



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803-3767

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

Electronically sent – Received Receipt Requested
dahofferth@creativefoammedicalsystems.com

SPCD-AIR-14-1918

AIR RESOURCE PROGRAM COMPLETENESS REVIEW

APPLICANT: Creative Foam Medical Systems

AUTHORIZED REPRESENTATIVE: Doug Hofferth,
Engineering/Operations Manager

ADDRESS: 4800 NW 5th Street,
Ocala, FL 34482

DATE RECEIVED: 12/15/14

PROJECT No.: 0830178-001-AC

SITE: Creative Foam Medical Systems

PROJECT: Creative Foam–Foam Products

Your application for this project has been received and reviewed by this office. It was received on December 15, 2014. We have assigned Project No. 0830178-001-AC to the application. The application is incomplete. Please respond to the following items. Evaluation of your application will be delayed until all the requested information has been received.

The following items are needed to complete the application:

- 1) Please provide additional justification/documentation that the VOC and HAP emissions from the enclosed molding process are negligible. The application stated the VOC and HAP in the polyols and isocyanates are consumables that become chemically bound in the final product. What is the basis (for example, EPA documents or reference material) for this statement?
- 2) In the application, a conditional exemption using Rule 62-210.300(3)(a)27., F.A.C., is claimed for the mold surface coating operation. Two conditions must be met.
 - a. Use of chemicals with VOC content >5% must be less than 6 gallon per day, averaged monthly. Based on the information in the application we calculate that 4.14 gallons per day (1.2 lbs/hr (stated max rate) x 24 hrs/day x 6.95 lbs/gals) is the maximum amount that can be used. This is less than 6.0 gallons per day. Do you agree with our calculations?
 - b. The operations are not subject to any unit-specific limitation or requirement. The surface coating operation must be a separate activity from the emission unit in order to be an exempt activity. The mold surface coating operation is not mentioned on the process flow diagram for the polyurethane mixing machine.
 - i. If it is not a separate operation, please indicate where the mold surface coating operation takes place on the flow diagram for the polyurethane mixing machine.
 - ii. If it is a separate activity, please provide a flow diagram for the mold surface coating operation.
- 3) In the application it was stated, “The SIC code that best describes Creative Foam is 3081 (Unsupported Plastics Film and Sheet) and the NAICS Code is 326113 (Unsupported Plastics Film and sheet (except Packaging) Manufacturing).” We agree that the insulation product is flexible. However, we think SIC Code 3086 (Plastics Foam Products) and NACIS Code 326150 (Urethane

and Other Foam Product (except Polystyrene) Manufacturing is a more appropriate description. Did you consider these codes? Why should we not use these codes in the Department's database?

- 4) The applicable conditions of 40 CFR 63, Subpart OOOOOO will become specific conditions of the permit. Do you believe that any of these regulations do not apply to your operation? Should other regulations in 40 CFR 63, Subpart OOOOOO become specific conditions?
- i. §63.11417(c)(1)(i): You must have a compliance certification on file by the startup of the closed molding operation. This certification must contain the statements in paragraph (c)(1), (2), or (3) of §63.11417(c), as applicable, and must be signed by a responsible official.
 - ii. §63.11417(c)(1)(ii): This facility will not be allowed to use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(2).
 - iii. §63.11417(d): You will be required to maintain records of the information used to demonstrate compliance, as required in §63.11416(f). You must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site.

Your application indicated you were requesting an air construction and an air operation be issued at the same time. The construction permit needs to be issued first. After compliance with the permit conditions has been demonstrated (records, testing, etc.), an application for an operation permit with the appropriate processing fee will need to be submitted.

Pursuant to Section 120.60(1), F.S., and Rule 62-4.055, F.A.C., the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Please provide the additional information within 30 days of the date you receive this letter.

Submit the requested information to Jeff Rustin, P.E., jeff.rustin@dep.state.fl.us. Reference the project application number 0830178-001-AC in your correspondence. If you have any questions or would like to schedule a meeting to discuss this RAI or your draft response to it, please contact Jeff Rustin, P.E., at 407-897-2930 or by email.

Sincerely,



F. Thomas Lubozynski, P.E.
Waste and Air Resource Programs Administrator

December 23, 2014

Date

cc: Jeff Rustin, P.E., FDEP – Central District, jeff.rustin@dep.state.fl.us
Bryan Petriko, P.E., August Mack Environmental, Inc., BPetriko@Augustmack.com
Alic Bent, Senior Technical Engineer, August Mack Environmental, ABent@Augustmack.com