

Brooke T. Paup, *Chairwoman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 4, 2025

Via Electronic Filing  
The Honorable Rachelle Nicolette Robles  
State Office of Administrative Hearings  
P.O. Box 13025  
Austin, Texas 78711-3025

Re: Patrick K. Morah  
SOAH Docket No. 582-24-23709  
TCEQ Docket No. 2022-1641-PST-E  
Executive Director's Suggested Modification to Proposal for Decision

Dear Judge Robles:

Enclosed please find the Executive Director's Suggested Modification to Proposal for Decision, regarding the above-referenced case. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "TP Ellis".

Taylor Pack Ellis, Staff Attorney  
Texas Commission on Environmental Quality  
Office of Legal Services, Litigation Division  
[Taylor.Packellis@tceq.texas.gov](mailto:Taylor.Packellis@tceq.texas.gov)

Enclosure

cc: Patrick K. Morah  
Eli Martinez, Office of the Public Interest Counsel  
Tiffany Chu, Enforcement Division

**SOAH DOCKET NO. 582-24-23709  
TCEQ DOCKET NO. 2022-1641-PST-E**

<b>EXECUTIVE DIRECTOR OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY, PETITIONER VS. PATRICK K. MORAH, RESPONDENT</b>	<b>§ § § § § § §</b>	<b>BEFORE THE   STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
---	--	--

**EXECUTIVE DIRECTOR’S SUGGESTED MODIFICATION TO PROPOSAL FOR DECISION  
TO THE HONORABLE JUDGE RACHELLE NICOLETTE ROBLES:**

COMES NOW, the Executive Director (“ED”) of the Texas Commission on Environmental Quality, by and through her attorney, Taylor Pack Ellis, and files this “Executive Director’s Suggested Modification to Proposal for Decision” (“Submission”) in accordance with instructions given by the Administrative Law Judge (“ALJ”) in the letter provided with the Proposal for Decision (“PFD”) on May 15, 2025.

**I. SUGGESTED MODIFICATION**

The Executive Director suggests the ALJ’s Proposed Order be modified to name Brooke T. Paup, as Chairwoman for the Commission.

**II. CONCLUSION**

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

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel  
Executive Director

Phillip Ledbetter, Director  
Office of Legal Services

Gitanjali Yadav, Deputy Director  
Litigation Division



---

Taylor Pack Ellis  
State Bar of Texas No. 24094881  
Litigation Division, MC 175  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512)239-3400  
[Taylor.PackEllis@tceq.texas.gov](mailto:Taylor.PackEllis@tceq.texas.gov)

### CERTIFICATE OF SERVICE

I hereby certify that on this 4<sup>th</sup> day of June 2025, the foregoing original "Executive Director's Suggested Modification to Proposal for Decision" ("Submission") was filed with the Chief Clerk, Texas Commission on Environmental Quality, Austin, Texas.

I further certify that on this day, true and correct copies of the foregoing Submission were sent to the following persons via the methods indicated below:

The Honorable Rachelle Nicolette Robles  
State Office of Administrative Hearings  
P.O. Box 13025  
Austin, Texas 78711-3025

Via Electronic Filing

Patrick K. Morah, Owner  
Top 10 Food Mart  
9002 South Braeswood Boulevard  
Houston, Texas 77074  
[kossy88@yahoo.com](mailto:kossy88@yahoo.com)

Via Electronic Mail

Eli Martinez  
Office of the Public Interest Counsel  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087  
[eli.martinez@tceq.texas.gov](mailto:eli.martinez@tceq.texas.gov)

Via Electronic Mail



---

Taylor Pack Ellis, Staff Attorney  
Texas Commission on Environmental Quality  
Office of Legal Services, Litigation Division