

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



Garrett T. Arthur, *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 28, 2025

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 NUECES GREEN
AMMONIA FOR AIR QUALITY PERMIT NO. 174951
TCEQ DOCKET NO. 2025-0829-AIR**

Dear Ms. Gharis:

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

Sincerely,

A handwritten signature in cursive script that reads "Jessica M. Anderson".

Jessica M. Anderson, Attorney
Assistant Public Interest Counsel

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

Pranjal M. Mehta, Attorney
Assistant Public Interest Counsel

cc: Mailing List

DOCKET NO. 2025-0829-AIR

APPLICATION BY	§	BEFORE THE
NUECES GREEN AMMONIA LLC	§	
NUECES GREEN AMMONIA	§	TEXAS COMMISSION ON
PLANT ROBSTOWN, NUECES	§	
COUNTY	§	ENVIRONMENTAL QUALITY

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

To the Members of the Texas Commission on Environmental Quality:

The Office of Public Interest Counsel (OPIC) at the Texas Commission on Environmental Quality (TCEQ) files this Response to Requests for Hearing and Requests for Reconsideration on the application in the above-captioned matter and respectfully submits the following.

I. INTRODUCTION

A. Summary of Position

Before the Commission is an application by Nueces Green Ammonia LLC (Applicant or Nueces) for a New Source Review (NSR) Authorization under Texas Clean Air Act (TCAA) § 382.0518, which would authorize the construction of a new facility that may emit air contaminants. The Commission received numerous timely-filed hearing requests and requests for reconsideration. For the reasons detailed below, OPIC recommends the Commission grant the hearing requests of the Concerned Citizens of Robstown and Calallen (Concerned Citizens) and the following individuals: Myra Alaniz, Samuel Alaniz, Sandra Arizmendi, Kelley Carrillo, Kimberly Castaneda, Michael Castaneda, Anita Contreras, Deanna Contreras, Pablo Contreras, Eileen Doherty, Brittany Donald, David Donald,

Deborah Donald, Lawrence Fuhrken, Alvin Morin, Arsilia Morin, Yolanda Morin, and George Picha, Jr. OPIC further recommends the Commission refer the issues specified in Section III.B. for a contested case hearing at the State Office of Administrative Hearings (SOAH) with a maximum duration of 180 days. Further, OPIC recommends the Commission deny all pending requests for reconsideration.

B. Description of Application and Facility

If issued, this permit would authorize Applicant to construct the Nueces Green Ammonia Plant. The plant is proposed to be located at the southwest corner of FM 1889 and FM 46 north of Robstown, Nueces County. Contaminants authorized under this permit include anhydrous ammonia, carbon monoxide, hazardous air pollutants, nitrogen oxides, volatile organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, and sulfur dioxide.

C. Procedural Background

Nueces' application was received on December 26, 2023, and declared administratively complete on January 5, 2024. The Notice of Receipt and Intent to Obtain an Air Quality Permit for this application was published in English on February 1, 2024, in the *Corpus Christi Caller Times*, and in Spanish on February 1, 2024, in the *Tejano y Gruperio News*. The Notice of Application and Preliminary Decision for an Air Quality Permit was published on July 1, 2024, in English in the *Corpus Christi Caller Times*, and in Spanish in the *Tejano y Gruperio News*. A public meeting was held on July 29, 2024, in Robstown. The

public comment period ended on July 31, 2024. The Executive Director's (ED) Response to Comments (RTC) was mailed on March 12, 2025. The deadline to request a contested case hearing or to request reconsideration of the ED's decision was April 11, 2025.

II. APPLICABLE LAW

A. Hearing Requests

The Application was filed 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 30 Texas Administrative Code (TAC) § 55.21(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 requestor'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).

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

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

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.

B. Requests for Reconsideration

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

III. ANALYSIS OF HEARING REQUESTS

A. Whether the requestors are affected persons

Concerned Citizens of Robstown and Calallen

The Commission received timely comments and a hearing request from Concerned Citizens. Concerned Citizens is an unincorporated nonprofit association of residents from Robstown, Calallen, and the surrounding area who have organized with the purpose of protecting their quality of life, their environment, their health, and their community. For this reason, OPIC finds that

Concerned Citizens' stated purpose is germane to the interests they seek to protect.

