

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



TEXAS
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QUALITY

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

CHIEF CLERKS OFFICE

July 23, 2009

LaDonna Castañuela
Office of the Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
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Austin, Texas 78711-3087

Re: Executive Director's Replies to Exceptions; Consolidated SOAH Docket Nos.582-08-0861; TCEQ Docket No. 2007-1820-AIR; 2008-1210-AIR; Air Permit Nos. 79188, PSD-TX-1072, and HAP-14.

Dear Ms. Castañuela:

Enclosed please find a copy of the Executive Director's Replies to Exceptions for the above-referenced matter.

If you have any questions, please call me at 239- 4113.

Sincerely,

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

Booker Harrison
Senior Attorney
Environmental Law Division

Enclosures

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 23, 2009

The Honorable Tommy Broyles
The Honorable Craig Bennett
Administrative Law Judges
State Office of Administrative Hearings
300 W. 15th St., Suite 502
Austin, Texas 78701

Re: Executive Director's Replies to Exceptions; Consolidated SOAH Docket Nos. 582-08-0861; TCEQ Docket Nos. 2007-1820-AIR and 2008-1210-AIR; Air Permit Nos. 79188, PSD-TX-1072, and HAP-14.

Dear Judge Broyles and Judge Bennett:

Enclosed please find a copy of the Executive Director's Replies to Exceptions for the above-referenced matter.

If you have any questions, please call me at 239- 4113.

Sincerely,

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Booker Harrison
Senior Attorney
Environmental Law Division

Enclosures

CONSOLIDATED SOAH DOCKET NO. 582-08-0861
TCEQ DOCKET NO. 2007-1820-AIR
TCEQ DOCKET NO. 2008-1210-AIR

2009 JUL 23 PM 4: 53

CHIEF CLERKS OFFICE

APPLICATION OF	§	BEFORE THE STATE OFFICE
NRG TEXAS POWER, LLC, FOR	§	
STATE AIR QUALITY PERMIT	§	
79188 AND PREVENTION OF	§	
SIGNIFICANT DETERIORATION	§	OF
AIR QUALITY PERMIT PSD-TX-	§	
1072 AND HAZARDOUS AIR	§	
POLLUTANT MAJOR SOURCE	§	
[FCAA § 112 (g)] PERMIT HAP-14	§	ADMINISTRATIVE HEARINGS

**EXECUTIVE DIRECTOR'S REPLIES TO PROTESTANTS' EXCEPTIONS
TO THE PROPOSAL FOR DECISION**

TO HONORABLE ADMINISTRATIVE LAW JUDGES TOMMY BROYLES AND CRAIG BENNETT:

COMES NOW the Executive Director (ED) of the Texas Commission on Environmental Quality (TCEQ or Commission) and files the Executive Director's Replies to Protestants' Exceptions to the Proposal for Decision and in support thereof shows the following:

1. Completeness of the MACT review.

As stated in the ED's Exceptions to the ALJs Proposal for Decision and Order, the Application submitted by NRG satisfies the requirements of the Texas Clean Air Act, TCEQ rules, and 40 CFR § 63.43. Both the application and the administrative record reflect the suite of controls NRG identified for meeting the proposed MACT emissions limitation including a fabric filter baghouse, a wet FGD system, SCR, and sorbent injection.¹ The suite of controls that was found to consistently yield the lowest overall emission rates and that have been accepted in recent permit reviews as controls that can achieve BACT and MACT emission limits are the

¹ ED-12, p. 4.

same suite of controls proposed by NRG.² Since these technologies were submitted both in the application and as part of the administrative record, the Protestants were given the opportunity to present evidence on the technology that will be used by NRG to achieve their MACT emission limits.

2. Appropriateness of the evaluation of road emissions and the 0.6 fugitive adjustment factor.

The record clearly reflects that, if best management practices are followed, road emissions are not anticipated to occur at a level that would be significant for modeling purposes.³ Therefore, since NRG agreed to follow best management practices, road emissions were properly excluded from the model.

Regarding the 0.6 fugitive adjustment factor, Sierra Club cites to one comment submitted by EPA on a permit for TXI Midlothian from 2004. The TCEQ's response to that comment was "EPA is aware of limitations of the ISC model and has added algorithms to account for plume meander and mechanical turbulence in the proposed American Meteorological Society/ Environmental Protection Agency Regulatory Model (AERMOD) which will replace ISC." The fugitive adjustment factor is a procedure used by the TCEQ in modeling analysis performed with ISC.⁴

² ED-12, p. 6.

