

PSE's Response to WUTC Staff Data  
Request No. 032

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION****Docket UG-230393  
Puget Sound Energy  
Tacoma LNG Tracker****WUTC STAFF DATA REQUEST NO. 032:**

REQUESTED BY: Crystal Oliver

**Re: June 8, 2023 PSCAA NOVs**

In response to Public Counsel's Data Request No. 46, PSE responded that "On June 8, 2023, PSE received Notices of Violations ("NOVs") for the Tacoma LNG facility that are unrelated to historical production. As of September 7, 2023, PSCAA has not assessed fines for these events."

- a. What did PSE receive the June 8th, 2023 NOVs for?
- b. Provide a copy each of these NOVs.
- c. Provide a copy of any responses or communications sent from or on behalf of PSE to PSCAA regarding these NOVs.
- d. Has PSE received any other NOVs from PSCAA? If so please provide a copy of each and any response or communication sent from or on behalf of PSE regarding them.
- e. Has PSE received any other notices, violations, or fines from any other party? If so, please provide a copy of any responses or communications sent from or on behalf of PSE to PSCAA regarding these.

**Response:**

- a. Attached as Attachment A to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 032, please find the General Notices of Violation ("NOVs"). The conditions or events that led to the issuance of the NOVs are set forth in Attachment A. The issues underlying these NOVs were reported by PSE to the Puget Sound Clean Air Agency ("PSCAA") and reflect the optimization of the facility during its initial phase of operation and are not indicative of ongoing long-term operations.
- b. Please see Attachment A to this data request response.
- c. Attached as Attachment B to PSE's Response to WUTC Staff Data Request No. 032, please find a letter from PSE to PSCAA dated June 21, 2023 in response to the NOVs.

- d. No.
- e. Attached as Attachment C to PSE's Response to WUTC Staff Data Request No. 032, please find a copy of a Written Warning received from PSCAA for not filing a report within 15 days for the November 6, 2022 violation. The November 6, 2022 violation is included in Attachment A on pages 33 through 35. The report should have been filed on November 21, 2022. The report was late filed on December 6, 2022.

**ATTACHMENTS A-C  
to PSE's Response to  
WUTC Staff Data Request No. 032**



PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000804

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000804
<b>Violation Date:</b> 4/5/2022 and 4/6/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> P.O. Box 97034, BEL10W		
<b>City, State:</b> Bellevue, WA	<b>Zip:</b> 98009-9734	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

### Alleged Reason(s) for Violation:

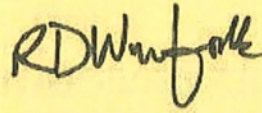
On 4/5/2022 and 4/6/2022, Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere. The source reported the following bypass events in their April deviation report, Offsite Report #30022-15:

*"On April 5, 2022, the flare manufacturer was conducting maintenance on the enclosed ground flare air flow controls. During that time, the pilot lights were operating and assist gas was being combusted in the flare to simulate normal operation of the large warm burner. Because the plant liquefaction equipment was shut down, only trace amounts of waste gas (e.g., gas chromatograph speed loops) were being combusted. There were 2 nonconsecutive minutes on this day where the enclosed ground flare experienced a loss of flame due to inconsistent air flow as a result of the maintenance activities. When that occurred process safety measures were automatically activated, and the gases being directed to the flare were instead directed to the diversion vent. The first bypass event occurred from 14:07 to 14:08 (1 Minute) and the second bypass event occurred from 15:59 to 16:00 (1 Minute)."*

*"On April 6, 2022, the flare manufacturer was continuing its maintenance activities under the same circumstances as the prior day (i.e., the plant was not liquefying). There were 26 minutes reflecting three nonconsecutive periods where the enclosed ground flare experienced a loss of flame due to inconsistent air flow as a result of the maintenance activities. As on the prior day, process safety measures were automatically activated, and waste gases were directed to the diversion vent. The first bypass event occurred from 13:58 -13:59 (1 Minute); the second bypass event from 14:50 to 15:01 (12 Minutes); the third bypass event occurred from 15:57 – 16:09 (13 Minutes)."*

### **CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.



Issued By: \_\_\_\_\_

Date: 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042  
RickW@pscleanair.gov

Received By: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Signature*

*Print Name*

*Date*

*(Signing is not an admission of guilt)*

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

### **Do not ignore this Notice of Violation!**

- Your violations may result in a civil penalty (monetary fine).
- Receiving a NOV does not necessarily mean you will receive a civil penalty, nor does correcting the violation ensure that you will not receive a civil penalty.
- Penalties are based on the information in our files, the corrective action you take, your written response to this NOV, and any other information you present to the Agency.
- If your violations are significant, the Agency may commence a court action against you and/or your business.
- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

### **WITHIN TEN DAYS OF RECEIPT, YOU MUST RESPOND TO THIS NOV IN WRITING**

**Please include:**

- Your name and/or business name
- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

Puget Sound Clean Air Agency  
1904 3rd Avenue, Suite 105  
Seattle, WA 98101  
Fax (206)343-7522  
Inspection@psccleanair.gov

**Need technical assistance or more time to respond?**

Please contact the Inspector who issued this NOV (contact information on the front page).

**Want a copy of the inspection report or other records from our files?**

Please contact our Records staff: (206) 689-4040 or [RecordsRequest@psccleanair.gov](mailto:RecordsRequest@psccleanair.gov)

**Request copies of records via our web site:**

<http://www.pscleanair.gov/RecordsRequest>

**In addition to the required written response, you may also request a meeting with the Agency to:**

- Discuss the circumstances of the violation
- Ask any questions you have
- Present any information the Agency may not have considered when issuing the NOV

### **YOU ALSO HAVE THE OPTION TO FILE AN APPEAL**

**You may file an appeal of the Corrective Action Order in this NOV.** The Pollution Control Hearings Board (PCHB) hears appeals of orders and penalties issued by the Agency. The PCHB is independent and is not part of the Agency. The PCHB's function is to provide you a full and complete administrative hearing, as promptly as possible, followed by a fair and impartial written decision based on the facts and law.

**Appeals must be sent to the PCHB and a copy of your appeal must be sent to the Agency within 30 days of your receipt of this NOV.** For more information about how to file an appeal, what information must be included in an appeal, and what to expect from the appeal process, please contact the PCHB:

Pollution Control Hearings Board  
PO Box 40903  
Olympia, WA 98504-0903  
(360) 664-9160  
Fax (360) 586-2253  
[eluho@eluho.wa.gov](mailto:eluho@eluho.wa.gov)  
<http://www.eluho.wa.gov/>

Complete information about appeal requirements is contained in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and in the PCHB regulations (Chapter 371-08 WAC). RCW and WAC are available online.

REPORT ON THE PROGRESS OF THE WORK

FOR THE YEAR 1911

The work of the Bureau during the year 1911 has been characterized by a steady and continuous progress in all the various branches of the service. The most important of these branches are the following: (1) the collection and classification of statistics; (2) the publication of reports and bulletins; (3) the maintenance of the Bureau's files; (4) the improvement of the Bureau's methods of work; and (5) the cooperation of the Bureau with other departments of the Government.

WITHIN THE DATE OF REPORT YOU MUST RESPOND TO THE WORKING

The following are the principal items of work which have been completed during the year 1911: (1) The collection and classification of statistics; (2) the publication of reports and bulletins; (3) the maintenance of the Bureau's files; (4) the improvement of the Bureau's methods of work; and (5) the cooperation of the Bureau with other departments of the Government.

YOU ALSO HAVE THE OPTION TO FILE IN ANOTHER

The following are the principal items of work which have been completed during the year 1911: (1) The collection and classification of statistics; (2) the publication of reports and bulletins; (3) the maintenance of the Bureau's files; (4) the improvement of the Bureau's methods of work; and (5) the cooperation of the Bureau with other departments of the Government.





PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000805

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

Case #:	Registration #: 30022	Violation #: 3-A000805
Violation Date: 3/29/2022 and 3/30/2022	Time:	Certified Mail #: 7021 1970 0000 8941 9648
Violation Location (Address): 1001 E Alexander Ave.		
City: Tacoma	Zip: 98421	County: Pierce
Responsible Person (Name, Title): Ruth Juris, Environmental Scientist		
Facility Name (If applicable): Puget Sound Energy		
Mailing Address: P.O. Box 97034, BEL10W		
City, State: Bellevue, WA	Zip: 98009-9734	Phone: (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

### Alleged Reason(s) for Violation:

On 3/29/2022 and 3/30/2022, Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere. The source reported the following bypass events in their March deviation report, Offsite Report #30022-14:

*"On March 29, 2022 there were 12 minutes where an unexpected upset occurred in pre-treatment. The upset activated the process safety control measures where process gases were routed through the diversion vent rather than being routed to the flare. This event started at 09:56 and ended at 10:07 when the process was stabilized and returned to normal operations."*

*"On March 29, 2022 there were 20 minutes where plant experienced a loss of flame due to inconsistent air flows into the flare. With a loss of flame, process safety measures were automatically activated, and waste gases were directed to the diversion vent. This event started at 11:04 and ended at 11:23, when air flow was stabilized, and the flare was returned to service."*

*"On March 29, 2022 and March 30, 2022 there were short, unexpected upsets. These upsets occurred on March 29, 2022 from 20:22 – 20:26 for a duration of 5 minutes; 23:15 for a duration of 1 minute; on March 30, 2022 from 00:30 – 00:42, for a duration of 13 minutes; and 01:19 – 01:22 for a duration of 4 minutes, respectively. During these events, process safety measures were automatically activated, and waste gases were directed to the diversion vent until the flare was returned to service."*

### **CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

Issued By: \_\_\_\_\_

Date: \_\_\_\_\_

5/12/2023

Rick Woodfork, Inspector, (206) 689-4042  
RickW@pscleanair.gov

Received By: \_\_\_\_\_

*Signature*

*Print Name*

*Date*

*(Signing is not an admission of guilt)*

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

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- If your violations are significant, the Agency may commence a court action against you and/or your business.
- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

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**Please include:**

- Your name and/or business name
- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

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MEMORANDUM FOR THE DIRECTOR, FBI

Re: [Illegible]

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YOUR COPY OF THIS REPORT IS BEING FORWARDED TO THE FOLLOWING:

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000806

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

Case #:	Registration #:	30022	Violation #:	3-A000806
Violation Date: 12/13/2021	Time:		Certified Mail #:	7021 1970 0000 8941 9648
Violation Location (Address): 1001 E Alexander Ave.				
City: Tacoma	Zip: 98421	County: Pierce		
Responsible Person (Name, Title): Ruth Juris, Environmental Scientist				
Facility Name (If applicable): Puget Sound Energy				
Mailing Address: P.O. Box 97034, BEL10W				
City, State: Bellevue, WA	Zip: 98009-9734	Phone: (509) 773-7919		

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386 Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

### Alleged Reason(s) for Violation:

On 12/13/2021, Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere. The source reported the following bypass event in their December deviation report, Offsite Report #30022-4:

*"The enclosed ground flare operated during the month of December as part of the commissioning process. On December 13, 2021, there were 6 minutes where, as the result of a warm stream flame failure, process gases associated with commissioning of the liquefier were routed through the diversion vent rather than being routed to the flare. This event started at 16:37 and ended at 16:42 when the flare was successfully reignited."*

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

Issued By: \_\_\_\_\_

Date: 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042

RickW@psc Clean Air.gov

Received By: \_\_\_\_\_

Signature

Print Name

Date

(Signing is not an admission of guilt)

**IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS****Do not ignore this Notice of Violation!**

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- Your name and/or business name
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- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000807

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000807
<b>Violation Date:</b> 2/2/2022, 2/3/2022, 2/4/2022, and 2/23/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> P.O. Box 97034, BEL10W		
<b>City, State:</b> Bellevue, WA	<b>Zip:</b> 98009-9734	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 19** There shall be no visible emissions from the enclosed ground flare, except for periods not to exceed 5 min in any 2 consecutive hours, as determined by EPA Method 22 in Appendix A in 40 CFR Part 60. The observation period shall be 2 hours and shall be used according to Method 22.

