

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 12, 2025

TO: All interested persons.

RE: Nueces Green Ammonia LLC
Air Quality Permit No. 174951

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any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting.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, a copy of the permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Corpus Christi Regional Office, and at the Keach Family Library, 1000 Terry Shamsie Boulevard, Robstown, Nueces County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Corpus Christi Regional Office, 500 North Shoreline Boulevard, Suite 500, Corpus Christi, 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 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. Your hearing request 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) The name of the applicant, the permit number and other numbers listed above so that your request may be processed properly.
- (3) 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."
- (4) 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.

Additionally, 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 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
Nueces Green Ammonia LLC
Air Quality Permit No. 174951

The Executive Director has made the Response to Public Comment (RTC) for the application by Nueces Green Ammonia LLC for Air Quality Permit No. 174951 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 (174951) 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, a copy of the permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Corpus Christi Regional Office, and at the Keach Family Library, 1000 Terry Shamsie Boulevard, Robstown, Nueces County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Corpus Christi Regional Office, 500 North Shoreline Boulevard, Suite 500, Corpus Christi, Texas..



COMISIÓN DE CALIDAD AMBIENTAL DE TEXAS

Protegiendo a Texas reduciendo y previniendo la contaminación

12 de marzo de 2025

TO: Todas las personas interesadas.

RE: Nueces Green Ammonia LLC
Permiso de Calidad del Aire N.º 174951

Decisión del Director Ejecutivo.

El director ejecutivo ha tomado la decisión de que la solicitud de permiso mencionada anteriormente cumple con los requisitos de la ley aplicable. **Esta decisión no autoriza la construcción u operación de ninguna instalación propuesta.** Esta decisión será considerada por los comisionados en una reunión pública programada regularmente antes de que se tome cualquier medida sobre esta solicitud, a menos que todas las solicitudes de audiencia o reconsideración de casos impugnados hayan sido retiradas antes de esa reunión.

Se adjuntan a esta carta las instrucciones para ver en Internet la Respuesta del Director Ejecutivo al Comentario Público (RTC). Las personas que prefieran una copia por correo del RTC o que tengan problemas para acceder al RTC en el sitio web, deben comunicarse con la Oficina del Secretario Oficial, por teléfono al (512) 239-3300 o por correo electrónico a chiefclk@tceq.texas.gov. Una copia completa del RTC (incluida la lista de correo), la solicitud completa, el borrador del permiso y los documentos relacionados, incluidos los comentarios públicos, están disponibles para su revisión en la Oficina Central de TCEQ. Además, una copia de la solicitud de permiso, la decisión preliminar del director ejecutivo y el borrador del permiso estarán disponibles para su visualización y copia en la Oficina Central de la TCEQ, la Oficina Regional de TCEQ Corpus Christi y en Keach Family Library, 1000 Terry Shamsie Boulevard, Robstown, Nueces County, Texas. El expediente de cumplimiento de la instalación, si existe, está disponible para revisión pública en la Oficina Regional de TCEQ Corpus Christi, 500 North Shoreline Boulevard, Suite 500, Corpus Christi, Texas.

Si no está de acuerdo con la decisión del director ejecutivo y cree que es una "persona afectada" como se define a continuación, puede solicitar una audiencia de caso impugnado. Además, cualquier persona puede solicitar la reconsideración de la decisión del director ejecutivo. Los procedimientos para la evaluación de la comisión de las solicitudes de audiencia/solicitudes de reconsideración se encuentran en 30 Código Administrativo de Texas, Capítulo 55, Subcapítulo F. A continuación, se presenta una breve descripción de los procedimientos para estas dos solicitudes.

Cómo solicitar una audiencia de caso impugnado.

Es importante que su solicitud incluya toda la información que respalde su derecho a una audiencia de caso impugnado. Su solicitud de audiencia debe demostrar que cumple con los

requisitos legales aplicables para que se le conceda su solicitud de audiencia. La consideración de la comisión de su solicitud se basará en la información que usted proporcione.

La solicitud debe incluir lo siguiente:

- (1) Su nombre, dirección, número de teléfono durante el día y, si es posible, un número de fax.
- (2) El nombre del solicitante, el número de permiso y otros números enumerados anteriormente para que su solicitud pueda procesarse adecuadamente.
- (3) Una declaración que exprese claramente que está solicitando una audiencia de caso impugnado. Por ejemplo, la siguiente declaración sería suficiente: "Solicito una audiencia de caso impugnado".
- (4) Si la solicitud es realizada por un grupo o asociación, la solicitud debe identificar:
 - (A) una persona por nombre, dirección, número de teléfono durante el día y, si es posible, el número de fax, de la persona que será responsable de recibir todas las comunicaciones y documentos para el grupo.;
 - (B) los comentarios sobre la solicitud presentada por el grupo que constituyen la base de la solicitud de audiencia; y
 - (C) por nombre y dirección física, uno o más miembros del grupo que de otro modo tendrían derecho a solicitar una audiencia por derecho propio. Los intereses que el grupo busca proteger deben estar relacionados con el propósito de la organización. Ni la reclamación alegada ni la reparación solicitada deben requerir la participación de los miembros individuales en el caso.

Además, su solicitud debe demostrar que usted es una "**persona afectada**". Una persona afectada es aquella que tiene un interés justiciable personal relacionado con un derecho, deber, privilegio, poder o interés económico legal afectado por la solicitud. Su solicitud debe describir cómo y por qué se vería afectado negativamente por la instalación o actividad propuesta de una manera que no sea común al público en general. Por ejemplo, en la medida en que su solicitud se base en estas preocupaciones, debe describir el impacto probable en su salud, seguridad o usos de su propiedad que puedan verse afectados negativamente por la instalación o las actividades propuestas. Para demostrar que tiene un interés personal justiciable, debe indicar, tan específicamente como pueda, su ubicación y la distancia entre su ubicación y la instalación o actividades propuestas. Una persona que pueda verse afectada por las emisiones de contaminantes del aire de la instalación tiene derecho a solicitar una audiencia de caso impugnado.

Su solicitud debe plantear cuestiones de hecho controvertidas que sean relevantes y materiales para la decisión de la comisión sobre esta solicitud que fueron planteadas **por usted** durante el período de comentarios públicos. La solicitud no puede basarse únicamente en cuestiones planteadas en los comentarios que haya retirado.

