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Via Email [roland.gorschboth@maryland.gov](mailto:roland.gorschboth@maryland.gov)

April 6, 2021

Roland Gorschboth

Compliance Engineer, Air Quality Planning Program, Air and Radiation

1800 Washington Boulevard

Baltimore, MD 21230

Re: TC Energy - Rutledge Compressor Station  
Blowdown Notification Plan – Revision 04062021

Mr. Gorschboth:

Attached is the revised Blowdown Notification Plan based on feedback received from MDE.

On October 23, 2020, the Maryland Department of the Environment (MDE) adopted new regulations under the Code of Maryland Title 26, Subtitle 11, Chapter 41 (COMAR 26.11.41) for the Control of Methane Emissions from the Natural Gas Industry. The new regulations became effective on November 16, 2020. COMAR 26.11.41 establishes blowdown notification and reporting requirements for existing, new, modified, or reconstructed natural gas compressor stations, natural gas underground storage facilities, and liquefied natural gas facilities.

The MDE 26.11.41 requirements are designed to provide adequate public awareness and documentation around the occurrence of blowdowns. This is accomplished through advanced notification to the public of blowdown events in excess of 1,000,000 standard cubic feet (scf). [COMAR 26.11.41.07(B)]

Operators subject to COMAR 26.11.41 are required to prepare a Blowdown Notification Plan describing the procedures for contacting the MDE, local authorities, and interested parties. [COMAR 26.11.41.07(B)]. This document serves to satisfy the blowdown notification requirements of COMAR 26.11.41.07(B) for the Rutledge Compressor Station (Station), owned and operated by TC Energy Corporation (TC Energy).

Should you have any questions or require additional information, you may contact me at (832) 320-5895 or [mili\\_patel@transcanada.com](mailto:mili_patel@transcanada.com).

Sincerely,

A handwritten signature in blue ink, appearing to be the initials "M" followed by a stylized flourish.

Mili R. Patel

Air Compliance Analyst 4

[www.tcenergy.com](http://www.tcenergy.com)



# Blowdown Notification Plan – Rutledge Compressor Station

Rutledge Compressor Station – Hartford, MD

4/6/21

Project No.: 0553829

<b>Document details</b>	The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.
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Version	Revision	Author	Reviewed by	ERM approval to issue		Comments
				Name	Date	
Draft	0.0	Michael Dearing	Colin McGroarty	Colin McGroarty	02.08.2021	Draft

## CONTENTS

<b>1.</b>	<b>INTRODUCTION AND OBJECTIVES .....</b>	<b>2</b>
<b>2.</b>	<b>APPLICABILITY AND AFFECTED TC ENERGY OPERATIONS.....</b>	<b>2</b>
2.1	Regulatory Definition .....	2
2.2	Affected TC Energy Compressor Station - Rutledge.....	2
<b>3.</b>	<b>BLOWDOWN NOTIFCATION AND PROCEDURES .....</b>	<b>3</b>
3.1	Notification Process.....	3
3.2	Public Outreach Plan.....	3
3.3	Responsible Personnel .....	3
3.4	Site Map .....	3

### List of Appendices

#### APPENDIX A SITE MAP

## 1. INTRODUCTION AND OBJECTIVES

On October 23, 2020, the Maryland Department of the Environment (MDE) adopted new regulations under the Code of Maryland Title 26, Subtitle 11, Chapter 41 (COMAR 26.11.41) for the Control of Methane Emissions from the Natural Gas Industry. The new regulations became effective on November 16, 2020. COMAR 26.11.41 establishes blowdown notification and reporting requirements for existing, new, modified, or reconstructed natural gas compressor stations, natural gas underground storage facilities, and liquefied natural gas facilities.

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## 2. APPLICABILITY AND AFFECTED TC ENERGY OPERATIONS

The sections below outline the regulatory definitions and the applicability of the TC Energy Rutledge Compressor Station.

### 2.1 Regulatory Definition

“Affected facilities” means any one of the following facilities: Cove Point Liquefied Natural Gas Facility; Myersville Natural Gas Compressor Station; Accident Natural Gas Compressor Station and Storage; Rutledge Natural Gas Compressor Station; Ellicott City Natural Gas Compressor Station; and Any new, modified, or reconstructed natural gas compressor station, natural gas underground storage.

“Blowdown” means the release of pressurized natural gas from a station, equipment, or pipelines into the atmosphere conducted with the intent to lower the pressure in a vessel or pipeline. Blowdown does not include pneumatic emissions, fugitive component emissions, or compressor seal leakage.

