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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 3, 2010

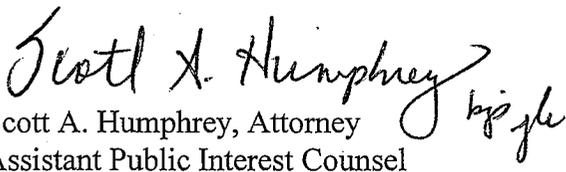
LaDonna Castañuela, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
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**RE: ABITIBI CONSOLIDATED
TCEQ DOCKET NO. 2010-1308-AIR**

Dear Ms. Castañuela:

Enclosed for filing is the Office of Public Interest Counsel's Response to Requests for Hearing in the above-entitled matter.

Sincerely,


Scott A. Humphrey, Attorney
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cc: Mailing List

Enclosure

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TCEQ DOCKET NO. 2010-1308-AIR

**IN THE MATTER OF THE
APPLICATION OF ABITIBI-
CONSOLIDATED CORPORATION
FOR RENEWAL OF PERMIT NO.
8068 AND PSDTX437**

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**BEFORE THE TEXAS
COMMISSION ON
ENVIRONMENTAL QUALITY**

**THE OFFICE OF PUBLIC INTEREST COUNSEL'S
RESPONSE TO REQUESTS FOR HEARING**

The Office of Public Interest Counsel (OPIC) of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Hearing Requests in the above-referenced matter.

I. INTRODUCTION

Abitibi-Consolidated Corporation (Abitibi or Applicant) applied to the TCEQ for renewal of Air Quality Permit No. 8068 to authorize continued operations of the Lufkin Pulp and Paper Mill located at 3331 East Highway 103 in Lufkin, Angelina County, Texas. The existing facility is authorized to emit the following air contaminants: nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM), chlorine (Cl₂), total reduced sulfur (TRS), organic compounds and carbon monoxide (CO).

This renewal application, which has a complicated procedural history, was filed on June 1, 1998. An investigator from the TCEQ Regional Office in Beaumont inspected the mill and concluded the Applicant should have its emissions from the Blowheat Recovery System (BRS) represented in the permit. The technical staff in the Air Permits Division concurred with the investigator's determination. The BRS was originally installed in the 1990's to comply with the Texas Regulation II¹ regarding emissions from kraft pulp mill digesters. The BRS in the facility

¹ Now in TCEQ Rules at 30 Texas Administrative Code (TAC) Chapter 112

included an accumulator that is equipped with a water seal that is set to approximately 3.5 pounds per square inch gauge (psig) to prevent tank and equipment ruptures. Pressure changes both internally and externally can result in the seal's being periodically compromised resulting in a release of Non-Condensable Gases (NCGs). These releases are unpredictable and highly dependent upon several factors, including atmospheric pressure and temperature changes, upsets in the digester cooking systems that result in cooking too long or not long enough, off-specification raw materials, malfunction of instruments that monitor pressures in the system and changes in control set points. Once the water seal is compromised, it can be automatically or manually reset quickly, and the resulting NCG vent typically lasts for one minute or less. The Applicant contends that emissions from this water seal are upset emissions and that it has recorded them per the instructions of 30 TAC §§ 101.201-101.211. However, during an investigation in February 2000, the Beaumont Regional Office concluded that even if the emissions are unpredictable, the frequency of occurrences makes them part of normal operations and, therefore, the emissions should be represented in the permit.

In response, the Applicant submitted an amendment application on December 18, 2000. The amendment was not regarded as an increase in emissions but rather as an authorization of existing emissions that were previously reported as upset emissions. Because the emissions could not be easily quantified, the Applicant applied two percent of the operating hours of the digester to determine the emissions.

On December 20, 2000, the Commission approved an Agreed Order² requiring the Abitibi either to certify that actual emissions from the BRS are being maintained below the emission limits specified in the Air Quality and PSD permits or to submit an application to

² TCEQ Docket No. 2000-0405-AIR-E

amend the permits to ensure that all emissions from the BRS during normal operating conditions are authorized. On October 25, 2002, Abitibi submitted a second amendment application that included a demonstration and commitment to reduce the number of blown seal incidents, thereby lowering the Applicant's requested emissions below the *de minimis* level requiring public notice.

The draft permit was sent out for comments to the TCEQ Regional Office on January 22, 2003. After an extended period of communication exchanges concerning the language contained in the special conditions, there was a meeting on July 8, 2003 that included representatives from the Air Permits Division, the TCEQ Office of Compliance and Enforcement, the Beaumont Regional Office, the TCEQ Office of Legal Services and the Applicant. The participants reached an agreement that Abitibi should submit a Compliance Assurance Plan to the TCEQ Enforcement Division. The Enforcement Division concluded Abitibi needed to put into place some corrective action plan to bring the BRS into compliance, and the plan would need to be enforceable either by inclusion in a permit or outside the permit as an extension of the December 20, 2000 ordering provision. The amendment application of October 25, 2002 was then voided on August 25, 2003. In order to be in compliance with the Agreed Order, Abitibi voluntarily stopped production or idled the mill in December 2003.

