

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

In the Matter of)	Case No. 6265-1
)	Facility ID 180785
MEDLINE INDUSTRIES)	
)	
Declaration of Rebecca Brown)	
)	
Section 42350 of the California)	
Health and Safety Code)	
_____)	

DECLARATION OF REBECCA BROWN

1. My name is Rebecca Brown, and I am the EH&S (Environmental Health & Safety Manager) representative for Medline Industries, LP, in Rialto, California. I am over the age of 18. I have personal knowledge of the facts stated below and could testify competently thereto if called as a witness.
2. Medline Industries, LP is the largest distributor of medical supplies in the region, and our customers rely on multiple daily deliveries of those medical supplies across area hospitals, surgery centers, immediate care centers, assisted living facilities and doctors' offices alike.

3. On 8/25/24, a contracting company, PowerFlex, was installing solar panels for the building and damaged one of the building's main switchboards making it inoperable. The building lost power. The building had to quickly respond and activate 3 of the 6 emergency generators to continue safe business operations.
4. As our business is mission critical, and because of the severe damage caused to the main service feed (Main Switchboard-B), the generators are our only means of continued operation. The building remains without power, otherwise.
5. Immediately following the incident on August 25, 2024, Medline has been working with multiple vendors and contractors to expedite the purchase and installation of the equipment necessary to repair/replace the damaged switchboard. By this variance petition, Medline Industries, LP seeks to temporarily operate our generators under the conditions of our current interim variance from Rules 203(b) and 3002(c)(1) and our permit condition no. 4, to operate (P/O) G37610, G37611, G37612, G37613, G37614, and G37615.
6. Currently, Medline Industries, LP has six air permits for all six generators onsite G37610, G37611, G37612, G37613, G37614, and G37615. In order to prepare for the installation of a new main switchboard, Medline Industries will need to continue to run 3 generators at any one time, then switch-over to the other 3 generators allowing for a comprehensive PM to be conducted. These generators will run continuously until we are able to remedy MSB-B.
7. Petitioner Will be in Violation: Medline Industries, LP is in violation of Rule 203 (b), Rule 3002 (c)(1), and AQMD Permit Condition 4, because it has operated its generators for more than 200 hours for the year.

- #4 of permit conditions state that: “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 for maintenance and testing and no more than 4.2 hours in any one month for maintenance and testing.

Medline Industries, LP will continue to be in violation of these Rules and Permit Conditions due to lead time and will be unable to replace the main switch board (MSB) by November 7, 2024.

8. Beyond Reasonable Control of Petitioner: Medline Industries, LP hired contractors to tie-in additional solar panels on August 25, 2024 to the main electrical switch board panel. During the tie-in process, and energizing the panel, there was an arch flash that completely damaged the Main Switch Board-B. Due to this incident, Medline Industries, LP immediately utilized the generators to provide power to critical equipment for customer hospital supply needs. Through an extensive investigation, the panels were completely ruined.

Immediately following this incident on August 25, 2024, Medline has been working with multiple vendors and contractors to expedite the purchase and installation of the equipment necessary to repair/replace the damaged switchboard. Following this unforeseen event, we’ve communicated with contractors who have stated the lead time will take approximately 35 weeks. We will need 4000 amp 100K SCE UGPS, Meter Section, 4000 Amp Main, and Distribution to accommodate 2000 amp load, 1000 Amp and 800 Amp loads.

Through diligent progress and costs of expediting material, Medline Industries, LP has made strides to have the equipment delivered much quicker than previously

expected. The new estimated completion date is tentative to be no later than Q1 of 2025 (March 31, 2025). We anticipate final completion December 12, 2024, yet we understand there may be a few delays in the process, including delivery, installation, replacement and testing before power is ultimately restored.

9. Medline Industries, LP, is committed to safety, and had little choice but to let the contractor go due to this incident. This delay was immediately communicated to AQMD staff on August 26, 2024. We are working with new contractors, and authorized extra hours and personnel in an effort to make up lost time.

10. We also had significant delays caused by supply chain issues beyond our control. Based on when we ordered the materials, we were given a 30 week lead-time. However, through many negotiations, cost to expedite materials, we have been awarded an early shipment and project completion date is estimated to be no later than end of Q1 2025 (March 31, 2025).

11. Based on the facts stated above, Medline Industries, LP will not be able to achieve replacement of the switchboard panels by the November 7, 2024 hearing date.

12. Closing Without Corresponding Benefit: If Medline Industries, LP is forced to shut down the generators, the facility would not be able to safely operate and would need to close or partially close. This would not only impact Medline and its employees, but also our customers and the community who rely on access to medical supplies for thousands of medical procedures, visits and care that occur in the region. Medline is a medical supplies and equipment distributor and we provide service to many hospitals, care centers, assisted living homes, etc. in the area that rely on our products to arrive daily, and in many cases, several times a day, to provide care for their patients. We are

essentially the 'storage room' for our customers, not being able to ship orders would have an immediate and devastating impact to the region.

13. Curtailement Consideration: Medline Industries, LP is unable to curtail the business, as described above, we provide critical medical supplies and shutting down or any attempt to curtail will be detrimental to our customers and community, as well as our employed staff.

14. Reduce Excess Emissions / Monitor Emissions: Emissions from operation of Generators: G37610, G37611, G37612, G37613, G37614, and G37615 (three at a time) would be about 47.98 lbs./day of CO, 165.31 lbs./day of NOx, and 2.70 lbs/day of PM. Medline Industries, LP will pay extra to expedite installation by authorizing the contractor to use additional hours and personnel to complete necessary tasks. Medline Industries, LP agrees to Conditions imposed by the District in the interim variance period. These Conditions include regular submitting hours for generators the first Tuesday of each month and providing fuel meter readings.

15. Based on the facts stated above, we respectfully request a regular variance.
Signed under penalty of perjury in Rialto, California.

Date 10/30/2024

Rebecca Brown

Rebecca Brown

Medline Industries, LP