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8 Attorney for Petitioner  
9 IPS Corporation

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12 **BEFORE THE HEARING BOARD OF THE**  
13 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

14 **In the Matter of**

15 IPS Corporation (Facility ID No. 800367),  
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Case No. 6269-1

**STIPULATION TO PLACE PETITION  
FOR SHORT VARIANCE ON  
CONSENT CALENDAR**

Hearing Date: March 25, 2025  
Time: Consent Calendar  
Place: South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

We, the undersigned parties, hereby agree and stipulate as follows:

1. This matter may be placed on the Hearing Board's Consent Calendar for Wednesday, March 25, 2025, pursuant to District Hearing Board Rule 4(a)(4).
2. The Petitioner seeks a short variance for its Regenerative Thermal Oxidizer (Permit No. G10605) and equipment connected to it, namely, fill lines, mixers, and holding tanks (jointly "Equipment"). Petitioner seeks the variance from District Rules 203(b) and 3002(c)(1) as they pertain to conditions in Petitioner's Title V Permit (Facility ID No. 800367) ("Permit"): (i) Condition No. 6, Administrative Condition E.3 (first sentence only), and Administrative Condition E.7 (first sentence only) for its Regenerative Thermal Oxidizer (Permit No. G10605); (ii) Condition

1 No. 3 for Fill Lines Nos. 3, 21, 22, and 23 (Permit Nos. M42127, G6402, G6404, G10603) and for  
2 Mixers MM-1 through MM-12 (Permit Nos. G6381, G12140, G12139, G12138, G6384, G6385,  
3 G12137, G6387, G6388, G6390, G6391, G6392); (iii) Condition No. 4 for Holding Tanks Nos. H-1  
4 through H-5 (Permit Nos. G12141, F97834, F98735, F98736, F98737); and (iv) Administrative  
5 Condition E.3 (first sentence only), Administrative Condition E.4, and Administrative Condition E.7  
6 (first sentence only) for all the Equipment. The Petitioner does not anticipate visible emissions during  
7 the short variance and is not seeking relief from District Rule 401.

8 3. Operation under the proposed Order is not expected to result in a violation of Health and  
9 Safety Code Section 41700 (nuisance).

10 4. The Declaration of Pratap N. Padalkar (filed concurrently with this Stipulation) may be  
11 submitted to the Hearing Board in support of IPS Corporation's Petition for Short Variance.

12 5. The parties have agreed on a (Proposed) Findings and Decision and (Proposed) Order  
13 (filed concurrently with this Stipulation).

14 6. The parties hereby request that the Hearing Board decide the matter based on this  
15 Stipulation, Declaration and other documents submitted by the parties.

16 7. The parties further agree that Petitioner's Exhibits A through D shall be re-numbered to  
17 Exhibits 1 through 4, as listed below:

18	Petitioner's Exhibit 1	Permit Excerpts
19	Petitioner's Exhibit 2	Manufacturer Guarantee
20	Petitioner's Exhibit 3	Notice of Violation
21	Petitioner's Exhibit 4	U.S. EPA Performance Test Calculation Guidelines

22 8. The parties stipulate to the variance conditions attached to the Declaration of Mr.  
23 Padalkar and marked therein as:

24	Petitioner's Exhibit 5	Variance Conditions
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25 9. Based on all the evidence in this case, the District does not oppose the granting of the  
26 variance on the Consent Calendar for March 25, 2025.

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28 SO STIPULATED

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Dated: March 18, 2025

**DUANE MORRISS LLP**

By: *Viviana Heger*

Viviana Heger

*Attorney for Petitioner*

*IPS CORPORATION*

Dated: March 18, 2025

By: *Sheri Hanizavareh*

Sheri Hanizavareh

*Senior Deputy District Counsel*  
Principal