Para facilitar la determinación por parte de la comisión del número y alcance de los asuntos que se remitirán a la audiencia, usted debe: 1) especificar cualquiera de las respuestas del director ejecutivo a **sus** comentarios que usted disputa; 2) la base fáctica de la disputa; y 3) enumerar cualquier cuestión de derecho en disputa.

Cómo solicitar la reconsideración de la decisión del Director Ejecutivo.

A diferencia de una solicitud de audiencia de caso impugnado, cualquier persona puede solicitar la reconsideración de la decisión del director ejecutivo. Una solicitud de reconsideración debe contener su nombre, dirección, número de teléfono durante el día y, si es posible, su número de fax. La solicitud debe indicar que está solicitando la reconsideración de la decisión del director ejecutivo, y debe explicar por qué cree que la decisión debe ser reconsiderada.

Fecha límite para la presentación de solicitudes.

La oficina del Secretario Oficial debe **recibir** una solicitud de audiencia de caso impugnado o reconsideración de la decisión del director ejecutivo a más tardar **30 días calendario** después de la fecha de esta carta. Puede enviar su solicitud electrónicamente a www.tceq.texas.gov/agency/decisions/cc/comments.html o por correo a la siguiente dirección:

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

Procesamiento de solicitudes.

Las solicitudes oportunas para una audiencia de caso impugnado o para la reconsideración de la decisión del director ejecutivo se remitirán al Programa de Resolución Alternativa de Disputas de TCEQ y se incluirán en la agenda de una de las reuniones programadas regularmente de la comisión. Las instrucciones adicionales que explican estos procedimientos se enviarán a la lista de correo adjunta cuando se haya programado esta reunión.

Cómo obtener información adicional.

Si tiene alguna pregunta o necesita información adicional sobre los procedimientos descritos en esta carta, llame al Programa de Educación Pública, al número gratuito, 1-800-687-4040.

Atentamente,



Laurie Gharis
Secretaria Oficial

LG/erg

Recinto

RESPUESTA DEL DIRECTOR EJECUTIVO AL COMENTARIO DEL PÚBLICO
para
Nueces Green Ammonia LLC
Permiso de Calidad del Aire N.º 174951

El Director Ejecutivo ha puesto a disposición de Internet la respuesta al comentario público (RTC) para la solicitud de Nueces Green Ammonia LLC del Permiso de Calidad del Aire N.º 174951. Puede ver e imprimir el documento visitando la Base de Datos Integrada de los Comisionados de TCEQ en el siguiente enlace:

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

Para ver el RTC en el enlace anterior, ingrese el número de identificación TCEQ para esta solicitud (174951) y haga clic en el botón "Buscar". Los resultados de la búsqueda mostrarán un enlace al RTC.

Las personas que prefieran una copia por correo del RTC o que tengan problemas para acceder al RTC en el sitio web, deben comunicarse con la Oficina del Secretario Oficial, por teléfono al (512) 239-3300 o por correo electrónico a chiefclk@tceq.texas.gov.

Información adicional

Para obtener más información sobre el proceso de participación pública, puede comunicarse con la Oficina del Asesor de Interés Público al (512) 239-6363 o llamar al Programa de Educación Pública, al número gratuito, (800) 687-4040.

Una copia completa del RTC (incluida la lista de correo), la solicitud completa, el borrador del permiso y los documentos relacionados, incluidos los comentarios, están disponibles para su revisión en la Oficina Central de TCEQ en Austin, Texas. Además, una copia de la solicitud de permiso, la decisión preliminar del director ejecutivo y el borrador del permiso estarán disponibles para su visualización y copia en la Oficina Central de la TCEQ, la Oficina Regional de TCEQ Corpus Christi y en Keach Family Library, 1000 Terry Shamsie Boulevard, Robstown, Nueces County, Texas. El expediente de cumplimiento de la instalación, si existe, está disponible para revisión pública en la Oficina Regional de TCEQ Corpus Christi, 500 North Shoreline Boulevard, Suite 500, Corpus Christi, Texas.

MAILING LIST / LISTA DE CORREO
Nueces Green Ammonia LLC
Air Quality Permit No. / Permiso de Calidad del Aire N.º 174951

FOR THE APPLICANT /
PARA EL SOLICITANTE:

Karen White, Director Business
Development and Regulatory
Nueces Green Ammonia LLC
8 The Green, Suite A
Dover, Delaware 19901

Elizabeth Stanko, Director of ESG Advisory
Services
TRC Companies, Inc.
14701 Saint Mary's Lane, Suite 500
Houston, Texas 77079

INTERESTED PERSONS /
PERSONAS INTERESADAS:

See attached list. / Ver lista adjunta.

FOR THE EXECUTIVE DIRECTOR /
PARA EL DIRECTOR EJECUTIVO
via electronic mail /
por correo electrónico:

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

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

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

FOR PUBLIC INTEREST COUNSEL /
PARA ABOGADOS DE INTERÉS PÚBLICO
via electronic mail /
por correo electrónico:

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 /
PARA EL SECRETARIO OFICIAL
via electronic mail
por correo electrónico:

