

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 6, 2022

TO: All interested persons.

RE: Entergy Texas, Inc.
Air Quality Permit Nos. 166032, GHGPSDTX210, and PSDTX1598

Decision of the Executive Director.

The executive director has made a decision that the above-referenced permit application meets the requirements of applicable law. **This decision does not authorize construction or operation of any proposed facilities.** This decision will be considered by the commissioners at a regularly scheduled public meeting before any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting.

Enclosed with this letter are instructions to view the Executive Director's Response to Public Comment (RTC) on the Internet. Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov. A complete copy of the RTC (including the mailing list), complete application, draft permit and related documents, including public comments, are available for review at the TCEQ Central Office. Additionally, the permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ Central Office, the TCEQ Beaumont Regional Office, and at the Bridge City Library, 101 Parkside Drive, Bridge City, Orange County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Beaumont Regional Office, 3870 Eastex Freeway, Beaumont, Texas.

If you disagree with the executive director's decision, and you believe you are an "affected person" as defined below, you may request a contested case hearing. In addition, anyone may request reconsideration of the executive director's decision. The procedures for the commission's evaluation of hearing requests/requests for reconsideration are located in 30 Texas Administrative Code Chapter 55, Subchapter F. A brief description of the procedures for these two types of requests follows.

How to Request a Contested Case Hearing.

It is important that your request include all the information that supports your right to a contested case hearing. You must demonstrate that you meet the applicable legal

requirements to have your hearing request granted. The commission's consideration of your request will be based on the information you provide.

The request must include the following:

- (1) Your name, address, daytime telephone number, and, if possible, a fax number.
- (2) If the request is made by a group or association, the request must identify:
 - (A) one person by name, address, daytime telephone number, and, if possible, the fax number, of the person who will be responsible for receiving all communications and documents for the group;
 - (B) the comments on the application submitted by the group that are the basis of the hearing request; and
 - (C) by name and physical address one or more members of the group that would otherwise have standing to request a hearing in their own right. The interests the group seeks to protect must relate to the organization's purpose. Neither the claim asserted nor the relief requested must require the participation of the individual members in the case.
- (3) The name of the applicant, the permit number and other numbers listed above so that your request may be processed properly.
- (4) A statement clearly expressing that you are requesting a contested case hearing. For example, the following statement would be sufficient: "I request a contested case hearing."

Your request must demonstrate that you are an **"affected person."** 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. Your request must describe how and why you would be adversely affected by the proposed facility or activity in a manner not common to the general public. For example, to the extent your request is based on these concerns, you should describe the likely impact on your health, safety, or uses of your property which may be adversely affected by the proposed facility or activities. To demonstrate that you have a personal justiciable interest, you must state, as specifically as you are able, your location and the distance between your location and the proposed facility or activities. A person who may be affected by emissions of air contaminants from the facility is entitled to request a contested case hearing.

Your request must raise disputed issues of fact that are relevant and material to the commission's decision on this application that were raised **by you** during the public comment period. The request cannot be based solely on issues raised in comments that you have withdrawn.

To facilitate the commission's determination of the number and scope of issues to be referred to hearing, you should: 1) specify any of the executive director's responses to

your comments that you dispute; 2) the factual basis of the dispute; and 3) list any disputed issues of law.

How to Request Reconsideration of the Executive Director's Decision.

Unlike a request for a contested case hearing, anyone may request reconsideration of the executive director's decision. A request for reconsideration should contain your name, address, daytime phone number, and, if possible, your fax number. The request must state that you are requesting reconsideration of the executive director's decision, and must explain why you believe the decision should be reconsidered.

Deadline for Submitting Requests.

A request for a contested case hearing or reconsideration of the executive director's decision must be **received by** the Chief Clerk's office no later than **30 calendar days** after the date of this letter. You may submit your request electronically at www.tceq.texas.gov/agency/decisions/cc/comments.html or by mail to the following address:

Laurie Gharis, Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

Processing of Requests.

Timely requests for a contested case hearing or for reconsideration of the executive director's decision will be referred to the TCEQ's Alternative Dispute Resolution Program and set on the agenda of one of the commission's regularly scheduled meetings. Additional instructions explaining these procedures will be sent to the attached mailing list when this meeting has been scheduled.

How to Obtain Additional Information.

If you have any questions or need additional information about the procedures described in this letter, please call the Public Participation and Education Program, toll free, at 1-800-687-4040.

Sincerely,



Laurie Gharis
Chief Clerk

LG/erg

Enclosure

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT
for
Entergy Texas, Inc.
Air Quality Permit Nos. 166032, GHGPSDTX210, and PSDTX1598

The Executive Director has made the Response to Public Comment (RTC) for the application by Entergy Texas, Inc. for Air Quality Permit Nos. 166032, GHGPSDTX210, and PSDTX1598 available for viewing on the Internet. You may view and print the document by visiting the TCEQ Commissioners' Integrated Database at the following link:

<https://www.tceq.texas.gov/goto/cid>

In order to view the RTC at the link above, enter the TCEQ ID Number for this application (166032, GHGPSDTX210, or PSDTX1598) and click the "Search" button. The search results will display a link to the RTC.

Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov.

Additional Information

For more information on the public participation process, you may contact the Office of the Public Interest Counsel at (512) 239-6363 or call the Public Education Program, toll free, at (800) 687-4040.

A complete copy of the RTC (including the mailing list), the complete application, the draft permit, and related documents, including comments, are available for review at the TCEQ Central Office in Austin, Texas. Additionally, the permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ Central Office, the TCEQ Beaumont Regional Office, and at the Bridge City Library, 101 Parkside Drive, Bridge City, Orange County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Beaumont Regional Office, 3870 Eastex Freeway, Beaumont, Texas.

MAILING LIST
for
Entergy Texas, Inc.
Air Quality Permit Nos. 166032, GHGPSDTX210, and PSDTX1598

FOR THE APPLICANT:

Jason Willis, Vice President Power Plant
Operations
Entergy Texas, Inc.
10055 Grogans Mill Road
The Woodlands, Texas 77380

Annisa White, Environmental Analyst
Entergy Texas, Inc.
10055 Grogans Mill Road
The Woodlands, Texas 77380

INTERESTED PERSONS:

See attached list.

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

Ryan Vise, Deputy Director
Texas Commission on Environmental
Quality
External Relations Division
Public Education Program MC-108
P.O. Box 13087
Austin, Texas 78711-3087

Contessa Gay, Staff Attorney
Texas Commission on Environmental
Quality
Environmental Law Division MC-173
P.O. Box 13087
Austin, Texas 78711-3087

Huy Pham, Technical Staff
Texas Commission on Environmental
Quality
Air Permits Division MC-163
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL
via electronic mail:

Garrett T. Arthur, Attorney
Texas Commission on Environmental
Quality
Public Interest Counsel MC-103
P.O. Box 13087
Austin, Texas 78711-3087

FOR THE CHIEF CLERK
via electronic mail:

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

AKBARI , ARIANA
108 1ST AVE
NEDERLAND TX 77627-3365

BEARD JR , JOHN
PO BOX 1033
PORT ARTHUR TX 77641-1033

BERNARD , MARY C
BIG THICKET BIOSPHERE RESERVE
6725 WEDGEWOOD DR
LUMBERTON TX 77657-7876

BUCHANAN , ELLEN
PO BOX 1489
KOUNTZE TX 77625-1489

COX , COLIN
ENVIRONMENTAL INTEGRITY PROJECT
1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

COX , COLIN
ENVIRONMENTAL INTEGRITY PROJECT
1405 GARNER AVE
AUSTIN TX 78704-2846

IGLESIAS , JORDAN
6808 CRUZ ST
AUSTIN TX 78741-3524

JACOBY , JEFFREY DOUGLAS
TEXAS CAMPAIGN FOR THE ENVIRONMENT
PO BOX 42278
AUSTIN TX 78704-0038

JACOBY , JEFFREY DOUGLAS
TEXAS CAMPAIGN FOR THE ENVIRONMENT
STE 120
105 W RIVERSIDE DR
AUSTIN TX 78704-1247

PABST , EMMA
SIERRA CLUB
6406 N INTERSTATE 35
AUSTIN TX 78752-4352

PABST , EMMA
1180 RED BUD LN
ROUND ROCK TX 78664-9786

PEDERSEN , COURTNEY
APT 101
4040 CROW RD
BEAUMONT TX 77706-7000

SMITH , JOSHUA
SIERRA CLUB
STE 1300
2101 WEBSTER ST
OAKLAND CA 94612-3011

STELLY , TERRY D
227 N 30TH ST
NEDERLAND TX 77627-7031

WHITE , ANNISA
4TH FL
10055 GROGANS MILL RD
THE WOODLANDS TX 77380-1059

WILLIAMS , COREY
2520 CAROLINE ST
HOUSTON TX 77004-1000

TCEQ AIR QUALITY PERMIT NUMBERS 166032, GHGPSDTX210, and PSDTX1598

APPLICATION BY	§	BEFORE THE
ENTERGY TEXAS, INC.	§	TEXAS COMMISSION ON
ORANGE COUNTY ADVANCED	§	ENVIRONMENTAL QUALITY
POWER STATION	§	
ORANGE, ORANGE COUNTY		

EXECUTIVE DIRECTOR’S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director’s preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. A list of all persons who submitted timely comments to the Office of the Chief Clerk (OCC) is included as Appendix A. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process, please call the TCEQ Public Education Program at 1-800-687-4040. General information about the TCEQ can be found at our website at www.tceq.texas.gov.

BACKGROUND

Description of Power Station

Entergy Texas, Inc. (Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA) § 382.0518. This will authorize the construction of a new facility that may emit air contaminants.

This permit will authorize the Applicant to construct the Orange County Advanced Power Station. The plant is to be located at 1000 Power House Road, Orange, Orange County, Texas 77630. Contaminants authorized under this permit include carbon monoxide (CO), organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less (PM₁₀ and PM_{2.5}, respectively), sulfuric acid mist, greenhouse gases (GHGs), nitrogen oxides (NO_x), hazardous air pollutants (HAPs), sulfur dioxide (SO₂), aqueous ammonia (NH₃), and hydrogen (H).