In order for an association's hearing request to be granted, the request must identify one or more members, by name and physical address, that would otherwise have standing in their own right. The request submitted by Concerned Citizens identified several individuals who are members of the association and who reside in close proximity to the proposed facility: Samuel and Myra Alaniz, Alvin and Yolanda Morin, and Sandra and Humberto Arizmendi. These individuals provided their addresses in this hearing request and, according to the map created by ED staff, each of these individuals resides less than one mile from the proposed facility site. Furthermore, Concerned Citizens seek prospective or injunctive relief for their members, rather than damages or any type of relief that would inure solely to an individual member; therefore, the participation of any individual member is not required.

This hearing request raised concerns regarding air quality, human health, excess emissions, nuisance conditions, cumulative impacts, modeling, air monitoring, application accuracy and enforceability, and use of Best Available Control Technology (BACT).

While the concerns raised by Concerned Citizens are protected by the law under which the application will be considered, a reasonable relationship must exist between those interests and the regulation of emissions under the permit. As required for group standing under 30 TAC § 55.205, Concerned Citizens timely submitted comments; the interests the group seeks to protect are germane

to their purpose; neither the claim asserted nor the relief requested requires the participation of individual members; and their hearing request identifies members of the group that would otherwise have standing to request a hearing in their own right. Given the proximity of the proposed facility to the residences of the member individuals, the fact that Concerned Citizens' concerns are specific and protected by the law under which this application is considered, and a reasonable relationship exists between their concerns and the regulation of this facility, OPIC finds that one or more members of Concerned Citizens has a personal justiciable interest in this matter and qualifies as an affected person. Therefore, the Concerned Citizens of Robstown and Calallen group qualifies as an affected person.

Requestors Near the Facility Who Demonstrated Personal Justiciable Interest

The Commission received timely comments and hearing requests from Myra Alaniz (0.76 miles), Samuel Alaniz (0.74 miles), Sandra Arizmendi (0.07 miles), Kelley Carrillo (0.11 miles), Kimberly Castaneda (0.51 miles), Michael Castaneda (0.51 miles), Anita Contreras (0.09 miles), Deanna Contreras (0.09 miles), Pablo Contreras (0.09 miles), Eileen Doherty (0.55 miles), Brittany Donald (0.53 miles), David Donald (0.53 miles), Deborah Donald (0.53 miles), Lawrence Fuhrken (1.02 miles), Alvin Morin (0.11 miles), Arsilia Morin (0.53 miles), Yolanda Morin (0.11 miles), and George Picha, Jr. (0.94 miles). The map and appendix prepared by the ED's staff show that these requestors are located in close proximity to the facility. Collectively, they raise concerns regarding air quality

and monitoring, health effects, animal life, and potential impact on the environment.

These interests are protected by the law under which this application will be considered. 30 TAC § 55.203(c)(1). Further, considering their close proximity to the facility, a reasonable relationship exists between those interests and the Applicant's regulated activity – a relevant factor under 30 TAC § 55.203(c)(3). These requestors' relative proximity to the facility, when combined with their concerns regarding air quality and health effects, demonstrates that they are likely to be affected in a way not common to members of the general public, and thus possess a personal justiciable interest in this matter. *See* 30 TAC § 55.203(a). Therefore, OPIC concludes that these requestors qualify as affected persons.

Requestors Who Did Not Submit Timely Comments

The Commission received timely hearing requests from the following persons who did not file timely comments: Laurie Adams-Keyes (0.66 miles), Shane Adams (0.66 miles), Ralph Balko (2.72 miles), Miabella Baltierra (1.69 miles), Juanita Cadena (0.62 miles), Carlos Camacho (1.1 miles), Melissa Camacho (1.1 miles), Jazzlyn Castro (2.30 miles), Imelda Chapa (1.96 miles), Mr. Abel & Mrs. Abel Cortez (3.70 miles), Aaron De La Rosa (0.10 miles), Abel De La Rosa (0.10 miles), Cassandra Driscoll (0.21 miles), Christopher Driscoll (0.21 miles), Emily Esquivel (2.35 miles), Fernando Garcia (2.44 miles), Santos Garcia (2.44 miles), Hermelinda Garza (1.18 miles), Jorge Garza (2.53 miles), Luis L. Garza (2.55 miles), Luis Garza (1.18 miles), Ruben Garza (2.33 miles), John Ginn (3.25 miles), Christina Gomez (1.19 miles), Sally Gomez (7.53 miles), Alejandra Gonzalez (1.97

