

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY

APR 13 1999

OPERATING PERMIT
(REVISED 03/30/1999)

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.S. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

Permit No.	<u>OP-23-0006A</u>	Source(s)	<u>Facility NOx and VOC RACT</u>
Owner	<u>Foamex International, Inc.</u>	Air	<u></u>
Address	<u>1500 East Second Street</u>	Cleaning	<u></u>
	<u>Eddystone, PA 19022</u>	Device	<u></u>
Attention	<u>Mr. Anthony Conte</u>	Location	<u>Eddystone Borough</u>
	<u>Environmental Technician</u>		<u>Delaware County</u>


This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of all applicable plan approvals issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

(SEE ADDITIONAL CONDITIONS ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued 09/30/1996
Expires 09/30/2001


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (SMC99)57A

OPERATING PERMIT CONDITIONS
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FOAMEX INTERNATIONAL, INC.
(REVISED 03/30/1999)

CONDITIONS (continued):

3. This Operating Permit includes Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the CAAA, and 25 Pa. Code Sections 129.91 through 129.95 for the following sources: 1: Maxfoam machine; 2: CTM/log machines; 3) foam curing area; 4) flame laminator; 5) bun zapper; 6) felt presses; 7) vinyl coater process; 8) Roll Zapper; 9) Superior boiler No. 1; 10) Superior boiler No. 2; 11) Superior boiler No. 3; 12) vinyl coater baking oven; 13) make-up air heater Nos. 1, 2 and 3; 14) fire system hot water heater; 15) boiler room emergency generators; 16) F substation emergency generator and 17) diesel fire pump generator. This permit also consolidates existing permit Nos. 23-318-038 and 23-318-024. The terms and conditions of permit Nos. 23-318-038 and 23-318-024 are incorporated into this permit.
4. ~~Total Volatile Organic Compound emissions from this facility shall not exceed 476 tons/year on a 12 month rolling average basis. Total Nitrogen Oxide emissions from this facility shall not exceed 32 tons/year on a 12 month rolling average basis.~~
5. The company shall record the operating hours of the sources by job as described in condition No. 3 to verify compliance with condition No. 4.
6. NOx and VOC RACT for all the sources mentioned in condition No. 3 shall be the operation and maintenance of the sources in accordance with manufacturers specifications and good air pollution control practices.
7. The operating hours for source Nos. 15, 16, and 17 shall be limited to 500 hours each in a consecutive 12-month period.
8. ~~The company shall maintain records in accordance with recordkeeping requirements of 25 Pa. Code Section 129.95. Foamex International, Inc shall maintain "hard" copies of the operating records and ink application records for a period of two (2) years and shall make these records available to the Department upon request. Recordkeeping must provide sufficient data to verify compliance with condition No. 4.~~
9. ~~The Eddystone facility shall not at any time result in the emission of any air contaminants in excess of the limitations specified in, or established pursuant to any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection.~~
10. The expiration date shown on this Operating Permit is for State purposes only. For Federal enforcement purposes the RACT portion of this Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the US Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by the US EPA upon its approval of the above as a revision to the SIP.

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FOAMEX INTERNATIONAL, INC.
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CONDITIONS (continued):

11. If at any time it is determined that the operation of the aforementioned source(s) is causing the emission of visible air contaminants in excess of the limitations specified in Section 123.41, or malodorous air contaminants in excess of the limitations specified in Section 123.31, or Volatile Organic Compounds in excess of the limitations specified in Section 123.31 and condition 4 above or is causing the emission of these contaminants or any other type of air contaminant in excess of the limitations specified in this permit as specified in, or established pursuant to, any other applicable rule or regulation contained in Article III, the owner shall take immediate steps, including the installation of air cleaning device(s), if necessary, to reduce the air contaminant emissions to within the applicable limitations.
12. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.
13. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
14. The following conditions apply to Felt Press (E5). The following conditions are not a determination of RACT. This Operating Permit consolidates Plan Approval No. PA-23-0006B.
 - A. The felt press (E5) shall be operated in accordance with manufacturer's and good air pollution control practices.
 - B. VOC emissions from the felt press (E5) shall not exceed 1.53 pounds per hour and 6.6 tons per year.
 - C. The operating hours of the felt press (E5) shall be recorded on a daily basis.

(SMC99)57B

