

SOUTH COAST AQMD
CLERK OF THE BOARD

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

2023 MAR -7 AM 8:11

PETITIONER: LARICS MML LMR (Los Angeles Regional CASE NO: 10234-1

Interoperable Communications System) FACILITY ID: 195322

FACILITY ADDRESS: 10875U Santa Clara Truck Trail

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

City, State, Zip: Canyon Country, CA, 91390

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).

Nancy Yang

Paul Gamarra

2525 Corporate Place

2525 Corporate Place

Monterey Park, CA

Monterey Park, CA

Zip 91754

Zip 91754

☎ (323) 882-8049 Ext.

☎ (951) 488-4242 Ext.

Fax ()

Fax ()

E-mail info@la-rics.org

E-mail paul.gamarra@jacobs.com

3. RECLAIM Permit ☐ Yes ☒ No Title V Permit ☐ Yes ☒ No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

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)

Included as an attachment is the log of utility power outages that have occurred this year. The recent storms have led to a particularly lengthy outage going beyond what we have typically seen for the site. Reports we received from our power provider SCE (via text and verbal communications) gave LARICS the impression of a quick resolution, however the outage has continued beyond what was initially expected. This winter season has been particularly arduous for SCE with a heightened level of outages being seen across the county. The generator is now at 150 hours and may soon surpass the 200-hour limit for 2023 if the current outage is not restored within the next few days.

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

The Los Angeles Regional Interoperable Communications System (LA-RICS) is a radio network dedicated entirely to emergency responders. The Land Mobile Radio (LMR) system creates a unified regional network of sites to provide communication service to emergency responders. The network eliminates barriers that normally impeded multi-jurisdictional responses and allows police, firefighters and paramedics to communicate directly with other users outside of their particular agency to streamline the response. Federal, State, and local agencies use the network. The network was Federally funded to uphold public safety grade standards, one specific attribute is that each site is backed-up by an emergency generator that will automatically start once commercial utility is lost.

It is imperative to public safety that the network stays online with power despite the recent SCE power outages so that Federal, State and local public safety entities will be able to maintain critical communications services.

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)*
Internal Combustion Engine, Cummins Model No. QSB5-G13, Diesel-Fueled, 4-Cylinder, Turbocharged and Aftercooled, rated at 1736 BHP, Driving an Emergency Electrical Generator	G66628	N/A	N/A

*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 piece of equipment LARICS is seeking a variance on is the emergency backup generator for our wireless communications facility. The facility provides wireless communications (Land Mobile Radio) for emergency public safety entities making it imperative for public safety that the system stays online during blackouts or other power outages. The site layout drawing for this facility can be found as a part of the CERS filing attached for reference.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐
 If yes, how often: Every 6 mo. and/or every 100 hours of use. Date of last maintenance and/or inspection 11/22/22

Describe the maintenance and/or inspection that was performed.

Visual inspection was performed on generator and fuel system to check for leakage or other faults, no issues were found, fuel monitoring console check found no issues. Cummins performs routine oil changes, fuel filter replacement and confirms no leaks.

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
2004 (f)(1) [Condition No. 4 of Facility P/O No. G66628]	Due to multiple recent SCE power outages, the Emergency backup generator will soon pass 200 hours.

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 ☒

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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.

LARICS is a Joint Powers Authority that is chartered to build and operate a critical communications radio network, which provides wireless communication services for Public Safety emergency personnel throughout LA County and interoperates with local, State and Federal agencies. Due to the recent weather emergency that has taken place within the past week. As well as the heavy storms that preceded it Southern California Edison (SCE) who is the regional public utility provider, has had difficulties keeping power on for their customers. SCE reported multiple outages in the Angeles Forest in recent months and at least one of the most recent outages has impacted the MML site. Once the commercial utility was lost, the site's automatic transfer switch started the emergency generator to continue the supply of electricity. Included in the attached are the individual outages occurring this year.

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).

