



Air Pollution Control Board

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April 14, 2008

NOTICE OF WORKSHOP

FOR DISCUSSION OF IMPLEMENTATION OF THE NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS FOR FLEXIBLE POLYURETHANE FOAM PRODUCTION AND FABRICATION AREA SOURCES

The San Diego County Air Pollution Control District (District) will hold a public workshop to discuss local implementation of new federal requirements pursuant to the Code of Federal Regulations (CFR), Title 40, Part 63, Subpart OOOOOO – *National Emission Standard for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources*. This federal regulation is designed to limit emissions of hazardous air pollutants (HAPs), specifically methylene chloride, from flexible polyurethane foam production and fabrication at area sources of HAPs. Exposure to methylene chloride can cause cancer and other health issues.

Under State law, the District is required to implement and enforce National Emission Standards for Hazardous Air Pollutants (NESHAPs). At the workshop, the District will provide an overview of the NESHAP and answer questions regarding its requirements. The District will also discuss how the regulation will be implemented in San Diego County. Comments concerning local implementation or requirements of the NESHAP may be submitted in writing before or made at the workshop, which is scheduled as follows:

DATE: Wednesday, May 28, 2008
TIME: 9:00 a.m. – 11:00 a.m.
PLACE: San Diego Air Pollution Control District
Main Conference Room
10124 Old Grove Road
San Diego, CA 92131

The Flexible Polyurethane Foam Manufacturing and Fabrication Area Sources NESHAP was promulgated by the Environmental Protection Agency (EPA) on July 16, 2007, and requires generally available control technology or management practices (GACT) for affected facilities. Section 112 of the Federal Clean Air Act (CAA) required EPA to identify at least 30 HAPs whose emissions from area sources pose the greatest threat to public health in urban areas. Flexible polyurethane foam production and fabrication was listed under CAA Section 112, pursuant to its contribution of methylene chloride emissions in urban areas.

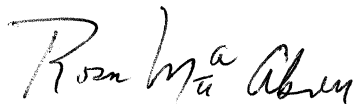
The NESHAP affects all owners or operators of plants that produce flexible polyurethane foam or rebound foam, or operators of flexible polyurethane foam fabrication facilities that are area sources of HAPs. An area source of HAPs is any facility that emits less than 10 tons per year of any single HAP or less than 25 tons per year of combined HAPs. Specifically, it applies to all equipment and activities necessary to produce slabstock flexible polyurethane foam, molded flexible polyurethane foam, rebound foam production, and flexible polyurethane foam fabrication.

For molded flexible polyurethane foam production, rebound foam production, and flexible polyurethane foam fabrication facilities, the NESHAP eliminates the use of methylene chloride as an equipment cleaner, in a mold release agent, or in any adhesive used. Compliance with this requirement may be demonstrated with material usage records, Material Safety Data Sheets, and engineering calculations. These facilities were required to eliminate methylene chloride use in the above mentioned processes on the date the NESHAP was promulgated by EPA, July 16, 2007.

Slabstock polyurethane foam production facilities may comply with the NESHAP by either eliminating the use of methylene chloride from the slabstock polyurethane foam production process, or limiting the use of methylene chloride as specified in the calculation provided in Section 63.11416(b)(1). Slabstock polyurethane foam production must be in compliance with the NESHAP requirements by July 16, 2008.

All facilities complying with the NESHAP by eliminating the use of methylene chloride must have a compliance certification on file with the District, and maintain records verifying compliance. Records must be maintained for at least five (5) years, including the most recent two (2) years maintained onsite.

The District requests that workshop participants bring their own copy of the NESHAP, which may be downloaded from the District website <http://www.sdapcd.org>, under Rules and Regulations, Public Workshop Schedule, or you may call Janet McCue at (858) 586-2712. If you have any questions concerning District implementation or requirements of the amended NESHAP, please contact Cara Bandera at (858) 586-2751 or Rob Reider at (858) 586-2640.



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Air Pollution Control District

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