

EHS&R Newsletter

FIRST QUARTER 2021



CAMS 2021 Safety Initiatives

Since its inception in 2007, CAMS has prioritized a safe work environment.

We want our employees to have an exceptional experience both on and off the job. This goal requires attention to detail, consistent program implementation, leadership involvement, and the ability to adapt in changing circumstances. The 2020 pandemic presented numerous staffing and management challenges at our facilities, which were managed collaboratively through our internal Emergency Operations Center. CAMS will continue to be vigilant in its COVID-19 response as we increase our Health & Safety communications and leadership involvement at all levels of our organization. Expect to see several new initiatives in the coming months to include:

- Quarterly Safety Townhall Meetings
- Case Management Support for workplace injuries
- Team site visits by Health & Safety and CAMS Leadership

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Calhoun Power and Lincoln Generating Station Lead with Safety

Two CAMS facilities, Calhoun Power and Lincoln Generating Station are recognized leaders in the safety arena. Both sites are Voluntary Protection Program (VPP) Star sites.

Calhoun Power Company, LLC is a 688-MW dual-fuel simple-cycle generation facility located in Eastaboga, Ala. The plant's four GE 7FA gas turbine engines generate enough electricity to power over 500,000 homes in the region. The plant is owned by [Harbert Power Fund V, LLC](#) and had been operated by CAMS since 2016.

The Lincoln Generating Facility is a 656-MW natural gas-fired simple-cycle facility located southeast of Manhattan, Ill. The plant includes eight GE 7EA Gas Turbines, four of which have black start capability.

The plant is owned by [Eastern Generation, LLC](#) and has been operated by CAMS since 2016.

As VPP sites, the Calhoun and Lincoln management teams, site staff, and OSHA work together to prevent fatalities, injuries, and illnesses. A tailored system is implemented that incorporates the key elements of the VPP program:

- Management Leadership and Employee Involvement
- Work Site Analysis
- Hazard Prevention and Control
- Health and Safety Training

To participate, a formal application to OSHA is required, followed by a rigorous onsite evaluation by a team of safety and health professionals. VPP participants are re-evaluated every three to five years to remain in the program.



LINCOLN GENERATING FACILITY

The Lincoln Generating Facility program fundamentals include:

MANAGEMENT LEADERSHIP AND EMPLOYEE INVOLVEMENT

Management recognizes and accepts the responsibility in leading all employees in maintaining a safe culture at Lincoln Generating Facility. Responsibility for safety and health at Lincoln Generating Facility is assigned in a variety of ways.

All employees are responsible for the maintenance, housekeeping, and safety of the site. Therefore to assist in the drive of these responsibilities, the site utilizes not only the Safety Committee to lead in these efforts, but also the Safety Promotion and Recognition Program to reward employees for their efforts. Safety is as much an individual's responsibility as it is a management or company responsibility. All Lincoln Generating Facility employees are expected to leave work in the same physical condition as when they arrived. Therefore, these same employees are responsible to assist in maintaining and improving the sites safety and health programs and are expected to set a safe example for all employees' contractors and visitors.

WORKSITE ANALYSIS

All job descriptions are developed with safety accountabilities as a primary component. Safety procedures indicate positions that are responsible for activities and/or documentation.

Job Safety Analysis (JSAs) are developed by the job experts/employees in each area to identify position responsibilities for safe practices. General employee safety responsibilities are stated in the new employee orientation and weekly/ annual safety training at the site. Safety goals and objectives are part of every employee's performance review.

HEALTH & SAFETY PERFORMANCE GOALS & TRAINING

Lincoln Generating Facility annually sets safety and performance goals for the site. This allows the site to prioritize its Safety, Health, and Training issues and enhances the recognition of safety, as a long-term commitment. All employees are held accountable in reaching performance goals and objectives. These goals and objectives are measured through the employees' annual performance review process. The annual reviews include areas of safety, quality and productivity. Safety, Health, and Training programs and goals are communicated on a regular basis with the employees via new employee orientations, daily meetings, postings and employee evaluations.

CALHOUN POWER

Mike Carter, Plant Manager at Calhoun Power shares his team's safety strategies:

MANAGEMENT LEADERSHIP AND EMPLOYEE INVOLVEMENT

Buy-in. All site members are involved and understand the importance of buy-in to the safety culture and expectation of safety at all levels. If anyone has an idea to improve a process, the team discusses and decides the next step as a group. If there is a way to improve a task or process, we will do it. Tasks need solid procedures in place. During site orientation, we mention our accomplishment of being a VPP Star site and enforce the need to work safely for the contractors.

