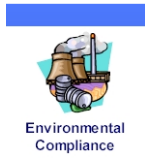




**POLYESTER RESIN PLASTIC PRODUCTS  
FABRICATION**



**COMPLIANCE INSPECTION CHECKLIST**

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

**AIRS ID#:** 1030440      **DATE:** 9/18/2008      **ARRIVE:** 1:30 PM      **DEPART:** 2:00PM

**FACILITY NAME:** Cooper Marine, Inc.

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

**RESPONSIBLE OFFICIAL:** Ron Cooper      **PHONE:** 727-455-3362

**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)

September 18, 2008

\_\_\_\_\_  
Date of Inspection

\_\_\_\_\_  
Inspector's Signature

~ 2009

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:** See the attached Pinellas County inspection report form for additional information. The facility does not use non atomized spray equipment.

**Polyester Resin Plastic Products Fabrication Activities – General Permit**

<b>FACILITY:</b> Cooper Marine, Inc.		<b>Per_ID:</b> 964	<b>DISTRICT:</b> Southwest
<b>ADDRESS:</b> 340 17th Avenue South St. Petersburg, FL		<b>CONTACT:</b> Phone No: 727-455-3362	
<b>ARMS No.:</b> 1030440	<b>PERMIT NO.:</b> 1030440-002-AG	<b>EXPIRATION DATE:</b> 12/15/08	
<b>EMISSION UNIT DESCRIPTION:</b> Boat Fabrication with polyester resins and gelcoats			
<b>INSPECTION DATE:</b> September 18,2008	<b>ARMS INSPECTION TYPE:</b> <input checked="" type="checkbox"/> INS2 or INS_____	<b>COMPLIANCE STATUS:</b> <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			
<b>A. General Review:</b>			
1.	Permit File Review	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Introduction and Entry  <i>Comments: I did not meet on site with Norm Swain, he was not available. I met with Michael Shepard and tour the facility. He called Mr. Swain, and he stated he would fax or mail records for my review</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3.	<b>Is the Authorized Representative still: Ron Cooper?</b> <i>Comments: Yes, but he is rarely at the facility site.</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4.	<b>Is the facility contact still: Norm Swain?</b> <i>Comments: YES, but he was not on site, was launching boat.</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>B. Specific Conditions</b>			
<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: There are no other emission units on site other then the polyester resin boat productions.</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>34,834 lbs</u> for the month of November 2008 2008. Reviewed records for the months of <u>August 2007 – August 2008.</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 <b>at least five years</b> . [62-210.300(3)(c)5.d. F.A.C.]  <i>Comments: The records are available back to 2004_. 12 month consecutive totals <input checked="" type="checkbox"/>were <input type="checkbox"/>were not available. A partial copy of the records is attached as an example of the record format.</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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.]  <i>Comments: An upwind/downwind survey of the facility was conducted. The observed parameters were: Downwind odor detected- <u>No odors off site</u>; Wind direction - <u>Southeasterly</u> Upwind odor detected- <u>None</u></i>

**Polyester Resin Plastic Products Fabrication Activities – General Permit**

I N C	M N C	S N C	
			<b>B. Specific Conditions</b>
<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: Mr. Swain stated the employees area trained in methods of proper spraying techniques. The facility still uses the Glascraft guns with an 11:1 pump ratio, and 40 lb PIS for Resin, and 20:1 pump ration with 60 PSI for the Gelcoats. This would be considered atomized spraying technique, with higher volatility rate. This in not considered non atomized spraying.</i></p>
			<b>C. Selected General Conditions and Procedures</b>
<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:</p> <p>a. Any change in the name of the authorized representative or facility address or phone number; or</p> <p>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><b>Equipment Changes.</b> 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: The facility has no equipment changes still uses the GlasCraft resin application gun. These are atomized spray guns.</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"> <li>1. A description of and cause of noncompliance; and</li> <li>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.</li> </ol> <p>[62-210.300(4)(e)13., F.A.C.]</p> <p><i>Comments: There were no non compliance issues at this time.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>Valid Permit</b></p> <p>Throughout the term of the general permit:</p> <ol style="list-style-type: none"> <li>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.;</li> <li>b. The facility is not a Title V source as defined in Rule 62-210.200, F.A.C.</li> </ol> <p><i>Comments: The permit is valid for the site activities and emission units on site. This is not a Title V source.</i></p>

**Polyester Resin Plastic Products Fabrication Activities – General Permit**

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>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. [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 11/15/08. I informed Mr. Swain, the facility needs to submit the renewal for permit prior to the 11/15/2008 date. He stated they had received the renewal notification in the mail last month, and he had forward the paper work to Mr. Cooper. MR. Swain stated he would check with him to assure the notification was being processed.</i></p>

**Polyester Resin Plastic Products Fabrication Activities – General Permit**

**D. Other:**

**Pollution Prevention Activities**

- P2 Handouts Provided:  P2 Brochure;  P2R2 Manual;  P2 Checklist
- P2 *Booklet Waste Reduction Assistance for Fiberglass Industry* was given to facility staff.
- Have any emissions reductions occurred  Yes /  No \_\_\_\_\_
  - Chemical Substitution;  Equipment Changes;  Process Changes
  - Chemical/Material Reuse;  On-site Recycling;  Other: \_\_\_\_\_

**Comments:** *The facility has changed to other resins to lower VOC's. Mr. Swain will submit an MSD sheet.*

Closing Conference: *I informed, Mr. Swain, that there did not appear to be any non compliance issues at this time.*  Yes  No

Other Comments: *I informed the facility they appear to be in compliance at this time. He stated he would fax copy of the records.*

**Inspector(s):** Shea Jackson, Pinellas County, Air Quality Division

**Signature(s)**

Date: September 22,2008

CONTACT LOG? \_\_YES \_\_, ACCESS? \_\_YES \_\_, ARMS? \_\_YES \_\_

**Cooper Marine, Inc.**  
340 17th Avenue South, St. Petersburg



**Project Id:** 62460      **Permit No:** 1030440-002-AG      **Arms Number:** 0440

**Inspector:** Shea Jackson      **Inspection Date:** 9/18/08

**Source (EU):** Boat Fabrication with polyester resins and gelcoats

**Description:** -The facility uses the glascraft resin choppers. These are not considered to be non atomized resin application, due to 11:1 pump ratio and PSI ranges 40 - 60

**Cooper Marine, Inc.**  
340 17th Avenue South, St. Petersburg



**Project Id:** 62460      **Permit No:** 1030440-002-AG      **Arms Number:** 0440

**Inspector:** Shea Jackson      **Inspection Date:** 9/18/08

**Source (EU):** Boat Fabrication with polyester resins and gelcoats

**Description:** -The facility uses the two covered areas for boat mfg. There were no boats currently being constructed.