

Jon Niermann, *Chairman*
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Garrett T. Arthur, *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 30, 2023

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

RE: **IN THE MATTER OF THE APPLICATION BY CORPUS CHRISTI
LIQUEFACTION, LLC FOR AIR QUALITY PERMIT NOS. 105710,
GHGPSDTX123M1, AND PSDTX1306M1
TCEQ DOCKET NO. 2023-1474-AIR**

Dear Ms. Gharis:

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

Sincerely,

A handwritten signature in black ink that reads "Josiah Mercer".

Josiah T. Mercer, Attorney
Assistant Public Interest Counsel

cc: Mailing List

DOCKET NO. 2023-1474-AIR

APPLICATION BY CORPUS CHRISTI LIQUEFACTION, LLC FOR AIR QUALITY PERMITS 105710, GHGPSDTX123M1, AND PSDTX1306M1	§ § § § §	BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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**OFFICE OF PUBLIC INTEREST COUNSEL'S
RESPONSE TO REQUESTS FOR HEARING**

To the Members of the Texas Commission on Environmental Quality:

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

I. Introduction

A. Summary of Position

Before the Commission is an application by Corpus Christi Liquefaction, LLC, (Applicant or Corpus Liquefaction) for Air Quality Permits Nos. 105710, GHGPSDTX123M1, and PSDTX1306M1. OPIC notes that the TCEQ Chief Clerk's office received a total of twenty-three timely hearing requests, including twenty-one from individuals and two from groups. For the reasons stated herein, OPIC respectfully recommends the Commission grant the requests of Sierra Club, Portland Citizens United (PCU), and Dewey Magee, and refer this application for a 180-day hearing at the State Office of Administrative Hearings (SOAH) on Issue nos. 1-7 contained in § III.B.

B. Description of Application and Facility

Corpus Liquefaction applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA) § 382.0518. If approved, this would authorize the modification of an existing facility located at 622 State Hwy 35, Gregory, San Patricio County (the Facility) that emits air contaminants. This permit would authorize the Applicant to update as-built flare emissions and operations—including the correction of stream compositions and vent rates, addition of flaring of boil-off gas from LNG tanks when the upstream Sinton Compressor Facility is shut down, and removal of the Totally Enclosed Ground Flare from the permit. The application also requests authorization of a new liquefied natural gas marine loading scenario. The as-built portion of the proposed amendment is considered a retrospective correction of representations associated with the original Corpus Liquefaction Stage I/II Project, authorized by a Prevention of Significant Deterioration (PSD) permit issued on September 12, 2014, and modified by a PSD permit issued on July 20, 2018. The application also includes a voluntary update to the Greenhouse Gas PSD permit.

Contaminants authorized under this permit include carbon monoxide, hazardous air pollutants, hydrogen sulfide, nitrogen oxides, organic compounds, sulfur dioxide, and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less.

C. Procedural Background

TCEQ received the application on April 20, 2021. On April 23, 2021, the Executive Director (ED) declared the application administratively complete. The

Notice of Receipt and Intent to Obtain Air Permit was published in English on May 13, 2021, in *The News of San Patricio* and in Spanish on May 15, 2021, in the *Tejano Y Grupero News*. The Notice of Application and Preliminary Decision for an Air Quality Permit was published in English on May 26, 2022, in *The News of San Patricio* and in Spanish on June 1, 2022, in the *Tejano Y Grupero News*. A public meeting was held on June 30, 2022, in Portland, Texas. The public comment period closed on July 1, 2022. The Chief Clerk mailed the ED's Decision and Response to Comments on July 25, 2023. The deadline for filing requests for a contested case hearing and requests for reconsideration of the ED's decision was August 24, 2023.

The Commission received timely requests for a contested case hearing from twenty-one individuals and two groups.

II. Applicable Law

This application was filed on or after September 1, 2015, and is therefore subject to the procedural rules adopted pursuant to Senate Bill 709. Tex. S.B. 709, 84th Leg., R.S. (2015). Under Title 30, Texas Administrative Code (TAC) § 55.201(c), a hearing request by an affected person must be in writing, must be timely filed, may not be based on an issue raised solely in a public comment which has been withdrawn, and, for applications filed on or after September 1, 2015, must be based only on the affected person's timely comments.

