



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHWEST DISTRICT OFFICE
470 HARRISON AVENUE
PANAMA CITY, FLORIDA 32401

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

February 15, 2013

BY ELECTRONIC MAIL
dennis@thenaturallight.com

Mr. Dennis Thompson
Plant Manager
The Natural Light
Post Office Box 16449
Panama City, Florida 32406

Dear Mr. Thompson:

On February 14, 2013, a Department representative with the Air Resource Management Program inspected The Natural Light Facility ID 0050054. 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 mark.c.sumner@dep.state.fl.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "M Mathews".

Michael Mathews
Environmental Manager

MM/ms

Enclosure

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

AIRS ID#: 0050054	DATE: <u>2/14/13</u>	ARRIVE: <u>9:12</u>	DEPART: <u>10:15</u>
FACILITY NAME: THE NATURAL LIGHT			
FACILITY LOCATION: 1020 ARTHUR DR LYNN HAVEN 32444-1683			
OWNER/AUTHORIZED REPRESENTATIVE: DENNIS THOMPSON*		PHONE: (850)265-0800	
Email: dennis@thenaturallight.com		Mobile:	
CONTACT NAME: KARREN TOLODXI*		PHONE: (850)265-0800	
Email: karren@thenaturallight.com		Mobile:	
ENTITLEMENT PERIOD: 7/21/2012 / 7/21/2017 (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?----- N/A Yes No

C. Mark Sumner

2/14/2013

Inspector's Name (Please Print)

Date of Inspection



Februart 2014

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I met with Mr. Dennis Thompson, the plant manager. No objectionable odors or visible emissions were noted at the time of this inspection. The Natural Light uses four paint booths. Three smaller booths each equipped with a 2500 CFM exhaust fan and one larger booth equipped with a 4690 CFM exhaust fan. The outlets for these booths each have a spun glass filter that is changed when it becomes visibly coated. A review of the filter change log for each booth revealed that the filters in the smaller booths are changed most working days, and the filters in the large booth are changed weekly. This facility uses a variety of stains, paints, and lacquers to coat and finish the end products. A review of the coating and solvent records revealed that the facility uses the information provided by the supplier in addition to the quantity purchased/used to calculate VOC emissions from the coating activities. The logs were reviewed from December 2011 to January 2013, and the highest daily average was 31.25 lbs/day for August 2012. The next two months with the highest daily average were November 2012 with 24.35 lbs/day and May 2012 with 23.52 lbs/day. These amounts include the solvents and thinners used in the process and those used for cleanups. The operator of this facility encourages pollution prevention by maintaining the equipment and using HVLP spray guns when possible; the employees are trained to minimize overspray and to prevent product spillage and waste. Many of the coatings now being used were chosen for their low VOC content, and all waste cleaning solvents are kept in sealed containers and properly disposed of with an appropriate waste handler.