



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/Holbrook Station
Inspection Date(s): October 31, 2023
Regulatory Program(s): MACT/NSPS/SIP/TV
Company Name: Texas Eastern Trans LP
Facility Name: Texas Eastern/Holbrook Station
Facility Location: 258 Bristoria Road
Wind Ridge, PA 15380
Latitude: 39.890028 **Longitude:** -80.45256
County/Parish: Greene County
AFS/ICIS-Air Number: PA000253404
Permit Number: 30-00077
NAICS Code: 486210 **SIC:** 4922
Unique Project #: 3E23CA46A

Facility Representatives:	Point of Contact
Vanessa Crayne, Environmental Supervisor	☐
Phone: 412-944-6017 Email: Vanessa.crayne@enbridge.com	
Eric Cunningham, Environmental Advisor	☒
Phone: 740-213-8993 Email: Eric.cunningham@enbridge.com	

EPA Inspectors:
Dean DeLuca, Physical Scientist
Phone: 304-234-0264 Email: DeLuca.Dean@epa.gov
Parmatma Adhikari, Environmental Engineer
Phone: 215-814-2161 Email: Adhikari.Parmatma@epa.gov

State/Local Inspectors:
Dana Donovan, Environmental Trainee
Phone: 412-919-7040 Email: danadonova@pa.gov
Kristin Goddard, District Supervisor
Phone: 412-442-4039 Email: krgoddard@pa.gov

EPA Lead Inspector

Signature

Dean Deluca

Date

1060 Chapline Street, Suite 303
Wheeling, WV 26003-2995

Supervisor

Signature

Kristen Hall

Date

Table of Contents

I. Introduction.....	3
A. Summary of the Facility	3
B. Inspection Opening Conference.....	4
II. Site Activity/Process Description.....	4
III. Observations.....	5
IV. Records Review	6
V. Closing Conference	6
VI. List of Attachments.....	7

I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at the Texas Eastern Trans LP Holbrook Station (Holbrook 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 Holbrook 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 258 Bristoria Road, Wind Ridge, PA 15380. Texas Eastern Holbrook is a compressor facility which operates engines and/or turbines primarily 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 (30-00077) from PADEP which was issued on October 4, 2023. The Facility received CAA Notices of Violation (NOVs) from PADEP on February 19, 2021, and August 19, 2022. The Facility is also regulated as an active large quantity generator (LQG) under the Resource Conservation and Recovery Act (RCRA) regulations.

Holbrook is classified as a major source for Nitrogen Oxides (NO_x), Carbon Monoxide (CO), and Volatile Organic Compounds (VOCs), and a minor source for 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 60 Subpart JJJJ – Standards of Performance for Stationary SI internal Combustion Engines
- 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

B. Inspection Opening Conference

At 8:57 AM on October 31, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Holbrook was represented by Vanessa Crayne, Environmental Supervisor, and Eric Cunningham, Environmental Advisor. Also, Dana Donovan, Environmental Trainee, and Kristin Goddard, 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, Holbrook'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, Holbrook did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

The Holbrook compressor station has been operating at the Wind Ridge, PA location since the mid 1950's. The Facility is currently operated twenty-four hours a day and seven days a week and has nine employees assigned to the location. The site is 44.66 acres and has slightly less than a half a mile to the nearest residence. The Facility operates under Texas Eastern Trans LP. Texas Eastern Trans LP was owned by Spectra until 2017 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, 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 recently decommissioned approximately sixteen engines as part of a facility upgrade. At the time of the inspection, there was a lot of construction occurring in the lower portion of the property. Holbrook stated the Solar Mars Turbine #2 was operating and the Solar Mars Turbine #1 was not in operation. At that time, natural gas was flowing south at approximately 1.3 billion cubic feet per day with only the Solar Mars Turbine #2 operating. The Facility stated the parts washer was decommissioned earlier in 2023 and that diesel fuel is not used at the Facility. The Facility does not use water or steam injection for 40 CFR Part 60 Subpart KKKK but instead conducts performance tests to determine NO_x compliance for Turbines #2 and #3. PADEP requires testing annually which is more stringent than the biannual testing required by 40 CFR Part 60 Subpart KKKK so the Facility conducts annual testing. The Facility does not have any continuous emissions monitoring systems (CEMS) to monitor emissions from the engines or turbines.

