

# EHS&R Newsletter

THIRD QUARTER 2022



## ESG Commitment

### Donations support hurricane relief in Puerto Rico and Florida

CAMS is dedicated to supporting the communities in which we operate. CAMS operates the San Fermin Solar Farm, a 27 MW utility-scale solar asset in Loiza, Puerto Rico owned by Stonepeak, a leading alternative investment firm specializing in infrastructure and real assets. This asset provides renewable energy to the Puerto Rico Electric Power Authority.

In early September, Hurricane Fiona struck the island of Puerto Rico, damaging homes and businesses while leaving millions of people without water or electricity. Due in large part to the efforts of CAMS, its employees, and Stonepeak, the San Fermin Solar Farm was the first renewable electric generator reconnected to the grid after Hurricane Fiona made landfall. Additionally, CAMS and San Fermin teamed up to provide \$20,000 for the humanitarian support of those impacted by Hurricane Fiona. The cash donation was made through PRXPR Puerto Rico, a no-overhead fund that invests 100% of donations received to support essential needs related to food and agriculture, clean water, and fuel/renewable energy initiatives.

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### **Mona Johnson, P.E.**

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## NEW EHS&R Employees

As the CAMS fleet of energy assets grows, we continue to add staff to our EHS&R team. We are pleased to introduce the new individuals providing compliance services to our facilities.



**PATRICK  
BLANCHARD**

### **PATRICK BLANCHARD**

Patrick provides environmental compliance, due diligence, and regulatory services for the CAMS environmental group. He has worked primarily in the power generation industry with over 30 years in the EHS field. Patrick came to CAMS from Calpine, where he was responsible for EHS compliance, permitting, regulatory advocacy, and governance for power generation operations in the Central and Eastern U.S. Patrick graduated from Southwest Texas State University with a bachelor's degree in geography. In his current role as Senior Director, Patrick is responsible for corporate environmental support of Lightstone, Generation Bridge I and II, New Covert, and Coal Plant operations.



**ANGELA  
KIM**

### **ANGELA KIM**

Angela Kim supports the Oswego, New Haven and Bridgeport sites and provides back-up support to Connecticut plants. Angela has over five years of experience, primarily in the northeast region ranging from environmental compliance and remediation to construction health and safety. Angela has assisted in managing major RCRA and CERCLA-contaminated remediation projects for an energy company involving former Manufactured Gas Plants (MGP) and decommissioned substations. Trained as an environmental geologist, Angela is also experienced in fieldwork and data collection, reporting of hazardous site investigations, Operations Maintenance & Monitoring (OM&M) of in-situ remediation systems, and analysis of lab data.



**KYLE  
TOBIAS**

### **KYLE TOBIAS**

Kyle Tobias, Supervisor of NERC CIP Compliance, has over 20 years of O.T. cybersecurity planning, operations, program execution, training, and audit experience across the fields of energy, maritime, banking and finance, and telecommunications. He holds a bachelor's degree in Communication from Oglethorpe University, and is completing his Master of Science in Cybersecurity at the Georgia Institute of Technology. Kyle is credentialed as a Global Industrial Cyber Security Professional (GICSP) and a Certified Information Systems Security Professional (CISSP). Kyle provides CIP compliance and O.T. security support for the fleet of CAMS-operated facilities.

## NEW EHS&R Employees (cont.)

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### KARL PFLUGHAUPT

Before joining CAMS, Karl was an Environmental, Health, and Safety professional with more than 12 years of experience in diverse, safety-focused roles in manufacturing while directly overseeing and positively impacting safety management systems. He has in-depth experience in Personal Safety, Human Performance, and Safety-Critical Work Execution spanning the globe, and will be utilized in developing Corporate Safety Initiatives and project support. He holds a bachelor's degree in Business Management, specializing in Emergency Management, and is a Certified Safety and Health Official. Karl will focus on project support for Generation Bridge II and Parkway Generation.



