HOPEWELL COGENERATION FACILITY
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GDF SUEZ

Appendix 13.

Non-Conformance Register

This is a snapshot example of the Non-Conformance Register. The Register is updated as non-conformances are completed and is reviewed monthly as part of HCF's monthly status report to corporate headquarters. As areas, such as audits are complete, they are dropped off the list to make this a continual record. Because of these changes, the example used for this appendix is just that an example and not to be considered an up-to-date copy.

Hopewell Cogeneration Facility Environmental and S[illegible]y Audit Inspection Discrepancies and Actions Taken.

International Power GDF SUEZ

2010 Report Report

Date of this Report: 26-Feb-11

Inspection Date and Affiliation	Finding Number	Finding Type	Media	Regulatory Citation	Action Level (1-3)	Discrepancies	Person or Persons Responsible for corrective action, Timetable were applicable.	Action Taken / Status/Remarks	Cost in Man-hours or Money	Projected Completion Date	Date Completed
PCB Source Ltr. August 10, 2009	N/A		Waste Water		2	State may require additional waste Water Testing	Chuck Barnes and Mike Wargo	Do PCB Testing in 2010 or 2011, We have a contractor to do the work and should start testing in the winter.	$7000 to $12000 and 20 Man-hours	8/10/2011	
Annual Safety Audit 3/29/2010	2010-11	Reg	Emergency Action Plan	29 CFR 1910.37(b)	1	(Exit Routes) Lighting and marking must be adequate and appropriate. Sign Illumination and clearly marked routes of egress were not adequate. Schematics were not clear to exit routs and absent in some locations. Perform review of all exit marking and signs which identify a clear path of exit from each building.	Enrique Toro	IN PROGRESS Add illuminated exit signs where needed, and update exit routes . The signs are in progress and all the exit route signs have been updated.		5/31/2011	
Suez RCF survey requirement to have outside source survey the plant	N/A		Insulation	Suez Directive	2	Do a complete survey for RCF. Set up a program and plan in case there is any on site. Have an outside company do a survey.	Jeff Huise	An out side company has been contacted and money purposed for 2011 budget. The survey will be conducted in 2011. The MSDS program will be modified to reflect the survey. This has been placed in the budget for 2011.	$25000 and 250 man-hours	12/31/2011	
May 26, 2010 Fire Rescue conducted a Confined Space Rescue analysis of the plant.	N/A	BMP	Rescue from a Confined Space		2	Need to have hooks and pad-eyes welded into the HRSG's so a person can be hooked and lowered.	Steve Henry	Will have to be done during outages.		5/15/2011	
DEQ Air Inspection Dec 9, 2010	N/A					No Discrepancies					12/9/2010
EHS Audit on February 2-3, 2011	N/A	EHS	EHS Report	N/A	2	The fuel consumption values (natural gas and diesel) used for the report were related only to the fuel consumed by the turbines and boilers, not the total fuel used by the site. Additionally, the formula used to convert MMbtu into MWh was not pertinent. It did not take in account the conversion factor "1 GWh = 3412 MMBtu".	Chuck Barnes	Proper Conversion factor has been substituted into the formulas. A new data sheet has been constructed and the procedure for filling out the report has been updated to reflect the changes	1 Man-hour	2/25/2011	2/9/2011
	N/A	EHS	EHS Report	N/A	2	There was a discrepancy in the conversion of oil gallons to MMBtu. The factor used (gallons per MMBtu LHV) was 7.5158 (7.14/0.95). It should be 7.8125 (1000/128), or 7.42 when considering HHV (replacing 7.14).	Chuck Barnes	Proper Conversion factor has been substituted into the formulas. A new data sheet has been constructed and the procedure for filling out the report has been updated to reflect the changes	0.5 Man-hour	2/25/2011	2/9/2011
	N/A	EHS	EHS Report	N/A	2	Industrial water consumption should be equal the total water consumption minus cooling water consumption. The value reported for industrial water was of the sum of total water (double count of cooling water).	Chuck Barnes	The water consumption has been divided into the cooling tower water and the remainder of the plant (process) water. A new data sheet has been constructed and the procedure for filling out the report has been updated to reflect the changes	1.5 Man-hour	2/25/2011	2/9/2011

