

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



Garrett T. Arthur, *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 21, 2022

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

RE: **EXFLUOR RESEARCH CORPORATION (APPLICANT)**
TCEQ DOCKET NO. 2022-1552-AIR

Dear Ms. Gharis:

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

Sincerely,

A handwritten signature in cursive script that reads "Pranjal".

Pranjal M. Mehta, Attorney
Assistant Public Interest Counsel

cc: Mailing List

DOCKET NO. 2022-1552-AIR

**EXFLUOR RESEARCH
CORPORATION
AIR PERMIT 165848**

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**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

**THE OFFICE OF PUBLIC INTEREST COUNSEL'S RESPONSE
TO HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION**

To the Members of the Texas Commission on Environmental Quality:

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

I. Summary of Position

For the reasons stated herein, OPIC respectfully recommends the Commission grant the hearing requests from the North San Gabriel Alliance, Elizabeth Friou, Suzanne Johnson, Charles McCormick, Patricia Mulvihill, Sandra Thurman, Brittany Varner, Peggy and Harold Wardlaw, Mike and Shannon White-Shubert, and Haziell Williams, refer the relevant and material issues specified in Section IV.G to the State Office of Administrative Hearings (SOAH) for a contested case hearing, and deny the remaining hearing requests and all pending requests for reconsideration.

II. Background

On July 9, 2021, Exflor Research Corporation (Applicant) applied to TCEQ for a new Air Permit 165848 that would authorize the Applicant to construct the Exflor Research facility (facility). The facility would be located at 1100 County Road (CR) 236, Florence, Williamson County. Contaminants authorized under the draft permit include hydrogen fluorides, carbon monoxide, particulate matter, hazardous air pollutants, nitrogen oxides, and organic compounds.

The permit application was received on July 9, 2021 and declared administratively complete on July 14, 2021. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on July 28, 2021 in the *Williamson County Sun*, and in Spanish on July 29, 2021 in *El Mundo*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published in English on March 6, 2022, in the *Williamson County Sun*, and in Spanish on March 10, 2022 in *El Mundo*. A public meeting was held June 16, 2022, in Florence. The public comment period closed June 20, 2022, and the Executive Director's (ED) Response to Comments (RTC) was mailed September 13, 2022. The deadline to submit hearing requests and requests for reconsideration was October 13, 2022.

The Commission received timely hearing requests from North San Gabriel Alliance, Nicole Bauer, Ann and Thomas Beville, Terry Cook, Sheryl Farley, Elizabeth Friou, Kelly Heath, Suzanne Johnson, Catherine Johnston, Charles McCormick, Erin McCormick, Joyce McCormick, Nickolas McCormick, Henry Mulvihill, Patricia Mulvihill, Joe Pacheco, Chris Peyton, Renee Peyton,

Sandra Thurman, Brittany Varner, Harold Wardlaw, Peggy Wardlaw, Shannon White-Shubert, and Haziell Williams. Also, the Commission received timely requests for reconsideration from North San Gabriel Alliance, Nicole Bauer, Jillian Gabriel, Richard Grabish, Alycen Malone, Timothy Mcdaniel, Karen Milone, Jennifer Spies, and Mike and Shannon White-Shubert.

III. Applicable Law

A. Hearing Requests

This application was filed on or after September 1, 2015, and is therefore subject to Senate Bill 709, Tex. S.B. 709, 84th Leg., R.S. (2015) (SB 709). For SB 709 applications, Texas Water Code Section 5.115(a-1)(2)(B) provides the Commission may not find that a hearing requestor is an affected person unless the hearing requestor timely submitted comments on the application. Texas Government Code Section 2003.047(e-1) further provides that each issue referred by the Commission must have been raised by an affected person in a timely comment filed by that affected person. The Commission's Chapter 55 rules implement these statutory requirements and other provisions of SB 709.

Under Title 30, Texas Administrative Code (TAC) § 55.201(c), a hearing request by an affected person must be in writing, must be timely filed, may not be based on an issue raised solely in a public comment which has been withdrawn, and, for applications filed on or after September 1, 2015, must be based only on the affected person's timely comments.

Section 55.201(d) states that 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;
- (4) for applications filed on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor 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 ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, and list any disputed issues of law; 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;
- (6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application that were not withdrawn; and
- (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

Under § 55.203(d), to determine whether a person is an affected person for the purpose of granting a hearing request for an application filed on or after September 1, 2015, the Commission may also consider the following:

- (1) the merits of the underlying application and supporting documentation in the administrative record, including whether the application meets the requirements for permit issuance;
- (2) the analysis and opinions of the ED; and
- (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.

