

OFFICE MEMORANDUM

To: Willard Hanks
FDEP - Tallahassee

From: Kay Rykowski

Date: January 26, 1995

Subject: Foamex, L.P.
Draft Permit to Construct

Project Number: 26005.F21.816

Post-it [™] Fax Note	7671	Date	1/26/95	# of pages	2
To	WILLARD HANKS	From	KAY RYKOWSKI		
Co./Dept.	BUR. AIR REGULATION	Co.	HLA/CTA		
Phone #	(904) 488-1344	Phone #	(407) 851-1484		
Fax #	(904) 922-6979	Fax #	(407) 855-0369		

This memo is to present to you in writing the items we discussed during previous phone conversations regarding draft permit number AC48-214902 for Foamex, L.P.

1. The value stated in Specific Condition 3 as the maximum operating time for the Slabstock Process is given as 7188 hrs/yr, but should be 7488 hrs/yr. (See attached).
2. Specific Condition 1 should be revised to state that the enhanced exhaust systems shall be completed 12 months after the permit issue date.
3. Specific Condition 6 should be revised to reflect the following dates:

First Progress Report	Due by June 30, 1995
Second Progress Report	Due by January 31, 1996
Third Progress Report	Due by June 30 1996



Harding Lawson Associates
Engineering and Environmental Services
4763 South Conway Road
Orlando, FL 32812 -- (407) 851-1484

PERMITTEE:
Foamex, L.P.

Permit Number: AC48-214902
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

3. Maximum operation times for each operation at this facility are:

Operation	hrs/day	days/week	weeks/year	hrs/year
Slabstock Process	3	5	52	780
Rebond Process	24	6	52	7188
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.

4. 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 SIX OPERATIONS:

	lbs/hr	TPY
methylene chloride	1519.11	261.03
1,1,1-trichloroethane	2.5	1.86
toluene diisocyanate	0.3746	0.157

Harding Lawson Associates

RECEIVED

JAN 03 1995



Bureau of
Air Regulation

December 27, 1994

26005.F21.816

Mr. C.H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Proof of Publication
Foamex L.P.
Notice of Intent to Issue
Permit No. AC48-214902

Dear Mr. Fancy:

Please find enclosed the Proof of Publication of the subject Notice of Intent for Foamex, L.P. Should you have any questions or comments regarding this information, please do not hesitate to contact Ms. Kay Rykowski or Mr. Joe Tessitore at (407) 851-1484.

Yours very truly,

HARDING LAWSON ASSOCIATES

Patricia Kay Rykowski

Patricia Kay Rykowski
Project Engineer

Joseph L. Tessitore
Joseph L. Tessitore, P.E.
Managing Principal

PKR/pkr
foamex13.doc/

cc: Mr. Arthur Pereira, Foamex L.P.
Mr. Doug Terrill, Foamex L.P.

M. Hopkins
C. Collins, C. Best

The Orlando Sentinel

Published Daily
\$208.00

State of Florida } S.S.
COUNTY OF ORANGE }

Before the undersigned authority personally appeared ELAINE PARKER, 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 STATE OF FLORIDA in the matter of AC48-214902 in the ORANGE Court, was published in said newspaper in the issue; of 12/20/94

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 said ORANGE County, Florida, 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.

Elaine Parker

The foregoing instrument was acknowledged before me this 21 day of DECEMBER, 19 94, by ELAINE PARKER, who is personally known to me and who did take an oath.

Maria Rosado



MARIA ROSADO
My Comm Exp. 7/13/98
Bonded By Service Ins
No. CC392006

Personally Known Other I.D.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
NOTICE OF INTENT TO
ISSUE PERMIT
AC48-214902

The Department of Environmental Protection gives notice of its intent to issue an after-the-fact construction permit to permit the existing facility to modify the exhaust/dispersion system for Foamex, L.P.'s flexible polyurethane foam manufacturing plant located at 1351 Garmini Blvd., Orlando, Orange County, FL 32821. The plan will emit approximately 1,519 lbs/hr (261 TPY) methylene chloride, 2.5 lbs/hr (1.9 TPY) 1,1,1-trichloroethane, 0.37 lbs/hr (0.16 TPY) toluene diisocyanate, and trace amounts of criteria pollutants from the combustion of natural gas in the boiler and comfort heaters. No criteria pollutant is emitted at a rate that would subject the plant to the Prevention of Significant Deterioration (PSD) regulations and require a Best Available Control Technology determination. The ambient air impact of the emissions from the facility will not exceed the Acceptable Ambient Concentrations.

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 2500 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 con-

tends 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 have the right to petition to become a party to the proceedings. The petition

must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice of the Office of General Counsel at the above address 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 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 Environment
Protection
Bureau Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Department of Environmental
Protection
Central District
3319 Maguire Boulevard,
Suite 232
Orlando, Florida 32803-3767
Orange County Environmental
Protection Department
2002 East Michigan Avenue
Orlando, Florida 32806

Any person may send written comments on the proposed action to Mr. John Brown at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.