### Alleged Reason(s) for Violation:

On 2/3/2022, 2/4/2022, and 2/23/2022, Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere. In addition, on 2/2/2022, they caused or allowed a visible emission from the enclosed ground flare exceeding 5 minutes within a 2-hour period and failed to conduct an EPA Method 22 observation. The source reported the following deviation events in their February deviation report, Offsite Report #30022-12:

*"Starting on February 2, 2022, PSE believes that visible emissions occurred from the flare as the plant was shifting from holding to liquefaction. At approximately 22:28 on February 2, 2022, the flare shifted from the low-fire burner to the high-fire burner as designed. LFG (the flare manufacturer) was adjusting combustion air settings on the low-fire burner, and the inlet air settings were inadvertently not returned to their normal positions. As a result, after the burner transition early in the morning of February 3rd, 2022, the high-fire burner had reduced inlet air and the flame length was extended. This was identified through the numerous plant systems and by approximately 03:16 that morning operations were returned to normal. Although a Method 22 was not performed and the combination of night-time and fog made any determination as to opacity difficult, PSE believes that visible emissions were likely from this event."*

*"On February 3, 2022 at 19:18 the plant started to have an upset associated with the liquefaction system that resulted in the generation of excess waste gas. These waste gases were fully contained and routed to the flare where they were combusted in the warm burner. During the time that these waste gases were combusted, the large warm burner operated outside its normal maximum heat input range; routing these gases to the flare was consistent with the requirements in conditions 10 and 11 of the air permit."*

"On February 4, 2022 there were 4 minutes where an unexpected upset occurred in pre-treatment following the startup of liquefaction on February 3, 2022. The upset activated safety control measures where process gases were routed through the diversion vent rather than being routed to the flare. This event started at 04:26 and ended at 04:30."

"On February 4, 2022 there were 2 minutes where process gases were routed through the diversion vent rather than being routed to the flare. This event started at 16:32, when safety control measures routed the process gases to the diversion vent, and ended at 16:34."

"On February 23, 2022 there were 12 minutes where process gases were routed through the diversion vent rather than being routed to the flare as the result of a flare flameout. This event started at 03:52, when safety control measures routed the process gases to the diversion vent, and ended at 04:20 when the flare was successfully reignited."

**CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.



Issued By: \_\_\_\_\_

Date: 5/12/2023 \_\_\_\_\_

Rick Woodfork, Inspector, (206) 689-4042  
RickW@pscleanair.gov

Received By: \_\_\_\_\_

Signature

Print Name

Date

(Signing is not an admission of guilt)



## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

### **Do not ignore this Notice of Violation!**

- Your violations may result in a civil penalty (monetary fine).
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- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

### **WITHIN TEN DAYS OF RECEIPT, YOU MUST RESPOND TO THIS NOV IN WRITING**

**Please include:**

- Your name and/or business name
- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

Puget Sound Clean Air Agency  
1904 3rd Avenue, Suite 105  
Seattle, WA 98101  
Fax (206)343-7522  
Inspection@psccleanair.gov

**Need technical assistance or more time to respond?**

Please contact the Inspector who issued this NOV (contact information on the front page).

**Want a copy of the inspection report or other records from our files?**

Please contact our Records staff: (206) 689-4040 or RecordsRequest@psccleanair.gov

**Request copies of records via our web site:**

<http://www.pscleanair.gov/RecordsRequest>

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- Ask any questions you have
- Present any information the Agency may not have considered when issuing the NOV

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Pollution Control Hearings Board  
PO Box 40903  
Olympia, WA 98504-0903  
(360) 664-9160  
Fax (360) 586-2253  
eluh@eluh@eluh.wa.gov  
<http://www.eluh.wa.gov/>

Complete information about appeal requirements is contained in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and in the PCHB regulations (Chapter 371-08 WAC). RCW and WAC are available online.





PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000808

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000808
<b>Violation Date:</b> 6/14/2022 and 6/15/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> P.O. Box 97034, BEL10W		
<b>City, State:</b> Bellevue, WA	<b>Zip:</b> 98009-9734	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 21** Failure to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test.

### Alleged Reason(s) for Violation:

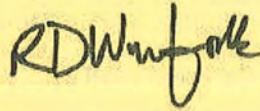
On 6/14/2022, and 6/15/2022, Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere. In addition, on 6/14/2022, the source failed to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test. The source reported the following deviation events in their June deviation report, Offsite Report #30022-19:

*"On June 14, 2022, while the facility was in holding mode (i.e., not producing LNG), the enclosed ground flare warm low fire burner experienced three, 2-minute diversion events, for a total of six minutes, due to the flare pilot flame monitoring system inaccurately reporting the loss of flame in the pilot. Believing that there was a loss of flame, process safety measures were automatically activated, and waste gases being routed to the flare were directed to the diversion vent. The first bypass event occurred from 10:38 -10:39 (2 Minutes); the second bypass event from 10:46 – 10:47 (2 Minutes); and the third bypass event occurred from 10:54 – 10:55 (2 Minutes). In response to each event, the flare was placed into shutdown mode and exhaust gases within the process systems were contained until the flare was restarted. These unplanned bypass events contributed to one, three hour average temperature value of 1028° F for the three hour period ending with the 10:00 hour. This is below the minimum temperature of 1048° F established by the most recent performance test."*

*"On June 15, 2022, while the facility was in holding mode (i.e., not producing LNG), the enclosed ground flare warm low fire burner experienced one, 1-minute diversion event due to the flare pilot flame monitoring system inaccurately reporting the loss of flame in the pilot. Believing that there was a loss of flame, process safety measures were automatically activated, and waste gases being routed to the flare were directed to the diversion vent. A bypass event occurred at 9:06 (1 Minute)."*

**CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.



**Issued By:** \_\_\_\_\_  
Rick Woodfork, Inspector, (206) 689-4042  
RickW@pscleanair.gov

**Date:** \_\_\_\_\_ 5/12/2023

**Received By:** \_\_\_\_\_  
*Signature* *Print Name* *Date*  
(Signing is not an admission of guilt)

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

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- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

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- Present any information the Agency may not have considered when issuing the NOV

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[elaho@elaho.wa.gov](mailto:elaho@elaho.wa.gov)  
<http://www.elaho.wa.gov/>

Complete information about appeal requirements is contained in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and in the PCHB regulations (Chapter 371-08 WAC). RCW and WAC are available online.

THE ORIGIN OF THE REPORT AND THE DATE

DO NOT SIGN THIS SECTION OF THE REPORT

1. The information in this report is based on the information provided by the person who has provided the information. It is not intended to be a statement of fact, but rather a statement of the information provided.

WHEN THE DATE IS REPORTED YOU MUST INDICATE TO WHAT DAY IN WRITING

DATE	REPORTED BY	DATE	REPORTED BY
1/1/75	...	1/1/75	...
1/2/75	...	1/2/75	...
1/3/75	...	1/3/75	...
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1/6/75	...	1/6/75	...
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1/29/75	...	1/29/75	...
1/30/75	...	1/30/75	...
1/31/75	...	1/31/75	...

YOU ALSO HAVE THE OPTION TO SIGN A STATEMENT

The person who has provided the information in this report has the option to sign a statement certifying that the information provided is true and correct to the best of their knowledge and belief.

STATEMENT OF THE REPORTER  
I, \_\_\_\_\_, hereby certify that the information provided in this report is true and correct to the best of my knowledge and belief.

Signature of Reporter: \_\_\_\_\_  
Date: \_\_\_\_\_



PUGET SOUND

Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000809

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000809
<b>Violation Date:</b> 7/1/2022, 7/6/2022, 7/14/2022, 7/21/2022, 7/22/2022 and 7/26/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> P.O. Box 97034, BEL10W		
<b>City, State:</b> Bellevue, WA	<b>Zip:</b> 98009-9734	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 21** Failure to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere and failed to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test. The source reported the following deviation events in their July deviation report, Offsite Report #30022-22:

*"On July 1, 2022, while the facility was in holding mode (i.e., not producing LNG), the enclosed ground flare went into an unplanned shutdown and experienced a bypass event due to the proper activation of process safety measures. The unplanned shutdown occurred when the plant was conducting routine preventative maintenance checks of the Fire and Gas Safety System. The shutdown occurred because the trip was not properly inhibited prior to initiating the test. As a result, the flare went into shutdown mode, and the exhaust gas was routed to the bypass stack. Once the plant identified the cause of the unplanned shutdown, the unit was safely restarted and returned to full operation. Waste gases being routed to the flare were directed to the bypass stack from 14:56 – 15:12 (17 Minutes). The flare also experienced four, rolling three-hour average temperature values below the minimum temperature of 1048° F established by the most recent performance test for operation in holding mode..."*

*"On July 6, 2022 while the facility was in holding mode (i.e., not producing LNG), the enclosed ground flare went into an unplanned shutdown and experienced two bypass events, due to the proper activation of process safety measures. The unplanned shutdown occurred during maintenance and tuning of the flare. Waste gases being routed to the flare were directed to the bypass stack from 12:03 – 12:05 (3 Minutes) and at 12:17 (1 Minute)."*

*"On July 14, 2022, the facility experienced one, three-hour average temperature value below the minimum temperature of 1048° F established for holding mode operations by the most recent*

performance test..."

"On July 21, 2022, while the facility was liquefying, the controls system notified the operators of a low temperature condition on the warm side high-fire combustion temperature thermocouple. The operators took action to investigate the alarm. The troubleshooting identified the need of an update to the control system software, which was performed. The alarm condition was addressed at 14:23. Prior to the update being completed, there were four, three-hour average temperature values slightly below the minimum temperature of 1341° F established for liquefying mode operations by the most recent performance test."

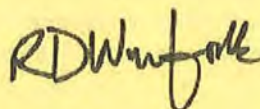
"On July 22, 2022, while the facility was liquefying, the enclosed ground flare went into an unplanned shutdown and experienced a bypass event due to the proper activation of process safety measures. The unplanned shutdown occurred when the BTU analyzer was undergoing calibration for the warm side of the flare and went into an alarm condition which shut down the flare. The plant was moved to holding mode while operators began troubleshooting the alarm. Troubleshooting identified that there was a problem with the igniter connection that would require visual inspection inside the flare to identify the issue. In order to go inside the flare, the feed streams to the flare must be isolated for personal safety and subsequently, no waste gases are routed to flare or bypass stack. During the inspection, it was identified that an electrical short was limiting the restart of the flare due to the failsafe condition locking out the igniter. The operators made the necessary repairs to address the short, and the unit was then safely restarted and returned to full operation. As a result of the 3 unplanned shutdown, waste gases being routed to the flare were directed to the bypass stack from 13:27 – 16:01 (155 Minutes)."

"On July 26, while the facility was liquefying, the enclosed ground flare experienced four, intermittent bypass events due to the proper activation of process safety measures when a fault indication arose on the cold side low-fire pilot temperature thermocouple. The plant had no indication the pilot was not lit, and the burner was confirmed to still be in operation. As a result of the fault indication, exhaust from the cold side burner (which consists of nitrogen and a small amount of assist gas) was routed to the bypass stack resulting in intermittent bypass events occurring from 04:29 – 04:33 (5 Minutes), 06:37 – 06:39 (3 Minutes), 07:40 – 07:42 (3 Minutes) and 07:50 – 07:51 (2 Minutes) respectively. No waste gases from the liquefaction processes (i.e., warm side burners) were routed to the bypass stack."

