



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Regional Laboratory
Laboratory Services and Applied Science Division
11 Technology Drive, North Chelmsford, MA 01863

Report Memorandum

Drafted: 09/08/2021

Finalized: 09/28/2021

Subject: Stack Emission Testing Observations –

From: William Osbahr, Stack Testing Coordinator, /WAO/
Field Services Branch (FSB)
Tyler Kotsifas, Stack Testing Coordinator (Trainee), FSB /TLK/

Through: Jerry Keefe, Investigations Team Leader, FSB /JCK/

To: Christine Sansevero, Chief, Air Compliance Section
Enforcement and Compliance Assurance Division

Facility Information:

- A. Facility Name: Wakefield Municipal Gas and Light Department
- B. Facility Location: 443 Salem Street, Wakefield, MA 01880
- C. Facility Contact: Dave Polson, Plant Representative (781) 812-8128 #
- D. ICIS-Air #: MA0000002511903918

Background Information:

- A. Date of test: 8/19/21
- B. US EPA Representative: William Osbahr, Tyler Kotsifas
- C. Federally Enforceable Requirements Investigated: 40 CFR Part 60 Subpart JJJJ

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.

Attendees

Name	Role/Title	Organization
William Osbahr	Stack Testing Coordinator	US EPA
Tyler Kotsifas	Stack Testing Coordinator (Trainee)	US EPA
David Caron	Stack Tester Project Manager	Montrose Air Quality Services
Justin Coleman	Stack Tester Technician	Montrose Air Quality Services
Chris Lydon	Generator Technician	Milton CAT
Kurt Bode	Plant Operator	Wakefield Gas and Light Department

Background:

The purpose of this memorandum is to provide a summary of EPA representatives Mr. Osbahr and Mr. Kotsifas observations during August 19, 2021 emissions test of two spark ignition engines located at the Wakefield Municipal Gas and Light Department (WMGLD).

The facility is subject to the emissions requirement under 40 CFR Part 60 Subpart JJJJ.

Test Observation Notes:

US EPA representatives arrived at the facility at 7:30 am on 8/19/21. The Inspectors presented their credentials and informed Mr. Bode, the plant operator for WMGLD they were there to observe emission testing

A list of attendees was recorded which is the same as the one listed above.

Mr. Caron of Montrose was the primary sampling system operator, with assistance from Mr. Coleman.

Generator 2 Testing

Mr. Caron performed a pretest calibration of Montrose's CEM system prior to testing. US EPA representatives observed the results of the initial calibrations. Initial calibrations were observed to be acceptable by US EPA representatives. Subsequent calibrations would be recorded and included in the emissions test report.

The first test run took place from 9:15-10:15 am.

The second test run took place from 11:10-12:10 pm.

The third test run took place from 12:30-1:30 pm.

For all three runs, a post run pitot tube leak checks were witnessed by EPA and passed method requirements.

Moisture sample train post run leak checks passed, however, not until a final review of the techniques utilized by Mr. Caron could be assessed after the third run.

Moisture for the three runs were as follows.

Run 1	Run 2	Run 3
15.2%	15.3%	14.6%

Testing operating parameters for the generator were recorded by Mr. Lydon of Milton CAT. Throughout the test period Generator 2 sustained 95-97% full load. Load data was recorded every 12 minutes.

Generator 1 Testing

Generator 1 could not be tested as the existing stack test port cap was frozen in place. Generator 1 testing will take place without EPA observation at a later date. Testing data for generator 1 will be documented in the final report.

Inspectors Osbahr and Kotsifas left the facility at approximately 1:45 pm.