

EHS&R Newsletter

SECOND QUARTER 2022

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EHS&R Summit

After a two-year hiatus due to COVID, the annual Environmental, Health, Safety and Regulatory (EHS&R) Summit was held the week of June 6 in Orlando, FL.

There were nearly 100 participants representing CAMS fossil fuel generation, renewable sites, midstream, and corporate offices. Each day featured specialized training and information sessions related to an EHS&R group. Topics included NERC training and regulatory overview, health and safety, and environmental. The candid dialog during the presentations and the collaborative sidebar conversations throughout the week will keep us focused and maturing as we strive for daily EHS&R excellence.



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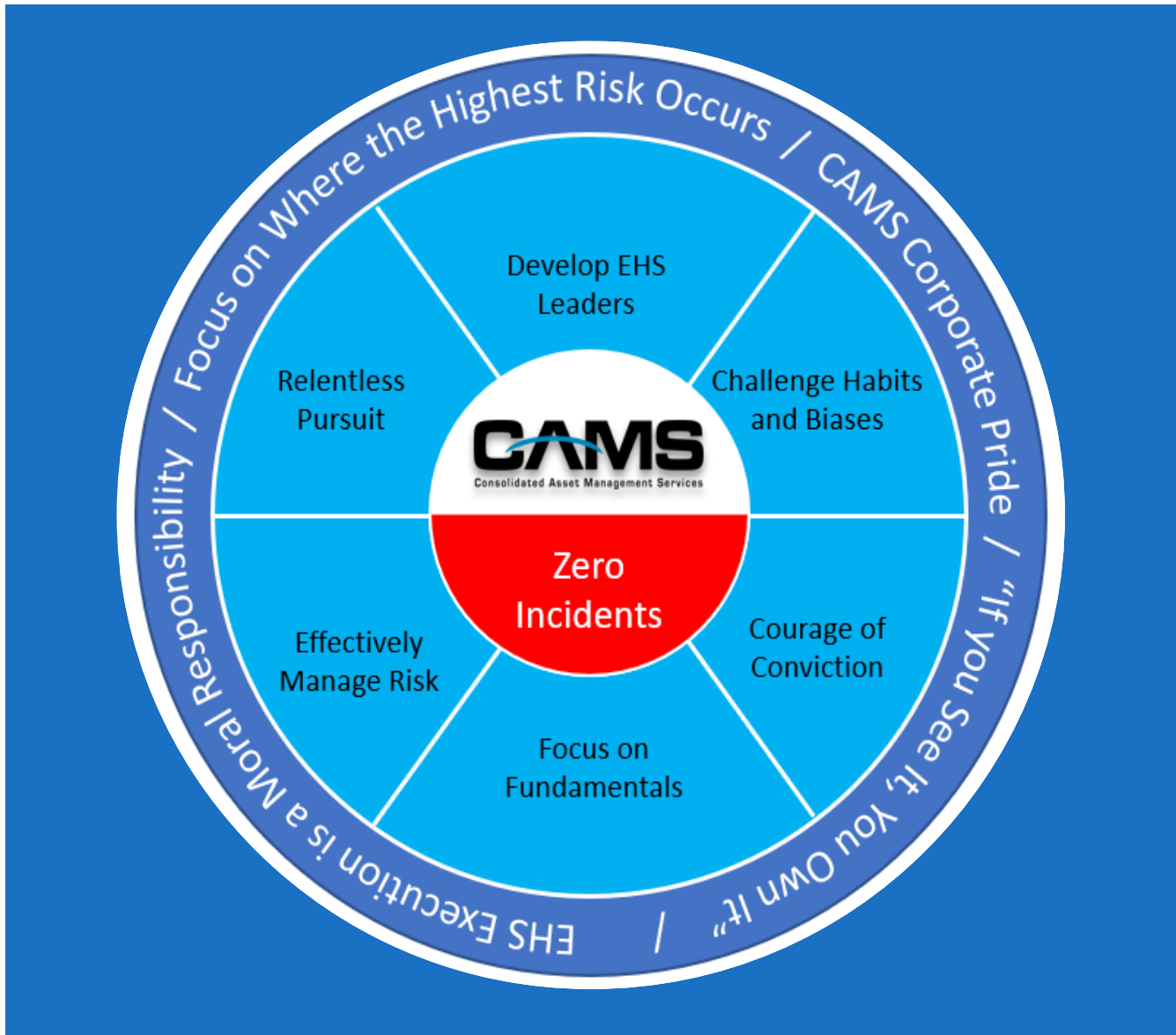
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CAMS EHS Vision

By Ben Vodila, Vice President of Health & Safety

CAMS believes that the health and safety of our employees, contractors, customers, and communities is paramount, and we are committed to respecting and protecting the environment in how we conduct our business.



