



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of Armed Forces Retirement Home
Inspection Date(s): 02/02/2023
Regulatory Program(s): NESHAP, MACT, NSPS

Company Name: Armed Forces Retirement Home
Facility Name: Armed Forces Retirement Home
Facility Location: 3700 North Capital Street NW
Washington, D.C. 20317
Latitude: 38.936555 **Longitude:** -77.006885
County/Parish: Washington D.C.

AFS Number: DC0000001100100011
Permit Number: 017-R3-A1
NAICS Code: 62331 **SIC:** 8059
Unique Project #: 3E23CA018A

Facility Representatives:

Point of Contact

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Troy Phillips, Facilities Maintenance Project Manager	☐
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Sunhee Park, EA Engineering	☐
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Patrick Benjamin, Campus Operations	☐
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Ryan Insley, Environmental Engineer, DOEE
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EPA Lead Inspector

Signature

Carly Joseph

Date

EPA Region III Environmental Center- Suite 5350
701 Mapes Rd (3ED21)
Ft. Meade, MD 20755-5350

Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Armed Forces Retirement Home (AFRH or Facility) to verify compliance with applicable state and federal regulations. The Department of Energy and Environment (DOEE) was notified of the inspection on January 18, 2023, via email. On January 31, 2023, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Susan Bryhan, the Facility's Administrator, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

A. Summary of the Facility

The Facility is located at 3700 North Capital Street NW, Washington, D.C. 20317. As stated on the company's website (<https://www.afrh.gov/>), "Armed Forces Retirement Home is the nation's premier life community for certain retired and former members of America's armed forces and their spouses".

The Facility received a Title V Operating Permit (Permit Number 017-R3-A1) from DOEE issued on January 24, 2018. AFRH applied for a synthetic minor permit in 2023 requesting an enforceable propane limit to lower the Facility's NOx emissions

Armed Forces Retirement Home is classified as major source for NOx. The Facility is subject to or potentially subject to the following federal regulations:

- 40 C.F.R. Part 60 Subpart IIII: New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (NSPS 4I)
- 40 C.F.R. Part 60 Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS 4J)
- 40 C.F.R. Part 63 Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT 4Z)

B. Inspection Opening Conference

At 9:10 AM on February 2, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Armed Forces Retirement Home was represented by Susan Bryhan, Facility Administrator; Troy Phillips, Facilities Maintenance Project Manager; Sunhee Park, Engineer; and Patrick Benjamin, Campus Operations. In addition to the EPA Region III inspectors, Tesfai Atakilti and Ryan Insley, from DOEE were present for the opening conference. EPA inspectors, Carly Joseph and Kim Laufenberg, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the Facility representatives of their right to claim any confidential business information (CBI). At that time,

Susan Bryhan did not claim any photos or documentation obtained during the inspection as CBI. Susan Bryhan submitted the signed CBI form to EPA via email on February 9, 2023.

II. Site Activity/Process Description

Riggs Farmland originally occupied the land before AFRH acquired the property. AFRH is currently comprised of 272 acres but once occupied over 500 acres. The land is currently shared with a Catholic University, a D.C. Charter School, and two chapels. Multiple parts of the campus are considered historical such as the Lincoln Cottage. The Facility consists of several buildings including: Scott Building, which was built in 2013; Sheridan Building, which was built in the 1960's and renovated in early 1990; Headquarters Building, which is partially rented out to the Catholic school; Security Building; and a Power Plant, which is no longer operational. The Facility also contains of a golf course and several ponds.

AFRH was established in 1851 as the Old Soldiers' Home. AFRH consists of two campuses: one in Washington D.C. and the other in Gulfport, Mississippi. The Facility is a Continuing Care Retirement Community only for enlisted duty retirees, injuries, and their spouses. Residents pay a fee based on their salary. In 1991, the AFRH became an independent Federal Agency funded from enlisted men and women serving in the U.S. Armed Forces and a trust fund that has operated since the AFRH was established. Congress allocates and Department of Defense (DOD) has oversight of these funds.

The Facility provides four levels of care: independent living, assisted living, memory support, and long-term care. There are currently 214 residents. The campus can support up to 500 residents with rooms of approximately 300 square feet each. All the food is cooked and prepared for residents in the Scott Building. AFRH has approximately 155 employees consisting of both health care providers and security. There are three shifts available, with employees generally working 5 days per week from 6:30 AM - 4:00 PM.

The Facility operates several boilers, emergency generators, and fuel tanks. There are currently 14 boilers, 5 emergency generators, and 5 fuel storage tanks used on-site. By building, the units were discussed and broken down below:

- Scott Building
 - 2 Emergency Generators (B13 & B14)
 - 1 Propane Fuel Storage Tank (C23, 12,000-gallons)
 - 2 Comfort Heat Boilers (A26 & A27)
 - 3 Domestic Water Heaters (A37-A39)
- Sheridan Building
 - 1 Emergency Generator (B5)
 - 2 Fuel Storage Tanks (C22 – propane, 12,000-gallons; C11 – diesel, 600-gallons)
 - 6 Domestic Water Heater (A28 - A33)

- North Converter
 - 3 Domestic Water Heaters (A34 - A36)
- Sherman Building
 - 1 Emergency Generator (B11)
 - 1 Diesel Fuel Storage Tank (C21, 500-gallons)
- Security Building
 - 1 Emergency Generator (B12)
 - 1 Diesel Fuel Storage Tank (C15, 110-gallons)
- Eagle Gate
 - 1 Emergency Generator (B15)

The Facility representatives noted there are no newly installed units at AFRH, since 2019, and the emergency generator, B12, was decommissioned in 2017. The Facility also mentioned previous deviations including losing a feeder for five hours which affected the operation of the emergency generators (B13, B14, and B15). Propane is only to be used for alternative fuel testing. For regular maintenance and testing at AFRH, stack tests were conducted on emergency generators (B13 and B14) on October 31, 2022 and November 1, 2022, which was recently submitted to DOEE. Inspections of all the boilers are conducted annually. Operational hours for the emergency generators are logged and tracked via Excel utilizing the hour meters. Maintenance on the generators is completed by a 3rd party contractor. AFRH utilizes a checklist for the both the monthly generator and tank inspections. The Facility monitors the double-walled tank levels utilizing a monitor and the MyTank program.

The opening conference concluded at 10:07 AM.

IV. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:10 AM by Sunhee Park and Patrick Benjamin of Armed Forces Retirement Home. Tesfai Atakilti and Ryan Insley of DOEE were also present for the walkthrough. EPA inspectors noted Kim Laufenberg would take photos during the Facility walkthrough (Attachment 2).

The inspection team began the walkthrough by exiting the meeting room located in Scott Building and taking an elevator to the fourth floor. The team observed natural gas fired emergency generator, B13, with 331 hours as indicated on its hours meter and B14 with 276.7 hours. Next, the inspection team observed boilers A26, A27, A37, A38, and A39 located on the fourth floor of Scott Building. Units A26 and A27 were noted to be comfort heat boilers, while units A37- A39 were comfort heating domestic hot water boilers. The inspection team then took the elevator to the first floor of the Scott Building and went outside to observe a 16,000-gallon underground propane tank. Water was seen over top the 16,000-gallon underground storage tank.

Inspectors were unable to view the tank's identification label/plate. Patrick Benjamin indicated the accumulation of water was likely due to the recent rain events in the area. The inspection team then proceeded to the Sheridan Building to observe the boiler room. Inspectors viewed six boilers (A28-A33) which AFRH utilizes for comfort heat. Walking outside the Sheridan Building, C22, a 16,000-gallon underground propane tank was observed. Again, the identification label/plate for the unit could not be located. The inspection team then observed emergency generator, B5, which was observed to have 264.9 hours indicated on its hours meter.

The inspection team walked over to North Converter Building and observed comfort boilers, A34- A36. The inspection team continued to outside the Administrative Building where the emergency generator, B11, was observed. 3,598 hours was noted from hours meter. Next, the inspection team observed a 500-gallon diesel tank. Lastly, the inspection team observed the emergency generator, B12, with 240.2 hours indicated on its hours meter. It was stated the unit was decommissioned in 2017. EPA inspector, Kim Laufenberg, inquired whether there were any plans of removing B12 in the near future. Patrick Benjamin (AFRH) and Tesfai Atakilti (DOEE) indicated there are currently no plans of removing the unit from the campus.

The walkthrough concluded at 11:47 AM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 11:50 AM. EPA inspectors reviewed documents requested in the January 31, 2023, email to Susan Bryhan (see Attachment 1). Some records were provided at the time of the inspection by Sunhee Park. Below are the records requested and what was provided:

1. Provide a copy of the most recent Title V Permit issued by DOEE. *Electronic copy dated August 30, 2021, submitted via email 2/9/2023.*
2. Provide a hardcopy and electronic copy of a Facility plot plan which identifies the process units and associate emission points. *AFRH provided a hard copy of the Facility plot plan on 2/2/2023. Site map also submitted electronically via email on 2/9/2023.*
3. See the attached Excel spreadsheet related to all combustion sources at the Facility such as generators and boilers ('Combustion Unit' tab), which can be used to provide the following information. *Completed Excel Spreadsheet provided copies of logs including operating hours and fuel consumption amounts provided for years 2019 to 1st half of 2022 via email on 2/9/2023.*
 - a. For each engine and/or boiler identified, provide:
 - i. Unit description(s),
 - ii. Make and number numbers,
 - iii. Location of source(s),
 - iv. Dates of installation (and potential removal),
 - v. Fuel(s) combusted,
 - vi. Applicable regulation(s),

