

**REFERRAL FOR ENFORCEMENT REVIEW**

To: Danielle Henry, Enforcement Coordinator

Thru: Cindy Zhang-Torres, Permitting Supervisor (W/O Attachments)

From: Joseph V. Panetta, Environmental Specialist III

Date: April 9, 2007

Facilities: All About Marble

AIRS ID: 1050293-002-AG

The Permitting Section refers the following for enforcement review:

On March 15, 2007, An inspection was conducted in the above named facility.

Deficiency found:

1. Operating Cast Polymer Operation after registration expired.

Inspection performed March 15, 2007. New registration Application received March 22, 2007. This registration denied due to "Registration Type" not checked and not signed. Registration form received again on April 2, 2007. Operating without permit 163 days

1050293-002-AG -----registration expired 11/15/2006

**Rule 62-210.310(3), F.A.C.**

**(3) General Conditions.** All terms, conditions, requirements, limitations, and restrictions set forth in this subsection are "general permit conditions (a) The owner or operator's use of an air general permit is limited to five (5) years. Prior to the end of the five (5) year term, the owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. To avoid lapse of authority to operate, the owner or operator must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air general permit. The air general permit re-registration form shall contain all current information regarding the facility.

Attached:

  X   Inspection Report

  X   Registration denial memo

  X   Registration Application w/ letter of explanation by Mr. Valvo

March 26, 2007

To: Sandra Wilson, Administration  
Thru: Cindy Zhang-Torres, Air Permitting Supervisor  
From: Joseph V. Panetta, ESIII  
Subject: All About Marble  
Facility ID: 1050293

Please mail this General Permit Application to:

Mr. Louis Valvo  
4538 Maine Ave..  
Lakeland, FL 33840

Mr. Valvo:

The Department is returning your Air General Permit Registration Form, cover letter and check for \$100.00. The application you submitted is incomplete. On the first page of the registration form, the "Registration Type" is not indicated. Also the on second page the owner/authorized representative did not sign and date where indicated. Please resubmit a completed registration form and \$100.00 fee. Keep a copy of the completed registration form and the rules on premise.

Please feel free to email or call me if you have any further questions.

Joseph V. Panetta  
Air Program General Permits  
Florida Department of Environmental Protection  
Southwest District  
13051 North Telecom Pkwy.  
Temple Terrace, Fl 33637-09226  
[Joe.Panetta@dep.state.fl.us](mailto:Joe.Panetta@dep.state.fl.us)  
Tel: (813) 632-7600 ext 105  
Fax: (813) 632-7668

Dept. of Environmental  
Protection

All About Marble, Inc.  
P.O. Box 2434  
Eaton Park, FL 33840  
(863)665-5700

APR 02 2007

Southwest District

Dept. of Environmental  
Protection

MAR 22 2007

Southwest District

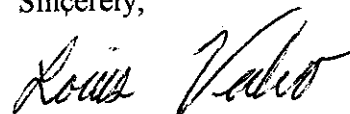
Department of Environmental Protection  
Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

March 15, 2007

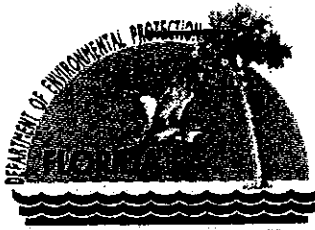
To Whom It May Concern:  
Re: 1050293

We were just made aware of the fact that our Environmental Permit expired on November 16, 2006. We were under the impression that we would be notified when the expiration date came near. As we have been in the past. I am enclosing a copy of the notification from the previous Environmental Specialist, stating this from 2001. It is very difficult to remember a permit that gets renewed once every five years. I do understand that some of the blame does fall upon our company, but any other items that require renewals from the state send you notices, i.e. Sales Tax Exemption Forms, Drivers License Renewals, Tag Renewals, and so on. I have no problem paying the \$100 registration fee, but I do ask if there are any fines they be waived because of this situation. We are a small company consisting of three employees who are also the officers. As shown in our records we do not produce a lot of cultured marble, making our cast polymer usage minute. If you could take this under consideration I would be extremely grateful. In the future we will be more aware of the fact a renewal letter will not be sent. If you have any questions feel free to contact me at 863-665-5700.