### MARK FISHER

Mark Fisher began work in the consulting field as an Environmental Associate after graduating from The Ohio State University with a B.S. in Environmental Science. Mark gained experience in environmental consulting at RSB Environmental. He worked primarily on Phase I and II Environmental Site Assessments but also learned EHS operations, Title V air monitoring, Tier II reports, SWPPPs, and SPCCs. Mark is excited to continue his professional development with the CAMS Environmental team and hopes to get a P.G. license. As an Environmental Associate for CAMS, Mark supports the Mulberry, Orange, Orlando and Vandolah facilities as well as Castle Gap and the Sequitur portfolio.



### JEREMY SEILEY

Before joining CAMS, Jeremy spent 13+ years with ExxonMobil, supporting Chemicals & Global Projects Safety Health and Environment Personal Safety Group. He has in-depth experience in Personal Safety, Human Performance, Regulatory Compliance, and Safety-Critical Work Execution, and will be utilized in developing Corporate Safety initiatives. Jeremy served 10 years as a Sergeant in the United Army and Texas National Guard. He holds a bachelor's degree in Business Management, a master's degree in Risk Management & Business Continuity, and the Certified Safety Professional (CSP) designation. Jeremy will be supporting CAMS Midstream, Danskammer and Generation Bridge I east coast facilities.

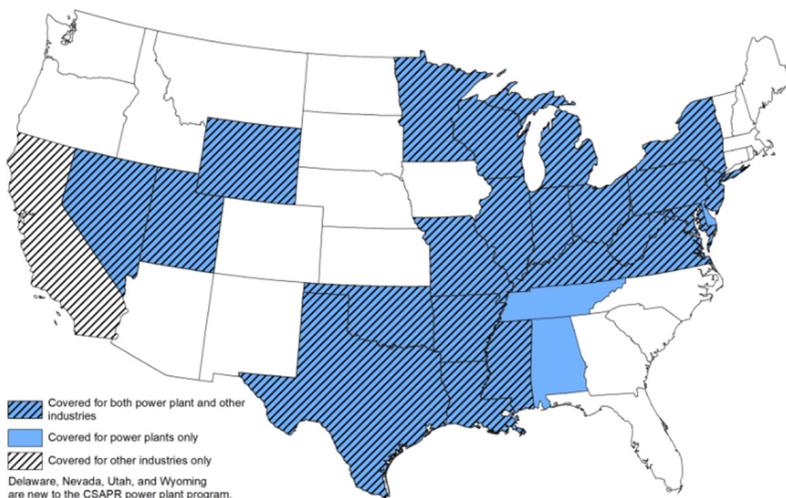
## ENVIRONMENTAL

### Good Neighbor Plan Update

By Patrick Blanchard, Senior Director, Environmental Services

The Clean Air Act's "good neighbor" provision requires EPA and states to address interstate transport of air pollution that affects downwind states' ability to meet National Ambient Air Quality Standards (NAAQS). In February of this year, EPA proposed a rule that would significantly change the Cross State Air Pollution Rule ("CSAPR") by adding 12 new states to the CSAPR Ozone Season Group 3 trading program. It will also significantly reduce NOx allowance allocations beginning in 2023. This proposal has contributed to the rise in allowance prices from approximately \$2,500 last year to \$40,000 per ton this summer. An update with more details on these changes was circulated earlier this year.

On August 19th, EPA took final action to revise deadlines under allowance trading programs for all CSAPR trading programs. This action addresses the issuance of emissions allowances to program participants, effectively compressing the time for transferring allowances in advance of annual compliance deadlines.



#### 2023 AND 2024 GROUP 3 ALLOCATIONS

EPA will complete revised allocations for CSAPR NOx Ozone Season Group 3 Trading Program for the 2023 and 2024 control periods by September 1, 2023.

#### 2025 AND LATER ALLOCATIONS

For all CSAPR trading programs as well as the Texas SO<sub>2</sub> Trading Program, the deadlines for the EPA to record advance allocations of allowances are revised to July 1 of the year immediately before the year of each such control period.