On February 25th 2023 LARICS alarm system showed utility power was lost for the site as of 8:35am. Since then we have been in communications with Southern California Edison (SCE) letting us know that power was to be restored within a few days. As of 3/3/2023 SCE believed their power to be restored and so we have sent LARICS personnel to the site to verify as our alarm system is still reporting a lack of power. However,

due to the State declared weather emergency and road conditions that made the site unreachable on 3/3/2023 the LA-RICS staff was not able to reach the site and it is questionable as to whether or not SCE's distribution is actually sending power to the site since they have also reported widespread outages in the Angeles Forest to due the heavy snowfall last week. Therefore, the site will continue to run on generator until SCE power is restored.

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

In order to achieve compliance, we are filing this variance request to exceed the 200 hour limit provided. We are unable to control the utility company's outage frequency and can only monitor and request updates from SCE to confirm when power is restored.

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):

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

If LARICS was unable to operate the emergency generator during current and future power outages for the year it would pose a major public safety risk. Emergency services rely on the LARICS network for wireless communication extending throughout the remote regions of Los Angeles County. Losing power for this site would not only hurt coverage for the localized area but would hurt system performance and reliability for the rest of the county due to critical microwave links that this MML site provides.

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

As a public safety critical operation there is no ability to terminate operations, the system needs to stay online in order to provide emergency services the ability to communicate. Generators are programed and setup to immediately shut down upon restoration of utility power using an Automatic Transfer Switch (ATS).

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)
Diesel Fuel (300-4000 ppm Sulfur) – NO _x + NMHC	2.91g/BHP- hr = 26.64 lbs/day	2.91g/BHP- hr = 26.64 lbs/day	0
Diesel Fuel (300-4000 ppm Sulfur) – CO	0.29g/BHP- hr = 2.65 lbs/day	0.29g/BHP- hr = 2.65 lbs/day	0

Diesel Fuel (300-4000 ppm Sulfur) -- PM	0.01g/BHP-hr = 0.09 lbs/day	0.01g/BHP-hr = 0.09 lbs/day	0
---	-----------------------------	-----------------------------	---

* Column A minus Column B = Column C

Excess Opacity: _____ %

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

Excess emissions will drop to 0 upon restoration of utility power provided by the regional electrical utility provider Southern California Edison. Cummins (the generator manufacturer) supplies emissions data in g/BHP-hr, estimated the conversion by multiplying against worst case conditions with 173BHP for 24 hours.

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.

As a public safety communications provider and critical infrastructure operator, LA-RICS cannot terminate its operations if the regional electrical utility power loses any portion of its distribution serving the MML site. The system needs to stay online in order to provide emergency service providers the ability to communicate. Generators are programmed and setup to immediately shut down upon restoration of utility power using an Automatic Transfer Switch (ATS). Outside of monthly startup testing, excess emissions will not be produced since the generator will stop running upon restoration of the commercial utility power.

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.**

Generator usage and Utility power status will continue to be monitored by our alarm system allowing for updates on total hourly usage to be supplied for any required frequency. See attached example report showing outages for the year.

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.

LARICS is seeking a variance on AQMD permit to operate 2004 (f)(1)[Condition No. 4 of Facility P/O No. G66628] which states 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 and no more than 4.2 hours in any one month for maintenance and testing purposes. Resolution to the potential violation for this limit is dependent on restoration of utility power by SCE for which LARICS has no control over as well as the probability for future outages by SCE for the remainder of the year.

24. State the date you are requesting the variance to begin: 3/3/2023; and the date by which you expect to achieve final compliance: 1/1/2024.

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:

AQMD renewal on the 200hour limit will rest on January 1st of next year. With 200 hours soon to be passed, compliance can not occur until the limit is reset.

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.

Justin Delfino _____ Jacobs Engineering LA-RICS Program Director _____

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 _____ 3/3/2023 _____, at _____ Los Angeles _____, California



Signature _____

Justin Delfino on behalf of LA-RICS Executive Director Scott Edson
Print Name

Title: Program Director _____

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

ITEM 1

Type of Variance Requested:

- (a) **SHORT:** If compliance with District rule(s) can be achieved in 90 days or less, request a short variance. *(Hearing will be held approximately 21 days from date of filing--10-day posted notice required.)*
- (b) **REGULAR:** If compliance with District rule(s) will take more than 90 days, request a regular variance. If the variance request will extend beyond one year, you must include a specific detailed schedule of increments of progress [see Page 8, No. 24] under which you will achieve final compliance. *(Hearing will be held approximately 45 days from date of filing--30-day published notice required.)*
- (c) **EMERGENCY:** If non-compliance is the result of an unforeseen emergency, such as a sudden equipment breakdown, power failure, or accidental fire, you may request an emergency variance. You may request an *ex parte* emergency variance in addition to an emergency variance. **An emergency variance cannot be granted for more than 30 days.** *(Hearing will be held within 2 working days from the date of filing, whenever possible, excluding Mondays, weekends, and holidays.) If you request an emergency variance, you must answer No. 4 on page 1.*
- (d) **EX PARTE EMERGENCY:** If variance coverage is required on a weekend or when the Board is not in session, and you cannot wait until an emergency variance hearing can be held, you may request an *ex parte* emergency variance. An *ex parte* emergency variance will be granted or denied solely on the information contained in the petition and the District's response to the petition. Under most circumstances, an *ex parte* emergency variance will remain in effect only until a hearing can be held. **If you request an *ex parte* variance, you must answer No. 4 on page 1.**
- (e) **INTERIM:** If you require immediate relief (other than for emergencies) to cover the time until a short or regular variance hearing can be held request an interim variance. If you request an interim variance, you must also request a short or a regular variance on the same petition. *(Hearing will be held approximately 2 working days from date of filing, whenever possible, excluding Mondays, weekends and holidays.) If you request an interim variance, you must answer No. 4 on page 1.*

ITEM 4

GOOD CAUSE: The Hearing Board is required to provide public notice of variance hearings, as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an Interim, *Ex Parte* Emergency or Emergency Variance hearing without the required public notice, a petitioner must present facts which will support a determination by the Board that "good cause" exists to hear a variance without notifying the public about the variance and providing the public with an opportunity to present evidence concerning the variance.

ITEM 6

Example #1:

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Tenter frame		D32	
Chrome-plating tank	M99999		
Bake oven	123456		
Create special effects (fog)	N/A	N/A	N/A
Mfg., sale, distribution, use of non-compliant coating	N/A	N/A	12/10/95

ITEM 9

a) If you are requesting relief from Rule 401 and the excess opacity during the variance period will reach or exceed 40%, you should also request relief from California Health and Safety Code Section 41701.

b) If you are requesting relief from a permit condition(s), you should also request relief from the rule requiring compliance with conditions of the permit: 202(a), (b) or (c) - Temporary Permit to Operate; 203(b) - Permit to Operate; 2004(f)(1) – RECLAIM Permit; 3002(c) – Title V Permit.

Example #2:

Rule	Explanation
404(a)	tenter frame is vented to damaged air pollution control equipment
2004 (f)(1) [Condition No. 28-2 of Facility P/O No. 0999999]	source test cannot be conducted as required until new ESP is installed
1113(c)(2)	petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter
401(a) & California H&S Code Section 41701	Opacity will exceed 45%.

ITEM 24

Example #3:

Sample Schedule of Increments of Progress

- Permit application(s) will be submitted to the District by [date].
- Contracts for the purchase of emission control systems will be awarded by [date].
- On-site construction will be completed by [date].

(Petition for Variance: Revised February 22, 2011)

