

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 27, 2010

Ms. LaDonna Castañuela, Chief Clerk
Office of the Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087, MC-105
Austin, Texas 78711-3087

Re: In the matter of the Application of Genan, Inc for scrap tire storage site and scrap tire facility in Harris County, Texas, Registration No. 6200673. TCEQ Docket No. 2010-1886-MIS.

Dear Ms. Castañuela:

Enclosed for filing are the original and seven copies of the Executive Director's Response to Citizens for Responsible Recycling's Motion to Overturn.

If you have any questions, please call me at (512) 239-0608.

Sincerely,

A handwritten signature in black ink, appearing to read "RON OLSON".

Ron M. Olson
Staff Attorney
Environmental Law Division

Enclosure

cc: Mailing List

TCEQ DOCKET NO. 2010-1886-MIS

IN THE MATTER OF THE	§	BEFORE THE TEXAS COMMISSION
APPLICATION OF	§	
GENAN, INC. FOR SCRAP	§	
TIRE STORAGE SITE AND	§	ON
SCRAP TIRE FACILITY IN	§	
HARRIS COUNTY, TEXAS,	§	
REGISTRATION NO.	§	
6200673.	§	ENVIRONMENTAL QUALITY

THE EXECUTIVE DIRECTOR'S RESPONSE TO CITIZENS FOR RESPONSIBLE RECYCLING'S MOTION TO OVERTURN

TO THE HONORABLE MEMBERS OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY:

COMES NOW, the Executive Director (ED) of the Texas Commission on Environmental Quality (TCEQ or Commission), and files this Response to Citizens for Responsible Recycling's (CRR) Motion to Overturn the Executive Director's issuance of a scrap tire storage and processing facility registration to Genan, Inc.

I. Background

On November 16, 2009, Genan, Inc. (Applicant) submitted an application to transport, store and process scrap tires. Although the Commission's rules provide separate types of registrations for these activities, the application addressed the requirements for all of these activities, and it was reviewed for compliance with the rules for each type of activity. The proposed processing and storage site is to be located at 18038 Beaumont Highway in Houston, Harris County, Texas. Notice of the application was published in *The North Channel Sentinel*, a newspaper of general circulation in Harris County, on November 19, 26, and December 3, 2009. Notice was also published in *The Houston Chronicle*, a newspaper of general circulation in Harris County and all adjacent counties, on February 14, 21, and 28, 2010. After the initial review of the application, the Executive Director issued a Notice of Deficiency (NOD) letter on February 26, 2010 requiring the Applicant to submit additional information. On August 7, 2010, the Applicant mailed a revised copy of its application to Houston-Galveston Area Council, the Mayor of Houston, and the Harris County Judge. On August 9, 2010,

the Applicant provided the ED with the requested information. After review of all the information, the Executive Director determined that it met all registration application requirements and approved the registration on October 28, 2010. Following the Executive Director's approval of the registration, a Motion to Overturn (MTO) was filed by the Citizens for Responsible Recycling on November 22, 2010. Although the MTO is unclear on which parts of the registration are being challenged, the ED interpreted the MTO to be challenging the parts of the registration authorizing processing and storage of scrap tires based on the rules cited. For the reasons discussed below, the Executive Director recommends that the Motion to Overturn be denied.

II. CRR lacks standing to file a motion to overturn.

The TCEQ rules state that a person affected by a registration issued pursuant to Chapter 328 may file a Motion to Overturn.¹ CRR claims it is an affected person and has standing to file its MTO because one of its members lives within five miles of the proposed facility and is concerned about the impact the facility may have on his health and safety and the use of his property. Although an 'affected person' is not defined in Chapter 328 or 330, it is defined for other applications in Chapter 55. Section 55.103 of the Commission rules states that an affected person is "a person 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."²

CRR does not provide the name or address of the person it claims provides it with affected person status. No specific information was provided to show how this individual has a justiciable interest that is not common to the general public. CRR's arguments cited in its MTO are all issues that are common to the general public. No allegations cited in the MTO establish a justiciable interest that is specific to the individual claimed as an "affected person." Furthermore, CRR claims that this individual lives within five miles of the proposed facility. There was no claim that this "affected person" was an adjacent landowner or lived within 500 feet of the facility's boundaries. It is unlikely that a person who resides five miles away from the proposed

¹ 30 TEX. ADMIN. CODE § 328.70

² 30 TEX. ADMIN. CODE § 55.103

facility will be adversely impacted by this registration. Therefore, CRR did not present adequate information to establish its affected person status. Accordingly, CRR's MTO should be denied for lack of standing to file a MTO for this registration application.