## EHS

### CAMS EHS Policy

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. CAMS recognizes that the long-term sustainability of our business depends upon these commitments and how they are reflected in the conduct of our business. In short, sustained EHS Excellence is a core value of CAMS.

Our Health and Safety philosophy is built on trust, accountability, and the belief that “ALL INCIDENTS CAN BE PREVENTED”. We require individual accountability, from the most junior to senior employee, as well as all contractors working at the facility.

Our Environmental approach is to be a good steward of the natural resources entrusted to our care while providing unparalleled services to our customers. Protecting the environment

is integral to CAMS's planning, design, construction, and operational decisions.

CAMS is committed to excellence in our EHS practices and performance while ensuring compliance with local, state, and federal laws and regulations. To achieve these aims, CAMS:

- Utilizes a management system that monitors, measures, tracks, and drives continuous improvement in EHS performance;
- Takes a proactive approach to address EHS issues;
- Establishes and maintains EHS procedures at all locations;
- Ensures that each employee understands they have the authority and obligation to stop an unsafe or environmentally unsound job or task; and
- Routinely reviews and evaluates EHS programs, procedures, and practices to ensure they are effective and incorporating industry best practices.

It is the expectation of all CAMS employees, contractors, and affiliates to take an active role to ensure all policies, guidelines, and procedures are followed and to deliver the best results in health, safety, and environmental stewardship in the industry.

Please join me in learning and following these policies as we continue our goal of an “Incident Free” workplace. Your involvement, cooperation and personal commitment to safety are essential. Leading the industry in safety and environmental stewardship requires a disciplined and consistent effort. We need you on this team to help us reach our vision.

Sincerely,

Greg Bobrow  
Chief Operating Officer

**CAMS**  
Consolidated Asset Management Services

## SAFETY

### Simplified Checklist for Site Walk-Throughs

By Ben Vodila, V.P. Health & Safety



As CAMS continues to foster and improve its EHS Culture, we are rolling out initiatives that reflect the core principles of our EHS Vision. To focus our efforts and provide better guidance on how to achieve world class results, the CAMS EHS team is implementing a mobile inspection checklist covering regulatory Health and Safety requirements at the facility level. This will help us in developing our EHS leaders and focusing on fundamentals across all of our sites.

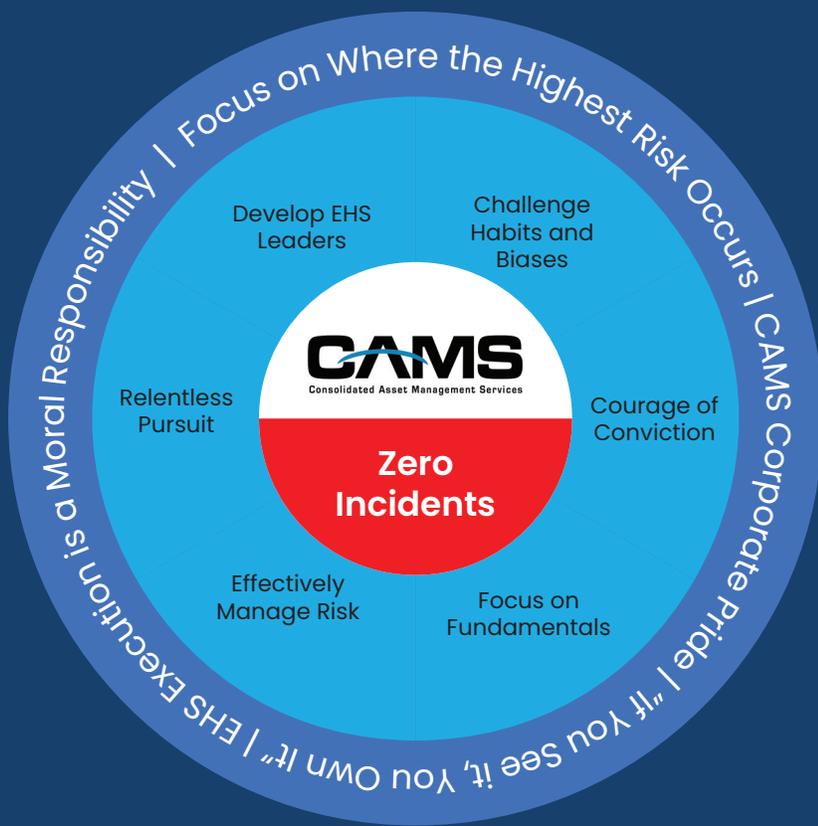
Our new mobile checklist application asks simple yes or no questions – such as for LOTO

