



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of WMATA Bladensburg
Inspection Date(s): 10/25/2022
Regulatory Program(s): SIP, NSPS, MACT
Company Name: Washington Metro Area Transit Authority
Facility Name: WMATA Bladensburg Bus Facility
Facility Location: 2251 26th Street NE
Washington, D.C. 20018
Latitude: 38.92247 **Longitude:** -76.96983
County/Parish: Washington D.C.
ICIS Number: 03000DC00001
Permit Number: Formerly No. 39
NAICS Code: 485113 **SIC:** 4111
Unique Project #: N/A

Facility Representatives:	Point of Contact
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Rahman Robinson, Facility Manager, WMATA Phone: n/a Contact: rkrobinson@wmata.com	☐
Dana Jones, Environmental Services, WMATA Phone: n/a Contact: dhjones@wmata.com	☐

EPA Inspectors:
Bruce Augustine, Environmental Scientist, 3ED21
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Riley Burger, EPA Region 3, 3ED21
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EPA Lead Inspector

Signature

Bruce Augustine

Date

Four Penn Center – 1600 John F Kennedy
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Supervisor

Signature

Erin Malone

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Washington Metro Area Transit Authority Bladensburg Garage (WMATA or Facility) to verify compliance with applicable State and Federal regulations. The District of Columbia Department of the Energy and the Environment (DOEE) was notified of the inspection on October 5, 2022 via email. On October 21, 2022, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Basil Borisov, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

A. Summary of the Facility

The Facility is located at 2251 26th Street NE, Washington DC. WMATA is a tri-state government agency that operates buses and trains in Maryland, Virginia, and the District of Columbia. WMATA was formed through an act of Congress and is represented by board members from Maryland, Virginia, the District of Columbia, and the federal government. The capital budget for WMATA comes from the federal government while the operating budget is provided by the local jurisdictions and fares collected.

The Facility received a Title V operating permit (Permit Number 39) from DOEE issued on March 31, 2014. On October 7, 2022, WMATA requested termination of the Title V permit because several emissions sources had been decommissioned or removed from the site and potential emissions are below major source thresholds. On October, 17, 2022, DOEE rescinded the Title V permit. The Bladensburg Site is now permitted as a minor source for all criteria pollutants.

The Facility is subject to, or potentially subject to the following federal regulations:

- 40 C.F.R. Part 60 Subpart IIII: New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (NSPS 4I)
- 40 C.F.R. Part 63 Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT 4Z)
- 40 C.F.R. Part 63 Subpart CCCCCC: National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (MACT 6C)

B. Inspection Opening Conference

At 9:07AM on October 25, 2022, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. WMATA was represented by Basil Borisov, Dana Jones, and Rahman Robinson. In addition, WMATA was represented by Jan Walker and Tiffany Dillow from Power Engineers; Mark Gibson of RCI; and Kodzo Awo of Clean Energy. DOEE was not present for the inspection. EPA inspectors Bruce Augustine, Riley Burger and Carly Joseph, presented their credentials and explained the purpose of the visit was to conduct a Clean Air Act inspection to determine compliance with their permit and any applicable regulations.

EPA inspectors Chris Williams and Nicholas Bobbs, from EPA's Office of Enforcement & Compliance Assurance were also present for the inspection, EPA instructed WMATA that mobile emission monitoring would be conducted using data acquisition in real time (DART). The DART mobile monitoring device uses a mobile gas chromatograph to detect volatile organic compounds (VOC) in the atmosphere. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, WMATA did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

WMATA is comprised of a bus and rail division. The Bladensburg Garage is part of the bus division and serves as a maintenance and fueling station for commuter buses that operate in Maryland, Virginia, and the District of Columbia. WMATA currently operates nine bus maintenance facilities, while two additional sites are temporarily closed. The Bladensburg Site performs general bus maintenance including tire repairs, seat and window replacement, and light bodywork. The facility has approximately 90 employees (not including drivers) and houses 258 buses. The facility also performs CNG bus refueling. According to facility representatives, the Bladensburg Site used to conduct heavy maintenance on the buses but that has been moved to the garage near Andrews AFB. There used to be several paint booths at the site also that were used to paint buses after major repairs or bodywork. All painting has also been transferred to the Andrews AFB site. WMATA has purchased the lot adjacent to the Bladensburg Site and has begun construction on a new bus maintenance garage. That site will replace the current facility sometime in 2025.

