

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

PETITIONER: UNITED STATES NAVY _____ CASE NO: 4518-11 _____

_____ FACILITY ID: 2613 _____

FACILITY ADDRESS: Naval Weapons Station Seal Beach (NWSSB), 800 Seal Beach Blvd. _____

[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Seal Beach, CA 90740-5000 _____

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).

Michael R. Waters _____

Jeff MCGovern _____

Associate Counsel NAVFAC Southwest

Installation Environmental Program Director, NWSSB

750 Pacific Highway, Room 1622 _____

800 Seal Beach Blvd., ENV Department Code N45

San Diego, CA Zip 92132 _____

Seal Beach, CA 90740-5000

☎ (619) 705-5847 Ext. _____

☎ (562) 626- 6070 Ext. _____

Fax () _____

Fax () _____

E-mail michael.r.waters.civ@us.navy.mil

E-mail jeff.j.mcgovern.civ@us.navy.mil

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)

Not applicable. The petition is for a Short Variance.

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

Naval Weapons Station Seal Beach (NWSSB) and its Detachments in Fallbrook and Norco, provide weapons storage, loading, maintenance, and assessment support to ships of the United States Pacific Fleet. NWSSB facilities also support Coast Guard vessels and Marine Corps units stationed afloat and ashore.

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 (Please see the attached permits)	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Stationary Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G60256	Not applicable	Not applicable
Stationary Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G75853		
Stationary Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G75854		
Portable Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G72744		

*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 National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2021 requires the Secretary of Defense to conduct and comply with congressionally mandated "Black Start Exercises" (BSE), as part of Navy Energy Resilience Readiness Exercise Strategy, at military Installations. A BSE is an exercise where delivery of energy provided from the commercial electric grid (transmission system) is terminated and distribution lines are de-energized. Once the installation is disconnected from the commercial electric grid, Department of Defense (DoD) initiates the installation's electric grid, portions of it, or individual buildings, often by using emergency internal combustion engines (ICEs), to ensure operability before reconnecting to the external power supply.

The black start process is an essential legal mandate to ensure continuity of critical loads and the readiness of critical mission operations and personnel on military installations.

The BSE are conducted in three phases: 1) discussion based; 2) operations based where electricity is secured at a small set of operations within an installation requiring limited emergency engine use; and 3) full-scale exercises. The full-scale exercise phase would last no less than 12 hours within the fence line of an installation.

Department of the Navy (DON) must conduct BSE on no fewer than five installations each year through Fiscal Year 2027. Naval Weapons Station Seal Beach is anticipated to conduct a full-scale BSE in April 2025. Due to the sensitive nature of BSEs, information regarding exact dates of these events is not yet available.

The Navy is applying for this variance since the four permitted ICEs that are involved in the BSE are subject to monthly maintenance and testing (M&T) operating limits between 4.2 and 5 hours per month, depending on the engine, and 50 hours per year for each engine. Since the BSE hours would be counted against the M&T limits, they would likely exceed the permitted monthly hours, leading to potential violations. The BSE would not affect Navy's compliance with the annual M&T limit. The Navy will comply with the annual limit.

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 Please see attached

Describe the maintenance and/or inspection that was performed.

Affected engines are maintained as per manufacturer instructions.

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 G60256, Condition #4	The engine would exceed the monthly maintenance and testing limits of 4.2 hours/month when engaged in Black Start Exercises.
Permit G75853, Condition #4	The engine would exceed the monthly maintenance and testing limits of 4.2 hours/month when engaged in Black Start Exercises.
Permit G75854, Condition #4	The engine would exceed the monthly maintenance and testing limits of 4.2 hours/month when engaged in Black Start Exercises.
Permit G72744, Condition #6	The engine would exceed the monthly maintenance and testing limits of 5 hours/month when engaged in Black Start Exercises.

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
Not applicable			

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
Not applicable			

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.