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

ADAMI , MR KARL K
4026 SADDLE TRL
ROBSTOWN TX 78380-6016

ADAMS , MICHAEL
3602 LAKE CHAMPAGNE
ROBSTOWN TX 78380-6181

ALANIZ , MYRA B
4695 FM 1889
ROBSTOWN TX 78380-2023

ALANIZ , SAMUEL Y
4695 FM 1889
ROBSTOWN TX 78380-2023

ALANIZ SR , SAMUEL Y
4695 FM 1889
ROBSTOWN TX 78380-2023

ALEMAN, JANIE & MORGAN, JIM
6267 FM 666
ROBSTOWN TX 78380-5246

ALLSUP , KATHERINE
4444 JOHN LN
ROBSTOWN TX 78380-6037

ALONZO , ESPERANZA
4230 BIG CYPRUS BYU
CORPUS CHRISTI TX 78410-5705

ALONZO JR , MR FELIX
4230 BIG CYPRUS BYU
CORPUS CHRISTI TX 78410-5705

ALONZO , FELIX
4230 BIG CYPRUS BYU
CORPUS CHRISTI TX 78410-5705

ALVARADO , BEATRIZ
APT 2
910 OHIO AVE
CORPUS CHRISTI TX 78404-2849

ALVARADO , NANCY
PO BOX 1806
CORPUS CHRISTI TX 78403-1806

ALVAREZ , MR IVAN
13926 RIVER ROCK DR
CORPUS CHRISTI TX 78410-5414

AMY , KIMBERLY
5354 PRAIRIE RIDGE DR
ROBSTOWN TX 78380-5898

ANDERSON , DARWIN J
14509 SPAULDING DR
CORPUS CHRISTI TX 78410-5514

ANDERSON , CLIFFORD
4638 CRYSTAL LN
CORPUS CHRISTI TX 78410-4005

ANDERWALD , DANIKA
15001 LAKE MEAD
ROBSTOWN TX 78380-6145

ARAIZA ORTIZ , ISABEL
326 POENISCH DR
CORPUS CHRISTI TX 78412-2710

AREVALO , ABRAHAM
421 E AVENUE C
ROBSTOWN TX 78380-3036

AREVALO , SHANNON
4017 NICHOLS DR
CORPUS CHRISTI TX 78410-5519

ARIZMENDI , SANDRA A
4519 FM 1889
ROBSTOWN TX 78380-2025

ARNOLD , TOMMIE SUE
5563 MARY GROVER ST
ROBSTOWN TX 78380-5504

ARREDONDO , ESTABAN
6825 IROQUOIS DR
CORPUS CHRISTI TX 78413-4697

ARRIAGA III , VICENTE J
436 W AVENUE G
ROBSTOWN TX 78380-2618

AVALOS , DAVID
723 W AVENUE D
ROBSTOWN TX 78380-2812

AVALOS , LETISIA
615 WRIGHT ST
ROBSTOWN TX 78380-3815

AVILA , PABLO
3563 COUNTY ROAD 48
ROBSTOWN TX 78380-6106

BAILEY , RAY
3615 OMA DR
SAN ANTONIO TX 78263-6005

BAILIE , CHARLES
7870 TRIPLE OAKS DR
CHINA GROVE TX 78263-4018

BAILIE , DONALD
649 PERUGIA
CIBOLO TX 78108-1964

BAILIE , SARAH
7870 TRIPLE OAKS DR
CHINA GROVE TX 78263-4018

BALLARD , REBECCA
APT 3C
4022 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5783

