

From: [Randy Ammons](#)
To: [REDACTED]
Cc: [OCE](#); [Randy Ammons](#)
Subject: Re: Enforcement Discretion Request-Continental Carbon Company, Sunray Plant, RN102321577
Date: Thursday, May 21, 2020 1:58:56 PM

Good afternoon Mr. Araiza,

This is in response to your May 20, 2020 request seeking enforcement discretion to not conduct the 2020 second quarter cylinder gas audits (CGA) due to restricted access to the plant as a result of the COVID-19 pandemic. The TCEQ is committed to working with you as we respond to this pandemic. This request is approved for the second quarter CGA. If you have any questions or if new information becomes available, please feel free to contact us at any time.

Please continue to keep us updated as conditions change.

The TCEQ will revisit this issue at the appropriate time and reserves the right to withdraw this approval.

Regards,

Randy J. Ammons, Director
North Central and West Texas
Texas Commission on Environmental Quality

From: Araiza, Joseph <[REDACTED]>
Sent: Wednesday, May 20, 2020 11:16 AM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Saied Ashraf <saied.ashraf@tceq.texas.gov>; Eddy Vance <eddy.vance@tceq.texas.gov>
Subject: Enforcement Discretion Request

RE: Continental Carbon Company
Sunray Plant, Sunray Texas
Regulated Entity Number: RN102321577

Per 40 CFR Part 60 Appendix F and Permit Number 133873, Continental Carbon Company's Sunray carbon black plant (Sunray) is required to operate a continuous emission monitoring system (CEMS) to monitor emissions from its waste gas boiler stack. As part of the requirements to maintain a CEMS, Sunray is required to conduct quarterly cylinder gas audits (CGA). The plant successfully conducted its first CGA in the first quarter of 2020 with the assistance of CEMTEK, the vendor that installed the CEMS.

At this time, Sunray is requesting enforcement discretion from TCEQ to skip the second quarter CGA for the following reasons:

1. The nearby town of Dumas is currently a hotspot for Covid-19 infections

2. Sunray requires the assistance of CEMTEK to conduct a CGA
3. Sunray has restricted access to the plant to only essential visitors and believes that bringing CEMTEK onsite to conduct a CGA at this time is an unnecessary risk

Sunray still plans to bring CEMTEK onsite to conduct the 3rd quarter CGA. Please contact Joe Araiza at [REDACTED] or 713-818-3285 if you need further information regarding this request.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)