

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

**SOUTH COAST AQMD
CLERK OF THE BOARDS**

PETITIONER: VERIZON WIRELESS

CASE NO: 6139-11

2026 JUL 21 P 1:55

FACILITY ID: 123865

FACILITY ADDRESS: 13910 San Sevaine Rd.

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

City, State, Zip: San Bernardino, CA 92401

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).

Chris Sinner

Zach Feingold

Verizon Wireless

Verizon Wireless

5351 E. Airport Dr

18850 Orange Street

Ontario, CA Zip 91761

Bloomington, CA Zip 92316

☎ (714) 402-6447 Ext.

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Fax ()

Fax ()

E-mail chris.sinner@verizonwireless.com

E-mail zachary.d.feingold@verizon.com

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)

The facility's emergency power generator began operating due to intermittent Southern California Edison (SCE) power failure events in order to keep the facility functional. The active permit number G78871 for the emergency generator has a 200 hours annual operating limit. The site has had several SCE power failures year to date including a power failure currently occurring on 7/17/2026 where the run time on the emergency generator has reached 196.5 hours for the year. The SCE power failure is currently ongoing as of and the site emergency generator is still operating and the emergency generator will likely exceed 200 hours on 7/17/2026.

Due to the quick accumulation of operating hours during ongoing outages, an Ex Parte Emergency Variance petition is being filed now, before Interim and Regular Variances can be approved.

Due to public dependence on wireless telecommunications during routine and emergency events, the emergency generator cannot be deactivated.

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

The Verizon Wireless "San Sevine" cell tower provides cellular telephone services throughout Orange and Riverside County areas, including 911 and other emergency services.

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)*
Kohler 103 hp internal combustion engine, Model KG6208, propane-fueled	G78871		

*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.

Emergency generators are critical to support the continual operation of Verizon Wireless's cell towers during times of emergency.

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

The generators are typically tested two times a month to verify that they will be operational in the event of an emergency.

Once per year, a third party maintenance vendor will perform a comprehensive analyses of the generators, inspecting the parts, performing diagnostic tests, and making repairs as necessary.

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
1304(a)(4) and 203(b)	"This engine shall not operate more than 200 hours in any one calendar year"

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.

As of 7/17/2026, SCE power outages have caused the emergency generator to accumulate 196.5 hours year to date and the emergency generator is still operating at the site due to the current SCE power outage.

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).

Confidence in maintained compliance through calendar year 2026 began dwindling due to the most recent SCE power failure from 7/17/2026 causing the emergency generator to reach 196.5 hours for 2026.

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

N/A

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: \$___Unknown, but significant and incalculable_____

Number of employees laid off (if any):___0_____

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

Economic losses are difficult to calculate, though the interruption of telecommunications service throughout the would impose historic costs on Verizon Wireless's customers. The public's need for cellular communications during emergency services is critical

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

No. Disabling the generator if it reaches 200 hours of operation would also disable the cell tower during utility outages – thus terminating services necessary for customer communications, contacting 911, and other emergency response agencies.

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	8.17	N/A	8.17
CO	10.89	N/A	10.89
VOC	8.17	N/A	8.17

* 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.

Emissions are calculated as worst-case scenario according to the upper limits established in the permit:

- VOC – 1.5 g/hp-hr
- NOX – 1.5 g/hp-hr
- CO – 2.0 g/hp-hr

However, these generators will not routinely operate daily. Operations will only be during utility outages and the generator's scheduled, brief test operations

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.

Verizon Wireless ensures that its generators are properly operated and maintained consistent with the manufacturer's specifications.

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.**

Emergency generator operations will continue to be recorded, with emissions calculated based upon hours of operation and the appropriate emission factors.

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.

Should non-compliance occur, a return to compliance would be achieved on 01/01/2027 when the permissible emergency generator operating hours returns to zero.

24. State the date you are requesting the variance to begin: 5/19/2026; and the date by which you expect to achieve final compliance: January 1, 2027, if necessary.

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:

N/A

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.

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 7/17/2026, at Bloomington, California

Signature Zach Feingold

Zach Feingold
Print Name

Title: Environmental Manager



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO CONSTRUCT/OPERATE

Page 1
Permit No.
G78871
A/N 656990

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.

ID 123865

Legal Owner
or Operator:

VERIZON WIRELESS, SAN SEVAINÉ
DBA: VERIZON WIRELESS/AIRTOUCH CELLULAR
15505 SAND CANYON AVE BLDG D , BLDG D-1
IRVINE, CA 92618

Equipment Location: 13910 SAN SEVAINÉ RD, SAN BERNARDINO, CA 92401

Equipment Description :

Internal Combustion Engine, Kohler, Model No. KG6208, 103 BHP, LPG Fueled, Four-Cycle, 8 Cylinders, Naturally Aspirated, Equipped with an Air-to-Fuel Ratio Controller and a Three-Way Catalytic Converter, Nett Technologies, Model No. TG Series, 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. This engine shall not be operated without the use of an air-to-fuel ratio controller which shall be properly maintained and kept in good operating condition at all times.
4. This engine shall not be operated unless its exhaust is vented to the non-selective catalytic reduction unit which shall be properly maintained and kept in good operating condition at all times.
5. This engine shall be fueled with LPG only.
6. Sulfur content of LPG supplied to this engine shall not exceed 40 ppm by volume, calculated as H₂S.
7. This engine shall not be operated more than 200 hours in any one calendar year, which includes no more than 50 hours in any one calendar year and no more 4.2 hours in any one calendar month for maintenance and testing purposes.
8. Operation of this engine beyond the 50 hours per calendar year allotted for engine maintenance and testing shall be allowed only during emergencies resulting in an interruption of service of the primary power supply or during Stage II or III electrical emergencies declared by the electrical grid operator. This engine may not be used as part of an interruptible electrical service program.
9. An operational non-resettable totalizing timer shall be installed and maintained to indicate the engine elapsed operating time.

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10. The operator shall keep a log of engine operations documenting the total time the engine is operated each calendar month and specific reason for operation, such as:
- A. Emergency use.
 - B. Maintenance and testing.
 - C. Other (describe the reason for operating).

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.

11. 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.

12. This engine shall comply with all applicable requirements of Rule 431.1, Rule 1110.2, and 40 CFR 60 Subpart JJJJ.

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

CO:	2.0 g/BHP-hr
NOx:	1.5 g/BHP-hr
VOC:	1.5 g/BHP-hr

14. The owner or operator shall operate and maintain this engine and control device according to the manufacturer's emission-related instructions, keep records of conducted maintenance to demonstrate compliance, and meet the requirements of 40 CFR Part 1068, as they apply.
15. Records shall be maintained to demonstrate compliance with the conditions on this permit. Such records shall be kept in a format acceptable to South Coast AQMD, shall be retained at the facility for a minimum of five years, and shall be made available to South Coast AQMD personnel upon request.
16. This permit shall expire and become invalid if construction of this equipment is not complete within one year from the date of issuance of this permit unless an extension is granted in writing by the Executive Officer. A written request for extension shall be filed with South Coast AQMD Engineering and Permitting division at least one week prior to the expiration date. The written request shall include reason(s) for the extension request, status of construction, estimated completion date, and increments of progress.

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21865 Copley Drive, Diamond Bar, CA 91765-4178

PERMIT TO CONSTRUCT/OPERATE

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Permit No.
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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

A handwritten signature in black ink, appearing to read 'J. Aspell', written over a horizontal line.

BY JASON ASPELL/JN05

2/19/2025

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