However, if the Commission determines that CRR has standing to file its MTO, as discussed below, the ED found that the Applicant has satisfied all requirements for its registration application in accordance with TCEQ rules.

III. The Applicant complied with all notice requirements.

In order for a scrap tire storage site to receive a registration from the Executive Director it must comply with the requirements of Commission Rule 30 TEX. ADMIN. CODE § 328.60.³ That rule describes information that must be included in a registration application. CRR's first claim in its MTO is that the Applicant did not comply with all the notice requirements. Commission Rule § 328.60(b) describes the notice requirements that an applicant must follow upon filing a scrap tire storage registration application. The applicant must provide notice to the general public by means of a notice by publication and a notice by mail. The published notice must specify certain information relating to the proposed facility and who may be contacted at the Commission to obtain more information about the application.⁴ CRR's concerns are limited to the notice by publication for the storage site. The ED found that the Applicant has satisfied all the notice requirements as discussed below.

A. The application was not "returned."

In its MTO, CRR claims that the registration application was "returned" by ED staff on February 26, 2010, and was no longer on file with the Commission when final notice was published on February 28th. CRR argues that the statement in the published notice advising individuals to contact the TCEQ regional office for specific information about the project was no longer accurate, thereby depriving the public of an opportunity to review the completed application.

³ Some of the rules in Chapter 328, including 328.60 and 328.63 were amended effective October 7, 2010. However, this application was filed before the effective date and is subject to the former rules as per 35 Tex. Reg. 8965 (October 1, 2010).

⁴ 30 TEX. ADMIN. CODE § 328.60(b)

As part of the ongoing application process, the TCEQ rules authorize the Executive Director to notify the applicant of any deficiencies in the application and to allow time for the applicant to submit additional information.⁵ The ED notified the Applicant of deficiencies in its application in a letter dated February 26, 2010. However, that letter did not constitute a return or denial of the application. Genan's application remained open and pending while it corrected the items listed in the NOD. Staff mailed the original application binder back to the Applicant so that the Applicant could include the additional information. The Executive Director did not "return" the application. In fact, the ED extended the time the Applicant had to respond to the NOD in accordance with § 328.60(c). No extension would have been necessary if the application would have been "returned" and was no longer on file.

Therefore, since the application was not "returned", but was still pending at the TCEQ, the published notice contained accurate information advising individuals to contact the correct TCEQ region office. ED Staff is able to provide copies of the application or answer any questions from the public. In addition, the application was available from the Applicant or the county judge as indicated in the notice. Accordingly, the members of the public were afforded an opportunity to contact the region office, the Applicant or the county judge to review the application.

B. TCEQ rules do not require republication of notice upon issuance of a notice of deficiency.

CRR claims that the Applicant should be required to republish notice once a revised application was available. CRR argues that the initial notice was not adequate to allow the public an opportunity to review all of the information in order to determine if they may be affected.

The TCEQ rules require the Applicant to publish notice which includes the name, affiliation, address, and telephone number of the applicant and of the commission employee who may be contacted to obtain more information about the application.⁶ The notice must also state that the application is available for review by interested parties.⁷ However, the rules do not require the Applicant to republish notice once it has

⁵ 30 TEX. ADMIN. CODE § 328.60(c)

⁶ 30 TEX. ADMIN. CODE § 328.60(b)(3)

⁷ *Id.*

submitted additional information in response to a notice of deficiency. The notice published by the Applicant included all the required information. Therefore, the Applicant has met all notice requirements pursuant to § 328.60(b). The Applicant would only be required to provide a second notice if it had submitted a new application.

