

JV 7/2/25
RV 7/31/25

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

SOUTH COAST AQMD
CLERK OF THE BOARD
2025 JUN 26 PM 1:07

PETITIONER: ENERY HOLDINGS LLC

CASE NO: 6248-3

FACILITY ID: 186899

FACILITY ADDRESS: 17171 S. Central Ave.

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

City, State, Zip: Carson, CA 90746

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

☐ INTERIM ☐ SHORT ☒ REGULAR ☒ EMERGENCY ☐ EX PARTE EMERGENCY

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

Michael Munoz, Compliance

Zip

☎ (406) 544-3326 Ext.

Fax ()

E-mail mmunoz@ches.biz

Zip

☎ () Ext.

Fax ()

E-mail

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)

Enery's inability to transmit its emissions data to South Coast Air Quality Management is based on the theft of AT&T copper telephone wire. This is a Los Angeles citywide issue. Please see LA Times Appendix 1- 5-6-2025 LA Times Copper thieves cut phone service

Enery filed a service ticket with AT&T on 4/3/2025 after power was restored to the ICEGEN power plant after a planned March 2025 outage. AT&T assigned ticket PG49S831 to the issue. AT&T reported that the issue would be resolved the first week of June 2025 as the trouble affected thousands of parties. Enery followed up with AT&T 4/4/2025, 4/9/2025, 4/10/2025, 4/11/2025, 4/14/2025, 4/16/2025, 4/18/2025, 4/21/2025, 4/22/2025, 4/24/2025, 4/30/2025, 6/12/2025, 6/17/2025, 6/19/2025, 6/20/2025, and 6/24/2025. Please See Appendix 2-6-25-2025 AT&T Ticket PG49S931- CEMS Modem. After the last follow up on 6/24/2025 Enery concluded that AT&T could not accurately predict a restoration of CEMS modem line service. This led us to believe that Enery was imminently in danger of violating Rule 2012 (c)(3)(A) as we are scheduled to run a RATA and Linearity test in the second week of July and may be dispatched by the CAISO prior to that date.

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

Enery Holdings is a Federal Energy Regulatory Commission (FERC) regulated Public Utility with an identification number of GID0002712. Enery Holdings LLC has a Wholesale Generator Agreement (EG23-51-000) on file at FERC. Enery Holdings owns the ICEGEN power plant, located at 17171 Central Ave., Carson, CA 90746. The ICEGEN power plant is a 55.765 MW combined cycle power plant built in 1989. The ICEGEN power plant is a peaker power plant, providing electrical power to the California electrical grid when ordered to do so by the California Independent System Operator (CAISO). The CAISO manages roughly 80% of California's electrical grid. Failure to execute an order to generate electricity when ordered to do so by the CAISO may result in civil and criminal penalties. ICEGEN is regulated by 22 local, state and federal entities. One of these regulating entities is the South Coast Air Quality Management District (SCAQMD). SCAQMD regulates ICEGEN's nitrous oxide emissions.

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)*
45.765 MW Natural Gas Turbine	186899	D19	

*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 ICEGEN power plant produces electricity by combusting natural gas in a 45.765 MW General Electric LM6000 gas turbine. The 45.765 MW General Electric LM6000 gas turbine is the single piece of equipment that

drives the generation of electricity at ICEGEN. Without the LM6000 D19 gas turbine, ICEGEN cannot fulfill the dispatch orders of the CAISO and generate electricity for the California electrical grid. Failure to generate electricity to a CAISO order is a violation of the CAISO FERC Tariff and constitutes a violation of the Fair Powers Act, a federal law governing utilities in the United States. Enery is a FERC regulated Public Utility and is subject to civil and criminal penalties for failing to generate when ordered to do so.

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

If yes, how often: Daily, Weekly, Monthly, Semi-Annually, Annually

Date of last maintenance and/or inspection 6/26/2025

Describe the maintenance and/or inspection that was performed.

Each morning the on shift power plant Operator checks the CEMS modem line for tone. Every evening the on shift power plant Operator checks the CEMS modem line for tone. A project manager regularly checks the AT&T service ticket status.

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
Rule 2012 (c)(3)(A)	ICEGEN does not have modem connectivity to transmit daily CEMS data to the AQMD PDN communication line

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
6248-2	12/18/2024	Pending RATA	Inability to conduct RATA

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.

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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.

SCAQMD's Rule 2012 only allows a single method to transfer data from a RECLAIM facility to AQMD's Private Data Network (PDN) system. That single method is the unsecure, antiquated and problematic copper line modem interface abandoned by most businesses 20 years ago. AQMD has chosen not to modernize its data systems away from copper line modems. Upon information and belief, the U.S. Environmental Protection Agency has communicated its desire for SCAQMD to modernize its data interface away from copper line modems. AQMD has failed to upgrade to modern technology.