- vii. Emission control(s),
 - viii. Maximum heat input rating (MMBtu or kW/hr);
- b. Additionally, for each combustion source at the Facility (including boilers, emergency generators, fire pumps, etc.) on a monthly basis for the past 4 years, include:
 - i. Hours of operation (hrs);
 - ii. Amount of fuel combusted (gallons, MSCF, etc.).
- 4. See the attached spreadsheet, 'Stack Test' tab, which can be used to provide the following information. For each combustion unit provide the following information on any performance test completed in the past 4 years: *Electronically submitted Stack Test Report for Units B13 and B14 tested October 31, 2022, and November 1, 2022.*
 - a. Date of each test,
 - b. Test method(s) utilized,
 - c. Each pollutant tested and the emission result (lb/hr, ton/yr, etc.), and
 - d. Identify if the test was conducted for informational purposes or to determine compliance.
- 5. Identify any combustion units which are equipped with continuous emission monitoring systems (CEMS). See the 'CEMS' tab of the attached Excel spreadsheet which can be used to provide the following information. For each unit that has a CEMS, provide: *Not provided and stated as not applicable to AFRH.*
 - a. The date the CEMS was installed,
 - b. Pollutants monitored, and
 - c. Date of last relative accuracy test (RATA).
- 6. For each fuel tank (gasoline and propane), provide:
 - a. Manufacturer specifications and design drawings,
 - b. Monthly fuel throughput amounts (gallons) for the past 4 years,
 - c. Leak records (testing and deviations) for the past four years.
- 7. Each exceedance of a permit condition for the past 4 years containing the following details: *Stated as not applicable to AFRH. Reported no exceedances.*
 - a. Subject source,
 - b. Time and date,
 - c. Cause,
 - d. Duration,
 - e. Estimated rate of emissions, and
 - f. Proposed corrective action.
- 8. Provide calculations of the potential to emit (PTE) for NO_x, SO₂, VOCs, PM, and HAPs for each combustion unit and facility wide along with supporting calculations for the previous 24 months (lbs/hr). These calculations should include each emission factor and its derivation (e.g., stack test, CEMS, AP-42, etc.). *Submitted PTE calculations updated in 2023 for AFRH's synthetic minor permit application via email on 2/9/2023.*
- 9. Provide copies of any emission statements submitted to DOEE for 2019 through 2023 including emissions of NO_x, SO₂, PM, VOCs, and HAPs. Also, provide calculations for the actual emissions generated and reported. *Provided plant wide emission calculations for years 2019-2021 via email on 2/9/2023.*

10. Provide copies of any enforcement actions issued to Armed Forces Retirement Home by either EPA or DOEE for the past 4 years. *Provided enforcement documents relating to an Administrative Order: DOEE-A-50001680 issued on 11/10/2021 for failure to conduct timely stack test. Records were provided electronically via email on 2/9/2023.*
11. Provide copies of any initial notifications or notifications of compliance status submitted to EPA or DOEE by Armed Forces Retirement Home for any applicable regulation under 40 C.F.R. Parts 60 or 63. This includes, but is not limited to, 40 C.F.R. Part 60 Subparts Da, Db, Dc, IIII, JJJJ, KKKK and 40 C.F.R. Part 63 Subparts GG, YYYY, ZZZZ, DDDDD and JJJJJ. B5, B11 and B12 are exempt from initial notification requirement as existing emergency stationary RICE per § 63.6645(a)(5). *AFRH stated all boilers are natural gas fired boilers exempt from NESHAP JJJJJJ regulation. Initial notifications for the emergency generators, B13 and B14, per NSPS JJJJ were not documented, but was reported in the semi-annual report for the reporting period from January 1 to June 30, 2013. AFRH provided a copy of this report via email on 2/9/2023.*
12. Provide copies of any quarterly, semiannual, and annual reports submitted by the Facility to EPA and DOEE for any applicable regulation under 40 C.F.R. Parts 60 & 63 for the past 4 years. *Annual compliance certifications for 2020-2021 and semi-annual compliance certification for 2020-2022 were provided via email on 2/9/2023.*

V. Closing Conference

After the records review, EPA inspectors, DOEE inspectors, and Sunhee Park and Patrick Benjamin of Armed Forces Retirement Home had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final reports do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the District. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 12:22 AM.

No areas of concern were noted at the closing conference. EPA informed AFRH that they would be receiving a GoAnywhere portal link, on February 3, 2023, to submit their outstanding records including: manufacturer specifications for the AFRH's underground storage tanks, fuel (gasoline and diesel) delivery records, records of DOEE's administrative orders, and all applicable initial notifications.

VI. List of Attachments

Attachment 1: Email correspondence to Susan Bryhan of records requested to review during inspection

Attachment 2: Photo Log

From: [Susan Bryhan](#)
To: [Joseph, Carly](#)
Cc: [Atakilti, Tesfai \(DOEE\)](#); [Laufenberg, Kim](#); [Insley, Ryan \(DOEE\)](#); [Patrick.Benjamin](#)
Subject: Re: EPA Armed Forces Inspection February 2, 2023
Date: Tuesday, January 31, 2023 10:09:24 AM
Attachments: [4pillars-poster.png](#)
[Armed Forces Retirement - Records Request.docx](#)
[Armed Forces Combustion Source List - Spreadsheet Response.xlsx](#)

Message received, we will expect you on Thursday at 0900. Please come to the Scott Building to check in. I've attached our 4 Pillars check in requirements. Thanks!

V/r, Susan Bryhan

Susan Bryhan, FACHE | Administrator, Armed Forces Retirement Home-Washington
3700 N Capitol St NW | Washington, DC 20011 | (O) 202-541-7534 (F) 202-541-7583

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From: Joseph, Carly <Joseph.Carly@epa.gov>
Sent: Tuesday, January 31, 2023 9:56 AM
To: Susan Bryhan <Susan.Bryhan@afrh.gov>
Cc: Atakilti, Tesfai (DOEE) <tesfai.atakilti@dc.gov>; Laufenberg, Kim <laufenberg.kim@epa.gov>; Insley, Ryan (DOEE) <Ryan.Insley@dc.gov>
Subject: EPA Armed Forces Inspection February 2, 2023

Dear Mrs. Sharon Bryhan:

As discussed on our voice message and later over the phone today, EPA Region 3 will be conducting a Clean Air Act (CAA) inspection of Armed Forces Retirement Home this Thursday, February 2, 2023. My colleague, Kim Laufenberg, and I anticipate arriving at 3700 North Capitol Street NW, Washington, D.C around 9:00 AM. We will be sure to bring our vaccine cards and wear masks as required by the Facility.

The scope of the inspection will include, but may not be limited to: a brief opening conference reviewing historical operations and overview of the facility's processes, a facility walk-through (during which photographs will be taken), and a review of records requested (see attached). The Department of Energy & Environment (DOEE) has been notified of the inspection and state inspectors, Atakilti Tesfai and Ryan Insley, plan to attend.

To help facilitate the inspection, it would be appreciated if the records in the attached document were made available for review.

Please confirm receipt of this message and don't hesitate to contact me with any questions.

Sincerely,

Carly Joseph

US Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
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joseph.carly@epa.gov

