Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Robbins Manufacturing Company
P.O. Box 17939
Tampa, FL 33682

Air Permit No. 1190011-007-AO
Permit Expires: 03/14/2016*
Minor Air Operation Permit
Project Name: Operation Permit Renewal

Authorized Representative:
Mr. Jerome G. Robbins, II, Vice President

This is the final air operation permit, which authorizes the continued operation of the sawmill and wood products facility. The facility (Standard Industrial Classification No. 2421) is located in Sumter County at S.R. 50 and Route 471 in Tarrytown, Florida. The UTM coordinates are Zone 17, 396.7 km East, and 3158.9 km North.

(***Emissions Unit Permit Expiration Date** – EU ID No. 002 had not operated for 6 months or more prior to the expiration date of the previous operation permit for this facility (1190011-006-AO). The last date of operation occurred on 09/06/2009. In accordance with the requirements of Rule 62-210.300(2)(a)3.b., F.A.C., the operation permit expiration date for EU ID No. 002 is five years from the date of shutdown. Therefore the operation permit expiration date for EU ID No. 002 is **09/06/2014**. See Section 2, Specific Condition No. 10 for permit renewal application requirements and Section 3, Section A. for additional notification and compliance testing requirements associated with this emissions source.)

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution 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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

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 final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, 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 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.

All petitions filed under these rules shall contain:

(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 of the Florida Administrative Code.

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.

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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Mara Grace Nasca Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Jerome G. Robbins, II, Robbins Manufacturing Company
(jrobbins@robbinslumber.com)

Mr. Cory Houchin, Environmental Science Group, Inc.
(HouchinC@environmentalsciencesgroup.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date)

FACILITY DESCRIPTION

Existing Facility

This is a sawmill facility that produces untreated wood products such as utility poles and lumber. The facility includes two regulated wood fired boilers and one exempt boiler that supply heat to the facility's two kilns used for drying wood.

The existing facility consists of the following emissions units.

Facility ID No. 1190011	
ID No.	Emission Unit Description
001	ABCO Industries boiler (west)
002	Hurst boiler (east)
003	Kiln No. 1 (northeast)
004	Kiln No. 2 (southwest)
005	Sawdust Storage Silo
006	Planer Shavings Storage Bin

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

- A 150 HP Hurst, Series 400, boiler fired with only LP Gas was installed in October 2001, and is considered exempt per Rule 62-210.300(a)33., F.A.C. At a maximum LP Gas usage rate of 69 gallons/hour and based on 91,500 BTU/gallon of LP Gas, this boiler has a maximum heat input rate of 6.3 MMBTU/hr.
- A Bark Storage Bin located to the north of the Planer Shavings Storage Bin is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The bark is transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Bark Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.
- A Sawdust Storage Bin located to the north of the Bark Storage Bin is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The sawdust is transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Sawdust Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.
- A Wood Chip Storage Bin located to the east of the Planer Shavings, Bark, and Sawdust Storage Bins is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The wood chips are transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Wood Chip Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant PM_{10}.

PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 1190011-006-AO

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing 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, 62-296 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. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
   [Rule 62-210.370(3), F.A.C.]

8. Recordkeeping – Reasonable Precautions: The permittee shall record and maintain logs/records of any reasonable precautions taken to demonstrate compliance with the applicable requirements contained in Appendix C, Condition No 9. of this permit. The logs/records shall include the following:

   a. Date

   b. Start and end time

   c. Type of activity performed

   [Rule 62-4.070(3), F.A.C. and Construction Permit 1190011-005-AC]

9. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. *(Note that the expiration date of Emissions Unit ID No. 002 occurs prior to the expiration date of this permit. See Specific Condition No. 10 for details.)* To properly apply for an operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

   c. copies of the most recent compliance test reports required by Specific Condition No. A.11. if not previously submitted; and

   d. copies of the most recent two months of records/logs specified in Specific Condition Nos. A.12., B.3. and C.3.

