

Application Routing and Transmittal Sheet

<b>Air Permitting Supervisor - Required Information for Project Setup by Admin</b>		
Owner/(Facility Name, if needed): Robbins Manufacturing Company		Facility ID No.: 1190011
New Facility (Y/N): N	Relocatable (Y/N): N	Project Description: Modify 2 Boilers, Utilization
Project Name: Modify 2 Boilers		
Type/Subtype: acm1	Received: 7/15/04	
Fee Submitted: <input checked="" type="checkbox"/> correct <input type="checkbox"/> incorrect <input type="checkbox"/> na	Should Be \$ 250	Override Reason (if needed):
Fee Checked By: jw	Submitted \$ 250	250 + 4750 = 5,000
Date: 7/19/04	Needed/Refund \$ 0	

<b>Admin - Project Setup Information</b>		
Project No.: 004	Initial ARMS Entry (Initials & Date): RJ 7/29/04	Virus Scan Date: na

<b>Air Permitting Supervisor - Application Information</b>		
Application Assigned To: jm		Date: 7/19/04
No. of Hardcopies: 2	No. of Disks: na	Confidential Information (Y/N): N
Application Distribution (hardcopy/disk): DEP Engineer: 2 County: na Other:		

Air Permitting - Permit Transmittal (add initials & date completed)			Day (30/60/90):
Permit No.:	Intent/ Draft	Final	5/14/04 / 10/13/04
Project No.:			
Engineer → permit supervisor	11-29-04 gm	1-4-05 gm	C/E Review Y/N
Permit supervisor → DAPA	11/30/04 gm	1/4/05 gm	Y
DAPA → clerk/engineer	12/3/04	1/7/05	
Permit Package Mailed/Emailed	12/6/04	1/10/05	
ARMS Events Entry	12/6/04	1/10/05	

2-1-05

<b>Air Permitting Supervisor - Data Fields for Access System (add at final issuance)</b>		
Permit No.:	Issue Date:	Engineer:
Facility Description: Wood Products	Source Description: Boilers	
296:	MACT:	NSPS: Dc
Fuels: w, na	Control Equipment: cyclone	
Project Description/Comments: Sawmill, boilers, kiln, silo		

<b>Air Permitting - System Updates (add initials &amp; date completed)</b>		1190011.004.AC.F.ROBBINS.210
Engineer - Final Permit Copied (read only) to Air Common\Permits\PermitXX\		1190011.004.AC.F.ROBBINS.DOC
Permitting Supervisor - Permit to be posted on DARM website? (Y/N)	<input checked="" type="checkbox"/>	Posted by/date: DRAFT POSTED 12/8/04
Engineer - ARMS Inventory Data Entry: 12-29-04 gm		FINAL "i" 01/10/05
Permitting Clerk - Permit List Data Entry (Access):	1/10/05	
Permitting Supervisor - Send permit to compliance section? (Y/N)	Y	
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	

Cash Receiving Application - Collection Point Log Remittance

Collection Point Log Remittance CRAF006A

AREA: **SWD** Total: **\$250.00**

Remittance: **180351** Type: **CP** Received Date: **07/15/2004** Status: **RECEIVED**

SYS RCPT: **464878** PNR: **PNR** Check #: **354048** Amount: **250.00**

SENFE#: **SENFE#** Name: **ROBBINS MANUFACTURING**

First: **First** Middle: **Middle** Title: **Title** Sur: **Sur**

Address1: **PO BOX 17939** Short Comments: **S-AIR 1190011-004**

Address2: **Address2**

CIM: **TAMPA** ST: **FL** Zip: **33682** Country: **Country**

**PAYMENT(S)**

Payment	Area	Object Code/Description	Payment Amount	Reference #	Applic Fund	Status
<b>633277</b>	<b>SWD</b>	<b>002222 AIR CONSTRUCT</b>	<b>\$250.00</b>		<b>ARM PFTF</b>	<b>COMPLETE</b>

**COMMIT FREQUENTLY** **\$250.00** Payment total

Permitting Application - Permit Detail and Log Permit

**ARMS Facility**

POINT: **POINT** AIRSID: **1190011** STATUS: **A** OFFICE: **SWD** **SW: TAMPA**

SITE NAME: **ROBBINS MANUFACTURING CO.** COUNTY: **SUMTER**

OWNER/COMPANY: **ROBBINS MANUFACTURING CO.**

**Project**

AIR Permit #: **AIR PERMIT #** Project #: **004** GRA Reference #: **108673**

Permit Office: **SWD (DISTRICT)** Agency Action: **Pending**

Project Name: **MODIFY 2 BOILERS** Desc: **modify 2 boilers, utilization**

Type/Sub/Des: **AC IM1 Minor Modification** Logged: **07/20/2004**

Received: **07/15/2004** Issued: **Issued** Expires: **Expires** OGC: **OGC**

Fee: **250.00** Fee Read: **250.00** Del: **Del** Override: **NONE**

**Related Party**

Role: **APPLICANT** Begin: **07/20/2004** End: **End**

Name: **HOUGHIN, CORY A.** Company: **ENVIRONMENTAL SCIENCES GROUP**

Address: **P.O. BOX 7495**

City: **TAMPA** State: **FL** Zip: **33603** Country: **Country**

Phone: **813-930-9074** Fax: **813-935-1167**

**Processors**

Processor: **MCDONALD J** Active: **07/20/2004** Inactive: **Inactive** Events: **Events**