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APPENDIX B: PHOTO LOG

Facility: Armed Forces Retirement Home

Location: 3700 North Capitol Street NW, Washington, DC 20317

Inspection Date: 2/2/2023

EPA Inspector(s): Carly Joseph

Photographer: Kim Laufenberg



Photo Number: DSC00346

Photo Description: B13 Scott Building Emergency General Hours Meter



Photo Number: DSC00347

Photo Description: B13 Scott Building Emergency General Hours Meter

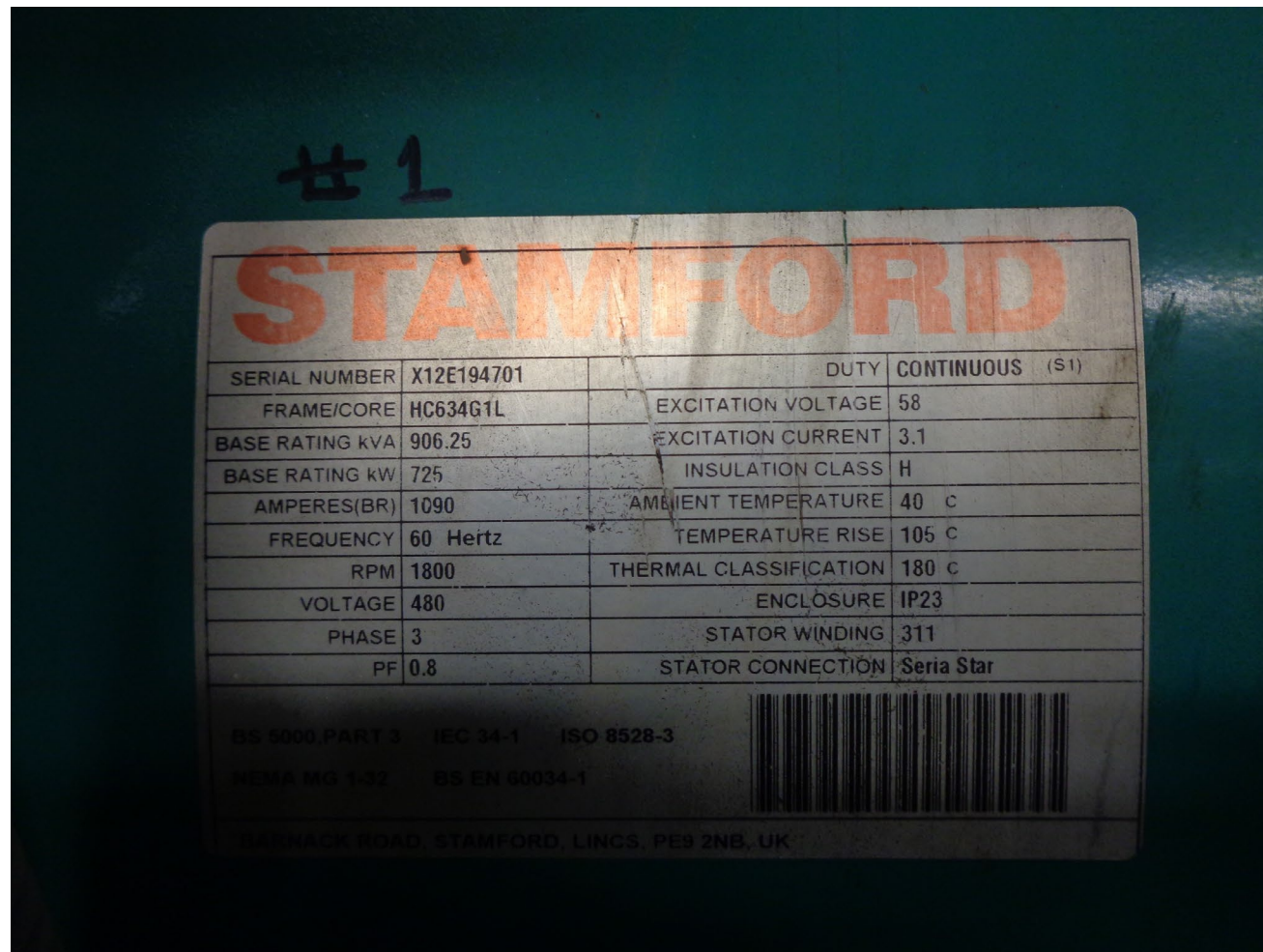


Photo Number: DSC00348

Photo Description: B13 Scott Building Generator Label



Photo Number: DSC00349

Photo Description: B14 Scott Building Generator Hours Meter

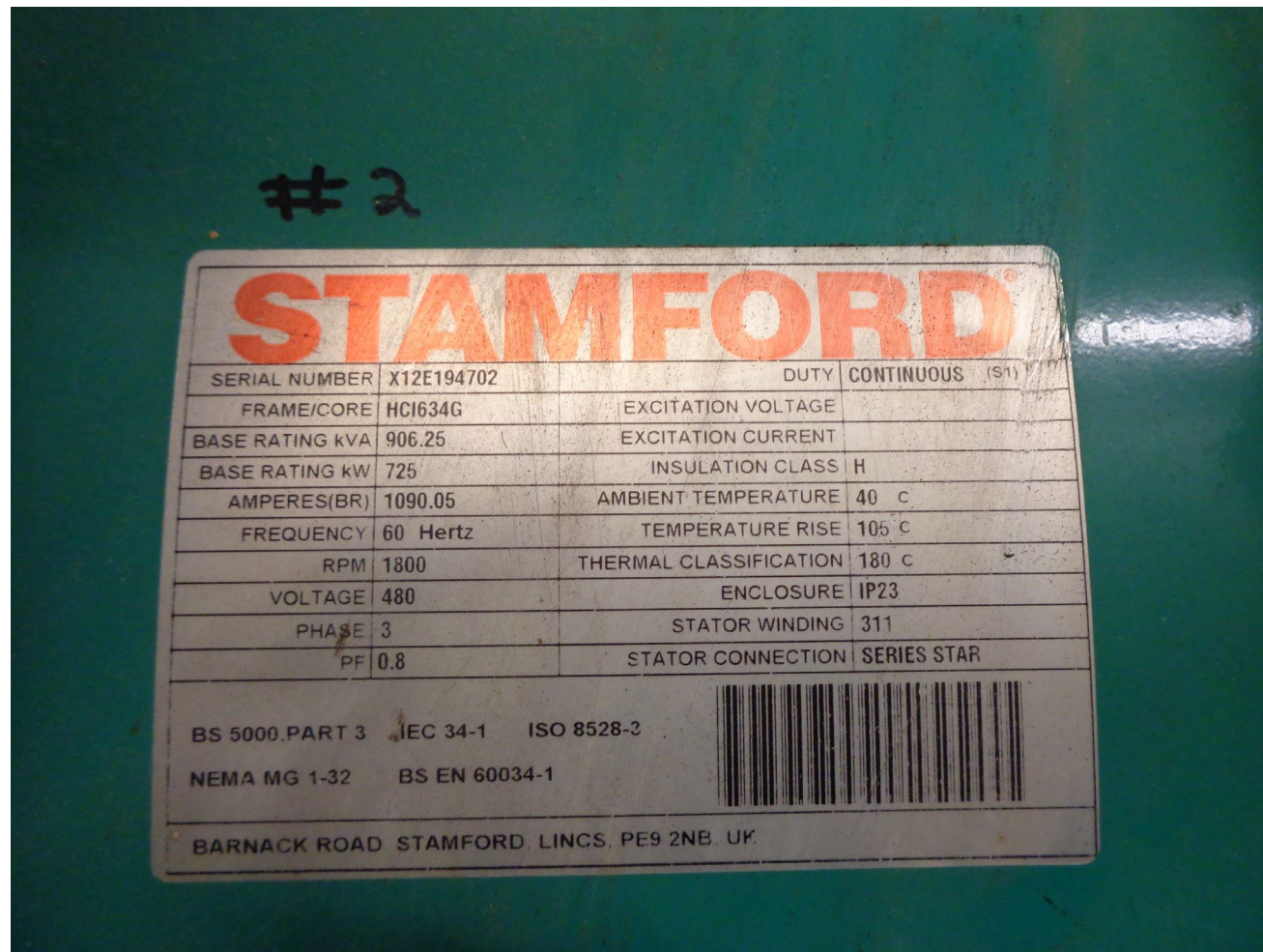


Photo Number: DSC00350

Photo Description: B14 Scott Building Generator Label



Photo Number: DSC00351

Photo Description: Scott Building Generator Room Overview

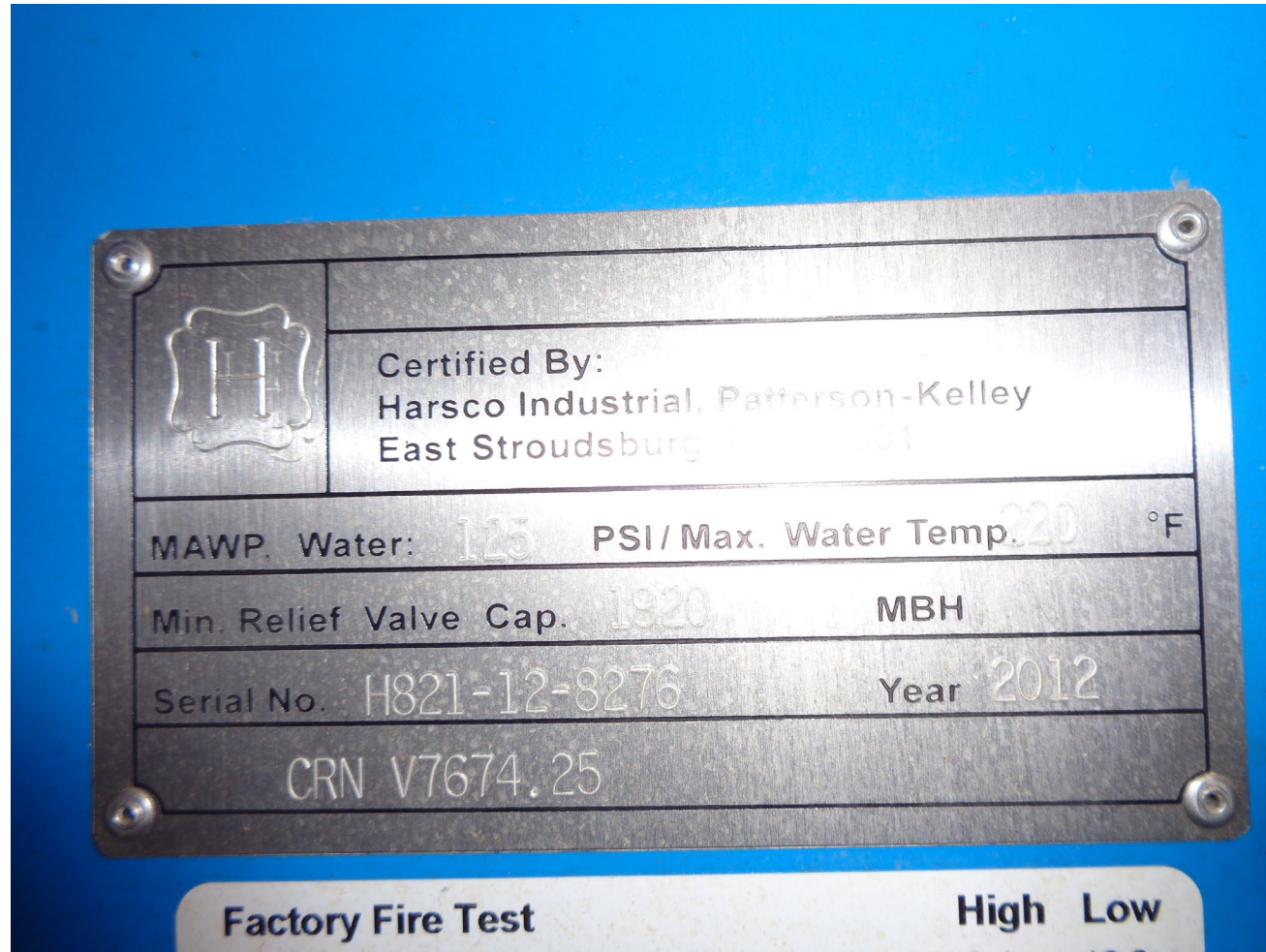


Photo Number: DSC00352

Photo Description: A26 Scott Building Comfort Boiler Label

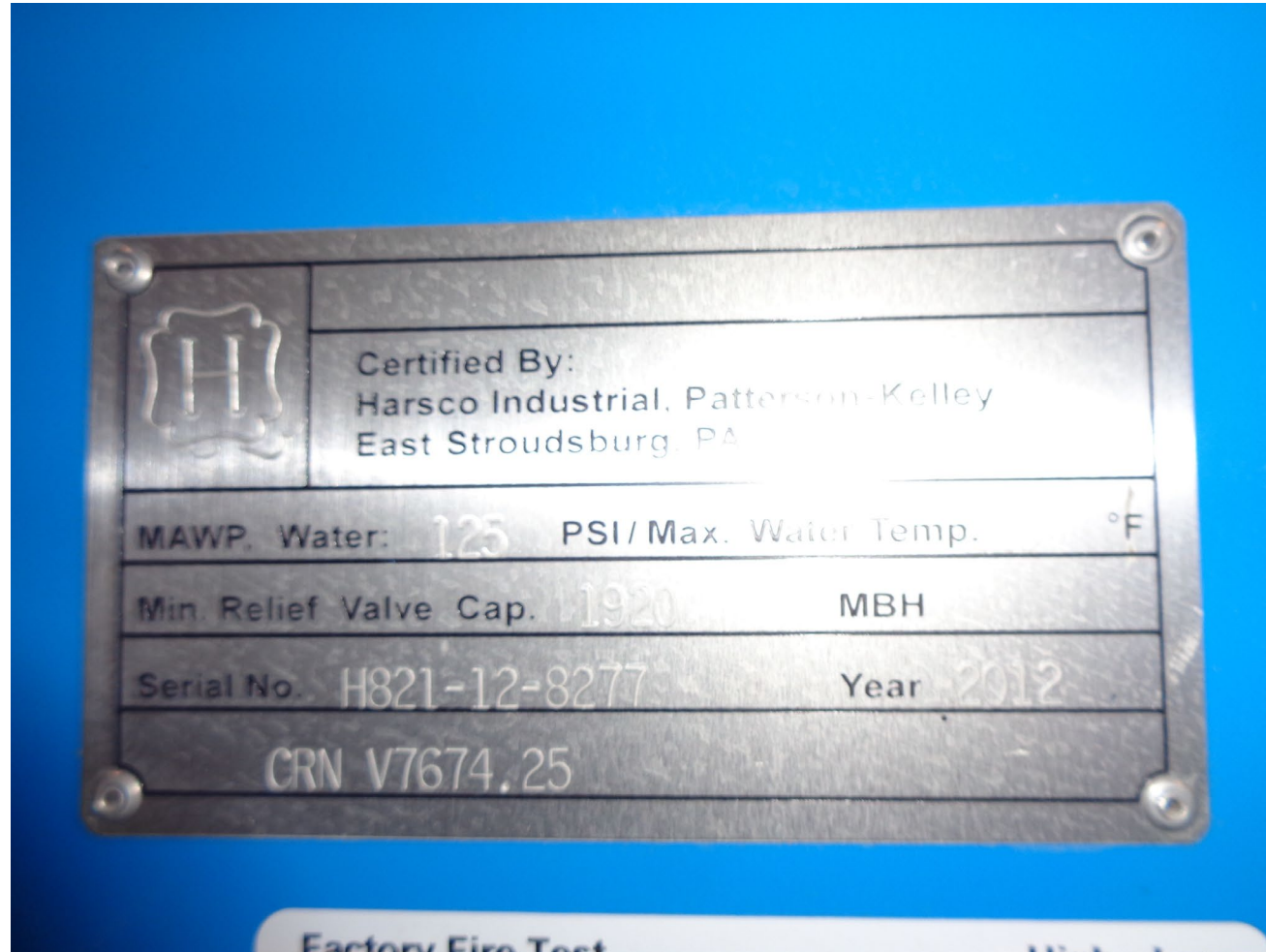


Photo Number: DSC00353

Photo Description: A27 Scott Building Comfort Boiler Label

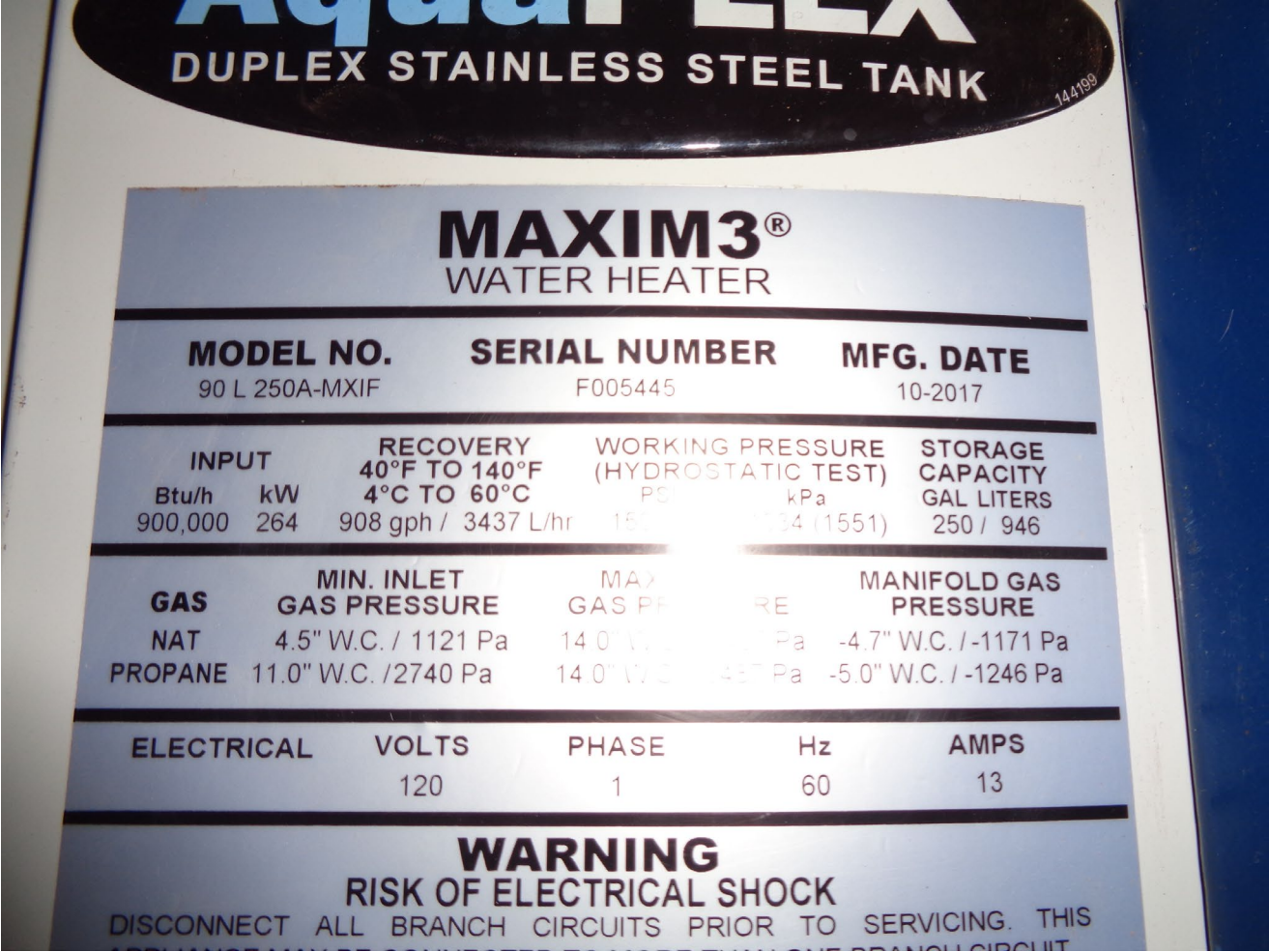


Photo Number: DSC00354

Photo Description: A39 Scott Building Hot Water Boiler Label

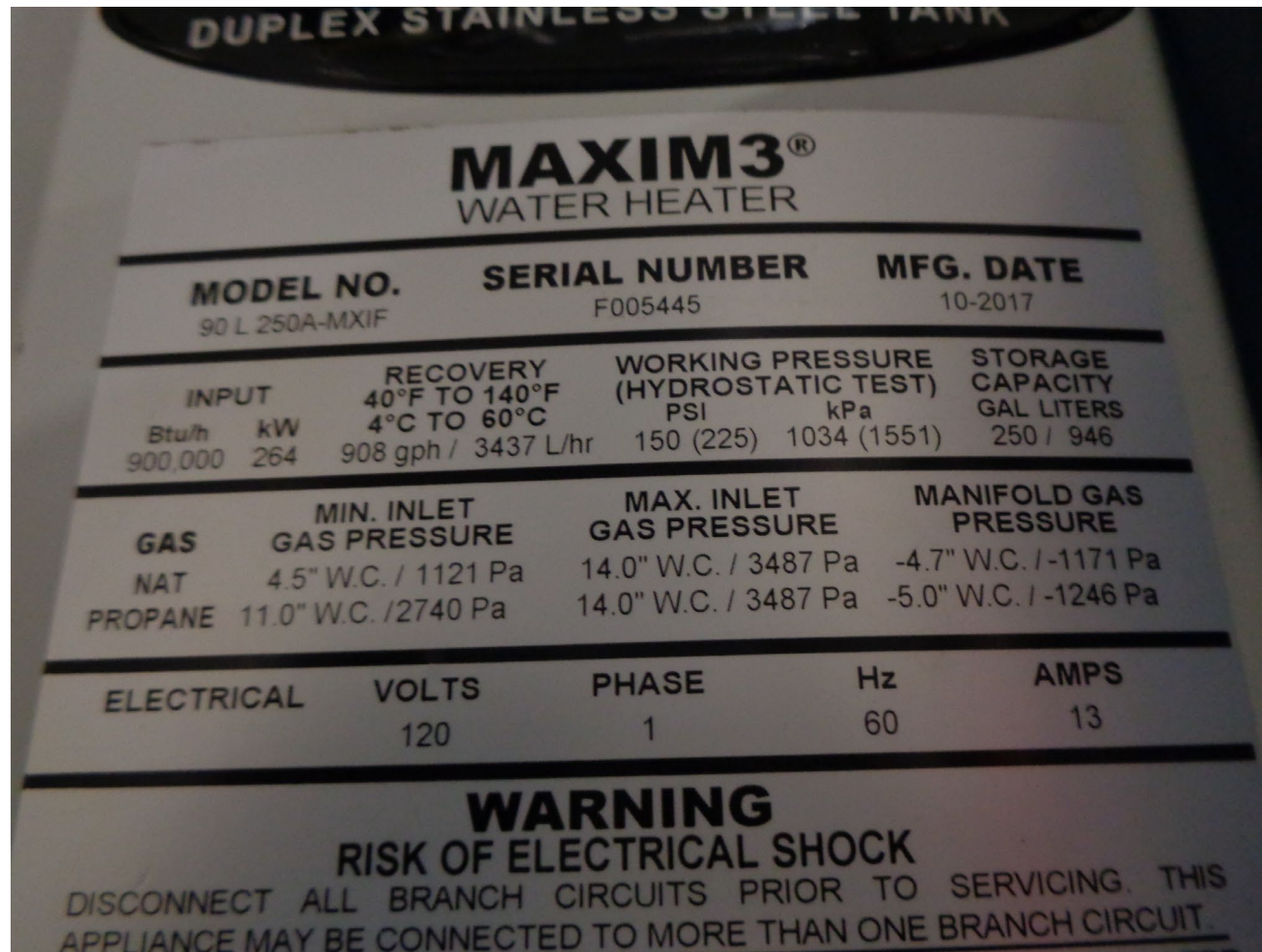


Photo Number: DSC00355

Photo Description: A39 Scott Building Hot Water Boiler Label

