

2024 MAY 28 PM 3: 27

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

PETITIONER: COUNTY OF LOS ANGELES – INTERNAL SERVICES DEPARTMENT CASE NO: 6127-7
FACILITY ID: 179053

FACILITY ADDRESS: Puente Hills Nike Microwave site
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: 18794 Vantage Pointe Drive, Rowland Heights, CA 91748

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM SHORT REGULAR EMERGENCY EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Shirley Wang

Ross Galang

Section Manager

Telecommunications Systems Engineer

1110 North Eastern Avenue

1110 North Eastern Avenue

Los Angeles, CA. Zip 90063

Los Angeles, CA. Zip 90063

☎ (323) 267-3011 Ext.

☎ (318) 402-6549 Ext.

Fax ()

Fax ()

E-mail swhang@isd.lacounty.gov

E-mail rgalang@isd.lacounty.gov

3. RECLAIM Permit Yes No

Title V Permit Yes No

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

This petition for variance is being filed due to violation of Permit Condition #4 (This engine shall not operate more than 200 hours in any one year, which includes no more than 50 hours in any one year for maintenance and testing).

As of April 24, 2024, total calendar year runtime is 0.8 Hours. The site generator has been running since May 13th due to a planned outage/infrastructure upgrade by Edison and ended May 21,2024 which brought the total tear-to-date runtime hours to188 hours and has not exceeded the 200 hours permitted.

5. Briefly describe the type of business and processes at your facility.

This is a County of Los Angeles Communications facility that provides critical first responders radio systems and other services. This facility should be online/on-air all the time to ensure real time continuous connectivity of communication for first responders responding to all emergencies. This site also serves as a hub that connects all other County of Los Angeles Microwave sites to the eastern part of the County.

The Communications site is equipped with fixed emergency generator on site which will provide backup power to the site when the main/commercial power fails to keep all communications radios online.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Emergency Generator	571180 / G34079		

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The emergency generator on site serves as a backup in case the utility power source (Edison power) is lost.

This is a County of Los Angeles Communications facility that provides critical first Responders radio systems and other services. This facility should be online/on-air all the time to ensure real time continuous connectivity of communication for first responders responding to all emergencies. This site also serves as a hub that connects all other County of Los Angeles Microwave sites to the eastern part of the County.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No

If yes, how often: Monthly Date of last maintenance and/or inspection May 21, 2024

Describe the maintenance and/or inspection that was performed.

Monthly service consists of, checking the oil, coolant, belts, battery, battery charger, block heater, and leaks. Repair if needed, top off fluids as needed and run the emergency generator with a load bank for up to 30 minutes. Monthly maintenance services are logged/recorded in the onsite generator logbook at the facility.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Permit to Operate - Condition #4	The generator shall not operate more than 200 hours in any one year. The emergency generator may exceed the currently limit of run hours prescribed on the permit to operate (condition#4) in the event of unforeseen Public Safety Power Shutoff (PSPS).

10. Are the equipment or activities subject to this request currently under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes No

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

As of April 24, 2024, total calendar year runtime is 0.8 Hours. The site generator has been running since May 13th due to a planned outage/infrastructure upgrade by Edison and ended May 21,2024 which brought the total tear-to-date runtime hours to188 hours and has not exceeded the 200 hours permitted.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

As of to date, the generator is still in compliance with the permit conditions. As of May 21, 2024, the current accumulated generator runtime hours is already at 188 Hours where power was lost due to Edison planned outage/power infrastructure upgrade for a week.

Possible unscheduled outages or other incidents may be expected through the rest of the year and may exceed the permitted hours for the year and Permit condition#4 will be violated.
(Permit condition#4 - The generator shall not operate more than 200 hours in any one year).

16. List date(s) and action(s) you have taken since that time to achieve compliance.

Perform monthly generator maintenance (as indicated in the permit conditions) summary dates per attachment from January 2024.