### Collection Point Log Remittance

AREA: **SWD** Total: **CRAF008A**  
\$66,299.94

Remittance: **591360** Type: **CP** Received Date: **11/03/2004** Status: **RECEIVED**

SYSRCPT: **474763** PNR:  Check #: **054373** Amount: **250.00**

SSNFE#:  Name: **JONES EDWARDS & ASSOCIATES INC**

First:  Middle:  Title:  Sur:

Address1: **738 HE WALDO ROAD** Short Comments:

Address2: **BUILDING A** **AIR 1198011-004**

City: **GAINESVILLE** ST: **FL** Zip: **32641** Country:

PAYMENT(S)							
Payment#	Distr	CL	Object	Payment	Reference#	Applic/	status
	Area		Code/Description	Amount		Fund#	
<b>616545</b>	<b>SWD</b>		<b>602222 AIR CONSTRUCT</b>	<b>250.00</b>		<b>ARRA INT</b>	<b>COMPLETE</b>

COMMIT FREQUENTLY \$250.00 Payment total



### ARMS Facility

POINT:  AIRS ID: **1198011** STATUS: **A** OFFICE: **SWD** SW: **TAMPA**

SITE NAME: **ROBBINS MANUFACTURING CO.** COUNTY: **SUMTER**

OWNER/COMPANY: **ROBBINS MANUFACTURING CO.**

**Project**

AIR Permit #:  Project #: **004** CRA Reference #: **186673**

Permit Office: **SWD (DISTRICT)** Agency Action: **Pending**

Project Name: **MODIFY 2 BOILERS** Desc: **modify 2 boilers, utilization**

Type/Sub/Des: **AC / 00** Multiple Sources per Application:  Logged: **07/20/2004**

Received: **07/16/2004** Issued:  Expires:  OGC:

Fee: **5250.00** Fee Recd: **5250.00** Date:  Override: **MULTIPLE SOURCE**

**Related Party**

Role: **APPLICANT** Begin: **07/20/2004** End:

Name: **HOUGHIN, CORY A.** Company: **ENVIRONMENTAL SCIENCES GROUP**

Address: **P.O. BOX 7495**

City: **TAMPA** State: **FL** Zip: **33603** Country:

Phone: **813-930-9074** Fax: **813-935-1167**

**Processors**

Processor: **MCDONALD\_J** Active: **07/20/2004** Inactive:  Events:



Events Scheduled

58 of 90

AIRS ID: 1190011 Site Name: ROBBINS MANUFACTURING CO.  
 Permit #: 1190011-004-AC Type/Subtype: AC / 00 Received: 07/15/2004  
 Project #: 004 Project Name: (MODIFY 2 BOILERS)

> STOP CLOCK: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Awaiting Additional Information	10/19/2004	45	12/03/2004		Received	11/03/2004
Completeness Review	11/03/2004	30	12/03/2004		Complete	11/03/2004
Determine Agency Action	11/03/2004	90	02/01/2005		Issue	12/06/2004
Mail Public Notice of Intent to Applicant an	12/06/2004	10	12/16/2004		Done	12/06/2004
Date of Publication	12/06/2004	999	09/01/2007		Published	12/11/2004
Awaiting Petition for Administrative Pro	12/11/2004	14	12/25/2004		Not Received	12/25/2004
Issue Final Permit	12/25/2004	14	01/08/2005		Issued	01/10/2005
ISSUE PERMIT	01/10/2005	1	01/11/2005		Issued	01/10/2005
STOP CLOCK	01/10/2005	1	01/11/2005		Done	01/10/2005
ARMS Data Entry	01/10/2005	40	02/19/2005		Done	01/10/2005
STOP CLOCK	12/06/2004	1	12/07/2004		Done	12/06/2004



