# DARABI AND ASSOCIATES, INC.

**Environmental Consultants** 

Bldg. A • 730 NE Waldo Road, Gainesville, Florida 32641 • Phone: 352/376-6533 • Fax: 352/377-3166

November 30, 2005

Mr. James L. McDonald Florida Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619



RE:

Robbins Manufacturing Company

Facility ID Number: 1190011

Response to Request for Additional Information, October 25, 2005

D&A Project No.: 04100-592-01-0100

Dear Mr. McDonald:

On behalf of the above-referenced facility, the following information is provided in response to a letter dated October 25, 2005 from your office. Information is provided in the order requested in the referenced correspondence.

A signed and dated Professional Engineer certification statement has been included with the responses (page 6 of the application).

If there are any questions concerning this matter, please contact Brian Storey at (352) 376-3166, extension 4132.

Sincerely,

Brian A. Storey, E.I

Project Engineer

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Attachments:

Comments and Responses

Corrected Application Pages PE Certification Statement

xc:

Mr. J. Robbins, Vice President, Robbins Manufacturing Company Mr. Bruce Lee, Operations Manager, Robbins Manufacturing Company

Brian Storey, Darabi & Associates, Inc.

# ATTACHMENT 1 RESPONSE TO THE DISTRICT REQUEST FOR ADDITIONAL INFORMATION

## REQUEST No. 1

As discussed with your consultant, Mr. Brian Storey, on October 19, 2005, re-submit pages 56 and 63 of the application, regarding the Sawdust Storage Silo and Planer Shavings Storage Bin. Each of these pages needs to further explain how the tons/hour filling rates (based on a daily average of actual hours of operation) are accurately measured and recorded.

# RESPONSE No. 1

Regarding sawdust generation, in previous submittals and calculations there were difficulties determining a conversion factor from board feet of production at the sawmill to tons of sawdust generated. The difficulty was due to the variability of production numbers at any given time in the day as compared to the known hours of operation at the sawmill during the production. In further discussions with the mill it was noted that the generation of sawdust is directly related to the hours the sawmill operated. That is to say, when the sawmill is operating it is generating sawdust. Therefore, the facility requests that the sawdust generation rate be based on the known filling rate of the storage silo and not based on sawmill board feet production numbers as previously calculated. It is known that the Sawdust Storage Silo takes five hours to fill, and a full silo contains approximately 69.08 tons of sawdust. The hourly sawdust generation rate is therefore 13.82 tons per hour, and the daily sawdust generation rate is 331.58 tons per 24-hour day (potential maximum).

Regarding planer shavings generation, the planer mill is known to produce enough shavings to fill the storage bin in a 10 hour period. One bin full of shavings is known to weigh 56 tons. Therefore the shavings generation rate is 5.6 tons per hour, or 134.4 tons per 24 hour day (potential maximum).

Pages 56 and 63 of the application have been modified and are included as Attachment 2 to this response letter.

### REQUEST No. 2

Re-submit the most recent month of records required by Specific Condition No. C.2. based on your information in No. 1 above.

## RESPONSE No. 2

The sawdust and shavings production records have been included for the month of September as Attachment 3 to this response letter. A sawdust generation rate of 13.82 tons per hour, and 5.6 tons per hour were used respectively.

# REQUEST No. 3

Are the "Actual Sawmill Run Time" and "Actual Planer Mill Run Time" shown in your tables the same actual times that the sawdust storage silo and planer shavings storage bin, respectively, are filed as required by Specific Condition Nos. C.2.B. and C.2.C. in permit 1190011-004-AC.

## RESPONSE No. 3

As mentioned in Response No. 1, and demonstrated in records provided in Response No. 2, the hours of operation shown in the production records correspond directly to the generation of sawdust and shavings. That is to say, when the sawmill is operating there is sawdust being generated and conveyed to storage. Similarly, when the planer mill is operating there is shavings being generated and conveyed to storage.