"On July 30, while the facility was liquefying, the enclosed ground flare experienced three, intermittent bypass events due to the proper activation of process safety measures when a fault indication arose on the cold side low-fire pilot temperature thermocouple. The plant had no indication the pilot was not lit, and confirmed the burner was still in operation, however, troubleshooting indicated there was an issue with the wiring to the temperature element causing the diversions. As a result of the fault indication, exhaust from the cold side burner (which consists of nitrogen and a small amount of assist gas) was routed to the bypass stack resulting in intermittent bypass events occurring from 06:38 – 06:45 (8 Minutes), 06:57 – 06:58 (2 Minutes) and 07:09 – 07:17 (9 Minutes) respectively."

**CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.



Issued By: \_\_\_\_\_

Date: 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042

RickW@pscleanair.gov



Received By: \_\_\_\_\_  
*Signature* *Print Name* *Date*  
*(Signing is not an admission of guilt)*

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- Present any information the Agency may not have considered when issuing the NOV

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Olympia, WA 98504-0903  
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Fax (360) 586-2253  
elaho@elaho.wa.gov  
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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000826

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000826
<b>Violation Date:</b> 8/1/2022, 8/5/2022, 8/7/2022, 8/11/2022, 8/19/2022, 8/22/2022, 8/25/2022, 8/27/2022, 8/28/2022, and 8/31/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 21** Failure to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere and failed to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test. The source reported the following deviation events in their August deviation report, Offsite Report #30022-26:

*"On August 5, 2022, the enclosed ground flare experienced a control logic issue with the air/fuel ratio controller while liquefying. This resulted in the burner not maintaining a minimum 1341°F minimum temperature for four 3-hour rolling averaging periods. The plant modified the control parameter to increase the limiting range and the issue was resolved. The 3-hour average temperatures ranged from a low of 1337°F to a high of 1340°F."*

*"On August 27, 2022, as the liquefaction system was starting up after maintenance, the enclosed ground flare was brought up to temperature slowly. The lowest temperature during this period was 1170°F for the 3-hour period ending with 02:00 on August 27th as the startup of liquefaction began. The last period of low temperature, the 3-hour average period ending with 12:00 on August 28th, was 1323°F."*

*"During the month of August, as the facility was in holding, the enclosed ground flare experienced two (2) 3-hour average temperature values below the minimum temperature of 1048°F established for holding mode operations. The temperature during the 3-hour period ending with 11:00 on August 11th was 1032°F and the 3-hour period ending with 18:00 on August 31 was 1045°F."*

"During the month of August, the enclosed ground flare experienced bypass events related to the proper activation of process safety measures. The bypass events during liquefying occurred when a fault indication noted a low fire pilot temperature causing exhaust gas to be routed to the bypass stack. The plant is troubleshooting these events. The bypass events during holding were associated with maintenance work. Bypasses occurred on the following dates/times":

Date	Time	Plant Status	Aggregate Duration (minutes)
01-Aug-22	04:17 to 04:19 05:24 to 05:25	Liquefying	5
07-Aug-22	04:28	Liquefying	1
19-Aug-22	14:31 to 14:32	Liquefying	2
22-Aug-22	12:00 to 12:02 13:38 13:48 15:21 to 15:39	Holding	24
25-Aug-22	06:55	Holding	1
28-Aug-22	05:35 to 05:40 08:26 to 08:28	Liquefying	9

**CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

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**Issued By:** \_\_\_\_\_  
 Rick Woodfork, Inspector, (206) 689-4042  
 RickW@pscleanair.gov

**Date:** \_\_\_\_\_ 5/12/2023

**Received By:** \_\_\_\_\_  
 Signature \_\_\_\_\_ Print Name \_\_\_\_\_ Date \_\_\_\_\_  
 (Signing is not an admission of guilt)

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- NOV number (upper right hand corner of the NOV)
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**Need technical assistance or more time to respond?**

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**Request copies of records via our web site:**

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**In addition to the required written response, you may also request a meeting with the Agency to:**

- Discuss the circumstances of the violation
- Ask any questions you have
- Present any information the Agency may not have considered when issuing the NOV

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**You may file an appeal of the Corrective Action Order in this NOV.** The Pollution Control Hearings Board (PCHB) hears appeals of orders and penalties issued by the Agency. The PCHB is independent and is not part of the Agency. The PCHB's function is to provide you a full and complete administrative hearing, as promptly as possible, followed by a fair and impartial written decision based on the facts and law.

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Pollution Control Hearings Board  
PO Box 40903  
Olympia, WA 98504-0903  
(360) 664-9160  
Fax (360) 586-2253  
eluh@eluh.wa.gov  
<http://www.eluh.wa.gov/>

Complete information about appeal requirements is contained in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and in the PCHB regulations (Chapter 371-08 WAC). RCW and WAC are available online.

RECEIPT FOR PAYMENT OF WITHIN TEN (10) DAYS

This receipt is valid only if signed by the recipient of the funds.

- 1. The recipient of the funds shall sign this receipt and return it to the sender of the funds within ten (10) days of the date of the receipt.
- 2. If the recipient of the funds does not sign this receipt and return it to the sender of the funds within ten (10) days of the date of the receipt, the sender of the funds shall be deemed to have made a gift of the funds to the recipient.
- 3. This receipt shall be valid only if signed by the recipient of the funds.

WITHIN TEN DAYS OF RECEIPT YOU MUST RETURN TO THE DONOR IN WRITING

1. If you are the recipient of the funds, you must return this receipt to the donor of the funds within ten (10) days of the date of the receipt. If you do not return this receipt to the donor of the funds within ten (10) days of the date of the receipt, the donor of the funds shall be deemed to have made a gift of the funds to you.

2. If you are the sender of the funds, you must retain this receipt until you have received the funds from the recipient. If you do not retain this receipt until you have received the funds from the recipient, you shall be deemed to have made a gift of the funds to the recipient.

3. This receipt shall be valid only if signed by the recipient of the funds.

YOU MAY HAVE A QUESTION TO ASK IN WRITING

If you have a question about this receipt, you may write to the donor of the funds at the address listed below. The donor of the funds will respond to your question as soon as possible.

Donor of the funds: [Name]

Address: [Address]

City: [City]

State: [State]

Zip: [Zip]

Phone: [Phone]

Fax: [Fax]

E-mail: [E-mail]

This receipt is valid only if signed by the recipient of the funds. If you are the recipient of the funds, you must sign this receipt and return it to the sender of the funds within ten (10) days of the date of the receipt. If you do not sign this receipt and return it to the sender of the funds within ten (10) days of the date of the receipt, the sender of the funds shall be deemed to have made a gift of the funds to you.

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This receipt shall be valid only if signed by the recipient of the funds.



PUGET SOUND

Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000827

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

Case #:	Registration #: 30022	Violation #: 3-A000827
Violation Date: 9/29/2022	Time:	Certified Mail #: 7021 1970 0000 8941 9648
Violation Location (Address): 1001 E Alexander Ave.		
City: Tacoma	Zip: 98421	County: Pierce
Responsible Person (Name, Title): Ruth Juris, Environmental Scientist		
Facility Name (If applicable): Puget Sound Energy		
Mailing Address: 1001 E Alexander Ave.		
City, State: Tacoma, WA	Zip: 98421	Phone: (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere. The source reported the following deviation event in their September deviation report, Offsite Report #30022-29:

*"On September 29, 2022, while the facility was liquefying, the enclosed ground flare vent experienced one bypass event due to the proper activation of process safety measures. The bypass event occurred when a fault indication noted a low fire pilot temperature activating the bypass, where exhaust gas was routed to the bypass stack. The pilot was verified to be in service and the fault indication was reset. Waste gases being routed to the flare were directed to the bypass stack from 12:48 – 12:50 (3 Minutes)."*

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

Issued By: \_\_\_\_\_

Rick Woodfork, Inspector, (206) 689-4042  
RickW@psccleanair.gov

Date: \_\_\_\_\_

5/12/2023

Received By: \_\_\_\_\_

Signature

Print Name

Date

*(Signing is not an admission of guilt)*

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

### **Do not ignore this Notice of Violation!**

- Your violations may result in a civil penalty (monetary fine).
- Receiving a NOV does not necessarily mean you will receive a civil penalty, nor does correcting the violation ensure that you will not receive a civil penalty.
- Penalties are based on the information in our files, the corrective action you take, your written response to this NOV, and any other information you present to the Agency.
- If your violations are significant, the Agency may commence a court action against you and/or your business.
- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

### **WITHIN TEN DAYS OF RECEIPT, YOU MUST RESPOND TO THIS NOV IN WRITING**

**Please include:**

- Your name and/or business name
- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

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Inspection@pscleanair.gov

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000828

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000828
<b>Violation Date:</b> 10/1/2022, 10/2/2022, 10/18/2022, 10/23/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 21** Failure to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere and failed to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test. The source reported the following deviation events in their October deviation report, Offsite Report #30022-31:

*"During the month of October, the enclosed ground flare vent experienced four bypass events due to the proper activation of process safety measures, which resulted in exhaust gas being routed to the bypass stack. These events, their dates, times, duration and cause are listed below:*

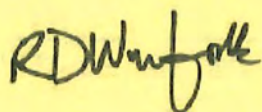
- *October 1, 2022, from 12:00 AM – 12:14 AM, for 15 minutes, due to a BTU Analyzer Malfunction.*
- *October 2, 2022, from 8:38 AM – 8:43 AM, for 6 minutes in duration, due to Cold Side Pilot being extinguished due to high airflow rate in the pilot zone, the plant relit the pilot.*
- *On October 18, 2022, from 11:18 AM – 11:19 AM, for 2 minutes in duration, due to Cold Side Pilot being extinguished due to high airflow rate in the pilot zone, the plant relit the pilot.*
- *On October 18, 2022, from 1:02 PM to 1:04 PM, for 3 minutes in duration, due to inlet gas compressor trip due to loss of signal to the temperature controller."*

*"On October 23, 2022, the enclosed ground flare experienced a high diffuser temperature alarm while liquefying. In response, the combustion temperature was decreased so that the diffuser temperature returned to its normal range. This resulted in the burner not maintaining a minimum 1341°F minimum temperature for three, 3-hour rolling averaging periods. The 3-hour average temperatures ranged from a low of 1324°F to a high of 1338°F."*

### **CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have

taken to correct this violation and achieve compliance with Agency regulations.



**Issued By:** \_\_\_\_\_

**Date:** 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042  
RickW@pscleanair.gov

**Received By:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Signature*

*Print Name*

*Date*

*(Signing is not an admission of guilt)*

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

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- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

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- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000829

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

Case #:	Registration #: 30022	Violation #: 3-A000829
Violation Date: 11/6/2022, 11/19/2022	Time:	Certified Mail #: 7021 1970 0000 8941 9648
Violation Location (Address): 1001 E Alexander Ave.		
City: Tacoma	Zip: 98421	County: Pierce
Responsible Person (Name, Title): Ruth Juris, Environmental Scientist		
Facility Name (If applicable): Puget Sound Energy		
Mailing Address: 1001 E Alexander Ave.		
City, State: Tacoma, WA	Zip: 98421	Phone: (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 21** Failure to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere and failed to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test. The source reported the following deviation events in their November deviation report, Offsite Report #30022-35:

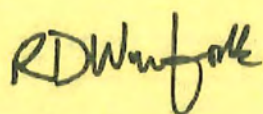
*"On November 6 at 3:00 AM, the 3-hour rolling average combustion temperature for the high fire burner dropped below the 1341°F minimum for one 3-hour rolling averaging period, with a temperature of 1334°F."*

*"On November 6, 2022 PSE identified that the pipeline directional flow would likely reverse direction (i.e., move from south to north at the Fredrickson Gate Station) on November 7, 2022. As a result, at approximately 4:00 PM on November 6, 2022, notice was transmitted to the facility staff alerting them to the impending event and directing them to cease liquefaction. The plant immediately began the process of shutting down liquefaction and shifting into holding mode. As a result, operation shifted from the high fire burner to the low fire burner. Starting with the 3-hour rolling average ending at 6:00 PM and ending with the 3-hour rolling average ending on November 7 at 1:00 AM, the low fire burner was operating but did not maintain the 1048°F minimum 3-hour rolling average temperature. The average temperature for this period was 918°F."*

*"On November 19, 2022, from 4:15 AM – 4:19 AM, for 5 minutes, exhaust gases were diverted to the bypass stack due to the Cold Side Pilot being extinguished as the result of high airflow rate in the pilot zone."*

### **CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.



**Issued By:** \_\_\_\_\_

**Date:** 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042  
RickW@pscleanair.gov

**Received By:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Signature*

*Print Name*

*Date*

*(Signing is not an admission of guilt)*

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

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- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

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**Please include:**

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- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

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Fax (206)343-7522  
Inspection@pscleanair.gov

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000830

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000830
<b>Violation Date:</b> 12/29/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**Regulation I 12.03(b)** Failure to recover valid hourly monitoring data for at least 95% of the hours that the equipment (required to be monitored) was operated during each calendar month.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to recover valid hourly monitoring data for at least 95% of the hours that the equipment (required to be monitored) was operated during each calendar month. The source reported the following in their November deviation report, Offsite Report #30022-36:

- "The stack flowmeter achieved 94.2% of valid hours of monitoring data."

