

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

May 9, 2006

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

CHIEF CLERKS OFFICE

206 MAY -9 PM 4:37

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Re: Executive Director's Motion to Extend Time to File Exceptions and Reply Briefs  
*Executive Director of the Texas Commission on Environmental Quality v. Chester L. Slay, Jr., Individually; Union Texas Limited Partnership; and Chester L. Slay, Jr., Trustee of Peckham family Trust; SOAH Docket No. 582-04-0251; TCEQ Docket No. 2000-0396-IHW-E*

Dear Ms. Castañuela:

Enclosed for filing is the original "Executive Director's Motion to Extend Time to File Exceptions and Reply Briefs" in the above enforcement matter.

If you have any questions or comments, please call me at (512) 239-2053.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Sallans".

Jim Sallans  
Attorney  
Litigation Division

Enclosures

cc: Service List

IN THE MATTER OF AN  
ENFORCEMENT ACTION AGAINST  
CHESTER L. SLAY, JR.,  
INDIVIDUALLY; UNION TEXAS  
LIMITED PARTNERSHIP; AND  
CHESTER L. SLAY, JR., TRUSTEE  
OF THE PECKHAM FAMILY TRUST.  
TCEQ SOLID WASTE  
REGISTRATION NO. 34799

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BEFORE THE  
TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

CHIEF CLERKS OFFICE

2006 MAY -9 PM 4:37

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

**EXECUTIVE DIRECTOR'S MOTION TO EXTEND TIME TO FILE EXCEPTIONS  
AND REPLY BRIEFS**

TO THE HONORABLE GENERAL COUNSEL:

COMES NOW, the Executive Director of the Texas Commission on Environmental Quality ("TCEQ"), and files this his Motion to Extend Time to File Exceptions and Reply Briefs, and in support thereof would show the following:

1. On April 19, 2006 the Administrative Law Judge in this enforcement action issued a Proposal for Decision ("PFD") that includes 52 pages of analysis and a 511 page trial record.
2. Due to changes to members of the Executive Director's staff, the staff attorney tasked with preparing and filing Exceptions received the PFD on April 27, 2006.
3. Members of the of the Executive Director's staff who performed the hearing are no longer part of the Executive Director's staff and will not be available to review the PFD and assist counsel for the Executive Director as he prepares his exceptions to the Administrative Law Judge's PFD.
4. 30 TEX. ADMIN. CODE § 80.257 provides that parties must file exceptions to a PFD within 20 days after its issuance. Similarly, 30 TEX. ADMIN. CODE § 80.257 provides that parties

must file replies to any exceptions within 30 days after issuance of the PFD.

5. Given the extent and number of issues involved, along with the time necessary to review the PFD and draft exceptions and replies, and given the fact that counsel for the Executive Director will have to work with existing staff and their schedules during the reduced briefing schedule, the Executive Director respectfully requests that the deadlines in 30 TEX. ADMIN. CODE § 80.257 be extended. Specifically, the Executive Director respectfully requests that the time to file exceptions be extended 15 days, establishing the deadline to submit exceptions on May 24, 2006. Accordingly, the Executive Director also respectfully requests that the time to file replies to exceptions be extended to June 23, 2006.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, the Executive Director respectfully requests that the Office of General Counsel extend the deadlines for filing exceptions and reply briefs as set out in this motion.

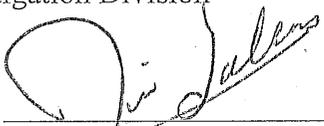
Respectfully submitted,

Texas Commission on Environmental Quality

Glenn W. Shankle  
Executive Director

Stephanie Bergeron, Acting Deputy Director  
Office of Legal Services

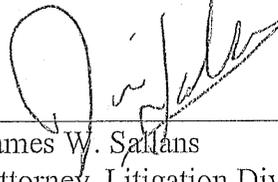
Mary Risner, Acting Director  
Litigation Division

by   
\_\_\_\_\_

James W. Sallans  
State Bar of Texas No. 00785413  
Litigation Division, MC 175  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-3400  
(512) 239-3434 (Fax)

CERTIFICATE OF CONFERENCE

I have discussed this motion with the Office of Public Interest Counsel, and the Office of Public Interest Counsel does not object to this request for extension of time.