# Attachment 2

Pages 56 and 63 of DEP Form No. 62-210.900(3)

# **Emissions Unit Control Equipment**

1. Control Equipment/Method Description (limit to 200 characters per device or method):

2. Control Device or Method Code(s): 075

# **Emissions Unit Details**

1.	Package Unit: Manufacturer:	Model Number:	
2.	Generator Nameplate Rating:	MW	
3.	Incinerator Information:		
	Dwell Temperature:		°F
	Dwell Time:		seconds
	Incinerator Afterburner Temperature:		°F

# **Emissions Unit Operating Capacity and Schedule**

- 1. Maximum Heat Input Rate:
- 2. Maximum Incineration Rate:
- 3. Maximum Process or Throughput Rate: 331.68 tpd, 13.82 tph sawdust produced at sawmill
- 4. Maximum Production Rate: 130 Mbf processed at the Sawmill
- 5. Requested Maximum Operating Schedule:

24 hours/day

7 days/week

52 weeks/year

8,760 hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

Approximate Sawdust Storage Silo volume = 628 cu yd

Weight of sawdust 1 cu yd = 220 lbs

Time to fill Sawdust Storage Silo = 5 hours

Quantity of sawdust in full silo =  $(628 \text{ cu yd}) \times (220 \text{ lb/cu yd}) \times (\text{ton/2,000 lb}) = 69.08 \text{ tons}$ 

Hourly Sawdust Storage Silo filling rate = (69.08 tons)/(5 hours) = 13.82 tph

Daily Sawdust Storage Silo filling rate =  $(13.82 \text{ tph}) \times (24 \text{ hr/day}) = 331.58 \text{ tpd}$ 

NOTE: The facility maintains daily records of the sawmill's hours of operation.

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# Emissions Unit Information Section 6 of 6

# **Emissions Unit Control Equipment**

1. Control Equipment/Method Description (limit to 200 characters per device or method):

2. Control Device or Method Code(s): 075

# **Emissions Unit Details**

1.	Package Unit:			
	Manufacturer:	Model Number:		
2.	Generator Nameplate Rating:	MW		
3.	Incinerator Information:			
	Dwell Temperature:		°F	
1	Dwell Time:		seconds	
1	Incinerator Afterburner Temperature:	°F		

## **Emissions Unit Operating Capacity and Schedule**

1.	Maximum Heat Input Rate:		
2.	Maximum Incineration Rate:		tons/day
3.	Maximum Process or Through	put Rate: 134.4 tons per da	y, 5.60 tons per hour
4.	Maximum Production Rate:	250 nlf	
5.	Requested Maximum Operation	g Schedule:	
		24 hours/day	7 days/week
	•	52 weeks/year	<b>8,760</b> . hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

The Planer Mill is known to produce approximately 200 yards of shavings per storage bin. The weight of 100 yards of sawdust is 23 tons; therefore the rate of shavings produced is 56 tons per one bin. The filling of one storage bin with shavings is accomplished in a 10-hour shift. The filling rate is calculated as:

(56 tons/1 fill) \* (1 fill/10 hours) = 5.6 tphMaximum quantity generated in a 24-hr period = (5.6 tph) \* (24 hrs) = 134.4 tpd

NOTE: The facility maintains daily records of the planer mill's hours of operation.

