



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 13, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

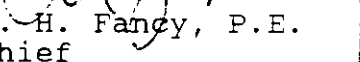
Dear Mr. Terrill:

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

Enclosed is one copy of the proposed permit modification, Intent to Issue, and Public Notice of Intent to Issue Permit Modification (for you to publish) for your polyurethane foam manufacturing facility located in Orange County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero, P.E., at the above address. If you have any questions, please call Cleve Holladay at (904) 488-1344.

Sincerely,


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

CHF/ch/t

Enclosure

cc: C. Collins, CD
D. Nester, Orange County
K. Rykowski, HLA

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit Modification

DEP File Nos. AC48-214902
Orange County

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

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue a construction permit modification (copy attached) for the proposed project as detailed in the application/request specified above and for the reasons stated below.

The applicant, Foamex, L.P., applied on July 24, 1995, to the Department of Environmental Protection for a modification to their air construction permit for their polyurethane foam manufacturing facility located in Orlando, Orange County, Florida. The modification will increase the hours of operation and allow the use of more cleaning solvent. Emissions of VOC will increase by approximately one ton.

The modification is not subject to the Prevention of Significant Deterioration (PSD) Review and does not require a Best Available Control Technology (BACT) determination.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed change.

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 Notice of Intent to Issue Permit Amendment. 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 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, Tallahassee, Florida 32399-2400, within 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 amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. 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;

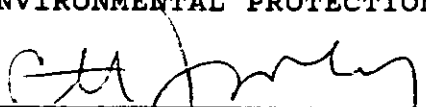
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

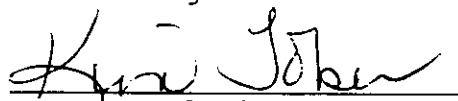
**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**


C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE PERMIT MODIFICATION** all copies were mailed by certified mail before the close of business on 10-16-95 to the listed persons.

Clerk Stamp
FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


Clerk
10-16-95
Date

Copies furnished to:

C. Collins, CD
D. Nester, Orange County
K. Rykowski, HLA

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

AC48-214902

The Department of Environmental Protection gives notice of its intent to issue a modification for construction permit No. AC48-214902 to Foamex, L.P., for their polyurethane foam manufacturing facility located in Orlando, Orange County, Florida. The modification will increase the allowable operating hours and result in an increase of volatile organic compounds (VOC) of approximately one ton per year.

The modification is not subject to the Prevention of Significant Deterioration (PSD) regulation which would otherwise require a Best Available Control Technology (BACT) determination. The modification will not cause or contribute to a violation of any state or federal ambient air quality standards.

A 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, 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; (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 28-5.207, Florida Administrative Code.

The application/request 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

Department of Environmental Protection
Central District
3319 Maguire Boulevard
Orlando, Florida 32308-3767

Orange County Environmental Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

Any person may send written comments on the proposed action to Administrator, New Source Review Section, at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



Department of Environmental Protection

DRAFT

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November xx, 1995

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.

DRAFT

Mr. Douglas L. Terrill
November xx, 1995
Page Two

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.

DRAFT

Mr. Douglas L. Terrill
November xx, 1995
Page Three

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>	<u>Emissions</u> <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:

DRAFT

Mr. Douglas L. Terrill
November xx, 1995
Page Four

AVERAGE EMISSIONS FROM FACILITY OPERATIONS:

<u>Chemicals</u>	<u>lbs/hr</u>	<u>TPY</u>
methylene chloride	2,222.43	261.03
1,1,1-trichloroethane	2.5	1.86
toluene diisocyanate	0.3746	0.424

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	0.404
II.	Foam Line Stack/methylene chloride	1,400	153.93
III.	Long Bun Storage Room Stack/ methylene chloride	816.67	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)	

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: C. Collins, CD
D. Nester, Orange County
K. Rykowski, HLA

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy
THROUGH: Al Linero *ca Linero 10/12*
FROM: Cleve Holladay *C. Holladay 10/12*
DATE: October 12, 1995
SUBJ: Modification of Permit No. AC 48-214902
Foamex, L.P.

Attached is an Intent to Issue, a Public Notice, and a letter modifying a construction permit (draft) for a polyurethane manufacturing facility. 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 of 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.

AAL/ch/t

attachments

Z 127 632 544



Receipt for Certified Mail

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

9501 Name and No. Douglas Terrell Garnex, LP	
City, State and 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, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Pmt. Mod. AC 48-214902	10-16-95

PS Form 3800, March 1993

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Douglas Terrell, P. Mgr
Garnex, LP
1351 Gemini Blvd
Orlando, FL 32821/37

4a. Article Number
Z 127 632 544

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

7. Date of Delivery
10-23-95

5. Signature (Addressee)
M Barber

6. Signature (Agent)

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

PS Form 3811, December 1991

★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.