

To: Willard Hanks - FDEP Air Section
Fax Number: 904-922-6979
From: Kay Rykowski/John Wolber
Date: September 30, 1994
Subject: Foamex, L.P., Orlando - Response to Proposed Permit Conditions
Project Number: 26005.F21.816

Number of pages (including this cover sheet): 11

Remarks:

Please find attached a copy of HLA/CTA's letter addressing Foamex's and HLA/CTA's comments and requested changes to the Proposed Permit Conditions for Foamex's Orlando facility.

The Attachments to the letter will be sent along with a hard copy of the letter via FedEx.

Please let us know if you have any questions or comments.

26005F01.DOC

cc: C. Fancv - FDEP, A. Pereira - Foamex, Bl. D. Terrili - Foamex Orlando

Transmitted by: JMW

If you do not receive all pages, please call (407) 851-1484.

Harding Lawson Associates



September 30, 1994

26005.F21.816

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

**Response to Proposed
Permit Conditions
Foamex L.P.
DEP File No. AC48-214902**

Dear Mr. Fancy:

We are in receipt of the Technical Evaluation and Preliminary Determination and the proposed Construction Permit conditions issued by your office on August 22, 1994 for the Foamex L.P. (Foamex) flexible polyurethane foam manufacturing facility located in Orlando. This letter presents a summary of the comments by Foamex and Harding Lawson Associates/Cross Tessitore & Associates (HLA/CTA) and requested changes to the proposed Specific Conditions #2, 3 and 4 issued by FDEP. The comments presented in this letter have been discussed previously by phone with Mr. Willard Hanks of your staff. Mr. Hanks requested that the comments be submitted in writing.

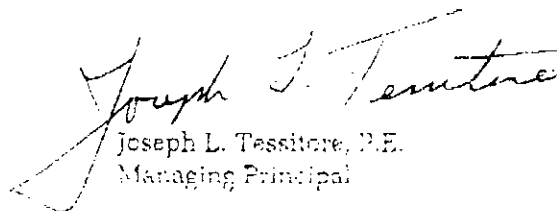
Attachments 2 and 3 provide pages from the permit application Volume 1 and Volume 2, respectively, that have been revised to reflect the changes requested in each comment. As discussed in the following comments and as stated in these attachments, the requested changes in Specific Conditions 2, 3 and 4 do not result in any substantial increase in the calculated maximum ground level concentrations for methylene chloride, toluene diisocyanate, or 1,1,1-trichloroethane. The maximum ground level concentrations remain below the FDEP Acceptable Ambient Air Concentrations (AAAC) for these compounds.

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) 651-1484.

Yours very truly,

HARDING LAWSON ASSOCIATES

Patricia Kay Rykowski
Project Engineer


Joseph L. Tessitore, P.E.
Managing Principal

PKR/pkr

foamex12.doc

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

50-00000-111

11/11/94 10:00 AM 11/11/94 10:00 AM 11/11/94 10:00 AM 11/11/94 10:00 AM

September 26, 1994
 26005.F21.816
 Mr. C.H. Fancy, P.E.
 FDEP
 Page 2

COMMENT 1

Foamex requests a change in the limits on the annual quantities of chemicals used at the facility stated in Specific Condition 2. Increases in the annual usage rates of polymer, polyol and toluene diisocyanate are requested to allow for production of high density foam grades that do not require the use of a blowing agent. Polymer and polyol do not contain Volatile Organic Compounds (VOC) or Hazardous Air Pollutants (HAP), and the usage rates of these materials do not affect any emission calculations included in the application. Attachment 1 provides Material Safety Data Sheets (MSDS) for these chemicals.

Since toluene diisocyanate (TDI) is also required for the production of such high density foam grades, an increase in the annual TDI usage rate is also requested. Both emission rates and air quality impact levels of TDI were calculated in the permit application, thus HLA/CTA revised the analyses to account for the requested increase in the annual TDI usage rate. A summary of the revised analyses are provided below.