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# Attachment 3

Sawdust and Shavings Production Records for September 2005

Robbins Sawmill Daily Boiler Fuel Usage
Sep-05 EMISSION UNIT NO. 001 ABCO BOILER

Boiler 1	Hrs. Cor	nbustible Fu	el in Boiler	Auger Revolutions				Combustibl	e Fuel Used	Daily Avg. Hourly Heat Input Rate (13.1)
Day	Schd.	Down Time	Run Time	Beginning	Ending	Total		Lbs/Hr	Lbs/day	MMBTU/hr
09/01/05	24.00	0.00	24.00	304621	306981	2360	4.00	393	9,440	2.8
09/02/05	24.00	0.00	24.00	306981	310942	3961	4.00	660	15,844	4.6
09/03/05	24.00	0.00	24.00	310942	317424	6482	4.00	1080	25,928	7.6
09/04/05	24.00	0.00	24.00	317424	323267	5843	4.00	974	23,372	6.8
09/05/05	24.00	0.00	24.00	323267	327395	4128	4.00	688	16,512	4.8
09/06/05	24.00	0.00	24.00	327395	330432	3037	4.00	506	12,148	3.5
09/07/05	24.00	0.00	24.00	330432	332399	1967	4.00	328	7,868	2.3
09/08/05	24.00	0.00	24.00	332399	338389	5990	4.00	998	23,960	7.0
09/09/05	24.00	0.00	24.00	338389	343434	5045	4.00	841	20,180	5.9
09/10/05	24.00	0.00	24.00	343434	349213	5779	4.00	963	23,116	6.7
09/11/05	24.00	0.00	24.00	349213	355852	6639	4.00	1107	26,556	7.7
09/12/05	24.00	0.00	24.00	355852	361164	5312	4.00	885	21,248	6.2
09/13/05	24.00	0.00	24.00	361164	365547	4383	4.00	731	17,532	5.1
09/14/05	24.00	0.00	24.00	365547	368375	2828	4.00	471	11,312	3.3
09/15/05	24.00	0.00	24.00	368375	370428	2053	4.00	342	8,212	2.4
09/16/05	24.00	0.00	24.00	370428	378881	8453	4.00	1409	33,812	9.9
09/17/05	24.00	0.00	24.00	378881	384538	5657	4.00	943	22,628	6.6
09/18/05	24.00	0.00	24.00	384538	388794	4256	4.00	709	17,024	5.0
09/19/05	24.00	0.00	24.00	388794	394001	5207	4.00	868	20,828	6.1
09/20/05	24.00	0.00	24.00	394001	399954	5953	4.00	992	23,812	6.9
09/21/05	24.00	0.00	24.00	399954	406102	6148	4.00	1025	24,592	7.2
09/22/05	24.00	0.00	24.00	406102	412410	6308	4.00	1051	25,232	7.4
09/23/05	24.00	0.00	24.00	412410	417746	5336	4.00	889	21,344	6.2
09/24/05	24.00	0.00	24.00	417746	421875	4129	4.00	688	16,516	4.8
09/25/05	24.00	0.00	24.00	421875	428467	6592	4.00	1099	26,368	7.7
09/26/05	24.00	0.00	24.00	428467	434687	6220	4.00	1037	24,880	7.3
09/27/05	24.00	0.00	24.00	434687	440305	5618	4.00	936	22,472	6.6
09/28/05	24.00	0.00	24.00	440305	446448	6143	4.00	1024	24,572	7.2
09/29/05	24.00	0.00	24.00	446448	452237	5789	4.00	965	23,156	6.8
09/30/05	24.00	0.00	24.00	452237	457851	5614	4.00	936	22,456	6.5
Totals	720.00	0.00	720.00					25538	612,920	178.77

Robbins Sawmill Daily Boiler Fuel Usage
Sep-05 EMMISSION UNIT NO. 002 HURST BOILER

