

May 13, 2020

Mr. Ken Tut Project Representative Nutrien Ltd. - SCC Post Office Box 300 White Springs, Florida 32096-0300

RE:

2020 LEAK SURVEY RESULTS

Dear Mr. Tut:

Enclosed for your files, are two [2] copies of the 2020 Leak Survey performed beginning May 5, 2020, for the Nutrien Ltd. Swift Creek Chemicals facility. No Grade I leaks, Grade II leaks or Grade III leaks were detected during this survey. Florida Public Service Commission guidelines require that:

- Grade I Leaks Zero [0] Grade I leaks were detected during this survey. These leaks require prompt action to protect life and property and continuous action until the conditions are no longer hazardous.
- Grade II Leaks Zero [0] Grade II leaks were detected during this survey. These leaks must be repaired or cleared within one calendar year, but not to exceed 15 months from the date the leak was reported. Grade II leaks should be re-evaluated at least once every six months until cleared. The frequency of re-evaluation should be determined by the location and magnitude of the leakage condition since these leaks vary greatly in degree of potential hazard.
- Grade III Leaks Zero [0] Grade III surface leaks were detected during this survey. These leaks should be repaired or re-evaluated during the next scheduled survey, or within 15 months of the date reported, whichever occurs first, until the leak is re-graded or no longer results in a reading.

Once the repairs are completed and the gas has had an opportunity to dissipate, a re-check of each leak repair is required. A gas detector instrument must be used for the re-check and date of re-check recorded, but no later than 6 months. I trust the enclosed report to be satisfactory and in sufficient detail, however, should you need additional information, please contact me.

Sincerely,

W. L. Hays

CITY SERVICES, Inc.

W. L. Hays



Email & cityservicesinc@gmail.com

### NUTRIEN LTD. **SWIFT CREEK CHEMICALS**

### GAS LEAKAGE SURVEY **MAY 2020**

Nutrien Ltd.
Swift Creek Chemicals
Post Office Box 300
White Springs, Florida 32096-0300
ATTN: Mr. Ken Tut
Project Representative

### ANNUAL NATURAL GAS LEAK SURVEY

A natural gas leakage survey was conducted for Nutrien Ltd., Swift Creek Chemicals, White Springs, Florida during the month of May 2020. An area including the entire gas distribution system, as represented by management, was surveyed for natural gas leaks.

There were no Grade I leaks, Grade II leaks or Grade III leaks detected during this survey. No leaks were detected on the following facilities:

METER - 0 REGULATOR - 0 RISER - 0 CUT OFF - 0

SERVICE - 0 SERVICE TAP - 0 VALVE - 0 MAIN - 0

Any leak detected will be classified according to the criteria on the following pages.

### Leak Classifications - Grade |

### **DEFINITION:**

Grade I leaks represent an existing or probable hazard to persons or property, and requires immediate repair or continuous action until the conditions are no longer hazardous.

### **ACTION CRITERIA:**

Grade I leaks require prompt action to protect life and property, and continuous action until the conditions are no longer hazardous. The prompt action in some instances may require one or more of the following:

- Implementation of Company Emergency Plan (§192.615)
- Evacuating premises
- · Blocking off an area
- Rerouting traffic
- Eliminating Sources of ignition
- Venting the area
- · Notifying police and fire departments
- Stopping the flow of gas by closing valves or other means

### **EXAMPLES:**

- 1. Any leak which in the judgement of the operating personnel at the scene, is regarded as an immediate hazard.
- 2. Escaping gas that has ignited.
- 3. Any indication of gas which has migrated into or under a building, or into a tunnel.
- 4. Any reading at the outside wall of a building, or where gas would likely migrate to an outside wall of a building.
- 5. Any reading of 80% LEL, or greater, in a confined space.
- 6. Any reading of 80% LEL, or greater in small substructures (other than gas associated substructures) from which gas would likely migrate to the outside wall of a building.
- 7. Any leak that can be seen, heard or felt, and which is in a location that may endanger the general public or property.
- 8. Once repairs are completed and the gas has an opportunity to dissipate, a recheck of each leak repair is required. A gas detector instrument must be used for the re-check and date of re-check recorded, but no later than 6 months.

### Leak Classifications – Grade II

### **DEFINITION:**

Grade II leaks are not a threat to persons or property at the time of detection, but justifies scheduled repair based on potential future hazard.