“Has each employee working on a machine affixed their own lock?” – and conveniently provides the Department of Labor regulation where that requirement is cited. Upon completion, the app also auto-generates a report with both positive and negative findings. For any negative findings, the report gives general recommendations on how to mitigate the hazard created.

Facilities are beginning to use this app as part of their CAMS required Quarterly Management Facility reviews. While we have been conducting these reviews at our facilities for years, this

report also makes it convenient for sites to identify hazards and immediately close them out. Over time, our annual Corporate Compliance Assessments will focus on higher risk issues as the more minor hazards will be identified and closed out throughout the year.

Frequent use of this app reinforces CAMS expectation that we will comply with all health and safety regulations, and also reminds us to implement some of the more common safety practices that may otherwise be taken for granted. While we all know the importance of



prior to incidents occurring, which is our overall goal.

**PATH FORWARD**

CAMS Health & Safety will proactively measure the use of this tool and the hazards found on our reports as a direct measure of the safe conditions for our employees and contractors. CAMS facilities have started using this tool, and we will be measuring the percentage of facility inspections as a KPI in 2023.

housekeeping and keeping a clean facility, many times we might forget that accumulation of debris creates tripping hazards, and someone will eventually fall and injure themselves, which is easily preventable.

This also gives CAMS a macro view of issues identified at all of our sites combined. This data allows our corporate team to send out focused communications on the current hazards being identified at our sites. Facilities also will be able to measure their compliance performance over time, hopefully mitigating hazards and proactively learning lessons

If you have any questions or concerns about expectations or how to effectively use this model, please contact us at [safety@camstex.com](mailto:safety@camstex.com), or contact Vice President of Health & Safety - Ben Vodila ([bvodila@camstex.com](mailto:bvodila@camstex.com)).

AISLES & WALKWAYS	
<b>Issue Identified</b>	Not all aisles and walkways are kept clean and orderly (1910.22)
<b>Recommendation</b>	Take steps to ensure all places of employment, passageways, store-rooms, service rooms, and walking-working surfaces are kept in a clean, orderly, and sanitary condition [reference 1910.22(a)(1)]. <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.22">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.22</a>
<b>Positive Finding(s)</b>	Aisles/walkways are kept dry (to extent feasible) in wet operations, drainage or dry standing mats are provided (1910.22)
	Aisles/walkways are kept in good repair, free of hazards (1910.22)
	Permanent aisles & passageways are appropriately marked (1910.22)
	There is sufficient aisle width for pedestrians and/or equipment in work areas where mechanical handling equipment is used (1910.22/ Interpretation Letter)
<b>Issue Identified</b>	Not all changes in elevation are adequately marked/delineated to minimize trip hazards (Best Practice)
<b>Recommendation</b>	Consider marking or delineating (i.e. paint yellow, use cross hatching, etc.) to identify areas where elevation changes create a potential trip/fall hazard (Best Practice).
<b>Positive Finding(s)</b>	Good compliance with OSHA Aisleway requirements (1910.22)



## REGULATORY

### CAMS OT Cyber Services

By Kyle Tobias, Senior FERC/NERC CIP Compliance

There was once a time where OT systems were considered inherently safe. Terms like “islanded” “unconnected” and “air-gapped” led to a common thought that these systems were unreachable by outside forces or bad actors. Recent events, from Stuxnet to BlackEnergy to Colonial Pipeline, have proven this sense of invulnerability to be false.