To focus our efforts and provide better guidance on how to achieve world class results, CAMS EHS teams have unveiled the CAMS EHS Vision and discussed how to consistently apply these tenets with our plant managers and EHS managers at the corporate EHS&R Summit.

The center of our model emphasizes our end goal – zero incidents. When applied properly, every one of our facilities can work in an environment with no injuries, illnesses, environmental spills, permit exceedances, or any other enforcement actions taken by regulatory agencies. However, to reach that goal, we

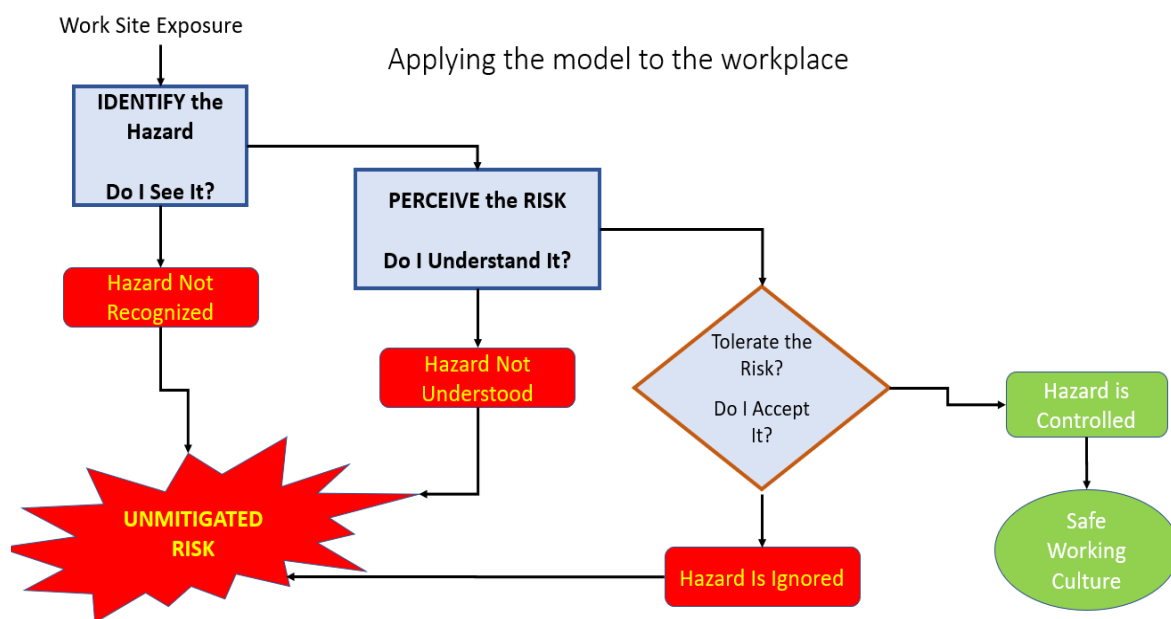
must focus daily on our six center pillars, all of which require action by our leadership to reinforce them culturally throughout the workforce.

All center pillars are equally important, so to explain them in no particular order, we start with **Challenging Habits and Biases**. Even today, many facilities have a false sense of security that they are already achieving EHS excellence due to past performance. We want to reinforce the belief that an absence of incidents could mean you are working safely and environmentally friendly – or it could mean you have been lucky and all the holes in the Swiss Cheese Model haven't lined up properly yet. EHS excellence requires a proactive mentality to seek out EHS hazards daily and put-up proper defenses against them.

