



## **Filing Receipt**

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# **Nelson Gardens Energy, LLC (“NGE”)**

**225 Greenfield Parkway, Suite 202**

**Liverpool, New York 13088**

## **Emergency Operations Plan (“EOP”)**

**NGE Gas-to-Energy Facility located at the Nelson Gardens Landfill**

**8963 Nelson Road, Building 5**

**San Antonio, Texas 78252**

**Submitted to**

**PUCT**

**Initial Filing**

**as of June 20, 2023**

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## **1. Executive Summary**

### **a. Contents and Policies Contained in the Emergency Operations Plan (“EOP”)**

This EOP applies to NGE Gas-to-Energy Facility located at the Nelson Gardens Landfill having its principal facilities at 8963 Nelson Road, Building 5, San Antonio, Texas 78252.

Since the NGE plant at the Nelson Gardens Landfill is a biomass-fueled 4.24 MW facility, emergency operations of the plant are not as extensive as they would be for a larger facility.

The NGE plant is operated under a Management Agreement with Greenfield Energy, LLC (“Greenfield”).

#### **i. Contents**

The contents include an Approval and Implementation Section, a Communication Plan, Procedures for Emergency Communications, Emergency Supply Plan, Emergency Staffing Response and Manner of Identifying Weather-Related Hazards.

#### **ii. Policies**

A policy statement for each of the immediately above items is contained in the EOP in Section 4 Policies.

### **b. Reference to Specific Sections and Page Numbers of this EOP that Correspond with the Requirements of the applicable PUCT Rule(s)**

Due to the size of the facility, the statements in this EOP all correspond with the requirements of the PUCT Rule in Section 25.5.3.

### **c. Record of Distribution**

The Record of Distribution is shown in the following table.

| EOP Version     | EOP Version Date | Distribution Parties | How Distributed       |
|-----------------|------------------|----------------------|-----------------------|
| Initial Version | June 20, 2023    | PUCT                 | PUC Interchange Filer |
| Revision 1      |                  |                      |                       |
| Revision 2      |                  |                      |                       |

**d. Affidavit Required Under PUCT Paragraph (4)(C)**

W. Gary Craig, Member of NGE and one of its highest-ranking officers, having binding authority, hereby affirms the following:

(i) relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent that any deviations are appropriate as a result of specific circumstances during the course of an emergency;

(ii) the EOP has been reviewed and approved by the appropriate NGE executives;

(iii) beginning with the 2023-2024 winter season, drills will be conducted to the extent required by PUCT or NGE Polices.

(iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed;

(v) NGE maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and

(vi) NGE's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training as it pertains to the NGE facility.



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W. Gary Craig, Member  
Nelson Gardens Energy, LLC

June 20, 2023

Date

## **2. Approval and Implementation**

### **a. EOP Introduction and its Applicability**

This EOP applies to NGE Gas-to-Energy Facility located at the Nelson Gardens Landfill having its principal facilities at 8963 Nelson Road, Building 5, San Antonio, Texas 78252.

This EOP addresses the operational functions of this generation facility during cold or hot weather emergencies, extreme wind events and extreme precipitation events.

Since this small generation facility is not an electric utility, is not a transmission and distribution facility, is not municipally owned nor is it an electric cooperative, most of PUCT Subchapter C (e) does not apply to this facility.

### **b. Individuals Responsible**

W. Gary Craig, a member of NGE, is responsible for maintaining and implementing the EOP and is the only person authorized to change the EOP.

Thomas R. Kennedy, a member of NGE and Steve Stavlo, the Chief Operator, provide support to Mr. Craig by making recommendations for changes in the EOP when such become necessary.

### **c. Revision Control Summary**

The Revision Control Summary is contained in the following table that lists the date of each change made to the EOP since its initial filing.

| Revision Number | Date of Revision | Changes Made              |
|-----------------|------------------|---------------------------|
| Initial         | June 20, 2023    | None for the initial EOP. |
| 1               |                  |                           |
| 2               |                  |                           |

### **d. Dated Statement of Current EOP**

This EOP, dated June 20, 2023, is the most recently approved EOP for the NGE facility.

**e. Date the EOP was Most Recently Approved by the Entity**

The EOP dated June 20, 2023 is the EOP most recently approved by NGE.

**f. Plan to Maintain Pre-identified Supplies for Emergency Response**

This small generating facility relies upon methane gas created within the City of San Antonio ("CoSA") owned Nelson Gardens Landfill for its fuel. There are no fuel storage facilities at the site except for within the landfill biomass deposits and its gas collection extraction wells and collection piping system.

