



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

Clean Air Act Inspection Report

Drafted: September 3, 2021

Finalized: September 14, 2021

EPA Inspectors: Davianna Vasconcelos, Environmental Engineer, Air Compliance Section /DMV/
Darren Fortescue, Environmental Engineer, Air Compliance Section
Hannah Patel, Physical Scientist, Air Compliance Section

EPA Reviewer: Christine Sansevero, Chief, Air Compliance Section /CMS/

Date of Inspection: August 31, 2021

Facility Name: Boston Properties, Inc. d/b/a Boston Properties

ICIS Air ID#: MA0000002511901864

Facility Location: 800 Boylston Street, Boston, MA 02199-8103

Mailing Address: 800 Boylston Street, Suite 1900, Boston, MA 02199-8103

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
Davianna Vasconcelos	Environmental Engineer	EPA Region 1
Darren Fortescue	CAA Inspector	EPA Region 1
Hannah Patel	Physical Scientist	EPA Region 1
Joe Bertoni	Regional Engineer	Boston Properties
Tracy Nicholson		Boston Properties

Dennis Carrafiello		C&W Services
Scott Durkin		C&W Services

Facility/Purpose Description:

History

The facility, commonly known as the Prudential Center, is located at 800 Boylston Street, Boston and is owned by Boston Properties, Inc. d/b/a Boston Properties (“Boston Properties”). The facility was formally owned by Prudential and was sold to Boston Properties in 1997.

Purpose

The Prudential Center houses over 60 stores and restaurants, over 4,000 parking spaces, and at least 19 floors of office space. Boston Properties maintains its headquarters and a regional within the Prudential Center.

Generators

Boston Properties owns and operates five generators at the facility, these generators are described in Table 1.

Table 1: Generators located at the facility.

Generator Name	Use	Manufacturer	Model	Serial No.	Type	Capacity (HP)	Manufacture Date	Hour Meter Reading
Tower 1	Emergency	Caterpillar	3512	24Z07131	CI	1818		595
Tower 2	Emergency	Caterpillar	3512	24Z07123	CI	1818		608
Retail	Emergency	Caterpillar	3512	24Z04247	CI	1818		446
Parking Garage	Emergency	Caterpillar	3412	81Z18652	CI	749		546
Fire Pump	Fire Pump	Caterpillar	NTA-855-F	56973	CI	400		233.5

Number of Employees and Working Hours:

Boston Properties employs over 100 employees. The facility is open to clients 24 hours per day, 365 days per year and open to the public from 6 a.m. to 8 p.m. on business days.

Potentially Applicable Clean Air Act Requirements:

40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (“Subpart 4I”)

40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (“Subpart 4J”)

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 Boston Properties in the past five years.

Opening Conference:

Entry

On August 31, 2021, at 9:05 am, EPA Region 1 representatives Davianna Vasconcelos, Darren Fortescue, and Hannah Patel arrived at the facility, located at 800 Boylston Street, Boston, Massachusetts. EPA representatives met Joe Bertoni, Tracey Nicholson, Dennis Carrafiello, and Scott Durkin in the hall in front of the tower entrance. Mr. Fortescue presented his credentials and Ms. Vasconcelos initiated an opening conference.

Opening Conference

Mr. Bertoni said the generators located at the facility do not participate in a demand-response program by either providing power back onto the grid or allowing the facility to operate as an island power location. Mr. Bertoni said that the facility does participate in a demand-response energy curtailment program that, when requested, uses activities such as turning off lights and adjusting the building temperature to lower the facility’s power demand.

Mr. Bertoni said the generators are only used to provide emergency stand-by power for common area lighting and elevators where necessary for safety and the building is not equipped to operate at full capacity in an emergency.

Mr. Bertoni said that source registrations for the generators had been submitted to the Massachusetts Department of Environmental Protection.

Mr. Bertoni said that the generators had previously been enrolled in a demand-response program; however, he said they had stopped participating in the program approximately 15 years ago.

Mr. Bertoni said that the generators use ultra-low sulfur diesel fuel, and the generators all have non-resettable hour meters.

Mr. Carrafiello said preventative maintenance is routinely performed on the generators and a computerized tracking system is used to keep records of the maintenance performed. Mr. Carrafiello said that the computerized tracking system is also used to log when generators are operated.

Ms. Nicholson said that, upon request, specific generator information could be supplied by email after the inspection.

Facility Tour:

Mr. Bertoni, Mr. Carrafiello, and Mr. Durkin led Ms. Vasconcelos, Mr. Fortescue, and Ms. Patel on a tour of the facility. During the tour, Mr. Fortescue took pictures of each of the generator nameplates. All photographs are in the inspection file.

The group proceeded to a room containing a generator that Mr. Bertoni said was the emergency generator for the retail space. EPA representatives documented, from the nameplate, that the generator was a Caterpillar; Model No.: 3512; Serial No.: 24Z04247; Capacity: 1818 HP (1356 kW). EPA representatives documented that the generator's non-resettable hour meter read 446 hours.

The group proceeded to a second room containing two generators that Mr. Bertoni said were the emergency generators for the office space located in the tower. EPA representatives documented, from the nameplate, that the first generator was a Caterpillar; Model No.: 3512; Serial No.: 24Z07131; Capacity: 1818 HP (1356 kW). EPA representatives documented that the first generator's non-resettable hour meter read 595 hours. EPA representatives documented, from the nameplate, that the second generator was a Caterpillar; Model No.: 3512; Serial No.: 24Z07123; Capacity: 1818 HP (1356 kW). EPA representatives documented that the second generator's non-resettable hour meter read 608 hours.

The group proceeded to a third room, that Mr. Bertoni said contained a fire pump. EPA representatives documented, from the nameplate, that the generator for the fire pump was a Cummins; Model No.: NTA-855-F; Serial No.: 56973; Engine No.: 11407445; Capacity: 400 HP. EPA representatives documented that the fire pump generator's non-resettable hour meter read 233.5 hours.

The group proceeded to a fourth room containing a generator, that Mr. Bertoni said was the emergency generator for the parking garage. EPA representatives documented, from the nameplate, that the generator was a Caterpillar; Model No.: 3412; Serial No.: 81Z18652; Capacity: 749 HP (558.5 kW). EPA representatives documented that the generator's non-resettable hour meter read 546 hours.

Closing Conference:

Ms. Vasconcelos, Mr. Fortescue, Ms. Patel, and Mr. Bertoni attended the closing conference.

The EPA representatives thanked the Boston Properties representatives for their time.

The EPA representatives explained that generators can be subject to various regulations including Subpart 4I, Subpart 4J and Subpart 4Z. The specific regulations that a generator may be subject to, depends on a variety of factors including the type of facility at which the generator is located and the generator's fuel type, capacity, and data of manufacture. Mr. Fortescue recommended that Boston Properties review the potentially applicable regulations.

Ms. Vasconcelos said she would send a follow-up email detailing the information Boston Properties had agreed to provide, which included the following:

- The registered legal name for Boston Properties;
- Manufacture dates of the generators; and
- Official titles for attendees of the Opening Conference.

EPA representatives left the facility at 10:15 am.