

Polyester Resin Plastic Products Fabrication Activities – General Permit



POLYESTER RESIN PLASTIC PRODUCTS FABRICATION



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1031030525 **DATE:** 6/19/2008 **ARRIVE:** 11:30AM **DEPART:** 1:15PM
FACILITY NAME: Statement Power Boats, LLC
FACILITY LOCATION: 4477 122nd Ave Unit K (old) ** (New location = 4350 62 Ave North. St Petersburg)
Clearwater, FL
RESPONSIBLE OFFICIAL: Nick Buis **PHONE:** 727-525-8268
CONTACT NAME: Nick Buis **PHONE:** 727- 523-8325 (Cell)
REMITTANCE YEAR: **ENTITLEMENT PERIOD:** 1/20/13
(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 polyester resin plastic products fabrication units 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)5.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 76,000 pounds (38 tons) in any consecutive twelve month period? (Chapter 62-210.300(3)(c)5.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)5.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)5.d., F.A.C.)----- ☒ Yes ☐ No
6. Is this polyester resin plastic products fabrication activity 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)5.b., F.A.C.)----- ☐ Yes ☒ No

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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

Shea Jackson

6/19/2008

Inspector's Name (Please Print)

Date of Inspection

2009

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

- *I performed an inspection on this newly permitted facility to determine if in compliance with general permit.*
- *The address on the permit notification for Statement Power Boats was found to be vacant, no one at this location. (See Photo)*
- *I went to a second address the permittee, Mark Spates had mentioned in previous conversations during permitting, where the facility may be relocating to on 45th St and 62th Ave north, adjacent to Hydro..*
- *I met with the facility contact, Mark Spates at the new location. He stated his company Advanced Composites was not in operation any more. He stated he had not operated the Advanced Composites business past December 2007. He will be the facility contact for Statement Power Boats.*
- *He stated they had relocated into the new building May 1st 2008.*

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- *Mr. Spates is working for Statement Power Boats and Nick Buis. Advanced Composites and fiberglass cars operations was not located at this site. The facility was in the process of making catamaran molds for boat manufacturing, and setting up their shop area, and repairing the ventilation stacks for the Statement Power Boats business. They were not ready to start up full boat manufacturing operations at this time. (See photos)*
- *I informed Mr. Spates the company RO, could submit letters to FDEP and copy us, P.C. A.Q. to update the information on the notifications of the Statement Power Boat permit to show the new address information could be updated in writing. It was later found to be incorrect information.*
- *I requested a copy of his record logs; he stated he did not have with him, since they had not moved into the offices at the new location yet. He called the owner of Statement Power Boats, Nick Buis as he was out of town at the time.*
- *He stated that when he returned to Tampa 6/23/2008. He would be able to get the records and send to our office, next week.*
- *I filled out the general permit summary sheets for Mr. Spates for both businesses, in regards to needed records, and need to submit changes in writing to up date notifications.*
- *I received the fax copy of the record logs for the facility resin usage on 6/23/2008. (See Fax) The facility highest month total for material usage was 9738 lbs in Feb 2008 . The combined total for total usage to date for May 2008 is 18,105 lbs. This is in compliance with the GP restrictions*
- *The facility appears to be in compliance at this time regarding emissions limitations. They did not exceed the emissions limitations for consecutive 12 month total (76,000 lbs) for the general permit. (Received fax of records on 6/23/2008)*
- ***The MNC is due to relocation prior to relocating the facility to the new address. The facility will be required to submit a new registration and pay fee. A warning letter will be issued.***

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FACILITY: Statement Power Boats, LLC		Per_ID: 2840		DISTRICT: Southwest	
ADDRESS: 4477 122nd Ave Unit K Clearwater, FL				CONTACT: Phone No: 727-573-8963	
ARMS No.: 1031030525		PERMIT NO.: 1030525-001-AG		EXPIRATION DATE: 1/20/13	
EMISSION UNIT DESCRIPTION: Polyester resin boat manufacturing facility					
INSPECTION DATE: 6/19/2008		ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or INS_____		COMPLIANCE STATUS: <input type="checkbox"/> IN <input checked="" type="checkbox"/> MNC <input type="checkbox"/> SNC	
Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly					
A. General Review:					
1.	Permit File Review				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Introduction and Entry <i>Comments: I met with Mark Spates, Facility contact.</i>				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3.	Is the Authorized Representative still: Nick Buis? <i>Comments: The owner was not on site at time of inspection</i>				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.	Is the facility contact still: Nick Buis? <i>Comments: Yes, he is the owner</i>				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B. Specific Conditions					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility operates no emissions units other than the polyester resin plastic products fabrication units 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. [62-210.300(3)(c)5.a., F.A.C.] <i>Comments: There have been no equipment changes, the facility manufacturing polyester resin boats.</i>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The combined quantity of styrene-containing resin and gelcoat used shall not exceed 76,000 pounds (38 tons) in any consecutive twelve month period. [62-210.300(3)(c)5.c. F.A.C.] <i>Comments: The highest reported consecutive twelve-month total was _18, 696_ for the month of ___May 2008_. Reviewed records for the months of <u>January 2008 – May 2008</u>.</i>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The owner or operator of the facility maintains records to document the quantity of resin and gelcoat used on a monthly basis. The owner or operator shall retain these records, available for Department inspection, for a period of at least five years. [62-210.300(3)(c)5.d. F.A.C.] <i>Comments: : The records were available back to <u>January 2008</u>. 12 month consecutive totals <input type="checkbox"/> were <input checked="" type="checkbox"/> were not available. The facility has not been in operation for 12 months at this time. A partial copy of the records is attached as an example of the record format. The facility contact stated they had started up in October 2007.</i>		

