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

FACILITY ADDRESS: 28303 Alicia Parkway
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]
City, State, Zip: Laguna Niguel, CA 92677

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

- INTERIM  [ ] SHORT  [x] REGULAR  [x] EMERGENCY  [x] 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).

Betty Burnett, General Manager
34156 Del Obispo St.  
Dana Point    Zip 92629
[ (949) 608-4122  Ext.  
Fax (  )
E-mail: bburnett@socwa.com

Amber Baylor, Director of Environmental Compliance
34156 Del Obispo St.
Dana Point    Zip 92629
[ (949) 576-5269  Ext.  
Fax (  )
E-mail: abaylor@socwa.com

3. RECLAIM Permit  [ ] Yes  [x] No  Title V Permit  [ ] Yes  [x] 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)

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]
The Aliso Canyon/Coastal Fire required the operation of the Coastal Treatment Plant, Facility ID14833, on an emergency generator, Permit M27820 which has an operating condition limit of 200 hours. Operation on emergency power was required due to the main circuit from Southern California Edison (SCE) offline. SOCWA is in communication with SCE to ascertain when SCE will be allowed into the affected fire area to assess the damage to its facilities and there is no estimate of time for return of power to the Coastal Treatment Plant. The SCE evaluation is contingent on approval of the fire incident command. SOCWA staff has requested of SCE as to when it will be able to arrive onsite for evaluation of the working order of the control switch to the facility. As of May 13, 2022, it is unclear if the circuit is in proper working condition. The return of power to the facilities is likely subject to short to longer term delay which will exceed the limit of 200 hours of authorized power generation. Please see below for summaries provided to the SOCWA Board of Directors on the status of the efforts related to the Aliso Canyon/Coastal fire. SOCWA is working as quickly as it can to restore power to the Coastal Treatment Plant to move off emergency generation power. Staff is monitoring the power generation on a 24-hour basis through overtime staffing from the Regional Treatment Plant. This request is to prevent sewer spills from the facility due to lack of power.

SOCWA Staff Updates to the SOCWA Board through three successive updates articulated below:

On 5/11/2022, “SOCWA activated it’s Emergency Operations Center to respond to the Aliso Canyon fire. The Coastal Treatment Plant staff has evacuated the Coastal Treatment Plant site. Prior to leaving the site staff provided access to South Coast Water District potable water lines for the Fire Department. All electrical service to the plant is out due to the fire. The Plant is currently operating on generator power and can do so for approximately five days. Diesel fuel was delivered to “top off” within the last 24 hours. Jim Burror is the Incident Commander for the SOCWA EOC at this time, and Sean Peachey, SOCWA Safety Officer is providing information to WERO. James Jones, CTP Chief Operator has been made available to the Incident Command for the fire itself. Amber Baylor will be notifying the Regional Water Quality Control Board of the status of the Plant.”

On 5/12/22, “As of 3:15 this afternoon the Coastal Plant remains operational on generator power. Staff is talking with AQMD about the operational hours limitations for the generator at this site and will have further information. RWQCB is aware that we have suspended water quality testing for a short time. SCE is assessing ability to return power to the site which won’t occur tonight, and they will let us know tomorrow what they believe they can do. Staff was able to be at the plant site for a short time today and we made the bathrooms, showers and Wi-Fi available to the fire fighters based at the site. ....”

5/13/22
Update as of 7:00 a.m. – “OCFA briefing is that containment remains at 15% and won’t be updated until 6 p.m. tonight. Jim and plant staff are preparing to return to CTP site for ongoing operations and assessing needs to maintain safe occupancy at the plant. SCE has not given a certainty of time for return of power. Considerations continue to be hours of run time for the generator (cap is 200 hours) and discussions are underway with AQMD (at approx. @ 2:00 p.m. run time will be 72 hours). There is availability for fuel delivery if needed, but there is fuel on site currently. From the OCFA Command Center the posted maps are showing containment barriers are established within the park areas (dozer cut or hand cut). Paved road from Woods Canyon Road is open to marked utility vehicles (SOCWA, SCWD should be able to access that route now). SOCWA staff will be assessing condition of the paved road (west side of creek) and the newly established decomposed granite easement on the east side of the creek (which has been heavily utilized in the fire fighting effort).

