

**From:** [Maria Lebron](#)  
**To:** [Tracy Miller](#); [Beth Seaton](#); [Brent Wade](#); [Randy Ammons](#); [David Durst](#)  
**Cc:** [Susan Johnson](#); [Jayme Sadlier](#); [Ramiro Garcia](#)  
**Subject:** RE: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's #1460 and #1461  
**Date:** Tuesday, March 24, 2020 11:09:22 AM

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All- The project manager reviewed the information provided and emailed his DFW contacts yesterday to let them know the request is approved.

We apologize for not following up with you sooner.

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**From:** Tracy Miller <[tracy.miller@tceq.texas.gov](mailto:tracy.miller@tceq.texas.gov)>  
**Sent:** Tuesday, March 24, 2020 11:01 AM  
**To:** Beth Seaton <[Beth.Seaton@tceq.texas.gov](mailto:Beth.Seaton@tceq.texas.gov)>; Brent Wade <[brent.wade@tceq.texas.gov](mailto:brent.wade@tceq.texas.gov)>; Randy Ammons <[randy.ammons@tceq.texas.gov](mailto:randy.ammons@tceq.texas.gov)>; David Durst <[david.durst@tceq.texas.gov](mailto:david.durst@tceq.texas.gov)>; Maria Lebron <[maria.lebron@tceq.texas.gov](mailto:maria.lebron@tceq.texas.gov)>  
**Cc:** Susan Johnson <[susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov)>; Jayme Sadlier <[jayme.sadlier@tceq.texas.gov](mailto:jayme.sadlier@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** RE: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's #1460 and #1461

Thanks, Beth.

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**From:** Beth Seaton <[Beth.Seaton@tceq.texas.gov](mailto:Beth.Seaton@tceq.texas.gov)>  
**Sent:** Tuesday, March 24, 2020 10:58 AM  
**To:** Tracy Miller <[tracy.miller@tceq.texas.gov](mailto:tracy.miller@tceq.texas.gov)>; Brent Wade <[brent.wade@tceq.texas.gov](mailto:brent.wade@tceq.texas.gov)>; Randy Ammons <[randy.ammons@tceq.texas.gov](mailto:randy.ammons@tceq.texas.gov)>; David Durst <[david.durst@tceq.texas.gov](mailto:david.durst@tceq.texas.gov)>; Maria Lebron <[maria.lebron@tceq.texas.gov](mailto:maria.lebron@tceq.texas.gov)>  
**Cc:** Susan Johnson <[susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov)>; Jayme Sadlier <[jayme.sadlier@tceq.texas.gov](mailto:jayme.sadlier@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** RE: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's #1460 and #1461

Tracy – I person was looking at it and I think they had already responded. Will follow-up with update later today. Beth

---

**From:** Tracy Miller <[tracy.miller@tceq.texas.gov](mailto:tracy.miller@tceq.texas.gov)>  
**Sent:** Tuesday, March 24, 2020 10:57 AM  
**To:** Beth Seaton <[Beth.Seaton@tceq.texas.gov](mailto:Beth.Seaton@tceq.texas.gov)>; Brent Wade <[brent.wade@tceq.texas.gov](mailto:brent.wade@tceq.texas.gov)>; Randy Ammons <[randy.ammons@tceq.texas.gov](mailto:randy.ammons@tceq.texas.gov)>; David Durst <[david.durst@tceq.texas.gov](mailto:david.durst@tceq.texas.gov)>; Maria Lebron <[maria.lebron@tceq.texas.gov](mailto:maria.lebron@tceq.texas.gov)>  
**Cc:** Susan Johnson <[susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov)>; Jayme Sadlier <[jayme.sadlier@tceq.texas.gov](mailto:jayme.sadlier@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** RE: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's

#1460 and #1461

Good morning –

Has there been a decision on this one?