---

James W. Sallans  
Attorney, Litigation Division  
Texas Commission on Environmental Quality

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of May, 2006, the original of the foregoing "Executive Director's Motion to Extend Time to File Exceptions and Reply Briefs" was filed with the Chief Clerk, Texas Commission on Environmental Quality, Austin, Texas.

I further certify that on this day a true and correct copy of the foregoing "Executive Director's Motion to Extend Time to File Exceptions and Reply Briefs" was served on each of the parties as indicated:

**Via Certified Mail, Return Receipt Requested (Article No. 7002 2410 0001 7630 3572)**

**Via Facsimile No (409) 962-3300**

Mr. Chester L. Slay, Jr.  
8700 Old Ferry Road  
Port Arthur, Texas 77619

**Via Certified Mail, Return Receipt Requested (Article No. 7002 2410 0001 7630 3602)**

Mr. Chester L. Slay, Jr.  
8200 Yacht Club Road  
Port Arthur, Texas 77641

**Via Interagency Mail**

**Via Facsimile Number (512) 475-4994**

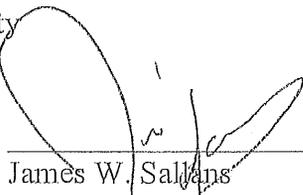
The Honorable Howard S. Seitzman  
Administrative Law Judge  
State Office of Administrative Hearings  
300 W. 15th Street, Suite 502  
P.O. Box 13025  
Austin, Texas 78711-3025

**Via Hand Delivery**

Mr. Blas Coy, Jr., Attorney  
Office of Public Interest Counsel, MC-103  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

**Via Hand Delivery**

Mr. Derek Seal, General Counsel  
Office of the General Counsel  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087



James W. Sallans  
Attorney, Litigation Division  
Texas Commission on Environmental Quality

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2006 MAY -9 PM 4:37  
CHIEF CLERKS OFFICE

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

May 18, 2005

CHIEF CLERKS OFFICE

2005 MAY 19 AM 11:05

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

- To: Persons on the attached mailing list (By mail and facsimile as indicated)
- Re: Executive Director's Motion to Extend Time to File Exceptions and Reply Briefs with regard to the Proposal for Decision and Proposed Order in the Matter of an Enforcement Action Against Chester L. Slay, Jr., individually; Union Texas Limited Partnership; and Chester L. Slay, Jr., Trustee of the Peckham Family Trust; Solid Waste Registration No. 34799; TCEQ Docket No. 2000-0396-IHW-E; SOAH Docket No. 582-04-0251.

By letter dated May 9, 2005, the Executive Director filed his Motion to Extend Time to File Exceptions and Reply Briefs (Motion). In his Motion, the Executive Director explains that due to changes to members of his staff and because of the extent and number of issues involved and length of the Proposal for Decision and the hearing in this case, he requires additional time to work with his staff on the issues in this case and to submit exceptions and a reply brief. After review of the Motion and the Proposal for Decision and Proposed Order, I have determined to grant the request for additional time for all parties to file exceptions and reply briefs. Thus, in accordance with 30 Texas Administrative Code Section 80.257, the deadline for filing exceptions is extended from May 9, 2006, to no later than **5:00 p.m. on Friday, June 9, 2006**, and the deadline for filing reply briefs is extended from May 19, 2006, to **5:00 p.m. on Friday, June 23, 2006**.

Certification of service to the attached mailing list and an original and eleven copies of any exceptions or reply brief must be filed with the Commission's Chief Clerk by the respective deadline for the filing to be considered timely. All exceptions and replies that are filed must also clearly reference the TCEQ and SOAH docket numbers, and they must be addressed to the attention of the Agenda Docket Clerk.

If you have any questions about this matter, please contact Celeste A. Baker, Assistant General Counsel, at 512/239-5500.

