

**From:** [Jonathan Walling](#)  
**To:** [Charlie Mingo](#); [Michael Lockwood](#); [Brian Smith](#); [David Seifert](#)  
**Cc:** [OCE](#)  
**Subject:** Goodyear Beaumont Regulatory Relief Request\_Dec2020  
**Date:** Thursday, December 17, 2020 4:00:51 PM  
**Attachments:** [Goodyear Beaumont TCEQ Regulatory Relief.pdf](#)

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Good afternoon, Mr. Mingo:

The TCEQ has evaluated your request for enforcement discretion for December 2020 Leak Detection and Repair Monitoring at Goodyear Tire & Rubber Company's Beaumont Chemical Plant, which is required by 30 Texas Administrative Code Chapter 115, Subpart D, Division 3, 40 Code of Federal Regulations 63, Subparts H and FFFF, and New Source Review Permits 124670 and 22110.

The TCEQ will exercise enforcement discretion for these activities which will be valid until January 31, 2021. The required activities shall be completed as soon as practicable, as conditions allow, by this date.

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

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.

Regards,

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

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**From:** Charlie Mingo <[REDACTED]>  
**Sent:** Thursday, December 17, 2020 12:52 PM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Cc:** Michael Lockwood <[REDACTED]> Brian Smith <[REDACTED]> David Seifert <[REDACTED]>  
**Subject:** Goodyear Beaumont Regulatory Relief Request

Dear Mr. Garcia.

Attached is a letter from The Goodyear Tire & Rubber Company (Goodyear), Beaumont Chemical Plant, Beaumont, Texas requesting temporary relief from certain provisions of statutes, rules, orders and permits to minimize risk of exposure and otherwise respond to COVID-19 without sacrificing the protection of human health and the environment.

If you have any questions regarding Goodyear's request for Regulatory Relief, please feel free to contact me via email or cell phone (409) 658-8121.

**Charlie Mingo**

Chemical Business Team Leader Environmental

The Goodyear Tire & Rubber Company

11357 IH 10 SW at Smith Road

Beaumont, Texas

Phone: 409 – 794-5282

Fax: 409 – 794- 5365

Email: 

# The Goodyear Tire & Rubber Company

## Beaumont Chemical Plant

VIA EMAIL TO OCE.TCEQ.TEXAS.GOV AND CERTIFIED U.S. MAIL: 9171 9999 9170 3585 1161 41

December 17, 2020

Mr. Ramiro Garcia  
Deputy Director  
Texas Commission on Environmental Quality  
12100 Park 35 Circle  
Austin, Texas 78753

**Re: The Goodyear Tire & Rubber Company, Beaumont Chemical Plant  
Novel Coronavirus (COVID-19) Response and Regulatory Relief for  
LDAR Monitoring**

On behalf of The Goodyear Tire & Rubber Company (Goodyear) and pursuant to Governor Greg Abbott's March 13, 2020 declaration of a State of Disaster as part of the State's efforts to respond to the novel coronavirus (COVID-19), this letter requests temporary relief from certain provisions of statutes, rules, orders and permits in an effort to minimize risk of exposure and otherwise respond to COVID-19 without impacting the protection of human health and the environment.

Goodyear is committed to safe and environmentally responsible operation of its operating sites. To protect both its employees, site contractors, and the general public, Goodyear has established a Return to Work policy for employees and contractor that contracted COVID-19 or were potentially exposed.

Goodyear is seeking relief to accommodate Goodyear's Return to Work policy in response to COVID-19 at its Beaumont Chemical Plant, as set forth below:

### **December 2020 Leak Detection and Repair Monitoring**

**Rule Citation: 30 TAC 115, Subchapter D, Division 3  
40 CFR 63 Subpart H  
40 CFR 63 Subpart FFFF**

**TCEQ NSR Air Permit (Nos. 124670 and 22110): Section Equipment Leaks Fugitives**

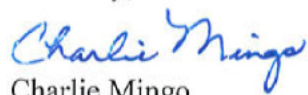
Goodyear is requesting an extension of time to complete annual leak detection and repair monitoring at the Beaumont Chemical Plant required by the referenced TCEQ permits and applicable regulations. Hydrochem, the contractor that performs this monitoring for Goodyear, [REDACTED]

[REDACTED]

Accordingly, the required annual leak detection and repair monitoring may not be completed before the end of the year. Goodyear currently expects Hydrochem to complete monitoring for the remaining approximately 1600 components in January 2021.

This request covers only those provisions requiring activities that are inconsistent with implementation of Goodyear's COVID-19 response, while maintaining safe and environmentally responsible operation. If you have any questions about this request, please contact Charlie Mingo via email ([REDACTED]).

Sincerely,



Charlie Mingo  
Chemical Business Team Leader Environmental

cc: Mrs. Sarah Kirksey – TCEQ Region 10, Air Section Manager  
Sarah.Kirksey@tceq.texas.gov