Procedural Background

Before work is begun on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain a permit from the commission. This permit application is for an initial issuance of Air Quality Permit Numbers 166032, GHGPSDTX210, and PSDTX1598.

The permit application was received on July 29, 2021 and declared administratively complete on August 04, 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 August 14, 2021, in the *Lufkin Daily News*, and in Spanish on August 15, 2021 in *La Leguna*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on June 29, 2022, in English in the *Orange Leader* and in Spanish on June 29, 2022, in *El Perico*. A public meeting was held on August 1, 2022 at Lamar State College Orange, Student Center, 407 Green Avenue, Orange, Texas 77630. The notice of public meeting was mailed to persons on the mailing list on July 1, 2022. The public comment period ended on August 1, 2022. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

COMMENTS AND RESPONSES

COMMENT 1: Health Effects / Air Quality / Cumulative Effects / Modeling

Commenters expressed concern regarding the effect of the emissions from the proposed project on the air quality and health of people, particularly sensitive populations such as the elderly, children, and people with existing medical conditions. Commenters are concerned that prevailing winds will carry emissions directly to nearby schools. Commenters are also concerned that the proposed project will increase ozone levels, stating that emissions will drift into nonattainment areas, exacerbating failing air quality. Commenters expressed further concern that emissions will contribute to a higher level of respiratory illness, asthma, lung cancer, heart disease, nervous system damage, nausea, and difficulty breathing. Commenters are concerned that cumulative effects have not been considered, stating that a comprehensive evaluation of all emissions from the proposed project and nearby facilities should be conducted. Commenters questioned the modeling analysis, expressing concern that there are deficiencies in the modeling which were not addressed. Additionally, commenters are concerned that the Applicant did not complete the final and required air quality modeling. Colin Cox and Joshua Smith expressed concern that the air quality modeling is based on unsupported assumptions, specifically poor emission factors and unverifiable vendor estimates. Mary Bernard asks that the TCEQ produce an emissions inventory of the air pollution that will be caused by the proposed plant, directly, indirectly, and cumulative, over the life of the plant operations.

(Group A, Group B, Colin Cox, Mary Bernard, Emma Pabst, Joshua Smith, and Terry D. Stelly)

RESPONSE 1: The Executive Director is required to review permit applications to ensure they will be protective of human health and the environment. For this type of air permit application, potential impacts to human health and welfare or the environment are determined by comparing the Applicant's proposed air emissions to appropriate state and federal standards and guidelines. These standards and guidelines include the National Ambient Air Quality Standards (NAAQS), TCEQ Effects Screening Levels (ESLs), and TCEQ rules. As described in detail below, the Executive Director determined that the emissions authorized by this permit are protective of both human health and welfare and the environment.

The United States (U.S.) Environmental Protection Agency (EPA) created and continues to evaluate the NAAQS, which include both primary and secondary standards, for pollutants considered harmful to public health and the environment.¹ Primary standards protect public health, including sensitive members of the population such as children, the elderly, and those individuals with preexisting health conditions. Secondary NAAQS protect public welfare and the environment, including animals, crops, vegetation, visibility, and buildings, from any known or anticipated adverse effects from air contaminants. The EPA has set NAAQS for criteria pollutants, which include carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), sulfur dioxide (SO₂), particulate matter less than or equal to 10 microns in aerodynamic diameter (PM₁₀), and PM less than or equal to 2.5 microns in aerodynamic diameter (PM_{2.5}).

The Applicant conducted a NAAQS analysis for CO, PM₁₀, PM_{2.5}, SO₂, and NO₂. The first step of the NAAQS analysis is to compare the proposed modeled emissions against the established de minimis level. Predicted concentrations (GLC_{max}²) below the de minimis level are considered to be so low that they do not require further NAAQS analysis. Results of the de minimis analysis are presented below in Table 1.

¹ See 40 Code of Federal Regulations (CFR) 50.2.

² The GLC_{max} is the maximum ground level concentration predicted by the modeling.

Table 1. Modeling Results for De Minimis Analysis

Pollutant	Averaging Time	GLC _{max} (µg/m ³)	De Minimis (µg/m ³)
CO	1-hr	10872	2000
CO	8-hr	548	500
PM ₁₀	24-hr	3	5
PM ₁₀	Annual	0.3	1
PM _{2.5} (NAAQS)	24-hr	2.4	1.2
PM _{2.5} (NAAQS)	Annual	0.25	0.2
PM _{2.5} (Increment)	24-hr	2.9	1.2
PM _{2.5} (Increment)	Annual	0.27	0.2
SO ₂	1-hr	1.5	7.8
SO ₂	3-hr	3	25
SO ₂	24-hr	1	5
SO ₂	Annual	0.04	1
NO ₂	1-hr	65	7.5
NO ₂	Annual	0.98	1

The pollutants below the de minimis level should not cause or contribute to a violation of the NAAQS and are protective of human health and the environment. The Applicant conducted a full NAAQS analysis for those pollutants above de minimis to account for cumulative effects by including an evaluation of all on-property sources, applicable off-property sources, and representative monitored background concentrations. Results of the NAAQS analysis are presented below in Table 2.

Table 2. Total Concentrations for NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLC _{max} (µg/m ³)	Background (µg/m ³)	Total Conc. = [Background + GLC _{max}] (µg/m ³)	Standard (µg/m ³)
CO	1-hr	8703	1714	10417	40000
CO	8-hr	1378	1444	2822	10000
PM _{2.5}	24-hr	6.4	23	29.4	35
PM _{2.5}	Annual	0.5	9.1	9.6	12
NO ₂	1-hr	85	60	145	188

The total concentration was determined by adding the GLC_{max} to the appropriate background concentration. Background concentrations are obtained from ambient air monitors across the state and are added to the modeled concentration (both on-property and off-property sources) to account for sources not explicitly modeled. The ambient air monitors were selected to ensure that they are representative of the proposed site. The total concentration was then compared to the NAAQS to ensure

that the concentration is below the standard. For any subsequent projects submitted pertaining to this or any other facility in the area, the air quality analysis for that project will have to include the emissions authorized by this project, as well as other applicable off-property sources, if a full impacts analysis is required.

The De Minimis analysis modeling results indicate that 24-hr and annual PM_{2.5} exceed the respective de minimis concentrations and required a PSD increment analysis be conducted. Results of the PSD increment analysis are shown below in Table 3.

Table 3. Results for PSD Increment Analysis

Pollutant	Averaging Time	GLC _{max} (µg/m ³)	Increment (µg/m ³)
PM _{2.5}	24-hr	8.7	9
PM _{2.5}	Annual	2	4

The De Minimis analysis modeling results indicate that 24-hr PM₁₀ and 8-hr CO are below their respective PSD monitoring significance level, as shown below in Table 4.

Table 4. Modeling Results for PSD Monitoring Significance Levels

Pollutant	Averaging Time	GLC _{max} (µg/m ³)	De Minimis (µg/m ³)
PM ₁₀	24-hr	3	10
CO	8-hr	548	575

The Applicant also performed an Ozone (O₃) analysis as part of the PSD Air Quality Analysis (AQA). O₃ is evaluated by its precursors, volatile organic compounds (VOC) and NO_x. For the project VOC and NO_x emissions, the Applicant provided an analysis using EPA methods. The results of the O₃ analysis are shown below in Table 5.

Table 5. Modeling Results for Ozone PSD De Minimis Analysis in Parts per Billion (ppb)

Pollutant	Averaging Time	GLC _{max} (ppb)	De Minimis (ppb)
O ₃	8-hr	0.8	1

As shown above, the results are below the de minimis standard. The NAAQS, PSD, and O₃ analysis results are below the standard for each pollutant, should not cause or contribute to violation of the NAAQS, and are protective of human health and the environment.

ESLs are specific guideline concentrations used in TCEQ’s evaluation of certain pollutants. These guidelines are derived by the TCEQ’s Toxicology Division and are based on a pollutant’s potential to cause adverse health effects, odor nuisances, and effects on vegetation. Health-based ESLs are set below levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. The TCEQ’s Toxicology Division specifically considers the possibility of cumulative and

aggregate exposure when developing the ESL values that are used in air permitting, creating an additional margin of safety that accounts for potential cumulative and aggregate impacts. Adverse health or welfare effects are not expected to occur if the air concentration of a pollutant is below its respective ESL. If an air concentration of a pollutant is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted.

The Applicant conducted a health effects analysis using the Modeling and Effects Review Applicability (MERA) guidance.³ The MERA is a tool to evaluate impacts of non-criteria pollutants. It is a step-by-step process, evaluated on a chemical species by chemical species basis, in which the potential health effects are evaluated against the ESL for the chemical species. The initial steps are simple and conservative, and as the review progresses through the process, the steps require more detail and result in a more refined (less conservative) analysis. If the contaminant meets the criteria of a step, the review of human health and welfare effects for that chemical species is complete and is said to “fall out” of the MERA process at that step because it is protective of human health and welfare. All pollutants, except for those identified below in Table 6, satisfy the MERA criteria and, therefore, are not expected to cause adverse health effects. The following pollutants did not meet the criteria of the MERA guidance document and required further analysis. Site-wide modeling was performed and demonstrated that the predicted concentrations will not exceed the ESL (shown below in Table 6).

Table 6. Health Effects Modeling Results

Pollutant	CAS#	Averaging Time	GLC _{max} (µg/m ³)	ESL (µg/m ³)
ammonia	7664-41-7	1-hr	155	180
benzene	71-43-2	1-hr	146	170
benzene	71-43-2	Annual	1.4	4.5
diesel fuel	68334-30-5	1-hr	97	1000
formaldehyde	50-00-0	1-hr	3	15
C15-30 petroleum lubricating oils, hydrotreated neutral oil-based	72623-86-0	1-hr	43	1000
polycyclic aromatic hydrocarbons	130498-29-2	1-hr	0.2	0.5
sodium hypochlorite	7681-52-9	1-hr	21	50
cadmium	7440-43-9	1-hr	0.02	5.4
cadmium	7440-43-9	Annual	0.0004	0.0033

³ See Air Permit Reviewer Reference Guide - APDG 5874 guidance document.

