#### McDonald, Jim

From: Schneider, Sheila

**Sent:** Tuesday, July 27, 2004 9:17 AM

To: Waters, Jason; McDonald, Jim; Pouso, Jon; Soich, Robert

Cc: Smolen, Joel

Subject: RE: Robbins Manufacturing

I understand that it's NSPS. That will only affect (as far as my penalties go) whether I call them an HPV or not. My penalties change based on whether a facility is "major", or "major" for the pollutant. Thanks for the info, though.

----Original Message----From: Waters, Jason

Sent: Tuesday, July 27, 2004 9:12 AM

To: Schneider, Sheila; McDonald, Jim; Pouso, Jon; Soich, Robert

Cc: Smolen, Joel

Subject: RE: Robbins Manufacturing

Sheila,

It should not matter whether they are TV as it's an NSPS violation, which is a violation of Federal Rule.

They will have to provide additional info on their other activities as well probably.

Jason

----Original Message-----**From:** Schneider, Sheila

Sent: Tuesday, July 27, 2004 9:06 AM

To: Waters, Jason; McDonald, Jim; Pouso, Jon; Soich, Robert

Cc: Smolen, Joel

Subject: RE: Robbins Manufacturing

It's my understanding that this application is their attempt to relieve them from Title V requirements. We are calculating the penalty for our current case based on the assumption that they will not be Title V. Please notify me if that is not the case after you review the app.

Thanks, Sheila

> ----Original Message-----From: Waters, Jason

**Sent:** Wednesday, July 21, 2004 9:05 AM

To: McDonald, Jim; Schneider, Sheila; Pouso, Jon; Soich, Robert

Cc: Smolen, Joel

**Subject:** Robbins Manufacturing

Project Number:

1190011-004-AC

Receipt Date: Response Due Date: 7/15/2004 7/31/2004

Existing Permit No.:

1190011-002-AO, 003-AC

Assigned Inspector:

**Bob Soich** 

Last Facility Inspection (ARMS): 3/18/2004

Permit Engineer:

Jim McDonald

We have 4 copy(ies) of the application.

I believe this facility current has an enforcement action ongoing and J.P. is handling it.

Bob, JP, & Sheila, please let the Permit Engineer know by 7/31/04 if you have any changes for the permit, items to add to a potential incompletion letter, or any other concerns you may have with this project.

Thanks

Jason Waters
Air Permitting Supervisor
FDEP Southwest District
813-744-6100 x107

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Jason Waters
Air Permitting Supervisor
FDEP Southwest District
813-744-6100 x107

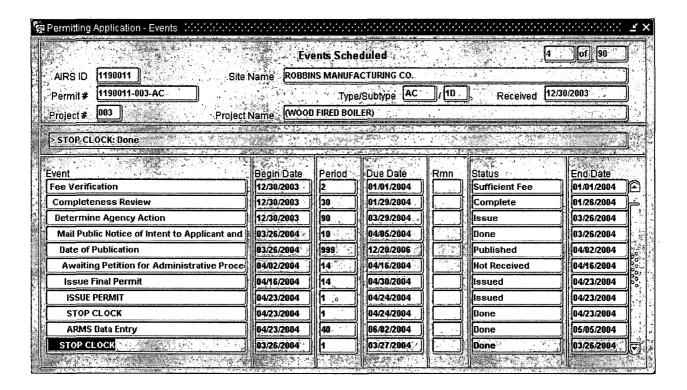
Application Routing and Transmittal Sheet Air Permitting Supervisor - Required Information for Project Setup by Admin Facility ID No.: 1190011 Owner/(Facility Name, if needed): Robbins Manufacturing Company New Facility (Y/N): N Relocatable (Y/N): N Project Description: Add new wood-fired boiler Project Name: Wood-fired boiler Type/Subtype: ac1d Received: 12/15/03 Should Be \$ 2000 Overide Reason (if needed): Fee Submitted: correct incorrect Fee Checked By: dh Submitted \$ 1000 Needed/Refund \$ 1000 Date: 12/17/2003 Admin - Project Setup Information Project No.: 003 Initial ARMS Entry (Initials & Date): Virus Scan Date: Air Permitting Supervisor - Application Information Application Assigned To: Date: Confidential Information (Y/N): N No. of Hardcopies: 2 No. of Disks: na Application Distribution (hardcopy/disk): DEP Engineer: County: Other: Air Permitting - Permit Transmittal (add initials & date completed) Day 30/60/902 Permit No.: Final Draft 250 Project No.: Engineer → permit supervisor C/E Review Y/N Permit supervisor → DAPA eyp 4/10/2005 DAPA → clerk/engineer Permit Package Mailed/Emailed ARMS Events Entry en 002 Air Permitting Supervisor - Data Fields for Access System (add at final issuance) Permit No.: 1190011-003 AL Issue Date: Engineer: Facility Description: Wood Products Source Description: Boiler 296: NSPS: Fuels: W, 19 Control Equipment: Project Description/Comments:

