

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](mailto:RA-EPCOVID19SuspReq@pa.gov)

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

<b>Background</b>
<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>

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

<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>
---

<p><b>Reasons for Requested Suspension</b></p> <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.</p> <p>Testing the thermal oxidizers will require installation of stack ports to conduct performance testing. Due to COVID-19, Williams had stopped all construction at the compressor stations since the middle of March. In order to maintain adherence to the Governor's COVID-19 orders, construction activities requiring contractor travel and mobilization were suspended and Williams halted construction activities until the end of June. The compressor station is located in Susquehanna County which the Governor has currently listed as being in the yellow status. Construction is scheduled to slowly begin during the month of July by following the strict Williams and CDC protocols and compressor station bubble/distancing plans.</p> <p>Installation of the stack ports is scheduled to occur during the month of July when construction is allowed to resume at the stations. Performance testing would be scheduled shortly thereafter.</p> <p>Williams is requesting an extension until the end of August, 2020 to complete the performance testing.</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?</p> <p>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?</p>

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

Williams has suspended activities within our facilities on all but essential projects to maintain operation as an essential industry. 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?

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.

- 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.

Williams is requesting an extension until the end of August, 2020 to complete the performance testing.

Testing the thermal oxidizers will require installation of stack ports to conduct performance testing. Due to COVID-19, Williams had stopped all construction at the compressor stations since the middle of March. In order to maintain adherence to the Governor's COVID-19 orders, construction activities requiring contractor travel and mobilization were suspended and Williams halted construction activities until the end of June. Construction is scheduled to slowly begin during the month of July by following the strict Williams and CDC protocols and compressor station bubble/distancing plans.

Installation of the stack ports is scheduled to occur during the month of July when construction is allowed to resume at the stations. Performance testing would be scheduled shortly thereafter.

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

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

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.

<b>Evaluate Risk to Public Health and the Environment</b>	
<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>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>	
<p>(i) If yes, please identify what pollutants and the nature of the risk.</p>	N/A
<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>	N/A
<p>(iii) If no, explain how increased pollution will be avoided.</p>	N/A
<p>B. What public health and/or safety benefits will result if the temporary suspension is granted?</p> <p>Contractors will be required to follow Williams and CDC safety protocols and site bubble/distancing plans. This suspension will help to mitigate exposure to Williams personnel, members of the public (hotels, service facilities, etc.), and the contractor to 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>	

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

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 test ports installation and performance testing. By not granting the request, these personnel will be mobilized, resulting in a potential increased risk of exposure to others in the Commonwealth.

<p><b><u>CERTIFICATION</u></b></p> <p>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.</p> <p>I hereby certify that the information provided herein is true and accurate.</p> <p> _____ Signature and title of Certifier</p> <p><b>Jack Walsh - Vice President, Susquehanna River Supply Hub</b> _____ Print Name and Title</p>
---

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](mailto:RA-EPCOVID19SuspReq@pa.gov)