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Secretary

FINAL PERMIT

PERMITTEE

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

Authorized Representative:
Mr. Jerome G. Robbins, II, Secretary

Air Permit Nos. 1190011-009-AC &
1190011-010-AO
Permits Expires: 04/30/2013 (AC)
03/14/2016 (AO)
Minor Air Construction and Operation Permits
Project Name: AC/AO to Make Permit Corrections and Incorporate Wood Preserving Operation

These are the final air construction and operation permits, in one document. Construction Permit No. 1190011-009-AC is for the correction of several discrepancies that were discovered in the facility's previous permit descriptions and specific conditions. Operation Permit No. 1190011-010-AO incorporates the corrections of Construction Permit No. 1190011-009-AC and incorporates the part of the Wood Preserving Operation of Construction Permit No. 1190011-008-AC. 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. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

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, this document contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this document.

These air pollution permits are 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 these permits. 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 these final permits, 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

_____ _____

Kelley M. Boatwright 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 Permits 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 the date indicated below 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 AND PROJECT DESCRIPTION

Existing Facility

This facility is a sawmill that produces untreated and treated wood products such as utility poles and lumber. It includes two regulated wood fired boilers that supply heat to the facility's two kilns (used for drying wood) and a pressure treatment cylinder used in the wood preserving operation. The existing facility consists of the following emissions units (EUs).

EU 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
007	Wood Preserving Operation (Large Cylinder)

* This is the initial incorporation of EU ID No. 007 into the operation permit.

Project Description and Affected Emission Units

The purpose of this project is to correct several discrepancies related to equipment design specifications, processing rates and physical properties of material described in the facility's operation permit and to partially incorporate the Wood Preserving Operation authorized in Construction Permit No. 1190011-008-AC.

Summary of construction permit changes (1190011-009-AC):

- In the Emissions Unit Description section of the ABCO Boiler (EU No. 001) and in Specific Condition No. A.2.a., the maximum heat input was corrected from 13.1 to 10.88 MMBtu/hour. Annual MMBtu equivalent 95,309 MMBtu of was added.
- In the Emissions Unit Description section of the ABCO Boiler (EU No. 001), the BTU value of the wood used to fire the boiler was corrected from 7,000 to 7,368 BTU/pound and the wood firing rate was also corrected from 1,875 to 1,476 lb/hour.
- In the Emissions Unit Description section of the Hurst Boiler (EU No. 002) and in Specific Condition No. A.2.b., the maximum heat input was corrected from 13.1 to 8.37 MMBtu/hour. Annual MMBtu equivalent 73,322 MMBtu of was added.
- In the Emissions Unit Description section of the Hurst Boiler (EU No. 002), the BTU value of the wood used to fire the boiler was corrected from 7,000 to 5,420 BTU/pound, the sawdust firing rate was also corrected from 1,875 to 1,542 lb/hour and the boiler horsepower was corrected from 260 to 200 horsepower
- Daily recordkeeping requirements for Emissions Unit Nos. 003 and 004 were removed.
- The maximum wood firing rate of 1,875 pounds/hour (to each boiler) which was previously included in Specific Condition No A.2., was removed.

- In the Emissions Unit Description section of the Sawdust Storage Silo (EU No. 005) and in Specific Condition No. C.1.a., the maximum silo filling rate was corrected from 13.82 to 9.3 tons/hr.
- In the Emissions Unit Description section of the Planer Shavings Storage Bin (EU No. 006) and in Specific Condition No. C.1.b., the maximum silo filling rate was corrected from 5.6 to 2.33 tons/hr.
- Daily recordkeeping for the two boilers was replaced with monthly recordkeeping in Specific Condition No. A.10.

Summary of operation permit changes (1190011-010-AO):

- All of the construction permit changes listed above are incorporated into the operation permit.
- The Wood Preserving Operation (EU No. 007) in Construction Permit No. 1190011-008-AC in was partially incorporated. Specifically, the large pressure treatment cylinder constructed was added to the permit. The small pressure treatment cylinder described in the construction permit was not incorporated.
- Permitting notes and specific conditions related to the early expiration date of the Hurst Boiler (EU No. 002) in the Renewal Permit No. 1190011-007-AO were removed.

