



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

January 10, 1996

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

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

Dear Mr. Terrill:

Re: Modification of Permit No. AC 48-214902  
Polyurethane Foam Manufacturing Facility

The Department hereby modifies the Specific Conditions related to hours of operation and use of cleanup solvent at your plant in Orlando, Orange County, Florida.

Specific Condition 2.

From:

The chemicals used at this facility shall not exceed the following quantities during any 12 month period: 513,090 lbs/yr (256.6 TPY) methylene chloride; 1,000,000 lbs/yr (500 TPY) polymer; 15,000,000 lbs/yr (7,500 TPY) polyol; and 10,000,000 lbs/yr toluene diisocyanate. Cleanup solvent losses shall not exceed: 2 gallons/month isopropyl alcohol; 5,770 lbs/yr 1,1,1-trichloroethane with silicone lubricant; and, 1,000 lbs/yr mineral spirits.

To:

The chemicals used at this facility shall not exceed the following quantities during any 12 month period: 513,090 lbs/yr (256.6 TPY) methylene chloride; 1,000,000 lbs/yr (500 TPY) polymer; 15,000,000 lbs/yr (7,500 TPY) polyol; and 10,000,000 lbs/yr 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.

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Specific Condition 3.

From:

Maximum operation times for each operation at this facility are:

<u>Operation</u>	<u>hr/day</u>	<u>days/week</u>	<u>weeks/year</u>	<u>hrs/year</u>
Slabstock Process	3	5	52	780
Rebond Process	24	6	52	7488
Foam Fabrication				
Operations	16	6	52	4992
Tank Storage	24	7	52	8760
Steam Boiler	24	7	52	8760
Environmental Heating				400

The permittee shall maintain a log to show compliance with this condition. The log shall be kept for a minimum of 5 years and made available for Department inspection upon request.

To:

Maximum operation times for each operation at this facility are:

<u>Operation</u>	<u>hr/day</u>	<u>days/week</u>	<u>weeks/year</u>	<u>hrs/year</u>
Slabstock Process	6	7	52	2184
Rebond Process	24	7	52	8760
Foam Fabrication				
Operations	24	7	52	8760
Tank Storage	24	7	52	8760
Steam Boiler	24	7	52	8760
Environmental Heating				400

The permittee shall maintain a log to show compliance with this condition. The log shall be kept for a minimum of 5 years and made available for Department inspection upon request.

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Specific Condition 4.

From:

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

AVERAGE EMISSIONS FROM FACILITY OPERATIONS:

<u>Chemicals</u>	<u>lbs/hr</u>	<u>TPY</u>
methylene chloride	1,519.11	261.03
1,1,1-trichloroethane	2.5	1.86
toluene diisocyanate	0.3746	0.157

MAXIMUM POTENTIAL EMISSIONS FROM INDIVIDUAL OPERATIONS ARE ESTIMATED TO BE:

	<u>Operation/chemical</u>	<u>lbs/hr</u>	Emissions <u>TPY</u>
I.	Slabstock Polyurethane Foam Production/ toluene diisocyanate	0.37	0.14
II.	Foam Line Stack/methylene chloride	955.8	153.93
III.	Long Bun Storage Room Stack/ methylene chloride	557.55	89.79
IV.	Foam Fabric Operations/ methylene chloride	5.1	14.41
	1,1,1 trichloroethane	2.5	1.86
V.	Rebond Polyurethane Foam Production/ toluene diisocyanate	0.0046	0.017
VI	Tank Storage (Tank No. 10)/ methylene chloride	0.66	2.92
VII.	Steam Boiler	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)	
VIII	Environmental Heating	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)	

To:

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

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**AVERAGE EMISSIONS FROM FACILITY OPERATIONS:**

<u>Chemicals</u>	<u>lbs/hr</u>	<u>TPY</u>
methylene chloride	2,222	261.0
1,1,1-trichloroethane	2.5	1.86
toluene diisocyanate	0.375	0.42

**MAXIMUM POTENTIAL EMISSIONS FROM INDIVIDUAL OPERATIONS ARE ESTIMATED TO BE:**

	<u>Operation/chemical</u>	<u>lbs/hr</u>	<u>Emissions</u> <u>TPY</u>
I.	Slabstock Polyurethane Foam Production/ toluene diisocyanate	0.37	0.40
II.	Foam Line Stack/methylene chloride	1,400	153.9
III.	Long Bun Storage Room Stack/ methylene chloride	816.7	89.8
IV.	Foam Fabric Operations/ methylene chloride	5.1	14.4
	1,1,1 trichloroethane	2.5	1.86
V.	Rebond Polyurethane Foam Production/ toluene diisocyanate	0.0046	0.017
VI	Tank Storage (Tank No. 10)/ methylene chloride	0.66	2.92
VII.	Steam Boiler	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)	
VIII	Environmental Heating	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)	

A copy of this letter shall be attached to the referenced air construction permit and shall become a part of that permit.

Sincerely



Howard L. Rhodes, Director  
Division of Air Resources Management

HLR/ch  
Enclosure

cc: L. Kozlov, CD  
D. Nester, Orange County  
K. Rykowski, HLA

Florida Department of  
**Environmental Protection**

**Memorandum**

TO: Howard L. Rhodes  
THROUGH: Clair Fancy *CAF*  
A. A. Linero *AA*  
FROM: Cleve Holladay *CH*  
DATE: January 10, 1996  
SUBJECT: Modification of Permit, Foamex, L.P.

*Cleve*  
**RECEIVED**  
JAN 12 1996  
BUREAU OF  
AIR REGULATION

Attached for your approval and signature is a letter that will modify the permit for Foamex's polyurethane manufacturing facility in Orange County. The modification will allow Foamex to increase their maximum operating times for the Slabstock Process, Rebond Process and Foam Fabrication Operations at the facility. This increase in operating hours will result in a slight increase of 0.26 tons per year in toluene diisocyanate emissions. The modification will also allow Foamex to increase the amount isopropyl alcohol for use as a cleanup solvent, which will result in a less than one ton per year increase in VOC emissions. No other increase in facility-wide allowable emissions are requested as a result of this modification. The maximum predicted ground level concentrations of all key toxic pollutants at this facility are below their respective Florida Ambient Reference Concentrations.

No comments were submitted in response to the public notice for the proposed modification.

I recommend your approval and signature.

CHF/ch/t

Attachment

Z 127 633 147



### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sender's Name <i>Douglas Terrill</i>	
Street <i>Jarman</i>	
City, State and ZIP Code <i>Orlando, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>1-16-96</i> <i>AC48-214902</i>	

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> • 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
	3. Article Addressed to: <i>Douglas Terrill, Plant Mgr          Jarman, LP          1351 Gemini Blvd          Orlando, FL 32821</i>
5. Signature (Addressee)	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature (Agent) <i>M Barber 1/18/96</i>	7. Date of Delivery <i>1-18-96</i>
PS Form 3811, December 1991    U.S. GPO: 1995-352714	8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

DOMESTIC RETURN RECEIPT