



# Florida Department of Environmental Protection

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

Northwest District Branch Office  
630-3 Capital Circle Northeast  
Tallahassee, Florida 32301

October 20, 2008

SENT VIA E-MAIL  
[frank@residencialelevators.com](mailto:frank@residencialelevators.com)

Frank Panzarino  
Production Manager  
P.O. Box 1298  
Crawfordville, Florida 32326

Dear Mr. Panzarino:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The Air Program identification number for this facility is **1290099**. The permit **expires on September 8, 2013**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the facility inspection results, the Tallahassee Branch Office reported a status of **In-Compliance** for your facility.

Note that your facility compliance status may be subject to further review by the District Program Office.

The assistance you provided is appreciated. You are encouraged to review the enclosed inspection checklist and its comments section. If you have any questions, your local contact is Tracy White at (850) 488-3704 or [tracy.a.white@dep.state.fl.us](mailto:tracy.a.white@dep.state.fl.us).

Sincerely,

Marlane Castellanos  
Branch Manager

MC/tw

Enclosures

cc: Rick Bradburn, FDEP, Pensacola  
Mary Beth Curle, FDEP  
Erica Mitchell, FDEP



# SURFACE COATING OPERATIONS

## COMPLIANCE INSPECTION CHECKLIST



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

AIRS ID#: 1290099	DATE: <u>9/30/2008</u>	ARRIVE: <u>10:00</u>	DEPART: _____
FACILITY NAME: REI PLANT			
FACILITY LOCATION: 20 RESIDENTIAL DR CRAWFORDVILLE 32327-1983			
OWNER/AUTHORIZED REPRESENTATIVE: FRANK PANZARINO		PHONE: (850)926-6022	
CONTACT NAME:		PHONE:	
ENTITLEMENT PERIOD: 9/8/2008 / 9/8/2013 (effective date) (end date)			

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

IN COMPLIANCE       MINOR Non-COMPLIANCE       SIGNIFICANT Non-COMPLIANCE

**PART II: RECORDKEEPING REQUIREMENTS – Rule 62-210.300, F.A.C.**  
 (check  appropriate box(es))

1. Does the facility operate any emissions units other than the surface coating 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)4.a., F.A.C.)  Yes  No
2. Does the owner/operator of the facility maintain records to document the VOC content of the coatings and the quantity of the coatings used?-----  Yes  No
3. Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years?-----  Yes  No
4. Is the total quantity of VOC's in such coatings 44 lbs/day or less, averaged monthly?-----  Yes  No
5. Does the amount of coatings used, include solvents and thinners used in the process including those used for cleanups?-----  Yes  No

**PART III: CONTROL/OPERATING/MAINTANANCE REQUIREMENTS – Rule 62-210.300, F.A.C.**  
 (check  appropriate box(es))

1. Is/Are the surface coating operation(s) subject to a VOC Reasonably Available Control Technology (RACT) emission limiting standard of Chapter 62-296.500, F.A.C.? (Rule 62-210.300(3)(c)4.b., F.A.C.)-----  Yes  No
2. Does the facility cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor? (Rule 62.296.320(2), F.A.C.)-----  Yes  No

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

(check  appropriate box(es))

3. Does the owner/operator encourage pollution prevention through such measures as training employees involved in surface coating operations on methods of reducing VOC emissions by:
- a) maintaining spray coating equipment to ensure effective application with a minimum of overspray?  Yes  No
  - b) monitoring the coating thickness to avoid excessive coating?-----  Yes  No
  - c) considering the use of low-VOC coatings (e.g., waterborne, ultra-violet cured, or powder coatings)?  Yes  No
  - d) implementing inventory control practices to prevent spillage?-----  Yes  No
  - e) implementing management practices to reduce VOC emissions during cleanup by:
    - 1. spraying light colored coatings before dark colored coatings to reduce the number of cleaning cycles?-----  Yes  No
    - 2) recycling cleaning solvents?-----  Yes  No
    - 3) using water based cleaners?-----  Yes  No

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

**A. New or Modified Process Equipment**

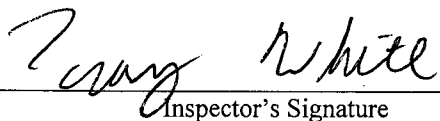
1. Since the last inspection has there been
- a) installation of any new process equipment?-----  Yes  No
  - b) alterations to existing process equipment without replacement?-----  Yes  No
  - c) replacement of existing equipment substantially different than that noted on the most recent notification 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

Tracy White

9/30/2008

Inspector's Name (Please Print)

Date of Inspection



6-12 months

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:**

I arrived at the site. I did not note any objectionable odors.

I met with Frank Panzarino, Production Manager. We first observed the "Cab Assembly" room. This room is where wood parts are trimmed to fit and assembled. The room had a building wall vent with an exhaust fan in it. Next the "Komo" CNC router machine was observed. The machine had dust collection ports that connected and exhausted to a set a bag filters in an shed located immediately outside the building.

Next the spray booth room was observed. It was not in operation. The makeup air flowed through filters in the entry doors. Room air was filtered through two "Chemco" filter assemblies that were located on the opposite side of the room and the filters vented to a common stack on top of the paint booth building.

Afterwards the chemical storage sheds were observed. One shed was for fuel storage. The other shed stored the chemicals used in the operation: Laquer Thinner 154-4709; Sherwood Lacure T70 ft1; Sherwood Sealer T60-ft2; Laquer Thinner K119. Most frequently used chemicals were packaged in 5 gallon containers. Containers were sealed.

No objectionable odors were noted on the backside of the building where the paint booth stack is located. However it was not in operation during the inspection.

Mr. Panzarino and I discussed paint booth filter replacement frequency. He asked for recommendations on the operation. I recommended establishing a baseline rate for filter replacement based on production rate (product usage), filter saturation rate and manufacturer recommendations. He explained that he monitors the filters and replaces them as needed.

The facility had mostly paved areas for traffic flow. No excessive fugitive emissions were observed.

The recordkeeping system was observed. Records were maintained and available. Monthly usage in gallons and VOC emissions appeared to be calculated and maintained.

A "VOC Report" was provided and it included "Total lb. VOC per month." The report started in August 2008. Total VOC emissions for August 2008 were 502.97 lbs/month. For September 2008 the total was 964.55 lbs/month.