Air Permitting - System Updates (add initials & date completed) Engineer - Final Permit Copied (read only) to Air Common\Permits\PermitXX\ Permitting Supervisor - Permit to be posted on DARM website? (Y/N) \* Posted by/date: Engineer - ARMS Inventory Data Entry: Permitting Clerk - Permit List Data Entry (Access): 4-23-04/2 Permitting Supervisor – Send permit to compliance section? (Y/N) N Permitting Supervisor - Copy of transmittal sheet to Nancy Knight (new facility)? (Y/N) N Permitting Supervisor - Copy of Permit/Intent to Party of Interest? (Y/N) N

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002	260HP HURST FIREBOX STEAM	

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#### **MEMORANDUM**

TO:

Gerald J. Kissel, P.E.

**DATE:** 4/16/04

District Air Program Administrator

THROUGH:

Jason Waters

Air Permitting Supervisor, SWD

FROM:

Danielle Henry, Air Permitting Engineer

**SUBJECT:** 

Company:

Robbins Manufacturing Company

Permit No:

1190011-003-AC (Final Issuance)

County:

Sumter

Project:

Construction of new wood fired boiler

Default Date (Day 90): N/A

The Intent to Issue Public Notice for the above permit was published on 4/2/04. I have reviewed the proof of publication and verified that the correct notice was published.

I recommend issuance of this final construction permit which is identical to the draft permit approved by this office as part of the notice of Intent to Issue package.



# Department of **Environmental Protection**

leb Bush Governor

Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

David B. Struhs Secretary

P.E. Certification Statement

Permittee:

Robbins Mfg. wood-fired boiler

Permit No.: 1190011 - 003-AC

**Project type:** 

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

Registration Number:

Permitting Authória FDEP Southwest District-3804 Coconut Palm Drive

Tampa, FL 33619 813/744-6100 Ext 116

Fax: 813/744-6458

#### MEMORANDUM

DATE: 3/25/04

TO:

Gerald J. Kissel, P.E.

District Air Program Administrator

THROUGH:

Jason Waters TV

Air Permitting Supervisor, SWD

FROM:

Danielle Henry, Air Permitting Engineer

SUBJECT:

Company:

Robbins Manufacturing Company

Permit No:

1190011-003-AC (Intent to Issue)

County:

Sumter

Project:

Construction of new wood fired boiler

Default Date (Day 90): March 29, 2004

From the information below, I recommend that the Intent to Issue for Robbins Manufacturing Company be signed.

On December 15, 2003, the Department received a construction permit application from Robbins Manufacturing Company for the construction of a new wood fired boiler (260HP Hurst Firebox Steam Boiler). The maximum heat input to the boiler is 13.1 MMBTU/hour, based on a maximum wood firing rate of 1,875 lbs of wood/hour with the wood having a BTU value of 7,000 BTU's/pound. The new boiler will be added in an effort to improve production and be used in line with the existing Abco Industries 72' x 20' wood fired boiler (EU 001 which is also a 260HP boiler with a maximum heat input rate of 13.1 MMBTU/hour currently permitted under 1190011-002-AO). The new boiler will eventually replace the declining Abco Industries 72' x 20' wood fired boiler (EU 001). The new wood boiler emissions are controlled by a Hurst Multicyclone Collector with a design flow rate of 6650 ACFM.

The new boiler is subject to 40 CFR 60, Subpart Dc, - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and Rule 62-296.410, F.A.C. - Carbonaceous Fuel Burning Equipment. The new emission unit is subject to notifications for commencement of construction and initial start up date because the new unit is above 10 MMBTU/hour but is NOT subject to any emission limitations because the unit is below the 30 MMBTU/hour requirement needed to apply limitations. VE testing is also not required per 40 CFR 60, Subpart Dc but will be required per State Rule and has been incorporated into the permit.