WEROC has shared that initial damage requests for estimates should now be started (state and federal aid) – debris removal, emergency protective measures and public utility costs would be included.
5. Briefly describe the type of business and processes at your facility.

Wastewater treatment facility.

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.

<table>
<thead>
<tr>
<th>Equipment/Activity</th>
<th>Application/ Permit No.</th>
<th>RECLAIM Device No.</th>
<th>Date Application/Plan Denied (if relevant)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>INTERNAL COMBUSTION ENGINE, CATERPILLAR, TURBO CHARGED- AFTER COOLED, FOUR STROKE, WATER-COOLED V-16 DIESEL, MODEL D 399, 1,195 HP, DRIVING AN ELECTRICAL GENERATOR, KATO, MODEL NO. 750-68336 1111, 75 KW, SERIAL NO. 83035 - Permit Attached for reference</td>
<td>M27820</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*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 equipment provides emergency backup power to provide water treatment and prevent sewer spills.

8. Is there a regular maintenance and/or inspection schedule for this equipment?  Yes ☑  No ☐  
If yes, how often:  Annual  Date of last maintenance and/or inspection  April 1, 2021  
Describe the maintenance and/or inspection that was performed.

Please see attached for services performed. Additionally, work was performed on the control system as part of the capital budget. SOCWA can provide additional records upon request. Annual maintenance is currently being scheduled.

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).
<table>
<thead>
<tr>
<th>Rule</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1470</td>
<td>Exceedance of the 200-hour limit.</td>
</tr>
<tr>
<td>Rule 203(b)</td>
<td>Due to exceedance of the 200-hour limit and the resultant increase in NOx, the ability to control pollutants would be suspended without written approval of this known exceedance due to emergency conditions.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Case No.</th>
<th>Date of Action</th>
<th>Final Compliance Date</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Case No.</th>
<th>Date of Action</th>
<th>Final Compliance Date</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]
We cannot restore power to the facility until Southern California Edison allows power to the Coastal Treatment Plant therefore, the power to the facility is outside of our Agency's control. It is our top priority to restore power to the facility as quickly as we can. The generator in use is integral to operation of the wastewater treatment plant for the protection of public health and the environment in accordance with State and Federal NPDES Permit until SCE power is restored.

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).

We began backup power generation on 5/11/2022 at 3pm. As of May 13, 2022 at 3pm we will be on 72 hours of back up power, with only ~128 hours, or just over 5 days remaining for compliance with the permit condition. It is uncertain the timeline for SCE to reach assessment of the fire damage to its facilities and the potential lead time for a new switch will be required for installation by SCE. In addition, we reached out to our permit engineer, Kristina Gonzalez, to ascertain our options to remain in a non-violation state. Please see below for the conversation that started on May 12, 2022. Ms. Gonzalez provided excellent advice to familiarize ourselves with the variance process due to the uncertain conditions. Due to the uncertainty in the circuit, SOCWA has decided to file for an ex parte emergency variance to avoid potential violations due to conditions out of our control.

5/13/22:

Thank you Kristina,

We discussed a variance but not sure if there were any other mechanisms that you were speaking to related to updated rules.

I appreciate you reaching back out to address my inquiry.
Best, Amber

Amber Baylor
Director of Environmental Compliance
South Orange County Wastewater Authority
34156 Del Obispo St.
Dana Point, CA
949-234-5409 (office)
949-576-5269 (mobile)

From: Kristina Gonzales <kgonzales@aqmd.gov>
Sent: Friday, May 13, 2022 7:29:26 AM
To: Amber Baylor <abaylor@socwa.com>
Cc: Betty Burnett <bburnett@socwa.com>; Jim Burror <jburror@socwa.com>
Subject: RE: Facility ID: 3664, Diesel Generator M27820

Good morning,

Sometimes rules give you some relief. You can look at 118 and 118.1. There may be others. Sometimes permit conditions do this as well (just like the old one you used to have). If there is nothing else, you can apply for a variance. Here’s a link for more information: https://www.aqmd.gov/nay/about/hearing-board/about-variances. It’s an involved process so it would be good to be familiar with it in case you need it in the future. It’s better to apply for a variance before you are in violation, if possible.

