

Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

July 30, 2008

Mr. Sean Hassett, President Tropix Marble Company 5741 Zip Drive Fort Myers, Florida 33905

Dear Mr. Hassett:

This is to acknowledge that your notification of intent to use the authority of Rule 62-210.310 to operate your facility was received on June 27, 2008. We have assigned ARMS No. <u>0710175-004</u> to this facility.

As you know, pursuant to Florida Statutes section 403.814, authority to operate under general permits commences thirty days after receipt of the registration form unless you have been notified by this office that your facility has not shown entitlement to operate pursuant to the rule provisions.

For your information, authority to operate pursuant to Rule 62-210.310 expires after 5 years. Therefore, a new registration form must be received no later than 5 years after the date your notice was received as indicated above. If your general permit rule conditions require testing, such testing must be completed within the time frame specified in the rule.

If you have any additional questions, please contact Dickson Dibble at 850/921-9586.

Sincerely,

Sandra F. Veazey, Chief Bureau of Air Monitoring and Mobile Sources

SFV/pg

cc: Mr. Sherrill Culliver, South District

2212

RECEIVED

CAST POLYMER OPERATIONS AIR GENERAL PERMIT REGISTRATION FORM

JUL 0 1 2008

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

& Mobile Sources

Instructions: To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form) 0710175-004 Registration Type Check one: INITIAL REGISTRATION - Notification of intent to: Construct and operate a proposed new facility. Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit). **RE-REGISTRATION** (for facilities currently using an air general permit) - Notification of intent to: Continue operating the facility after expiration of the current term of air general permit use. Continue operating the facility after a change of ownership. Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C. Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box. All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s): Non-Title V. (FESOP) Air Construction Print 0710175-003-AC No air operation permits currently exist for this facility. General Facility Information Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.) Sean Hassett / Tropix Marble Co.

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.) Facility Location (Provide the physical location of the facility, not necessarily the mailing address.) Street Address: 5741 Zip Drive Zip Code: 33905

DEP Form No. 62-210.920(1)(e) Effective: January 10, 2007

Facility Start-Up Date (Estimated start-up date of proposed new facility.) (N/A for existing facility)

Owner/Authorized Representative						
Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this						
air general permit.)						
Print Name and Title: Sean Hassett President						
Owner/Authorized Representative Mailing Address						
Organization/Firm: Tropix Marble Street Address: 5741 Zip Dr						
City: Ft Myers County: Lee Zip Code: 33905						
Owner/Authorized Representative Telephone Numbers						
Telephone: 239 334-2371 Fax: 239 334-0116 Cell phone (optional): 239 229-7189						
Cell phone (optional): 239 229-7189						
Facility Contact (If different from Owner/Authorized Representative)						
Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)						
Print Name and Title:						
Facility Contact Mailing Address						
Organization/Firm:						
Street Address:						
City: Zip Code:						
Facility Contact Telephone Numbers						
Telephone: Fax:						
Cell phone (optional):						
` ` `						
Owner/Authorized Representative Statement						
This statement must be signed and dated by the person named above as owner or authorized representative						
I, the undersigned, am the owner or authorized representative of the owner or operator of the facility						
addressed in this Air General Permit Registration Form. I hereby certify, based on information and						
belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for						
use of this air general permit and that the statements made in this registration form are true, accurate						
and complete. Further, I agree to operate and maintain the facility described in this registration form so						
as to comply with all applicable standards for control of air pollutant emissions found in the statutes of						
the State of Florida and rules of the Department of Environmental Protection and revisions thereof.						
Livill mounth, notify the Donatt and of my shown at the information and in this way.						
I will promptly notify the Department of any changes to the information contained in this registration form.						
Join.						
/ 3/ #						
Sen Hassell 6/17/08						
Signature Date						

DEP Form No. 62-210.920(1)(e) Effective: January 10, 2007

Material	'Usage	Rates

If this is an **initial registration** for a cast polymer operation, provide an estimate, in pounds, of the total quantity of styrene containing materials (resin and gelcoat) expected to be used over a 12-month period. Note: the general permit limits the usage of such material to 284,000 pounds (142 tons) in any consecutive 12-months.

If this is a re-registration for a cast polymer operation, provide the highest 12-month total quantity, in pounds, of styrene containing materials (resin and gelcoat) used in the last five years. Indicate the 12-month period over which this usage occurred.

