



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Clean Air Act Inspection Report

Drafted: March 28, 2024

Finalized: March 29, 2024

EPA Inspector: Abdi T. Mohamoud, Environmental Engineer, Air Compliance Section /ATM/

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

Date of Inspection: March 12, 2024

Facility Names: Community Academy of Science and Health
Richard J. Murphy School
Joseph Lee School

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Facility Locations: 11 Charles Street, Dorchester, MA 02122
1 Worrell Street, Dorchester, MA 02122
174 Talbot Avenue, Dorchester, MA 02124

Disclaimer:

Unless otherwise noted, this report describes conditions observed by EPA inspector, or reported to EPA inspector by facility representatives, at the facility/property at the time of the inspection and may not capture all operations or activities ongoing at the time of the inspection. Nothing in this report prevents the Agency from pursuing further investigation or action as authorized by federal statutes and regulations.

Inspection Attendees:

Name	Title	Organization
Abdi T. Mohamoud	Clean Air Act, Inspector	US EPA
Darren Fortescue	Clean Air Act, Manager	US EPA
James Yee	Electrical Senior Supervisor	Boston Public Schools

Facilities/Process Description

The Cash Community Academy of Science and Health (“CASH”) is a small, college-prep high school. Its mission is to prepare students from diverse backgrounds to pursue advanced studies and careers in the fields of science and health. CASH employs about 70 employees and its Working hours are: Monday – Friday from 6:00 am - 11:00 pm.

Richard J. Murphy School (“Murphy”) is a Pre-K-8 public school in Dorchester, Massachusetts that is part of Boston Public Schools (“BPS”). It serves 836 students in Pre-K – 8. Its working hours are Monday – Friday from 8:30 am - 3:10 pm.

Joseph Lee School (“Lee”) is a K-8 public school in Dorchester, Massachusetts that is part of BPS. It serves 541 students in Pre-K - 8 with a student/teacher ratio of 10.2:1. Its working hours are: Monday – Friday from 7:30 am - 2:20 pm.

Potentially Applicable Clean Air Act Requirements:

- 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines
- 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Previous Enforcement Actions:

Based on a review of the EPA’s Enforcement and Compliance History Online database (“ECHO”) and there have been no formal or informal enforcement actions against this facility in the last 5 years.

Opening Conference:

EPA inspectors, Abdi Mohamoud and Darren Fortescue arrived at the CASH facility, located at 11 Charles Street, Dorchester, Massachusetts, at 6:30 am. The inspectors were met by James Yee, Electrical Senior Supervisor at CASH, Murphy and Lee. The inspectors presented their EPA credentials. Mr. Mohamoud explained the purpose of the inspections for the three above schools was to evaluate their compliance with the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

Mr. Mohamoud initiated an opening conference that covered all three facilities, CASH, Murphy and Lee.

Mr. Yee said that half of the CASH operates as swing capacity for the BPS system, while the rest is a more traditional high school. Mr. Yee said that the school operates a Strive program for disabled students. Mr. Yee said the school has been in operation since the 70’s.

Mr. Yee said that the CASH operates an emergency backup power generator that was purchased approximately five years ago. Mr. Yee said that the emergency generator provides power to run the elevators and egress lighting during emergencies. Mr. Yee said the engine is exercised once a week for approximately one hour and is fueled with natural gas. Mr. Fortescue asked if BPS has an EPA Certificate of Conformity for the engine that describes that the generator can be operated on natural gas and Mr. Yee said he was not sure; however, he said that EPA could check with Brian Forde, the BPS Facilities Manager.

Mr. Yee said that the CASH also operates a Cogen engine. Mr. Yee said that the Cogen supplies electricity back to the grid and Eversource buys the electricity back from BPS. Mr. Fortescue asked if BPS has a contract between them and Eversource for the electricity by back and Mr. Yee said, yes, they probably do. Mr. Yee said he thought the Cogen was an older generator. Mr. Fortescue asked if the Cogen is fitted with any air pollution control equipment and Mr. Yee said he thought that it only had a muffler.

