

From: [OCE](#)
To: [Hall, Raymond D](#); [OCE](#); [Ramiro Garcia](#)
Cc: [Pokluda, Michael D](#); [Bost, Michelle \(mbost@utsystem.edu\)](#); [Leadon, Linette M](#)
Subject: RE: COVID-19 Related MECT 15 Day Extension P0847 University of Texas MD Anderson Cancer Center
Date: Tuesday, March 31, 2020 10:57:00 AM
Attachments: [image001.png](#)

Mr. Hall –

The following information has been made available on the [TCEQ website](#) and should address your request for an extension. If you have any additional questions, please let us know.

Regards –
Tracy Miller
Special Assistant to the OCE Deputy Director
TCEQ

Mass Emissions Cap and Trade (MECT) and Highly Reactive Volatile Organic Compound Emissions Cap and Trade (HECT) Annual Compliance Reporting:

Per 30 TAC Sections 101.359(a) and 101.400(a), relating to the Mass Emissions Cap and Trade (MECT) Program and Highly Reactive Volatile Organic Compound Emissions Cap and Trade (HECT) Program, respectively, annual compliance reports are due by March 31 after each control period.

Due to COVID-19 and reduced staff in the workplace, TCEQ will consider 2019 annual compliance reports submitted on or before April 30, 2020 as timely received. The agency will consider additional enforcement discretion regarding this deadline as conditions warrant in response to COVID-19.

Please contact the Emissions Banking and Trading Programs at ebt@tceq.texas.gov with any questions.

From: Hall, Raymond D <RDHall@mdanderson.org>
Sent: Monday, March 30, 2020 4:54 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Pokluda, Michael D <mdpoklud@mdanderson.org>; Bost, Michelle (mbost@utsystem.edu) <mbost@utsystem.edu>; Leadon, Linette M <lmbaldwi@mdanderson.org>
Subject: COVID-19 Related MECT 15 Day Extension P0847 University of Texas MD Anderson Cancer Center

TCEQ:

This email is to request compliance and enforcement discretion of 30 TAC Chapter 11, Subchapter H, Division 3 Rule §101.359. The rule states: “(a) No later than March 31 after each control period, the owner or operator of a site subject to this division shall submit a completed annual compliance report specified by the executive director to the executive director, which must include the

following: (1) the amount of actual nitrogen oxides (NO_X) emissions from applicable facilities at the site during the preceding control period;

(2) the method of determining NO_X emissions from applicable facilities, including, but not limited to, any monitoring protocol and results, calculation methodology, level of activity, and emission factor;

(3) a summary of all final trades for the preceding control period;

(4) detailed documentation supporting the reported level of activity and emission factor for each affected facility. It is acceptable to reference documentation supporting a level of activity or an emission factor if previously submitted with an annual compliance report or level of activity certification form; and

(5) detailed documentation on NO_X emissions from each facility not subject to an emission specification under §117.310 or §117.2010 of this title (relating to Emission Specifications for Attainment Demonstration and Emission Specifications) that result from changes made after December 31, 2000, to an affected facility as required in §101.354(e) of this title (relating to Allowance Deductions).

(b) For the owner or operator of a site failing to submit an annual compliance report by the required deadline in subsection (a) of this section, the executive director may withhold approval of any proposed trades from that site involving allowances allocated for the control period for which the report is due or to be allocated in subsequent control periods.

(c) The owner or operator of a site subject to this division that no longer has authorization to operate any affected facilities may request a waiver from the reporting requirements in this section. If approved, the annual compliance report will not be required until a new affected facility is authorized at the site.”

We request a 15 day extension for the 2019 Mass Emissions Cap and Trade (MECT) Program Annual Compliance Report associated with the reporting requirements for the Texas Commission on Environmental Quality MECT for Portfolio P0847 owned and operated by the University of Texas MD Anderson Cancer Center (MD Anderson Cancer Center). MD Anderson Cancer Center has committed to protecting patients, visitors, our workforce, and the Greater Houston Area Community by implementing Coronavirus Disease 2019 (COVID-19) infection control measures in an effort to slow the pandemic spread. Some of our measures include:

- Suspended Research Facilities activities
- Opened patient and employee screening locations for possible COVID-19 infection.
- Screening patients and visitors for possible COVID-19 infection.
- We no longer allow visitors until further notice, with limited exceptions. For more details, please review our [COVID-19 information page](#).
- Beginning Wednesday, April 1, we will require mandatory 14-day self-quarantine for patients traveling from any state outside of Texas. This measure includes air and car travel, and is in addition to the 14-day quarantine we already have in place for international patients.
- Cancelling all business travel, domestic and international, for faculty and staff for eight weeks.
- Asking employees to register their personal travel and the travel of their household members with Employee Health, and to self-quarantine after travel outside of Houston.
- Limiting work gatherings and meetings to no more than 5 people with a minimum of 6 feet of distance between participants.
- Limiting the number of people in elevators in alignment with our guidelines for 5 or fewer people in an area.
- Dining locations are limited to take-out food and their seating areas closed.

- Our Hospitality Centers, the Beauty/Barber Shop, The Learning Center and the Patient Relaxation Area have all closed to reduce the potential for people gathering in close quarters.
- For patients, our skybridge shuttles are limiting each cart to 4 riders.
- Reassigning employees to support COVID-19 measures.

The incomplete, long list of measures were implemented over the course of the continued growth of the pandemic. MD Anderson's dedicated [Coronavirus Precautions Webpage](#) has more information concerning our efforts to protect our patients and workforce. These measures were implemented during a time that our Environmental Health and Safety Team normally utilizes to finalize our MECT annual compliance report. During this time, our team supported the institution by facilitating collection of biological and hazardous wastes from all of the suspended Research Facilities. We coordinated the launching of multiple COVID-19 screening locations. We updated infectious waste handling protocols for COVID-19 specific measures. We implemented alternate work schedules to meet the gathering limitations. We met other compliance reporting deadlines for NESHAP, Tier II, and the Annual Waste Summary. The 15 day extension would expire April 15, 2020. The extension will be used to finalize and submit the report.

Thank you for your consideration.

Raymond D. Hall, MSPS, CHMM

Safety Specialist

EHS, Sustainability & Emergency Management

Environmental Protection Program

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