 001, permit 09501110027-AV. | | | | | |

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EMISSIONS UNIT INFORMATION Section [1] of [1]

Emissions Unit Control Equipment

| 1. Control Equipment/Mathed(a) 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. |
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| 2. Control Device or Method Code(s): 048, 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

| 1. Maximum Process or Throughput Rate: 1 160-pound load/hour | | | | | |
|--------------------------------------------------------------|--------------------------------------------------------------------------------|-----------------|--|--|--|
| 2. Maximum Production Rate: 24 loads/day | | | | | |
| 3. Maximum Heat Input Rate: N/A million Btu/hr | | | | | |
| 4. Maximum Incineration I | Rate: N/A pounds/hr | | | | |
| | N/A tons/day | | | | |
| 5. Requested Maximum Op | perating Schedule: | | | | |
| | 24 hours/day | 7 days/week | | | |
| | 52 weeks/year | 8760 hours/year | | | |
| 1 | ut rate is in terms of the number of ess two loads of 80 pounds each per load. | | | | |

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EMISSIONS UNIT INFORMATION Section [1] [1] of

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

Emission Point Description and Type

| 1. | Identification of Point on I | | 2. Emission Point | Type Code: | |
|-------------------------------------|-----------------------------------------------------------------------------------------|---------------------------------------|-----------------------|----------------------------|--|
| | Flow Diagram: See Attac | hment A | 4 | | |
| 3. | Descriptions of Emission | Points Comprising | g this Emissions Unit | for VE Tracking: | |
| | | | | | |
| N/. | A | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 4. | 4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A | | | | |
| | | | | | |
| 5. | Discharge Type Code: F | Stack Height feet | :: N/A | 7. Exit Diameter: N/A feet | |
| 8. | Exit Temperature: | | netric Flow Rate: | 10. Water Vapor: N/A | |
| | 77 °F | N/A acfm | Albara Francisco | % | |
| 11. Maximum Dry Standard Flow Rate: | | 12. Nonstack Emission Point Height: 0 | | | |
| | N/A dscfm | | feet | | |
| 13. | Emission Point UTM Coo | rdinates | 14. Emission Point I | Latitude/Longitude | |
| | Zone: East (km): | | Latitude (DD/M) | M/SS) N28°25'37" | |
| | North (km) | : | Longitude (DD/I | MM/SS) W81°34'30" | |
| 15. | Emission Point Comment: | | | | |
| L ID | | | | | |
| Fu | gitive emissions only | | | | |
| | | | | | |
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EMISSIONS UNIT INFORMATION

Section [1]

of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type):

| 2. Source Classification Code (SCC): 2420010055 4. Maximum Hourly Rate: 6.8e-4 7. Maximum % Sulfur: N/A 10. Segment Description and Rate: Segment _ of Segment Description (Process/Fuel Type): | Fugitive emissions from an industrial/commercial perchloroethylene dry cleaning operation | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|--|--|--|--|--|
| 6.8e-4 6.0 Factor: N/A 7. Maximum % Sulfur: N/A 8. Maximum % Ash: N/A 10. Segment Comment: Segment Description and Rate: Segment _ of | | | | | | |
| N/A N/A N/A 10. Segment Comment: Segment Description and Rate: Segment of | vity | | | | | |
| Segment Description and Rate: Segment _ of | Jnit: | | | | | |
| | | | | | | |
| | | | | | | |
| 1. Segment Description (Process/Fuel Type): | | | | | | |
| 1. Segment Description (Process/Fuel Type): | | | | | | |
| 2. Source Classification Code (SCC): 3. SCC Units: | | | | | | |
| 4. Maximum Hourly Rate: 5. Maximum Annual Rate: 6. Estimated Annual Act Factor: | vity | | | | | |
| 7. Maximum % Sulfur: 8. Maximum % Ash: 9. Million Btu per SCC U | Jnit: | | | | | |
| 10. Segment Comment: | | | | | | |

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EMISSIONS UNIT INFORMATION

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.

| Pollutant Emitted: Perchloroethylene | 2. Total Percent Efficiency of Control: 100% |
|-----------------------------------------------------------------------------------------------|-------------------------------------------------|
| 3. Potential Emissions: 0 lb/hour | 4. Synthetically Limited? 1 tons/year Yes X No |
| 5. Range of Estimated Fugitive Emissions (as 0 to 0.003 tons/year | s applicable): |
| 6. Emission Factor: | 7. Emissions Method Code: |
| Reference: | |
| 8.a. Baseline Actual Emissions (if required): | 8.b. Baseline 24-month Period: |
| N/A tons/year | From: To: |
| 9.a. Projected Actual Emissions (if required): | 9.b. Projected Monitoring Period: |
| 0 tons/year | 5 years 10 years |
| 10. Calculation of Emissions: See Attachment F | |
| 11. Potential, Fugitive, and Actual Emissions C PTE is zero; there is no emissions stack on t | |