The exempt Hurst Boiler Series 400, 150 Horsepower, fired LP Gas has been included in this Construction Permit. The unit was deemed exempt on October 19, 2001.

The construction also includes permit language for the facility to submit a Title V Air Operation Permit because with the addition of the new boiler the facility-wide CO emissions exceed 100 tpy. The language also includes an option to add permit conditions to the facility such as limiting the hours of operation to avoid Title V applicability. The permit language requires them to submit a Construction/Modification Permit. In either case, facility-wide potential emission calculations for all sources have been required to be submitted with the application.

The construction permit application and files were reviewed by Bob Soich of the Air Quality Compliance section and no outstanding compliance issues were noted. Bob performed an inspection the week of March 15, 2004 and discovered the new boiler was already constructed prior to receiving the permit. An enforcement referral is being prepared by Bob and will be sent to Joel Smolen and Sheila Schneider for review.

# TECHNICAL EVALUATION

**AND** 

### PRELIMINARY DETERMINATION

FOR

# **Robbins Manufacturing Company**

Tarrytown

Sumter County

**Construction Permit** 

1190011-003-AC

Florida Department of Environmental Protection

Southwest District

Tampa, FL

March 25, 2004

Prepared by: Danielle D. Henry

#### I. <u>Project Description:</u>

#### A. Applicant: (Authorized Rep)

Mr. Jerome G. Robbins, II, Vice President and Secretary Robbins Manufacturing Company 13001 North Nebraska Avenue Tampa, Florida 33612

#### B. Engineer:

Mr. Cory A. Houchin Environmental Sciences Group, Inc. Post Office Box 7495 Tampa, FL 33673

#### C. Project and Location:

The applicant is requesting permission to construct a new wood fired 260HP Hurst Firebox Steam Boiler. The facility is located at 13904 State Route 471, Tarrytown, Sumter County.

#### D. Process and Controls:

The maximum heat input to the boiler is 13.1 MMBTU/hour, based on a maximum wood firing rate of 1,875 lbs of wood/hr. with the wood having a BTU value of 7,000 BTU's/pound. This new boiler will be used in line with the existing Abco Industries 72' x 20' wood fired boiler (EU 001 which is also a 260HP boiler with a maximum heat input rate of 13.1 MMBTU/hour) in an effort to improve production. The new boiler will eventually replace the declining Abco Industries 72' x 20' wood fired boiler (EU 001). The new wood boiler emissions are controlled by a Hurst Multicyclone Collector with a design flow rate of 6650 ACFM.

#### **Emission Unit ID & Description**

002 – Hurst Firebox Steam Boiler

# E. Application Information:

Received on: December 30, 2003

Deemed complete on: January 26, 2004

# II. Rule Applicability

This project <u>is</u> 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
Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or	
Nonattainment Requirements, F.A.C. <sup>1</sup>	Y
Rule 62-212.400, Prevention of Significant Deterioration, F.A.C <sup>2</sup>	N
Rule 62-296.320, General Particulate Emission Limiting Standards, F.A.C <sup>3</sup>	Y
Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C <sup>4</sup>	Y
Rule 62-296.400, Stationary Source Emission Standards, F.A.C <sup>5</sup>	Y
Rule 62-296.500, Reasonably Available Control Technology (VOC) <sup>6</sup>	N
Rule 62-296.700, Reasonably Available Control Technology (PM) <sup>7</sup>	N
Rule 62-204.800, Standards of Performance for New Stationary Sources, F.A.C. <sup>8</sup>	Y
(NSPS)	!
Rule 62-204.800, National Emission Standard for Hazardous Air Pollutants, F.A.C. <sup>9</sup>	N
(NESHAPS)	
Chapter 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C. <sup>10</sup>	N
Rule 62-297.310, General Compliance Test Requirements, F.A.C. <sup>11</sup>	Y

- 1. not exempt from general permitting requirements
- 2. facility is PSD minor
- 3. wood fired boiler could be a source of unconfined particulate matter emissions
- 4. wood fired boiler is a source of VOC and odors
- 5. this is a source category (Rule 62-296.410)
- 6. the facility is not in a designated ozone attainment area
- 7. the facility is not in a particulate matter air quality maintenance area
- 8. the new boiler is subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and Rule 62-296.410, F.A.C. Carbonaceous Fuel Burning Equipment.
- 9. facility is minor for HAPs
- 10. facility is a non-Title V source
- 11. VE testing is required

#### III. Summary of Emissions

Visible emissions: An opacity not greater than 20% except for one two-minute period per hour during which visible emissions shall not exceed 40% opacity is allowed.

