



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Clean Air Act Inspection Report

Drafted: September 7, 2021

Finalized: September 15, 2021

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

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

Date of Inspection: September 2, 2021

Facility Name: Congruity 360, LLC

ICIS Air ID#: MA0000002512001207

Facility Location: 456 Bedford Street, Fall River, MA 02720

Mailing Address: 456 Bedford Street, Fall River, MA 02720

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
Hannah Patel	Physical Scientist	EPA Region 1
Darren Fortescue	CAA Inspector	EPA Region 1
Davianna Vasconcelos	Environmental Engineer	EPA Region 1
Steven Brabant	Facilities Manager	Congruity 360, LLC

Facility/Process Description:

History

The facility, located at 456 Bedford Street, Fall River MA, is owned and operated by Congruity 360, LLC (“Congruity 360”). The facility was built approximately 175 years ago and was originally a cotton mill. It then became a spandex manufacturing facility. In 2008, the facility was purchased by Granite Block Data Center Inc. Between 2008 and 2012, Granite Block Data Center Inc. developed the facility into a data center. In 2012, the facility was purchased by MSDI. MSDI merged with Rockland IT Solutions to form Congruity, which then became Congruity 360.

Processes

The facility operates as a data center to provide space, power, and connectivity to support cloud usage. The facility is currently operating at approximately 20% capacity. The facility consists of 4 major rooms essential for continuous operation.

The Data Center houses servers and data storage to support the services that Congruity 360 supplies to various customers. The servers are located inside secure lockers that are protected by ceiling and floor security systems. The Data Center has five cooling systems, consisting of chillers and cooling towers, used to maintain an appropriate operating temperature for the servers.

The Carrier Room houses equipment that provides connectivity to support cloud and internet usage. There are several fiberoptic lighting points located in the Carrier Room that provide internet connection for various communications customers, including Verizon, Comcast and Crown Castle.

The Uninterrupted Power Supply (“UPS”) Room houses equipment capable of continuously operating two separate 750 KW power grids, Grids A and B. The facility has the capacity to receive two shore power lines to feed each grid; however, there is currently only one connected to the facility. There are two 750 MW UPS systems located in the UPS Room. As there is only one shore power line connected. Only one UPS can operate at a time, limiting the current facility power capacity to 750 MW.

The facility has two generators located in the Generator Room that provide backup emergency power if the capacity of the UPS systems is exceeded. Similarly, to the UPS system limitation, only one generator is currently able to supply emergency power to the facility at a time.

Generators

The generators located in the Generator Room are:

- Generator A: Caterpillar; Model SR-5; Engine Number: 3516C; Serial Number: SBJ0212J9; Engine Family: ACPXL78.1T2Y; Type: Compression Ignition (“CI”); Capacity: 2937 Hp; Manufacture Date: 2010.
- Generator B: Caterpillar; Model SR-5; Engine Number: 3516C; Serial Number: SBJ0212J0; Engine Family: ACPXL78.1T2Y; Type: CI; Capacity: 2937 Hp; Manufacture Date: 2010.

Number of Employees and Working Hours:

Congruity 360 employs 77 people across 5 locations domestically and 3 locations abroad. A mix of security personnel and operations management (15 to 22 people) work at the Fall River location. The facility and equipment operate 24 hours per a day, 365 days per year.

Potentially Applicable Clean Air Act Requirements:

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

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 Congruity 360 in the past five years.

Opening Conference:

Entry

On September 2, 2021, at 9:34 am, EPA Region 1 representatives Hannah Patel, Darren Fortescue, and Davianna Vasconcelos arrived at the Congruity 360 facility, located at 456 Bedford Street, Fall River MA and met Steven Brabant of Congruity 360. Ms. Patel, Mr. Fortescue and Ms. Vasconcelos signed in, Mr. Fortescue presented his credentials and Ms. Patel initiated an opening conference.

Conference

Mr. Brabant said the facility participates in ISO New England's Active Demand Capacity Resource Program. Mr. Brabant said Congruity 360 has a contracted service agreement with Enel X, an energy consulting company based in the Northeast that facilitates the participation in the Active Demand Capacity Resource Program.

Mr. Brabant said the Congruity 360 facility located in Fall River has source registration with the state of Massachusetts.

Mr. Brabant said that when the facility is actively participating in the Active Demand Capacity Resource Program, it steps off the grid and supplies its own power. Mr. Brabant said the generators are not used to supply energy back to the grid.

Mr. Brabant said he would provide a copy of the Certificate of Conformity for the generators via email after the inspection.

Mr. Brabant said that Congruity 360 is following the manufacturer's written operation and maintenance instructions for the generators, and that a contractor performs routine preventative maintenance in accordance with those instructions. Mr. Brabant said he would provide a preventative maintenance report via email after the inspection.

Mr. Brabant said the generators have non-resettable hour meters and the facility logs when they are run. Mr. Brabant said that the generators have not been modified.

Mr. Brabant said that due to the current power configuration of the facility, only Generator A is currently being used to supply facility power in emergency situations. Mr. Brabant said that as a result of the power configuration, the hours on the hour meter for the Generator B are low compared to those for Generator A. Mr. Brabant said that the generators both have the capacity to run at 750KW when needed.

Mr. Brabant said the generators use ultra-low sulfur diesel ("ULSD"), supplied by Columbus Energies Inc. Mr. Brabant said he would supply a fuel invoice or certification verifying that the fuel sulfur content is at or below 15 ppm via email after the inspection.

Facility Tour:

Mr. Brabant led Ms. Vasconcelos, Mr. Fortescue, and Ms. Patel on a tour of the facility. During the tour, Mr. Fortescue took pictures of the nameplates and emissions labels for the generators located in the Generator Room. All photographs are in the inspection file. The group toured the Data Room, Carrier Room and UPS Room.

The Group then entered the Generator Room to inspect the generators located inside.

The EPA representatives observed a generator that Mr. Brabant said was Generator A. The EPA representatives documented the generator specifications from the name plate . EPA representatives documented that the emissions label described that the generator conforms to 2010 US EPA and California regulations for large non-road and stationary compression ignition engines. EPA representatives noted that the hour meter for Generator A read 302.1 hours.

The EPA representatives observed a second generator that Mr. Brabant said was Generator B. The EPA representatives documented the generator specifications from the name plate. EPA representatives documented that the emissions label described that the generator conforms to 2010 US EPA and California regulations for large non-road and stationary compression ignition engines. EPA representatives noted that the hour meter for Generator B read 21.6 hours.

Mr. Brabant said each generator has a hockey puck silencer installed.

Closing Conference:

Ms. Patel, Mr. Fortescue and Ms. Vasconcelos thanked Mr. Brabant for his time.

Ms. Patel said that due to the manufacture date, that EPA representatives had observed on the generator labels, the generators are likely subject to Subpart 4I. EPA representatives recommended that Congruity 360 review Subpart 4I.

Ms. Patel said that she will be writing a report describing observations made during the inspection and that the report will be sent to Congruity 360. Ms. Patel detailed the following information that Mr. Brabant had agreed to provide post inspection, including the following:

- The number of employees employed by Congruity 360;
- A fuel invoice or certification that documents the sulfur content of the ULSD used at the facility;
- A routine preventative maintenance report for the generators;
- The Certificate of Conformity for the generators; and
- The number of hours, annually, that the generators had participated in demand response for the last 2 years.

The EPA representatives left the facility at 11:02 AM.

Post Inspection:

Ms. Patel emailed Mr. Brabant the EPA Small Business Resource Information Sheet.

Mr. Brabant provided the requested information via email on September 2, 2021.