

Enclosure
CLEAN AIR ACT STATIONARY SOURCE
EXPEDITED SETTLEMENT AGREEMENT AND FINAL ORDER

DOCKET NO. CAA-10-2022-0033

Respondent: Williams Corporation, NW Pipeline LLC
P.O. Box 58900
Salt Lake City, UT
84158

1. The U.S. Environmental Protection Agency (EPA) and Williams Corporation, NW Pipeline LLC (Respondent) enter into this Clean Air Act Stationary Source Expedited Settlement Agreement (Agreement) to settle the civil violations set forth in the enclosed Clean Air Act Stationary Source Inspection Findings, Alleged Violations, and Proposed Penalty Form (the Form), pursuant to Section 113 of the Clean Air Act (CAA), 42 U.S.C. §7413, and 40 C.F.R. §22.13(b,) for a penalty of **\$23,593 (Assessed Penalty)**.
2. Respondent admits to being subject to the Clean Air Act (CAA) and its associated regulations and that EPA has jurisdiction over Respondent and Respondent's conduct described in Table 2 of the Form.
3. Respondent neither admits nor denies the violations specified in the Form, and waives any objections Respondent may have to EPA's jurisdiction.
4. Respondent certifies that it completed the required corrective actions set forth in Table 3 of the Form.
5. Respondent acknowledges that there are significant penalties for submitting false information to the United States Government, including the possibility of a fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, 42 U.S.C. §7413(c)(2), and 18 U.S.C. §§1001 and 1341.
6. Respondent agrees to pay the Assessed Penalty and agrees to submit proof of payment to EPA within 30 calendar days of receipt of a copy of the ratified Agreement and Final Order.
7. The Assessed Penalty is based upon EPA's consideration of the factors provided in CAA Section 113(e), 42 U.S.C. §7413(e), and the EPA's Clean Air Act Stationary Source Civil Penalty Policy dated October 25, 1991¹.
8. The payment made by Respondent pursuant to this Agreement is a penalty within the meaning of Section 162(f) of the Internal Revenue Code, 26 USC §162(f), and, therefore, Respondent shall not claim the payment as a tax-deductible expenditure for purposes of

¹ See "Amendments to the EPA's Civil Penalty Policy to Account for Inflation (effective January 15, 2020) and Transmittal of the 2020 Civil Monetary Penalty Inflation Adjustment Rule" January 15, 2020 memorandum; see also "2019 Civil Monetary Penalty Inflation Adjustment Rule (effective February 6, 2019) and Transmittal of the 2019 Civil Monetary Penalty Inflation Adjustment Rule" March 4, 2019 memorandum.

federal, state or local law.

9. If Respondent fails to pay the Assessed Penalty in full within 30 calendar days of receipt of a copy of the ratified Agreement and Final Order, the entire unpaid balance of the Assessed Penalty and accrued interest shall become immediately due and owing. Interest shall be at rates established pursuant to 26 U.S.C. §6621(a)(2) from the date of the Final Order. 42 U.S.C. §7413(d)(5).
10. If Respondent fails to timely pay the Assessed Penalty, Respondent may be subject to a civil action pursuant to Section 113(d)(5) of the CAA, 42 U.S.C. §7413(d)(5) to collect the Assessed Penalty. In any collection action, the validity, amount, and appropriateness of the Assessed Penalty shall not be subject to review.
11. By its first signature below, EPA confirms the alleged violation(s) set forth in Table 2 in the Form. Upon signing and returning this Agreement to EPA, Respondent consents to the terms of this Agreement without further notice.
12. Respondent acknowledges that this Agreement is binding on the parties signing below and becomes effective on the date of filing with the Hearing Clerk, after ratification of the Agreement and Final Order by Richard Mednick, Regional Judicial Officer, EPA Region 10.
13. This Agreement, upon approval and incorporation in the Final Order concludes this action pursuant to Sections 22.13(b), and 22.18(b)(2), and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Penalties and the Revocation/Termination or Suspension of Permits, 40 CFR §§22.13(b), and 22.18(b)(2), and (3).
14. This Agreement and Final Order is a complete and full resolution of Respondent's liability for federal civil penalties for the violations alleged in this Agreement.
15. The EPA reserves the right to commence action against any person, including Respondent, in response to any condition which the EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment.
16. Nothing in this Agreement and Final Order should be construed to limit the authority of the United States to pursue criminal sanctions.
17. This settlement is subject to all limitations on the scope of resolution and the reservation of rights set forth in 40 C.F.R. §22.18(c).
18. EPA reserves any rights and remedies available to it under the CAA, the regulations promulgated thereunder, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this ESA and accompanying Final Order following its filing with the Regional Hearing Clerk.
19. Nothing in this Agreement relieves Respondent's obligation to comply with all applicable provisions of the CAA, 42 U.S.C §7401 *et. seq.*, and the regulations promulgated thereunder.