BARBEE , MARY NAJVAR
3864 RIVERVIEW CIR
ROBSTOWN TX 78380-5883

BARBER , JARRETT
4621 FM 1889
ROBSTOWN TX 78380-2054

BARBER , JENNIE
4631 FM 1889
ROBSTOWN TX 78380-2023

BARBER , JUDY LYNN
5037 SPUR LN
ROBSTOWN TX 78380-5826

BARBER , LESLIE
3606 WYATT DR
CORPUS CHRISTI TX 78410

BARRERA , EMILY
1013 BARRACUDA PL
CORPUS CHRISTI TX 78411-2101

BARRERA , RODOLFO
310 ASHBURN AVE
ROBSTOWN TX 78380-2215

BARRIOS , CANDACE
CORPUS CHRISTI
11510 WILLOWOOD CREEK DR
CORPUS CHRISTI TX 78410-3270

BELTRAN , EDUARDO
11514 SASPAMCO CREEK DR
CORPUS CHRISTI TX 78410-3214

BELTRAN , MELISSA
11514 SASPAMCO CREEK DR
CORPUS CHRISTI TX 78410-3214

BENAVIDES , CODY
1013 BARRACUDA PL
CORPUS CHRISTI TX 78411-2101

BERGER , GLORIA
4306 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5643

BERGER , MARK
4306 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5643

BERGMAN , KANDYCE
14102 RIVERWAY DR
CORPUS CHRISTI TX 78410-5408

BERGSTROM , TANYA
9501 LOVEBIRD ST
CORPUS CHRISTI TX 78418-5013

BERGSTROM , ROWDY
9501 LOVEBIRD ST
CORPUS CHRISTI TX 78418-5013

BIBERSTEIN , MRS MONA LISA
5339 RIVER TRAIL DR
ROBSTOWN TX 78380-5866

BICKHAM , GLENN ANN
3710 COUNTRY ESTATES DR
CORPUS CHRISTI TX 78410-4302

BLAIR , HAROLD
5412 RIVER TRAIL DR
ROBSTOWN TX 78380-5889

BOATWRIGHT , MARLENA
5481 MARCH ST
ROBSTOWN TX 78380-6034

BOAZMAN , ELIZABETH
192 WINDMILL RD
SHAVANO PARK TX 78231-1547

BOCAN , BLAKE
1313 SEALANE DR
CORPUS CHRISTI TX 78412-5310

BOCKHOLT , CHARLES
216 E WILDWOOD DR
CORPUS CHRISTI TX 78410-1724

BOCKHOLT , ELAINE S
UNIT B
4504 FM 1889
ROBSTOWN TX 78380-2016

BOCKHOLT , HOLLY
216 E WILDWOOD DR
CORPUS CHRISTI TX 78410-1724

BOCKHOLT , JARED
3321 TAHITI DR
CORPUS CHRISTI TX 78418-2929

BOSQUEZ , CORDELIA
CITY OF ROBSTOWN COUNCILWOMAN
117 CACTUS ST
ROBSTOWN TX 78380-2007

BOWERS , KATHLEEN
4050 RIDGE TRL
ROBSTOWN TX 78380-6020

BRAVENEC , KAREN
3931 MOLLIE LN
ROBSTOWN TX 78380-5814

BRELAND , AMANDA
APT 132
11930 LEOPARD ST
CORPUS CHRISTI TX 78410-3330

BRIONEZ , LUIS & ROSEMARY
5530 SUNRISE TRL
ROBSTOWN TX 78380-9103

BROOKS II , DOYLE LLOYD
4010 SADDLE TRL
ROBSTOWN TX 78380-6016

BROOKS , ROGER S
4017 SADDLE TRL
ROBSTOWN TX 78380-6016

BUENTELLO , ADOLFO
3676 JACK DR
ROBSTOWN TX 78380-5846

BUENTELLO , SYLVIA
208 ASHBURN AVE
ROBSTOWN TX 78380-2213

BULL , KATHERINE
4751 COUNTY ROAD 69
ROBSTOWN TX 78380-5805

BULL , MRS MEGAN
3554 COUNTY ROAD 50
ROBSTOWN TX 78380-5804

BULL , RYAN DAVID
3554 COUNTY ROAD 50
ROBSTOWN TX 78380-5804

BURCK , MRS SHARON
14717 ATTOYAC DR
CORPUS CHRISTI TX 78410-5693

BURNEY , CAROL & GARY
5374 PRAIRIE RIDGE DR
ROBSTOWN TX 78380-5898

BURNS , SISTER PATRICIA
3669 JACK DR
ROBSTOWN TX 78380-5845

BURTON , DALIA L
406 E AVENUE I
ROBSTOWN TX 78380-2323

BUSH , SHARON
3730 LA PAZ DR
CORPUS CHRISTI TX 78415-3637

BYRD , JAMES GARY
5452 AIKENS WAY
ROBSTOWN TX 78380-5941

BYRD , KAREN
5452 AIKENS WAY
ROBSTOWN TX 78380-5941

CABALLERO , RACHEL
APT 203
522 HANCOCK AVE
CORPUS CHRISTI TX 78404-2342

CALK , DAVID & LAURA
4133 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5640

CALLAWAY , MR JOHN R
4138 LONE OAK DR
ROBSTOWN TX 78380-5853

CALLAWAY , PATTY MARIE
4138 LONE OAK DR
ROBSTOWN TX 78380-5853

CAMARENA , LAURA
1617 SEABREEZE ST
ALICE TX 78332-6670

CAMPOS , MS SYLVIA
FOR THE GREATER GOOD
4410 FIR ST
CORPUS CHRISTI TX 78411-3635

CANTU , BENJAMIN & NORMA
3781 FM 1694
ROBSTOWN TX 78380-5751

CANTU , VANESSA
11634 CRIPPLE CREEK DR
CORPUS CHRISTI TX 78410-3739

CAPEHEART , GARY
4517 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5806

CAPEHEART , SHARON
4517 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5806