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

**Issued By:**  **Date:** 5/12/2023  
Rick Woodfork, Inspector, (206) 689-4042  
RickW@psccleanair.gov

**Received By:** \_\_\_\_\_  
*Signature* *Print Name* *Date*  
(Signing is not an admission of guilt)

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

### **Do not ignore this Notice of Violation!**

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[eluho@eluho.wa.gov](mailto:eluho@eluho.wa.gov)  
<http://www.eluho.wa.gov/>

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000837

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000837
<b>Violation Date:</b> 3/2/2023	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**Regulation I 12.03(b)** Failure to recover valid hourly monitoring data for at least 95% of the hours that the equipment (required to be monitored) was operated during each calendar month.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to recover valid hourly monitoring data for at least 95% of the hours that the equipment (required to be monitored) was operated during each calendar month. The source reported the following in their January deviation report, Offsite Report #30022-44:

- *"The cold SO2 analyzer achieved 94% of valid hours of monitoring data and so did not meet the 95% minimum data availability requirement for the month."*

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

**Issued By:** \_\_\_\_\_

**Date:** 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042

RickW@psccleanair.gov

**Received By:** \_\_\_\_\_

Signature

Print Name

Date

(Signing is not an admission of guilt)

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

### **Do not ignore this Notice of Violation!**

- Your violations may result in a civil penalty (monetary fine).
- Receiving a NOV does not necessarily mean you will receive a civil penalty, nor does correcting the violation ensure that you will not receive a civil penalty.
- Penalties are based on the information in our files, the corrective action you take, your written response to this NOV, and any other information you present to the Agency.
- If your violations are significant, the Agency may commence a court action against you and/or your business.
- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

#### **WITHIN TEN DAYS OF RECEIPT, YOU MUST RESPOND TO THIS NOV IN WRITING**

**Please include:**

- Your name and/or business name
- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

Puget Sound Clean Air Agency  
 1904 3rd Avenue, Suite 105  
 Seattle, WA 98101  
 Fax (206)343-7522  
[Inspection@pscleanair.gov](mailto:Inspection@pscleanair.gov)

**Need technical assistance or more time to respond?**

Please contact the Inspector who issued this NOV (contact information on the front page).

**Want a copy of the inspection report or other records from our files?**

Please contact our Records staff: (206) 689-4040 or [RecordsRequest@pscleanair.gov](mailto:RecordsRequest@pscleanair.gov)

**Request copies of records via our web site:**

<http://www.pscleanair.gov/RecordsRequest>

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- Discuss the circumstances of the violation
- Ask any questions you have
- Present any information the Agency may not have considered when issuing the NOV

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 Olympia, WA 98504-0903  
 (360) 664-9160  
 Fax (360) 586-2253  
[eluho@eluho.wa.gov](mailto:eluho@eluho.wa.gov)  
<http://www.eluho.wa.gov/>

Complete information about appeal requirements is contained in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and in the PCHB regulations (Chapter 371-08 WAC). RCW and WAC are available online.



PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000838

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000838
<b>Violation Date:</b> 3/30/2023	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**Regulation I 12.03(b)** Failure to recover valid hourly monitoring data for at least 95% of the hours that the equipment (required to be monitored) was operated during each calendar month.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to recover valid hourly monitoring data for at least 95% of the hours that the equipment (required to be monitored) was operated during each calendar month. The source reported the following in their February deviation report, Offsite Report #30022-45:

- "The warm SO<sub>2</sub> analyzer achieved 91% of valid hours of monitoring data and did not meet the 95% minimum data availability requirement for the month."

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

Issued By: \_\_\_\_\_

Date: \_\_\_\_\_

5/12/2023

Rick Woodfork, Inspector, (206) 689-4042

RickW@psc Clean Air.gov

Received By: \_\_\_\_\_

Signature

Print Name

Date

(Signing is not an admission of guilt)

**IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS****Do not ignore this Notice of Violation!**

- Your violations may result in a civil penalty (monetary fine).
- Receiving a NOV does not necessarily mean you will receive a civil penalty, nor does correcting the violation ensure that you will not receive a civil penalty.
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- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

**WITHIN TEN DAYS OF RECEIPT, YOU MUST RESPOND TO THIS NOV IN WRITING****Please include:**

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- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

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1904 3rd Avenue, Suite 105  
Seattle, WA 98101  
Fax (206)343-7522  
Inspection@psccleanair.gov

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**Want a copy of the inspection report or other records from our files?**

Please contact our Records staff: (206) 689-4040 or [RecordsRequest@psccleanair.gov](mailto:RecordsRequest@psccleanair.gov)

**Request copies of records via our web site:**

<http://www.pscleanair.gov/RecordsRequest>

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- Present any information the Agency may not have considered when issuing the NOV

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Fax (360) 586-2253  
[eluho@eluho.wa.gov](mailto:eluho@eluho.wa.gov)  
<http://www.eluho.wa.gov/>

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000839

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000839
<b>Violation Date:</b> 12/14/2022, 12/15/2022, 12/17/2022, 12/19/2022, 12/20/2022, 12/29/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 21** Failure to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test.

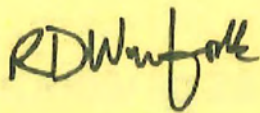
### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere and failed to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test. The source reported the following deviation events in their December deviation report, Offsite Report #30022-38:

- *"On six occasions in December, exhaust gases were diverted to the bypass stack due to the Cold Side Pilot being extinguished as the result of high airflow rate in the pilot zone. The plant confirmed operational status and relit the pilot. During each time period the warm side burners were not affected and warm side gases were being controlled by the enclosed ground flare. The six events were as follows: 12/15 from 3:47 to 3:50, 10:14 to 10:17, and 14:29 to 14:54, 12/19 from 23:44 to 23:48, 12/20 from 00:36 to 00:40, and 12/29 from 19:43 to 19:48."*
- *"On four occasions in December, the 3-hour rolling average combustion temperature for the high fire burner dropped below the 1341°F minimum for a 3-hour rolling average period. These events occurred on 12/14 from 18:00 to 19:00- average 3 hr temperature: 1338, 12/15 from 00:00 to 03:00- average 3 hr temperature: 1338; and 09:00 to 14:00 - average 3 hr temperature: 1282, and 12/17 from 18:00 to 19:00 - average 3 hr temperature: 1326."*

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.



**Issued By:** \_\_\_\_\_

**Date:** \_\_\_\_\_ 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042  
RickW@pscleanair.gov

**Received By:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Signature*

*Print Name*

*Date*

*(Signing is not an admission of guilt)*



## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

### **Do not ignore this Notice of Violation!**

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#### **WITHIN TEN DAYS OF RECEIPT, YOU MUST RESPOND TO THIS NOV IN WRITING**

**Please include:**

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- Your address
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- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

Puget Sound Clean Air Agency  
1904 3rd Avenue, Suite 105  
Seattle, WA 98101  
Fax (206)343-7522  
Inspection@psclicanair.gov

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**Request copies of records via our web site:**

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Olympia, WA 98504-0903  
(360) 664-9160  
Fax (360) 586-2253  
eluh0@eluh0.wa.gov  
<http://www.eluh0.wa.gov/>

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000840

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000840
<b>Violation Date:</b> 1/2/2023, 1/12/2023, 1/18/2023, 1/19/2023, 1/20/2023	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 10** Failure to route vapor waste gases to the enclosed ground flare before being released to the atmosphere.

**NC Order of Approval 11386A Condition 21** Failure to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test.

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, failed to route their vapor waste gases to the enclosed ground flare before being released to the atmosphere and failed to operate the enclosed ground flare at or above the temperature required to achieve 99% destruction efficiency, as established during the most recent source test. The source reported the following deviation events in their January deviation report, Offsite Report #30022-43:

- "On eight occasions in January, exhaust gases were diverted to the bypass stack due to the pilot being extinguished as the result of high airflow in the pilot zone. The plant confirmed operational status and relit the pilot. The eight events were as follows: 1/2 at 10:06, 1/2 from 10:10 to 10:11, 1/2 from 11:31 to 11:47, 1/18 from 12:04 to 12:06, 1/19 at 9:16, 1/19 from 13:26 to 13:28, 1/20 from 6:15 to 6:18, and 1/20 from 7:20 to 7:22."*
- "On one occasion in January, the 3-hour rolling average combustion temperature for the low fire burner dropped below the 1048°F minimum for a 3-hour rolling average period. This event occurred on 1/12 from 17:00 to 18:00. The average 3 hr temperature was 1044°F."*

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

Issued By: \_\_\_\_\_

Rick Woodfork, Inspector, (206) 689-4042

Date: \_\_\_\_\_

5/12/2023

**Received By:** \_\_\_\_\_  
*Signature* *Print Name* *Date*  
*(Signing is not an admission of guilt)*

**IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS****Do not ignore this Notice of Violation!**

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elaho@elaho.wa.gov  
<http://www.elaho.wa.gov/>

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PUGET SOUND

Clean Air Agency

**GENERAL NOTICE OF VIOLATION No. 3-A000841**

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000841
<b>Violation Date:</b> 12/19/2022	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

**Violation of Regulations, WAC, etc.:**

**NC Order of Approval 11386A Condition 41(f)** Failure to immediately cease accepting natural gas from the pipeline after the flow of natural gas ceased to transport from north to south passed the Fredrickson Gate Station.

**Alleged Reason(s) for Violation:**

Puget Sound Energy (LNG Facility), Registration #30022, failed to immediately cease accepting natural gas from the pipeline after the flow of natural gas ceased to transport from north to south passed the Fredrickson Gate Station. The source reported in their December deviation report, Offsite Report #30022-40, that on 12/19/2022, approximately 17,000 dth of natural gas was accepted travelling south to north from Jackson Prairie Gate Station and the plant did not shut down during that time period.

