



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of Texas Eastern/Delmont Station
Inspection Date(s): October 31, 2023
Regulatory Program(s): MACT/NSPS/SIP/TV

Company Name: Texas Eastern Trans LP
Facility Name: Texas Eastern/Delmont Compressor Station
Facility Location: 160 Adele Lane
Greensburg, PA 15601

Latitude: 40.3841 **Longitude:** -79.5479
County/Parish: Westmoreland County

AFS/ICIS-Air Number: PA000275643
Permit Number: 65-00839
NAICS Code: 486210 **SIC:** 4922
Unique Project #: 3E23CA45A

Facility Representatives:	Point of Contact
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Eric Cunningham, Environmental Advisor	☒
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EPA Inspectors:
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State/Local Inspectors:
Tom Norris, Air Quality District Supervisor
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EPA Lead Inspector

Signature

Dean Deluca

Date

1060 Chapline Street, Suite 303
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Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Texas Eastern Trans LP Delmont Station (Delmont or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on October 17, 2023, via email. On October 27, 2023, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Vanessa Crayne, prior to the inspection (see Attachment 1). EPA did not conduct a records review onsite and Delmont agreed to submit the requested documents at a later date.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 160 Adele Lane, Greensburg, PA 15601. Texas Eastern Delmont is a compressor facility which operates engines and/or turbines to increase the pressure of the natural gas in the pipeline. The Facility operates under a NAICS code of 486210 (Pipeline Transportation of Natural Gas) and a SIC codes of 4922 (Natural Gas Transmission). Texas Eastern Trans LP is owned by Enbridge Inc.

The Facility received a Title V Operating Permit (65-00839) from PADEP with an effective date of May 23, 2022, and a Plan Approval (65-00839C) with an effective date of June 15, 2023. The Facility received CAA Notices of Violation (NOVs) from PADEP on February 6, 2020, and April 19, 2021.

Texas Eastern Delmont is classified as major source of emissions for Nitrogen Oxides (NO_x), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC) and is a minor source of Hazardous Air Pollutants and other criteria pollutants. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 60 Subpart GG – Standards of Performance for Stationary Gas Turbines
- 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines
- 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

B. Inspection Opening Conference

At 2:25 PM on October 31, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Delmont was represented by Zachary Voytek, Pipeline Technician, and Eric Cunningham, Environmental Advisor. Also, Adrienne Rihn, Air Quality Specialist, and Tom Norris, Air Quality District Supervisor, of the Pennsylvania Department of Environmental Protection (PADEP) were present. EPA inspectors, Dean DeLuca and Parmatma Adhikari, presented their credentials and explained the purpose of the visit was to conduct an inspection to determine compliance with the CAA, Delmont's PADEP permit, and any applicable air regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Delmont did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

The Delmont compressor station has been operating at the Greensburg, PA location since 1954. The Facility is currently operated twenty-four hours a day and seven days a week and has eleven employees assigned to the location. Facility representatives stated the Facility might change personnel hours to a single Monday-Friday shift next year in lieu of having personnel on-site twenty-four hours a day and seven days a week. The Facility area is approximately 42.6 acres, and it operates under Texas Eastern Trans LP. Texas Eastern Trans LP was owned by Spectra until 2015 when the current owner, Enbridge, purchased Texas Eastern Trans LP. Enbridge had about 14,000 employees before Enbridge's recent purchase of three branches of Dominion in August 2023. At the time of the inspection, the additional number of employees was not known. Enbridge is a Canadian company which has a United States headquarters in Houston, Texas. Enbridge is publicly traded on the Toronto Stock Exchange and New York Stock Exchange as ENB.

The Facility has a Solar Mars turbine which was installed in 2001 and a Solar Titan turbine which was installed in 2014. There are six 1,100 HP reciprocating engines which were installed in the 1950's. At the time of the inspection, the Solar Titan turbine and a 32,000 HP electric turbine, listed as a miscellaneous source in the PADEP permit, were in operation while the six reciprocating engines and Solar Mars turbine were not in operation. The natural gas throughput at the time was 2.4 billion cubic feet per day and the Facility stated it normally operates between two and five billion cubic feet per day. At the time of the opening conference, the pressure in the discharge line was 1,050 psi.

There was also a discussion concerning prior compliance issues at the Facility. The Solar Mars turbine failed a stack test for NO_x in April 2020 and a stack test for Particulate Matter (PM) in July 2023. Following both failed stack tests, the Facility retested for the applicable pollutants and were compliant upon retesting. Both the Solar Mars and Solar Titan turbines had periods, at least

during 2020, 2021, and 2022, where the units exceeded the permitted shutdown duration of ten minutes. The June 15, 2023, PADEP Plan Approval (65-00839C) has conditions intended to correct this issue. The Facility and PADEP also entered into Consent Agreement on October 13, 2020, which was resolved in August 2023, so it is no longer applicable. The Facility does not have any continuous emissions monitoring systems (CEMS) to monitor emissions from the engines or turbines.

Facility representatives stated that Delmont's pigging operation includes three pig launchers and two receivers on-site with the third receiver located at an unpermitted valve site on an adjacent hillside. The Facility was unsure if the pigging emissions from the receiver located off-site are included in Delmont's annual emissions inventory. Pigs are used to remove excess liquids from the natural gas pipeline that can restrict gas flow.

The opening conference concluded at 3:18 PM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 3:22 PM by Zachary Voytek and Eric Cunningham of Delmont and Tom Norris and Adrienne Rihn of PADEP were also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2).

The inspection team first entered the Solar Compressor building which housed the Solar Titan and electric turbines and both turbines were in operation. The nameplate for Solar Titan showed that it was manufactured in 2013 and had seventy-four starts with 16,850 hours of operation. The Solar Titan turbine is equipped with Solar's SoLoNO_x technology to reduce NO_x and CO emissions which turns on automatically when the throughput is below a certain threshold which the Facility representatives did not know at the time of the walkthrough. Each turbine had a filter/separator which was located outside of the building.