Section 55.201(d) states that a hearing request must substantially comply with the following:

- (1) give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;
- (4) list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the Commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, and list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.

30 TAC § 55.201(d).

Under 30 TAC § 55.203(a), an "affected person" is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest. Relevant factors to be considered in determining whether a person is affected include:

- (1) whether the interest claimed is one protected by the law under which the application will be considered;
- (2) distance restrictions or other limitations imposed by law on the affected interest;
- (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;

- (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
- (5) likely impact of the regulated activity on use of the impacted natural resource by the person;
- (6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application that were not withdrawn; and
- (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

30 TAC § 55.203(c).

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

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

30 TAC § 55.203(d).

For applications filed on or after September 1, 2015, § 55.205(b) states that a hearing request by a group or association may not be granted unless all of the following requirements are met:

- (1) comments on the application are timely submitted by the group or association;
- (2) the request identifies, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right;

(3) the interests the group or association seeks to protect are germane to the organization's purpose; and

(4) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

Under 30 TAC § 55.211(c)(2)(A)(ii), for an application filed on or after September 1, 2015, the Commission must grant a hearing request made by an affected person if the request raises disputed issues of fact that were raised by the affected person during the comment period, that were not withdrawn by filing a withdrawal letter with the Chief Clerk prior to the filing of the ED's RTC, and, that are relevant and material to the Commission's decision on the application.

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

III. Analysis of Hearing Requests

A. Whether the Requestors are Affected Persons

Sierra Club

Sierra Club submitted timely comments and a hearing request through Colin Cox—a staff attorney with the Environmental Integrity Project. Sierra Club states that it is a non-profit corporation with an office in Texas that is dedicated to protecting Texas' natural resources by promoting responsible use, educating the public, and advocating for more sustainable energy and land use policies. As such, the interests the group or association seeks to protect are germane to the organization's purpose as required by 30 TAC § 55.205(b)(3).

The request identifies Wendy Hughes and Uneeda Laitinen as group members who would otherwise have standing to request a hearing in their own right. A map was prepared by ED staff indicating that Uneeda Laitinen lives 2.93 miles from the proposed Facility. While there are no specific distance limitations applicable to whom may be considered an affected person for purposes of this application, OPIC finds that Uneeda Laitinen lacks the proximity to establish a reasonable relationship between her claimed interests and the regulated activity. *See* 30 TAC § 55.203(c)(3).

The ED's map indicates Wendy Hughes lives 1.05 miles from the proposed Facility. Her comments relate to the Facility's potential negative effect on air quality, human health, animal health, and enjoyment of her property. Based on her location and the amount of contaminants permitted, OPIC concludes that a reasonable relationship exists between the interests she seeks to protect and the Applicant's regulated activity. *See* 30 TAC § 55.203(c)(3). Ms. Hughes therefore has standing to request a hearing in her own right as required by 30 TAC § 55.205(b)(2). Further, in compliance with 30 TAC § 55.205(b)(4), neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

In both their timely comments and hearing request, Sierra Club raises concerns related to the creation of nuisance conditions; potential adverse effects on human and animal health; the application's Best Available Control Technologies (BACT) analysis; and whether emissions would exceed allowable PSD Increments. The concerns raised by Sierra Club are related to interests

protected by the law under which the application will be considered, a relevant factor under 30 TAC § 55.203(c). Because Sierra Club has met all requirements for group standing, OPIC finds that it qualifies as an affected person.

Portland Citizens United

PCU submitted timely comments and a hearing request through Colin Cox—a staff attorney with the Environmental Integrity Project. PCU states that it is a community group formed to educate residents about industrial activity in the area, and resist that activity when it threatens the health, safety, or natural beauty of the Portland community. As such, the interests the group or association seeks to protect are germane to the organization’s purpose as required by 30 TAC § 55.205(b)(3).

The request identifies Mindi and James Rosson and Encarnacion Serna as group members who would otherwise have standing to request a hearing in their own right. According to the map prepared by ED staff, Encarnacion Serna lives 2.79 miles from the proposed Facility. While there are no specific distance limitations applicable to whom may be considered an affected person for purposes of this application, OPIC finds that Encarnacion Serna lacks the proximity to establish a reasonable relationship between his claimed interests and the regulated activity. *See* 30 TAC § 55. 203(c)(3).

