

2025 FEB 13 PM 3:40

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

PETITIONER: LOS ANGELES REGIONAL INTEROPERABLE

CASE NO: 6234-5

COMMUNICATIONS SYSTEM JOINT POWERS AUTHORITY (LA-RICS AUTHORITY)

FACILITY ID: 193436

FACILITY ADDRESS: (APN) 8675 016-307 Angeles National Forest

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

City, State, Zip: Claremont, CA 91711

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

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

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

Nancy Yang

Riad ElMasri

2525 Corporate Place, Suite 200

2525 Corporate Place, Suite 200

Monterey Park, CA. Zip 91754

Monterey Park, CA. Zip 91754

☎ (323) 371-8852 Ext.

☎ (323) 881-8183 Ext.

Fax ()

Fax ()

E-mail: nyang@isd.lacounty.gov/nancy.yang@la-rics.org E-mail riad.elmasri@la-rics.org

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

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

This petition for variance is being filed due to potential violation of Permit Condition #4 (This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year and no more than 4.2 hours in any one month for maintenance and testing purposes).

As of February 13, 2025, total calendar year-to-date runtime of the emergency generator at the LA-RICS Authority's East Sunset Ridge (ESR) facility is 177.25 hours excluding the runtime of 68.09 hours during

Southern California Edison's Public Safety Power ShutOff (PSPS), and the runtime of 20.41 hours during when Southcoast AQMD Executive Order 25-01 (as amended by 25-01(a) and 25-01(b)) suspending rules pertaining to 200-hour limit for the operation of emergency generators were in effect. Total year-to-date generator runtime inclusive of the run hours during Edison's PSPS events and SCAQMD Executive Order 25-01's effective period is 265.75 hours. Of these hours, 1.25 hours are for generator testing and maintenance.

The generator runtime to-date excluding the hours during PSPS and SCAQMD Executive Order 25-01 has not exceeded the permitted annual operating limit of 200 hours. Weekly testing and maintenance of the generator for the remainder of 2025 is estimated to be around 17 hours. Given the current year-to-date non-exempted runtime of 177.25 hours, this would result in total estimated runtime of 194.25 hours for the year which is under 200 hours. However, runtime may exceed the limit stipulated in Permit to Operate Condition #4 due to Edison's planned maintenance outages and possible unforeseen, unplanned power outages between now and the end of the calendar year.

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

The Los Angeles Regional Interoperable Communications System (LA-RICS) is a radio network dedicated entirely to emergency responders. LA-RICS' Land Mobile Radio System creates a unified web of communication, eliminates barriers to multi-jurisdictional responses and allows police, firefighters and paramedics to communicate directly with users outside of their agency.

Due to the use case of the network, it is imperative to public safety that the network stays online with power despite the recent SCE power outages or utility infrastructure impacted by the recent wildfires so first responders will be able to maintain critical communications supporting public safety operations and serving impacted communities at a time when services are most needed.

LA-RICS Authority's ESR communications site is equipped with a fixed emergency generator which will provide backup power to LA-RICS' public safety radio communications systems onsite and keep them operational when commercial utility power fails.

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)*
Emergency Generator (ICE Cummins, Model No. QSB5-G6, diesel fueled, 4-cylinders, turbocharged and aftercooled, rated at 208BHP)	625601 / G63683		

*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 emergency generator onsite provides backup power to radio equipment supporting mission-critical communication when utility power from SCE is lost.

The LA-RICS Authority is seeking variance on its emergency backup generator for the wireless communications facility operations. The ESR facility provides land mobile radio and microwave communications for emergency public safety entities making it imperative that the system stays online and the facility stays on-air during blackouts or other utility planned and unplanned power outages.

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 May 10, 2024

Describe the maintenance and/or inspection that was performed.

Visual inspection was performed on the generator including battery and charger, cooling system, controls and accessories, alternator, fuel system, intake and exhaust, engine lubrication, oil and filter, and generator operations. No issues were found except battery replacement was recommended by service technician due to age of battery, and dirty air filter was recommended for replacement. Both battery and air filter were replaced in subsequent visits before November 2024.

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
203 (b) [Condition #4 of Facility Permit to Operate #G63683]	The generator shall not be operated more than 200 hours in any one year. The emergency generator potentially may exceed the runtime stipulated in the Permit to Operate (Condition #4) in the event of utility service provider's maintenance and unforeseen power outages.