Thanks, Tracy

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**From:** Beth Seaton <[Beth.Seaton@tceq.texas.gov](mailto:Beth.Seaton@tceq.texas.gov)>  
**Sent:** Friday, March 20, 2020 2:56 PM  
**To:** Brent Wade <[brent.wade@tceq.texas.gov](mailto:brent.wade@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>; Randy Ammons <[randy.ammons@tceq.texas.gov](mailto:randy.ammons@tceq.texas.gov)>; David Durst <[david.durst@tceq.texas.gov](mailto:david.durst@tceq.texas.gov)>; Beth West <[beth.west@tceq.texas.gov](mailto:beth.west@tceq.texas.gov)>; Maria Lebron <[maria.lebron@tceq.texas.gov](mailto:maria.lebron@tceq.texas.gov)>  
**Cc:** Tracy Miller <[tracy.miller@tceq.texas.gov](mailto:tracy.miller@tceq.texas.gov)>; Susan Johnson <[susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov)>; Jayme Sadlier <[jayme.sadlier@tceq.texas.gov](mailto:jayme.sadlier@tceq.texas.gov)>; Monica Aplin <[Monica.Aplin@tceq.texas.gov](mailto:Monica.Aplin@tceq.texas.gov)>; Jacqueline Cullather <[Jacqueline.Cullather@tceq.texas.gov](mailto:Jacqueline.Cullather@tceq.texas.gov)>  
**Subject:** RE: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's #1460 and #1461

Will do

---

**From:** Brent Wade <[brent.wade@tceq.texas.gov](mailto:brent.wade@tceq.texas.gov)>  
**Sent:** Friday, March 20, 2020 2:51 PM  
**To:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>; Randy Ammons <[randy.ammons@tceq.texas.gov](mailto:randy.ammons@tceq.texas.gov)>; David Durst <[david.durst@tceq.texas.gov](mailto:david.durst@tceq.texas.gov)>; Beth West <[beth.west@tceq.texas.gov](mailto:beth.west@tceq.texas.gov)>; Beth Seaton <[Beth.Seaton@tceq.texas.gov](mailto:Beth.Seaton@tceq.texas.gov)>; Maria Lebron <[maria.lebron@tceq.texas.gov](mailto:maria.lebron@tceq.texas.gov)>  
**Cc:** Tracy Miller <[tracy.miller@tceq.texas.gov](mailto:tracy.miller@tceq.texas.gov)>; Susan Johnson <[susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov)>; Jayme Sadlier <[jayme.sadlier@tceq.texas.gov](mailto:jayme.sadlier@tceq.texas.gov)>; Monica Aplin <[Monica.Aplin@tceq.texas.gov](mailto:Monica.Aplin@tceq.texas.gov)>; Jacqueline Cullather <[Jacqueline.Cullather@tceq.texas.gov](mailto:Jacqueline.Cullather@tceq.texas.gov)>  
**Subject:** RE: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's #1460 and #1461

Thanks Ramiro. Beth, Maria...please review. Thanks!

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**From:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Sent:** Friday, March 20, 2020 2:45 PM  
**To:** Randy Ammons <[randy.ammons@tceq.texas.gov](mailto:randy.ammons@tceq.texas.gov)>; David Durst <[david.durst@tceq.texas.gov](mailto:david.durst@tceq.texas.gov)>; Beth West <[beth.west@tceq.texas.gov](mailto:beth.west@tceq.texas.gov)>; Brent Wade <[brent.wade@tceq.texas.gov](mailto:brent.wade@tceq.texas.gov)>  
**Cc:** Tracy Miller <[tracy.miller@tceq.texas.gov](mailto:tracy.miller@tceq.texas.gov)>; Susan Johnson <[susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov)>; Jayme Sadlier <[jayme.sadlier@tceq.texas.gov](mailto:jayme.sadlier@tceq.texas.gov)>; Monica Aplin <[Monica.Aplin@tceq.texas.gov](mailto:Monica.Aplin@tceq.texas.gov)>; Jacqueline Cullather <[Jacqueline.Cullather@tceq.texas.gov](mailto:Jacqueline.Cullather@tceq.texas.gov)>  
**Subject:** FW: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's #1460 and #1461

Hello Randy,

Here is the other D/FW Airport request. Will you please take the lead. It looks like we will need to coordinate with Brent Wade and Beth Seaton since it is related to remediation/VCP.

Thank you.