Other identified supplies necessary to maintain operations during emergencies or any other times include glycol coolant fluid, lubricating oil, CPS Energy electrical power and spare parts.

**i. Glycol Coolant Supplies**

The generating facility's four JGS 320 GS-L.L reciprocating engines are cooled by a glycol coolant system including the engines, remote radiators and piping in between each. Sufficient supplies of glycol coolant are maintained on site to replenish coolant used, if any, during operations. A double-wall UL42 tank is used to hold the facility's primary supply of glycol coolant. At times, additional glycol coolant might be held on site in totes specifically made for that purpose. Emergency operations should not increase the amount of this fluid needed for operation.

**ii. Lubricating Oil**

Double-wall UL42 on site tanks hold fresh lubricating oil sufficient for operational make up purposes and for oil changes when those become necessary. Emergency operations should not increase the amount of this fluid needed for operation.

**iii. Waste Fluids**

Waste fluids consisting of spent glycol coolant and lubricating oil removed during oil changes are retained on site in a separate UL42 double-wall tank so that no removal of spent fluids would be required in an emergency response.

**iv. Electric Power**

At all operating times, the facility must have functional electrical power connection with CPS Energy since the facility control systems will not

permit generation operations unless or until the control systems automatically sense that CPS Energy interconnect circuits are active (on-line) and of matching characteristics with that required by the generators.

**v. Spare Parts**

The NGE facility maintains stocks of spare parts delivered by INNIO (successor to Jenbacher) under a Material Stream Agreement that supplies spare parts to the site according to an operating hour schedule developed by Jenbacher, the engine manufacturer.

**g. Staffing Plan During Emergency Response**

This small generating facility is automated and does not depend upon the presence of operating staff for operations. The generation facility is above local 100 year flood levels, but access to the site during significant precipitation events has been adversely affected in the past. As a policy, NGE does not require that the operating staff travel through hazardous conditions to reach the facility. If staff is already on site when the hazardous conditions commence, the policy recommends that operating staff stay at the facility until hazardous traveling conditions have subsided.

**h. How NGE Identifies Weather-Related Hazards**

This small facility does not have any on site weather forecasting facilities, but rather relies upon the available local broadcast and social media to identify the likelihood of weather-related hazards occurring as well as the intensity and time frame of forecasts for those hazards.

**3. Drills**

NGE requires that its operator, Greenfield, conduct drills at the time of performing each of the ERCOT Summer and Winter weatherization assessments. The drills will test the facility's readiness for glycol and lubricating oil availability and for guy cable readiness. Operator will notify commission staff using the method and form described by that staff on the commission's web site and the appropriate TDEM district coordinators by email or other written form at least 30 days prior to the date of each drill.

**4. Policies**

NGE policies specifically related to this EOP follow:

**a. Glycol Coolant and Lubricating Oil Policy**



The facility operator will maintain fresh (unused) quantities of both glycol coolant and lubricating oil sufficient to maintain current levels of facility operation during an emergency event when normal delivery of these fluids could be delayed.

**b. Waste Coolant and Lubricating Oil Policy**

The facility operator will maintain sufficient storage volume in the waste fluid tank or in supplementing storage containers in the event that waste pickup is delayed during an emergency event. At a minimum, storage volume will be checked during each drill.

**c. Emergency Event Staffing Policy**

The facility operator will not require operating staff to remain on site during emergency events nor will the facility operator require its staff to travel to the facility during any governmental travel restrictions or any period of unsafe vehicular travel. Note: The facility does not have any living accommodations or water source that would permit site occupancy to maintain operation during an emergency event. NGE's expectation is that operation, whether manually attended or automatically controlled, will not be possible due to the dependence upon the CPS Energy circuits serving the facility being active (live).

**d. Emergency Travel Routes**

NGE will require Greenfield to plan out, to the extent feasible, driving routes for its operations personnel that are known to be passable during extreme precipitation events.

**e. Exhaust Stack Stability**

As soon as possible after any extreme wind event, the operator will check the stability of the facility's cable-guyed exhaust stacks to verify that each are in operating condition. If any engine's exhaust stack has been compromised by the wind event, the engine connected to the exhaust stack should not be started until the observed exhaust stack deficiency has been corrected.

**5. Reporting**

If requested by commission staff during an activation of the State Operation Center by TDEM, NGE's operator will provide updates on the status of operations, outages and restoration efforts. However, readers of this EOP should be reminded that the facility cannot operate whenever the CPS Energy electric lines serving the facility are not active.