Because this application has sulfur emissions, the Applicant conducted a State Property Line Analysis (30 TAC Chapter 112) to demonstrate compliance with TCEQ rules for net ground-level concentrations for sulfur dioxide (SO₂), hydrogen sulfide (H₂S), and sulfuric acid (H₂SO₄), as applicable. This analysis demonstrated that resulting air concentrations will not exceed the applicable state standard, as shown below in Table 7.

Table 7. Site-Wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLC _{max} (µg/m ³)	Standard (µg/m ³)
SO ₂	1-hr	365	817
H ₂ SO ₄	1-hr	18	50
H ₂ SO ₄	24-hr	11	15

See Response 8 for concerns regarding application representations and emissions calculations, including concerns regarding deficiency items. In summary, based on the Executive Director's staff review, it is not expected that existing health conditions will worsen, or that there will be adverse health effects on the general public, sensitive subgroups, or the public welfare and the environment as a result of the proposed short-term and long-term emission rates associated with this project.

COMMENT 2: Environment

Commenters expressed concern regarding the effect of the proposed project on the environment, surrounding wildlife, and ecosystems. Terry D. Stelly expressed concern for migratory waterfowl, biological, aquatic, and terrestrial life, soils, vegetation, and visibility.

(Group A and Terry D. Stelly)

RESPONSE 2: The secondary NAAQS are those the EPA Administrator determines are necessary to protect public welfare and the environment, including animals, crops, vegetation, visibility, and structures, from any known or anticipated adverse effects associated with the presence of a contaminant in the ambient air. Because the emissions from this facility should not cause an exceedance of the NAAQS, air emissions from this facility are not expected to adversely impact land, livestock, wildlife, crops, or visibility, nor should emissions interfere with the use and enjoyment of surrounding land or water. See Response 1 for an evaluation of this project's impacts in relation to the NAAQS. In addition, 30 TAC § 101.4 prohibits the discharge of contaminants which may be injurious to, or adversely affect, animal life. When a company operates in compliance with the proposed permit there should be no deterioration of air quality or the generation of dust such that it impacts visibility. While these conditions are not expected if the facility is operated in compliance with the terms of the permit, operators must also comply with 30 TAC § 101.4, which prohibits nuisance conditions.

Compliance with rules and regulations regarding endangered species is handled at the state level by the Texas Parks and Wildlife Department and at the federal level by the United States Fish and Wildlife Service. It is incumbent upon an applicant to request and acquire any additional authorizations that may be required under state or federal law.

COMMENT 3: Water

Commenters expressed concern regarding the negative impacts on water resources due to the proposed project. Commenters also expressed concern regarding the potential impacts to the Gulf of Mexico, Mississippi River, the Texas coastline, and the contamination of groundwater. Nara Wood specifically expressed concern regarding oil slicks and the dead zone in the Gulf.

(Joyce Bowman, Linda Carr, Diane Castro, Bonnie Clements, Jeannie Coggins, Thomas Crofts, Tim Duda, Jo Ann Duman, L. Fielder, Cristina Gonzalez, Beverly Hoff, Maury Jacob, Jeanne Jordan, Susan Lippman, T. Logan, Kate Mathis, Craig Nazor, Emma Pabst, Joe Samples, Carrie Schweitzer, Tria Shaffer, Steven Smith, Kate Smith, Lauren Spear, Terry D. Stelly, Karen Sterling, David Stokes, Carol Vincent, Brian Voris, Jessie Wheat, and Nara Wood)

RESPONSE 3: Although the TCEQ is responsible for the environmental protection of air and water as well as the safe management of waste, this proposed permit will regulate the control and abatement of air emissions only. Therefore, issues regarding water quality or discharge and the handling of waste are not within the scope of this review. However, the Applicant may be required to apply for separate authorizations for water quality, water usage, or the handling of waste.

COMMENT 4: Renewable Energy / Climate Change / Global Warming

Commenters urged the Applicant and TCEQ to invest in and support alternative, clean energy. Commenters also stated fracking should stop and work should be steered away from carbon-based energy and fossil fuels, and instead support green energy, wind farms, and solar farms. Commenters asked the Applicant and TCEQ to look at green or renewable alternatives. Commenters expressed concern about the effects of the project as it relates to climate change and global warming. Terry D. Stelly specifically expressed concern regarding the fuel used at the facility, stating that the proposed emissions indicate the Applicant is utilizing coal, coke, or oil instead of natural gas.

(Group A, Group B, Ariana Akbari, Jeanne Jordan, Susan Lippman, Craig Nazor, Emma Pabst, Marianne Poythress, Joe Samples, Sandy Schmidt, Tria Shaffer, and Terry D. Stelly)

RESPONSE 4: EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there are no NAAQS for GHGs, including no PSD increment. Climate change modeling and evaluations of risks and impacts are typically conducted for changes in emissions that are orders of magnitude larger than the

emissions from individual projects that might be analyzed in permit reviews. Thus, EPA has concluded it would not be meaningful to evaluate impacts of GHG emissions on a local community in the context of a single permit. For these reasons, the TCEQ has determined that an air quality analysis for GHG emissions would provide no meaningful data and has not required the Applicant to perform such an analysis.

Under the jurisdiction established by the Texas Legislature, the TCEQ cannot prohibit a private company from using any product or fuel source as long as such usage does not result in a violation of applicable environmental regulations or the NAAQS. For this specific project, the proposed operation of the plant does not include utilizing coal or coke. Natural gas and hydrogen are the proposed fuel sources. No. 2 fuel oil will be used at the plant to operate an emergency generator, a firewater pump, and fire protection generators. The TCEQ cannot deny a permit if the application demonstrates that all applicable statutes, rules, and regulations will be met. Special conditions and a maximum allowable emission rates table are created to establish limits for the operation of the plant. The permit conditions are developed such that a plant that is operated within the terms and conditions of the permit will operate in compliance with standards outlined in the TCAA and all applicable state and federal rules and regulations. *See* Response 1 for an evaluation of this project's impacts in relation to the NAAQS.

COMMENT 5: Nonattainment / Nonattainment New Source Review Permitting

Commenters expressed concern that the emissions from this project could cause the county to be designated as nonattainment. Commenters questioned whether the project exceeds significant levels triggering Nonattainment New Source Review (NNSR) permitting.

(Group A and Group B)

RESPONSE 5: NNSR permitting is applicable to major sites, defined as a site emitting over the threshold for the nonattainment pollutant in that county. Texas nonattainment area designations are specified in 40 CFR § 81.344. The proposed site is located in Angelina County, which is currently designated as being in attainment or unclassifiable for all pollutants. Because the site is not located in a nonattainment county, the project is not subject to NNSR permitting. *See* Response 1 for an evaluation and determination that emissions would not be causing an exceedance of the NAAQS.

COMMENT 6: Public Notice and Participation

Commenters asked that TCEQ provide the public with notice and opportunity to fully review the permit file to provide more complete comments, further stating that 30 days to evaluate and provide comments is not long enough. Commenters also stated that the response to the deficiency letter was due after the deadline for public comment, specifically stating that this did not provide the public enough time to review the response and provide technical comments on the application. Commenters expressed concern that expediting the project gives the public less time to review the

application and provide comments. Dave Cortex asked for a public meeting in English and in Spanish. Terry D. Stelly expressed concern that the public notice only included emission representations for particulate matter, stating that both the TCEQ and Applicant have not been up front with the public regarding air contaminants that will be submitted in a significant amount.

(Group A, Dave Cortex, and Terry D. Stelly)

RESPONSE 6: TCAA § 382.056 requires that an applicant publish notice. Notice must be published in a newspaper of general circulation in the municipality in which the proposed facility is located or proposed to be located. The notice must include a description of the facility, information on how an affected person may request a public hearing, pollutants the facility will emit, and any other information the TCEQ requires by rule. The commission also requires that notice be published in an alternative language if the elementary or middle school nearest the proposed facility offers a bilingual education program as required by Texas Education Code Chapter 29, Subchapter B. The TCEQ adopted rules for these public notice requirements in 30 TAC § 39.603, Public Notice of Air Quality Applications, Newspaper Notice. As stated above, The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on August 14, 2021, in the *Lufkin Daily News*, and in Spanish on August 15, 2021 in *La Leguna*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on June 29, 2022, in English in the *Orange Leader* and in Spanish on June 29, 2022, in *El Perico*.

To demonstrate compliance with public notice requirements, applicants are required to provide the Office of the Chief Clerk with copies of the published notice and a publisher's affidavit verifying facts related to the publication, including that the newspaper is a paper of general circulation in the municipality in which the proposed facility is located or proposed to be located.

30 TAC § 55.154(c)(2) requires that a public meeting be held if a member of the legislature who represents the general area in which the facility is located requests a public meeting or if the TCEQ Executive Director determines that there is substantial or significant degree of public interest. A public meeting was held on August 01, 2022 at Lamar State College Orange, Student Center, 407 Green Avenue, Orange, Texas 77630. The notice of public meeting was mailed to persons on the mailing list on July 01, 2022. The public comment period ended on August 01, 2022. Although one commenter asked for a public meeting to be in both English and Spanish, there were no other comments indicating an English-Spanish translator was necessary for this meeting.

Any applicant may request to have their application expedited. TCEQ will expedite the review of the application if the applicant can demonstrate eligibility under 30 TAC § 101.600 and remits the appropriate fee. Expedited applications undergo the same level of scrutiny and review as non-expedited applications and follow all air permitting process requirements. Further, the public notice requirements and the

duration of the public notice comment period is the same for both expedited and non-expedited projects. The economic benefit analysis is not part of the administrative or technical review and does not impact the issuance of a permit.