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

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Permitting Application - Permit Detail and Log Permit									
<b>ARMS Facility</b>									
POINT	AIRSID	1190011	STATUS	A	OFFICE	SWD	SW: TAMPA		
SITE NAME		ROBBINS MANUFACTURING CO.			COUNTY		SUMTER		
OWNER/COMPANY		ROBBINS MANUFACTURING CO.							
<b>Project</b>									
AIR Permit #	1190011	-	004	-	AC	Project #	004	CRA Reference #	188673
Permit Office	SWD(DISTRICT)				Agency Action	Issued			
Project Name	MODIFY 2 BOILERS			Desc	modify 2 boilers, utilization				
Type/Sub/Des	AC	/	00	Multiple Sources per Application				Logged	07/20/2004
Received	07/15/2004		Issued	01/10/2005		Expires	03/10/2006		OGC
Fee	5250.00		Fee Recd	5250.00		Dele			Override
<b>Related Party</b>									
Role	APPLICANT			Begin	07/20/2004		End		
Name	ROBBINS, JEROME G. III				Company	ROBBINS MANUFACTURING COMPANY			
Address	P.O. BOX 17939								
City	TAMPA			State	FL		Zip	33682	
Phone	813-971-3030		Fax	813-972-3980					
<b>Processors</b>									
Processor	MCDONALD_J			Active	07/20/2004		Inactive		
								<b>Events</b>	



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Emission Unit Details	
EU No	Description
001	WOOD FIRED BOILER
002	260HP HURST FIREBOX STEAM
003	KILN NO. 1
004	KILN NO. 2 (SOUTHWEST)
005	SAWDUST STORAGE SILO
006	PLANER SHAVINGS STORAGE B



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## Permit Summary Application Search

[Help](#)

Enter AIRS ID:

**Owner:** ROBBINS MANUFACTURING CO.  
**Site Name:** ROBBINS MANUFACTURING CO.  
**Street:** SR 50 AND SR 471  
**Title V:** N **County:** SUMTER  
**City:** TARRYTOWN **Zip Code:**  
**Major Group SIC:** 28 -- CHEMICALS AND ALLIED PRODUCTS

### Update Existing Permit Summary Records:

Permit Number	Permit Activity	Date Received	Agency Action
1190011-004-AC	Construction	7/15/2004	Issued - 1/10/2005
<b>Project Name:</b> MODIFY 2 BOILERS			<a href="#">Add</a> <a href="#">Rev</a> <a href="#">Draft</a>
<b>Primary Processor:</b> MCDONALD J			
Update--> <a href="#">Final</a>			
Update--> <a href="#">Draft</a>			

### Select Project in PA to Create a New Permit Summary:

Permit Number	Permit Activity	Date Received	Agency Action
1190011-003-AC	CONSTRUCTION	12/30/2003	Issued - 4/23/2004 <a href="#">Create Summary</a>
1190011-002-AO	OPERATION	7/5/2001	Issued - 7/27/2001 <a href="#">Create Summary</a>

You are logged on as PRICKETT\_P with Security Level 70





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Facility ID  Owner/Facility Name

Project Number  Issued  Eng

Facility Descriptio

Source Description

296  MACT  NSPS

Fuel  Primary Control Equipment

For fuels: ng=natural gas; lg=landfill gas; p=propane; t=tires; uo=used oil; w=wood; c=coal; list allowed fuel oils as a string of #s (ex. 23456)

Project Description/Comment

To add Owner/  
Facility, click below

Add Owner/Facility

To see 296,  
MACT, or NSPS  
codes, click below

296 List

MACT List

NSPS List

Save Record

MEMORANDUM

TO: Jason Waters *JW*

FROM: Jim McDonald *JM*

DATE: January 4, 2005

SUBJECT: Recommend permit 1190011-004-AC for the Robbins Manufacturing Company  
be issued.

I recommend permit 1190011-004-AC for the Robbins Manufacturing Company be issued.

There have been no changes to the permit as it was originally proposed with the Intent to Issue.

The public notice was properly published on December 11, 2004, as required and as of this date no comments have been received.

This facility was referred for enforcement for  
construction w/o a permit. *JW*



**Air Resource  
Information**

DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

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## Permit Summary Application Search

[Help](#)

Enter AIRS ID:

**Owner:** ROBBINS MANUFACTURING CO.  
**Site Name:** ROBBINS MANUFACTURING CO.  
**Street:** SR 50 AND SR 471  
**Title V:** N **County:** SUMTER  
**City:** TARRYTOWN **Zip Code:**  
**Major Group SIC:** 28 -- CHEMICALS AND ALLIED PRODUCTS

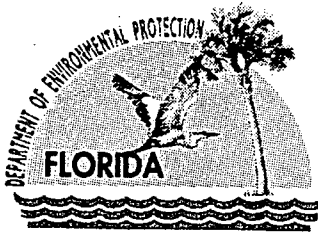
### Update Existing Permit Summary Records:

Permit Number	Permit Activity	Date Received	Agency Action
1190011-004-AC	Construction	7/15/2004	Issue
<b>Project Name:</b> MODIFY 2 BOILERS			<a href="#">Add</a> <a href="#">Rev</a> <a href="#">Draft</a>
<b>Primary Processor:</b> MCDONALD_J			<a href="#">Add</a> <a href="#">Final</a>
Update--> <a href="#">Draft</a>			