English	<i>"If you require a language interpreter in order to participate in the hearing, contact the Clerk of the Board at least five (5) calendar days before your hearing at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov. Specify the case name and number, hearing date, and the language for which you are requesting an interpreter."</i>
Farsi	"اگر برای شرکت در جلسه استماع به مترجم نیاز دارید، حد اقل پنج (5) روز تقویمی قبل از جلسه استماع، با منشی هیئت توسط شماره تلفن 909-396-2500 یا بوسیله نامه الکترونیکی با نشانی clerkofboard@aqmd.gov تماس بگیرید. نام پرونده و شماره آن، تاریخ جلسه استماع و زبانی را که برای آن مترجم درخواست کرده اید، مشخص کنید"
Arabic	"إذا كنت في حاجة لمترجم من أجل المشاركة في جلسة الاستماع، اتصل بكتّاب المحكمة قبل موعد جلسة الاستماع بخمسة (5) أيام على هاتف 2500-396-909. حدد اسم ورقم القضية و تاريخ الاستماع واللغة التي تريد في clerkofboard@aqmd.gov 909-396-909 أو بالبريد الإلكتروني على مترجم لها."
Armenian	"Դիմվողները պահանջելու համար, եթե թարգմանչի կարիքն ունենաք, նախքան ձեր ունկնդրությունը, ամենաքիչն հինգ (5) օրացույցային օրից առաջ կապվեք հաճախարիչի բաղադրարի հետ, 909-396-2500 հեռախոսահամարով կամ էլեկտրոնային հասցեով clerkofboard@aqmd.gov ։ Նշեք գործի անունը և համարը, ունկնդրության փյախանը, և լեզուն, որի համար թարգմանչի էք ցանկանում"
Vietnamese	"Nếu quý vị cần Thông Dịch Viên cho buổi điều trần, xin vui lòng điện-thoại cho Thư Ký Hội Đồng tại số 909-396-2500 trễ nhất là năm [5] ngày, không tính hai ngày Thứ Bảy và Chủ Nhật, trước buổi điều trần hoặc gửi điện thư đến clerkofboard@aqmd.gov . Nhớ ghi rõ tên và số hồ sơ, ngày điều trần, và ngôn ngữ quý vị cần có người để thông dịch."
Chinese	如果你要求翻譯來協助你參加聽證會，請在你的聽證會前至少提前五天（5個日曆日）打電話到909-396-2500或發電子郵件到 clerkofboard@aqmd.gov 與局裏的辦事人員聯絡。並且明確說明你的案子的名稱和號碼，聽證日期，以及你要求的翻譯的語種。
Japanese	公聴会（ヒアリング）に参加するために通訳が必要な場合、少なくとも5日前までに事務局（Clerk of the Board）にご連絡ください。電話でのご連絡は909-396-2500、eメールでのご連絡は clerkofboard@aqmd.gov までお願いします。その際、案件名（case name）と案件番号（case number）、ヒアリングの日付、通訳が必要な言語を特定して下さい。
Korean	"만약 귀하나 귀하의 증인들이 심리에 참여하기 위해 통역사가 필요하시면, 심리일 5일 전까지 기관부서의 서기에게 909-396-2500으로 연락하시거나, clerkofboard@aqmd.gov 로 연락 하십시오. 통역이 필요하신 사건의 이름, 심리날짜, 그리고 언어를 정확하게 말씀해 주십시오."
Spanish	Si usted requiere un intérprete para poder participar en la audiencia, favor de comunicarse con el Secretario de la Junta cuando menos cinco (5) días hábiles antes de su audiencia al teléfono (909) 396-2500 ó por correo electrónico al clerkofboard@aqmd.gov . Especifique el nombre y el número de su causa, la fecha de la audiencia y el idioma del cual está solicitando el intérprete.
Tagalog	"Kung kailangan ninyo nang interpreter sa Pilipino para makasali kayo sa pagdinig sa kaso, tumawag lang po kayo sa Clerk of the Board sa numero 909-396-2500 or kung hindi mag-email kayo sa email clerkofboard@aqmd.gov . Kailangan na tumawag kayo sa loob nang limang araw (5 days) bago ang inyong hearing date at ibigay and inyong pangalan at case number, araw nang inyong pagdinig sa kaso at inyong gusto na may lenguahe na interpreter"
Thai	หากคุณต้องการล่ามในการขึ้นศาล ให้ติดต่อเจ้าหน้าที่ล่วงหน้าอย่างน้อย 5 วันก่อนวันขึ้นศาล โดยติดต่อที่เบอร์โทร 909-396-2500 หรือโดยe-mailที่ clerkofboard@aqmd.gov ให้ออกชื่อและหมายเลขของคุณ พร้อมทั้งวันเวลาในการขึ้นศาล และระบุภาษาที่คุณต้องการล่าม



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

Page 1

Permit No.
G66628
A/N 631670

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:

LARICS MML LMR
725 S FIGUEROA ST, SUITE 1855
LOS ANGELES, CA 90017

ID 195322

Equipment Location: 10875U SANTA CLARA TRUCK TRAIL CANYON COUNTRY, CA 91390

Equipment Description :

Internal Combustion Engine, Cummins Model No. QSB5-G13, Diesel-Fueled, 4-Cylinder, Turbocharged and Aftercooled, rated at 173 BHP, 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).



