

ORIGINAL

SOUTH COAST AQMD
CLERK OF THE BOARDS

2024 AUG 29 PM 3: 06

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

IV 9/5/24
RV 11/7/24

PETITIONER: MEDLINE INDUSTRIES, LP

CASE NO: 6265-1

FACILITY ID: 180785

FACILITY ADDRESS: 1960 W. Miro Way,
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Rialto, CA 92376

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).

Rebecca Brown, EHS Regional Manager

Jodie Peltier

Medline Industries, LP

Construction Project Manager

42500 Winchester Road, Temecula CA

Three Lakes, Dr. Northfield, IL

Zip 92590

Zip 60093

(951) 491-3747 Ext.

(224) 627-3937 Ext.

Fax () N/A

Fax () N/A

E-mail: rabrown@medline.com

E-mail jpeltier@medline.com

3. RECLAIM Permit Yes No

Title V Permit Yes No

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)

This is a submission for an emergency variance due to a building power failure that resulted in significant damage to our buildings main service switchgear, which was sustained during a shut down to expand our solar array on 8/25/24. Our business is the largest distributor of medical supplies in the region, and our

customers rely on multiple daily deliveries of those medical supplies across area hospitals, surgery centers, immediate care centers, assisted living facilities and doctors offices alike. As our business is mission critical, and because of the severe damaged caused to the main service feed, the generators are our only means of continued operation. We anticipate the repair to take longer than 7days, which will then exceed the time of 200hours currently permitted.

On 8/25/24 one of the buildings main electrical switchboards was damaged and lost power. Due to this the building will need to run on emergency generators to power the facility until this is remedied. We anticipate the repair to take longer than 7days, which will then exceed the time of 200hours currently permitted since we must run our business 7days a week, 24/7.

On 8/25/24, a contracting company, MSB, was installing solar panels for the building and damaged one of the buildings main switchboards making it inoperable. The building had to quickly respond and activate 3 of the 6 emergency generators to continue safe business operations.

Immediately following the incident on August 25th 2024, on this day Medline has been working with multiple vendors and contractors to expedite the purchase and installation of the equipment necessary to repair/replace the damaged switchboard.

Following this unforeseen event we've communicated with contractors who have stated the lead time will take approximately 35 weeks. We will need 4000 amp 100K SCE UGPS, Meter Section, 4000 Amp Main, and Distribution to accommodate 2000 amp load, 1000 Amp and 800 Amp loads.

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

Primary supply partner for area medical and hospital supplies and equipment. This is a distribution operation that runs 24/7 to meet the needs of area medical facilities.

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)*
Emergency Generator	G37610	N/A	N/A
Emergency Generator	G37611	N/A	N/A
Emergency Generator	G37612	N/A	N/A
Emergency Generator	G37613	N/A	N/A
Emergency Generator	G37614	N/A	N/A
Emergency Generator	G37615	N/A	N/A

*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.

One of the buildings main switchboards was severely damaged and lost power requiring the facility to run on emergency generator support until it can be repaired. The switchboard supports all building operations, including life safety across the operation. Emergency generators will need to continue to operate to keep the building in operation until the switchboard can be repaired.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No

If yes, how often: Quarterly Date of last maintenance and/or inspection 7/31/24

Describe the maintenance and/or inspection that was performed.

Routine inspection and preventive maintenance of the emergency generators performed by a third party service. See attached "PM Scope" pdf document

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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
#4 under Conditions of permit	This engine shall not be operated more than 200hours in any one year, which includes no more than 50 hours in any one year for maintenance and testing and no more than 4.2 hours in any one month for maintenance and testing.

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.

On 8/25/24, a contracting company, MSB, was installing solar panels for the building and damaged one of the buildings main switchboards making it inoperable. The building had to quickly respond and activate the site emergency generators to continue safe business operations. Our building runs 7 days a week 24/7 to support our customer needs.

Medline is making every effort to comply with the permit requirements, however, due to this emergency event will exceed the current permitted allowance of 200hrs for its emergency generator usage. Due to the critical nature of the business the facility must be able to continue to operate and therefore requires continued use of the emergency generators until the switchboard can be repaired. Medline is working with multiple vendors to pursue every available repair and sourcing opportunity possible, to expedite the switchboard and return to normal operation and will continue to do everything in our power to safely expedite this project for compliance.