miles), Enrique Gonzalez (1.19 miles), Mark Heatherton (1.21 miles), Anna Hernandez (0.05 miles), Lauro Hernandez (0.41 miles), Marivel Hernandez (0.48 miles), Martina Hernandez (0.41 miles), Delia Herriman (1.32 miles), Ernest Herriman (1.32 miles), Clay Hilton (0.40 miles), Jaimee Hopfe (1.78 miles), Rebecca Ibarra (2.91 miles), Ruben Leal (0.72 miles), Veronica Leal (1.12 miles), Israel Longoria (0.62 miles), Nora Longoria (0.62 miles), San Luna (0.83 miles), Dianna Lum (0.38 miles), Rocky Lum (0.38 miles), Barbara Mann (0.21 miles), Monica Marines (0.86 miles), Irma Medrano (2.09 miles), Arthur Mireles (3.08 miles), Sandy Mireles (3.08 miles), Justin Morales (2.36 miles), Juan Moreno (2.35 miles), Apolonio Paredes Jr. (2.87 miles), Christopher Pruitt (1.29 miles), Janie Ramirez (0.72 miles), Robert Ramirez (2.89 miles), Sara Ramirez (0.29 miles), Lorenzo Rojas (0.85 miles), Magdalena Rojas (0.85 miles), Bobbie Salinas (2.05 miles), Alicia Trevino (2.00 miles), Jose Trevino (2.00 miles), Jeannettee Truax (0.59 miles), Jaslynne Vela (1.69 miles), Cosme Williams (1.43 miles), Mario Ybarra (0.32 miles), and Mary Ybarra (0.32 miles).

By law, for the Commission to find that a hearing requestor qualifies as an affected person, the requestor must have submitted timely comments on the application, and the request must be based only on that affected person's timely comments. *See* Texas Water Code (TWC) § 5.115(a)(a-1)(2)(B); 30 TAC § 55.201(c). Because these requestors have not complied with this requirement, OPIC is

unable to find that these requestors have demonstrated that they qualify as affected persons.¹

Requestors Who Are Relatively Distant from The Facility

The remaining hearing requestors who submitted timely comments and hearing requests also raise concerns regarding air quality and health effects. The map and appendix prepared by the ED's staff show that they are located relatively distant from the facility. Considering their distance from the facility, OPIC cannot find that these requestors are likely to be impacted by the facility's operations in a way that differs from the general public as required by 30 TAC § 55.203(a). The intervening distance diminishes any likelihood that the regulated activity will impact their health, safety, or use of property. Without a personal justiciable interest, a hearing requestor cannot qualify as an affected person. Therefore, OPIC finds that these requestors do not qualify as affected persons.

B. Which issues raised in the hearing requests are disputed

Requestors raised the following disputed issues:

1. Whether the draft permit is adequately protective of air quality.
2. Whether the draft permit is adequately protective of human health.
3. Whether the draft permit is adequately protective of animal life.
4. Whether the draft permit contains sufficient controls for excess emissions.

¹ While OPIC is unable to find that these requestors qualify as affected persons based on the information provided in their requests, we do note that pursuant to 30 TAC § 55.211(e), if any requests for contested case hearing are granted in this matter, and a preliminary hearing is convened at SOAH, any person whose request is denied may attend and seek to be admitted as a party.

5. Whether the draft permit is adequately protective against nuisance conditions.
6. Whether the draft permit adequately considers cumulative impacts.
7. Whether the application contains adequate modeling.
8. Whether the draft permit contains adequate air monitoring requirements.
9. Whether the submitted application was accurate.
10. Whether the terms of the draft permit are enforceable.
11. Whether the draft permit contains adequate BACT requirements.

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 in the request are issues of fact.

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

Issues 1-11 in Section III.C. were specifically raised by requestors 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 request is not based on issues raised in withdrawn public comments.

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

The 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 the State Office of Administrative Hearings

(SOAH), the Commission must find that the issue is relevant and material to the Commission's decision to issue or deny the permit. Relevant and material issues are those governed by the substantive law under which the permit is to be issued. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248-51 (1986).

Air Quality, Emissions, Human Health, and Animal Life

Under the Texas Clean Air Act, the Commission may issue this permit only if it finds no indication that the emissions from the facility will contravene the intent of the TCAA, including protection of the public's health and physical property. TCAA § 382.0518(b)(2). Because concerns about human health and animal life, as well as effects on the environment, could contravene the intent of the TCAA, these issues are relevant and material. 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. TCAA § 382.002(a). Therefore, Issues No. 1-4 are relevant and material to the Commission's decision regarding this Application.