FILE COPY
South Coast Air Quality Management District
Certified Copy



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

PERMIT TO OPERATE

Page 2
Permit No.
G66628
A/N 631670

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.



FILE COPY
South Coast Air Quality Management District
Certified Copy



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

PERMIT TO OPERATE

Page 3
Permit No.
G66628
A/N 631670

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/SB07

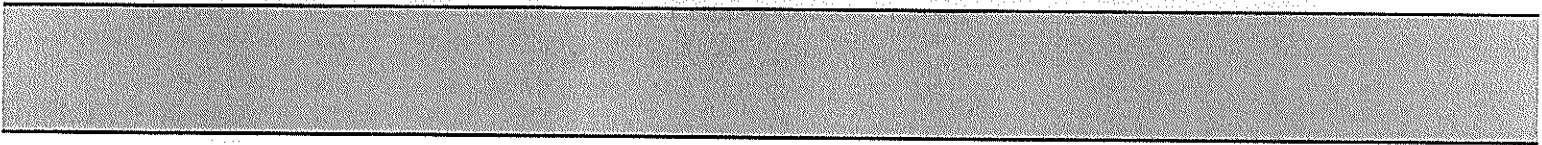
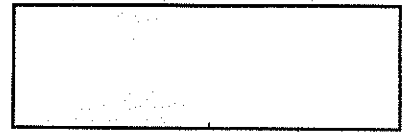
10/8/2021



FILE COPY
South Coast Air Quality Management District
Certified Copy



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



South Coast Air Quality Management District
Certified Copy

DPS Telecom
Cumulative Time

Proprietary and Confidential
 2023-03-03 12:03:56

Start of Interval: 01/01/2023 00:00
 End of Interval: 03/03/2023 12:00
 Windows: 3
 Ports: 1-500,RP,IA,K1,K2,NG,N2,1000-1022 Addresses: 57
 Displays: 1 Points: 13-20
 Where Description Contains: "Online"

Device	Alert Desc.	Start	Stop	Duration(sec.)	Duration(hr.)	Cumulative(hr.)
MML-NG	Generator: Online	01/02/2023 07:57:14	01/02/2023 08:12:29	915	0.2542	0.2542
MML-NG	Generator: Online	01/04/2023 11:07:21	01/04/2023 11:17:24	603	0.1675	0.4217
MML-NG	Generator: Online	01/09/2023 07:57:31	01/09/2023 08:12:06	875	0.2431	0.6647
MML-NG	Generator: Online	01/16/2023 07:57:14	01/16/2023 08:12:05	891	0.2475	0.9122
MML-NG	Generator: Online	01/23/2023 07:57:15	01/23/2023 08:11:56	881	0.2447	1.1569
MML-NG	Generator: Online	01/30/2023 07:57:20	01/30/2023 08:11:47	867	0.2408	1.3978
MML-NG	Generator: Online	02/06/2023 07:57:02	02/06/2023 08:11:52	890	0.2472	1.6450
MML-NG	Generator: Online	02/13/2023 07:56:52	02/13/2023 08:11:43	891	0.2475	1.8925
MML-NG	Generator: Online	02/20/2023 07:56:36	02/20/2023 08:11:45	909	0.2525	2.1450
MML-NG	Generator: Online	02/25/2023 08:35:41		530659	147.4053	149.5503

History -> Cumulative Time



**Power
Generation**

2016 EPA Tier 3 Exhaust Emission Compliance Statement C100D6C Stationary Emergency 60 Hz Diesel Generator Set

Compliance Information:

The engine used in this generator set complies with U.S. EPA New Source Performance Standards for Stationary Emergency engine under the provisions of 40 CFR Part 60 Subpart IIII when tested per ISO 8178 D2.