**CORRECTIVE ACTION ORDER: You must take the corrective action described below.**

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

**Issued By:** \_\_\_\_\_**Date:** 5/12/2023

Rick Woodfork, Inspector, (206) 689-4042

RickW@psccleanair.gov

**Received By:** \_\_\_\_\_

Signature

Print Name

Date

*(Signing is not an admission of guilt)*

## **IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS**

### **Do not ignore this Notice of Violation!**

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- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

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**Please include:**

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- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
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Inspection@pscleanair.gov

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Fax (360) 586-2253  
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<http://www.eluh.wa.gov/>

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PUGET SOUND  
Clean Air Agency

## GENERAL NOTICE OF VIOLATION No. 3-A000854

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

<b>Case #:</b>	<b>Registration #:</b> 30022	<b>Violation #:</b> 3-A000854
<b>Violation Date:</b> 2/12/2023	<b>Time:</b>	<b>Certified Mail #:</b> 7021 1970 0000 8941 9648
<b>Violation Location (Address):</b> 1001 E Alexander Ave.		
<b>City:</b> Tacoma	<b>Zip:</b> 98421	<b>County:</b> Pierce
<b>Responsible Person (Name, Title):</b> Ruth Juris, Environmental Scientist		
<b>Facility Name (If applicable):</b> Puget Sound Energy		
<b>Mailing Address:</b> 1001 E Alexander Ave.		
<b>City, State:</b> Tacoma, WA	<b>Zip:</b> 98421	<b>Phone:</b> (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A Condition 15(b)** The enclosed ground flare may not discharge volatile organic compounds (VOC) into the atmosphere in excess of 244 pounds per day, as measured by EPA Method 25A (reported as hexane).

### Alleged Reason(s) for Violation:

Puget Sound Energy (LNG Facility), Registration #30022, caused or allowed the enclosed ground flare to discharge volatile organic compounds (VOC) into the atmosphere in excess of 244 pounds per day, as measured by EPA Method 25A (reported as hexane). The source reported the following in their February deviation report, Offsite Report #30022-46:

*"On February 12, the VOC limit was exceeded. A total of 351 lb/day of VOC was emitted that day due to high fire burner combustion temperature control scheme issues and multiple restarts of the warm high fire burner."*

### CORRECTIVE ACTION ORDER: You must take the corrective action described below.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

Issued By: \_\_\_\_\_

Date: \_\_\_\_\_

5/12/2023

Rick Woodfork, Inspector, (206) 689-4042  
RickW@psc Clean Air.gov

Received By: \_\_\_\_\_

Signature

Print Name

Date

(Signing is not an admission of guilt)

**IMPORTANT: RESPONSE REQUIRED WITHIN TEN (10) DAYS****Do not ignore this Notice of Violation!**

- Your violations may result in a civil penalty (monetary fine).
- Receiving a NOV does not necessarily mean you will receive a civil penalty, nor does correcting the violation ensure that you will not receive a civil penalty.
- Penalties are based on the information in our files, the corrective action you take, your written response to this NOV, and any other information you present to the Agency.
- If your violations are significant, the Agency may commence a court action against you and/or your business.
- If your violations continue, each day is considered a separate and distinct violation and may be subject to increased civil penalties.
- Details about penalty exclusions for unavoidable excess emissions are provided in WAC 173-400-107.

**WITHIN TEN DAYS OF RECEIPT, YOU MUST RESPOND TO THIS NOV IN WRITING****Please include:**

- Your name and/or business name
- Your address
- Mailing address (if different)
- NOV number (upper right hand corner of the NOV)
- What corrections you have made, or a schedule for making corrections
- What you will do to prevent future violations

**Submit your written response to the Agency via US Mail, fax, or e-mail:**

Puget Sound Clean Air Agency  
1904 3rd Avenue, Suite 105  
Seattle, WA 98101  
Fax (206)343-7522  
Inspection@pscleanair.gov

**Need technical assistance or more time to respond?**

Please contact the Inspector who issued this NOV (contact information on the front page).

**Want a copy of the inspection report or other records from our files?**

Please contact our Records staff: (206) 689-4040 or [RecordsRequest@pscleanair.gov](mailto:RecordsRequest@pscleanair.gov)

**Request copies of records via our web site:**

<http://www.pscleanair.gov/RecordsRequest>

**In addition to the required written response, you may also request a meeting with the Agency to:**

- Discuss the circumstances of the violation
- Ask any questions you have
- Present any information the Agency may not have considered when issuing the NOV

**YOU ALSO HAVE THE OPTION TO FILE AN APPEAL**

**You may file an appeal of the Corrective Action Order in this NOV.** The Pollution Control Hearings Board (PCHB) hears appeals of orders and penalties issued by the Agency. The PCHB is independent and is not part of the Agency. The PCHB's function is to provide you a full and complete administrative hearing, as promptly as possible, followed by a fair and impartial written decision based on the facts and law.

**Appeals must be sent to the PCHB and a copy of your appeal must be sent to the Agency within 30 days of your receipt of this NOV.** For more information about how to file an appeal, what information must be included in an appeal, and what to expect from the appeal process, please contact the PCHB:

Pollution Control Hearings Board  
PO Box 40903  
Olympia, WA 98504-0903  
(360) 664-9160  
Fax (360) 586-2253  
[eluho@eluho.wa.gov](mailto:eluho@eluho.wa.gov)  
<http://www.eluho.wa.gov/>

Complete information about appeal requirements is contained in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and in the PCHB regulations (Chapter 371-08 WAC). RCW and WAC are available online.

June 21, 2023

**DELIVERED VIA E-MAIL**

Puget Sound Clean Air Agency  
Attn: Rick Woodfork, Inspector; Chris Kitchen, Inspection Manager  
1904 3rd Avenue, Suite 104  
Seattle, WA 98101-3317  
Inspection@psccleanair.org; RickW@psccleanair.gov; ChrisJK@psccleanair.gov

Re: Notices of Violation for the Puget Sound Energy Tacoma Liquefied Natural Gas Facility at 1001 E Alexander Ave., Tacoma, WA, 98421, Registration Number 30022

Dear Mr. Woodfork,

Puget Sound Energy (“PSE”) is in receipt of Notices of Violation (“NOV”) dated May 12, 2023, which allege that PSE’s Tacoma liquefied natural gas (“LNG”) facility (“TLNG” or the “Facility”) violated conditions of Notice of Construction (“NOC”) Order of Approval 11386A issued by the Puget Sound Clean Air Agency (“PSCAA” or “the Agency”). The allegations in the NOV’s pertain to self-reported events. As explained in my email on June 9, 2023, to Mr. Kitchen, PSE became aware of the NOV’s on June 8, 2023, when the Agency delivered these documents to PSE via USPS. We understand that the Agency also delivered the NOV’s via certified mail to PSE on May 15, 2023, but they did not reach the addressee Ruth Juris until June 8, 2023. PSE requested more time to respond to the NOV’s given the number of documents requiring response. PSE appreciated Mr. Kitchen’s email that same day providing PSE until June 21, 2023 to provide this response.

This response addresses each of the incidents identified in the following and NOV’s, including the corrective actions that PSE has undertaken and what PSE has done to prevent recurrence:

- 3-A000804
- 3-A000805
- 3-A000806
- 3-A000807
- 3-A000808
- 3-A000809
- 3-A000826
- 3-A000827
- 3-A000828
- 3-A000829
- 3-A000830
- 3-A000837
- 3-A000838
- 3-A000839
- 3-A000840
- 3-A000841
- 3-A000854

PSE has worked diligently to identify and address the root causes of the incidents identified in the NOVs and take appropriate action to reduce the likelihood of recurrence. As of the date of this letter, PSE believes that all corrections have been made.

As you know, TLNG is a new facility. The Agency issued its original NOC 11386 on December 19, 2019, and subsequently amended it with NOC 11386A on September 14, 2022. Compliance performance testing was conducted as required by the NOC on February 21-22 and March 5, 2022, as PSE reported to the Agency on April 1, 2022. PSE notes that certain of these NOVs pertain to events that occurred during or soon after commissioning. Despite the fact that the operators were starting up custom-built equipment for the first time, optimizing operations, and tuning instrumentation and controls, the facility continuously worked to minimize operational incidents and operate within the parameters of the permit.

## **I. Permit Conditions 10 and 21**

### **a. Flare Controls Resolution**

A number of the NOVs relate to instances in which gases being directed to the ground flare were instead directed to the diversion vent (Condition 10); at times, this coincided with instances in which the flare operated below the minimum temperatures established via source testing (Condition 21). These two events often shared a root cause, which was the flare combustion temperature control system. This issue has been addressed through iterative tuning that was conducted to better improve the flare's performance and its stability. Issue resolution involved working with LFG, the flare's manufacturer, as well as outside experts to conduct root cause analyses and tune the flare. While PSE continues to assess additional potential actions to further improve flare performance and stability generally, the incidents identified in the following NOVs have been addressed and there have been no flare diversion events related to the flare combustion temperature control system since mid-February 2023.

Specifically, the flare began experiencing performance and stability issues during the tuning process in commissioning. This included temperatures rising too high and falling too low, instability of the burner, and instances in which the burner pilot lights would go out. This resulted in diversions to the bypass as a safety measure to protect human health and welfare as well as facility equipment. PSE worked with both the facility's Engineering, Procurement, and Construction contractor CB&I and LFG to tune the burner controls, and to investigate and troubleshoot the performance of the control system, until March 2022 when CB&I demobilized. PSE continued its work with LFG to investigate and troubleshoot the performance of the control system.

Meanwhile, PSE began exploring other options to resolve these challenges more quickly. In September 2022, PSE reached out to experts in flare design and operation to seek further assistance to address the flare performance and stability issues. PSE ultimately retained Zeeco, a leading flare manufacturing company, whose experts determined that many of the issues TLNG experienced with the flare were related to the operating control programming and not isolated electrical or mechanical issues as previously understood. Zeeco determined that the set points

for the various flare parameters were causing temperature fluctuations which resulted in unstable burner operations and the pilot being blown out, thus resulting in diversions to the bypass. Zeeco visited the facility on February 13, 2023 to adjust the set points for the high-fire burner, which improved the operation of that burner, resulting in a more consistent temperature maintenance. Although operations had generally normalized, PSE proactively engaged Zeeco to return to the facility at the end of April 2023 to optimize the tuning of temperature controls. The flare has continued to operate more consistently and stably, and there have been no diversion events related to the flare combustion temperature control system since Zeeco's initial February 2023 visit. PSE continues to engage with Zeeco to explore additional potential changes to further improve burner operations.

These flare improvements will address diversions due to flare instability caused by the flare combustion temperature control system, as described in the NOVs listed below in Table 1. PSE also took immediate corrective actions in the wake of each instance noted in these NOVs, as follows:

<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
3-A000804	4/5/2022	On April 5, 2022, the flare manufacturer was conducting maintenance on the enclosed ground flare air flow controls. During that time, the pilot lights were operating and assist gas was being combusted in the flare to simulate normal operation of the large warm burner. Because the plant liquefaction equipment was shut down, only trace amounts of waste gas (e.g., gas chromatograph speed loops) were being combusted. There were 2 nonconsecutive minutes on this day where the enclosed ground flare experienced a loss of flame due to inconsistent air flow as a result of the maintenance activities. When that occurred process safety measures were automatically activated, and the gases being directed to the flare were instead directed to the diversion vent. The first bypass event occurred from 14:07 to 14:08 (1 Minute) and the second bypass event occurred from 15:59 to 16:00 (1 Minute).	<p>In response to each event, the flare was restarted.</p> <p>On April 8, 2022, PSE raised the set point on the temperature controller to improve the temperature swings in the flare. PSE also replaced the diffuser (which was damaged) on April 12, 2022. PSE has since implemented a preventative maintenance program for the warm high-fire burner that requires inspections of equipment every three months.</p>
	4/6/2022	On April 6, 2022, the flare manufacturer was continuing its maintenance activities under the same circumstances as the prior day ( <i>i.e.</i> , the plant was not liquefying). There were 26 minutes reflecting three nonconsecutive periods where the enclosed ground flare experienced a loss of flame due to inconsistent air flow as a result of the maintenance activities. As on the prior day, process safety measures were automatically activated, and waste gases were directed to the diversion vent. The first bypass event occurred from 13:58 -13:59 (1 Minute); the second bypass event from 14:50 to 15:01 (12 Minutes); the third bypass event occurred from 15:57 –16:09 (13 Minutes).	<p>In response to each event, the flare was restarted.</p> <p>On April 8, 2022, PSE raised the set point on the temperature controller to improve the temperature swings in the flare. PSE also replaced the diffuser (which was damaged) on April 12, 2022. PSE has since implemented a preventative maintenance program for the warm high-fire burner that requires inspections of equipment every three months.</p>