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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 1 1 | 1 mowable Emissions 1 mowable Emissions 1 of | <u> </u> | |
|-------|----------------------------------------------|----------|-----------------------------------------------|
| 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: | | |
| ٠. | nation of compliance. | | |
| | | | |
| 6 | Allowable Emissions Comment (Description | of (| Operating Method): |
| 0. | N/A | | p p c c c c c c c c c c c c c c c c c c |
| | | | |
| | | | |
| 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: | | • |
| ٦. | Method of Comphanice. | | |
| | | | |
| - | Allowable Emissions Comment (Description | of (| Omenatine Method) |
| ο. | Allowable Emissions Comment (Description | 01 (| 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: | <u> </u> | |
| ٥. | vication of compliance. | | |
| | | | |
| 6 | Allowable Emissions Comment (Description | of (| Practing Method): |
| υ. | Anowable Emissions Comment (Description | OI (| operating Method). |
| | | | |
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EMISSIONS UNIT INFORMATION 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 Subtype: | 2. Basis for Allowable Rule | Opacity: Other |
|----|--------------------------------------------|-----------------------------|-----------------|
| 3. | Allowable Opacity: | | |
| | Normal Conditions: % Ex | ceptional Conditions: | % |
| | Maximum Period of Excess Opacity Allowe | ed: | min/hour |
| 4. | Method of Compliance: | | |
| | | | |
| _ | Visible Emissions Comment: N/A | | |
| 5. | Visible Emissions Comment: N/A | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Vi | sible Emissions Limitation: Visible Emissi | ons Limitation of | |
| 1. | Visible Emissions Subtype: | 2. Basis for Allowable | Opacity: |
| | | Rule | Other |
| 3. | Allowable Opacity: | | |
| | | cceptional Conditions: | % |
| | Maximum Period of Excess Opacity Allowe | ed: | min/hour |
| 4. | Method of Compliance: | | |
| | | | |
| 5. | Visible Emissions Comment: 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.

<u>Continuous Monitoring System:</u> Continuous Monitor <u>1</u> of <u>1</u>

| 1. | Parameter Code: | 2. | Pollutant(s): |
|----|----------------------------------------|-----|-----------------------------------------|
| 3. | CMS Requirement: | | Rule Other |
| 4. | Manufacturer: | | |
| | Model Number: | | Serial Number: |
| 5. | Installation Date: | 6. | Performance Specification Test Date: |
| 7. | Continuous Monitor Comment: N/A | | |
| Co | ntinuous Monitoring System: Continuous | Mon | itor of |
| 1. | Parameter Code: | | 2. Pollutant(s): |
| 3. | CMS Requirement: | | Rule Other |
| 4. | Monitor Information Manufacturer: | | |
| | Model Number: | | Serial Number: |
| 5. | Installation Date: | | 6. Performance Specification Test Date: |
| 7. | Continuous Monitor Comment: N/A | 1 | |

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EMISSIONS UNIT INFORMATION

[1]

Section [1] of

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 ID: 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 |
| 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: \textbf{x} Not Applicable |

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EMISSIONS UNIT INFORMATION

Section [1]

of [1]

| Additional Requ | irements for A | Air Construction | Permit Applications |
|-----------------|----------------|------------------|---------------------|
| | | | |

| 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 | 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 samp | ling | | | |
| facilities only) | | | | |
| ☐ Attached, Document ID: Not Applicable | | | | |
| Additional Requirements for Title V Air Operation Permit Applications | | | | |
| 1. Identification of Applicable Requirements | | | | |
| Attached, Document ID: | | | | |
| 2. Compliance Assurance Monitoring | | | | |
| Attached, Document ID: x 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.) | | | | |
| 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: | | | | |
| Not Applicable | | | | |

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N/A

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PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