AT&T provides copper line modem service to Enery's ICEGEN power plant. The copper lines run underground through a manhole system. In March 2025 copper thieves cut miles and miles of subterranean copper line. This theft was reported on 5/5/2025 in the Los Angeles Times in the article "Copper thieves cut phone service to seniors in South L.A.". Appendix 1.

Despite constant pressure on AT&T, they have been unable to repair the service over the last two and half months. AT&T reports that there are few technicians who understand the old copper system, as most systems are now fiber optic. AT&T reports that there are limited repair resources as most systems are now fiber optic. AT&T reports that there are limited field maps showing the copper wires that have been in place since the 1950's.

Enery has asked SCAQMD to accept our data in an AQMD approved database form transmitted digitally. AQMD Enforcement inspector Thomas Lee (tlee2@aqmd.gov) said "Per our rules, the data can only be transmitted through the RTU/modem system to the District Central Station".

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).

Currently, Enery's ICEGEN facility is in compliance with all RECLAIM rules as we have maintained flanged gas lines and non operational status pursuant to Rule 2012 (c)(2)(D) & 2012 (c)(2)(E).

However, in support of Variance 6248-2, Enery has scheduled a RATA test for 7/15/2025. Prior to the RATA test, we must run the plant for a linearity test. That means that the ICEGEN power plant will leave its safe harbor afforded by Rule 2012 (c)(2)(D) & 2012 (c)(2)(E). Since Enery's ICEGEN power plant will not be able to transmit its CEMS data within 24 hours of emissions due the to modem line being inoperable, ICEGEN will be subject to Missing Data Procedures. The MDP Rules will cause Enery to be subject to AQMD calculated emissions for each hour of the 24 hours in a day, and each day that Enery cannot transfer its CEMS data through AQMD's antiquated PDM modem system. These MDP calculated emissions occur regardless of whether Enery can show that the gas turbine was not operating 24 hours a day.

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

Enery has followed up with AT&T on the schedule listed in question Question 4.

Enery has asked SCAQMD enforcement (Thomas Lee) if there is an alternative method of providing CEMS data to SCAQMD. Mr. Lee told Enery "Per our rules, the data can only be transmitted through the RTU/modem system to the District Central Station".

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: \$1,656,000 - (92 days*24 hours/day*30lbs/hour*\$25/lbs Cycle 1 Coastal Credit) _____

Number of employees laid off (if any): 5 _____

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

As described in our answer to Question 5, Enery is a FERC regulated public utility. Enery's ICEGEN power plant must fulfill the dispatch orders of the CAISO and generate electricity for the California electrical grid. Failure to generate electricity to a CAISO order is a violation of the CAISO FERC Tariff and constitutes a violation of the Fair Powers Act, a federal law governing utilities in the United States. Enery is a FERC regulated Public Utility and is subject to civil and criminal penalties for failing to generate when ordered to do so.

By generating power to comply with a CAISO run order, Enery will be subject to AQMD Enforcement's use of Missing Data Procedures as it will be unable to transmit its emissions data within 24 hours. Enery will view these MDP actions as a violation of its rights:

Abrogate right of Due Process under the California and United States Of America Constitutions- AQMD will violated Enery's rights by taking Enery's NOx credits without Due Process.

Violate the Takings Clause of the Constitution of the United States Of America- AQMD will violated Enery's rights by taking Enery's NOx credits without just compensation.

Violate Enery's rights under the Excessive Fines Clause of the California Constitution- The functionality of AQMD's analogue modem PDN system and the AT&T copper wires that support it are outside of the control of Enery, the permit holder. As such, any fines accruing from the unavailability of AQMD's antiquated analogue PDN system is a violation of the "Excessive Fines" clause of the California Constitution. Specifically, AQMD has made no provision for an alternative method of data delivery. Further, the application of MDP that equates untimely data = missing data and seeks to quadruple actual emissions and fines is a violation of this clause.

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

Enery's ICEGEN's power plant is under jurisdiction of the California Independent System Operator (CAISO). ICEGEN must run when ordered to run or face civil and criminal penalties.

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)
NOx	0	0	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.

Enery Holdings owns two times as many NOX Credits as its typical annual emissions; See Appendix 4

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.

Enery's ICEGEN power plant will not generate excess emissions.

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.**

Enery's ICEGEN power plant will continue to operate our AQMD approved CEMS system to record our real time emissions into our AQMD approved emissions database. AQMD personnel are welcome to enter the ICEGEN power plant and review the data. Alternatively, Enery can file transfer its database weekly to AQMD via File Transfer Protocol, File sharing on Microsoft Onedrive, or Dropbox.

Any missing data procedure implemented as a result of this situation is a violation of Enery's rights under the California Constitution and the United States Constitution and will be contested through all channels, state and federal.

