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|---|--|---|--|---|---------------------------|
| 2700-FM-AQ0023 Rev. 1/2008  |  | <b>INSPECTION REPORT</b>                                      |  | Commonwealth of Pennsylvania<br>Department of Environmental Protection<br>Air Quality Program |                           |
|   |  |   |  |   |                           |
| Date(s) of Inspection:<br><b>1/3/2023</b>   | TV <input type="checkbox"/> PA <input type="checkbox"/><br>SM <input type="checkbox"/> GP <input checked="" type="checkbox"/><br>NM <input type="checkbox"/> MEGA <input type="checkbox"/> | Permit #(s):<br><b>63-01001</b>                               | Expiration Date:<br><b>8/7/2023</b>  | Case #:<br><b>63-01001</b>  | PF ID #:<br><b>805136</b> |
| Company Name:<br><b>ETC Northeast Pipeline LLC</b>  |  | Municipality:<br><b>Smith Twp</b>                             |  | County:<br><b>Washington</b>  |                           |
| Plant Name:<br><b>Revolution Cryo</b>   |  | Physical Location:<br><b>Point Pleasant Rd</b>                |  | Federal ID — Plant Code #:<br><b>26-2863376-3</b>   |                           |
| Responsible Official:<br><b>Stephen Schuman</b>   |  |   | Mailing Address:<br><b>6051 Wallace Rd Ext, Suite 300</b>                              |   |                           |
| Title:<br><b>VP Operations</b>  |  |   | <b>Wexford, PA 15090</b>   |   |                           |
| Phone #(s):<br><b>724-934-0100</b>  |  |   |  |   |                           |
| <b>Mark (X) All Inspection Types That Apply To This Inspection:</b>   |  |   |  |   |                           |
| <input type="checkbox"/> Full Compliance Evaluation (FCE)   | <input type="checkbox"/> Plan Approval Inspection  | <input type="checkbox"/> File Review (FR)                     |  |   |                           |
| <input type="checkbox"/> Operating Permit Inspection (PI)   | <input type="checkbox"/> Initial Permit Inspection (IPI)   | <input checked="" type="checkbox"/> Complaint Inspection (CI) |  |   |                           |
| <input type="checkbox"/> Routine/Partial (RTPT)   | <input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)   | <input type="checkbox"/> Sample Collection (SC)               |  |   |                           |
| <input type="checkbox"/> Minor Source(s) Inspection (RFD)   | <input type="checkbox"/> Stack Test Observation  | <input type="checkbox"/> Multi-Media Inspection (MM)          |  |   |                           |
| Other:  | <input checked="" type="checkbox"/> Announced  |   |  |   |                           |
| Annual Compliance Certification Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A   |  |   | Date Received:   |   |                           |
| AIMS Report Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A   |  |   | Date Received:   |   |                           |
| <b>Mark (X) All Activities That Apply:</b>  |  |   |  |   |                           |
| <input type="checkbox"/> File Review  | <input checked="" type="checkbox"/> Pre-Inspection Briefing  | <input checked="" type="checkbox"/> Exit Interview/Briefing   |  |   |                           |
| <input checked="" type="checkbox"/> Pre-Inspection Observations   | <input checked="" type="checkbox"/> Check For New/Unreported Sources   | <input type="checkbox"/> Sample(s) Collected                  |  |   |                           |
| <input type="checkbox"/> Visible Emissions Observations   | <input type="checkbox"/> Verify Operation of CEMS  | <input type="checkbox"/> Other                                |  |   |                           |
| <b>Comments/Recommendations:</b> Enforcement since last FCE <input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach summary)   |  |   |  |   |                           |
| <p>On January 3, 2023 at approximately 9am, myself (Anna Hensel, AQ District Supervisor), Dan Kline (AQ Environmental Trainee), and Alex Sandy (AQ Engineering Specialist) arrived onsite at ETC Rev Cryo plant for an announced site visit to discuss a fire that occurred on 12/25/2022. We met with the following ETC personnel: Jason Griffin (Plant Manager), Alyssa Najewicz (Sr Specialist Environmental), Brad Fiesler, and Caleb Cameron. This site visit was conducted as part of malfunction report follow-up and in response to 2 complaints received for this event (both under CTS ID# 369027).</p> <p>Though this inspection report is being marked as “in” compliance, PADEP’s investigation into the circumstances of this event remains ongoing. Additional information will be reviewed as it is made available.</p> |  |   |  |   |                           |
| Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report  |  |   | Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No |   |                           |
| Company Representative:<br>Emailed to Alyssa Najewicz 1/3/2023  |  | Title:  | Signature:   | Date:   |                           |
| DEP Representative:<br>Anna Hensel  |  | Title:<br>District Supervisor                                 | Signature:<br>Anna Hensel / AH   | Date/Time:<br><b>1/3/2023</b>   |                           |
| This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.   |  |   |  |   |                           |

# INSPECTION REPORT

## Continued

The fire occurred the morning of 12/25/2022. I received a voicemail from Alyssa Najewicz on 12/25 at 8:51am to report this incident. On 12/27, Alyssa left me another voicemail and spoke with Beth Speicher, AQ Operations Chief. On 12/28/2022, Doug Frisco with ETC provided the following report to PADEP via email:

“Alyssa Najewicz reported an incident at our Revolution Cryo facility on 12/25/22 to both the DEP emergency hotline and via voicemail to SWRO regional staff. This email is the written follow-up report required within 3 business days of an incident under the GP-5 malfunction reporting guidance.

