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*Vic McWherter, Public Interest Counsel*

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 16, 2015

Bridget Bohac, Chief Clerk  
Texas Commission on Environmental Quality  
Office of the Chief Clerk (MC-105)  
P.O. Box 13087  
Austin, Texas 78711-3087

**RE: PORT OF CORPUS CHRISTI AUTHORITY OF NUECES COUNTY  
TCEQ DOCKET NO. 2015-1488-AIR**

Dear Ms. Bohac:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Garrett Arthur", written over a horizontal line.

Garrett Arthur, Attorney  
Assistant Public Interest Counsel

cc: Mailing List

Enclosure



**DOCKET NO. 2015-1488-AIR**

<b>APPLICATION BY</b>	<b>§</b>	<b>BEFORE THE</b>
<b>PORT OF CORPUS CHRISTI</b>	<b>§</b>	
<b>AUTHORITY OF NUECES</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>COUNTY TO RENEW AIR</b>	<b>§</b>	
<b>PERMIT NO. 47881/NE0095E</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>

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

**To the Members of the Texas Commission on Environmental Quality:**

The Office of Public Interest Counsel (OPIC) at the Texas Commission on Environmental Quality (TCEQ) files this response to the hearing requests in the above-captioned matter.

**I. Background**

On July 3, 2012, the Port of Corpus Christi Authority of Nueces County (POCCA or Applicant) applied to TCEQ to amend and renew the air permit for the existing bulk material handling facility located at 4820 East Navigation Boulevard. The POCCA application was subsequently divided into two separate permitting actions, one for the amendment, and one for the renewal. The amendment, which was not subject to public notice, was issued February 27, 2015. The renewal is the permitting action now pending before the Commission.

The application was declared administratively complete on July 12, 2012, and the "Notice of Receipt of Applications and Intent to Obtain Air Permit Amendment and Renewal" was published August 10, 2012 in the *Corpus Christi Caller-Times*. After the amendment and renewal were separated, the notice was amended and republished as

the “*Amended Notice of Receipt of Application and Intent to Obtain Air Permit Renewal*” on May 19, 2015 in the *Corpus Christi Caller-Times*. The public comment period closed June 3, 2015, and the Executive Director’s (ED) Response to Comments (RTC) was mailed August 21, 2015. The deadline to request a contested case hearing was September 21, 2015.

The TCEQ received 66 timely hearing requests in this matter.<sup>1</sup> However, OPIC finds that no right to a hearing exists in this matter, and respectfully recommends the Commission deny all of the hearing requests.

## **II. Applicable Law**

This application was declared administratively complete after September 1, 1999, and is therefore subject to the procedural requirements adopted pursuant to House Bill 801 (76th Leg., 1999).

Under Title 30, Texas Administrative Code (TAC) § 55.201(d), a hearing request must substantially comply with the following:

- (1) give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;

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<sup>1</sup> For a complete list of all hearing requestors, please see the attached mailing list.

- (4) list all relevant and material disputed issues of fact that were raised during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the executive director's responses to comments that the requestor disputes and the factual basis of the dispute and list any disputed issues of law or policy; and
- (5) provide any other information specified in the public notice of application.

Under 30 TAC § 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. An interest common to members of the general public does not qualify as a personal justiciable interest. Section 55.203(c) provides relevant factors to be considered in determining whether a person is affected. These factors 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.

As provided by 30 TAC § 55.205(a), a group or association may request a contested case hearing only if the group or association meets all of the following requirements:

- (1) one or more members of the group or association would otherwise have standing to request a hearing in their own right;
- (2) the interests the group or association seeks to protect are germane to the organization's purpose; and

- (3) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

Under 30 TAC § 55.211(c)(2), a hearing request made by an affected person shall be granted if the request:

- (A) raises disputed issues of fact that were raised during the comment period, that were not withdrawn by the commenter by filing a withdrawal letter with the chief clerk prior to the filing of the executive director's response to comment, and that are relevant and material to the commission's decision on the application;
- (B) is timely filed with the chief clerk;
- (C) is pursuant to a right to hearing authorized by law; and
- (D) complies with the requirements of § 55.201.