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.

It is not possible for Enery to comply with the Rules and/or permit conditions. Compliance with Rule 2012 requires that Enery's ICEGEN power plant has access to a copper modem line. As explained above, this capability is outside the control of Enery.

24. State the date you are requesting the variance to begin: 7/1/2025 _____; and the date by which you expect to achieve final compliance: 11/1/2025 _____.

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

List Increments of Progress here:

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.

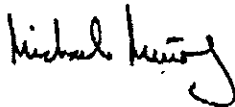
Thomas Lee (tlee2@aqmd.gov) _____ Ext. (909) 396-2412
_____ Ext. _____

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

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

Executed on 6/26/2025, at Humacao, Puerto Rico



Signature

Michael Munoz
Print Name

Title: Compliance

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

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].

English	"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."
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 بكاتب 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	"Ռեկվիրոյթյան մասնակցելու համար, եթե թարգմանչի կարիքն ունենաք, նախքան ձեր ունկնդրութիւնը, ամենաքիչն հինգ (5) օրացույցային օրից առաջ կապուեք համաձայնիքի քարտուղարի հետ, 909-396-2500 հեռախոսահամարով կամ էլեկոն՝ նամակով հետևյալ հասցեով clerkofboard@aqmd.gov ։ Նշեք գործի անունն և համարը, ունկնդրութեան թվականը, 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 중인들이 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 โปรดติดต่อเจ้าหน้าที่ล่วงหน้าอย่างน้อย 5 วันก่อนวันขึ้นศาล โดยติดต่อที่เบอร์โทร 909-396-2500 หรือโดย e-mail ที่ clerkofboard@aqmd.gov ให้นำชื่อและหมายเลขของคดี พร้อมทั้งวันเวลาในการขึ้นศาล และระบุภาษาที่คุณต้องการล่าม



CALIFORNIA

Copper thieves cut phone service to seniors in South L.A.



Copper wire is displayed after a bust led to the arrests of 82 people and seizure of 2,000 pounds of copper by the LAPD in July 2024. (Michael Blackshire / Los Angeles Times)

By Jasmine Mendez

May 5, 2025 6:31 PM PT

South Los Angeles resident Shonte Dudley could not get a hold of her mother, Mable Bush, using the 92-year-old's usual phone for several months.

Bush, who lives in South L.A. near the Inglewood border, has kept the same number with AT&T for nearly 50 years. But sometime in September 2024, her landline stopped

working. Dudley, 52, called the company, which told her someone had stolen the copper wire from the landline cables.

Service was recently restored, but Bush's family spent months worrying as both the landline — which is hooked to the woman's life alert service — and, at times, home cameras that they used to monitor movement inside the home were down.

For eight months, Dudley spoke with her mother through a caregiver's cellphone.

She said this was not the first time services had been down.

"Its been on again, off again," Dudley said. "If the phone and cameras are down, we have no way to communicate with Mommy. We have had this problem before, but it was never this long."



CALIFORNIA

Copper thieves leave 6th Street Bridge — the 'Ribbon of Light' — completely in the dark

June 13, 2024

Dudley, who reached out to ABC7's On Your Side, said the reporter called the company on her behalf. A technician arrived at her mother's home the next day and, in a few hours, fixed the landline cables.

Dudley — who says her landline and neighborhood streetlights also have been out periodically due to copper wire theft — believes it is only a matter of time before the issue resurfaces for her mom.

"My mom's neighbor who lives across the street, her phone was out too. I have several people from my church that are in Compton and South Los Angeles with their phones out," Dudley said.

Cora Brown, 72, told The Times her landline had been down since September 2024. Brown, who lives with her husband in South L.A. near Compton, stopped paying the phone bill about three months ago after their landline stopped working due to a copper wire theft.

“I don’t even remember how many times I called AT&T. I’ve called and called and called and called,” Brown said. The last few times, she said, she got no answer. “And they still send the bill.”

Brown received a bill for \$537.38 on May 3.

“I’m sick of them,” Brown said. “I’m considering switching.”

Dudley said the bills also piled up while her mother’s landline was down. Bush was on auto pay for a time, paying \$124 a month for the inoperable landline. Dudley took her mother off auto pay and said AT&T sent gift cards to compensate for overpayment.

An AT&T spokesperson said the company had seen a recent increase in copper wire theft across South L.A., a neighborhood with almost 300,000 residents, according to the Department of City Planning in 2021. AT&T’s outage website reports multiple landlines down in L.A. due to cable damage, with some missing a scheduled repair date.

“Theft and vandalism of critical communications infrastructure are serious matters that disrupt essential services for our customers, public safety and the community at large. This is a growing problem in the area, and we’re working closely with public safety on our shared interest to combat copper theft in Los Angeles,” AT&T said in a statement. “We understand how frustrating copper theft is to our customers and it’s not an acceptable customer experience. We apologize for the inconvenience.”