WMATA indicated that the life of commuter bus is approximately 12 years and it undergoes a rehabilitation at about six years. The natural gas tank on compressed natural gas (CNG) buses doesn't last as long as traditional liquid fuel tanks. The majority of the buses are fueled with natural gas while about 15% of the fleet are hybrid diesel buses. Natural gas is supplied to the site by the Washington Gas pipeline and there are two gas meters: one for the bus fueling and one for the building. The Facility has four diesel fueling pumps and four CNG fueling lanes. WMATA conducts quarterly sampling of diesel fuel shipments for sulfur content.

The Bladensburg Site operated two boilers and several emergency generators. However, most of those sources have been removed from the site. Two diesel emergency generators remain onsite: one fire pump (EG2) and one used to provide power to the CNG fueling racks (EG5). Each of the generators is equipped with an hour meter. There are no other combustion sources at the site.

The opening conference concluded at 9:55AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 9:58AM by WMATA representatives and EPA inspectors Bruce Augustine, Carly Joseph, Riley Burger, and Chris Williams were also present for the walkthrough. EPA inspectors noted photos would be taken

during the Facility walkthrough (Attachment 2). Also, EPA used a FLIR GF320 infrared camera during the walkthrough to observe the fueling racks and other sources (Attachment 3).

The walkthrough began by observing EG4, an emergency generator that is still located onsite but is out of service. WMATA stated that the source has not operated since October 2019. The CNG fueling racks were observed with the FLIR camera. Emissions were observed from a vent on a compressor located within a small building. WMATA uses compressors to compress the pipeline natural gas to 4000psi and to maintain pressure in the system when buses are fueling. There are pressure relief devices for the system on top of the fueling rack roof. No emissions were observed from the pressure relief devices with the FLIR camera. EG5 is located in the CNG area and operates weekly for 20 minutes. The unit began operating during the inspection for its weekly maintenance. The hour meter on EG5 was observed at 638 hours. A bus was also observed at one of the CNG fueling racks with the FLIR camera. No emissions were observed during the fueling process.

The inspection team walked through the garage facility and observed the general maintenance and tire repair areas. No emission sources were observed in these areas. EG2 was observed. The source was not operating during the inspection. The hour meter was noted at 3.1 hours. WMATA representatives stated that the generator recently replaced an older generator and needs to be added to the permit as EG2. WMATA also stated that they conduct all maintenance on the emergency generators and do not use a third party.

A small hazardous waste satellite accumulation area was observed. The area contained three drums labeled hazardous waste with dates of 6/17/22, 7/5/22, and 8/20/22. WMATA stated that as a small quantity generator they can store waste for up to 180 days. The Bladensburg Site has a 5,000-gallon gasoline underground storage tank and a gasoline pump. The pump is used to fuel WMATA fleet vehicles. EPA requested records of the fuel throughput for the gasoline pump.

EPA conducted a slow speed ride through of the facility with the DART at 11:40AM. The ride through concluded at 11:43AM and no elevated VOC levels were detected.

The walkthrough concluded at 11:43AM.

IV. Records Review

EPA requested several records prior to the inspection (Attachment 1). During the inspection, WMATA provided copies of the following records:

- Date and amount (gallons) of each diesel and gasoline fuel delivery in 2021 and 2022.
- A list of each combustion source at the Bladensburg Site.
- List of current emergency generators at the Bladensburg Site.

EPA reviewed these records with WMATA during the opening conference. EPA requested records of CNG throughput for 2021-2022 during the inspection. On October 28, 2022, WMATA provided records of the hours operated monthly for EG5 from 2018-2022.

V. Closing Conference

After the records review, EPA inspectors and WMATA representatives had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final reports do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 11:55AM.

EPA did not identify any potential concerns while onsite.

