



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

July 30, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Douglas L. Terrill
Plant Manager
Foamex L.P.
1351 Gemini Boulevard
Orlando, Florida 32821

Dear Mr. Terrill:

Re: DRAFT Modification of Permit
Permit No. AC 48-214902B (0950225-003-AC)

Enclosed is one copy of the DRAFT Permit Modification for the changes to the air construction permit No. AC48-214902A for your Orlando, Florida flexible polyurethane foam manufacturing plant. The Intent to Issue and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit.

Please submit any comments you may wish to have considered concerning the Department's proposed action to the Bureau of Air Regulation, New Source Review Section, at the above address. If you have any questions, please call Willard Hanks at (904)488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/wh/t

Enclosure



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

In the Matter of an
Application for Permit
Modification by:

DRAFT Permit No. AC48-214902B
AIRS I.D. No. 0950225-003-AC
Orange County

Foamex L.P.
1351 Gemini Boulevard
Orlando, Florida 32837

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection gives notice of its intent to issue an air construction permit modification (copy of DRAFT Permit Modification enclosed) for the changes to the facility as detailed in the application specified above, for the reasons stated below.

The applicant, Foamex L.P., applied on June 10, 1996, to the Department of Environmental Protection for a modification to a previously issued air construction permit for their flexible polyurethane foam manufacturing facility located at 1351 Gemini Boulevard, Orlando, Orange County, Florida 32837.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-212, Florida Administrative Code (F.A.C.). This source modification is not exempt from permitting procedures. The Department has determined that a permit modification is required to operate the facility as proposed.

The Department intends to issue this Permit Modification based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely affect air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE PERMIT MODIFICATION." The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a

Draft Permit No. AC48-214902B
AIRS I.D. No. 0950225-003-AC
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newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400, (Telephone: 904/488-1344; FAX 904/922-6979) within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit modification.

The Department will issue the FINAL Permit Modification in accordance with the conditions of the enclosed Draft Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE PERMIT MODIFICATION." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, 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, 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, Mail Station 35, Tallahassee, Florida 32399-3000, (Telephone: 904/488-9730; FAX 904/487-4938). Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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;
- (d) A 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 intent. 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 receipt of this intent 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, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



C. H. Fancy, P.E., Chief
Bureau of Air Regulation

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

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

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 that period, the methylene chloride emissions cannot exceed 180 TPY or the applicable Maximum Available Control Technology standards, when adopted, whichever is most restrictive. A new mold and fan will be installed in the rebond foam process to increase production. Toluene diisocyanate emissions will increase from 0.02 to 0.04 TPY. These modifications do not require a Best Available Control (BACT) determination. Theoretically, a lifetime of exposure (70 years) to the maximum ambient air concentration resulting from 360 TPY of methylene chloride emissions from this facility would increase the cancer risk by 1.3 in a million. For maximum emission rates of 360 TPY for 5 years and 180 TPY thereafter, as limited by the proposed modification, the lifetime increase in cancer risk is less than 1 in a million.

The Department will issue the FINAL Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the DRAFT Permit Modification issuance action for a period of 14 (fourteen) days from the date of publication of this 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 require, 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

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

Draft Permit No. AC48-214902B
AIRS I.D. No. 0950225-003-AC
Page Two

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; (d) A 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:

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

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

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Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
FAX: 407/897-2966

Orange County Environmental Protection Department
2002 East Michigan Street
Orlando, Florida 32806
Telephone: 407/836-7400
FAX: 407/836-7499

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Bureau of Air Regulation, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

DRAFT

August XX, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Douglas L. Terrill
Plant Manager
Foamex L.P.
1351 Gemini Boulevard
Orlando, Florida 32821

Dear Mr. Terrill:

Re: Modification of Permit
Permit No. AC 48-214902B
AIRS I.D. No. 0950225-003-AC

The Department is in receipt of your June 3 letter requesting the referenced air construction permit for your flexible polyurethane foam manufacturing facility located at 1351 Gemini Boulevard, Orlando, Orange County, Florida 32821, be modified. The requested modifications are: to allow an increase in methylene chloride emissions from 280 to 365 tons per year (TPY), limit methylene chloride emissions to a maximum of 180 TPY after this 5 year period when the new manufacturing technology that will use carbon dioxide as some of the blowing agent is in service, and increase rebond foam production by installing a new fan and mold. These requests are acceptable, with conditions, and permit No. AC 48-214902A is modified as follows:

SPECIFIC CONDITION NO. 1

From:

The enhanced exhaust systems shall meet or exceed the following specifications. The systems shall include: two 2.8 ft. diameter by 125 ft. high stacks, each handling 30,000 acfm of air; three roof exhaust fans with 3.6 ft. diameter 53 ft. high stacks, each handling 50,000 acfm of air; and two roof exhaust fans with 2 ft. diameter by 53 ft. high stacks, each handling 15,000 acfm of air. The two 125 ft. high stacks shall be equipped with stack sampling facilities meeting the specifications listed in Rule 62-297.345, F.A.C. Tank No. 10 shall be equipped with a pressure/vacuum relief valve.