After several months of continued negotiations, the TCEQ and the Applicant came to the conclusion that because no new emissions are involved in the BRS, the Applicant could address the blown seals under a Startup, Shutdown and Malfunction (SSM) plan. For this reason, the permit was altered on November 16, 2005 to include the requirement for an SSM plan, and the Applicant requested that the December 18, 2000 amendment be withdrawn. That amendment application was voided on August 21, 2006, and all the commenters were notified by letter that day. Therefore, the remaining application is for the renewal of Air Quality Permit No. 8068.

As stated previously, Abitibi filed this renewal application on June 1, 1998. The ED declared the application administratively complete on May 14, 2001. The Notice of Receipt and Intent to Obtain an Air Quality Permit was published on May 30, 2001 in the *Lufkin Daily News*. Alternative Language Notice was published on May 30, 2001 in *La Lengua*. The Notice of Application and Preliminary Decision was published on December 5, 2001 in the *Lufkin Daily News*. Alternative Language Notice was published on December 5, 2001 in *La Lengua*. The Notice of Receipt and Intent to Obtain an Air Quality Permit was republished on April 11, 2007 in the *Lufkin Daily News*. Alternative Language Notice was republished on April 11, 2007 in *La Lengua*. The public comment period ended on April 26, 2007. No further comments or requests were received during the 15-day comment period after the republication.

In response to the notices, the TCEQ received numerous requests for a contested case hearing. Based on the information submitted in the request and a review of the information available in the Chief Clerk's file on this application, OPIC recommends denying the hearing requests due to the statutory prohibition against holding a public hearing on a "renewal that would not result in an increase in allowable emissions and would not result in the emission of an air contaminant not previously emitted."³

II. APPLICABLE LAW

The Executive Director declared this application administratively complete on May 14, 2001. As the application was declared administratively complete after September 1, 1999, a person may request a contested case hearing on the application pursuant to the requirements of Texas Health & Safety Code ("THSC") section 382.056 and Texas Water Code ("TWC")

³ Tex. Health and Safety Code § 382.056(g) (2006).

Chapter 5, Subchapter M, Environmental Permitting Procedures, section 5.556 added by Acts 1999, 76th Leg., ch. 1350 (commonly known as "House Bill 801").

Under the applicable statutory and regulatory requirements, a hearing request must substantially comply with the following: give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request; identify the requester's personal justiciable interest affected by the application showing why the requestor is an "affected person" who may be adversely affected by the proposed facility or activity in a manner not common to members of the general public; request a contested case hearing; list all relevant and material disputed issues of fact that were raised during the comment period that are the basis of the hearing request; and provide any other information specified in the public notice of the application. 30 TEXAS ADMIN. CODE ("TAC") § 55.201(d). Hearing requests must be submitted to the Chief Clerk's Office in writing no later than 30 days after the Chief Clerk's transmittal of the Executive Director's Response to Comments. 30 TAC § 55.201(c).

Under 30 TAC section 55.203(a), an "affected person" is "one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application." This justiciable interest does not include an interest common to the general public. *Id.* Relevant factors that will be considered in determining whether a person is affected include:

- (1) whether the interest claimed is one protected by the law under which the application will be considered;
- (2) distance restrictions or other limitations imposed by law on the affected interest;
- (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
- (4) likely impact of the regulated activity on the health, safety, and use of property of the person;
- (5) likely impact of the regulated activity on use of the impacted natural resource by the person; and

- (6) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

30 TAC § 55.203(c).

The Commission shall grant an affected person's timely filed hearing request if: (1) the request is made pursuant to a right to hearing authorized by law; and (2) the request raises disputed issues of fact that were raised during the comment period and that are relevant and material to the Commission's decision on the application. 30 TAC § 55.211(c).

Accordingly, responses to hearing requests must specifically address:

- (1) whether the requestor is an affected person;
- (2) which issues raised in the hearing request are disputed;
- (3) whether the dispute involves questions of fact or law;
- (4) whether the issues were raised during the public comment period;
- (5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the Chief Clerk prior to the filing of the Executive Director's Response to Comment;
- (6) whether the issues are relevant and material to the decision on the application; and
- (7) a maximum expected duration for the contested case hearing.

30 TAC § 55.209(e).

III. DISCUSSION

A. A Right to Hearing Does Not Exist on Abitibi's Renewal Application because the Renewal Will Not Result in an Increase in Allowable Emissions or the Emission of an Air Contaminant Not Previously Emitted.