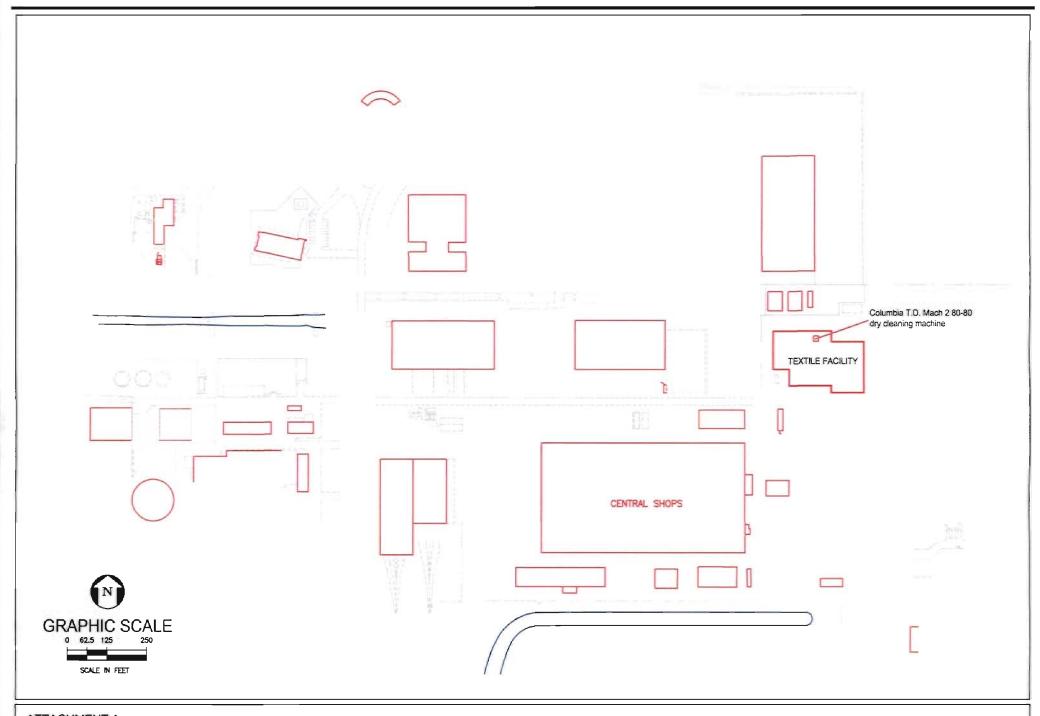
During operations, the following techniques will be used to prevent unconfined particulate matter emissions on an as needed basis:

- 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

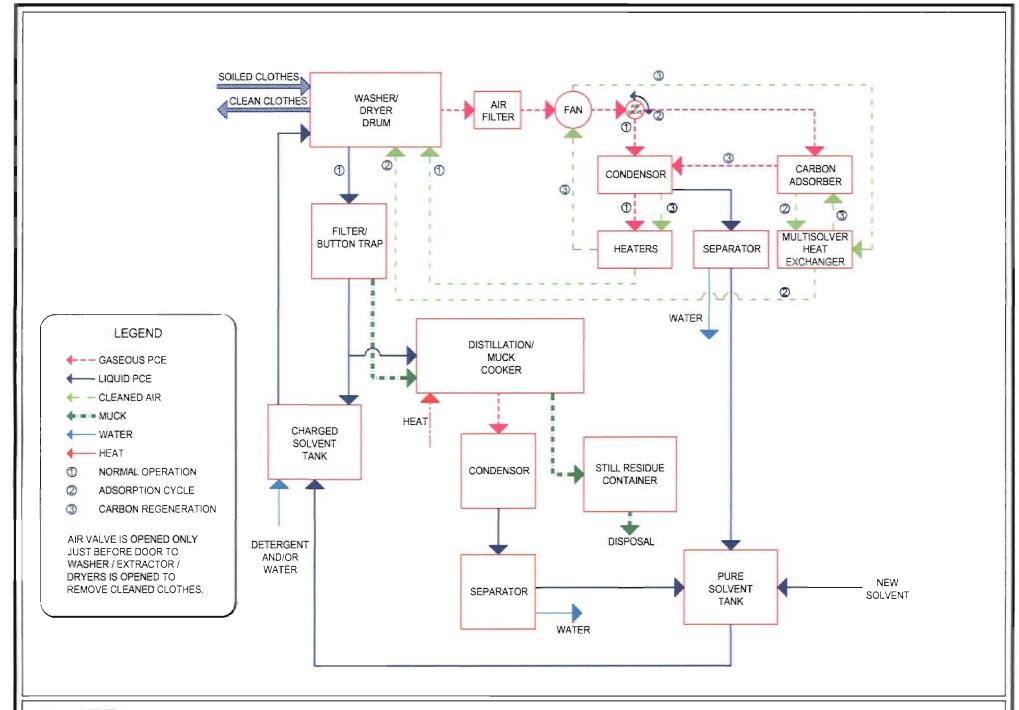
DESCRIPTION OF PROPOSED CONSTRUCTION

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.