Engine Manufacturer: Cummins Inc
EPA Certificate Number: GCEXL0275AAK-012
Effective Date: 11/04/2015
Date Issued: 11/04/2015
EPA Engine Family (Cummins Emissions Family): GCEXL0275AAK

Engine Information:

Model: Cummins QSB5-G5
Engine Nameplate HP: 176
Type: 4 Cycle, In-line, 4 Cylinder
Diesel Aspiration: Turbocharged
Emission Control Device: Turbocharged and Charge Air Cooled

Bore: 4.21 in. (106.9 mm)
Stroke: 4.88 in. (123.9mm)
Displacement: 272 cu. In. (4.45 liters)
Compression Ratio: 17.3:1
Exhaust Stack Diameter : 3.5 in (89 mm)

Diesel Fuel Emission Limits

D2 Cycle Exhaust Emissions

	Grams per BHP-hr			Grams per kWm-hr		
	<u>NOx + NMHC</u>	<u>CO</u>	<u>PM</u>	<u>NOx + NMHC</u>	<u>CO</u>	<u>PM</u>
Cert Test Results - Diesel Fuel (300-4000 ppm Sulfur)	2.91	0.29	0.01	3.80	0.90	0.15
EPA Emissions Limit	2.98	2.61	0.15	4.00	3.50	0.20

Test Methods: EPA/CARB emissions recorded per 40CFR89 (ref. ISO8178-1) and weighted at load points prescribed in Subpart E, Appendix A for Constant Speed Engines (ref. ISO8178-4, D2)

Diesel Fuel Specifications: Cetane Number: 40-48. Reference: ASTM D975 No. 2-D.

Reference Conditions: Air Inlet Temperature: 25°C (77°F), Fuel Inlet Temperature: 40°C (104°F). Barometric Pressure: 100 kPa (29.53 in Hg), Humidity: 10.7 g/kg (75 grains H₂O/lb) of dry air; required for NO_x correction, Restrictions: Intake Restriction set to a maximum allowable limit for clean filter; Exhaust Back Pressure set to a maximum allowable limit.

Tests conducted using alternate test methods, instrumentation, fuel or reference conditions can yield different results.
Engine operation with excessive air intake or exhaust restriction beyond published maximum limits, or with improper maintenance, may result in elevated emission levels.

MML Magic Mountain Link (CERSID: 10877689)**Facility Information** **Submitted Jun 16, 2022**Submitted on 6/16/2022 5:54:06 PM by *Mark Chercoe* of LARICS LMR (Los Angeles, CA)

- Business Activities
- Business Owner/Operator Identification

Hazardous Materials Inventory **Submitted Jun 16, 2022**Submitted on 6/16/2022 5:54:06 PM by *Mark Chercoe* of LARICS LMR (Los Angeles, CA)

- Hazardous Material Inventory (2)
- Site Map (Official Use Only)
 - *Annotated Site Map (Official Use Only)* (Adobe PDF, 743KB)
 - *Annotated Site Map (Official Use Only)* (Web graphic, 173KB)
 - *Annotated Site Map (Official Use Only)* (Web graphic, 183KB)

Aboveground Petroleum Storage Act **Submitted Jun 16, 2022**Submitted on 6/16/2022 5:54:06 PM by *Mark Chercoe* of LARICS LMR (Los Angeles, CA)

- Aboveground Petroleum Storage Act Documentation
 - Provided In Submittal Element: Hazardous Materials Inventory
- APSA Facility Information

Site Identification**MML Magic Mountain Link**10875 Santa Clara Truck Trl
Canyon Country, CA 91390County
Los AngelesCERS ID
10877689
EPA ID Number**Submission Status**

Submitted on 6/16/2022 by Mark Chercoe of LARICS LMR (Los Angeles, CA)

Hazardous Materials

Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive inventory local reporting requirements (shown below if present); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?

Yes

Underground Storage Tank(s) (UST)

Does your facility own or operate underground storage tanks?

No

Hazardous Waste

Is your facility a Hazardous Waste Generator?

No

Does your facility treat hazardous waste on-site?

No

Is your facility's treatment subject to financial assurance requirements (for Permit by Rule and Conditional Authorization)?

No

Does your facility consolidate hazardous waste generated at a remote site?

No

Does your facility need to report the closure/removal of a tank that was classified as hazardous waste and cleaned on-site?

No

Does your facility generate in any single calendar month 1,000 kilograms (kg) (2,200 pounds) or more of federal RCRA hazardous waste, or generate in any single calendar month greater than 1 kg (2.2 pounds) of RCRA acute hazardous waste; or generate more than 100 kg (220 pounds) of spill cleanup materials contaminated with RCRA acute hazardous waste.

No

Is your facility a Household Hazardous Waste (HHW) Collection site?