Under 30 TAC § 55.205(b), a hearing request by a group or association may not be granted unless all of the following requirements are met:

- (1) comments on the application are timely submitted by the group or association;
- (2) the request identifies, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right;
- (3) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (4) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

For an application filed on or after September 1, 2015, § 55.211(c)(2)(A)(ii) provides that a hearing request made by an affected person shall be granted if the request raises disputed issues of fact that were raised by the affected person during the comment period, that were not withdrawn by filing a withdrawal letter with the Chief Clerk prior to the filing of the ED's RTC, and that are relevant and material to the Commission's decision on the application.

Under § 55.211(c)(2)(B)–(D), the hearing request, to be granted, must also be timely filed with the Chief Clerk, pursuant to a right to hearing authorized by law, and comply with the requirements of § 55.201.

B. Requests for Reconsideration

Any person may file a request for reconsideration of the ED's decision under 30 TAC § 55.201(e). The request must be in writing and filed with the Chief Clerk no later than 30 days after the Chief Clerk mails the ED's decision and RTC. The request must expressly state that the person is requesting reconsideration of the decision and give reasons why the decision should be reconsidered.

IV. Analysis of Hearing Requests

A. Whether the requestors are affected persons

North San Gabriel Alliance

The North San Gabriel Alliance (NSGA) submitted timely comments and hearing requests.¹ NSGA is a non-profit organization that works to protect the

¹ The hearing requests were submitted on October 13, 2022, June 16, 2022, June 3, 2022, and April 1, 2022 by attorney Lauren Ice.

natural environment, homes, crops, animals, and property of people who live, work, farm, ranch, and recreate in the area of the North Fork of the San Gabriel River, in Williamson and Burnet Counties.

As required for group standing under 30 TAC § 55.205(b), NSGA timely submitted comments; the interests NSGA seeks to protect are germane to its purpose; neither the claim asserted nor the relief requested requires the participation of individual NSGA members; and NSGA's hearing request identifies, by name and address, members who would otherwise have standing to request a hearing in their own right. The hearing requests name Patricia Mulvihill, Bryce McCormick, Ann Friou, Charles Williams, Jr. and Haziell Williams, and Peggy Wardlaw as the group members who would be adversely affected by the draft permit. As discussed below, Patricia Mulvihill, Haziell Williams, and Peggy Wardlaw would qualify individually as affected persons in this matter. Therefore, OPIC finds that NSGA meets the requirements for group standing and qualifies as an affected person.

Individuals Within Close Proximity to the Facility

Elizabeth Friou stated that she owns two land parcels directly across the street from the facility. Ms. Friou uses her property for ranching operations. She suffers from asthma and preexisting health conditions and is concerned that her air quality, health, the health of her employees and livestock, and her ability to safely use and enjoy the property will be adversely impacted. The ED's map shows that Ms. Friou is located approximately 0.1 miles from the facility.

Suzanne Johnson stated that she lives approximately 1000 feet from the facility. She is concerned that her air quality, health, and health of her family, pets, and livestock will be adversely impacted. The ED's map shows that Ms. Johnson is located approximately 0.3 miles from the facility.

Sandra Thurman stated that she lives 0.28 miles from the facility. She is sensitive to airborne allergies that can cause respiratory issues and is concerned that the air quality and her health will be adversely impacted. The ED's map shows that Ms. Thurman is located approximately 0.63 miles from the facility.

Brittany Varner stated that she owns land exactly 0.4 miles from the facility. Ms. Varner uses her property as a residence and for recreational purposes. She is concerned that her health, health of the family and farm animals, and her ability to safely enjoy her property will be adversely impacted. The ED's map shows that Ms. Varner is located approximately 0.37 miles from the facility.

Peggy and Harold Wardlaw² stated that they own interest in the McCormick Ranch located at 1050 CR 208 and 30-acre parcel located across CR 306. The Wardlaws currently use every part of their property for raising cattle and for recreational activities such as hunting. They are concerned that their air quality, family health, and their ability to safely use and enjoy the property will be adversely impacted. The ED's map shows that McCormick Ranch is located approximately 0.97 miles from the facility.