Inspection Dat and Affiliation	ding nber	Finding Type	Media	Regulatory Citation	Action Level (1-3)	Discrepancies	Person or Persons Responsible for cc e action, Timetable were applicable.	Action Taken / Status/Remarks	Cost in Man-hours or Money	Projected Complet Date	Date Completed
	N/A	EHS	EHS Report	N/A	2	Used oil (3,918 lbs) was not included in recovered value reported. Used oil is sold to a company that re-uses it (verified by observing invoices). Additionally, the recycled material total reported less used oil was 12,108 lbs but inadvertently excluded cardboard - actual recycled material total with cardboard was 14,976 lbs.	Chuck Barnes	The Waste Oil has been added to the other recycle material and the quarry in the database has been checked to make sure cardboard is included in the pounds/tons reported.	3.5 Man-hour	2/25/2011	2/10/2011
	N/A	EHS	EHS Report	N/A	2	*Lubricant oil waste* (used oil) is considered by the site as non-hazardous. According to the US EPA (Identification and Listing of Hazardous Waste), used oil containing more than 1000 ppm's total halogens is presumed to be a hazardous waste. This situation should be checked (verification of oil characteristics).	Chuck Barnes	this is not a discrepancy, but more like a BMP. The Auditor ask the question after they had left. Checks are being made o the oil but the process is a color change; once the process is complete a picture is taken and stored in the waste program. Picture is being sent to the auditor.	0.25 Man-hours	2/25/2011	2/12/2011
	N/A	EHS	EHS Report	N/A	2	Report: Calculated automatically by CERIS based on the fuel consumption data. Value reported: 235 411t CO2, Value observed: 587 516,06 t CO2. Conclusion: Even considering a slight increase in fuel consumption in 2010 and the same emission factors as in 2009, the value reported on CERIS for FY10 shows a significant decrease compared to 2009 (Data reported in FY09: 276 MWh of oil fuel, 1892 MWh of natural gas and 453542,4 tCO2).	Chuck Barnes	The factors used for CO2 natural gas is 53.02 kg/mmbtu and for #2 Diesel is 73.96 kg/mmbtu.These conversion factors come from the US EPA for Green House Gas reporting. In addition there are a few other gases that have to be added, but they are not significant. I do not believe that HCF is in the wrong on CO2 Reporting.	2 man-hours	2/25/2011	2/12/2011
	N/A	EHS	EHS Report	N/A	2	Industrial water should be equal the total water consumption minus cooling water. The value reported for industrial water was the same of total water (cooling water included).	Chuck Barnes	The term total water was misunderstood for water used in the plant for only process and steam injection. The cooling water has been subtracted and the procedure rewritten. Using the "Industrial Water Consumption" the blowdowns have also been subtracted from the use. The blowdowns are considered significant.	1.5 Man-hour	2/25/2011	2/12/2011

Number of Inspections held:	**6**
In the last number of months:	**19**
Out of this many discrepancies:	**12**
Number of discrepancies remaining:	**4**
Percent of completion:	**66.7%**

Note: As the number of inspections increases continue to insert rows as needed.
Note: This form was started in March of 2004 as the Non-Conformance Register, the discrepancies do not have to come from audits, it can be from suggestions or any other environmental or safety checks.

Finding Types: R = Regulatory, P = Policy, BMP = Best Management Practices, ISO = EMS requirements, EHS = EHS Audit findings

Media: Air, EPCRA, Housekeeping, Hazardous Waste, Non-Haz Waste, Plans/Procedures, Reporting, SPCC/Oil, Stormwater, Water/Wastewater, or Miscellaneous.

Levels: 1. Immediate Action Required
2. Priority Action Required
3. Action Required
0. Is an item /inspection with no discrepancies

Note: Due to updates to SAP-10 (Environmental) some new columns have been added, some will remain blank until old inspection items have been taken care of .

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