No

Excluded and/or Exempted Materials

Does your facility recycle more than 100 kg/month of excluded or exempted recyclable materials (per HSC 25143.2)?

No

Does your facility own or operate ASTs above these thresholds? Store greater than 1,320 gallons of petroleum products (new or used) in aboveground tanks or containers.

Yes

Does your facility have Regulated Substances stored onsite in quantities greater than the threshold quantities established by the California Accidental Release prevention Program (CalARP)?

No

Additional Information

No additional comments provided.

Facility/Site

MML Magic Mountain Link

10875 Santa Clara Truck Trl
Canyon Country, CA 91390CERS ID
10877689

Submittal Status

Submitted on 6/16/2022 by Mark Chercoe of LARICS LMR (Los Angeles, CA)

Identification

LA County - LARICS Project

Operator Phone
(323) 881-8292Business Phone
(323) 881-8292

Business Fax

Beginning Date

Ending Date

Dun & Bradstreet

SIC Code

Primary NAICS

Facility/Site Mailing Address

725 S Figueroa St Ste 1855
Los Angeles, CA 90017

Primary Emergency Contact

Mark Chercoe

Title

Env Compliance Manager

Business Phone
(858) 382-457924-Hour Phone
(858) 382-4579

Pager Number

Owner

Los Angeles Regional Interoperable Communications System Authority
(323) 881-8292
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

Secondary Emergency Contact

Title

Business Phone

24-Hour Phone

Pager Number

Billing Contact

Mark Chercoe

(858) 382-4579

mchercoe@pyramidns.com

725 S Figueroa St Ste 1855
Los Angeles, CA 90017

Environmental Contact

Mark Chercoe

(858) 382-4579

mchercoe@pyramidns.com

725 S Figueroa St, 1855
Los Angeles, CA 90017

Name of Signer

Mark Chercoe

Signer Title

Environmental Coordinator

Document Preparer

Mark Chercoe

Additional Information

Locally-collected Fields

Some or all of the following fields may be required by your local regulator(s).

Property Owner

Phone

Mailing Address

Assessor Parcel Number (APN)

