



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

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

Re: Project No. 1190011-008-AC
Robbins Manufacturing Company
Minor Air Construction Permit
Project: Construction of Wood Preserving Operation

Dear Mr. Robbins:

On April 2, 2012, you submitted an application for an after-the-fact air permit to construct a Chromated Copper Arsenate (CCA) wood preserving operation. The facility is located in Sumter County at S.R. 50 and Route 471 in Tarrytown, Florida. After review of the application, the Department has prepared the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must publish in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Danny Stubbs, at 813-632-7600 Ext. 159.

Sincerely,

Robert C. Wong
District Air Program Administrator
Southwest District

Enclosures

RCW/ds/cm

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

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

Project No. 1190011-008-AC
Minor Air Construction Permit
Sumter County, Florida

Authorized Representative:
Jerome G. Robbins, II, Vice President

Project: Construction of Wood
Preserving Operation

Facility Location: Robbins Manufacturing Company operates the existing wood products facility, which is located in Sumter County at S.R. 50 and Route 471 in Tarrytown, Florida.

Project: The applicant proposes to construct (after-the-fact) a Chromated Copper Arsenate (CCA) wood preserving operation at the existing facility. This CCA wood preserving operation will be used to pressure treat wood using preservatives that contain chromium and arsenic compounds, which are classified as hazardous air pollutants. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Southwest District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813/632-7600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C.,

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the

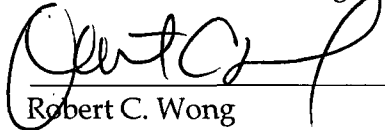
WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Hillsborough County, Florida.


Robert C. Wong
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

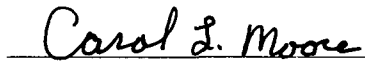
The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) 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 5/21/2012 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) 5/21/2012
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Air Resource Management, Southwest District Office
Draft Minor Air Construction Permit
Project No. 1190011-008-AC
Robbins Manufacturing Company
Sumter County, Florida

Applicant: The applicant for this project is Robbins Manufacturing Company. The applicant's authorized representative and mailing address is: Mr. Jerome G. Robbins, II, Vice President, Robbins Manufacturing Company, P.O. Box 17939, Tampa, FL 33682.

Facility Location: Robbins Manufacturing Company operates the existing wood products facility, which is located in Sumter County at S.R. 50 and Route 471 in Tarrytown, Florida.

Project: This project is for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation. This CCA wood preserving operation will be used to pressure treat wood using preservatives that contain chromium and arsenic compounds, which are classified as hazardous air pollutants. This wood preserving operation has potential emissions of 0.006 pounds/year of chromium compound and 0.006 pounds/year of arsenic compound.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Southwest District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813/632-7600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft

Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

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

Air Permit No. 1190011-008-AC
Permit Expires: 06/01/2013
Minor Air Construction Permit
Project Name: Construction of Wood
Preserving Operation

Authorized Representative:

Mr. Jerome G. Robbins, II, Vice President

This is the final air construction permit for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation. The proposed work will be conducted at the Robbins Manufacturing Company facility (Standard Industrial Classification No. 2421). The facility 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 this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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

This air pollution permit is 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 this permit. 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 this final permit, 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
DRAFT

Robert C. Wong	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 Permit 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 _____ 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.

DRAFT

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a sawmill facility that produces wood products such as utility poles and lumber. The facility includes two regulated wood fired boilers that supply heat to the facility's two kilns used for drying wood.

Facility ID No. 1190011	
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

Project Description and Proposed Emissions Unit

This project is for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation. This operation will utilize CCA as the primary preservative to pressure treat lumber. In addition to CCA, other preservatives such as borates, ammoniacal copper quaternary compounds, etc. may also be utilized in the future. The CCA operation is subject to 40 CFR 63, Subpart QQQQQQ - National Emissions Standards for Hazardous Air Pollutants for Wood Preserving Area Sources. This project will add the following emissions units.

Facility ID No. 1190011	
ID No.	Emission Unit Description
007	Wood Preserving Operation

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Exempt Emission Units/Activities

- A Bark Storage Bin located to the north of the Planer Shavings Storage Bin is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The bark is transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Bark Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.
- A Sawdust Storage Bin located to the north of the Bark Storage Bin is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The sawdust is transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Sawdust Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.