VI. List of Attachments

- | | |
|---------------|--|
| Attachment 1: | Email correspondence to Basil Borisov of records requested to review during inspection |
| Attachment 2: | Photo Log |
| Attachment 3 | FLIR Video Log |

From: [Augustine, Bruce](#)
To: KLiebenberg@wmata.com; BBorisov@wmata.com
Subject: FW: EPA Inspection of WMATA Facilities
Date: Monday, October 24, 2022 6:29:00 AM

Karl and Basil,

I'm forwarding you an email that was sent to Claire Fox on Friday regarding a Clean Air Act inspection of two WMATA facilities on Tuesday October 25, 2022 by EPA. Please contact me at 215-814-2131 to discuss logistics.

Bruce J. Augustine
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From: Augustine, Bruce
Sent: Friday, October 21, 2022 11:41 AM
To: cfox@wmata.com
Cc: Joseph, Carly <Joseph.Carly@epa.gov>; Burger, Riley <burger.riley@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Bobbs, Nicholas <bobbs.nicholas@epa.gov>
Subject: EPA Inspection of WMATA Facilities

Ms. Fox,

I will leave you a voicemail also, but I wanted to let you know that EPA is planning to conduct a Clean Air Act inspection of two WMATA facilities on Tuesday October 25th. The facilities being inspected are the Bladensburg Facility in Washington DC and the 4 Mile Run facility in Northern Virginia. EPA will arrive at the Bladensburg Facility at 9AM and should arrive at the 4 Mile Run Facility at 1PM on the 25th. The inspection at each site will consist of an opening conference to discuss facility operations, a walkthrough of the facility, and a record review/closing conference. EPA will take photographs onsite and will also have a FLIR GF320 camera which can observe hydrocarbon emissions from sources onsite. In addition, EPA will have a mobile monitoring device that can detect VOC and other compounds.

The EPA inspection team will consist of the following:

1. Bruce Augustine
2. Carly Joseph
3. Riley Burger
4. Chris Williams
5. Nicholas Bobbs

Representatives from DDOE and VADEQ will be present for the inspections. Please let me know who at WMATA I should coordinate with for the onsite inspection and can you please let me know what PPE are required onsite.

EPA would like electronic copies of the following records:

1. For the Bladensburg and 4 Mile Run sites provide a list of each combustion source, including make and model.
2. For each combustion source provide the date the unit commenced construction, the date of manufacture, and the date the unit was installed at each site.
3. Provide copies of any performance tests that have been conducted on the source.
4. Identify any combustion or post-combustion emission controls on each unit.
5. The dates of each fuel delivery for 2021-2022 and copies of each fuel certification.

I can provide a file transfer site for WMATA to provide the records.

Bruce J. Augustine
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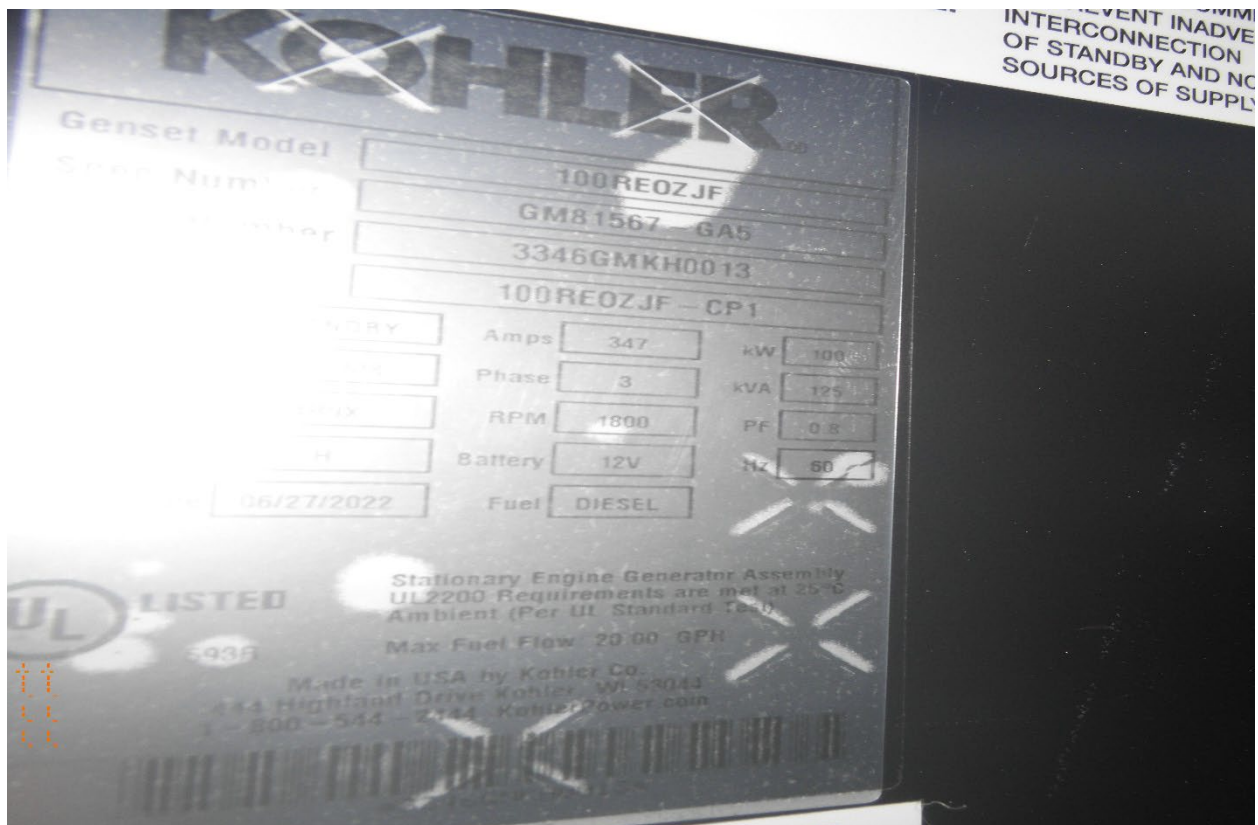
1. EG4: 200kW Cummins Generator – WMATA Bladensburg – 10/25/22



