

**CRAIN
CATON
— & —
JAMES**

TELEPHONE: 713.658.2323
FACSIMILE: 713.425.7920
DIRECT LINE 713.752.8628

A PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS
SINCE 1912

17TH FLOOR
FIVE HOUSTON CENTER
1401 MCKINNEY STREET
HOUSTON, TEXAS 77010-4035

Kelly D. Brown
Shareholder

Email: [REDACTED]

May 10, 2016

Mr. Ramiro A. Garcia
Deputy Director
Office of Compliance and Enforcement, MC-172
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

Via Certified Mail, RRR:

Certified Article Number

9414 7266 9904 2029 2497 93

SENDER'S RECORD

Re: **Audit Corrective Action Completion**

Gulf Reduction Corporation, 6020 Esperson Street, Houston, TX 77011-2330; Audit No. 1177530 (CN600315832; RN102536562);
Gulf Reduction Corporation, 6020 Navigation Blvd., Houston, TX 77011-1132;
Audit No. 1177525 (CN600315832; RN102547064).

RECEIVED

SEP 26 2016

Dear OCE Deputy Director:

TCEQ
CENTRAL FILE ROOM

By letter dated June 18, 2014, Gulf Reduction Corporation ("GRC") submitted a notice that it intended to conduct an environmental compliance audit (the "Audit") at the captioned facility, pursuant to the Texas Environmental, Health, and Safety Audit Privilege Act (the "Act"). TCEQ granted GRC's timely request for an extension of the audit period through May 17, 2015. GRC submitted disclosures of violations under the Audit by letter dated November 13, 2015.


There were a total of four (4) disclosed violations in the referenced disclosure notice. GRC made a diligent and continuous effort to complete the corrective actions for each violation. The attached addendum reflects that GRC has completed all corrective actions before the deadline of May 13, 2016. Per TCEQ, GRC must obtain authorization from TCEQ for the permit alteration application listed in Corrective Action Item 2 before it can obtain immunity under the Audit Act. This firm will continue to keep you updated as to when TCEQ-authorization has been obtained.

If you have any questions, please contact me at 713-752-8628.

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Sincerely yours,

CRAIN, CATON & JAMES, P.C.

By: 
Kelly D. Brown

KDB/EAT/slm
Enclosure

cc: Ms. Ashley K. Wadick
Regional Director
TCEQ Houston Regional Office
Via email: ashley.k.wadick@tceq.texas.gov

Ms. Trina Grieco
Audit Act Coordinator
TCEQ Litigation Division
Via email: trina.grieco@tceq.texas.gov

3	<p>Metals Plant <u>RN102547064:</u></p> <p>Vibramill (installed 2/1/2011)</p> <p>Mixer (installed 2/1/2014)</p>	<p>30 TAC §106.8(c) 30 TAC §106.261(a)(7)</p>	<p>PBR 106.261 was not registered as required for either of these emissions units.</p>	<p>Vibramill: 4/1/2012</p> <p>Mixer: 3/1/2015</p>	<p>The Vibramill was permanently removed from the site in July 2014. Therefore, no further action required.</p> <p>For the Mixer, submit 106.261 PI-7 registration on or before November 30, 2015.</p>	<p>Complete: As of November 13, 2015, the PI-7 for 106.261 was submitted to TCEQ. This was approved in December 2015, then rolled into the permit renewal (thus, the PBR was voided) that was issued in February 2016.</p>
4	<p>Metals Plant <u>RN102547064:</u></p> <p>Emergency Generators</p>	<p>30 TAC §106.8(c)</p>	<p>Onsite documentation demonstrating the emergency generators' authorization by and compliance with PBR 106.511 could not be verified.</p> <p><u>Identification Date:</u> May 8, 2015</p>	<p>October 1, 2008</p>	<p>By November 30, 2015, develop required PBR documentation.</p>	<p>Complete: PBR documentation developed November 11, 2008.</p>