

Accident Compressor Station & Storage Field Accident, Maryland

Blowdown Notification Plan

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1. Introduction

Pursuant to Maryland Department of the Environment (further referenced as Department) Code of Maryland Regulations (COMAR) 26.11.41 Control of Methane Emissions from the Natural Gas Industry, Texas Eastern Transmission, LP (Company) is required to prepare a blowdown notification plan for the Accident Compressor Station and Storage Field. The rule is effective November 16th, 2020.

A blowdown is considered the release of pressurized natural gas from a station, equipment, or pipelines into the atmosphere conducted with the intent to lower the pressure in a vessel or pipeline. A blowdown does not include natural gas pneumatic emissions, fugitive component emissions, or pressure seal leakage (rod packing). This blowdown notification plan (Plan) has been developed to document TETLP's processes and procedures for notifying the public and Department of natural gas releases in excess of 1,000,000 scf at the compressor station and storage field required by COMAR 26.11.41 .07 B(2). Refer to Table 1 for details regarding specific requirements.

Table 1 - Notification Plan and COMAR Rule Requirements

Requirement	•	Section
COMAR	Notification format to local authorities, MDE,	Notification format
26.11.41.07.B(2)(a)	interested parties	
COMAR	Public outreach plan to inform interested	Outreach Plan
26.11.41. 07.B(2)(b)	parties of blowdown events above 1 MMscf	
COMAR	Responsible personnel for notifications	Responsible
26.11.41. 07.B(2)(c)		Personnel
COMAR	Sitemap with areas for potential blowdown	Sitemap
26.11.41. 07.B(2)(d)	emissions above 1 MMscf	_

This Plan will be revised as needed to reflect changes in stakeholder outreach or notification format. Upon request, the information referenced in this Plan will be made available to the Department. This information is stored electronically, and hardcopies made available upon request.

2. Notification Format

2.1 Department Notification

TETLP will notify the Department's Compliance Engineer assigned to the facilities by email for all planned, unplanned, or emergency blowdown events in excess of 1,000,000 scf of natural gas. TETLP will use the notification templates attached to this plan (Appendix A and B) for these notifications and include contact information for the Department to follow up with if necessary. For planned blowdown events, a notification email will be sent 7 days prior to such event. Upon occurrence of an unplanned or emergency blowdown event TETLP will attempt to notify the Department within 1 hour but no later than 24 hours of occurrence.

2.2 Public Notification

Blowdown notifications to the public and interested parties will be made on the company's website. The website (https://www.enbridge.com/projectsAMD) will maintain information for upcoming blowdown events and prior blowdown events may be removed on a rolling 90-day basis. The website will contain a link to email a company representative for more information.

The website format will allow for timely updates and revisions as information becomes available. At least 7 days prior to a planned blowdown event, TETLP will post a blowdown event notification on its website, including the anticipated activity date. TETLP's North Central Region Environmental Advisor (Region Advisor) or designee provides the estimated release dates to update the public website at least 7 days prior to the planned event. Upon occurrence of an unplanned or emergency blowdown event, TETLP will post a blowdown notification on its website within 2 business days of the occurrence.

2.3 Resident and Business Notification

An initial mailing will go out to all residents and businesses within 0.5 mile of potential blowdown event locations at the compressor station or storage field informing them of the website. Standard practice is to notify residents and businesses within 660 ft. of a planned natural gas blowdown event. Residents and businesses are notified via mail, phone, or in person.

2.4 Local Authority Notification

The Garrett County non-emergency number (301-334-1929) will be called for planned, unplanned, and emergency blowdown events at the Accident Compressor Station or Storage Field.

3. Outreach Plan

Consistent with standard industry practices, TETLP will publish a legal notice once per calendar year in the Garrett County Republican newspaper to notify interested parties of the availability of blowdown event information on the company's website (https://www.enbridge.com/projectsAMD). Refer to section 2.3 for additional outreach plans.

4. Implementation Plan

TETLP will notify the Department Compliance Engineer of blowdown events upon acceptance of this notification plan. Within 90 days of approval, TETLP will post in the local newspaper and send a mailer to residents and businesses within 0.5 mile of a potential blowdown event site. The website will go live within 90 days of approval to support the public notification process.

5. Responsible Personnel

5.1 Planned Releases

The project team enters construction work into a database for Air Projects' review. Air Projects shall notify the Region Advisor if the project includes a potential blowdown event.

ROW notifies residents and businesses within 660 ft of the release.

The Region Advisor or designee with the support of the Monitoring and Reporting Environmental Advisor will request an update to the website and notify the Department Compliance Engineer by email using the notification template in Appendix A. The Region Advisor is the point of contact for questions or follow up required with the Department on planned, unplanned, and emergency events.

5.2 Unplanned and Emergency Releases

Notifications to the Department Compliance Engineer by email using the template in Appendix B will be made by TETLP's Station Supervisor or designee with the support of the Region Advisor. The notification to the Department will include the Region Advisor and Air Monitoring and Reporting Advisor in cc. The Region Advisor or designee will be responsible for requesting a blowdown notification be posted on the company's website within 2 business days of the event.

5.3 Local Authority Notifications

Notifications to the local authorities will be made by TETLP's Station Supervisor or designee.