Following this unforeseen event we've communicated with contractors who have stated the lead time will take approximately 35 weeks. We will need 4000 amp 100K SCE UGPS, Meter Section, 4000 Amp Main, and Distribution to accommodate 2000 amp load, 1000 Amp and 800 Amp loads.

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).

On Sunday 8/25/24, a contracting company, was installing solar panels for the building and damaged one of the buildings main switchboards making it inoperable. The building had to quickly respond and activate the sites emergency generators to continue safe business operations.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

Immediately following the incident on August 25th 2024, Medline has been working with multiple vendors and contractors around the clock to expedite the procurement of the equipment necessary to repair/replace the

damaged switchboard. Medline has also transferred all possible loads to the working section of the service, to minimize the load supported by the generators.

Additionally, the facility is exploring alternative energy options such as temporary solar panels to help reduce the use of the emergency generators until we can procure permanent equipment.

Following this unforeseen event we've communicated with contractors who have stated the lead time will take approximately 35 weeks. We will need 4000 amp 100K SCE UGPS, Meter Section, 4000 Amp Main, and Distribution to accommodate 2000 amp load, 1000 Amp and 800 Amp loads.

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: \$ Hundreds of Millions Unable to determine at this time, but it would be detrimental to the business and our customers (hospitals, care centers, etc.) that rely on our business to continue operating.

Number of employees laid off (if any): Entire team of over 500(+) employees and drivers

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

If the variance were not approved the facility would not be able to safely operate and would need to close or partially close. This would not only impact Medline and its employees, but also our customers and the community who rely on access to medical supplies for thousands of procedures, visits and care that occur in the region. Medline is a medical supplies and equipment distributor and we provide service to many hospitals, care centers, assisted living homes, etc. in the area that rely on our products to arrive daily, and in many cases, several times a day, to provide care for their patients. We are essentially the 'storage room' for our customers, not being able to ship orders would have an immediate and devastating impact to the region.

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

No, this is not an option as we service many hospitals and clinics that operate 24/7 and rely on Medline and its products daily. We need to ensure we have our safety systems running for employees onsite and to be able to run our systems for medical distribution.

Our business runs 7 days a week, 24/7.

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)
PM	13.858 lbs/day	NA	13.858 lbs/day

* Column A minus Column B = Column C

Excess Opacity: _____ %

20. Show calculations used to estimate quantities in No.19, or explain why there will be no excess emissions.

Assumptions:

- 3 Emergency Generators in use
- Maintenance Annual Operation Time = 12 days x 2 hours
- Estimated Emergency Operation Time = 68 days x 24 hours
- Fuel Consumption Factor = Diesel Fuel Consumption Factor listed on AQMD Table 1 reference
- EF = Default Emission Factor for Diesel as listed in AQMD Table 2 reference

Emergency Incident Usage

Fuel Consumption = Operation Time x Engine Rating x Fuel Consumption Factor

Fuel Consumption = 1,632 hours x 762 bhp x 0.0000511 Mgal/bhp-hr

Fuel Consumption = 63.547 Mgal/hr x 3 generators

Fuel Consumption = 190.341 Mgal/hr

Emergency Incident Usage

EMS = Fuel Consumption x EF

EMS = 190.34 Mgal/hr x 5.025 lb/Mgal

EMS PM = 956.459 lbs

Annual Maintenance Operation

EMS = Fuel Consumption x EF

EMS = 2.805 Mgal/hr x 5.025 lb/Mgal

EMS PM = 14.095 lbs

EMS PM = 957.971 lbs – 14.095 lbs = 943.876

Total Estimated Excess Emissions per day = 942.364 lbs / 68 days = **13.858 lbs/day**

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.

If we see any opportunity where we will not have to run our emergency generators, we will turn them off in the interim. As previously stated, we've minimized the connected load, we are only running the needed engines and this will help mitigate excess emissions. As you are likely aware, our very large solar array atop our 1 million square foot facility is a helpful mitigation strategy and as soon as this can be fixed we will complete the expansion project that was under way to increase our solar panels on the roof.

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.**

Medline is working with our third party generator contractor who will help us track and monitor usage of all generators at the site during this time period. These records can be made available to the District upon request.

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.

Due to this emergency event, we will not be able to maintain compliance within the current permit conditions. However, Medline is evaluating all options to reduce generator runtime as much as possible.

