



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105**

October 22, 2008

Brian Yeh  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA 97165-4182

Re: Proposed Title V Minor Permit Revision for Insulfoam, LLC, Facility ID Number 151843

Dear Mr. Yeh:

Thank you for the opportunity to review the proposed title V permit revision for the Insulfoam facility, located at 5635 Schaefer Ave in Chino, CA. In accordance with South Coast AQMD regulations and 40 CFR § 70.8(c), EPA has 45 days from receipt of a proposed permit and all necessary supporting documentation to object in writing to its issuance. The Agency's review period for this permit is scheduled to end on October 24, 2008.

Based on our review of the proposed permit, we have the following comments:

- 1) Pursuant to SIP Rule 1175 and consent decree number 07-CV-01092-SGL-OP (issued July 20, 2008), condition P42.1 of the permit limits the operator to 2.4 lb of VOC per 100 lbs of raw material processed. The condition further states that to determine emissions from the manufacturing operation, it shall be assumed all blowing agent is released from the product and a mass balance equation shall be used. EPA has the following comments with respect to this condition:
  - a. Neither the permit nor the underlying applicable requirement specifies the procedures for measuring the residual content of the blowing agent in the product or the frequency at which the Permittee must make those measurements and perform the mass balance calculation to determine compliance with the limit. Where an applicable requirement does not require periodic testing or monitoring, 40 CFR 70.6(a)(3)(B) and District Rule 3004(a)(4)(C) require that the title V permit contain periodic monitoring sufficient to assure compliance. Therefore, the District should revise the permit to include such details. The permit should also specify what records are necessary to document the use of raw material.
  - b. In addition to stating that the defendant shall comply with the VOC limit, the consent decree further specifies that the facility is out of compliance if the residual pentane content of the product is or exceeds 2.4 lbs per 100 lbs of raw material. It also says that if the residual pentane is less than 2.4 lbs per 100 lbs of raw material then all uncontrolled emissions shall be added to the residual pentane

to determine compliance with the limit. These details should be included in the permit.

2) Condition D29.2 in part states the following:

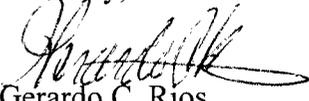
D29.2 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
VOC	Method(s) specified in District Rule 1175	District-approved averaging time	Protocol to indicate test locations for collection efficiency demonstration
VOC	Method(s) specified in District Rule 1175	District-approved averaging time	Inlet and outlet simultaneously of oxidizer

The District should revise the permit to state the averaging time that is required for the source tests.

If you would like to discuss our comments, please contact Joseph Lapka of my staff (415-947-4226, [lapka.joseph@epa.gov](mailto:lapka.joseph@epa.gov)).

Sincerely,

  
Gerardo C. Rios  
Chief, Air Permits Office