

Steckman Ridge, LP
890 Winter Street, Suite 300
Waltham, MA 02451



October 2, 2009

Michael Ruddeck
Air Quality Program
Altoona District Office
Pennsylvania Department of Environmental Protection
3001 Fairway Drive
Altoona, PA 16602

RECEIVED

OCT 5 - 2009

DEP - ALTOONA OFFICE

**RE: Notice of Violation Response
Plan Approval 05-03019A
Steckman Ridge Compressor Station**

Dear Mr. Ruddeck:

In response to the notice of violation letter dated September 16, 2009, Steckman Ridge, LP is providing the following information on the subject incident, response activities and corrective action measures.

As you know, on August 23, 2009 at approximately 2:00 pm, Steckman Ridge, LP experienced an emergency shutdown (ESD) at its compressor station at 1809 Rock Hill Church Road in Clearville, PA. The ESD occurred due to a detected gas leak associated with a cracked pipe fitting. As part of the shutdown process there was a venting of the natural gas within the facility to atmosphere. We estimated that 967,000 standard cubic feet of natural gas were released during this event. Following the ESD process, it was discovered that oil had atomized and dispersed out of the ESD release stack. We believe the release consisted of compressor oil used in the station. Subsequent analytical tests confirmed the liquid was "typical of various motor and lubricating oils." Copies of the analytical reports are enclosed as well as Material Safety Data Sheets (MSDS) for the two types of lubricating oil used at the facility. Upon discovery of the oil release, our initial visual observations indicated that the oil was contained on the station property and cleanup activities were initiated.

The incident was not reported immediately to the DEP as per Section C, Condition #007 (a) since at that time, we were not aware of any offsite impacts from the oil release and thus did not believe the release posed an imminent danger to public health, safety, welfare and the environment as outlined in the Plan Approval.

On Tuesday, August 25, we were notified by the PA DEP that a neighboring property owner had reported oily droplets on their property. We immediately began canvassing the area to determine if there were other impacted properties. In addition, an analysis of the plume dispersal pattern was conducted by Trinity Consultants to confirm the area of potential impacts. A copy of the plume analysis report is enclosed.

Following the release, stained soil from the compressor station property was collected for disposal. Booms were placed around ditches in the area to prevent any runoff during a rain event on Friday, August 28. We contracted with a third party environmental response company to assist in offsite cleanup efforts at those properties determine to have been impacted, including two homes and several vehicles. Waste generated in the clean up was collected and properly disposed. We replaced or provided compensation for items that were impacted by the oil mist including outdoor equipment, toys, hay, etc.

As part of the canvassing effort, we visited a pond located at 2493 Rock Hill Church Road on Wednesday, August 26. At that time, no sheen was observed in the pond. On Friday, August 28, we visited the pond again and discovered a sheen. We reported the impacts to the pond to the PA DEP that day. We placed booms in the pond to collect the oil and checked the pond condition daily thereafter until all evidence of a sheen had been eliminated. We do not believe any oily water from the pond passed the

overflow. Subsequent sample analyses indicate the pond is now free of oil. In addition to the pond, we sampled the drinking water at 2321 Rock Hill Church Road on three occasions. Sample results indicate the water well was not impacted by the release. The drinking water samples have been provided to the homeowner. Please see the enclosed analytical reports. Based on a review of oil usage at the compressor station, we estimated that approximately 20 gallons of oil was released during the ESD event.

In response to this event, we have been working to minimize the potential for a recurrence of an ESD and the chance for oil to be entrained in any gas releases. Prior to returning the facility to operation after the August 23rd event, the following steps were taken:

1. Implemented a Local Area Shut Down process in addition to the existing Emergency Shutdown process. The local shutdown will isolate and blow down only the compressor unit and adjacent unit piping upon gas detector and fire detector indications. Previously these detector indications would activate a complete station ESD, blowing down the entire station.
2. Drained low points to minimize the amount of oil in the station piping. In addition, the existing separator is being manually drained daily,
3. Eliminated non-critical activities in the station and station yard to minimize the risk of an inadvertent ESD of the station.
4. Reduced the lubrication rate for the compressors.
5. Staffed the station 24 hours a day to closely monitor station operations until permanent low point drains are installed and proven effective.

We are undertaking additional measures to ensure a permanent correction has been achieved. These steps will include:

1. Installing additional low point drains on station piping to provide additional points to remove oil from the piping. These drains will be added to the daily draining schedule to remove lubricating oil buildup in the lines. We anticipate the installation of these additional drains will be accomplished by November 1.
2. Evaluating possible modifications to the existing separator and/or installation of an additional filter separation to aid in removal of liquids from the gas stream.

In addition to the above, we have implemented a new reporting procedure for any future emergency shutdowns to address malfunction reporting issues. The procedure requires immediate reporting to PA DEP by telephone of all emergency shutdown gas releases, regardless of any associated oil release. A written report of such instances of malfunctions will be submitted to PA DEP within three days of the incident. Planned activations of the ESD system and other planned venting, which are included in the emission limits of the Plan Approval, are not affected by this revised procedure. Station personnel have also been instructed to immediately begin a canvass of the area around the station following an ESD to determine offsite impacts, if any.

At this time, we believe we have effectively remediated the impacts of the released oil on any affected soil or water bodies. In addition, we have implemented technical improvements and enhanced procedures to reduce the potential for future occurrences of this type of incident. Please contact me at 617-560-1453 if you would like any additional information regarding these activities.

Sincerely,



Karen Rankin
Environmental Manager, Northeast Region

Attachments
Via overnight mail