  Note: At the time of the renewal, the Hurst Boiler had been shut down for more than six months and as a result, had a permit expiration date of 9/6/2014, while the operation permit has an expiration date of 3/14/2016. Because the boiler was in operation and performed compliance testing in 2012, the permitting notes and specific conditions related to the early expiration date in the Renewal Permit No. 1190011-007-AO were removed.
- The 150 HP Hurst, Series 400, boiler fired with only LP Gas which was previously included in the "Exempt Emission Units/Activities" section of the permit, was removed. The boiler has been permanently removed from the facility. The descriptions of Kiln Nos. 1 & 2 (EU Nos. 003 & 004) were revised to remove the reference to the 150 HP exempt boiler.
- A small kiln (10,000 board feet per charge) that was installed in 2005 was add to the list of "Exempt Emission Units/Activities".

This project will modify the following emissions units.

EU 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

The following activities are exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.

- The Bark Storage Bin located to the north of the Planer Shavings Storage Bin. Bark is transferred to the bin by conveyor belt from the sawmill.
- The Bark Storage Bin's truck loading operation located under the Bark Storage Bin.
- The Sawdust Storage Bin located to the north of the Bark Storage Bin. Sawdust is transferred to the bin by conveyor belt from the sawmill.
- The Sawdust Storage Bin's truck loading operation located under the Sawdust Storage Bin.
- The Wood Chip Storage Bin located to the east of the Planer Shavings, Bark, and Sawdust Storage Bins. Wood chips are transferred to the bin by conveyor belt from the sawmill.
- The Wood Chip Storage Bin's truck loading operation located under the Wood Chip Storage Bin.
- The small kiln (installed in 2005) that uses a 0.25 MMBtu/hr pool heater fired with propane and processes up to 0.010 million board feet (MBf) per charge.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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 Volatile Organic Compounds (VOC). The restrictions amount of material processed in this permit will ensure that the facility's VOC emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1190011-007-AO, Construction Permit Nos. 1190011-004-AC and 1190011-005-AC, and partially incorporates terms and conditions of Construction Permit No. 1190011-008-AC.

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), Central District Office's Air Resource Management Section. The Central District's mailing address and phone number is:

Florida Department of Environmental Protection
Central District Office
Air Resource Management Section
3319 Maguire Blvd., Ste 232
Orlando, FL 32803-3767
Telephone: 407-897-4100

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 Central 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. Recordkeeping – Reasonable Precautions To Prevent Unconfined Particulate Emissions - 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. (Unconfined Particulate Emissions) of this permit. The logs/records shall include the following:

a. date;
b. start and end time; and
c. type of activity performed.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1190011-009-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. 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.9. if not previously submitted; and
d. copies of the most recent two months of records/logs specified in Specific Condition Nos. A.10., 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.]

A. EU Nos. 001 and 002 - Process Boilers

This section of the permit addresses the following emissions units.

EUID 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 10.88 MMBtu (Million British Thermal Unit)/hour, based on a maximum wood firing rate of 1,476 lbs/hr. with the wood having an expected BTU value of 7,368 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. *Note: The ABCO boiler is only fired with wood chips.*
002	Hurst boiler (east): This emissions unit consists of a wood (sawdust) fired 200 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 8.37 MMBtu/hour, based on a maximum sawdust firing rate of 1,542 lbs./hr. with the sawdust having an expected BTU value of 5,420 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. *Note: The Hurst boiler is only fired with sawdust.*

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements - ABCO boiler (EUID No. 001) is 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.

{Permitting Note: The only applicable requirement of 40 CFR 60, Subpart Dc for the ABCO Industries boiler is the fuel recordkeeping requirements which has been included in Specific Condition No. A.10. The maximum design heat input capacity of the Hurst Boiler (EUID No. 002) is below 10 MMBtu/hour; therefore, it is not subject to 40 CFR 60, Subpart Dc}

[Rule 62-204.800(8), F.A.C.]

A.2. Permitted Capacity - The maximum design heat input capacities for the boilers are as follows.

a. The hourly maximum design heat input capacity to the ABCO boiler is 10.88 MMBtu/hour. The equivalent annual maximum heat input capacity is 95,309 MMBtu per any consecutive 12 month period.

b. The hourly maximum design heat input capacity of the Hurst boiler is 8.37 MMBtu/hour. The equivalent annual maximum heat input capacity is 73,322 MMBtu per any consecutive 12 month period.