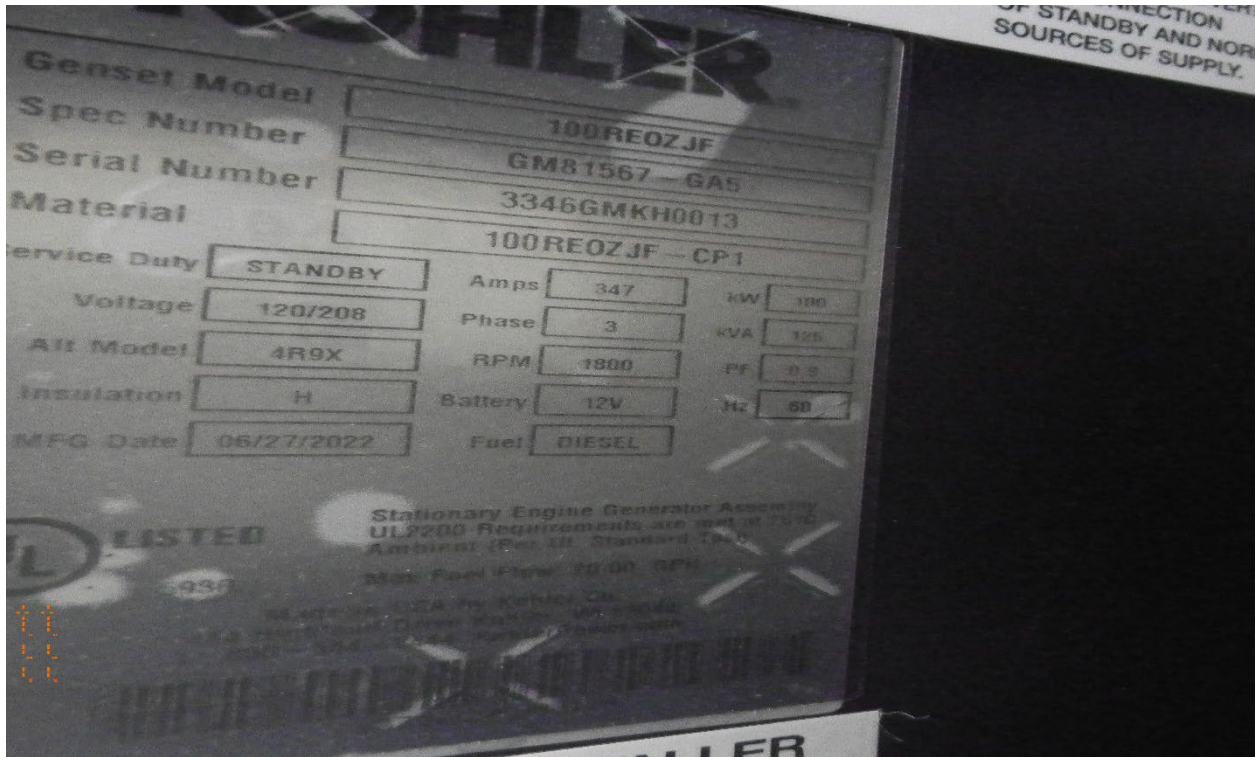
2. EG5: 1,500kW Caterpillar Generator – WMATA Bladensburg – 10/25/22