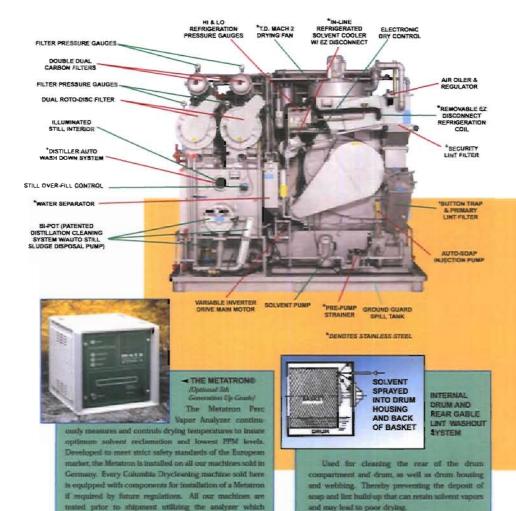
Please refer to the following pages for technical drawings of the machines and a sales brochure describing the machine features.



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



T.D. Mach 2 4th Generation • Perc

Long Cycle Times Have **Officially** Been Eliminated!

"QUICK DRY" SERIES

TO MUCH 2 80 RS

The fastest, most innovative drycleaning process ever developed! The durable T.D. Mach 2 is designed to increase output by decreasing total cycle times.

TD MACH 2.80

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



All Information is factual at time of printing.



This system is operated automatically during

every wash program of the IL-2 computer.

and may lead to poor drying.

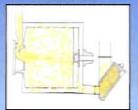
231 EDISON AVENUE, WEST BABYLON, NEW YORK, 11704 - 800-446-5634 - IN NEW YORK (631) 293-7571 - FAX (631) 293-7863 www.drycleaningmachine.com Columbia / ILSA 7/03

COLUMBIA

assures that Columbia machines will meet and exceed the

requirements of federal, state and local regulation.

"QUICK DRY" SERIES



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.



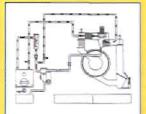
PRE-PUMP STRAINER

Pre-pump strainer keeps plns and other debris from clogging the pump. Protects pump seal from deteriorating for longer service life and less chance of down time.



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 IL-2 computer, the operator can reduce solvent concentration in the distiller waste stream. Hot air from the heat pump and steam boost coll 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.



INLINE SOLVENT COOLER

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 coll, servicing is simple. (See E-Z Access Self-Sealed Refrigeration Coils)



IL-2 COMPUTER

西西西苏西西西

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

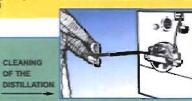
Other features include a self-powered clock, cycle and working hour counters.

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.



Features

- Available in 40, 50, 55, 65.
 Door Locks & Safety 80, 120 and 160 lb. Capacities
- · Ground Guard Solvent Spill Retention tank
- 100% Air Flow Button Trap Drying System
- 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.
- 3 Automatic Self-cleaning Tanks
- Programmable Soap Injector
- · Dual Adjustable Level Controls
- · Patented "Quick-Dry" Air Circulation System for Complete Drying