Nuisance Conditions

Applicant must comply with 30 TAC § 101.4, which prohibits discharge of air contaminants in such concentration or duration as may be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property. Therefore Issue No. 5 is relevant and material.

Cumulative Impacts

By statute, the TCEQ must develop and implement policies, by specific environmental media, to protect the public from cumulative risks in areas of concentrated operations; and give priority to monitoring and enforcement in areas in which regulated facilities are concentrated. *See* Tex. Water Code § 5.130. Issue No. 6 is therefore relevant and material to the Commission's decision.

Application Accuracy and Modeling

TCEQ rules require that if an applicant becomes aware that it failed to submit relevant facts or submitted incorrect information in a permit application, the applicant is required to promptly submit such facts and information. Additionally, Applicant is required to submit all plans and specifications necessary to determine if the facility or source will comply with applicable federal and state air control statutes, rules, and regulations, as well as the intent of the TCAA. Texas Health and Safety Code (THSC) § 382.0515(2). Therefore, Issues No. 7 and 9 are relevant and material to the Commission's decision regarding this application and are appropriate for referral to SOAH.

Monitoring Requirements and Enforceability

The affected requestors in this matter have articulated concerns about the monitoring requirements contained in the draft permit and question its enforceability. The draft permit includes special conditions to ensure the Applicant can demonstrate compliance with the emission limitations set forth in the permit, and the Applicant is required to maintain records to demonstrate

compliance, including with the monitoring requirements. Therefore, Issues No. 8 and 10 are relevant and material to the decision on this application.

BACT

Under the Texas Clean Air Act, Applicant is required to use BACT. THSC § 382.0518(b)(l). Therefore, Issue No. 11 regarding BACT analysis and the use of BACT is relevant and material to the Commission's decision on this application.

H. Maximum expected duration for the contested case hearing

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

IV. REQUESTS FOR RECONSIDERATION

The Commission received timely requests for reconsideration from Lucia Abergo, Theresa Adams, Mullin Adkins, Faustino Alaniz Jr., Mandy Alaniz, Riva

Alaniz, Rhonda Alejandro, Cindy Almeida, Dalia Alvarez, Tiffany Amrich, Danika Anderwald, Darwin Anderson, Deborah Anderson, Albert Anzaldua, Greg Atchley, Clifton Bailey, Charles Baillie, Chelsea Baillie, Donald Baillie, Sallie Baillie, Velma Barrera, Norma Bayardo, Susan Belardinelli, Marlena Boatwright, Holly Bockholt, Kathleen Borhauer, Cordelia Bosquez, Pete Bosquez, Pat Botkin, Karen Boyd, Alyson Braden, Amber Brewer, Lauri Bristow, Adolfo Buentello, Arlene Burns, Larry Buxkamper, Alicia Cabrera, Dalmira Calderon, Gary Capeheart, Sharon Capeheart, Phyllis Carrier, John Carrillo, Kimberly Castaneda, Lucia Chavarria, Rosenda Chavez, Rachel Cipriano, Teresa Cisneros, Leticia Clark, Cynthia Cleavelin, Pablo Contreras, Carlos Costilla, Louise Cook, Robert Cook, Susan Cornett, Dale Crisman, Jo Cummings, Debra Davis, Sandra Davis, Jerimey Dear, Laurinda Dear, Giana Delaney, James Doty, Beverley Douglass, Martha Douglas, Jeffrey Durrwachter, Sonya Durrwachter, Mireille Dziuk, Glenna Elliff, Lydia Ferdin, Erica Flores, Lauren Gaddis, Marta Gaddis, Michael Gaddis, Suzanne Gallagher, Heidi Garcia, Samantha Garcia, Sandra Garcia, Alisha Garza, April Garza, Emma Garza, Sara Garza, Wendy Genz, Leticia Gomez, Edward Gonzalez, Jean Gonzalez, Yolanda Gonzales, Linda Goulet, Nova Gracia, Harriet Granderson, Amelia Green, Art Green, David Guzman, Harold Hansmann, Sara Hansmann, Michael Hatch, Tracie Hatch, Adrienne Havelka, Ronald Hellberg, Eusebio Hernandez Jr., Elida Hernandez, Jessica Hernandez, Leticia Hernandez, Manuel Hernandez, Mario Hernandez, Norma Hernandez, Richard Hernandez, Mary Hines, Crystal Horne, Jeff Horne, Terry Houchin, Kwamin Huff, William Hirko, Debbie Hunter, Carol Huntsinger, John Huntsinger, Venessa Idrogo, Candido

