

1 OFFICE OF THE GENERAL COUNSEL
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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6 Attorneys for Petitioner
South Coast Air Quality Management District
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8
9 BEFORE THE HEARING BOARD OF THE
10 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

11 **In the Matter of**

12
13 SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

14
15 Petitioner,

16 vs.

17 FLEXFIRM HOLDINGS LLC,

18 [Facility ID No. 187620]

19 Respondent.

CASE NO. 6239-1

**PETITION TO MODIFY AND
EXTEND ORDER FOR ABATEMENT**

Health and Safety Code § 41700 and
District Rules 203, 402, 1128, and 1147

Hearing Date: May 28, 2024

Time: 9:30 a.m.

Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

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21
22 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (hereinafter referred to as
23 “District” or “Petitioner”) petitions the South Coast AQMD Hearing Board to issue a Modified Order
24 for Abatement directed to Respondent FLEXFIRM HOLDINGS LLC (“Flexfirm” or “Respondent”)
25 relating to its facility located at 2300 North Chico Avenue, South El Monte, CA 91733 (“Facility”).
26 The Order for Abatement (“Order”) was approved by the Hearing Board on July 25, 2023, pursuant
27 to notice and in accordance with the provisions of California Health and Safety Code (“H&S Code”)
28 § 40823 and District Rule 812. The Order is set to expire May 31, 2024.

1 1. Respondent owns and operates a Coating/Curing Oven with Afterburner under Permit
2 to Operate G52678 (“VOC Oven” and “Afterburner”) and a Coating/Curing Oven under Permit to
3 Operate G75719 (“Non-VOC Oven”) [collectively “Equipment”].

4 2. Since the July 25, 2023 hearing, Respondent has complied with some but not all of
5 the conditions set forth under the Order. A courtesy copy of the Minute Order and Finding and
6 Decision is attached.

7 **Rule 1128**

8 3. District Rule 1128 applies to all persons applying coatings or wash primer to paper,
9 fabric, or film substrates, and includes requirements regulating emissions of VOCs.

10 4. Pursuant to Condition 1 of the Order, Respondent has submitted a source test protocol
11 of the Afterburner (Permit to Operate G52678) to demonstrate compliance with Rule 1128 pursuant
12 to the Order.

13 5. Pursuant to Condition 2 of the Order, Respondent scheduled a source test of the
14 Afterburner to be conducted on October 16, 2023. However, due to complications at the Facility, the
15 test could not be conducted as scheduled on that day.

16 6. On or around November 10, 2023, Respondent completed a source test of the
17 Afterburner. The results of the source test demonstrated a VOC destruction efficiency of 74.5%,
18 which did not meet the Rule 1128 requirement of a VOC destruction efficiency of at least 95%.

19 7. Pursuant to Condition 3 of the Order, Respondent submitted the Afterburner source
20 test results within 72 hours to the District.

21 8. Pursuant to Condition 4 of the Order, due to the failed source test, Respondent
22 submitted a plan to the District to bring the VOC Oven and Afterburner into compliance with Rule
23 1128, including a plan to conduct another source test. The compliance plan was submitted 31 days
24 after receipt of the source testing results, which was a day late according to Condition 4. A true and
25 correct copy of the Respondent’s compliance plan submitted to the District on or around January 11,
26 2024 is attached hereto as Ex. 3.

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1 9. The District alleges that Respondent continues to operate the Facility in violation of
2 District Rule 1128. To date, Respondent has not provided source test results or other information that
3 demonstrate the Equipment is operating in compliance with Rule 1128.

4 **Permitting**

5 10. Pursuant to Condition 5 of the Order, Respondent did not submit all necessary
6 applications to modify its permits and/or for new permits to accurately represent the Equipment
7 located at the Facility, the Equipment configuration, and the applicable rules and emissions
8 limitations by August 31, 2023.

9 11. On September 1, 2023, the District received one permit application from Respondent
10 for an administrative change. District staff has issued the Permit to Operate G75719 to update the
11 equipment description for the Non-VOC Oven as requested in the permit application. A true and
12 correct copy of Permit to Operate G75719 is attached hereto as Ex. 4.