Focusing on Fundamentals – while sounding cliché – requires a daily approach with three checks in place to

themselves if something else is present that wasn't previously discussed and mitigated. We train our employees rigorously to understand EHS hazards in the workplace, which should also be reinforced in the Pre-Job Brief and job safety analysis (JSA) process. The third component is a cultural level that leaders should be cognizant at all times. Employees may say they have been doing it a certain way for 20 years or feel confident their personal protective equipment will protect them, or even if something happens, they're confident in the emergency response. We need to reinforce that if anyone sees an uncontrolled hazard, they stop work and put effective protection measures in place.

Effectively Managing Risk puts the responsibility on plant leadership to protect their employees through the hierarchy of controls. It is exceedingly difficult to eliminate or substitute hazards. Facilities need to



ensure hazards are identified, understood, and controlled. Both management and the workforce need to actively view the worksite. The majority of hazards should be discussed during their Pre-Job Briefs; however, our employees and contractors should still verify

effectively put-up administrative controls against identified hazards in the facility until they complete the work order required to put up the full engineering control. Identified engineered controls, like machine guarding should have preventative maintenance

in place to regularly inspect and ensure the control hasn't degraded over time.

CAMS will continue to train its site management team and provide tools for them to **Develop as EHS Leaders**. We will also reinforce that being an EHS leader is not a check-the-box exercise. If a plant manager were only to discuss safety during meetings or during a toolbox talk, employees would not receive the message that this is important or that a cultural shift needs to occur. Employees typically want to work well and give their management what they want. Being out in the field, discussing hazards, reviewing JSA's in the field, asking employees how hazards are controlled frequently will shift the dynamic and employees will work more proactively in EHS excellence conditions. We expect our leaders to not only talk the talk but walk the walk during execution as well.

Courage of Conviction should reinforce our expectation that we have a moral obligation to intervene when we see an unmitigated hazard and the work environment is unsafe. Simply having a Stop the Job Authorization process at work does not ensure it will be effectively used. Leaders need to reinforce their expectations. The most effective method to achieve this is through casual conversations at the work site with their employees. Asking a question like, "Have you observed any work activities where you wished you would have stopped the job?" or discussing the need to prioritize EHS performance over production during their Pre-Job Briefs goes a long way. Also, when an employee stops the job, we need to thank them immediately for having the courage to act and recognize them in some form or fashion. When one does observe someone working in an unsafe or environmentally unsound behavior, we need to take the time to coach them, explain why what they're doing is wrong, and tell them how we want them to execute it in the future.

Relentless Pursuit of Excellence means incorporating the above principles into daily behaviors and those of plant staff. Simple behaviors executed con-

sistently can transform our results and result in consistent EHS excellence.

The **Outer Ring** of our EHS Vision is a philosophical mindset we expect our leaders to reinforce culturally to their employees and even contractors. EHS excellence is a moral responsibility to our employees and our communities. While there are regulatory fines to compel employers to perform, that is not why we do it. We need to protect people to provide the commodities they need without disrupting their lives or the families of our employees through an injury. We expect our leaders to focus their efforts where the highest risk occurs. This takes effective planning to understand what high risk activities are scheduled and make time to be a part of the planning as well as the execution in the field. "If You See It, You Own It" applies to everyone. An employee cannot observe something wrong and assume its resolution is someone else's responsibility. If an employee identifies a hazard, they should immediately notify their supervisor to get it properly addressed. Finally – we expect all our facilities and employees to take pride in being a part of CAMS. This organization will continue to strive for excellence in all we do, and we need all our employees to take pride in who we are and how we want to execute.

PATH FORWARD

CAMS EHS will continue to focus our efforts and review our performance based on this vision. Additional training and discussions will progress as we strive for world class results. If you have any questions or concerns about expectations or how to effectively use this model, please contact us at safety@camstex.com, or contact Vice President of Health & Safety, Ben Vodila (bvodila@camstex.com) or Vice President of Environmental, Derek Furstenwerth (dfurstenwerth@camstex.com).



CAMS Strategic Control Services

By Matthew Pacobit, Vice President of Regulatory Affairs and Remote Operations

CAMS is pleased to announce a new service offering that will help our internal and external clients protect against ever increasing cyber threats.