### **III. Analysis of Hearing Requests**

#### **A. Right to Hearing**

The Commission must first decide whether the right to a hearing exists for this renewal application. Under the Texas Clean Air Act (TCAA), the Commission may not hold a 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.<sup>2</sup> According to the application, technical review, and proposed permit, POCCA would not be authorized to increase the quantity of allowable air emissions, and would not be authorized to emit any air contaminant not previously emitted.

However, the TCCA further provides that 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 classified as unsatisfactory under Texas Water Code (TWC) §§ 5.753 and 5.754 and rules adopted and procedures developed

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<sup>2</sup> TEX. HEALTH & SAFETY CODE § 382.056(g).

under those sections.<sup>3</sup> The rules adopted under TWC §§ 5.753 and 5.754 state that the Commission may hold a hearing if the application involves a facility for which the applicant's compliance history contains violations that are unresolved and that constitute a recurring pattern of egregious conduct that demonstrates a consistent disregard for the regulatory process, including the failure to make a timely and substantial attempt to correct the violations.<sup>4</sup> According to the TCEQ compliance history database, POCCA and the bulk terminal both have a "Satisfactory" compliance history rating. Given the "Satisfactory" ratings, OPIC finds that POCCA's compliance history does not trigger the statutory or regulatory compliance history exception and thereby create the opportunity for a hearing in this matter.

Based on OPIC's review of the application, the staff technical review, and the proposed permit, we first find that POCCA's renewal would not result in an increase in allowable emissions and would not result in the emission of an air contaminant not previously emitted. Second, we find that POCCA's compliance history does not trigger an exception to the hearing prohibition. Therefore, OPIC must conclude under TCAA §382.056(g) that no right to a hearing exists in this matter. For this reason, OPIC respectfully recommends the Commission deny all of the hearing requests. If the Commission decides to consider whether the Requestors are affected persons who have raised relevant and material issues, OPIC offers the following additional analysis.

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<sup>3</sup> TEX. HEALTH & SAFETY CODE § 382.056(o).

<sup>4</sup> See 30 TAC §§ 55.201(i)(3)(D), 55.211(d)(2).

**B. Whether the requestor is an affected person**

The hearing requests in this matter can be grouped into three categories. First are the 50 form letter requests. These hearing requests were all submitted using the same form letter. Second is the joint hearing request from five environmental groups. This request was submitted and signed by Environmental Integrity Project (EIP), Sustainable Energy and Economic Development (SEED) Coalition, Public Citizen, Sierra Club, and Citizens for Environmental Justice (CFEJ). Third are the non-form letter requests. These varying individual requests were submitted without using the form letter.

Form Letter Requests

The form letter hearing requests were submitted by the following persons:

Christine Adams	Patricia Gardiner	Inge Moorman
Jennifer Beck	Dona General	Becky Moreno
Julie Beers	Thomas Graf	Jerry Niles
Howard Bishop	Judy Hales	Valerie Noe
Jennifer Bray	Roxane Iglesias	Edward Orta
Diane Carroll	Howard Karsh	Sharon Purcell
Doris Cole	Joshua Karsh	Mary Pyrek
Ernesto Contreras	Ariana Klugiewicz	Tom Reissig
Jack Cooper	Bailey Landress	Karen Ruth
Eugene Desjardins	Julia Landress	Lorraine Stehn
Peggy Duran	Patricia Lewis	Marquita Tanner
Henry Els	Analilia Lopez	Eliseo Venecia
Melanie Flores	Eve Lopez	James White
Sylvia Flores	Kris Miller	Kelly Whitford
Andrew Frankum	Shauna Mondragon	Alfred Williams
Ann Fuentez	Russell Montgomery	Ashley Winkler
Stephen Gambill	Anna Moore	

The form letter hearing requestors are all concerned about health effects, air pollution, specifically particulate matter (PM) emissions, and the cumulative impacts of air emissions from POCCA, oil refineries, and other industries in the area. While none

of the form letter requestors have stated their location and distance relative to the facility, OPIC understands from available information that Melanie Flores resides approximately one mile from the facility.