Boiler 2	Hrs. Cor	Combustible Fuel in Boiler Auger Revolutions				Combustik	ole Fuel Used	Daily Avg. Hourly Heat Input Rate (13.1)		
Day	Schd.	Down Time	Run Time	Beginning	Ending	Total		Lbs/Hr	Lbs/day	MMBTU/hr
09/01/05	24.00	0.00	24.00	3775517	3786672 ·	11155	4.00	1859	44,620	13.0
09/02/05	24.00	0.00	24.00	3786672	3797844	11172	4.00	1862	44,688	13.0
09/03/05	24.00	0.00	24.00	3797844	3809037	11193	4.00	1866	44,772	13.1
09/04/05	24.00	0.00	24.00	3809037	3820036	10999	4.00	1833	43,996	0.0
09/05/05	24.00	0.00	24.00	3820036	3831146	11110	4.00	1852	44,440	13.0
09/06/05	24.00	0.00	24.00	3831146	3842303	11157	4.00	1860	44,628	13.0
09/07/05	24.00	0.00	24.00	3842303	3853042	10739	4.00	1790	42,956	12.5
09/08/05	24.00	0.00	24.00	3853042	3864552	11510	4.00	1918	46,040	13.4
09/09/05	24.00	0.00	24.00	3864552	3875543	10991	4.00	1832	43,964	12.8
09/10/05	24.00	0.00	24.00	3875543	3886712	11169	4.00	1862	44,676	13.0
09/11/05	24.00	0.00	24.00	3886712	3897902	11190	4.00	1865	44,760	13.1
09/12/05	24.00	0.00	24.00	3897902	3909042	11140	4.00	1857	44,560	13.0
09/13/05	24.00	0.00	24.00	3909042	3920187	11145	4.00	1858	44,580	13.0
09/14/05	24.00	0.00	24.00	3920187	3931350	11163	4.00	1861	44,652	13.0
09/15/05	24.00	0.00	24.00	3931350	3942509	11159	4.00	1860	44,636	13.0
09/16/05	24.00	0.00	24.00	3942509	3953709	11200	4.00	1867	44,800	13.1
09/17/05	24.00	0.00	24.00	3953709	3964972	11263	4.00	1877	45,052	13.1
09/18/05	24.00	0.00	24.00	3964972	3975895	10923	4.00	1821	43,692	12.7
09/19/05	24.00	0.00	24.00	3975895	3986892	10997	4.00	1833	43,988	12.8
09/20/05	24.00	0.00	24.00	3986892	3998091	11199	4.00	1867	44,796	13.1
09/21/05	24.00	0.00	24.00	3998091	4009230	11139	4.00	1857	44,556	13.0
09/22/05	24.00	0.00	24.00	4009230	4020410	11180	4.00	1863	44,720	13.0
09/23/05	24.00	0.00	24.00	4020410	4031404	10994	4.00	1832	43,976	12.8
09/24/05	24.00	0.00	24.00	4031404	4042563	11159	4.00	1860	44,636	13.0
09/25/05	24.00	0.00	24.00	4042563	4053553	10990	4.00	1832	43,960	12.8
09/26/05	24.00	0.00	24.00	4053553	4064708	11155	4.00	1859	44,620	13.0
09/27/05	24.00	0.00	24.00	4064708	4075707 ,	10999	4.00	1833	43,996	12.8
09/28/05	24.00	0.00	24.00	4075707	4086817	11110	4.00	1852	44,440	13.0
09/29/05	24.00	0.00	24.00	4086817	4097974	11157	4.00	1860	44,628	13.0
09/30/05	24.00	0.00	24.00	4097974	4109073	11099	4.00	1850	44,396	12.9
Totals	720.00	0.00	720.00		i,			55,593	1,334,224	376.32

KILN No. 1 CHARGES SEPTEMBER 2005						
	Charge		LUMBER			
Date	No.	Dimension	#	Board Feet	Poles (cf)	Poles (bf)
09/01/05						
09/02/05					•	
09/03/05						
09/04/05						
09/05/05	1132P				6,710.20	559,183
09/06/05						
09/07/05						
09/08/05						
09/09/05	1133P				5,213.70	434,475
09/10/05					<u> </u>	
09/11/05						
09/12/05						
09/13/05						
09/14/05	1134P				6,032.10	502,675
09/15/05						
09/16/05						
09/17/05	1135P	7			6,140.40	511,700
09/18/05						
09/19/05						
09/20/05						
09/21/05						
09/22/05						
09/23/05	1137P				5,769.40	480,783
09/24/05						
09/25/05						
09/26/05						
09/27/05	1138P				6,775.70	564,642
09/28/05						
09/30/05	1139P				6,276.90	523,075
09/30/05	1140P				6,317.30	526,442
			Sept Total	128,484	52,582.60	4,381,883
			YTD	4,422,976	378,619.48	31,551,623

559,183
434,475
502,675
511,700
480,783
564,642
523,075 526,442 <b>4,510,367</b> <b>35,974,599</b>

