CAST POLYMER OPERATIONS

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 1150099 **DATE:** 07/30/2009 **ARRIVE:** ~10:30 am **DEPART:** ~11:25 am

FACILITY NAME: R & MARBLE DESIGNS, INC.

FACILITY LOCATION: 505 Paul Morris Dr

ENGLEWOOD 34223-3961

OWNER/AUTHORIZED REPRESENTATIVE: STEVE HUTCHINS **PHONE:** (941)475-3111

CONTACT NAME: Steve Hutchins **PHONE:** (941)475-3111

ENTITLEMENT PERIOD: 1/13/2008 (effective date) / 1/13/2013 (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

Susan CAmeron, ESIII, and Michael Storino, ESIII — Inspector's Name (Please Print)

07/30/2009 — Date of Inspection

Inspector's Signature

~2011 — Approximate Date of Next Inspection

COMMENTS: INS 2. Tom Woodruff, General Manager Sales & Marketing; Steve Hutchins, President; and Mrs. Hutchins, Office Manager are the only remaining employees. Business is slow; they layed off 26 workers.
Purchase records available on -site; main supplier is Ashland, Inc., 614-790-3224, account #0000117490:

Date	Acetone (lbs)	Resin (lbs)	Gelcoat (lbs)	
01/07/2009		500		
01/13/2009		2,500	450	
02/12/2009	357	500		
02/26/2009		1,960		
03/18/2009		3,000		
03/26/2009			450	
04/02/2009	357	3,000		
04/21/2009		3,000	450	
05/05/2009	357			
05/12/2009		3,000		
06/12/2009	357		466	
Total	1,428	17,460	1,816	----> ~19,300 lbs styrene containing resin/ gelcoat in 6 months (=~ 1/4 of what they did three years ago); using ~ 40,000 lbs styrene containing resin/ gelcoat in 12 consecutive months.

Acetone is used for cleanup. There is a spent acetone still used separate the solids from the liquid -> puts liquid back into drum for re-use. When they were very busy, they used the Marble Matic MM234 Series by Superior to clean tools and buckets instead of acetone. The unit is like an industrial dishwaher.
In ~2006 they went to a low HAV resin system and started using a BINKS air less application system. The latter decreases atomized material in the air therby decreasing emissions and minimizing lost material.
Process sequence:
1. Apply wax to fiberglass molds;
2. Tape;
3. Apply clear gelcoat in spray booth;
4. Mix marble dust + catalyst + resin -> pour onto mold (open face casting);
5. For sinks, place "hat" on top of bowl minimizing air to surface area therby decreasing the PTE;
6. Mechanical shake to eliminate air bubbles in cast;
7. Let cure 24 hours to ~85%; then cure on shelves several up to 6 weeks to achieve final 100%cure; and,
8. Manually grind off edges to smooth.
Maintain good housekeeping; sweep/ bag debris from floor. Mr. Hutchins applies a felt liner on the floor; ~ 2 times/year they remove the mold tables, scrape up the felt liner from the floor and replace w/ new felt liner; move mold tables back and resume production.