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

In the Matter of  
UNITED STATES NAVY,  
Facility ID# 146536

Case No. 4518-10  
**DECLARATION OF FRANK  
WILLIAMSON**  
District Rules 203(b) and 3002(c)  
  
Hearing Date: August 29, 2024  
Time: 9:30 a.m.  
Place: 21865 Copley Drive  
Diamond Bar, CA 91765-0940

This declaration is submitted pursuant to South Coast AQMD Hearing Board Rule 4.

I, Frank Williamson, state:

1. I am the Environmental Compliance Specialist in charge of compliance for the relevant equipment subject to variance petition 4518-10. If called as a witness, I will testify to the following based on personal knowledge.
2. Petitioner operates a naval installation on San Clemente Island off the coast of California (the “Facility”). The Petitioner has an auxiliary landing field there, and conducts uniquely vital military training and testing. The facility is integral to the vast complex of land and sea ranges in the southwestern United States and the ocean off the coast of California.

1           3.       The Island is about 22 miles long and 4 miles wide. It is a very rugged landscape  
2 rising up to almost 2000 feet above sea level at its highest point, cut by canyons. It is about 70  
3 miles off the coast, and about 20 miles from Santa Catalina Island.

4           4.       The equipment subject to this petition is two Internal Combustion Engines: Device  
5 ID Nos. D21 & D200, located at the Facility, (the “Equipment”). The equipment powers backup  
6 generators which run vital communications equipment in the event of failure of the power grid. It  
7 is subject to Title V Facility PTO No. 800263.

8           5.       Petitioner is in violation of Rules 203(b) and 3002(c)(1) {from Section D,  
9 Condition No. C1 .1 of Title V Facility PTO No. 800263} of the South Coast Air Quality  
10 Management District Rules and Regulations, because a wild fire caused catastrophic damage to  
11 the electrical grid. Site power will take at least a year to restore.

12          6.       Equipment has exceeded and will exceed the 200 hour per year operating limit  
13 imposed by its permit under relevant rules. Petitioner was granted an ex parte emergency  
14 variance, dated August 2, 2024 from the relevant annual hour limits. The equipment exceeded its  
15 hour limit for 2024 on August 3, 2024. It will exceed its hour limit for 2025 in early 2025.

16          7.       The violation is caused by a fire that consumed 13,000 acres and nine miles of  
17 power lines which furnished grid power. The fire also damaged 161 power poles and a  
18 transformer. This was beyond the Petitioner’s control. The Navy is in the process of hiring  
19 qualified contractors via a legally mandatory fair and open contracting process to repair/replace  
20 the affected equipment. This process may take several months.

21          8.       In addition, the magnitude of the damage, the island’s remote location, and its  
22 rugged landscape further complicates repairs, probably drawing the process out to at least a year.

23          9.       The assets supported by the Equipment consist of over 400 pieces of  
24 communication equipment that include radar, microwave transceivers, and tactical data links in  
25 the Mount Thirst and Vista areas of the Facility. These are high points on the Island. Mount  
26 Thirst is 1965 feet above sea level. Vista is somewhat lower. The equipment also supports  
27 functions for the US Air Force, Coast Guard Rescue 21, Sheriff’s Department, FAA, and  
28 academic research labs. Rescue 21 is the Coast Guard’s advanced command, control and

1 direction-finding communications system, which was created to better locate mariners in distress  
2 and save lives and property at sea.

3 10. The foregoing assets are critical to national defense in that they support training of  
4 personnel and testing of equipment, and they are critical to civilian functions in that they support  
5 air traffic coordination and search and rescue functions. Shutting the equipment down would  
6 eliminate lawful activities which constitute vital government functions.

7 11. Shutting down the engines would cause significant harm to Petitioner and to vital  
8 governmental functions, and would outweigh the benefit to air quality if the emissions associated  
9 with the variance request were eliminated as a result of denying the variance. This is not to  
10 minimize the excess emissions. They shall be calculated, recorded, and reported with fees paid  
11 consistent with Rule 303.

12 12.  
13 Petitioner is providing *estimated* excess emission at 100 per cent load, however, Petitioner has  
14 records that justify calculation at a lesser load. At 100 percent load emissions would be as  
15 follows: source Daily Consumption(1000 Gal) CO lb/day NOx 1b/day PM10 lb/day ROG  
16 1b/day  
17 D 21 .6326 63.6 292.47 21.19 23.72  
18 D200 .2048 72.52 45.8 3.24 8.53

19 13. Petitioner has requested calculating the actual excess emissions for the purpose of  
20 associated fees pursuant to District Rule 3 based on actual fuel usage records, to be provided  
21 pursuant to the requested Order and as agreed to by the District.

22 14. The emissions will not cause any nuisance. They are not near receptors on the  
23 Island, and they are about 70 miles from the mainland and about 20 miles from Santa Catalina  
24 Island.

25 15. Petitioner rarely runs D21 or D200 at 100 per cent of the fuel load even during the  
26 most extreme emergency situation. In the case of D21 and D200, historic records support this.  
27 The 2023 Annual Emission Report (AER) submitted to the District reported 185.96 gallons  
28 consumed at Mt. Thirst and 142.19 gallons consumed at Vista. Operating hours were reported in  
the 2023 AER as 19.4 hours for Mt. Thirst and 56.7 hours at Vista, meaning consumption is 9.59

1 gal/Hr at Mt. Thirst and 2.51 gal/Hr at Vista. 100 per cent load rates for these are 26.36 gal/Hr  
2 for D21 and 8.68 gal/Hr for D200. The 50 per cent load rate is therefore more conservative than  
3 the historic numbers.

4 16. Curtailment or shutdown has been considered. However, the effect on vital  
5 governmental functions is too great. Therefore, Petitioner seeks a variance.

6 17. Petitioner will reduce excess emissions to the maximum extent feasible. While it is  
7 not feasible to shut down the equipment for any significant amount of time, Petitioner is currently  
8 making an effort to obtain lower emission portable engines to operate at the relevant sites,  
9 therefore reducing emissions to the maximum extent feasible.

10 18. Petitioner will monitor, record, and report emissions consistent with the conditions  
11 set forth in the variance.

12 19. Petitioner has complied with all of the conditions imposed by the ex parte variance  
13 in this matter dated August 2, 2024. I incorporate by reference the evidence given for the ex parte  
14 variance granted in this matter.

15 20. At present, 15 days for payment is not adequate for the Navy's processes. Our  
16 current payment path involves transferring Electronic funds from an existing Air Expenses  
17 account. This process may take thirty days and sometime more. Therefore, Petitioner requests  
18 forty-five (45) days to remit payment after receiving written notice.

19  
20 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
21 true and correct. Executed this 27<sup>th</sup> day of August 2024 at San Diego, California.

22  
23 By: \_\_\_\_\_  
24 FRANK WILLIAMSON  
25 Environmental Protection Specialist  
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