The ED’s map indicates Mindi and James Rosson live 1.19 miles from the proposed Facility and their comments are concerned with potential negative effects on air quality, human health, and enjoyment of property. Based on their location and the amount of contaminants permitted, OPIC concludes that a

reasonable relationship exists between the interests they seek to protect and the Applicant's regulated activity. *See* 30 TAC § 55.203(c)(3). Minda and James Rosson therefore have standing to request a hearing in their own right as required by 30 TAC § 55.205(b)(2). Further, in compliance with 30 TAC § 55.205(b)(4), neither the claim asserted, nor the relief requested requires the participation of the individual members in the case.

In both their timely comments and hearing request, PCU raises concerns related to the creation of nuisance conditions; potential adverse effects on human and animal health; the application's BACT analysis; and whether emissions would exceed allowable PSD Increments. The concerns raised by PCU are related to interests protected by the law under which the application will be considered, a relevant factor under 30 TAC § 55.203(c)(1). Because PCU has met all requirements for group standing, OPIC finds that it qualifies as an affected person.

Dewey Magee

The Commission received timely comments and a hearing request from Dewey Magee—who resides 1.54 miles from the proposed Facility. To be granted a contested case hearing, a requestor must show that they qualify as an “affected person.” To be granted this status, the requestor must show that they have a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application; and they must distinguish that interest from those common to the general public. *See* 30 TAC § 55.203(a). In his comments and hearing request, Mr. Magee raises concerns about the Facility's

potential cumulative effect on air quality, effect on human health, and creation of nuisance conditions. His concerns are related to an interest that is protected by the law under which this application will be considered. *See* 30 TAC § 55.203(c)(1). Mr. Magee's residence is close to the Facility, and the draft permit authorizes a substantial amount and diversity of contaminants. Therefore, a reasonable relationship exists between his stated interests and the Applicant's regulated activity—a relevant factor under 30 TAC § 55.201(c)(3).

Considering the substantial levels and diversity of authorized contaminants—his location combined with his stated interests demonstrate that Mr. Magee is likely to be affected in a way not common to members of the general public, and thus possesses a personal justiciable interest in this matter. Therefore, OPIC concludes that Dewey Magee qualifies as an affected person.

Individual Requestors Located Further than 2 Miles from the Facility

The Commission received timely requests and comments from the following requestors who are all located considerable distances from the proposed Facility: Lisa Averill (17.36 miles), Alvin Baker (2.92 miles), Eduardo Canales (18.07 miles), Teresa A Carrillo (12.34 miles), Annie Dixon (244.03 miles), Jean Fuertez (15.42 miles), Don Guion (11.51 miles), Penny Gray (14.74 miles), Billy Gunn (13.12 miles), Kyle Krauskopf (15.31 miles), Maria Krauskopf (15.31 miles), Uneeda Laitinen (2.93 miles), Justin Martinez (13.01 miles), Blanca Parkinson (17.53 miles), Jenifer Pichinson (17.39 miles), Gloria Route (243.57 miles), Esquel Sanchez (16.79 miles), Abel Serrata (12.15 miles), Susan Westbrook (14.51 miles), and Wanda Wilson (18.29 miles).

These requestors are located at distances greater than two miles from the proposed Facility. OPIC notes that there are no specific distance limitations applicable to whom may be considered an affected person for purposes of this application—but at distances over two miles, OPIC finds that these requestors lack the proximity necessary to differentiate their interests from those held by the general public as required by 30 TAC § 55.203(a). Further, the intervening distances decrease any likelihood that the regulated activity will impact their health, safety, or use of property. *See* 30 TAC § 55.203(c)(4). Finally, at these distances, the requestors are unable to establish that a reasonable relationship exists between their claimed interests and the regulated activity. *See* 30 TAC § 55.203(c)(3). Therefore, OPIC cannot find that Lisa Averill, Alvin Baker, Eduardo Canales, Teresa A Carrillo, Annie Dixon, Jean Fuertez, Don Guion, Penny Gray, Billy Gunn, Kyle Krauskopf, Maria Krauskopf, Uneeda Laitinen, Justin Martinez, Blanca Parkinson, Jenifer Pichinson, Gloria Route, Esquel Sanchez, Abel Serrata, Susan Westbrook, and Wanda Wilson are affected persons.

