

1 MICHAEL R. WATERS (State Bar No. 186816)

2 **NAVFAC SOUTHWEST**

3 750 Pacific Highway, Rm. 1622

4 San Diego CA 92132

5 Telephone: Telephone: 619-306-6970

6 Facsimile: None

7 Attorney for Petitioner

8 **UNITED STATES NAVY**

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

11 In the Matter of

12 **UNITED STATES NAVY**

13 Petitioner.

Case No.: 4518-11

Facility I.D.: 2613

**DECLARATION OF JEFF
MCGOVERN IN SUPPORT OF
PETITION FOR SHORT VARIANCE**

Hearing Date: March 18, 2025

14
15 1. My name is Jeff McGovern, and I am the Environmental Program Director at Naval
16 Weapons Station Seal Beach (NWSSB). I have personal knowledge of the facts stated herein
17 and, if called as a witness, could and would testify competently thereto under oath.

18 2. I am familiar with NWSSB's Petition for Short Variance filed with the District on
19 February 21, 2025 ("Petition"), including the affected permits to operate and relevant permit
20 conditions that are described in the Petition.

21 **FACILITY AND EQUIPMENT**

22 3. Naval Weapons Station Seal Beach (NWSSB), located at 800 Seal Beach Blvd, Seal
23 Beach, CA, provides weapons storage, loading, maintenance, and assessment support to ships
24 of the United States Pacific Fleet. We also support Coast Guard vessels and Marine Corps
25 units stationed afloat and ashore. We hold 25 permits with the District and operate in
26 compliance with all applicable rules, regulations, and permit conditions. NWSSB is not a Title
27 V or RECLAIM facility.

4. Four permitted emergency engines/generator sets would be subject to the Navy's requested variance, as presented in the following table. These engines provide emergency power to buildings and infrastructure in case of a grid interruption.

Equipment/Activity	Application/ Permit No.
Stationary Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G60256
Stationary Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G75853
Stationary Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G75854
Portable Internal Combustion Engine Driving an Emergency Electrical Generator	Permit G72744

BLACK START EXERCISES

5. In April 2025, NWSSB is required to hold congressionally-mandated "Black Start Exercises" (BSE), performed as part of Navy Energy Resilience Readiness Exercise Strategy at military Installations. During a BSE, delivery of energy provided from the commercial electric grid (transmission system) is terminated and distribution lines are de-energized. Once the facility is disconnected from the commercial electric grid, the installation's electric grid is initiated, by using emergency internal combustion engines (ICEs), to ensure operability before reconnecting to the grid.

6. The Black Start process is an essential legal mandate to ensure continuity of critical loads and the readiness of critical mission operations and personnel on military installations.

PURPOSE OF THE VARIANCE

7. The Navy is applying for this variance since the four permitted ICEs that are involved in the planned BSE are subject to monthly maintenance and testing (M&T) operating limits between 4.2 and 5 hours per month, depending on the engine, and 50 hours per year for each engine, as shown in the following table. The BSE hours would be counted against the M&T limits, and since they are expected to last at least 12 hours, the monthly limits for these engines will be exceeded. The BSE would not affect Navy's compliance with the annual M&T limit. The Navy will comply with the annual limit.

Rule	Explanation
Permit G60256, Condition #4	The engine would exceed the monthly maintenance and testing limits of 4.2 hours/month when engaged in Black Start Exercises.
Permit G75853, Condition #4	The engine would exceed the monthly maintenance and testing limits of 4.2 hours/month when engaged in Black Start Exercises.
Permit G75854, Condition #4	The engine would exceed the monthly maintenance and testing limits of 4.2 hours/month when engaged in Black Start Exercises.
Permit G72744, Condition #6	The engine would exceed the monthly maintenance and testing limits of 5 hours/month when engaged in Black Start Exercises.

CIRCUMSTANCES BEYOND NWSSB'S CONTROL PREVENT COMPLIANCE WITH THE PERMIT CONDITION

8. BSE is a Congress-mandated requirement. NWSSB has no discretion in terms of whether to conduct the BSE, and no authority over the duration of the exercise, which is expected to take at least 12 hours. NWSSB will adjust the engines' regular maintenance schedule to ensure compliance with the annual M&T limit for each engine. To the maximum extent possible, the Navy will manage the number of M&T hours per month to minimize operations and emissions.

FAILURE TO OBTAIN VARIANCE RELIEF WILL AFFECT NATIONAL SECURITY READINESS EXERCISES

9. BSEs are energy resilience readiness exercises designed to test the installation's emergency and standby energy generation systems in case of grid power disruption. These exercises are legally mandated to ensure the readiness of critical mission operations and personnel on military installations, and are essential to our national security. NWSSB must comply with this Congress-mandated requirement.

CURTAILMENT AND TERMINATION

10. BSEs are required by law. The duration and extent of BSEs are outside of NWSSB's control. We will manage the regular M&T hours for all the engines involved in the BSE to remain below the annual M&T limit.

NO EXCESS EMISSIONS

11. Since the affected engines do not have a daily limit and the Navy will comply with the

1 annual M&T limit, no excess emissions are anticipated as a result of the planned BSEs.

2 **COMPLIANCE DURING VARIANCE PERIOD**

3 12. I have reviewed the proposed conditions during the variance period and NWSSB is
4 prepared to comply with all the requirements.

5 13. We will manage the engines' M&T schedule to ensure the annual limit is not exceeded.

6 14. NWSSB will return to compliance with the permit conditions at the conclusion of the
7 BSE, but no later than June 30, 2025.

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10 I declare under penalty of perjury under the laws of the State of California that
11 foregoing is true and correct to my personal knowledge.

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13 Executed this 12th day of March 2025, in the County of Orange
14 State of California.

15 MCGOVERN.JEFF.J.129621640

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17 Jeff McGovern

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