12 consecutive number us YTO

	Charma	KILN No. 2	CHARGES LUMBER	SEPTEMBER	2005		Total Production
Date	Charge No.	Dimension	#	Board Feet	Poles (cf)	Poles (bf)	(bf)
09/01/05	2178L	5/4 X 4 X 8	11,191	37,303	0.00	T Oles (bi)	37,303
03/01/03	21700	5/4 X 6 X 8	7,156	35,780	0.00		35,780
9/2/2005		0.4 7.0 7.0	7,100	00,700	0.00		00,700
09/03/05	2179L	2 X 6 X 8	4,201	33,608	0.00	_	33,608
00,00,00		5/4 X 4 X 8	1,430	4,766	0.00	-	4,766
		5/4 X 6 X 8	1,195	5,975	0.00	-	5,975
		2 X 4 X 8	8,415	44,880	0.00	-	44,880
09/04/05	2180L	2X6X8	751	6,008	0.00	•	6,008
		2 X 4 X 8	5,169	27,568	0.00		27,568
		5/4 X 4 X 8	4,059	13,530	0.00	-	13,530
		5/4 X 6 X 8	911	4,555	0.00		4,555
09/05/05							
09/06/05							
09/07/05	2181L	3 X 4 X 8	4,453	35,624	0.00	-	35,624
		6 X 6 X 8	1,709	41,016	0.00	-	41,016
09/08/05							
09/09/05	2182L	2 X 4 X 8	18,319	97,701	0.00	-	97,701
09/10/05	2183L	2 X 4 X 8	11,857	63,237	0.00	-	63,237
		2 X 6 X 8	4,309	34,472	0.00	•	34,472
09/11/05							
09/12/05	2184L	2 X 4 X 8	7,900	42,133	0.00	-	42,133
		2 X 6 X 8	3,054	24,432	0.00	-	24,432
		5/4 X 6 X 8	4,554	22,770	0.00	-	22,770
09/13/05	2185L	5/4 X 4 X 8	14,247	47,490	0.00	<u> </u>	47,490
00144/05		5/4 X 6 X 8	4,991	24,955	0.00	-	24,955
09/14/05	04001	0 7 0 7 0	4 0 4 0	40.770	0.00		40.77
09/15/05	2186L	6X6X8	1,949	46,776	0.00	-	46,776
09/16/05	04071	2 7 4 7 0	40.075	00.400	0.00	-	00.400
09/17/05	2187L 2188L	2X4X8	18,075 12,222	96,400 97,776	0.00	-	96,400
09/18/05 09/19/05	2189L	2 X 6 X 8 2 X 4 X 8	18,076	96,405	0.00	-	97,776 96,405
09/19/05		2X6X8	12,226	97,808			
09/20/05	2190L	2 X 6 X 8	12,226	97,808	0.00	-	97,808
09/21/05	2191L	2 X 4 X 8	18,142	96,757	0.00		96,757
09/23/05	2191L 2192L	5/4 X 4 X 8	22,454	74,847	0.00	-	74,847
09/24/05	2192L 2193L	2 X 6 X 8	11,994	95,952	0.00	-	95,952
09/25/05	2193L	2 X 4 X 8	18,236	97,259	0.00	-	97,259
09/26/05	2194L	2 7 4 7 0	10,230	91,209	0.00	-	97,233
09/27/05	2195L	2 X 4 X 8	18,365	97,947	0.00	-	97,947
09/28/05	2196L	5/4 X 6 X 8	14,061	70,305	0.00		70,305
03/20/03	21302	5/4 X 4 X 8	472	1,573	0.00		1,573
09/29/05	2197L	2 X 6 X 8	12,256	98,048	0.00		98,048
09/30/05	2198L	2 X 6 X 8	11,927	95,416	0.00	-	95,416
30,00,00		2 X 4 X 8	384	2,048	0.00	_	2,048
09/30/05	2199L	2 X 4 X 8	18,247	97,317	0.00	_	97,317
			Sept Total	1,910,439	0.00		1,910,439
			YTD	13,102,154	0.00		13,102,154
			<u> </u>	, ,	<u> </u>		,10=,10=