CARO , DR. AMANDA
4727 COUNTY ROAD 69
ROBSTOWN TX 78380-5805

CARRASCO , MELINDA
3019 LOST CREEK RD
ROBSTOWN TX 78380-5423

CARRIER , PHYLLIS
5375 PARTRIDGE
ROBSTOWN TX 78380-2037

CARRILLO , KELLEY JO
4537 FM 1889
ROBSTOWN TX 78380-2025

CARRILLO , JOHN COLE
5236 CAROUSAL LN
ROBSTOWN TX 78380-2047

CARRILLO , JOHN EDWARD
5236 CAROUSAL LN
ROBSTOWN TX 78380-2047

CASTANEDA , MRS ELSABETH
3722 PERFECTION LAKE AVE
ROBSTOWN TX 78380-6134

CASTANEDA , KIMBERLY
3674 JACK DR
ROBSTOWN TX 78380-5846

CASTANEDA , MICHAEL
3674 JACK DR
ROBSTOWN TX 78380-5846

CASTANEDA , NORMA
111 KISSLING AVE
ROBSTOWN TX 78380-2218

CASTILLO , ELIDA I
PO BOX 643
TAFT TX 78390-0643

CASTILLO , ELIDA I
131 LERDO ST
TAFT TX 78390-2222

CAVADA , ADELITA
4138 COUNTY ROAD 77
ROBSTOWN TX 78380-3825

CAVAZOS , ROSE
4322 PLATTE RIVER DR
CORPUS CHRISTI TX 78410-5721

CEDILLO , SONJA
863 W AVENUE D
ROBSTOWN TX 78380-2814

CERVANTES , AUDREY
1710 TULOSO CIR
CORPUS CHRISTI TX 78409-2226

CHAPMAN , MATT
2105 GERSHWIN LN
CORPUS CHRISTI TX 78414-2762

CHAPMAN , JEAN
4029 NICHOLS DR
CORPUS CHRISTI TX 78410-5519

CHARBA , KARL H
4964 COUNTY ROAD 40
ROBSTOWN TX 78380-4429

CHARLES , JOE R
905 N 1ST ST
ROBSTOWN TX 78380-2610

CHAVEZ , ROSIE
412 E AVENUE C
ROBSTOWN TX 78380-3037

CLEAVELIN , MRS CYNTHIA ANN
4118 COLONY DR
ROBSTOWN TX 78380-5912

CLEVELAND , DEBBIE
15402 BEDROCK DR
CORPUS CHRISTI TX 78410-5745

CLEVELAND , MICHAEL
15402 BEDROCK DR
CORPUS CHRISTI TX 78410-5745

CLOWDUS , RACHEL
6130 CORALRIDGE DR
CORPUS CHRISTI TX 78413-3136

COCRAN , MALENA DAWN
10757 DOGWOOD ST
CORPUS CHRISTI TX 78410-2701

COLEMAN , DR. HALEY
6233 FM 3088
SANDIA TX 78383-5605

COLES , DICH
15046 SANTA GERTRUDIS DR
CORPUS CHRISTI TX 78410-5823

CONCERNED CITIZEN , MALDONADO FAMILY
3810 VIOLET DR
CORPUS CHRISTI TX 78410-2927

CONCERNED CITIZEN , GRACE PRESCHOOL
14521 NORTHWEST BLVD
CORPUS CHRISTI TX 78410-5501

CONCERNED CITIZEN , PIERCE FAMILY
3673 COUNTY ROAD 52B
ROBSTOWN TX 78380-5938

CONTRERAS , ANITA
4527 FM 1889
ROBSTOWN TX 78380-2025

CONTRERAS , DEEANNA
4527 FM 1889
ROBSTOWN TX 78380-2025

CONTRERAS , PABLO
4527 FM 1889
ROBSTOWN TX 78380-2025

COOK , LOUISE
4176 BOBWHITE
ROBSTOWN TX 78380-6060

COOK , ROBERT
4176 BOBWHITE
ROBSTOWN TX 78380-6060

COSTILLA , CARLOS S
609 S HIGHWAY 77
ROBSTOWN TX 78380

CRANFORD , BETTE
3802 WILMONT DR
CORPUS CHRISTI TX 78410-2920

CRAVEY , CINDY
STE 240
5541 BEAR LN
CORPUS CHRISTI TX 78405-4129

CRAVEY , TAYLOR
STE 240
5541 BEAR LN
CORPUS CHRISTI TX 78405-4129

CRISP , LORI
4444 JOHN LN
ROBSTOWN TX 78380-6037

CRISP , MARCUS
4444 JOHN LN
ROBSTOWN TX 78380-6037

CRITTENDEN , MR & MRS
4030 BROWNWOOD CIR
CORPUS CHRISTI TX 78410-2809

CROOK , RUTH L
PO BOX 260594
CORPUS CHRISTI TX 78426-0594

CRUZ , YOLANDA
305 W 5TH ST
BISHOP TX 78343-2503

CUELLAR , MR CHRIS
5567 COUNTY ROAD 73
ROBSTOWN TX 78380-5897

CULBERTSON , MIKE
CORPUS CHRISTI REGIONAL ECONOMIC
DEVELOPMENT CORP
STE 1300S
800 N SHORELINE BLVD
CORPUS CHRISTI TX 78401-3700