SECTION 1. GENERAL INFORMATION (DRAFT)

- A Wood Chip Storage Bin located to the east of the Planer Shavings, Bark, and Sawdust Storage Bins is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The wood chips are transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Wood Chip Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.
- A small kiln that uses a propane fired 0.25 MMBTU/hour heater is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 PM₁₀. The restriction on heat input rates to the boilers in this facility will ensure that the facility's PM₁₀ emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit modifies Permit No. 1190011-007-AO

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

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 Southwest 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.]

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC
CONDITIONS (DRAFT)**

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. Application for Non-Title V Air Operation Permit: This permit authorizes the after-the-fact construction of the permitted emissions unit (EU No. 007) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air 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.; and,
 - c. copies of the most recent month of records/logs specified in Specific Condition No. A.6.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 007 - Wood Preserving Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
007	<p><u>Wood Preserving Operation:</u></p> <p>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.</p> <p>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.</p> <p>The smaller pressure treatment cylinder is 40' long by 6.7' diameter, has a single door, and also operate at 150 psig pressure. The cylinder has one concentrate chemical tank, an effluent water tank, and one chemical mix tank. The cylinder and mix system will use either copper azole or alkaline copper quaternary (ACQ) as the chemical preservative.</p> <p>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.</p>

PERFORMANCE RESTRICTIONS

- A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 63, Subpart QQQQQQ - National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources, which is adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800(11), F.A.C.]
- A.2. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
- A.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, FAC and 40 CFR 63.11430(a)]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 007 - Wood Preserving Operation

- A.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, FAC and 40 CFR 63.11430(c)]

NOTIFICATION REQUIREMENTS

- A.5. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 007, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.

[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

- A.6. Recordkeeping: In addition to maintaining records to satisfy the requirements of the Management Practice Plan of Specific Condition No. A.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.

[Rule 62-4.070(3), F.A.C. and 40 CFR 63.11430(c)2]

PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-7600

PROJECT

Air Permit No. 1190011-008-AC
Minor Air Construction Permit

This project is for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation.

NOTICE AND PUBLICATION

The Permitting Authority distributed a draft minor air construction permit package on May 21, 2012. The applicant published the Public Notice in the Daily Commercial on May 25, 2012. The Permitting Authority received the proof of publication on June 12, 2012. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

On June 11, 2012, the Permitting Authority received comments via email from Mr. Cory Houchin on behalf of applicant. The following summarizes the comments and the Permitting Authority's response.

The applicant made a request that the Department add language to the permit that enables the small treatment vessel to use chromate copper arsenate (CCA), as well as other waterborne wood preserving treatments.

Response: The requested change only affects the emissions unit description in the permit and does not affect any of the emissions unit specific conditions. The draft permit description specifies copper azole or alkaline copper quaternary (ACQ) as the chemical preservative that will be used in the small cylinder; however, CCA was not specifically included. The permit, as written, will automatically capture the small cylinder and make it subject to 40 CFR 63, Subpart QQQQQQ, the associated recordkeeping requirements and work practices included the permit's "Management Practice Plan", if CCA is used in the vessel. As requested by the applicant, the final permit includes CCA as one of the chemical preservatives that may be used in the small treatment vessel in the emissions unit description section of the permit.

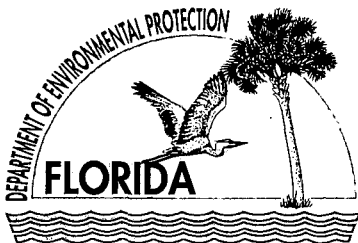
FINAL DETERMINATION

CONCLUSION

The changes that have been made are insignificant in nature and do not impose additional public noticing requirements. The permitting authority hereby issues the FINAL Permit with the changes noted above.