Because we have six generator onsite, we plan to run 3 at a time then switch to the next 3 to help limit runs times.

24. State the date you are requesting the variance to begin: September 6th 2024; and the date by which you expect to achieve final compliance: **Tentative for October 31st**

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:

Currently we do not have this information, once we do we'll provide.

August 26th – incident occurred, generators fired up.

Thru October 4th – secure electrical components, execute engineering plans, coordinate approvals with AHJ and schedule repair once materials can be delivered.

Pending delivery of equipment, execute installation plan and cut over by 10/31.

While we are working very hard to SIGNIFICANTLY improve that, in our experience, the switchgear for a service this size (4,000 amps), and its various interconnected components are effectively custom built. We do not yet have commitments on what lead times may be so we are being very aggressive in our expectations and hope to execute it within this time frame.

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.

Building Inspector, Jay Garcia – 909-820-8091

Ext.

If the petition was completed by someone other than the petitioner, please provide their name and title below.


Name

Company

Title

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 _____, at _____, California


Signature

Rebecca Brown
Print Name

Title: EHS Manager _____



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

PERMIT TO OPERATE

Page 1
Permit No.
G37614
A/N 578284

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.f) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

MEDLINE INDUSTRIES, INC.
1 MEDLINE PL
MUNDELEIN, IL 60060-4486

ID 180785

Equipment Location: 1960 W MIRO WAY, RIALTO, CA 92376

Equipment Description :

Internal combustion engine, Perkins, model no. 2506C-E15TAG3, 762 bhp (568 kw), 6 cylinder, turbocharged, aftercooled 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. A 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 for maintenance and testing and no more than 4.2 hours in any one month for maintenance and testing.
5. Operation beyond the 50 hours per year allotted for engine maintenance and testing 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: (a) 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 (b) 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. The operator shall operate and maintain the stationary engine according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.
7. The operator shall comply with emission standards specified in 40 CFR 60.4205(b) by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b), as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission related specifications.



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PERMIT TO OPERATE

8. Emissions from this engine shall not exceed the following (in grams/bhp-hr):

NMHC + NOX	4.8
CO	2.6
PM (PM10)	0.15

9. The operator shall only use low sulfur diesel fuel with a sulfur content that does not exceed 15 ppm by weight.

10. This engine shall not be used as part of a demand response program using an 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 do so by the utility or the grid operator.

11. An engine operating log of engine operations shall be kept and maintained documenting the total time the engine is operated each month and the specific reason for operation such as:

- A. Emergency use
- B. Maintenance and testing
- C. Other (be specific)

In addition, for each time the engine is manually started, the log shall include the date of engine operation, the specific reason for operation, and the totalizing hour meter readings (in hours and tenths of hours) at the beginning and the end of the operation.

12. On or before January 15th of each year, the operator shall record in the engine operating log:

- A. The total hours of engine operation for the previous calendar year, and
- B. The total hours of engine operation for maintenance and testing for the previous calendar year.

13. Engine operation log(s) shall be retained on site for a minimum of three calendar years and shall be made available to the Executive Officer or representative upon request.

14. This engine shall comply with the applicable requirements of rules 431.2, 1470 and 1472.





PERMIT TO OPERATE

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

By Dorris M. Bailey/WC01
10/6/2015





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

Page 1
Permit No.
GJ37613
A/N 578287

PERMIT TO OPERATE

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**Legal Owner
or Operator:**

MEDLINE INDUSTRIES, INC.
1 MEDLINE PL
MUNDELEIN, IL 60060-4486

ID 180785

Equipment Location: 1960 W MIRO WAY, RIALTO, CA 92376

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6. The operator shall operate and maintain the stationary engine according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.
7. The operator shall comply with emission standards specified in 40 CFR 60.4205(b) by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b), as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission related specifications.



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PERMIT TO OPERATE

8. Emissions from this engine shall not exceed the following (in grams/bhp-hr):

NMHC + NOX	4.8
CO	2.6
PM (PM10)	0.15

9. The operator shall only use low sulfur diesel fuel with a sulfur content that does not exceed 15 ppm by weight.

10. This engine shall not be used as part of a demand response program using an 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 do so by the utility or the grid operator.