In other types of waste applications, the TCEQ rules require an applicant to publish notice a second time only when changes to the application amount to a major amendment.⁸ Even by analogy, the additional information requested in the NOD does not amount to a major amendment to the application. The TCEQ's notice of deficiency requested that the Applicant include a landowners map, the local fire marshal's approval of the plans, approval by the local emergency response teams to participate in the fire plan, documentation to support the facilities compliance with local ordinances, evidence of financial responsibility, and to provide a schedule for construction and completion of the site. The addition of these documents to the application does not make it a substantially different application. No major changes were made to the substantive technical requirements initially included in the application.

The noticed application that was available for review included information which would allow all interested parties who reviewed the application to know where the facility is to be located and what type of activities were proposed for the facility. Accordingly, the application provided sufficient information to allow all interested parties the ability to determine if they may be affected. Furthermore, the Applicant mailed copies of the revised application to Houston-Galveston Area Council, the Mayor of Houston, and the Harris County Judge on August 7, 2010, which was two-and-a-half months before the ED granted the registration. Once the information responsive to the NOD was submitted to the TCEQ, it was made available for any interested party to review.

Therefore, the published notice was adequate to inform the public of the necessary information needed in order to determine the affectedness of interested parties.

⁸ 30 TEX. ADMIN. CODE § 281.23

IV. The Applicant provided adequate information regarding the proposed site.

CRR asserts that the Applicant did not provide adequate information regarding the proposed site and did not comply with all the mapping requirements. CRR argues that the Location Map, Topographic Map, and the Landowners Map lack basic information required by the rules.

A. The Applicant substantially complied with all mapping requirements.

The TCEQ rules establish certain requirements that are to be included in each map or drawing attached to the application for the storage site.⁹ CRR asserts that the Location Map and the Topographic Map do not include a north arrow or a scale of one-half inch equals one mile in accordance with the Commission's rules.

Although some maps do not include a north arrow or have a scale of one-half inch equals one mile, all maps clearly provide the location of the proposed facility and utilize an appropriate map scale to aid in the measurement of actual distances. The Location Map and Topographic Map depict the proposed site boundary and roadway access in accordance with TCEQ rules. The Applicant also stated that the Topographic Map is a United States Geological Survey quad map as required by § 328.60(b)(9)(A)(ii). The lack of a north arrow or a map scale of one-half inch equals one mile is not a technical requirement that could increase the potential for harm to human health or the environment. The ED was able to properly review and analyze this application while relying on the included maps. Therefore, the Applicant has substantially complied with all mapping requirements.

CRR also argues that none of the maps reflect that a residential structure sits on the proposed site. However, the Applicant has stated that there are no residential structures on the site. Therefore, the maps are labeled accurately for the proposed facility.

⁹ 30 TEX. ADMIN. CODE § 328.60(b)(7) and (9).

B. The Landowners Map complies with Commission rules.

CRR argues that the Landowners Map does not reflect the property site or reflect that a 500-foot radius has been drawn around the site. The TCEQ rules require that the landowners map must show all property ownership within 500 feet of the site and must include a list that gives each property owner's name and mailing address.¹⁰

The Applicant's Landowners Map is included in the application as attachment 11. The map depicts all property ownership within the 500-foot radius around the site. Also included in Attachment 11 is a list of each property owners' names and addresses that are keyed to the Landowners Map showing the location of each property as required by the TCEQ rules.

CRR also claims that the owner of tract number 22 is not listed on the Landowners Map. However, after further investigation by the Applicant it was determined that tract 22 is owned by Southern Pacific Rail Corporation, which also owns tract 15, and was properly notified of this application.

CRR further claims that it is not clear if the Northeast Harris County MUD 1 was given proper notice. The Applicant gave proper notice to all landowners listed in the most recent Harris County Appraisal District's map. The Harris County Appraisal District's map lists the owners of tract 19A and 19B as being BGM Land Investments LTD. Notice was provided to this owner. Moreover, the Applicant searched the TCEQ database for all MUDs and CCNs in the area. The TCEQ records do not list a MUD with that name.

Therefore, the Applicant properly listed all potentially affected landowners within 500 feet of the proposed site and keyed the property ownership to the Landowner Map in compliance with Commission rules.