Sincerely,



Louis Valvo  
President



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

September 19, 2001

Mr. Louis A. Valvo  
All About Marble  
3615 Century Blvd. Unit 5  
Lakeland, Florida 33811

Dear Mr. Valvo:

Re: All About Marble  
1050293-001-AG

The above referenced air general permit will expire on November 6, 2001. To continue operating under an air general permit, please complete and submit the enclosed Cast Polymer Operation Air General Permit Notification Form and the \$100 processing fee. The form and fee must be submitted at least 30 days prior to the expiration date of the current permit.

Please call me at (813) 744-6100, extension 126, should you have any questions about this air general permit.

Sincerely,

Louis Fernandez  
Environmental Specialist III

Enclosure

**CAST POLYMER OPERATIONS  
AIR GENERAL PERMIT REGISTRATION FORM**

**Part II. Notification to Permitting Office**

(Detach and submit to appropriate permitting office; keep copy onsite)

**Instructions:** To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050(4)(o), F.A.C. (\$100 as of the effective date of this form)

**Registration Type**

Check one:

**INITIAL REGISTRATION** - Notification of intent to:

- Construct and operate a proposed new facility.
- Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

**RE-REGISTRATION** (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
- Continue operating the facility after a change of ownership.
- Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

**Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only**

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

- All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s): \_\_\_\_\_
- No air operation permits currently exist for this facility.

**General Facility Information**

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

*All About Marble, Inc.*

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: *4538 Maire Ave*  
City: *Lakeland* County: *Polk* Zip Code: *33840*

Facility Start-Up Date (Estimated start-up date of proposed new facility.)(N/A for existing facility)

*Nov. 1992*

**Owner/Authorized Representative**

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: **Louis Valvo - President**

Owner/Authorized Representative Mailing Address

Organization/Firm:

Street Address: **P.O. Box 2434**

City: **Eaton Park**

County: **Polk**

Zip Code: **33840**

Owner/Authorized Representative Telephone Numbers

Telephone: **863-665-5700**

Fax: **same**

Cell phone (optional):

**Facility Contact (If different from Owner/Authorized Representative)**

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)

Print Name and Title: **same**

Facility Contact Mailing Address

Organization/Firm:

Street Address:

City:

County:

Zip Code:

Facility Contact Telephone Numbers

Telephone:

Fax:

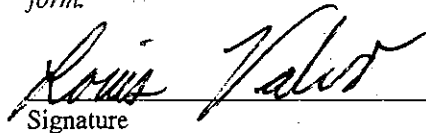
Cell phone (optional):

**Owner/Authorized Representative Statement**

This statement must be signed and dated by the person named above as owner or authorized representative

*I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof.*

*I will promptly notify the Department of any changes to the information contained in this registration form.*

  
Signature

**3-28-07**  
Date

### Material Usage Rates

If this is an **initial registration** for a cast polymer operation, provide an estimate, in pounds, of the total quantity of styrene containing materials (resin and gelcoat) expected to be used over a 12-month period. Note: the general permit limits the usage of such material to 284,000 pounds (142 tons) in any consecutive 12-months.

If this is a **re-registration** for a cast polymer operation, provide the highest 12-month total quantity, in pounds, of styrene containing materials (resin and gelcoat) used in the last five years. Indicate the 12-month period over which this usage occurred

Resin - 290 lbs each month (2005)  
Gelcoat - 20 lbs each month (2006)

### Description of Facility

Below, or as an attachment to this form, provide a description of the cast polymer operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