13 12. To date, Respondent has not submitted all necessary permit applications.

14 **Rule 1147**

15 13. District Rule 1147 requires owners or operators of gaseous and/or liquid fuel
16 combustion equipment to demonstrate compliance with specified NOx emission limits. Flexfirm
17 operates Equipment that is subject to Rule 1147.

18 14. The District alleges that Respondent continues to be in violation of Rule 1147. To
19 date, Respondent has not provided source test results or other information that demonstrate the
20 Equipment is in compliance with Rule 1147.

21 **Odor Nuisance**

22 15. Since the July 25, 2023 hearing, the District has issued eight Notices of Violation
23 (“NOVs”) to Respondent.

24 16. District Rule 402 and H&S Code § 41700 prohibit the discharge from any source
25 whatsoever such quantities of air contaminants or other material which cause injury, detriment,
26 nuisance, or annoyance to any considerable number of persons or to the public, or which endanger
27 the comfort, repose, health or safety of any such persons or the public, or which cause, or have a
28 natural tendency to cause, injury or damage to business or property.

1 17. The District has received nearly six hundred odor complaints from January 2023
2 through the present, from the surrounding area near Flexfirm alleging the Facility as the source of
3 the odor.

4 18. Since the July 25, 2023 hearing, the District has issued seven odor public nuisance
5 NOVs against Flexfirm alleging a violation of District Rule 402 and H&S Code § 41700 as itemized
6 below.

7 a. The District issued NOV P78026 to Respondent on or about October 11, 2023.

8 b. The District issued NOV P78027 to Respondent on or about October 18, 2023.

9 c. The District issued NOV P75324 to Respondent on or about January 22, 2024.

10 d. The District issued NOV P80809 to Respondent on or about February 5, 2024.

11 e. The District issued NOV P79539 to Respondent on or about February 12, 2024.

12 f. The District issued NOV P78042 to Respondent on or about February 16, 2024.

13 g. The District issued NOV P73173 to Respondent on or about April 25, 2024.

14 19. The District issued NOV P78047 to Respondent on or around March 29, 2024 for
15 failing to comply with numerous conditions of the Order, for exceeding daily permitted usage limits,
16 and for failing to achieve minimum of 95% VOC destruction efficiency in violation of Rule 203,
17 H&S Code § 42401, and Rule 1128, respectively.

18 20. The District alleges that Respondent continues to be in violation of District Rule 402
19 and H&S Code § 41700.

20 21. The District, by this petition, seeks an Amended Order for Abatement to require
21 Respondent to cease violating District rules, or, in the alternative, to comply with such other relief
22 as this Hearing Board deems appropriate.

23 22. The issuance of an Amended Order for Abatement upon a fully noticed hearing would
24 not constitute a taking of property without due process of law.

25 23. This Amended Order for Abatement is not intended to be, nor does it act as a variance.

26 24. The issuance of the petitioned Amended Order for Abatement is not expected to result
27 in the closing or elimination of an otherwise lawful business, but if it does result in such closure or
28 elimination, it would not be without a corresponding benefit in reducing air contaminants.


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REQUEST FOR MODIFICATION AND EXTENSION

1. Petitioner requests the Order to be extended by six months and modified to include additional conditions. It is Petitioner’s intention to file proposed Findings and Decision a few days in advance of the hearing.

Dated: May 8, 2024

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
OFFICE OF THE DISTRICT COUNSEL
Josephine Lee, Senior Deputy District Counsel
Sheri Hanizavareh, Principal Deputy District Counsel

By: 

Josephine Lee
Sheri Hanizavareh
Attorneys for Petitioner

COPY OF
***7/25/23* MINUTE ORDER**

**BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
MINUTE ORDER**

South Coast AQMD vs Flexfirm
Holdings LLC
2300 N. Chico Avenue
South El Monte, CA 91733

Case No: 6239-1
Facility ID: 187620

Hearing Date: 07/25/2023

Hearing Type: Order for Abatement

Consent Calendar:

HEARING BOARD ACTION

Action: ISSUED

Starting Date: 07/25/2023

Ending Date: 05/31/2024

203(b)
402
1128
1147

California Health and Safety Code §41700

EQUIPMENT DESCRIPTION

DEVICE/APPLICATION/PERMIT

Oven

G52678

CONDITIONS

Respondent shall comply with the conditions as set forth in the Order for Abatement and Findings and Decision of the Hearing Board, attached.