Kristina Gonzales
Air Quality Inspector III
kgonzales@aqmd.gov
909-396-2982
www.aqmd.gov

From: Amber Baylor <abaylor@socwa.com>
Sent: Thursday, May 12, 2022 7:44 PM
To: Kristina Gonzales <kgonzales@aqmd.gov>
Cc: Betty Burnett <bburnett@socwa.com>; Jim Burror <jburror@socwa.com>
Subject: Re: Facility ID: 3664, Diesel Generator M27820

Thank you, Kristina, for circling back on this.

We are projected to go back online in the next 48 hours, so I do not foresee any issues with exceeding the 200 hours.

However, just so I am aware in preparation for any natural type of disaster, can you please articulate what options would be on the table for future scenarios as we further develop emergency management scenarios.
Thank you, Amber

Amber Baylor
Director of Environmental Compliance
South Orange County Wastewater Authority
34156 Del Obispo St.
Dana Point, CA
949-234-5409 (office)
949-576-5269 (mobile)

From: Kristina Gonzales <kgonzales@aqmd.gov>
Sent: Thursday, May 12, 2022, 5:36 PM
To: Amber Baylor <abaylor@socwa.com>
Cc: Betty Burnett <bburnett@socwa.com>; Jim Burror <jburror@socwa.com>
Subject: RE: Facility ID: 3664, Diesel Generator M27820

Amber,

I apologize for the confusion. Thank you for sending a copy of your permit. I was able to locate it with the help of a permit engineer. It wasn’t stored in the usual database. I’ll make sure to include a note in my report for future inspectors.

The reissued permit (which you provided) supersedes the old ones. Therefore the permit condition you cited in your initial email is no longer valid. You are subject to the 200 hour annual limit. If you think you may exceed that limit, it would be a good idea to look into your options before exceeding the limit.

Kristina Gonzales
Air Quality Inspector III
kgonzales@aqmd.gov
909-396-2982
www.aqmd.gov

From: Amber Baylor <abaylor@socwa.com>
Sent: Thursday, May 12, 2022 3:50 PM
To: Kristina Gonzales <kgonzales@aqmd.gov>
Cc: Betty Burnett <bburnett@socwa.com>; Jim Burror <jburror@socwa.com>
Subject: RE: Facility ID: 3664, Diesel Generator M27820

Please see attached, Amber

From: Kristina Gonzales <kgonzales@aqmd.gov>
Sent: Thursday, May 12, 2022 3:32 PM
To: Amber Baylor <abaylor@socwa.com>
Cc: Betty Burnett <bburnett@socwa.com>; Jim Burror <jburror@socwa.com>
Amber,

I don’t see it as a permit condition. Can you provide a copy of the permit you have that states this limit?

Kristina Gonzales
Air Quality Inspector III
kgonzales@aqmd.gov
909-396-2982
www.aqmd.gov

Hi Kristina,

Yes, there is a condition limiting the annual operating hours to 200 hours or less and therefore not subject to 1110.2.

Best, Amber

Amber,

I appreciate the update. Hopefully everything is okay at your site and everyone is safe.

When you get the chance, let’s discuss the permit conditions. Since there is no condition limiting the annual operating hours to 200 hours or less, this engine would be subject to many other sections in Rule 1110.2 such as meeting emission limits and periodic source testing.

Kristina Gonzales
Air Quality Inspector III
kgonzales@aqmd.gov
909-396-2982
Good morning, Kristina,

I am reaching out to let you know that the Coastal Treatment Plant is currently in an emergency status, and we are running on backup generator power. Please see attached for more details. Please also see the following press release posted on our website:
https://www.socwa.com/coastal-aliso-canyon-fire/

Condition #2 in Permit M27820 states the following:

2. THE INTERNAL COMBUSTION ENGINE MUST NOT BE OPERATED FOR MORE THAN ONE HOUR PER DAY UNLESS AN EMERGENCY EXISTS DUE TO THE LOSS OF ELECTRICAL POWER FROM THE UTILITY COMPANY.

At ~3pm the Coastal Treatment Plant lost power from Edison and switched to back-up generation using the ICE in Permit M27820. The facility will continue to operate in standby power mode until a stable electrical connection can be restored.

I will reach back out to you regarding this update when I have further information to share.

Please advise if we need to provide anything further related to compliance related requirements.

