

From: [Jayme Sadlier](#)
To: [Ramon Simon](#)
Cc: [Jeff Saitas](#); [OCE](#)
Subject: RE: DRAFT - RE: Request for Consideration of Electronic Signatures on OP-CR01(s)
Date: Tuesday, June 30, 2020 1:09:38 PM
Attachments: [image001.png](#)

Mr. Simon,

Thank you for your response.

Sincerely,
Jayme Sadlier

From: Ramon Simon
Sent: Tuesday, June 30, 2020 11:39 AM
To: Jayme Sadlier <jayme.sadlier@tceq.texas.gov>
Cc: Jeff Saitas <[REDACTED]> OCE <OCE@tceq.texas.gov>
Subject: RE: DRAFT - RE: Request for Consideration of Electronic Signatures on OP-CR01(s)

Jayme,

Let this email serve as a retraction to the request – Covestro still only allows essential employees at our manufacturing facility, like so many others, even though the State has been “officially” opened, in order to help turn the corner on this pandemic. Nonetheless, we are using other avenues to get the signed OP-CR01s, such as FedEx, etc. to the Responsible Officials homes for signatures, even though this poses additional exposure as well, but serves as the next best expeditious route to get the necessary documents to the Agency.

I do hope the Agency will further look into Guidance around electronic signatures as EPA and even the IRS utilizes electronic signatures, not just for COVID-19, but even during ‘normal’ business operations.

Again, at this juncture, Covestro retracts our latest request. Thanks for your attention and time in considering our request.

Herzliche Grüße / Best regards,

Ramon Simon
Manager, Regulatory Affairs Covestro-NAFTA
Health Safety Environmental Quality



covestro.com
Office
281-383-6149
Mobile
832-205-3149
E-mail
[REDACTED]

Covestro LLC
8500 West Bay Road MS#21
Baytown, TX 77523-8727

From: Jayme Sadlier [<mailto:jayme.sadlier@tceq.texas.gov>]
Sent: Tuesday, June 30, 2020 10:46 AM
To: Ramon Simon
Cc: Jeff Saitas; OCE
Subject: RE: DRAFT - RE: Request for Consideration of Electronic Signatures on OP-CR01(s)

Good Morning Mr. Simon,

We would like to close out this enforcement discretion request. Would you please let me know when you plan to submit responses to the questions below or resubmit a more specific request?

Thank you,
Jayme

From: Jayme Sadlier
Sent: Thursday, June 18, 2020 12:27 PM
To: Ramon Simon <[REDACTED]>
Cc: Jeff Saitas <[REDACTED]>
Subject: DRAFT - RE: Request for Consideration of Electronic Signatures on OP-CR01(s)

Hello Mr. Simon,

The possible examples of the OP-CR01 submissions you listed (i.e., permit applications, public notice requirements, deviation reporting) are helpful in reviewing this enforcement discretion request. However, the request needs to be more specific regarding the actual submissions Covestro, LLC is not able to provide with an original signature (OP-CR01) due to COVID-19 limitations. Also, you state that facility administrative and management personnel are primarily working, but is it still possible for Covestro personnel to provide the original signatures via the OP-CR01? We have seen fewer enforcement discretion requests like this one now that "stay-at-home" orders have been lifted. Please provide the following information: 1) a list of specific submissions that require the original signatures on the OP-CR01 form; 2) the expected dates/duration/reporting period associated to each submission; and 3) the rule citation that Covestro is requesting enforcement discretion due to an inability to comply based on COVID-19 limitations.

Thank you,
Jayme Sadlier
(512) 239-1683

From: Ramon Simon <[REDACTED]>
Sent: Tuesday, June 16, 2020 3:13 PM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; 'jsaitas <[REDACTED]>
<[REDACTED]>
Subject: Request for Consideration of Electronic Signatures on OP-CR01(s)

Good Afternoon Ramiro, et. al.,

I am submitting this request to seek authorization on behalf of Covestro LLC, requesting authorization to utilize electronic signatures in lieu of original signatures on any of our OP-CR01(s) for various Agency (TCEQ) submissions requiring the accompaniment of an OP-CR01 (e.g., permit applications, public notice requirements, deviation reporting, etc.) during the continued working from home/social distancing requirements of COVID-19? Previously, we only requested authorization for submitting our semi-annual reporting, but now request the same authorization for other Agency correspondences/documentation/packages during COVID-19 while our facility administrative and management personnel are primarily working remotely.

If granted, please advise if we need to submit an additional notation on the documentation or submit additional copies to other Agency personnel?

Thanks for your time and consideration of this matter.

Herzliche Grüße / Best regards,

Ramon Simon

Manager, Regulatory Affairs Covestro-NAFTA
Health Safety Environmental Quality



covestro.com

Office

281-383-6149

Mobile

832-205-3149

E-mail

[REDACTED]

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Baytown, TX 77523-8727