11. An engine operating log of engine operations shall be kept and maintained documenting the total time the engine is operated each month and the specific reason for operation such as:

- A. Emergency use
- B. Maintenance and testing
- C. Other (be specific)

In addition, for each time the engine is manually started, the log shall include the date of engine operation, the specific reason for operation, and the totalizing hour meter readings (in hours and tenths of hours) at the beginning and the end of the operation.

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- B. The total hours of engine operation for maintenance and testing for the previous calendar year.

13. Engine operation log(s) shall be retained on site for a minimum of three calendar years and shall be made available to the Executive Officer or representative upon request.

14. This engine shall comply with the applicable requirements of rules 431.2, 1470 and 1472.





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

Page 3
Permit No.
G37613
A/N 578287

PERMIT TO OPERATE

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Executive Officer

By Dorris M. Bailey/WC01
10/6/2015



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

PERMIT TO OPERATE

Page 1
Permit No.
G37612
A/N 578288

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
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Legal Owner
or Operator:

MEDLINE INDUSTRIES, INC.
1 MEDLINE PL
MUNDELEIN, IL 60060-4486

ID 180785

Equipment Location: 1960 W MIRO WAY, RIALTO, CA 92376

Equipment Description :

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5. Operation beyond the 50 hours per year allotted for engine maintenance and testing 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: (a) 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 (b) 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. The operator shall operate and maintain the stationary engine according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.
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PERMIT TO OPERATE

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NMHC + NOX	4.8
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9. The operator shall only use low sulfur diesel fuel with a sulfur content that does not exceed 15 ppm by weight.

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Executive Officer

By Dorris M. Bailey/WC01
10/6/2015





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

PERMIT TO OPERATE

Page 1
Permit No.
G37611
A/N 578289

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Legal Owner
or Operator:

MEDLINE INDUSTRIES, INC.
1 MEDLINE PL.
MUNDELEIN, IL 60060-4486

ID 180785

Equipment Location: 1960 W MIRO WAY, RIALTO, CA 92376

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5. Operation beyond the 50 hours per year allotted for engine maintenance and testing 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: (a) 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 (b) 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. The operator shall operate and maintain the stationary engine according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.
7. The operator shall comply with emission standards specified in 40 CFR 60.4205(b) by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b), as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission related specifications.



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8. Emissions from this engine shall not exceed the following (in grams/bhp-hr):

NMHC + NOX	4.8
CO	2.6
PM (PM10)	0.15

9. The operator shall only use low sulfur diesel fuel with a sulfur content that does not exceed 15 ppm by weight.
10. This engine shall not be used as part of a demand response program using an 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 do so by the utility or the grid operator.
11. An engine operating log of engine operations shall be kept and maintained documenting the total time the engine is operated each month and the specific reason for operation such as:
- A. Emergency use
 - B. Maintenance and testing
 - C. Other (be specific)

In addition, for each time the engine is manually started, the log shall include the date of engine operation, the specific reason for operation, and the totalizing hour meter readings (in hours and tenths of hours) at the beginning and the end of the operation.

12. On or before January 15th of each year, the operator shall record in the engine operating log:
- A. The total hours of engine operation for the previous calendar year, and
 - B. The total hours of engine operation for maintenance and testing for the previous calendar year.
13. Engine operation log(s) shall be retained on site for a minimum of three calendar years and shall be made available to the Executive Officer or representative upon request.
14. This engine shall comply with the applicable requirements of rules 431.2, 1470 and 1472.





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

Page 3
Permit No.
G37611
A/N 578289

PERMIT TO OPERATE

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

By Dorris M. Bailey/WC01
10/6/2015



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

PERMIT TO OPERATE

Page 1
Permit No.
G37610
A/N 578290

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.f) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

MEDLINE INDUSTRIES, INC.
1 MEDLINE PL
MUNDELEIN, IL 60060-4486

ID 180785

Equipment Location: 1960 W MIRO WAY, RIALTO, CA 92376

Equipment Description :

Internal combustion engine, Perkins, model no. 2506C-E15TAG3, 762 bhp (568 kw), 6 cylinder, turbocharged, aftercooled, 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. A 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 for maintenance and testing and no more than 4.2 hours in any one month for maintenance and testing.
5. Operation beyond the 50 hours per year allotted for engine maintenance and testing 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: (a) 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 (b) 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. The operator shall operate and maintain the stationary engine according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.
7. The operator shall comply with emission standards specified in 40 CFR 60.4205(b) by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b), as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission related specifications.



