

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

In the Matter of)	Case No. 6139-10
)	Facility ID 123871
VERIZON WIRELESS,)	
)	DECLARATION OF ZACH
Petitioner.)	FEINGOLD
)	
)	
)	
)	
_____)	

I, ZACH FEINGOLD, state:

1. I am a Verizon Wireless Regional Environmental Manager at Chino Hills, California.
2. This declaration is submitted pursuant to South Coast Air Quality Management District (“District”) Hearing Board Rule 4.
3. Verizon Wireless provides cellular communications services to its customers. Verizon Wireless operates and maintains an extensive network of wireless facilities across the United States of America, including the facility located at 7625 Black Star Canyon, Corona, California, Facility ID No. 123871 (the “Sierra Peak cell tower”).
4. The Sierra Peak cell tower provides cellular telephone service throughout portions of Orange and Riverside Counties, including service used for 911 calls and other emergency communications. Continued operation of the Sierra Peak cell tower during utility outages is important to maintain communications for Verizon customers, the public, and emergency response agencies.

5. The equipment that is the subject of this variance request is an emergency internal combustion engine used to provide backup power to the Sierra Peak cell tower when commercial utility power is unavailable. The engine is identified as a General Motors 159 horsepower internal combustion engine, Model GM 8.1L, propane-fueled, and is described in South Coast AQMD Application No. 666776. The prior permit for the equipment was Permit No. F45895.

6. Permit No. F45895 includes Condition #4, which limits operation of the engine to no more than 200 hours in any one year. Petitioner understands that operation of the engine in excess of that 200-hour annual limit constitutes operation contrary to the applicable permit condition and therefore implicates District Rule 203(b).

7. Beginning February 18, 2026, the Sierra Peak facility experienced a series of Southern California Edison (SCE) power outage events. Those outages were unanticipated, occurred with little or no advance warning, and required operation of the emergency generator to keep the Sierra Peak cell tower functional during the outage events.

8. In February 2026, there were SCE outage events that resulted in the generator accumulating more than 125 hours of operation. Although those February outages caused an unexpected accumulation of operating hours early in the year, Petitioner reasonably expected to maintain compliance with the 200-hour annual operating limit. After the February outages, the generator was not operated except for testing and the operating hours remained well below the annual limit. Petitioner had no basis to know or reasonably anticipate that additional extended utility outage events would occur during the year that would cause the generator to exceed the 200-hour limit.

9. Petitioner did not operate the generator during the February outage period for ordinary business convenience, load shifting, peak shaving, or other elective non-emergency purposes. The generator was operated because commercial utility power was

unavailable and emergency backup power was needed to maintain operation of the Sierra Peak cell tower.

10. Additional unanticipated SCE outage events occurred in May 2026 without advanced warning, including an outage from May 15, 2026 through May 17, 2026. Those May outages required emergency operation of the generator to maintain the Sierra Peak cell tower while commercial utility power was unavailable.

11. The May 2026 unanticipated outage events caused the generator to exceed the 200-hour annual operating limit. As of May 17, 2026, following the May outage, the generator had accumulated approximately 201.4 hours of operation year-to-date.

12. The exceedance of the 200-hour annual operating limit was caused by unanticipated and unpredictable SCE utility outages and the need to maintain essential communications service during those outages. The February outage events reduced the available operating hours under the annual limit, and Petitioner could not know or reasonably anticipate an exceedance of that limit. The May outage events, which Petitioner did not anticipate and could not reasonably control, caused the generator to exceed the 200-hour annual operating limit.

13. Petitioner did not have sufficient time to obtain relief through the ordinary noticed variance process before the exceedance occurred. The need for relief became immediate when the unanticipated May outages lasted for days and caused the generator to exceed the annual operating limit while emergency backup power was still needed to maintain operation of the Sierra Peak cell tower.

14. Petitioner could not reasonably avoid operating the generator during the February and May 2026 SCE outages. If Petitioner had deactivated or refused to operate the emergency generator during those outages, the Sierra Peak cell tower would have lost backup power and could have been disabled, interrupting cellular service used by Verizon customers, 911 callers, and emergency response agencies.

15. Good cause exists for interim variance relief because the need for relief arose suddenly from utility outage events outside Petitioner's reasonable control that were not anticipated (nor was any notice provided by SCE), and interim relief is necessary pending the noticed hearing on Petitioner's regular variance petition.

16. During the interim variance period, Petitioner will limit operation of the generator to emergency usage and will not operate it for ordinary non-emergency purposes, load shifting, peak shaving, or elective business convenience. Petitioner will also limit maintenance and testing operation to no more than 1.0 hour per month total.

17. Petitioner will maintain records of generator operation during the interim variance period, including dates of operation, operating hours, reason for operation, and whether the operation was for emergency use or maintenance/testing. Petitioner will make such records available to South Coast AQMD upon request.

18. Petitioner estimates that any operation of the generator under the interim variance may result in the following excess emissions associated with operation beyond the 200-hour annual operating limit:

- a. NO_x: 12.61 lbs/day, based on 1.5 g/hp-hr;
- b. CO: 16.81 lbs/day, based on 2.0 g/hp-hr;
- c. VOC: 12.61 lbs/day, based on 1.5 g/hp-hr.

19. Operation under the proposed interim variance order is not expected to result in a violation of Health and Safety Code section 41700 because operation will be limited to emergency usage, maintenance and testing will be limited to no more than 1.0 hour per month total, and Petitioner will minimize operation to the extent feasible.