Ramiro

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**From:** Collins, Shannon L <[REDACTED]>  
**Sent:** Friday, March 20, 2020 1:55 PM  
**To:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>; OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Cc:** Frost, Heather L <[REDACTED]> Greer, James <[REDACTED]>  
**Subject:** RE: COVID19 Regulatory Relief Requests - Dallas Fort Worth International Airport, VCP's #1460 and #1461

Mr. Garcia,

In response to the notice from the Office of Compliance and Enforcement received on Wednesday, March 18, 2020, Dallas Fort Worth International Airport (DFW Airport) is forwarding a request sent to Mr. Chris Swiderski with the TCEQ VCP/CA Section, Remediation Division, regarding DFW Airport's VCP's #1460 and #1461. Please see the attached letter, maps and TCEQ response.

Please also advise if a different action may be required. Thank you and take care!!!!

**Shannon Collins (Dyer), R.E.M.**  
Environmental Operations Analyst  
Environmental Affairs Department

Dallas/Fort Worth International Airport  
P.O. Box 619428  
DFW Airport, Texas 75261

W (972) 973-5567  
F (972) 973-5561  
C (469) 951-2159  
[www.dfwairport.com](http://www.dfwairport.com)

---

**From:** Texas Commission on Environmental Quality <[tceq@service.govdelivery.com](mailto:tceq@service.govdelivery.com)>  
**Sent:** Wednesday, March 18, 2020 2:02 PM  
**To:** Greer, James <[REDACTED]>  
**Subject:** COVID19 Regulatory Relief Requests - Please Read on Behalf of the Office of Compliance and Enforcement

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News from IHW



## From the Office of Compliance and Enforcement

With the onset of COVID-19 (coronavirus) and the Governor's Proclamation of a state of disaster in Texas, the TCEQ is aware that regulated entities may be experiencing an impact from a reduced workforce necessary to maintain normal operations at some facilities. All regulated entities are encouraged to take all available actions necessary to ensure compliance with environmental regulations and permit requirements to protect the health and safety of Texans and the environment. However, in the instance that noncompliance is unavoidable directly due to impact from the coronavirus, an email box has been established by TCEQ to accept requests for potential enforcement discretion. Regulated entities should email both [OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov) and [Ramiro.Garcia@tceq.texas.gov](mailto:Ramiro.Garcia@tceq.texas.gov) with specific information related to enforcement discretion requests. The OCE (Office of Compliance & Enforcement) email box is monitored daily by multiple TCEQ staff who will ensure the requests are expeditiously addressed. The TCEQ's goal is to provide a response to the regulated entity's request within 24 to 48 hours.

The email to OCE should at a minimum include the following:

- Concise statement supporting request for enforcement discretion
- Anticipated duration of need for enforcement discretion
- Citation of rule / permit provision for which enforcement discretion is requested

Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Any questions regarding this guidance should be directed to the OCE email box

and a response will be provided.

Sincerely,

Ramiro Garcia, Jr

Deputy Director, Office of Compliance & Enforcement

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March 18, 2020

Certified Mail #7014 2120 0003 4633 7029

Chris Swiderski  
Environmental Cleanup Section  
Remediation Division  
Texas Commission on Environmental Quality  
P.O. Box 13087, MC 221  
Austin, Texas 78711-3087

RE: DFW International Airport  
Request for Temporary Emergency Change in Sampling Protocols  
Northwest Cargo Area of Concern (AOC) B1 and B2 Voluntary Cleanup Program  
(VCP) No. 1461, and  
Northeast Cargo VCP No. 1460  
Customer No. CN601700610; Regulated Entity No. RN102221027

Dear Mr. Swiderski:

As we discussed on Monday March 16, 2020, due to the recent world events of the Covid-19 (Coronavirus) pandemic, both the airline industry and Dallas/Fort Worth International Airport are experiencing significant interruption to normal operations. DFW is transitioning to a virtual work environment with all the site staff focused on essential operational tasks and pandemic response. We are currently looking for any way possible to maintain and sustain our current operations.