The first public notice comment period ended on September 14, 2021. A Public Information Request (PIR) was received on August 18, 2021. The first Notice of Deficiency (NOD) letter was sent to the Applicant on August 19, 2021. A second PIR was received on August 25, 2021; therefore, the first deficiency letter was included in response to the PIR request. While the first public notice comment period ended on September 14, 2021, the public had an opportunity to submit comments during the duration of both public notice comment periods, specifically until the public meeting on August 1, 2022.

Regarding pollutants represented to be emitted in a significant amount in the NAPD, PM_{2.5} was the only required pollutant to be included because it was the only pollutant that exceeded the PSD De Minimis levels in the modeling.⁴ Only those pollutants considered significant according to PSD rules are listed in NAPD.

COMMENT 7: Access to Permit Documents

Commenters expressed concern that they did not have access to the permit documents and that the available file was incomplete, missing records of communications between the TCEQ and the Applicant, and commenters had concerns regarding a lack of transparency. Group A commenters further expressed concern that the file was not available for viewing at the central office on September 10, 2021. Group A commenters expressed concern that the requested application information was not provided until two days before the comment period ended, stating that this did not provide the public enough time to review the file and submit comments.

(Group A and Terry D. Stelly)

RESPONSE 7: 30 TAC § 39.405 requires an applicant to provide copies of the application and the Executive Director's preliminary decision at a public place in the county in which the facility is located or proposed to be located. The rules also require the public have an opportunity to review and copy these materials. In addition, the application, including any subsequent revisions to the application, must be available for review for the duration of the comment period. The Applicant represented and verified that the application was made available at the Bridge City Library, 101 Parkside Drive, Bridge City, Orange County, Texas 77611. In addition, a copy of the application was also available at the TCEQ Beaumont Regional Office and the TCEQ Central Office.

Finally, a copy of the application and all updates to the application are kept in a file maintained by the permit engineer reviewing the application until the permit is issued. Copies of pending applications held by a permit reviewer are not maintained by the

⁴ See 30 TAC § 39.411(f)(8).

TCEQ Office of the Chief Clerk but can be obtained from the TCEQ Central File Room in Austin. On September 10, 2021, TCEQ was in state of remote working due to the Coronavirus Pandemic. However, arrangements could have been made for the application to be reviewed at the TCEQ Central Office.

COMMENT 8: Application Representations / Disaster Review / Calculations

Commenters expressed concern that the application is incomplete. Commenters stated the Applicant contact information listed in the NORI was not correct. Commenters also expressed concern that a disaster review and risk management plan (RMP) was not included as part of the publicly available application. Commenters further expressed concern that deficiencies in the application, specifically deficiencies related to modeling, were not properly addressed. Commenters are also concerned that the Application did not include referenced vendor information to support the emissions calculations representations, specifically questioning the represented 0.005 lb/MMBtu particulate matter limit from the turbines. Commenters questioned the calculations and impact of hazardous air pollutants represented in the application, specifically questioning why the application assumes no HAP emissions during maintenance, startup, and shutdown (MSS). Commenters also questioned the calculation methodology and emission factors utilized in the Application, specifically stating that they believe EPA emission factors to be of 'poor quality' and should not be relied upon to estimate emissions. Commenters further questioned why alternate emission calculations were not provided for the co-firing of hydrogen, stating that all emissions are based on the burning of methane gas.

(Group A, Colin Cox, and Joshua Smith)

RESPONSE 8: The TCEQ is unaware of any misrepresentations in the application. The first step of the application review process is an administrative review which verifies the following: the correct application was submitted, the application form and TCEQ Core Data Form have been signed by the Responsible Official, the company is an entity legally entitled to do business in Texas, the information is accurately recorded in the TCEQ's Central Registry, the appropriate application fee was received, the mailing addresses for the company and site are USPS validated, and there are no delinquent fees owed by the company. Additionally, the administrative reviewer completes the draft first public notice package. Once a project is declared administratively complete, the application and the first notice package (Notice of Receipt of Application and Intent to Obtain Air Permit) are made available for public review.

The air quality permit application then undergoes a technical review. During the technical review, the permit reviewer evaluates the following: all sources of air contaminants at the proposed facility have been properly identified; appropriate controls have been proposed for each emission source, including Best Available Control Technology (BACT); emission calculations have been completed correctly using approved methodology and appropriate emission factors; proposed emissions meet applicable state and federal requirements to be considered protective; compliance history for the site and the operator; and applicable public notice requirements are fulfilled.

If errors or omissions are found in the application, the permit reviewer will send the applicant a deficiency letter which provides a date by which corrections must be received. If supplemental information is not received, the Executive Director may suspend or void the application. The review does not start over, but rather continues until all information is verified. Application deficiencies were sent to the Applicant with requested timeframes, and the Applicant has addressed these deficiencies accordingly. A first deficiency letter, which included items from the initial modeling review, was sent to the Applicant on August 19, 2021. The Applicant provided a response on September 17, 2021 and addressed all items from the deficiency letter. Additional deficiency items, which did not include any modeling items, were sent to the Applicant on August 31, 2021. The Applicant provided a complete response to these items on September 28, 2021. Additional deficiency items regarding the modeling were sent from the TCEQ Air Dispersion Modeling Team (ADMT) on September 22, 2021. After this date, ADMT met with the Applicant on multiple occasions to discuss how to address these items from this deficiency. The official response from the Applicant was provided on December 3, 2021. ADMT continued to have ongoing meetings and discussions with the Applicant after the official response was provided. Final modeling was requested on December 15, 2021, which the Applicant provided on January 29, 2022.

The Executive Directors' staff conducted a technical review of the application, which included an evaluation of the emissions calculations to ensure they were completed correctly, using approved methodology and appropriate emissions factors. AP-42 emission factors are considered to be conservative, and stack tests for particulate matter will be required to demonstrate compliance with permitted rates. The vendor information for the turbines was submitted with the first deficiency letter response on September 17, 2021. Regarding HAP emissions, formaldehyde is represented as part of the total HAP emissions and included with the total VOC emissions. Since VOC includes formaldehyde, and because VOC emissions during MSS activities result in higher hourly emission rates, formaldehyde was represented in the MSS activities emissions calculations. HAPs from both MSS and routine activities are also included in the total annual emission rates. HAP emissions over an hour would be in trace amounts, so their inclusion on the Maximum Allowable Emissions Rate Table (MAERT) hourly limitations was not merited. Regarding co-firing of hydrogen, the emissions calculations are based upon the worst-case scenario of combusting solely natural gas, which consists of mostly methane. Representing this results in a more conservative emission rate estimate because emissions from firing natural gas are higher than emissions from co-firing hydrogen gas.

The Applicant represented the appropriate methodologies to control and minimize emissions and utilized corresponding control efficiencies when calculating the emission rates. As provided in 30 TAC § 116.116(a), the Applicant is bound by these representations, including the represented performance characteristics of the control equipment. Once all emission rates have been verified, the draft permit is created. The draft permit includes a MAERT which limits the quantity of emissions an applicant can emit into the atmosphere. The emissions tabulated in the MAERT are also used as the input for the air dispersion modeling evaluation to determine if any adverse effects to public health, welfare, or physical property are expected to result from a facility's proposed emissions. The draft permit clearly indicates which equipment may be a source of those pollutants and includes the operational representations which are documented in the draft Special Conditions and are the basis upon which the emissions were determined.

With respect to the RMP, per 40 CFR 68.150(b)(3), the owner/operator shall submit the RMP no later than the date on which a regulated substance is first present above a threshold quantity in a process. As such, the permit includes a Special Condition which requires the RMP to be submitted to the TCEQ prior to the date that the site first exceeds a threshold quantity of aqueous ammonia (NH₃).

TCEQ staff verified the contact and phone number the Applicant provided as part of the application was correct.

The Air Permits Division and other applicable TCEQ staff have conducted a thorough review of this permit application to ensure it meets the requirements of all applicable state and federal standards. An applicant is bound by its representations in the application and those representations become an enforceable part of the permit,

including production rates, authorized emission rates, and equipment. If the Applicant deviates from the representations made in the application, on which the permit was developed, the Applicant may be subject to enforcement action.

COMMENT 9: Best Available Control Technology (BACT)

Commenters questioned the control technology proposed in the application, stating that more stringent pollution controls should be required. Mary Bernard asked the TCEQ recommend measures that will reduce or eliminate air pollution.

(Group A, Group B, and Mary Bernard)

RESPONSE 9: TCAA and TCEQ rules require an evaluation of air quality permit applications to determine whether adverse effects to public health, general welfare, or physical property are expected to result from a facility's proposed emissions. As part of the evaluation of applications for new or amended permits, the permit reviewer audits all sources of air contaminants at the proposed facility and assures that the facility will be using the BACT applicable for the sources and types of contaminants emitted. The BACT is based upon control measures that are designed to minimize the level of emissions from specific sources at a facility. Applying BACT results in requiring technology that best controls air emissions with consideration given to the technical practicability and economic reasonableness of reducing or eliminating emissions.⁵ BACT may be numerical limitations, the use of an add-on control technology, design considerations, the implementation of work practices, or operational limitations.

The TCEQ BACT evaluation is conducted using a "tiered" analysis approach. The evaluation begins at the first tier and continues sequentially through subsequent tiers, if necessary, as determined by the evaluation process described in this document. In each tier, BACT is evaluated on a case-by-case basis for technical practicability and economic reasonableness. The three tiers are described in the following paragraphs:

⁵ See TCAA § 382.0518; 30 TAC § 116.111.

Tier I: Emission reduction performance levels accepted as BACT in recent permit reviews for the same process and/or industry continue to be acceptable.