CAMS Strategic Control Services is now available to perform remote operations functions and cybersecurity monitoring for Operational Technology (OT) systems. This new offering will provide cybersecurity solutions for low impact BES cyber assets, ensuring a more secure OT environment. Our remote operations center is staffed 24/7 and will monitor and respond in real time to threats. The services became operational in May 2022, and we are excited for the opportunities this provides CAMS and our clients. For more information, contact Vice President of Regulatory Affairs and Remote Operations, Matt Pacobit (mpacobit@camstex.com).

Proposed New Rule: MACT YYYY

By Michael Kreter, Environmental Associate

The National Emission Standards for Hazardous Air Pollutants Rule for Stationary Combustion Turbines (CTs), effective March 5, 2004, was promulgated to address findings by the Environmental Protection Agency (EPA) that stationary combustion turbines are major sources of Hazardous Air Pollutants (HAP) such as formaldehyde, toluene, benzene, and acetaldehyde. This rule can be found under Title 40, Chapter 63 of the Code of Federal Regulations ([40 CFR 63](#)) Subpart YYYY (YYYY). It established national emission and operating limitations for eight categories of turbines.

Most relevant for our fleet, the rule established an emission limitation for formaldehyde of ≤ 91 parts per billion by volume, dry, except during turbine startup, for units affected by the requirements of the rule. However existing turbines, defined as a stationary CT

for which construction or reconstruction commenced on or before January 14, 2003, are exempt from all YYYY requirements.

Shortly after promulgation of the rule and after a request to de-list several categories of affected CTs was submitted to EPA, EPA issued a stay on nearly all YYYY requirements. The stay was issued for all *major source*¹ stationary CTs that:

- 1) Commenced construction or reconstruction of the unit after January 14, 2003²; and
- 2) Are gas-fired turbines with oil-firing capabilities, but for which oil is burned across all CTs in aggregate of ≤ 1000 hours annually; and
- 3) Utilize a lean premix or diffusion flame method of combustion.

On March 9, 2022, EPA lifted this stay on YYYY requirements, causing the stayed requirements to come into effect. Due to the length of time for which these requirements did not need to be met, it is likely that the requirements under YYYY are not known or understood by potentially affected facilities or units. Furthermore, pursuant to 40 CFR 63.6095(a) (3) and established in the Final Ruling on the stay, YYYY requirements became effective on March 9, 2022. Per [40 CFR 63.6110\(a\)](#), [the initial performance test and other initial compliance demonstrations for YYYY must be completed no later than 180 days from March 9, 2022](#). Therefore, initial compliance demonstrations must be completed by September 5, 2022.

An applicability analysis is strongly encouraged for any facility that is unsure of their combustion turbine's status under this rule.

¹ A major source is a unit or facility that emits or has the potential to emit ≥ 10 tons per year of any single HAP or ≥ 25 tons per year of any combination of HAPs.

² This definition describes new or reconstructed CTs under YYYY

Proposed New Rules: OOOOb/OOOOc

By Lucian Hill, Senior Environmental Associate

On November 15, 2021, the United States Environmental Protection Agency (EPA) proposed Emission Guidelines and updates to the oil and gas sector New Source Performance Standards (NSPS) to further reduce greenhouse gas emissions from certain emission sources. The goal of the proposal is to significantly reduce methane and volatile organic carbon emissions from both existing and new sources within the natural gas and oil industry. EPA intends to publish a supplemental proposal later this year to gather comments to help them discover additional areas for pollution reduction, including additional sources not yet covered under the present proposals. EPA has stated that the goal of these proposals is to be “far-reaching and ambitious” yet “anchored in science and the law.”



The proposed new rules are referenced as NSPS Subparts OOOOb and Emission Guidelines Subpart OOOOc. Both proposed rules apply to well sites,

gathering, boosting compressor stations, processing segments, transmission, and storage of oil and natural gas. OOOOb applies to new, modified, or reconstructed sources after November 15, 2021. OOOOc applies to existing sources on or before November 15, 2021. EPA estimates that methane remissions will be reduced by 41 million tons by the end of 2035 because of these two rule implementations. Additionally, EPA estimates that there will be \$4.5 billion (about \$14 per person in the U.S.) in overall climate benefits per year, with the total net benefits of the proposal valued at \$49 billion (about \$150 per person in the US) by 2035.