A. Name and location of the facility:

ETC Northeast Pipeline, LLC Revolution Cryo, 76 Rover Lane, Bulger PA, 15019

B. Nature and cause of the malfunction or incident:

A product release occurred due to a valve failure on a line connected to the coalescer vessel on the water wash system. The release ignited causing a fire in the amine system section of the plant and the plant ESD was activated to evacuate the facility through the flare. The site was isolated until the fires were extinguished and remains shut down at this time.

C. Time when the malfunction, incident or breakdown was first observed:

The release was observed at approximately 7:20 AM on 12/25/22.

D. Expected duration of increased emissions

Emissions have ceased as of 4:59 PM on 12/25/22.

E. Estimated rate of emissions

The product that was released/combusted was C2+ vapor. We are working on an estimate of volume released to determine emissions and will send an update when that information is available.

Please let us know if you have any questions about the information above. We will follow up with additional information as it is available.”

While on site, ETC personnel explained that ETC is still investigating the circumstances and causes of this event. At approx. 7:40am on 12/25, Jason received a call from a technician at Rev Cryo that an incident had occurred, there was an active fire on site, the plant had undergone an Emergency Shut Down (ESD) and the local fire department was on its way. Jason stated that ETC manually isolated valves in the vicinity of the fire. Alyssa stated that due to safety considerations, emergency responders allowed the fire to burn rather than make attempts to put it out; however, the progression of the fire was monitored closely during the event. Brad stated that at 4:58pm the flames were extinguished.

The fire occurred around the “water wash” area, which is otherwise known as part of the amine system. Amine systems operate to remove methanol, H<sub>2</sub>S, and CO<sub>2</sub> from the gas stream. Photo #1 below shows the “water wash” area on 1/3/2023. The contact tower from the amine system (pictured below in photo #2) took much of the damage from the fire.

Brad stated that although the cause of the fire is still under investigation, ETC has determined that a leaking valve at the water wash area (1 inch line under 500 lbs pressure) resulted in a vapor cloud of C<sub>2</sub>+ material. The vapor cloud then ignited and the fire spread to surrounding equipment. The ignition source is currently unknown, and there were no known combustion sources in close proximity.

Company -- plant name:  
**ETC Rev Cryo**

Initials of representative interviewed:

Date:

Reviewed By \_\_\_\_\_

# INSPECTION REPORT

## Continued

Another result of this event was a loss of communications systems within the plant. Video footage of the plant's open flare is unavailable due to the lack of communication systems. However, Alyssa stated that there were visible emissions noted from the plant flare during the ESD. A Method 22 visible emissions observation was not conducted during this event due to lack of available personnel during the emergency.

ETC staff are calculating the estimated quantity of gas released. Though the station ESD routed gas within the plant to the plant flare, some quantity of gas was released through the failed valve at the water wash area, therefore a portion of the total emissions from this event were uncontrolled. At the time of this site visit, totals volumes were yet unknown.

Jason stated that the Rev Cryo facility is shutdown until further notice, with no anticipated date to resume operations. Jason and Brad stated that at this time, ETC has been focusing on understanding the scope of damage and thus true repair work has not yet started. Alyssa stated she would keep PADEP informed of any status updates as the facility moves closer to resuming operation.

We inquired about the need for replacement equipment. Though the damage to the water wash area appeared to be extensive, other areas of the plant were not impacted. Jason stated the plant flare was inspected and though they have not yet received final determinations, the flare tips and other parts of the flare appear to be in good working order. The cryo tower, heaters, thermal oxidizer, and other plant equipment were not impacted by the fire. Alex noted that replacement of equipment authorized by the current Air Quality permit may require a new authorization to ensure the latest standards are met. Alyssa stated she would send to Alex (with cc to me) a list of equipment that will need replacement for PADEP's permitting considerations.

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Photos taken by Anna Hensel on 1/3/2023:  
Photo 1 – Water wash area with damaged equipment



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# INSPECTION REPORT

Continued

**Photo 2 – amine system contact tower (had been in place on cement pad in photo #1 where person with gray shirt and brown pants in standing)**



As stated above within this report, though this inspection report is being marked as “in” compliance, PADEP’s investigation into the circumstances of this event remains ongoing. Additional information will be reviewed as it is made available.

**-END OF REPORT-**

Company -- plant name:  
**ETC Rev Cryo**

Initials of representative interviewed:

Date:

Reviewed By \_\_\_\_\_