

EPA Disclosure Dates	Facility Name	Description of Facility Operations	Date Facility Began Operations	Program	Reference	Description of Issue or Finding Identified	Individual Who Discovered the Violation	Corrective Action	Date Discovered	Corrective Action Due Date	Corrective Action Closed Date	Emissions reduction achieved through correction of violation	Estimated Cost of Compliance
1/9/2026	Pierce Gas Plant	Natural Gas Plant	9/19/2019	RCRA - Used Oil	40 CFR 279.22(c)(1)	The mobile used oil tank located near the maintenance building was not marked as "Used Oil" as required by 6 CCR 1007-3 Part 279.22(c)(1)	[REDACTED] [REDACTED]	The facility marked the tank as "Used Oil" This corrective action is complete.	11/17/2025	1/9/2026	12/10/2025	N/A	Negligible (administrative)
1/9/2026	Pierce Gas Plant	Natural Gas Plant	9/19/2019	EPCRA	Tier II Reporting 312 40 CFR 370.10 40 CFR 370.40	The facility had records of a Tier II inventory submitted to the agency required under 40 CFR 370.10 and 40 CFR 370.40 for several chemicals stored above reporting threshold . Some chemicals stored onsite had the potential to exceed reporting thresholds but did not have Tier II inventory or documentation showing amounts were below threshold limits. These chemicals included Methanol stored in 6-300 gallon poartially filled tanks and 2-500 gallon partially filled tanks. Depending on how these tanks are managed, the facility has the potential to store methanol over the 10,000 lb reporting threshold. The facility stored Produced Water onsite in a large storage tank with a capacity to store over the 10,000lb threshold. Produced water was not reported on Tier II inventory. Propane used as refrigerant was not reported, the amount of propane stored on site was not documented.	[REDACTED] [REDACTED]	Determined the amounts of Methanol, Propane and Produced Water stored on site and then compared to the reporting thresholds. Based upon the updated calculations, these chemicals will be included in the 2025 Tier II report (due 3/1/2026).	11/17/2025	1/9/2026	3/1/2026	N/A	Negligible (administrative)
1/9/2026	Pierce Gas Plant	Natural Gas Plant	9/19/2019	Air	40 CFR 60 Subpart OOOOa	According to available records, reciprocating compressor rod packing information was not included in the annual reports required under 40 CFR 60.5385a (d)	[REDACTED] [REDACTED]	The reciprocating compressor rod packing information was included in the 12/18/2025 annual report submission This corrective action is complete.	11/17/2025	1/9/2026	12/18/2025	N/A	Negligible (administrative)
1/9/2026	Pierce Gas Plant	Natural Gas Plant	9/19/2019	Air	40 CFR 60 Subpart OOOOa	Records only available for discovered leaks. Additional monitoring information was unavailable.	[REDACTED] [REDACTED] [REDACTED]	Williams transitioned service providers for management of the LDAR Program in March 2025. During the transition, the new vendor completed LDAR tagging and inventory of applicable components and identified LDAR-relevant process streams and units on Piping & Instrumentation Drawings (P&IDs). As part of this scope, the vendor added 24 PRVs, 7 pumps, and 928 connectors, while 208 valves were removed from the LDAR inventory. In April 2025, the new vendor conducted Method 21 monitoring of valves, pumps, PRVs, and connectors in accordance with NSPS OOOOa, followed by a subsequent valve inspection in May. These two successive months of Method 21 inspections were performed to "re-set" LDAR compliance with OOOOa and align with Williams LDAR protocols.	11/17/2025	1/9/2026	5/31/2025	N/A	Negligible (administrative)
1/9/2026	Pierce Gas Plant	Natural Gas Plant	9/19/2019	RMP	40 CFR 68.160 Registration 40 CFR 68.175 Prevention program/Program 3. 40 CFR 68.180 Emergency response program and exercises.	RMP submittal data element errors that require correction: 1.1.b Parent Company #1 Name: Add the parent company name. 1.3 Other EPA Systems Facility ID: Add the TRI or Facility Registry Service - FRS ID: 110070666710 1.9.c. Facility or Parent Company WWW Home Page Address: Update or delete, the information appears to be a physical street address not a website. 7.4.f.2. Mitigation Systems in Use: Dikes - Confirm there are dikes constructed as a mitigation system, not sure dikes would mitigate a spill of NGL that would readily evaporate to the atmosphere. 9.8.a. OSHA Regulations at 29 CFR 1910.38: This data element should be "Yes" since the plant is subject to OSHA's emergency action plan regulations. 9.8.b. OSHA Regulations at 29 CFR 1910.120: This data element should be "No" since the plant is not subject to OSHA's HAZWOPER regulations.	[REDACTED] [REDACTED]	The facility updated the RMP submittal	11/17/2025	1/9/2026	12/10/2025	N/A	Negligible (administrative)
1/9/2026	Pierce Gas Plant	Natural Gas Plant	9/19/2019	RMP	40 CFR 68.165 Offsite Consequences Analysis	RMP Submittal Data Elements - Section 4. Flammables Worst Case Release Scenario 4.8.b. Public Receptors within Distance to Endpoint - Residences: "No" should be "Yes" This is inconsistent with the information in data element 4.7 that the residential population is "51". 4.8.e. Recreational Area: "No" should be "Yes" The Gastown Campground appears to be impacted by the worst case release, EPA considers campgrounds to be recreational area. 4.8.f. Major commercial, office or industrial areas: "Yes" - There does not appear to be a major commercial, office or industrial area that would be impacted by the release.	[REDACTED] [REDACTED]	The facility updated the RMP submittal	11/17/2025	1/9/2026	12/10/2025	N/A	Negligible (administrative)

Attachment 2
Detailed Response to EPA Questionnaire
4/9/2026

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1/9/2026	Pierce Gas Plant	Natural Gas Plant	9/19/2019	RMP	40 CFR 68.165 Offsite Consequences Analysis	RMP Submittal Data Elements - Section 4. Flammables Alternative Case Release Scenario 5.8.b. Public Receptors within Distance to Endpoint - Residences response: "No" should be "Yes" The response is inconsistent with the information in data element 5.7 that the residential population is "24". 5.8.e. Recreational Area: "No" should be "Yes" The Gastown Campground appears to be impacted by the alternative release, EPA considers campgrounds to be recreational area. 5.8.f. Major commercial, office or industrial areas reaponse: "Yes" should be "No" There does not appear that a major commercial, office or industrial areas would be impacted by the release.	[REDACTED] [REDACTED]	The facility updated the RMP submittal	11/17/2025	1/9/2026	12/10/2025	N/A	Negligible (administrative)
1/9/2026	Severance Compressor Station	Natural Gas Compressor Station	9/19/2019	EPCRA	Tier II Reporting 312 40 CFR 370.10 40 CFR 370.40	The facility was storing produced water onsite above the Tier II reporting threshold. The facility did not have records showing Tier II reports, required under 40 CFR 370.10 and 40 CFR 370.40, for the produced water were submitted to the agency.	[REDACTED] [REDACTED]	Determined the amount of produced water stored on site and will submit revised report for submittal coming due 3/1/2026.	11/17/2025	1/9/2026	3/1/2026	N/A	Negligible (administrative)
1/9/2026	Severance Compressor Station	Natural Gas Compressor Station	9/19/2019	Air	40 CFR 60 Subpart OOOOa	According to available records, reports required under 40 CFR 60.5385a (d) and 40 CFR 60.5397a (j) have not been submitted.	[REDACTED] [REDACTED]		11/17/2025	1/9/2026	12/18/2025	N/A	Negligible (administrative)