



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Clean Air Act Inspection Report

Drafted: June 8th, 2023

Finalized: June 8, 2023

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

EPA Reviewer: Darren Fortescue, Section Chief, Air Compliance Section /DEF/

Date of Inspection: April 18th, 2023

Facility Name: Warwick Sewer Authority

Mailing Address: 125 Arthur W. Devine Blvd., Warwick, RI 02886

Facility Location(s): Same as above

ICISAir ID#: RI0000004400300808

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	Environmental Scientist	EPA Region 1
Davianna Vasconcelos	Environmental Engineer	EPA Region 1
Michael Bedard	Assistant Superintendent	Warwick Sewer Authority
Charles Labbe		Warwick Sewer Authority

Facility/Purpose Description:History

Warwick Sewer Authority was created in 1962 by the City of Warwick. In 1965, the treatment facility was constructed and brought online.

Purpose

Warwick Sewer Authority processes 4.5 million gallons of wastewater a day through bacterial action and chemical processes. Currently the Warwick Sewer Authority operates 49 pump stations across the city of Warwick. Major upgrades were started in 2001 and an advanced treatment system was put in 2016.

Generator

Warwick Sewer Authority owns and operates a stationary, compression ignition Caterpillar generator; Model: 3512; Engine Family: ACPXL58.6T2X; capacity 2206 horsepower; Manufactured in 2010.

Number of Employees and Working Hours:

Warwick Sewer Authority employs approximately 30 employees. The facility operates 24 hours per day, 7 days a week.

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 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 has been no enforcement action taken in the last 10 years.

Opening Conference:

Entry

On April 19, at 9:05 AM, EPA Region 1 inspectors Hannah Patel and Davianna Vasconcelos arrived at the Warwick Sewer Authority facility located at 125 Arthur W. Devine Blvd, Rhode Island, 02886. EPA inspectors met with Michael Bedard and Charles Labbe of Warwick Sewer Authority. Ms. Patel and Ms. Vasconcelos presented their credentials and initiated an opening conference.

Opening Conference

Ms. Patel said that the inspection would primarily focus on stationary generators located at the facility. Ms. Patel said that if any of the information supplied during the inspection is considered confidential business information (“CBI”), then Warwick Sewer Authority should let EPA know. Mr. Bedard said that they did not believe that information relating to the stationary generator would be considered CBI.

Ms. Patel asked how many stationary generators are located at the facility and Mr. Bedard said there is one.

Ms. Patel asked if the generator is used for non-emergency purposes and Mr. Bedard said that is only used for emergencies. Ms. Patel asked if the generator is involved in a demand response program or in a program in which the Sewer Authority would be financially compensated for their use. Mr. Bedard said that the generator was enrolled in a demand response contract with CPower. Ms. Patel and Ms. Vasconcelos explained that if the generator is used in a demand response program, then it is not considered an emergency generator. Mr. Bedard said they would contact CPower and find out more about what their generators are certified for. Ms. Patel noted that the generator log showed that it ran for 45.5 hours this year and 18 hours through the demand response program. Mr. Bedard said weekly generator checks are conducted.

Ms. Patel asked if Warwick Sewer Authority could provide maintenance records, run logs, and fuel invoices for the engine. Mr. Bedard provided copies of fuel invoices showing records of No2 diesel fuel used for the generator in addition to purchase records. Additionally, Mr. Bedard provided a run log for the generator.

Ms. Patel asked if Warwick Sewer Authority has a copy of the Certificates of Conformity (“CoC”s) for the generator on site. Mr. Bedard said Warwick Sewer Authority would provide this information after the inspection.

Facility Tour:

Mr. Bedard led Ms. Patel and Ms. Vasconcelos to the stationary generator.

While walking to the stationary generator Ms. Vasconcelos observed several portable generators on site. Ms. Vasconcelos asked if the portable generators are used on site, and Mr. Bedard said that the portable generators are used at pump stations and other sites as needed. EPA inspectors continued to the stationary generator. Ms. Vasconcelos took pictures of the generator, available nameplate, and emissions label. Ms. Patel observed that the emissions label certifies the engine conforms to 2010 EPA engine standards. The engine is certified to comply with non-emergency service. Ms. Vasconcelos noted the digital run meter on the generator read 481.9 hours. All photographs and the accompanying photo log are in the inspection file.

Closing Conference:

Ms. Patel initiated a closing conference.

Ms. Patel asked for clarification about the terms of the demand response program that Warwick Sewer Authority was involved with regarding CPower. Ms. Patel asked again about the demand response program and explained that a demand response program typically includes a contract between a facility and the electrical provider, or broker, that then requires the facility to turn on generators to limit a facility's electrical draw from the grid, or to provide electricity back onto the grid, in return for financial compensation. Warwick Sewer Authority confirmed they would speak to CPower about the use of the generators in the program and get clarification on the operation.

Ms. Patel said that generator located at the facility is likely subject to either Subpart 4Z and/or Subpart 4I. EPA inspectors said that the specific regulations a generator may be subject to depends on a variety of factors including the generator's fuel type, capacity, and data of manufacture. Ms. Patel recommended that Warwick Sewer Authority review the potentially applicable regulations.

Ms. Patel requested that Mr. Bedard provide the following documents via email after the inspection:

- Certificates of Conformity; and
- Copy of the Demand Response contract.

EPA inspectors thanked Mr. Bedard and Mr. Labbe for their time. EPA inspectors left the facility at 11:30 AM.