CUNNINGHAM , CLINT & DAWN
310 W CONGRESSMAN SOLOMON P ORTIZ BLVD
ROBSTOWN TX 78380-5419

CUNNINGHAM , CLINT
310 W CONGRESSMAN SOLOMON P ORTIZ BLVD
ROBSTOWN TX 78380-5419

CUNNINGHAM , DAWN
310 W CONGRESSMAN SOLOMON P ORTIZ BLVD
ROBSTOWN TX 78380-5419

DAVIS , SANDRA
5409 PARTRIDGE
ROBSTOWN TX 78380-2036

DAVIS , AMANDA
12126 UP RIVER RD
CORPUS CHRISTI TX 78410-3327

DE LOS SANTOS , ANDREA KIARRA
3795 REYNA ST
ROBSTOWN TX 78380-4322

DE LOS SANTOS JR , MARTY
3795 REYNA ST
ROBSTOWN TX 78380-4322

DE LOS SANTOS , LIZA
3791 REYNA ST
ROBSTOWN TX 78380-4322

DE LOS SANTOS , MARTY
3795 REYNA ST
ROBSTOWN TX 78380-4322

DEAR , JERIMEY
5084 SIESTA LOOP
ROBSTOWN TX 78380-5863

DEAR , MRS LAURINDA
5084 SIESTA LOOP
ROBSTOWN TX 78380-5863

DEL GALLO , MRS TINA G
6469 FM 3088
SANDIA TX 78383-5630

DELUNA , AYELET
TRLR 105
130 W CORRAL AVE
KINGSVILLE TX 78363-3200

DENMAN , DENNIS L
3936 MOLLIE LN
ROBSTOWN TX 78380-5814

DENMAN , SHERI
3936 MOLLIE LN
ROBSTOWN TX 78380-5814

DENNIS , ROBERT
4124 EMIL ST
ROBSTOWN TX 78380-6010

DENNIS , SARA
4124 EMIL ST
ROBSTOWN TX 78380-6010

DIANE BAKER , DIANE
4084 BOBWHITE
ROBSTOWN TX 78380-6057

DIGESTI , VICTOR
3754 CABERNET
ROBSTOWN TX 78380-1127

DIXON , ANGELA
14405 PENTRIDGE DR
CORPUS CHRISTI TX 78410-5764

DIXON , JESSALYN
5484 LONESOME DOVE
ROBSTOWN TX 78380-5498

DOHERTY , SISTER EILEEN
3660 JACK DR
ROBSTOWN TX 78380-5846

DONALD , DR. DAVID M
PMB 614
4833 SARATOGA BLVD
CORPUS CHRISTI TX 78413-2213

DONALD , DEBORAH
4693 COUNTY ROAD 73
ROBSTOWN TX 78380-5349

DONALD , DR. BRITTANY
4693 COUNTY ROAD 73
ROBSTOWN TX 78380-5349

DONALD , DEBORAH M
PO BOX 260903
CORPUS CHRISTI TX 78426-0903

DOUGLASS , BEVERLEY S
3989 SADDLE TRL
ROBSTOWN TX 78380-6051

DRIVER , MRS ANDREA
4314 WOLF CREEK CT
CORPUS CHRISTI TX 78410-5638

DUCOTE , MELISSA M
NUECES GREEN AMMONIA
3979 RIDGE TRL
ROBSTOWN TX 78380-6019

DUGGER , BRUCE & JANIE
4510 RIVER PARK DR
CORPUS CHRISTI TX 78410-5671

DUNLAVY , TOMMY
ROBSTOWN HARDWARE
3806 W BARBER LN
ROBSTOWN TX 78380-5848

DUNN , ALICIA KAY
3222 EL DORADO DR
ROBSTOWN TX 78380-1347

DURAN , SARAH
APT 48
3034 PEACHTREE ST
CORPUS CHRISTI TX 78410-2577

DZIUK , ELLIOTT
14326 FAIRWAY DR
CORPUS CHRISTI TX 78410-5691

DZIUK , MIREILLE
14326 FAIRWAY DR
CORPUS CHRISTI TX 78410-5691

E , MACKENZIE
4330 CAPLIN DR
CORPUS CHRISTI TX 78410-3806

ECKEL , DEBORAH KOCUREK
PO BOX 398
POTH TX 78147-0398

EDDLEMON , APRIL
5135 AYMOND DR
ROBSTOWN TX 78380-5398

ELAM , JESSICA
3994 SADDLE TRL
ROBSTOWN TX 78380-6062

ELEY , PATRICIA
11802 MESA CIR
CORPUS CHRISTI TX 78410-3816

ELIZONDO , CHRISTINNA
C E BOOKKEEPING
11314 WOODWAY CREEK DR
CORPUS CHRISTI TX 78410-3210

ESCAMILLA , JEANESSA
APT 314
13801 IH 37
CORPUS CHRISTI TX 78410-4617

ESPINOZA , MS ROXANNA
453 W AVENUE G
ROBSTOWN TX 78380-2617

ESSIG , DEL
3975 BOBWHITE
ROBSTOWN TX 78380-6058

EVANS , MARIA LOUISA
11306 BLADES ST
CORPUS CHRISTI TX 78410-3119

EVANS , PHILLIP
11306 BLADES ST
CORPUS CHRISTI TX 78410-3119

EVANS , BOBBIE
107 N LAKEWAY
MATHIS TX 78368-4140

FAIN , LARAMIE
322 TEXAS AVE
CORPUS CHRISTI TX 78404-1709

FLORES , ALAN
CELANESE AMERICAS
5399 COUNTY ROAD 73A
ROBSTOWN TX 78380-6026

FLORES , PETE
5359 VICK LN
ROBSTOWN TX 78380-5851

FODDRILL SR , MR JOHN E
FODDRILL ENTERPRISES
9610 ELMFIELD PL
SAN ANTONIO TX 78254-6725

FORREST , DARCI D
3974 BOBWHITE
ROBSTOWN TX 78380-6059

FORREST , PAISLEY
3974 BOBWHITE
ROBSTOWN TX 78380-6059

FORREST , THOMAS
3974 BOBWHITE
ROBSTOWN TX 78380-6059

FORTNER , JAMES
ANNAVILLE AIR CONDITIONING INC
4860 FM 1889
ROBSTOWN TX 78380-5854

FORTNER , DOTTIE
4860 FM 1889
ROBSTOWN TX 78380-5854

FOUGHT , ALLISON
14813 MELEX DR
CORPUS CHRISTI TX 78410-5547

FRANCO , JAVIER O
102 KISSLING AVE
ROBSTOWN TX 78380-2219

FRANCO , BRIANNA
102 KISSLING AVE
ROBSTOWN TX 78380-2219

FREDERICK , DR. GREG
4573 RIVER PARK DR
CORPUS CHRISTI TX 78410-5686

FREDERICK , DR. KAREN
4573 RIVER PARK DR
CORPUS CHRISTI TX 78410-5686

FROST , KIM
KIM FROST ATTORNEY AT LAW
807 CRAIG ST
CORPUS CHRISTI TX 78404-2021

FUHRKEN , MR LARRY
3600 COUNTY ROAD 50
ROBSTOWN TX 78380-5936

FULTON , CATHY
PO BOX 457
PORT ARANSAS TX 78373-0457

GALLAGHER , MS SUZANNE
5419 RIVERVIEW DR
ROBSTOWN TX 78380-5881

GALVAN , AMANDA
1801 BOSQUEZ ST
ROBSTOWN TX 78380-2148

GAMBOA , MARISSA
13129 COUNTRY SIDE CIR
CORPUS CHRISTI TX 78410-4431

GARCIA , CANDACE
630 WRIGHT ST
ROBSTOWN TX 78380-3853

GARCIA , JUAN S
9222 EVENING STAR LN
CORPUS CHRISTI TX 78409-2602

GARCIA , SANTIAGO
630 WRIGHT ST
ROBSTOWN TX 78380-3853

GARCIA , ALEXIS
3214 LANCER
ROBSTOWN TX 78380-1410

GARCIA , ASHLEY R
3613 LAKE CHAMPAGNE
ROBSTOWN TX 78380-6181

GARCIA , MR BOBBY
4326 BIG CYPRUS BYU
CORPUS CHRISTI TX 78410-5799

GARCIA , HANNAH
319 W CONGRESSMAN SOLOMON P ORTIZ BLVD
ROBSTOWN TX 78380-5493

GARCIA , JASON
3214 LANCER
ROBSTOWN TX 78380-1410

GARCIA , MARIA E
APT 8B
4302 WESTERN DR
CORPUS CHRISTI TX 78410-3883

GARCIA , RACHEL
15210 GUADALUPE RIVER DR
CORPUS CHRISTI TX 78410-5734

GARCIA , TANYA ANGELY
9501 LOVEBIRD ST
CORPUS CHRISTI TX 78418-5013

GARZA , APRIL
4206 MEDINA SPGS
CORPUS CHRISTI TX 78410-5614

GARZA , SARA
15134 SHOSHONE DR
CORPUS CHRISTI TX 78410-5722

GAVLIK , CAREN
5350 RIVER TRAIL DR
ROBSTOWN TX 78380-5811

GEIS , MRS BARBARA
14918 BEAL DR
CORPUS CHRISTI TX 78410-5814

GENZ , MRS WENDY
14102 RIVER ROCK DR
CORPUS CHRISTI TX 78410-5422

GEORGE , JOSHUA LEE
4009 COLUMBIA RIVER DR
CORPUS CHRISTI TX 78410-5549

GILLIHAN , SHELBY
5214 CAROUSAL LN
ROBSTOWN TX 78380-2047

GOMEZ , FRANK & OMAR
1613 SOUTHEASTERN TRL
ROUND ROCK TX 78664-7053

GOMEZ , LAURA
10705 LARKWOOD ST
CORPUS CHRISTI TX 78410-2711

GOMEZ , SONIA
401 W AVENUE D
ROBSTOWN TX 78380-2923

GONZALES , MRS CANDACE D
4534 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5735