As an emergency measure, with the TCEQ's approval and agreement, DFW Airport respectfully requests to temporarily change sampling protocols for both the NW Cargo VCP #1461 and the NE Cargo VCP #1460, until the end of DFW's fiscal year (September 2020). Maintaining the integrity of the plumes and ensuring any plume migration stays within DFW Airport's boundaries will still be the number one priority. As such DFW proposes to reduce sampling the number of wells in each area to only sampling perimeter alternate point of exposure (APOE) wells. The reduction will be as follows for NW Cargo, VCP #1461:

**VCP #1461, NW Cargo, AOC B1**

Reduce the number of monitor wells sampled from 94 wells to 12 alternate point of exposure (APOE) wells. Sampling events will include June and September 2020. (See attached map)

**VCP #1461, NW Cargo, AOC B2**

Reduce the number of wells sampled from 29 wells to 9 alternate point of exposure (APOE) wells. Sampling event will include April 2020. (See attached map)



**VCP #1460 and #1461**  
**March 18, 2020**  
**Page 2 of 2**

As we discussed for NE Cargo, VCP #1460, the chlorinated solvent plume has a critical area where the 1,1 DCE plume has migrated to an APOE well. Therefore, for VCP #1461, in lieu of sampling all APOE wells, DFW will sample APOE wells for the chlorinated plume as well as several wells within the footprint of the chlorinated plume. The reduction in wells overall will be as follows:

**VCP #1460, NE Cargo**

Reduce the number of wells sampled from 48 wells to 6 alternate point of exposure (APOE) wells and 5 attenuation monitoring point (AMP) wells in the chlorinated plume. Sampling events will include June and September 2020. (See attached map)

As always, DFW Airport appreciates TCEQ's input, guidance and support during these uncertain times. If you have any questions or wish to discuss this further, please contact me at (972) 973-5567 or James Greer at (972) 973-5568.

