

COVID-19-Emergency Request to Temporarily Suspend
Regulatory Requirements and/or Permit Conditions

In accordance with Governor Wolf’s Proclamation of Disaster Emergency of March 6, 2020 and the Governor’s powers pursuant to the Emergency Management Code, 35 Pa.C.S. §7301, the Governor has authority to suspend regulatory obligations and other legal obligations within his jurisdiction where strict compliance will prevent, hinder, or delay necessary action in coping with the COVID-19 emergency.

*If you are requesting suspension of a Federal requirement, under only Federal authority, please contact US EPA Region III and refer to the US EPA March 26, 2020 Memorandum (COVID-19 Implications for EPA’s Enforcement and Compliance Assurance Program). To the extent the request relates to a federal program delegated to Pennsylvania, Pennsylvania will review requests submitted in this format.

Submit completed and signed requests to the email resource account:

RA-EPCOVID19SuspReq@pa.gov

All questions must be completed; if not applicable, type “N/A”.

Background
<p>A. Identify the Regulated Entity or Permittee, including an address for the location of the permitted or regulated activity (if no address, DEP Permit No. can be used), business mailing address, and a point of contact for this request with email and phone number.</p> <p>Lathrop Compressor Station 4685 State Road 29 Springville, PA 18844 Air Permit: AG5-58-00017A</p> <p>Williams Field Services Company, LLC c/o Amy Jacoby 310 SR 29 North Tunkhannock PA 18657 amy.jacoby@williams.com 570-209-1390</p>
<p>B. Describe what permitted or regulated activity you are engaged in.</p> <p>The facility provides compression and dehydration for natural gas gathering from nearby wells.</p>
<p>C. If you were issued a permit by DEP for the permitted or regulated activity described above, identify the type of permit and permit number. Please list the DEP Office, Conservation District, Oil and Gas District Office, or District Mining Office that issued the permit or authorization.</p> <p>Air Permit AG5-58-00017A was authorized by the Northeast Regional Office. The permit is a General Plan Approval And/Or General Operating Permit BAQ-GPA/GP-5.</p>

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- D. Identify what regulatory requirement(s) or permit condition(s) or other requirement(s) you seek a temporary suspension of. Please cite the specific regulatory requirement(s), condition(s) and/or other requirement(s).

GP-5, Section C, Condition 1 (d)(v) - Performance Test of source ID: 109 - generator engine which is >100 - <500 hp engine that is to be tested within 180 days of reauthorization. The generator engine is a backup power source and is used when purchase power is not available.

Reasons for Requested Suspension

For each regulatory requirement or permit condition or requirement listed above, please state clearly why you are seeking the temporary suspension, addressing at least the following in detail:

- A. How will strict compliance with the subject requirement(s) prevent, hinder, or delay necessary action in coping with the COVID-19 emergency? Be as specific as possible.

This facility is an essential business and protection of the operational workforce is paramount to ensuring the safe and reliable delivery of natural gas. Williams is making all efforts to ensure the safety of our employees, contractors, and members of the Department, while maintaining regulatory compliance.

In this effort, Williams has adopted numerous safety measures and detailed procedures intended to protect this workforce including minimizing the number of contractors on site, and developing "bubble plans" to help minimize the risk of spread of COVID-19 between qualified Williams personnel. These safety measures have resulted in delays for certain means of demonstrating compliance.

Emissions testing will be completed by a third-party contractor. The third-parties work closely with our Operations and support teams to ensure testing is performed properly and safely. This often results in groups of people working in close proximity to one another while testing being conducted. Minimizing these interactions is essential to protecting our work force.

- B. How has COVID-19 restricted your ability to comply with the environmental regulatory requirement, permit condition or other requirements for which you are seeking a suspension?

Procurement of a necessary engine part has been delayed due to COVID 19. The manufacturer informed Williams that the factory is awaiting materials from their vendor. The vendor is delayed due to the COVID 19 pandemic which has resulted in decreased work capacity and slow shipments.

While performing maintenance, operations found an issue affecting the engine and ordered parts through the engine manufacturer. Emission testing that was initially scheduled for April 8, 2020 was postponed and rescheduled for April 29, 2020. The

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manufacturer shortly thereafter informed Williams that there was a three to four week delay in shipping a necessary engine part. Testing was rescheduled for May 26, 2020. The manufacturer notified Williams on May 19, 2020 that the factory is not expecting to be able to ship the necessary engine part until May 28, 2020 due to the decreased work capacity and slow shipments resulting from COVID 19. Emission testing that was scheduled for May 26, 2020 is tentatively being rescheduled for June 5, 2020. If the part doesn't arrive by June 5, the generator will not be able to be tested within 180 days of the GP5 reauthorization.

- C. What other aspects or parts of your operation(s) are being shut down or are not functioning due to the COVID-19 restrictions? And, are you requesting any suspensions or waiver(s) from other government agencies? If so, from what agencies and for what requirements?

Williams has suspended activities within our facilities on all but essential projects. At this time, Williams does not expect to request any additional extensions or waivers.

- D. What alternate compliance options have you explored to address the issues or environmental compliance hurdles with which you are confronted?

The manufacturer has tried to find alike parts but there was none available.

- E. Do you believe cost gouging or supply hoarding is negatively effecting your ability to comply? If so, please explain and provide cost information and/or availability information from your supply chain history.

N/A

- F. How long do you expect to be unable to comply with the regulatory requirement(s), permit condition(s) or other requirement and identify what circumstances must exist for you to return to compliance. Specify the period of time for which you are requesting the suspension. Suspensions will not be issued initially beyond June 30, 2020.

The vendor is currently anticipating shipping the parts on May 28, 2020. A suspension until June 30, 2020 should be suffieicent time to allow Williams to procure the necessary part and conduct maintenane and testing even in the event that the vendor experiences further delays.

- G. If applicable, identify how you will account for all reporting obligations for the period of noncompliance.

Williams will take appropriate measures to ensure reporting obligations are met. Any deviations will be reported to the Department in accordance with the GP-5 permit and malfunction reporting guidelines.

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Evaluate Risk to Public Health and the Environment
<p>A. Will the temporary suspension, if granted, result in an increase in the risk of additional pollution (e.g. increased emissions, increased concentrations of any pollutant and/or releases of new or more pollutants) and/or will it result in less monitoring, reporting, and/or supervision of pollution incidents, accidents or equipment failures?</p> <p>The temporary suspension will not result in an increase in additional pollution. The generator is a backup power source and is in service only when purchased power is not available.</p>
<p>(i) If yes, please identify what pollutants and the nature of the risk.</p> <p>N/A</p>
<p>(ii) If yes, please identify the potential extent of increased pollution, including any increases in risk to human health, safety or the environment.</p> <p>N/A</p>
<p>(iii) If no, explain how increased pollution will be avoided.</p> <p>The generator is a backup power source and is in service only when purchased power is not available.</p>
<p>B. What public health and/or safety benefits will result if the temporary suspension is granted?</p> <p>By granting a temporary suspension, Williams and its vendors will be able to continue decreased work capacity to help prevent the spread of the COVID-19.</p>
<p>C. Is the restriction on your ability to comply generally applicable to others engaged in your industrial classification or industry? If no, please explain why your situation is unique.</p> <p>Yes. A delay in the procurement of parts would be generally applicable.</p>
<p>D. Would you possess a unique advantage over your competitors, or others in the same industry, if a suspension is granted?</p> <p>There would not be an advantage over our competitors.</p>

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E. What would be the negative consequences to your operation if the temporary suspension is not granted? What would be the negative consequences to the Commonwealth's response to the COVID-19 emergency if your requested temporary suspension is not granted?

Williams does not anticipate an increase in emissions or expect a negative impact to the environment as a result of this request.

A refusal to grant the relief requested could result in possible exposure of Coronavirus to vendors and qualified operational personnel, and could result in impacts to the safe and reliable delivery of natural gas into the market place.

CERTIFICATION

Pursuant to the prohibition against unsworn falsification to authorities, 18 Pa.C.S.A. §4904, I am an authorized representative of the requestor and have personal knowledge of the facts set forth in this temporary suspension request.

I hereby certify that the information provided herein is true and accurate.



Signature and title of Certifier

Jack Walsh - Vice President, Susquehanna River Supply Hub

Print Name and Title

Note: This form will not be accepted without a written signature. Electronic signatures are not accepted.

Submit completed and signed requests to the email resource account:

RA-EPCOVID19SuspReq@pa.gov