

Proposed Modified Conditions
Order for Abatement Case No. 6239-1
Hearing Date: May 28, 2024
Flexfirm Holdings, LLC - Facility ID: 187620

No modifications are sought for Conditions 1 through 5 of the Order. Below are proposed modifications or additional conditions.

6. Respondent shall schedule VOC source testing to demonstrate compliance of the afterburner for Rule 1128, to be completed no later than June 28, 2024.
7. Respondent shall repair any leaks and ducting of their afterburner prior to conducting the VOC source test.
8. Respondent shall submit the source testing results to the South Coast AQMD Source Testing Division no later than 72 hours after receipt, with a copy to astewart@aqmd.gov, amartinez2@aqmd.gov, jlee4@aqmd.gov, and shanizavareh@aqmd.gov. Respondent shall request and pay for expedited processing.
9. In lieu of complying with Condition Nos. 6, 7 and 8, Respondent shall submit permit application(s) to the South Coast AQMD to construct a new or modified control equipment and the equipment which it vents to in order to comply with Rule 1128 by July 31, 2024. Respondent shall request and pay for expedited processing.
10. Respondent shall test the VOC content of all applied coatings to paper, fabric, or film substrate used at the facility no later than July 31, 2024 pursuant to the test methods set forth in Rule 1128(f)(1).
11. Respondent shall submit the VOC content results, specifying which oven line each coating was processed in, to the South Coast AQMD (astewart@aqmd.gov, amartinez2@aqmd.gov, jlee4@aqmd.gov, and shanizavareh@aqmd.gov) no later than 72 hours after receipt of results.
12. Respondent shall not use or apply any plastisol to any paper, fabric or film substrate unless the coating contains less than 20 grams of VOC per liter of coating, less water, and less exempt compounds, as applied.
13. Respondent shall limit the throughput of coatings and solvents used in the equipment permitted under P/O G52678 to no more than 68 gallons in any one day. The Respondent shall also limit the daily throughput of Neoprene coating to no more than 23 gallons in any one day. Respondent shall maintain daily records and provide these to amartinez2@aqmd.gov for each month no later than the 3rd day of the following month, starting June 3, 2024.
14. To demonstrate compliance with Rule 1147, Respondent shall comply with the following:

- a. Submit a source test protocol to the South Coast AQMD for NO_x and CO testing to demonstrate compliance of the afterburner with Table 2 limits in Rule 1147, no later than July 1, 2024. Respondent shall request and pay for expedited processing.
 - b. Conduct source test of the afterburner no later than 30 days after receiving approval of the source test protocol.
 - c. Submit the source testing results to the South Coast AQMD Source Testing Division no later than 72 hours after receipt, with a copy to astewart@aqmd.gov, amartinez2@aqmd.gov, jlee4@aqmd.gov, and shanizavareh@aqmd.gov. Respondent shall request and pay for expedited processing.
15. If the source test results do not demonstrate compliance with Rule 1147 (20 ppmv NO_x and 1000 ppmv CO limits) for the afterburner, Respondent shall reduce operation of the afterburner to no more than 81 hours/month or limit the natural gas throughput to less than 230,550 scf/month. Respondent shall also submit applicable permit application(s) to demonstrate or incorporate conditions for compliance with Rule 1147 within 14 days after the source test report has been approved or accepted.
16. Respondent shall maintain gas usage records including totalizing gas meter readings or time meter readings, to comply with the Rule 1147 one pound per day exemption for both curing ovens and the afterburner (if non-compliant with Rule 1147 emissions limits) and provide these to amartinez2@aqmd.gov each month, no later than the 3rd day of the following month, starting June 3, 2024.
17. Within fourteen days of this Order, Respondent shall submit one change of condition or modification permit application to modify Permit No. G75719 to accurately represent the equipment located at its facility, the equipment configuration, and the applicable rules and emission limitations. Respondent shall request and pay for expedited processing.
18. Within fourteen days of this Order, Respondent shall submit one change of condition permit application to modify Permit No. G52678 to accurately represent the equipment located at its facility, the equipment configuration, and the applicable rules and emission limitations. Respondent shall request and pay for expedited processing.
19. Within fourteen days of this Order, Respondent shall submit one administrative change application to Permit No. G52678, to split the afterburner on a separate permit. Respondent shall request and pay for expedited processing.
20. If the Respondent installs and operates a new control device to comply with Rules 1128 or 1147, it shall complete construction of the equipment within 6 months after permit issuance.
21. Parties shall appear before the Hearing Board for a status/modification hearing in September 2024.

22. The Hearing Board may modify this Order for Abatement without the stipulation of the parties upon a showing of good cause therefore, and upon making the findings required by Health and Safety Code Section 42451(a) and District Rule 806(a). Any modification of the Order shall be made only at a public hearing held upon 10 days published notice and appropriate written notice to Respondent.
23. Unless terminated earlier, the Hearing Board shall retain jurisdiction over this matter until December 13, 2024, at which time this Order for Abatement, if it has not been properly extended, shall expire.
24. This Order for Abatement does not act as a variance, and Respondent is subject to all rules and regulation of the District, and with all applicable provisions of California law. Nothing herein shall be deemed or construed to limit the authority of the District to issue Notices of Violation, or to seek civil penalties, criminal penalties, or injunctive relief, or to seek further orders for abatement, or other administrative or legal relief.