Walt Disney World Company
Walt Disney World Resort Complex
Orange and Osceola Counties

Title V Air Operation Permit Renewal
Permit No. 0950111-035-AV

APPLICANT

The applicant for this project is the Walt Disney World Company. The applicant's responsible official and mailing address: Mr. Lee Schmudde, Vice President, Walt Disney Parks and Resorts U.S., Inc., P.O. Box 10000, Lake Buena Vista, Florida 32830.

FACILITY DESCRIPTION

The applicant operates the existing Walt Disney World Resort Complex, which is located in Orange and Osceola Counties with offices at 1375 Buena Vista Drive, Lake Buena Vista, Florida.

The facility is a complex of hotels, theme parks, support facilities, and utility power and water services for this theme park and resorts complex. These functions are managed by two separate entities: Walt Disney World Theme Parks and Resorts (WDW) and Reedy Creek Energy Services (RCES). The various air pollution sources are boilers, a combined cycle combustion turbine for power production, paint spray booths and architectural coatings, animal crematory, dry cleaning, general workshop operations, emergency reciprocating internal combustion engines (RICE), external combustion oil heaters and hot water heaters.

This entire facility includes 176 diesel powered emergency generator and pump engines and 10 natural gas-fired emergency engines for a total of 186 RICE. Within this group of engines, 30 are exempt from the federal rules for RICE. Of the nonexempt RICE within the complex, 116 are assigned to the Walt Disney World Resorts operations and 40 are assigned to the Reedy Creek Energy Services operations. These units are regulated under the National Emission Standards for Hazardous Air Pollutants (NESHAP) rule, 40 CFR 63 Subpart ZZZZ and/or the New Source Performance Standards (NSPS) rules 40 CFR 60, Subpart IIII (compression ignition engines) or 40 CFR 60, Subpart JJJJ (spark ignition engines).

<u>The Walt Disney World Resorts (WDW) Complex</u>

The Walt Disney World Theme Parks and Resorts (WDW) Complex is the entity that manages the parks and resorts at this facility. WDW operates the following emissions units:

The North Service Area Laundry consists of two laundry boilers (Nos. 1 & 3), which are manufactured by York-Shipley. No. 1 is rated at 300 horsepower (HP) and No. 3 is rated at 350 HP. The combined maximum total heat input of the three boilers is 27.1 MMBtu/hr from the firing of natural gas only. The laundry boilers are subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; and, they are regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less Than 250 MMBtu/hr Heat Input

The Columbia T.D. Mach 2 80-80 dry cleaning 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. The 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. The perchloroethylene dry cleaning operation is subject to 40 CFR 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities.

The animal crematory at the Animal Kingdom Park is subject to Rule 62-296.401(6), F.A.C., Animal Crematories. This emissions unit is considered a 'new' unit for purposes of Rule 62-296.401(6)(c), F.A.C.

In addition to the RICE discussed in the section above, WDW also manages painting and workshop operations and several heaters and boilers at this facility.

Reedy Creek Energy Services (RCES)

RCES is the utility part of the company that manages utility services including power production and water facilities. RCES operates the Reedy Creek Improvement District (RCID) Power Plant, which is an existing combined cycle combustion turbine (CT) system followed by an associated natural gas-fired duct burner and a heat recovery steam generator (HRSG) at the Walt Disney World Resort Complex. RCES also operates emergency and non-emergency RICE and the RCID water and wastewater facilities and storm water drainage systems at the site. Emissions unit 088 is a General Electric Model No. LM 6000PC gas turbine (nominal 50 megawatts) with heat recovery steam generator and steam turbine electrical generator (nominal 8.5 megawatts). The gas turbine includes SPRINT^{TM} spray inter-cooling technology and inlet air chilling. Emission controls on this unit include dry low NO_X burners and water injection as well as an oxidation catalyst. Natural gas (source classification code (SCC) No. 2-01-002-01) is the primary fuel with distillate oil (SCC No. 2-01-001-01) as a restricted alternate fuel limited to no more than 475 hours per year. The permitted capacity is 505 MMBtu per hour of heat input from either fuel based on a compressor inlet air temperature of 30° F and 100% load.

RCES also operates two (2) identical 3,600 horsepower large bore diesel engines (Nos. Epcot DG-1 & 2), manufactured by Stewart & Stevenson, Model Nos. S-20-645-E4B. Each engine is equipped with a 2.5 megawatt generator, Model TBGZHJ. Each generator provides emergency backup power for the Epcot theme park. Each engine is permitted to fire ultralow sulfur diesel fuel oil and allowed to operate up to 1,900 hrs/yr. These engines are under contract to be available to operate for more than 15 hours per year for emergency demand response purposes under the limited circumstances and hours as outlined in 40 CFR 63.6640(f)(2)(ii) for periods when the North American Electric Reliability Corporation (NERC) has declared an Energy Emergency Alert Level 2. RCES also operates several emergency stationary RICE at various locations around this facility for backup power or pumping water. Other Emergency generators and emergency diesel pumps are managed by the other division of the company, Walt Disney World Parks and Resorts (WDWR),are also included in the RICE section of the Title V permit.

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility to incorporate the provisions of permit No. 0950111-034-AC (issued concurrently with this permit) and to explicitly specify the applicable federal reciprocating internal combustion engine (RICE) requirements into the body of the permit.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Previous Title V Air Operation Permit No. 0950111-032-AV effective:	January 1, 2013.
Application for a Title V Air Operation Permit Revision received:	February 28, 2014.
Draft/Proposed Title V Air Operation Permit Revision Intent sent:	May 16, 2014.
Public Notice Published by Applicant:	MM/DD/YY
Notified EPA of Public Notice:	MM/DD/YY

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: Primary – 7996, Amusement and Recreation Services; Secondary - 4911 – Electrical Generation.