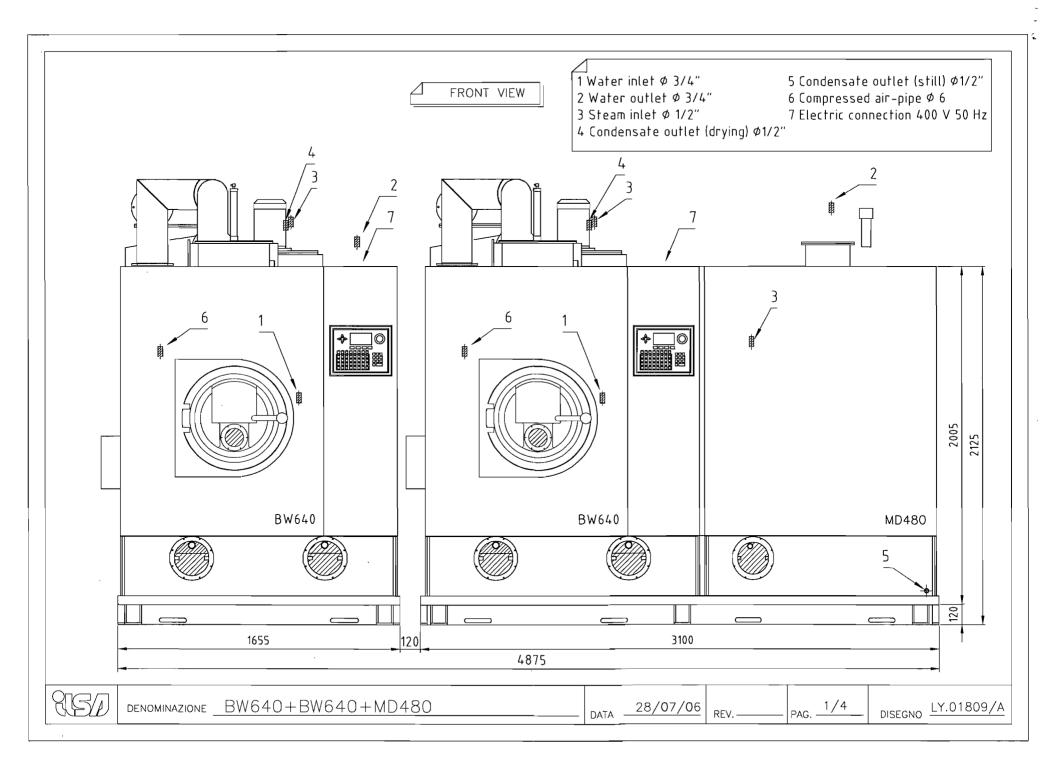
A parented emission-free system efficiently cleans the still without opening the cleaning door.

