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SpectraSite Communications, LLC

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BEFORE THE HEARING BOARD OF THE

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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SPECTRASITE COMMUNICATIONS, LLC;

CASE NO. 6261-2

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Petitioner,

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**DECLARATION OF ANGELA
ROBERTSON**

13

vs.

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SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Hearing: September 11, 2024

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Time: 9:30 a.m.

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Respondent.

Place:

Hearing Board

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South Coast Air Quality

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Management District

21865 Copley Drive

Diamond Bar, CA 91765

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20 I, Angela Robertson, declare:

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1. I have been in the telecommunications industry for over 20 years. I am an authorized

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representative of SpectraSite Communications, LLC, ("ATC"). Initially, I was supervising Network

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Operations Center ("NOC") technicians supporting inbound calls related to Site Access, Safety,

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Lighting and Generator Technical Support. Today, I am the Director of Network Operations, leading a

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team of Asset Program Managers, supporting both Generators and HVAC. I have personal knowledge

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of the facts declared, and if called as a witness, I could and would competently testify thereto.

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2. ATC owns and operates the telecommunication facility at issue that is located at 17047 E.

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Gale Avenue, Hacienda Heights, CA 91745, facility number 194462 (the "Facility").

1 3. ATC has an internal team called Network Operations Center Generators (“NOC GEN”) that
2 has several key responsibilities such as monitoring generator alarms and transfer switches and
3 troubleshooting generator issues remotely and by leveraging onsite technicians. They work closely
4 with other stakeholders to ensure that all regions are adequately supported. This includes coordinating
5 responses to alarms and ensuring that all necessary resources are available for timely resolution.

6 4. Primary power to the Facility is provided by Southern California Edison. In case of a loss of
7 power, the Facility has a generator that provides backup power (“Emergency Generator”), which
8 includes the use of an internal combustion engine operated pursuant to Permit to Operate number
9 G65402 (“Permit”). A true and correct copy of the Permit is attached hereto as **Exhibit 1**.

10 5. Condition 4 of the Permit limits the operation of the Emergency Generator to 200 hours
11 annually during each calendar year, which includes no more than 50 hours in any one year and no
12 more than 4.2 hours in any one month for maintenance and testing purposes.

13 6. As more fully described below, the use of the Emergency Generator at the Facility has
14 exceeded the 200-hour limit for this year.

15 7. On February 6, 2024 and February 7, 2024, 35.7 hours of malfunction runtime elapsed. Due
16 to extensive flooding and intense winds, the Emergency Generator started running to provide back-up
17 power to equipment on site, but it was stuck in ‘testing mode’ for an unknown reason so the runtime
18 was not classified correctly as emergency.

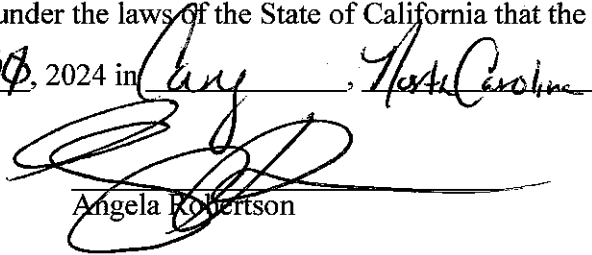
19 8. From February 14, 2024 to February 23, 2024, 182 hours of malfunction runtime elapsed.
20 There was an issue with the Emergency Generator transferring back to commercial power/utility. This
21 occurred due to a faulty main breaker that was installed on the Emergency Generator during
22 installation in 2023. Due to this main breaker issue, the Emergency Generator was running, but not
23 providing back-up power to equipment because of a connection issue with the automatic transfer
24 switch. On February 20, 2024, ATC’s generator monitoring/alarm system created an alarm-driven
25 ticket for the NOC to review due to the Emergency Generator running while utility power is available.
26 NOC reviewed a ‘Fail to Stop’ ticket and remotely resolved the issue. Generator was turned off and
27 the site resumed being powered by utility. Three days later, on February 23, 2024, NOC reviewed
28 another ‘Fail to Stop’ ticket for the Emergency Generator running with utility power and remotely

1 resolved the issue. The Emergency Generator was turned off and the site resumed being powered by
2 the utility.

3 9. The runtime exceedances that were not properly flagged due to personnel changes and human
4 error. On March 18, 2024, when referencing a generator performance report against runtime
5 allowances, ATC's HazMat became aware of the runtime hours exceeding the permitted limit, and
6 notified NOC that the Emergency Generator needed to be shut down.

7 10. Since the issue could not be resolved remotely, NOC dispatched the generator maintenance
8 vendor. To diagnose the issue, however, they will need to run the Emergency Generator for additional
9 time to confirm the root cause and complete repairs. Since the Emergency Generator has already
10 exceeded the allotted time due to the malfunction, we cannot complete the diagnostics and repair
11 without a variance. The Emergency Generator was put in shutdown mode to await further instructions
12 regarding variance approval.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct. Executed on August 30, 2024 in Cary, North Carolina.



Angela Robertson

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Exhibit 1



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

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Permit No.
G65402
A/N 628979

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:**

SPECTRASITE COMMUNICATIONS, LLC
10 PRESIDENTIAL WAY
WOBURN, MA 01801

ID 194462

11/06/03/21

Equipment Location: 17047 E GALE AVE, HACIENDA HEIGHTS, CA 91745

Equipment Description :

Internal Combustion Engine, Iveco S.P.A., 4 Cylinder, Turbocharged, Aftercooled, Model F4GE9485A*J, 131 BHP, Diesel-Fueled, 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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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: 3.0 g/bhp-hr
CO: 3.7 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.

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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 faint circular stamp.

BY JASON ASPELL/SB07

5/26/2021

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