BSE is a Congress-mandated requirement. NWSSB has no authority over the duration of the exercise, which is expected to take at least 12 hours. As such, the monthly M&T limit would be exceeded by 7.8 hours or more. The Navy will adjust the engines' regular maintenance schedule to ensure compliance with the annual M&T limit for each engine.

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).

NWSSB is currently in compliance with all permit conditions and rule requirements that apply to the affected engines. The purpose of this variance is to proactively seek relief from the permitted monthly M&T hours for four engines to accommodate the congress-mandated BSE at the facility.

The Navy first approached the SCAQMD on December 10, 2024, to discuss options to accommodate BSEs (Email dated 12/10/2024 from Samantha Spidell to Davian Vernon.) Mr. Vernon recommended applying for a variance from the M&T hours limit specified in the affected permits.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

The Navy is currently in compliance with all applicable limits. The BSEs at NWSSB are planned for April 2025. To the maximum extent possible, the Navy will manage the number of M&T hours per month to minimize operations and emissions.

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: \$ ___ Not applicable _____

Number of employees laid off (if any): ___ None _____

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

Economic losses are not anticipated. The BSEs are Congress-mandated activities that are intended to test a military installation's ability to operate without commercial grid power. These exercises are essential to our national security.

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

BSEs are required by law. They are outside the control of the local installation. The Navy will manage the regular M&T hours for all the engines involved in the BSE to remain below the annual M&T limit. The four engines covered by this petition have a monthly M&T limit (in addition to the annual limit). Due to the nature of BSEs, the monthly limit would likely be exceeded for these engines. The duration and extent of BSEs are outside of NWSSB's control.

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)
N/A, since the Navy will maintain compliance with the annual M&T limit, no excess emissions are anticipated as a result of the planned BSEs. The affected permits do not have a daily limit.			

* Column A minus Column B = Column C

Excess Opacity: Not applicable %

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

Not applicable.

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 Navy will minimize the operating hours to the maximum extent possible.

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.**

NWSSB will maintain records of engines' operation and make the information available to the SCAQMD upon request.

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.

Once the BSEs are completed, NWSSB will operate the engines according to all permit conditions, including limiting the monthly M&T hours to the permitted levels.

24. State the date you are requesting the variance to begin: **April 15, 2025 – Exact date to be provided when known** ; and the date by which you expect to achieve final compliance: **June 30, 2025**_____.

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: Not applicable

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.

Davian Vernon, Supervising Air Quality Inspector

Office of Compliance & Enforcement, Dvernon1@aqmd.gov Ext. (909)-396-2131

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

<u>TIMOTHY PALIK</u>	<u>USN NWSSB PWD</u>	<u>Public Works officer</u>
Name	Company	Title

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 21 FEB 2025, at Naval Weapons Station Seal Beach, California

<u></u>	<u>Lieutenant Commander Timothy Palik</u>
Signature	Print Name

Title: Public Works Officer, Naval Weapons Station Seal Beach

26. SMALL BUSINESS and TABLE III SCHEDULE A FEES: To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration Re Reduced Fee Eligibility

1. The petitioner is
 - a) an individual, or
 - b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is
 - a) a business that meets the following definition of Small Business as set forth in District Rule 102:

SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:

 - (a) the number of employees is 10 or less; AND
 - (b) the total gross annual receipts are \$500,000 or less or
 - (iii) the facility is a not-for-profit training center.