	As Stated in Permit Application	Revised As Per Requested Change to Specific Condition 2
Annual TDI Usage Rate	2325 TPY	5000 TPY
Maximum TDI Emission Rate	0.129 TPY 0.3746 lb/hr	0.31 TPY 0.3746 lb/hr
Maximum TDI Ground Level Concentration	0.15 $\mu\text{g}/\text{m}^3$ (8 hr) 0.02 $\mu\text{g}/\text{m}^3$ (24 hr)	0.15 $\mu\text{g}/\text{m}^3$ (8 hr) 0.02 $\mu\text{g}/\text{m}^3$ (24 hr)
FDEP AAAC - TDI		0.36 $\mu\text{g}/\text{m}^3$ (8 hr) 0.0864 $\mu\text{g}/\text{m}^3$ (24 hr)

As a result of the requested change in annual TDI usage, the total annual TDI emissions increased from 0.129 tpy to 0.31 tpy. However, the maximum 8-hr and 24-hr TDI groundlevel concentrations did not change as a result of this emissions increase and thus remain well below the FDEP Acceptable Ambient Air Concentrations (AAAC).

An increase in the annual usage rate of mineral spirits to 1000 lbs/hr is also requested. Mineral spirits is included as one of the cleanup solvents used at the facility and this usage rate does not impact any emission calculations included in the application.

September 26, 1994
28005.F21.816
Mr. C.H. Fancy, P.E.
FDEP
Page 3

The requested change in Specific Condition 2 is provided below.

From:

- 2. 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; 270,000 lbs/yr (135 TPY) polymer; 8,300,000 lbs/yr (4,400 TPY) polyol; and, 4,650,000 lbs/yr (2,325 TPY) 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, 97.5 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:

- 2. 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 (5,000 TPY) 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, 1000 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.

Handwritten annotations include three '+' signs with arrows pointing to the following values in the 'To:' section: 1,000,000 lbs/yr (500 TPY) polymer, 10,000,000 lbs/yr (5,000 TPY) toluene diisocyanate, and 1000 lbs/yr mineral spirits. There is also a handwritten 'sk' near the 1000 lbs/yr value.

September 26, 1994
 26005.F21.816
 Mr. C.H. Fancy, P.E.
 FDEP
 Page 4

COMMENT 2

Foamex requests a change in the maximum operating times stated in Specific Condition 3 for the Slabstock Process, Rebond Process and Foam Fabrication operations at the facility. The weekly Slabstock Process operation is requested to be increased from 4 days/wk to 5 days/wk, the daily Foam Fabrication operation is requested to be increased from 12 hrs/day to 16 hrs/day, and the daily Rebond process operation is requested to be increased from 12 hrs/day to 24 hrs/day. These changes are requested to provide for greater flexibility in production scheduling, and to allow for production of the high density foam grades as discussed under Comment 1 above. The requested increases in operating times for each operation result in an increase in the annual emission rate of TDI; this emission increase was considered along with the increase in annual TDI usage discussed under Comment 1 above. The requested increases in the operating time for the Foam Fabrication and Rebond process operations result in an increase in the maximum 24-hr average emission rates for the facility exhaust fans (Source Numbers 3 through 21) used in the dispersion modeling analysis for calculation of maximum 24-hr ground level concentrations of methylene chloride, TDI and 1,1,1-Trichloroethane. HLA/CFA revised this analysis to account for the increased emission rates, and the results are summarized below.