B. Which Issues Raised in the Hearing Requests Are Disputed

The affected persons discussed above raised the following issues:

1. Whether the proposed Facility and draft permit will negatively impact air quality, including whether the proposed emissions will cause or contribute to an exceedance of applicable National Ambient Air Quality Standards (NAAQS) or exceed allowable Prevention of Significant Deterioration (PSD) Increments.

(Raised by the following affected persons: Sierra Club, PCU, Dewey Magee)

2. Whether the application complies with BACT requirements.

(Raised by the following affected persons: Sierra Club, PCU)

3. Whether emissions from the proposed Facility will cause nuisance conditions, affecting the use and enjoyment of property, in violation of 30 TAC § 101.4.

(Raised by the following affected persons: Sierra Club, PCU, Dewey Magee)

4. Whether the application appropriately considered cumulative risks of nearby sources of pollution in accordance with Texas Water Code § 5.130.

(Raised by the following affected persons: Sierra Club, PCU)

5. Whether the proposed Facility and draft permit will adversely affect human health and domestic animals.

(Raised by the following affected persons: Sierra Club, PCU, Dewey Magee)

6. Whether the application's air quality analysis or its emissions calculation methodologies were flawed.

(Raised by the following affected persons: Sierra Club, PCU)

7. Whether the proposed air monitoring and reporting requirements are adequate to ensure compliance.

(Raised by the following affected persons: Sierra Club, PCU)

C. Whether the Dispute Involves Questions of Fact or of Law

If the Commission considers an issue to be one of fact, rather than one of law or policy, it is appropriate for referral to hearing if it meets all other applicable requirements. The issues raised here are issues of fact.

D. Whether the Issues Were Raised During the Public Comment Period

All issues were specifically raised by requestors who qualify as affected persons during the public comment period.

E. Whether the Hearing Requests are Based on Issues Raised Solely in a Withdrawn Public Comment

No public comments were withdrawn in this matter. Therefore, the hearing requests are not based on issues raised in withdrawn comments.

F. Whether the Issues are Relevant and Material to the Decision on the Application

The affected persons' hearing requests raise issues that are relevant and material to the Commission's decision under the requirements of 30 TAC § 55.201(d)(4)(B) and 55.211(c)(2)(A)(ii). To refer an issue to SOAH, the Commission must find that the issue is relevant and material to the Commission's decision to issue or deny this permit. Relevant and material issues are those governed by the substantive law under which this permit is to be issued. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248-51 (1986).

Air Quality, NAAQS, and PSD

Affected persons in this matter are concerned that the proposed emissions would negatively impact air quality—specifically that they would contribute to exceedances of NAAQS and exceed allowable PSD Increments. Under the Clean Air Act, the Environmental Protection Agency sets NAAQS for principal air pollutants, including Carbon Monoxide, Nitrogen Dioxide, and Sulfur Dioxide. 40 CFR § 50. The Facility would release several of these pollutants, and its potential to cause exceedances of NAAQS is essential in the Commission's decision regarding the Application. Further, by rule the Commission is precluded from issuing a permit for a major modification if it would cause or contribute to a violation of any NAAQS. *See* 30 TAC § 116.161. In addition, 30 § TAC 116.160

contains applicable requirements related to PSD review. Therefore, Issue no. 1 is relevant and material and is appropriate for referral to SOAH.

Best Available Control Technology

Affected persons in this matter are concerned that the Application's BACT analysis is deficient—specifically that it overstates the flare's ability to control volatile organic compound emissions during certain operating conditions and fails to consider enhanced flare operating, design, and monitoring requirements. Before issuing a permit for a facility, the TCAA requires the Commission to find that the facility “will use at least [BACT], considering the technical practicability and economic reasonableness of reducing or eliminating the emissions resulting from the facility[.]” THSC § 382.0518(b)(1). Therefore, Issue no. 2 is relevant and material to the Commission's decision regarding this application and is appropriate for referral to SOAH.