Tier II: Tier II BACT evaluation involves consideration of controls that have been accepted as BACT in recent permits for similar air emission streams in a different process or industry. For example, an applicant may propose to control VOC emissions in one industry using technology already in use in another industry. A Tier II evaluation includes issues relating to stream comparison and possible differences in overall performance of a particular emission reduction option. In addition, the Tier II evaluation considers technical differences between the processes or industries in question. To demonstrate technical practicability, detailed technical analysis may be required to assess the cross-applicability of emission reduction options. In Tier II, economic reasonableness is established by historical and current practice.

Tier III: A Tier III BACT evaluation is a detailed technical and quantitative economic analysis of all emission reduction options available for the process under review and is similar to EPA’s top-down approach. Technical practicability is established through demonstrated success of an emission reduction option based on previous use, and/or engineering evaluation of a new technology. Economic reasonableness is determined solely by the cost-effectiveness of controlling emissions (dollars per ton of pollutant reduced) and does not consider the effect of emission reduction costs on corporate economics.

The Applicant has represented in the permit application that Tier I BACT will be used for the proposed new and modified sources. The contaminants authorized by this permitting action are aqueous ammonia (NH₃), carbon monoxide (CO), hazardous air pollutants (HAPs), hydrogen (H), nitrogen oxides (NO_x), volatile organic compounds (VOC), particulate matter including particulate matter with diameters of 10 microns or less (PM₁₀) and 2.5 microns or less (PM_{2.5}), sulfur dioxide (SO₂), and sulfuric acid mist. The primary control measures applied to this facility are identified in the table below as follows:

Source Name	BACT Description
OCPS Combined Cycle Unit 1A Turbine, Unit 1B Turbine, and the Unit 1 annual emissions cap	<p>Hourly emissions are based on a maximum heat input of the turbine and a site variability factor, which occurs under maximum load and an ambient temperature of 100°F. Annual emissions are based on average heat input of the turbine, taken at full load, and a design ambient temperature of 69.4 °F. The gross heat rate at baseload is 6,059 Btu/kW-hr or 6,762 Btu/kW-hr (with a 9% degradation).</p> <p>NO_x: 2.0 parts per million by volume, dry (ppmvd) at 15% O₂ on a rolling 24-hr average for firing either 100% natural gas or co-firing up to 30 vol% hydrogen with natural gas. The turbines and HRSGs are equipped with Dry Low NO_x burners (DLNB) and SCR as post-combustion control.</p> <p>CO: 2.0 ppmvd at 15% O₂ on a rolling 24-hr average for firing either 100% natural gas or co-firing up to 30 vol% hydrogen with natural gas.</p>

Source Name	BACT Description
	<p>The turbines and HRSGs are equipped with an oxidation catalyst is used for post-combustion control.</p> <p>VOC: 2.0 ppmvd at 15% O₂ on a 3-hr average for firing either 100% natural gas or co-firing up to 30 vol% hydrogen with natural gas, achieved through use of an oxidation catalyst as post-combustion control and use of good combustion practices.</p> <p>Sulfur compounds: The sulfur content of natural gas is 0.44 grains sulfur per 100 dry standard cubic feet (dscf) on an annual basis, while the blended fuel will have a sulfur content of 0.33 grains per 100 dscf, provided by the turbine manufacturer.</p> <p>PM/PM₁₀/PM_{2.5}: 0.005 lb/million British thermal units (MMBtu) based on vendor emission estimates for the turbines and an assumed conversion rate of ammonia (NH₃) into ammonium sulfate in the SCR based on vendor data, representing the sum of filterable and condensable particulate. All particulate matter is equal to PM₁₀ and PM_{2.5}. Good combustion practices will be employed. No active PM control device is technically feasible or has been demonstrated in practice.</p> <p>NH₃: 7.0 ppmvd at 15% O₂ for firing either 100% natural gas or co-firing up to 30 vol% hydrogen with natural gas. Emissions of NH₃ originate from NH₃ slip from the SCR system. Good management practices and operation of the SCR are used.</p> <p>GHG as CO₂e (greenhouse gas as CO₂ equivalent): Exclusive use of natural gas and a blend of 30 vol% hydrogen with natural gas as fuels, using a high efficiency combined cycle power generation method, and minimizing fugitive methane and SF₆ releases from associated equipment.</p> <p>The clean thermal efficiency of the combustion turbines is 747.7 lb CO₂/megawatt hour (MWh) (gross) at full load with the HRSG in operation, including periods of startup and shutdown. A 2% adjustment is applied for performance variability, a 3% adjustment is applied for unrecoverable degradation, and a 4% adjustment is applied for recoverable performance degradation. This results in a total of 9% adjustment, yielding a BACT value of 814.7 lb CO₂/MWh (gross) thermal efficiency.</p> <p>MSS: Although the dry low NO_x burners (DLNB), selective catalytic reduction (SCR) system, and oxidation catalyst will still be used to reduce some emissions, NO_x, CO, and VOC emissions will be at higher levels than during normal operations. Ammonia injection is initiated during startup after the SCR attains the minimum operating temperature. The duration of startups and shutdowns will be minimized, pollution control equipment will be engaged as soon as possible, and the emissions will be limited to meet the MAERT. Units will start on 100% natural gas only.</p>

Source Name	BACT Description
OCPS Cooling Tower	<p>The cooling tower will be non-contact design, and the water inlet flow rate is based on the maximum expected flow rate of 13,734,000 gallons per hour.</p> <p>It is not expected to have any hydrocarbon-carrying streams that could contact the cooling water being sent to the towers. Therefore, no quantifiable VOC emissions are expected from this source.</p> <p>The cooling tower cells will employ drift eliminators achieving a drift rate of less than or equal to 0.0005%.</p>
OCPS Fuel Gas Natural Gas Water Bath Heater	<p>The 16.80 MMBtu/hr natural gas-fired fuel gas water bath heater is used to heat water to warm the natural gas fuel prior to combustion in the combustion turbines. It is authorized for continuous use. Use of pipeline quality natural gas and good combustion practices are employed.</p> <p>CO: 50 ppmvd at 3% O₂ (0.0375 lb CO/MMBtu).</p> <p>NO_x: 0.04 lb/MMBtu, achieved by use of low NO_x burners. This concentration is accepted as BACT for small natural gas-fired heaters below 40 MMBtu/hr.</p> <p>VOC: 5.5 lb/MMscf VOC (0.005 lb VOC/MMBtu).</p> <p>SO₂: 0.44 grains sulfur/100 dscf of fuel. SO₂ is based on 100% conversion of sulfur to SO₂.</p> <p>PM/PM₁₀/PM_{2.5}: 7.6 lb/MMscf (0.007 lb/MMBtu). The maximum opacity is 5%.</p> <p>CO₂e: A limit of 8,616.6 tons per year (tpy) CO₂e is proposed for a small heater (less than 100 MMBtu/hr).</p>
OCPS Fuel Gas Hydrogen Gas Water Bath Heater	<p>The 14.00 MMBtu/hr natural gas-fired fuel gas water bath heater is used to heat water to warm the hydrogen gas fuel prior to combustion in the combustion turbines. It is authorized for continuous use. Use of pipeline quality natural gas and good combustion practices are employed.</p> <p>CO: 50 ppmvd at 3% O₂ (0.0375 lb CO/MMBtu).</p> <p>NO_x: 0.04 lb/MMBtu, achieved by use of low NO_x burners. This concentration is accepted as BACT for small natural gas-fired heaters below 40 MMBtu/hr.</p> <p>VOC: 5.5 lb/MMscf VOC (0.005 lb VOC/MMBtu).</p> <p>SO₂: 0.44 grains sulfur/100 dscf of fuel. SO₂ is based on 100% conversion of sulfur to SO₂.</p> <p>PM/PM₁₀/PM_{2.5}: 7.6 lb/MMscf (0.007 lb/MMBtu). The maximum opacity is 5%.</p> <p>CO₂e: A limit of 7,180.5 tpy CO₂e is proposed for a small heater (less than 100 MMBtu/hr).</p>
Emergency generator	<p>The 2,922 horsepower (hp) diesel-fired emergency standby generator engine will fire ultra-low sulfur diesel fuel with less than 15 ppmw</p>

Source Name	BACT Description
	sulfur. The engine will operate no more than 100 hours per year for non-emergency operating time (routine testing, maintenance, and inspection purposes). Use of good combustion, maintenance practices, and low GHG fuels will be used. The engine meets an emission limit of 1.7 lb CO ₂ e/kW-hr.
Firewater pump	The 327 hp diesel-fired emergency firewater pump engine will fire ultra-low sulfur diesel fuel with less than 15 ppmw sulfur. The engine will operate no more than 100 hours per year for non-emergency operating time (routine testing, maintenance, and inspection purposes). Use of good combustion, maintenance practices, and low GHG fuels will be used. The engine meets an emission limit of 1.7 lb CO ₂ e/kW-hr.
Fire protection generators	The two diesel-fired emergency fire protection generator engines are each rated at 755 hp and will fire ultra-low sulfur diesel fuel with less than 15 ppmw sulfur. Each engine will operate no more than 100 hours per year for non-emergency operating time (routine testing, maintenance, and inspection purposes). Use of good combustion, maintenance practices, and low GHG fuels will be used. The engine meets an emission limit of 1.7 lb CO ₂ e/kW-hr.
Natural gas fugitives	For natural gas piping, natural gas leakage is estimated using synthetic organic chemical manufacturing industry (SOCMI) factors for sources without ethylene. The uncontrolled VOC emissions from fugitive sources are less than 10 tpy. However, elapsed time indicator (ETI) implements a 28 Audio/Visual/Olfactory (AVO) monitoring program to reduce fugitive emissions from the natural gas piping system. AVO checks are made daily.
Ammonia fugitives	For the SCR system, the ammonia leakage is estimated using SOCMI factors for sources without ethylene. ETI implements a 28 AVO fugitive inspection program to reduce fugitive emissions from the SCR system. AVO checks are made daily.
Diesel fugitives	For diesel piping, the diesel leakage was estimated using SOCMI factors for sources without ethylene. Diesel is 100% VOCs and the HAP composition is based on a conservative assumption of 2% weight. The uncontrolled site-wide VOC emissions from fugitive sources are less than 10 tpy. No leak detection and repair (LDAR) monitoring is required.
OCPS Lube Oil Vents	The closed-loop lube oil recirculation system will generate oil mist emissions from oil vaporization and condensation, which will be controlled by a mist eliminator on each system and exhausted through dedicated lube oil vents.