12 consecutive months US

Sep-05

**EMISSION UNIT NO. 005 SAWDUST STORAGE SILO** 

Deb-03					US OATTOO	
	Sawmill			Sawmill Daily	Est. Sawmill Hourly	Est. Hourly
	Sched.	Sawmill	Sawmill	Production,	Production,	Sawdust
	Run	Down Time	Run Time	Mbf/day	Mbf/hour	Production,
Date	Time	(actual)	(actual)	(actual)	(actual)	tons/hour
09/01/05	4.00	2.12	1.88	42.645	22.684	13.82
09/02/05	4.00	2.00	2.00	35.415	17.708	13.82
09/03/05	0.00		0.00		0.000	13.82
09/04/05	0.00		0.00		0.000	13.82
09/05/05	0.00		0.00		0.000	13.82
09/06/05	10.00	0.16	9.84	96.421	9.799	13.82
09/07/05	10.00	0.50	9.50	101.917	10.728	13.82
09/08/05	10.00	1.00	9.00	68.234	7.582	13.82
09/09/05	9.00	0.26	8.74	98.931	11.319	13.82
09/10/05	9.00	0.42	8.58	84.672	9.869	13.82
09/11/05	0.00		0.00		0.000	13.82
09/12/05	8.00	1.50	6.50	80.316	12.356	13.82
09/13/05	8.00	0.28	7.72	84.569	10.955	13.82
09/14/05	9.00	0.45	8.55	102.140	11.946	13.82
09/15/05	9.00	0.40	8.60	103.141	11.993	13.82
09/16/05	8.00	2.00	6.00	70.007	11.668	13.82
09/17/05	6.50	0.29	6.21	85.226	13.724	13.82
09/18/05	0.00		0.00		0.000	13.82
09/19/05	10.00	0.50	9.50	100.156	10.543	13.82
09/20/05	10.00	0.90	9.10	103.889	11.416	13.82
09/21/05	10.00	0.10	9.90	128.448	12.975	13.82
09/22/05	9.00	0.17	8.83	83.852	9.496	13.82
09/23/05	9.00	0.17	8.83	83.852	9.496	13.82
09/24/05	8.00	0.31	7.69	92.582	12.039	13.82
09/25/05	0.00		0.00		0.000	13.82
09/26/05	10.00	1.00	9.00	92.582	10.287	13.82
09/27/05	10.00	0.24	9.76	123.963	12.701	13.82
09/28/05	10.00	0.13	9.87	123.340	12.496	13.82
09/29/05	9.50	1.00	8.50	103.315	12.155	13.82
09/30/05	10.00	1.30	8.70	115.614	13.289	13.82
Totals	210.00	17.20	192.80	2205.227	289.223	
Max	10.00	2.12	9.90	128.45	22.68	
Avg	7.00	0.72	6.43	91.88	9.64	Š
Permit				130.00		

Est. Daily Sawdust Production, tons/day 25.98 27.64 0.00 0.00 0.00 135.99 131.29 124.38 120.79 118.58 0.00 89.83 106.69 118.16 118.85 82.92 85.82 0.00 131.29 125.76 136.82 122.03 122.03 106.28 0.00 124.38 134.88 136.40 117.47 120.23 2664.50 136.82 88.82 331.68

