

## Laurie Gharis

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**From:** deborah donald <debdonald@sbcglobal.net>  
**Sent:** Monday, August 4, 2025 3:06 PM  
**To:** Laurie Gharis  
**Subject:** Response letters to OPIC's and ED Recommendations  
**Attachments:** Deborah Donalds response.pdf; David Donalds Response.pdf; Brittany Donalds Response.pdf

Dear Laurie: Thank you for returning my call today. I am forwarding my letter, my husbands letter and my daughters letter..  
Thank you again

Deborah Donald  
debdonald@sbcglobal.net  
361-813-1556

**Deborah Donald**  
4693 County Road 73  
Robstown, TX 78380  
(361)813-1556  
[debdonald@sbcglobal.net](mailto:debdonald@sbcglobal.net)

August 4, 2025

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

RE: Response to OPIC's and ED Recommendations- RCCH

Dear Commissioners Jo Niermann, Bobby Janecka, and Emily Lindley:

I am submitting my response regarding the Office of Public Interest Counsel's (OPIC) and the Executive Director's (ED) response on the application by Nueces Green Ammonia for Air quality Permit No 174951 (TCEQ Docket No 2025-0829-AIR).

First, I would like to thank both the Office of Public Interest Counsel and the Executive Director for their time and expertise in reviewing all of the requests submitted. I agree with OPIC's and the ED's recommendations to grant my request for a Contested Case Hearing.

I agree with OPIC's and the ED's determination that the issues raised and referred to SOAH are relevant, material, and warrant further examination. As my permanent residence on a 190-acre working ranch of horses, cattle, and active farmland is within 0.53 miles of the proposed site, these issues are directly relevant to me and make me an affected person. They include air quality and emission risks that would impact my health and physical property, as well as the health of livestock and wildlife on my property and crops produced from my farmland. Potential nuisance odor from the proposed plant would impact my enjoyment of my land and animals. It is important that extreme weather conditions be considered in the modeling of the proposed plant, including flooding, hurricane level winds, tornadoes, and freezes that have been known to lead to power outages and severe disruption of local infrastructure for extended periods of time. I also support the need for further examination of cumulative public health risks to my

community, inadequacies of the air monitoring that is proposed, whether the proposed permit meets all BACT requirements, and broader environmental impacts on the surrounding area.

It is particularly concerning that the air quality and cumulative impact analyses failed to account for emissions from the Permit by Rule (PBR) authorization for Avina Clean Hydrogen, a facility permitted to operate immediately adjacent to the proposed Avina Green Ammonia site. This omission further supports the need for a contested case hearing.

I also support OPIC's and the ED's recommendation that the following individuals and the Concerned Citizens group be recognized as affected persons:

Concerned Citizens of Robstown and Calallen, Myra Alaniz, Samuel Alaniz, Sandra Arizmendi, Kelley Carrillo, Kimberly Castaneda, Michael Castaneda, Anita Contreras, Deanna Conteras, Pablo Contreras, Eileen Doherty, Brittany Donald, David Donald, Deborah Donald, Lawrence Fuhrken, Alvin Morin, Arsilia Morin, Yolanda Morin, and George Picha, Jr.

I respectfully request that the Commission grant my and the Concerned Citizens of Calallen and Robstown affected persons request for a Contested Case Hearing at the State Office of Administrative Hearings (SOAH), with the maximum allowable duration of 180 days.

Given the significant and unresolved issues raised, I respectfully urge the Commissioners to adopt OPIC's and the ED's recommendations to grant my request for a Contested Case Hearing. This action is essential to ensure a complete evidentiary record and protect the health, safety, and welfare of the affected community.

Thank you for your careful consideration of this matter.

Sincerely,

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Deborah Donald

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**Brittany Donald**  
4693 County Road 73  
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[brittdonald@gmail.com](mailto:brittdonald@gmail.com)

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Thank you for your careful consideration of this matter.

Sincerely,

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Brittany Donald, DVM

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[grantpine025@gmail.com](mailto:grantpine025@gmail.com)

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Thank you for your careful consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Donald', with a stylized flourish at the end.

David Donald, M.D., F.R.C.S