“Natural gas compressor station” means all equipment and components located within a facility fence line associated with moving natural gas from production fields or natural gas processing plants through natural gas transmission pipelines, or within natural gas storage fields.

### 2.2 Affected TC Energy Compressor Station - Rutledge

The TC Energy Rutledge Compressor Station is an existing natural gas compressor station subject to the provisions of COMAR 26.11.41; therefore, the facility is subject to the blowdown notification requirements of COMAR 26.11.41.07(B).

### 3. BLOWDOWN NOTIFICATION AND PROCEDURES

Within 90 days of the effective date of this regulation, affected facilities are required to submit a Blowdown Notification Plan to the MDE for approval. The Blowdown Notification Plan, as outlined in COMAR 26.11.41.07(B)(1), shall include the information listed in COMAR 26.11.41.07(B)(2)(a)-(d). Sections 3.1 through 3.4 below document TC Energy's proposed notification procedures.

#### 3.1 Notification Process

For scheduled blowdowns conducted at the site that are greater than 1,000,000 standard cubic feet, TC Energy will notify MDE via email or phone call at least 7 days prior to the event and will post the required information on its public website for interested parties. Any notifications that take place less than 7 days prior to the event will be coordinated as soon as practical. TC Energy will contact the appropriate local authorities (via phone call) and neighbors within 1/2 mile of the compressor station via an annual mailer that includes how information related to blowdowns can be accessed.

For unplanned or emergency events, TC Energy will contact MDE within one hour of the event and make the information available on the public website as soon as feasible. If notification within one hour is not feasible due to safety reasons, TC Energy will notify the MDE and post on the public website as soon as feasible with an explanation for the blowdown and why a prior notice was not possible.

#### 3.2 Public Outreach Plan

TC Energy intends to notify MDE via email or phone call. Interested parties will be given two options to be able to stay informed of blowdowns greater than 1,000,000 standard cubic feet.

- A notice will be posted in the The Aegis – Harford County (Baltimore Sun) with information on how interested parties can access blowdown information via the company's website and sign up for email notifications for instances when information related blowdowns greater than 1,000,000 standard cubic feet is uploaded on the website.
- Interested parties within a ½ mile radius will be sent mailers with information on how to obtain blowdown information on the company's website and sign up for email notifications for instances when information related blowdowns greater than 1,000,000 standard cubic feet is uploaded on the website.

#### 3.3 Responsible Personnel

The Air Compliance Team, Environmental Coordinator, Station Operator and M&R Technician are the TC Energy personnel that have been identified as the responsible personnel for blowdown notification management at the Rutledge Compressor Station.

