

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. East Penn Transfer Station, 4687 Hanoverville Road Bethlehem, PA 18020 Yvonne Plakotaris, 610-759-6398 x5</p>
<p>B. Describe what permitted or regulated activity you are engaged in. Solid Waste Transfer Station</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. Solid Waste Transfer Station permit #101358</p>
<p>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). 279.272</p>

Reasons for Requested Suspension
<p>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:</p>
<p>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. It has the potential to include gatherings of more than 10 people and to expose both the attendant and the attendees to the covid</p>

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

Print Name and Title

Yvonne Plakofaris General Manager

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

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

<p>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? East Penn operates the drop off recycling center with an attendant in a location required by our Host Municipality and the space does not allow for social distancing or frequent disinfecting.</p>
<p>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? Our main office is shut down to public access. We are not requesting any other suspensions from any other government agencies.</p>
<p>D. What alternate compliance options have you explored to address the issues or environmental compliance hurdles with which you are confronted? We explored the possibility of a non attendant drop off recycling facility. However, the inability to monitor the inbound materials has the potential for large contamination rates.</p>
<p>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. No</p>
<p>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. Through the third quarter of 2020</p>
<p>G. If applicable, identify how you will account for all reporting obligations for the period of noncompliance. There is no volume inbound so no reporting beyond the weighed inbound</p>

<p>Evaluate Risk to Public Health and the Environment</p>
<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? No</p>

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

(i) If yes, please identify what pollutants and the nature of the risk.
(ii) If yes, please identify the potential extent of increased pollution, including any increases in risk to human health, safety or the environment.
(iii) If no, explain how increased pollution will be avoided.
<p>B. What public health and/or safety benefits will result if the temporary suspension is granted? Less potential for the transmission of the Covid virus to a predominately senior population</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. Yes</p>
<p>D. Would you possess a unique advantage over your competitors, or others in the same industry, if a suspension is granted? No</p>
<p>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? There would be the potential for a greater transmission of Covid-19 to our essential employees</p>

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

[Handwritten Signature]
For East Penn Sanitation
 General Manager

From: [Yvonne Plakotaris](#)
To: [EP, COVID-19 Suspension Request](#)
Subject: [External] RE: TSR-180_Platokaris_East Penn Transfer Station
Date: Monday, June 8, 2020 2:17:32 PM

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

Hi, Here are the clarification you requested:

The Northeast Regional DEP office in Wilkes-Barre issued our solid waste permit.

The permittee is East Penn Transfer Station operated by East Penn Sanitation Inc.

Thank You for your consideration of using our 35 year old local, family owned and operated PennDEP permitted, ISO 14001-2015 certified waste hauling company.

Yvonne Plakotaris

General Manager
East Penn Sanitation, Inc.
610-759-6398 x5

We are an ISO 14001:2015 certified company.

The information contained in this email message is intended only for the personal and confidential use of the designated recipient named above. If the reader of this email message is not the intended recipient, you should not further disseminate, distribute, or copy this message. If you have received this communication in error, please notify me immediately by reply email or telephone at (610) 759-6398. Thank you.



Please consider the environment before printing this email

From: EP, COVID-19 Suspension Request [mailto:RA-EPCOVID19SUSPREQ@pa.gov]
Sent: Monday, June 08, 2020 1:33 PM
To: Yvonne Plakotaris <yvonnep@eastpennsanitation.com>
Cc: EP, COVID-19 Suspension Request <RA-EPCOVID19SUSPREQ@pa.gov>
Subject: TSR-180_Platokaris_East Penn Transfer Station

Greetings,

Thank you for sending your form for Temporary Suspension Request to the Department of Environmental Protection.

It appears that one answer on this form is incomplete. Question C on the first page asks for the DEP office that issued your permit. Please provide this information. Also, in your answer to Question A on the first page, is East Penn Transfer Station the permittee, or is the permittee another entity that operates the transfer station? Please ensure the permittee's name is listed.

Thank you for your patience and your cooperation.

Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street | Harrisburg, PA 17101
RA-EPCCOVID19SuspReq@pa.gov
www.dep.pa.gov

From: Yvonne Plakotaris <yvonnep@eastpennsanitation.com>
Sent: Monday, June 8, 2020 10:43 AM
To: EP, COVID-19 Suspension Request <RA-EPCCOVID19SUSPREQ@pa.gov>
Subject: [External] FW: Temporary Suspension Request

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

From: Yvonne Plakotaris
Sent: Monday, June 08, 2020 10:30 AM
To: RA_EPCCOVID19SuspReq@pa.gov
Subject: Temporary Suspension Request

Kindly consider our request for temporary suspension of the recycling drop off service required by our solid waste permit. The site logistics prevent us from managing the flow of people and traffic.

Thank You, Yvonne Plakotaris General Manager East Penn Sanitation Inc.