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

Case No.	Date of Action	Final Compliance Date	Explanation

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

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☐ No ☒

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

LARICS Authority operates a radio network providing mission-critical wireless communication services for public safety emergency personnel throughout Los Angeles County. The radio network is required to stay "on air" 24/7 through the year to support radio communications for the LA region's first responders for law enforcement, fire service, and emergency medical services. When commercial utility power from SCE is lost, site ESR's automatic transfer switch starts and activates the emergency generator to continue supply of electricity to maintain radio system operation until utility power can be restored. There are several SCE power outages beyond LA-RICS Authority's control that occurred which accounted for the majority of generator run time to date. Included in the attachment is a generator runtime report (see Attachment 1) that annotated the individual utility power outage that occurred this year at the ESR site.

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).

As of February 13, 2025, total calendar year-to-date runtime of the emergency generator at the LA-RICS East Sunset Ridge (ESR) facility is 177.25 hours excluding the runtime of 88.5 hours during Southern California Edison's Public Safety Power Shutoff (PSPS) and during the South Coast AQMD's Executive Order 25-01 (and as amended) that suspended the permit conditions for ICE emergency generators limiting a generator's operation to 200 hours a year pursuant to the Governor declared State of Emergency. Total year-to-date generator runtime inclusive of the hours during utility provider's PSPS event and during the SCAQMD Executive Order is 265.75 hours.

The generator runtime to-date excluding the hours during PSPS and during the SCAQMD Executive Order

has not exceeded the permitted annual operating limit of 200 hours but may exceed the permitted 200 hours due to SCE planned maintenance outages and possible unforeseen power outages until the end of the calendar year.

The generator runtime activity has been reported to SCAQMD as part of permit compliance, first to inspector Nathan Wong on February 11, 2025 when LA-RICS learned the SCE outage that started on February 5 has a potential to extend to February 14. LA-RICS also notified SCAQMD of the PSPS (under notification #827083). If the SCE outage that started on February 5 continues and if there are additional utility outages for the remainder of the year, the emergency generator runtime excluding PSPS events and when Executive Order 25-01 was in effect is anticipated to exceed 200 hours. Please refer to the attached ESR generator annotated runtime report.

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

As part of LA-RICS Authority's ongoing compliance effort, we have been actively monitoring generator runtime through our remote alarm and monitoring system which provides notification whenever utility power is lost and the automatic transfer switch transfers power to the emergency generator, and back to utility power.

In order to achieve continued compliance, we are submitting this variance application to exceed the 200 hours limit in Condition #4 of the Permit to Operate in case of continued and additional SCE planned or unplanned power outages between now and end of the calendar year. We are unable to control the utility company's outage frequency or duration and can only monitor and request updates from SCE to confirm when power can be/is restored.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$ fines and penalties due to noncompliance

Number of employees laid off (if any): N/A

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

If LA-RICS Authority is unable to operate the emergency generator during future power outages for remainder of the year, it would pose a major public safety risk. Emergency services providers/first responders rely on the LA-RICS network for wireless communication extending throughout the remote regions of Los Angeles County. The LA-RICS land mobile radio system was used extensively by first responders during the Palisades, Eaton and other recent wildfires. Losing power for the ESR site would not only hurt coverage for the localized area but would hurt system performance and reliability for the rest of the county due to critical microwave links this site provides.

If variance is not granted, the LA-RICS land mobile radio system, being a mission-critical communications system supporting first responder radio communications for daily operation and emergency responses countywide and for which it is imperative to stay "on air", would need to continue operation with backup power during utility power outages, and LA-RICS Authority would incur fines and penalties.

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

As a public safety critical operation there is no ability for the LA-RICS land mobile radio system to terminate operations. The system needs to stay online in order to provide law enforcement, fire, and emergency medical services the ability to communicate. The emergency generators is programed and setup to immediately shut down upon restoration of utility power using an automatic transfer switch.

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+NMHC (2.79 grams/bhp-hr)	30.70	0	30.70
PM (0.1 grams/bhp-hr)	1.10	0	1.10
CO (0.66 grams/bhp-hr)	7.26	0	7.26
At this time, there is no excess emission as the ESR ICE emergency generator has not yet exceeded 200 hours of operation.			

* Column A minus Column B = Column C

Excess Opacity: N/A %

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

At this time, there is no excess emission as the ESR ICE emergency generator has not yet exceeded 200 hours of operation. When the 200 hours operations are exceeded, below are the calculations that will be used to estimate quantities in No. 19.