WORK SITE ANALYSIS

We are constantly looking to ensure no hidden hazards are in our work area. We discuss daily jobs at each morning meeting and remind each other of the safety hazards for the task to ensure the job will get done



safely. We read a portion of the CAMS safety manual at every morning meeting to keep safety fresh on our minds.

HAZARD PREVENTION AND CONTROL

We are required to conduct one safety meeting a month, instead, we do one each Wednesday. Part of this includes a Hazard Hunt, during which each indi-

vidual walks the site specifically looking for any hazards and taking action to mitigate potentially unsafe conditions.

SAFETY AND HEALTH TRAINING

As with all sites, we are required to conduct specific training, either computer based (GPI), or hands on. Tracking is critical to ensure all personnel receive the training required to maintain the knowledge required for proficiency at daily tasks as well as emergencies. We have emergency procedures for any critical scenario we can think of.



D.C. Circuit Court of Appeals Weighs in on Greenhouse Gas Rules for Power Plants

By Derek Furstenwerth, CAMS V.P. of Environmental

On January 19, 2021, the D.C. Circuit Court of Appeals (D.C. Circuit) vacated and remanded to the U.S. Environmental Protection Agency (EPA) the Affordable Clean Energy Rule (ACE), adding the latest twist in a regulatory process for greenhouse gas emissions from the power industry.

ACE was the Trump Administration's replacement for the Clean Power Plan (CPP), which was the Obama EPA's regulation to reduce greenhouse gas (GHG) emissions from the domestic power sector. This decision by the D.C. Circuit on the day before President Biden's inauguration sets the stage for an era of renewed focus on reducing GHGs from the power sector, which could disproportionately impact coal-fired power plants, because they emit higher amounts of GHG per unit of electricity produced.

The key issue throughout is how broad EPA's authority is in addressing GHG emissions from the power sector. The Clean Air Act requires EPA to regulate emissions from existing sources by using the "Best System of Emissions Reductions" (BSER) for carbon dioxide (CO₂)

from the power sector. This section of the Clean Air Act directs EPA to set standards, which are then implemented by states. In the 2015 CPP, EPA stated, "In determining the BSER, EPA looked to the actions, technologies and strategies already in widespread use by states and utilities that result in reductions of carbon pollution. A sophisticated grid connects these power sources together to deliver energy across the country. This interconnection and diversity of generation offer cost-effective advantages and approaches that many states have already shown can provide all the power we need while emitting less CO₂."

Soon after the rule was finalized in October 2015, a large number of states, power companies, and related parties challenged the CPP in court, on a number of grounds, and on February 9, 2016, the Supreme Court stayed the CPP.

In crafting the ACE Rule, the Trump EPA took a starkly different view, based on the premise that BSER could only be determined "inside the fence line." In other words, BSER was limited to those things that could be done at an individual facility. As with the CPP, many entities challenged the ACE rule in court, with the D.C. Circuit issuing their ruling on January 19, 2021, the last full day of the Trump Administration.



NEAR MISS SAFETY EXAMPLE

Contractor fails to sign LOTO clearance and LOTO not verified

WHAT HAPPENED

Work to install new air conditioning units in the plant battery rooms was initiated. There was no electrical power to the newly installed equipment until the tie-in was completed the following month. A lockout/tagout (LOTO) was created and a lock and tag were hung on the newly installed disconnect.

The contractor installing the new air conditioning units continued work on the equipment. The scope of the job safety analysis (JSA) was to "terminate wires", but nobody from the contracting company signed on to the LOTO clearance. A contractor employee stated that his company was not aware a LOTO had been installed on the disconnect to the equipment since they were not responsible for the electrical portion of the work. The electrical portion was completed by another company.

Also, it was later found that the tag installed on the disconnect did not have initials on the "Verified By" portion of tag, indicating the facility LOTO procedure was not followed.

WHAT WAS DONE TO PREVENT REOCCURRENCE

- The employees involved were retrained on the LOTO program to ensure they understood the need to verify the equipment being locked out.
- The individual employee that was involved was counseled for not following the site LOTO program.
- The contractor was contacted to emphasize that the site LOTO must be followed or they will not be allowed back on-site.