<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
3-A000805	3/29/2022	On March 29, 2022, there were 12 minutes where an unexpected upset occurred in pre-treatment. The upset activated the process safety control measures where process gases were routed through the diversion vent rather than being routed to the flare. This event started at 09:56 and ended at 10:07 when the process was stabilized and returned to normal operations.	<p>The event was caused by foaming in the pretreatment system and was immediately addressed by adding an antifoaming agent to the system. The facility also has instituted a process to better prevent foaming. This includes replacing the carbon bed in the pretreatment system, flushing the system, sampling the system for particulates quarterly and sampling daily when liquefying. Sampling results are used to determine whether antifoaming should be added preventatively. While foaming still occurs, as is expected of an amine system, no severe foaming issues have since recurred.</p> <p>PSE continued to work with LFG to optimize the control system to ensure the flare will continue to operate even during plant upset events.</p>
	3/29/2022	On March 29, 2022, there were 20 minutes where plant experienced a loss of flame due to inconsistent air flows into the flare. With a loss of flame, process safety measures were automatically activated, and waste gases were directed to the diversion vent. This event started at 11:04 and ended at 11:23, when air flow was stabilized, and the flare was returned to service.	<p>The event occurred upon startup after the shutdown caused by the foaming event that morning. The natural gas in the system had cooled and caused condensation in knockout drum V201. The ramp-up of the facility caused the flare to become unstable, resulting in a trip.</p> <p>PSE continued to work with LFG to optimize the control system to ensure the flare can handle ramp-ups after plant upsets.</p>
	3/29-3/30/2022	On March 29, 2022 and March 30, 2022, there were short, unexpected upsets. These upsets occurred on March 29, 2022 from 20:22–20:26 for a duration of 5 minutes; 23:15 for a duration of 1 minute; on March 30, 2022 from 00:30–00:42, for a duration of 13 minutes; and 01:19–01:22 for a duration of 4 minutes, respectively. During these events, process safety measures were automatically activated, and waste gases were directed to the diversion vent until the flare was returned to service.	PSE contacted LFG to troubleshoot this incident. Troubleshooting/maintenance occurred on April 5 and 6, 2022, as described above in the response for 3-A000804.

<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
3-A000807	2/2/2022	On February 4, 2022, there were four minutes where an unexpected upset occurred in pre-treatment following the startup of liquefaction on February 3, 2022. The upset activated safety control measures where process gases were routed through the diversion vent rather than being routed to the flare. This event started at 04:26 and ended at 04:30. During that same hour the large warm burner operated slightly above its normal maximum heat input range as the systems were brought back online.	<p>This incident was caused by a foaming event and prompted the investigation that identified the corrective actions discussed above for NOV 3-A000805 that were later implemented. At the time, the facility used an antifoaming agent to immediately address the issue.</p> <p>PSE continued to work with LFG to optimize the control system to ensure the flare will continue to operate even during plant upset events.</p>
	2/2/2022	On February 4, 2022, there were two minutes where process gases were routed through the diversion vent rather than being routed to the flare. This event started at 16:32, when safety control measures routed the process gases to the diversion vent, and ended at 16:34.	The bypass was the result of an emergency stop being activated on the Mixed Refrigerant Compressor due to a process surge during shutdown of liquefaction. The facility reviewed the incident and made minor changes to the shutdown procedures to prevent recurrence. PSE also worked with LFG to ensure the flare can handle swings in operations.
3-A000808	6/14/2022	<p>The warm low fire burner experienced three, two-minute diversion events, for a total of six minutes, due to the flare pilot flame monitoring system inaccurately reporting the loss of flame in the pilot. Believing that there was a loss of flame, process safety measures were automatically activated, and waste gases being routed to the flare were directed to the diversion vent.</p> <p>These unplanned bypass events contributed to one, three-hour average temperature value of 1028° F for the three-hour period ending with the 10:00 hour. This is below the minimum temperature of 1048° F established by the most recent performance test.</p>	<p>In response to each event, the flare was placed into shutdown mode and exhaust gases within the process systems were contained until the flare was restarted.</p> <p>As reported in July 2022, the facility also reviewed the controls logic associated with the flare pilot flame monitoring system and updated the programming to adjust the set point for detection of the pilot.</p>



<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
	6/15/2022	The warm low fire burner experienced one, 1-minute diversion event due to the flare pilot flame monitoring system inaccurately reporting the loss of flame in the pilot. Believing that there was a loss of flame, process safety measures were automatically activated, and waste gases being routed to the flare were directed to the diversion vent. A bypass event occurred at 9:06 (1 Minute). In response to this event, the flare was placed into shutdown mode and exhaust gases within the process systems were contained until the flare could be restarted.	In response to each event, the flare was placed into shutdown mode and exhaust gases within the process systems were contained until the flare was restarted.  As reported in July 2022 ,the facility also reviewed the controls logic associated with the flare pilot flame monitoring system and updated the programming to adjust the set point for detection of the pilot.
3-A000809	7/6/2022	On July 6, 2022 while the facility was in holding mode ( <i>i.e.</i> , not producing LNG), the enclosed ground flare went into an unplanned shutdown and experienced two bypass events, due to the proper activation of process safety measures. The unplanned shutdown occurred during maintenance and tuning of the flare. Waste gases being routed to the flare were directed to the bypass stack from 12:03 – 12:05 (3 Minutes) and at 12:17 (1 Minute).	Once the plant identified the cause of the unplanned shutdown, the unit was safely restarted and returned to full operation.  PSE continued to work with LFG to further tune the flare.
	7/21/2022	On July 21, 2022, while the facility was liquefying, the controls system notified the operators of a low-temperature condition on the warm side high-fire combustion temperature thermocouple. The alarm condition was addressed at 14:23. Prior to the update being completed, there were four, three-hour average temperature values slightly below the minimum temperature of 1341° F established for liquefying mode operations by the most recent performance test.	As reported on August 30, 2022, the operators took action to investigate the alarm. The troubleshooting identified the need of an update to the control system software, which was performed. PSE also called LFG, who helped adjust the air-to-MMBTU value in an effort to maintain combustion temperature.
	7/26/2022	On July 26, while the facility was liquefying, the enclosed ground flare experienced four, intermittent bypass events due to the proper activation of process safety measures when a fault indication arose on the cold side low-fire pilot temperature thermocouple. The plant had no indication the pilot was not lit, and the burner was confirmed to still be in operation. As a result of the fault indication, exhaust from the cold side burner (which consists of nitrogen and a small amount of assist gas) was routed to the bypass stack resulting in intermittent bypass events occurring from 04:29 – 04:33 (5 Minutes), 06:37 – 06:39 (3 Minutes), 07:40 – 07:42 (3 Minutes) and 07:50 – 07:51 (2 Minutes) respectively.	At the time, PSE believed this incident was caused by an electrical issue, because a fault indicator identified an abnormality. After performing an appropriate inspection the pilot was relit.  PSE continued to work with LFG to further tune the flare.

<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
	7/30/2022	On July 30, while the facility was liquefying, the enclosed ground flare experienced three, intermittent bypass events due to the proper activation of process safety measures when a fault indication arose on the cold side low-fire pilot temperature thermocouple. The plant had no indication the pilot was not lit, and confirmed the burner was still in operation, however, troubleshooting indicated there was an issue with the wiring to the temperature element causing the diversions. As a result of the fault indication, exhaust from the cold side burner (which consists of nitrogen and a small amount of assist gas) was routed to the bypass stack resulting in intermittent bypass events occurring from 06:38 - 06:45 (8 minutes), 06:57 – 06:58 (2 minutes) and 07:09 – 07:17 (9 minutes) respectively.”	At the time, PSE believed this incident was caused by an electrical issue, because the fault indicator identified an abnormality. After performing an appropriate inspection the pilot was relit.  PSE continued to work with LFG to further tune the flare.
3-A000826	8/1/2022; 8/7/2022; 8/19/2022; 8/22/2022; 8/25/2022; 8/28/2022	During the month of August, the enclosed ground flare experienced bypass events related to the proper activation of process safety measures. The bypass events during liquefying occurred when a fault indication noted a low fire pilot temperature causing exhaust gas to be routed to the bypass stack.	PSE replaced a broken temperature indicator and raised the burner diffuser temperature set point.  PSE continued to work with LFG to further tune the flare.
	8/5/2022	On August 5, 2022, the enclosed ground flare experienced a control logic issue with the air/fuel ratio controller while liquefying. This resulted in the burner not maintaining a minimum 1341°F minimum temperature for four 3-hour rolling averaging periods. The 3-hour average temperatures ranged from a low of 1337°F to a high of 1340°F.	The facility increased the ratio control range permitted on the controller from 15% to 20% to provide a larger range before ratio controls are automatically activated.  PSE continued to work with LFG to further tune the flare.
	8/27/2022	On August 27, 2022, as the liquefaction system was starting up after maintenance, the enclosed ground flare was brought up to temperature slowly. The lowest temperature during this period was 1170°F for the 3-hour period ending with 02:00 on August 27th as the startup of liquefaction began. The last period of low temperature, the 3-hour average period ending with 12:00 on August 28th, was 1323°F. After that time, the minimum 3-hour average liquefaction temperature of 1341°F was maintained.	The facility continued to work with LFG to tune the controls so that the control scheme would bring up the temperature to the required minimum when operating at the low end of the firing rate.

<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
3-A000827	9/29/2022	On September 29, 2022, while the facility was liquefying, the enclosed ground flare vent experienced one bypass event due to the proper activation of process safety measures. The bypass event occurred when a fault indication noted a low fire pilot temperature activating the bypass, where exhaust gas was routed to the bypass stack. Waste gases being routed to the flare were directed to the bypass stack from 12:48 – 12:50 (3 Minutes).	<p>The pilot was verified to be in service and the fault indication was reset.</p> <p>By this time, PSE was identifying outside experts to address the ongoing flare issues.</p>
3-A000828	10/1/2022	During the month of October, the enclosed ground flare vent experienced four bypass events due to the proper activation of process safety measures, which resulted in exhaust gas being routed to the bypass stack. These events, their dates, times, duration and cause are listed below: October 1, 2022, from 12:00 AM – 12:14 AM, for 15 minutes, due to a BTU Analyzer Malfunction.	<p>The facility replaced the BTU analyzer sample pump and arranged for service of the analyzer.</p> <p>PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.</p>
	10/2/2022	During the month of October, the enclosed ground flare vent experienced four bypass events due to the proper activation of process safety measures, which resulted in exhaust gas being routed to the bypass stack. These events, their dates, times, duration and cause are listed below: October 2, 2022, from 8:38 AM – 8:43 AM, for 6 minutes in duration, due to Cold Side Pilot being extinguished due to high airflow rate in the pilot zone.	<p>The pilot was re-lit.</p> <p>PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.</p>
	10/18/2022	During the month of October, the enclosed ground flare vent experienced four bypass events due to the proper activation of process safety measures, which resulted in exhaust gas being routed to the bypass stack. These events, their dates, times, duration and cause are listed below: On October 18, 2022, from 11:18 AM – 11:19 AM, for 2 minutes in duration, due to Cold Side Pilot being extinguished due to high airflow rate in the pilot zone, the plant relit the pilot; On October 18, 2022, from 1:02 PM to 1:04 PM, for 3 minutes in duration, due to inlet gas compressor trip due to loss of signal to the temperature controller.	<p>The facility identified a mechanical problem causing the inlet gas compressor to trip due to loss of signal. The wiring was repaired.</p> <p>PSE implemented an annual preventative maintenance check on all process instrumentation.</p> <p>PSE continued to work with its outside experts to resolve the interactions within the flare combustion temperature control systems.</p>

