

From: [Jayme Sadlier](#)
To: [REDACTED]
Cc: [Ramiro Garcia](#); [OCE](#); [Donna Huff](#); [Danielle Nesvacil](#); [Greg Yturralde](#); [Jill Dickey](#)
Subject: Re: Request for Enforcement Discretion until June 30, 2020: Delays to AEIR for BG0526G - RN102459393 - CN603252040
Date: Tuesday, May 19, 2020 7:25:58 PM
Attachments: [FW Delays to AEIR for BG0526G - RN102459393 - CN603252040.msg](#)

Hello Mr. Halleran,

The TCEQ reviewed the request for enforcement discretion to submit Intertek Automotive Research's 2019 emissions inventory and associated fees no later than June 30, 2020. Based on the COVID-19 related limitations described in your email below and attached, this request is approved. Please retain documentation adequate to document activities related to this noncompliance under enforcement discretion, including details of the best efforts to comply.

Thank you,
Jayme Sadlier, Special Assistant
TCEQ Office of Compliance & Enforcement

From: Timothy Halleran Intertek <[REDACTED]>
Sent: Monday, May 18, 2020 10:40 AM
To: Jill Dickey <jill.dickey@tceq.texas.gov>
Subject: Delays to AEIR for BG0526G - RN102459393 - CN603252040

Good morning Jill,

Thank you for your call. As discussed, I wanted to provide a written overview of the obstacles that have thus far prevented me from submitting Intertek Automotive Research's (IAR) EI for CY2019.

[REDACTED]

By 3/23/20 San Antonio and Bexar County had issued their public health order closing non-essential businesses to control the spread of SARS-CoV-2. While IAR was deemed essential and remained open, we were obliged to take numerous additional steps as part of our Infectious Disease Business Continuity Plan. The majority of that coordination fell to the Safety group of which I am a part. Sterilization, remote work, face covering and other protocols all had to be implemented and this took up the vast

majority of my time for several weeks.

On 4/13/20 the decision was made that in the face of declining test volume, all salaried staff would be moved to a 50% furlough. Since that time I have only been allowed to work every other week which has drastically reduced my ability to complete large projects like the EI since there is still much safety focused work to be done keeping the site and our employees safe. On 5/14/20 I was informed that the furlough rotations would be extended another four weeks lasting through 6/15/20 assuming business conditions improve along the way.

As I mentioned on the phone, I have never submitted a late EI in my eight years at IAR and it pains me to have fallen short this year. I am not attempting to provide excuses but to explain the externalities that have put me in the current predicament.

Assuming that furloughs are not extended beyond the new round of four weeks. I would expect to have the EI submitted before the end of June.

I understand that straggling EI's are disruptive for the Commission's staff and genuinely appreciate the empathy and patience shown to this point. The work you do is invaluable and I no way wish to hinder it.

If I can provide any additional details or information, please let me know.

Stay safe and healthy,

Tim

--

Tim Halleran, CSP, LEED AP

Quality, Environmental, Safety, Health Administrator
Transportation Technologies

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Mobile +1 626 390 1721

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<image007.png>

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<mime-attachment>

From: [Timothy Halleran Intertek](#)
To: [Mary Facundo](#)
Cc: [Jill Dickey](#)
Subject: FW: Delays to AEIR for BG0526G - RN102459393 - CN603252040
Date: Monday, May 18, 2020 10:45:09 AM
Attachments: [image001.png](#)

Good morning Mary,

I wanted to share my site's current state of affairs with you since you are waiting on our Fee Basis form. I cannot complete the fee basis form without completing the EI and I am having great difficulty accomplishing that as outlined below. As soon as the EI is complete, I will email the fee basis.

Hope all is well,

Tim

--

Tim Halleran,
Quality, Environmental, Safety, and Health Administrator
Intertek Automotive Research
Office: 210-706-1588
Mobile: 626-390-1721

From: Timothy Halleran Intertek
Sent: Monday, May 18, 2020 10:40 AM
To: jill.dickey@tceq.texas.gov
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Tim Halleran, CSP, LEED AP

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