



**POLYESTER RESIN PLASTIC PRODUCTS
FABRICATION**



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1030440 **DATE:** 8/3/2006 **ARRIVE:** 2:30PM
DEPART: _____

FACILITY NAME: Cooper Marine, Inc.

FACILITY LOCATION: 340 17th Avenue South
St. Petersburg, FL

RESPONSIBLE OFFICIAL: Ron Cooper **PHONE:** 727-367-5004

CONTACT NAME: Norm Swain **PHONE:** 727-455-3362

REMITTANCE YEAR: **ENTITLEMENT PERIOD:** / 12/15/08
(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

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

Inspector's Name (Please Print)

8/3/2006

Date of Inspection

Inspector's Signature

8/2007

Approximate Date of Next Inspection

COMMENTS: *Mr. Cooper is the authorized representative and owner*

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FACILITY: Cooper Marine, Inc.		Per_ID: 964	DISTRICT: Southwest
ADDRESS: 340 17th Avenue South St. Petersburg, FL			CONTACT: Phone No: 727-367-5004
ARMS No.: 1030440	PERMIT NO.: 1030440-002-AG		EXPIRATION DATE: 12/15/08
EMISSION UNIT DESCRIPTION: Boat Fabrication with polyester resins and gelcoats			
INSPECTION DATE: August 3, 2006		ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or INS_____	COMPLIANCE STATUS: <input checked="" type="checkbox"/> IN <input 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		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments: I met on site with the facility contact and manager Norm Swain.</i>			
3.	Is the Authorized Representative still: <u>Ron Cooper</u>?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments: Mr. Cooper is the authorized representative and owner</i>			
4.	Is the facility contact still: Norm Swain?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments: I met on site with the facility contact and manager Norm Swain</i>			
B. Specific Conditions			
I N C	M N C	S N C	
<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: The facility continues to operate only the polyester resin plastic products fabrication of boats. I observed the MSD sheets for the resins, gelcoats and solvents in use on site.</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 <u>September 2005 and July 2006</u> for the month of <u>44,109 lbs and 41,586 lbs</u>. Reviewed records for the months of <u>September 2005 – August 2006</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>2003</u>. 12 month consecutive totals <input checked="" type="checkbox"/>were <input type="checkbox"/>were not available. (No copies available at this time, no copy machine on site). The facility is working on one boat at this time. The completion of one boat takes ~ 2- 6 months. The resin quantities observed on site were as follows 4 drums of the COR61-531, and 5 -5 gal containers of POLYGARD – gelcoats.</i>

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I N	M N C	S N C	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 off site</u>; Wind direction - <u>Southeasterly</u> Upwind odor detected- <u>None</u></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: I called and spoke to Mr. Cooper. He stated they had purchased new spray equipment last year to reduce emissions. He stated they also gauge the resin applications to specifics of the coast guard, and they attempt to get a 50:50 ratio of cloth to resin.</i></p>

I N	M N C	S N C	C. Selected General Conditions and Procedures
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Administrative Corrections. Within 30 days of any changes requiring corrections to information contained in the notification form, the owner or operator shall notify the Department in writing. Such changes shall include: a. Any change in the name of the authorized representative or facility address or phone number; or b. Any other similar minor administrative change at the facility or emissions unit. [62-210.300(4)(d)3., F.A.C.]</p> <p><i>Comments: There have been no changes at this time.</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: They have Glascraft guns with a pump ratio of 11:1. They spray at 35 – 50 PSI air assisted. Glascraft air assisted guns, not using pressurized catalyst tank. The MEK is metered into the resin during operation more efficient mixing with resin.</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. [62-210.300(4)(e)13., F.A.C.] <p><i>Comments: There were not any non-compliance issues observed or reportable at this time, no emission limitation exceedance were found during inspection.</i></p>

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I N C	M N C	S N C	C. Selected General Conditions and Procedures
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Valid Permit</p> <p>Throughout the term of the general permit:</p> <p>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.;</p> <p>b. The facility is not a Title V source as defined in Rule 62-210.200, F.A.C.</p> <p><i>Comments: The permit is valid at this time no other emission units on site, and not using quantizes over 76,000 lbs, which would require a Title V permit.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p>[General Conditions - 62-210.300(4)(e)1., F.A.C.]</p> <p><i>Comments: The permit expires on 12/15/08. A new notification form is required to be submitted no later than 10/16/08.</i></p>
D. Other:			
Closing Conference I spoke with Mr. Swain regarding the facility status.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Other Comments: The facility is in compliance at this time.			
Inspector(s): Shea Jackson, Pinellas County, Air Quality Division			
Signature(s)			Date:

CONTACT LOG? ___ YES ___, **ACCESS?** ___ YES ___, **ARMs?** ___ YES _____

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