



August 22, 1996

26005.F21.816

Mr. Willard Hanks
Review Engineer
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station 5505
Tallahassee, Florida 32399-2400

RECEIVED

SEP 3 1996

BUREAU OF
AIR REGULATION

Foamex, L.P., Orlando
Proof of Publication of Public Notice of Intent to Issue
Permit No. AC 48-214902B
AIRS I.D. No. 0950225-003-AC

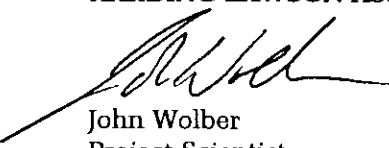
Dear Mr. Hanks:

Per our phone conversation Thursday morning (8/22), please find attached the revised "Proof of Publication" of the "Public Notice of Intent to Issue Permit Modification" for Foamex, L.P. This revised version correctly references the permit number, AC 48-214902B. Please disregard the original version which referenced HLA's internal project number for Foamex, L.P.

Please do not hesitate to contact us if you any questions or comments or if you require any additional information.

Yours very truly,

HARDING LAWSON ASSOCIATES



John Wolber
Project Scientist

JMW/tbm/26005W38.DOC

cc: Mr. Alan Zahm, FDEP Central District
Mr. Dennis Nester, OCEPD
Mr. Tom Burghardt, Foamex International, Linwood, PA
Mr. Tony Grosso, Foamex International, Linwood, PA
Mr. Rafael Rodriguez, Foamex, L.P., Orlando
Ms. Kay Rykowski, HLA, Orlando

The Orlando Sentinel

Published Daily
\$213.68

State of Florida } S.S.
COUNTY OF ORANGE

Before the undersigned authority personally appeared BEVERLY C. SIMMONS, who on oath says that he/she is the Legal Advertising Representative of The Orlando Sentinel, a daily newspaper published at ORLANDO in ORANGE County, Florida; that the attached copy of advertisement, being a PUBLIC NOTICE OF in the matter of DRAFT PERMIT NO. AC 48-214902B was published in said newspaper in the issue of 08/10/96 Court,

Affiant further says that the said Orlando Sentinel is a newspaper published at ORLANDO in said ORANGE County, Florida, and that the said newspaper has heretofore been continuously published in each Week Day and has been entered as second-class mail matter at the post office in ORLANDO in said ORANGE County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

The foregoing instrument was acknowledged before me this 22 day of August, 19 96, by BEVERLY C. SIMMONS who is personally known to me and who did take an oath.

(SEAL)



SHERIN L. MILLER
561 Corina Exp. #80460
Bonded By Service Ins
No. 00562244

[[Personally Signed]] [[Other I.D.]]

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit No. AC 48-214902B (0950225-003-AC)
Foamex L.P. Flexible Polyurethane Foam Manufacturing Plant
Orange County

statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, Florida Administrative Code.
The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday except legal holidays, at the Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301. Telephone: 904/488-1344, FAX: 904/922-6979, COR1084952 - AUG.10.1996

The Department of Environmental Protection (Department) gives notice of its intent to issue a modification to the air construction permit for Foamex L.P. 1351 Gemini Boulevard, Orlando, Orange County, Florida 32821. The modification will allow methylene chloride emissions at the facility to increase from 280 to 365 tons per year (TPY) for up to 5 years. After period, the methylene chlo ride emissions cannot exceed \$180 TPY or the applicable Maximum Allowable Air Emission Rate (MAAER) for a period of 14 (fourteen) days from the date of publication of the Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received results in a significant change in the DRAFT Permit Modification, the Department will issue a Revised DRAFT Permit Modification and requires, if applicable, another Public Notice.
In addition, any person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.
The petition shall contain the following information: (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action.



August 8, 1996

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Mr. Willard Hanks
Review Engineer
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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AUG 12 1996

BUREAU OF
AIR REGULATION

Foamex, L.P., Orlando
DRAFT Modification of Permit & Public Notice of Intent to Issue
Permit No. AC 48-214902B
AIRS I.D. No. 0950225-003-AC

Dear Mr. Hanks:

Foamex, L.P. (Foamex) and Harding Lawson Associates (HLA) have received and reviewed the subject DRAFT Modification of Permit and Public Notice of Intent to Issue for Foamex's Orlando Facility. We have four minor comments regarding the draft modification. These comments do not affect or change the emissions as presented in the draft modification or public notice.

