

From: [Jonathan Walling](#)
To: [REDACTED]
Cc: [OCE](#)
Subject: Dixie Chemical Bayport Facility Title V Extension Request
Date: Thursday, April 9, 2020 12:54:39 PM

Good afternoon, Mr. Thomas:

The TCEQ will exercise enforcement discretion for Dixie Chemical Bayport Facility to submit the required Title V deviation report. This enforcement discretion will be in effect until April 30, 2020. The deviation report must be submitted as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please re-submit your request.

Enforcement discretion is limited to the Texas Commission on Environmental Quality. It does not limit EPA's ability to enforce federal regulations.

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

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area
Texas Commission on Environmental Quality

From: Baca, Thomas <[REDACTED]>
Sent: Thursday, April 9, 2020 8:02 AM
To: OCE <OCE@tceq.texas.gov>
Cc: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Subject: Dixie Chemical Bayport Facility Title V Extension Request

Dixie Chemical Bayport Facility
10601 Bay Area Blvd.
RN1002184486
Title V Permit #O3669

Good Morning,

I would like to formally request an extension to our facilities Title V deviation reporting deadline. Our Title V permit was issued on 9/11/2019, with the 6-month deviation report due March 11th. The 30-day grace period ends on April 11, 2020. We unfortunately will not have the report completed with complete accuracy in 2 days. The reasons for the request for a 15-day extension are outlined below:

-Due to the recent Covid-19 pandemic, our facility has been operating at a reduced work force, with our Environmental department consisting of myself, who also oversees

the EHS department as a whole. With schools, daycares, and most services closed, our workforce has been severely impacted.

-This is a new department with all new staff, (including myself) having been there less than 3 months.

-This will be our facilities first reporting period under the new Title V permit, and there is a fair amount of "catch-up" being played from the previous staff.

-The Title V package is actively being worked on, (in conjunction with other reports such as our annual EI) and will be finished ASAP.

-There are continued active records being kept on any non-compliance issues, including details of our efforts to remain in compliance.

With the details provided, I hope to be granted at least a 15-day extension, so that Dixie Chemical can finalize our first ever deviation Title V report and verify its accuracy, to ensure compliance.

Regards,
Tom Baca

Thomas Baca

Environmental Manager | DixieChemical.com

○ 281-291-3367



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