

Panetta, Joe

0810219

From: Paul Sleasman [Paul.Sleasman@tropitone.com]
Sent: Thursday, June 24, 2010 2:00 PM
To: Panetta, Joe
Cc: Rebecca Cotogno
Subject: Tropitone Submittal
Attachments: Tropitone Initial Record Submittal - Monthly Emission.pdf

Joe, attached is the information you requested from Tropitone Furniture. Please let me know if you need anything else. I can be reached on my cell phone (941) 661-2969.

Paul Sleasman
Tropitone Furniture
Supervisor:
Maintenance
Safety & Environmental
Sunwest Operations

(941)328-6156

Tropitone Furniture Co., Inc.
 1401 Commerce Boulevard Sarasota, FL 34243
 Permit No. 0810219-002-AC 0810219-003-AO

Monthly Material Usage

Material	Tropitone Item #	Application Technique	Density (lbs/gal)	Styrene (Wt%)	MMA (Wt%)	Styrene EF ² (lbs/ton)	MMA EF ² (lbs/ton)	Monthly Usage (lbs)																
								Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	
Gelcoats																								
Black	R30GGBLK	Atomized Spray	8.3	26.69%	4.50%	238	75	0	50	50	170	100	0	60	60	60	200	120	86	43	723	283	279	
Boulder	R30GGBLD	Atomized Spray	8.3	27.88%	4.69%	248	75	2,046	400	1,058	500	560	1,000	675	1,005	596	1,000	463	390	397	781	250	625	
Chocolate	R30GCHO	Atomized Spray	8.3	27.79%	4.66%	247	75	96	0	150	220	100	0	60	100	105	384	49	47	54	0	0	439	
Clear	R30GCCTC	Atomized Spray	9	43.48%	0.00%	522	0	1,350	1,150	1,275	1,012	1,600	940	1,196	1,250	1,700	1,275	1,292	536	972	1,150	1,050	1,125	
Coffee	R30GCCOF	Atomized Spray	9	27.65%	4.65%	246	75	0	50	60	50	150	100	50	0	0	0	0	0	0	0	0	11	88
Fawnskin	R30GCFAW	Atomized Spray	9	27.84%	4.69%	248	75	108	60	55	50	70	260	50	50	180	160	27	102	0	125	0	50	50
Linex	R30GCLIN	Atomized Spray	8.3	27.51%	4.63%	245	75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	125	375	
Mesa	R30GCMES	Atomized Spray	8.3	27.80%	4.68%	247	75	219	100	95	60	50	320	250	50	110	294	89	276	215	110	276	94	94
Morocco	R30GCWOR	Atomized Spray	8.3	27.80%	4.68%	247	75	515	175	175	502	100	150	80	100	0	0	0	0	0	27	0	275	0
Slate	R30GCSLT	Atomized Spray	8.3	27.45%	4.62%	244	75	96	450	450	700	160	75	50	50	25	0	79	24	67	190	0	89	
Wheat	R30GCWHE	Atomized Spray	9	30.00%	5.00%	267	75	453	559	659	502	475	475	250	475	518	480	520	275	336	445	483	326	
White	R30GCWHI	Atomized Spray	8.3	27.49%	5.00%	245	75	0	50	50	60	50	75	40	50	240	0	32	48	180	415	255	44	
Resin																								
Resin	R30RE600	Mechanical Atomized Spray	8.9	32.99%	0.00%	111	0	420	390	445	410	450	430	400	410	0	285	150	25	275	335	150	110	
Catalyst																								
MEKP			n/a	n/a	n/a	n/a	n/a	88	80	92	75	70	80	60	60	56	64	60	24	12	64	64	56	
								Total Monthly Gelcoat Usage (lbs) =	4,883	3,044	4,077	3,826	3,395	3,395	2,761	3,180	3,534	2,871	1,784	2,281	3,939	3,008	3,533	
								Total Monthly Resin Usage (lbs) =	420	390	445	410	450	430	400	410	0	285	150	25	275	335	150	110
								Total Monthly Catalyst Usage (lbs) =	88	80	92	75	70	80	60	60	56	64	60	24	12	64	64	56

*The monthly log shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.
 ** If any month results in styrene emissions being within 10% of the allowable emissin limit for the prior consecutive 12-month period, the monthly log required shall be kept daily.

Notes:

1. Styrene & MMA Content from Regulatory Data Sheets or MSDS.
2. EF corresponds to the Unified Emission Factors for Open Molding of Composites, American Composites Manufacturers Association.
3. MEKP is methyl ethyl ketone peroxide.