North American Industry Classification System (NAICS): Primary – 713110, Amusement and Theme Parks; Secondary – 221112, Fossil Fuel Electric Power Generation.

HAP: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility includes several Prevention of Significant Deterioration (PSD)-major sources of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to emissions unit (EU-088) for the controlled emissions of carbon monoxide.

GHG: The facility is identified as a major source of green house gas (GHG) pollutants.

PROJECT REVIEW

The purpose of this project is to revise the Title V air operation permit for the Walt Disney Parks and Resorts USA, Inc., to more clearly identify the specific applicable requirements from the federal reciprocating internal combustion engine (RICE) rules that each of the different engines must comply with. This revision also incorporates the provisions of permit No. 0950111-034-AC (issued concurrently with this revision project) which restricts the Epcot generators to emergency use only.

The following listing details the changes that have been made to the Title V air operation permit to reflect the changes requested by the applicant. Where appropriate, administrative type changes and corrections have also been made and are described below. Additions to the permit are shown in double underline format, while deletions are shown in ~~strike through~~ format. All changes throughout the permit have also been highlighted in yellow for ease of identification.

1. Administrative. Added emissions unit identification numbers to unit descriptions in the Table of Contents. Added electronic hyperlinks to the Table of Contents to facilitate navigation through the electronic version of the permit.
2. Administrative. Removed Appendices containing the RICE rules since applicable conditions have been included in the body of the permit.
3. Applicant Request. Revised tables in Section I., Facility Information, to reflect additions, deletions, identification number corrections and regulatory changes/corrections for the regulated engines.
4. Administrative. Revised Facility-wide Condition **FW6**. to reflect the new combined AOR/Title V Annual Emissions Fee form and submission by April 1st of any given year..
5. Administrative. Deleted Facility-wide Condition **FW7**. to reflect the deletion of the requirement to submit the old Title V Annual Emissions Fee form and payment by March 1st of any given year.
6. Applicant Request. Replaced entire Section III, Subsection E. (EU079 and EU080) to reflect changes to the underlying applicable requirements for the Epcot generators authorized by permit No. 0950111-034-AC, which reflects the company's commitment to only operate these engines under emergency situations, including emergency demand response events. Also moved the CEP Cogen Auxiliary emergency generator from the unregulated emissions units section of the permit to Subsection E. in order to impose the applicable requirements associated with operating this emergency generator for purposes of emergency demand response. The relocation of this unit from the Unregulated section of the permit removes this engine from the group of units currently identified under emissions unit ID No. EU125. All three units in Subsection E. are now collectively regulated as new emissions unit No. EU130. The three units included in Subsection E. are the only generators at the facility that are contracted to operate during periods when the North American Electric Reliability Corporation (NERC) has declared an Energy Emergency Alert Level 2. These engines will not be operated for purposes of non-emergency demand response or peak shaving.
7. Administrative. While no revisions were requested in relation to the conditions in Section III., Subsection F. for EU120, several administrative type corrections were made for clarification purposes and to better align the requirements with the current version of the RICE rules. The Specific Conditions in this Subsection have

been renumbered due to the addition and deletions of previous Specific Conditions. See the draft/proposed permit for the changes.

8. Applicant Request. Section III, Subsection G. Revised lists of engines collectively regulated under emissions unit ID Nos. EU122, EU123 and EU124; revised descriptive paragraphs to clarify rule applicability; and, added specific applicable operating and maintenance requirements for these existing compression ignition and spark ignition emergency engines. Except for portions of the previous emissions unit descriptions, Subsection G. has been nearly entirely replaced.
9. Applicant Request. Created new emissions unit Nos. EU127 and EU128 to collectively regulate the groups of "new" compression ignition emergency engines managed by WDW and RCES, respectively. Added new Section III, Subsection H. to the permit to impose the specific applicable requirements from NSPS, Subpart IIII for these engines.
10. Applicant Request. Created new emissions unit No. EU129 to regulate a single "new" spark ignition emergency managed by WDW. Added new Section III, Subsection I. to the permit to impose the specific applicable requirements from NSPS, Subpart JJJJ for this engine.
11. Administrative. Added hyperlinked contents page to Appendix Section VI. to aid in navigation through electronic document.
12. Administrative. Updated Appendix A, Abbreviations, Acronyms, Citations and Identification Numbers, with latest version.
13. Administrative. Revised Appendix NESHAP, Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines to insert an electronic link to the posted version of the rule and to remove extraneous references to "West County".
14. Administrative. Deleted Appendix NESHAP, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, Appendix NSPS, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and Appendix NSPS, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines from the appendix document since the applicable requirements are now explicitly included in the body of the permit. The text of these rules has been replaced by electronic links to the posted versions of the federal rules.
15. Administrative. Replaced Appendix RR, Facility-wide Reporting Requirements, with latest version.
16. Applicant Request and Administrative. Updated Appendix U, List of Unregulated Emissions Units and/or Activities, to reflect the deletion of the "Cogen Auxiliary Generator – CEP" from the unregulated units due to its placement in the body of the permit as a regulated Alert Level 2 emergency demand response generator subject to maintenance and reporting requirements under NESHAP ZZZZ. Clarifying notations were also added for the remaining "exempt" emergency engines.
17. Administrative. Updated Table H, Permit History, to reflect current projects.
18. Administrative. Summary Tables 1 and 2 were updated to reflect changes made during this permitting action and were inserted into the Appendix section for convenience.

CONCLUSION

This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, 62-213 and 62-214, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.