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Foamex, L.P.
Page Two

To:

The enhanced exhaust systems shall meet or exceed the following specifications. The systems shall include: two 2.8 ft. diameter by 125 ft. high stacks, each handling 30,000 acfm of air; three roof exhaust fans with 3.6 ft. diameter 53 ft. high stacks each handling 50,000 acfm of air; and **three roof exhaust fans serving two molds in the rebond foam production process** with 2 ft. diameter by 53 ft. high stacks, each handling 15,000 acfm of air. The two 125 ft. high stacks shall be equipped with stack sampling facilities meeting the specifications listed in Rule 62-297.345, F.A.C. Tank No. 10 shall be equipped with a pressure/vacuum relief valve.

SPECIFIC CONDITION NO. 2

From:

The methylene chloride used as a blowing agent in the Slabstock Polyurethane Foam Process at the facility shall not exceed 551,192 pounds (275.6 tons) during any twelve month period. The other chemicals used in the manufacturing process at the facility shall not exceed the following quantities during any twelve month period: 1,000,000 lbs/yr (500 TPY) polymer; 15,000,000 lbs/yr (7,500 TPY) polyol; and 10,000,000 lbs/yr (5,000 TPY) toluene diisocyanate. Cleanup solvent losses shall not exceed: 20 gallons/month isopropyl alcohol; 5,770 lbs/yr 1,1,1,-trichloroethane with silicone lubricant; and 1,000 lbs/yr mineral spirits.

Compliance with this condition shall be determined by records of purchases, inventory changes, and receipts for chemicals disposed of off site. The permittee shall maintain a log showing the amount of chemicals used each month to document compliance with these limitations.

To:

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 emissions shall not exceed 360,000 pounds (180.0 tons) during any 12 month period or the standard established by an applicable Maximum Achievable Control Technology (MACT)

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Mr. Douglas L. Terrill
Foamex, L.P.
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determination, whichever is most restrictive. The other chemicals used in the manufacturing process at the facility shall not exceed the following quantities during any twelve month period: 1,000,000 lbs/yr (500 TPY) polymer; 15,000,000 lbs/yr (7,500 TPY) polyol; and 10,000,000 lbs/yr (5,000 TPY) toluene diisocyanate. Cleanup solvent losses shall not exceed: 20 gallons/month isopropyl alcohol; 5,770 lbs/yr 1,1,1,-trichloroethane with silicone lubricant; and 1,000 lbs/yr mineral spirits.

Compliance with this condition shall be determined by records of purchases, inventory changes, receipts for chemicals disposed of off site, and any procedures specified in an applicable MACT **determination.** The permittee shall maintain a log showing the amount of chemicals used each month to document compliance with these limitations.

SPECIFIC CONDITION NO. 4

From:

For inventory purposes, the estimated emissions from this facility (based on emissions factors listed in the application, the limitations on operation time, and chemical usage) are:

AVERAGE EMISSIONS FROM FACILITY OPERATIONS:

Chemicals	Emissions	
	lbs/hr	TPY
methylene chloride	2,223	280
1,1,1-trichloroethane	2.5	1.86
toluene diisocyanate	0.375	0.42

MAXIMUM POTENTIAL EMISSIONS FROM INDIVIDUAL OPERATIONS ARE ESTIMATED TO BE:

Operation/chemical	Emissions	
	lbs/hr	TPY
I. Slabstock Polyurethane Foam Production/toluene diisocyanate	0.37	0.40
II. Foam Line Stack/ methylene chloride	1,400	165.36

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Mr. Douglas L. Terrill
Foamex, L.P.
Page Four

III. Long Bun Storage Room Stack/ methylene chloride	816.7	96.5
IV. Foam Fabrication Operations/ methylene chloride	5.3	15.4
1,1,1-trichloroethane	2.5	1.86
V. Rebond Polyurethane Foam Production/ toluene diisocyanate	0.0046	0.02
VI. Tank Storage (Tank No. 10) methylene chloride	0.66	2.92
VII. Steam Boiler products of combustion (Less than 1 lb/hr of all pollutants)	Trace amounts of the normal	
VIII. Environmental Heating products of combustion (less than 1 lb/hr of all pollutants)	Trace amounts of the normal	

To:

For inventory purposes, the estimated emissions from this facility (based on emissions factors listed in the application, the limitations on operation time, and chemical usage) are:

