

**From:** [Jonathan Walling](#)  
**To:** [Sarah Stephens](#)  
**Cc:** [OCE](#)  
**Subject:** COVID-19 Regulatory Relief Request for Woodville Pellets, LLC (CN605690569)  
**Date:** Wednesday, April 1, 2020 5:20:54 PM  
**Attachments:** [image001.png](#)

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Good afternoon, Ms. Stephens:

Thank you for submitting your Benchmark Monitoring Form by the due date. The TCEQ will apply enforcement discretion for the 2019 calendar year form being submitted without the required signature. This enforcement discretion will be valid until May 29, 2020. The signed signature page(s) signed by Mr. Raul Kirjanen or Mr. Rain Silivask should be submitted as additional correspondence as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please re-submit your request. A copy of this enforcement discretion approval may be submitted with the signed form(s) to document the reason for the correspondence.

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:** Sarah Stephens <[REDACTED]>  
**Sent:** Tuesday, March 31, 2020 8:54 AM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** COVID-19 Regulatory Relief Request for Woodville Pellets, LLC (CN605690569)

To Whom it May Concern,

Stormwater discharges from the Woodville Mill are authorized by Texas Pollution Discharge Elimination System (TPDES) Multi-Sector General Permit (MSGP) No. TXR05EK70. Woodville Pellets, LLC (Woodville Pellets) owns and operates the Woodville Pellet Mill. The Woodville Pellet Mill is a wood products site and conducts activities described by the following section of the MSGP: Part V. Section A: Sector A of Industrial Activity – Timber Products Facilities. The facility is, therefore, subject to benchmark monitoring requirements for chemical oxygen demand (COD) and total suspended solids (TSS). Per Part III, Section A(4)(e) of the MSGP, the Benchmark Monitoring Form is due March 31 following the calendar year in which the samples were collected. Per Part III, Section E(6)(c) of the MSGP, all reports and certifications required in this permit or otherwise requested by the executive director must be signed by the person and in the manner required by TAC §305.128

(relating to Signatories to Reports).

Woodville Pellets was able to submit the Benchmark Monitoring Form before March 31, 2020. However, due to COVID-19 quarantines, Woodville Pellets' Responsible Official (RO), Mr. Raul Kirjanen, was not able to sign TCEQ forms. Signatory authority within the company falls to Woodville Pellets' Vice President, Mr. Rain Silivask, at this time. Therefore, Woodville Pellets would like to request enforcement discretion on the signature of the Benchmark Monitoring Form for the 2019 calendar year.

Thank you for your understanding,

**Sarah Stephens**

EHS Manager

Main phone: 409-331-9823

Mobile: 409-382-2045

E-mail: [REDACTED]



164 County Road 1040, Woodville, Texas 75979

Graanul Invest group [www.graanulinvest.com](http://www.graanulinvest.com)