



ENVIRONMENTAL PROTECTION DIVISION

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RECEIVED

DEC 15 2005

December 9, 2005

HAND DELIVERED

BUREAU OF AIR REGULATION

Mr. Alan Zahm, P.E.

Air Permitting Supervisor, Air Resource Management

Florida Department of Environmental Protection

3319 Maguire Boulevard, Suite 232

Orlando, Florida 32803

Subject: Permitting issues regarding Regal Marine, Orlando Cogen, Central Florida Pipeline, Cellofoam, Sea World.

Dear Mr. Zahm:

Attached are the Orange County Environmental Protection Division (OCEPD) comments after reviewing the subject information.

Attachment 1: Regal Marine Industries, Facility ID 0950212, Air Construction Permit Application, dated November 11, 2005

Attachment 2: Orlando Cogen Limited, L.P., Facility ID 0950203, Proposed Permit 0950203-002-AV, dated November 29, 2005

Attachment 3: Central Florida Pipeline, L.L.C., Facility ID 0950069, Response to Air Resources Completeness Review, dated November 14, 2005, and Permit Determination Request for Insignificant Source, dated November 22, 2005

Attachment 4: Cellofoam North America, Inc., Facility ID 0951249, Intent to Issue and Draft Air Construction Permit 0951249-003-AC, dated November 15, 2005

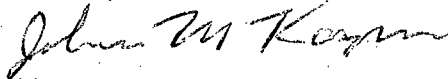
Attachment 5: Sea World of Florida, Inc., Facility ID 0950213, Intent to Issue and Draft Air Construction Permit 0950213-005-AC, dated November 18, 2005

Since my letter of November 11, 2005, OCEPD has received information from Orlando Regional Healthcare System indicating that potential emissions from combustion equipment there exceed the Title V thresholds for NOx. OCEPD is considering enforcement options against Orlando Regional Healthcare System.

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JK letter to FDEP
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Drafting permit language is beyond OCEPD's Specific Operating Agreement contractual commitments, and we will defer to the Department and EPA for rule interpretation. If you have any questions or comments, please call me at (407) 836-1443 or e-mail me at John.Kasper@ocfl.net.

Sincerely,



John M. Kasper, P.E.
Engineer II


(4,6) JK/JD/HP:na

c: Leonard Kozlov, P.E., Air Program Administrator, FDEP
Via Certified Mail Receipt Number 7003 1680 0001 1714 8063
Hamp Pridgen, Air Program Administrator, Orange County EPD
Jeff Koerner, P.E., BAR – Air Permitting North

ATTACHMENT 1

Regal Marine Industries, Facility ID 0950212, Air Construction Permit Application, dated November 11, 2005.

- 1. COMPLIANCE.** OCEPD's 2005 compliance inspection and compliance test audit of this facility were discussed in my letter to you dated August 5, 2005. The facility is in compliance.
- 2. ENFORCEMENT.** There are no open enforcement issues with this facility.
- 3. COMMENTS REGARDING THE PERMIT APPLICATION.** OCEPD has reviewed the permit application and has no further comments.

Barbara 1/18
for Sober file
Shank
Patty

ATTACHMENT 2.

Orlando Cogen Limited, L.P., Facility ID 0950203, Proposed Permit 0950203-002-AV, dated November 29, 2005.

- 1. COMPLIANCE.** OCEPD's 2005 compliance inspection and compliance tests audits of this facility were discussed in my letter to you dated August 19, 2005. The facility is in compliance.
- 2. ENFORCEMENT.** There are no open enforcement issues with this facility.
- 3. COMMENTS REGARDING THE PROPOSED PERMIT.** OCEPD has reviewed the proposed permit and has no further comment.

ATTACHMENT 3

Central Florida Pipeline, L.L.C., Facility ID 0950069, Response to Air Resources Completeness Review, dated November 14, 2005, and Permit Determination Request for Insignificant Source, dated November 22, 2005.

1. **COMPLIANCE.** Compliance issues, including the exceedance of the diesel loading rack throughput limit, were discussed in my letter to you dated November 11, 2005.
2. **ENFORCEMENT.** Enforcement was also discussed in my November 11, 2005 letter.
3. **COMMENTS REGARDING THE COMPLETENESS REVIEW RESPONSE AND DETERMINATION REQUEST.** OCEPD has reviewed the response and the determination request. We have no comment on the response, but have the following comment on the determination request. The proposed tank is larger than four existing additive tanks and the same size as five existing additive tanks. None of the existing additive tanks are considered insignificant sources. OCEPD questions how the proposed tank could be considered an insignificant source based on tank size. Tank emission calculation data is supplied for the diesel fuel additive, but OCEPD questions the advisability of considering the proposed tank insignificant based on contents of the tank because additive composition may change. OCEPD prefers to consider the proposed tank as a significant source like the other additive tanks.

ATTACHMENT 4

Cellofoam North America, Inc., Facility ID 0951249, Intent to Issue and Draft Air Construction Permit 0951249-003-AC, dated November 15, 2005.

- 1. COMPLIANCE.** Compliance issues were discussed in my letter to you dated October 28, 2005. The facility is in compliance.
- 2. ENFORCEMENT.** There are no open enforcement issues with this facility.
- 3. COMMENTS REGARDING THE INTENT TO ISSUE AND DRAFT PERMIT.** OCEPD has reviewed the intent to issue and the draft permit and has no further comment.

ATTACHMENT 5

Sea World of Florida, Inc., Facility ID 0950213, Intent to Issue and Draft Air Construction Permit 0950213-005-AC, dated November 18, 2005

1. **COMPLIANCE.** Compliance issues were discussed in my letter to you dated August 19, 2005. The facility is in compliance.
2. **ENFORCEMENT.** There are no open enforcement issues with this facility.
3. **COMMENTS REGARDING THE INTENT TO ISSUE AND THE DRAFT PERMIT.** OCEPD has reviewed the intent to issue and the draft permit and has no further comment.