

**From:** [Jonathan Walling](#)  
**To:** [Palmer, Todd B.](#); [REDACTED]  
**Cc:** [OCE](#)  
**Subject:** MPC Request related to COVID-19 Response - Blanchard GBR  
**Date:** Friday, June 5, 2020 1:35:21 PM

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Good afternoon, Mr. Palmer:

Your request for additional time to submit your Part B Permit Renewal Application for Blanchard's Texas City Land Treatment Facility is approved and valid until June 19, 2020. Please submit your application as soon as practicable before this date.

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:** Palmer, Todd B. <[REDACTED]>  
**Sent:** Wednesday, June 3, 2020 5:02 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:** Darcey, Larry <[REDACTED]>  
**Subject:** MPC Request related to COVID-19 Response - Blanchard GBR

Mr. Garcia,

Please find the following enforcement discretion request for the Blanchard Refining Company LLC (Blanchard) Galveston Bay Refinery (GBR) due to impacts from the COVID-19 pandemic. (RN 104085691, CN 604166868, Industrial Solid Waste Registration No. 34507, Hazardous Waste Permit No. HW-50183, EPA I.D. No. TXD072181381.

**Request:** Blanchard is requesting enforcement discretion for a delayed Part B Permit Renewal Application for its Texas City Land Treatment Facility (LTF)

**Reason for Request:** Collection of the information for the permit application has taken longer than expected due to COVID-19 working conditions. No on site meetings were available to develop the lengthy application. Normally consultants could be onsite for data collection and coordination. Additionally, both Blanchard employees and the consultants were working from home the entire duration of the application development. This added additional logistical delays to the process. The application has been drafted. It still needs a final review and signature.

**Duration:** Blanchard requests two additional weeks to route the final permit application for review and signatures.

**Rule Citation/Permit Condition:** 30 TAC 305.63(a)

**Mitigation Measures:** No mitigation measures are needed as no additional environmental risks will be present.

Thank you for your time and consideration with this matter. If you have any questions or comments, please feel free to contact me at (409) 370-2638 or [REDACTED]

Sincerely,

Todd Palmer  
Environmental Supervisor, Waste and Water  
Marathon Petroleum Company LP  
409-943-7248