C. The Applicant included a legal description of the proposed facility in the application.

CRR asserts that there was not a legal description attached to the property owner's affidavit. The TCEQ rules require a legal description of the storage facility to be included in the application.¹¹ The Applicant submitted the legal description of the

¹⁰ 30 TEX. ADMIN. CODE § 328.60(b)(9)(A)(iii)

¹¹ 30 TEX. ADMIN. CODE § 328.60(b)(9)(B); *See also* 30 TEX. ADMIN. CODE § 328.60(b)(9)(C)(i)

proposed facility in Attachment 12 of the application. The Applicant's Property Owner Affidavit, Attachment 6, refers to that legal description. Therefore, the Applicant has properly complied with the TCEQ rules.

V. The Applicant provided all the technical information required.

CRR argues that the Applicant did not meet all technical requirements with the information that was provided in the application. Section 328.60(b) of the Commission's rules establishes certain information or plans that must be submitted in the application for a storage site. CRR claims that the Applicant's Site Layout Plan, Drainage Plan, Fire Plan, and Site Operating Plan do not meet the requirements of the rules. As discussed below, the Applicant has complied with all requirements.

A. The Site Layout Plan includes all required information

CRR claims that the Applicant's Site Layout Plan did not clearly show the location of the gatehouse or the shredder that will be employed and did not mark the locations of the personnel assembly points and evacuation routes. The TCEQ rules require a site layout plan to include the location of buildings, storage areas, fire lanes and fire control facilities, security fences, gatehouses, and location of processing equipment.¹²

The Site Layout Plan attached to the application as Attachment 32 clearly shows all of the required information. The Site Layout Plan depicts the location of buildings, tire storage areas, fire lanes, firefighting equipment and firefighting staging area. Also included are the locations of the gatehouse, security fences, the site entrance, and the proposed future manufacturing building. Furthermore, Attachment 9 of the application provides the proposed location of the shredders within the manufacturing building. The application also includes a shredder site operating plan which describes the types of processing equipment that is expected to be routinely available for use at the facility.

Moreover, the TCEQ rules do not require that the site layout plan include personnel assembly points or evacuation routes. Those items are a part of the Fire Plan which was approved by the Harris County Fire Marshal. Therefore, the Applicant

¹² 30 TEX. ADMIN. CODE § 328.60(b)(10)(A)

provided all the technical information in its Site Layout Plan that is required by the Commission's rules.

B. The Applicant's Drainage Plan included all required information.

CRR claims that the Applicant's Drainage Plan does not comply with the TCEQ rules. CRR argues that the application does not show how the normal drainage patterns will not be significantly altered. The TCEQ rules require submittal of a drainage plan which shows the drainage flow throughout the facility and calculations that show the normal drainage patterns will not be significantly altered.¹³ However, if the ED determines that significant alterations will occur, the rules require the applicant to design and provide additional surface drainage controls to mitigate the effects of the altered watershed.¹⁴

In Attachment 5 of the application, the Applicant provided a drainage map which shows the direction of drainage flow throughout the facility. The drainage calculations were provided in the retention pond study that was made a part of the application and signed and sealed by a licensed engineer. The study indicates that the peak flow rate for the 10-year pre-development condition is 41.94 cfs, but will increase to 124.82 cfs for a 10-year post-development condition without any additional surface drainage controls.

However, the Applicant has instituted additional surface drainage controls to mitigate the effects of the altered watershed as required by the TCEQ rules. The Applicant's proposed detention pond with its pump system, used to limit the flow from the facility to the existing road side ditch, will mitigate any effects from the additional drainage. The study states that the required detention pond volume is 22.649 ac-ft; however, the proposed volume is 40.21 ac-ft. This increase in volume capacity will allow collection of more surface drainage and control the rate of discharge. In fact, the detention pond's use of a pumping system will limit the facility's outflow rate to 3.99 cfs. This rate is even lower than the drainage flow rate for pre-development conditions. In a letter dated October 11, 2010, the Texas Department of Transportation stated that it had reviewed the drainage study and has no objections to the conclusions reported. Furthermore, upon construction of the site, if the drainage pattern information changes,

¹³ 30 TEX. ADMIN. CODE § 328.60(b)(10)(B)

¹⁴ *Id.*

the Applicant must notify the Executive Director so that staff can review the new information.

