TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Facility ID No. 1190011

PROJECT

Project No. 1190011-008-AC
Application for Minor Air Construction Permit
Project Name: Construction of Wood Preserving Operation

COUNTY

Sumter, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

April 26, 2012

Prepared by Danny Stubbs

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

Mr. Jerome G. Robbins, II, Vice President
Robbins Manufacturing Company
P.O. Box 17939
Tampa, FL 33682

B. Professional Engineer:

Mr. Cory Houchin, PE
Environmental Science Group, Inc.
P.O. Box 7495
Tampa, FL 33673

C. Project Location:

Sumter County at S.R. 50 and Route 471 in Tarrytown, Florida

Figure 1. Aerial view and map location of the Robbins Manufacturing Company. Images obtained from Google Maps.

D. Project Summary:

This project is for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving (pressure treatment) 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. This operation is subject to 40 CFR 63, Subpart QQQQQQ – National Emissions Standards for Hazardous Air Pollutants for Wood Preserving Area Sources. It is classified as a new wood preserving operation and is an area source of HAPs (i.e., Arsenic and Chromium Compounds).

E. Application Information:

Application Received on: 4/2/2012
Application Complete: 4/2/2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source

Subject to:	Y/N	Comments
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	facility sawdust handling activities could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	wood drying operation associated with the facility's two kilns may be a source of VOC and odors
Rule 62-296.401-470, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Sumter County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	Sumter County is not an air quality maintenance area or area of influence for particulate matter and therefore not subject to PM RACT rule
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category for this project (EU No. 007)
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category for this project (EU No. 007)
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	Y	EU No. 007 is subject to 40 CFR 63, Subpart QQQQQQ
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	compliance testing is not required for EU No. 007

III. Summary of Emissions:

EU No. 001 - ABCO Industries boiler (west)
EU No. 002 - Hurst boiler (east)
EU No. 003 - Kiln No. 1 (northeast)
EU No. 004 - Kiln No. 2 (southwest)
EU No. 005 - Sawdust Storage Silo
EU No. 006 - Planer Shavings Storage Bin
EU No. 007 - Wood Preserving Operation

Pollutant	EU No.	Potential Emissions (tpy)	Allowable Emissions (tpy)
PM	001	20.1	
	002	20.1	
	005	8.75	
	006	8.75	

Pollutant	EU No.	Potential Emissions (tpy)	Allowable Emissions (tpy)
	Exempt Boiler	0.2	
	Total	57.9	
PM10	001	18.4	
	002	18.4	
	005	8.75	
	006	8.75	
	Exempt Boiler	0.2	
	Total	54.5	
VOC	001	1.0	
	002	1.0	
	003	37.8	
	004	42.0	
	Exempt Boiler	0.2	
	Exempt Kiln	0.9	
	Total	82.9	
NOx	001	12.6	
	002	12.6	
	Exempt Boiler	2.7	
	Total	27.9	
SO2	001	1.4	
	002	1.4	
	Total	2.8	
CO	001	34.5	
	002	34.5	
	Exempt Boiler	2.3	
	Total	71.3	
Individual HAP (Arsenic Compounds)	007	3 E-6	
Individual HAP (Chromium Compounds)	007	3 E-6	
VE	001		20% opacity/40% for one two-minute period per hour
	002		20% opacity/40% for one two-minute period per hour

Note : PM, PM10, NOx, CO, SO2 and VOC potential emissions are from the technical evaluation DEP Project completed as part of DEP Project 1190011-004-AC. HAP potential emission are from the permit application April 4, 2012. VOC emissions listed for the "Exempt Kiln" are based on calculations included in an email from Mr. Cory Houchin (the Application PE) dated April 5, 2012.

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).