



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Clean Air Act Inspection Report

Drafted: July 5, 2022

Finalized: July 5, 2022

EPA Inspector: Hannah Patel, Physical Scientist, Air Compliance Section /HHP/
Darren Fortescue, Senior Enforcement Coordinator, Air Compliance Section /DEF/

EPA Reviewer: Darren Fortescue, Senior Enforcement Coordinator, Air Compliance Section /DEF/

Date of Inspection: June 22, 2022

Facility Name: WGBH Educational Foundation, d/b/a GBH

ICIS Air ID#: MA0000002511902022

Facility Locations: 1 Guest Street, Boston, MA 02135,

Mailing Address: As above

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Inspection Attendees:

Name	Title	Organization
Darren Fortescue	Senior Enforcement Coordinator	EPA Region 1
Hannah Patel	Physical Scientist	EPA Region 1
David Price	Director of Facilities Services and Security	GBH
Daniel Murphy		GBH

Facility/Process Description:

History

The facility, located at 1 Guest Street, Boston MA is owned by WGBH Educational Foundation, d/b/a GBH. The facility occupies both sides of the street (1 Guest Street and 10 Guest Street) and is comprised of two buildings on either side that are connected through a concourse. The building located at 1 Guest Street was built by GBH in 2007, and the building located at 10 Guest Street was purchased by GBH in 2005. The president of the company is John Abbott, who has been in that role since 2007. GBH is an Educational Foundation that focuses on providing the public with television and radio content.

Processes

The building located at 1 Guest Street hosts television and radio studios that produce 38% of all the content produced for the Public Broadcasting Services. The production and broadcasting services are located on the first floor of the building, while a data center is located on the second floor.

The building located at 10 Guest Street is an office building that includes administrative services and production offices.

Generators

Located at 1 Guest Street is a Caterpillar generator; Model: 3512; Serial Number:1GZ02605; Type: Compression Ignition; Capacity: 1620 KW; Installation Date 2007.

Located at 10 Guest Street is a Caterpillar generator; Model: 3406; Serial Number:1DZ09545; Type: Compression Ignition; Capacity: 335 KW; Installation Date: 2007.

Number of Employees and Working Hours:

GBH employs approximately 1,100 people. Currently GBH is operating under COVID-19 protocols, which means that at any point in time there may be as few as 180 employees working onsite, while the rest work remotely. The facility's operating hours are 24/7; however only a skeleton crew remains onsite overnight.

Potentially Applicable Clean Air Act Requirements:

40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (“Subpart 4Z”)

Previous Enforcement Actions:

A “Detailed Facility Report” from EPA’s Enforcement and Compliance History Online database indicates that there have been no informal or formal enforcement actions taken against GBH in the past five years.

Opening Conference:Entry

On June 22, 2022, at 09:08 am, EPA Region 1 representatives Hannah Patel and Darren Fortescue arrived at GBH’s facility, located at 1 Guest Street, Boston, Massachusetts. They met David Price and Daniel Murphy of GBH. Mr. Fortescue presented his credentials and Ms. Patel initiated an opening conference.

Conference

Mr. Price said that both generators located at the facility are emergency generators. Mr. Price said that the generators are participating in a Demand Resource Program. Facility representatives said that GBH has a service agreement with CPower (Enerwise Global Technologies, Inc. d/b/a CPower) that facilitates this participation.

Mr. Price said that the generators are not operated for the demand response purposes very often. Mr. Price said that the total hours of non-emergency operation annually would be less than 20 hours, and that when participating in demand response, the generators ran for approximately 2 to 3 hours at a time.

Mr. Price said that the generators had been purchased from Milton CAT in 2006 and installed at the facility in 2007. Mr. Price said both the generators’ maintenance is routinely performed by Milton CAT. Mr. Price said that the fuel used for the generators is diesel.

Mr. Price said he did not know if the generators have control devices or if any stack testing has been performed.

Mr. Price said the facility runs the generators for 15 minutes every Monday to make sure they are operational.

Mr. Price said the facility does not have a site-specific monitoring plan for the generators and that he was not aware if any generator reports had been submitted to EPA. Mr. Price said GBH was submitting reports to MassDEP through Wood Consultants.

Facility Tour:

Mr. Fortescue, Ms. Patel, Mr. Price and Mr. Murphy conducted a tour of the facility.

Initially, the group inspected the generator located at the back of the building at 1 Guest Street. Ms. Patel took a picture of the engine nameplate. EPA representatives documented that the engine nameplate described the engine as a Caterpillar generator; Model: 3512; Serial Number:1GZ02605; with an electrical capacity of 1620 KW. Facility representatives said the generator had a non-resettable hour meter; however, the EPA representatives were unable to document the hours of operation from it at the time of the inspection.

The group proceeded to the generator located at the back of the building at 10 Guest Street. EPA representatives were able to take a picture of the engine nameplate. EPA representatives documented that the engine nameplate described the engine as a Caterpillar generator; Model: 3406; Serial Number:1DZ09545;with a capacity of 449 HP/335 KW.

Documents Reviewed:

Mr. Price provided the most recent maintenance reports from Milton CAT for both generators. The reports documented the hour meter readings for both generators as 392 for the 1 Guest Street generator and 371 for the 10 Guest Street generator.

Ms. Patel reviewed the maintenance reports provided and noted that fan pulley's, fan belts and coolant are being monitored on a routine basis. In addition, the reports described that monitoring of the fuel system, air system, oil and battery are included.

Closing Conference:

Ms. Patel and Mr. Fortescue thanked the facility representatives for their time.

EPA representatives said certain generators that participate in demand response programs are not considered emergency generators as a result of a vacatur of provisions that previously allowed for their participation. EPA representatives said that, as a result of participating in a demand response program, the generators located at the facility could be subject to the non-emergency provisions of Subpart 4Z. Mr. Fortescue recommended that GBH review Subpart 4Z.

Mr. Price said that the facility had not heard from CPower for a few years and that it is possible that the contract with CPower had expired.

Mr. Price was unable to provide copies of the contract with CPower at the time of the inspection and agreed to email them to EPA later.

Post Inspection:

On June 22, 2022, Mr. Price provided a copy of an executed Demand Response Master Service Agreement between GBH and CPower that was executed on September 14, 2016. Ms. Patel observed that the agreement appeared to document an end date of May 31, 2020.

Email correspondence between CPower and GBH, attached to a follow-up email from GBH, dated June 24, 2022, indicated that the generators located at the facility were pulled from the ISO-NE demand response programs because they didn't meet MA DEP non-emergency standards; however, the correspondence also indicated that the agreement is still active.