

Stubbs, Danny

From: William Ward [wward@robbinlumber.com]
Sent: Monday, May 07, 2012 4:48 PM
To: Stubbs, Danny
Cc: houchinc@environmentalsciencesgroup.com; Jay Robbins; Matthew Robinson
Subject: Management Practice Plan
Attachments: tt MANAGEMENT PRACTICES PLAN.doc

Mr. Stubbs,
Attached is the Tarrytown M.P.P. document. Thanks for your patience.
Please don't hesitate to ask if you have any questions or need additional information.
Regards;
William Ward

From: Stubbs, Danny [mailto:Danny.Stubbs@dep.state.fl.us]
Sent: Monday, May 07, 2012 3:07 PM
To: William Ward
Cc: houchinc@environmentalsciencesgroup.com
Subject: Management Practice Plan

Mr. Ward,

I have attached a copy of the Management Practice Plan from the Robbins Tampa Facility. This is the type of plan that I need for the construction permit. Please let me know when you will be able to provide this document.

Thanks for your help.

Danny Stubbs
Engineering Specialist III
Air Resource Management
FDEP Southwest District
Ph. 813-632-7600 Ext. 159
fax 813-632-7668

Please Note: This staff assessment is preliminary, and is designed to assist in the review of the information provided prior to final agency action. The comments provided herein are not the final position of the department and may be subject to revision pursuant to additional information and further review. Florida has a very broad public records law. Most written communications to or from officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

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MANAGEMENT PRACTICE PLAN
40 CFR 63 SUBPART QQQQQQ
NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS
AIR POLLUTANTS (NESHAP) FOR AREA SOURCES
WOOD TREATMENT FACILITIES

ROBBINS MANUFACTURING CO, INC.
13904 STATE ROAD # 471
TARRYTOWN, FLORIDA 33597

The following operating procedures are utilized at this facility to reduce Hazardous Air Pollutants (HAPs) and to document compliance with the requirements of 40 CFR 63 Subpart QQQQQQ.

- 1: Procedures used to minimize preservative usage:
 - a: We use a pressurized cylinder whereby excess preservative is returned to the solution storage tanks after each treatment cycle.
 - b: We treat in accordance to the American Wood Protection Association (AWPA) standards to ensure that the correct amount of preservatives is used to gain the desired retention.

- 2: Records on the type of treatment process and types and amounts of wood preservatives used:
 - a: We have a total of one pressurized cylinder where we use a waterborne Chromate Copper Arsenic (CCA) preservative. In the near future, we will have a second cylinder where we use either Copper Azole (CA) or ACQ (alkaline copper quaternary) to pressure treat wood.

 - b: The amounts of wood preservative we use can be found in various locations such as our individual charge reports, inventory records, and accounts payable files.

- 3: Charge records identifying pressures:
 - a: In accordance with AWPA standards, charge records that identify pressure readings inside the retorts are maintained.

4. Thermal treatment process: a: Not applicable to this facility.

- 5: Store treated wood on a drip pad:
 - a: In accordance with the Resource Conservation and Recovery Act (RCRA), 40 CFR Subpart W, all or our wood is allowed to drip on a drip pad that allows drippage to drain to a sump that is directed to our storage tanks for reuse in the process.

 - b: In accordance with RCRA, 40 CFR subpart W, we maintain cease drippage records whereby each charge is documented to be drip free prior to removal from the drip pad.

- 6: To the extent practicable, fully drain the retort prior to opening the retort door:
 - a: It is our procedure to remove as much treating solution from the cylinder back to our storage tank through vacuum process and gravity drainage prior to opening the door.
 - b: Any remaining solutions is captured by the door sump and directed back to our solution storage tanks for reuse in the process.

- 7: Promptly collect any spills:
 - a: It is our procedure to promptly stop and recover any leaks or spills whether they occur from process tanks and equipment or from storage, handling, and transfer operations.

- 8: Corrective Actions:
 - a: It is our standard operating procedure to perform relevant corrective actions such as equipment repair and calibration prior to start up after a malfunction.

Stubbs, Danny

From: Stubbs, Danny
Sent: Monday, May 07, 2012 3:07 PM
To: 'ward@robbinlumber.com'
Cc: houchinc@environmentalsciencesgroup.com
Subject: Management Practice Plan
Attachments: 0570044-MPP.pdf

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I have attached a copy of the Management Practice Plan from the Robbins Tampa Facility. This is the type of plan that I need for the construction permit. Please let me know when you will be able to provide this document.

Thanks for your help.

Danny Stubbs
Engineering Specialist III
Air Resource Management
FDEP Southwest District
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MANAGEMENT PRACTICE PLAN
40 CFR 63 SUBPART QQQQQQ
NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS
AIR POLLUTANTS (NESHA~~P~~) FOR AREA SOURCES
WOOD TREATMENT FACILITIES

Robbins Manufacturing
13001 N. Nebraska Ave.
Tampa, Florida 33612

The following operating procedures are utilized at this facility to reduce Hazardous Air Pollutants (HAPs) and to document compliance with the requirements of 40 CFR 63 Subpart QQQQQQ.

1. Procedures used to minimize preservative usage:
 - a. We use a pressurized cylinder whereby excess preservative is returned to the storage tanks after each treatment cycle.
 - b. We treat in accordance the American Wood Protection Association (AWPA) standards to ensure that the correct amount of preservative is used to gain the desired retention.
2. Records on the type of treatment process and types and amounts of wood preservatives used:
 - a. We have a total of one pressurized cylinders where we use a waterborne Chromated Copper Arsenic (CCA) preservative. We have 2 cylinders where we use L3 (all organic material). We have one cylinders where we use Copper Azole (CA) to pressure treat wood.
 - b. The amounts of wood preservative we use can be found in various locations such as our individual charge reports, inventory records, and accounts payable files.
3. Charge records identifying pressures:
 - a. In accordance with AWPA standards, charge records that identify pressure readings inside the retorts are maintained
4. Thermal treatment process:
 - a. Not applicable to this facility
5. Store treated wood on a drip pad:
 - a. In accordance with the Resource Conservation and Recovery Act (RCRA), 40 CFR Subpart W, all of our wood is allowed to drip on a drip pad that allows drippage to drain to a sump that is directed to our storage tanks for reuse in the process
 - b. In accordance with RCRA, 40 CFR subpart W, we maintain cease drippage records whereby each charge is documented to be drip free prior to removal from the drip pad.

6. To the extent practicable, fully drain the retort prior to opening the retort door:
 - a. It is our procedure to remove as much treating solution from the cylinder through vacuum and gravity drainage prior to opening the door.
 - b. Any remaining solution is captured by the door sump and directed back to our storage tanks for reuse in the process
7. Promptly collect any spills:
 - a. It is our procedure to promptly stop and recover any leaks or spills whether they occur from process tanks and equipments or from storage, handling and transfer operations.
 - b. In accordance with RCRA, 40 CFR Subpart J, we inspect our tanks, pumps and piping daily. Any leaks or spills are immediately addressed.
8. Corrective actions:
 - a. It is our standard operating procedure to perform relevant corrective actions such as equipment repair and calibration prior to start up after a malfunction.