

EHS&R Newsletter

SECOND QUARTER 2021



Promotion Announcement

We are pleased to announce the promotion of Ben Vodila to Senior Director of Health & Safety.

In his new role, Ben will lead the CAMS Corporate Safety Group, providing oversight and guidance across the CAMS portfolio, while also identifying and implementing corporate Health and Safety strategies and programs.

Prior to joining CAMS, Ben spent 11 years with ExxonMobil, acting as a Senior Project Safety, Security Health and Environment resource for both onshore and offshore projects, and also spent time as the Senior Safety Advisor in an Olefins Facility. Ben served six years as a Captain in the U.S. Army, including deployments to Iraq and Afghanistan. He holds a bachelor's degree in Engineering Physics from the United States Military Academy at West Point.

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EPA Updates the Cross-State Air Pollution Rule at the Last Minute

By Derek Furstenwerth, V.P. of Environmental

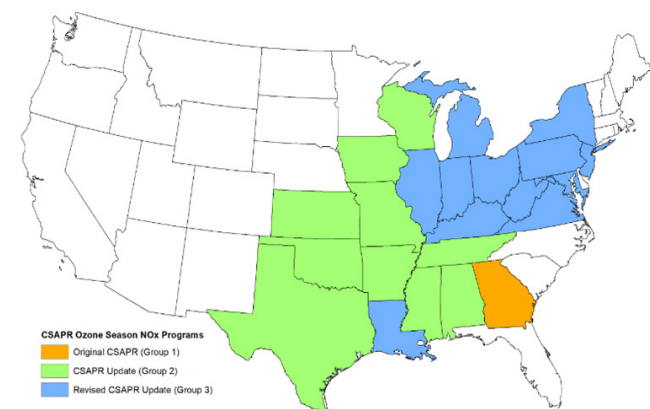
On March 15, 2021, the United States Environmental Protection Agency (EPA) issued a new update of the Cross-State Air Pollution Rule (CSAPR) with changes affecting power plants in the eastern United States, including some potentially significant changes for plants in the Midwest and mid-Atlantic regions. EPA’s “Revised CSAPR Update” was issued in response to the failure to achieve the National Ambient Air Quality Standard (NAAQS) for ozone in a number of areas. Emissions of nitrogen oxides (NOx) in 12 states from Illinois to New York plus Louisiana have been determined to contribute to ozone formation in the areas not attaining the ozone NAAQS. The Revised CSAPR Update will reduce NOx emissions from these states by placing them into a new Group 3 for the Ozone Season (OS) NOx trading program, which places a series of caps on NOx emissions from May - September each year. The NOx emissions caps in Group 3 states are significantly reduced from the caps in prior years. Generally speaking, Group 3 states cannot trade with other states, except for some very limited exceptions, provided as a transition mechanism. The new Group 3 consists of Illinois, Indiana, Kentucky, Michigan, Ohio, West Virginia, Virginia, Pennsylvania, Maryland, New Jersey, New York, and Louisiana. The Revised CSAPR Update takes effect in 2021, and will affect CAMS facilities in the noted states.

STEEP REDUCTIONS IN OZONE SEASON NOx CAPS, LIMITS ON “BANKED” ALLOWANCES AND TRADING

The Revised CSAPR Update implements an overall 39% reduction of NOx allowance budgets in Group 3 states, meaning that 39% fewer NOx allowances will be available for compliance. This has already caused OS NOx allowance prices to increase from around \$300/ton at the end of 2020 to about \$2,500 as of the date of this article.

OS NOx allowances left over from previous compliance years can be converted into 2021 allowances at a ratio of 8:1. In addition, sources have the option of converting allowances from Group 2 states to Group 3 allowances at a ratio of 18:1. This option, referred to as a safety valve, is only available when other allowance options have been exhausted.

CSAPR OZONE SEASON NOx PROGRAMS



One upside of the Revised CSAPR Update rule is that it extends the Allowance Transfer Deadline from March 1 to June 1 of each year. This is the day by which all allowances to cover emissions from the previous ozone season must be placed in compliance accounts for EPA to deduct. This gives sources additional time to evaluate emissions and procure additional allowances if necessary for compliance. This deadline change has been made for all CSAPR rules, not the OS NOx rule.

IMPLICATIONS FOR CAMS-MANAGED OR -OPERATED FACILITIES

The practical impact of this rule is that the cost of compliance may increase. Because the cost of allowances has gone up by a factor of 8 or so, if a facility needs to purchase allowances to be in compliance, those costs will go up. For facilities that are allocated more allowances than they need, there is no direct compliance cost impact, and there could be a small upside from selling excess allowances.

