From: **Randy Ammons**

To: Cc:

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 <

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.

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				Valves Not Repaired in	Pump	Pumps Not Repaired in	Compressor	Compressors Not Repaired	Relief Valve	Relief Valves Not Repaired in	Comedor	Connectors Not Repaired
	Period	Year	Valve Leaks	15 Days	Looks	15 Days	Looks	in 15 Days	Looks	15 Days	Leaks	in 15 Days
	July	2018	0	0	0	0	0	0	0	0	0	0
T	August	2018	0	0	0	0	0	0	0	0	0	0
T	September	2018	1	0	0	0	0	0	0	0	2	0
T	October	2018	0	0	0	0	0	0	0	0	0	0
┪	November	2018	0	0	0	0	0	0	0	0	0	0
\exists	December	2018	3	0	0	0	0	0	0	0	0	0
-	Totals		4	0	0	0	0	0	0	0	2	- 0
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_	Area Shuto	iown		Start Date		End Date						
4	Plant Wide			8/22/2018		8/24/2018						
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-	Plant Wide			11/25/2018		11/25/2018						
7	Plant Wide			12/15/2018		12/16/2018						
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vel	dons To Mad	e r Bould	pment Summa	irv ·								
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			Type	Added	Removed							
_			Valves:	0	1							
4			Pumps:	0	0							
			Pressure Relief Valves:	0	0							
4			Connectors: Compressors:	0	5							
ela	y of Repair it											
	Tag #		Locatio n		Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Relation for Delay	Date Placed on 8D	Exp. Rep Date	
	None dufing	this time	period.									
TO V	four DOR Iten	ne: Non										
-												
Ï				Valves Not		Pumps No		Compress		Raio Valves	Not	Connec
	Destant		Notes and a series	Repaired in		Repairedi				alve Repaire		dar Not Rep
_	Period	Year	Valve Leaks	15 Days	Leaks	15 Days	Leaks	in 15 Day				
┙	January	2018	0	0	0	0	0	0	0	0	0	0
	February	2018	0	0	0	0	0	0	0	0	0	0
П	March	2018	0	0	0	0	0	0	0	0	0	0
╗	April	2018	0	0	0	0	0	0	0	0	0	0
\neg	May	2018	0	0	0	0	0	0	0	0	0	0
T	June	2018	0	0	0	0	0	0	0	0	0	0
7	Totals		0	0	0	0	0	0	0	0	0	0
D.O	e ssama shu	ido w ne	o courring du	ring reportin	o period							
Ï	Area Shut			Start Date		End Date						
+	Pampa Fuels.			2/6/2018		2/8/201						
	Pampa Fuels,			3/4/2018		3/5/201						
T	Pampa Fuels,	ЩC		3/11/2018	1	3/15/201	8					
	Pampa Fuels,			4/13/2018		4/14/201						
	Pampa Fuels,			5/5/2018		5/9/201						
	Pampa Fuels,			5/24/2018		5/25/201						
	Pampa Fuels,			6/7/2018		6/7/201		_	_		_	_
	Pampa Fuels, Pampa Fuels,			6/20/2018		6/20/1		-	_			
┪					,	0 22/20	10					
e vi	sons to Mac	zer Equ	ipm ent 3umm									
			Component	1	Dame							
4			Type	Added	Remove	2				_		
4			Valves:	0	0	+				_		
4			Pumps:	0	0	-	-		-			
			Pressure Relief Valves	0	0							
I			Connectors:	0	0							
			Compressors	. 0	0	-						
ola	y of Repairi	tem s										
	Tag #		Location	1	Equip.	Date Lea Detected			on Reason Delay			
7	None during	thi s tim	e period.									
	lous DOR Ite	m t.										
			Side of V-531	_	Valve	6/22/2017	3/29/201	8 No	USD	7/3/20	17 4/30/20	018

Best Regards,

Jansen Hancock

Quality Control/Environmental Manager

Office: 806.370.7652 Cell: 806.663.2262

PAMPAFUELS

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