As an initial matter, the Commission must determine whether a right to a contested case hearing exists on this application. No right to a contested case hearing exists on a renewal application under Chapter 382 of the Texas Health and Safety Code if the application would not result in an increase in allowable emissions and would not result in the emission of an air

contaminant not previously emitted.³ However, notwithstanding THSC section 382.055(g), the Commission may hold a hearing on a permit renewal "if the commission determines that the application involves a facility for which the applicant's compliance history is in the lowest classification under Section 5.753 and 5.754, Water Code, and rules adopted and procedures developed under those sections."⁴ TCEQ rules allow the Commission to hold a contested case hearing in the following circumstance: "if the application involves a facility for which the applicant's compliance history contains violations which are unresolved and which constitute a recurring pattern of egregious conduct which demonstrates a consistent disregard for the regulatory process, including the failure to make a timely and substantial attempt to correct the violations."⁵

Based on the technical review, the Executive Director's RTC, and the public notice, OPIC concludes that the renewal will not result in increased allowable emissions or the emission of an air contaminant not previously emitted. With regard to the Applicant's compliance history, a review of the components was conducted.⁶ The company has an average compliance history (site rating of 1.69 and company rating of 0.73) with no recurring pattern of conduct that demonstrates consistent disregard for the regulatory process. As a result, OPIC cannot recommend that a right to hearing exists based on the Applicant's compliance history.

Therefore, based on a review of the criteria set forth in THSC section 382.056(g) and (o), OPIC concludes that there is no right to a hearing on this renewal application. In the event the Commission disagrees, the OPIC offers the following analysis set forth below.

³ Tex. Health & Safety Code (hereinafter "THSC") § 382.056(g), (o); 30 TAC §§ 55.201(i)(3)(C); 55.211(d)(2).

⁴ THSC § 382.056(o).

⁵ 30 TAC § 55.201(i)(3)(C); *see also* 30 TAC § 55.211(d)(2).

⁶ Pursuant to 30 TAC Chapter 60, as the permit renewal application was received prior to September 1, 2002

B. Affected Person Analysis

The Commission received the same form letter requesting a contested case hearing from the following: Johnny Arney; Jo Ellen Atkinson; Dian Avriett; F. Avriett; Fenner Avriett; Jay Avriett; Louis W. Cable; Dr. Mary Jane W. Cable; Bonnie Donovan; Gina Donovan; R. Donovan; Richard M. Donovan; Susana Encarnacion; the Griggs Family; Jerry Ferguson; Juanita Gandy; Faye Griggs; James Griggs; Deadra Johnson; Cary Kirby; Gaylyn Kirby; Jimmy Laird; James & Kerry Lemon; Kerry Bryant Lemon; Helen Madden; Sammy L. Madden; Roy C. McRoskey; David Melton; Denial Orta; Sara Ortega; Dusty Rhodes; Julia Robles; Carmen Rogue; Sandra Rummer; Heather Seay; Kim Seay; William B. Shelton, Jr.; Donna Stanley; Dwayne Sumrall; Mary Taylor; Tanya Thompson; Norma O. Tousha; and Rachael Woodson. If a right to hearing were to exist on this application, OPIC could not conclude that any of the hearing requesters are affected persons based on the information in the hearing requests.

As the hearing requesters are using a form letter, they raise several important issues, but not one requester describes where he or she lives in relationship to the facility. Without knowing the proximity of the hearing requesters' residences to the proposed facility, OPIC cannot determine whether they are "affected persons" entitled to a contested case hearing.⁷ As a result, OPIC cannot conclude that the hearing requesters have raised issues that are not common to the general public. If, however, the Commission determines that there is a right to hearing and that any or all of the hearing requesters are affected persons entitled to a contested case hearing, OPIC provides the following analysis of the issues raised in the hearing requests.

⁷ 30 TAC § 55.203(a)(2), (4) & (5).

C. Issues Analysis

The hearing requests collectively raise the following issues:

- (1) Are the levels and the character of emissions appropriate for this facility;
- (2) Is the proposed permit protective of human health, including the most sensitive parts of the population;
- (3) Does the proposed permit employ Best Available Control Technology (BACT);
- (4) Will the facility's proposed facility create nuisance odors;
- (5) Should the facility's compliance history warrant denial of the renewal;
- (6) Is the proposed facility compliant with applicable federal standards; and
- (7) Will the proposed permit impact water quality?