AVERAGE EMISSIONS FROM FACILITY OPERATIONS:

Chemicals	Emissions	
	lbs/hr	TPY
methylene chloride	2,224	365*
1,1,1-trichloroethane	2.5	1.86
toluene diisocyanate	0.380	0.44

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

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Foamex, L.P.
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MAXIMUM POTENTIAL EMISSIONS FROM INDIVIDUAL OPERATIONS ARE ESTIMATED TO BE:

Operation/chemical	lbs/hr	Emissions TPY
I. Slabstock Polyurethane Foam Production/toluene diisocyanate	0.37	0.40
II. Foam Line Stack/ methylene chloride	1,400	216
III. Long Bun Storage Room Stack/ methylene chloride	816.7	126
IV. Foam Fabrication Operations/ methylene chloride	6.3	19.6
1,1,1-trichloroethane	2.5	1.86
V. Rebond Polyurethane Foam Production/ toluene diisocyanate	0.0092	0.04
VI. Tank Storage (Tank No. 10) methylene chloride	0.70	3.03
VII. Steam Boiler products of combustion (Less than 1 lb/hr of all pollutants)		Trace amounts of the normal
VIII. Environmental Heating products of combustion (less than 1 lb/hr of all pollutants)		Trace amounts of the normal

SPECIFIC CONDITION NO. 5

From:

To confirm the emission factors used in the application, the permittee shall measure the emissions from both slabstock process stacks for methylene chloride by EPA Method 18, as described in 40 CFR 60, Appendix A. If the measured emission factors are significantly different from the ones used in the application, the applicant shall remodel the emissions from the facility using the emission factors established by the stack test to confirm that the Acceptable Ambient Concentration from methylene chloride is not exceeded. Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then sources

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Mr. Douglas L. Terrill
Foamex, L.P.
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may be tested at less than capacity (i.e. less than 90% of the maximum operating rate allowed by this permit); in this case, subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. The stack test and modeling results shall be submitted to the Department with the application for permit to operate required by Specific Condition No. 8. (Rule 62-4.070, F.A.C.)

To:

To confirm the emission factors used in the application, the permittee shall measure the emissions from both slabstock process stacks for methylene chloride by EPA Method 18, as described in 40 CFR 60, Appendix A, **prior to January 1, 1997**. If the measured emission factors are significantly different from the ones used in the application, the applicant shall remodel the emissions from the facility using the emission factors established by the stack tests **and update the Risk Assessment for methylene chloride**. Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then sources may be tested at less than capacity (i.e. less than 90% of the maximum operating rate allowed by this permit); in this case, subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. The stack test and modeling results shall be submitted to the Department with the application for permit to operate required by Specific Condition No. 8. (Rule 62-4.070, F.A.C.)

A copy of this letter shall be attached to permit No. AC 48-214902 and shall become a part of that permit.

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/wh/t

To: Clair Fancy
From: Willard Hanks *WH*
Date: July 30, 1996
Subject: Modification of Permit
Foamex L.P.

Attached for your approval is a proposed modification to the construction permit for Foamex's flexible polyurethane foam manufacturing facility located in Orlando, Orange County, Florida.

The modification will:

- o allow the permittee to increase methylene chloride emissions from 280 to 365 TPY for a period of 5 years,
- o extended the permit to allow time to install a carbon dioxide system which will replace some of the methylene chloride used in the process,
- o after the installation of the carbon dioxide system (by the end of the 5 year period), the methylene chloride emissions will be reduced to a maximum of 180 TPY,
- o the rebond foam operation will be relocated to an adjacent area and the production will be increased by the addition of another mold and exhaust fan.

Modeling results of the reconfigured plant shows the Ambient Reference Concentration for methylene chloride is exceeded during the five year period of high emissions. Theoretically, a lifetime of exposure (70 years) to the maximum ambient air concentration resulting from 360 TPY of methylene chloride emissions from this facility would increase the cancer risk by 1.3 in a million. For maximum emission rates of 360 TPY for 5 years and 180 TPY thereafter, as limited by the proposed modification, the lifetime increase in cancer risk is less than 1 in a million.

I recommend your approval and signature of the proposed modification.

CHF/wh/t

Attachments

P 339 251 131

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	Doug Terrill
Street & Number	FOAMPEX LP
Post Office, State, & ZIP Code	Orlando, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	ACUS-21490237-31-96
	0950235-003-AC

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
 - 2. Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
 Douglas L. Terrill
 Foampek, LP
 1351 Gemini Blvd
 Orlando, FL 32821

4a. Article Number
P 339-251-131

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
8-2-96

5. Signature (Addressee)
[Signature]

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.

RECEIPT