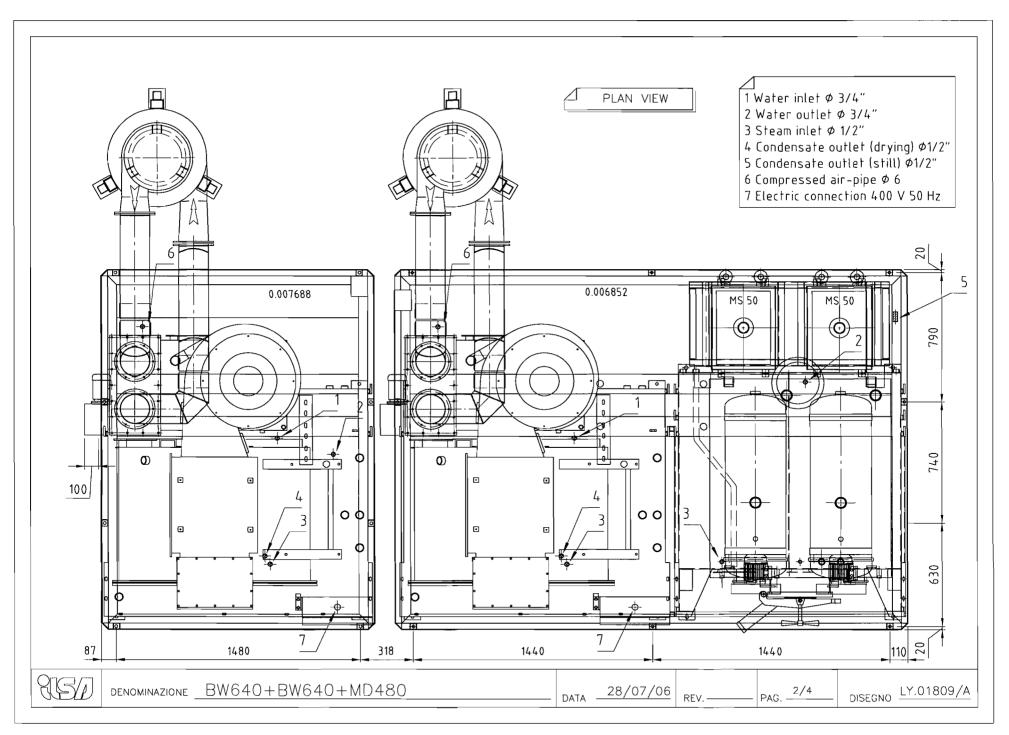
CLEANING

OF THE

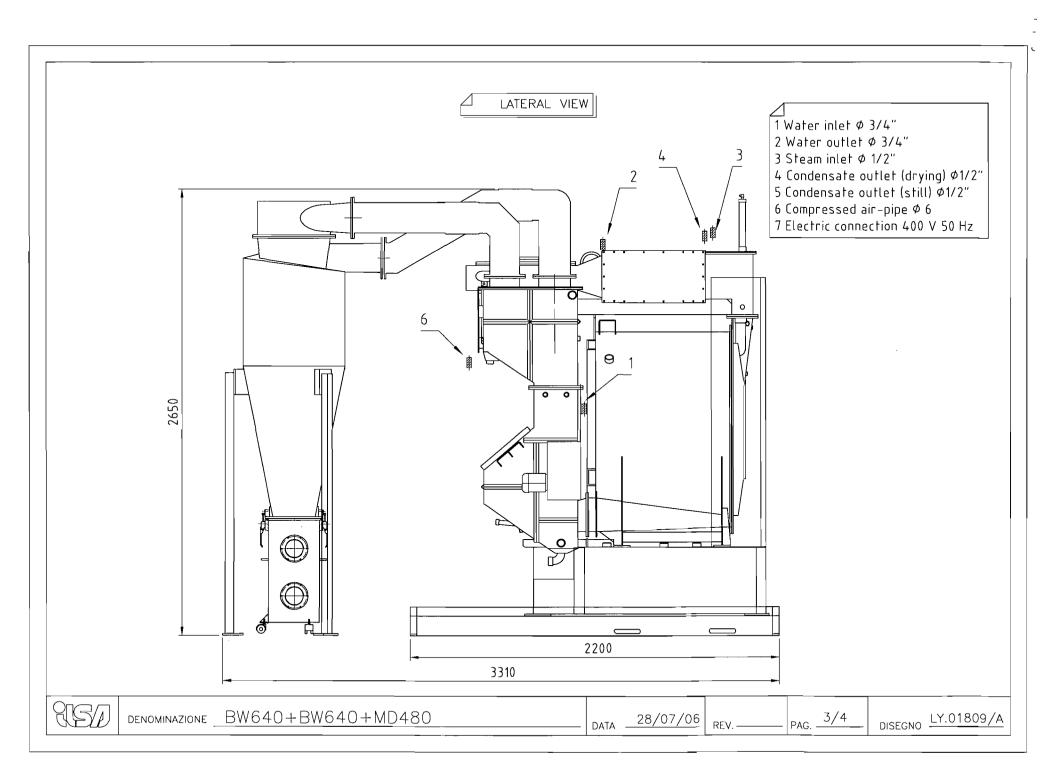
The automatic still cleanout features a freemoving rake and a piston type sludge pump. A 11/4" pipe for sludge removal and an air displacement pipe is provided for the return of contaminated air from your hazardous waste drum. For the operator's safety and for the safety of the environment, this is a closed system.