² Peggy and Harold Wardlaw timely submitted identical hearing requests. Ms. Wardlaw did not submit written comments, however, she submitted oral comments during the public meeting held on June 16, 2022.

Patricia Mulvihill stated that she is a co-trustee for the McCormick Ranch land owned by her children's trust. Ms. Mulvihill and her family currently use this property for recreational purposes. She is sensitive to airborne environmental risks and is concerned that her air quality, family health, and her ability to safely use and enjoy the property will be adversely impacted. As discussed above, the ED's map shows that McCormick Ranch is located approximately 0.97 miles from the facility.

Charles McCormick stated that he owns land on CR 208 approximately 0.6 miles north of the facility. Mr. McCormick and his family use this land for recreational purposes. He is concerned that his air quality and family health will be adversely impacted. As discussed above, the ED's map shows that McCormick Ranch is located approximately 0.97 miles from the facility.

Mike and Shannon White-Shubert stated that their property is located 1,086 feet downhill from the facility. They use every part of their property to raise bees. They spend lot of time outdoors on their property to maintain beehives and trees on their property. They are concerned that their health and health of their pets and bees will be adversely impacted. The ED's map shows that they are located approximately 0.33 miles from the facility.

Haziel Williams stated that she owns two tracts of land within one mile of the facility. Ms. Williams currently uses her property for recreational purposes. Ms. Williams suffers from preexisting health conditions and is sensitive to chemicals in her environment. She is concerned that her air quality, health, and

family's health will be adversely impacted. The ED's map shows that Ms. Williams is located approximately 0.71 miles from the facility.

All these requestors timely submitted comments and hearing requests. Their concerns include air quality, human and animal health effects, and the use and enjoyment of their property. Their relative proximity to the facility, when combined with their concerns regarding air quality, health effects, and use and enjoyment of property, gives them a personal justiciable interest in this matter. Their proximity also indicates that they could be impacted in a manner not common to the general public and distinguishes their personal justiciable interest from an interest common to the general public. Further, the 30 TAC § 55.203 affected person determination factors indicate that these individuals qualify as an affected person. First, their concerns about air quality, health effects, and use and enjoyment of property are interests protected by the law under which this application is being considered. Second, a reasonable relationship exists between those interests and the regulation of air contaminants. Finally, their proximity to the facility increases the likelihood of impacts to their health, safety, and use of property. OPIC finds that all these individuals qualify as affected persons in this matter.

Individuals Located Farther from The Facility

Anne and Thomas Beville Jr. are concerned that their air quality, health, health of the family, pets, and bees that they raise on their property, and their ability to safely enjoy the property will be adversely impacted. The ED's map shows that they are located approximately 10.36 miles from the facility.

Sheryl Farley is concerned that her air quality, family health and health of the livestock, and her ability to safely enjoy her property will be adversely impacted. The ED's map shows that she is located approximately 2.41 miles from the facility.

Kelley Heath is concerned that air quality, family health, and the ability to safely use and enjoy property will be adversely impacted. The ED's map shows that requestor is located approximately 11.97 miles from the facility.

Joe Pacheco is concerned that his air quality and family health will be adversely impacted. The ED's map shows that he is located approximately 4.17 miles from the facility.

Chris and Renee Payton submitted identical hearing requests. They are concerned that their air quality, family health, and their ability to safely enjoy their property will be adversely impacted. The ED's map shows that they are located approximately 9.39 miles from the facility.

All these requestors submitted timely comments and hearing requests. However, at their distance farther from the facility, they lack the proximity necessary to establish a personal justiciable interest which is distinct from interests common to the general public. Without a personal justiciable interest, a hearing requestor cannot qualify as an affected person. Further, the intervening distance diminishes any likelihood that the regulated activity will impact their health, safety, or use of property. Therefore, OPIC finds that these requestors do not qualify as affected persons.

Individuals Who Did Not Raise A Personal Justiciable Interest

Henry Mulvihill Jr. submitted timely comments and a hearing request. His hearing request just references a question and answer discussion during the public meeting held on June 16, 2022 and includes a news link for this reference.

Catherine Johnston submitted timely comments and a hearing request. Her hearing request stated that she would like to request a contested case hearing and included a document submitted to NSGA by Lone Star Chapter Sierra Club regarding urgent health and environmental concerns over polyfluoroalkyl and HF chemicals.