Source Name	BACT Description
OCPS Maintenance Activities	<p>Maintenance activities, aside from turbine startup and shutdown, include:</p> <ol style="list-style-type: none"> 1. On-line turbine water washing 2. Turbine inlet air filter changeouts 3. Catalyst Handling 4. Gaseous Fuel Venting from the fuel line and small equipment 5. CEMS analyzer calibration for NO_x and CO 6. Small equipment maintenance, replacement, and repair in VOC and NH₃ service. <p>ETI will maintain good air pollution control practices and safe operating practices. ETI will verify all maintenance activities on an annual basis and evaluate emissions each calendar month. A list of the authorized maintenance activities is included as Attachments A and B of the permit.</p>
Storage Tanks	<p>These fixed roof storage tanks store diesel, bleach, and sulfuric acid. Only tank OCPSTK18 is a vertical fixed roof tank. All other tanks are horizontal fixed roof tanks. These tanks are equipped with bottom fill or submerged fill, have exterior surfaces painted white, unpainted stainless steel, or unpainted aluminum. Only tank OCPSTK18 is a polyethylene tank for corrosivity purposes. All tanks store chemicals with below 0.5 pounds per square inch, absolute (psia) true vapor pressure or the tank is less than 25,000 gallons in size. Therefore, vapors from storage of chemicals are routed to the atmosphere.</p>
Process vessels	<p>These process vessels were originally considered fixed roof storage tanks by the applicant. It was determined that chemicals stored in tanks smaller than 500 gallons in capacity are considered viscous liquids or the storage tanks were categorized as process vessels. These vessels store and process organic and inorganic liquids with low vapor pressures and generally low annual throughputs (hydraulic fluid, seal oil, bleach, sulfuric acid, natural gas condensate, and lube oil).</p>
OCPS Circuit Breaker Fugitives	<p>Fugitive sulfur hexafluoride (SF₆) emissions occur from circuit breaker leakage. SF₆ is used in high voltage electrical equipment as an insulator and/or arc quenching medium. Up to 10 circuit breakers will be used. A plant-wide emission limit of 76 tpy of CO₂e on a rolling 12-month average is proposed. State-of-the-art circuit breakers that are gas-tight and require minimal SF₆ are used. An AVO monitoring program is used to detect circuit breaker leaks. Use of good operations and preventative maintenance practices are employed.</p>

The permit reviewer evaluated the proposed BACT and confirmed it to be acceptable.

COMMENT 10: Draft Permit

Commenters expressed concern regarding the draft permit. Specifically, commenters expressed concern regarding the exceptions to pollution limits identified in Special Condition 5, stating that as emission limits from the turbines were placed to meet BACT requirements, the exceptions listed would undermine those limits. Specific concerns regarding the exceptions listed in the condition are as follows:

- Commenters expressed concern about the first exception, which states that listed limits shall not apply except when each turbine is in 'Environmental Compliance Mode'.
- Commenters expressed concern about the second exception for planned startup events, stating that it is 'exceedingly broad', broader than 40 CFR Part 63, Subpart YYYY (NESHAP: Stationary Combustion Turbines) limits.
- Commenters expressed concern about the third exception for planned shutdowns, stating that 40 CFR Part 63, Subpart YYYY (NESHAP: Stationary Combustion Turbines) does not include any exceptions for shutdowns.
- Commenters expressed concern about the fourth exception for planned maintenance activities, stating that the application does not detail how often the maintenance activities will happen or how long they will last.
- Commenters expressed concern about the fifth exception for reduced load operations, stating that it appears to make the first exception redundant. Commenters are also concerned that the application and permit do not specify how often or for how long the turbines are intended to operate at reduced load, and that this should be included in the permit.
- Finally, commenters expressed concern about the sixth exception for transitional load operations, stating that the application does not specify how often the Applicant expects this exception to apply.

Commenters stated that the draft permit is unclear regarding the timing of the claimed emission reductions from the retirement of Boiler Unit 1, specifically that the draft permit does not define what 'the commencement of operation of these gas turbine facilities' is and requested clarification.

Commenters also expressed concern that the draft permit does not incorporate emission limits and monitoring conditions required by 40 CFR Part 63, Subpart YYYY (NESHAP: Stationary Combustion Turbines), finalized on March 9, 2022, stating that EPA finalized this rule to limit formaldehyde emissions from turbines to a maximum of 91 parts per million, which should be incorporated into the permit. Commenters also stated that this rule requires an initial compliance demonstration and ongoing annual compliance demonstrations for the life of the turbines, which should also be incorporated into the permit.

Commenters acknowledge that the Applicant represented only a portion of this subpart as applicable to the plant, stating that while this may have been true during the initial application submittal, EPA has since taken final action to require compliance with all of Subpart YYYY. Commenters stated that the permit should be updated to reflect these requirements, specifically meeting a limit of 91 ppm of formaldehyde at all times except during periods of startup and shutdown.

(Colin Cox and Joshua Smith)

RESPONSE 10: Exceptions to pollutant limits are required in the permit due to the reality of how turbines operate and how emissions vary with operation. Startup and shutdown periods such as the Environmental Compliance Mode are inherent to turbine operation, as peak efficiencies are achieved when at high operational loads. Reduced load operations, such as those specified in Special Condition 5(E) are not associated with startup and shutdown but are instead intended to capture lower operational load scenarios outside of peak demand. The MAERT specifies hourly emission rate limitations for maintenance startup and shutdown periods, but the annual emission rate for the two turbines is intended to function as a form of a cap on emissions which includes startup and shutdown, lower operational load scenarios, and normal/high demand operation. The Applicant will be required to maintain records demonstrating compliance with the hourly and annual MAERT limitations. This gives the operator flexibility for unforeseen scenarios and the demands of the electrical grid within the limitations of their permitted emission rates. Therefore, specific limitations on periods such as startup and shutdown and reduced load were not necessitated. An applicant is bound by its representations in the application and those representations become an enforceable part of the permit, including production rates, authorized emission rates, and equipment, as well as the frequency and duration of MSS activities that were utilized in the emissions calculations and the impact analysis. If the Applicant deviates from the representations made in the application, on which the permit was developed, the Applicant may be subject to enforcement action.

The Special Conditions of the permit state that the reduction of emissions (from Boiler Unit 1) shall occur no later than the commencement of operation of the gas turbine facilities. The term 'the commencement of operation' does not have to be further defined by the permit (i.e., with an exact commencement date) to be enforceable, as the permit holder is required by the permit to ensure the reductions occur before the gas turbine facilities start operation, whatever that date may be.

40 CFR 63 Subpart YYYY was promulgated after the draft permit had been finalized, and while specifics from that rule will pertain to these facilities, the case-by-case permit does not need to directly list and reference all requirements from the rule for it to still be applicable. A reference to 40 CFR 63 Subpart YYYY has been added to the Special Conditions and compliance with any requirements which are more stringent than or supplemental to the permit will be required regardless of whether the Special Conditions directly re-list all of the requirements. The 91 ppm limit of formaldehyde will be indirectly continuously monitored due to the presence of a CO Continuous

Emission Monitoring System. Given that CO emissions are directly related to formaldehyde formation, the monitoring of CO limits is expected to indirectly demonstrate compliance with federal formaldehyde limits.

COMMENT 11: Demonstrate Compliance with Permit

Commenters expressed concern that the draft permit does not require adequate monitoring to ensure compliance with the emission limits, specifically monitoring for fine particulate matter, hazardous air pollutants, and sulfur dioxide. Commenters further stated that while monitoring requirements for these pollutants are included in the permit, they believe it is not sufficient as the methodology and emissions factors utilized in the calculations are not adequate; therefore, commenters requested that stack testing for particulate matter, hazardous air pollutants, and sulfur dioxide be required for the turbines instead.

(Colin Cox and Joshua Smith)

RESPONSE 11: Special conditions have been included as part of the proposed permit to ensure the Applicant can demonstrate compliance with the emission limitations set forth in the permit. The permit holder is also required to maintain records to demonstrate compliance, including that of any stack sampling performed. Records must be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction. The Regional Office may perform investigations of the plant as required. The investigation may include an inspection of the site including all equipment, control devices, monitors, and a review of all calculations and required recordkeeping.

It is unclear why stack testing was requested by the commenters for PM and SO₂, as testing of these pollutants is already required in Special Condition 21(B) of the draft permit. Additionally, monitoring is a separate issue from the performance demonstrations of stack testing. Individual HAPs can be present in trace amounts in natural gas. Testing of these in the exhaust of the turbine is not technically feasible given that they can be minute fractions of pollutants already being tested. Compliance with HAP emission limitations is demonstrated through compliance with the emission limitations specified on the MAERT.

As stated in Response 9, the Applicant represented the appropriate methodologies to control and minimize emissions and utilized corresponding control efficiencies when calculating the emission rates. As provided in 30 TAC § 116.116(a), the Applicant is bound by these representations, including the represented performance characteristics of the control equipment.

COMMENT 12: Expedited Permitting

Commenters asked that TCEQ deny the request for expedited permit processing, stating the Applicant has not demonstrated why expediting the application is appropriate. Commenters further stated that creating jobs and benefiting the local

economy is not enough justification to expedite the application. Commenters also stated that the TCEQ should follow the standard practice for processing applications, expressing concern that the expedite review would not have the same value of administrative transparency, consider public input or technical comments, or provide time to make permit revisions.