Melanie Flores' interest in air quality is protected by the TCAA—the law under which this application will be considered.<sup>5</sup> Further, a reasonable relationship exists between air quality and the regulation of the POCCA bulk terminal.<sup>6</sup> Finally, Ms. Flores' proximity to the facility increases the likelihood that it will impact her health, safety, or use of property.<sup>7</sup> After applying the 30 TAC § 55.203(c) affected person factors, OPIC finds that Melanie Flores could qualify as an affected person.

Regarding the remaining form letter requestors, OPIC understands that none of them reside in close proximity to the facility. The intervening distances between their residences and the facility diminishes the likelihood that it will impact their health, safety, or use of property.<sup>8</sup> The intervening distances also make it difficult to distinguish their interests from those interests common to the general public.<sup>9</sup> By rule, each of the form letter requestors must show that he or she is an affected person who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application and distinguish that interest from an interest common to the general public.<sup>10</sup> They have not done so, and therefore, OPIC cannot find that any of the form letter requestors, except Melanie Flores, would qualify as affected persons in this matter.

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<sup>5</sup> See 30 TAC § 55.203(c)(1).

<sup>6</sup> See 30 TAC § 55.203(c)(3).

<sup>7</sup> See 30 TAC § 55.203(c)(4).

<sup>8</sup> *Id.*

<sup>9</sup> See 30 TAC § 55.203(a).

<sup>10</sup> *Id.*

Joint Environmental Group Hearing Request

The joint environmental group hearing request was submitted by Sierra Club, CFEJ, EIP, SEED Coalition, and Public Citizen. A group or association may request a contested case hearing only if one or more members of the group or association would otherwise have standing to request a hearing in their own right.<sup>11</sup> The joint hearing request states that Tammy Foster is a member of CFEJ and Sierra Club. Tammy Foster is the only member named for any of the organizations. Given that EIP, SEED Coalition, and Public Citizen do not provide a member who could qualify those groups as affected persons, OPIC must find that EIP, SEED Coalition, and Public Citizen would not qualify as affected persons in this matter.

Regarding Tammy Foster, the hearing request provides her address and states that her residence is located directly across the ship channel from Bulk Dock 1. OPIC estimates the distance between Ms. Foster's residence and the facility to be less than one mile. Ms. Foster believes the facility will negatively impact her use and enjoyment of her home and property. Tammy Foster's interest in air quality is protected by the TCAA—the law under which this application will be considered.<sup>12</sup> Further, a reasonable relationship exists between air quality and the regulation of the POCCA bulk terminal.<sup>13</sup> Finally, Ms. Foster's proximity to the facility increases the likelihood that it will impact her health, safety, or use of property.<sup>14</sup> After applying the 30 TAC § 55.203(c) affected person factors, OPIC finds that Tammy Foster would qualify as an affected person.

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<sup>11</sup> 30 TAC § 55.205(a)(1).

<sup>12</sup> See 30 TAC § 55.203(c)(1).

<sup>13</sup> See 30 TAC § 55.203(c)(3).

<sup>14</sup> See 30 TAC § 55.203(c)(4).

OPIC also finds the interests that CFEJ and Sierra Club seek to protect are germane to those organizations' purposes, and neither the claim asserted nor the relief requested requires the participation of the individual members in this case.<sup>15</sup> Having found that Tammy Foster, a member of CFEJ and Sierra Club, would qualify as an affected person, and that CFEJ and Sierra Club otherwise satisfy the requirements for group standing, OPIC concludes that CFEJ and Sierra Club could qualify as affected persons in this case.

*Non-Form Letter Hearing Requests*

Eleven people submitted individual hearing requests without using the form letter. These requestors are: Eva Castille, Nick Fye, Meggan Houlihan, Alexandria Klaas, Aixa Laventura, Pilar Longoria, Carolyn Moon, Gerald Sansing, Douglas Sherman, Stants Sherman, and C.Z. Their concerns include air quality and health effects.

