

April 2, 2012

Ms. Danielle Henry
Environmental Compliance Manager
Florida Department Environmental Protection
Division of Air Resource Management
13051 North Telecom Parkway
Temple Terrace, Florida 33637

RE: "After-the-Fact" Construction Permit Application
Waterborne Wood Preservation
Robbins Manufacturing Company, Sawmill – Sumter County
Facility ID No. 1190011

SOLUTION SOL

Dear Ms. Henry:

Pursuant to the response provided to the Department by this office March 13, 2012 regarding Field Warning Notice of 03/02/2012 delivered to Mr. William Ward of Robbins Manufacturing Company (Robbins) in Sumter County, find attached the referenced application and associated fee. You may recall that the warning notice alleged that Robbins did not secure an air construction permit for construction of a pressure treatment facility. The response indicated that this office would compile and submit an "after-the-fact" application for an air construction permit as soon as practicable.

You may also recall a telephone conversation with this office and Mr. Danny Stubbs and Mr. Amaury Betancourt of the Department regarding a small kiln that is not identified in the current air permit. The small kiln was observed by Mr. Betancourt during his inspection of 3/2/2012 but was not noted in the warning notice. The aforementioned response also noted that Robbins will address the undocumented kiln so that it might be accounted in Robbins' Sumter County air permit. Toward that end, find attached an estimate of the annual emissions generated by the pool heater that supplies heat to the kiln.

The small heater and kiln consume 0.25 mmbtu/hr and a little less than 150 gallons of propane per month. The kiln, which can hold up to 10,000 board feet, typically does not exceed 500,000 board feet annually. The volatile organic emissions (VOC) from the kiln are estimated to be less than 100 lb/yr. Based on its size and minimal emissions, the source is considered insignificant.

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Thank you for your consideration in this matter. Should you have questions or require further information, please feel free to contact this office or Mr. Jay Robbins at Robbins (813-971-3030) at any time.

Sincerely,

Cory A. Houchin Project Manager

Attachments with Check No. 462138

cc: Jay Robbins, Robbins Lumber Co.

## Robbins Manufacturing Company - Sumter County **Small Heater Propane Combustion Emissions**

Propane Use

1800 gal/yr

**Commercial Heater** 

0.25 mmbtu/hr

Pollutant	AP-42 Factor (lb/1000 gal)		
			i.e.
PM, total	0.7	E =	1.26 lb PM/yr
SO2	0.007	E =	0.0126 lb SO2/yr
NOX	13	E =	23.4 lb NOX/yr
CO2	12500	E =	22500 lb CO2/yr
CO -	7.5	E =	13.5 lb CO/yr
TOC	1	E =	1.8 lb TOC/yr
CH4	0.2	E =	0.36 lb CH4/vr