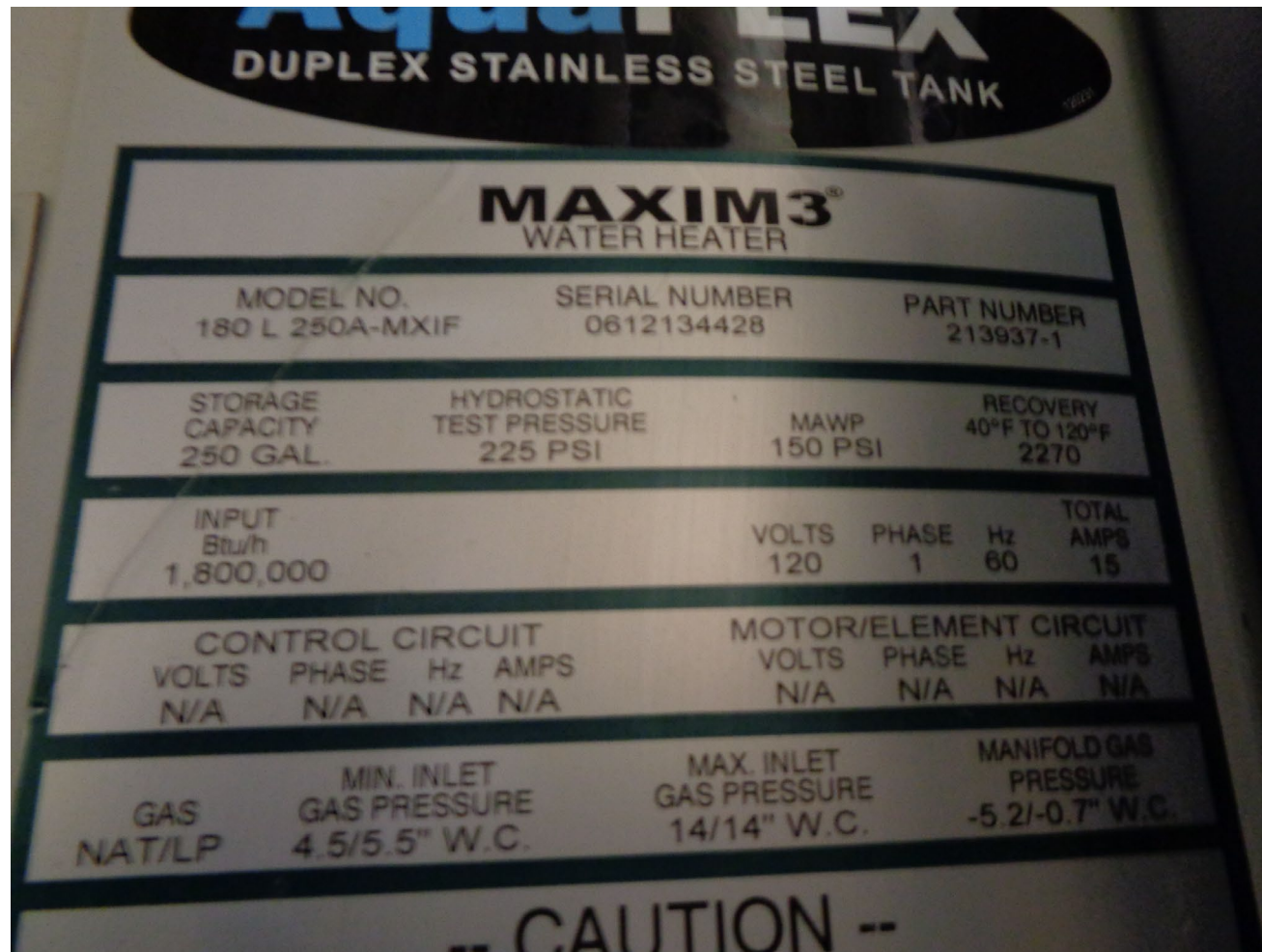


Photo Number: DSC00356

Photo Description: A38 Scott Building Hot Water Boiler Label

STEEL TANK

POWER VT® PLUS

CONDENSING WATER HEATER

MODEL NO.

180 LX 250A-PVIF

SERIAL NUMBER

F016417

MFG. DATE

03-2021

INPUT

Btu/h kW

1,800,000 528

RECOVERY

40°F TO 140°F

4°C TO 60°C

2085 gph / 7892 L/hr

WORKING PRESSURE
(HYDROSTATIC TEST)

PSI

kPa

150 (225) 1034 (1551)

STORAGE

CAPACITY

GAL LITERS

250 / 946

GAS

**MIN. INLET
GAS PRESSURE**

4.5" W.C. / 1121 Pa

**MAX. INLET
GAS PRESSURE**

14.0" W.C. / 3487 Pa

**MANIFOLD GAS
PRESSURE**

-4.8" W.C. / -1196 Pa

PROPANE

11.0" W.C. / 2740 Pa

14.0" W.C. / 3487 Pa

-5.4" W.C. / -1345 Pa

ELECTRICAL

VOLTS

120

PHASE

1

Hz

60

AMPS

15

Photo Number: DSC00357

Photo Description: A37 Scott Building Hot Water Boiler Label



Photo Number: DSC00358

Photo Description: Scott Building Boiler Room Overview

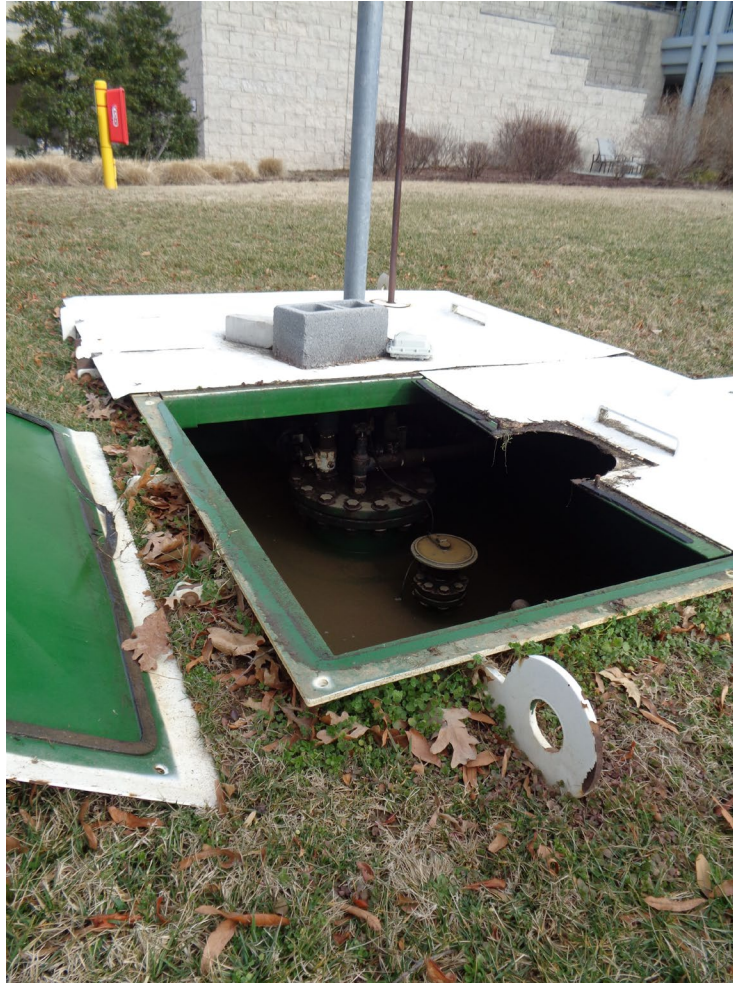


Photo Number: DSC00359

Photo Description: C23 12,000-Gallon Scott Building Propane Tank

 		HYDROTHERM 260 NORTH ELM STREET WESTFIELD, MA 01085			
ANS Z21.13-2010 CSA 4.9-2010					
LOW PRES. BOILER					
DIRECT VENT BOILER/ CHAUDIERE A EVACUATION DIRECTE		MODEL NO / MODELE NO KN30DF	SERIAL NO / SERIE NO. KN30-DF-2013F- 13315		
EQUIPPED FOR / PREVU POUR		NG/LP CRN#M8410.5C			