³ Tr. Vol. 4, 996:10-999:16; 1013:3-8; vol. 5, 1019:13-1020:4.

⁴ NRG-40, "TCEQ Modeling Adjustment Factor for Fugitive Emissions Memorandum," dated 3/6/2002.

Contrary to the suggestion of the Protestants, notice and an opportunity for a hearing were not required for the 0.6 fugitive adjustment factor. The models used in this application are EPA approved. The adjustment factor is not considered a "modification" or "change" to the actual model within the context of 30 TAC § 116.160 and 40 CFR § 52.21(1)(2), rather, it is an adjustment performed to the output data to more accurately account for planned emissions. As Mr. Opiela testified, it is an adjustment to the concentration *after* the model has completed its calculation.⁵ Such an adjustment is not uncommon. In fact, federal regulations require that all applications of air quality modeling be based on "the applicable models, data bases, and other requirements specified in appendix W of this part..."⁶ Appendix W provides that "[it] is not intended to be a compendium of modeling techniques. Rather, it should serve as a common measure of acceptable technical analysis when supported by sound scientific judgment."⁷ Mr. Opiela testified to the appropriateness of the adjustments to the modeling.⁸

3. Meteorological data.

Sierra Club is critical of the use of meteorological data collected at airports. However, Mr. Opiela's testimony details the reasons why use of the National Weather Service data from the Waco airport was appropriate and acceptable for the modeling.⁹ The *Meteorological*

⁵ Tr. Vol. 5, 1038: 6-8.

⁶ 40 CFR § 51.166(l)(1).

⁷ 40 CFR, part 51 app. W, § 1.0 a.

⁸ Ex. ED-14, p. 13.

⁹ Tr. vol. 4, 989:13 – 991:6; 1041:19 - 1042:1.

Monitoring Guidance for Regulatory Modeling Applications and *The Guideline on Air Quality Models* both state that use of NWS data for dispersion modeling is acceptable.

4. Use of models – AERMOD and ISC.

The use of AERMOD was not required until after December 9, 2006 as a replacement for ISC. NRG submitted their air dispersion modeling in November 2006. Therefore, the modeling performed at the time NRG submitted its application is proper. Thus, a change in the FOF would be misleading.

5. State versus federal guidance.

Sierra Club proposes to change FOF 50 to reflect that the application would only satisfy state requirements and state guidance. Sierra Club also requests that this FOF clarify that it is limited to non-SIP approved rules and state-only guidance.

However, such a broad statement is misleading since it does not specify any rules or guidance that would be affected by the FOF. Furthermore, TCEQ guidance, while applicable only to Texas, is developed with the participation and oversight of the EPA. Thus, to make such a "clarification" would be misleading and imply that the draft permit would not satisfy the federal requirements of the CAA.

6. PM Surrogate Policy.

Sierra Club proposes to delete language that would imply that both the EPA and TCEQ accepts demonstration of compliance with PM₁₀ NAAQS. As stated above the ED feels such a modification would be misleading. On October 23, 1997, EPA issued a memorandum providing

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for PM₁₀ to be used as a surrogate for PM_{2.5}.¹⁰ EPA reaffirmed that conclusion in a memorandum dated April 5, 2005.¹¹ EPA continued to recognize the issue and outstanding difficulties implementing PM_{2.5} in its *Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards*.¹² EPA also noted in the Final Rule that it did not include final PM_{2.5} requirements and that they would be issued in a later rule.¹³ In the Final Rule, EPA stated:

The purpose of this rulemaking is to finalize the major NSR program provisions for PM_{2.5}. This final rule supplements the final implementation rule for PM_{2.5} (excluding the NSR provisions) that we promulgated on April 25, 2007 at 72 FR 20586. This final action on the bulk of the major NSR program for PM_{2.5} along with our proposed rule on increments, SILs, and SMC, when final, will represent the final elements necessary to implement a PM_{2.5} PSD program. When both rules are promulgated and in effect, the PM_{2.5} PSD program will no longer use a PM₁₀ program as a surrogate, as has been the practice under our existing guidance.¹⁴

Finally, with respect to the transition to the PM_{2.5} standard, EPA established different requirements for delegated states and SIP-approved states. For SIP-approved programs, the EPA will allow the state to "continue to implement a PM₁₀ program as a surrogate to meet the PSD program requirements pursuant to the 1997 guidance..."¹⁵

¹⁰ U.S. EPA Memorandum from John S. Seitz, Director of Office of Air Quality Planning and Standards, *Interim Implementation of New Source Review Requirements for PM_{2.5}*, October 23, 2007.