Monitor generator runtime/activities thru County of Los Angeles Network Monitoring System. This is an automatic notification by the system whenever the main power is lost, transfer power to the emergency generator and back to main power.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$ N/A

Number of employees laid off (if any): N/A

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

Possible loss of public property and life if no radio communication is available for first responders when the site is offline due to power loss since it is used by first responders for emergency communications.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

The operation of this facility cannot be terminated as this provides critical first responders radio systems for fighting the fire emergencies and protecting the public during emergencies and in areas of danger. The onsite emergency generator is the alternative/backup power source until utility power is restored.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
HC (0.11 grams/bhp-hr)	4.39	-	4.394
NOx (4.59 grams/bhp-hr)	183.36		183.360
CO (0.45 grams/bhp-hr)	17.97	-	17.976
PM (0.075 grams/bhp-hr)	2.99	-	3.996

* Column A minus Column B = Column C

Excess Opacity: N/A %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

Pollutant values converted from grams/bhp-hr to lbs/bhp-hr x 24 hours x Generator Bhp

HC = (0.11 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 755 bhp = 4.394 lbs/day
 NOx = (4.59 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 755 bhp = 183.0360 lbs/day
 CO = (0.45 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 755 bhp = 17.976 lbs/day
 PM = (0.075 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 755 bhp = 3.996 lbs/day

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

The only backup available power for these communications sites is the site generator. Other than this, there are no other available power source to use.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

The generator activity is being monitored remotely using the County of Los Angeles Network Monitoring System. This tool can provide information when the main power is shutted-off, when the power was transferred to the generator and when the power is restored back to the main power.

The system provides notification of these events and used to determine the runtime of the generator and can be used calculate the hourly emissions produced of the generator using the emissions specifications of the generator.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

The only backup available power for these communications sites is the site generator. Other than this, there are no other available power source to use.

24. State the date you are requesting the variance to begin: _____;
and the date by which you expect to achieve final compliance: December 31, 2024.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Ext. _____

Ext. _____

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Name	Company	Title
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The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on May 28, 2024, at 1110 N Eastern Ave, Los Angeles, California 90063

Signature  Print Name Ross Galang

Title: Telecommunications Systems Engineer



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.f) is not received by the expiration date, contact the District.

**Legal Owner
or Operator:**

LOS ANGELES COUNTY/ISD/PUENTE HILLS NIKE
1110 N EASTERN AVE
LOS ANGELES, CA 90063

ID 179053

Equipment Location: 18794 VANTAGE POINTE DR, ROWLAND HEIGHTS, CA 91748-5174

Equipment Description :

INTERNAL COMBUSTION ENGINE, CUMMINS, 6 CYLINDERS, TURBOCHARGED/AFTERCOOLED,
MODEL NO. QSX15-G9, 755 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. The operator shall comply with all applicable requirements of rules 431.2, 1470, 40 CFR part 60 subpart IIII, and 40 CFR part 63 subpart ZZZZ (area source)
4. This engine shall not operate more than 200 hours in any one year, which includes no more than 50 hours in any one year for maintenance and testing.
5. The operation of engine beyond 50 hours per year allotted for engine maintenance and testing 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 electrical grid operator or electric utility 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. An operational non-resettable totalizing time meter shall be installed and maintained to indicate the engine elapsed operating time.
7. On or before January 15th of each year the operator shall record in the engine operating log:
 - A. The total hours of engine operation for the previous calendar year, and
 - B. The total hours of engine operation for maintenance and testing for the previous calendar year.

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PERMIT TO OPERATE

Engine operation log(s) shall be retained on site for a minimum of five calendar years and shall be made available to the executive officer or representative upon request.

8. The operator shall keep a log of engine operations documenting the total time the engine is operated each month and the specific reason for operation as:
- A. Emergency use
 - B. Maintenance and testing
 - C. Other (be specific)

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

9. 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.

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 Dorris M. Bailey/JA08

1/13/2015

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