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6 Attorneys for Petitioner

SpectraSite Communications, LLC

7
8 **BEFORE THE HEARING BOARD OF THE**

9 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

10 SPECTRASITE COMMUNICATIONS,
11 LLC;

12 Petitioner,

13 vs.

14 SOUTH COAST AIR QUALITY
15 MANAGEMENT DISTRICT,

16 Respondent.

CASE NO. 6261-1

17 **DECLARATION OF ANGELA
18 ROBERTSON**

Hearing: September 11, 2024

Time: 9:30 a.m.

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

19
20 I, Angela Robertson, declare:

21 1. I have been in the telecommunications industry for over 20 years. I am an authorized
22 representative of SpectraSite Communications, LLC, ("ATC"). Initially, I was supervising Network
23 Operations Center ("NOC") technicians supporting inbound calls related to Site Access, Safety,
24 Lighting and Generator Technical Support. Today, I am the Director of Network Operations, leading a
25 team of Asset Program Managers, supporting both Generators and HVAC. I have personal knowledge
26 of the facts declared, and if called as a witness, I could and would competently testify thereto.

27 2. ATC owns and operates the telecommunication facility at issue that is located at 2915 E. 12th
28 Street, Los Angeles California 90023, facility number 194439 (the "Facility").

1 3. ATC has an internal team called Network Operations Center Generators (“NOC GEN”) that
2 has several key responsibilities such as monitoring generator alarms and transfer switches and
3 troubleshooting generator issues remotely and by leveraging onsite technicians. They work closely
4 with other stakeholders to ensure that all regions are adequately supported. This includes coordinating
5 responses to alarms and ensuring that all necessary resources are available for timely resolution.

6 4. Primary power to the Facility is provided by Southern California Edison. In case of a loss of
7 power, the Facility has a generator that provides backup power (“Emergency Generator”), which
8 includes the use of an internal combustion engine operated pursuant to Permit to Operate number
9 G66246 (“Permit”). A true and correct copy of the Permit is attached hereto as **Exhibit 1**.

10 5. Condition 4 of the Permit limits the operation of the Emergency Generator to 200 hours
11 annually during each calendar year, which includes no more than 50 hours in any one year and no
12 more than 4.2 hours in any one month for maintenance and testing purposes.

13 6. As more fully described below, the use of the Emergency Generator at the Facility has
14 exceeded the 200-hour limit for this year.

15 7. In January 2024, a trespasser entered the Facility and vandalized the site fencing and
16 automatic transfer switch. The communication wires (2WS and RS485) were cut out of the automatic
17 transfer switch conduit. The Emergency Generator ran continuously for emergency usage because the
18 automatic transfer switch was not operating properly. As a result, 727 hours of emergency runtime
19 elapsed from January 8, 2024 through February 7, 2024.

20 8. On February 8, 2024, NOC Gen dispatched a generator vendor to perform routine
21 preventative maintenance on the Emergency Generator.

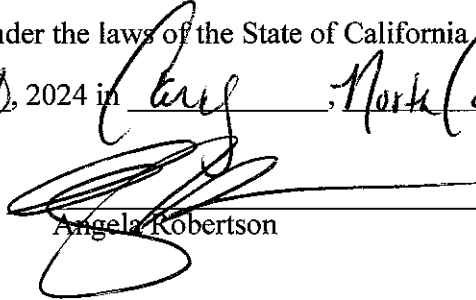
22 9. From February 8, 2024 through February 22, 2024, 333 hours of maintenance runtime
23 elapsed. The Emergency Generator was running in manual mode, so the runtime was incorrectly
24 classified as maintenance usage. The Emergency Generator was running to keep the tenant powered
25 due to the automatic transfer switch communication issue.

26 10. On March 7, 2024, due to the automatic transfer switch failure caused by the vandalism, NOC
27 Gen. deployed the generator maintenance vendor to change the batteries on the communication
28 controller and clean the cable connections. Due to personnel changes and human error, the issue was

1 not brought to the attention of ATC's HazMat department.

2 11. On March 18, 2024, when referencing a generator performance report against runtime
3 allowances, ATC's HazMat department became aware of the runtime hours exceeding the permitted
4 limit and notified NOC Gen that the Emergency Generator needed to be shut down. The Emergency
5 Generator was put in shutdown mode to await further instructions regarding variance approval.

6 I declare under penalty of perjury under the laws of the State of California that the foregoing is
7 true and correct. Executed on August 30, 2024 in Cary, North Carolina

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9 
Angela Robertson

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Exhibit 1



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

PERMIT TO OPERATE

Page 1
Permit No.
G66246
A/N 628914

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:

SPECTRASITE COMMUNICATIONS, LLC
10 PRESIDENTIAL WAY, HAZMAT COMPLIANCE
WOBURN, MA 01801

ID 194439

Equipment Location: 2915 E 12TH ST, LOS ANGELES, CA 90023

Equipment Description :

Internal Combustion Engine, Iveco S.P.A., 4 Cylinder, Turbocharged, Aftercooled, Model F4GE9485A*J, 131 BHP, Diesel-Fueled, Driving an Emergency Electrical Generator.

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. An operational non-resettable totalizing timer shall be installed and maintained to indicate the engine elapsed operating time.
4. This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year and no more than 4.2 hours in any one month for maintenance and testing purposes.
5. Operating beyond the 50 hours per year allotted for maintenance and testing purposes shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the utility distribution company has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage. Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.
6. This engine shall not be used as part of a demand response program using interruptible service contract in which a facility receives a payment or reduced rates in return for reducing its electric load on the grid when requested to so by the utility or the grid operator.
7. The operator shall keep a log of engine operations documenting the total time the engine is operated each month and specific reason for operation as:
 - A. Emergency use.
 - B. Maintenance and testing.
 - C. Other (describe the reason for operating).

ORIGINAL



PERMIT TO OPERATE

In addition, each time the engine is manually started, the log shall include the date of operation, the specific reason for operation, and the totalizing hour meter reading (in hours and tenths of hours) at the beginning and end of operation

8. On or before January 15th of each year, the operator shall record in the engine operating log the following:
 - A. The total hours of operation for the previous calendar year, and
 - B. The total hours of engine operation for maintenance and testing for the previous calendar year.

Engine operating log shall be retained on site for a minimum of three calendar years and shall be made available to the South Coast AQMD representative upon request.

9. This engine shall comply with all applicable requirements of Rules 431.2 and 1470.
10. This engine shall comply with the following emission limits:

| | |
|-------------|---------------|
| NMHC + NOx: | 3.0 g/bhp-hr |
| CO: | 3.7 g/bhp-hr |
| PM: | 0.15 g/bhp-hr |
11. Sulfur content of diesel fuel supplied to the engine shall not exceed 15 ppm by weight.

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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

A handwritten signature in black ink, appearing to read "Aspell", written over a faint horizontal line.

BY JASON ASPPELL/SB07

8/28/2021

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