



# CAST POLYMER OPERATIONS

## COMPLIANCE INSPECTION CHECKLIST



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

<b>AIRS ID#:</b> 0330277	<b>DATE:</b> <u>05/23/2007</u>	<b>ARRIVE:</b> <u>0900</u>
<b>FACILITY NAME:</b> 21ST CENTURY MARBLE		
<b>FACILITY LOCATION:</b> 1029 S Fairfield Dr PENSACOLA 32506		
<b>RESPONSIBLE OFFICIAL:</b> KENNETH HIGDON		<b>PHONE:</b> (850)456-5963
<b>CONTACT NAME:</b> Kenneth Higdon		<b>PHONE:</b> (850)456-5963
<b>REMITTANCE YEAR:</b>	<b>ENTITLEMENT PERIOD:</b> 5/28/2006 / 5/28/2011 <small>(effective date) (end date)</small>	

**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 cast polymer 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)6.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 284,000 pounds (142 tons) in any consecutive twelve month period? (Chapter 62-210.300(3)(c)6.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)6.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)6.d., F.A.C.)-----  Yes  No
6. Is this cast polymer operation 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)6.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

Michael Gordon

05/23/2007

Inspector's Name (Please Print)

Date of Inspection

/s/

05/2008

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** This facility manufactures cultured marble products. Bags of ground cultured marble are mixed with a styrene containing resin. The mixture is then poured into various molds and shaped into sinks, bathtubs, and related items. Gelcoats that contain styrene are also used as part of the product.

The facility was not in operation at the time of the inspection. Mr. Ken Higdon, owner, and I discussed several aspects of the permit including the required fees. Mr. Higdon provided the required records containing his purchases for resin and gelcoat. The file contained the necessary records from March 2006 to May 2007. A summary of these records is provided in the attached table. The Material Safety Data Sheets (MSDS) obtained from a previous inspection contained the following information for both the resin and the gelcoat:

Resin - Advanced Plastics; Trade name STYPOL 040-5845; 9.5374 lb/gallon; styrene is 28.48% by wt.

Gelcoat - Advanced Plastics; Trade name STYPOL 040-4917; styrene is 38.43% by wt.

The facility used 29,000 lbs of resin and 1540 pounds of gelcoat in a period of 451 days. The Permit limit is 284,000 lbs of styrene containing materials. Annualized use is approximately 23,470 lbs of resin and 1,246 lbs of gelcoat. Total potential styrene emissions are equal to approximately 7,163 pounds per year or 3.58 tons per year.

21st Century Marble is operating within the required limits of the Cast Polymer Operations Air General Permit.

As discussed at the time of the inspection, the Air General Permit fee is \$100.00 and is only due, along with a new registration form, once every five years at permit renewal. For this facility, submittal of a renewal application will be due April 3, 2011. As long as no changes occur to the facility that would trigger a re-registration (Rule 620210.300(4)(d)4., Florida Administrative Code), the permit is valid until that time.

Please note that all facility records are required to be available for inspection at all times. Failing to comply with this permit condition is a violation of the agreement between your facility and the State. Please ensure that facility personnel have access to these records in order to present them to the Department at the time of site inspections.

#### Resin and Gelcoat Use

Invoice Date	Resin Use	Gelcoat Use
March-2006	2000	80
April-2006	2500	160
May-2006	2500	160
June-2006	4000	260
July-2006	1500	120
August-2006	1000	120
September-2006	2000	80
October-2006	1500	120
November-2006	1000	40
December-2006	1000	0
January-2007	2000	0
February-2007	2500	40
March-2007	3000	160
April-2007	1000	80
May-2007	1500	120
Totals	29000	1540