Both hearing requestors do not explain how they have an interest that differs from the general public, as required by 30 TAC § 55.201(d)(2). OPIC finds that both the requestors do not raise personal justiciable interests protected by law under which the application will be considered. 30 TAC § 55.203(a) & (d). Therefore, OPIC cannot find that they qualify as affected persons.

Individuals Who Did Not Submit Timely Comments

Terry Cook submitted a timely hearing request. The hearing request shows Williamson County as the company name and Williamson County's Tax Office address as the address. However, the hearing request does not specify whether it is submitted on behalf of Williamson County.³ Therefore, OPIC considers this hearing request to be an individual hearing request. Terry Cook raised concerns

³ If Williamson County would like to pursue standing in this matter, the County can appear at the SOAH preliminary hearing and seek to be admitted as a party if a hearing is granted. 30 TAC § 55.211(e).

regarding air quality. However, Terry Cook did not submit any comments during the public comment period.

Nicole Bauer, Erin McCormick, Joyce McCormick, and Nickolas McCormick submitted timely hearing requests and raised concerns that their air quality, family health, and ability to safely use and enjoy their property will be adversely impacted. None of these requestors submitted any comments during the public comment period. Under 30 TAC § 55.201(c), a hearing request must be based on the requestor's timely comments. Because these requestors did not submit timely comments, OPIC cannot find that they qualify as affected persons.

B. Which issues raised in the hearing requests are disputed

The following issues are disputed and were raised by affected requestors.

1. Whether the draft permit will adversely affect air quality; human health and welfare, including sensitive receptors with preexisting health conditions; and the environment. (NSGA, Elizabeth Friou, Charles McCormick, Patricia Mulvihill, Sandra Thurman, Brittany Varner, Harold and Peggy Wardlaw, Mike and Shannon White-Shubert, Haziell Williams)
2. Whether the facility would interfere with use and enjoyment of property. (Elizabeth Friou)
3. Whether the draft permit will adversely affect animal life, including endangered species and wildlife; vegetation; and property. (NSGA, Elizabeth Friou, Suzanne Johnson, Mike and Shannon White-Shubert)
4. Whether the air dispersion modeling and evaluation of the surrounding area was adequate. (NSGA, Elizabeth Friou)
5. Whether emissions calculations were correct. (NSGA, Elizabeth Friou)
6. Whether the BACT (best available control technology) analysis was proper, and the draft permit will achieve the use of BACT. (NSGA, Elizabeth Friou)

7. Whether the allowance of chemical flexibility in the draft permit is appropriate. (NSGA, Elizabeth Friou)
8. Whether the draft permit's hours of operations are appropriate. (NSGA, Elizabeth Friou)
9. Whether the draft permit's monitoring and recordkeeping requirements are adequate to ensure compliance. (NSGA, Elizabeth Friou, Charles McCormick)
10. Whether the Applicant's compliance history justifies changes to the draft permit. (NSGA, Elizabeth Friou)
11. Whether the risk management plan requirement in the draft permit is adequate. (NSGA, Elizabeth Friou)
12. Whether the operations authorized under the draft permit would adversely impact local waterways, groundwater, and surrounding water wells. (Charles McCormick, Brittany Varner, Harold and Peggy Wardlaw, Haziell Williams)

C. Whether the dispute involves questions of fact or of law

All of the issues involve questions of fact.

D. Whether the issues were raised during the public comment period

The issues listed above in Section IV.B were all raised during the public comment period.

E. Whether the hearing requests are based on issues raised solely in public comments which have been withdrawn

None of the hearing requests are based on issues raised solely in public comments which have been withdrawn.

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

Air Quality and Health Effects

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. TEX. HEALTH & SAFETY CODE § 382.0518(b)(2). 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. TEX. HEALTH & SAFETY CODE § 382.002(a). Therefore, Issue No. 1 regarding air quality and human health and Issue Nos. 4, 5, 7, 8, 9, 10, and 11 are relevant and material to the Commission's decision under the Texas Clean Air Act (Texas Health and Safety Code, Chapter 382) and TCEQ Rules (Texas Administrative Code, Title 30, Part 1), including Chapters 101, 112, 113, and 116.