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PERMIT TO OPERATE

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NMHC + NOX	4.8
CO	2.6
PM (PM10)	0.15

9. The operator shall only use low sulfur diesel fuel with a sulfur content that does not exceed 15 ppm by weight.

10. This engine shall not be used as part of a demand response program using an 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 do so by the utility or the grid operator.

11. An engine operating log of engine operations shall be kept and maintained documenting the total time the engine is operated each month and the specific reason for operation such as:

- A. Emergency use
- B. Maintenance and testing
- C. Other (be specific)

In addition, for each time the engine is manually started, the log shall include the date of engine operation, the specific reason for operation, and the totalizing hour meter readings (in hours and tenths of hours) at the beginning and the end of the operation.

12. On or before January 15th of each year, the operator shall record in the engine operating log:

- A. The total hours of engine operation for the previous calendar year, and
- B. The total hours of engine operation for maintenance and testing for the previous calendar year.

13. Engine operation log(s) shall be retained on site for a minimum of three calendar years and shall be made available to the Executive Officer or representative upon request.

14. This engine shall comply with the applicable requirements of rules 431.2, 1470 and 1472.





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

Page 3
Permit No.
G37610
A/N 578290

PERMIT TO OPERATE

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Executive Officer

By Dorris M. Bailey/WC01
10/6/2015



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

PERMIT TO OPERATE

Page 3
Permit No.
G37615
A/N 578282

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.f) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

MEDLINE INDUSTRIES, INC.
1 MEDLINE PL.
MUNDELEIN, IL 60060-4486

ID 180785

Equipment Location: 1960 W MIRO WAY, RIALTO, CA 92376

Equipment Description :

Internal combustion engine, Perkins, model no. 2506C-E15 TAG3, 762 bhp (568 kw), 6 cylinder, turbocharged, aftercooled, 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. A 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 for maintenance and testing and no more than 4.2 hours in any one month for maintenance and testing.
5. Operation beyond the 50 hours per year allotted for engine maintenance and testing 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: (a) 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 (b) 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. The operator shall operate and maintain the stationary engine according to the manufacturer's written emission-related instructions (or procedures developed by the operator that are approved by the engine manufacturer), change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply.
7. The operator shall comply with emission standards specified in 40 CFR 60.4205(b) by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b), as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission related specifications.



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PERMIT TO OPERATE

8. Emissions from this engine shall not exceed the following (in grams/bhp-hr):

NMHC + NOX	4.8
CO	2.6
PM (PM10)	0.15

9. The operator shall only use low sulfur diesel fuel with a sulfur content that does not exceed 15 ppm by weight.

10. This engine shall not be used as part of a demand response program using an 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 do so by the utility or the grid operator.

11. An engine operating log of engine operations shall be kept and maintained documenting the total time the engine is operated each month and the specific reason for operation such as:

- A. Emergency use
- B. Maintenance and testing
- C. Other (be specific)

In addition, for each time the engine is manually started, the log shall include the date of engine operation, the specific reason for operation, and the totalizing hour meter readings (in hours and tenths of hours) at the beginning and the end of the operation.

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- A. The total hours of engine operation for the previous calendar year, and
- B. The total hours of engine operation for maintenance and testing for the previous calendar year.

13. Engine operation log(s) shall be retained on site for a minimum of three calendar years and shall be made available to the Executive Officer or representative upon request.

14. This engine shall comply with the applicable requirements of rules 431.2, 1470 and 1472.





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

Page 3
Permit No.
G37615
A/N 578282

PERMIT TO OPERATE

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Executive Officer

By Dorris M. Bailey/WC01
10/6/2015



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Scope of Work for Inspection of a Generator