According to a 2015 Ponemon Institute report, the power and utilities sectors are now the most frequently targeted industries for cyber-attacks. Regulatory agencies such as NERC have taken notice and steadily increased their compliance requirements in response. CAMS OT Cyber suite of offerings can assist in maintaining compliance, and better prepare your facility for the regulatory changes over time.

#### NERC COMPLIANCE

CAMS provides the needed training, guidance and auditing needed to ensure your facility is compliant with the NERC family of standards, including NERC CIP. By working with the sites directly, CAMS can identify gaps in the existing OT security programs and facilitate their remediation. Greenfield sites are also supported by developing the OT security program from the ground up with site specific processes and procedures, building compliance into the program from the start. CAMS can represent the customer sites as needed during any NERC audit procedure, facilitating the auditing process.

#### BASELINE & CONFIGURATION CHANGE MONITORING

Any compliance begins with identifying what you have and the current state. This baseline process defines what the current state of the endpoints of the control systems are, but also defines what a good baseline looks like. Over time, patches are applied and other changes occur - this is expected. By monitoring the changes in the configuration of these endpoints CAMS can determine, along with the site, whether



the changes were expected and allowed, and if a new baseline is warranted. This process is required at the NERC CIP medium and high impact levels and is good practice for all sites.

**OT NETWORK MONITORING**

Monitoring the traffic on IT networks has been considered good practice for a long time. Recently, monitoring on the OT network has become common for the same reason. NERC standards CIP-005 and CIP-007 both address various points related to the OT network. Monitoring the OT network traffic itself provides a layer of compliance for the site, in addition to being complementary of other anti-virus and access controls also in place. Monitoring the OT network traffic provides the ability to detect, in real-time, anomalous behavior within the network such as abnormal behavior and zero-day attacks.

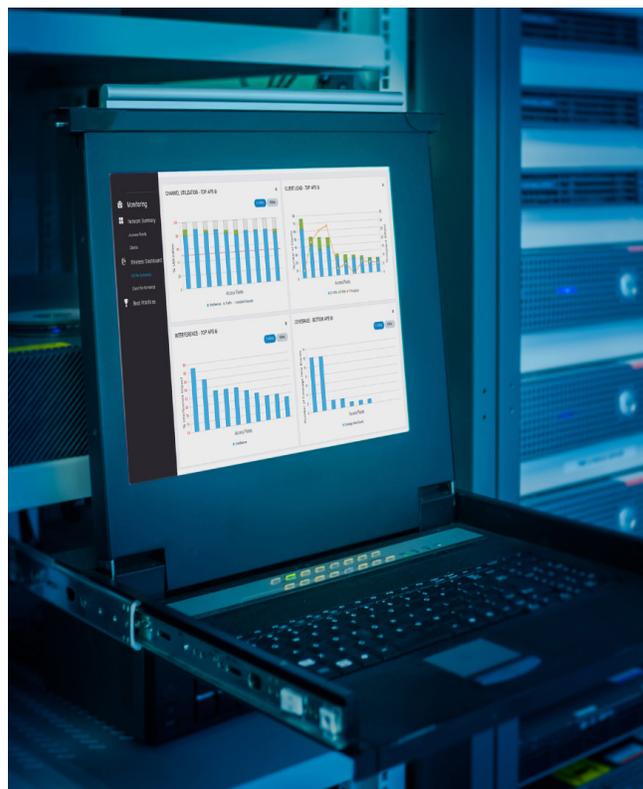
**REMOTE OPERATIONS**

CAMS Remote Operation Center (ROC) can be utilized to remotely operate your plant facility. Remote operations of renewables facilities such as solar, wind

and battery storage facilities is commonplace but we are also starting to see other power generation sites take advantage of the benefits of remote operations. The CAMS ROC can handle plant operations from all generation options. From renewables to combustion, hydro and pumped storage to battery farms.