EPA published the initial allowance allocation that will be effective this ozone season. States will have the opportunity beginning with the 2022 ozone season to submit plans for alternative allowance allocation schemes within the states. The following table lists EPA’s allocations for power plants in Group 3 operated or managed by CAMS.

2021 WILL BE UNUSUAL

The rule will take effect 60 days after publication in the Federal Register (April 30, 2021), or June 29, 2021. Because the ozone season will have already started at that point, EPA made a number of accommodations, the most important of which is that EPA will issue supplemental allowances in 2021 to Group 3 sources receiving fewer allowances under the new rule. This will account for the fact that the new rule will take effect after the start of the ozone season, meaning that the previous allocation levels were still applicable for a portion of 2021 the ozone season. Table 1 lists allowance allocations to CAMS facilities for 2021, including the supplemental allocation, and future years.

Because Group 2 2021-2025 allowances were already issued under the previous version of this rule EPA will withdraw those allowances from each plant’s compliance account later this year. For plants that have transacted allowances and have some number of allowances less than what they were originally allocated, the original number of allowances will need to be returned to the account. Please contact Patrick Brosnan (pbrosnan@camsesparc.com) or John Fifield (jfifield@camstex.com) in Environmental Services if this is a concern for your facility.

TABLE 1: OZONE SEASON NOx ALLOWANCE ALLOCATIONS FOR CAMS FACILITIES

State	Plant Name	2021 NOx OS Allocation with Supplement	2022 & after NOx OS Allocation
Illinois	Crete Energy Park	15	15
	Lincoln Generating Facility	13	11
Indiana	Lawrenceburg Energy Facility	179	179
Louisiana	Carville Energy Center	207	207
Maryland	CPV St. Charles Energy Center	33	33
Michigan	New Covert Generating Project	90	90
New Jersey	Woodbridge Energy Center	44	44
New York	Danskammer Generating Station	10	8
Ohio	Darby Electric Generating Station	120	80
	Gen J M Gavin	3318	2222
	Rolling Hills Generating LLC	116	116
	Waterford Plant	89	89
Pennsylvania	Conemaugh	1912	1207
	Keystone	2003	1264

Allowance information is provided for the reader’s convenience, and is publicly available at <https://www.epa.gov/csapr/revised-cross-state-air-pollution-rule-update>.

CAMS Corporate Health Initiative Roll Out: Core Occupational Medicine

By Ben Vodila, Sr. Director of Health & Safety

As CAMS continues its pursuit of Health and Safety excellence for all of its employees, we are excited to announce our corporate-wide rollout of Core Occupational Medicine for all of our facilities. Core Occupational Medicine (Core) is an experienced medical provider in our industry with an exceptional track record. Specifically for CAMS, we have established a 24/7 Telemedicine Hotline to improve the treatment of our team following an incident and provide immediate medical guidance related to any health or safety concerns. Implementation of Core at all facilities also reduces the burden of site personnel providing Care Management and Case Management of their employees, allowing personnel to focus their attention on Site Hazard Mitigation and Incident Investigations.

CARE MANAGEMENT

Care Management is a process to ensure our affected employees receive the proper medical treatment. Many industrial sites, including some CAMS sites, routinely transport injured personnel to the local Emergency Room. While this practice is an understandable method to make sure our workers are fully cared for, there are times when this practice is not the best course of action. In the event of an emergency, where the possibility of losing life, limbs, or eyesight is at risk, 911 should be called, and the emergency providers allowed to take control of the situation. In less serious cases, the emergency room visits may still have limitations:

- As a triage-based system, employee wait time may be longer than the time to provide treatment and relieve pain.
- Emergency room doctors tend to conservatively treat injuries (sutures, antibiotics, etc.) since they won't have the benefit of seeing the patient again to monitor for the development of infection.
- Loss of treatment provider continuity can lead to frustration and miscommunication.
- Emergency visits are typically expensive.



CAMS WORK-RELATED INJURY CARE

1. If an emergency or life-threatening injury - follow your site policy for contacting 911.
2. Notify your supervisor of all incidents.
3. Call 1-866-817-3538.



Implementation of Core at all facilities also reduces the burden of site personnel providing Care Management and Case Management of their employees, allowing personnel to focus their attention on Site Hazard Mitigation and Incident Investigations.

With Core as our Telemedicine provider, we enhance our ability to provide the best possible care opportunities for our employees with optimal follow-up care when needed.