¹¹ U.S. EPA Memorandum from Stephen D. Page, Director, *Implementation of New Source Review Requirements in PM-2.5 Nonattainment Areas*, April 5, 2005.

¹² 70 Fed. Reg. 65984, 66043 (November 1, 2005).

¹³ 72 Fed. Reg. 20586 (April 25, 2007).

¹⁴ *Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM_{2.5})* 73 Fed. Reg. 28321, 28323 (May 16, 2008).

¹⁵ *Id.* at 28341.

7. Use of the Travis County monitor for SO₂.

Citizens for Environmental Clean-up (CEC) argues that the Travis County monitoring data for SO₂ was inappropriate to use in the evaluation of the modeling audit. However, as Mr. Opiela testified, the modeling submitted by NRG, including the choice of background concentrations, was appropriate and acceptable. CEC argues that Big Brown I and II should be included in the background concentrations. However, the record reflects that Big Brown, along with Lake Creek and Twin Oaks, were included in the modeling.¹⁶ As the modeling process is explained in the record, point sources are included in the near-source retrieval from PSDB for evaluating impacts to the area of impact plus 50 kilometers.¹⁷ The background concentrations in the modeling represent non-point sources and the evidence shows that use of the Travis County monitoring data was the more conservative option for the model.¹⁸ Mr. Opiela testified that NRG's choices of data in the model were acceptable.¹⁹

8. Compliance with the NAAQS.

State and federal rules provide that the owner or operator of a proposed major source must demonstrate that the allowable emissions from the source will not "cause or contribute to" air pollution in violation of any NAAQS or PSD increment.²⁰ The standard of these rules is "cause or contribute to," and it is reasonable to interpret that standard as allowing, on a case-by-

¹⁶ Tr. 342-343.

¹⁷ In this case, the modeling included all point sources in Limestone County. Tr. 343.

¹⁸ ED Ex. 17, p. 5.

¹⁹ ED Ex. 14, p. 12.

²⁰ 40 CFR § 52.21(k).

case basis, insignificant additions of ozone precursors to a non-attainment area without those additions legally violating the NAAQS.²¹

Robertson County: Our Land, Our Lives (RCOLOL) asserts that Applicant's proposed emissions will improperly cause or contribute to air pollution in excess of the 8-hour ozone NAAQS. RCOLOL also argues that because there is no stated *de minimus* or significance level for ozone, any contribution to the standard would constitute a violation. However, this argument is not supported by state or federal rules. TCEQ rule 30 TAC § 116.161 states:

The commission may not issue a permit to any new major stationary source or major modification located in an area designated as attainment or unclassifiable, for any National Ambient Air Quality Standard (NAAQS) under FCAA, § 107, if ambient air impacts from the proposed source would cause or contribute to a violation of any NAAQS. In order to obtain a permit, the source must reduce the impact of its emissions upon air quality by obtaining sufficient emission reductions to eliminate the predicted exceedances of the NAAQS. A major source or major modification will be considered to cause or contribute to a violation of the NAAQS when the emissions from such source or modification would at a minimum, exceed the *de minimis* impact levels specified in § 101.1 of this title (relating to Definitions) at any locality that is designated as nonattainment or is predicted to be nonattainment for the applicable standard.

However, to know whether or not there is an exceedance any NAAQS, one must look to the definition of *de minimis* which is found in 30 TAC § 101.1(25) and is as follows:

De minimis impact – A change in ground level concentration of an air contaminant as a result of the operation of any new major stationary source or of

²¹ See *Alabama Power Co. v. Costle*, 636 F.2d 323, 360 (D.C. Cir. 1980). In reviewing the initial rule-making for the PSD program the court discussed the applicability of the *de minimis* doctrine. The court held that the *de minimis* "principle has often found application in the administrative context", and opined that "most regulatory statutes, including the Clean Air Act, permit such agency showings [that matters are truly *de minimis*] in appropriate cases." *Id.* These *de minimis* principles provided the basis for the significant impact levels in the PSD rules. 72 Fed. Reg. 54112, 54139 (September 21, 2007).

the operation of any existing source that has undergone a major modification that does not exceed the following specified amounts.