(Group A)

RESPONSE 12: Senate Bill 1756, 83rd Legislature, 2013, amended the TCAA to provide TCEQ with the authority to accept a surcharge from applicants to cover the expenses incurred by expediting the processing of an application. This surcharge may be used to fund the use of additional resources in the form of overtime to process the application in an expedited manner. Any applicant may request to have their application expedited. TCEQ will expedite the review of the application if the applicant can demonstrate eligibility under 30 TAC § 101.600 and remits the appropriate surcharge. Expedited applications undergo the same level of scrutiny and review as non-expedited applications and follow all air permitting process requirements. Further, the public notice requirements and the duration of the public notice comment period is the same for both expedited and non-expedited projects. *See* Response 6 for concerns regarding public notice.

The economic benefit analysis is not part of the administrative or technical review and does not impact the issuance of a permit. Guidance on the implementation of the Expedited Permitting Program is available on the TCEQ website:
https://www.tceq.texas.gov/permitting/air/nav/air_docs_newsourc.html.

COMMENT 13: Environmental Justice

Commenters raised concerns regarding the environmental justice implications of this project, stating that minorities and low-income households are at higher risk for negative impacts of the proposed project.

(Group A)

RESPONSE 13: Air permits evaluated by the TCEQ are reviewed without reference to the socioeconomic or racial status of the surrounding community. The TCEQ is committed to protecting the health of the people of Texas and the environment regardless of location. A health effects review was conducted for the proposed facilities during the permit review and the permit was found to be protective of human health and the environment.

The TCEQ encourages participation in the permitting process. The Office of the Chief Clerk works to help the public and neighborhood groups participate in the regulatory process to ensure that agency programs that may affect human health or the environment operate without discrimination and to make sure that concerns are considered thoroughly and are handled in a way that is fair to all. The Office of the Chief Clerk can be contacted at 512-239-3300 for further information. More information may be found on the TCEQ website: [Title VI Compliance at TCEQ - Texas Commission on Environmental Quality - www.tceq.texas.gov](http://www.tceq.texas.gov).

COMMENT 14: Jurisdictional Issues

Location / Zoning: Commenters expressed concern regarding the location of the facility as it relates to current zoning ordinances and the proximity to residential and public areas, including schools.

(Group A and Group B)

Local Economy / Infrastructure: Commenters stated the Applicant has not demonstrated the proposed project will benefit the local economy and may have economic consequences for the area. Diane Castro and Emma Pabst expressed concern for the local fishing industry. Commenters also expressed concern that the Applicant has represented to their shareholders that they intend to 'leverage' existing infrastructure, including hydrogen pipelines, that may be used to fuel the facility.

(Group A, Ariana Akbari, Diane Castro, Emma Pabst, and Terry D. Stelly)

RESPONSE 14:

Location / Zoning: The TCEQ does not have jurisdiction to consider plant location choices made by an applicant when determining whether to approve or deny a permit application, unless a statute or rule imposes specific distance limitations that are enforceable by the TCEQ. Zoning and land use are beyond the authority of the TCEQ for consideration when reviewing air quality permit applications and such issues should be directed to local officials. The issuance of an air quality authorization does not override any local zoning requirements that may be in effect and does not authorize an applicant to operate outside of local zoning requirements.

Local Economy / Infrastructure: Similarly, issues related to the local economy and public infrastructure are outside the scope of review of an air quality permit. The Executive Director has reviewed the permit application in accordance with the applicable law, policy, and procedures, in accordance with the agency's mission to protect our state's human and natural resources consistent with sustainable economic development. If an applicant meets the requirements for an air quality permit, the TCEQ must grant the permit.

COMMENT 15: TCEQs Responsibility to the Community

Commenters asked that the TCEQ consider the residents' wishes and deny the permit application. Lauren Spear asked the TCEQ to stop pandering to oil and gas companies.

(Group A, Group B, and Lauren Spear)

RESPONSE 15: The Executive Director's staff has reviewed the permit application in accordance with the applicable state and federal law, policy and procedures, and the agency's mission to protect the state's human and natural resources consistent with sustainable economic development. The TCEQ cannot deny authorization of a facility if a permit application contains a demonstration that all applicable statutes, rules, and regulations will be met.

CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker, Executive Director

Erin E. Chancellor, Director
Office of Legal Services

Charmaine Backens, Deputy Director
Environmental Law Division



Contessa N. Gay, Staff Attorney
Environmental Law Division
State Bar Number 24107318
PO Box 13087, MC 173
Austin, Texas 78711-3087

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

**Entergy Texas, Inc.,
Permit Nos. 166032, GHGPSDTX210, and PSDTX1598**

Appendix A

The Office of Chief Clerk received timely comments from the following persons:

Colin Cox (on behalf of the Environmental Integrity Project [EIP]), Joshua Smith (on behalf of the Sierra Club), Terry D. Stelly (on behalf of the South Texas Clean Air & Water, Inc.), Ariana Akbari, Mary Bernard, Emma Bernard, and Emma Pabst.

COMMENT GROUP A: Sierra Club, Environmental Integrity Project, Environment Texas, Air Alliance Houston, Clean Energy Fund of Texas, Inc., Port Arthur Community Action Network, and Texas Campaign for the Environment, Laurie Abshire, Mary Adam, Evelyn Adams, Darlene Aksoy, Marian Alexander, Kambra Allen, Benjamin Alpers, Lynda Alvarez, Jim Anderson, Vivian Andrews-Burke, Debra Atlas, George Buzz Avery, Cameron Babberney, Margarita Bach, Paul Bae, Glyn Bailey, James Baker, Margaret Baker, Jack Balsley, Jennie Barajas, Robert Barnes, Gary Barton, Catherine Bass, Sue Batchelor, Nikhil Batra, Karen Baum, John Beard, Jan Beauchamp, Rick Becker, Mavis Belisle, David Bell, Linda Berger, Vernon Berger, Karen Berning, Gloria Bertrand, Robert Beverly, Sandra Bieri, Frank Blake, Mark Blandford, Joe Van Blargan, Tracey Bonner, Gordon Bourland, Joyce Bowman, John Boyd, Clara Boyer, Al Braden, Tom Bray, Theodore Brazeau, Kelly Breazeale, Patricia Breazeale, John Bridgest, Peggy Brod, Patricia Brooks, Donna Brown, Duncan Brown, Erica Brown, Steve Brown, Zack Brown, Donna Brslik-Lumicao, Chris Brunner, James Bryson, Ellen Buchanan, Michael Buescher, Ashley Bull, David Burnett, Barbara Burton, Madalynn Carey, Evangeline Caridas, Diane Carmona, Maricela Carmona, Cheryl Carney, Linda Carr, Eric Casey, Jan Casner, Diane Castro, Mary Cato, Anne Caton, Nada Chandler, Steve Chelewski, Michael Chitty, Jose Choquehuanca, Maryrose Cimino, Callie Clark, Joy Clark, Richard Clark, Bonnie Clements, Sharon Cloninger, Jeannie Coggins, Citizen Concerned, Sabrina Cook, Dave Cortez, Kevin Courtney, Colin Cox, Donald Cramer, Analisa Crandall, Stephen Crane, Thomas Crofts, Catherine Croom, Joan Cunningham, Phil Curry, Mark Daniels, Deann Darling, Kathryn Davidson, Jonathan Davis, Sallie Delahoussaye, Janet Delaney, James Deleon, Crystal Delgado, Maryanne Delgado, Susan Derammelaere, Joyce Dixon, Brian Dolenz, Jeff Dravis, Deyanira Duarte, Michael Dubrick, Tim Duda, Diane Duesterhoeft, Ron Duke, Jo Ann Duman, Sylvia Duncan, Michael Dunson, Margaret Duran, Michael Earney, Sabrina Eckles, Chantal Eldridge, Caryl Elver, Cindy Engel, Steve Englander, Sharla Ensle, Kelly Epstein, James Evans, Pam Evans, L Fielder, Tanya Finney, Gregg Fletcher, Carol Fly, Patricia Flynn-Williams, Vincent Fonseca, William Forbes, Delaina Foster, Diana Franta, Sarah Frazier, Melinda Fritsch, Nancy Fullerton, Charlene Gagon, Jim Galindo, Sally Galindo, Joseph Garfunkel, Ben Garrett, Jane Garrett, Bonny Gatchel, Taryn Geer, Amanda Gillespie, Robert Gilliland, Kathy Glass, Vincent Goetz, Rose Gomez, Paul Gonin, Andrea Gonzalez, Cristina Gonzalez, Emma Goode-Deblanc, Mark Goodman, Deborah Goodykoontz, Martha Gorak, Patsy Goss, Gary Graham, Evelyn Granahan, Alexander Grant, Michael Gray, Sandra Green, Debra Greenberg, Christina Gregory, Carol Grimm, Stephen Grossman, Christine Guldi, Virginia Gutierrez, Judy Haas, Linda Hahus, Stephanie Haley, Brad Hall, John Haller, Hank Hammett, Mary