Jimenez, Natalile Jimenez, Jessica Keese, Adrienne Kerr, Janice Kimball, Brenda King, Ruth King, Terri Konarik, Lynn Lastrapes, Karen Lindeburg, Amanda Lopez, David Lopez, Sara Lopez, Leslie Lockwood, Ryan Lynes, Judy Macek, Steve Macek, Maryann Markert, Alexander Marroquin, Angela Marroquin, Ginger Martinez, Juan Martinez, Raymond Martinez, Rebecca Martinez, Dianna Mathews, Tommy Mcbroom, April McClure, Bill McGregor, Juan Mendoza, San Mendoza, Rosemary Mendoza, Francisco Miranda, Angelyn Moore, Brett Moore, Caleb Morales, Jimmy Morales, Lorraine Morales, Lucia Morales, Maegan Morales, Andrew Morin, Arsilia Morin, Leeann Garza, Leeann Mungia, Rachel Munoz, Ellen Murphy, Patricia Murphy, Enrique Naba, Noelia Naba, Cheryl Najvar, John Najvar, Christi Naylor, Diana O'Brien, Joe Ocanas, Ciera Pakebusch, Jennifer Pantoja, Jesicca Perez, Richard Perez, Julie Perkins, Arnoldas Pivorius, Terry Plumley, Claudia Regalado, Robin Reinhard, Kathy Rios, Oralia Rios, David Rivera, Sandy Rivera, Bonnie Rodriguez, Gabriel Rodriguez, Johny Rodriguez, Osvaldo Romero, Sylvia Romero, Mary Ross, William Ross, Horacio Rubio, Maurine Sacky, Alexis Salinas, Marcy Santos, Lorraine Sepulveda-Morales, Janie Serna, Maureen Swedlund, Jonathan Sharpless, Carolyn Shelby, Kadie Simmons, Stefanie Simmons, Rose Sims, Maina Smith, Don Stone, Sharon Story, Alma Studer, Paul Supak, Terri Supak, Jessica Svetlik, Charles Tenpenny, Dora Tenpenny, Johnnie Thompson, Kimberly Tompkins, Carmen Tilton, Joseph Tilton, Scott Tilton, Olga Tschoepe, Felix Vasquez, Rene Vazquez, Yvette Villalobos, Malynn Wahlen, Michael Wahlen, Carolyn Walter, Gina Wernig, Kris White, Sharon Williams, Crystal Williams, William Williams, Veronica Zamorano, and Martin Zurick articulating several

concerns pertaining to air quality, health risks, potential impact on the quality of life, public health and safety, lack of sufficient air monitoring stations, and environmental protection. While OPIC notes that most of these concerns are relevant and material to the Commission's decision on this application, a record establishing the evidentiary basis for reconsidering the ED's decision based on these issues would be needed to recommend that the request for reconsideration be granted. At this time, OPIC is recommending a contested case hearing on the issues as discussed in Section III.B., but prior to development of an evidentiary record, OPIC cannot recommend reversal of the ED's decision. Therefore, OPIC respectfully recommends denial of all pending requests for reconsideration.

V. CONCLUSION

For the reasons discussed above, OPIC respectfully recommends the Commission find Concerned Citizens, Myra Alaniz, Samuel Alaniz, Sandra Arizmendi, Kelley Carrillo, Kimberly Castaneda, Michael Castaneda, Anita Contreras, Deanna Contreras, Pablo Contreras, Eileen Doherty, Brittany Donald, David Donald, Deborah Donald, Lawrence Fuhrken, Alvin Morin, Arsilia Morin, Yolanda Morin, and George Picha, Jr. are affected persons in this matter and grant their hearing requests. OPIC further recommends the Commission refer the issues listed in section III.B. for a contested case hearing at SOAH with a maximum duration of 180 days. Finally, OPIC respectfully recommends denial of all requests for reconsideration.

Respectfully submitted,

Garrett T. Arthur
Public Interest Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2025, the original of the Office of Public Interest Counsel's Response to Requests for Hearing and Requests for Reconsideration was filed with the Chief Clerk of the TCEQ and a copy was served to all persons listed on the attached mailing list via Inter-Agency Mail, electronic mail, or by deposit in the U.S. Mail.

Pranjal
Pranjal M. Mehta

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TCEQ DOCKET NO. 2025-0829-AIR

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REQUESTER(S):

See attached list.

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