6.1 Accident Compressor Station

The Accident Compressor Station is shown in Figure 1. Natural gas releases in excess of 1,000,000 scf at the Compressor Station are directed through the source control stack. The blue arrow identifies the location of the stack.



Figure 1. Accident Compressor Station

6.2 Accident Underground Storage Field

The Accident Storage Field is shown in Figure 2. The pink dots represent the 84 wells. The red lines represent the natural gas piping that connects the 84 wells. A blowdown event in excess of 1,000,000 scf could occur at a well head or along the piping.

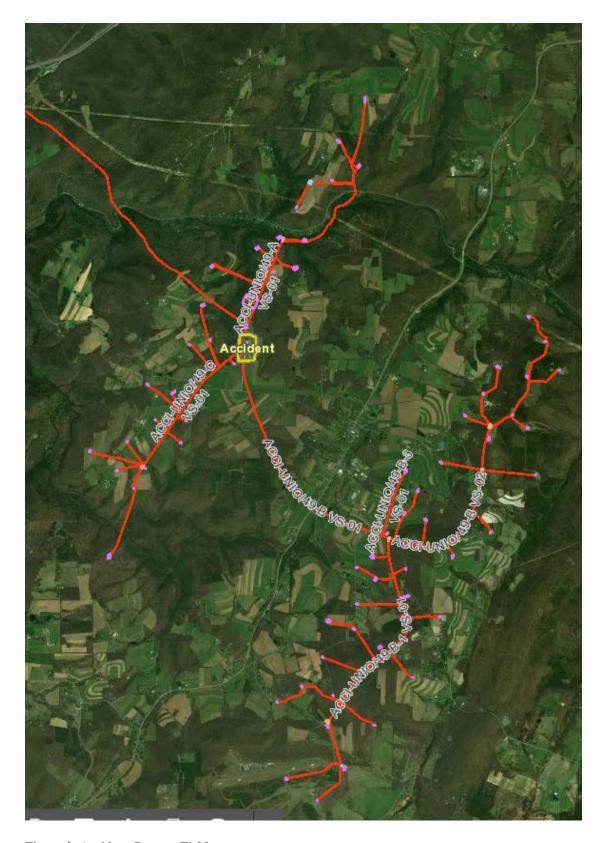


Figure 2. Accident Storage Field

Appendix A – Accident Planned Blowdown Notification Template			



[Month DD, YYYY]

Attn: Industrial Compliance Division
Maryland Department of the Environment, Air Quality Compliance Program
1800 Washington Boulevard, 7th Floor
Baltimore, MD 21230

RE: Notification of Planned Blowdown Event

Texas Eastern Transmission, LP

Accident Compressor Station and Storage Field

Mitchell Greger,

Texas Eastern Transmission, LP (TETLP) owns and operates a natural gas compressor station and underground storage facility in Accident Maryland. Subject to COMAR 26.11.41. TETLP is required to notify the Maryland Department of Environment (MDE) 7 days prior to a planned blowdown event expected to exceed 1,000,000 standard cubic feet at these facilities

The estimated total volume of natural gas anticipated for release during this blowdown event on [Month] [DD] is expected to exceed the 1,000,000 scf threshold. As such TETLP is submitting this notification and has posted a notification to our website at https://www.enbridge.com/projectsAMD.

If TETLP revises its timeline for this scheduled blowdown event, TETLP will promptly inform MDE and other stakeholders affected by this blowdown event.

If you should have any questions, please contact Brad Wynnemer] by phone at (952) 983-1035) or email Bradley. Wynnemer@enbridge.com

Sincerely,

Brad Wynnemer Environment, U.S. Operations

Cc:

Angela Beeson, Enbridge Public: Enbridge website

Appendix B – Accident Unplanned Blowdown Notification Template				



Month DD, YYYY

Attn: Industrial Compliance Division
Maryland Department of the Environment, Air Quality Compliance Program
1800 Washington Boulevard, 7th Floor
Baltimore, MD 21230

RE: Notification of Emergency/Unplanned Blowdown Event Texas Eastern Transmission, LP

Accident Compressor Station and Storage Field

Mitchell Greger,

Texas Eastern Transmission, LP (TETLP) owns and operates a natural gas compressor station and underground storage facility in Accident Maryland, referred to as the Accident Facility. The facility is subject to COMAR 26.11.41.effective November 16th, 2020,

This is to inform you that an [emergency/unplanned] blowdown event occurred at the [Accident Compressor Station/Storage Facility] on [INSERT DATE] at approximately [INSERT EASTERN TIME]. In accordance with COMAR 26.11.41 .07 B.(5), TETLP is required to notify MDE within 1 hour of any unplanned or emergency blowdown events at the Accident Facility that exceed 1,000,000 standard cubic feet (scf) of natural gas.

We are working to better understand the situation. At this time TETLP has determined the blowdown may have been associated with [provide any known information or associated equipment\location].

If you should have any questions, please contact Brad Wynnemer by phone at (952) 983-1035 or email Bradley. Wynnemer @ enbridge.com

Cc:

Mitchell Greger, MDE- mitchell.greger@maryland.gov Public: Enbridge Website Brad Wynnemer, Enbridge Angela Beeson, Enbridge

Revision History

Revision Number	Revision Date	Initials	Summary of changes
1.0	2/10/2021	AB	Initial Plan