Accordingly, the Applicant has provided all necessary technical information in accordance with the TCEQ rules.

C. The Applicant's Fire Plan satisfies the requirements of the TCEQ rules.

CRR argues that the Fire Plan is inadequate because it does not include roles to be assumed by on-site personnel, locations of duty stations, and lacks any information about procedures to be followed in case of fire and does not show the best route for the emergency response teams to get to the site. The TCEQ rules require the fire plan to be maintained at the site and to include guidance on roles to be assumed by on-site personnel, arrangements with local emergency response teams, list of emergency equipment, and information about insurance for the site.¹⁵

The Applicant's Fire Plan complies with the Commission's rules. The Fire Plan identifies Butch Battreall as the Site Emergency Coordinator who will be responsible for fire prevention and control and who will conduct fire prevention meetings with company personnel. Furthermore, the Fire Plan lists the local emergency response teams that have agreed to participate in the fire plan¹⁶ and, states that upon construction of the site, emergency fire equipment will be placed every 75 feet down unobstructed travel paths. The Applicant's plans have been approved by the Harris County Fire Marshal.¹⁷ The Applicant has also entered into a blanket order agreement with Williams Fire & Hazard Control. Additionally, the map attached to the back of the Fire Plan shows the location of the emergency response teams who have agreed to participate in the fire plan and the major highways used to get to the proposed site location.

The Applicant also included information about insurance for the site in Attachment 27. The Applicant is insured for full replacement costs and has a general

¹⁵ 30 TEX. ADMIN. CODE § 328.60(b)(10)(C)

¹⁶ See also Attachments 16, 17, and 18 of the Application.

¹⁷ See Attachment 15 of the Application.

insured limit combined for property damage and business interruption amounting to \$88,321,079.33.¹⁸

The Applicant's Fire Plan is adequate, and it complies with the Commission's rules.

D. The Site Operating Plan provides all information required by TCEQ rules.

CRR claims that the Site Operating Plan is too general. CRR does not cite any specific concerns other than its assertion that the vector control procedures should have been approved by the Harris County Mosquito Authority. The TCEQ rules require that the site operating plan include specific guidance and instructions for the management and operation of a scrap tire storage site.¹⁹ The rules list thirteen specific items that must be included in the plan.²⁰ The Applicant's Site Operating Plan includes all required information listed in the Commission's rules. The plan specifically addresses each requirement and provides guidance and instructions for each item. The plan's vector control procedures are adequate to control vectors. Furthermore, the TCEQ rules do not require the vector control procedures to be approved by the Harris County Mosquito Authority. Therefore, the Applicant has provided all necessary information in its Site Operating Plan as required by the rules.

E. The Applicant provided adequate cost estimates for closure.

CRR claims that the cost estimate for closure is inadequate but fails to state any specific concerns. The TCEQ rules require an owner or operator of a scrap tire storage site to prepare a written estimate for the cost of hiring a third party to close the facility.²¹

The Applicant included a closure cost estimate in the application as Attachment 19. The Applicant's registration allows for a total of 309,120 tires to be stored on site. The cost estimate for removing that many tires and closing the facility is \$532,048. In calculating this amount, the Applicant received cost estimates from several different companies to perform the necessary tasks needed for closure. The Applicant has also created an irrevocable standby letter of credit in favor of the TCEQ at PNC Bank in the

¹⁸ The insurance policy states the amount insured as DKK 500,000,000. When converted into U.S. dollars, that amount equals \$88,321,079.33

¹⁹ 30 TEX. ADMIN. CODE § 328.60(b)(10)(E)

²⁰ 30 TEX. ADMIN. CODE § 328.60(b)(10)(E)(i) through (xiii)

²¹ 30 TEX. ADMIN. CODE § 328.71

amount of \$532,048.00.²² This amount is adequate to close the proposed facility. Therefore, the cost estimate for closure is adequate and meets all requirements of the TCEQ rules.