# **EMISSION UNIT NO. 006 PLANER SHAVINGS STORAGE BIN**

3eb-03			00.011 011	111 140. 000		TIAVIIVOO
	Planer Mill Sched.	Planer Mill	Planer Mill	Planer Mill Daily Production,	Est. Hourly Shavings	Est. Daily Shavings
	Run	Down Time	Run Time	Mbf/day	Production,	Production,
Date	Time	(actual)	(actual)	(actual)	tons/hour	tons per day
09/01/05	9.00	0.00	9.00	47.667	5.60	50.40
09/02/05	8.00	0.00	8.00	37.166	5.60 '	44.80
09/03/05	0.00		0.00		5.60	0.00
09/04/05	0.00		0.00		5.60	0.00
09/05/05	0.00		0.00		5.60	0.00
09/06/05	7.50	0.00	7.50	40.217	5.60	42.00
09/07/05	8.00	0.00	8.00	64.511	5.60	44.80
09/08/05	8.00	0.00	8.00	68.606	5.60	44.80
09/09/05	9.00	0.00	9.00	67.728	5.60	50.40
09/10/05	0.00		0.00		5.60	0.00
09/11/05	0.00		0.00		5.60	0.00
09/12/05	8.00	0.00	8.00	49.310	5.60	44.80
09/13/05	9.00	0.00	9.00	195.209	5.60	50.40
09/14/05	0.00		0.00		5.60	0.00
09/15/05	0.00		0.00		5.60	0.00
09/16/05	8.00	0.00	8.00	87.168	5.60	44.80
09/17/05	7.00	0.00	7.00	29.696	5.60	39.20
09/18/05	0.00		0.00		5.60	0.00
09/19/05	9.50	0.00	9.50	74.517	5.60	53.20
09/20/05	8.50	0.00	8.50	104.851	5.60	47.60
09/21/05	8.00	0.00	8.00	44.928	5.60	44.80
09/22/05	9.00	0.00	9.00	144.512	5.60	50.40
09/23/05	9.00	0.50	8.50	100.805	5.60	47.60
09/24/05	7.50	0.00	7.50	45.673	5.60	42.00
09/25/05	0.00		0.00		5.60	0.00
09/26/05	8.75	1.00	7.75	105.216	5.60	43.40
09/27/05	8.00	0.00	8.00	77.143	5.60	44.80
09/28/05	0.00	0.00	0.00	199.002	5.60	0.00
09/29/05	9.00	0.00	9.00	63.760	5.60	50.40
09/30/05	8.00	0.00	8.00	187.648	5.60	44.80
Totals	166.75	1:50	165.25	1835.333		925.40
Max	9.50	1.00	9.50	199.00		53.20
Avg	5.56	0.07	5.51	87.40		30.85
Permit			2	250.00		134.40



# Attachment 4

Professional Engineer Certification

# APPLICATION INFORMATION

	ofessional Engineer Certification
1.	Professional Engineer Name: Frank Darabi, P.E.
	Registration Number: 20385
2.	Professional Engineer Mailing Address
	Organization/Firm: Darabi & Associates, Inc.
	Street Address: 730 NE Waldo Road, Building A
	City: Gainesville State: Florida Zip Code: 32641
3.	Professional Engineer Telephone Numbers
	Telephone: (352) 376 - 6533 ext. Fax: (352) 377 - 3166
4.	Professional Engineer Email Address: fdarabi@jea.net
5.	Professional Engineer Statement:
	I, the undersigned, hereby certify, except as particularly noted herein*, that:
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions
	unit(s) and the air pollution control equipment described in this application for air permit, when
	properly operated and maintained, will comply with all applicable standards for control of air
	pollutant emissions found in the Florida Statutes and rules of the Department of Environmental
	Protection; and
1	(2) To the best of my knowledge, any emission estimates reported or relied on in this application
1	are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an
	emissions unit addressed in this application, based solely upon the materials, information and
	calculations submitted with this application.
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here $\square$ , if
	so), I further certify that each emissions unit described in this application for air permit, when
	properly operated and maintained, will comply with the applicable requirements identified in this
	application to which the unit is subject, except those emissions units for which a compliance plan
	and schedule is submitted with this application.
	(4) If the purpose of this application is to obtain an air construction permit (check here, if so)
	or concurrently process and obtain an air construction permit and a Title V air operation permit
-	revision or renewal for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this
	application have been designed or examined by me or individuals under my direct supervision and
ļ	found to be in conformity with sound engineering principles applicable to the control of emissions
	of the air pollutants characterized in this application.
	(5) If the purpose of this application is to obtain an initial air operation permit or operation
1	permit revision or renewal for one or more newly constructed or modified emissions units (check
	here [ ], if so), I further certify that, with the exception of any changes detailed as part of this
	application, each such emissions unit has been constructed or modified in substantial accordance
	with the information given in the corresponding application for air construction permit and with
'	all provisions of miletting tick permit
	11/29/05
	Signature Date
	No. 20385
İ	(seal) STATE OF

\* Attack and exception to certification statement.

DEP Form No. 62:240.900 Form

Effective: 06/16/09/NAL