Molds are gelcoated, then we proceed to make the cultured marble product







# CAST POLYMER OPERATIONS



## COMPLIANCE INSPECTION CHECKLIST

**INSPECTION TYPE:** ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
 RE-INSPECTION (FUI)  ARMS COMPLAINT NO:

**AIRS ID#:** 1050293 **DATE:** 03/15/2007 **ARRIVE:** 2:03 **DEPART:** 3:45

**FACILITY NAME:** ALL ABOUT MARBLE

**FACILITY LOCATION:** 4538 Maine Ave.  
LAKELAND 33801

**RESPONSIBLE OFFICIAL:** LOUIS VALVO **PHONE:** (863)644-5055

**CONTACT NAME:** Mr. Louis Valvo **PHONE:** (813)665-5700

**REMITTANCE YEAR:** **ENTITLEMENT PERIOD:** 11/15/2001 / 11/15/2006  
 (effective date) (end date)

**PART I: INSPECTION COMPLIANCE STATUS** (check  only one box)

IN COMPLIANCE  MINOR Non-COMPLIANCE  SIGNIFICANT Non-COMPLIANCE

**PART II: CONTROL TECHNOLOGY/RECORDKEEPING REQUIREMENTS – Rule 62-210.300, F.A.C.**

(check  appropriate box(es))

1. Does the facility operate any emissions units other than the cast polymer operations and emissions units which are exempt from permitting pursuant to the criteria of paragraph 62-210.300(3)(a) or (b), F.A.C., or have been exempted from permitting under Rule 62-4.040, F.A.C.? (Rule 62-210.300(3)(c)6.a., F.A.C.)  Yes  No
2. Does the facility comply with the objectionable odor prohibition of subsection 62-296.320(2), F.A.C. and not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor?-----  Yes  No
3. Does the combined quantity of styrene containing resin and gel-coat used exceed 284,000 pounds (142 tons) in any consecutive twelve month period? (Chapter 62-210.300(3)(c)6.c., F.A.C.)-----  Yes  No
4. Does the owner/operator of the facility maintain records to document the quantity of resin and gel-coat used on a monthly basis? (Chapter 62-210.300(3)(c)6.d., F.A.C.)-----  Yes  No
5. Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years? (Chapter 62-210.300(3)(c)6.d., F.A.C.)-----  Yes  No
6. Is this cast polymer operation subject to a volatile organic compound (VOC) Reasonably Available Control Technology (RACT) emission limiting standard of Chapter 62-296.500, F.A.C.? (Rule 62-210.300(3)(c)6.b., F.A.C.)-----  Yes  No

**PART III: CONTROL/OPERATING/MAINTENANCE REQUIREMENTS – Rule 62-210.300, F.A.C.**

(check  appropriate box(es))

1. Does the owner or operator voluntarily encourage pollution prevention through such measures as training employees involved in product fabrication on methods of reducing evaporative losses by:
  - a) lessening the exposure of fresh resin surfaces to the air?-----  Yes  No
  - b) maintaining spray lay-up equipment to ensure effective application with a minimum of overspray?  Yes  No
  - c) monitoring the coating thickness to avoid excessive resin/get coat application?-----  Yes  No
  - d) implementing inventory control practices to prevent spillage?-----  Yes  No
  - e) managing cleanup solvents?-----  Yes  No
2. Does the owner or operator make every reasonable effort to conduct the specific activity authorized by the general permit in a manner that minimizes adverse effects on adjacent property or on public use of the adjacent property, where applicable, and on the environment, including fish, wildlife, natural resources, water quality, or air quality?-----  Yes  No
3. Does the owner or operator maintain the permitted facility, emission unit, or activity in good condition?  Yes  No

**PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300(4)(d)4., F.A.C.**

(check  appropriate box(es))

**A. New or Modified Process Equipment**

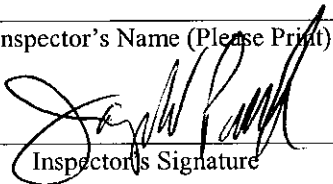
1. Since the last inspection has there been
  - a) installation of any new process equipment?-----  Yes  No
  - b) alterations to existing process equipment without replacement?-----  Yes  No
  - c) replacement of existing equipment substantially different than that noted on the most recent notification form?-----  Yes  No
  - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, F.A.C.) to the appropriate DEP or local program office?-----  Yes  No

Joseph V. Panetta

03/15/2007

Inspector's Name (Please Print)