Attached To June 24,
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Tropitone Furniture Co., Inc.
 1401 Commerce Boulevard Sarasota, FL 34243
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Monthly Styrene Emission

Material	Tropitone Item#	Application Technique	Styrene EF (lbs/ton)	Monthly Styrene Emission (lbs)															
				Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10
Gelcoats																			
Black	R30GCBK	Atomized Spray	238	0	6	6	20	12	0	7	7	7	24	14	10	5	86	34	33
Boulder	R30GGBLD	Atomized Spray	248	254	131	62	68	124	84	125	74	124	124	57	48	49	97	31	78
Chocolate	R30GCCHO	Atomized Spray	247	12	0	19	27	12	0	7	12	13	47	6	6	7	0	0	54
Clear	R30GCCTC	Atomized Spray	522	352	333	284	418	245	312	326	444	333	337	140	254	300	274	294	294
Coffee	R30GCCOF	Atomized Spray	246	0	6	7	6	18	6	6	0	0	0	0	0	0	0	1	11
Fawnskin	R30GCFAW	Atomized Spray	248	13	7	6	9	32	6	6	22	20	3	13	0	16	0	0	6
Linen	R30GCLIN	Atomized Spray	245	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	48
Mesa	R30GCMES	Atomized Spray	247	27	12	12	7	6	40	31	6	14	36	11	34	27	14	34	12
Morocco	R30GCMOR	Atomized Spray	247	64	22	22	62	12	19	10	12	0	0	0	0	3	0	34	0
Slate	R30GCSLT	Atomized Spray	244	12	55	55	85	18	9	6	6	3	0	10	3	8	23	0	11
Wheat	R30GCWHE	Atomized Spray	267	60	75	88	67	63	63	33	63	64	64	68	37	45	59	64	44
White	R30GCWHI	Atomized Spray	245	0	6	6	7	6	9	5	6	29	0	4	6	22	51	31	5
Resin																			
Resin	R30RE600	Mechanical Atomized Spray	111	23	22	25	23	25	24	22	23	0	16	8	1	15	19	8	6
Catalyst																			
MEKP			n/a																
Monthly Styrene Emission (lbs) =				817	561	710	638	669	578	530	593	664	664	521	298	435	664	527	599
Monthly Styrene Emission (tons) =				0.41	0.28	0.35	0.32	0.33	0.29	0.27	0.30	0.33	0.33	0.26	0.15	0.22	0.33	0.26	0.30
12-Month Rolling Styrene Emission (tons) =																			
Is daily record keeping required?																			

*The monthly log shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.
 ** If any month results in styrene emissions being within 10% of the allowable emission limit for the prior consecutive 12-month period, the monthly log required shall be kept daily.

- Notes:**
1. Styrene & MMA Content from Regulatory Data Sheets or MSDS.
 2. EF corresponds to the Unified Emission Factors for Open Molding of Composites, American Composites Manufacturer's Association.
 3. Catalyst does not contain styrene.

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Monthly VOC Emission

Material	Tropitone Item #	Application Technique	VOC EF (lbs/ton)	Monthly VOC Emission (lbs)																	
				Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10		
Black	R30GGBLK	Atomized Spray	313	0	8	8	27	16	0	9	9	9	9	31	19	13	7	113	44	44	44
Boulder	R30GGBLD	Atomized Spray	323	330	65	171	81	89	162	109	162	96	162	162	75	63	64	126	40	40	101
Chocolate	R30GCCHO	Atomized Spray	322	15	0	24	35	16	0	10	16	17	62	8	8	8	9	0	0	0	71
Clear	R30GCCTC	Atomized Spray	522	352	300	333	264	418	245	312	326	444	333	337	140	140	254	300	274	274	294
Coffee	R30GCCOF	Atomized Spray	321	0	8	10	8	24	16	8	0	0	0	0	0	0	0	0	0	2	14
Fawnskin	R30GCFAW	Atomized Spray	323	17	10	9	8	11	42	8	8	29	26	4	16	0	0	20	0	0	8
Linen	R30GCLIN	Atomized Spray	320	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60
Mesa	R30GCMES	Atomized Spray	322	35	16	15	10	8	52	40	8	18	47	14	44	44	35	18	44	44	15
Morocco	R30GCMOR	Atomized Spray	322	83	28	28	81	16	24	13	16	0	0	0	0	0	4	0	44	0	0
Slate	R30GGSLT	Atomized Spray	319	15	72	72	112	24	12	8	8	4	0	13	4	4	11	30	0	0	14
Wheat	R30GCWHE	Atomized Spray	342	77	96	113	86	81	81	43	81	89	82	89	47	47	57	76	83	83	56
White	R30GCWHI	Atomized Spray	320	0	8	8	10	8	12	6	8	38	0	5	8	8	29	66	41	41	7
Resin	R30RE600	Mechanical Atomized Spray	111	23	22	25	23	25	24	22	23	0	16	8	1	15	19	8	8	8	6
Catalyst ¹	MEKP		n/a	1	1	1	1	1	1	1	1	1	1	1	1	0	0	1	1	1	1
Monthly VOC Emission (lbs) =				951	632	816	744	737	670	589	667	745	759	573	345	485	769	602	602	602	680
Monthly VOC Emission (tons) =				0.48	0.32	0.41	0.37	0.37	0.34	0.29	0.33	0.37	0.38	0.29	0.17	0.24	0.38	0.30	0.30	0.30	0.34
12-Month Rolling VOC Emission (tons) =															4.11	3.88	3.95	3.84	3.84	3.82	no
Does VOC emission exceed permit limit of 10.80 tons?															no	no	no	no	no	no	no

