



Florida Department of  
Environmental Protection

Northwest District  
160 W. Government Street, Suite 308  
Pensacola, Florida 32502-5740

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard, Jr.  
Secretary

May 3, 2011

BY FACSIMILE  
850/455-3662

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

Dear Mr. Cooley:

On April 4, 2011, a Department representative with the Air Resource Management Program inspected your facility, ID 0330268. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in minor non-compliance at the time of the inspection for those items specifically noted in the inspection report.

Please note that authority to operate this facility expired on April 9, 2011. Rule 62-210.310(2)(c), Florida Administrative Code, states that unless the Department denies use of the air general permit, the owner or operator of an eligible facility may use the air general permit for such facility 30 days after giving notice to the Department. The Department did not receive the renewal application until April 12, 2011. Therefore the facility may have operated without a permit from April 10, 2011 to May 12, 2011.

The Department is exercising its enforcement discretion and will not pursue any additional air enforcement action at this time for failing to timely apply for permit renewal. This decision is based on the fact that due to reduced operating rates there was little to no adverse impact on the environment and the facility applied for permit renewal following the inspection.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-0662 or e-mail [jennifer.waltrip@dep.state.fl.us](mailto:jennifer.waltrip@dep.state.fl.us).

Sincerely,

A handwritten signature in cursive script that reads "Rick Bradburn".

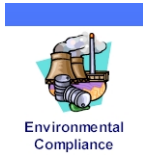
Rick Bradburn  
Air Program Administrator

RB/jw/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:** 4/7/11 **ARRIVE:** 1:44 P.M. **DEPART:** 2:34 P.M.  
**FACILITY NAME:** MARBLE WORKS OF PENSACOLA INC  
**FACILITY LOCATION:** 3434 W Fairfield Dr  
 PENSACOLA 32505  
**OWNER/AUTHORIZED REPRESENTATIVE:** KENNETH COOLEY **PHONE:** (850)453-8206  
**Email:** **Mobile:**  
**CONTACT NAME:** BUD COOLEY **PHONE:** (850)453-8206  
**Email:** **Mobile:**  
**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))

- 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
- 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
- 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
- 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
- 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
- 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

Jennifer Waltrip

April 7, 2011

Inspector's Name (Please Print)

Date of Inspection

/s/

April 2012

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** Department personnel conducted an annual air program compliance inspection on April 7, 2011 at the Marble Works facility located in Escambia County. Mr. Bud Cooley was available to assist during the inspection. Visual observations of the facility revealed all containers were sealed to prevent evaporation. There was no impact noted on any adjacent property and no objectionable odors were noted outside of the facility. The facility was not in operation at the time of the inspection.

Receipts for the purchase of resin and gelcoat were kept onsite and available for Department inspection. The combined quantity of styrene-containing resin and gel coat purchased from April 2010 to March 2011 was 12,704 pounds.

Please note, the facility may be operating without a current and valid permit. The previous permit expired on April 9, 2011. The registration form for permit renewal was not received until April 12, 2011.

Rule 62-210.310(3), Florida Administrative Code, states that the owner or operator's use of an air general permit is limited to five years. Prior to the end of the five 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 30 days prior to expiration of the facility's existing air general permit.