### Select Project in PA to Create a New Permit Summary:

Permit Number	Permit Activity	Date Received	Agency Action
1190011-003-AC	CONSTRUCTION	12/30/2003	Issued - 4/23/2004 <a href="#">Create Summary</a>
1190011-002-AO	OPERATION	7/5/2001	Issued - 7/27/2001 <a href="#">Create Summary</a>

You are logged on as PRICKETT\_P with Security Level 70



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Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

## P.E. Certification Statement

Permittee:

*Robbins Mfg*

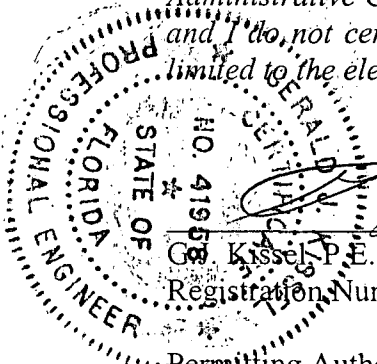
Permit No.:

*1190011-004-AC*

Project type:

*modify 2 boilers*

*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).*



*[Signature]*  
\_\_\_\_\_  
G. Kissel, P.E. Date *12/3/04*

Registration Number: 41958

Permitting Authority:  
FDEP Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619  
813/744-6100 Ext 116  
Fax: 813/744-6458

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MEMORANDUM

TO: Jason Waters

FROM: Jim McDonald *Jm*

DATE: November 29, 2004

SUBJECT: Recommend the Intent to Issue for Robbins Manufacturing Company be signed.  
DEP File No. 119011-004-AC

From the information below, I recommend the Intent to Issue for Robbins Manufacturing Company be signed. Day 90 is February 1, 2005.

On July 15, 2004, the Department received from the Robbins Manufacturing Company an air pollution construction modification permit application for 2 wood fired boilers, the after-the-fact construction of a Sawdust Storage Silo, Planer Shavings Storage Silo, Kiln No. 1, and the construction of a new Kiln No. 2 at Chip and Saw facility located at S.R. 50 and Route 471, Tarrytown, Sumter County.

The modifications are for the following:

1. Change the maximum heat input to each boiler from based on a monthly average to a daily average.
2. Change recordkeeping requirements to demonstrate compliance with No. 1 above.
3. Page 7 of 7 in construction permit 1190011-003-AC determined this facility is a Title V facility, based on an error in how the carbon monoxide emissions were determined. Therefore, this permit changes the Title V status of the facility to a ~~natural~~ non-Title V facility. *based on control of particulate emission* *SYNTHETIC*

Sheila Schneider (11/29/04), Jon-Paul Pouso (11/24/04), and Bob Soich (11/24/04) stated to me that they have no objections to this permit being issued.

*This situation has been referred for enforcement.*  
*-JK 12/3/04*



TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION  
FOR

Robbins Manufacturing Company

Sumter County

Construction Permit Application Number

1190011-004-AC

Florida Department of Environmental Protection

Southwest District

Tampa, FL

November 22, 2004

Prepared by: Jim McDonald

I. Project Description:

A. Applicant:

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

Mr. Jerome G. Robbins  
Vice President

B. Engineer:

Mr. Frank Darabi, P.E.  
Darabi & Associates, Inc.  
730 NE Waldo Road, Building A  
Gainesville, FL 32641

C. Project and Location:

The applicant proposes the construction modification of 2 wood fired boilers, the after-the-fact construction of a Sawdust Storage Silo, Planer Shavings Storage Silo, Kiln No. 1, and the construction of a new Kiln No. 2 at Chip and Saw facility located at S.R. 50 and Route 471, Tarrytown, Sumter County.

D. Process and Controls:

The applicant is requesting permission for the construction modification of 2 boilers, the after-the-fact construction of Kiln No. 1, the construction of Kiln No. 2, the after-the-fact construction of a Sawdust Storage Silo serving the Hurst boiler, and the after-the-fact construction of a Planer Shavings Storage Bin. These emission units/activities are located at a synthetic non-Title V Chip and Saw (sawmill) facility based on control of particulate emissions.

The modifications for the 2 wood fired boilers are as follows:

1. Change the maximum heat input to each boiler from based on a monthly average to a daily average.
2. Change recordkeeping requirements to demonstrate compliance with No. 1 above.
3. Page 7 of 7 in construction permit 1190011-003-AC determined this facility is a Title V facility, based on an error in how the carbon monoxide emissions were determined. Therefore, this permit changes the Title V status of the facility to a synthetic non-Title V facility.