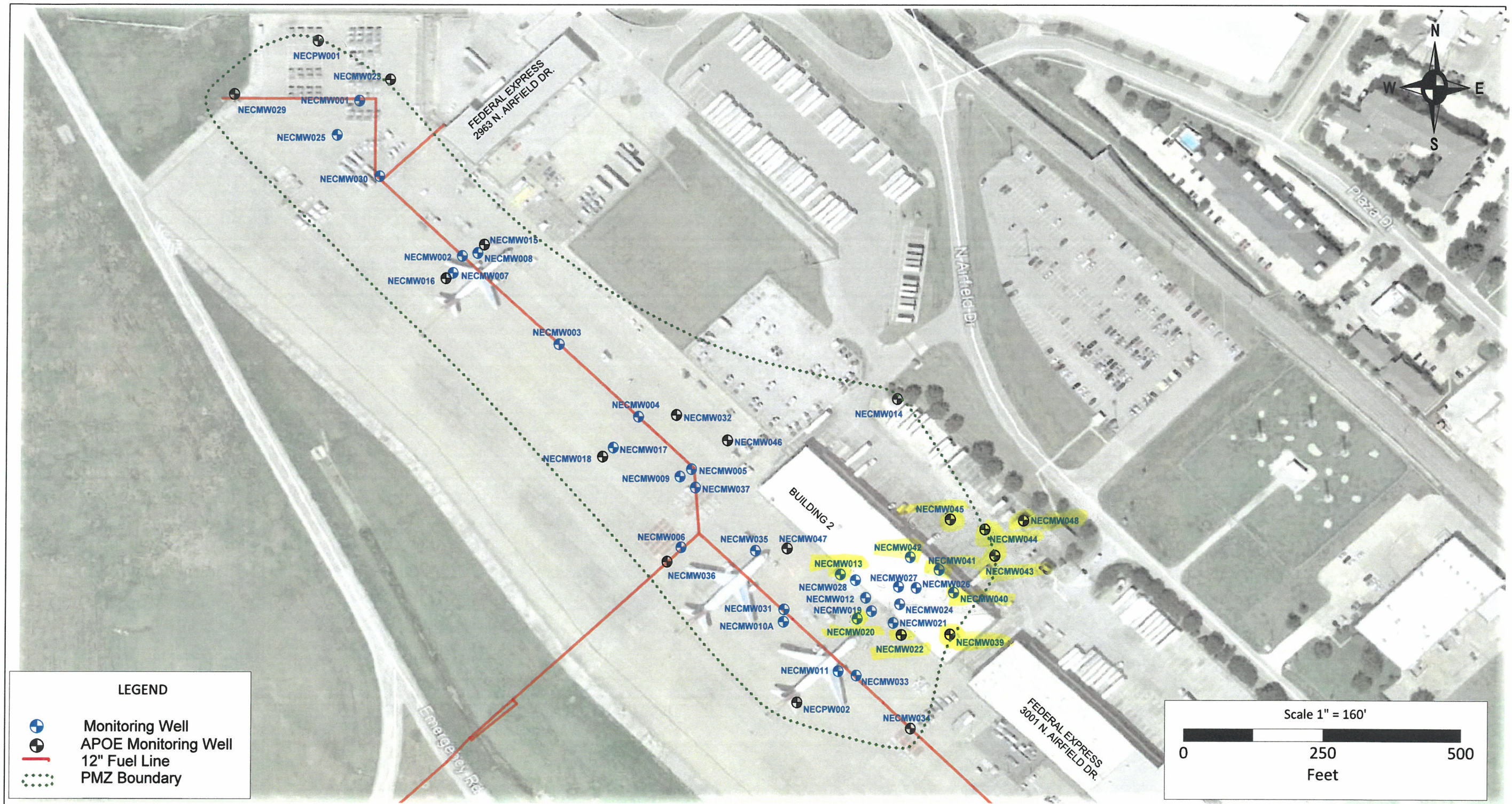
Sincerely,



Shannon Collins  
Environmental Operations Analyst  
Environmental Affairs Department  
DFW International Airport

cc: R. Horton  
H. Frost  
J. Greer  
E. Rodriguez  
NE and NW Cargo VCP #1460 and #1461 File

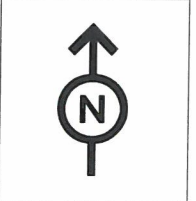
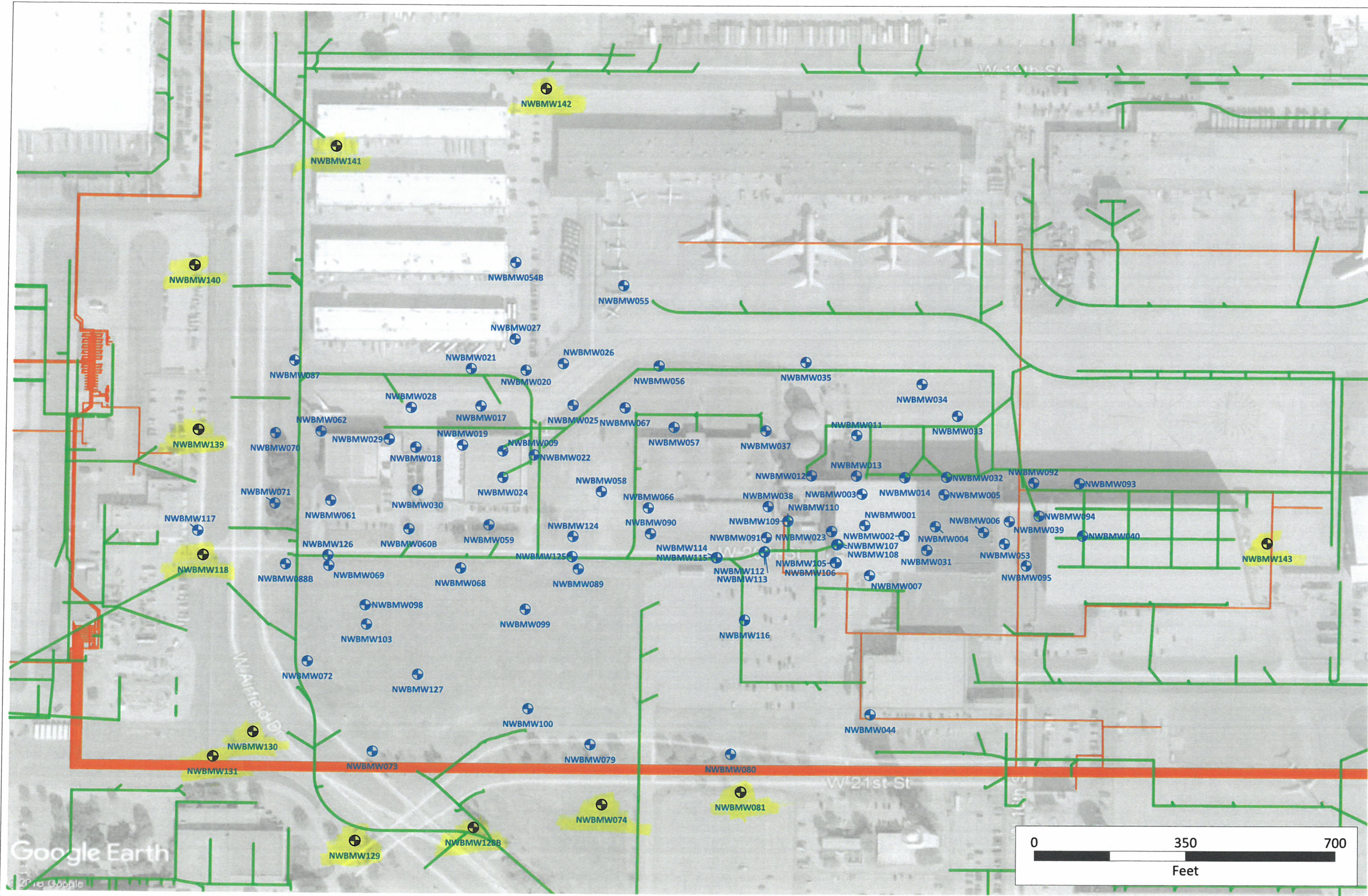








