

Stubbs, Danny

From: Cory Houchin [houchinc@gmail.com]
Sent: Thursday, April 26, 2012 3:21 PM
To: Stubbs, Danny
Subject: Fwd: FW: Robbins Manufacturing Company - Project No. 1190011-008-AC

----- Forwarded message -----

From: William Ward <wward@robbinslumber.com>
Date: Tue, Apr 24, 2012 at 9:51 AM
Subject: FW: Robbins Manufacturing Company - Project No. 1190011-008-AC
To: Cory Houchin <houchinc@gmail.com>

Cory

Wanted to make sure you got this?

William

From: William Ward
Sent: Monday, April 23, 2012 2:23 PM
To: 'Cory Houchin'
Cc: Jay Robbins
Subject: Robbins Manufacturing Company - Project No. 1190011-008-AC

Cory

Robbins response is in green below:

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

From: "Stubbs, Danny" [Danny.Stubbs@dep.state.fl.us] **Date:** 04/13/2012 2:20PM
To: "houchinc@environmentalsciencesgroup.com" <houchinc@environmentalsciencesgroup.com>
Subject: Robbins Manufacturing Company - Project No. 1190011-008-AC

Mr. Houchin:

I have a few questions / information request regarding the Robbins Manufacturing Company Application submitted on April 2, 2012.

1. According to 40 CFR 63, Subpart QQQQQQ, section 63.11430 (c), a "management practice plan" for the pressure treatment system must be prepared. Please prepare a "management practice plan" and I will include it as an attachment to the permit. I will also use it to derive so basic recordkeeping requirements. **Arch Chemical Company is preparing Robbins contingency plan, hazard communication plan, confined space plan, emergency response plan, spill containment plan, lock out tag out plan, inspection forms, waste / drippage forms etc. as part of their scope of work in the turn key engineering design – build project.**

2. Could you provide a brief description (approximate size, function, content, operating temperature and pressure) of the major pieces of equipment (i.e. storage, cylinder, etc.) in the wood preserving operation? Some of this information is in the emissions unit section of the application and shown on the proposed drawing, but I need a little more information to write a good permit description. **The large CCA cylinder has double doors, is 96' long x 7' diameter, and will operate at 150 lbs of pressure. The cylinder has one concentrate chemical tank, an effluent water tank, and 4 chemical mix tanks. The CCA cylinder will be used to treat industrial products (class poles, marine piling, foundation piling, barn poles, corner/fence post, and plywood). Some industry related lumber will be treated in the CCA cylinder; rough marine lumber, structural lumber, + structural timbers.**

3. Question, the proposed drawing includes two cylinder, one is labeled "future cylinder". Is future cylinder a part of this permit? **Although the completion of the second cylinder will be 3 to 4 months behind the larger CCA system, it should be included in the permit.....The small cylinder has a single door, is 6.7' diameter by 40' long, and will operate also @ 150 lbs. of pressure. The cylinder has been installed as had the concentrate chemical tank, one effluent tank, and one mix tank. The cylinder and mix system will use either copper azole or ACQ.**

Thanks for your help.

If you have any questions regarding the above requests, please feel free to call or email.

Danny Stubbs

Engineering Specialist III

Air Resource Management

FDEP Southwest District

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