Respectfully,

A handwritten signature in cursive script that reads "Derek Seal".

Derek Seal  
General Counsel

### Mailing List

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Mailing List

Chester L. Slay, Jr. individually; Union Texas Limited Partnership;  
and Chester L. Slay, Jr., Trustee of Peckham Family Trust  
TCEQ Docket No. 2000-0396-IHW-E  
SOAH Docket No. 582-04-0251

Chester L. Slay, Jr.  
8700 Old Ferry Road  
Port Arthur, Texas 77619  
409/962-6322 FAX 409/962-3300

**Via Certified Mail No. 7003 0500 0002 9940 7512**

Chester L. Slay, Jr.  
8200 Yacht Club Road  
Port Arthur, Texas 77641

**Via Certified Mail No. 7003 0500 0002 9940 7529**

Howard S. Seitzman  
Administrative Law Judge  
State Office of Administrative Hearings  
P.O. Box 13025  
Austin, Texas 78711-3025  
512/475-4993 FAX 512/475-4994

James W. Salinas  
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Blas Coy  
TCEQ Office of Public Interest Counsel MC 103  
P.O. Box 13087  
Austin, Texas 78711-3087  
512/239-6363 FAX 512/239-6377

Docket Clerk  
TCEQ Office of Chief Clerk MC 105  
P.O. Box 13087  
Austin, Texas 78711-3087  
512/239-3300 FAX 512/239-3311

Jody Henneke  
TCEQ Office of Public Assistance MC 108  
P.O. Box 13087  
Austin, Texas 78711-3087  
512/239-4000 FAX 512/239-4007

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 9, 2006

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

Re: Executive Director's Exceptions and Proposed Modifications to Proposal for Decision  
Chester L. Slay, Jr., Individually; Union Texas Limited Partnership; and Chester L. Slay, Jr., Trustee of Peckham Family Trust  
TCEQ Docket No.: 2000-0396-IHW-E; SOAH Docket No.: 582-04-0251

Dear Ms. Castañuela:

Enclosed for filing is the original "Executive Director's Exceptions and Proposed Modifications for Proposal for Decision" (the "Exceptions"). Please also find one copy of this letter to you, one copy of the Exceptions, and one copy of the letter to the Respondent. Please file stamp these documents and return them to Jim Sallans, Attorney, Litigation Division, MC 175. If you have any questions or comments, please call me at (512) 239-2053.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Sallans".

Jim Sallans  
Attorney  
Litigation Division

Enclosure

cc: The Honorable Howard S. Seitzman, State Office of Administrative Hearings, 300 W.  
15<sup>th</sup> Street, Austin, Texas 78711  
Chester L. Slay, Jr., 8700 Old Ferry Road, Port Arthur, Texas 77619  
Chester L. Slay, Jr., 8200 Yacht Club Road, Port Arthur, Texas 77642  
Blas Coy, Office of the Public Interest Counsel, TCEQ, MC 103

CHIEF CLERKS OFFICE

2006 JUN -9 PM 4: 59

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



supports these determinations, and the requested penalties should apply to Mr. Slay and the other named Respondents.

The ED does not agree, however, with the ALJ's election to evaluate violations on a Facility-wide basis and not on a per waste-stream basis. Specifically, the ALJ treated violations as a single event instead of four separate events. This is contrary to the testimony provided and inconsistent with the method the agency handles violations involving multiple waste-streams.<sup>1</sup>

#### A. Penalty Calculation - Compliance History Enhancement

The Executive Director disagrees with the ALJ's rejection of the penalty enhancements for compliance history. The Executive Director calculated the penalty using the 2002 Penalty Policy and 30 TAC Section 60.1. The Penalty Policy and 30 TAC Section 60.1 requires an enhancement of the penalty based on compliance history. Staff examines the five-year histories of the site itself and the new owner. According to the Penalty Policy, the Compliance History is determined in part by looking at previous commission orders. In this case, the proposed penalty was enhanced based on an Agreed Order entered in January of 2000 against a previous owner of the facility, Palmer Barge (TCEQ Docket No.1997-0103-MLM-E). The ALJ correctly recites the background details where he states,