Pollutant values converted from grams/bhp-hr to lbs/bhp-hr x 24 hours x Generator BHP

NOx+NMHC = (2.79 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 208 bhp = 30.70 lbs/day

PM = (0.1 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 208 bhp = 1.10 lbs/day

CO = (0.66 grams/bhp-hr) x (.00220462 lb/gram) x 24 hrs x 208 bhp = 7.26 lbs/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.

The LA-RICS ESR site is a critical infrastructure for public safety communications and emergency response, and the LA-RICS Authority cannot disable the power infrastructure as the LA-RICS Land Mobile Radio system needs to stay online in order to provide emergency services providers/first responders the ability to

communicate. Generators are programed and setup to immediately shut down upon restoration of utility power using an automatic transfer switch. Outside of 15-minute weekly maintenance functional testing and minor preventive maintenance work, excess emissions will drop to zero upon restoration of utility power.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Generator usage and utility power status will continue to be monitored by our alarm and monitoring system allowing for updates on total hourly usage to be supplied for any required frequency. See attached generator runtime annotated report showing the generator runtime at the LA-RICS ESR site for the year.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

LA-RICS is seeking a variance on AQMD Permit to Operate # G63683 Condition No. 4 which states that "This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year and no more than 4.2 hours in any one month for maintenance and testing purposes." Resolution to the potential violation for this limit is dependent on availability and restoration of SCE's utility power and probability of future power outages for the remainder of 2025 which LA-RICS Authority has no control over.

24. State the date you are requesting the variance to begin: February 13, 2025; and the date by which you expect to achieve final compliance: December 31, 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.

Ext. _____

Ext. _____

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

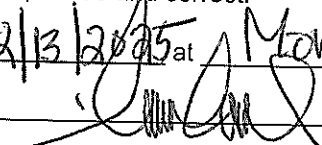
Name	Company	Title
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The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 2/13/2025 at

Monterey Park, CA

Signature



Riad ElMasri
Print Name

Title:

Project Manager



PERMIT TO OPERATE

Page 1
Permit No.
G63683
A/N 625601

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

**Legal Owner
or Operator:**

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

ID 193436

Equipment Location: APN 8675 016-307 ANGELES NATIONAL FOREST, CLAREMONT, CA 91711

Equipment Description :

Internal Combustion Engine, Cummins, Model No. QSB5-G6, Diesel-Fueled, 4-Cylinder, Turbocharged and Aftercooled, rated at 208 BHP, Driving an Emergency Electrical Generator.

Conditions :

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. An operational non-resettable totalizing timer shall be installed and maintained to indicate the engine elapsed operating time.
4. This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year and no more than 4.2 hours in any one month for maintenance and testing purposes.
5. Operating beyond the 50 hours per year allotted for maintenance and testing purposes shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the utility distribution company has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage. Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.
6. This engine shall not be used as part of a demand response program using interruptible service contract in which a facility receives a payment or reduced rates in return for reducing its electric load on the grid when requested to so by the utility or the grid operator.
7. The operator shall keep a log of engine operations documenting the total time the engine is operated each month and specific reason for operation as:
 - A. Emergency use.
 - B. Maintenance and testing.
 - C. Other (describe the reason for operating).



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PERMIT TO OPERATE

In addition, each time the engine is manually started, the log shall include the date of operation, the specific reason for operation, and the totalizing hour meter reading (in hours and tenths of hours) at the beginning and end of operation

8. On or before January 15th of each year, the operator shall record in the engine operating log the following:

- A. The total hours of operation for the previous calendar year, and
- B. The total hours of engine operation for maintenance and testing for the previous calendar year.

Engine operating log shall be retained on site for a minimum of three calendar years and shall be made available to the South Coast AQMD representative upon request.

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

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

NMHC + NOx: 3.00 g/bhp-hr
CO: 2.60 g/bhp-hr
PM: 0.15 g/bhp-hr

11. Sulfur content of diesel fuel supplied to the engine shall not exceed 15 ppm by weight.





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

PERMIT TO OPERATE

Page 3
Permit No.
G63683
A/N 625601

NOTICE

In accordance with Rule 206, this Permit to Operate or copy shall be posted on or within 8 meters of the equipment.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

Amin Dejbakhsh

BY AMIR DEJBAKSH/SB07
12/9/2020



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VARIANCE APPLICATION ATTACHMENT 1 (FOR APPLICATION QUESTION 14, 15 AND 22)

[illegible]