Air Contaminant	Annual	24-Hour	8-Hour	3-Hour	1-Hour
Inhalable Particulate Matter (PM ₁₀)	1.0 µg/m ³	5 µg/m ³			
Sulfur Dioxide	1.0 µg/m ³	5 µg/m ³		25 µg/m ³	
Nitrogen Dioxide	1.0 µg/m ³				
Carbon Monoxide			.05 µg/m ³		2 µg/m ³

Pursuant to 30 TAC § 116.161, a major source causes or contributes to a violation of the NAAQS when “the emissions...would at a minimum, exceed the *de minimis* impact levels specified in § 101.1...at any location that is designated as nonattainment.” Because ozone is not listed in 30 TAC § 101.1, TCEQ has interpreted 30 TAC § 116.161 to not prohibit an increase in ozone precursors which may impact an ozone nonattainment area.

This is not to imply that possible contributions to ozone are not reviewed during the air permitting process. In this instance, the Applicant performed an ozone analysis consistent with TCEQ modeling guidance. The ozone analysis conducted by the Applicant shows that the proposed project is ozone-neutral at the site. Based on historical analyses using the Empirical Kinetic Modeling Approach (EKMA) model, the NO_x-dominated proposed project would not be expected to have a discernible impact on the maximum ozone concentration in the area.²²

Similarly, by declining to specify significance increments for photochemical oxidants, EPA did not reason that the significance level for ozone should be zero, but rather that the

²² ED Ex. 17, p. 5.

“atmospheric simulation models are not adequate to predict the air quality impact of a single source of volatile organic compounds (VOC).”²³ Similarly, when evaluating exemptions (i.e., *de minimus* values) from an air quality impact analysis for emissions whose maximum air quality impacts would be demonstrably below the values in the rule, EPA did not set a *de minimus* level for ozone, but rather set one for the ozone precursors – NO_x and VOC – to determine whether the rule would require an ambient impact analysis.²⁴ Therefore, the ED’s interpretation that the “cause or contribute to” standard can include insignificant additions to a NAAQS without those additions legally violating the NAAQS is a reasonable interpretation under the rules.²⁵

9. Unregulated substances.

The ED re-urges his argument from the ED’s Replies to Closings that a BACT review is not required for CO₂ with several clarifications based on exceptions filed by the Protestants.

First, as noted in the ED’s Reply to Closings, the U. S. Supreme Court in *Massachusetts* found

²³ 44 Fed. Reg. 3274, 3277 (January 16, 1979.)

²⁴ 45 Fed. Reg. 52676, 52706 (August 7, 1980); 40 CFR § 51.166(i)(5)(e), footnote 1, (July 1, 2008 ed.). The development of significant impact levels in part 51, Appendix S, reflected the same limitation of developing standards for photochemical oxidants. As part of the implementation of 40 CFR part 51, EPA issued an “Interpretive Ruling for Implementation of the Requirements of 40 CFR 51.18. (Ruling)” [41 Fed. Reg. 55524, 55528 (12/01/1976).] In revising its Ruling in 1979 and including it as Appendix S to part 51, EPA included “significance levels” that were generally based on the Class I PSD increments in section 163 of the CAA. [44 Fed. Reg. 3274, 3277 and 3283] EPA stated: “A new or modified source will not be considered to cause or contribute to a violation of an NAAQS if the air quality impact of the source is less than the specified significance levels.” [44 Fed. Reg. 3274, 3277]. These significance levels are the same as those included in the 1978 Final Notice for the part 51 rules in response to the comment on modeling impacts. Furthermore, Appendix S provided that there were no significance increments applicable for hydrocarbons and photochemical oxidants. [44 Fed. Reg. 3274, 3282]. In its discussion of the changes to Appendix S, EPA concluded:

Significance increments are not specified for photochemical oxidants, since atmospheric simulation models are not adequate to predict the air quality impact of a single source of volatile organic compounds (VOC). [44 Fed. Reg. 3274, 3277].