Executive Director's Response to Public Comment

Entergy Texas, Inc., Permit No. 166032, GHGPSDTX210, and PSDTX1598

Page 29 of 31

Hancock, Nancy Hardwick, Kathy Harrison, Emily Hausler, Susan Hernandez, Steve Hess, Robert Hewes, Charles C Hill, Dash Hines, Beverly Hoff, Cindy Hoffman, Kimberly Holborn, Jennifer Holburn, Linda Hollar, James Hollis, Grace Holman, Alan Holt, Bill Holt, Sue Holtz, Darren Huff, Randee Hughes, Kylara Hunter, Rebecca Iles, Raymond Ings, Ellen Isaly, Suzanne Ivy, Maury Jacob, Jeffrey Douglas Jacoby, Sally Jacques, Jane Jatinen, John Jenicek, Rachael Jett, Kathryn Johnson, Lisa Johnson, Denise Jones, Dennis Jones, Jeanne Jordan, John Jumonville, Diana Kalish, Andrew Katsetos, Greg Kay, Mary Kearney, Steven G Kellman, Joyce Kelly, Edward Kern, L Kifer, Winston Kile, Anne Kilgore, Bill King, Robert King, Jack Kirfman, Agnes M Klar, James Klein, Susan Knabeschuh, Brant Kotch, Jennifer Koval, Jacky Kusterer, Jerell Lambert, Julia Landress, Mary Laskowski, Pat Lastrapes, Nancy Latner, April Lauper, Barbara Lavender, Sandy Spann Leissler, Philip Lemessurier, Nyla Lenart, Brian Leonard, Kristin Lewis, Susan Lippman, Harmon Lisnow, Ann Loera, T Logan, T Longoria, Alfonso Lopez, Gilberto Lopez, Celestin Lorenzo, Melssa Lugo, Andrew Lyall, Rajesh Lyer, Kaylynn Lyon, Leah Mackay, Jade Madrid, Bill Maina, Afton Martin, Irene Martinez, Kate Mathis, Laura Maverick, David Mcaninch, Debbie McBride, Scott Mcclimans, Allen Mcreynolds, Kathryn Melton, Vince Mendieta, Luke Metzger, Tim Milam, Pamela Miller, Sandra La Mont, Diane Moore, Linda Moore, Thomas Moore, Claudia Morgan, Frances Morgan, Mary Morris, Jerry Morrissey, Jona Morrison, Bria Morse, Manning Mpinduzi-Mott, Lolita Muhm, Linda Mundwiler, Adele Murphy, Susan Myers, Jerry Mylius, Zach Myones, Sahand Naghavi, Craig Nazor, Rona Neuneker, Stuart Newberg, Susan Nichols, Alice Nicholson, Chris Nicolosi, Suzanne Obrien, Clive O'Donoghue, James O'flaherty, Leslie O'loughlin, Zeoma Olszewski, Blake O'quinn, Joyce Overton, Sarah Pacheco, Sarah Page, Jan Parham, Shaureece Park, A Patterson, Kayla Pelton, Deanna M Pena, Carol Pennington, Pam Pepperell, Selene Perez, Beenda Perkins, Julia Perry, Pat Perry, Martin Pesaresi, Barbara Pettit, Cecil Philip, Katherine Pickett, Jon Pitt, Rebecca Pollinzi, Marianne Poythress, Richard Pressman, Nicole Punday, Nicole Ray, Ryan Reed, Ruth Reid, Herman Rhein, Rhona Richardson, Christian Richer, Claudia Richner, Jason Richter, Terry Richter, Robert Rinker, Douglas Rives, Jill Robison, Raul Rodriguez, Ricardo Rojas, Kevin Rolfes, Steven Rosenberg, Bruce Ross, Terry Sailer, Joe Samples, Barbara Sargent, Don Sawyer, Victoria Scharen, Elizabeth Schaub, Eric Scheihagen, Marie-Anne Schiffmann, Brian Schill, Sandy Schmidt, Eugenia Schuler, Kurt Schultz, Carrie Schweitzer, James Schweitzer, Bonni Scudder, Greg Sells, Patrick De La Garza Und Senkel, John Servello, Tria Shaffer, Victoria Shih, Cathy Simmons, Sue Simmons, Cheryl Smith, Jan Smith, Joshua Smith, Karen Smith, Kate Smith, Leslie Smith, Sherolyn Smith, Steven Smith, Carolynn Snyder, Gerald Soliday, Katharine Sommerfield, Lauren Spear, Michael Spencer, Kathy Spera, Dana Spottswood, Frederick Stadelbauer, George Staff, Robert Stark, Karen Sterling, Garland Stevenson, Sandra Stevenson, Linda Steward, Dorothea Stoep, David Stokes, Lisa Stone, Sarah Sudheer, Fred Suhr, Jim Summers, Scott Swanson, Dodie Sweeney, Lowell Tacker, James Talbot, Marquita Tanner, Margaret Tatum, Bryan Taylor, Ray C Telfair, Tanya Teneyuque, Emmalyn Terracciano, Dorothea Theus, Holly Thornell, L A Toner, Yolanda Torres, Natasha Tuckett, Pamela Vangiessen, Sandra Varvel, Marie Sophia Vassilakidis, Jan E Vaughan, Joanna Vaughn, Larry Vaughn, Maria Vela, Carol Vincent, Brian Voris, Roy Waley, Marce Walsh, Kenneth Walter, Carrie Watson, Cheryl Watson, Andrew Watts, Anne Way, Pam Webster, Lisa Wegman, Barbara Welch, Ivo Van Der Werff, Carol Whalen, Becky

Wharton, Jessie Wheat, Pete Whelan, Annisa White, Edward Whitehead, Angela Wilkinson, Lynn Willhite, Corey Williams, Kim Williams, Norman Williams, Richard Willing, Kathleen Wilson, Thomas Windberg, Frank Wissler, Nara Wood, Sara Wood, Sandra Woodall, Paula Wyche, Jennifer Yacio, Robin Yates, Lisa Yelenick, Brad Youngblood, and Joanne Zipay

COMMENT GROUP B: Brian Abernathy, Joseph Aguado, Fiona Akomolede, Kassandra Allbright, Marianne Allen, Ori Amodeo, Mary Applegate, Karen Ayyad, Edwina Baethge, Toni Baker, Jennie Barajas, Rebecca Barnes, Kacie Barnett, Betty Barton, Daniel Bauermeister, Elizabeth Baur, John Beard, Jamie Bechtelheimer, JT Beebe, Joseph Bellino, Flor Benavides, Lisa Black, Judy Bluestein, Cody Bowles, Lisa Brady, Brittany Brandenberger, Debby Bridge, Diana Bridges, William Brown, Alex Brown, Sandra Brown, Zack Brown, Stephanie Buckholdt, Nina Buckland, Brandi Clark Burton, Bridget Butterworth, Lee Ann Cameron, Marisela Candelaria, Jessica Carena, Diane Carmona, Cheryl Carney, Elizabeth Caro, Noe Carpio, Matthew Carrigan, James Cassidy, Andrea Christgau, Jacqueline Cockrell, Marey Cohen, Patricia Cowan, Aela Culver, Tanya Davis, Arthur Dawes, Lois Day, Blanca Delagarza, Michele Denis, D Mark Detrixhe, Lisa DeVries, Catherine Dickason, Glenda Dickinson, Janice Dorsey, Chas Duhvel, Peggy Dyer, Jack East, Nancy Ebersole, Megan Esau, Danielle Evans, Laura Ferro, Diana Fitzgerald, Elizabeth G. Fitzpatrick, Nancy Lane Fleming, Jean Flores, Mary Fowler, Leslie Fowler, John French, Leyton Fu, Debra Gallop, Andrea Garcia, Lisa Gatti, Pat Giles, Kennedy Gilmore, Christina Glover, Aliza Gold, Stephanie Gordy, Mark Grace, Jamie Grant, Mary Gray, Merideth Green, Stephen Griffith, Sara Guzman, Suzanne Hafer, Debbie Hall, Reuben Han, Cindy Haro, Antonia Harter, Galilea Hernandez, Linda Herring, Kelly Hersh, Milton Hickman, Cynthia Hitchcock, Alexandra Holland, Geoffrey Holman, Debra Hope, Angela Hopkins, Jordan Iglesias, Annette Iott, Elisa Jiménez, Imogene Johnson, Teofilo Aviles Jr, Nicolas Kaschny, Joyce Klava, Joanna Klose, Megan Knapp, Lois Looney Kochie, Kathryn Koenig, Don Krause, Heidi Kuhnley, Caia Lacour, Jeannette LaFontaine, Ralph Lake, Jaime Lawson, Gloria Lenoir, George Lewis, Oscarv Lipchak, Adam Love, Jacob Lu, Rae Lynch, Blanca Maldonado, Michelle Martinez, Timothy Maschal, Kathleen Massey, Joe Mcbride, Catherine McCalley, Carol Mcgarvey, John McIntosh, Hilary Mcvay, Jorge Medrano, Jesus Mercado, John Mery, Kristi Michener, Joan Milford, Merri Minges-Minney, Joeline Moore, Holly Morgan, Moira Namuth, Craig Nazor, Paul Nelson, Frank Netscher, Nancy Nixon, Catherine O'Neill, Devine Oronsaye, Keith Pankhurst, Juan Peralta, Keely Perez, Emmanuel Perez, Travis Pharr, Diane Pomerance, Gary Popken, Michael Primm, Schuyler Pulford, Chris Qualizza, Julia Reece, Abigail Rivera, Jayne Chase Rn, Archana Roberts, Alexandra Robey, Lawrence Robinette, Jill Robison, Belkys Rodriguez, Aline Rosenzweig, Carolyn Ross, Carmen Rubio, Kay Ruckel, Barbara Sadnavitch, Debra Sandoval, Ellen Satinsky, Deborah Saucedo, Jessica Saucedo, Stacy Savage, Kenneth Saxon, Dan Schmoker, Patricia Schon, Kevin Schroder, Barbara Schulz, Paul De La Garza Und Senkel, Patrick De La Garza Und Senkel, Susan Seward, Kate Shaw, Darcy Shaw, Gaurav Singh, Neil Smith, Mende Snodgress, Carole Sparks, Tim Speece, Colleen Stadnick, Richard Stark, Harold Stewart, Rachael Stone, Susan Summers, Lauren Swan, Brian Swindle, Glenda Templeton, Gabrielle Theriault, Paul Thomas, Sofia Montemayor- Thomas, Carol Tobias, Mai Ton, Sid Totten, Margaret Tyree, Zachary Vanderhider, Marina Vasquez,

Marie Sophia Vassilakidis, Jan E. Vaughan, Deborah Vaughan, Armando Vazquez, Eloisa Villanueva, Audrey Vonborstel, Judith Wade, Gregory Walker, Tanner Walsh, Samantha Waxler, Evelyn Webert, Ken Wheatcroft-Pardue, Stephanie Williams, John Willis, Deirdre Wisniewski, Dian Wright, Kari Y, Guadalupe Yanez, and Robin Yates.