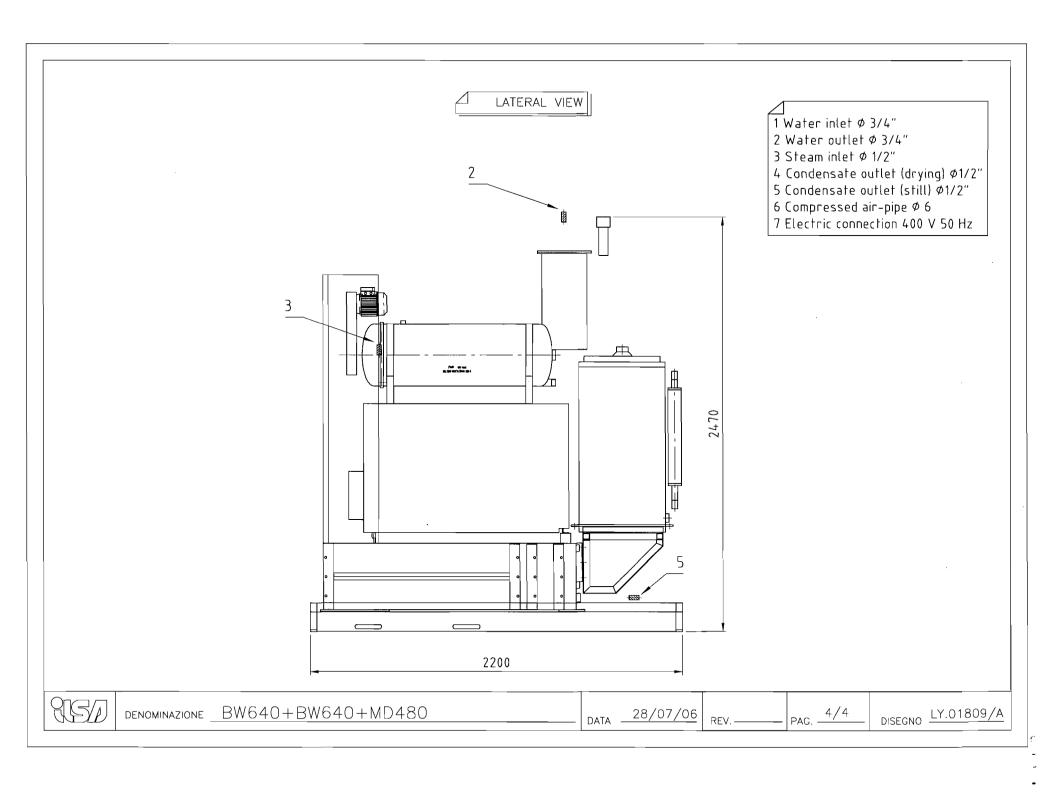






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RULE APPLICABILITY ANALYSIS

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:
 - (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 § 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 airperchloroethylene 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 $0 \, ^{\circ}\text{C} \, (32 \, ^{\circ}\text{F})$ to $48.9 \, ^{\circ}\text{C} \, (120 \, ^{\circ}\text{F})$ to an accuracy of $\pm 1.1 \, ^{\circ}\text{C} \, (\pm 2 \, ^{\circ}\text{F})$.
- (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 $\S 63.324(d)(1)$.
 - (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),
 - (I), 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 defection 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 = $24 \frac{\text{loads}}{\text{day x } 160 \text{ pounds}}{\text{load x } 365 \text{ days}}/\text{year}$

= 1,401,600 pounds cleaned/year = 1,401,600 pounds ÷ 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

From:

Harvey, Mary

Sent:

Tuesday, July 03, 2007 12:40 PM

To:

'Katy Forney, EPA Region 4:'; 'James Little, EPA Region 4:'

Cc:

Cascio, Tom; Adams, Patty

Subject:

FW: Walt Disney World Company - Permit #0950111-028-AC

Attachments: Appendix C 2007 - Permit #0950111-028-AC-FINAL PDF: Appendix GC 2007 - Permit #0950111-028-AC-FINAL.PDF; Final AC Cover Page 2007 - Permit #0950111-028-AC-FINAL.PDF; Final AC Section 1 2007 - Permit #0950111-028-FINAL.PDF; Final AC Section 2 2007 - Permit #0950111-028-AC-FINAL.PDF; Final AC Section 3 2007 - Permit #0950111-028-AC-FINAL.PDF; Final Determination 2007 - Permit #095011-028-AC-FINAL.PDF; Notice of Final AC Permit 2007 - Permit #0950111-028-AC-FINAL.PDF; Signed Documents - Permit

#0950111-028-AC-FINAL.pdf

From: Harvey, Mary

Sent: Tuesday, July 03, 2007 12:38 PM

To: 'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney World Company:';

Bradner, James: 'Katy Forney, EPA Region 4:'; 'James Little, EPA Region 4:'

Cc: Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject: Walt Disney World Company - Permit #0950111-028-AC

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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Thank you,

DEP, Bureau of Air Regulation

From:

Harvey, Mary

Sent:

Tuesday, July 03, 2007 2:20 PM

To:

Adams, Patty

Subject:

FW: FW: Walt Disney World Company - Permit #0950111-028-AC

Attachments:

Appendix C 2007 - Permit #0950111-028-AC-FINAL.PDF; Appendix GC 2007 - Permit # 0950111-028-AC-FINAL PDF; Final AC Cover Page 2007 - Permit #0950111-028-AC-FINAL PDF; Final AC Section 1 2007 - Permit #0950111-028-FINAL PDF; Final AC Section 2

2007 - Permit #0950111-028-AC-FINAL.PDF; Final AC Section 3 2007 - Permit # 0950111-028-AC-FINAL.PDF; Final Determination 2007 - Permit #095011-028-AC-

FINAL PDF; Notice of Final AC Permit 2007 - Permit #0950111-028-AC-FINAL PDF; Signed

Documents - Permit #0950111-028-AC-FINAL.pdf













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Appendix C 2007 - Appendix GC 2007 - Final AC Cover Final AC Section 1 Final AC Section 2 Final AC Section 3 Final Determination Permit #0950...

Permit #095... Page 2007 - Per... 2007 - Perm...

2007 - Perm...

2007 - Perm...

2007 - Per...





Notice of Final AC Signed Documents -Permit #095... Permit 2007...