1. The Hearing Requesters raise issues disputed by the parties.

No agreement exists between the parties on the issues discussed above. In the ED's Response to Comments (RTC), the ED replies that the pollutants from this plant are the same pollutants as those from other pulp and paper mills in the United States.⁸ The ED also asserts that since this was a renewal and not an application to increase emissions, no review was warranted at this time regarding health affects or BACT.⁹ The ED notes that if the facility is operated in conformity with the provisions of the permit, no nuisance odor is expected.¹⁰ The ED also states that the Applicant's renewal should not be denied based on compliance history because the Applicant's compliance history is average.¹¹ The ED additionally responds that this facility already has a Prevention of Significant Deterioration (PSD) permit, and no further PSD review is required since this renewal does not increase net emissions.¹²

⁸ RTC Response No. 1

⁹ RTC Response Nos. 2 & 3

¹⁰ RTC Response No. 5

¹¹ RTC Response No. 6

¹² RTC Response No. 9

2. The Hearing Requesters raise issues of fact.

The requesters raise specific factual issues in their hearing requests about the Applicant's levels of emissions, impacts on human health, BACT, nuisance odors, federal requirements and compliance history. These are issues of fact, rather than issues of law or policy, and are appropriate for referral to hearing.¹³

3. The Hearing Requesters raise issues similarly raised in comments on the application.

The hearing requesters filed their requests for hearing during the public comment period. The Executive Director appears to have based his Response to Comments on the issues raised in the hearing requests. The issues that were raised during the comment period have not been withdrawn. Therefore, the issues raised in the hearing request were also raised during the public comment period.¹⁴

4. The issues raised regarding levels of emissions, impacts on human health, BACT, nuisance odors federal requirements and compliance history are relevant and material to the Commission's decision on this application.

The hearing request raises issues which are relevant and material to the Commission's decision on this application under the requirements of 30 TAC sections 55.201(d)(4) and 55.211(c)(2)(A). Aside from the issues raised related to impacts on water quality (issue no. 7 *supra*), the factual issues raised by the hearing requesters relate directly to whether the applicant will meet the requirements of applicable substantive law.¹⁵

¹³ 30 TAC § 55.211(b)(3)(A), (B).

¹⁴ 30 TAC §§ 55.201(c), (d)(4); 55.211(c)(2)(A).

¹⁵ See *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248-251 (1986) (in discussing the standards applicable to reviewing motions for summary judgment the Court stated the following: "[a]s to materiality, the substantive law

5. If the Commission were to refer this matter to SOAH, OPIC recommends that the Commission refer the issues regarding levels of emissions, impacts on human health, BACT, nuisance odors, compliance with federal standards and compliance history.

In light of the requirements of 30 TAC sections 50.115(b) and 55.211(b)(3)(A)(i), OPIC recommends that any referral to the State Office of Administrative Hearings ("SOAH") include the following issues:

- (1) Are the levels and character of emissions appropriate for this facility?
- (2) Will the proposed renewal adversely impact human health?
- (3) Is the facility employing BACT?
- (4) Will the facility be in compliance with all state and federal standards?
- (5) Does the Applicant's compliance history warrant denial of the renewal?

D. If this matter is referred to hearing, OPIC Estimates that the Maximum Expected Duration of Hearing will be Nine Months.

Commission rule 30 TAC section 50.115(d) requires that any Commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides that no hearing shall proceed longer than one year from the first day of the preliminary hearing to the date the proposal for decision is issued. In assisting the Commission to state a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC section 55.209(e)(7), OPIC estimates that the maximum expected duration of hearing on this application

will identify which facts are material...it is the substantive law's identification of which facts are critical and which facts are irrelevant that governs.")

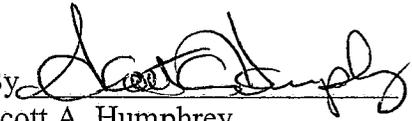
would be nine months from the first date of the preliminary hearing until the proposal for decision is issued.

IV. CONCLUSION

For the reasons set forth above, the Office of Public Interest Counsel respectfully recommends that the Commission find that no right to a hearing exists on this application for renewal of an air permit that does not authorize an increase in allowable emissions or the emission of a new contaminant. However, if the Commission finds that a right to hearing exists on this application, OPIC cannot find that any of the hearing requesters are affected persons based on the information provided in the form hearing request. If the Commission finds that there is a right to a hearing and that any or all hearing requesters are affected persons entitled to a contested case hearing, then OPIC recommends granting the contested case hearing requests of the individuals listed above and refer this matter to the State Office of Administrative Hearings for a hearing on the issues described above.

Respectfully submitted,

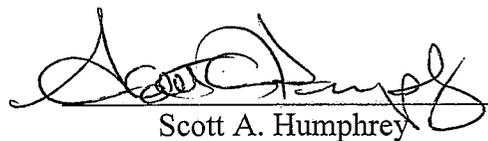
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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2010 the original and seven true and correct copies of the foregoing were filed with the Chief Clerk of the TCEQ and a copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, other electronic transmission, Inter-Agency Mail or by deposit in the U.S. Mail.


Scott A. Humphrey

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