

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>Miller Compressor Station 363 Miller Road New Milford, PA 18834 Air Permit: AG5-58-00014A</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 AG5-58-00014A was authorized by the Northeast Regional Office. The permit is a General Plan Approval And/Or General Operating Permit BAQ-GPA/GP-5.</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).</p> <p>GP-5, Section J, Condition 1 (a) - Performance Test</p>

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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. Since the development of the 2018 GP5, clarification has been requested of requirements placed on existing sources. To date this has not been resolved.

On April 9, 2020 a request for extension was submitted to DEP. Williams requested that the Department grant a time extension for completing emissions testing on thermal oxidizers installed at various facilities throughout the Commonwealth. Regional contacts within DEP have directed Williams to utilize this form to complete the request.

The extension request was submitted because applicability of the requirements of GP5 Section J to existing sources is unclear. Other sections of the 2018 GP5 permit exempt or grandfather equipment based on its original installation date. Section J neither expressly exempts equipment based on installation date nor mentions express applicability to existing equipment. Additionally, the existing thermal oxidizers at these facilities do not control sources subject to either referenced Subpart (OOOO or OOOOa).

Williams has contacted the manufacturers of the thermal oxidizers for information documenting compliance with NSPS OOOO/OOOOa performance requirements. Information is available for similar models, but not for the unit installed.

Williams has submitted a protocol to complete testing on a thermal oxidizer at the one of it's compressor stations (Rattlesnake Hill CS) in Susquehanna County. Williams has requested use of this protocol as amended for it's other sources within Susquehanna County. The protocol is under review.

However, it is Williams understanding that a minimum of six weeks has been added to this review due to impacts of COVID-19. Once approved Williams will need to schedule third party contractors to complete the work and provide a 30-day required notice to the Department.

Williams respectfully requests a time extension of 60 to 90 days from receipt of protocol approval to complete performance testing.

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 compliance.

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<p>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 between qualified Williams personnel. This has also added delays for demonstrating compliance.</p> <p>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 is completed. Minimizing these interactions is essential to protecting our work force.</p>
<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? Williams is confident that the thermal oxidizers are performing as designed.</p> <p>However, as noted above, COVID-19 has impacted our ability to conduct performance testing.</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? 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.</p>
<p>D. What alternate compliance options have you explored to address the issues or environmental compliance hurdles with which you are confronted? Williams has installed thermal oxidizers guaranteed by the manufacturer to achieve the emissions levels and destruction efficiency required by the permit. Williams also maintains these assets in conformance with manufacturer specifications to ensure that they operate as designed. In addition, as recommended by the manufacturer, Williams continues to monitor for the presence of flame and outlet temperature.</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. N/A</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. On March 3 2020, Williams submitted a testing protocol for review and approval to the Department. Williams has requested use of this protocol along with a couple of</p>

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<p>admendments. Performance testing will be conducted within 60 to 90 days of receipt of protocol approval.</p> <p>This extension request will also allow Williams to work with our contractors to ensure proper measures are in place to mitigate potential spread of Coronavirus by using appropriate measures recommended by the CDC.</p>
<p>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 malfunction reporting guidelines.</p>

Evaluate Risk to Public Health and the Environment	
A.	<p>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? Williams is confident that the thermal oxidizers are performing as designed. To verify, Williams continues to monitor for the presence of flame and outlet temperature as recommended by the manufacturer.</p> <p>Therefore, Williams strongly believes that there are no increased emissions.</p> <p>Williams staff will continue to closely monitor the equipment and respond to any incidents. Additionally, equipment will continue to be operated and maintained in accordance with manufacturer's recommended practices.</p>
(i)	<p>If yes, please identify what pollutants and the nature of the risk. N/A</p>
(ii)	<p>If yes, please identify the potential extent of increased pollution, including any increases in risk to human health, safety or the environment. N/A</p>
(iii)	<p>If no, explain how increased pollution will be avoided. N/A</p>
B.	<p>What public health and/or safety benefits will result if the temporary suspension is granted? By granting a temporary suspension, Williams will not be engaging outside personnel to travel to the area to conduct testing. This will help to mitigate exposure to Williams personnel and members of the public (hotels, service facilities, etc.)</p>

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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. These restrictions would be generally applicable.
D. Would you possess a unique advantage over your competitors, or others in the same industry, if a suspension is granted? There would not be an advantage over our competitors.
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. The relief requested would pose possible exposure to Coronavirus to qualified operational personnel, and could result in impacts to the safe and reliable delivery of natural gas into the market place. Additionally, personnel from outside of the area would be utilized to complete the required testing. By not granting the request, these personnel will be mobilized, resulting in a potential increased risk of exposure to others in the Commonwealth.

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:



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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