Key components of the proposed rule include the following:

- Fugitive emission programs at compressor stations
- Focused emission reduction efforts at larger facilities
- Flexibility to use advanced leak detection technologies

EPA has determined that 86% of all fugitive emissions are from well sites that generate more than 3 tons in a year. These facilities will have to use Method 21 or optical gas imaging quarterly to promptly identify leaks and attempt repairs. Presently, EPA continues to evaluate the monitoring frequency of well sites greater than 3 tons per year, but less than 8 tons per year.

The proposed rule will also require all new and existing pneumatic controllers at processing, transmission, storage, and production facilities, to have zero-emitting technology. Venting from an oil well will also be subject to capture and recovery with the mandatory rerouting of the gas to either a sales line, other useful purposes, or a control device capable of 95% destruction such as a flare or thermal oxidizer. Additionally, there will be strengthened requirements for storage tanks at both existing and new facilities.

ESG Case Studies

CAMS believes in and supports doing good in our communities and our facilities are quite active in the communities that they serve. There are numerous examples of volunteerism, donations, and environmentally beneficial projects that go on throughout the year. One of CAMS' Environmental, Social and Governance (ESG) Program objectives is to collect and communicate examples of community and environmental stewardship. Each quarter we ask our facilities to report what they are doing to demonstrate ESG involvement. This quarter we are featuring a few examples of the feedback received. These examples come from Conemaugh Generating Station, Crockett Cogeneration, Keys Energy Center, Middletown Power, and Lawrenceburg Power Plant. Please send information related to any future activities at your facility to Mona Johnson (mjohnson@camstex.com).

CONEMAUGH GENERATING STATION

Conemaugh Generating Station (Conemaugh) is a 2,500-acre site located along the Conemaugh River, 13 miles northwest of Johnstown in New Florence, PA. The station has two identical coal-fired units able to produce a total of 1,700,000 kWh and a 400-acre landfill for managing ash, FGD material and gypsum. The facility is jointly owned by a consortium of different parties and operated by CAMS.

In March 2022, Conemaugh hosted six advanced placement environmental students from Somerset High School. Plant personnel provided the students with a technical overview of the power plant that included topics such electricity distribution, general process descriptions for power generation, wastewater treatment and emissions controls, and coal handling and disposal. Following the technical presentation, the students were given a tour of the plant. The students were very engaged during their visit and asked a number of questions on topics ranging from the future of the power market to where the power will come from once the Conemaugh plant is shut down.

According to Strategy and Compliance Manager, Joe Kushner, the students were very interested and grateful for the tour.



CROCKETT COGENERATION

Crockett Cogeneration (Crockett) is a 240 megawatt (MW) natural gas-fired combustion turbine electrical power generating plant located in the unincorporated area of Crockett, Contra Costa County, CA. The plant is managed and operated by CAMS.

Crockett has a long-standing partnership with the California Maritime Academy in Vallejo California with an engineering internship program at its center. This successful hands-on engineering internship trains students in the management, operations and maintenance skills required for power facilities. Crockett received a Best Practices Award for Workforce Development for this intern program from the Combined Cycle Journal in 2013.



Recently, Crockett received a call from the Cal Maritime Academy asking if it could help four of their senior students. Due to COVID restrictions these students were unable to complete the required number of days at sea to meet graduation requirements. The Crockett team stepped up to help these students meet the graduation requirements by hosting them at the plant to shadow the operators and learn about the cogeneration facility while logging the field hours necessary.

In addition, a current Cal Maritime Internship student of the past two years recently accepted a job offer for a full-time position at Crockett from CAMS. He graduated on May 7 and started full time at the plant on May 9. CAMS benefits by bringing in a new operator that already has two years of experience at the plant.

KEYS ENERGY CENTER

The Keys Energy Center is a 2x1 natural gas-fired combined cycle power generating facility in Brandywine, MD. The station generally runs on a load-following schedule and started commercial operations in 2018. The plant is operated by CAMS.

The plant has worked diligently over the last four to five years to restore these areas...

Three wetlands mitigation sites were established in and around the station during the permitting process



to construct the Keys facility: the Hollybrook site, the Mitigation site, and the Pipeline Extension site. The plant has worked diligently over the last four to five years to restore these areas to meet all Army Corps of Engineers and Maryland Department of Environment requirements.