- Core has a Nurse Practitioner review the case as it unfolds, recommending where to get the best treatment for that specific situation.
- Core coordinates with the treating facility while the patient is en route, ensuring immediate medical treatment is available upon arrival.
- Core's hotline provides a Nurse Practitioner 24 hours a day for employees to contact if their condition changes or pain and discomfort unexpectedly increase.
- Core facilitates continuity of medical providers who have already seen our employees to continue treatment in the least invasive manner possible.
- Core's Occupational Physicians have a professional understanding of the hazards and work associated with power generation facilities.

CASE MANAGEMENT

Case Management is the vital but often overlooked function of documenting how our employees are treated and classifying the incidents. Case Management usually falls to the site EHS representatives. With Core Occupational Medicine managing our cases, this administrative burden is removed from our sites. Core discusses the cases directly with the treating physicians and gathers all pertinent medical records. Relieving our site EHS Professionals of this time constraining activity allows them to remain focused on proactively mitigating site hazards for current work activities and being an asset in the field. In addition, Core maintains all of our employee case files for easy access in the event they are needed later by the sites.

PATH FORWARD

Our Corporate Health and Safety Team has already reached out to all of our sites to get them enrolled. Information provided to date was forwarded to our Core Medical Team. Core is validating their existing relationships with occupational physicians located near our sites across the country and identifying additional resources as needed. Also, the Health & Safety Team is assisting with purchase order setups so Core can provide services for all of our locations. If you have any questions or concerns, please reach out to your Corporate Health and Safety representative, or contact Ben Vodila (bvodila@camstex.com), and we will happily address your needs.



Cybersecurity in Power Plants: Is my facility vulnerable?

By Matthew Pacobit, Sr. Director of Regulatory Affairs

We have been getting many questions from clients about cybersecurity and the cyberattacks that have been widely reported in recent news. Most clients want to know why these attacks are happening all of a sudden and whether or not their plant is vulnerable.

To begin, the media may have just started reporting some of these high-profile attacks, but if you read public companies past disclosures, you will find that this has been going on for years. Additionally, cyberattacks have been growing exponentially and with the rise of cryptocurrency, criminals are now able to demand payments that are almost completely untraceable.

With regards to the vulnerability of clients' plants, the answer is a bit

more complicated and there are a few key points that need to be made clear.

First, all power plant control systems are vulnerable and there is no such thing as a perfectly secure system. Even systems that are air-gaped are still at risk of transient cyber assets and removable media (laptops, tablets, phones, USBs, etc.).

Second, power plant control systems are not the same as IT business networks. Plant control systems are made up of many customized components from a wide variety of vendors. Some of these components might be off-the-shelf computers, but they cannot be secured using the same solutions as business network computers. I have seen firsthand, a cy-

bersecurity software try to request information from a plant controller on an operation network. The controller interpreted it as an unknown error, failed, and triggered a backup. The software then did the same thing to the backup and took down the entire system.

Because of the risk to the control system, the CAMS cybersecurity team separates out the business network from the operational network when looking at cybersecurity solutions. Most of our clients currently use CAMS Bluewire Technologies for their business network cybersecurity, however, each operational network is unique. There needs to be a discussion on risk mitigation vs. cost for each control system and each cybersecurity solution. Some control systems can be secured with a firewall or data diode, while others are better off with firewall monitoring and/or whitelisting. Additionally, most power plant control systems have at least some components and software that are older than 5-10 years, so determining the right fit is a personalized process.

In the end, securing the power plant control system not only reduces the risk of down time but also reduces the risk of equipment damage, making cybersecurity and risk mitigation worth the cost.

For more information, contact Matthew Pacobit (mpacobit@camstex.com).

CYBERSECURITY BEST PRACTICES Network Security: Removable Media Devices

Although CAMS protects our networks and computers with firewalls, antivirus, and malware detection tools, it is still essential that we be diligent in protecting ourselves from the constant threat of a cyberattack.