Although the Facility technically operates twenty-four hours a day and seven days a week it is possible for it to go months without operating if the natural gas demand is low enough where the compressors aren't needed. The Facility representatives mentioned there was a period of multiple years where the Facility did not operate, but they restarted to full operations approximately in 2020. This Facility's pigging operations have the capability to both receive pigs and load pigs,

but the facility stated it does not receive any pigs at this location. Pigs are used to remove excess liquids from the pipeline that can restrict gas flow.

The opening conference concluded at 10:04 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:11 AM by Vanessa Crayne and Eric Cunningham of Holbrook, and Dana Donovan and Kristin Goddard of PADEP were also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2). It was mostly cloudy with a temperature around 40°F during the walkthrough.

The inspection team first entered the compressor building B. This building was being used for storage at the time of the inspection. There were about sixteen engines located in the building and all the engines were permanently shut down. Next, the inspection team went to the pigging areas. There were three pigging lines located in this area. The Facility representatives stated they calculate emissions from the pigging operations using the amount of gas which is lost during the operation and the gas chromatography results from the nearest recorded location in the natural gas pipeline to get the natural gas composition. Facility representatives stated they have a third-party monitoring company conduct LDAR (leak detection and repair) monitoring annually which will become quarterly monitoring once the new engines are operating which is projected to be in the first half of 2024. 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 inspection team did not observe any open hatches on the top of the pipeline liquids storage tank. The inspection team observed a 500,000 BTU Hanover flame arrestor burner for the Solar Mars turbine #2. The Facility representatives stated there was a similar burner for the other Solar turbine and they were unpermitted due to their small size. Solar turbine #1 and #2 also each had a filter separator and glycol cooler. When the inspection team arrived at the turbines, the Solar turbine #1 was also operating, meaning that both #1 and #2 were operating at the time of the walkthrough. The #2 turbine was operating at 91.5% capacity.

The first observed emergency generator was a 440 HP (328 kW) Waukesha, this engine had a manufacture date of February 2010 and showed 828.3 total hours of operation. The second observed emergency generator was a 300kW Stamford with 2,380.0 total hours of operation and the manufacture year could not be found. As part of the inspection follow-up, the Facility stated the engine was installed in 1995.

The walkthrough concluded at 11:33 AM.

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 frequency for each line from January 2019 to October 2023.
2. Emission calculations showing how the emissions are calculated for the startups and shutdowns for Turbines #1, #2, and #3.
3. The monthly startup and shutdown occurrences from January 2019 to October 2023.
4. The most recent LDAR monitoring report.
5. The most recent integrity test inspection of the pipeline liquids tank.
6. The nameplate images for the turbines and emergency generators.
7. The month of manufacture and installation for the Stamford emergency generator.

V. Closing Conference

Following the walkthrough, EPA inspectors, Vanessa Crayne, Eric Cunningham, Dana Donovan and Kristin Goddard 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 sixty 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 11:49 AM.

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 Holbrook

Vanessa,

As mentioned in our phone conversation, EPA is going to conduct a Clean Air Act inspection of Texas Eastern Holbrook 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 two personnel onsite for the inspection. EPA should arrive at the facility on the morning of 10/31/23 at 8:30AM. Please see the below list of records EPA would like Texas Eastern Holbrook to provide. I will include a separate email with a link for Texas Eastern Holbrook 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, NO_x, CO, PM, SO₂, total HAPs, CO₂ 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. As part of this, please ensure the emissions from periods of startup, shutdown, and low ambient temperature events are included.
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 all 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 daily records required by PADEP Permit 30-00077 Section C. III. #013 for October 2023.
10. Provide the records required by PADEP Permit 30-00077 Section C. IV. #015 from January 2019-present.
11. For source 122 (area fugitives), provide documentation required by PADEP Permit 30-00077 Section D. IV. #002 from January 2019-present.
12. For source 130 (gas release events), provide documentation required by PADEP Permit 30-00077 Section D. I. #001 and #002 from January 2019-present unless this information is submitted as part of an above request.

Thanks, Dean

Dean DeLuca
Physical Scientist, Air & RCRA Branch
Enforcement & Compliance Assurance Division (ECAD)
U.S. Environmental Protection Agency, Region III
DeLuca.Dean@epa.gov; (304) 234-0264