-OR-

- b) an entity with total gross annual receipts of \$500,000 or less.
3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

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

Executed on _____, at _____, California

Signature _____ Print Name _____

Title _____

ATTACHMENT A
List of Affected Equipment/Activity

Naval Weapons Station Seal Beach (NWSSB) -- Seal Beach (Facility ID # 2613)							
	Permit Number	Engine Type	Bldg. #	Engine BHP	Permitted Annual Hours (Total)	Permitted Annual M&T Hours	Permitted Monthly M&T Hours
1	G60256	Stationary	110	324	200	50	4.2
2	G75854	Stationary	353	197	200	50	4.2
3	G75853	Stationary	365	237	200	50	4.2
4	G72744	Portable	255	156.8	200	50	5



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

Page 1
 Permit No.
 G75853
 A/N 649905

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:**

U.S.GVT,NAVY,NAVAL WEAPONS STN SEAL BCH
 DBA: NAVAL WEAPONS STATION SEAL BEACH
 800 SEAL BEACH BLVD, N45W, B230
 SEAL BEACH, CA 90740-5000

ID 2613

Equipment Location: 800 SEAL BEACH BLVD, SEAL BEACH, CA 90740-5000

Equipment Description :

Internal Combustion Engine, John Deere, 6-Cylinder, Turbocharged and Aftercooled, Model 6068HF285K, Rated at 237 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 for maintenance and testing purposes and 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 do 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.



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C. Other (describe the reason for operating).

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 Executive Officer or representative upon request.

9. This engine shall comply with all applicable requirements of Rules 431.2, 1470, and 1472.

10. This engine shall comply with the following emission limits:

NMHC + NOx:	3.0 g/bhp-hr
CO:	2.6 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.





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

PERMIT TO OPERATE

Page 3
Permit No.
G75853
A/N 649905

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/CC12

4/29/2024



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PERMIT TO OPERATE

Page 1
 Permit No.
 G75854
 A/N 649906

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:**

ID 2613

U.S.GVT,NAVY,NAVAL WEAPONS STN SEAL BCH
 DBA: NAVAL WEAPONS STATION SEAL BEACH
 800 SEAL BEACH BLVD, N45W, B230
 SEAL BEACH, CA 90740-5000

Equipment Location: 800 SEAL BEACH BLVD, SEAL BEACH, CA 90740-5000

Equipment Description :

Internal Combustion Engine, Jonn Deere, 4-Cylinder, Turbocharged and Aftercooled, Model No. 4045HF285K, Rated at 197 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 for maintenance and testing purposes and 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 do 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.



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C. Other (describe the reason for operating).

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 Executive Officer or representative upon request.

9. This engine shall comply with all applicable requirements of Rules 431.2, 1470, and 1472.

10. This engine shall comply with the following emission limits:

NMHC + NO _x :	3.0 g/bhp-hr
CO:	2.6 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.





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

PERMIT TO OPERATE

Page 3
Permit No.
G75854
A/N 649906

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/CC12

4/29/2024



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PERMIT TO OPERATE

Page 1
 Permit No.
 G60256
 A/N 617969

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:**

ID 2613

U.S.GVT,NAVY,NAVAL WEAPONS STN SEAL BCH
 DBA: NAVAL WEAPONS STATION SEAL BEACH
 800 SEAL BEACH BLVD, N45W, B230
 SEAL BEACH, CA 90740-5000

Equipment Location: 800 SEAL BEACH BLVD, SEAL BEACH, CA 90740-5000

Equipment Description :

Internal Combustion Engine, Cummins, Model No. QSB7-G5 NR3, 324 BHP, 6 Cylinder, Turbocharged,
 Aftercooled, 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).



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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, 1470 and 1472.
10. This engine shall comply with the following emission limits:

NOx + NMHC:	3.00 g/bhp-hr
CO:	2.60 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.





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 AMIR DEJBAKHSH/SB07

1/30/2020



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PERMIT TO CONSTRUCT/OPERATE

Page 1
 Permit No.
 G72744
 A/N 642504

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:

ID 2613

U.S.GVT,NAVY,NAVAL WEAPONS STN SEAL BCH
 DBA: NAVAL WEAPONS STATION SEAL BEACH
 800 SEAL BEACH BLVD, N45W, B230
 SEAL BEACH, CA 90740-5000

Equipment Location: 800 SEAL BEACH BLVD, SEAL BEACH, CA 90740-5000

Equipment Description :

Portable Internal Combustion Engine, Caterpillar, Model C4.4, 4-Cylinder, 4-Cycle, 4.4 Liter, Turbocharged and Aftercooled, 156.8 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 permit to operate shall only be valid for locations within the facility for which it is issued. This engine shall not be operated within 1,000 feet of any school grounds.
5. 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 purposes.
6. This engine shall not be operated for more than 5 hours in any one month for maintenance and testing purposes.
7. 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.
8. 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 do so by the utility or the grid operator.