	As Stated in Permit Application	Revised As Per Requested Change to Specific Condition 3	
Methylene Chloride 24 hr Maximum Emission Rate Exhaust Fans 3-19	0.64949 lb/hr	0.67078 lb/hr	↑ +
TDI 24 hr Maximum Emission Rate Rebond Exhaust Fans 20-21	0.00115 lb/hr	0.0023 lb/hr	↑ +
1,1,1-Trichloroethane 24 hr Maximum Emission Rate Exhaust Fans 3-19	0.02380 lb/hr	0.098 lb/hr	↑ +
Maximum 24 hr Ground Level Concentrations:			
Methylene Chloride	84.6 $\mu\text{g}/\text{m}^3$	85.3 $\mu\text{g}/\text{m}^3$	↑ +
TDI	0.02 $\mu\text{g}/\text{m}^3$	0.02 $\mu\text{g}/\text{m}^3$	
1,1,1-Trichloroethane	2.3 $\mu\text{g}/\text{m}^3$	3.1 $\mu\text{g}/\text{m}^3$	
FDEP AAAC - Methylene Chloride		417.6 $\mu\text{g}/\text{m}^3$ (24 hr)	↘
FDEP AAAC - TDI		0.0864 $\mu\text{g}/\text{m}^3$ (24 hr)	
FDEP AAAC - 1,1,1-Trichloroethane		8168 $\mu\text{g}/\text{m}^3$ (24 hr)	

These results show that the maximum 24 hr ground level concentrations for each compound remain well below the FDEP AAAC.

September 26, 1994
 26005.F21.816
 Mr. C.H. Fancy, P.E.
 FDEP
 Page 5

3²

The requested change in Specific Condition 2 is provided below.

From:

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

Operation	hrs/day	days/week	weeks/year	hrs/year
Slabstock Process	3	4	52	624
Rebond Process	12	6	52	3744
Foam Fabrication Operations	12	6	52	3744
Tank Storage	24	7	52	8760
Steam Boiler	24	7	52	8760
Environmental				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:

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	7488 ↑↑↑
Foam Fabrication Operations	16	6	52	4992 ↑↑
Tank Storage	24	7	52	8760
Steam Boiler	24	7	52	8760
Environmental				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.

September 26, 1994
 26005.F21.816
 Mr. C.H. Fancy, P.E.
 FDEP
 Page 6

COMMENT 3

As a result of the issues addressed in Comments 1 and 2, Foamex requests a modification of the estimated emissions stated in Specific Condition 4. The requested changes in Specific Condition 4 are provided below.

From:

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	0.129

MAXIMUM POTENTIAL EMISSIONS FROM INDIVIDUAL OPERATIONS ARE ESTIMATED TO BE:

Operation/chemical	Emissions	
	lbs/hr	TPY
I. Slabstock Polyurethane Foam Production		
a) toluene diisocyanate	0.37	0.12
b) Foam Line Stack		
methylene chloride	955.8	153.88
c) Long Bun Storage Room Stack		
methylene chloride	877.55	89.75
II. Foam Fabric Operations		
methylene chloride	5.1	14.41
1,1,1-trichloroethane	2.5	1.86
III. Rebond Polyurethane Foam Production		
toluene diisocyanate	0.0046	0.106
IV. Tank Storage (Tank No. 10)		
methylene chloride	0.05	1.83
V. Steam Boiler	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)	
VI. Environmental Heating	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)	

September 26, 1994
 26005.F21.816
 Mr. C.H. Fancy, P.E.
 FDEP
 Page 7

To:

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	NC
1,1,1-trichloroethane	2.5	1.86	NC
toluene diisocyanate	0.3746 NC	0.157	↑

MAXIMUM POTENTIAL EMISSIONS FROM INDIVIDUAL OPERATIONS ARE ESTIMATED TO BE:

Operation/chemical	Emissions		
	lbs/hr	TPY	
I. Slabstock Polyurethane Foam Production			
a) toluene diisocyanate	0.37 NC	0.14	↑+
b) Foam Line Stack methylene chloride	955.8	153.93	NC
c) Long Bun Storage Room Stack			
methylene chloride	577.55	89.79	NC
II. Foam Fabric Operations			
methylene chloride	5.1	3.47	NC
1,1,1-trichloroethane	2.5	1.86	NC
III. Rebond Polyurethane Foam Production			
toluene diisocyanate	0.0046 NC	0.017	↑+
IV. Tank Storage (Tank No. 10)			
methylene chloride	0.66	2.92	NC
V. Steam Boiler	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)		
VI. Environmental Heating	Trace amounts of the normal products of combustion (less than 1 lb/hr of all pollutants)		