<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
	10/23/2022	On October 23, 2022, the enclosed ground flare experienced a high diffuser temperature alarm while liquefying. In response, the combustion temperature was decreased so that the diffuser temperature returned to its normal range. This resulted in the burner not maintaining a minimum 1341°F minimum temperature for three, 3-hour rolling averaging periods. The 3-hour average temperatures ranged from a low of 1324°F to a high of 1338°F.	PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.
3-A000829	11/6/2022	On November 6 at 3:00 AM, the 3-hour rolling average combustion temperature for the high fire burner dropped below the 1341°F minimum for one 3-hour rolling averaging period, with a temperature of 1334°F. The low temperature was attributable to variation in production. The plant adjusted operations to increase combustion temperature.	PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.
	11/19/2022	On November 19, 2022, from 4:15 AM – 4:19 AM, for 5 minutes, exhaust gases were diverted to the bypass stack due to the Cold Side Pilot being extinguished as the result of high airflow rate in the pilot zone. The plant confirmed operational status and relit the pilot. During this time period the warm side burners were not affected and warm side gases were being controlled by the enclosed ground flare.	The pilot was re-lit.  PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.
	12/14/2022; 12/15/2022; 12/17/2022	On four occasions in December 2022, the 3-hour rolling average combustion temperature for the high fire burner dropped below the 1341°F minimum for a 3-hour rolling average period. These events occurred on 12/14 from 18:00 to 19:00- average 3 hr temperature: 1338, 12/15 from 00:00 to 03:00- average 3 hr temperature: 1338; and 09:00 to 14:00 - average 3 hr temperature: 1282, and 12/17 from 18:00 to 19:00 - average 3 hr temperature: 1326.	Both the diversion vent opening and the low combustion temperature events are related to a failed diffuser temperature thermocouple. The facility was shut down on January 3, 2023, to replace the failed diffuser temperature thermocouple. These repairs were completed on January 6, 2023.  PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.

<b>Table 1: Flare Bypass and Temperature Events Resolved Through Improved Control Programming</b>			
<b>NOV</b>	<b>Date</b>	<b>Incident Description Previously Reported to the Agency</b>	<b>Immediate Corrective Action</b>
3-A000839	12/15/2022; 12/19/2022; 12/20/2022; 12/29/2022	On six occasions in December, exhaust gases were diverted to the bypass stack due to the Cold Side Pilot being extinguished as the result of high airflow rate in the pilot zone. The plant confirmed operational status and relit the pilot. During each time period the warm side burners were not affected and warm side gases were being controlled by the enclosed ground flare. The six events were as follows: 12/15 from 3:47 to 3:50, 10:14 to 10:17, and 14:29 to 14:54, 12/19 from 23:44 to 23:48, 12/20 from 00:36 to 00:40, and 12/29 from 19:43 to 19:48.	Both the diversion vent opening and the low combustion temperature events are related to a failed diffuser temperature thermocouple. The facility was shut down on January 3, 2023, to replace the failed diffuser temperature thermocouple. These repairs were completed on January 6, 2023.  PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.
3-A000840	1/2/2023; 1/18/2023; 1/19/2023; 1/20/2023	On eight occasions in January, exhaust gases were diverted to the bypass stack due to the pilot being extinguished as the result of high airflow in the pilot zone. The plant confirmed operational status and relit the pilot. The eight events were as follows: 1/2 at 10:06, 1/2 from 10:10 to 10:11, 1/2 from 11:31 to 11:47, 1/18 from 12:04 to 12:06, 1/19 at 9:16, 1/19 from 13:26 to 13:28, 1/20 from 6:15 to 6:18, and 1/20 from 7:20 to 7:22.	PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.
	1/12/2023 <sup>1</sup>	On one occasion in January, the 3-hour rolling average combustion temperature for the low fire burner dropped below the 1048°F minimum for a 3-hour rolling average period. This event occurred from 17:00 to 18:00. The average 3 hr temperature was 1044°F.	PSE continued to work with its outside experts to address the interactions within the flare combustion temperature control systems.

<sup>1</sup> Upon further investigation in preparation for this response, PSE noted that the date on which this incident occurred was actually January 18, 2023, not January 12, 2023. We have left the January 12 date in the table for consistency with language in the NOV and to avoid confusion.

## **b. Other Flare-Related Issues**

In addition to the incidents identified in Table 1, above, there were additional flare bypass and temperature-related incidents that were resolved outside of the flare combustion temperature control system optimization. These are as follows:

### **i. NOV 3-A000806**

As previously reported, the enclosed ground flare operated during the month of December as part of the commissioning process. On December 13, 2021, there were 6 minutes where, as the result of a warm stream flame failure, process gases associated with commissioning of the liquefier were routed through the diversion vent rather than being routed to the flare. This event started at 16:37 and ended at 16:42 when the flare was successfully reignited. This incident took place during commissioning. During this time, PSE was first starting up the equipment, checking controls, and learning how best to operate the facility. This incident occurred because the facility was commissioning and is not expected to reoccur during ongoing commercial operations.

### **ii. NOV 3-A000807**

As previously reported, the facility experienced a flare flameout on February 23, 2022 that caused 12 minutes where process gases were routed through the diversion vent rather than being routed to the flare. This event started at 03:52, when safety control measures routed the process gases to the diversion vent, and ended at 04:20, when the flare was successfully reignited. The flare lost its flame as the result of a malfunction of the blower motor variable frequency drive. PSE worked with LFG to try to identify the cause of this incident, which could have been mechanical, electrical, or logic-based. While PSE and LFG determined that the issue was not mechanical, we were unable to identify the specific cause. The incident has not recurred.

PSE believes the Agency included the incident reported for February 3, 2022 on this NOV in error. PSE did not self-report a flare bypass on that date.

### **iii. NOV 3-A000809**

As previously reported, while the facility was in holding mode (*i.e.*, not producing LNG) on July 1, 2022, the enclosed ground flare went into an unplanned shutdown and experienced a bypass event due to the activation of the facility's process safety measures. The unplanned shutdown occurred when the plant was conducting routine preventative maintenance checks of the Fire and Gas Safety System, which is external to the flare. The shutdown occurred because the flare trip was not properly inhibited prior to initiating the test. As a result, the flare went into shutdown mode and the exhaust gas was routed to the bypass stack. Once the plant identified the cause of the unplanned shutdown, the unit was safely restarted and returned to full operation. Waste gases being routed to the flare were directed to the bypass stack from 14:56 – 15:12 (17 Minutes). The flare also

experienced four, rolling three-hour average temperature values below the minimum temperature of 1048° F established by the most recent performance test for operation in holding mode as a result of the unplanned flare shutdown.

This incident occurred during the first preventative maintenance (PM) performed on the Fire and Gas Safety System (which includes fire and gas detectors, beacons, and horns), because the Fire and Gas Incident List did not include a detector that had been subsequently added near the flare. PSE has changed its procedures to keep a Fire and Gas Instrument master list current in one location to ensure accuracy. PSE also learned from this incident that the fire and gas detector must be inhibited from tripping the flare during testing, so as not to trigger an unplanned shutdown. PSE updated the Fire and Gas PM procedure to ensure this detector is inhibited prior to testing.

On July 14, 2022, the facility experienced one three-hour average temperature value below the minimum temperature of 1048° F established for holding mode operations by the most recent performance test. The incident occurred because the assist gas did not ramp up quickly enough to raise the temperature. The next morning, the facility management team discussed how to address low combustion temperatures with the operators.

On July 22, 2022, while the facility was liquefying, the enclosed ground flare went into an unplanned shutdown and experienced a bypass event due to the proper activation of process safety measures. The unplanned shutdown occurred when the BTU analyzer was undergoing calibration for the warm side of the flare and went into an alarm condition which shut down the flare. The plant went into holding mode while operators worked to troubleshoot the alarm. As a result of the unplanned shutdown, waste gases being routed to the flare were directed to the bypass stack from 13:27 – 16:01 (155 Minutes).

Troubleshooting identified a problem with the igniter connection that required visual inspection inside the flare. To go inside the flare, the feed streams to the flare must be isolated for personal safety which prevents waste gases from being routed to flare or bypass stack. During the inspection, it was identified that an electrical short was preventing the restart of the flare because the failsafe condition locked out the igniter. The operators made the necessary repairs to address the short, and the unit was then safely restarted and returned to full operation.

PSE also determined based on this incident that calibration of the BTU analyzer while the high-fire burner is operating causes an unplanned shutdown. PSE has revised the PM to ensure that calibration of the BTU analyzer is not performed when using the high-fire burner.

#### **iv. NOV 3-A000826**

As PSE previously reported, during the month of August 2022, as the facility was in holding, the enclosed ground flare experienced two (2) 3-hour average temperature

values below the minimum temperature of 1048°F established for holding mode operations. The temperature during the 3-hour period ending with 11:00 on August 11th was 1032°F and the 3-hour period ending with 18:00 on August 31 was 1045°F. The facility staff held an onsite meeting about the issue, and implemented a new night order system on September 1, 2022, which clearly identifies the triggers for adding more assist gas for the operators.

**v. NOV 3-A000829**

As PSE previously reported, PSE determined on November 6, 2022 that the pipeline directional flow would likely reverse direction (i.e., move from south to north at the Fredrickson Gate Station) on November 7, 2022. As a result, at approximately 4:00 PM on November 6, 2022, notice was transmitted to the facility staff alerting them to the impending event and directing them to cease liquefaction. The plant immediately began the process of shutting down liquefaction and shifting into holding mode. As a result, operation shifted from the high fire burner to the low fire burner. Starting with the 3-hour rolling average ending at 6:00 PM and ending with the 3-hour rolling average ending on November 7 at 1:00 AM, the low fire burner was operating but did not maintain the 1048°F minimum 3-hour rolling average temperature. The average temperature for this period was 918°F. The plant increased assist gas to the low fire burner to increase combustion temperature.

PSE conducted additional operator training to address maintaining the required temperature during controlled shutdowns.

**II. Conditions 15(d) and 16(d) incorporating Regulation I, Article 12.03(b) (Sufficiency of monitoring data)**

As described in PSE's December 2022 report and in **NOV 3-A000830**, the stack flowmeter achieved 94.2% of valid hours of monitoring data. The issue was related to the lack of adjustability of the original equipment manufacturer's ("OEM") meter design. To address the issue and improve calibration, PSE added a fine adjustment valve to the meter to allow for more precise tuning. Since making this change, this event has not recurred. Nevertheless, PSE will continue to evaluate the performance of the flow meter and ways to improve its reliability.

As described in PSE's March 2023 report and in **NOV 3-A000837**, the cold SO<sub>2</sub> analyzer achieved 94% of valid hours of monitoring data and so did not meet the 95% minimum data availability requirement for the month. The cold SO<sub>2</sub> analyzer accumulated 39 invalid hours during January. Nine hours of downtime were due to a communication fault between the analyzer and the CEMS database and the time it took to troubleshoot the issue. One hour of downtime was due to manually rerunning the daily calibration check after the communication fault and the other 29 hours of downtime were due to the required daily calibration checks. Since February 4, 2023, PSE has implemented timesharing on the SO<sub>2</sub> analyzers so that when one analyzer is in calibration, the other



analyzer will monitor both streams that feed the flare. This should eliminate the hour of downtime each day due to the daily calibration check

As described in PSE's prior reporting in March 2023 and in **NOV 3-A000838**, the warm SO<sub>2</sub> analyzer achieved 91% of valid hours of monitoring data and did not meet the 95% minimum data availability requirement for the month. The warm SO<sub>2</sub> analyzer accumulated 56 invalid hours during February.

