

From: [Jonathan Walling](#)
To: [REDACTED]
Cc: [Brad Wynnemer](#); [Claudio Galli](#); [Phillip Wiedenfeld](#); [OCE](#)
Subject: COVID-19 enforcement discretion request: Enbridge Joaquin
Date: Friday, March 27, 2020 8:02:15 PM

Good evening, Mr. Laurie:

The TCEQ will exercise enforcement discretion for the testing of engine 12003. This enforcement discretion will be in effect until April 30, 2020. The required test should be completed as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please re-submit your request.

Regulated entities must maintain records adequate to document activities related to any noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: David Laurie <[REDACTED]>
Sent: Friday, March 27, 2020 3:59 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Brad Wynnemer <[REDACTED]> Claudio Galli <[REDACTED]> Phillip Wiedenfeld <[REDACTED]>
Subject: COVID-19 enforcement discretion request

The Enbridge Joaquin compressor station, RN100217074, operates 2 stroke lean burn engines to compress natural gas for pipeline transmission. 30 TAC 117.8140(b) requires that a quarterly emission test for NOx and CO be conducted for engines that operate more than 10 hours in the quarter.

Engine 12003 was scheduled to be tested in late February with the other 3 engines at the Joaquin station, but was also scheduled for routine maintenance at that time. Since the engine maintenance involved honing the cylinders and other work involving the pistons and compression chamber, Enbridge decided to reschedule the quarterly engine test for the middle of March rather than test the engine and then conduct maintenance that would trigger another test within 2 weeks of completion of the work. Prior to the rescheduled stack tests, Enbridge started to experience delays in parts and equipment to conduct the maintenance work it had started and, by the middle of March, Enbridge started to experience delays in available labor as companies, including our own, started taking more significant measures to socially distance as a result of Covid-19. The other engines at the Joaquin station were able to conduct their quarter emission stack test, but 12003 was

not due to delays in its repair schedule. The stack test for engine 12003 was again rescheduled for March 27th; however, yesterday the station got its first opportunity to test the effectiveness of the repairs and learned that the repairs made were unsuccessful. As a result of COVID-19, Enbridge is unable to get a troubleshooting team assembled from parts and equipment vendors to reinspect the work done and troubleshoot the engine's operation. This will cause Enbridge to be unable to conduct the quarterly emission test of 12003 within the first quarter.

Enbridge is continuing to troubleshoot the repairs conducted on the engine as personnel and equipment become available and Enbridge will not operate the engine once successful repairs are made until a proper stack test on the engine can be conducted.

Enbridge is seeking to notify the TCEQ that the required compliance test for this operating quarter will not occur as originally planned due to delays in people, equipment, and parts as a result of the extraordinary measures we and our business partners are making to limit the transmission of COVID-19.

David Laurie

Sr. ENVIRONMENTAL ADVISOR SER
ENBRIDGE
TEL: 713-627-5169 | CELL: 713-330-9358
5400 Westheimer Court, Houston, TX 77056

enbridge.com

Integrity. Safety. Respect.