{Permitting Note: The hourly maximum design heat input capacity of each boiler is specified for compliance test purposes only. Compliance tests must be conducted with each boiler operating at its permitted capacity which (for compliance testing) is defined as 90 to 100 percent of the maximum design heat input capacity. Demonstration of compliance with the hourly maximum design heat input capacity during normal operation is not required. See requirements contained in Appendix D, Condition 1, titled Operation Rate During Testing.}

[Rule 62-210.200 (Definition of Potential to Emit), F.A.C.; Construction Permit No. 1190011-009-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 (Definition of Potential to Emit), F.A.C.; Construction Permit No. 1190011-009-AC]

EMISSIONS STANDARDS

A.4. Visible Emissions Standard - Visible emissions (VE) 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.]

COMPLIANCE TESTING REQUIREMENTS

A.5. 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.6. Compliance Test Requirements - Compliance 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.7. Compliance Test Method(s) - Required compliance tests shall be performed in accordance with the following reference method(s).

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

NOTIFICATION REQUIREMENTS

A.8. 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.]

RECORDS AND REPORTS

A.9. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. Additionally, each test report shall include:

a. the amount of wood (sawdust/wood chips as appropriate) combusted during the test period, in lbs; and

b. the calculated heat input rate (MMBtu/hour) during the test period.

[Rule 62-297.310(8), F.A.C.; Construction Permit No. 1190011-009-AC]

A.10. Monthly Recordkeeping – The permittee shall maintain the following records for each boiler:

a. the Emission Unit No., month and year;

b. the amount of wood (sawdust/wood chips as appropriate) combusted for the month in lbs; and

c. the heat input rate (MMBtu) for the month and for the most recent consecutive 12 month period.

Monthly records shall be completed by the end of the following month.

[NSPS, Subpart Dc - 40 CFR 60.48c(g)(2) and Rule 62-4.070(3), F.A.C.; Construction Permit No. 1190011-009-AC]

B. EU Nos. 003 and 004 - Kilns

This section of the permit addresses the following emissions units.

EUID 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 2 boilers (i.e., the ABCO Industries boiler and the Hurst 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 2 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 – The throughput rates for the kilns are limited as follows.

a. Kiln No. 1 – The maximum process/throughput rate of drying lumber and/or poles is 21,600 million board feet (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 (Definition of Potential to Emit), F.A.C.; Construction Permit No. 1190011-009-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 (Definition of Potential to Emit), F.A.C.; Construction Permit No. 1190011-009-AC]

RECORDS AND REPORTS

B.3. Monthly Recordkeeping - The permittee shall maintain the following records for each kiln.

a. Month and Year & Emissions Unit ID No.
b. The amount of lumber and/or poles dried in Mbf for the month.
c. The amount of lumber and/or poles dried in Mbf for the most recent consecutive 12 month period.

Monthly records shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C., Construction Permit No. 1190011-009-AC]

C. EU No. 008 and 004 – Storage Silos and Storage Bin

This section of the permit addresses the following emissions units.

EUID 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 9.3 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 2.33 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 – The filling rates for the Sawdust Storage Silo and Planer Shavings Storage Bin are limited as follows.

a. Sawdust Storage Silo - The maximum filling rate of the silo is 9.3 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 2.33 tons/hour and considered a constant value whenever the planer is operating.

[Rule 62-210.200 (Definition of Potential to Emit), F.A.C.; Construction Permit No. 1190011-009-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 (Definition of Potential to Emit), F.A.C.; Construction Permit No. 1190011-009-AC]

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 No. 1190011-009-AC]

C. EU No. 007 – Wood Preserving Operation

This section of the permit addresses the following emissions unit.

EUID 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. 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

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

{Permitting Note: Applicable requirements of 40 CFR 63, Subpart QQQQQQ are included in Specific Condition Nos. D3, D4 and D5.}

[Rule 62-204.800(11), F.A.C.]

D.2. Hours of Operation - The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.; Construction Permit No. 1190011-008-AC]

D.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(11), F.A.C.; NESHAP 40 CFR 63, Subpart QQQQQQ - 63.11430(a)]

D.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(11), FAC; NESHAP 40 CFR 63, Subpart QQQQQQ - 63.11430(c)]

RECORDS AND REPORTS

D.5. Recordkeeping - In addition to maintaining records to satisfy the requirements of the Management Practice Plan of Specific Condition No. D.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.

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. and NESHAP 40 CFR 63, Subpart QQQQQQ - 63.11430(c)2; Construction Permit No. 1190011-008-AC]