Robbins Manufacturing Company

Air Permit No. 1190011-008-AC
Construction of Wood Preserving Operation



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

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

Air Permit No. 1190011-008-AC
Permit Expires: 06/01/2013
Minor Air Construction Permit
Project Name: Construction of Wood
Preserving Operation

Authorized Representative:
Mr. Jerome G. Robbins, II, Vice President

This is the final air construction permit for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation. The proposed work will be conducted at the Robbins Manufacturing Company facility (Standard Industrial Classification No. 2421). The facility 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 this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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

This air pollution permit is 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 this permit. 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 this final permit, 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.

PRA DRAFT

Executed in Hillsborough County, Florida
DRAFT

Robert C. Wong
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit 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 _____ 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.

DRAFT

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a sawmill facility that produces wood products such as utility poles and lumber. The facility includes two regulated wood fired boilers and one exempt boiler that supply heat to the facility's two kilns used for drying wood.

Facility ID No. 1190011	
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

Project Description and Proposed Emissions Unit

This project is for the after-the-fact construction of a Chromated Copper Arsenate (CCA) wood preserving operation. This operation will utilize CCA as the primary preservative to pressure treat lumber. In addition to CCA, other preservatives such as borates, ammoniacal copper quaternary compounds, etc may also be utilized in the future. This operation is subject to 40 CFR 63, Subpart QQQQQQ - National Emissions Standards for Hazardous Air Pollutants for Wood Preserving Area Sources. This project will add the following emissions units.

Facility ID No. 1190011	
ID No.	Emission Unit Description
007	Wood Preserving Operation

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Exempt Emission Units/Activities

- A 150 HP Hurst, Series 400, boiler fired with only LP Gas was installed in October 2001, and is considered exempt per Rule 62-210.300(a)33., F.A.C. At a maximum LP Gas usage rate of 69 gallons/hour and based on 91,500 BTU/gallon of LP Gas, this boiler has a maximum heat input rate of 6.3 MMBTU/hr.
- A Bark Storage Bin located to the north of the Planer Shavings Storage Bin is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The bark is transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Bark Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.
- A Sawdust Storage Bin located to the north of the Bark Storage Bin is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The sawdust is transferred from the sawmill to the uncontrolled bin by conveyor belt.

SECTION 1. GENERAL INFORMATION (DRAFT)

- The uncontrolled Sawdust Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.
- A Wood Chip Storage Bin located to the east of the Planer Shavings, Bark, and Sawdust Storage Bins is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. The wood chips are transferred from the sawmill to the uncontrolled bin by conveyor belt.
- The uncontrolled Wood Chip Storage Bin's truck loading operation is located under the bin and is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.
- A small kiln that uses a propane fired 0.25 MMBTU/hour heater is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 PM₁₀.

PERMIT HISTORY/AFFECTED PERMITS

This permit modifies Permit No. 1190011-007-AO

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

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 Southwest 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.]

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC
CONDITIONS (DRAFT)**

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. Application for Non-Title V Air Operation Permit: This permit authorizes the after-the-fact construction of the permitted emissions unit (EU No. 007) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air 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.; and,
 - c. copies of the most recent month of records/logs specified in Specific Condition No. A.6.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 007 - Wood Preserving Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
007	<p><u>Wood Preserving Operation:</u></p> <p>This emissions unit is a wood preserving operation that utilized 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.</p> <p>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.</p> <p>The smaller pressure treatment cylinder is 40' long by 6.7' diameter, has a single door, and also operate at 150 psig pressure. The cylinder has one concentrate chemical tank, an effluent water tank, and one chemical mix tank. The cylinder and mix system will use either copper azole or alkaline copper quaternary (ACQ) as the chemical preservative.</p> <p>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 .</p>

PERFORMANCE RESTRICTIONS

- A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 63, Subpart QQQQQQ - National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources, which is adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800(11), F.A.C.]
- A.2. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
- A.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, FAC and 40 CFR 63.11430(a)]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 007 - Wood Preserving Operation

- A.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, FAC and 40 CFR 63.11430(c)]

NOTIFICATION REQUIREMENTS

- A.5. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 007, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.

[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

- A.6. Recordkeeping: In addition to maintaining records to satisfy the requirements of the Management Practice Plan of Specific Condition No. A.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.

[Rule 62-4.070(3), F.A.C. and 40 CFR 63.11430(c)2]