



Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

November 30, 2009

BY FACSIMILE

850-455-3626

Mr. Kenneth Cooley, President
Marble Works of Pensacola, Inc.
3434 West Fairfield Drive
Pensacola, Florida, 32505

Dear Mr. Cooley:

On November 5, 2009, a Department representative with the Air Resource Management Program inspected your facility, ID 0330268, to determine compliance with the air general permit. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Chris Stoll at 850/595-8300, extension 1229 or via email at christopher.stoll@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads 'Erica Mitchell'.

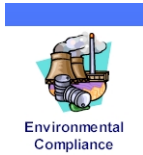
Erica Mitchell
Air Compliance Supervisor

EM/cs/c

Enclosure



CAST POLYMER OPERATIONS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0330268 **DATE:** 11/5/2009 **ARRIVE:** 11:30 AM **DEPART:** 11:41 AM
FACILITY NAME: MARBLE WORKS OF PENSACOLA INC
FACILITY LOCATION: 3434 W Fairfield Dr
 PENSACOLA 32505
OWNER/AUTHORIZED REPRESENTATIVE: KENNETH COOLEY **PHONE:** (850)453-8206
CONTACT NAME: Bud Cooley **PHONE:** (453)820-6
ENTITLEMENT PERIOD: 4/9/2006 / 4/9/2011
 (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

Chris Stoll

November 5, 2009

Inspector's Name (Please Print)

Date of Inspection

/s/

November 5, 2010

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: An un-announced inspection was conducted on November 5, 2009, of the Marble Works of Pensacola facility located at 3434 West Old Fairfield Drive in Pensacola, Escambia County. The facility is a cast polymer operation that fabricates bathroom fixtures, such as sinks, showerstalls and bathtubs.

The facility was in operation at the time of the inspection. No objectionable odors were noted outside of the building. No problems were noted with the processing portion of the facility.

At the time of the inspection, records of the styrene-containing materials could not be made available for Department inspection as required by the Air General Permit, Rule 62-210.310(4)(e)2. c., Florida Administrative Code, which states that the owner or operator shall maintain records to document the quantity of resin and gel coat used on a monthly basis. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years.

Based on the lack of availability of records at the time of the inspection, it appears that records are not being maintained as required. Subsequent to the inspection, records were provided which showed that during the past twelve months, the facility has used a total of 17,044 lbs of styrene-containing materials, which is well below the permit limit of 284, 000 pounds.

RECOMMENDATION: Records documenting monthly quantities should be maintained.