

**From:** [Jonathan Walling](#)  
**To:** [Rochelle Johnlouis](#)  
**Cc:** [OCE](#)  
**Subject:** RN110456936, CN603277302- Extension  
**Date:** Tuesday, June 2, 2020 11:05:22 AM

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Good morning, Ms. Johnlouis:

Your request to extend the date of TOx and flare testing at Galveston LFG, LLC is approved. Enforcement discretion for this activity will be valid until June 10, 2020. If the test cannot be completed by this date, please submit a new request for consideration.

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

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**From:** Rochelle Johnlouis <[REDACTED]>  
**Sent:** Tuesday, June 2, 2020 6:44 AM  
**To:** Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>; OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Cc:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** RE: RN110456936, CN603277302

Hello,

Thanks for your quick response. We are planning to run the test on June 10, 2020. Please consider this as our formal request for enforcement discretion to be extended.

Thank you,  
Rochelle Johnlouis

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**From:** Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>  
**Sent:** Friday, May 29, 2020 11:43 AM  
**To:** Rochelle Johnlouis <[REDACTED]> OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Cc:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** RE: RN110456936, CN603277302

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Good morning, Ms. Johnlouis:

Thank you for the update. Please do let us know as soon as possible how much additional time will be needed to conduct the required testing and submit a formal request for enforcement discretion to be extended and considered.

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

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**From:** Rochelle Johnlouis <[REDACTED]>  
**Sent:** Friday, May 29, 2020 9:58 AM  
**To:** Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>; OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Cc:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** FW: RN110456936, CN603277302

Hello,

On 5-28-20 a storm impacted our site and rendered the TOx inoperable. Due to this we are unable to perform the initial test and will perform this test as soon as the TOx is back in operation and we can get back on the vendor's schedule.

We will contact you as soon as we have a definitive date that we can test this equipment.

Please let me know if you should have any questions.

Thanks,  
Rochelle Johnlouis  
832.557.4148

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**From:** Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>  
**Sent:** Thursday, April 23, 2020 9:14 AM  
**To:** Rochelle Johnlouis <[REDACTED]>  
**Subject:** RE: RN110456936, CN603277302

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Good morning, Ms. Johnlouis.

Yes, that is correct.

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**From:** Rochelle Johnlouis <[REDACTED]>  
**Sent:** Wednesday, April 22, 2020 5:35 PM  
**To:** Jonathan Walling <[REDACTED]>  
**Cc:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Subject:** RE: RN110456936, CN603277302

Hello,

Just to clarify we will have until May 29, 2020 to perform these tests?

Thanks,  
Rochelle

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**From:** Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>  
**Sent:** Wednesday, April 22, 2020 5:24 PM  
**To:** Rochelle Johnlouis <[REDACTED]>  
**Cc:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Subject:** RN110456936, CN603277302

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Good afternoon, Ms. Johnlouis:

The TCEQ will continue to exercise enforcement discretion for the initial TOx and flare testing at Galveston LFG, LLC. This enforcement discretion will be in effect until May 29, 2020. These activities must be conducted as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please submit a request to extend this deadline.

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

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**From:** Rochelle Johnlouis <[REDACTED]>  
**Sent:** Wednesday, April 22, 2020 10:17 AM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>

**Cc:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>; Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>  
**Subject:** RE: RN110456936, CN603277302

Hello,

Galveston LFG is would like to request the additional time of another month (June 7, 2020) to complete the initial TOx and Flare testing. We are requesting this additional time due to limited testing availability by the test company trying to work around the COVID-19 virus restrictions and all their client's specific situations.

Thanks,  
Rochelle Johnlouis  
Regional Environmental Specialist  
1412 North Sam Houston Parkway East – Suite 100  
Houston, TX 77032  
832.557.4148

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**From:** Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>  
**Sent:** Friday, March 27, 2020 3:04 PM  
**To:** Rochelle Johnlouis <[REDACTED]>  
**Cc:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Subject:** FW: RN110456936, CN603277302

<| **EXTERNAL MESSAGE** This message originates from an outside source. Verify sender address prior to responding. | >

Good afternoon, Ms. Johnlouis :

Your request to delay the initial TOx and flare testing at Galveston LFG, LLC is approved and valid through May 7, 2020. The test should be completed as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please re-submit your request.

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

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**From:** Rochelle Johnlouis <[REDACTED]>  
**Sent:** Friday, March 27, 2020 12:48 PM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Cc:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** RN110456936, CN603277302

To Whom It May Concern,

In response to the COVID-19 pandemic and to ensure the safety of our staff, Galveston LFG, LLC (Pollution Control Project Air Quality Standard Air Permit No. 152841), will be forced to delay the initial TOx and Flare testing. This test was originally scheduled to be performed on April 7, 2020. Galveston LFG, LLC will continue to monitor the pandemic and will perform the tests in May if the situation improves.

Rochelle Johnlouis  
Regional Environmental Specialist  
1412 North Sam Houston Parkway East – Suite 100  
Houston, TX 77032  
832.557.4148