Best, Amber

Amber Baylor, M.S., M.P.A., BCES
Director of Environmental Compliance
South Orange County Wastewater Authority
34156 Del Obispo St.
Dana Point, CA 92629
949-234-5409 (office), 949-576-5269 (mobile)
16. List date(s) and action(s) you have taken since that time to achieve compliance.

As of 5/13/22, SOCWA is applying for a variance.

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: $Potential fines associated with sewage spills into Aliso Creek and the Pacific Ocean, loss of beach access and environmental damage levied through associated resource agencies.
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).
The anticipated effect of loss of power would be sewage entering into Waters of the United States with potential harm to human life and the environment. Costs are unknown due to related spill clean up activities that would discharge to a coastally protected and marine protected area.

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

No, we need full power for the facility to operate and maintain treatment levels.

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.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>(A) Total Estimated Excess Emissions (lbs/day)</th>
<th>(B) Reduction Due to Mitigation (lbs/day)</th>
<th>(C) Net Emissions After Mitigation (lbs/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOX</td>
<td>372.84</td>
<td>0</td>
<td>372.84</td>
</tr>
</tbody>
</table>
* 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.

The EPA’s publication of: “REPORT ON REVISIONS TO 5TH EDITION AP-42 Section 3.4 Large Stationary Diesel and All Stationary Dual-fuel Engines” found in the following URL was utilized for the projected lbs/day condition: https://www.epa.gov/sites/default/files/2020-10/documents/b03s04.pdf

2.2.3 Controlled NOx The 5th Edition of AP-42 did not contain NOx emission factors for controlled diesel and dual fuel engines. There was sufficient NOx data from one test report to develop an emission factor for diesel engines controlled by ignition timing retard. This report contained NOx data from 12 diesel engines ranging in size from 860 to 3,600 hp. The data used to develop the controlled NOx emission factor is shown in Table 3. The controlled NOx emission factor is 1.9 lb/MMBtu (0.013 lb/hp-hr) with an overall rating of "B".

Table 3 from: https://www.epa.gov/sites/default/files/2020-10/documents/b03s04.pdf

The standby engine is rated at 1195hp, which is a controlled emission factor of 0.013lb/hp-hr. The calculation is (0.013lb/hp-hr * 1195hp) x 24 hours/day = 372.84lbs/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.

Not feasible due to the nature of the emergency.
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.

Based on diesel fuel discharge and run hours

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.

We do not anticipate achieving permit compliance until Southern California Edison power is restored.
24. State the date you are requesting the variance to begin: As soon as the facility exceeds 200 hours (approximately May 19, 2022); and the date by which you expect to achieve final compliance: ____________ Unknown ____________.

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.

Kristina Gonzalez _____________________________ Ext. 909-396-2982
Daphne Hsu dh-su@aqmd.gov _____________________________ Ext. ____________

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

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 May 13, 2022 ____________, at _1450pm ________________________, California
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.)

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]
(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:

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

**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:

<table>
<thead>
<tr>
<th>Rule</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>404(a)</td>
<td>tenter frame is vented to damaged air pollution control equipment</td>
</tr>
<tr>
<td>2004 (f)(1)</td>
<td>source test cannot be conducted as required until new ESP is installed</td>
</tr>
<tr>
<td>[Condition No. 28-2 of Facility P/O No. 099999]</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>1113(c)(2)</td>
<td></td>
</tr>
<tr>
<td>petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter</td>
<td></td>
</tr>
<tr>
<td>401(a) &amp; California H&amp;S Code Section 41701</td>
<td></td>
</tr>
<tr>
<td>Opacity will exceed 45%.</td>
<td></td>
</tr>
</tbody>
</table>

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)
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 prior to 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.

"أُجِبَ بِرَايَ مَرَكُوتْ تِمَّ لِجُلْسَةِ إِسْتِمَاعٍ بِهِ مَتَّرِجٌ نَّيْزِيٌّ دَارِيَ، حَدِ مُجَلْدَة (5) رُوُسُ پُقْسِيَّيْ يُنَّا لِجُلْسَةِ إِسْتِمَاعٍ، بِيِّ مَنْذِيَهُ تُنَقِّيَتْ مَمُتْحَبَتُهُمُ النُّفْسُ. يُلْبِسُ يَا مَثَلُ مَثَلًا. ثُمَّ يُرْسِعُهُ لِذَلِكَ بِكُلِّ مُجَلْسَةٍ إِسْتِمَاعٍ" clerkofboard@aqmd.gov.