- ✓ **Engine and Oil**
 - ✓ Check oil level and fill as needed, record amount replaced.
 - ✓ Check oil heater for proper operation and leaks
 - ✓ Check all belts for excessive wear, cracks and adjust if needed
 - ✓ Check all ignition wires and distributor cracks, corrosion and carbon tracking
 - ✓ Check engine and alternator vibration mounts for wear and alignment
 - ✓ Check oil system and engine seals for leakage.
 - ✓ Check governor for proper operation and adjust as needed.
 - ✓ Check governor linkage lubricate and adjust as needed
 - ✓ Check governor oil level and add if needed
 - 1. Check pillow block bearings for wear and lubricate as needed
- Cooling System
- ✓ Check coolant level and fill as needed
 - ✓ Check DCA coolant levels, freeze point protection and make recommendations as needed
 - ✓ Check cooling system for signs of leakage
 - ✓ Check jacket water heater for proper operation and leaks
 - ✓ Check for pliability and cracks of all coolant hoses
 - ✓ Check radiator for leaks and correct water flow and air flow
 - ✓ Check for proper operation of solenoid valves and leaks
 - ✓ Check and lubricate cooling system fan
 - ✓ Check louver operation and adjust if needed
 - 2. Check radiator cap and seals for cracks and leaks
- ✓ **Fuel Systems**
 - ✓ Check injector pump lines for leaks
 - ✓ Check injector supply and return for cracks leaks and pliability
 - ✓
 - ✓ Check proper operation of lift pump
 - ✓ Check Water Separator and drain if needed
- Check and record main fuel tank level
3. Check for proper day tank operation and fuel level
- ✓ **Battery and Starting System**
 - ✓ Check and record minimum crank voltage
 - ✓ Check start solenoid terminals for corrosion and tighten if needed
 - ✓ Check starter for proper operation
 - ✓ Clean, treat all battery terminals for corrosion and tighten if needed
 - ✓ Check battery fluid levels and add if needed
 - ✓ Check and record alternator voltage
 - 4. Check, record battery charger voltage and adjust if needed
- ✓ **Intake System**
 - ✓ Check all hoses and clamps for leaks, pliability and tighten if needed

- ✓ Check turbo charger connection for leaks and tighten if needed
5. Check condition of Air filter

- ✓ **Exhaust Systems**
 - ✓ Check flexible exhaust pipes for leaks, cracks and corrosion
 - ✓ Drain condensation from exhaust silencer
 - ✓ Check proper operation of rain cap
 - ✓ Check all exhaust piping for leaks, oil slobbering and corrosion
6. Check exhaust manifold for leaks, oil slobbering and corrosion

- ✓ **Electrical**
- ✓ Check control panel relays for proper operation and corrosion
- ✓ Check solid state circuits for proper operation and corrosion
- ✓ Check exciter for proper operation
- ✓
- ✓ Check rotating diodes for proper operation and corrosion
- ✓ Check all electrical connections for corrosion, cracked insulation and tighten if needed

Operational Checks

- ✓ Test over crank alarm for proper operation and illumination
 - ✓ Test low oil pressure alarm for proper operation and illumination
 - ✓ Test high water temperature alarm for proper operation and illumination
 - ✓ Test over speed alarm for proper operation and illumination
 - ✓ Test all equipped pre-alarms for proper operation and illumination
 - ✓ Check and record voltage without load and adjust if needed
 - ✓ Check and record frequency without load and adjust if needed
 - ✓ Check and record cooling system temperature
 - ✓ Simulate power loss with customers approval only
 - ✓ Check and record voltage with load and adjust if needed
 - ✓ Check and record frequency with load and adjust if needed
7. Check and record amperage with load

- ✓ **Final Checks**
 - ✓ Verify main breaker in closed position
 - ✓ Verify automatic start switch is in correct position
 - ✓ Clean generator and alternator
 - ✓ Clean area around generator from loose debris
 - ✓ Provide a summary of maintenance performed
 - ✓ Provide copies of all preventative maintenance data to operations manager
8. Provide follow up recommendations, if discrepancies are noted during the inspection

Scope of Work for Annual Generator Service

Engine and Oil

- ✓ Drain and replace engine oil
 - ✓ Replace oil filters
 - ✓ Take oil sample for oil analysis (if contracted) and report back if needed. Testing shall be for wear metals, contaminate metals, additive metals and multisource metals (if contracted).
 - ✓ Check oil heater for proper operation and leaks
 - ✓ Check all belts for excessive wear, cracks and adjust if needed
 - ✓ Check all ignition wires and distributor cracks, corrosion and carbon tracking
 - ✓ Check engine and alternator vibration mounts for wear and alignment
 - ✓ Check oil system and engine seals for leakage.
 - ✓ Check governor for proper operation and adjust as needed.
 - ✓ Check governor linkage lubricate and adjust as needed
 - ✓ Check governor oil level and add if needed
9. Check pillow block bearings for wear and lubricate as needed
- ✓ **Cooling System**
 - ✓ Change coolant filter as needed
 - ✓ Check coolant level and fill as needed
 - ✓ Check DCA coolant levels, freeze point protection and make recommendations as needed
 - ✓ Check cooling system for signs of leakage
 - ✓ Check jacket water heater for proper operation and leaks
 - ✓ Check for pliability and cracks of all coolant hoses
 - ✓ Check radiator for leaks and correct water flow and air flow
 - ✓ Check for proper operation of solenoid valves and leaks
 - ✓ Check and lubricate cooling system fan
 - ✓ Check louver operation and adjust if needed
10. Check radiator cap and seals for cracks and leaks