A central factor in the D.C. Circuit's decision was EPA's position in ACE that Section 111 of the Clean Air Act only allows EPA to impose standards based on measures that can be applied at an individual source. The court flatly rejected that theory, stating that EPA's interpretation of the statutory text, "is simply not supported by the text, let alone plainly and unambiguously required by it." This is the first time a court has ruled on the merits of either version of power plant GHG regulations, as neither the D.C. Circuit nor the Supreme Court issued an opinion on whether the CPP was legal or not. Although the D.C. Circuit decision struck down ACE, which had repealed CPP, it did not reinstate the CPP.

This decision hasn't taken effect as of the date of this article, as parties have the opportunity to request a rehearing. After that, it is likely that certain parties will petition the Supreme Court for review of the decision. While the D.C. Circuit's action might appear to give the Biden administration a clear path for regulating GHGs from the power sector, the Supreme Court's role is crucial. Its unprecedented stay of the CPP suggests the Supreme Court may have taken a dim view of the CPP, meaning that this protracted battle over EPA's authority to regulate GHGs from the power sector may be far from over.

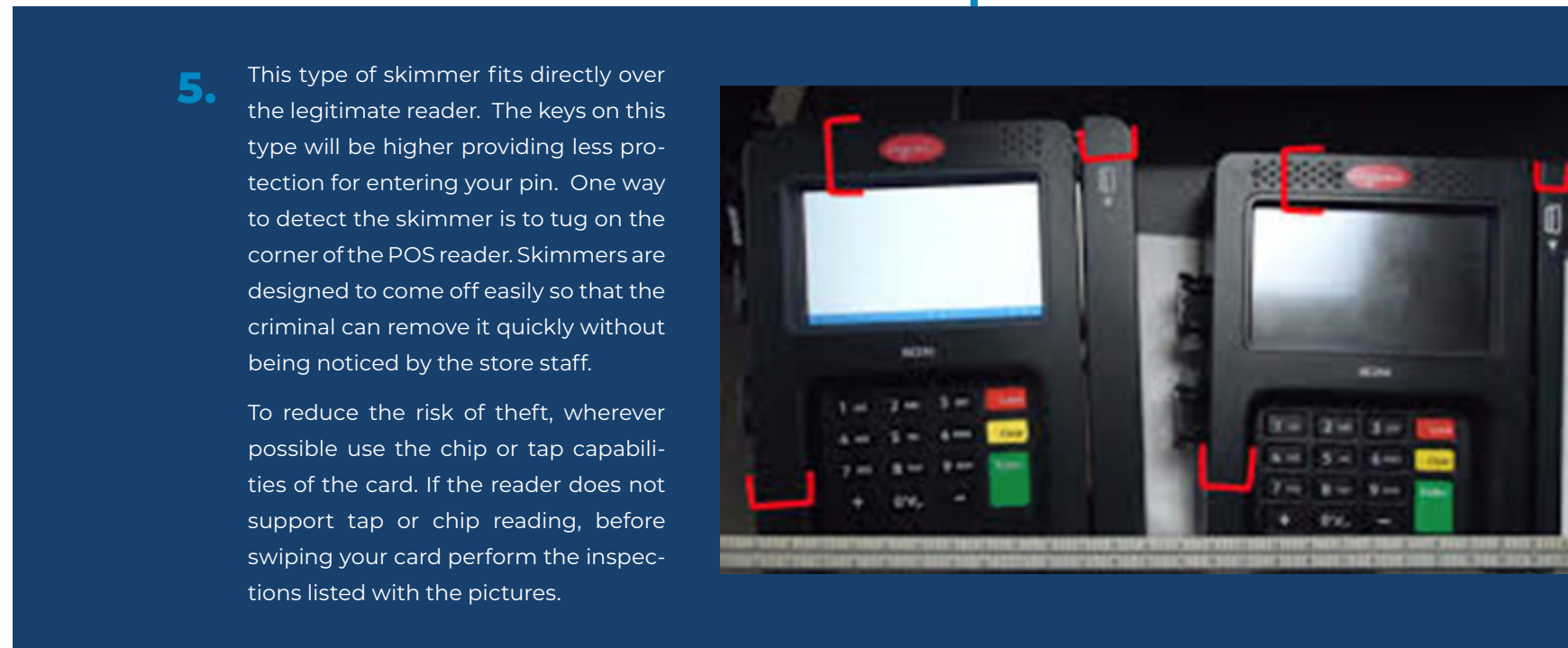
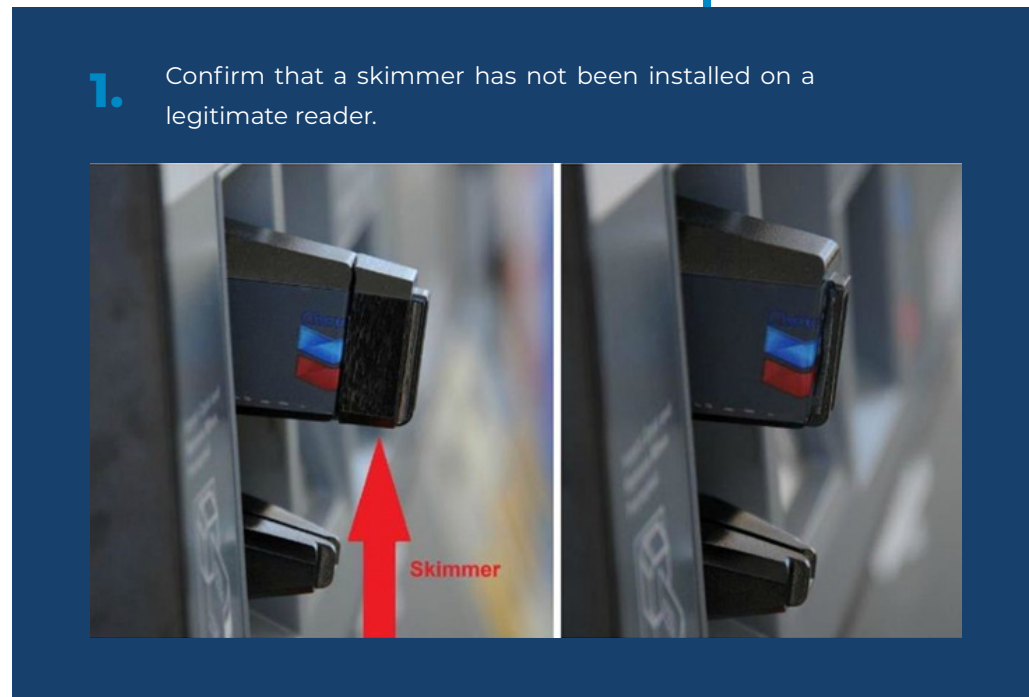
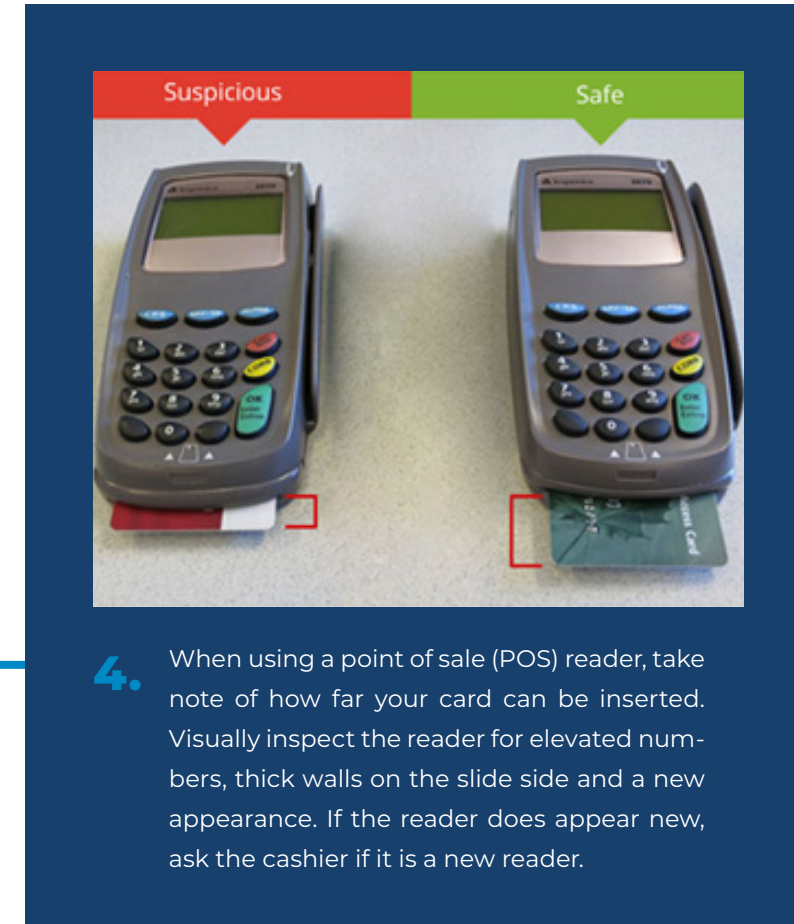
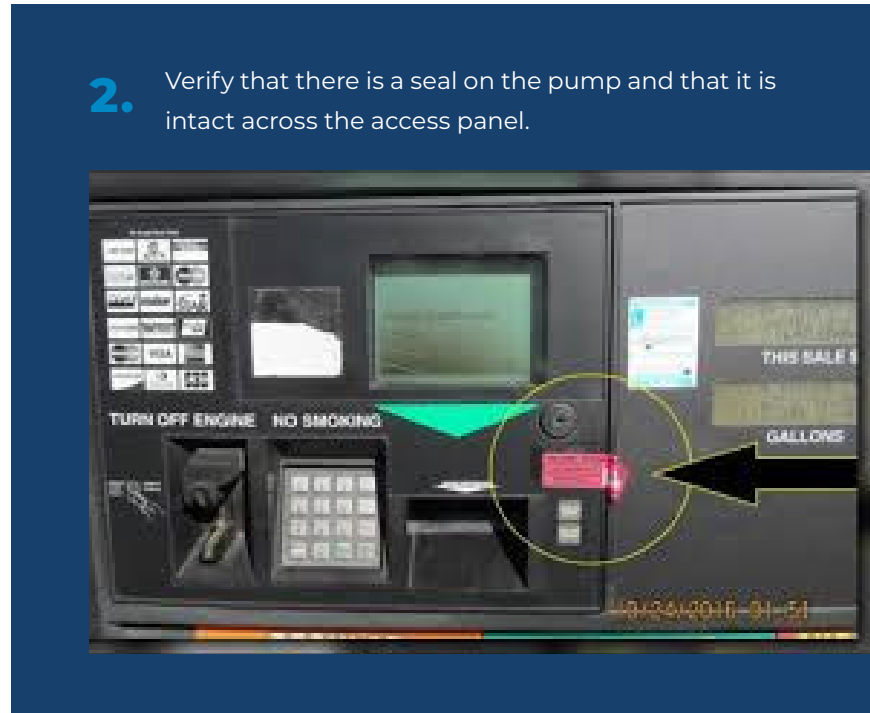
CYBER SECURITY BEST PRACTICES