"كمِّ مُسْرَفَةٍ لِجُلْسَةِ إِسْتِمَاعٍ وَزِيَّى رَأِ أنِّ مَتَّرِجٌ نَّيْزِيَ يُنَّا بِمُجَلْسَةِ إِسْتِمَاعٍ." clerkofboard@aqmd.gov

주의요실이 필요하신 사전의 이름, 심리날짜, 그리고 언어를 정확하게 말씀해 주십시오.

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 o kung hindi mag-email kayo sa email clerkofboard@aqmd.gov. Kailangan na tumawag kayo sa loob nang limang araw (5 days) bagong inyong hearing date at ibigay at inyong pangalan at case number, araw nang inyong pagdinig sa kaso at inyong gusto na may lenguaje na interpreter.

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 prior to 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.

doi không yêu cầu dịch viên để tham gia phiên tòa, vui lòng liên hệ với Thư Kỳ Hội Đồng tại số 909-396-2500 trễ nhất là năm 5 ngày, không tính hai ngày Thứ Bảy và Chủ Nhật, trước buổi tiến hành hoặc gửi điện thư đến clerkofboard@aqmd.gov. Như đã nói trên và số hỗ trợ, ngày điễn toán, và ngần nghĩ quý vị cần có người dịch thong đi."
PERMIT TO OPERATE

Legal Owner or Operator: SO ORANGE CO. WASTEWATER AUTHORITY-CTP
34156 DEL OBISPO ST
DANA POINT, CA 92629

Equipment Location: 28303-31 ALICIA PKY, LAGUNA NIGUEL, CA 92677-1355

Equipment Description:
INTERNAL COMBUSTION ENGINE, CATERPILLAR, EMERGENCY ELECTRICAL GENERATION, MODEL NO. D 359, DIESEL FUELED, TURBOCHARGED, AFTERCOOLED, 1,195 BHP.

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. THIS ENGINE SHALL NOT OPERATE MORE THAN 200 HOURS IN ANY ONE YEAR, WHICH INCLUDES NO MORE THAN 20 HOURS IN ANY ONE YEAR FOR MAINTENANCE AND TESTING PURPOSES.

4. AN OPERATIONAL NON-RESETTABLE TOTALIZING TIME METER SHALL BE INSTALLED AND MAINTAINED TO INDICATE THE ENGINE ELAPSED OPERATING TIME.

5. THE OPERATION OF THE ENGINE BEYOND THE 200 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. 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 BY THE UTILITY OR THE GRID OPERATOR.

7. AN ENGINE OPERATING LOG SHALL BE MAINTAINED WHICH ON A MONTHLY BASIS SHALL LIST ALL ENGINE OPERATIONS IN EACH OF THE FOLLOWING AREAS:

ORIGINAL
A. EMERGENCY USE HOURS OF OPERATION
B. MAINTENANCE AND TESTING HOURS
C. OTHER OPERATING HOURS (DESCRIPT THE REASON FOR OPERATION)
IN ADDITION, EACH TIME THE ENGINE IS STARTED MANUALLY, THE LOG SHALL INCLUDE THE DATE
OF OPERATION AND THE METER READING IN HOURS AT THE BEGINNING AND END OF OPERATION
THE LOG SHALL BE KEPT FOR A MINIMUM OF THREE CALENDAR YEARS PRIOR TO THE CURRENT
YEAR AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST. THE TOTAL HOURS OF
OPERATION FOR THE PREVIOUS CALENDAR YEAR SHALL BE RECORDED SOMETIME DURING THE
FIRST 15 DAYS OF JANUARY OF EACH YEAR.

8. THE OPERATOR SHALL COMPLY WITH ALL APPLICABLE REQUIREMENTS OF RULES 431.2 AND 1470.

THIS PERMIT TO OPERATE R-M27820 SUPERSEDES PERMIT TO OPERATE M27820 ISSUED 10/19/1982

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 RULES OF THE
AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT CANNOT BE CONSIDERED AS PERMISSION TO VIOLATE
EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF OTHER GOVERNMENT AGENCIES.