INLET GAS PRESSURE / PRESSION DE GAZ A L'ENT		NAT GAS / GAZ NAT	LP GAS / GAZ B.P	MANIFOLD GAS PRESSURE / PRESSION DE GAZ AU COLLECTEUR	
MIN. (IN W.C.) / MINI (POUNCES DE COLONNE D' EAU)		2 IN W.C. 4.98	2 IN W.C. / 4.98	NA NA	
MAX. (IN W.C.) / MAXI (POUNCES DE COLONNE D'EAU)		14 IN W.C. / 34.84	14 IN W.C. / 34.84		
0-6000 FEET					
MAX. INPUT / ALIMENTATION		3,000,000 BTU / 879 kW			
MIN. INPUT / ALIMENTATION MINI		600,000 BTU / 219 kW			
MAX OUTPUT / PUISSANCE UTILE		2,781,000 BTU / 812 kW			
MIN OUTPUT / PUISSANCE UTILE		556,200 BTU / 163 kW			
ORIFICE / ORIFICES		NAT 0.872 / PROP. 925			
ELECTRICAL RATING / PUISSANCE ELECTRIQUE NOMINALE: 208/230/3PH/60H MAXIMUM AMPS / AMP MAXI: >12					
FOR EITHER DIRECT VENT INSTALLATION OR FOR INSTALLATION USING INDOOR COMBUSTION AIR POUR OU L'INSTALLATION DES ORIFICES DIRECTES OU POUR L'INSTALLATION EN UTILISANT L'AIR COMBUSTION A L'INTERIEUR FOR INSTALLATION ON COMBUSTIBLE FLOORING INSTALLER SEULEMENT SUR ON PLANCHER COMBUSTIBLE					
MINIMUM CLEARANCES TO COMBUSTIBLE MATERIALS ECARTEMENT MINIMAL DE MATIERES COMBUSTIBLES					
RIGHT AND LEFT SIDE / COTE DROIT ET GAUCHE	6 IN 153 MM	FRONT & REAR DEVANT & ARRIERE	6 IN 153 MM	TOP DESSUS	6 IN 153 MM
				VENT EVENT	6 IN 153 MM
CERTIFIED BY BFC / CERTIFIE PAR BFC					
MAWP 100 PSI / 689 kPa / PSMA 100 PSI / 389.5 k					
MAX. WATER TEMP / TEMP DE L'EAU 250 F / 121 C					
MINIMUM RELIEF VALVE CAPACITY					