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

10. EU ID No. 002 Permit Renewal Application: **– IMPORTANT –** An application for renewal of EU No. 002 (only) shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of EU No. 002. The emissions unit permit expiration date for EU No. 002 is on **09/06/2014**. When the permit renewal applications for the EU ID No. 002 is submitted, the operation permit will be revised to change the emissions unit permit expiration date of EU ID No. 002 to the facility permit expiration date (i.e., the expiration date of Operation Permit 1190011-007-AO). Since the fee submitted as part of the application for Operation Permit 1190011-007-AO already covers this 5-year period, no additional application fee is required for the EU ID No. 002 early renewal application.)
    [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU Nos. 001 and 002 - Process Boilers

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	ABCO Industries boiler (west): This emissions unit consists of a 260 HP ABCO Industries 72' x 20' wood (wood chips) fired boiler. Wood chip piles on the ground are transferred to an enclosed mechanical screw conveyor that transfers the wood chips to the boiler. The maximum heat input to the boiler is 13.1 MMBTU (Million British Thermal Unit)/hour (daily average), based on a maximum wood firing rate of 1,875 lbs/hr. with the wood having an expected BTU value of 7,000 BTU's/pound. Emissions from the boiler are controlled by a S & S Construction Company cyclone separator with a design flow rate of 9,405 ACFM. The boiler can supply heat to the Kiln No. 1 (northeast) and/or Kiln No. 2 (southwest). This boiler is located to the west of the Hurst boiler - Emission Unit ID No. 002.
002	Hurst boiler (east): This emissions unit consists of a wood (sawdust) fired 260 HP Hurst Firebox Steam Boiler. The sawdust is fed to the boiler by an enclosed screw conveyor from a Sawdust Storage Silo. The maximum heat input to the boiler is 13.1 MMBTU/hour (daily average), based on a maximum wood firing rate of 1,875 lbs./hr. with the wood having an expected BTU value of 7,000 BTU's/pound. Emissions from the boiler are controlled by a Hurst Multicyclone Collector with a design flow rate of 6,650 ACFM. The boiler can supply heat to the Kiln No. 1 and/or Kiln No. 2. This boiler is located to the east of the ABCO boiler - Emission Unit No. 001.

*(*Important permitting note - EU ID No. 002 had not operated for 6 months or more prior to the expiration date of the previous operation permit for this facility (1190011-006-AO). The last date of operation occurred on 09/06/2009. In accordance with the requirements of rule 62-210.300(2)(a)3.b., F.A.C., the operation permit expiration date for EU ID No. 002 is 5 years from the date of shutdown. Therefore the operation permit expiration date for EU ID No. 002 is 09/06/2014. See Specific Condition No. 10 in Section 2. for operation permit renewal application requirements, Specific Condition No. A.10. for EU ID No. 002 startup notification requirements and Specific Condition No. A.5. for compliance testing requirements upon startup of operation.)*

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements: Both boilers are subject to 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which is adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800(8), F.A.C.]

A.2. Permitted Capacity – Heat Input Limitations: The permittee shall comply with the following boiler heat input rate limitations:

a. The maximum heat input rate to each boiler is 13.1 MMBTU/hour, based on a daily average. The heat input rate is determined from the amount of wood* (sawdust/wood chips) used to fire the boiler.

b. The maximum firing rate of wood* (sawdust/wood chips as appropriate) to each boiler is 1,875 pounds/hour, based on a daily average.

**The ABCO boiler (Emission Unit ID No. 001) is only fired with wood chips and the Hurst boiler (Emission Unit ID No. 002) is only fired with sawdust.*

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1190011-004-AC]

A.3. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit 1190011-004-AC]

EMISSIONS STANDARDS

A.4. Visible Emissions Standard: Visible emissions from each boiler shall not exceed 20% opacity, except for one two-minute period per hour during which visible emissions shall not exceed 40% opacity.

{Permitting Note: Both boilers are subject to Rule 62-296.410, F.A.C. - Carbonaceous Fuel Burning Equipment.}

[Rule 62-296.410(2), F.A.C.]

TESTING REQUIREMENTS

A.5. Compliance Test After First Operation of E.U. ID No. 002: EU ID No. 002 shall be tested to demonstrate compliance with the visible emissions standards no later than 30 days after the first operation that occurs after the effective date of this facility permit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

A.6. Compliance Tests: During each federal fiscal year (October 1st to September 30th), each emissions unit shall be tested to demonstrate compliance with the visible emissions standards.
[Rule 62-297.310, F.A.C.]

A.7. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.8. Test Method: Required tests shall be performed in accordance with the following reference method.