The operator shall keep a log documenting engine operations. The log shall contain the following information:



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- A. The date and the specific reason for operation each time the engine is started. Reasons for operation include:
 - i. Emergency use.
 - ii. Maintenance and testing.
 - iii. Other (specify the reason for operating).
- B. The totalizing hour meter reading (in hours and tenths of hours) at the beginning and end of operation for each event.
- C. The total hours the engine is operated for each calendar month.
- D. The total hours the engine is operated in the previous calendar year.
- E. The total hours the engine is operated for maintenance and testing for the previous calendar year.
- F. The date and location each time the engine is dispatched to another location.

The annual total hours of operation for the previous calendar year shall be recorded sometime during the first 15 days of January of each year. The log shall be kept for a minimum of three calendar years and shall be made available to the Executive Officer or representative upon request.

- 10. The operator shall only supply low-sulfur diesel fuel, for which the sulfur content does not exceed 15ppm by weight, to the engine. The owner or operator shall document the use of low-sulfur diesel fuel through the retention of fuel purchase records. Records shall be kept for a minimum of three calendar years and shall be made available to the Executive Officer or representative upon request.
- 11. This equipment shall comply with all applicable requirements of Rule 431.2 and 1470.
- 12. This engine shall comply with the following emission limits:

NO _x + NMHC:	3.0 g/bhp-hr
CO:	3.7 g/bhp-hr
PM10:	0.15 g/bhp-hr
- 13. This equipment shall be operated in compliance with all applicable requirements of 40 CFR Part 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.
- 14. This permit shall expire if construction of this equipment is not completed within one year from the date of issuance unless an extension is granted by the Executive Officer.





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

PERMIT TO CONSTRUCT/OPERATE

Page 3
Permit No.
G72744
A/N 642504

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/PN01

6/16/2023



FILE COPY
South Coast Air Quality Management District
Certified Copy

James Chavez

From: Massie Hatch [REDACTED]
Sent: Friday, February 21, 2025 2:58 PM
To: Clerk of Board
Cc: Mcgovern, Jeff J CIV USN NAVFAC SW SAN CA (USA); Cernac, Joy M CIV USN NAVFAC SW SAN CA (USA); Rudy Urzua; Waters, Michael R CIV USN NAVFAC SW SAN CA (USA); Silverstein, David E CIV USN (USA); Palmer, Jessica N CIV USN (USA); Sam Spidell; Bosalet, Lisa E CIV USN NAVFAC SW SAN CA (USA); Jorge Rodriguez
Subject: [EXTERNAL] Facility ID: 2613, Naval Weapons Station Seal Beach - Petition for a Short Variance for Department of the Navy Black Start Exercises
Attachments: petition-variance_NWSSB_Black Start Exercises_Final_21FEB2025(Signed)_opt.pdf

Good afternoon,

Thank you for speaking with me this afternoon.

As discussed, we are submitting the attached petition for a Short Variance on behalf of Naval Weapons Station Seal Beach, Facility ID 2613, to accommodate the upcoming congressionally mandated Black Start Exercises at the facility. We understand that nine hard copies will need to be submitted in person, one of which will be stamped and kept for Navy's record.

The Filing Fee of \$1,586.32 is being processed by the Navy and will be submitted to the AQMD.

Please let us know if you have any questions or need any other information in support of the petition.

Thank you.



Massie Hatch, PE, CPP

President
[REDACTED]
[REDACTED]

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