Photo Number: DSC00360

Photo Description: A28 Sheridan Building Domestic Water Boiler Label

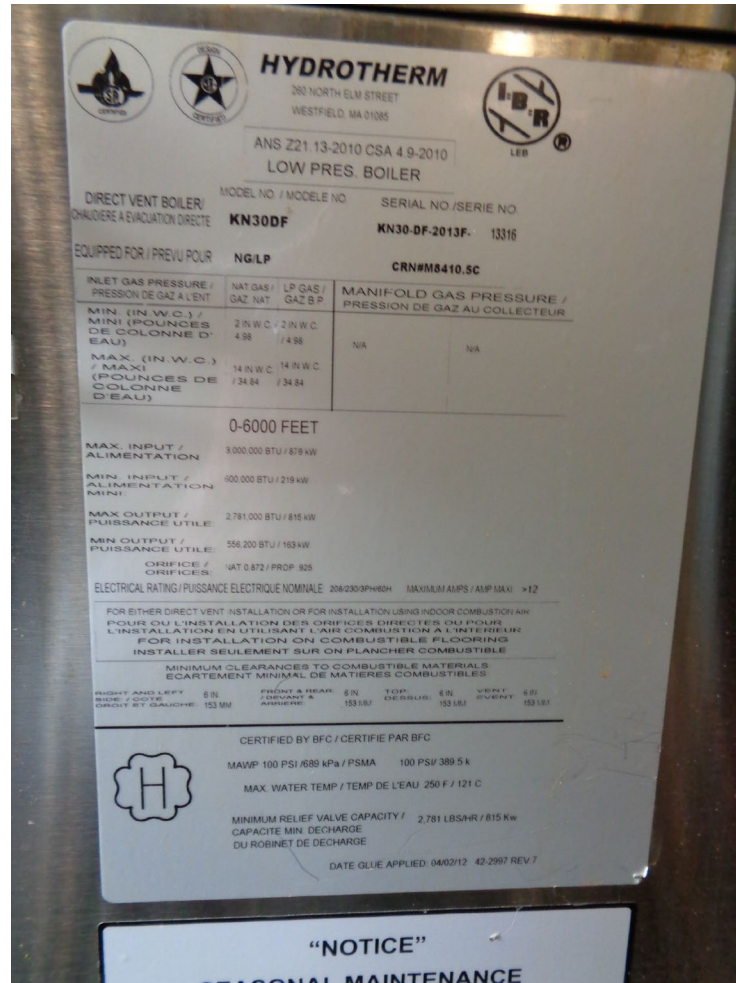


Photo Number: DSC00361

Photo Description: A29 Sheridan Building Comfort Water Boiler Label

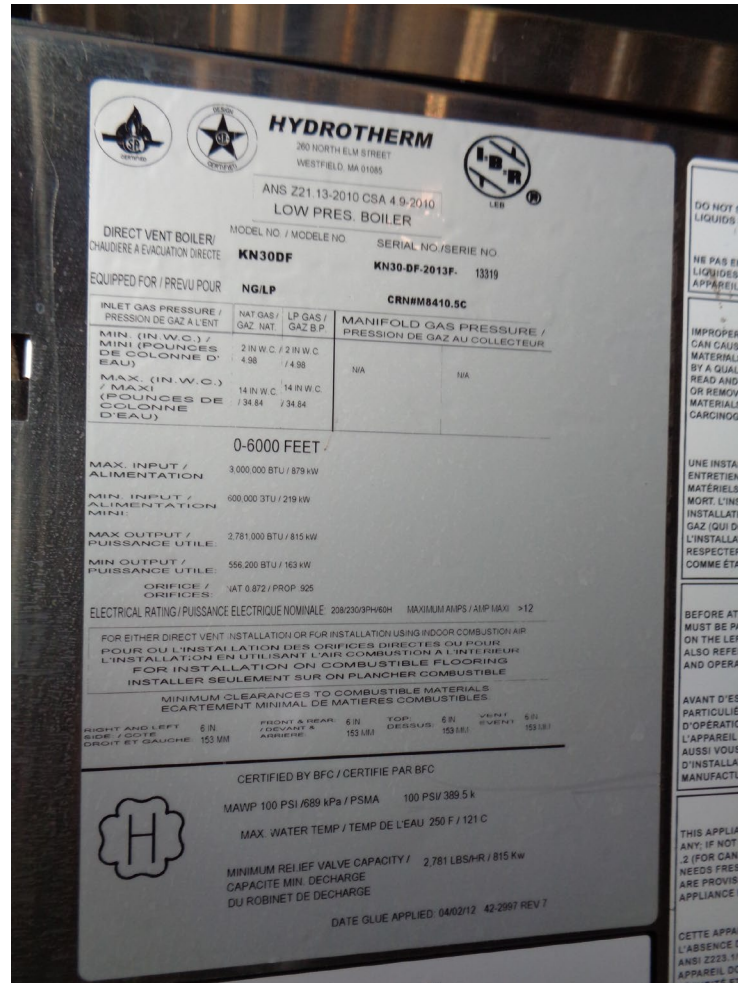


Photo Number: DSC00362

Photo Description: A30 Sheridan Building Comfort Water Boiler Label

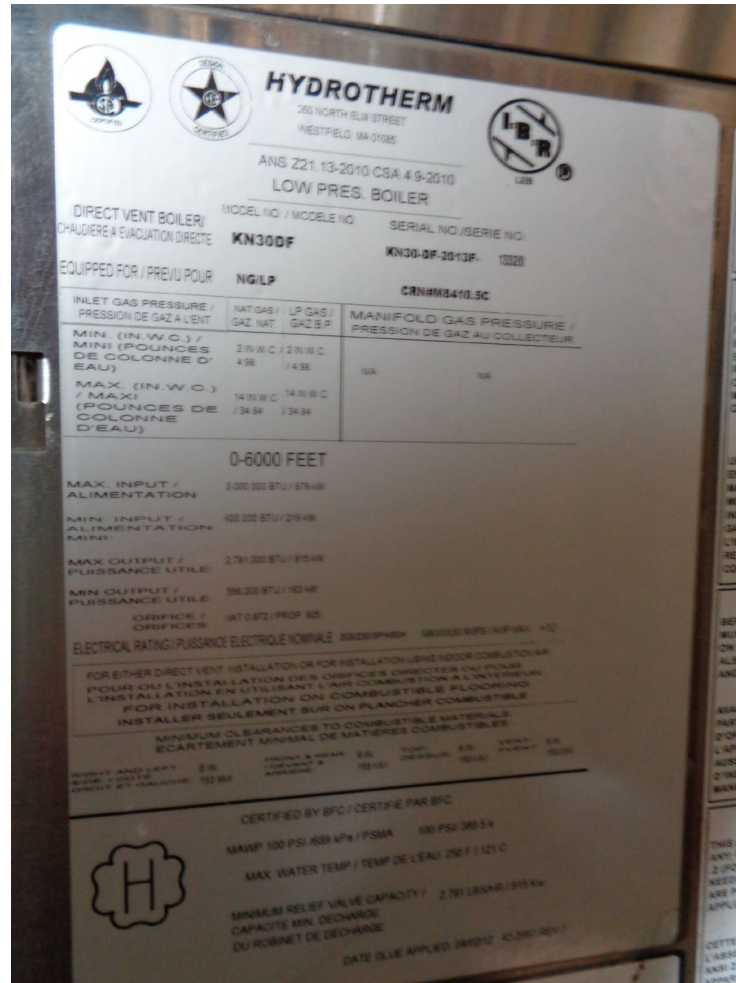


Photo Number: DSC00363

Photo Description: A31 Sheridan Building Comfort Water Boiler Label



HYDROTHERM
 280 NORTH ELM STREET
 WESTFIELD, MA 01085

ANS Z21.13-2010 CSA 4.9-2010
 LOW PRES. BOILER

DIRECT VENT BOILER / CHAUDIERE A EVACUATION DIRECTE
 MODEL NO. / MODELE NO. **KN30DF** SERIAL NO. / SERIE NO. **KN30-DF-2013F-13318**

EQUIPPED FOR / PREVU POUR **NG/LP** **CRN#M8410.5C**

INLET GAS PRESSURE / PRESSION DE GAZ A L'ENT	NAT GAS / GAZ NAT	LP GAS / GAZ B.P.	MANIFOLD GAS PRESSURE / PRESSION DE GAZ AU COLLECTEUR	
MIN. (IN.W.C.) / MIN. (POUNCES DE COLONNE D'EAU)	2 IN.W.C. / 4.98	2 IN.W.C. / 4.98	NA	NA
MAX. (IN.W.C.) / MAX. (POUNCES DE COLONNE D'EAU)	14 IN.W.C. / 34.84	14 IN.W.C. / 34.84		

0-6000 FEET
 MAX. INPUT / ALIMENTATION 3,000,000 BTU / 879 kW
 MIN. INPUT / ALIMENTATION MIN. 600,000 BTU / 219 kW
 MAX OUTPUT / PUISSANCE UTILE 2,781,000 BTU / 815 kW
 MIN OUTPUT / PUISSANCE UTILE 556,200 BTU / 163 kW