#### Pollutants:

		Emissions		
Pollutants Emitted	Current Emission Unit 001 (Actual Emissions from 1995 AOR)	New Emission Unit 002 (Potential Emissions per Construction Application *)	Exempt Gas Boiler ** (Approved on October 19, 2001)	Facility- Wide Totals
	tpy	tpy	tpy ការជាជាជាជាជាជាជាជាជាជាជាជាជាជាជាជាជាជាជ	tpy
PM	28.05	20.0823	0.206	48.338
PM10	28.05	18.36096	0.206	46.617
NO <sub>x</sub>	2.1675	12.62316	2.70	17.491
CO	70.125	34.4268 <b>X</b>	2.27	106.822
$SO_2$	1.275	1.43445	0.016	2.725
VOC	5.4188	0.93	0.149	6.498

The maximum operating hours are 8760 hours/year

According to current calculations, once the new boiler is in operation, this facility is subject to Title V permitting due to the 100 tpy threshold exceedance for CO. The Construction Permit for the new emission unit will require the facility to submit a Title V Application. The Department has included language in the permit to allow the facility to apply for a Construction/Modification to the permit. The facility will have to demonstrate that they can remain below the Title V permit thresholds and limit their emissions from all sources to avoid Title V permitting. Facility-wide emissions from all sources are required in the air operation application to ensure the proper permit is applied.

#### IV. Conclusions

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

\* next permitting action, we should reconcile the fact that actuals for old boiler are 70 & potential for new boiles is 34?? - JR 10/25/04

<sup>\*</sup> AP 42 Table 1.6-1, 1.6-2 & 1.6-3

<sup>\*\*</sup> AP 42 Table 1.4-1 & 1.4-2

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. and 40 CFR 60, Subpart Dc.

# V. Proposed Agency Action

Pursuant to Section 403.087, Florida Statutes and Section 62-4.07, 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).



December 29, 2003

Division of Air Resource Management, Permitting Section Florida Department of Environmental Protection 3804 Coconut Palm Drive Tampa, FL 33619-8318

Permit Modification Application for an Air Pollution Source **Robbins Manufacturing Company** 

Tarrytown, Sumter County

Wood Fired Boiler (Permit No. 119001-001-AO)

Dear Sir/Madam,

Please find enclosed the processing fee of \$2000.00 according to your correspondence dated December 18, 2003 to cover the process of our application.

If you have any further questions or concerns, please contact me at 971-3030 or jrobbins@robbinslumber.com.

Sincerely,

**Robbins Manufacturing Company** 

Jerome G. Robbins, II

Enclosures: (1)

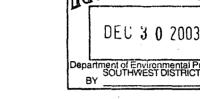


# Department of Environmental Protection

Jeb Bush Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

December 18, 2003

David B. Struhs Secretary



ROBBINS MANUFACTURING PO BOX 17939 TAMPA FL 33682

Dear Sir/Madam:

Your check number 343264 for \$1,000.00, is being returned for the following reason(s):

- \*Insufficient Fee. The correct fee is \$ 2000.00
- \*Certified Receipt #\_\_7002 3150 0003 8463 0826
- \*If you want to have the application processed, you must submit the proper fee within ten days of receipt of this letter. If the correct fee is not received within this period, DEP is required by law not to process the application and to return it to you.
  - \*Enclosed is a copy of the fee schedule.

Checks should be made payable to the Department of Environmental Protection.

For more program specific information, please contact the following:

Danielle Henry Phone: (813) 744-7100

Department of Environmental Protection Southwest District Office 3804 Coconut Palm Drive Tampa FL 33619

Sincerely,

Sandra Wilson

Department of Environmental Protection

andra 112 lacon

RCT Ret R/ 5929

Enclosure(s)

"More Protection, Less Process"







Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

Department of

**Environmental Protection** 

David B. Struhs
Secretary

December 18, 2003

ROBBINS MANUFACTURING PO BOX 17939 TAMPA FL 33682

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Department of Environmental Protection Southwest District Office ` 3804 Coconut Palm Drive Tampa FL 33619

Sincerely,

Sandra Wilson

Department of Environmental Protection

andra Wilson

RCT Ret R/ 5929

Enclosure(s)

"More Protection, Less Process"

Printed on recycled paper.