- Three hours of downtime were due to the required daily calibration check. This issue was addressed on February 4, 2023, when calibration timesharing was implemented.
- Sixteen hours of downtime on February 7, 2023, were due to a failed rotor on the analyzer sample injection valve, which caused the daily calibration check to fail. The rotor was replaced and the faulty rotors were sent to the OEM for evaluation and further assessment.
- Twenty-nine hours of downtime were due to a failed daily calibration check on February 18, 2023 due to the failure of communication between the analyzer and programmable logic controller ("PLC"). The facility initially recalibrated and reestablished communication between the analyzer and PLC. The facility then had the OEM analyzer tech on-site during the week of June 5, 2023, to evaluate system operation and reliability. The OEM analyzer tech identified potential software malfunctions with the OEM PLC programming causing failed calibrations. The analyzer vendor and the PLC vendor implemented software changes to allow for improved communication and system reliability.
- Eight hours of downtime on February 20, 2023 were due to an erroneous setting in the analyzer configuration file provided by the equipment manufacturer that resulted in a failed daily calibration check. The analyzer configuration file was updated.

### **III. Condition 41(f) (Natural gas flow reversal)**

As described in PSE's prior self-reporting and in **NOV 3-A000841**, PSE determined that, on December 19, 2022, the gas flow was essentially neutral at Fredrickson Gate Station (*i.e.*, gas flow from the north exceeded plant demands, but some gas flowed from the south for a portion of the day) while the plant was liquefying. As described in PSE's semiannual report dated January 13, 2023, "On that day, approximately 46,000 dth of gas was accepted at the Fredrickson Gate Station. Of that amount, the actual use records suggest that approximately 29,000 dth came from the north and approximately 17,000 dth came from the south (*i.e.*, Jackson Prairie which contains 98-99% Canadian gas). Of the approximately 46,000 dth of gas accepted by PSE at the Fredrickson Gate Station on December 19th, approximately 13,000 dth was delivered to Tacoma LNG."

As the Agency is aware, PSE relies on a predictive model to determine the anticipated direction of the gas flow. This is the best information available upon which to base operating decisions as required by Condition 41(f). The model is highly accurate, although will fail to correctly predict the gas direction from time to time. In this instance, the model's prediction was incorrect when the actual gas flow data subsequently became available. PSE continues to monitor the model daily and adjust operations as necessary depending upon the model's results.

#### **IV. Condition 15(b) (VOC emission limit )**

As described in PSE's prior self-reporting and in **NOV 3-A000854**, the VOC limit was exceeded on February 12, 2023. A total of 351 lb/day of VOC was emitted that day due to high fire burner combustion temperature control scheme issues and multiple restarts of the warm high fire burner.

A root cause analysis of the exceedance event was conducted and corrective actions taken. The burner was subsequently operated with compliant emissions. The corrective actions consisted of control improvements provided by a third-party combustion control expert Zeeco, as described above. PSE also provided additional control room operator training emphasizing the need to shut down the burner if emissions are approaching the limit so that maintenance can be performed. PSE and the operator also enhanced control room monitoring, including relocation of the CEMS display to be directly in front of the operators, and modification of alarms to alert the operators audibly and visually when emissions are approaching the limit so that action can be taken.

#### **V. Condition 19 (Visible emissions/performance of Method 22)**

As described in PSE's prior self-reporting and in **NOV 3-A000807**, starting on February 2, 2022, PSE believes that visible emissions occurred from the flare as the plant was shifting from holding to liquefaction. At approximately 22:28 on February 2, 2022, the flare shifted from the low-fire burner to the high-fire burner as designed. During this time, LFG was adjusting combustion air settings on the low-fire burner, and the inlet air settings were inadvertently not returned to their normal positions. As a result, after the burner transition early in the morning of February 3, 2022, the high-fire burner had reduced inlet air and the flame length was extended. This was identified through the numerous plant systems and by approximately 03:16 that morning operations were returned to normal. Although a Method 22 was not performed and the combination of night-time and fog made any determination as to opacity difficult, PSE believes that visible emissions were likely from this event.

PSE has changed the procedures for making changes to the controls to prevent inadvertent changes in the future. LFG no longer has remote access to the controls; access must be granted on a case-by-case basis by PSE as needed. PSE also has updated its Method 22 Procedure to clarify the requirement for performing the Method when unanticipated visibility events occur during non-daylight hours. An operations

communication was issued to plant staff about the clarification and additional training was conducted for plant operators.

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In all of PSE's self-reported incidents and as described in the above referenced NOV's, PSE has endeavored to timely report incidents when they occur, to take timely corrective action, and to implement steps and engage experts to prevent recurrence. PSE works to maintain open and transparent communication with the Agency and has already completed corrective actions to prevent recurrence for all of the incidents noted in each NOV. This is the case for incidents that occurred during and soon after the commissioning process when the operators were learning how to run and tune the equipment, as well as for incidents that required longer-term tuning of newly installed, customized facility equipment with the assistance of the original equipment manufacturers and outside experts. PSE strongly values operating in compliance with its permits and will continue to dedicate resources to the further improvement and fine-tuning of TLNG's performance as needed.

We would welcome the opportunity to discuss the information provided in this letter. Please do not hesitate to reach out with any questions .

Sincerely,



Dustin Cornidez-Pittman  
Manager Environmental Services  
Puget Sound Energy

CC: Lorna Luebbe  
Sara Leverette  
Ruth Juris  
Jake Green  
Joshua Frank  
Allison Watkins Mallick  
Tom Wood



PUGET SOUND  
Clean Air Agency

## WRITTEN WARNING No. 2-A000095

1904 3rd Avenue, Suite 105 Seattle, WA 98101 • p 206.343.8800 toll-free 800.552.3565

### Other Written Warning

Certified Mail #: 7021 1970 0000 8941 9648		Violation #: 2-A000095
Case #:	Registration #: 30022	Violation Date: 11/6/2022
Violation Location (Address): 1001 E Alexander Ave.		
City: Tacoma	Zip: 98421	County: Pierce
Responsible Person (Name, Title): Ruth Juris, Environmental Scientist		
Facility Name (If applicable): Puget Sound Energy		
Mailing Address: 1001 E Alexander Ave.		
City, State: Tacoma, WA	Zip: 98421	Phone: (509) 773-7919

### Violation of Regulations, WAC, etc.:

**NC Order of Approval 11386A, Condition 41(f)(i)** Failure to submit a report within 15 days of discovering that the natural gas pipeline supplying the Tacoma LNG facility ceased to transport gas from north to south passed the Fredrickson Gate Station.

### Violation Description:

Puget Sound Energy (LNG Facility), Registration #30022, failed to submit a report within 15 days of discovering that the natural gas pipeline supplying the Tacoma LNG facility ceased to transport gas from north to south passed the Fredrickson Gate Station. PSE became aware of the event on 11/6/22 meaning the report should have been submitted no later than 11/21/22. Agency records show the report was submitted on December 6, 2022, 30 days past the date they became aware of the event. The source describes the event in question in Offsite Report #30022-32:

*"On November 6, 2022, PSE identified that the pipeline directional flow would likely reverse direction (i.e., move from south to north at the Fredrickson Gate Station) on November 7, 2022. As a result, at approximately 4:00 pm on November 6, 2022, notice was transmitted to the facility staff alerting them to the impending event and directing them to cease liquefaction. The last day of the reversal was November 9, 2022, i.e., by November 10, 2022 gas was flowing again from the north. The plant returned to liquefaction on November 14, 2022."*

If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty. This Agency will contact you and/or Corporate if your corrective action for this notice was not received or was insufficient, otherwise consider this document closed.

Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action(s) you have taken to correct this violation and achieve compliance with Agency regulations.

Issued By: \_\_\_\_\_

Rick Woodfork, Inspector, (206) 689-4042

Date: \_\_\_\_\_

5/12/2023



Received By: \_\_\_\_\_

*Signature*

*Print Name*

*Date*

*(Signing is not an admission of guilt)*

Large rectangular area with faint horizontal lines, likely a signature or data entry field.

## What you need to know about this Written Warning

**Do not ignore this document!** This Written Warning offers you an opportunity to promptly correct the violation and avoid potential civil penalties. If you fail to address this violation, a Notice of Violation (NOV) and civil penalty can be issued against you. In the case of significant violations, a civil suit may be brought against you and your business.

**You must respond, promptly!** Correct the problem as soon as possible. Write a letter to the Agency Inspector who issued the Written Warning by the date requested. Tell the Inspector:

- Your name;
- Name and address of the facility;
- Mailing address (if different than written on Written Warning);
- What you have corrected or a schedule for making corrections; and
- What you will do to prevent future violations.

**You may also call the Inspector to schedule a conference with Agency staff to:**

- Discuss any extenuating circumstances or questions you may have;
- Review your corrective actions; or
- Present information that may not have been considered when the Written Warning was issued.

**If you need technical assistance, or to request an extension of time,** please contact the Inspector.

**You may receive a copy of the Inspection Report --**

By calling our office at 206-689-4030 or by submitting online at [www.pscleanair.gov/recordsrequest](http://www.pscleanair.gov/recordsrequest)

**This is a Written Warning. It cannot be appealed.**

June 21, 2023

**DELIVERED VIA E-MAIL**

Puget Sound Clean Air Agency

Attn: Rick Woodfork, Inspector; Chris Kitchen, Inspection Manager

1904 3rd Avenue, Suite 104

Seattle, WA 98101-3317

Inspection@psccleanair.org; RickW@psccleanair.gov; ChrisJK@psccleanair.gov

Re: Written Warning 2-A000095 for the Puget Sound Energy Tacoma Liquefied Natural Gas Facility at 1001 E Alexander Ave., Tacoma, WA, 98421, Registration Number 30022

Dear Mr. Woodfork,

Puget Sound Energy (“PSE”) is in receipt of the Written Warning dated May 12, 2023, which alleges that PSE’s Tacoma liquefied natural gas (“LNG”) facility (“TLNG” or the “Facility”) has violated Condition 41(f)(i) of Notice of Construction (“NOC”) Order of Approval 11386A issued by the Puget Sound Clean Air Agency (“PSCAA” or “the Agency”). The allegation in the Written Warning pertains to a self-reported event. As explained in my email to Mr. Kitchen on June 9, 2023, PSE became aware of the Written Warning on June 8, 2023, when the Agency delivered it, along with a number of Notices of Violations (“NOVs”), to PSE via USPS. PSE requested more time to respond to the Written Warning and NOVs given the number of documents requiring response. PSE appreciated Mr. Kitchen’s email that same day providing PSE until June 21, 2023 to provide this response.

PSE previously reported to the Agency in its 30-day report on December 29, 2022, that on November 6, 2022 PSE identified that the pipeline directional flow would likely reverse direction on (i.e., move from south to north at the Fredrickson Gate Station) on November 7, 2022. PSE responded to the situation, consistent with the requirements in the air permit, by ceasing liquefaction. However, the 15-day report required by Condition 41.f.i was not submitted until December 6th.

This has now been corrected and procedures have been put in place to prevent recurrence. Specifically, internal processes have been implemented to ensure that when the pipeline flow data is received from the Williams Pipeline, the employee responsible

for reporting to the Agency is timely notified so that any report required under Condition 41.f.i can be made within 15 days of the discovery of flow reversal.

PSE endeavors to timely report incidents when they occur, to take timely corrective action, and to implement steps to prevent recurrence. As you know, TLNG is a new facility. The Agency issued its original NOC 11386 on December 19, 2019, and subsequently amended it with NOC 11386A on September 14, 2022. Compliance performance testing was conducted as required by the NOC on February 21-22 and March 5, 2022, as PSE reported to the Agency on April 1, 2022. PSE strongly values operating in compliance with its permits and will continue to dedicate resources to the further improvement and fine-tuning of TLNG's performance.

Please do not hesitate to reach out with any questions about the information provided in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dustin Cornidez-Pittman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dustin Cornidez-Pittman  
Manager Environmental Services  
Puget Sound Energy

CC: Lorna Luebbe  
Sara Leverette  
Ruth Juris  
Jake Green  
Joshua Frank  
Allison Watkins Mallick  
Tom Wood