The Hollybrook site is the first of the three sites to be closed and offers many ecological benefits as a contiguous forested wetland habitat. The site expands habitat adjacent to a historical bald eagle nest and associated protection zones. It protects and improves water quality and creates habitat for two state-listed fish species – the flier and the ironcolor shiner – and several state-listed plants. Overall, the site creates forested wetlands, reduces forest fragmentation, and creates additional Forest Interior Dwelling Bird species habitat by converting nearly 13 acres of open agricultural land and a significant area of edge habitat into forest interior habitat.

The other two locations are on track to be closed out successfully after 2022.

MIDDLETOWN POWER

Middletown Power is situated on the western bank of the Connecticut River, in Middletown, CT. The plant consists of three steam electric generating boilers (Units 2, 3 and 4) and five combustion turbines (Units 10 and 12-15). It has one auxiliary boiler (Unit 4A) and two glycol boilers used to heat fuel oil and provide station heat. There are four No. 6 oil tanks of various sizes for a total of 31,710,000 gallons. Total generating capacity is 953 MW. Middletown Power is equipped with a fuel oil barge dock, but fuel oil barges are unable to traverse the river as far north as Middletown, so fuel oil is received at Montville, then delivered by truck to Middletown.

“I am a firm believer that with every interaction you leave an impression on those around you.”



Middletown Power employees actively support community organizations such as the Xavier High School Robotics Program and the Middlesex County and New Haven County 4-H Clubs through volunteerism and financial donations.

Plant manager, Kurt Huizing, highlighted the importance of Middletown Power's community involvement, "I am a firm believer that with every interaction you leave an impression on those around you," he said. "It's up to you to make it a good one. In the smaller communities that most of our facilities operate in, the local citizens will at some level associate the plant with their feelings about the employees. We have a much smaller community presence currently than we have had historically, due to reduced staffing, so that makes it even more important that even casual interactions are positive."

The students learn project management, communication, organizational, and technical skills...

Xavier High School Robotics Program — The Xavier High School Robotics Program involves 50 high school students who design, build, program, and test five robots that compete in tournaments requiring the performance of a variety of complex tasks. The students learn project management, communication, organizational, and technical skills that help them beyond their high school careers. Middletown Power supports this organization financially and with

volunteer support by Nick Mainetti, Maintenance Manager, who serves as a mentor for the program.

The Middlesex County and New Haven County 4-H Clubs – Middletown Power provides financial support to the fair that is organized by the Middlesex County and New Haven County 4-H Clubs. Each year local youth plan the fair to showcase their projects related to agriculture, leadership, communication, arts, and science. The mission of 4-H is to assist all youth ages 5 to 18 in developing leadership and life

skills that help them to become self-directing, productive, and contributing members of their families and communities. The financial support provided by Middletown is particularly important at this time due to limitations imposed by COVID restrictions for the past two years. Huizing added, “It is imperative that we support the next generations coming up via the local STEM or 4-H programs, as well as any number of other community volunteer programs. They are the future, and we need to give them every opportunity to succeed and exceed expectations.”



LAWRENCEBURG POWER PLANT

The Lawrenceburg Power Plant is situated on approximately 85 acres in Dearborn County, IN. The facility is a 1,200 MW combined-cycle natural gas-fueled power plant that produces electricity through the utilization of advanced combustion turbine and steam turbine combined-cycle technology. The plant is owned by Lightstone Generation and is operated by CAMS.

Lawrenceburg Power employees are key contributors to their community. Each year they volunteer for the River Sweep cleanup event organized by the Ohio River Valley Water Sanitation Commission, the Foundation

for Ohio River Education, and the environmental protection agencies from Illinois, Indiana, Ohio, Kentucky, West Virginia, and Pennsylvania. Although the event

used to take place on a single day, Ohio River Sweep now covers the period of March through October to have a larger collective impact than a one-day event could previously offer. This year, Lawrenceburg Power held their event in conjunction with Earth Day. Fourteen volunteers collected trash along a one mile stretch of shoreline between Hollywood Casino and the Dearborn Trailhead along the Ohio River in downtown Lawrenceburg. Ultimately, the team disposed of enough trash to fill a 30-yard dumpster.

Over the years, volunteers like those from Lawrenceburg have made a significant positive environmental impact over the entire Ohio River Basin, helping preserve the cultural, ecological, and economic value of the area.



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