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B. Specific Conditions			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The facility complies with the objectionable odor prohibition of subsection 62-296.320(2), F.A.C. [62-210.300(4)(b)4.b. F.A.C.]</p> <p><i>Comments: An upwind/downwind survey of the facility was conducted. The observed parameters were: Downwind odor detected- <u>none</u> off property; Wind direction - <u>Southeasterly</u> Upwind odor detected-_____</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator voluntarily encourages pollution prevention through such measures as training employees involved in product fabrication on methods of reducing evaporative losses by lessening the exposure of fresh resin surfaces to the air, maintaining spray lay-up equipment to ensure effective application with a minimum of overspray, monitoring the coating thickness of avoid excessive resin/gelcoat application, implementing inventory control practices to prevent spillage, and managing cleanup solvents. [62-210.300(4)(b)4.c.]</p> <p><i>Comments: The facility had containers with solvents that are used and were covered when not in use (See photo)</i></p>
C. Selected General Conditions and Procedures			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>(Administrative Corrections. Within 30 days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include:</p> <ol style="list-style-type: none"> 1. Any change in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or 2. Any other similar minor administrative change at the facility. <p><i>Comments: The facility contact Mark Spates, and facility owner Pricilla Buis were told they need to notify the DEP by writing to correct notification information for address and phone numbers changes. Per GR - clarification of Administrative Corrections for GP, re <u>a physical address change requires new registration and would be required prior to starting up at new location.</u> The Statement Power Boats is in operation at new location at this time, should have sent in registration prior to restarting in new location. This is a violation of the permit, and a new registration notification should be submitted. I called and informed of need to submit registration, and emailed a copy of rule and form. Ms. Buis stated she would fill out and send in the week of 7/14/2008, after new address confirmed by Post Office.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Equipment Changes. In case of the installation of new process equipment, alteration of existing process equipment without replacement, or the replacement of existing process equipment with equipment substantially different than that noted on the most recent notification form, the owner or operator shall submit a new and complete general permit notification form with the appropriate fee pursuant to Rule 62-4.050, F.A.C., to the appropriate Department of Environmental Protection district office or local air pollution control program office to which the Department has delegated its permitting authority. [62-210.300(4)(d)3., F.A.C.]</p> <p><i>Comments: There have not been any equipment changes. The facility will manufacture boat operations, Mr. Spates stated they will use the two Magnum Fit guns for Gel Coat and resin application. They are looking into Epoxy boat manufacturing. (wet bagging)</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If, for any reason, the owner or operator of any facility operating under an air general permit pursuant to Rule 62-210.300(4)(a), F.A.C., does not comply with or will be unable to comply with any condition or limitation of the permit, the permittee shall immediately provide the Department with the following information:</p> <ol style="list-style-type: none"> 1. A description of and cause of noncompliance; and 2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result. <p>[62-210.300(4)(e)13., F.A.C.]</p> <p><i>Comments: There were no non compliance issues noted at this time, other then failure to notify of address change.</i></p>

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C. Selected General Conditions and Procedures			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Valid Permit Throughout the term of the general permit: a. The facility operates no emissions units other than the animal crematory and emissions units which are exempt from permitting pursuant to the criteria of Rule 62-210.300(3)(a) or (b), F.A.C.; b. The facility is not a Title V source as defined in Rule 62-210.200, F.A.C. <i>Comments: The permit is valid at this time.</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A permittee's use of a general permit is limited to five years. No later than 30 days prior to the fifth anniversary of the filing of intent to use the general permit, the owner or operator shall submit a new notice of intent which shall contain all current information regarding the facility or emissions unit. Eligibility to use the general permit is not transferable and does not follow a change in ownership of the facility or emissions unit. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The owner shall remain liable for corrective actions that may be required as a result of any violations occurring in the time after the sale or legal transfer of the facility or emissions unit, but before a new owner is entitled to use an air general permit. [General Conditions - 62-210.300(4)(e)1., F.A.C.] <i>Comments: The permit expires on 1/20/13. A new notification form is required to be submitted no later than 12/21/12.</i>
D. Other:			
Pollution Prevention Activities			
➤ P2 Handouts Provided: <input checked="" type="checkbox"/> P2 Brochure; <input type="checkbox"/> P2 Manual; <input type="checkbox"/> P2 Checklist ➤ Have any emissions reductions occurred <input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No _____ <input type="checkbox"/> Chemical Substitution; <input type="checkbox"/> Equipment Changes; <input type="checkbox"/> Process Changes <input type="checkbox"/> Chemical/Material Reuse; <input type="checkbox"/> On-site Recycling; <input type="checkbox"/> Other: _____ <i>Comments: The facility has not started into full production at this time. They are looking into Epoxy boat manufacturing. (wet bagging) to eliminate the use of polyester resins. This would be experimental if started.</i>			
Closing Conference			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Other Comments The facility needs to send in a new registration for address change to BMM.			
Inspector(s): Shea Jackson, Pinellas County, Air Quality Division			
Signature(s)			Date: June 24, 2008

CONTACT LOG? __YES_____, ACCESS? __YES_____, ARMs? __YES_____

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