Fuel Systems

- ✓ Replace fuel filters
 - ✓ Prime fuel system prior to starting
 - ✓ Check injector pump lines for leaks
 - ✓ Check injector supply and return for cracks leaks and pliability
 - ✓ Check proper operation of lift pump
 - ✓ Check Water Separator and drain if needed
 - ✓ Check and record main fuel tank level
11. Check for proper day tank operation and fuel level
- ✓ **Battery and Starting System**
 - ✓ Check and record minimum crank voltage
 - ✓ Check start solenoid terminals for corrosion and tighten if needed
 - ✓ Check starter for proper operation
 - ✓ Clean, treat all battery terminals for corrosion and tighten if needed
 - ✓ Check battery fluid levels and add if needed
 - ✓ Check and record alternator voltage
12. Check, record battery charger voltage and adjust if needed

- ✓ **Intake System**
 - ✓ Check all hoses and clamps for leaks, pliability and tighten if needed
 - ✓ Check turbo charger connection for leaks and tighten if needed
13. Check condition of Air filter
- ✓ **Exhaust Systems**
 - ✓ Check flexible exhaust pipes for leaks, cracks and corrosion
 - ✓ Drain condensation from exhaust silencer
 - ✓ Check proper operation of rain cap
 - ✓ Check all exhaust piping for leaks, oil slobbering and corrosion
14. Check exhaust manifold for leaks, oil slobbering and corrosion
- ✓ **Electrical**
 - ✓ Check control panel relays for proper operation and corrosion
 - ✓ Check solid state circuits for proper operation and corrosion
 - ✓ Check exciter for proper operation
 - ✓ Check rotating diodes for proper operation and corrosion
15. Check all electrical connections for corrosion, cracked insulation and tighten if needed
- ✓ **Operational Checks**
 - ✓ Test over crank alarm for proper operation and illumination
 - ✓ Test low oil pressure alarm for proper operation and illumination
 - ✓ Test high water temperature alarm for proper operation and illumination
 - ✓ Test over speed alarm for proper operation and illumination
 - ✓ Test all equipped pre-alarms for proper operation and illumination
 - ✓ Check and record voltage without load and adjust if needed
 - ✓ Check and record frequency without load and adjust if needed
 - ✓ Check and record cooling system temperature
 - ✓ Simulate power loss with customers approval only
 - ✓ Check and record voltage with load and adjust if needed
 - ✓ Check and record frequency with load and adjust if needed
16. Check and record amperage with load
- ✓ **Final Checks**
 - ✓ Verify main breaker in closed position
 - ✓ Verify automatic start switch is in correct position
 - ✓ Clean generator and alternator
 - ✓ Clean area around generator from loose debris
 - ✓ Provide a summary of maintenance performed
 - ✓ Provide copies of all preventative maintenance data to operations manager
17. Provide follow up recommendations, if discrepancies are noted during the inspection

Scope of Work for Load Bank Test

- ✓ Inspection
 - ✓ Clean and Inspect area around generator and load bank
 - ✓ Complete inspection scope of work for a generator prior to load test
 - ✓ Open all breakers on the generator
 - ✓ Switch generator to the off position
 - ✓ Switch the automatic transfer switch to the manual position
 - ✓ Open the automatic transfer switch breaker or rack out the breaker
 - ✓ Complete lock out tag out procedure
 - ✓ Tie in load bank to either; generator breaker, automatic transfer switch, step down transformer, switch gear breaker or designated load bank section of the switch gear to NEC standards
 - ✓ Verify land bank is properly grounded to NEC standards
 - ✓ Start generator and run for 5 minutes verify generator is operating correctly prior to test
18. Close generator main breaker