To prevent any transmission of viruses or malware onto corporate networks, we need to ensure we follow our cybersecurity policies. Please review the

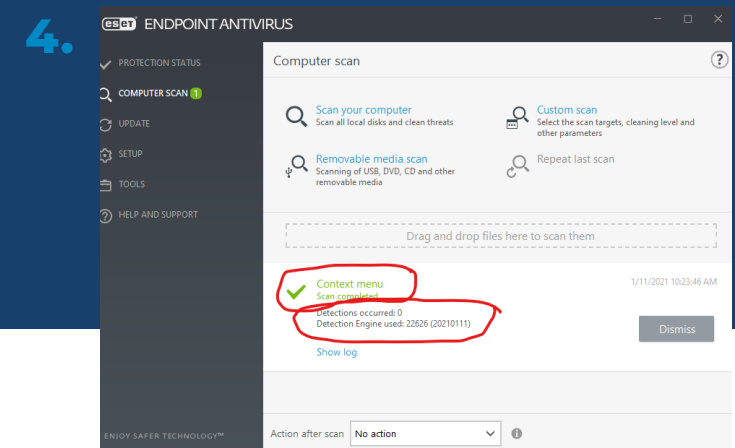
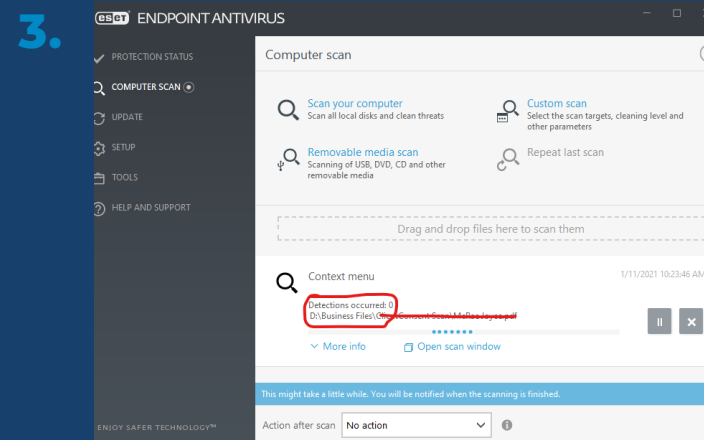
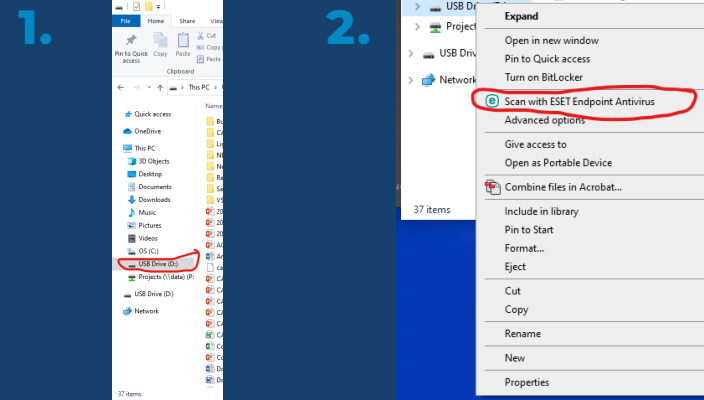
CAMS Corporate Cybersecurity Policies document (distributed via email company-wide on June 11).

Removable media devices (thumb drives, CD/DVD, external hard drives, etc.) are commonly used in our work environment because they are easy to use and have large data storage capacities. However, they are also some of the most common devices exploited by cybercriminals. Employees must follow security protocols before using any removable media devices that connect to our network.

Our Cybersecurity Policy requires a scan of any such media before files are opened. Complete the scan using the following steps:

1. Open file explorer and locate the media that you need to scan. For this example, we are going to scan an inserted USB drive.
2. Right-click on the desired media, locate the installed antivirus software scan command from the menu and select.
3. The software will then perform a scan of the media you have selected.
4. Wait for the scan to complete and ensure that there is no threat. Once this is verified, you may open any file.

This procedure is critical to ensuring that we mitigate the risk of malware on our network devices, especially when sharing a media device between different computers, such as receiving files from clients or contractors.



INJURY SAFETY NOTICE

Recordable: Awkward Positioning While Operating a Valve

WHAT HAPPENED

An equipment operator was assigned to close valve CMO-102. To access the valve, the operator climbed up a ladder to a platform with restricted access. To close the valve, he had to get on his knees, with his left arm supporting his upper body as he pushed down on the 18" valve wrench. The valve hand-wheel could only move 3-4" before repositioning of the valve wrench was required. It took the employee 15-20 minutes to get the difficult-to-operate valve closed.

While working on closing the valve, the employee felt a pop and tear in his left shoulder. Ultimately, repair of the injury required surgery.

WHAT WAS DONE TO PREVENT REOCCURRENCE

- Purchased and installed remote operator for this valve.

POINT OF DISCUSSIONS FOR SITES

- Are your PMs for greasing valves completed according to the procedure? Do your procedures need updates?
- Is awkward positioning discussed at your location as a potential hazard requiring mitigation?
- Do you have valve locations that need to be evaluated for additional PMs?



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