SEP-30-93
THU

Petty-file

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. AC48-214902

Applicant's Name: Foamex, LP

With regard to the above referenced application, the applicant hereby with full knowledge and understanding of applicant's rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed by law. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 18 day of September 1994.

The undersigned is authorized to make this waiver on behalf of the applicant.

Douglas Terrill

Signature

Douglas Terrill

Name (Please Type or Print)

Harding Lawson Associates



RECEIVED

SEP 20 1994

Bureau of
Air Regulation

September 14, 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

**Request for Extension to
Submit Written Comments on
Proposed Permit Conditions
Foamex L.P.
DEP File No. AC48-214902**

Dear Mr. Fancy:

We are in receipt of the Technical Evaluation and Preliminary Determination and the proposed Construction Permit conditions issued by your office on August 22, 1994 for the Foamex L.P. flexible polyurethane foam manufacturing facility located in Orlando. These documents were recieved at our office on August 31, 1994.

Oral comments on the proposed Construction Permit conditions have been discussed with Mr. Willard Hanks of FDEP by telephone, however Mr. Hanks has requested that these comments be submitted in writing. This letter is to request an extension of the 14 day period allowed for submitting written comments on the proposed permit conditions. Written comments will be submitted to your office on or before September 30, 1994. As discussed with Mr. Hanks, the Notice of Intent to Issue Permit will not be published until we receive confirmation that the Notice will not be revised to reflect our comments.

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
Project Engineer

PKR/pkr
foamex11.doc/

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

Joseph L. Tessitore, P.E.
Managing Principal

Memorandum

Florida Department of
Environmental Protection

TO: John Brown
FROM: Willard Hanks *wh*
DATE: August 19, 1994
SUBJECT: Foamex, L.P.
History Briefing

The following is a brief history of what has led to the attached proposed permit for the referenced facility.

In the early 1990's, it was reported in a paper that there was a major air toxic source operating in Orlando without an air permit. The Central District asked me if the Department has any records on Foamex. I was unable to find any file on Foamex in the records kept in Tallahassee. The Orange County Environmental Protection Department obtained a Consent Order that required Foamex to submit an application to the Department on September 15, 1992.

The first application, dated May 28, 1992, described the existing facility. On June 1, 1992, the Department requested an application fee for this facility. On June 26, 1992, the Department requested additional information on the original application.

In response to the June 26, 1992, letter, the application was revised and resubmitted on December 4, 1992. The applicant discussed control options but proposed none. The Department requested additional information in a letter dated December 22, 1992.

On April 7, 1993, and December 14, 1993, additional information was submitted by Foamex.

On June 9, 1993, we met with the applicant to discuss their proposal. Our concern was that they were not committing to a specific control option. During this meeting, the Department requested additional information.

On January 27, 1994, another meeting was held with the Company. At that meeting, it was agreed that the company would resubmit an application proposing to raise stack heights so that the Acceptable Ambient Concentrations are not exceeded. Controls would not be required at this time because EPA is scheduled to propose MACT for methylene chloride in a couple years.

Willard,
Good Summary.

Alan

Memorandum
August 19, 1994
Page Two

A June 30, 1994, application was resubmitted as agreed to in the meeting. The application was received on July 1, 1994. On August 1, 1994, a reporting schedule for the future control of emissions from the industry was submitted by Foamex.

The attached Preliminary Determination and proposed permit is based on the last application (June 30, 1994) submitted by Foamex.