The air emission sources at this facility are as described below:

**Emission Unit ID No. 001 – Abco Industries boiler (west)**

For the construction modification of an existing 260 HP Abco Industries 72' x 20' wood (wood chips) fired boiler, currently permitted on Permit No. 1190011-002-AO. 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 existing Kiln No. 1 (northeast) and/or the new Kiln No. 2 (southwest). This boiler is located to the west of the Hurst boiler - Emission Unit ID No. 002.

**Emission Unit ID No. 002 – Hurst boiler (east)**

For the construction modification 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 a 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 existing Kiln No. 1 and/or the new Kiln No. 2. This boiler is located to the east of the Abco boiler - Emission Unit No. 001.

**Emission Unit ID Nos. 001 & 002 Information Summary**

Both boilers are 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.

**Emission Unit ID No. 003 – Kiln No. 1 (northeast - existing)**

Kiln No. 1 is located to the northeast of the proposed new Kiln No. 2. This kiln is used to dry wood, which consists of lumber and/or poles at a maximum rate of 21,600 Mbf (thousand board feet) per any consecutive 12 month period. The typical maximum charge to the kiln is 138 Mbf/charge. Heat to the kiln is supplied by any combination of 3 boilers. The 3 boilers are the Abco Industries boiler (Emission Unit ID No. 001), the Hurst boiler (Emission Unit ID No. 002), and an exempt from permitting 150 HP Hurst, Series 400, boiler fired with LP gas at maximum heat input rate of 6.3 MMBTU/hr. (see the list of Exempt Emission Sources below).

**Emission Unit ID No. 004 – Kiln No. 2 (southwest – new)**

Kiln No. 2 will be located to the southwest of Kiln No. 1. This kiln is used to dry wood, which consists of lumber and/or poles at a maximum rate of 24,000 Mbf per any consecutive 12 month period. 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.

**Emission Unit ID No. 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 rate of 5.42 tons/hr. (daily average) and 39,566 tons per any consecutive 12 month period. Emissions from filling the silo are controlled by a cyclone with a design airflow rate of 27,500 acfm.

**Emission Unit ID No. 006 – Planer Shavings Storage Bin**

Wood shavings are transferred pneumatically from the planer to the Planer Shavings Storage Bin at a maximum rate of 112 tons/hr. (daily average) and 40,880 tons per any consecutive 12 month period. Emissions from filling the bin are controlled by a cyclone with a design airflow rate of 16,500 acfm.

E. Application Information:

Received on: July 15 & September 30, 2004

Information Requested: August 12 & October 19, 2004

Additional Information Submitted: September 30 and November 3, 2004

Application Complete: November 3, 2004

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.).

The location of this project is outside the Hillsborough and Pinellas County ozone air quality maintenance area.

This project is not subject to the Title V permitting requirements of Rule 62-213, F.A.C., since emissions are naturally below the Title V permitting thresholds.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since the source is minor by state definition.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since the project is not exempt from general permitting requirements.

The 2 boilers are subject to the requirements of Rule 62-296.400, Specific Emission Limiting and Performance Standards, F.A.C., since Rule 62-296.410, F.A.C. for Carbonaceous Fuel Burning Equipment is applicable.

This project is subject to the requirements of Rule 62-296.320(4), General Particulate Emission Limiting Standards, F.A.C., since the project is a source of particulate matter emissions.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since it is a source of odors.

The 2 boilers are subject to the requirements of Rule 62-204.800(8), Standards of Performance for New Stationary Sources, F.A.C. regarding 40 CFR 60, Subpart Dc – Small Industrial-Commercial-Institutional Steam Generating Units.

This project is not subject to the requirements of Rule 62-204.800(9), Emission Guidelines and Compliance Times, F.A.C. regarding 40 CFR 60, Subpart C, since there is no source category.

This project is not subject to the requirements of Rule 62-204.800(10), National Emission Standard for Hazardous Air Pollutants, F.A.C. regarding 40 CFR 61, since there is no source category.

This project is not subject to the requirement of Rule 62-204.800(11), National Emission Standard for Hazardous Air Pollutants, F.A.C. regarding 40 CFR 63, since the facility is naturally minor for HAPs.

### III. Summary of Emissions

Visible Emissions: From the boilers shall not exceed 20% opacity except for one two-minute period per hour during which visible emissions shall not exceed 40% opacity. The other activities at the facility shall not emit visible emissions that are equal to or exceed 20% opacity.

Testing visible emissions from the 2 boilers shall be in accordance with DEP Method 9. If special testing of the other activities at the facility are required, testing shall be in accordance with EPA Method 9.

There shall be no objectionable odors.



