



# Florida Department of Environmental Protection

Northwest District Office  
2353 Jenks Avenue  
Panama City, Florida 32405-4389

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

April 19, 2012

BY ELECTRONIC MAIL  
[rsistrunk77@bellsouth.net](mailto:rsistrunk77@bellsouth.net)

Mr. Rudy Sistrunk  
Marine Inland Fabricators  
1725 Buchanan Street  
Panama City, Florida 32409

Dear Mr. Sistrunk:

On March 21, 2012, a Department representative with the Air Resource Management Program inspected the Marine Inland Fabricators facility ID 0050092. 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 C. Mark Sumner at 850/767-0046, or by email at [mark.c.sumner@dep.state.fl.us](mailto:mark.c.sumner@dep.state.fl.us).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cliff Wilson III'.

Clifford D. Wilson III, P.E.  
Panama City Branch Administrator

CDW/ms

Enclosure

c: Ms. Mary Beth Curle, FDEP Pensacola ([mary.beth.curle@dep.state.fl.us](mailto:mary.beth.curle@dep.state.fl.us))  
Ms. Carol Melton, FDEP Pensacola ([carol.melton@dep.state.fl.us](mailto:carol.melton@dep.state.fl.us))



# SURFACE COATING OPERATIONS



## COMPLIANCE INSPECTION CHECKLIST

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

<b>AIRS ID#:</b> 0050092	<b>DATE:</b> <u>3/21/2012</u>	<b>ARRIVE:</b> <u>10:46</u>	<b>DEPART:</b> <u>11:52</u>
<b>FACILITY NAME:</b> MARINE INLAND FABRICATORS			
<b>FACILITY LOCATION:</b> 1725 BUCHANAN ST PANAMA CITY 32409-1482			
<b>OWNER/AUTHORIZED REPRESENTATIVE:</b> RUDY SISTRUNK		<b>PHONE:</b> (850)265-1383	
<b>Email:</b> rsistrunk77@bellsouth.net		<b>Mobile:</b> (850)625-4173	
<b>CONTACT NAME:</b>		<b>PHONE:</b>	
<b>Email:</b>		<b>Mobile:</b>	
<b>ENTITLEMENT PERIOD:</b> 3/7/2009 / 3/7/2014 (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))

- 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
- 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
- Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years?-----  Yes  No
- Is the total quantity of VOC's in such coatings 44 lbs/day or less, averaged monthly?-----  Yes  No
- 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))

- 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
- 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?-----  NA  Yes  No

C. Mark Sumner

3/21/12

Inspector's Name (Please Print)

Date of Inspection



March 2013

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** The facility owner maintains a spread sheet to track the amounts of coating materials, thinners, and solvent used at the facility. A review of these records from January 2011 to February 2012 revealed that the highest usage of coatings was in October 2011 with a daily average 4.52 gallons. According to the provided MSDS sheets this corresponds to 14 lbs of VOCs. The owner encourages pollution prevention by maintaining the equipment, monitoring coating thickness with a coating gauge, and implementing inventory control practices to prevent waste and spillage. All cleaning solvents are recycled back into the coatings as thinner.

According to the owner, the use of low VOC coatings and or waterbased cleaners in not possible for the marine applications required by this facility.

As observed during this inspection, there are currently several vessels being constructed, but no painting was being performed at this time. According to the owner all painting associated with the curent vessels under construction has and will take place inside the curtained enclosure on the east side of ther facility. The enclosure is designed to contain the material that results from the sandblasting and painting operations on the vessels. No signs of sandblast media or paint overspray were observed outside of the curtained enclosure.