Date of Inspection



2008

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:**



## Composites One

Date	Invoice	Ck#	Qty	Description	Material	Tax	Freight	Total
7/7	3812236	6911	2	40 lbs gelcoat	\$210.96			\$210.96
7/7	3813697	6912	2	Denatured Alcohol	\$102.50			\$102.50
8/8	3851479	6980	1	40 lbs gelcoat	\$22.57			\$22.57
			4	Hi Temp Mold Wax				
			<b>9</b>	<b>Total</b>	<b>\$336.03</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$336.03</b>
			3	40 lbs gelcoat				
			2	Denatured Alcohol				
			4	Hi Temp Wax				
			<b>9</b>	<b>Total</b>				

All About Marble  
 "Our business is the TOP!"  
 P.O. Box 2434  
 Eaton Park, FL 33840-2434

Composites One 2000

\$769.58

All About Marble  
"Our business is the TOPSI"  
P.O. Box 2434  
Eaton Park, FL 33840-2434

Composites One, LLC.					
Date	Invoice #	Ck#	Qty	Description	Total
1/6	3948113	7258	80	lbs Marble Clear Gelcoat	\$ 226.16
5/8	3408072	7527	40	lbs Marble clear gelcoat	\$ 197.78
			32	lbs alcohol	
5/8	3408065	7527	40	lbs Marble clear Gelcoat	\$ 113.08
10/4	3528638	7802	80	lbs Marble Clear Gelcoat	\$ 232.56
				<b>Total</b>	<b>\$ 769.58</b>
			240	lbs Marble clear gelcoat	
			32	lbs alcohol	

All About Marble  
 "Our business is the TOPS!"  
 P.O. Box 2434  
 Eaton Park, FL 33840-2434

**Polygard 2006**

Date	Invoice #	Ck#	Qty	Description	Price	Freight	Tax	Total
2/15	42079	7339			\$ 2,075.50	\$ 15.00		\$ 2,090.50
			50	Marble Bags	\$ 475.00			
			1	Bag of Titanium	\$ 110.50			
			2	550 gal Resin	\$ 1,490.00			
5/24	47919	7559			\$ 2,087.03	\$ 15.00	\$ 19.74	\$ 2,121.77
			1	Drum of Acetone	\$ 282.03			
			50	Marble Bags	\$ 475.00			
			1	550 gal Resin	\$ 1,330.00			
7/14	51137	7685			\$ 1,140.00	\$ 17.00		\$ 1,157.00
			50	Marble Bags	\$ 475.00			
			1	550 gal Resin	\$ 665.00			
11/3	58943	7850			\$ 1,155.00	\$ 17.00		\$ 1,172.00
			50	Marble Bags	\$ 475.00			
			1	550 gal Resin	\$ 680.00			
				<b>Total</b>				<b>\$ 6,541.27</b>
			200	Marble Bags				
			1	Bag of Titanium				
			5	550 gal Resin				
			1	Drum of Acetone				
			207	<i>Total</i>				

Permitting Application - Permit Detail and Log Permit									
<b>ARMS Facility</b>									
AREA	AIRS ID	1050293	STATUS	A	OFFICE	SWD	SW: TAMPA		
SITE NAME		ALL ABOUT MARBLE				COUNTY		POLK	
OWNER/COMPANY		ALL ABOUT MARBLE							
<b>Project</b>									
AIR Permit #	1050293	-	002	-	AG	Project #	002	CRA Reference #	105589
Permit Office	SWD (DISTRICT)				Agency Action	Effective			
Project Name	CAST POLYMER OPERATION			Desc					
Type/Sub/Des	AG	/	03	Non Title V General Permit \$100				Logged	10/17/2001
Received	10/15/2001	Issued	11/15/2001	Expires	11/15/2006	OGC	<input type="checkbox"/>		
Fee	100.00	Fee Recd	100.00	Del		Override	NONE		
<b>Related Party</b>									
Role	APPLICANT			Begin	10/17/2001	End			
Name	VALVO, LOUIS A				Company	ALL ABOUT MARBLE			
Address	P.O. BOX 2434								
City	EATON PARK			State	FL	Zip	33840	Country	U.S.A.
Phone	863-644-5055		Fax						
<b>Processors</b>									
Processor	FERNANDEZ_L			Y	Active	10/17/2001	Inactive		
								<b>Events</b>	