The inspection team then observed the two emergency engines. The first generator was the Caterpillar model 3412 with 2,087 operating hours. The second emergency generator observed had different hour readings; a reading of 31,135 hours on the engine and a digital screen showing 10,439.6 hours. Facility representatives stated the emergency engines are only used for emergencies, maintenance, and testing.

The inspection team then observed the reciprocator compressor building. The six Ingersoll-Rand engines were located on the eastern side of the building. Due to their age, the nameplates were unable to be found on many of the engines. As noted below, EPA requested the Facility to provide images of the nameplates and month of manufacture for the six reciprocating engines. Facility representatives stated these six engines are almost exclusively operated for maintenance

and testing. Also, there were four engines permanently removed from service located on the western side of this building.

The inspection team then went to observe the pigging area. On the way to the pigging area, the inspection team passed the emergency shutdown discharge pipes. Facility representatives stated these discharge pipes are operated twice a year to ensure safe operation in the event of an emergency. The pipeline liquids (accumulator) tank was also located in this area. When needed, this tank is unloaded to trucks. There were three natural gas lines located close together in the pigging area (lines 19, 27 (decommissioned), and 28) and line 29 located approximately two hundred feet to the west of the other three lines. Facility representatives stated this pigging area frequently receives pigs and they originate from the Uniontown compressor station. The pigging process takes an average of about seven to twelve hours, but diagnostic pigging operations can take longer. Facility representatives stated they have a third-party monitoring company conduct LDAR (leak detection and repair) monitoring quarterly. Enbridge also has a work crew accompany the third-party monitoring company to make a first attempt at repair shortly after any leak is observed. The leak rate from the LDAR monitoring is used to estimate fugitive emissions.

The Solar Mars turbine building was the final engine and/or turbine observed by the inspection team. This turbine is also equipped with Solar's SoLoNO_x technology to reduce NO_x and CO emissions which turns on automatically when the throughput is below a certain threshold. At the time of the inspection, this unit was not in operation. Lastly, the inspection observed the small welding shop in which MIG (metal inert gas) welding is done on occasion.

The walkthrough concluded at 4:31 PM.

IV. Records Review

EPA did not conduct a review of records onsite. In addition to the records requested in the EPA's October 27, 2023, email to Vanessa Crayne, EPA requested the following records while onsite:

1. The monthly pigging loading and receiving frequency for each line from January 2019 to October 2023.
2. A map or diagram showing the pig launchers and pig receivers, including those within ¼ mile from the facility boundaries.
3. The most recent LDAR monitoring report.
4. The nameplate images for the Solar Mars and Solar Titan turbines.
5. The month of manufacture and installation for the six reciprocating engines and two emergency generators.

V. Closing Conference

After the records review, EPA inspectors, Zachary Voytek, Eric Cunningham, and Tom Norris had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions.

The inspection concluded at 4:51 PM.

VI. List of Attachments

Attachment 1: Email correspondence to Vanessa Crayne of records requested to review during inspection

** Photos were taken during the inspection and EPA provided all taken photos to the Facility. The Facility has claimed all photos to be confidential business information. Because of this, the photos are not included in this inspection report at this time.*

Deluca, Dean

From: Deluca, Dean
Sent: Friday, October 27, 2023 12:38 PM
To: Vanessa.crayne@enbridge.com
Cc: Adhikari, Parmatma
Subject: EPA Inspection of Texas Eastern Delmont

Vanessa,

As mentioned in our phone conversation, EPA is going to conduct a Clean Air Act inspection of Texas Eastern Delmont on October 31, 2023. EPA will have two inspectors onsite to conduct the inspection, which will include an opening conference, site walkthrough (including photos and potentially FLIR monitoring), and record review/closing conference. PADEP also plans to have one or two personnel onsite for the inspection. EPA should arrive at the facility on the afternoon of 10/31/23 at 1:30PM. Please see the below list of records EPA would like Texas Eastern Delmont to provide. I will include a separate email with a link for Texas Eastern Delmont to upload documents using EPA's goanywhere file sharing site. As I mentioned on the phone, I would like to have a hardcopy of the facility plot plan available at the time of the inspection. You indicated that the required PPE for the facility includes hard hat, safety glasses, steel toed shoes, hearing protection, and FR clothing. Let me know if you have any questions about the inspection or record request.

1. Provide a plot plan of the facility available in hardcopy for the inspection opening conference which identifies each processing unit, control device, storage vessels, etc. for the facility.
2. Provide the potential to emit for VOC, NOx, CO, PM, SO2, total HAPs, and formaldehyde.
3. Provide the two most recent annual emissions inventory statements as well as any calculations and emissions factors used to calculate emissions for each pollutant and the origin of each emission factor.
4. Provide the date the facility commenced operations and the date(s) of any ownership change, if applicable.
5. Provide the address of any other locations owned and/or operated by Texas Eastern or any parent company.
6. Provide the net worth of Texas Eastern Trans LP as well as that of any parent company.
7. Provide the details on any process, equipment, or material changes which increased or decreased emissions since the last permit issuance in May 2022, if any.
8. For each fire pump, generator, or engine located onsite, provide the monthly hours of operation and natural gas consumption from January 2019-present as well as usage reasons for the emergency generators.
9. Provide the catalyst records required to be maintained by the PADEP permit #65-00839, Section E, group SG01, III. #005 from January 2019, July 2021, and March 2023.
10. Provide the two most recent 40 CFR Part 63 Subpart ZZZZ semiannual compliance reports.

Thanks, Dean

Dean DeLuca
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