



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Future Foam, Inc.

FROM: Jason Schenandoah, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Future Foam, Inc.

Facility Location: 1900 Lusher Ave, Elkhart, IN 46517

Date of Inspection: August 30, 2022

EPA Inspector(s):

1. Jason Schenandoah, Environmental Engineer
2. Danny Nguyen, Environmental Engineer

Other Attendees:

1. Tonya Ruben, HR/EHS Manager, Future Foam
2. Dennis Ruben, Plant Manager, Future Foam
3. Mike Noble, Chemist, Future Foam
4. Randy Woody, Material Unloader, Future Foam
5. Tomas Johanson, EHS Manager, Corporate

Contact Email Address: Bbowen@futurefoam.com; Tjohanson@futurefoam.com;
Truben@futurefoam.com

Purpose of Inspection: To ensure compliance with Section 112(r) of the Clean Air Act

Facility Type: Polyurethane foam product manufacturer

Regulations Central to Inspection: 40 C.F.R. Part 68: Chemical Accident Prevention Provisions (CAPP)

Arrival Time: 8:30 am

Departure Time: 10:45 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided. Reason:
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Future Foam, Inc. (Future Foam Personnel unless otherwise noted.

Company Ownership: On March 2, 2022, Future Foam purchased the 1900 Lusher Ave, Elkhart, Indiana facility (the Facility) from Innocor Foam Technologies.

Process Description:

Toluene diisocyanate (TDI) and polyol arrives at the Facility via tanker truck and are unloaded via separate loading zones into fixed roof storage tanks stored indoors. TDI and polyol is sent through process piping to the mixing zone. TDI and polyol is then combined to form a foam and is immediately placed on a trough with a conveyor. As the conveyor moves a continuous slab of foam is formed in the trough. Slabs are cut to size as the foam is formed and stored to cure. Foam slabs may be cut to shape according to customer needs. Foam products are then shipped via truck from the Facility.

The storage of TDI at the Facility was the focus of the inspection. TDI is stored in nine storage tanks at the Facility and those storage tanks and associated piping are subject to the CAPP. There are four 12,000-gallon tanks and five 6,000-gallon tanks.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The storage tanks are contained in two rooms that have containment walls around them. The four larger tanks are in their own room and the five smaller tanks share a room with all other storage

tanks operated by at the Facility. The containment walls have a section cut out of them that creates an opening between the room with the larger tanks and the room with all of the remaining tanks. The floor is continuous between the two rooms through the opening between the rooms.

The worst-case release scenario used a puddle area for the size of the room with the larger tanks only.

Staff Interview:

The total area of the rooms containing all storage tanks is 4605 sq. ft. Future Foam staff stated that their emergency response plan (ERP) was provided to the local emergency planning committee (LEPC) and the local fire department. The Facility has no accident history.

Photos and/or Videos: were taken during the inspection.

One photo was taken and is logged in Appendix A: Digital Image Log. Future Foam has claimed the photo as confidential.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Risk Management Plan (RMP) submittal
2. Aloha calculation for worst-case release scenario

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Email from the LEPC and local fire department regarding receipt of the ERP.

Compliance Assistance:

Future Foam personnel was informed that the worse-case release scenario should include a puddle area that includes the total area of the floor within the containment walls minus the area of each storage tank base.

Concerns: The worse-case release scenario was previously underestimated due to the puddle size used in the Aloha calculation. When the puddle size is corrected, it may include a distance to end point that will have a public receptor within its radius.

DIGITAL SIGNATURES

Report Author: **JASON
SCHENANDOAH** Digitally signed by JASON
SCHENANDOAH
Date: 2022.10.04
10:54:34 -05'00'

Section Supervisor: **NATHAN
FRANK** Digitally signed by
NATHAN FRANK
Date: 2022.10.07
11:22:31 -05'00'

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APPENDICES AND ATTACHMENTS

- 1.* Appendix A: Digital Image Log

Facility Name: Future Foam, Inc.

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Jason Schenandoah	2. Archival Record Location: Electronic Records Center
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0194.jpg	8/30/2022 9:40 am*		Opening in containment walls between the room with the large TDI storage tanks and the room containing all other storage tanks.

*The time on the camera was still programed to central time. The photo was taken in the eastern time zone and the time has been corrected in the log above to account for it.