REMINDER

In the event respondent will be unable to comply with the final compliance date, a petition requesting a modification and extension of the Order for Abatement may be filed. To meet notice requirements, the petition **must be** filed no later than **May 7, 2024**. In the event of the hearing is not needed and taken off calendar, respondent may request a refund of 50% of the filing fee, however, respondent will be responsible for the publication fee.

[Redacted] Cynthia Verdugo-Peralta, Chair
Robert Pearman, Esq., Vice Chair
Mohan Balagopalan
Dr. Marla Slaughter, Alternate

[Redacted] Mary Reichert, Senior Deputy District Counsel

[Redacted] Anthony Endres, Consultant, Furnace Dynamics

[Redacted] Adam Martinez, Air Quality Inspector I
Austin Stewart, Air Quality Engineer I

[Redacted] Albert Castillo, General Manager

[Redacted] #1 - Proposed Findings and Decision
#2 - Amended Proposed Findings and Decision

[Redacted] Respondent's Exhibit:
A - Emissions Calculations
B - AB Drawings, Burner, BACT, Rules
C - AB Operation Records
D - Overview going forward

[Redacted] Verdugo-Peralta/Slaughter 4-0

Board
Review/Approval 
Cynthia Verdugo-Peralta, Chair

Dated: 09/14/23

Prepared by: Aithere Rothchild
Attachment: Findings and Decision of the Hearing Board

**COPY OF
FINDINGS AND
DECISION**

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BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

vs.

FLEXFIRM HOLDINGS LLC,

[Facility ID No. 187620]

Respondent.

CASE NO. 6239-1

**FINDINGS AND DECISION FOR AN
ORDER FOR ABATEMENT**

Health and Safety Code § 41700 and District
Rules 203, 402, 1128, and 1147

Date: July 25, 2023

Time: 9:00 a.m.

Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

FINDINGS AND DECISION OF THE HEARING BOARD

This petition for an Order for Abatement was heard on July 25, 2023, pursuant to notice and in accordance with the provisions of California Health and Safety Code Section 40823 and District Rule 812. The following members of the Hearing Board were present: Cynthia Verdugo-Peralta, Chair; Robert Pearman, Esq., Vice-Chair; Mohan Balagopalan; and Dr. Maria Slaughter; Alternate. Petitioner, Executive Officer, was represented by Mary J. Reichert, Senior Deputy District Counsel. Respondent, Flexfirm Holdings LLC (hereinafter referred to as "Respondent" or "Flexfirm"), was

1 represented by Anthony Endres. The public was given the opportunity to testify. The matter was
2 submitted and evidence received. The Hearing Board finds and decides as follows:

3 **FINDINGS OF FACT**

4 1. Petitioner is a body corporate and politic established and existing pursuant to Health
5 and Safety Code §40000, *et seq.* and §40400, *et seq.*, and is the sole and exclusive local agency with
6 the responsibility for comprehensive air pollution control in the South Coast Basin.

7 2. Respondent Flexfirm Holdings LLC operates a Facility subject to the jurisdiction of
8 the District. Flexfirm is a textile coating facility located at 2300 N. Chico Ave, South El Monte, CA
9 91733. Its Facility ID Number is 187620.

10 3. The District has received over two hundred odor complaints from January 2023
11 through the present, from the community living near Flexfirm alleging the Facility as the source of
12 the odor. The District has traced the odors back to Flexfirm on numerous occasions. The District
13 alleges that Respondent is in violation and has been in violation of District Rule 402 since at least
14 May 22, 2023. The District has issued six Notice of Violations alleging a violation of District Rule
15 402 and Health and Safety Code section 41700 between May 22, 2023, and June 6, 2023.

