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March 26, 2014

BRIDGET BOHAC, CHIEF CLERK
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
OFFICE OF THE CHIEF CLERK (MC 105)
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087

VIA FAX No. 512-239-3311
AND REGULAR MAIL

Re: **CITGO REFINING AND CHEMICALS COMPANY, LP**
TCEQ DOCKET NO. 2013-2078-AIR

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2014 MAR 26 PM 1:55
CHIEF CLERK'S OFFICE

Dear Ms. Bohac:

Enclosed for filing in the above referenced matter is Citizens for Environmental Justice's Reply to Executive Director's Response to Hearing Requests.

Please contact me at the number above if you have any questions regarding this filing.

Sincerely,

Enrique Valdivia
Attorney at Law

cc: Service List

TCEQ AIR QUALITY PERMIT NO. 80693

**APPLICATION BY
CITGO REFINING AND CHEMICALS
COMPANY, L.P.
CITGO CORPUS CHRISTI
REFINERY EAST PLANT
STORAGE TANKS
NUECES COUNTY TEXAS**

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**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

CHIEF CLERK'S OFFICE

2014 MAR 26 PM 1:58

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

**CITIZENS FOR ENVIRONMENTAL JUSTICE'S REPLY
TO EXECUTIVE DIRECTOR'S RESPONSE TO
HEARING REQUESTS**

TO THE HONORABLE COMMISSIONERS OF THE TCEQ:

Citizens for Environmental Justice (CFEJ) through its attorney Texas Rio Grande Legal Aid, files this response to the Executive Director's recommendations in the above referenced case.

Citizens for Environmental Justice (CFEJ), is a grassroots environmental organization based in Corpus Christi Texas. CFEJ works in collaboration with it's members who are residents living near the "Refinery Row" area of Corpus Christi, including the Hillcrest and Dona Park neighborhoods, to promote the goal of environmental justice for their community. Applicant's facility is one of many such facilities located in Refinery Row. Many individual members of CFEJ are affected persons in that they live, work or own property within close proximity to Applicant's facility. CFEJ members thus have higher risks of exposure to the facility's emissions than the general public and are concerned about the effect of Citgo's emissions on their health. Members of CFEJ routinely see emissions from the Citgo facility and smell odors from the facility. When odors from the facility are bad, they have been forced to close their windows and curtail their outdoor activities. In addition, CFEJ members have experienced the fires and evacuations resulting from emission incidents at the Citgo's refinery and are concerned about company's maintenance practices.

Further, members of CFEJ, including Mrs. Jean Salone, Mrs. Peggy Wimbish, and Mrs. Connie Gonzalez are victims of Citgo's past Clean Air Act criminal violations related to the

company's mismanagement of its tanks. These members have filed victim impact statements with the federal court, and Mrs. Salone and Mrs. Gonzalez testified as victims in Citgo's criminal trial.

Many CFEJ members live in close proximity to the plant, including members that live in the Hillcrest neighborhood less than a mile from the facility. Ms. Jean Salone, resides at 2821 Nueces, Corpus Christi Texas 78407. Ms. Salone's telephone number is 361-882-7828. Mr. Rueben Washington resides at 2823 Hulbirt, Corpus Christi Texas 78407. His telephone number is 361-883-6720. Ms. Debbie Harmon resides at 2821 Hulbirt, Corpus Christi Texas 78407. Her telephone number is 361-882-9120. Ms. Peggy Wimbish, resides at 2420 Dempsey, Corpus Christi Texas 78407. All these residences are less than one mile of the Applicant's facility. Because of the location of their residences in close proximity to the facility these CFEJ members face risks of harmful exposure to emissions from Applicant's facility greater than and distinct from the general public's.

CFEJ's Executive Director, Ms. Suzie Canales, owns property in the Hillcrest neighborhood at 1801 Peabody, Corpus Christi, Texas. Her phone number is 361-429-5341. Kelly Arkadie, owns property at 1705 Van Loan, & 2801 Kennedy, Corpus Christi Texas 78407. Kelly Arkadie's telephone number is 361-854-4105. Ms. Canales and Mr. Arkadie's properties are less than one mile of the Applicant's facility. Because their properties are in such close proximity to the facility and its harmful emissions Ms. Canales and Mr. Arkadie face risks of economic loss greater than and distinct from the general public's.

In addition, the following members of CFEJ live in the Dona Park neighborhood, within approximately a mile and a half of the Citgo facility. Tammy Foster lives at 1118 Vernon Drive, Corpus Christi Texas. Her phone number is 361-688-3666. Jeannine Foster owns the property at 1118 Vernon Drive, Corpus Christi Texas. Her phone number is 361-855-8050. Connie and Polo Gonzalez own the property at 1214 Vernon Drive, Corpus Christi Texas.

Their phone number is 361-289-0021.

CFEJ has numerous members who reside within close proximity to the Citgo facility and who have been and continue to be affected by emissions and odors from the plant and by emission events and emergencies at the plant. And seeking a contested case to ensure that Citgo's emissions, including those from its tanks and from related startup, shutdown and maintenance activities, are minimized furthers the organization's mission, CFEJ, therefore, has standing to request a contested case hearing in this case.

WHEREFORE, PREMISES CONSIDERED, CFEJ respectfully prays that its request for contested case hearing be granted and that it be further granted party status in that proceeding.

Respectfully submitted,



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ATTORNEYS FOR CITIZENS FOR
ENVIRONMENTAL JUSTICE

CERTIFICATE OF SERVICE

On the 26 th day of March, 2014, true and correct copies of the foregoing instrument were served on all persons on the attached mailing list by the undersigned via deposit into the U.S. Mail, facsimile, electronic mail, and/or hand delivery.



ENRIQUE VALDIVIA

MAILING LIST
CITGO REFINING AND CHEMICALS COMPANY, LP
DOCKET NO. 2013-2078-AIR; PERMIT NO. 80693

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FACSIMILE

Date: March 26, 2014

Bridget Bohac, Chief Clerk

To: TCEQ - Office of the Chief Clerk Fax: (512) 239-3311
(MC 105)

From: Enrique Valdivia Fax: (210) 212-3774

Pages: 7

Re: File 03-174021 Jean Salone

Original	to	follow:	<input type="checkbox"/>	<input type="checkbox"/>
Yes			No	X

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
 2014 MAR 26 PM 1:55
 CHIEF CLERK'S OFFICE

MESSAGE: Please see attached.

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