Nuisance Conditions

Affected persons in this matter are concerned that the proposed Facility would cause nuisance conditions, including light pollution. They worry that these conditions would drive them indoors and restrict their enjoyment of their property. The Commission's jurisdiction is created by the Texas Legislature. Nuisance from air contaminants is addressed by 30 TAC § 101.4, which requires that emissions not interfere with the normal use and enjoyment of property. Therefore, the Facility's potential to cause nuisance conditions is relevant and material to the Commission's decision whether to grant the Application. However, the Texas Legislature has not given TCEQ jurisdiction to address issues

regarding light pollution. Therefore, except as it relates to light pollution, Issue no. 3 is appropriate for referral to SOAH.

Cumulative Risk

Affected persons in this matter are concerned that the Application does not adequately protect the public from cumulative risks associated with air pollution. The Facility is in an area that has other nearby sources of air pollution, and the Commission is required by Tex. Water Code § 5.130 to consider cumulative risks in areas of concentrated operations. Therefore, the Application's adequacy to protect the public from cumulative risk is relevant and material to the Commission's decision whether to grant the Application and Issue no. 4 is appropriate for referral to SOAH.

Human Health and Domestic Animals

Affected persons in this matter are concerned with the adverse effects to air quality and its impacts on human health, property use, and domestic animals. They worry that worsened air quality associated with the Facility would drive them indoors. The Commission may only issue this permit if it finds no indication that the emissions from the Facility would contravene the intent of the TCAA, including protection of the public's health and physical property. TCAA § 382.0518(b)(2). Further, the purpose of the TCAA is to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare, and physical property—including domestic animals. TCAA § 382.002(a); *see also* TCAA § 382.003(3)(A). Therefore, Issue no. 5 is relevant and material to the

Commission's decision regarding this application and is appropriate for referral to SOAH.

Air Quality Analysis and Emissions Calculations

Affected persons in this matter are concerned that the Application uses flawed or outdated emissions calculation methodologies and generally has an unreliable air quality analysis. The accuracy of the Application's conclusions is central to the Commission's decision, and these conclusions could be inaccurate if the air quality analysis and emissions calculation methodologies are flawed. Therefore, Issue no. 6 is relevant and material to the Commission's decision regarding this application and is appropriate for referral to SOAH.

Air Monitoring and Reporting Requirements

Affected persons in this matter are concerned that the proposed air monitoring and reporting requirements are not adequate to ensure compliance and protect human health. Monitoring and recordkeeping requirements are contained in the draft permit's general and special conditions. Therefore, Issue no. 7 is relevant and material to the Commission's decision regarding this application and is appropriate for referral to SOAH.

G. Maximum Expected Duration for the Contested Case Hearing

Commission rule 30 TAC § 50.115(d) requires that any Commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides that, for applications filed on or after September 1, 2015, the administrative law judge must conclude the hearing and provide a

proposal for decision by the 180th day after the first day of the preliminary hearing, or a date specified by the Commission, whichever is earlier. 30 TAC § 50.115(d)(2). To assist the Commission in setting a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC § 55.209(e)(7), OPIC estimates that the maximum expected duration of a hearing on this Application would be 180 days from the first date of the preliminary hearing until the proposal for decision is issued.

IV. Conclusion

For the reasons discussed above, OPIC finds that Sierra Club, PCU, and Dewey Magee are affected persons. Therefore, OPIC respectfully recommends that the Commission grant these hearing requests, deny all other hearing requests, and refer this application for a contested case hearing at SOAH on Issue nos. 1-7 contained in §III.B with a maximum duration of 180 days.

Respectfully submitted,

Garrett T. Arthur
Public Interest Counsel

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CERTIFICATE OF SERVICE

I hereby certify that October 30, 2023, the original of the Office of Public Interest Counsel's Response to Requests for Hearing was filed with the Chief Clerk of the TCEQ and a copy was served on all persons listed on the attached mailing list via electronic mail, and/or by deposit in the U.S. Mail.



Josiah T. Mercer

MAILING LIST
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TCEQ DOCKET NO. 2023-1474-AIR

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REQUESTER(S):

See attached list.

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