16 4. Flexfirm owns and operates an Oven, Drying – Coating under Permit to Operate
17 G52678 (“Equipment”) and has not conducted a source test on this Equipment since it applied for a
18 change of operator in June 2018. The last provided record of a source test conducted for the
19 Equipment at Flexfirm was in 1996.

20 5. The afternoon of the last District business day before the Order for Abatement hearing
21 before the Hearing Board, Flexfirm asserted that the Equipment was exempt from 1147. Flexfirm
22 and District staff are currently examining the configuration and processes of the Equipment to
23 determine if it is exempt from 1147 and/or subject to any other District rules that restrict the emissions
24 of Nitrous Oxides (NOx).

25 6. The Equipment is also subject to District Rule 1128. Respondent has not conducted a
26 source test on the Equipment to demonstrate compliance with the VOC limits in Rule 1128.

1 **CONCLUSION**

2 1. The continued operation of the Equipment will result in violations of District Rules
3 203 and 1128 and may result in violations of Rule 1147 and odor nuisances in violation of District
4 Rule 402 and Health and Safety Code section 41700.

5 2. The issuance of the prayed for Stipulated Order for Abatement is not expected to
6 result in the closing or elimination of an otherwise lawful endeavor, but if it does result in such
7 closure or elimination, it would not be without a corresponding benefit in reducing air contaminants.

8 3. This Stipulated Order for Abatement is not intended to be nor does it act as a
9 variance.

10 4. The issuance of this Stipulated Order for Abatement upon a fully noticed hearing
11 will not constitute a taking of property without due process of law.

12 5. There is good cause to issue this Stipulated Order for Abatement to assure that
13 operation of the Equipment is done in a manner that will minimize and mitigate excess emissions
14 and bring the Facility into compliance as expeditiously as practicable.

15 **ORDER**

16 THEREFORE, subject to the aforesaid statements and good cause appearing, the Hearing
17 Board hereby orders Respondent to immediately cease and desist from violating District Rule 203,
18 402, 1128 and 1147, or in the alternative comply with the following conditions and increments of
19 progress:

20 1. Respondent shall submit a source test protocol to the District for VOC testing to
21 demonstrate compliance with Rule 1128 no later than July 31, 2023. Respondent shall request and
22 pay for expedited processing.

23 2. Respondent shall schedule the VOC source testing to occur as soon as possible after
24 receipt of the approved source testing protocol, but no later than October 16, 2023. Respondent shall
25 request and pay for expedited processing of the source testing results. Respondent shall provide
26 notice to the District (amartinez2@aqmd.gov and astewart@aqmd.gov) no later than 10 days prior
27 to the date of the scheduled source test.

1 3. Respondent shall submit the source testing results to the District source testing
2 division no later than 72 hours after receipt, with a copy to amartinez2@aqmd.gov,
3 astewart@aqmd.gov, and mreichert@aqmd.gov.

4 4. If the source testing results do not demonstrate compliance with Rule 1128,
5 Respondent shall, within 30 days of receipt of the source testing results, submit a plan to the District
6 to bring the equipment into compliance with Rule 1128.

7 5. Respondent shall by August 31, 2023, submit application(s) to modify its permit(s)
8 and/or for new permits to accurately represent the equipment located at its facility, the equipment
9 configuration, and the applicable rules and emissions limitations. Respondent shall request and pay
10 for expedited processing. The applications shall include the Safety Data Sheets (SDS) for all
11 coatings and solvents used at the Facility and maintenance records for all of the equipment at the
12 Facility for the previous three years.

13 6. The Hearing Board may modify this Order for Abatement without the stipulation of
14 the parties upon a showing of good cause therefore, and upon making the findings required by Health
15 and Safety Code Section 42451(a) and District Rule 806(a). Any modification of the Order shall be
16 made only at a public hearing held upon 10 days published notice and appropriate written notice to
17 Respondent.

18 7. Unless terminated earlier, the Hearing Board shall retain jurisdiction over this matter
19 until May 31, 2024, at which time this Order for Abatement, if it has not been properly extended,
20 shall expire.

