



Region 2 Enforcement & Compliance Assurance Division
Air Compliance Branch
CAA Inspection Report

Inspection Date: 6/13/2023
Facility Name: The Ritz-Carlton
Facility Address: 6900 Great Bay, St. Thomas USVI 00802
ICIS-Air ID #: VI0000007800500051
Facility Contact: Donny Dominique (340)690-6572
EPA Lead Inspector: Katherine G. Marmanides
EPA Asst. Inspector: Victor Tu
State Inspector(s): State inspector name, title, phone number.
Other Inspector(s): Other inspector name, title, phone number.

Pertinent Regulatory Requirements

The Ritz-Carlton is operating with a Title V permit and is a major source for NOx.

Ritz-Carlton is subject to the following are federal regulations:

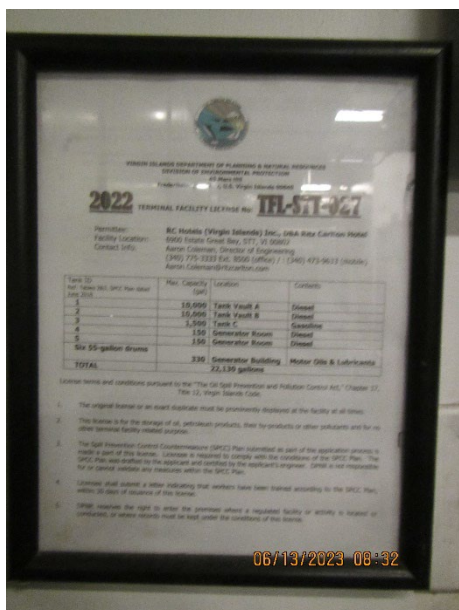
- NSPS Standards of Performance for Stationary Compression Ignition Internal Combustion Engines – 40 CFR Part 60 Subpart IIII
- NESHAP for Stationary Reciprocating Internal Combustion Engines - 40 CFR 63 Subpart ZZZZ

Summary of Observations

On June 13, 2023, EPA inspectors Victor Tu and Katherine Marmanides arrived at The Ritz-Carlton around 9 AM. It was 85 degrees and sunny. We stopped by the front guest services desk and asked for Donny and were met by Roxanne who told us that Donny was busy at the time. She introduced us to Karney Charles who was the Engineering Supervisor. He took us to the operating room where he showed us their logbooks for the 2 generators. Most of the months were filled in intermittently from September 2021 to June 2023. At the time of the inspection, generator #1 was on standby while generator #2 was operating. We asked him to email us copies of their logbooks.

Generator #2:
RIMCO - 4225kVolts, power factor -.89, amps 186, kW 1225

On the wall located near the entrance was a 2022 Terminal Facility License. (Picture below)



Shortly thereafter, Mr. Charles realized he was not knowledgeable about the air permit and stated that we had to come back at 1 PM to meet with Donny. At the time, Donny was in a meeting, and he was the only one that was knowledgeable about the air permit. We left at 10:45 AM.

We returned at The Ritz-Carlton around 12:45 PM. We notified the front guest services of our arrival. We also called and texted Donny and Karney about our arrival.

When Donny arrived, we explained that we were from the U.S. EPA Region 2 NYC office, and we were there to conduct an unannounced Clean Air Act inspection. Donny took us back to the operating room where he showed us more logbooks. He stated that there was no communication from DPNR with the status of their new permit, since 2021. They also don't have a copy of their new 2023 Terminal Facility License but stated that they did submit payment and would email us the copy of the receipt. Donny stated that they need to complete a daily Method 22 visible emission reading and that their only observer left in April 2023 but was never replaced. No one else was ever trained/certified to continue Method 9 visible emissions. Donny stated that if he wasn't available to log into the logbooks, they were not completed. He stated that they paid for their renewal of their Title V permit back in 2021 but never received a copy of their new permit.

While in the operating room, Donny showed us a logbook for their Fulton boiler, and stated that they have two (2) boilers onsite. He stated that they used the same book to log boiler operations but didn't distinguish between them in the book.

Donny stated that The Ritz-Carlton generates their own electricity and uses WAPA only as backup.

2018 (newer) Fulton boiler - #F1019773A, model #VMP100, 3.347MM BTU/hr, propane. Fuel meter read: 2584 x100 cu ft. (Picture below)



Fulton boiler – model #VMP100, 1.66MM BTU/hr, propane. Fuel meter read: 43054 x100 cu ft. (Picture below)



Generator #2 – 3,142,656-gal, 88.50 gal/hr
Generator #1 – kWh 17196559, kVAh 9485241, 771.4 gal for the month.

There were trenches next to the generators that were full of waste oil. A company comes (scheduled for Friday 6/16/2023) to suck it all out of the trench. The waste is mostly oil and diesel. Everything in the room gets cleaned off into the trenches.

Next, we went to look at the dryers. All 5 dryers are gas (propane) dryers.

Dryer 4 – Challenger CPG2.07.038C, 2.2MM BUT/hr. The fuel meter is stationed 20ft high and the mechanic in the laundry room was climbing up at the time to read the meter. Manufacture date: 8/15/2006.

Dryer 3 – Challenger CPG2.07.017A, 2.2MM BTU/hr. Manufacture date: 5/17/2000.

Dryer 5 – G.A. Braun Inc. 300PT-PGE, 2.8MM BTU/hr. Hour meter: 6957

Two (2) smaller Cissell dryers:

Cissell, Model # H0175G, Serial # 2612020346; 450,000 Btu/hr

Cissell, Model # H0175G, Serial # 2612020344; 450,000 Btu/hr (Picture below)



We went outside to see the stack and it was enclosed to blend in with design of the other roofs. There was no emission visible.

We concluded the facility tour with going back to Donny's office which was near the operation room. We listed the documents below to be sent no later than June 27, 2023. We concluded the inspection at 3:30 PM.

Requested Documents:

Generator logbooks

2023 Terminal Facility License

Boiler logbooks

Previous Title V Permit

Draft of new Title V Permit

Dryer logbook

Dryer 5 amendment & application

Annual emission statements 2021/2022

Proof of Title V emission fees paid 2021/2022

Sulfur content logs

Title V permit application

Lead Inspector's Name: Katherine G. Marmanides

7/11/2023

X Katherine G. Marmanides

Lead Inspector

Signed by: Environmental Protection Agency

Assisting Inspector's Name: Victor Tu

7/11/2023

X Victor Tu

Assisting Inspector

Signed by: VICTOR TU

Supervisor's Name: Harish Patel

7/12/2023

X Harish Patel

Supervisor

Signed by: Environmental Protection Agency