### **ACTION CRITERIA:**

Grade II leaks shall be repaired within 90 days from the date the leak was originally located, unless due to re-survey the leak was determined to be Grade 3 as defined in Leak Classifications – Grade III. In determining the time period for repair, the following criteria should be taken into consideration:

- · Amount and migration of gas;
- Proximity of gas to buildings and subsurface structures;
- Extent of pavement;
- Soil type and conditions, such as moisture and natural venting.

Grade II leaks may vary greatly in degree of potential hazard. Some Grade II leaks, when evaluated by the above criteria, may justify scheduled repair within the next Five [5] working days, while others will justify repair within Thirty [30] days. During the working day on which the leak is discovered, these situations should be brought to the attention of the individual responsible for scheduling leak repair.

Once the repairs are completed and the gas has had an opportunity to dissipate, a re-check of each leak repair is required. A gas detector instrument must be used for the re-check and date of re -check recorded, but no later than 6 months.

### Leak Classifications - Grade II - Continued

### **EXAMPLES:**

Grade II leaks requiring action ahead of ground freezing or other adverse changes in venting conditions, such as any leak which, under frozen or other adverse soil conditions, would likely migrate to the outside wall of a building.

Leaks requiring action within Three [3] months include, but are not limited to:

- Any reading of 40% LEL, or greater under a sidewalk in a wall to wall paved area that has significant gas migration and does not qualify as a Grade I leak.
- Any reading of 100% LEL, or greater, under a street in a wall to wall paved area that has significant gas migration and does not qualify as a Grade I leak.
- Any reading less than 80% LEL in small substructures (other than gas associated substructures) from which gas would likely migrate creating a probable future hazard.
- Any reading between 20% LEL and 80% LEL in a confined space.
- Any reading on a pipeline operating at 30% SMYS, or greater, in a class Three [3] or Four [4] location, which does not qualify as a Grade I leak.
- Any reading of 80% LEL, or greater, in gas associated substructures.
- Any leak which, in the judgment of operating personnel at the scene, is of sufficient magnitude to justify scheduled repair.

### Leak Classifications - Grade III

### **DEFINITION:**

Grade III leaks are non-hazardous at the time of detection and can be reasonably expected to remain non-hazardous.

### **ACTION CRITERIA:**

Above ground Grade III leaks shall be repaired within Ninety [90] days from the date the leak was originally located unless the leak is upgraded or does not produce a positive leak indication when a soap and water solution, or its equivalent, is applied on suspected locations at operating pressure. Grade III leaks that are underground shall be re-evaluated at least once every Six [6] months until repaired. The frequency of re-evaluation shall be determined by the location and magnitude of the leak.

Grade III leaks should be re-evaluated during the next scheduled survey, or within Six [6] months of the date reported, whichever occurs first, until the leak is re-graded or no longer results in a reading.

### **EXAMPLES:**

Leaks requiring re-evaluation at periodic intervals include, but are not limited to:

- Any reading of less than 80% LEL in small gas associated substructures.
- Any reading under a street in areas without wall to wall paving where it is unlikely the gas could migrate to the outside wall of a building.
- Any reading of less than 20% LEL in a confined space.



City Services, Inc.

### LEAK SURVEY FINAL REPORT

Purchase Order Number: 2116	058202				
Customer: Nutrien		Location: W	/hite Springs, FL	(SCC)	
Date Survey Started: May 5, 20	20	Date Survey	Completed: Ma	ay 5, 2020	
Total Number of Survey Days:	One (1)	Total Number	er of Survey Ho	u <b>rs:</b> Eight	(8)
Type of Gas: Natural ⊠ Othe	er 🔲	Type of Sur	vey: Walking Ele	ectronic De	tection
Miles of Mains Inspected: .5		Services Ins	pected: 1 R	tisers: 1	
Number and Grade of Surface I	eaks Located:	(1) _0_	(2) _0	(3) 0	_ Total <u>0</u>
Number and Grade of Sub-Surf	ace Leaks Located:	(1) <u>0</u>	(2) _0_	(3) _0_	_ Total <u>0</u>
Area of Survey: Commercial 🖂	Residential [	School 🗌	Public Buildings	s 🗌 Tr	ansmission
Type of Survey: Electronic ⊠	Soap Test 🗌	Probe Bar 🗌	Othe	er 🗌 _	
Parts of System Checked:	Transmission	Mains 🖂	Service	s 🛚	Meter Sets
Type of System: Cast Iron	Steel ⊠	Plastic 🗌	Coppe	r 🗌	Other 🗌
Soil Types: Clay	Loam ⊠	Sand $oxtimes$	Roc	k 🗌	
Soil Conditions: Wet	Dry 🗌	Normal 🖂			
Weather Conditions: Rain	] Wind $\square$	Ice 🗌	Norma	al 🛛	
Customer Provided: Trans	portation   Guid	de 🗌 💮 Mar	os 🛛 Other 🗆		
City Services Provided: Trans	portation 🗵 🛚 Equip	oment: Bascom-	Turner Gas Rove	er 🛛	
Additional Comments:					
Location and identification inform	ation on Commercial	addresses are w	ritten to the best	of my kno	wledge as no guid
was provided for this survey.	<u>.</u>			<u> </u>	
Mitchell Chatfall Mitch Whitfield		<u> </u>			