Description of Facility

Below, or as an attachment to this form, provide a description of the cast polymer operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

Process Description and Emission Estimates

Process Description

Tropix Marble Company, Incorporated is applying for an FDEP minor source air construction permit for their cast/cultured marble manufacturing facility at 5741 Zip Drive, Fort Myers (Lee County), located as shown in Attachment 1. The facility, which currently operates under a General Air permit, manufactures simulated cultured marble countertop and bathroom fixture products via semi-closed casting and/or molding techniques from styrene-based resins and gelcoats.

The facility dimensions and site layout, along with the general location of the various activities are shown in Attachment 1. The manufacturing building is approximately 165 feet long, 120 feet wide at maximum, and 26 feet high at roof peak. The approximate western 25% of the building consists of non-emitting activities, such as raw materials warehousing and finished goods storage. The remaining areas of the building will be dedicated to cast marble manufacturing, finishing, mold care, and related activities.

The manufacturing process begins with the application of a gelcoat containing typically less than 48% (wt) styrene to a mold. The gelcoat is applied by conventional airless air assisted spray layup gun, a procedure performed in the interior of the building in the Gruber GF-14-7-8 gelcoat booth located as shown in Attachment 1. The use of the airless air assisted spray layup gun results in a minimum of overspray. The booth is vented via a fan which exhausts through and upward above the roof. The 30-inch diameter exhaust fan is rated at 11900 cfm @ 0.25" static pressure, and has an unobstructed upward flow of air. Filters in the booth exhaust prevent the emission of particulate overspray. The booth is equipped with a manometer which measures the pressure drop across the filters, and the filters are replaced as necessary and in accordance with manufacturer specifications.

During periods of lower ambient temperatures, the molds may be passed through a "curing tunnel" to ensure proper and timely curing of the resin. The tunnel is heated by natural gas; no alternative fuel can be used. The maximum heating rate of the oven is 200,000 Btu/hr; as use of the oven is limited to cold days, the typical annual gas usage is low.

The polyester resin, which typically contains 30-35% (wt) styrene (but may contain higher or lower levels for specific physical properties), is mixed with an inert solid filler such as titanium dioxide or calcium carbonate in approximately a 5:1 inert:resin ratio in mixing pots of various sizes (10 to 30 gallons) at a mixing station, shown in Attachment 1. After thorough mixing, a small quantity (approximately 1 to 2% by weight of the resin) of methyl ethyl ketone peroxide is added to catalyze the resin. VOC emissions from the mixing activity are negligible, since the mixing pot is covered as feasible except when material is being added, mixed or removed, and styrene has a low vapor pressure (0.1156 psia) at the (essentially constant) room temperature.

The filled resin material is then transferred to and poured into the previously gelcoated molds in a "semi-closed molding" operation located in the "casting area." Some molds are completely closed after resin addition, while the majority have one exposed surface.

When the resin mixture is hardened, the mold is separated from the cured part. The mold is cleaned and prepared for return to the start of the process in the "setup" area; repair of damaged molds before re use, and construction of new molds for a new part, is conducted in the "mold repair" area as shown in Attachment 1.

The gelcoat booth exhaust fan will be the primary source of the VOC emissions. Horizontal firing wall fans in the open mixing/casting area remove the hot building air from the working area and to a lesser degree exhaust limited VOC species from the mixing/casting operations, as will be discussed later. Since the resin mixture is poured into rather than sprayed onto the molds, there is no potential for particulate generation from these activities.

Final grinding, shaping, and sanding of the fixtures as needed after removal from the mold is performed in the Gruber Systems grinding booth, equipped with a Torrit filter system, and in the finishing area. These production related activities will be performed using hand held tools to minimize the generation of particulate emissions. Any particulates generated in the grinding booth are controlled by the integral dust collector, which returns the filtered air back to the room. The grinding booth does not have an outside exhaust point. Additional particulate control in the general finishing area is maintained by frequent sweeping and cleaning of work surfaces, floors, and tools. Good particulate control is necessary to prevent contamination of the resin and gelcoating surfaces in the adjacent areas.

From the grinding and finishing areas the product is cleaned, inspected, and prepared for shipping/delivery to the purchaser for installation in the field.

Florida Department of Environmental Protection Cash Receiving Application (CRA) Cashlisting by Deposit #: 281756 thru 281756 Printed: 6/27/2008 5:22:41 PM - Page 18

RECEIVEL

JUL 0 1 2008

Cashlisting: Deposit No:

69388 281756

Cashlist Area:

Date Deposited: 06/27/2008

3755

Description: DIV OF AIR RESOURCES MGMT.