EXECUTIVE OFFICER

By Morris M. Bailey/MN02
2/22/2007

ORIGINAL
## PURCHASE ORDER

**Order No.** 16338  
**Vendor ID** QUIN84  
**Date** 4/1/2021  
**Page** 1

**VENDOR**

**QUIN Company**  
P.O. Box 849665  
Los Angeles, CA 90084-9665

**SHIP TO**

South Orange County Wastewater Authority  
34166 Del Obispo Street  
Dana Point, CA 92629

Attention: Donald.Michaelson@quinnpower.com  
Phone: (562) 463-4040  
Fax: (562) 463-7134  
E-mail: quinnpartscoll@quinncompany.com

Attention: Please reference requisitioner name on packing slip.  
Phone: (949) 234-5400  
Fax: (949) 489-0130

---

<table>
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<tr>
<th>Line No.</th>
<th>Description</th>
<th>Product ID</th>
<th>Vendor Part Number</th>
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<th>Unit Price</th>
<th>Quantity</th>
<th>Extended Price</th>
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<td>15-5050-01-00-00</td>
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<td>EACH</td>
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**Total** $3,256.71

---

Authorized Signature: [Signature]

4 - 1 - 2021
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<th>CUSTOMER NO.</th>
<th>QUOTE NO.</th>
<th>DATE</th>
<th>CONTACT</th>
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<tr>
<td>832781K</td>
<td>96546</td>
<td>3/16/2021</td>
<td>PHIL PETER</td>
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<table>
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<tr>
<th>PHONE NO.</th>
<th>FAX NO.</th>
<th>EMAIL</th>
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<tr>
<td>949.234.5448</td>
<td></td>
<td><a href="mailto:ppeter@socwa.com">ppeter@socwa.com</a></td>
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<table>
<thead>
<tr>
<th>MODEL</th>
<th>MAKE</th>
<th>SERIAL NO.</th>
<th>UNIT NO.</th>
<th>WO NO.</th>
<th>P.O. NO.</th>
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<tbody>
<tr>
<td>D399</td>
<td>CAT</td>
<td></td>
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</tbody>
</table>

PM2 ANNUAL SERVICE ON CAT D399 GENSET – COASTAL TREATMENT PLANT

SEGMENT: 01

PM LEVEL 2 ANNUAL SERVICE AND MULTIPoint INSPECTION

- Comprehensive detailed inspection of units is performed.
- Change crankcase oil, oil filter(s), fuel filter(s), water separator(s) as equipped.
- Replace air filter elements (optional).
- Check primary source fuel tank for water with water finding paste.
- Check day tank, fuel tank, fuel line fittings for leaks.
- Check cooling system hoses, caps, clamps for brittleness, leaks, cracks and weakness.
- Check battery voltages, charging rates, fluids, and specific gravities / ICV's.
- Engine cranking batteries will be tested under start up load for voltage drop.
- Block heater elements and inlet/outlet T-stats are checked for proper output and operation.
- Engine fan drive and belts are inspected and adjusted for proper tension and condition.
INSPECT FOR LOOSE, BROKEN OR BADLY WORN PARTS.

CHECK TURBO CHARGER ROTATION / END PLAY IF SO EQUIPPED.

CHECK GENERATOR BRUSHES FOR PROPER TENSION/SETTING AS EQUIPPED.

CHECK AND DOCUMENT CONTROL PANEL INSTRUMENTS FOR PROPER OPERATION

GREASE BEARINGS, FAN SHAFTS, LINKAGES, AND EQUIPMENT FITTINGS AS REQUIRED.

HOT OIL SAMPLE TAKEN AND SUBMITTED FOR LAB ANALYSIS.

COOLANT SAMPLE TAKEN AND SUBMITTED FOR LAB ANALYSIS

RUN UNIT UNDER LOAD FOR UP TO 15 MINUTES WHEN AUTHORIZED BY SITE AUTHORITY.

SUBMIT REPORT TO CUSTOMER.