3. Natural Gas Compressor B – WMATA Bladensburg – 10/25/22



4. EG2: 100kW Kohler Generator (w/flash) – WMATA Bladensburg – 10/25/22



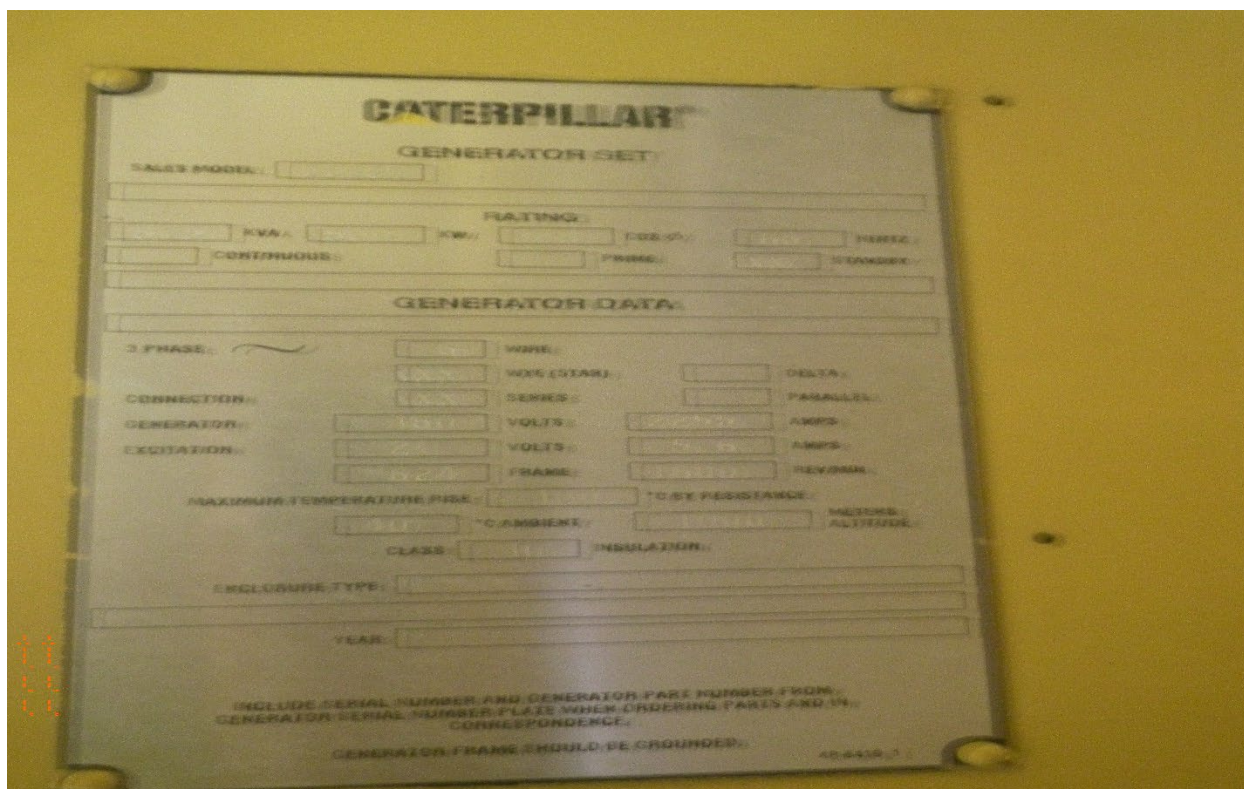
5. EG2: 100kW Kohler Generator (no flash) – WMATA Bladensburg – 10/25/22