# NE CARGO Monitoring Well Location Map 2019 PRAC

# Attachment 1A





**LEGEND**

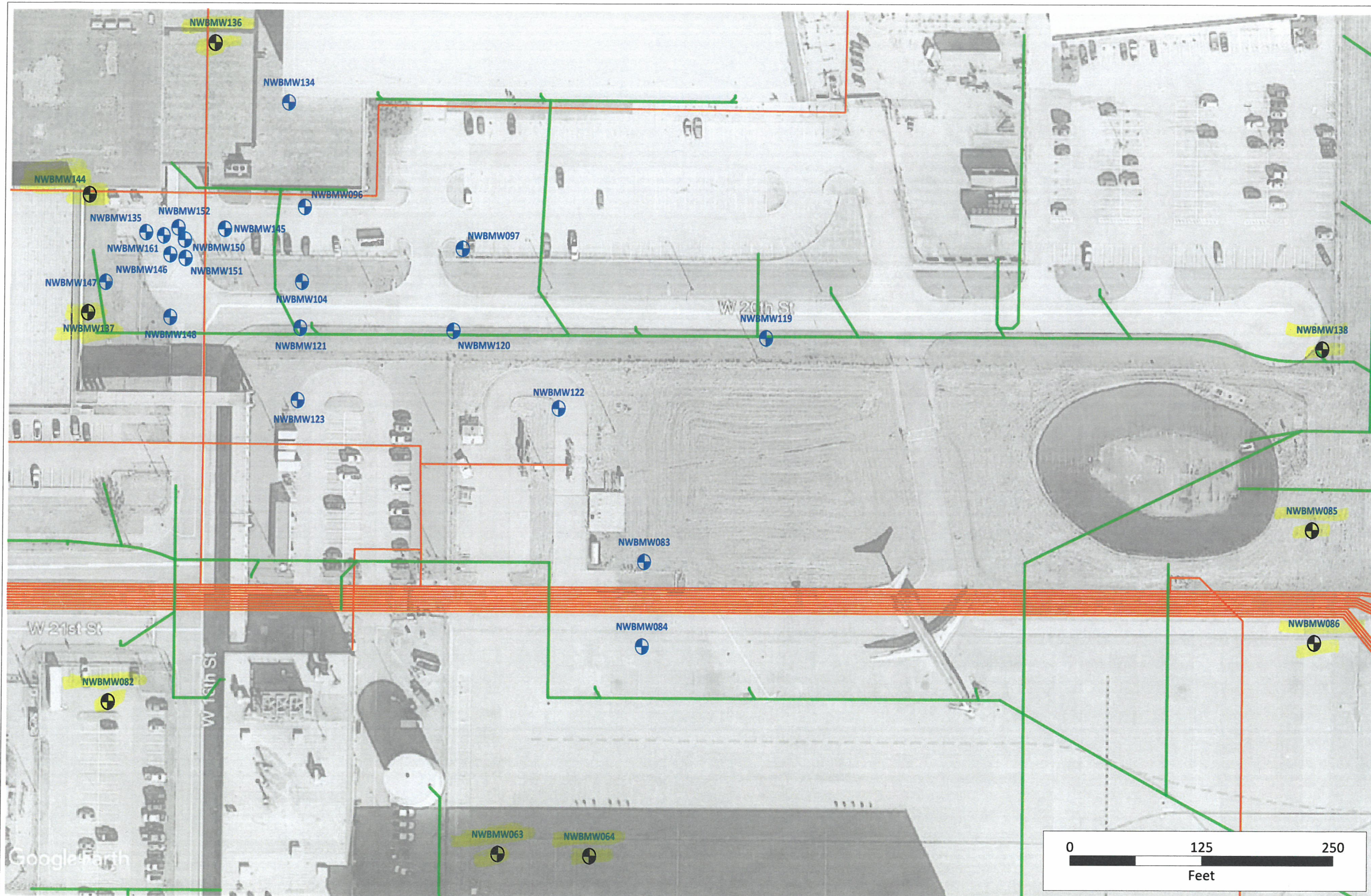
-  Monitoring Well
-  APOE Monitoring Well
-  Jet Fuel Supply Line
-  Stormwater Drain Line