Load Test

- ✓ Apply 20% load for 10 minutes
 - ✓ Check and record oil pressure
 - ✓ Check and record water temperature
 - ✓ Check and record frequency
 - ✓ Check and record voltage
 - ✓ Check and record Kilowatts
 - ✓ Check and record amperage
 - ✓ Check for any oil leaks and coolant leaks
 - ✓ Verify exhaust temperature is at correct OEM specifications
19. Verify radiator has sufficient air flow and the water temperature stays within the OEM specifications
-
- ✓ **Apply 40% load for 10 minutes**
 - ✓ Check and record oil pressure
 - ✓ Check and record water temperature
 - ✓ Check and record frequency
 - ✓ Check and record voltage
 - ✓ Check and record Kilowatts
 - ✓ Check and record amperage
 - ✓ Check for any oil leaks and coolant leaks
 - ✓ Verify exhaust temperature is at correct OEM specifications
20. Verify radiator has sufficient air flow and the water temperature stays within the OEM specifications
-
- ✓ **Apply 60% load for 10 minutes**
 - ✓ Check and record oil pressure
 - ✓ Check and record water temperature
 - ✓ Check and record frequency
 - ✓ Check and record voltage
 - ✓ Check and record Kilowatts
 - ✓ Check and record amperage
 - ✓ Check for any oil leaks and coolant leaks
 - ✓ Verify exhaust temperature is at correct OEM specifications
 - ✓ Verify radiator has sufficient air flow and the water temperature stays within the OEM specifications

- ✓ **Apply 80% load for 10 minutes**
- ✓ Check and record oil pressure
- ✓ Check and record water temperature
- ✓ Check and record frequency
- ✓ Check and record voltage
- ✓ Check and record Kilowatts
- ✓ Check and record amperage
- ✓ Check for any oil leaks and coolant leaks
- ✓ Verify exhaust temperature is at correct OEM specifications
- 21. Verify radiator has sufficient air flow and the water temperature stays within the OEM specifications
- ✓ **Apply 100% load for 10 minutes**
- ✓ Check and record oil pressure
- ✓ Check and record water temperature
- ✓ Check and record frequency
- ✓ Check and record voltage
- ✓ Check and record Kilowatts
- ✓ Check and record amperage
- ✓ Check for any oil leaks and coolant leaks
- ✓ Verify exhaust temperature is at correct OEM specifications
- 22. Verify radiator has sufficient air flow and the water temperature stays within the OEM specifications
- ✓ **Reduce load to 80% for the remainder of the desired load bank test and record the following data every 10 minutes**
- ✓ Check and record oil pressure
- ✓ Check and record water temperature
- ✓ Check and record frequency
- ✓ Check and record voltage
- ✓ Check and record Kilowatts
- ✓ Check and record amperage
- ✓ Check for any oil leaks and coolant leaks
- ✓ Verify exhaust temperature is at correct OEM specifications
- ✓ Verify radiator has sufficient air flow and the water temperature stays within the OEM specifications
- ✓ 100% Block load dump to be preformed at customers request
- 23. Perform 5 minute cool down prior to turning generator off
- ✓ **Disconnecting load bank**
- ✓ Open all breakers on the generator
- ✓ Switch generator to the off position
- ✓ Switch the automatic transfer switch to the manual position
- ✓ Open the automatic transfer switch breaker or rack out the breaker
- ✓ Complete lock out tag out procedure
- ✓ Disconnect load bank from either; generator breaker, automatic transfer switch, step down transformer, switch gear breaker or designated load bank section of the switch gear to NEC standards
- ✓ Reinstall wiring to original termination points
- ✓ Close all breakers on the generator

- ✓ Switch generator to the on position
 - ✓ Switch automatic transfer switch to the manual position
 - ✓ Close the automatic transfer switch breaker or racked in position
 - ✓ Remove "lock out tag out" locks and tags
24. Verify phase rotation from generator to utility power

Final Checks

- ✓ Verify main breaker in closed position
 - ✓ Verify automatic start switch is in correct position
 - ✓ Clean area around generator and automatic transfer switch from loose debris
 - ✓ Provide a summary of load bank test performed
 - ✓ Provide copies of test report to operations manager
25. Provide follow up recommendations, if discrepancies are noted during the inspection