In 2024, the L.A. City Council created a task force in partnership with the Los Angeles Police Department and the Bureau of Street Lighting to curb copper wire theft from

public utilities. A total of 82 people were arrested, and more than 2,000 pounds of stolen copper wire were recovered.

Prior to the task force, the neighborhoods of Boyle Heights, Lincoln Heights and El Sereno saw their streetlights stripped of copper wire, leaving multiple blocks in the dark. City politicians estimated the repair costs to exceed \$17 million.

Copper wire, the spokesperson said, is costly and difficult to source.

“In South Los Angeles, copper theft is a big issue,” he said. “To those that are affected, we offer our AT&T phone advanced product that relies on our wireless network or a broadband connection.”

AT&T’s fiber-optic network, which is installed underground, uses thin, bundled glass fibers to provide internet service via light waves, according to AT&T.

Verizon’s Frontier network offered Hacienda Heights residents a similar fiber-optic service after copper wire thieves tampered with their landlines last year.

Customers like Dudley say they are not interested in wireless technology.

“There have been suggestions, like installing cameras to find who is stealing the copper, that people have come up with,” Dudley said. “It doesn’t seem like AT&T is trying to come up with a solution because they want to get rid of landline phones. So, they keep raising the price and dragging their feet about making repairs.”

Regina Costa, telecom policy director for the Utility Reform Network, a consumer advocacy organization focused on California utility services, echoed Dudley’s sentiment.

“People do want landlines,” Costa said. “It’s ridiculous to think it would take customers that long for a service repair. But this is part of AT&T’s game plan to reduce their entire

service in California, to just target the most profitable areas.”

AT&T filed an application last year with the California Public Utilities Commission in an effort to rid itself of its obligation as a carrier of last resort. The company must provide basic phone service — which is commonly landline service — to any customer asking for it in a specific area, according to AT&T. The commission rejected the request.

“The commission is looking to change the rules for carriers of last resort, but in the meantime, AT&T has gone to the Legislature to try to get them to do it for them,” Costa said. “They are running a bill, AB 470, that would eliminate the obligation to render these services to its customers.”

AT&T did not comment on its efforts to eliminate its landline services.



CALIFORNIA

‘Significant victory’: More than 80 arrested in copper wire theft crackdown

July 30, 2024

Costa said landlines are essential during natural disasters. As AARP reports, advancements in phones and GPS technology, as well as other factors, have improved 911 support for cellphones. But when storms or fire knock out electricity, copper-wire landlines continue to work.

“I’m out in the woods in Sonoma County, where one of the 2020 fires got within a mile from here. We know that, if the power goes out, anyone with a [smartphone] is going to lose their service unless they have a copper landline,” she said. “So, these women are like the canary in a coal mine, they are a sign of what is really going on with this company. And there are thousands of Californians that have experienced the same thing.”

For Dudley, when it comes to her mother, landline phones provide a sense of safety.

“There are people in their 80s or 90s who don’t have someone to advocate for them. With no phone service, you can only stop by and see them,” she said. “But what if that person falls in the middle of the night? What if the house catches on fire? Or a gas leak. It’s very dangerous.”

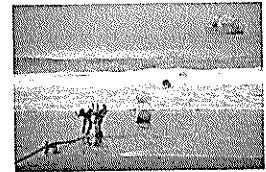
AT&T is offering up to a \$5,000 reward for specific and detailed information that leads to the arrest and conviction of copper cable thieves or the attempted sale or purchase of stolen copper cable from AT&T in the Los Angeles area, the spokesperson said. Tipsters can also call AT&T Global Security and Investigations at (800) 807-4205.

More to Read

Voices

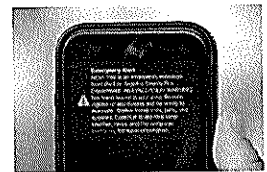
Contributor: It’s no metaphor — undersea cables hold together our precarious modern life

March 28, 2025



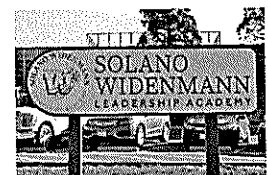
Investigation launched into L.A. County’s faulty emergency alert system

Feb. 3, 2025



Copper theft leads to power outage, school closure in Northern California

Jan. 27, 2025




Jasmine Mendez

Jasmine “Jaz” Mendez is an editorial assistant at the Los Angeles Times. She previously was a reporting intern for the Metro Desk, covering housing in Los Angeles. Mendez graduated from Cal State Northridge with a bachelor’s degree in political science and a minor in Spanish-language journalism.

Exit

Ticket status for PG49S831

Current status

 Refresh

Ticket created on: 04/03/2025 03:07 AM EDT

Pending Field Resolution

The dispatch technician requires help from a specialist. We will provide further status as it becomes available.