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1 8. This Order for Abatement does not act as a variance, and Respondent is subject to
2 all rules and regulation of the District, and with all applicable provisions of California law. Nothing
3 herein shall be deemed or construed to limit the authority of the District to issue Notices of Violation,
4 or to seek civil penalties, criminal penalties, or injunctive relief, or to seek further orders for
5 abatement, or other administrative or legal relief.

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8 **FOR THE BOARD:**


Cynthia Verdugo-Peralta, Chair

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11 **DATED:**

09/14/23

12
13 Reviewed by Anthony Endres, Consultant for Respondent

14 Prepared by Mary J. Reichert, Attorney for Petitioner

EXHIBIT 3



FURNACE DYNAMICS

261 Euclid Ave.
Long Beach, CA 90803
562-433-3025

January 11, 2024

Ms. Mary J. Reichert
Sr. Deputy District Counsel
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE. Stipulated Order For Abatement – Case 6239-1

Dear Ms. Reichert,

Pursuant to the Order for Abatement, Case 6239-1, Flexfirm had done an evaluation of the existing conditions and sought to ameliorate the cause for concern that included odors from complaints to the SCAQMD and subsequent NOV's. Additionally, the requirement to conduct a source test to illustrate compliance with Rule 1128 required 95% destruction efficiency.

In the initial evaluation, it was discovered ducting was in need of repair, some instrumentation issues existed, and other operational considerations. To address these items, outside contractors were brought in to address and rectify the items. An initial source test was attempted and was terminated due to a duct that was leaking.

Flexfirm attempted to conduct an initial source test on October 16, 2023. During the setup in preparation for the test, some leakage was observed in the ducting. The source test was terminated.

These items were repaired. A second source test was conducted on November 10, 2023. We have included invoices that reflect the repairs accomplished subsequent to the failed source test.

Flexfirm Plan For Compliance After Source Test:

- 1) Repaired the affected paneling by an outside contractor – Invoices are included.
- 2) Scheduled another source test that was conducted on November 10, 2023. Results were submitted to the SCAQMD on December 11, 2023. The results showed that the smoke test passed, however, the destruction efficiency indicated a 74.5% destruction with a requirement of 95%.

- 3) The CO ppm was 847 passing the regulatory compliance of 2000 ppm (Rule 407) and 1000 ppm per Rule 1147.

We believe that there have not been odor complaints since the modifications made prior to the source test.

During the source test, some anomalies were discovered. These included temperature differences between the instruments used for controlling the AB burner, chart recorder, and high-limit controllers. The following addressed these issues.

Steps Taken To Address The Issues:

- 1) The five thermocouples at the end of the AB firing chamber were replaced.
- 2) It was found that there were some differences between the 5 TCs at the end of the chamber. To match the limit controllers and the temperature controllers the sensing locations were corrected to reflect a more uniform temperature indication.
- 3) The limit controller TC location was moved to attempt to match the indicated value on the temperature controller.
- 4) The chart recorder TC was ganged to the temperature controller to correlate readings.
- 5) A potentiometer was used to check the instruments indicated values. The values closely match the input data from the potentiometer.
- 6) Flexfirm is having all the instruments calibrated and will have the AB burner controller and chart recorder calibrated on a yearly basis.
- 7) There were some temperature oscillations discovered. The modulating damper motor and firing rate gas valve were recharacterized to smooth out the operation.
- 8) We have contacted the AB temperature controller representative as to methods of fine-tuning the instrument to optimize its operation. Those adjustments are being evaluated.

Once the final tuning is complete and all the operational parameters are deemed acceptable, Flexfirm will contact the SCAQMD as a precursor to conducting another official source test. In the interim, we are also evaluating some other potential viable technologies that could result in further VOC and odor reduction.

In the evaluation of the source test the inlet value was 70.44 #/hr and the outlet value was 17.99#/hr which represents a 74.5% destruction efficiency. Flexfirm's process only uses VOC materials in approximately 15% of the total products processed. Therefore, approximately 85% of the materials do not contain VOCs. Their normal production week is approximately 40 hours; therefore, VOCs are run only about 6 hours/week. Therefore, 17.99#/hr x 40 hours per week equates to 107.94 pounds net.