	Abco Boiler E.U. 001	Hurst Boiler E.U. 002	Exempt Boiler	Kiln No. 1 E.U. 003	Kiln No. 2 E.U. 004	Sawdust Silo E.U. 005	Shavings Bin E.U. 006	Facility-Wide Total
Pollut.	Potential TPY	Potential TPY	Potential TPY	Potential TPY	Potential TPY	Potential TPY	Potential TPY	Potential TPY
PM	20.1	20.1	0.2			8.75	8.75	57.9
PM <sub>10</sub>	18.4	18.4	0.2			8.75	8.75	54.5
NO <sub>x</sub>	12.6	12.6	2.7					27.9
CO	34.5	34.5	2.3					71.3
SO <sub>2</sub>	1.4	1.4	0.0					2.8
VOC	1.0	1.0	0.2	37.8	42.0			82

#### IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapter 62-296, 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 62-297, F.A.C.

#### V. Proposed Agency Action

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).

**McDonald, Jim**

---

**From:** Bruce Lee [blee@robbinlumber.com]  
**Sent:** Tuesday, October 26, 2004 11:54 AM  
**To:** McDonald, Jim  
**Subject:** RE: Air Permit - Incompleteness letter  
**Importance:** High

Thanks for the email.  
For reference address is:  
Robbins Mfg  
13904 SR 471  
Tarrytown, FL 33597

blee

-----Original Message-----

**From:** McDonald, Jim [mailto:Jim.McDonald@dep.state.fl.us]  
**Sent:** Tuesday, October 26, 2004 9:58 AM  
**To:** Bruce Lee  
**Subject:** Air Permit - Incompleteness letter

Bruce, I tried mailing the attached incompleteness letter to you at the address which was in the application and it was returned to the Department.

10/27/2004



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

October 19, 2004

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

Dear Mr. Robbins:

Re: Application dated September 28, 2004  
Reference Permit No. 1190011-003-AC  
DEP File No. 1190011-004-AC

On September 30, 2004, the Department received your air pollution construction modification permit application/additional information for your Chip and Saw (sawmill) facility located in Tarrytown, Sumter County. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. On page 12 of the application the airflow value of 9,405 acfm is shown, whereas on page 13 of the application the airflow value of 6,650 acfm is shown. Which value is correct?
2. No. 5 on page 14 and page 27 of the application shows the value 8,234.4 tons of wood burned per year. Should the value be 8,212.5 (1875 divided by 2000 times 8760)?
3. Should the "maximum process rate" on page 38 of the application show 21,600 Mbf/year?
4. What is the height of Kiln No. 1 (existing) in feet? Should this height be shown as the "Nonstack Emission Point Height" on page 39 of the application or should there be a Stack Height value in feet and other associated stack parameters, since Kiln No. 1 has 6 exhaust vents?
5. Since both kilns are indirectly fired, should the VOC emission factor be 3.5 lbs. of VOC/Mbf, instead of 3.8 lbs. of VOC/Mbf as shown on page 41 and page 50 of the application? If yes, re-submit these pages since the calculated VOC emissions would be less than the emission values shown.

Page 1 of 3

"More Protection, Less Process"

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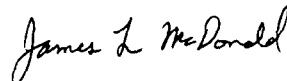
6. Should the "maximum process rate" on page 47 of the application be 24,000 Mbf/yr.? Will this process rate consist of lumber and poles?
7. What is the height of the proposed new Kiln No. 2 in feet? Should this height be shown as the "Nonstack Emission Point Height" on page 48 of the application or should there be a Stack Height value in feet and other associated stack parameters, since Kiln No. 2 is intended to have multiple exhaust vents? How many exhaust vents will there be?
8. How is the amount of Mbf per charge rate (Mbf/charge) to each kiln determined and recorded? What is the maximum charge (Mbf/charge) to each kiln?
9. Regarding page 56 of the application, what is the maximum process rate (loading rate to the bin/silo) in tons/hr. for the Boiler Storage Silo and the Planer Shavings Storage Bin? How are these rates determined and documented/recorded? Be sure this information is also addressed on page 58 of the application associated with the Source Classification Code (SCC). ? NDYAS
10. Complete page 57 of the application for the Boiler Storage Silo and the Planer Shavings Storage Bin. ?
11. Please submit additional documentation of how the 2.0 lbs./hr. of particulate emissions shown on page 59 of the application was derived/determined?
12. Regarding Attachment A.3. of the application, submit a new updated process flow diagram that shows the Sawdust Storage Bin, Bark Storage Bin, Wood Chip Storage Bin, 3 boilers (separately), Kiln No. 1 (existing), Kiln No. 2 (new), Planer Shavings Bin (shavings for sale), and Boiler Storage Silo (sawdust used as fuel). Be sure the diagram also shows the flow of materials, such as the sawdust for the Boiler Storage Silo is received from the sawmill
13. Explain why the Planer Shavings Storage Bin's truck loadout process is exempt from permitting and not an emission unit, since emissions from filling the bin are controlled with a cyclone.
14. Is it correct that the Wood Chip Storage Bins w/truck loadout, Bark Storage Bin w/truck loadout, and Sawdust Storage Bin w/truck loadout qualify to be exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.?
15. Is it correct that the Boiler Storage Silo stores only sawdust and provides sawdust to only the Hurst boiler, since the ABCO boiler is mechanically feed with wood chips or sawdust?