Incident logs


06/24/2025 04:18 PM EDT


IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE DISPATCH TECHNICIAN REQUIRES HELP FROM A SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT BECOMES AVAILABLE. | IVR CALL ID: OP0797HQUD250624201744B


06/20/2025 04:30 PM EDT


Choose actions:

 Self diagnose
Self diagnose is available once the ticket is in resolved state.

 Add log note
Provide additional log details to this ticket.
Requires PIN

 Upload/Manage files
Upload files to this ticket.
Requires PIN

 Request closure
Provide closure note to close this ticket

 Request escalation
The request escalation has errored for the following reason: ITL DataBase did not return any data.

Request chat
Automated testing on your reported issue will complete in . Test results will guide our r which may incl further networ dispatches or r identify a site issue. To update access hours, provide dispatch authorization, or verify

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
OP1333UESM250620203004B

06/19/2025 01:07 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
CP3201MYYT250619170605A

06/17/2025 12:29 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
UP0796AVUJ250617162833A

06/12/2025 05:25 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
CP3155RJJW250612212434A

power, please use Chat
while testing continues.



Manage
subscriptions
Manage contact details &
notification methods.
Requires PIN

Request/Enter PIN

In addition to event-
driven status updates,
PIN access offers
updates from our
technicians, more
detailed statuses during
referrals, customer
information requests,
and other relevant
comments. To gain PIN
authorization, click here
to contact the ticket
originator to be listed as
a subscriber.

04/30/2025 10:23 AM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
OP0793BJMY250430142247B

04/24/2025 06:36 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
OP1336QIZP250424223541B

04/24/2025 06:10 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
OP0782XKET250424221008B

04/22/2025 01:14 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT

BECOMES AVAILABLE. | IVR CALL ID:
UP0501CENX250422171356A

04/21/2025 02:57 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:5626445240 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
CP3166WDDS250421185634A

04/18/2025 01:50 PM EDT

WE HAVE DETERMINED THAT A FIELD DISPATCH IS
REQUIRED. ADDITIONAL RESOURCES WILL BE ASSIGNED
TO ASSIST IN RESTORATION EFFORTS.

04/18/2025 01:45 PM EDT

WE HAVE DETERMINED THAT A FIELD DISPATCH IS
REQUIRED. ADDITIONAL RESOURCES WILL BE ASSIGNED
TO ASSIST IN RESTORATION EFFORTS.

04/18/2025 01:09 PM EDT

A TECHNICIAN IS NOW DISPATCHED INTO OUR NETWORK
TO FURTHER ISOLATE THE PROBLEM AFFECTING YOUR
SERVICE. ACCESS TO THE CUSTOMER'S PREMISES IS NOT
ALWAYS REQUIRED. THE DISPATCHED TECHNICIAN WILL
CALL THE LOCAL CONTACT TO ARRANGE FOR ACCESS IF
REQUIRED.

04/16/2025 11:06 AM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
UP0504GPGJ250416150545A

04/16/2025 11:02 AM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
OP1335BKZK250416150118B

04/14/2025 10:12 AM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
CP3206BKZK250414141147A

04/11/2025 02:15 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
UP0505ULHD250411181358A

04/10/2025 09:39 AM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
OP1327MNIB250410133813B

04/09/2025 03:53 PM EDT

CUSTOMER CHANGED REPORTED BY PHONE FROM
5626445240 TO 4243010757

04/09/2025 03:51 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300097 | MESSAGE VERBIAGE: THE
DISPATCH TECHNICIAN REQUIRES HELP FROM A
SPECIALIST. WE WILL PROVIDE FURTHER STATUS AS IT
BECOMES AVAILABLE. | IVR CALL ID:
UP0499LYMQ250409195025A

04/09/2025 01:06 PM EDT

IVR1: | INBOUND CALL TO IVR STATUS | CALLER'S
ANI:3106359835 | TICKET NUMBER:WPSPG49S831 | IVR
MESSAGE ID: 300004 | MESSAGE VERBIAGE: WE HAVE
DETECTED A TROUBLE IN THE FIELD AND A TECHNICIAN
HAS BEEN DISPATCHED. THE TECHNICIAN MAY STOP AT
POINTS BETWEEN OUR CENTRAL OFFICE AND
CUSTOMER'S LOCATION TO TEST YOUR SERVICE. WE
DON'T ALWAYS NEED ACCESS TO THE SERVICE
LOCATION. IF NEEDED, THE TECHNICIAN

04/09/2025 01:06 PM EDT

WILL CALL THE LOCAL CONTACT TO ARRANGE ACCESS. |
IVR CALL ID: CP3155QZRL250409170515A

04/09/2025 11:07 AM EDT

A TECHNICIAN IS NOW DISPATCHED INTO OUR NETWORK TO FURTHER ISOLATE THE PROBLEM AFFECTING YOUR SERVICE. ACCESS TO THE CUSTOMER'S PREMISES IS NOT ALWAYS REQUIRED. THE DISPATCHED TECHNICIAN WILL CALL THE LOCAL CONTACT TO ARRANGE FOR ACCESS IF REQUIRED.

