

From: [Gary Alcock](#)
To: [OAQPS CBI](#)
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Subject: Flexfirm Holdings LLC Presidential Exemption
Date: Friday, April 18, 2025 2:46:24 PM
Attachments: [Flexfirm Military Overview.pdf](#)

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To whom it may concern,

I'm attaching an information sheet (CBI) on some of the military products manufactured by Flexfirm. This is being sent regarding our recent request for a Presidential Exemption:

Flexfirm Holdings LLC ("Flexfirm"), located in Southern California, respectfully requests a Presidential **Exemption** pursuant to Section 112(i)(4) of the Clean Air Act, specifically regarding Title V compliance requirements.

1. Emission Standards or Limitations Subject to Request:
 - Title V Permitting Requirements under the Clean Air Act.
2. Facility Information:
 - Flexfirm Holdings LLC
 - Small defense manufacturer
 - Approximately 10 employees
 - Operating continuously for 70 years
3. Length of Compliance Period Requested:
 - A two-year **exemption** period

Justification for Request:

- **Technology Availability:** Flexfirm requires upgraded equipment to achieve compliance with Title V standards. However, the required emission control equipment is financially inaccessible and unavailable under reasonable terms to a small business of our scale.
- **National Security Interests:** Flexfirm manufactures specialized components critical to U.S. military and defense systems. Our facility is one of the few remaining domestic producers of certain vital military products. Closure due to compliance inability would negatively impact the availability and security of these critical defense components, directly affecting national security interests.

We have explored all reasonable financing alternatives, including assistance from our local air district and conventional financing. Unfortunately, local vendors will not guarantee equipment performance due to regulatory uncertainty, and the local air district offers no loan programs. Without this **exemption**, Flexfirm faces imminent closure.

We respectfully request immediate consideration of this **exemption** request to maintain uninterrupted production critical to national security.

Thank you for your prompt attention and please let me know if you need anything else.

Sincerely,