16. Explain the possible operating scenarios of how heat from the 3 boilers is transferred to the 2 kilns. Your response should include a diagram of how the steam(heat) from the 3 boilers is transferred to the 2 kilns.
17. Each kiln is designed to receive a maximum of 13.1 MMBTU/hr. of heat. Since all 3 boilers at the facility can transfer heat simultaneously to the 2 kilns in any combination and possibly exceed the kilns' heat capacity, explain how you determined and documented total heat to each kiln from each boiler
18. Submit an additional \$250.00 application processing fee (\$250 for the boilers + \$2000 for Kiln No. 1 + \$2000 for Kiln No. 2 + \$1000 for the bin/silo = \$5,250). \$250 was submitted on July 15, 2004 and \$4,750 was submitted on September 30, 2004, which only totals \$5,000.

NOTE - Rule 62-4.050, F.A.C. requires applications of this type must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Therefore, your response to the above requests should be certified by a professional engineer.

Your response should be submitted by November 25, 2004. If you have any questions, please call me at (813)744-6100 extension 106.

Sincerely,



James L. McDonald  
Air Permitting Engineer


cc: Mr. Frank Darabi, P.E.  
Darabi & Associates, Inc.  
730 NE Waldo Road, Building A  
Gainesville, FL 32641

Mr. Bruce Lee, Operations Manager  
Robbins Manufacturing Company  
13904 State Road 471  
Tarrytown, FL 33957



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
3804 COCONUT PALM DR.  
TAMPA, FLORIDA 33619

RETURN TO SENDER UNABLE TO FORWARD

repost	N046J81008209	
	\$00.370	
	10/19/2004	
	Mailed From 33619 00064730	

US POSTAGE

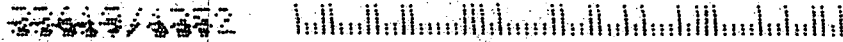
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10-26-04  
jpm*

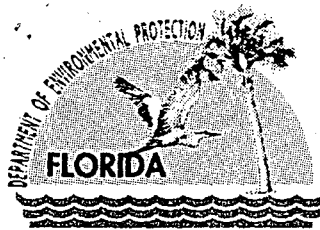
*air*

Mr. Bruce Lee, Operations Manager  
Robbins Manufacturing Company  
13904 State Road 471  
Tarrytown, FL 33957

**RECEIVED**  
OCT 25 2004  
Department of Environmental Protection  
BY SOUTHWEST DISTRICT

Protecting Florida and Your Quality of Life





# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

October 19, 2004

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

Dear Mr. Robbins:

Re: Application dated September 28, 2004  
Reference Permit No. 1190011-003-AC  
DEP File No. 1190011-004-AC

On September 30, 2004, the Department received your air pollution construction modification permit application/additional information for your Chip and Saw (sawmill) facility located in Tarrytown, Sumter County. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.

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Page 1 of 3

"More Protection, Less Process"

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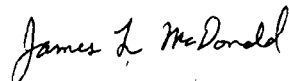
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18. Submit an additional \$250.00 application processing fee (\$250 for the boilers + \$2000 for Kiln No. 1 + \$2000 for Kiln No. 2 + \$1000 for the bin/silo = \$5,250). \$250 was submitted on July 15, 2004 and \$4,750 was submitted on September 30, 2004, which only totals \$5,000.

NOTE - Rule 62-4.050, F.A.C. requires applications of this type must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Therefore, your response to the above requests should be certified by a professional engineer.

Your response should be submitted by November 25, 2004. If you have any questions, please call me at (813)744-6100 extension 106.

Sincerely,



James L. McDonald  
Air Permitting Engineer

cc: Mr. Frank Darabi, P.E.  
Darabi & Associates, Inc.  
730 NE Waldo Road, Building A  
Gainesville, FL 32641

✓ Mr. Bruce Lee, Operations Manager  
Robbins Manufacturing Company  
13904 State Road 471      13907 SR 471  
Tarrytown, FL 33957      WEBSTER, FL 33597

## McDonald, Jim

---

**From:** Kahn, Joseph  
**Sent:** Monday, October 18, 2004 3:35 PM  
**To:** McDonald, Jim  
**Subject:** NCASI Emission Factor

Jim,

I did a quick search on the web for the bulletin you mentioned. Here's a link from Alabama accepting the factor you mentioned: <http://www.adeg.state.ar.us/ftp/root/Pub/WebDatabases/PermitsOnline/Air/0592-AOP-R2-RTC.pdf>. It looks like Georgia accepted an emission factor of 3.60 lb/mBF based on bulletin 718, in a draft permit they issued in 1999 to Union Camp (TV-9438). If you need to contact NCASI, see [www.ncasi.org](http://www.ncasi.org).