04/04/2025 01:21 PM EDT

A TECHNICIAN IS NOW DISPATCHED INTO OUR NETWORK TO FURTHER ISOLATE THE PROBLEM AFFECTING YOUR SERVICE. ACCESS TO THE CUSTOMER'S PREMISES IS NOT ALWAYS REQUIRED. THE DISPATCHED TECHNICIAN WILL CALL THE LOCAL CONTACT TO ARRANGE FOR ACCESS IF REQUIRED.

04/03/2025 07:16 PM EDT

OUR DISPATCHED TECHNICIAN HAS COMPLETED THE REFERRAL FOR FIELD ASSISTANCE. WE WILL REVIEW AND TAKE THE NEXT APPROPRIATE ACTION.

04/03/2025 07:10 PM EDT

WE HAVE DETERMINED THAT A FIELD DISPATCH IS REQUIRED. ADDITIONAL RESOURCES WILL BE ASSIGNED TO ASSIST IN RESTORATION EFFORTS.

04/03/2025 06:51 PM EDT

OUR TECHNICIAN HAS COMPLETED THE REFERRAL FOR CENTRAL OFFICE ASSISTANCE. WE WILL REVIEW AND TAKE THE NEXT APPROPRIATE ACTION.

04/03/2025 06:32 PM EDT

WE HAVE ASSIGNED A TECHNICIAN TO ASSIST FROM OUR CENTRAL OFFICE.

04/03/2025 06:28 PM EDT

WE HAVE DETERMINED THAT ASSISTANCE IS NEEDED FROM OUR CENTRAL OFFICE. ADDITIONAL RESOURCES WILL BE ASSIGNED TO ASSIST IN RESTORATION EFFORTS.

04/03/2025 06:15 PM EDT

OUR TECHNICIAN HAS COMPLETED THE REFERRAL FOR CENTRAL OFFICE ASSISTANCE. WE WILL REVIEW AND TAKE THE NEXT APPROPRIATE ACTION.

04/03/2025 05:40 PM EDT

WE HAVE ASSIGNED A TECHNICIAN TO ASSIST FROM OUR CENTRAL OFFICE.

04/03/2025 05:37 PM EDT

WE HAVE DETERMINED THAT ASSISTANCE IS NEEDED FROM OUR CENTRAL OFFICE. ADDITIONAL RESOURCES WILL BE ASSIGNED TO ASSIST IN RESTORATION EFFORTS.

04/03/2025 05:18 PM EDT

OUR TECHNICIAN HAS COMPLETED THE REFERRAL FOR CENTRAL OFFICE ASSISTANCE. WE WILL REVIEW AND TAKE THE NEXT APPROPRIATE ACTION.

04/03/2025 05:00 PM EDT

WE HAVE ASSIGNED A TECHNICIAN TO ASSIST FROM OUR CENTRAL OFFICE.

04/03/2025 04:57 PM EDT

WE HAVE DETERMINED THAT ASSISTANCE IS NEEDED FROM OUR CENTRAL OFFICE. ADDITIONAL RESOURCES WILL BE ASSIGNED TO ASSIST IN RESTORATION EFFORTS.

04/03/2025 04:04 PM EDT

A TECHNICIAN IS NOW DISPATCHED INTO OUR NETWORK TO FURTHER ISOLATE THE PROBLEM AFFECTING YOUR SERVICE. ACCESS TO THE CUSTOMER'S PREMISES IS NOT ALWAYS REQUIRED. THE DISPATCHED TECHNICIAN WILL CALL THE LOCAL CONTACT TO ARRANGE FOR ACCESS IF REQUIRED.

04/03/2025 03:12 PM EDT

WE HAVE DETERMINED THAT A FIELD DISPATCH IS REQUIRED. ADDITIONAL RESOURCES WILL BE ASSIGNED TO ASSIST IN RESTORATION EFFORTS.

04/03/2025 03:07 PM EDT

AT&T HAS RECEIVED LOG NOTES FROM EXPRESS
TICKETING CUSTOMER. FOR SECURITY REASONS THOSE
LOG NOTES ARE NOT RE-DISPLAYED.

04/03/2025 03:07 PM EDT

AT&T HAS RECEIVED LOG NOTES FROM EXPRESS
TICKETING CUSTOMER. FOR SECURITY REASONS THOSE
LOG NOTES ARE NOT RE-DISPLAYED.