OPIC understands that none of these requestors reside in close proximity to the facility, and OPIC will therefore analyze their requests collectively. The intervening distances between their residences and the facility diminishes the likelihood that it will impact their health, safety, or use of property.<sup>16</sup> The intervening distances also make it difficult to distinguish their interests from those interests common to the general public.<sup>17</sup> By rule, each of these requestors must show that he or she is an affected person who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application and distinguish that interest from an

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<sup>15</sup> See 30 TAC § 55.205(a).

<sup>16</sup> See 30 TAC § 55.203(c)(4).

<sup>17</sup> See 30 TAC § 55.203(a).

interest common to the general public.<sup>18</sup> None have done so, and therefore, OPIC cannot find that any of the non-form letter requestors would qualify as affected persons in this matter.

**C. Which issues raised in the hearing requests are disputed**

All of the issues raised in the hearing requests are disputed.

**D. Whether the dispute involves questions of fact or of law**

All of the disputed issues involve questions of fact.

**E. Whether the issues were raised during the public comment period**

All of the issues were raised during the public comment period.

**F. Whether the hearing requests are based on issues raised solely in a public comment which has been withdrawn**

The hearing requests are not based on issues raised solely in a public comment which has been withdrawn.

**G. Whether the issues are relevant and material to the decision on the application**

The amendment of POCCA's permit is complete, and that action is not before the Commission. Only the renewal of POCCA's permit is currently pending before the Commission. The requestors raised several issues which are specific to the prior amendment, and therefore, not relevant and material to the current renewal. Such amendment issues are not discussed below. The following issues would be relevant and material to the Commission's consideration of the renewal application.

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<sup>18</sup> *Id.*

### Air Quality

Under the Texas Clean Air Act, the Commission may issue this permit only if it finds no indication that the emissions from the facility will contravene the intent of the Texas Clean Air Act, including protection of the public's health and physical property.<sup>19</sup> Further, the purpose of the Texas Clean Air Act is to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare, and physical property.<sup>20</sup> Therefore, air quality is an issue which would be relevant and material to the Commission's decision on this application.

### Health Effects

Requestors have raised the issue of health effects resulting from Applicant's emissions. The Texas Clean Air Act is intended to protect public health and general welfare.<sup>21</sup> The issue of health effects would therefore be relevant and material to the Commission's decision on this application.

## **IV. Conclusion**

Under the Texas Clean Air Act, the Commission may not hold a hearing on a permit renewal application that would not result in an increase in allowable emissions and would not result in the emission of an air contaminant not previously emitted.<sup>22</sup> Based on OPIC's review of the available record, we find that POCCA's application qualifies for this statutory prohibition, and therefore, no hearing right exists in this case. OPIC respectfully recommends the Commission deny all hearing requests.

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<sup>19</sup> See TEX. HEALTH & SAFETY CODE § 382.0518(b)(2).

<sup>20</sup> See TEX. HEALTH & SAFETY CODE § 382.002(a).

<sup>21</sup> *Id.*

<sup>22</sup> TEX. HEALTH & SAFETY CODE § 382.056(g).

OPIC is not recommending a hearing. However, if the Commission decides to consider affected persons and referable issues, we find that Melanie Flores, CFEJ, and Sierra Club could qualify as affected persons. As discussed above, air quality and health effects are relevant and material issues that could be referred for hearing.

Respectfully submitted,

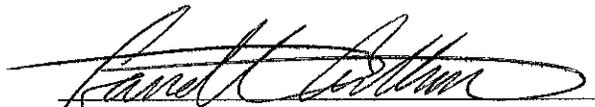
Vic McWherter  
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By 

Garrett T. Arthur  
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## CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2015, the foregoing document was filed with the TCEQ Chief Clerk, and copies were served to all parties on the attached mailing list via hand delivery, facsimile transmission, electronic mail, inter-agency mail, or by deposit in the U.S. Mail.



Garrett T. Arthur



**MAILING LIST**  
**PORT OF CORPUS CHRISTI AUTHORITY OF NUECES COUNTY**  
**TCEQ DOCKET NO. 2015-1488-AIR**

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