WH/bjb

RECEIVED

Harding Lawson Associates

AUG 8 1994



Bureau of
Air Regulation

August 3, 1994

26005.F21.816

Mr. Willard Hanks
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400


Foamex, L.P.
Application For Permit To Construct
Flexible Polyurethane Foam Manufacturing Facility
Application Number AC48-214902

Dear Willard:

Please find attached a proposed schedule for the compliance activities associated with the Application For Permit To Construct the Foamex, L.P. Flexible Polyurethane Foam Manufacturing Facility in Orlando, Florida. This application was revised and submitted to you on June 30 to address the issues discussed during the meeting conducted on January 27, 1994 in Tallahassee. The attached schedule was developed to follow the time periods agreed upon during the meeting for submittal of progress reports and completion of construction. Should you have any questions or comments regarding this schedule, please do not hesitate to contact me.

Yours very truly,

HARDING LAWSON ASSOCIATES

 *For PKR*

Patricia Kay Rykowski
Project Engineer

PKR/pkr
foamex8.doc/
Enclosure

cc: Mr. Charles Collins, P.E., FDEP - Central District ✓
Mr. Dennis Nester, Orange County EPD ✓
Mr. Arthur Pereira, Foamex, L.P.
Mr. Doug Terrill, Foamex, L.P.

Willard Hanks - 8/8/94 RR

August 3, 1994
26005.F21.816
Mr. Willard Hanks
FDEP
Page 2

PROPOSED COMPLIANCE SCHEDULE

**Foamex, L.P.
Flexible Polyurethane Foam Manufacturing Facility
Orlando, Florida**

FDEP Construction Permit Issued Permit will require installation of enhanced capture and dispersion system.	September 1994
First Progress Report Submittal to FDEP Progress Reports will provide status of industry developments in alternate process and control technologies for reducing emissions of blowing agents, and status of MACT standard development.	January 1995
Certificate of Completion of Construction Submittal to FDEP Certification will satisfy Construction Permit requirements for enhanced capture and dispersion system.	June 1995
Second Progress Report Submittal to FDEP	June 1995
Title V Operating Permit Application submittal to FDEP As required to comply with the requirements of FDEP 17-213 for Foamex, L.P. source category.	November 1995
Third Progress Report Submittal to FDEP Progress Report submittals will continue biannually until MACT standards for industry group are issued by EPA/FDEP.	January 1996

FACSIMILE TRANSMISSION

To: Willard Hanks, FDEP
Number: (904) 922-8979
From: Kay Rykowski
Date: 8/1/94
Subject: Foamex, L.P.
Project Number: 26005.F21.818

Number of pages (including this cover sheet): 3

Remarks:

Willard:

Should you have any questions regarding this schedule, please contact Joe Tessitore if Willard is out of the office until Monday, August 8.

Kay Rykowski

I made copy of this for myself to have with

cc: _____
Transmitted by: _____ **Time:** _____

If you do not receive all pages, please call Sheryl or Cassie at (407) 251-1484



Harding Lawson Associates - Cross Tessitore & Associates
Engineering and Environmental Services
4783 South Conway Road

Harding Lawson Associates



July 21, 1994

26005.F21.816

Mr. Willard Hanks
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Foamex, L.P.
Application For Permit To Construct
Flexible Polyurethane Foam Manufacturing Facility
Application Number AC48-214902

Dear Willard:

Please find attached a proposed schedule for the compliance activities associated with the Application For Permit To Construct the Foamex, L.P. Flexible Polyurethane Foam Manufacturing Facility in Orlando, Florida. This application was revised and submitted to you on June 30 to address the issues discussed during the meeting conducted on January 27, 1994 in Tallahassee. The attached schedule was developed to follow the time periods agreed upon during the meeting for submittal of progress reports and completion of construction. Should you have any questions or comments regarding this schedule, please do not hesitate to contact me.