GONZALEZ , ANA
846 MESQUITE LN
ROBSTOWN TX 78380-2141

GONZALEZ , IRMA
201 AVALON DR
ROBSTOWN TX 78380-2001

GONZALEZ , MR ARNOLDO
846 MESQUITE LN
ROBSTOWN TX 78380-2141

GONZALEZ , CRISTEL
3901 SHIVA DR
CORPUS CHRISTI TX 78410-1201

GONZALEZ , FLOYD
524 W MAIN AVE
ROBSTOWN TX 78380-3247

GONZALEZ , FRED
LOT 40
1207 N US HIGHWAY 77
ROBSTOWN TX 78380-2451

GONZALEZ , JOSE
5716 SANTA CLARA DR
ROBSTOWN TX 78380-9403

GRACIA , JENNIFER
1118 CRESCENT DR
CORPUS CHRISTI TX 78412-3522

GRALEY , KIMBERLIE KAYE
3803 COUNTY ROAD 77
ROBSTOWN TX 78380-5404

GRANT , MELANIE
4201 BOBWHITE
ROBSTOWN TX 78380-6055

GREEN , MRS CHERYL
15410 GUADALUPE RIVER DR
CORPUS CHRISTI TX 78410-5743

GREEN , REVEREND RALPH
CHRISTCENTRAL BAPTIST CHURCH
PO BOX 260538
CORPUS CHRISTI TX 78426-0538

GUAJARDO , MRS MICHELLE
1041 IOWA ST
ROBSTOWN TX 78380-3428

GUERRA , RACHEL
202 E AVENUE F
ROBSTOWN TX 78380-2714

GUERRA , ALLISON
14221 BOWMAN CT
ROBSTOWN TX 78380-2031

GUERRA , VERONICA
3685 COUNTY ROAD 50
ROBSTOWN TX 78380-5860

GUERRA , VERONICA
3585 COUNTY ROAD 50
ROBSTOWN TX 78380-5804

GUERRA , VERONICA
3586 COUNTY ROAD 50
ROBSTOWN TX 78380-5804

GUTIERREZ , AARON
4483 N OAK CIR
ROBSTOWN TX 78380-5509

GUTIERREZ , LELA
4120 SIERRA ST
CORPUS CHRISTI TX 78410-3848

GUTIERREZ , MERCEDES
514 W AVENUE C
ROBSTOWN TX 78380-2916

GUTIERREZ , MIGUEL
6453 EASLEY LN
SANDIA TX 78383-9619

GUZMAN , DR. DAVID
4301 CLEAR FORK CT
CORPUS CHRISTI TX 78410-5602

HAAS , SUZANNE
5719 SANTA CLARA DR
ROBSTOWN TX 78380-9453

HAGGERTON , HOLDEN
14709 KEEGAN
CORPUS CHRISTI TX 78410-5695

HAHN , MCKENZIE
4407 SE 28TH AVE
PORTLAND OR 97202-3611

HALBERDIER , MARIA CRISTINA
11405 WOODWAY CREEK DR
CORPUS CHRISTI TX 78410-3218

HALE , MR JASON R
4421 HAMLIN DR
CORPUS CHRISTI TX 78411-3059

HANKE JR , KENNETH WAYNE
4504 FM 1889
ROBSTOWN TX 78380-2016

HANKE , LISA BOCKHOLT
4504 FM 1889
ROBSTOWN TX 78380-2016

HANKINS , NHU
16034 NORTHWEST BLVD
ROBSTOWN TX 78380-5914

HARTMAN , BETH
14661 SWEET WATER CREEK DR
CORPUS CHRISTI TX 78410-5637

HARVEY , MIKE W
5120 COUNTY ROAD 77
ROBSTOWN TX 78380-5512

HATCH , TRACIE
4416 COUNTY ROAD 56
ROBSTOWN TX 78380-9300

HEATHERTON , MARK S
109 AVALON DR
ROBSTOWN TX 78380-2009

HELLBERG , RENEE & RON
PO BOX 261014
CORPUS CHRISTI TX 78426-1014

HELLBERG II , MR RONALD T
PO BOX 261014
CORPUS CHRISTI TX 78426-1014

HENDERSON , SILVIA G
3009 CHARLES DR
CORPUS CHRISTI TX 78410-1921

HENSIEK-FAIN , AUTUMN
322 TEXAS AVE
CORPUS CHRISTI TX 78404-1709

HERNANDEZ , ANGELA
1033 ILLINOIS ST
ROBSTOWN TX 78380-3407

HERNANDEZ , EMILY
4655 SHARPSBURG RD
CORPUS CHRISTI TX 78410-5000

HERNANDEZ , FERNANDO
4979 BLUEBIRD ST
ROBSTOWN TX 78380-2029

HERNANDEZ , JUDY
4503 SKYHAWK ST
ROBSTOWN TX 78380-3816

HERNANDEZ , LAURA
2531 VIOLA AVE
CORPUS CHRISTI TX 78415-1539

HERNANDEZ , LESLIE
4979 BLUEBIRD ST
ROBSTOWN TX 78380-2029

HERNANDEZ , MS P
4525 ODEM DR
CORPUS CHRISTI TX 78415-5119

HERNANDEZ , ROBERT G COMMISSIONER
PRECINCT 1
NUECES COUNTY
4114 REHFELD RD
CORPUS CHRISTI TX 78410-4136

HERNANDEZ , ROBERTO G COMMISSIONER
COUNTY OF NUECES
RM 303.05
9901 LEOPARD ST
CORPUS CHRISTI TX 78410-1613

HERNANDEZ , YOLANDA
LOT 300
4655 SHARPSBURG RD
CORPUS CHRISTI TX 78410-5000

HERNANDEZ , RICHARD
533 W AVENUE B
ROBSTOWN TX 78380-3222

HERRERO , ABEL & MATILDA
PO BOX 2910
AUSTIN TX 78768-2910

HERRERO , ABEL & MATILDA
4557 TEAL DR
CORPUS CHRISTI TX 78410-5816

HERRERO , THE HONORABLE ABEL STATE
REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 34
PO BOX 2910
AUSTIN TX 78768-2910

HERRERO , THE HONORABLE ABEL STATE
REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 34
STE 103A
606 N CARANCAHUA ST
CORPUS CHRISTI TX 78401-0699

HERRERO , MATILDA
PO BOX 2910
AUSTIN TX 78768-2910

HERRERO , MATILDA
4557 TEAL DR
CORPUS CHRISTI TX 78410-5816

HERRINGTON , MARIANN
5358 COUNTY ROAD 75
ROBSTOWN TX 78380-6029

HIGERD , GWEN
3609 COX CIR
CORPUS CHRISTI TX 78410-4305

HINDS , BOBBY
15025 LAKE MEAD
ROBSTOWN TX 78380-6145

HINDS , SHEILA
15025 LAKE MEAD
ROBSTOWN TX 78380-6145

HINES , B SCOTT
14706 CALAMITY CT
CORPUS CHRISTI TX 78410-5658

HINES , SHERYL
4133 FM 24
ROBSTOWN TX 78380-5767

HINOJOSA , ART
4050 FM 1694
ROBSTOWN TX 78380-5651

HINOJOSA , THE HONORABLE JUAN "CHUY" STATE
SENATOR
THE SENATE OF TEXAS DISTRICT 20
PO BOX 12068
AUSTIN TX 78711-2068

HINOJOSA , THE HONORABLE JUAN "CHUY" STATE
SENATOR
THE SENATE OF TEXAS DISTRICT 20
STE 200
602 N STAPLES ST STE 240
CORPUS CHRISTI TX 78401-1018