Number of Employees

0

Facility ID

LACoFA0054430

Hazardous Materials And Wastes Inventory Matrix Report

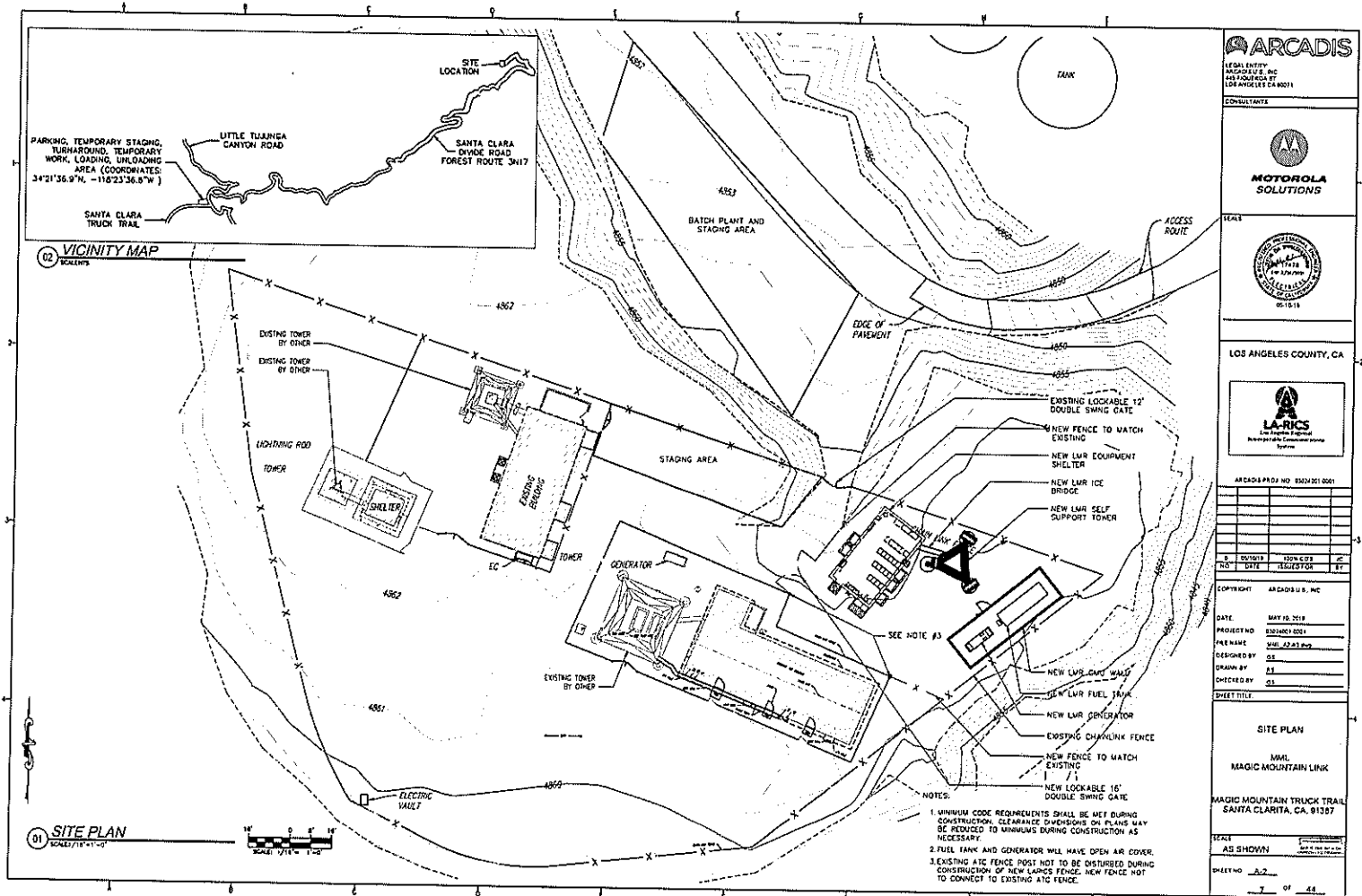
CERS Business/Org: **LARICS LMR**
Facility Name: **MML Magic Mountain Link**
10875 Santa Clara Truck Trl, Canyon Country 91390
Chemical Location: **Generator enclosure**
CERS ID: **10877689**
Facility ID: **LACoFA0054430**
Status: **Submitted on 6/16/2022 5:54 PM**

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
DOT: 3 - Flammable and Combustible Liquids	Diesel Fuel No. 2	Gallons	3323	3323	3323	0	- Physical			
		<u>State</u>	<u>Storage Container</u>		<u>Pressure</u>		Flammable			
Combustible Liquid, Class II	68476-34-6	<u>Liquid</u>	<u>Aboveground Tank</u>		<u>Ambient</u>		- Health			
		<u>Type</u>	<u>Days on Site: 365</u>		<u>Temperature</u>		Carcinogenicity			
		<u>Pure</u>			<u>Ambient</u>		- Health Acute			
							Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health			
							Aspiration Hazard			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **LARICS LMR**
 Facility Name **MML Magic Mountain Link**
 10875 Santa Clara Truck Trl, Canyon Country 91390
 Chemical Location
In equipment room
 CERS ID **10877689**
 Facility ID **LACoFA0054430**
 Status **Submitted on 6/16/2022 5:54 PM**

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)			
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	Lead Acid Batteries CAS No.	Gallons	216	4.5	216	0	- Physical	Sulfuric Acid	40 %	✓	7664-93-9
		State	Storage Container		Pressure	792	Corrosive To				
		Liquid	Other		Ambient		Metal				
		Type			Temperature		- Health Skin				
		Mixture	Days on Site: 365		Ambient		Corrosion				
							Irritation				
							- Health Serious				
							Eye Damage Eye				
							Irritation				



Facility/Site

MML Magic Mountain Link

10875 Santa Clara Truck Trl
Canyon Country, CA 91390

CERS ID

10877689

Submittal Status

Submitted on 6/16/2022 by Mark Chercoe of LARICS LMR (Los Angeles, CA)

APSA Facility Information

Conditionally Exempt APSA Tank Facility

N

Date Of SPCC Plan Certification or Date of 5-Year Review

5/25/2022

Total Aboveground Storage Capacity of
Petroleum

Number of Tanks in Underground Area(s)

3323

0