FURNACE DYNAMICS

261 Euclid Ave.
Long Beach, CA 90803
562-433-3025

However, if their process utilizes 100% VOCs in their operation and the same 70.44#/hr were generated and at a 95% destruction efficiency the net is 3.522#/hr, and at 40 hours per week, the pounds to atmosphere would be 140.88 pounds.

Therefore, due to their limited use of VOCs, the net is actually lower by 32.94 pounds than a process using VOCs 100% of the time and at the required 95% destruction efficiency. Something to consider in your evaluation.

This has been an ongoing effort to comply with SCAQMD requirements. Flexfirm has spent tens of thousands of dollars to achieve compliance with rules. Whereas significant progress has been achieved, work toward total compliance is ongoing. We appreciate the Districts' understanding and consideration for the work accomplished and our approach to achieving compliance. The other item of consideration is that Flexfirm has a total of 12 employees and generates a very small amount of annual NOx emissions of .203 tons per year or 406.53 pounds of NOx.

Flexfirm continues to work toward complete compliance with regulatory requirements.

Sincerely,

Anthony W. Endres

President

cc. Mr. Austin Stewart, Air Quality Engineer

ENC.

FLEXFIRM HOLDINGS LLC

2300 N. Chico Ave.
S. EL Monte, CA 91733
626-448-7627



Purchase Order

VENDOR

Alliance Technical Group
255 Grant St. SE
Suite 600
Decatur, AL 35601

SHIP TO

FLEXFIRM HOLDINGS LLC
2300 N. Chico Ave.
S. EL Monte, CA 91733 US

P.O. NO. 23113

DATE 07/27/2023

	GIP	QTY	RATE	AMOUNT
Ea for 518	Source Test & Protocol per proposal# 2023-2286-S	1	14,850.00	14,850.00
	final amount subject to change per terms and conditions of proposal			
TOTAL				\$14,850.00

Approved By

Date



C & H Metal Products
 2207 Chico Ave.
 So. El Monte, CA 91733
 626-442-4961

Invoice

Contractor's License # 1038250	Date	Invoice #
	10/18/2023	2023-5392

Bill To
Flexfirm Products, Inc. 2300 North Chico Ave. So. El Monte, Ca. 91733

Ship To
Flexfirm Products, Inc. 2300 North Chico Ave. So. El Monte, CA 91733

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
Verbal Albert	Net 30	RR	10/18/2023	C&H Delivered		

Quantity	Item Code	Description	Price Each	Amount
1	Taxable Item	Fabricate parts for repairs	1,107.00	1,107.00T
1	NON-Taxable	Installation	3,200.00	3,200.00
			10.25%	113.47

There will be a \$25.00 charge for all returned checks. 10% accrual interest will be assessed on all unpaid balances after 90 days. There is a 3% service charge on all credit card payments.	Total \$4,420.47
---	-------------------------

C & H Metal Products

JOB 2023-

5392

2207 Chico Ave.
So. El Monte, Ca. 91733

626-442-4961

P.O.#

Date: 10-6-23
C & H Rep: Roger
Contact: Albert
Due Date:

Company: Flex Firm
Phone#
Email:
Taxable/NonTax/ Resale
Terms

Contractors license #1038250

Will Call C&H TRUCK INSTALLATION

Misc. Repairs as per customer specifications
- oven entry hood
- heat exchanger ducting

Lot price \$ 4307.⁰⁰
plus applicable sales tax \$ 113.47
Total job cost is \$ 4420.47
Credit card service fee 3%
Total \$

Deposit \$
Remaining Balance \$

Please feel free to contact us if you have any questions at 626-442-4961

Price subject to change depending on detail changes.