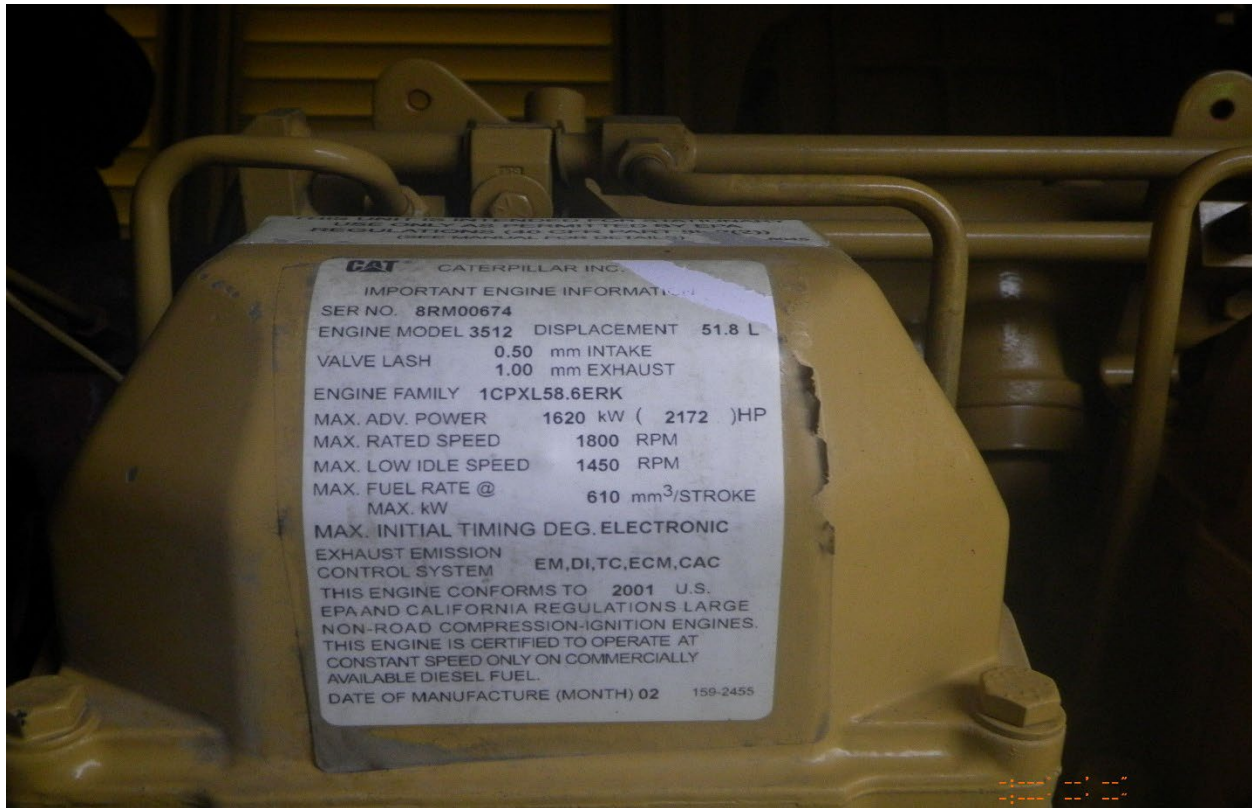
6. EG2: 100kW Kohler Generator – WMATA Bladensburg – 10/25/22



7. Hazardous Waste Accumulation Area – WMATA Bladensburg – 10/25/22



8. EG5: 1,500kW Caterpillar Generator Nameplate (blurry) – WMATA Bladensburg – 10/25/22



9. EG5: 1,500kW Engine Plate – WMATA Bladensburg – 10/25/22



10. Gasoline Fueling Pump – WMATA Bladensburg – 10/25/22

Attachment 3 – WMATA Bladensburg CAA Inspection FLIR Video Log October 25, 2022

FLIR Video Log		
Video Number	Description	File Number
1	Vent on compressor building	MOV_0198.mp4