Mr. Yee said both generators have hour meters and logbooks to document when they run. Mr. Fortescue asked if the facility has an air operating permit and Mr. Yee said he did not know and that the inspectors could contact Maria Carvalho, the Head of Environmental Division to enquire about permits. Mr. Yee said that the inspectors should also contact Ms. Carvalho to enquire about any notifications or reports that BPS might have submitted to EPA pertaining to the engines.

Mr. Yee said he did not know if any air emissions testing had been conducted on the generators and that the EPA inspectors could contact the Energy Division to enquire about testing. Mr. Yee said that a company called Energy performs preventative maintenance on the Cogen, and the company Lynwell subcontracts out the maintenance responsibilities for the emergency generator to Power Products.

Mr. Yee said that Murphy has also two electrical generators, one emergency generator and one Cogen, while Lee has only one emergency generator. Mr. Yee said that the answers to all the questions pertaining to the CASH would be the same for the Murphy and Lee facilities.

Facilities Tour:

CASH

The EPA Inspectors were led by Mr. Yee to Room 108 of the CASH facility. Mr. Mohamoud and Mr. Fortescue observed a generator that Mr. Yee said was the Cogen. The EPA Inspectors observed that the Cogen was running during the inspection and Mr. Yee said that it runs continuously, unless something goes wrong. The EPA Inspectors documented that the engine manufacturer was MAN; Model E2876E312; SN 29827540362756; Capacity 170 KW; Manufactured 2010. The EPA Inspectors observed that it appeared to be fueled with natural gas.

The EPA Inspectors documented that the engine had an emissions label describing that it complies 2010 standards for natural gas.

The EPA Inspectors were led by Mr. Yee to Room A-009 of the CASH facility. Mr. Mohamoud and Mr. Fortescue observed a generator that Mr. Yee said was the emergency generator. The EPA Inspectors observed that the emergency generator was not running during the inspection. The EPA Inspectors documented that the engine manufacturer was Power Solutions Inc.; Model PSI-5.7L; SN 39001064; Manufactured 10/8/2014. The EPA Inspectors observed that it appeared to be fueled with natural gas. The EPA Inspectors documented that the engine had an emissions label describing that it is certified for use with natural gas. Mr. Yee said the emergency unit runs maybe half an hour or an hour for testing in a month. The logbook next to the engine indicated the meter reading on May 18, 2023 was 112.42 hours and on January 22, 2024 was 112.50 hours.

Murphy

At 7:30 am, the group proceeded to the Murphy facility located at 1 Worrell Street, Dorchester, Massachusetts. The group proceeded to a room that the EPA Inspectors observed contained a generator that Mr. Yee said was the emergency generator. The EPA Inspectors documented that the engine was manufactured by Cummins/ Power Solutions Inc.; Model GM-8.1L; SN 8P1L17954; Capacity 198 BHP. The EPA Inspectors observed that it appeared to be fueled with natural gas. The EPA Inspectors documented that the engine had an emissions label describing that it is certified for use with natural gas. The EPA Inspectors observed that at the time of the inspection, this unit was not running.

The group proceeded to a second room where the EPA Inspectors observed a generator that Mr. Yee said was the Cogen. The EPA Inspectors observed that the Cogen was running during the inspection. The EPA Inspectors documented that the engine manufacturer was MAN; Model E2876E203; SN 29808091690788; Capacity 150 KW.

Lee

The group proceeded to the Lee facility, located at 174 Talbot Avenue, Dorchester, Massachusetts. The group proceeded to a room where the EPA Inspectors observed a generator that Mr. Yee said was the emergency generator. The EPA Inspectors documented that the generator was manufactured by Ford; Model L568751-6005A; SN 22941-F04RBC. The EPA Inspectors observed that it appeared to be fueled with natural gas. The EPA Inspectors documented that the hour meter for the generator read 481.9 hours.

Closing Conference:

At the end, Mr. Mohamoud and Mr. Fortescue thanked Mr. Yee for his assistance and left the Lee School at 8:45 am.