VI. The Application includes all information required by rule 328.63

Commission Rule 328.63 applies to owners and operators of facilities that process, conduct energy recovery or recycle used scrap tires or tire pieces. The Applicant in this case will be processing used scrap tires to produce crumb rubber. Accordingly, the Applicant must comply with Commission Rule § 328.63. CRR argues that the Applicant has not included all of the required information in its application. Specifically, CRR claims that the Applicant should be required to obtain all permits before the ED approves the registration and that the end use market information is very general.

A. The application provides all necessary information regarding other applicable permit/registration authorizations.

CRR argues that the Applicant should have been required to obtain all required approvals for the facility and provide them with the application before the ED granted this registration. The TCEQ rule cited by CRR only requires that the application provide a list of all other applicable federal, state, and local permits and/or registrations.²³ Unlike some TCEQ rules, this rule does not require that other authorizations be obtained and that proof of such authorizations be provided with this application.

The Applicant's proposed scrap tire facility has not been constructed at this time. The first step in the process is to seek authorization from the TCEQ for a scrap tire registration. It would have been unnecessary to obtain other permits if the Applicant would have been denied the registration. Upon receiving the registration, the Applicant has applied for and has established a schedule for applying for all necessary permits. The Applicant has included in the application a timeline for construction of the facility and for receiving all required permits.²⁴ Furthermore, the Applicant's Site Operating Plan states that permits for the storage site development have been applied for at Harris

²² See Attachment 26 of the Application

²³ 30 TEX. ADMIN. CODE § 328.63(c)(4)(G)

²⁴ See Attachment 22 of the Application

County Permitting Department. The Applicant explains that as the permits are received, they will be provided to the TCEQ for verification of the requirements to comply with all codes and ordinances. All required information was included in the application in compliance with the TCEQ rules.

B. The application included information regarding the manufactured product and end use market.

CRR claims that the end use market information included in the application is too general. TCEQ Rule § 328.63(c)(4)(E) states that the Applicant must include in support of its application information regarding the product to be manufactured and the end use market. In Attachment 23 of the application, the Applicant has provided a marketing plan which describes that the facility will produce rubber granulates and powder for use in the domestic market for this material. The rubber product can be used in numerous applications, including artificial turf, playgrounds, flooring, insulation, paint, and technical rubber compounds.²⁵ In support of its end use market, the Applicant submitted confidential commercial business end use market information to the Executive Director. ED Staff reviewed the confidential information and contacted all the entities identified as the Applicant's end use market buyers and commercial partners. Staff also contacted the pertinent state regulators associated with the documented end use markets. Staff received confirmation that all companies identified by the Applicant were currently operating in compliance with the associated state's rules and regulations. Based on the review of the confidential information, the ED determined that the Applicant has submitted adequate information demonstrating compliance with scrap tire facility registration requirements.

VII. Conclusion

The Commission has an obligation to ensure that each scrap tire facility and storage site registration application complies with the TCEQ rules. The application submitted by Genan, Inc. provides all the necessary information required for approval of the registration by the Executive Director. The Applicant fulfilled the notice requirements, provided sufficient information regarding the registration, and included

²⁵ See Attachment 23 of the Application
ED's Response to MTO

all required technical information. Therefore, the registration application submitted by Genan was appropriately approved by the Executive Director in accordance with Commission rules. Accordingly, the Executive Director respectfully requests that the Commissioners deny the Citizens for Responsible Recycling's Motion to Overturn.

Respectfully submitted,

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Mark R. Vickery, P.G.
Executive Director

Robert Martinez, Director
Environmental Law Division

By 

Ron M. Olson, Staff Attorney
Environmental Law Division
State Bar of Texas No. 24056070
P.O. Box 13087, MC-173
Austin, Texas 78711-3087

REPRESENTING THE
EXECUTIVE DIRECTOR
OF THE TEXAS COMMISSION
ON ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December, 2010, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, or hand-delivered to the persons on the attached Mailing List.

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

Ron Olson, Staff Attorney
Environmental Law Division

Mailing List

Application of Genan, Inc.
For Scrap Tire Storage Facility
in Harris County, Texas, Registration No. 6200673

TCEQ Docket No. 2010-1886-MIS

CITIZENS FOR RESPONSIBLE RECYCLING:

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