

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

In the Matter of	)	Case No. 6139-11
	)	Facility ID 123867
VERIZON WIRELESS,	)	
	)	DECLARATION OF ZACH
Petitioner.	)	FEINGOLD
	)	
	)	
	)	
	)	

I, ZACH FEINGOLD, state:

1. I am a Verizon Wireless Regional Environmental Manager at Bloomington, 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. Pursuant thereto, Verizon Wireless operates and maintains an extensive network of wireless facilities across the United States of America, including the facility located at 13910 San Sevaine Rd., San Bernardino, California 92401, Facility ID 123865 (the “facility”).
4. The San Sevaine cell tower provides cellular telephone service throughout portions of San Bernardino County, including service used for 911 calls and other emergency communications. Continued operation of the San Sevaine 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 Kohler 103 BHP internal combustion engine, Model KG6208, propane-fueled, and is described in South Coast AQMD Permit No. is G78871.

6. Petitioner understands that operation of the engine in excess of 200 hours annually constitutes operation contrary to District Rules 203(b).

7. Beginning March 28, 2026 through July 16, 2026, the San Sevaine cell tower 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 extended operation of the emergency generator to keep the San Sevaine cell tower functional during the outage events.

8. These SCE outage events from March to August of 2026 resulted in the generator accumulating more than 197.9 hours of outage operation and 198.3 hours of total operation for the calendar year. 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 closely approach the 200-hour limit.

9. Petitioner did not operate the generator during the 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 San Sevaine cell tower.

10. Petitioner could not reasonably avoid operating the generator during the SCE outages. If Petitioner had deactivated or refused to operate the emergency generator during those outages, the San Sevaine 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.

11. During the regular variance period, Petitioner will limit operation of the generator to emergency usage and maintenance and testing and will not operate it for ordinary non-emergency purposes, load shifting, peak shaving, or elective business convenience. Petitioner will limit maintenance and testing to no more than 1 hour per month total.

12. Petitioner will maintain records of generator operation during the 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.

13. 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;
- d. PM: 1.38 lbs/day, based on 5 lbs./1000 gal;
- e. SO_x: 0.10 lbs/day, based on 0.35 lbs/1000 gal.

14. 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.

15. Petitioner will continue to comply with all other applicable South Coast AQMD rules, permit conditions, and legal requirements, except to the limited extent relief is expressly granted by the Hearing Board.

BY: Zach Feingold

Zach Feingold, Regional Environmental Manager

DATED: 9/18/2012