COMMENT 1

Rafael Rodriguez is the new Plant Manager of Foamex's Orlando facility. Please address the final Modification of Permit, and all future correspondence, to Mr. Rodriguez.

COMMENT 2

The rebond foam production process at the facility currently consists of two roof exhaust fans serving two molds. Foamex will be adding a third mold and fan to this process. Foamex requests that Specific Condition No. 1, as presented on Page 2 of the draft modification, be corrected to read as follows:

“... and **three** roof exhaust fans **servicing three molds in the rebond foam production process ...”**

COMMENT 3

Specific Condition No. 2 has always limited methylene chloride usage, not emissions. As presented in the draft modification, this condition limits methylene chloride usage prior to May 31, 2001, and limits methylene chloride emissions after May 31, 2001. Even though all of the methylene chloride used in the Slabstock Process is emitted, Foamex requests, that to be consistent, Specific Condition No. 2 in the modification be revised to limit methylene chloride usage only. The following revised wording is suggested:

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Mr. Willard Hanks
Bureau of Air Regulation
Florida Department of Environmental Protection
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Harding Lawson Associates

"The methylene chloride used as a blowing agent in the Slabstock Polyurethane Foam Process at the facility shall not exceed **720,000 pounds (360.0 tons)** during any twelve month period **from the date of this amendment until May 31, 2001. This time is needed to install the alternate manufacturing technology that will replace part of the methylene chloride blowing agent with carbon dioxide. After May 31, 2001, methylene chloride usage as a blowing agent shall not exceed 360,000 pounds (180.0 tons) during any 12 month period or methylene chloride emissions shall not exceed the standard established by an applicable Maximum Achievable Control Technology (MACT) determination, whichever is most restrictive. ...**"

COMMENT 4

The emissions contained in Specific Condition No. 4 of the permit are presented as estimated emissions for inventory purposes and are not presented as limits. In the draft modification, the footnote to the total estimated annual methylene chloride emissions limits methylene chloride emissions after May 31, 2001, to 180 TPY or MACT, whichever is most restrictive. Since the methylene chloride emissions are limited by the usage limits imposed by Specific Condition No. 2 and Specific Condition No. 4 presents all other emissions as estimated emissions, Foamex requests that the footnote be revised to present the methylene chloride emissions after May 31, 2001 as estimated emissions. The following revised wording is suggested:

"*After May 31, 2001, estimated emissions do not exceed 180 TPY or MACT, whichever is most restrictive."

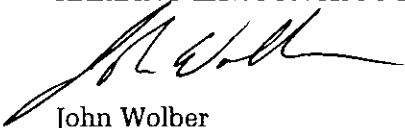
CLOSING

As previously stated, the comments above do not affect the emissions as presented in the draft modification and public notice. Therefore, upon confirmation from you that these comments do not constitute a significant change in the DRAFT Modification of Permit and will not require FDEP to reissue the draft modification package, we will go ahead with the publication of the Public Notice of Intent to Issue.

Please do not hesitate to contact us if you any questions or comments or if you require any additional information.

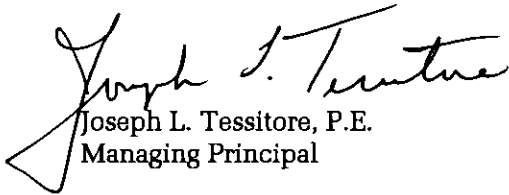
Yours very truly,

HARDING LAWSON ASSOCIATES


John Wolber
Project Scientist

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Bureau of Air Regulation
Florida Department of Environmental Protection
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Harding Lawson Associates



Joseph L. Tessitore, P.E.
Managing Principal

JMW/JLT/tbm/26005W34.DOC

cc: Mr. Alan Zahm, FDEP Central District
Mr. Dennis Nester, OCEPD
Mr. Tom Burghardt, Foamex International, Linwood, PA
Mr. Tony Grosso, Foamex International, Linwood, PA
Mr. Rafael Rodriguez, Foamex, L.P., Orlando
Ms. Kay Rykowski, HLA, Orlando