With respect to the "Compliance History Site Classification," Mr. Murphy explained that the site history is attributed to the current owner, no "matter who owned it previously." As he testified, "{y}ou inherit the site compliance history." As the basis for his interpretation, Mr. Murphy cites 30 TAC Section 60.1. Specifically, 30 TAC Section 60.1(a)(7)(C) provides that beginning on September 1, 2002, the Compliance History prepared pursuant to the chapter shall be used in agency decisions to a proceeding that is initiated or an action that is brought on or after September 1, 2002, for the imposition of a penalty in a matter under the jurisdiction of the Commission.<sup>2</sup>

Accepting these facts as true, the Penalty Policy supports the requested penalty enhancement. The ALJ's basis for rejecting the penalty enhancement was stated in his PFD as being manifestly unjust even though it may be technically and mathematically correct.<sup>3</sup> It is the Executive Director's position in support of the Penalty Policy in effect at the time, that the TCEQ considered all aspects of its penalty enhancement criteria and believes that the compliance history enhancement was justified in tying the Facility's compliance history to penalty enhancements regardless of property

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<sup>1</sup> TR Vol 1 page 225; TR Vol 1 pages 241-242 and TR vol 2 page 449.

<sup>2</sup> PFD pages 21-22.

<sup>3</sup> PFD pages 22-23.

ownership. Applying the provisions of the Penalty Policy in preparing a compliance history for a specific site, the Executive Director prepares a history for each person who has owned the site during the past five years. This is consistent with how the Penalty Policy has been applied in other cases. Furthermore, the Executive Director may not ignore or disregard the duty imposed by the Legislature and the Commission to consider compliance history of a site in determining penalties.

Accordingly, the Executive Director contends that under 30 TAC § 60.3(g) a person or a site classification itself shall not be a contested issue in an enforcement hearing. This is consistent with the intent of the legislature as well as agency comments when adopting this provision.<sup>4</sup>

The Executive Director respectfully disagrees with the ALJ's characterization that it is unjust and arbitrary to assess a higher penalty because an unrelated person committed violations at the same location. The location, the Palmer Barge facility, now owned by Respondents and the subject of enforcement in this action, was itself the subject of an enforcement action that resulted in Agreed Order entered in January of 2000 with a penalty amount of \$25,000. To assist the ALJ, the Executive Director respectfully provides that the \$25,000 penalty was agreed to only after financial review of the Respondents assets was conducted. The base penalty in that action was actually \$250,000 – the base penalty in the Slay case is \$322,500. Lastly, the penalty in the Palmer Barge case was assessed under a prior revision of the penalty policy that did not include enhancements allowed under 30 TAC 60.1. For those reasons, the Executive Director does not agree with the ALJ comparison with the Agreed Order in the Palmer Barge case.

#### B. Penalty Calculation - Economic Benefit Enhancement

The ALJ accepted the Executive Director's basis and method for enhancement of a penalty based

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<sup>4</sup> 27 Tex. Reg. 7824, 133 (January 2004).

Representative Chisum expressed concern about how the proposed rules "would broaden, deepen and further complicate the contested case process. The legislature clearly intends for compliance history to be a factor in permitting and enforcement actions, but we never intended to allow parties in a contested case hearing to fight about whether the agency properly ranked or classified and entity." Representative Chisum stated that as he understands the proposal, it would allow parties in a contested case hearing the opportunity to litigate whether the agency properly classified a person's compliance history, in effect creating a trial within a trial. He further asserted that the rules "could even be read to say we are allowing the initiation of a contested case solely on the issue of compliance history classification. This is certainly not the intention of the legislature especially in light of on going efforts to streamline the permitting process and especially the contested case aspect." Representative Chisum did allow that the "legislature does intend that the concept of the compliance history be open for input from the public as well as the entity whose compliance history is in question, but certainly not in a contested case hearing" and stated that he is aware that other alternatives have been suggested to the commission. The commission has made significant revisions to this subsection in response to comment. The commission agrees that a person or site classification itself should not be litigated in contested case hearings and has modified the rule accordingly.