Credit Card Security

In this fast paced world, it is hard to notice minor changes in tasks that we perform on a routine basis. How many times a day do you swipe your debit or credit card? Have you ever really looked at the reader that you are using?

One of the fastest growing and easiest ways for criminals to get your card information is to install a card skimmer. Skimmers are devices that are installed onto a legitimate reader located at ATMs, gas pumps, and point of sale readers. The skimmer then captures your card number, expiration date, and your name when you swipe your card. With this information, criminals have all of the information they need to create a counterfeit card or shop online.

Here are some examples of what to look for:





From left, GVFD Chief David Cunningham, Griffith Energy Plant Manager Scott Henry and GVFD Assistant Fire Chief David Martin. (Photo by Butch Meriwether/For the Miner)

CAMS Values Community

At CAMS, we empower our employees to pursue creative and sustainable business practices in the field and at our corporate office that contribute to operational excellence, financial performance, a safe workplace, and a better community and environment. The following are several examples of how we seek to enrich the communities in which we live and work.

BARNEY DAVIS

For the past three years, Barney Davis has donated to the Salvation Army and Marine Toy for Tots program. In addition, during the COVID-19 pandemic the plant found both a family and its community in need and supported them with financial contributions.

GRIFFITH ENERGY

Griffith Energy is actively involved with Mohave County, City of Kingman, and the Golden Valley Fire District (GVFD). The natural gas facility recently donated MSA Evolution 6000+ thermal imaging cameras to GVFD. The cameras are used by firefighters

to determine if humans or animals are located in or around a fire zone and to inspect for any remaining hot locations after a fire has been extinguished.

Several other organizations they support in the city and county include Shop with a Cop's Christmas program, Kingman Christian Church's food pantry, Kingman Church of the Nazarene's Angel Tree, and Vietnam Veterans of America in the Golden Valley.

MARIAH NORTH WIND

Mariah North Wind sponsors an annual training event at the site for the Emergency Medical Services (EMS) of Friona. EMS participants receive climb training instruction and climb a turbine to become familiar with the wind turbine operating environment for safety rescue purposes.

HORSE CREEK AND ELECTRA WIND FARM

Horse Creek and Electra Wind farm support their communities with donations to Wilbarger General Hospital, Wilbarger County, Vernon College, Knox County Hospital, Haskell Memorial Hospital, Haskell County Water Supply District No. 1, Knox County and Haskell County.

Want us to highlight your facility's community involvement? Send an email to mjohnson@camstex.com.

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