



REGION 4

ATLANTA, GA 30303

January 12, 2024

SENT VIA ELECTRONIC MAIL

Bernard Davis
Information Technology and Engineering Director
Mincey Marble Manufacturing, Inc.
1940 New Harvest Road
Gainesville, Georgia 30507
bdavis@minceymarble.com

Dear Bernard Davis:

Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4, South Air Enforcement Section, for the inspection conducted at the Mincey Marble Manufacturing, Inc. facility, located in Gainesville, Georgia, on November 30, 2023.

If you have any questions, please contact me at (404) 562-9134, or by email at taylor.kevin@epa.gov.

Sincerely,

**Taylor,
Kevin**

Digitally signed by
Taylor, Kevin
Date: 2024.01.12
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Kevin Taylor
Environmental Engineer
South Air Enforcement Section

Enclosure

ENCLOSURE A
INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: Mincey Marble Manufacturing, Inc. (Mincey Marble)
Location (Address): 1940 New Harvest Road
Gainesville, Georgia 30507

Inspection Date: November 30, 2023

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

ICIS-Air Number: GA0000001313900155

EPA Investigator(s)/Inspector(s):

1. Kevin Taylor, Environmental Engineer, EPA Region 4
2. Sharron Porter, Environmental Engineer, EPA Region 4

State/Local Investigator(s)/Inspector(s):

1. Jack Habib, Environmental Engineer
Georgia Environmental Protection Division (Georgia EPD)

Person(s) Contacted at Facility (Name and Title):

1. Bernard Davis, Information Technology and Engineering Director

Report Prepared by: Kevin Taylor

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Reinforced plastic composites manufacturer of synthetic marble showers and bath products.
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Title V Operating Permit Permit No. 3088-139-0155-V-02-0

3. Air permit issuance date.	02/04/2020
4. Air permit expiration date.	02/03/2025
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Hazardous Air Pollutants (HAPs) Volatile Organic Compounds (VOCs)
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	40 CFR 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	HAPs in coatings and resins are emitted during application.
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Fabric filters are used in the spraying areas for particulate control.

B. Process Description (provide narrative or attach description provided by the company or excerpts from the permit)

The facility uses open and closed molding operations to manufacture synthetic marble goods. Gelcoat is applied to molds via non-atomized spraying. Polyester resin matrix is then poured into the molds, and the cured products are finished (sanding, grinding, polishing, etc).

III. INSPECTION ACTIVITIES

Activity	Yes	Comment
	No	
	NA	
Opening Meeting		
1. Date and time entered the facility.	Yes	The EPA inspectors entered the facility on November 30, 2023, at 9:30 am (EST).

2. Credentials presented to facility personnel (include name and title).	Yes	Upon arrival, the EPA inspectors presented their EPA credentials to the facility personnel.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Yes	The EPA inspectors held an opening conference with Bernard Davis, representing Mincey Marble, and Jack Habib with the Georgia EPD. The purpose and objectives of the inspection were explained during the opening conference. The EPA inspectors pointed out that they were conducting a partial compliance evaluation that was targeting compliance with 40 CFR 63 Subpart WWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Participants of the opening conference filled out an attendance sheet with contact information.
4. Discussed safety issues.	Yes	The EPA inspectors discussed with the facility the personal safety equipment needed to conduct the inspection and any emergency procedures for the facility.
5. Discussed which records to be reviewed.	Yes	The EPA inspectors identified records to be reviewed for the evaluation and provided a listing of those records to the facility. Those records included a listing of materials used in the process with associated safety data sheets, the most current Notification of Compliance Status Report, material usage information and records on VOC and HAP emissions on a monthly and 12 month rolling average basis. To make the process more efficient, Mincey Marble was given the option of sending the information electronically following the inspection.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Yes	The EPA inspectors discussed the overall inspection plan, which was primarily focused on observing the entire synthetic marble manufacturing process, from start to finish,

		with an emphasis on areas where the application of the coatings and resins take place.
7. Discussed facility policy regarding photographs or video (if applicable).	No	N/A
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	No	N/A
9. Discussed CBI.	Yes	The EPA inspectors requested that anything that the facility considers to be CBI be identified. The facility would also have an opportunity to review the EPA inspection report for CBI content prior to finalizing it. Any information identified as CBI would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed and the time period reviewed.	Yes	The facility agreed to send the requested records for review to Kevin Taylor electronically by emailed as a follow up to the inspection.
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr).	N/A	The walk-through inspection started at approximately 10:25 am. Mincey Marble's manufacturing process primarily produces shower units. The first area observed was the gel spray booth area. The facility is permitted for seven booths but only employs six. The gel spray booths are controlled by fabric filters that are changed out every day. Manometers are installed on the fabric filters to monitor the pressure across the filter and the manufacturer recommends changing out

Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	the filters at 0.5 inches water column (in. WC). However, Mincey Marble stated that the filters are changed out daily so the filters never reach the 0.5 in. WC pressure threshold. The gel coat used for the spraying process are stored in 55-gallon drums. The facility possesses a large number of different product molds for its operation that are created internally. The gel spray coating is applied to the product mold and there is a 10-minute minimum curing time before the next step can be performed. In this initial production area, four of the six gel spray booths were observed (Nos. 1-4). Gel spray booth No. 5 is in the process of being automated and gel spray booth No. 6 is located in the mold shop. The next area observed was the matrix pouring process. The matrix is a mixture of materials that includes calcium carbonate, resin, and a resin activator. The matrix, which resembles cake batter, is poured into the gel coated mold and the mold is air cured. After curing, the bottoms of the shower pans are sanded manually to level them out. The gel coat side of the pan is then finished, buffed, and have flanges added. For the shower panels, following curing, the backs of the panels are sanded using large belt sanders and the gel coat side is finished with a either a gloss finish or matte finish. Following the observation of the production line, the mold shop was observed. This is the area where molds are cleaned or created. The No. 6 spray booth is located in the mold shop and is used to spray the molds with an orange tooling gel. Fiberglass is used to make the working molds and the master molds, and a
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		tooling resin is used in the creation of these fiberglass molds.
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher).	Y	The equipment used for air pollution control are fabric filters for the control of particulates. The filters are changed out daily and have a manometer to record the pressure across the filter. The logs for the fabric filter change outs were reviewed on site.

Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.		
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	No	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	No	There were no emissions which were visible to the naked eye.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	No	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	

24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N/A	
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N/A	
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N/A	
Closing Meeting		

28. Conducted a closing meeting.	Yes	The EPA inspectors conducted a closing meeting on November 30, 2023, at approximately 11:25 am EST with Bernard Davis, representing Mincey Marble, and Jack Habib with the Georgia EPD. The close out meeting was conducted at the facility's main office.
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	No	Although the CBI procedures were explained in the opening meeting and at the start of the inspection. A CBI declaration was not made at the time of the inspection. The facility was advised that an inspection report would be sent to them for a CBI review following the inspection.
31. Discussed observations.	Yes	The EPA inspectors discussed the observations made during the inspection and stated that, although no concerns were noted at the time, a review of the records received still had to be conducted following the onsite portion of the inspection.
32. Discussed next steps, if applicable?	Yes	The EPA inspectors stated that an inspection report would be the next step in the process which would cover observations made during the day of the inspection.
33. Date and time inspection concluded.	Yes	The inspection concluded on November 30, 2023, at approximately 11:40 am EST.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature: _____

Taylor, Kevin

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EPA Supervisor Signature & Title

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Date Report Finalized: