

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>UniTech Services Group 138 Longmeadow Street Suite 202 Longmeadow, MA 01106-1155</p>	<p>DEP Note Location of use: 401 North Third Avenue Royersford, PA 19468</p>
<p>B. Describe what permitted or regulated activity you are engaged in. For the collection, laundering, and decontamination of contaminated clothing and other launderable through non-apparel items; for the collection and treatment of single use contaminated clothing and non-apparel items used in conjunction with the protective clothing program; for the collection and decontamination of respirators and other such non-launderable, non-apparel items used in conjunction with a protective clothing program; for the collection and decontamination of tools and materials only by decontamination techniques described in the renewal application dated December 21, 2015; for the possession of contaminated equipment in the licensee’s portable laundry unit; and for the pre-receipt security inspection of vehicles and containers en route to nuclear power plant sites.</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. Radioactive Materials License Nos. PA-1073 and PA-1556 DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF RADIATION PROTECTION</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).
UniTech is making this notification regarding personnel in-vivo bioassays (chest counting), discussed in Appendix D, Section II.B., of our license application.

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.
UniTech has determined that compliance with our commitment to conduct chest counts of employees presents more significant risks to personnel than benefit.

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?
Compliance with social distancing guidelines is not possible during the performance of this task.

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?
N/A

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

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.
UniTech would like suspension of the regulatory requirement until June 30,2020. We expect to return to the regular performance of chest counts as soon as social distancing policies have been relaxed or removed.

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

Evaluate Risk to Public Health and the Environment

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?
N/A

(i) If yes, please identify what pollutants and the nature of the risk.
N/A

(ii) If yes, please identify the potential extent of increased pollution, including any increases in risk to human health, safety or the environment.
N/A

(iii) If no, explain how increased pollution will be avoided.
N/A

B. What public health and/or safety benefits will result if the temporary suspension is granted?
UniTech employees and the public at large will be less susceptible to contact and spread the Coronavirus.

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 - for those that would have similar procedures

D. Would you possess a unique advantage over your competitors, or others in the same industry, if a suspension is granted?
No

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?
The negative consequences to operation if the temporary suspension is not granted is employees will be at a greater risk of contracting COVID-19. The negative

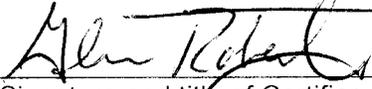
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consequences to the Commonwealth's responded to the COVID-19 emergency if the requested temporary suspension is not granted is residents within the Commonwealth are at a greater risk contracting COVID-19, which could lead to a rise in infection rates.

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

Director of Health Physics and Engineering

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:
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