Nuisance, Animal Life, Vegetation, and Normal Use and Enjoyment of Property

Applicant's proposed emissions must meet the secondary National Ambient Air Quality Standards (NAAQS), which provide public welfare protection, including protection against damage to animals, crops, vegetation, and buildings. Applicant must also comply with the TCEQ rule concerning nuisance, which states, "No person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect

human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." 30 TAC § 101.4. Therefore, Issue Nos. 2 and 3 are relevant and material to the Commission's decision on this application.

Best Available Control Technology

Under the Texas Clean Air Act, Applicant is required to use BACT. TEX. HEALTH & SAFETY CODE § 382.0518(b)(1). Therefore, Issue No. 6 regarding BACT analysis and the use of BACT is relevant and material to the Commission's decision on this application.

Compliance History

The concerns regarding compliance history of the Applicant are relevant material under the Texas Water Code § 5.754(i). Therefore, Issue No. 10 is relevant and material.

Water Quality

The water quality issue falls outside the scope of review of this application for an air permit. Therefore, Issue No. 12 is not relevant and material to the decision on this application.

G. Issues Recommended for Referral

For the reasons stated above, OPIC recommends referral of the following issues.

1. Whether the draft permit will adversely affect air quality; human health and welfare, including sensitive receptors with preexisting health conditions; and the environment.
2. Whether the facility would interfere with use and enjoyment of property.

3. Whether the draft permit will adversely affect animal life, including endangered species and wildlife; vegetation; and property.
4. Whether the air dispersion modeling and evaluation of the surrounding area was adequate.
5. Whether emissions calculations were correct.
6. Whether the BACT (best available control technology) analysis was proper, and the draft permit will achieve the use of BACT.
7. Whether the allowance of chemical flexibility in the draft permit is appropriate.
8. Whether the draft permit's hours of operations are appropriate.
9. Whether the draft permit's monitoring and recordkeeping requirements are adequate to ensure compliance.
10. Whether the Applicant's compliance history justifies changes to the draft permit.
11. Whether the risk management plan requirement in the draft permit is adequate.

H. Maximum expected duration for the contested case hearing

Commission rule 30 TAC § 50.115(d) requires that any Commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides that, for applications filed on or after September 1, 2015, the administrative law judge must conclude the hearing and provide a proposal for decision by the 180th day after the first day of the preliminary hearing, or a date specified by the Commission, whichever is earlier. To assist the Commission in setting a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC § 55.209(e)(7), OPIC estimates

that the maximum expected duration of a hearing on this application should be 180 days from the first day of the preliminary hearing until the proposal for decision is issued.

V. Analysis of Requests for Reconsideration

The Commission received timely-filed requests for reconsideration from NSGA, Nicole Bauer, Jillian Gabriel, Richard Grabish, Alycen Malone, Timothy Mcdaniel, Karen Milone, Jennifer Spies, and Mike and Shannon Shannon White-Shubert. These requests raise concerns regarding potential impact on air quality, water quality, human health and welfare, environment, wildlife, livestock, and property values. The TCEQ does not have jurisdiction to consider concerns regarding property values. As discussed above, the water quality issue falls outside the scope of review of this application for an air permit. The remaining issues are within the Commission's jurisdiction to address in proceedings on this application. However, an evidentiary record would be necessary for OPIC to make a recommendation to the Commission as to whether the ED's decision should be reconsidered. At this time, OPIC is recommending a hearing on these issues, but prior to development of an evidentiary record, OPIC cannot recommend reversal of the ED's decision. Therefore, OPIC respectfully recommends denial of all pending requests for reconsideration.


VI. Conclusion

OPIC respectfully recommends the Commission find that the North San Gabriel Alliance, Elizabeth Friou, Suzanne Johnson, Charles McCormick,

Patricia Mulvihill, Sandra Thurman, Brittany Varner, Peggy and Harold Wardlaw, Mike and Shannon White-Shubert, and Haziell Williams are affected persons and grant their hearing requests. OPIC further recommends the Commission refer the relevant and material issues listed in Section IV.G for a contested case hearing at SOAH with a maximum duration of 180 days. Finally, OPIC respectfully recommends the Commission deny the remaining hearing requests and requests for reconsideration.


Respectfully submitted,

Garrett T. Arthur
Public Interest Counsel

By 
Pranjal M. Mehta
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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2022, 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.


Pranjal M. Mehta

MAILING LIST
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TCEQ DOCKET NO. 2022-1552-AIR

FOR THE APPLICANT

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FOR ALTERNATIVE DISPUTE
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REQUESTERS:

See attached list.

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