ORIFICE / ORIFICES 1/4" @ 0.872 / PROP. 925
 ELECTRICAL RATING / PUISSANCE ELECTRIQUE NOMINALE 208/230/3PH/60H MAXIMUM A.M.P.S. / A.M.P. MAX. >12

FOR EITHER DIRECT VENT INSTALLATION OR FOR INSTALLATION USING INDOOR COMBUSTION AIR
 POUR OU L'INSTALLATION DES ORIFICES DIRECTES OU POUR L'INSTALLATION EN UTILISANT L'AIR COMBUSTION A L'INTERIEUR
 FOR INSTALLATION ON COMBUSTIBLE FLOORING
 INSTALLER SEULEMENT SUR ON PLANCHER COMBUSTIBLE

MINIMUM CLEARANCES TO COMBUSTIBLE MATERIALS
 ECARTEMENT MINIMAL DE MATIERES COMBUSTIBLES

RIGHT AND LEFT SIDE / COTE DROIT ET GAUCHE	FRONT & REAR / DEVANT & ARRIERE	TOP / DEHORS	VENT. EVENT
6 IN / 153 MM	6 IN / 153 MM	6 IN / 153 MM	6 IN / 153 MM

CERTIFIED BY BFC / CERTIFIE PAR BFC
 MAWP 100 PSI / 689 kPa / PSMA 100 PSV 389.5 k
 MAX. WATER TEMP / TEMP DE L'EAU 250 F / 121 C
 RELIEF VALVE CAPACITY / 2,781 LBS/HR / 815 kW

