

From: [Randy Ammons](#)
To: [Susie Harrington](#)
Cc: [Ramiro Garcia](#); [OCE](#); [David Galindo](#); [Erika Crespo](#); [Yvonna Miramontes](#)
Subject: RE: Trinity River Authority of Texas - Additional Information Requested by TCEQ
Date: Wednesday, July 15, 2020 3:45:22 PM
Attachments: [image001.png](#)

Good afternoon Ms. Harrington,

We have received the additional information regarding Twin Peaks in Irving and AFT Industries in Mansfield. This response will serve as approval of enforcement discretion as requested for the missed timeframes on follow-up sampling at both facilities.

Please let us know if we can be of additional assistance.

Randy J. Ammons, Director
North Central and West Texas Area
Texas Commission on Environmental Quality

From: Susie Harrington <harringtons@trinityra.org>
Sent: Tuesday, July 14, 2020 1:12 PM
To: Randy Ammons <randy.ammons@tceq.texas.gov>
Cc: Patty Cleveland <ClevelandP@trinityra.org>; John Bennett <BennettJ@trinityra.org>; Jennifer Moore <MooreJ@trinityra.org>; Howard Slobodin <slobodinh@trinityra.org>; molina.rudy@epa.gov; David Galindo <david.galindo@tceq.texas.gov>; Erika Crespo <Erika.Crespo@tceq.texas.gov>; Brent Candler <brent.candler@tceq.texas.gov>
Subject: Trinity River Authority of Texas - Additional Information Requested by TCEQ

Mr. Ammons:

Trinity River Authority of Texas (TRA) is in receipt of your email dated July 06, 2020, which grants enforcement discretion for all but two of the situations (reference TRA email to you on June 30, 2020) in which additional information is needed. Below are the answers to your questions:

1. The City of Irving's request for Twin Peaks (pages 27 – 28). The oil and grease exceedance occurred on January 29, 2020

When did the City of Irving become aware of the noncompliance?

[The City became aware of the noncompliance on March 8, 2020. It is important to note that the TRA Central Regional Wastewater System \(CRWS\) lab performed the analysis. In the beginning of the pandemic, TRA made the decision to increase proximity between lab analysts, as well as the amount of people in the lab per shift at one time, and establish social distancing protocol. These steps were preferred rather than risk losing lab personnel due to exposure or infection. TRA also requested customers reduce testing, if possible, to try to reduce the daily workload for lab personnel. These steps have resulted in a slightly higher sample analysis](#)

turnaround time.

Was Twin Peaks published for SNC as a result of this exceedance?

The CRWS pretreatment year ends May 30th each year, with the SNC publication required during the month of July. Currently, Twin Peaks is not scheduled to be published pending the outcome of this request.

2. The City of Mansfield's request for AFT Industries (pages 34-35)

When was the sample that detected the exceedance collected?

The sample was collected on January 28, 2020.

When did the City of Mansfield become aware of the exceedance?
(Resampling should have been conducted within 30 days of the City becoming aware of the exceedance.)

The City became aware of the noncompliance on March 5, 2020. Additionally, this facility's sample port is located inside the building. Due to distancing requirements, resampling was not possible.

It is important to note that the TRA CRWS lab performed the analysis. TRA made the decision to increase proximity between lab analysts, as well as the amount of people in the lab per shift at one time, and establish social distancing protocol. These steps were preferred rather than risk losing lab personnel due to exposure or infection. TRA also requested customers reduce testing, if possible, to try to reduce the daily workload for lab personnel. These steps have resulted in a slightly higher sample analysis turnaround time.

Was AFT Industries published for SNC as a result of this exceedance?

The CRWS pretreatment year ends May 30th each year, with the SNC publication required during the month of July. AFT Industries was determined to be in SNC, even without this noncompliance. The industry is currently scheduled to be published this month.

I hope this adequately answers your questions. Should you have any additional questions or need clarifications, please let us know.

Thank you,

Cynthia Robinson
Manager, Regulatory Resources
Northern Region

From: Randy Ammons <randy.ammons@tceq.texas.gov>

Sent: Monday, July 6, 2020 2:57 PM

To: Susie Harrington <harringtons@trinityra.org>

Cc: OCE <OCE@tceq.texas.gov>; David Galindo <david.galindo@tceq.texas.gov>; Erika Crespo

<Erika.Crespo@tceq.texas.gov>; Yvonna Miramontes <yvonna.miramontes@tceq.texas.gov>

Subject: Re: Trinity River Authority of Texas - Additional Information Requested by

Good afternoon Ms. Harrington:

This is in response to your email dated June 30, 2020 and attached letter dated June 23, 2020, requesting enforcement discretion. The TCEQ is exercising enforcement discretion on a case by case base for regulated entities due to the COVID-19 pandemic. This correspondence will serve as approval of enforcement discretion as detailed in your letter, except for the two situations mentioned below where additional information is needed:

2. The City of Irving's request for Twin Peaks (pages 27 – 28). The oil and grease exceedance occurred on January 29, 2020;

When did the City of Irving become aware of the noncompliance?

Was Twin Peaks published for SNC as a result of this exceedance?

2. The City of Mansfield's request for AFT Industries (pages 34-35)

When was the sample that detected the exceedance collected?

When did the City of Mansfield become aware of the exceedance? (Resampling should have been conducted within 30 days of the City becoming aware of the exceedance.)

Was AFT Industries published for SNC as a result of this exceedance?

Please let us know if we can be of any additional assistance.

Regards,

Randy J. Ammons, Director

North Central and West Texas Area

Texas Commission on Environmental Quality

From: Susie Harrington <harringtons@trinityra.org>

Sent: Tuesday, June 30, 2020 10:02 AM

To: molina.rudy@epa.gov; David Galindo <david.galindo@tceq.texas.gov>; Erika Crespo <Erika.Crespo@tceq.texas.gov>; Brent Candler <brent.candler@tceq.texas.gov>

Subject: Trinity River Authority of Texas - Additional Information Requested by TCEQ

Attached is the letter and attachments sent to Mr. Ramiro Garcia, Deputy Director of Compliance & Enforcement at TCEQ, regarding additional information requested by TCEQ from the June 3, 2020 conference call and June 12, 2020 email concerning the expected TPDES permit non-compliance of the Central Regional Wastewater System and the Ten Mile Creek Regional Wastewater System.

Susie Harrington

Administrative Assistant
Trinity River Authority of Texas/Northern Region
817-493-5158 / 817-465-0970 (Fax)



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