20. Upon the EPA's final approval of the ESA, Respondent expressly waives its right to contest the allegations. Moreover, in entering into this Agreement, Respondent agrees to bear its own costs and attorney's fees related to this Agreement.

ACCEPT THE PROPOSED PENALTY

I/we (Respondent) consent to the proposed penalty.

DECLINE THE PROPOSED PENALTY

I/we (Respondent) decline the proposed penalty. If you choose to decline this proposed penalty, you may be subject to formal enforcement action and, in that event, will have an opportunity to a hearing related to any subsequent penalty assessment.

COST OF COMPLIANCE

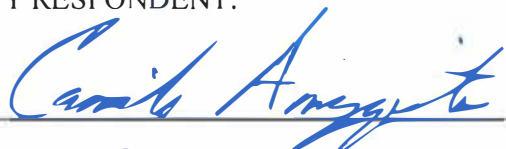
Respondent certifies that it has expended \$ 0.00 to correct the alleged violations and to come into compliance.

APPROVED BY EPA:

Signature: _____
EDWARD J KOWALSKI, Director
Enforcement and Compliance Assurance Division
EPA Region 10

Date: _____

APPROVED BY RESPONDENT:

Signature: see  _____

Date: 02/22/2022

Name and Title (print): CAMILO AMEZQUITA, VP GM NORTHWEST PIPELINE, LLC.

FINAL ORDER

Pursuant to 40 C.F.R. §22.18(b) of the EPA's Consolidated Rules of Practice and section 113 of the Clean Air Act, 42 U.S.C. §7413, and having relied upon the representations of the parties set forth in the Expedited Settlement Agreement, I have determined that the penalty assessed herein is based on a consideration of the EPA's Clean Air Act Stationary Source Civil Penalty Policy dated October 25, 1991 and the Expedited Settlement Agreement Pilot Program for the Clean Air Act Stationary Source Enforcement Program, and is consistent with the penalty assessment criteria set forth in in CAA Section 113(e), 42 U.S.C. §7413(e).

THEREFORE, the foregoing Expedited Settlement Agreement is hereby approved and incorporated by reference into the Final Order. Respondent is ORDERED, as set forth above, to pay the civil penalty.

Signature _____
RICHARD MEDNICK
Regional Judicial Officer
EPA Region 10

Date: _____

CLEAN AIR ACT STATIONARY SOURCE INSPECTION FINDINGS, ALLEGED VIOLATIONS AND PROPOSED PENALTY FORM

Table 1 - Inspection Information	
Inspection/ Report Review Date(s):	Docket Number:
4/13/2021, 4/16/2021	C A A - 1 0 - 2 0 2 2 - 0 0 3 3
Respondent Address:	Facility Name(s):
P.O. Box 58900	Williams Corporation, NW Pipeline LLC
City:	Inspector Names:
Salt Lake City	John Pavitt, Jon Klemesrud, Sara Conley
State: Zip Code:	EPA Delegated Official:
UT 84158	Edward Kowalski
Respondent Name:	EPA Attorney Contact(s):
Williams Corporation, NW Pipeline LLC	Brandon Cobb, (206) 553-6917

Table 2 - Violations				
<p>On April 13, 2021 and April 16, 2021, EPA determined that Williams Corporation, NW Pipeline LLC (“Respondent”) submitted incomplete annual and semi-annual reports. It is a violation of Section 502(a) of the Clean Air Act (CAA), 42 U.S.C § 7661a(a), to violate any requirement of a permit issued under Title V of the CAA. Respondent committed two violations of CAA Section 502(a), 42 U.S.C. § 7661a(a), by failing to submit a complete Semi-Annual Monitoring Report as required by AOP R10T5110200 Condition 3.47, and by failing to submit a complete Annual Compliance Certification as required by AOP R10T5110200 Condition 3.49. The violations are further described in the following table.</p>				
Violation Description	Permit Condition	Time Period	Document	Comments
Failure to submit complete Semi-Annual Monitoring Reports.	AOP R10T5110200 Condition 3.47	2020	Semi-Annual Monitoring Report (Dated January 18, 2021)	Respondent incorrectly reported “No Monitoring or Analysis is required for this facility.” Facility-specific monitoring is included in Section 4 of AOP R10T5110200 and Unit-specific requirements are included in Section 5 and 6 of AOP R10T5110200.
Failure to submit a	AOP R10T5110200	2020	2020 Annual	Respondent incorrectly

