

From: [Randy Ammons](#)
To: [REDACTED]
Cc: [OCE](#)
Subject: RE: Enforcement Discretion Request-Pampa Fuels (Permit Number 105050)
Date: Tuesday, March 31, 2020 2:09:44 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Good afternoon Mr. Hancock,

The TCEQ has received your request for enforcement discretion.

Your request for enforcement discretion on LDAR activities for the month of April 2020 due to limiting only essential personnel on the facility due to the COVID-19 pandemic is approved.

Please remember that while the TCEQ may give enforcement discretion for state rules, the EPA may still take action if violations of federal rules are documented.

The TCEQ is committed to working with you as we respond to the COVID-19 pandemic. If you have any questions or new information, please feel free to contact us at any time.

Regards,

Randy J. Ammons, Area Director
North Central and West Texas Area

From: Jansen Hancock <[REDACTED]>
Sent: Tuesday, March 31, 2020 10:00 AM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Subject: Enforcement Discretion Request

Good morning,

Pampa Fuels (Permit Number 105050) is requesting enforcement discretion on all LDAR testing for the month April, specifically Special Conditions 18, 19, & 20 of the attached permit. Pampa Fuels is a small facility, and all LDAR testing is conducted through third party contractors. In an effort to limit exposure to the Coronavirus, Pampa Fuels has limited all employees, visitors and contractors to essential personnel only. Pampa Fuels is a small facility (Not Title V) with an excellent LDAR history. LDAR results for the previous two years is shown below. Thanks for your consideration.

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
July	2019	0	0	0	0	0	0	0	0	0	0
August	2019	0	0	0	0	0	0	0	0	0	0
September	2019	0	0	0	0	0	0	0	0	1	0
October	2019	0	0	0	0	0	0	0	0	0	0
November	2019	0	0	0	0	0	0	0	0	0	0
December	2019	4	0	0	0	0	0	0	0	0	0
Totals		4	0	0	0	0	0	0	0	1	0
Process area shutdowns occurring during reporting period:											
Area Shutdown		Start Date		End Date							
Pamper Fuels, LLC		7/23/2019		7/26/2019							
Pamper Fuels, LLC		8/12/2019		8/14/2019							
Pamper Fuels, LLC		8/17/2019		8/17/2019							
Revisions To Master Equipment Summary:											
		Component Type	Added	Removed							
		Valves	0	0							
		Pumps	0	0							
		Pressure Relief Valves	0	0							
		Connectors	0	0							
		Compressors	0	0							
Delay of Repair Items											
Tag #	Location			Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date	
None during this time period.											
Previous DOR Item: None											

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
January	2019	0	0	0	0	0	0	0	0	0	0
February	2019	0	0	0	0	0	0	0	0	0	0
March	2019	2	0	0	0	0	0	0	0	0	0
April	2019	0	0	0	0	0	0	0	0	0	0
May	2019	0	0	0	0	0	0	0	0	0	0
June	2019	1	0	0	0	0	0	0	0	0	0
Totals		3	0	0	0	0	0	0	0	0	0
Process area shutdowns occurring during reporting period:											
Area Shutdown		Start Date		End Date							
Pamper Fuels, LLC		5/1/2019		1/26/2019							
Pamper Fuels, LLC		2/6/2019		2/6/2019							
Pamper Fuels, LLC		2/14/2019		3/1/2019							
Pamper Fuels, LLC		3/1/2019		3/11/2019							
Pamper Fuels, LLC		3/13/2019		3/14/2019							
Pamper Fuels, LLC		4/1/2019		4/1/2019							
Pamper Fuels, LLC		4/18/2019		4/19/2019							
Pamper Fuels, LLC		5/7/2019		5/7/2019							
Pamper Fuels, LLC		5/28/2019		5/28/19							
Pamper Fuels, LLC		5/31/2019		5/31/2019							
Revisions To Master Equipment Summary:											
		Component Type	Added	Removed							
		Valves	9	0							
		Pumps	0	0							
		Pressure Relief Valves	0	0							
		Connectors	29	0							
		Compressors	0	0							
Delay of Repair Items											
Tag #	Location			Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date	
None during this time period.											
Previous DOR Item: None											

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
July	2018	0	0	0	0	0	0	0	0	0	0
August	2018	0	0	0	0	0	0	0	0	0	0
September	2018	1	0	0	0	0	0	0	0	2	0
October	2018	0	0	0	0	0	0	0	0	0	0
November	2018	0	0	0	0	0	0	0	0	0	0
December	2018	3	0	0	0	0	0	0	0	0	0
Totals		4	0	0	0	0	0	0	0	2	0

Process area shutdowns occurring during reporting period:

Area Shutdown	Start Date	End Date
Plant Wide	8/22/2018	8/24/2018
Plant Wide	8/25/2018	8/29/2018
Plant Wide	9/27/2018	11/2/2018
Plant Wide	11/25/2018	11/25/2018
Plant Wide	12/15/2018	12/16/2018
Plant Wide	12/28/2018	-

Revisions To Master Equipment Summary:

Component Type	Added	Removed
Valves:	0	1
Pumps:	0	0
Pressure Relief Valves:	0	0
Connectors:	0	5
Compressors:	0	0

Delay of Repair Items

Tag #	Location	Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date
None during this time period.								

Previous DOR Item(s): None

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
January	2018	0	0	0	0	0	0	0	0	0	0
February	2018	0	0	0	0	0	0	0	0	0	0
March	2018	0	0	0	0	0	0	0	0	0	0
April	2018	0	0	0	0	0	0	0	0	0	0
May	2018	0	0	0	0	0	0	0	0	0	0
June	2018	0	0	0	0	0	0	0	0	0	0
Totals		0	0	0	0	0	0	0	0	0	0

Process area shutdowns occurring during reporting period:

Area Shutdown	Start Date	End Date
Pampa Fuels, LLC	2/6/2018	2/8/2018
Pampa Fuels, LLC	3/4/2018	3/5/2018
Pampa Fuels, LLC	3/11/2018	3/15/2018
Pampa Fuels, LLC	4/13/2018	4/14/2018
Pampa Fuels, LLC	5/5/2018	5/9/2018
Pampa Fuels, LLC	5/24/2018	5/25/2018
Pampa Fuels, LLC	6/7/2018	6/7/2018
Pampa Fuels, LLC	6/20/2018	6/20/2018
Pampa Fuels, LLC	6/22/2018	6/22/2018

Revisions To Master Equipment Summary:

Component Type	Added	Removed
Valves:	0	0
Pumps:	0	0
Pressure Relief Valves:	0	0
Connectors:	0	0
Compressors:	0	0

Delay of Repair Items

Tag #	Location	Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date
None during this time period.								

Previous DOR Item(s):

39700-000	G-03 E Side of V-531	Valve	6/22/2017	3/29/2018	No	USD	7/3/2017	4/30/2018
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Best Regards,

Jansen Hancock

Quality Control/Environmental Manager

Office: 806.370.7652

Cell: 806.663.2262

PAMPAFUELS

8201 FM 2300

PO Box 941

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