P.O.#	Total Cost	Deposit	Balance

OPEN JOB

Received by [Signature] Date 10-18-2023

Opened By: _____



C & H Metal Products
 2207 Chico Ave.
 So. El Monte, CA 91733
 626-442-4961

Invoice

Contractor's License #
 1038250

Date	Invoice #
12/1/2023	2023-5504

Bill To
Flexfirm Products, Inc. 2300 North Chico Ave. So. El Monte, Ca. 91733

Ship To
Flexfirm Products, Inc. 2300 North Chico Ave. So. El Monte, CA 91733

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
Verbal Albert	Net 30	RR	12/1/2023	Will Call		

Quantity	Item Code	Description	Price Each	Amount
1	Taxable Item	Fabricate new instrument panel 11GA. HRS Installation	98.00	98.00T
1	NON-Taxable		1,600.00	1,600.00
			10.25%	10.05

There will be a \$25.00 charge for all returned checks. 10% accrual interest will be assessed on all unpaid balances after 90 days. There is a 3% service charge on all credit card payments.

Total \$1,708.05

LOPEZ ELECTRIC

1831 Belcroft Ave
 El Monte, CA 91733 US
 PHONE 626-579-3008
 lopezelectric@verizon.net

Invoice**BILL TO**

Flexfirm
 FLEXFIRM PRODUCTS, INC.
 2226 Chico Ave
 Ca
 S. El Monte, CA 91733

SHIP TO

Flexfirm
 FLEXFIRM PRODUCTS, INC.
 2226 Chico Ave
 Ca
 S. El Monte, CA 91733

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
9664	11/07/2023	\$3,502.90	12/07/2023	Net 30	

P.O. NUMBER

Albert

SALES REP

David L

ACTIVITY	QTY	RATE	AMOUNT
0-Labor:Labor Service call to troubleshoot and repair afterburner. Found bad probe. Replaced prob with spare probe. Heat exchanger needs sheet metal work. Albert will schedule and notify us to meet repair crew if needed. Albert asking for 3 more probes to replaced all when sheet metal work is done. 11/9 1hrs Ordering parts 11/20 3hrs meeting with welders. Going over parts and plan with them. 11/21 10.5hrs David 5.5 and Adrian 5hrs Replacing gutter and probes 12/13 6hrs David installing junction box and flex to cover probe cables. ***4hr min. ***Round trip travel time included ***see service report if provided	20.50	105.00	2,152.50
0-parts/hardware 18" K type probes with junction box	5	192.44	962.20T
Parts Gutter 4x4x48" nema3r	1	140.40	140.40T
Box:3R box 3R Junction box 10x10	1	72.80	72.80T
LTFLEX100 1" LT FLEX per foot	2	2.92	5.84T

ACTIVITY	QTY	RATE	AMOUNT
LTFLEX100CN 1" LT Flex connector 45deg	2	26.00	52.00T

To Pay by Credit Card:

Name on Card _____

Credit Card Number: _____

Expiration Date: ____/____/____

Billing Zip Code: _____

Card Card CVC _____

Signature _____



SUBTOTAL	3,385.74
TAX (9.5%)	117.16
TOTAL	3,502.90
BALANCE DUE	\$3,502.90

LOPEZ ELECTRIC
 1831 Belcroft Ave
 El Monte, CA 91733 US
 PHONE 626-579-3008
 lopezelectric@verizon.net

Invoice

BILL TO
Flexfirm FLEXFIRM PRODUCTS, INC. 2226 Chico Ave Ca S. El Monte, CA 91733

SHIP TO
Flexfirm FLEXFIRM PRODUCTS, INC. 2226 Chico Ave Ca S. El Monte, CA 91733

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
9682	11/15/2023	\$1,168.56	12/15/2023	Net 30	

ACTIVITY	QTY	RATE	AMOUNT
0-Labor:Labor Service call to troubleshoot and temporarily repair oven with single phasing issue due to burned main disconnect at gutter. Disconnect had missing handle already. Bypassed phase 2 at switch will follow up asap with parts to swap bad disconnect. Follow up to swap 100a fusible disconnect and overheated fuses. Follow up to pick up and Replace bad 100 amp disconnect 11/17/23 (3hrs x1.5) ***4hr min. ***Round trip travel time included ***see service report if provided	7.50	105.00	787.50
Disconnect:Indoor--Fused:DISC100a480v3pN1FU Disconnect 100a480v3p Indoor fused	1	285.00	285.00T
Fuses:Fuse100a600v 100a 600v time delay fuse	3	21.00	63.00T