on the economic benefit enjoyed by the respondents.<sup>5</sup> The Executive Director supports this conclusion, but must disagree with the amount of economic benefit the ALJ attributed to the Respondents for failing to remediate the site. The ALJ correctly recognized the basis and method used by the Executive Director, where he stated,

With respect to the economic benefit portion of the penalty, Mr. Murphy testified the economic benefits from the various alleged violations are totaled. If the economic benefit attributed to the respondent is \$15,000 or greater, the total base penalty is enhanced. If it is less than \$15,000, the total base penalty is not enhanced.<sup>6</sup>

The ALJ, however, concluded that because the economic benefit to Respondents, for failure to remediate was less than the \$15,000 threshold, that the ED should not be allowed to enhance for economic benefit to the respondents.<sup>7</sup> Given the obvious economic gain to respondents for failing to remediate the site, the ED categorized and determined that the enhancement of the penalty is supported by the testimony of Mr. Murphy.<sup>8</sup> Based on Mr. Murphy's testimony and the condition of the site, it is difficult to imagine that the costs to remediate a facility such as the one in this case would not exceed \$15,000. Accordingly, the Executive Director cannot support the Respondents complete failure to perform any remediation or the ALJ's denial of enhancement of the penalty for economic benefit.

With regard to Economic Benefit, the ALJ also makes the comparison to the \$25,000 Palmer Barge Agreed Order stating that the Penalty sought from Respondents is nearly 24 times greater.<sup>9</sup> As presented above, this comparison is not equitable and is not a proper basis to deny enhancement for economic benefit in this case.

### **III. Other Suggested Modifications**

The Executive Director suggests the following changes be made to the ALJ's Proposed Order:

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<sup>5</sup> PFD page 23.

<sup>6</sup> PFD page 23.

<sup>7</sup> PFD page 23.

<sup>8</sup> Tr. Vol.1, pages 226-229 and 264; and Vol.2, pages 401-404

<sup>9</sup> PFD page 24.

1. Modify Finding of Fact No. 13. to read, "As of June 12, 1999, Mr. Slay, through Union Capital and Union Texas, owned and operated the 17-acre Palmer Barge Site."
2. Modify Finding of Fact No. 62. to read, "None of Respondents with the exception of Chester L. Slay, Jr. engaged in any active operation at the Facility."
3. Modify Finding of Fact No. 70. to read, "For 18 violations, including the types of violations alleged against Respondents, Palmer's Agreed Order assessed an administrative penalty of \$250,000."
4. Modify Finding of Fact No. 72. to read, "The Penalty Calculation Worksheets (PCW) prepared by the Executive Director support its proposed administrative penalties."
5. Modify Conclusion of Law No. 11. to read, "The penalty events for each violation in the case was based on the characteristics of each violation."
6. Modify Conclusion of Law No. 13. to read: The collective violations for Respondents and corresponding penalties were based on the characteristics of each violation.
7. Modify Conclusion of Law No. 15. to read: The collective violations for Respondents and corresponding penalties were based on the characteristics of each violation.
8. Modify Conclusion of Law No. 17. to read: The collective violations for Respondents and corresponding penalties were based on the characteristics of each violation.
9. Modify Conclusion of Law No. 19 to read: The collective violations for Respondents and corresponding penalties were based on the characteristics of each violation.
10. Modify Conclusion of Law No. 21. to read: The collective violations for Respondents and corresponding penalties were based on the characteristics of each violation.
11. Modify Conclusion of Law No. 23. to read, "The PCWs prepared by the Executive Director support the administrative penalties proposed by the Executive Director."
12. Modify Conclusion of Law No. 24. to read, "Respondents should be assessed, jointly and severally a \$92,500 penalty for violation of TEX. WATER CODE § 26.121(a) and 30 TEX. ADMIN. CODE § 335.8(b)."
13. Modify Conclusion of Law No. 25. to read, "Respondents should be assessed, jointly and severally a \$69,375 penalty for violation of 30 TEX. ADMIN. CODE § 335.62 and 40 CFR § 262.11."