04/03/2025 03:07 PM EDT

AT&T HAS RECEIVED A TROUBLE REPORT ON THIS
CIRCUIT. WE WILL INVESTIGATE AND PROVIDE FURTHER
STATUS AS IT BECOMES AVAILABLE.

[See less](#)



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P 79477

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month	Day	Year
01	01	2023

12/20/24

Facility Name ENERGY HOLDINGS LLC / LGHTHP - G - ICEGEN		Facility ID# 186899	Sector LF
Location Address 17171 SOUTH CENTRAL AVENUE		City CARSON	Zip 90746
Mailing Address 17171 SOUTH CENTRAL AVENUE		City CARSON	Zip 90746

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	2004 (e)			FAILURE OF FACILITY PERMIT HOLDER TO SUBMIT ACCURATE QCEPs
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	2004 (b)(4)			FAILURE OF FACILITY PERMIT HOLDER TO SUBMIT APEP REPORT WITH ACCURATE EMISSIONS.
3	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	2012 (c)(3) (A)			- FAILURE OF FACILITY PERMIT HOLDER OF A NOX MAJOR SOURCE TO TRANSMIT TOTAL DAILY NOX _x EMISSIONS AND DAILY STATUS CODES BY 5:00PM OF THE FOLLOWING DAY
4	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				- FAILURE OF FACILITY PERMIT HOLDER OF A NOX MAJOR SOURCE TO APPLY MDP IN REPORTING DAILY EMISSIONS WHEN REPORT IS LATE.
5	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	2012 (g)(8)			- FAILURE TO CALCULATE PERP NOX EMISSIONS USING ACCEPTABLE METHOD. FAILURE TO ELECTRONICALLY REPORT QUARTERLY PERP NOX _x EMISSIONS USING THE SECOND IDENTIFIER "NWF" AND AGGREGATE QUARTERLY PERP NOX _x MASS EMISSIONS USING SECOND IDENTIFIER "NUG"

Served To MICHAEL MUNOZ	Phone (406) 544-3326	Served By AVELINO REVILLA	Date Noted Served 12/20/2024
Title PRESIDENT	Email MMUNOZ@CHEZ.OIE	Phone No. <input checked="" type="checkbox"/> 909-396-2577 <input type="checkbox"/> 310-233-	Email arevilla@aqmd.gov

*Key to Authority Abbreviations

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service

☐ In Person

☒ Certified Mail

ORIGINAL



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

December 26, 2024

MICHAEL MUNOZ
PRESIDENT
ENERGY HOLDINGS LLC/LGHThP_6_ICEGEN (ID: 186899)
P.O. BOX 254
DAYTON MT, 59914

Dear MICHAEL MUNOZ:

Enclosed is your re-issued Facility Permit for Compliance Year 2025 (January 1, 2025 – December 31, 2025). This reissuance is an Administrative Permit Revision to your RECLAIM/Title V Facility Permit and includes the Title Page, Table of Contents, and Section B (RECLAIM Annual Emission Allocations) in accordance with Rule 2002(b)(4).

Please review the enclosed Section B carefully, as it will be part of your official Facility Permit. The changes are stated below. Please note that the South Coast Air Quality Management District (South Coast AQMD) rules allow you to appeal the terms and conditions of any section(s) of the enclosed Facility Permit by petitioning the Hearing Board within thirty days of receipt of the permit.

We recently sent you an invoice for the annual operating renewal fee for your facility permit. This must be paid on or before the due date indicated on the invoice or your facility permit will expire due to non-payment of fees.

A. Facility Permit

The enclosed Facility Permit contains changes described as follows:

1. The revision numbers and dates of the Title Page and the Table of Contents have been updated to reflect the reissuance of the relevant permit sections.
2. Section B – RECLAIM Annual Emission Allocation

Section B has been updated to reflect all approved RECLAIM Trading Credit (RTC) transactions approved as of December 16, 2024. Therefore, if you have submitted any RTC transactions in December, please review your records carefully to ensure that you take into account any RTC transactions that have not been approved as of that date and make necessary changes to your facility's RTC balances when reconciling your facility's emissions.

In addition, the South Coast AQMD has updated Section B of the Facility Permit to list your facility's allocation balances for the next fifteen years pursuant to Rule

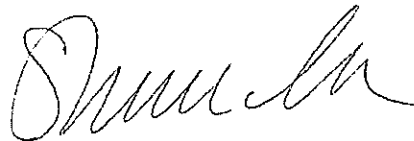
2002(b)(4). Also, your facility's Starting Allocation and Non-Tradable RTCs in Compliance Year 1994 are listed within this section. This establishes the level used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) – Trading Zone Restrictions.

