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

DRAFT PERMIT

PERMITTEE

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

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

Air Permit No. 1190011-008-AC
Permit Expires: 06/01/2013
Minor Air Construction Permit
Project Name: Construction of Wood Preserving Operation

This is the final air construction permit for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation. The proposed work will be conducted at the Robbins Manufacturing Company facility (Standard Industrial Classification No. 2421). The facility 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. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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

Due to 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Robert C. Wong 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 Determination, 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.

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

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

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

Project Description and Proposed Emissions Unit

This project is for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation. This operation will utilize CCA as the primary preservative to pressure treat lumber. In addition to CCA, other preservatives such as borates, ammoniacal copper quaternary compounds, etc. may also be utilized in the future. The CCA operation is subject to 40 CFR 63, Subpart QQQQQQ – National Emissions Standards for Hazardous Air Pollutants for Wood Preserving Area Sources. This project will add the following emissions units.

Facility ID No. 1190011	
ID No.	Emission Unit Description
007	Wood Preserving Operation

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 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.
- A small kiln that uses a propane fired 0.25 MMBTU/hour heater 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}. The restriction on heat input rates to the boilers in this facility will ensure that the facility's PM_{10} emissions will be below the threshold for a Title V source

PERMIT HISTORY/AFFECTED PERMITS

This permit modifies Permit No. 1190011-007-AO

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

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;
   e. Appendix E. Management Practice Plan - 40 CFR 63, Subpart QQQQQQ;
   f. Appendix F. 40 CFR 63, Subpart A;
   g. Appendix G. 40 CFR 63, Subpart QQQQQQ

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. Application for Non-Title V Air Operation Permit: This permit authorizes the after-the-fact construction of the permitted emissions unit (EU No. 007) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air 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.; and,

   c. copies of the most recent month of records/logs specified in Specific Condition No. A.6.

   The application shall be submitted to the Permitting Authority.

   [Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

A. EU No. 007 - Wood Preserving Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
007	Wood Preserving Operation: This emissions unit is a wood preserving operation that utilizes pressure treatment cylinders and chemical preservatives to pressure treat lumber. This operation utilizes chromated copper arsenate (CCA) which is subject to 40 CFR 63, Subpart QQQQQQ – National Emissions Standards for Hazardous Air Pollutants for Wood Preserving Area Sources. In addition to CCA, this operation may also utilize other preservatives such as borates, ammoniacal copper quaternary compounds which are not subject to 40 CFR 63, Subpart QQQQQQ. The operation includes two pressure treatment cylinders and several associated tanks. The wood preserving operation's large pressure treatment cylinder is 96' long by 7'diameter, has double doors, and operates at 150 psig pressure. The cylinder has one concentrate chemical tank, an effluent water tank, and four chemical mix tanks. Industrial products (i.e., class poles, marine piling, foundation piling, barn poles, corner/fence post and plywood) will be treated in this cylinder. Some industry related lumber (rough marine lumber, structural lumber, structural timbers) will also be treated. The cylinder and mix system will use CCA as the chemical preservative. The smaller pressure treatment cylinder is 40' long by 6.7'diameter, has a single door, and also operate at 150 psig pressure. The cylinder has one concentrate chemical tank, an effluent water tank, and one chemical mix tank. The cylinder and mix system will use either copper azole or alkaline copper quaternary (ACQ) as the chemical preservative. This emissions unit CCA operation is considered an area source of HAPs (i.e., Arsenic and Chromium Compounds) and is defined as a new wood preserving operation in 40 CFR 63, Subpart QQQQQQ .

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 63, Subpart QQQQQQ – National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources, which is adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800(11), F.A.C.]

A.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.]

A.3. Application of Wood Preservatives: Wood preservatives containing chromium, arsenic, dioxins, or methylene chloride must be applied to the wood products inside a retort or similarly enclosed vessel.
[Rules 62-204.800, FAC and 40 CFR 63.11430(a)]

A.4. Management Practice Plan: The permittee shall operate and maintain this emission unit in accordance with the attached management practice plan to minimize air emissions from the preservative treatment of wood at the area source.

{Permitting Note: See Appendix E - Management Practice Plan - 40 CFR 63, Subpart QQQQQQ.}

[Rules 62-204.800, FAC and 40 CFR 63.11430(c)]

NOTIFICATION REQUIREMENTS

A.5. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 007, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

A.6. Recordkeeping: In addition to maintaining records to satisfy the requirements of the Management Practice Plan of Specific Condition No. A.4., the permittee shall also maintain the following records for each treatment cylinder using wood preservatives containing chromium, arsenic, dioxins, or methylene chloride. The record logs shall include, but are not limited to, the following:

A. Daily Records:
   1) Facility Name, Facility Number (1190011), Emission Unit No. (EU-007), Date;
   2) Cylinder description or identification number; and
   3) Charge records (i.e. charge times and pressure readings during charge).

B. Monthly Records:
   1) Facility Name, Facility Number (1190011), Emission Unit No. (EU-007), Month, Year;
   2) Cylinder description or identification number and treatment process
   3) The types and quantity of wood preservative used.

   At the permittee's option, "quantity purchased" may be reported to satisfy the requirement of "quantity used", provided no materials are used which are not purchased.

[Rule 62-4.070(3), F.A.C. and 40 CFR 63.11430(c)2]