14. Modify Conclusion of Law No. 26. to read, "Respondents should be assessed, jointly and severally a \$46,250 penalty for their violation 30 TEX. ADMIN. CODE § 335.2 and 40 CFR § 270.1."
15. Modify Conclusion of Law No. 27. to read, "Respondents should be assessed, jointly and severally a \$370,000 penalty for their violation of 30 TEX. ADMIN. CODE § 335.112(a)(9) and 40 CFR Part 265, subpart J."
16. Modify Conclusion of Law No. 28. to read, "Respondents should be assessed, jointly and severally a \$18,500 penalty for their violation of 30 TEX. ADMIN. CODE § 335.6(c)."
17. Modify Conclusion of Law No. 29. to read, "Respondents should be assessed, jointly and severally a total penalty of \$596,625 for their violations."
18. Modify Ordering Provision No. 1. to read, "Chester L. Slay, Jr., individually; the Peckham Family Trust, Chester L. Slay, Jr., Trustee; and Union Texas Limited Partnership are assessed, jointly and severally, a \$596,625.00 administrative penalty for violation of 30 TEX. ADMIN. CODE § 335.112(a)(9) and 40 CFR Part 265, subpart J; 30 TEX. ADMIN. CODE § 335.6(c); TEX. WATER CODE § 26.121(a) and 30 TEX. ADMIN. CODE § 335.8(b); 30 TEX. ADMIN. CODE § 335.62 and 40 CFR § 262.11; and 30 TEX. ADMIN. CODE § 335.2 and 40 CFR § 270.1."
19. Modify Ordering Provision No. 2. by deleting Ordering Provision No. 2.
20. Modify Ordering Provisions Nos. 3, 4, 5, 6, 7, 8 and 9 by renumbering the Provisions to reflect the deletion of Ordering Provision No. 2.

#### **IV. Conclusion**

The Executive Director respectfully requests that the Commission adopt the ALJ's Proposal for Decision and enter the Proposed Order with the changes requested by the Executive Director.

Executive Director's Exceptions to Proposal for Decision  
SOAH Docket No. 582-04-0251  
TCEQ Docket No. 2000-0396-IHW-E  
Page 7

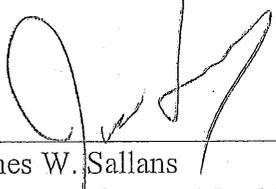
Respectfully Submitted,

Texas Commission on Environmental Quality

Glenn Shankle  
Executive Director

Stephanie Bergeron, Deputy Director  
Office of Legal Services

Mary Risner, Director  
Litigation Division

By:   
James W. Sallans  
State Bar of Texas No. 00785413  
Litigation Division, MC 175  
P.O. Box 13087  
Austin, Texas 78711  
(512) 239.2053  
(512) 239.3434 (FAX)

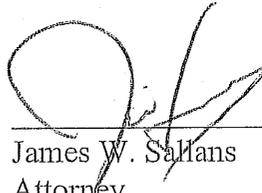
CERTIFICATE OF DELIVERY

I hereby certify on this 9th day of June, 2006, the original and 12 copies of the foregoing "Executive Director's Exceptions and Proposed Modifications to the Proposal for Decision" ("Exceptions") were filed with the Chief Clerk of the Texas Commission on Environmental Quality, Austin, Texas.

I further certify that a copy of the Exceptions were sent via facsimile to Administrative Law Judge Howard S. Seitzman with the State Office of Administrative Hearings at (512) 475-4994.

I further certify that on this day, a true and correct copy of the foregoing Exceptions via first class mail to Chester L. Slay, Jr.

I further certify that on this day a true and correct copy of the foregoing Exceptions were hand delivered to Mr. Blas Coy, Public Interest Counsel, Texas Commission on Environmental Quality, Austin, Texas.



---

James W. Sallans

Attorney

Litigation Division

Texas Commission on Environmental Quality