**COMBINE SERVICES FOR MAXIMUM BENEFIT**

Any one of the above options brings benefits your site. But by bundling them together and utilizing more than one of these services, the benefits become compounded. For instance, remote operations and remote monitoring complement each other perfectly as they address both the operations of the plant, and the security of any connections within the plant, remote or otherwise. Having good baselines that are monitored for changes directly supports your facilities NERC CIP compliance. CAMS OT Cyber suite of services were developed by plant operators, for plant operators. Take advantage of our experience and expertise.



## ESG

### CAMS Environmental Stewardship

#### Linden Station Beneficial Water Reuse



Linden Station is comprised of Linden CT and CC sub-plants. Linden CC consists of two separate 2X1 combined cycle units based on GE 7FA gas turbines, with a combined generating capacity of 1,300 MW. The plant is part of the ArcLight-owned Parkway Generation portfolio, which is operated and managed by CAMS.

Linden CC is located in an area designated by the Aqueduct Water Risk Atlas as a “high water risk” area based on water availability, water quality, and regulatory/reputational risk. However, the plant operational commitments require a large

amount of water. Traditionally, combined cycle plants meet their water requirements through the uptake and discharge of water to the surrounding environment. However, Linden CC wanted to minimize the environmental impact of its operations in this resource-constrained area. They opted to use greywater, a beneficial re-use water (BRUW), as its non-contact cooling water source, thus eliminating the need to utilize surface water, groundwater, or city water for this process. Linden’s use of BRUW for cooling purposes has a positive impact on the community as it helps the local municipal supplier reserve more

water for its residential customers. At the same time, aquatic wildlife is protected since the plant does not use cooling water intake structures and because the BRUW is recycled after use, discharge to Arthur Kill is not necessary.

Linden CC strives to maximize the use of BRUW, ultimately offsetting the use of alternate water sources by as much as 800 million to 1.3 billion gallons per year. The grey water has limited other beneficial uses and would otherwise be discharged back to the environment.

The BRUW is sourced from the Linden-Roselle Sewerage

Authority (LRSA). After the water is processed through LRSA's system it is discharged from their final ultra-violet treatment bed to an outfall area. Linden CC pumps the water across the LRSA property to a gravity-fed sand filter system. There the water is "polished" to remove any additional solids. A small portion of the water is returned to the LRSA influent where it then passes through the LRSA process again. The rest of the "polished" water is forwarded to the plant for use as non-contact cooling water in the cooling towers. After the water is cycled several times in the cooling towers, it is returned to the LRSA for treatment. Linden CC maintains chemistry in this system with the addition of sodium hypochlorite (bleach) as needed to help keep the sand filter station in proper order and to maintain water quality within the cooling towers.



The process is monitored continuously for proper operation from the LRSA side pump station to the return of the discharge at the LRSA's influent. The system and water quality are maintained by both station personnel and support staff specifically qualified to ensure the system is optimally maintained.

The BRUW program at Linden CC is an example of how CAMS sustainably operates and manages its facilities. Our plant management teams proactively seek opportunities to provide reliable energy services while making positive contributions to their communities and minimizing environmental impacts.



## ESG

### Community Service

CAMS Corporate Office and Operating Facilities continue to be active supporters of their communities. Highlights for this quarter include initiatives at Montville, Middletown, and Vandolah, as well as the Houston corporate office.

#### MONTVILLE

The Montville plant is part of the Generation Bridge portfolio owned by ArcLight and operated by CAMS. The Montville facility is situated on the Thames River in Uncasville, Connecticut. It has a generation capacity of 488 MW, consisting of two boilers.