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources (DEP Method 9 is required with a minimum test period of 60 minutes)

The above method(s) are described in Rule 62-297.401(9)(c), F.A.C. and Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.9. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

{*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.10. EU ID No. 002 Startup Notification: The permittee shall notify the department in writing of the intent to startup EU ID No. 002 a minimum of 60 days prior to the intended startup date. The notification shall include the startup date, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.
[Rule 62-210.300(5), F.A.C.]

RECORDS AND REPORTS

A.11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. Additionally, each test report shall include the heat input rate during the test period and a copy of the logs/records for the day the test was conducted.
[Rule 62-297.310(8), F.A.C.]

A.12. Daily Recordkeeping: The permittee shall maintain the following records for each boiler:

a. Date & Emission Unit ID No.

b. The amount of wood (sawdust/wood chips as appropriate) combusted, in lbs.

c. The number of hours of combusting wood (sawdust/wood chips as appropriate).

d. The calculated daily average hourly heat input rate, in MMBTU/hr.

Daily records shall be completed by the end of the following 3rd business day.

[40 CFR 60.48c(g) and Rule 62-4.070(3), F.A.C.]

B. EU Nos. 003 and 004 - Kilns

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
003	Kiln No. 1 (northeast): This kiln is used to dry wood, which consists of lumber and/or poles. The typical maximum charge to the kiln is 138 Mbf/charge. Heat to the kiln is supplied by any combination of 3 boilers (i.e., the ABCO Industries boiler, the Hurst boiler, and 150 HP Hurst, Series 400, exempt boiler). Kiln No. 1 is located to the northeast of Kiln No. 2.
004	Kiln No. 2 (southwest): This kiln is used to dry wood, which consists of lumber and/or poles. The typical maximum charge to the kiln is 138 Mbf/charge. Heat to the kiln is supplied by any combination of the same 3 boilers that supply heat to Kiln No. 1. Kiln No. 2 is located to the southwest of Kiln No. 1.

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity – Operation Limitations: The permittee shall comply with the following kiln operation limits:

a. Kiln No. 1 – The maximum process/throughput rate of drying lumber and/or poles is 21,600 Mbf per any consecutive 12 month period.

b. Kiln No. 2 – The maximum process/throughput rate of drying lumber and/or poles is 24,000 Mbf per any consecutive 12 month period.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1190011-004-AC]

B.2. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit 1190011-004-AC]

RECORDS AND REPORTS

B.3. Daily and Monthly Recordkeeping: The permittee shall maintain the following records for each kiln:

a. Daily Records

(1) Date & Emission Unit ID No.

(2) The amount of lumber and/or poles dried in Mbf.

b. Monthly Records

(1) Month and Year & Emissions Unit ID No.

(2) The amount of lumber and/or poles dried in Mbf for the month.

(3) The amount of lumber and/or poles dried in Mbf for the most recent consecutive 12 month period.

Daily records shall be completed by the end of the 3rd business day and monthly records shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C., Construction Permit 1190011-005-AC]

C. EU Nos. 003 and 004 – Storage Silos and Storage Bin

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
005	Sawdust Storage Silo: Sawdust is transferred pneumatically from the sawmill to the Sawdust Storage Silo that feeds the Hurst boiler (Emission Unit ID No. 002) at a maximum constant rate of 13.82 tons/hr. Emissions from filling the silo are controlled by a cyclone with a design airflow rate of 27,500 acfm.
006	Planer Shavings Storage Bin: Wood shavings are transferred pneumatically from the planer to the Planer Shavings Storage Bin at a maximum constant rate of 5.6 tons/hr. Emissions from filling the bin are controlled by a cyclone with a design airflow rate of 16,500 acfm.

PERFORMANCE RESTRICTIONS

C.1. Permitted Capacity – Operation Limitations: The permittee shall comply with the following operation limits:

a. Sawdust Storage Silo - The maximum filling rate of the silo is 13.82 tons/hour and considered a constant value whenever the sawmill is operating.

b. Planer Shavings Storage Bin – The maximum filling rate of the bin is 5.6 tons/hour and considered a constant value whenever the planer is operating.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1190011-005-AC]

C.2. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

C.3. Daily Recordkeeping: The permittee shall maintain the following daily records:

a. Date & Emission Unit ID No.

b. The hours of operation of the sawmill.

c. The hours of operation of the planer.

The daily logs/records shall be completed by the end of the 3rd business day.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1190011-005-AC]