<table>
<thead>
<tr>
<th>Parts</th>
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<th>Ext Price</th>
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Total Estimated Parts: 1,781.71

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<tr>
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<tr>
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<table>
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<th>Misc</th>
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Total Estimated Misc: 75.00

Segment 01 Total: 3,255.71

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY 98546 - 1
SUB TOTAL (BEFORE TAXES) 3,256.71

THIS ESTIMATE IS BASED ON LABOR RATES, PARTS PRICES, AND CONDITION OF THE MACHINE EXISTING ON THE DATE OF THE ESTIMATE INDICATED ABOVE. THE CUSTOMER WILL BE INFORMED OF ANY REVISIONS IN LABOR RATES, PARTS PRICES OR ADDITIONAL WORK REQUIRED BEFORE THE WORK IS STARTED. UNLESS OTHERWISE SPECIFIED, THIS ESTIMATE DOES NOT INCLUDE TRAVEL TIME AND MILEAGE, FREIGHT, SHIPPING CHARGES, ENVIRONMENTAL FEE OR TAXES WHERE APPLICABLE. THIS ESTIMATE IS EFFECTIVE FOR 30 DAYS FROM THE DATE INDICATED ABOVE.

My Signature below indicates I have read, understand and agree with the attached terms and conditions.

Issued PO#: ______________________  Authorized Name ____________________________ Please Print

Date __/__/____   ____________________________ (Signature)
Prepared by: Donald Michaelson    Phone: (949) 433-0729  Email: Donald.Michaelson@quinnpower.com  Fax:

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY  96546 - 1
Quinn Service Repair Terms and Conditions

1. Acceptance of Order.
This Service Repair Estimate is for Customer's information only and is not a valid estimate for services unless signed by an authorized representative of Customer in the place provided on the face of this Service Repair Estimate. Prices, schedules and the scope of work on this Service Repair Estimate are subject to change at Quinn's discretion.

2. Changes In Service Work.
Customer may request changes in its requirements for service repairs. Such changes will require a separate Service Repair Estimate signed by an authorized representative of Customer.

3. Termination Of Service Work.
Any order accepted by Customer may be terminated prior to completion by Customer only upon written notice to Quinn, and payment of Quinn's termination charges which may include, but not be limited to, payment for service labor provided and parts restocking charges.

4. Liability.
Quinn's liability on any claim of any kind, including claims for negligence; or for any loss or damage arising out of or connected with the manufacture, sale, delivery, repair, installation, or use of any products covered by or furnished under any order connected with this Service Repair Estimate shall be limited to those claims arising solely from the acts of Quinn, and Quinn shall in no way be liable for any special, indirect, incidental or consequential damages, including, but not limited to, damage to property, environmental liability, or death or injuries to persons suffered or sustained by the use, servicing, operation, and/or handling of the serviced equipment, nor for any use caused or occasioned, nor for any consequential damages, lost profits, expenses, or costs resulting to Customer or any third parties by reason of any delay in delivery, defect or negligence in the performance of any services provided by Quinn in connection with the service of the equipment, nonperformance of the serviced equipment, or acts that create environmental liability, or from any other cause whatsoever, and Customer hereby specifically waives all such claims. Any claims against Quinn for shortages in shipments shall be made in writing to Quinn within five (5) days of receipt of shipment by Customer. Quinn shall not be liable for any delays in performing any services or delivering any goods in whole or in part attributable to strikes, labor disputes, lockouts, accidents, fires, delays in manufacture or in transportation, delays in delivery of component material, floods, severe weather, or Acts of God, embargoes, governmental actions, or any other cause beyond the reasonable control of Quinn. Customer agrees to indemnify, defend, and hold Quinn harmless from and against any and all claims, suits, actions, proceedings, losses, liabilities, damages, expenses, and costs including attorney's fees, arising from or in any manner connected with use or misuse of the serviced equipment, or from the lack of Customer's ongoing maintenance as required by the manufacturer, except to the extent caused by Quinn's sole negligence or intentional misconduct.

5. Taxes.
Unless expressly stated, Quinn's prices do not include sales, use, excise or similar taxes. The amount of any applicable tax shall be paid by Customer as an additional charge unless specifically included in any Service Repair Estimate accepted by Customer, or in lieu thereof, the Customer shall provide Quinn with a tax exemption certificate acceptable to the taxing authorities.