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*The monthly log shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.
 ** If any month results in styrene emissions being within 10% of the allowable emission limit for the prior consecutive 12-month period, the monthly log required shall be kept daily.

- Notes:
1. Styrene & MMA Content from Regulatory Data Sheets or MSDS.
 2. EF corresponds to the Unified Emission Factors for Open Molding of Composites, American Composites Manufacturer's Association.
 3. Catalyst does not contain styrene.
 The catalyst used contains the following VOC, which contribute de minimis levels of VOC emissions:
 0.04% of dimethyl phthalate (a HAP and a VOC).
 1% methyl ethyl ketone (a VOC).
 All VOC in catalyst are assumed 100% emitted.
 4. VOC EF is the summation of styrene EF and MMA EF.

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Monthly HAP Emission

EU 001 - Gelcoat and Resin Application		Monthly HAP Emission (lbs)																	
Material	Tropitone Item #	Application Technique	HAP-EF (lbs/ton)	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10
Gelcoats																			
Black	R30GCBLK	Atomized Spray	313	0	8	8	27	16	0	9	9	9	31	19	13	7	113	44	44
Boulder	R30GCBLD	Atomized Spray	323	330	65	171	81	89	162	109	162	96	162	75	63	64	126	40	101
Chocolate	R30GCCHO	Atomized Spray	322	15	0	24	35	16	0	10	16	17	62	8	8	9	0	0	71
Clear	R30GCCTC	Atomized Spray	522	352	300	333	264	418	245	312	326	444	333	337	140	254	300	274	294
Coffee	R30GCCOF	Atomized Spray	321	0	8	10	8	24	16	8	0	0	0	0	0	0	0	2	14
Fawnskin	R30GCFAW	Atomized Spray	323	17	10	9	8	11	42	8	8	29	26	4	16	0	20	0	8
Linen	R30GCLIN	Atomized Spray	320	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	60
Mesa	R30GCMES	Atomized Spray	322	35	16	15	10	8	52	40	8	18	47	14	44	35	18	44	15
Morocco	R30GCMOR	Atomized Spray	322	83	28	28	81	16	24	13	16	0	0	0	0	4	0	44	0
Slate	R30GCSLT	Atomized Spray	319	15	72	72	112	24	12	8	8	4	0	13	4	11	30	0	14
Wheat	R30GCWHE	Atomized Spray	342	77	96	113	86	81	81	43	81	89	82	89	47	57	76	83	56
White	R30GCWHI	Atomized Spray	320	0	8	8	10	8	12	6	8	38	0	5	8	29	66	41	7
Resin																			
Resin	R30RE600	Mechanical Atomized Spray	111	23	22	25	23	25	24	22	23	0	16	8	1	15	19	8	6
Catalyst																			
MEKP			n/a	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Monthly HAP Emission (lbs) =				950	632	815	743	736	670	589	666	744	758	572	345	484	769	601	689
Monthly HAP Emission (tons) =				0.47	0.32	0.41	0.37	0.37	0.33	0.29	0.33	0.37	0.38	0.29	0.17	0.24	0.38	0.30	0.34
12-Month Rolling HAP Emission (tons) =																			

Does HAP emission exceed permit limit of 10.80 tons?

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- Notes:**
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 2. EF corresponds to the Unified Emission Factors for Open Molding of Composites, American Composites Manufacturer's Association.
 3. Catalyst does not contain styrene.
 4. The catalyst used contains the following HAP, which contribute de minimis levels of HAP emissions: 0.04% of dimethyl phthalate (a HAP and a VOC). All HAP in catalyst are assumed 100% emitted.
 4. HAP EF is the summation of styrene EF and MMA EF.

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