Over a dozen Montville employees participated in the 4th Annual Amber's Rescue Run. The event benefited the Wings of Freedom Animal Rescue, an all-volunteer non-profit entity which is supported 100% by donations and fundraising. Montville raised \$9,200, which will be used to help rescue animals needing medical

treatment or specialized training.

In August, a team of four employees took part in the Montville Education Foundation (MEF) annual "Tee it up for Education" golf tournament. Montville was a Gold Level sponsor, contributing \$1,100 to this charity event. The MEF was founded to promote excellence in education for residents of all ages within the Montville community. MEF provides financial support for projects, programs and activities that promote a lifetime of learning.

#### MIDDLETOWN

The Middletown plant is also part of the Generation Bridge portfolio owned by ArcLight and operated by CAMS. It is located on the western bank of the Connecticut River in Middletown, Connecticut. The plant has a 953 MW generation capacity and consists of three steam electric generating boilers and five combustion turbines.

In September, Middletown was a \$500 Leader Board sponsor of the 36th Annual Hospice Golf Tournament, benefiting the Middlesex Health Hospice Program. This program cares for patients who face life-limiting



illnesses and their families. The program focuses on emotional and spiritual support, as well as management of pain and other symptoms.

Montville also provided a \$1,000 financial donation to the YMCA Camp Ingersoll. The camp provides summer activities for children four to sixteen years old, including team-building exercises, arts and crafts, archery, boating, swimming, challenge courses, nature experiments and exploration opportunities. The donation helps to subsidize the cost for needy families to attend.

Middletown offered financial support to the Amazing Grace Food Pantry through a \$1,000 donation. The Amazing Grace Food Pantry is an organization that relies on the generosity of community members to make financial contributions, donate food items, and volunteer. The food pantry serves breakfast, lunch, and a to-go sandwich to individuals in the community. They also operate a Food Shop at which families can select the specific food items that they need.

Kurt Huizing, Middletown Plant Manager, commented, “The stations employees’ time and financial contributions to the local organizations continue to

yield good will for both Middletown and Montville Power Generating facilities.”

#### **VANDOLAH AND HOUSTON CORPORATE OFFICE**

The CAMS corporate office in Houston, Texas and the Vandolah Power Plant supported back-to-school supply drives in their local areas. Vandolah is a 680 MW, dual fuel peaking plant located in Wauchula, Florida. The facility is operated by CAMS and is owned by Northern Star Generation.

Vandolah employees packed approximately 300 backpacks with school supplies for students from kindergarten through high school. The backpacks were distributed at the community’s annual Wildcat Tailgate event sponsored by Main Street Wauchula.

Throughout August, corporate employees donated supplies such as paper, notebooks, binders, scissors, glue, pens, pencils, and rulers to the 2022 YMCA Greater Houston Operation Backpack drive. This initiative benefits over 20,000 children in Houston.

“CAMS’ participation in these events helps ensure that local students have what they need for a great start to this school year,” said Mona Johnson, CAMS Senior Vice President of Environmental, Health, Safety, and Regulatory. “CAMS employees are actively involved in their communities, and continuously pursue opportunities such as these to make a positive impact.”





## **BUSINESS ETHICS**

### **Confidential Reporting**

CAMS complies with the highest level of governance standards, and we stand by our Code of Ethics and Business Conduct. We believe it is important to allow for suspected violations to our code to be reported anonymously to help us further safeguard our stakeholders' confidence and protect our reputation.

**CAMS' CONFIDENTIAL REPORTING PROVIDES THE ABILITY TO REPORT ETHICAL OR OTHER ISSUES THROUGH A THIRD-PARTY VENDOR, ANSWERFIRST, THAT CAN BE ACCESSED BY CALLING 346-500-6288.**

Confidential reporting through AnswerFirst complements our current reporting practices, as outlined in our Code of Ethics and Business Conduct, which available for download from Fuse at My Company->Documents. Annual Business Ethics training is issued via the KnowBe4 platform.

### **Consolidated Asset Management Services**

#### **Environmental, Health, Safety and Regulatory Division**

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