B. Appeals

As previously mentioned, if you determine that certain changes or clarifications need to be made to the enclosed permit, you may appeal the terms and conditions by petitioning the Hearing Board within thirty days of receipt. If you determine there are administrative errors in these permit sections, please notify South Coast AQMD staff within thirty days of receipt of your permit sections. Your facility is still bound by the requirements of your entire Facility Permit while your appeal is under consideration by South Coast AQMD staff and/or Hearing Board.

Any comments or questions regarding your RECLAIM/Title V Facility Permit may be directed to Li Chen, Supervising Air Quality Engineer at (909) 396-2426 or lchen@aqmd.gov.

Sincerely,



Shannon. Lee, P.E.
Senior Air Quality Engineering Manager
Engineering and Permitting
Mechanical/Chemical/Energy/Terminals

Enclosure

cc: Gerardo Rios, U.S. EPA (via cdx.epa.gov)
Kevin Orellana, Sr. Enforcement Manager – Compliance



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

Title Page
Facility ID: 186899
Revision #: 7
Date: January 01, 2025

FACILITY PERMIT TO OPERATE

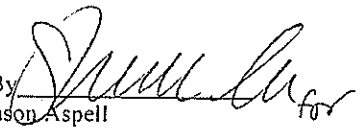
ENERGY HOLDINGS LLC/LGHHP 6 ICEGEN
17171 S CENTRAL AVE -
CARSON, CA 90746

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

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 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Wayne Natri
Executive Officer

By 
Jason Aspell
Deputy Executive Officer
Engineering and Permitting



**FACILITY PERMIT TO OPERATE
ENERGY HOLDINGS LLC/LGHTHP_6_ICEGEN**

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FACILITY PERMIT TO OPERATE ENERGY HOLDINGS LLC/LGHTHP_6_ICEGEN

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NO _x RTC Initially Allocated	NO _x RTC ¹ Holding as of 01/01/2025 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2022 6/2023	Coastal	0	0	0
1/2023 12/2023	Coastal	75314	0	0
7/2023 6/2024	Coastal	0	555	0
1/2024 12/2024	Coastal	75314	-3934	0
7/2024 6/2025	Coastal	0	2500	0
1/2025 12/2025	Coastal	75314	-1961	0
7/2025 6/2026	Coastal	0	2500	0
1/2026 12/2026	Coastal	75314	2350	0
7/2026 6/2027	Coastal	0	2500	0
1/2027 12/2027	Coastal	75314	2350	0
7/2027 6/2028	Coastal	0	2500	0
1/2028 12/2028	Coastal	75314	2350	0
7/2028 6/2029	Coastal	0	2500	0
1/2029 12/2029	Coastal	75314	2350	0
7/2029 6/2030	Coastal	0	2500	0
1/2030 12/2030	Coastal	75314	2350	0
7/2030 6/2031	Coastal	0	2500	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



FACILITY PERMIT TO OPERATE ENERGY HOLDINGS LLC/LGHTHP_6_ICEGEN

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

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RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 01/01/2025 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
1/2031 12/2031	Coastal	75314	2350	0
7/2031 6/2032	Coastal	0	2500	0
1/2032 12/2032	Coastal	75314	2350	0
7/2032 6/2033	Coastal	0	2500	0
1/2033 12/2033	Coastal	75314	2350	0
7/2033 6/2034	Coastal	0	2500	0
1/2034 12/2034	Coastal	75314	2350	0
7/2034 6/2035	Coastal	0	2500	0
1/2035 12/2035	Coastal	75314	2350	0
7/2035 6/2036	Coastal	0	2500	0
1/2036 12/2036	Coastal	75314	2350	0
7/2036 6/2037	Coastal	0	2500	0
1/2037 12/2037	Coastal	75314	2350	0
7/2037 6/2038	Coastal	0	2500	0
1/2038 12/2038	Coastal	75314	2350	0
7/2038 6/2039	Coastal	0	2500	0
1/2039 12/2039	Coastal	75314	2350	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



FACILITY PERMIT TO OPERATE ENERGY HOLDINGS LLC/LGHHP_6_ICEGEN

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NO _x RTC Initially Allocated	NO _x RTC ¹ Holding as of 01/01/2025 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2039 6/2040	Coastal	0	2500	0
1/2040 12/2040	Coastal	75314	2350	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



**FACILITY PERMIT TO OPERATE
ENERGY HOLDINGS LLC/LGHTHP_6_ICEGEN**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	NOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
1/1994	12/1994	Coastal	104220	0

Clerk of Board

From: Michael Munoz <mmunoz@ches.biz>
Sent: Thursday, June 26, 2025 12:55 PM
To: Clerk of Board
Subject: [EXTERNAL] Case 6248-3

Dear Roselinda,

Please change my request on our petition from an emergency to an interim variance.

Michael Munoz
Carson Hybrid Energy Storage
17171 Central Ave.
Carson, CA 90746
406-544-3326
701-779-9705 Conference call