²⁵ *Blue Skies Allowance v. Tex. Comm’n on Env’tl. Quality*, 283 S.W.3d 525, 531 (Tex. App. – Austin, 2009). The court stated: “(w)e believe that this interpretation is reasonable, consistent, and strikes an appropriate balance between protecting air quality and encouraging economic growth.” *Id.*

that greenhouse gases fit within the definition of "air pollution" and that EPA has the *authority* to regulate those emissions from new motor vehicles. Therefore, despite Sierra Club's argument, the *Massachusetts* opinion is limited solely to the petition filed pursuant to section 202 of the Clean Air Act related to motor vehicle emissions standards. There is no legal rationale for extending the Court's opinion as Sierra Club suggests.

Second, Protestants have argued that other permitting agencies and states have *denied* permit applications for failure to consider CO₂/greenhouse gas emissions. However, this declaration overstates the facts at least with respect to the issue of applications being denied. In the primary case cited by Protestants, *Desert Rock*, the EAB *remanded* the applications back to the permitting agencies for, inter alia, development of the administrative record on whether to include a BACT limit for CO₂.²⁶ Similarly, the second application cited by the Protestants was also remanded, and the remand was predicated specifically on the reasoning and precedent in the *Desert Rock* application.²⁷

Third, in the application of Longleaf Energy Associates, LLC to construct and operate a 1200 megawatt coal-fired power plant in Early County, Georgia, the Fulton County superior court reversed and vacated an ALJ's final decision on the grounds that, inter alia, the Georgia

²⁶ *In re Deseret Power Electric Cooperative*, slip op. at 5, PSD Permit No. PSD-OU-0002-4.00, PSD Appeal No. 07-03 (November 13, 2008). "By our holding today, we do not conclude that the CAA (or an historical Agency interpretation) requires the Region to impose a CO₂ BACT limit. Instead, we conclude that the record does not support the Region's proffered reason for not imposing a CO₂ BACT limit – that although EPA initially could have interpreted the CAA to require a CO₂ BACT limit, the Region can no longer do so because of an historical interpretation." (emphasis added). at slip op. at 9.

²⁷ *In re Northern Michigan University Ripley Heating Plant*, slip op. at 31, PSD Permit No. 60-07, PSD Appeal No. 08-02 (February 18, 2009).

SIP "required the EPD to control the power plant's CO₂ emissions using BACT."²⁸ The Georgia Court of Appeals reversed this ruling and concluded that *Massachusetts v. EPA* did not mandate the superior court's ruling, EPA has not issued any findings pursuant to its proposed endangerment finding, and that EPA had not "exercised its authority pursuant to *Massachusetts v. EPA* to regulate CO₂ emissions."²⁹

10. BACT.

While the ED agrees that the current definition of BACT is not incorporated into the SIP, the record reflects that TCEQ has a fully-approved BACT review process.³⁰ Regarding Sierra Club's arguments on the completeness of the BACT review, the ED re-urges the argument presenting in the ED's Closings and Replies to Closings that specify the review conducted by the ED satisfies the requirements of all applicable state and federal rules.

²⁸ *Longleaf Energy Associates, LLC v. Friends of the Chattahoochee, Inc.*, 2009 WL 1929192, *2 (Ga. App. 2009).

²⁹ *Id.*

³⁰ ED Ex. 1, p. 10. See 57 Fed. Reg. 28093 (June 24, 1992); and 54 Fed. Reg. 52823 (December 22, 1989).

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V. Conclusion.

Based on evidence admitted and disputed issues identified in the record, the Executive Director contends that all procedures and analysis required for an air quality permit review were followed in accordance with applicable rules and guidance established by the TCEQ and EPA. Therefore, the TCEQ Executive Director stands by his preliminary decision to issue the permit for the NRG Limestone 3 Project.

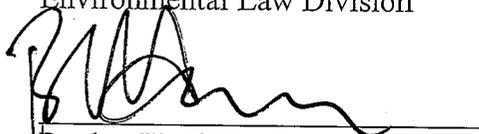
Respectfully Submitted,

Texas Commission on Environmental Quality

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CERTIFICATE OF SERVICE

I hereby certify that on this the 23rd day of July, 2009, a true and correct copy of the foregoing has been served on all attorneys of record by the undersigned via hand delivery, sent by U.S. mail, facsimile, and/or e-mail to the attached Service List.



Booker Harrison

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