complete Annual Compliance Certification.	Condition 3.49		Compliance Certification (Dated January 18, 2021)	reported there are no unit-specific requirements for this facility. Methods used to determine compliance are listed as "N/A." Unit-specific requirements are included in Section 5 and 6 of AOP R10T5110200.
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Table 3 - Penalty and Required Corrective Action	
Penalty	\$23,593
Required Corrective Action	In addition to paying the monetary penalty, Respondent must resubmit the Semi-Annual and Annual Compliance Certifications for 2020 and provide the missing data.

CAA Stationary Source Expedited Settlement Agreement Instructions

To resolve the alleged violations using this Expedited Settlement Agreement (Agreement), you must complete the corrective action set forth in Table 3 of the Inspection Findings, Alleged Violations and Proposed Penalty Form (Form) within 30 calendar days of receipt of the Agreement. You must also sign and return this Agreement, as presented, within 30 calendar days of receipt of the Agreement.

If you do not sign and return this Agreement, as presented, within 30 calendar days of the date of its receipt, the Agreement is withdrawn without prejudice to EPA's ability to file an enforcement action for the violations identified in the Form.

If you decide not to sign and return the Agreement, EPA may pursue an enforcement action to correct the violation(s) and seek penalties of up to \$101,439 per day for each violation of the CAA.

Failure to return the Agreement within the approved time does not relieve you of the responsibility to comply fully with the regulations, including correction of the violations that have been identified in the Form.

If you choose to sign and return the Agreement, EPA will submit the Agreement for ratification by the designated EPA official. Upon ratification of the Agreement, EPA will send you a copy of the ratified Agreement and Final Order. **Within 30 calendar days of your receipt of the copy of the ratified Agreement and Final Order, you must pay the penalty using one of four methods described below:**

1. **Payment online using Pay.gov:** Pay online through the Department of the Treasury using credit or debit card (Visa, MasterCard, American Express & Discover), or checking account information. Navigate to www.pay.gov, enter **SFO 1.1** in the form search box on the top left side of the screen, complete SFO Form Number 1.1, and select payment type from the drop down menu. Enter the docket number listed below.
2. **Payment by Electronic Funds Transfer:**

Federal Reserve Bank of New York
ABA 021030004
Account 68010727
SWIFT address FRNYUS33
33 Liberty Street
New York, NY 10045
Beneficiary: Environmental Protection Agency

3. Payment by Automated Clearinghouse (ACH) using Vendor Express:

U.S. Treasury REX/Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22- Checking

Physical Location of the U.S. Treasury Facility:
5700 Rivertech Court
Riverdale, MD 20737

4. Payment by mail:

Regular US Postal Service via certified mail:
U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

Overnight mail (FedEx or other non-US Postal Service express mail):
U.S. Bank
1005 Convention Plaza
Mail Station SL-MO-C2GL
St. Louis, MO 6310

Regardless of payment method, be sure to reference the docket number of your Agreement and Final Order. Additional information for the payment options above is available at <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.

Within 24 hours of payment, you must provide proof of payment by email or regular mail to:

Sara Conley, Enforcement Officer
U.S. Environmental Protection Agency
Region 10, Mail Stop 20-C04
1200 Sixth Avenue, Suite 155
Seattle, WA 98101
Conley.Sara@epa.gov

Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 10, Mail Stop 11-C07
1200 Sixth Avenue, Suite 155
Seattle, WA 98101
R10_RHC@epa.gov

“Proof of payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made, being sure to include the docket number with your proof of payment.

If you have any questions or would like to request an extension, you should contact Sara Conley of the Enforcement and Compliance Assurance Division at 206-553-6914, Conley.Sara@epa.gov within 30 calendar days of receipt of the Agreement. EPA will consider whether to grant an extension on a case-by-case basis. EPA will not accept or approve any Agreement returned more than 30 calendar days after the date of your receipt of the Agreement unless an extension in writing has been granted by EPA.