6. Terms.
Terms are cash unless credit is approved. With credit approval terms of payment are net by the 10th day of the month following invoice date. A finance charge of 1.5% per month (not to exceed the maximum allowed by law) will be charged on all past due invoices. The past due balance represents all charges unpaid on the last business day of the month following invoice date. In the event of default in the payment of any amount due, and if the account is placed in the hands of any agent or attorney for collection or legal action, Customer agrees to pay both the finance charges and the costs of collection (as permitted by laws governing these transactions). Quinn retains title to merchandise until receipt of good funds. When applicable, Quinn will invoke its repairman's lien under California Civil Code Sections 3351 and 3351a.

7. Part Used for Repairs.
Back orders will be processed as soon as available. Part number changes may be made to provide latest improved interchangeable parts. Any freight charges incurred are at customer expense. We accept parts purchased from us for return credit less applicable restocking charges policy available from the parts department. Returned parts must be in salable condition and accompanied by the original invoice receipt. We extend the parts return policy to you as a voluntary service. We reserve the right to cancel or modify all or any portions of the parts return policy without prior notice and to reject any parts the customer attempts to return.

8. Warranties.
Limited Parts Warranty: Except for Caterpillar batteries, service tools, ground engaging tools, Caterpillar tires, or non-Caterpillar parts which are covered under separate limited warranties, we warrant new Caterpillar parts sold by us to be free from defects in materials and workmanship subject to the following provisions. During the first six months after purchase of the part by the initial user, we will, as an exclusive remedy, provide a new part or a repaired part, whichever we elect, in place of any part which in our sole judgment is found to be defective in material or workmanship. Such part will be provided without charges to you during normal working hours at our place of business, provided that the defective part is returned to our place of business. Any replacement part provided under the terms of this warranty is warranted for the remainder of the warranty period applicable to the part which it replaces. Receipt of parts by you acknowledges familiarity with applicable warranties. A copy of the appropriate limited warranty for Caterpillar batteries, service tools, ground engaging tools, Caterpillar tires, or non-Caterpillar parts is available to you upon request. We shall not be responsible for any failures resulting from your abuse, misuse, neglect, or improper installation or maintenance.
Limited 90 Day Repair Work Warranty: Except for reconditioned major components and complete machine rebuilds, which are covered under separate limited warranties, we warrant repair work to be free from defects in material and workmanship for a period of 90 days from performance of such work. We will, as an exclusive remedy, redo such repair work which in our sole judgment is found to be defective in material or workmanship within the 90-day warranty period. Any work redone under the terms of this warranty is warranted only for the remainder of the warranty period. If you specifically request repair work that is contrary to our recommended practice, this warranty shall be inoperative as to such work. A copy of the appropriate limited warranty for reconditioned major components or complete machine rebuilds will be provided to you upon request. We shall not be responsible for any failures resulting from your abuse, misuse, neglect, or improper maintenance.

Disclaimer of Warranties: The foregoing limited warranties are exclusive and in lieu of all other warranties, oral or written, express or implied. Including but not limited to any warranty of merchantability or fitness for a particular purpose. Manufacturers' warranties are exclusive and in lieu of all other warranties either oral or written, express or implied, including but not limited to any warranty of merchantability or fitness for a particular purpose. Quinn is not a manufacturer and makes no warranty and shall not, under any circumstances, be liable for any indirect or special, incidental or consequential damages including but not limited to loss of production, loss of profit, loss of use or business interruption, or any other economic loss, whether arising from contract, tort, strict liability or any other theory of law. Quinn makes no warranty of merchantability or fitness for any particular use or purpose, either expressed or implied.

Voiding of Warranties: Customer is responsible for operating and maintaining equipment as specified by the manufacturer(s). Repair work warranty and manufacturers' warranties may be voided if equipment is altered in any manner before or after repair, or if the equipment is not operated or maintained in accordance with manufacturers' specifications.

The rights and obligations of the parties with respect to the transactions contemplated by Service Repair Estimate shall be governed in all respects by the laws of the State of California. The parties hereby irrevocably agree that the exclusive venue for any litigation arising in connection with the transactions specified in this Service Repair Estimate shall be in the courts located in the County of Los Angeles, California.

10. Attorneys' Fees and Costs.
In the event of any legal action, controversy, claim, or dispute between the parties involving the transactions contemplated by this Service Repair Estimate, the prevailing party shall be entitled to recover from the other party reasonable expenses, attorneys' fees, and costs.
Good morning Jeanette,

Attached is the quote from Quin CAT for our annual generator service on REQ:8855.

Thank you,
Phil