

SWD INTERNAL PERMITTING MEMORANDUM

TO: Robert C. Wong *RCW*
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E. *CZ*
Air Permitting Manager

FROM: Danny Stubbs *DS*
Air Permitting Engineering Specialist

DATE: 05/14/2012

SUBJECT: Draft Permit No: 1190011-008-AC
Facility Name: Robbins Manufacturing Company

Day 90: 07/01/2012

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 and which are classified as hazardous air pollutants. Potential emissions from this operation are very low (0.006 pounds/year for chromium compounds and 0.006 pounds/year for arsenic compound); however, this operation is defined as an area source and is subject to 40 CFR 63, Subpart QQQQQQ.

The construction of the wood preserving operation was discovered on March 1, 2012 during an inspection performed by Mr. Amaury Betancourt. A warning letter was mailed to the permittee on March 22, 2012 by the Department regarding this matter and a warning letter meeting was held on April 4, 2012. On April 2, 2012, prior to the warning letter meeting, Robbins Manufacturing Company submitted an after-the-fact construction application for the wood preserving operation. At the time this draft permit package was submitted, the enforcement case was still open.

A formal RAI was not necessary for this project; however, an email was sent to the P.E., Mr. Cory Houchin, on April 13, 2012 requesting additional process description information and the submittal of a "Management Practice Plan" required by 40 CFR Subpart 63, Subpart QQQQQQ. A response that included the requested process description information was received from Mr. Houchin on April 26, 2012 and the "Management Practice Plan" was received in an email from Mr. William Ward on May 7, 2012.

A pre-draft permit was emailed to Mr. Jerome Robbins, II, Mr. Ward and Mr. Houchin on May 10, 2012. They responded on May 11, 2012 with one requested change to the permit. They stated that the 150 HP boiler included in the "Exempt Emissions Units/Activities" of the pre-draft permit is no longer on site. As a result, the boiler was removed from the draft permit.

I recommend issuance of the draft permit.