To Pay by Credit Card:
 Name on Card _____
 Credit Card Number: _____
 Expiration Date: ____/____
 Billing Zip Code: _____
 Card Card CVC ____ _
 Signature _____

SUBTOTAL	1,135.50
TAX (9.5%)	33.06
TOTAL	1,168.56
BALANCE DUE	\$1,168.56

EXHIBIT 4

PERMIT TO OPERATE

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

**Legal Owner
or Operator:**

FLEXFIRM HOLDINGS LLC
2300 N CHICO AVE
SOUTH EL MONTE, CA 91733

ID 187620

Equipment Location: 2300 N CHICO AVE, SOUTH EL MONTE, CA 91733-1673

Equipment Description :

Plastic Coating and Curing System No. 2, consisting of:

1. Plastic Coating Station, with a Knife Coater, a 0.5 HP Roll Coater and a Roll Feed Station.
2. Oven, 6'-0" W. x 34'-0" L. x 6'-0" H., 500,000 Btu/hr Direct Gas Fired, with a 2 HP Air Circulating Blower.
3. Take-Up Station, with a 2 HP Main Drive and a Torque Motor with a 1/30 HP Cooling Fan.

Conditions :

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. This equipment must not be operated unless it is vented only to air pollution control equipment which is in full use and which has been issued an operating permit by the Executive Officer.
4. The total quantity of coatings and solvents used in this equipment must not exceed 400 gallons in any one day or 51 gallons in any one hour.
5. Coatings processed in this oven may not contain more than 1% solvents.
6. Records shall be maintained to demonstrate compliance with the Conditions on this permit. Records shall be kept in a format acceptable to the South Coast AQMD, shall be retained at the facility for a minimum of two years, and shall be made available to South Coast AQMD personnel upon request.

SAMPLE

PERMIT TO OPERATE

NOTICE

In accordance with Rule 206, this Permit to Operate or copy shall be posted on or within 8 meters of the equipment.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

BY JASON ASPELL/AS17
4/12/2024

SAMPLE

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18
3 and not a party to the within action. My business address is 21865 Copley Drive, Diamond Bar,
CA 91765.

4 On **May 8, 2024**, I served the within document(s) described as **PETITION TO MODIFY**
5 **AND EXTEND ORDER FOR ABATEMENT** on the interested parties in this action as stated
below:

6 Albert Castillo
7 Flexfirm Holdings LLC
8 2300 N. Chico Ave.
9 South El Monte, CA 91733
10 albert@flexfirmproducts.com

11 Anthony Endres
12 Furnace Dynamics
13 261 Euclid Ave.
14 Long Beach, CA 90803
15 awefdi@gmail.com

16 (BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope
17 addressed as set forth above. I placed each such envelope for collection and mailing following
18 ordinary business practices. I am readily familiar with this District’s practice for collection and
19 processing of correspondence for mailing. Under that practice, the correspondence would be
20 deposited with the United States Postal Service, with postage thereon fully prepaid at Diamond Bar,
21 California, in the ordinary course of business. I am aware that on motion of the party served, service
22 is presumed invalid if postal cancellation date or postage meter date is more than one day after date
of deposit for mailing in affidavit.

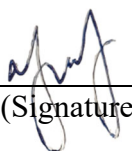
23 (BY OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained
24 by Federal Express, an express service carrier, or delivered to a courier or driver authorized by said
25 express service carrier to receive documents, a true copy of the foregoing document(s) in a sealed
26 envelope or package designated by the express service carrier, addressed as set forth above, with
27 fees for overnight delivery paid or provided for.

28 (BY E-MAIL) By transmitting a true .pdf copy of the foregoing document(s) by e-mail
transmission from to each interested party at the e-mail address(es) set forth above [on the attached
service list]. Said transmission(s) were completed on [date] at [time am/pm] as stated on declarant’s
e-mail transmission record.

Executed on **May 8, 2024**, at Diamond Bar, California.

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

Lucy Tom-Cao
(Type or print name)



(Signature)