Yours very truly,

HARDING LAWSON ASSOCIATES

Patricia Kay Rykowski

Patricia Kay Rykowski
Project Engineer

PKR/pkr
foamex8.doc/
Enclosure

cc: Mr. Charles Collins, P.E., FDEP - Central District
Mr. Dennis Nester, Orange County EPD
Mr. Arthur Pereira, Foamex, L.P.
Mr. Doug Terrill, Foamex, L.P.

July 21, 1994
26005.F21.816
Mr. Willard Hanks
FDEP
Page 2

PROPOSED COMPLIANCE SCHEDULE

**Foamex, L.P.
Flexible Polyurethane Foam Manufacturing Facility
Orlando, Florida**

FDEP Construction Permit Issued **September 1994**
Permit will require installation
of enhanced capture and dispersion system.

First Progress Report Submittal to FDEP **January 1995**
Progress Reports will provide status of
industry developments in alternate process
and control technologies for reducing emissions
of blowing agents, and status of MACT standard
development.

Certificate of Completion of Construction Submittal to FDEP **June 1995**
Certification will satisfy Construction Permit requirements
for enhanced capture and dispersion system.

Second Progress Report Submittal to FDEP **June 1995**

Title V Operating Permit Application submittal to FDEP **November 1995**
As required to comply with the requirements of
FDEP 17-213 for Foamex, L.P. source category.

Third Progress Report Submittal to FDEP **January 1996**
Progress Report submittals will continue biannually
until MACT standards for industry group are issued by EPA/FDEP.

CROSS/TESSITORE & ASSOCIATES, P.A.
Consulting Environmental Engineers

4763 South Conway Road, Suite F.
Orlando, Florida 32812

Telephone: 407-851-1484
Fax: 407-855-0369

CITA PROJECT NUMBER: F21.816

URGENT FACSIMILE DOCUMENT

ATTN: WILLARD HANKS FAX#: 904-922-6979

COM. Y: FDER BUREAU OF AIR REGULATION

FROM: JOSEPH TESSITORE FAX#: 407-855-0369

SUBJECT: FOAMEX, L.P.

DATE: 07-06-93

NO. OF PAGES (INCLUDING THIS SHEET): 2 HARD COPY TO FOLLOW X
YES NO



CROSS/TESSITORE & ASSOCIATES, P.A.

4753 SOUTH CONWAY ROAD
ORLANDO, FLORIDA 32812
407/851-1484

July 6, 1993

Mr. Willard Hanks
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Foamex, L.P.
(C/TA # F21.816)

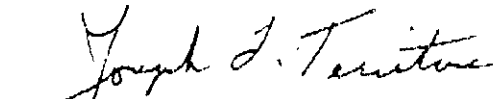
Dear Mr. Hanks:

I would like to thank you for providing me with the opportunity to meet with you on Wednesday, June 9 along with Mr. Art Pereira, Mr. Charles Eavenson and Mr. Joseph Lunderville of Foamex, L.P.

Through our discussion during this meeting, it was clear that the Bureau of Air Regulation (BAR) feels that additional information should be submitted in support of the construction permit application currently under review for the Foamex Facility in Orlando. C/TA and Foamex have already begun to compile and develop the information requested, however, the completion of a document for submittal will require several more weeks. Considering the additional time required for BAR review of the submittal document, an extension of the permit review schedule seems necessary. As the current schedule require FDER to act on the application by July 12, C/TA requests an extension of 90 days to provide sufficient time for submittal and review of the information requested by FDER.

Please do not hesitate to contact me should you have any questions or comments concerning this matter.

Sincerely,


Joseph L. Tessitore, P.E.
Vice President

ILT/kp

cc: Mr. Dennis Nester, OCEPD
Mr. Charles Collins, P.E., FDER - Central Florida District
Mr. Charles Eavenson, Foamex, L.P.
Mr. Art Pereira, Foamex, L.P.

C5993.Dcc

REGISTERED PROFESSIONAL ENGINEERS

Federal ID # 59-1633534