##### **Rutledge Compressor Station General Contact Information**

2220 Rutledge Road

Fallston, MD 21047

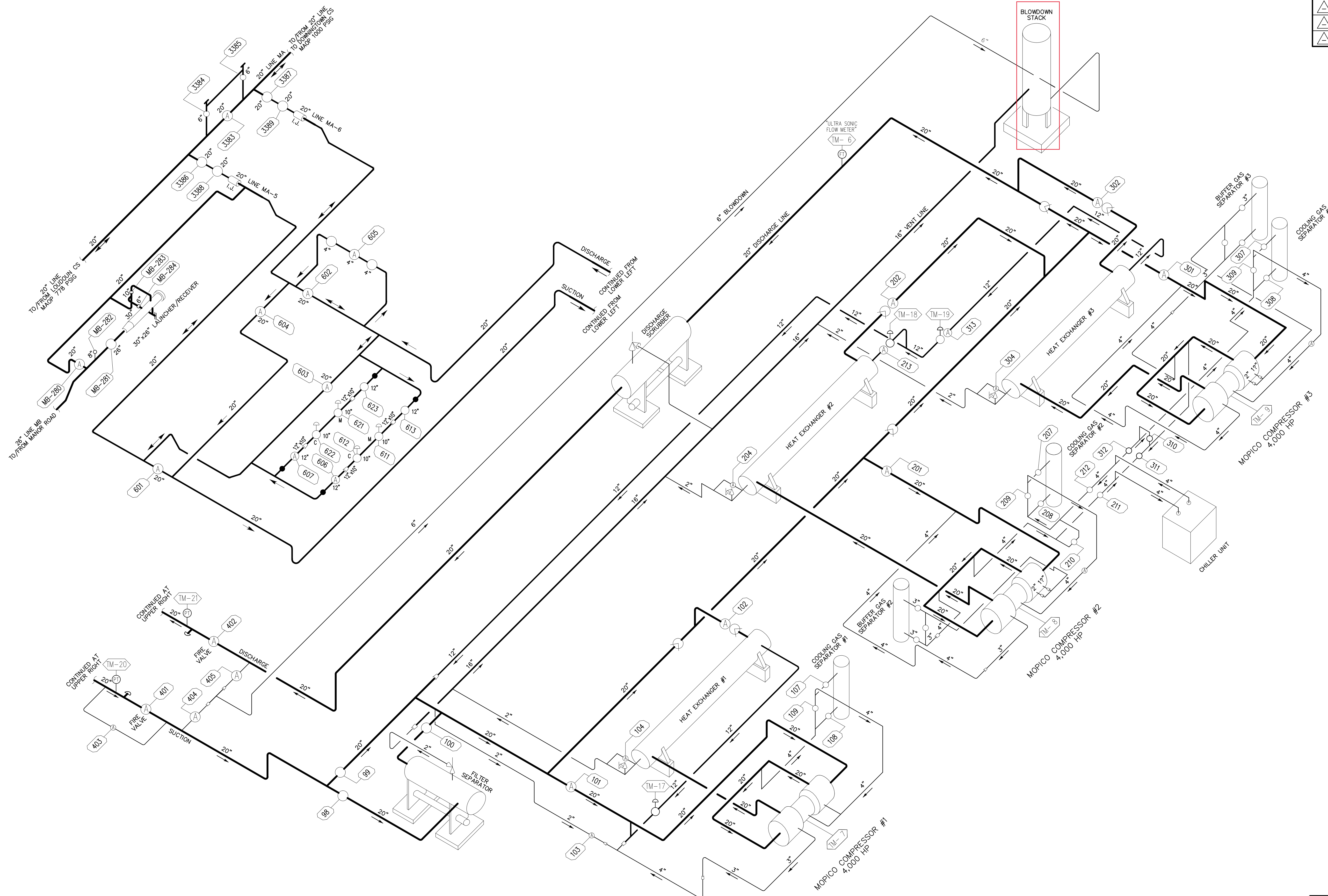
410-557-9433

#### 3.4 Site Map

TC Energy has provided a site map for the Rutledge Facility, included as Appendix A. The site map includes identification of the blowdown vent stack. Blowdown events in excess of 1,000,000 scf will be realized at the blowdown vent stack.

**APPENDIX A – SITE MAP**

NO.	REVISIONS		BY	DATE
	AS-BUILT PER PROJECTS 15233, 18235 AND 20680	PLA	PLA	10/12/15
△	REMOVED CHECK VALVE #406	PLA	PLA	10/29/15
△				
△				
△				
△				
△				



**TELEMETERING INDEX**

- TM-6 DAILY FLOW RATE MMCFD
- TM-7 UNIT 1 PERCENT SPEED
- TM-8 UNIT 2 PERCENT SPEED
- TM-9 UNIT 3 PERCENT SPEED
- TM-17 UNIT 1 RECYCLE VALVE % OPEN
- TM-18 UNIT 2 RECYCLE VALVE % OPEN
- TM-19 UNIT 3 RECYCLE VALVE % OPEN
- TM-20 SUCTION PRESSURE
- TM-21 DISCHARGE PRESSURE

**LEGEND**

- SAFETY RELIEF VALVE
- FENCE
- BLOW OFF
- CHECK VALVE
- CONTROL VALVE
- CONTROL REGULATOR
- MONITOR REGULATOR
- TELEMETERING
- VALVE
- VALVE W/ACTUATOR
- FOREIGN FACILITIES
- TCO FACILITIES
- ORIFICE METER
- TURBINE METER
- ROTARY METER
- DIAPHRAGM METER
- ULTRASONIC METER
- EMERGENCY SHUTDOWN

INVENTORY MAP: 4376 N / 372 E  
**ASSET GROUP 13**  
 MAXIMO LOCATION NUMBER: CS-6C3320

FLOC# 27488

PROJECT DELIVERY PROJECT ENGINEERING P.O. BOX 1273 CHARLESTON, WV 25325-1273 1700 MACCORMACK AVENUE SE, CHARLESTON, WV 25314		
RUTLEDGE COMPRESSOR STATION		
TITLE OPERATING DRAWING MARSHALL DISTRICT, #4 HARTFORD COUNTY, MD		
DRAWN BY:	DATE:	DRAWING NUMBER
PROJECT NUMBER:	06/30/15	FD-C181-OPDWG
W.O. NUMBER:		1



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