----Original Message----

From: Forney.Kathleen@epamail.epa.gov [mailto:Forney.Kathleen@epamail.epa.gov]

Sent: Tuesday, July 03, 2007 12:58 PM

To: Harvey, Mary

Subject: Re: FW: Walt Disney World Company - Permit #0950111-028-AC

Thanks Mary

Katy R. Forney Air Permits Section EPA - Region 4 61 Forsyth St., SW Atlanta, GA 30024

Phone: 404-562-9130 Fax: 404-562-9019

> "Harvey, Mary" <Mary.Harvey@dep .state.fl.us>

> 07/03/2007 12:39

Kathleen Forney/R4/USEPA/US@EPA, James Little/R4/USEPA/US@EPA CC

"Cascio, Tom" <Tom.Cascio@dep.state.fl.us>, "Adams, Patty"

<Patty.Adams@dep.state.fl.us>

Subject

FW: Walt Disney World Company -Permit #0950111-028-AC

1

From: Harvey, Mary

Sent: Tuesday, July 03, 2007 12:38 PM

To: 'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney World Company:'; Bradner, James; 'Katy Forney, EPA Region 4:'; 'James Little, EPA Region

4:'

Cc: Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject: Walt Disney World Company - Permit #0950111-028-AC

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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Thank you, DEP, Bureau of Air Regulation

(See attached file: Appendix C 2007 - Permit #0950111-028-AC-FINAL.PDF) (See attached file: Appendix GC 2007 - Permit #0950111-028-AC-FINAL.PDF) (See attached file: Final AC Cover Page 2007 - Permit #0950111-028-AC-FINAL.PDF) (See attached file: Final AC Section 1 2007 - Permit #0950111-028-FINAL.PDF) (See attached file: Final AC Section 2 2007 - Permit #0950111-028-AC-FINAL.PDF) (See attached file: Final AC Section 3 2007 - Permit #0950111-028-AC-FINAL.PDF) (See attached file: Final AC Section 3 2007 - Permit #0950111-028-AC-FINAL.PDF) (See attached file: Signed Documents - Permit #0950111-028-AC-FINAL.PDF) (See attached file: Signed Documents - Permit #0950111-028-AC-FINAL.PDF)

From:

Harvey, Mary

Sent:

Tuesday, July 03, 2007 12:38 PM

To:

'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney World Company:'; Bradner, James; 'Katy Forney, EPA Region 4:'; 'James Little, EPA Region

4:'

Cc:

Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject:

Walt Disney World Company - Permit #0950111-028-AC

Attachments: 0950111.028.AC.F_pdf.zip

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Thank you,

DEP, Bureau of Air Regulation

From:

Harvey, Mary

Sent:

Tuesday, July 03, 2007 2:21 PM

To:

Adams, Patty

Subject:

FW: Walt Disney World Company - Permit #0950111-028-AC

From: Schmudde, Lee [mailto:Lee.Schmudde@disney.com]

Sent: Tuesday, July 03, 2007 12:41 PM

To: Harvey, Mary

Subject: Read: Walt Disney World Company - Permit #0950111-028-AC

Your message

To: Lee.Schmudde@email.disney.com

Subject:

was read on 7/3/2007 12:41 PM.

From:

Harvey, Mary

Sent:

Tuesday, July 03, 2007 2:20 PM

To:

Adams, Patty

Subject:

FW: Walt Disney World Company - Permit #0950111-028-AC

From: Bradner, James

Sent: Tuesday, July 03, 2007 12:47 PM

To: Harvey, Mary

Subject: Read: Walt Disney World Company - Permit #0950111-028-AC

Your message

To:

'Lee Schmudde, Walt Disney World Company:'; 'Richard A. Bumar, Jr., P.E., Walt Disney World Company:'; Bradner, James; 'Katy

Forney, EPA Region 4:'; 'James Little, EPA Region 4:'

Cc:

Cascio, Tom; Adams, Patty; Gibson, Victoria

Subject:

Walt Disney World Company - Permit #0950111-028-AC

Sent:

7/3/2007 12:38 PM

was read on 7/3/2007 12:47 PM.

From:

Harvey, Mary

Sent:

Tuesday, July 03, 2007 2:20 PM

To:

Adams, Patty

Subject:

FW: Walt Disney World Company - Permit #0950111-028-AC

From: Bumar, Rich [mailto:Rich.Bumar@disney.com]

Sent: Tuesday, July 03, 2007 12:52 PM

To: Harvey, Mary

Subject: Read: Walt Disney World Company - Permit #0950111-028-AC

Your message

To: Rich.Bumar@email.disney.com

Subject:

was read on 7/3/2007 12:52 PM.