Photo Number: DSC00364

Photo Description: A32 Sheridan Building Comfort Water Boiler Label

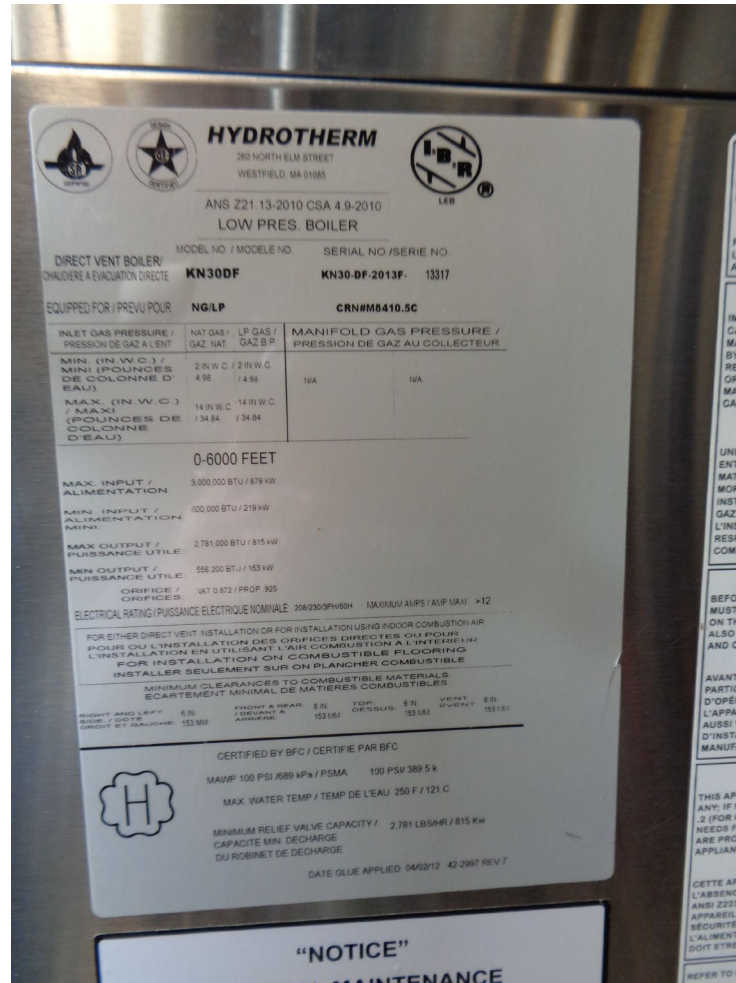


Photo Number: DSC00365

Photo Description: A33 Sheridan Building Comfort Water Boiler Label



Photo Number: DSC00366

Photo Description: Sheridan Building Boiler Room Overview



Photo Number: DSC00367

Photo Description: C22 12,000-Gallon Sheridan Building Propane Tank

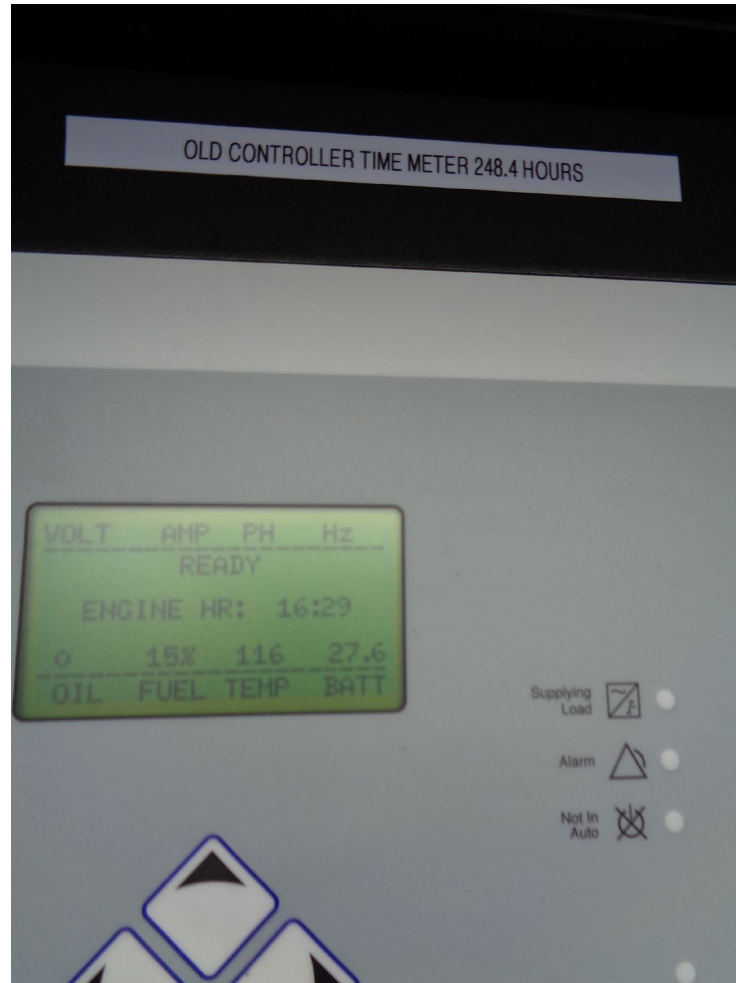


Photo Number: DSC00368

Photo Description: B5 Sheridan Building Generator Hours Meter



Photo Number: DSC00369

Photo Description: B5 Sheridan Building Generator Label



Photo Number: DSC00370

Photo Description: C11 600-Gallon Diesel Tank for B5 Sheridan Building Generator



Photo Number: DSC00371

Photo Description: B5 Sheridan Building Generator Overview

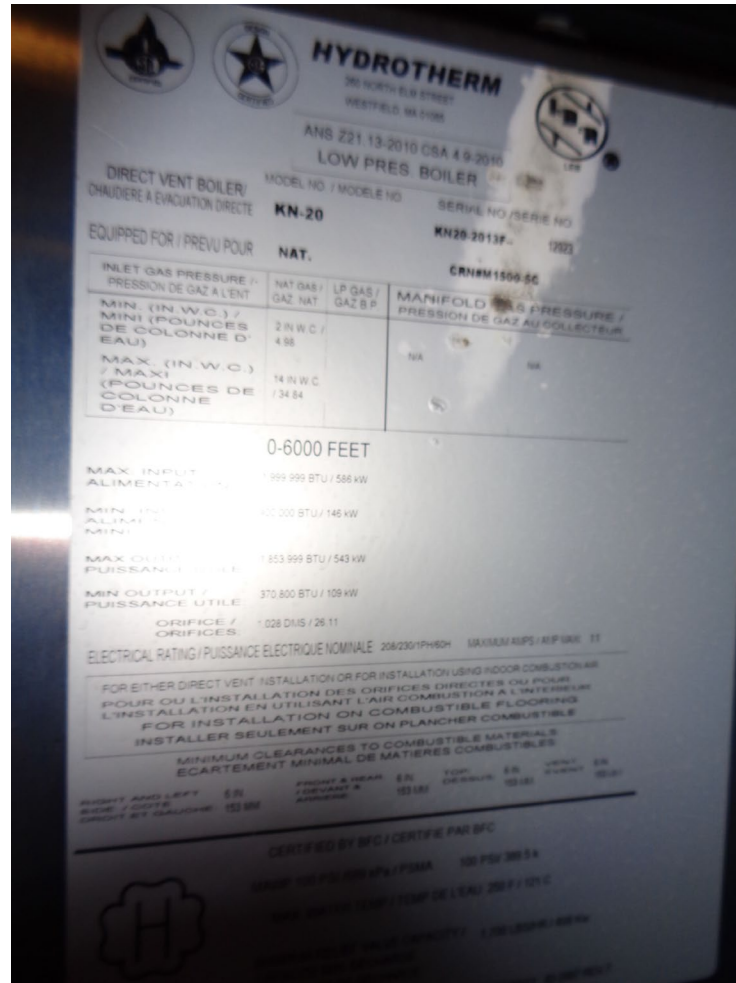


Photo Number: DSC00372

Photo Description: A34 North Building Converter Boiler Label

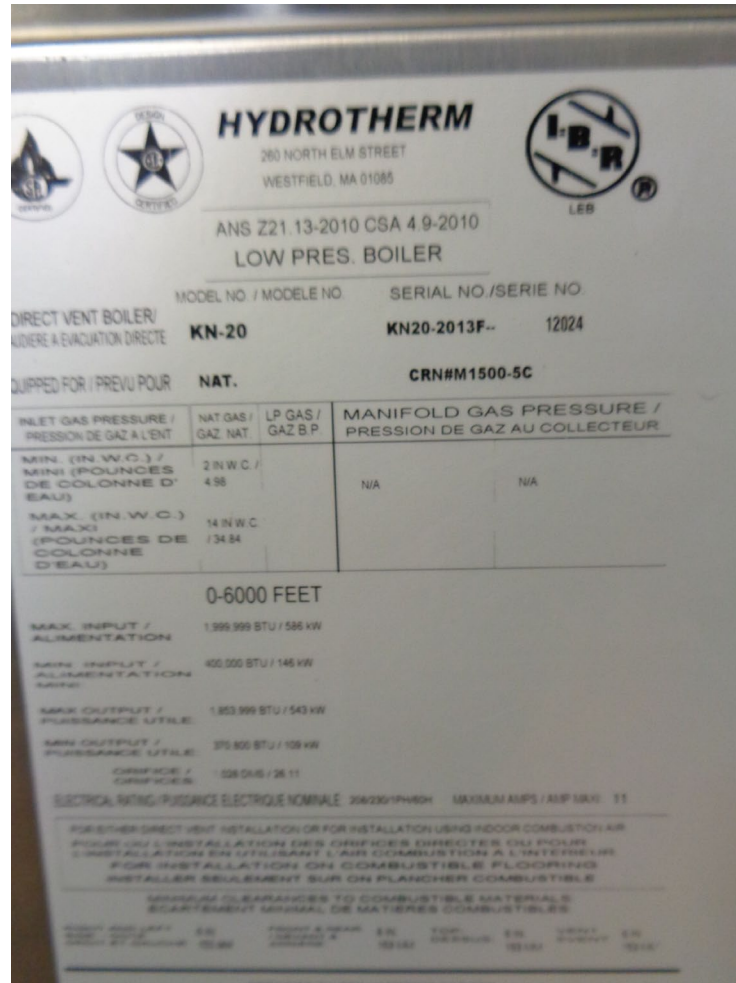


Photo Number: DSC00373

Photo Description: A35 North Building Converter Boiler Label

260 NORTH ELM STREET
WESTFIELD, MA 01085

ANS Z21.13-2010 CSA 4.9-2010
LOW PRES. BOILER

MODEL NO. / MODELE NO. SERIAL NO. / SERIE NO.
KN-20 KN20-2013F-- 12022

DESIGNED FOR / PREVU POUR **NAT. CRN#M1500-5C**

LET GAS PRESSURE / PRESSION DE GAZ A L'ENTRÉE	NAT GAS / GAZ NAT.	LP GAS / GAZ B.P.	MANIFOLD GAS PRESSURE / PRESSION DE GAZ AU COLLECTEUR	
MIN. (IN. W.C.) / MINI (POUNCES DE COLONNE D'EAU)	2 IN. W.C. / 4.98		N/A	N/A
MAX. (IN. W.C.) / MAXI (POUNCES DE COLONNE D'EAU)	14 IN. W.C. / 34.84			

0-6000 FEET

MAX. INPUT /
ALIMENTATION 1,999,999 BTU / 586 kW

MIN. INPUT /
ALIMENTATION 400,000 BTU / 146 kW

MAX. OUTPUT /
PUISSANCE UTILE 1,853,999 BTU / 543 kW

MIN. OUTPUT /
PUISSANCE UTILE 370,800 BTU / 109 kW

ORIFICE /
ORIFICES 1.028 DUIS / 26.11

ELECTRICAL RATING / PUISSANCE ELECTRIQUE NOMINALE 208/230V/1PH/60H MAXIMUM AMPS / AISP (MAX) 11

FOR EITHER DIRECT VENT INSTALLATION OR FOR INSTALLATION USING INDOOR COMBUSTION AIR
POUR OU L'INSTALLATION DES ORIFICES DIRECTES OU POUR L'INSTALLATION EN UTILISANT L'AIR COMBUSTION A L'INTERIEUR
FOR INSTALLATION ON COMBUSTIBLE FLOORING
INSTALLER SEULEMENT SUR ON PLANCHER COMBUSTIBLE

MINIMUM CLEARANCES TO COMBUSTIBLE MATERIALS
ECARTEMENT MINIMAL DE MATIERES COMBUSTIBLES

RIGHT AND LEFT SIDE / COTÉ DROIT ET GAUCHE	FRONT & REAR / DEVANT & ARRIERE	TOP DESSUS	VENT DEVANT
6 IN. 153 MM	6 IN. 153 MM	6 IN. 153 MM	6 IN. 153 MM

CERTIFIED BY BFC / CERTIFIE PAR BFC

MAWP 100 PSI / 689 kPa / PSMA 100 PSI / 389.5 k

MAX. WATER TEMP / TEMP DE L'EAU 250 F / 121 C

Photo Number: DSC00374

Photo Description: A36 North Building Converter Boiler Label



Photo Number: DSC00375

Photo Description: North Building Boiler Room Overview



Photo Number: DSC00376

Photo Description: B11 Sherman Building Generator Hours Meter

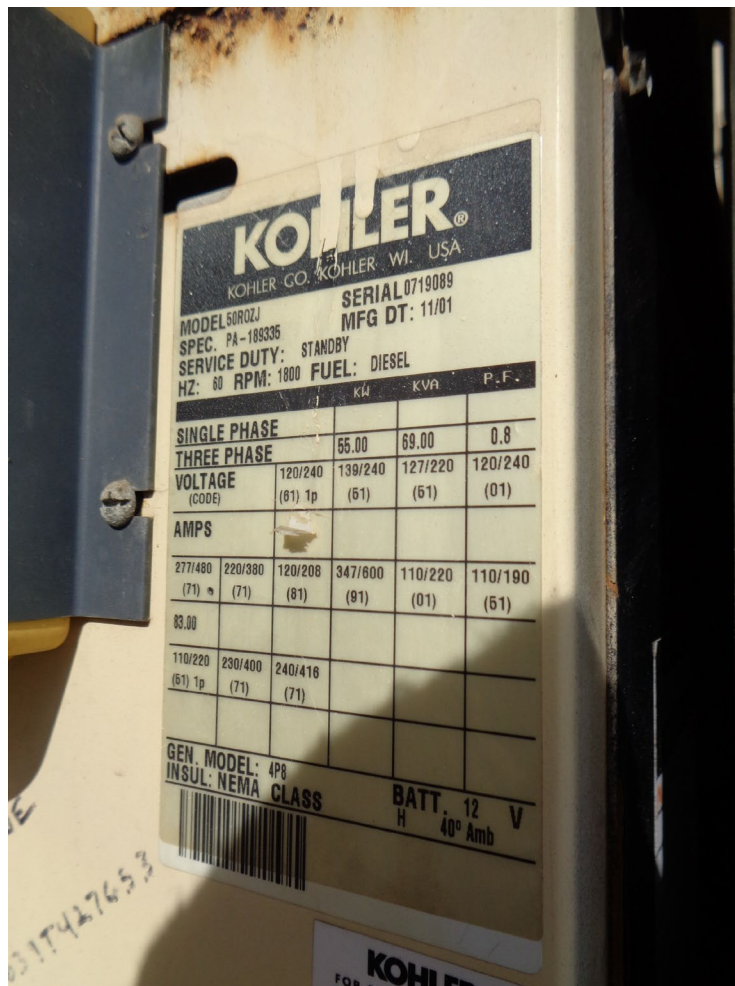


Photo Number: DSC00377

Photo Description: B11 Sherman Building Generator Label



Photo Number: DSC00378

Photo Description: C21 500-Gallon Diesel Tank for B11 Sherman Building Generator



Photo Number: DSC00379

Photo Description: B11 Sherman Building Generator Overview



Photo Number: DSC00380

Photo Description: B12 Security Building Decommissioned Generator Hours Meter

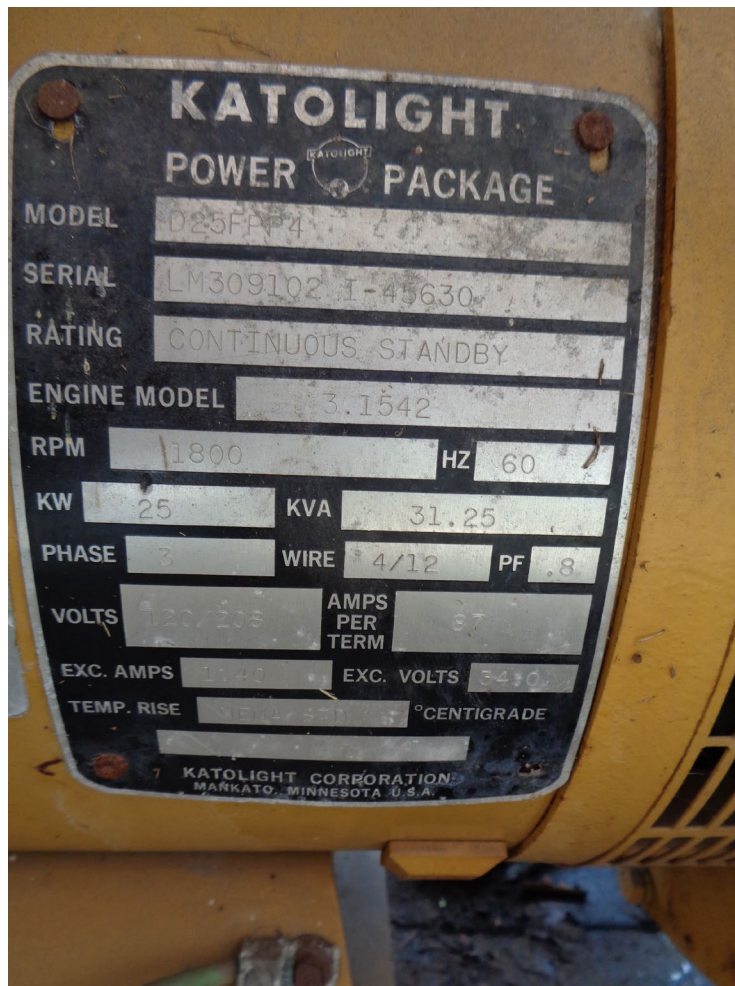


Photo Number: DSC00381

Photo Description: B12 Security Building Decommissioned Generator Label



Photo Number: DSC00382

Photo Description: B12 Security Building Decommissioned Generator Overview