**Monitoring Well Location Map  
NW Cargo AOC B1 - RAER (2017 - 2020)**

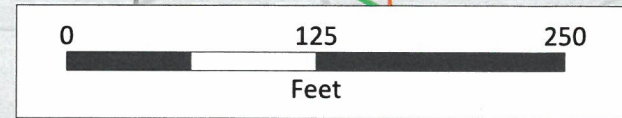
**Attachment  
1A**





**LEGEND**

- Monitoring Well
- APOE Monitoring Well
- Jet Fuel Supply Line
- Stormwater Drain Line



Aerial Image: Google Earth (11/25/2018)



## Collins, Shannon L

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**From:** Chris Swiderski <chris.swiderski@tceq.texas.gov>  
**Sent:** Thursday, March 19, 2020 11:47 AM  
**To:** Collins, Shannon L  
**Cc:** Greer, James; Frost, Heather L  
**Subject:** Re: DFW Airport Request for Temporary Sample Reduction, VCP #1460 and #1461

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Shannon: Thanks for the update. I will look forward to your reports in the mail. Please let me know if you have any questions.

Thanks,

Chris Swiderski, Project Manager  
VCP/CA Section  
Remediation Division  
Texas Commission on Environmental Quality

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**From:** "Collins, Shannon L" <[REDACTED]>  
**Date:** Wednesday, March 18, 2020 at 4:05 PM  
**To:** Chris Swiderski <chris.swiderski@tceq.texas.gov>  
**Cc:** "Greer, James" <[REDACTED]> "Frost, Heather L" <[REDACTED]>  
**Subject:** DFW Airport Request for Temporary Sample Reduction, VCP #1460 and #1461

Mr. Swiderski,

Please see the attached letter of request for temporary sample reductions as we discussed on Monday, March 16, 2020. Also attached are maps of each area where DFW Airport is requesting temporary reductions. A hard copy as well as an electronic version are forthcoming via certified mail. DFW greatly appreciates the TCEQ's understanding. Please contact me if you have any further questions or concerns. Thank you.

**Shannon Collins (Dyer), R.E.M.**  
Environmental Operations Analyst  
Environmental Affairs Department

Dallas/Fort Worth International Airport  
P.O. Box 619428  
DFW Airport, Texas 75261

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