## DAILY-WEEKLY LEAKAGE SURVEY REPORT

AREA OF SURVEY		DOWNTOWN	RESIDENTIAL	RIGHT OF WAY	SCHOOLS	PUBLIC BUILDINGS	отнея		PART OF SYSTEM		MAINS	SERVICES	METERSETS	TRANSMISSIONS	FUEL LINES	ОТНЕК	 TYPE OF SURVEY	VEGETATION	FLAME IONIZATION	BUBBLE TEST	PROBE BAR	ELECTRONIC DETECTION
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	TOTAL	0	_															_				0
LEAKS	≡	0																				0
LE,	=	0																				0
	_	0																				0
CASES		0																				0
RISERS		1																				1
NO. OF	SEKVICES	1	-		:																	-
MAIN		0.5																				0.5
TYPE	SURVEY	Е																				Ш
PART OF SYSTEM	COVERED	M, S		_				-		:												M, S
AREA OF	SURVEY	3																				3
CHARGEABLE		8																				8
DATE		5-May																				1
CITY OR TOWN		White Springs, FL	Nutrien (SCC)														:					TOTAL

### TECHNICIAN: Mitch Whitfield

# CITY SERVICES, INC. - SURFACE LEAK DETECTION REPORT

# OF SERVICES 1		LEAKS	P Positive	N Negative	R Remarks	ATMOSPHERIC		Mild	3 Moderate	4 Heavy	MATERIALS	P Plastic	B Bare Steel	C Coated Steel	X X-Trude Steel	SIZE	1   1" or Less	2 Over 1" Thru 2"	3 Over 2" Thru 4"	4 Over 4" Thru 8"	5 Over 8"	X Other
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May 5, 2020	Σ	ပ																				
Σ	AC	1																				
_ DATE_																						
Nutrien (SCC)	REMARKS																					
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DISTRICT	METER NO.	RISER		:																		
White Springs, FL	ADDRESS	Chemical Plant																				
CUSTOMER		์ 5													!	_						

Whitfield
Mitchell
CHNICIAN
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GUIDE None

Grade III Leaks Grade II Leaks

Risers

0 -

Grade I Leaks

0 0

User Task Status Report City Services, Inc. (CSI)

Whitfield, Mitch

Bobby Boyd 3/26/2018

Run by: Run on:

TASK NAME 0141 - Visual Inspection For Atmospheric Corrosion	mospheric Corrosion			STATUS Qualified
		Evaluation	Expiration	J
Qualification Type	Evaluations	Date	Date	Verified
ENERGY worldnet, Inc Performance	EWN-PE-Visual Inspection of Atmospheric Coating (7.1, 0141) - 2646	2/20/2018	2/20/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Insufficient Cathodic Protection - 2212	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-Atmospheric Corrosion (7.1, 0141) - 2223	2/16/2018	2/16/2021	EV
0151 - Visual Inspection of Buried	ied Pipe and Components When Exposed Eva	osed	Expiration	Qualified
Qualification Type	Evaluations	Date	Date	Verified
ENERGY worldnet, Inc Performance	EWN-PE-Inspect for External Corrosion on Buried or Submerged Pipe (5.2) - 2643	2/20/2018	2/20/2021	EV
ENERGY worldnet, Inc Performance	EWN-PE-Inspect the Condition of External Coating on Buried or Submerged Pipe (5.3, 0151) - 2644	2/20/2018	2/20/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV

ENERGY worldnet, Inc Written	EWN-CBT-AOC Inoperability of a Pipeline Component - 2211	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-Corrosion Control Fundamentals (5.3, 9.2, 1021, 0031, 0091) - 2355	1/25/2018	1/25/2021	EV
0161 - Visual Inspection for Inte	ternal Corrosion	Evaluation	Expiration	Qualified
Qualification Type	Evaluations	Date	Date	Verified
ENERGY worldnet, Inc Performance	EWN-PE-Inspect Internal Pipe Surfaces (12, 0161) - 2370	2/20/2018	2/20/2021	Ä
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	Ä
ENERGY worldnet, Inc Written	EWN-CBT-AOC Internal Corrosion (12) - 2213	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-WE-Inspect Internal Pipe Surface (12) - 2685	1/25/2018	1/25/2021	Ä
0191 - Measure Atmospheric Corrosion	rosion		1 1 1 1 1	Qualified
Qualification Type	Evaluations	Evaluation Date	expiration Date	Verified
ENERGY worldnet, Inc Performance	EWN-PE-Measure Corroded Area (8.3, 0191) - 2582	2/20/2018	2/20/2021	E
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	E
ENERGY worldnet, Inc Written	EWN-CBT-AOC Insufficient Cathodic Protection - 2212	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-Corrosion Control Fundamentals (5.3, 9.2, 1021, 0031, 0091) - 2355	1/25/2018	1/25/2021	E
0201 - Visual Inspection of Insta Qualification Type	0201 - Visual Inspection of Installed Pipe and Components for Mechanical Damage Evaluation Qualification Type Evaluations Date	nanical Damage Evaluation Date	Expiration Date	Qualified Verified

ENERGY worldnet, Inc Performance	EWN-PE-Inspect for Physical Damage on Buried or Submerged pipe (0211) - 2642	2/20/2018	2/20/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Inoperability of a Pipeline Component - 2211	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-WE-AOC Pipeline Damage (L) - 2753	1/29/2018	1/29/2021	EV
ENERGY worldnet, Inc Written	EWN-WE-Inspect for Physical Damage on Buried or Submerged Pipe (5.1) - 8695	1/25/2018	1/25/2021	EV
0211 - Measure and Characteriz	ize Mechanical Damage on Installed Pipe and Components Evaluation Exp	Pipe and Compo Evaluation	nents Expiration	Qualified
Qualification Type	Evaluations	Date	Date	Verified
ENERGY worldnet, Inc Performance	EWN-PE-Inspect for Physical Damage on Buried or Submerged pipe (0211) - 2642	2/20/2018	2/20/2021	E
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-WE-AOC Pipeline Damage (L) - 2753	1/29/2018	1/29/2021	EV
ENERGY worldnet, Inc Written	EWN-WE-Inspect for Physical Damage on Buried or Submerged Pipe (5.1) - 8695	1/25/2018	1/25/2021	EV
0591 - Leak Test at Operating P	Pressure	notion of	Foritation	Qualified
Qualification Type	Evaluations	Date	Date	Verified
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Report of Gas Odor/Liquid Release - 2216	1/24/2018	1/24/2021	E

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Qualified

Qualification Type	Evaluations	Evaluation Date	Expiration Date	Verified
ENERGY worldnet, Inc Performance	EWN-PE-Prepare Surface for Coating Using Hand and Power Tools (13.1) - 2543	2/7/2018	2/7/2021	E
ENERGY worldnet, Inc Performance	EWN-PE-Apply Atmospheric Coating Using Hand Application Methods (7.5) - 2580	1/25/2018	1/25/2021	E
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Insufficient Cathodic Protection - 2212	1/24/2018	1/24/2021	E
ENERGY worldnet, Inc Written	EWN-CBT-Atmospheric Corrosion (7.1, 0141) - 2223	2/16/2018	2/16/2021	F
ENERGY worldnet, Inc Written	Coating on Buried or Submerged Pipe (13) - 2665	2/23/2018	2/23/2021	E
ENERGY worldnet, Inc Written	EWN-WE-Apply Atmospheric Coating Using Hand Application Methods (7.5) - 8723	2/23/2018	2/23/2021	EV
1241 - Outside Gas Leak Investigation	gation	Evaluation	Evniration	Verified
Qualification Type	Evaluations	Date	Date	ΕV
ENERGY worldnet, Inc Performance	EWN-PE-Leak Survey (1241, 1261) - 2283	2/20/2018	2/20/2021	EV
ENERGY worldnet, Inc Performance	EWN-PE-Perform/Observe Leak Survey/Patrol - 2455	2/20/2018	2/20/2021	E
ENERGY worldnet, Inc Written	Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written ENERGY worldnet, Inc Written	EWN-CBT-AOC Flammable Gas Atmosphere - 2209 EWN-CBT-AOC Report of Gas	1/24/2018 1/24/2018	1/24/2021 1/24/2021	EV EV

## Odor/Liquid Release - 2216

ENERGY worldnet, Inc Written	EWN-CBT-Leak Survey and Patrols (52.1, 52.2, 1241, 1261) - 2282	2/23/2018	2/23/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-Reporting Field Gas Leaks - 2325	2/23/2018	2/23/2021	Qualified
1261 - Walking Gas Leakage Su	irvey	Evaluation	Expiration	Verified
Qualification Type	Evaluations	Date	Date	EV
ENERGY worldnet, Inc Performance	EWN-PE-Leak Survey (1241, 1261) - 2283	1/25/2018	1/25/2021	EV
ENERGY worldnet, Inc Written	EWN-CBI-AUC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Flammable Gas Atmosphere - 2209	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-Leak Survey and Patrols (52.1, 52.2, 1241, 1261) - 2282	2/23/2018	2/23/2021	Qualified
1291 - Locate Underground Pipe	elines	Evaluation	Expiration	Verified
Qualification Type		Date	Date	E
ENERGY worldnet, Inc Performance	EWN-PE-Locate Line (14.1, 1291) - 2548	1/25/2018	1/25/2021	A
ENERGY worldnet, Inc Performance	EWN-PE-Reporting Protocols (15.2, 1311) - 2553	1/25/2018	1/25/2021	EV
ENERGY worldnet, Inc Performance	EWN-PE-Use of Probing Equipment (16.1) - 2554	1/25/2018	1/25/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Failure to Follow Procedures - 2207	1/24/2018	1/24/2021	EV
ENERGY worldnet, Inc Written	EWN-CBT-AOC Report of Gas Odor/Liquid Release - 2216	1/24/2018	1/24/2021	F
ENERGY worldnet, Inc Written	EWIN-WE-LOCALE PIPEIIITE (14.1) - 2688	2/23/2018	1/24/2021	Qualified



### Last Calibration Data by Unit

Friday, May 15, 2020 8:26:17 AM Page 1 of 1

[] Exit Report

Unit ID

1

1524-403568

Date Calibrated: 5/3/2020

User:

Model Number:

Serial Number:

VGI-201

Time Calibrated (HH:MM): 18:31:00

Block Check OK(Y/N): Y

Sensor	Calibration Gas	Before Calibration	After Calibration	Sensitivity	OK (Y/N)
LEL	50% LEL	50	50	1577	Υ
со	100 PPM				
GAS	Air / Cal Gas	100	100	877	Υ
GAS	System Gas	100	100	3895	Υ
OXYGEN	Air				
H2S	H2S				
PPM GAS	50% LEL			1092	Υ

### CITY SERVICES, INC. 2019 Drug Test Statistical Summary

City Services, Inc. Post Office Box 3217 Thomasville, Georgia 31799 Contact Person: Jerry Allen Title: Office Manager Telephone: (229) 226-6569

Total Number of Employees in Organization:		6	
Number of Employees in Test Pool:	Full Time:	5	
	Temporary:	0	
	Part Time:	0	
	Others:	0	

Summarized is the number of test, number of employees tested, and positive results for each category listed.

Type of Test	<u>Draws</u>	<u>Tested</u>	Positive Results	Positive For:
Pre-Employment: Random: Reasonable Cause: Post-Accident Post-Rehab	0 4 0 0	0 3 0 0	0 0 0 0	N/A N/A N/A N/A N/A

DOT drug tests are conducted only using urine specimens. The urine specimens are analyzed for the following drugs/metabolites:

- Marijuana metabolites/THC
- Cocaine metabolites
- Amphetamines
- Phencyclidine (PCP)
- Opioid Metabolites (i.e., codeine, 6-AM (heroin), morphine)
- Also, four Semi-Synthetic Opioids (i.e., oxycodone, oxymorphone, hydrocodone, hydromorphone)

### Indicate positive results by number as follows:

Marijuana-1, Cocaine-2, Amphetamines-3, Phencyclidine-4, Opioid Metabolites-5, Semi-Synthetic Opioids - 6

### Indicate test by number as follows:

Random-1, Post Accident-2, Reasonable Cause-3, Post-Rehab-4, Pre-employment-5

Age	<u>Sex</u>	<u>Test</u>	Substance Found	
<del></del>				
		<del></del>		
Report Prepared By: Jerry Allen Period Covered: 1/1/2019 – 12/31/2019		Date Submitted: 5/13/2020 Distributed To: Nutrien Ltd., White Springs, Florida		