Contact: E. WALKER

Bureau of Air Worldoring & Mobile Sources

	et Transmittal 2 · 49246	Dep DDN 484208	Receipt Number 629560	Pre- Numbered Rec <u>eipt</u>	Name TROPIX MARBLE	Check Number		Reference Account 0710175-08 4 713/2008- P0	Payment Number 888326	Remittance Number 787548	<u>Fund</u> PFTF	Grant
		•			Object Code 002272 Subtotal:		\$100.00	• /				1
0022	5 49246	484203	629555		S2 YACHTS, INC.	62058	\$816.86	1110074	888318	787543	APCTF	
·					Object Code 002275 Subtotal:		\$816.86					
0022	78 49246	484207	629559		ABATEMENT & DEMOLITION SERVICE	10351	\$300.00	48481	888324	787547	APCTF	
					Object Code 002278 Subtotal:		\$300.00					
					Cashlisting 69388 Total:		\$1,216.86					

DEP ROUTING	JUL 07 X008	
TO: Dick Dibble Bureau of Air Monitoring & Mo Air General Permit Program MAIL STATION #5500 - MAGNOL	Mobile Sources	
PLEASE PREPARE REPLY FOR:	COMMENTS:]
SECRETARY'S SIGNATURE	TROPIX MARBLE COMPANY DEP FILE No. 0710175-003-AC	
DIV/DIST DIR SIGNATURE	DEI TRE 180. 07 10170 000 710	
MY SIGNATURE		
YOUR SIGNATURE		·
DUE DATE:		
ACTION/DISPOSITION:		
DISCUSS WITH ME		
COMMENTS/ADVISE		
REVIEW AND RETURN		
SET UP MEETING	,	
FOR YOUR INFORMATION		
HANDLE APPROPRIATELY		
INITIAL AND FORWARD		
SHARE WITH STAFF		
X FOR YOUR FILES		
FROм: <u>Carter Endsley</u> / South Distri	ct_Date: 07/2/08 PHONE: 239.332.6975	



Florida Department of Environmental Protection

South District Office P.O. Box 2549 Ft. Myers, Florida 33902-2549 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

NOTICE OF PERMIT CANCELLATION

CERTIFIED MAIL 7007 1490 0003 7209 3493 RETURN RECEIPT REQUESTED

Sean Hassett, President TROPIX Marble Company 5741 Zip Drive Fort Myers, Florida 33905 Lee County - AP Cultured Marble Manufacturing DEP File No: 0710175-003-AC

Dear Mr. Hassett;

This letter is to acknowledge receipt of your email communication dated June 4, 2008 to my attention, regarding your request to terminate your "FESOP" Construction Permit No. 0710175-003-AC.

It is understood that you have applied for an Air General Permit instead, due to economic business decline that demands lower production. You advise that this smaller production results in an approximate 85% reduction in emissions from the original FESOP Construction Permit application captioned above. Based upon these values, you have requested to revert back to an Air General permit plan that you have operated under in the past.

You have now applied direct to the Florida D.E.P. in Tallahassee (Attn: Mr. Dick Dibble) for the "Air General" permit.

Please be advised that your "FESOP" Air Construction Permit No. 0710175-003-AC is being changed to expire effective July 30, 2008. (Per Rule 62-210.310(2)(b)1, "Any existing, individual air operation permit(s) authorizing operation of the facility must be surrendered by the owner or operator, effective upon the first day of the use of the air general permit").

<u>WARNING</u>: Any violation of the terms of the Air General Permit (GP) and/or exceeding the limits of the permit, can result in significant fees ("penalty") or loss of permit to operate.

Sincerely,

Carter B. Endsley, P.E.

Air Permitting Manager

CBE/jw

cc: √Dick Dibble - FDEP-Air Resources Management, Tallahassee

Tom John, P.E. – Tom John Engineering Inc.

Satyal Ajaya -- FDEP-Fort Myers

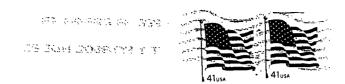
Sherrill Culliver - FDEP-Fort Myers

Susan Machinski - FDEP-Fort Myers

"More Protection, Less Process" www.dep.state.fl.us

TROPIX MARBLE COMPANY

2900 Hanson St. Fort Myers, FL 33916



FDEP

Receipts

po Box 3070

Tallahassee, FL 32315-3070

3231593070

Infludation Halan Hall and million and hall and and