Hope this helps.

Joe



**McDonald, Jim**

---

**From:** McDonald, Jim  
**Sent:** Friday, September 24, 2004 10:46 AM  
**To:** 'Brian Storey'  
**Subject:** RE: Robbins Sawmill

I don't have your phone number to discuss, but here are some comments:

The 2 boilers are being processed on a construction (modification) application, you quoted permit type as AFMM, which in an operating permit, instead of for a construction permit.  
The boilers may be OK with the previous \$250.00, since they are already on a construction permit and this is just to modify (with a new construction permit) a previously issued construction permit.

So the total fee looks like \$5000 (4000 + 1000).

If you want to discuss further give me a call.

-----Original Message-----

**From:** Brian Storey [mailto:bstorey@jea.net]  
**Sent:** Friday, September 24, 2004 9:39 AM  
**To:** McDonald, Jim  
**Subject:** Robbins Sawmill

Mr. McDonald:

Just to confirm what we discussed on the phone regarding the above referenced site, here are the emissions I have calculated

1. the combined emissions for any one pollutant for the 2 boilers is greater than 50 tpy, but under 100 tpy (permit type code AFMM)
2. the individual emissions for each kiln will be greater than 25 tpy, but under 50 tpy (permit type code AC1D)
3. the combined emissions for any one pollutant for the 2 silos will be greater than 5 tpy, but under 25 tpy (permit type code AC1E)

In addition:

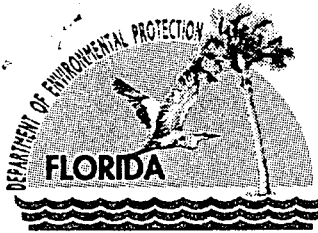
1. for the combined permit modification of the boilers the facility would be required to pay \$1,000 (Rule 62-4.050(4)(a)3b Operation permit for an emissions unit required to measure actual emissions by any method other than stack sampling (such as visible emissions observation or continuous emissions monitoring)
2. for the individual construction permit for the each kiln, the facility would be required to pay \$4,000 (\$2,000/kiln, Rule 62-4.050(4)(a)2c Construction permit for an emissions unit having potential emissions of 25 or more tons per year, but less than 50 tons per year of any single pollutant)
3. for the combined construction permit for the silos, the facility would be required to pay \$ 1,000 (Rule 62-4.050(4)(a)2d Construction permit for an emissions unit having potential emissions of 5 or more tons per year, but less than 25 tons per year, of any single pollutant)

for a subtotal of \$ 6,000, minus the prepaid amount of \$ 250, equaling a final total of \$ 5,750

Thanks for your assistance in confirming this for me,

Brian Storey  
Darabi & Associates

9/24/2004



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

August 12, 2004

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

Dear Mr. Robbins:

Re: Application dated July 13, 2004  
Reference Permit No. 1190011-003-AC  
DEP File No. 1190011-004-AC

On July 15, 2004, the Department received your air pollution construction modification permit application for 2 wood/bark fired boilers located in Tarrytown, Sumter County. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. As discussed during our telephone conversation on August 11, 2004, re-submit your application to address the following:
  - A. The updated heat content of the wood/bark used to fire the boilers.
  - B. The revised (increased) maximum heat input rate to the boilers, in MMBTU/hr., based on daily recordkeeping instead of the current permitted monthly recordkeeping.
  - C. The revised (increased) maximum amount (lbs./hr.) of wood/bark burned in each boiler.
  - D. The revised (increased) maximum total heat input rate to the kiln, in MMBTU/hr.
  - E. Complete an additional Emission Unit Section of the application for the currently un-permitted kiln. {Note, if the proposed enlargement modifications to the kiln are expected to be initiated in near future, your application could also include these modifications, instead of submitting a separate application for the kiln at a later date.}
  - F. Information to support the uncontrolled bark storage silo and wood chip storage silo are both generically exempt from requiring a permit.

Page 1 of 2

*"More Protection, Less Process"*

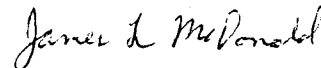
*Printed on recycled paper.*

2. The revised application requested above will require an additional processing fee. Before responding to this letter, please contact Mr. Jason Waters at (813)744-6100 extension 107 for further guidance regarding the proper fee.

NOTE - Rule 62-4.050, F.A.C. requires applications of this type must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Therefore, your response to the above requests should be certified by a professional engineer.

Your response should be submitted by November 12, 2004. If you have any questions, please call me at (813)744-6100 extension 106.

Sincerely,



James L. McDonald  
Air Permitting Engineer

cc: Mr. Cory A. Houchin, P.E.  
Environmental Sciences Group, Inc.  
P.O. Box 7495  
Tampa, FL 33673