HODGES , CHELSEA
14501 REAGAN DR
CORPUS CHRISTI TX 78410-5528

HOELSCHER , MR BRUCE K
3646 COUNTY ROAD 52B
ROBSTOWN TX 78380-5937

HOELSCHER , KLINT
5672 WESTLAKE
SANDIA TX 78383-9618

HOELSCHER , MICHELE
4016 SADDLE TRL
ROBSTOWN TX 78380-6016

HOELSCHER , PENNY
3646 COUNTY ROAD 52B
ROBSTOWN TX 78380-5937

HOLLOWAY , DEBORAH
APT 2106
14838 NORTHWEST BLVD
CORPUS CHRISTI TX 78410-2417

HORNE , MARYBETH
4210 SPRING CREEK DR
CORPUS CHRISTI TX 78410-5554

HUERTA , ANDRES
4314 PLATTE RIVER DR
CORPUS CHRISTI TX 78410-5721

HUERTA , LAURA
4314 PLATTE RIVER DR
CORPUS CHRISTI TX 78410-5721

HUGHES , JEANETTE
14702 POWELL DR
CORPUS CHRISTI TX 78410-5525

HUGHSON , M
PO BOX 2201
ORANGE GROVE TX 78372-2201

HUGHSON , MELISSA
PO BOX 9605
CORPUS CHRISTI TX 78469-9605

HUGHSON , MELISSA
PO BOX 2201
ORANGE GROVE TX 78372-2201

HUNT , JEFFREY
3890 VAUGHN CIR
ROBSTOWN TX 78380-5887

HURST , KATHLEEN
13636 SMITH DR
CORPUS CHRISTI TX 78410-4826

IVEY , MRS REAGAN
5011 COUNTY ROAD 83
ROBSTOWN TX 78380-5221

JERNIGAN , BETTY & JERRY
3909 REAGAN LN
ROBSTOWN TX 78380-5815

JERNIGAN , JERRY
3909 REAGAN LN
ROBSTOWN TX 78380-5815

JIMENEZ , LETICIA
810 NUECES ST
ROBSTOWN TX 78380-2145

JOHNSON , LINDA
14611 SPRING CREEK DR
CORPUS CHRISTI TX 78410-5746

JOHNSON , MARY LOUISE
4120 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5639

JONES , MR DENNIS CRAIG
4334 SAINT GEORGE DR
CORPUS CHRISTI TX 78413-2531

JONES , PATRICIA TABER
4334 SAINT GEORGE DR
CORPUS CHRISTI TX 78413-2531

JUAREZ , RUMALDO Z
15261 PECOS RIVER DR
CORPUS CHRISTI TX 78410-5719

KAPA , MATTESON
2805 SAGE BRUSH DR
CORPUS CHRISTI TX 78410-2135

KAPA , STEVE
3802 CASTLE VALLEY DR
CORPUS CHRISTI TX 78410-3610

KEIPER , DON
144 LAKEVIEW DR
LAKE CITY TX 78368-9437

KERR , ADRIENNE
14652 SWEET WATER CREEK DR
CORPUS CHRISTI TX 78410-5636

KESTNER , JUDY
4437 CLEAR FORK DR
CORPUS CHRISTI TX 78410-5608

KIMBALL , JANICE
3621 COX CIR
CORPUS CHRISTI TX 78410-4305

KIMMEL , MR MATTHEW L
14757 PRAIRIE CREEK DR
CORPUS CHRISTI TX 78410-5620

KIMMEL , TERRI
14757 PRAIRIE CREEK DR
CORPUS CHRISTI TX 78410-5620

KING , RICHARD C
14927 SANDY CREEK CT
CORPUS CHRISTI TX 78410-5699

KING , DR. ALEXIS
3721 PERFECTION LAKE AVE
ROBSTOWN TX 78380-6134

KING , KEVIN
3721 PERFECTION LAKE AVE
ROBSTOWN TX 78380-6134

KIRKLAND SR , JOSHUA
4916 AMBER RD
ROBSTOWN TX 78380-4396

KIRKLAND , MONICA R
4916 AMBER RD
ROBSTOWN TX 78380-4396

KLAWINSKY , MRS CASSAUNDRA
4233 RAPIDS DR
CORPUS CHRISTI TX 78410-5708

KLEIN , JAMES E
COASTAL BEND SIERRA CLUB GROUP
3501 MONTERREY ST
CORPUS CHRISTI TX 78411-1709

KOCUREK , PATRICIA
PO BOX 1324
CORVALLIS OR 97339-1324

KOENNING , RHONDA K
14710 KEEGAN
CORPUS CHRISTI TX 78410-5694

KONIAKOWSKY , JOE
16522 FM 624
ROBSTOWN TX 78380-6025

KOZAK , MS RENEE
PO BOX 261014
CORPUS CHRISTI TX 78426-1014

KRIZAK , GAYLON & JEANETTE
4033 MOORHEAD DR
CORPUS CHRISTI TX 78410-5522

KRIZAK , MS COLLEEN ANN
4033 MOORHEAD DR
CORPUS CHRISTI TX 78410-5522

KRIZAK , JEANETTE ALLEN
4033 MOORHEAD DR
CORPUS CHRISTI TX 78410-5522

LAHAYE , INGRID ISABELLE
21708 COUNTY ROAD 1718
MATHIS TX 78368-4250

LANER , TY
14902 NORTHWEST BLVD
CORPUS CHRISTI TX 78410-5511

LARA , RUBY ANN
APT 317
630 WRIGHT ST
ROBSTOWN TX 78380-3853

LAROSE , BRENDA & GARY
5785 GRAND LAKE CIR
ROBSTOWN TX 78380-5364

LAWHON , RYAN
4672 FM 624
ROBSTOWN TX 78380-9112

LAYTON , MARCIA
APT 9D
4301 WESTERN DR
CORPUS CHRISTI TX 78410-3875

LEAL , STEPHANY
4193 WADE ST
ROBSTOWN TX 78380-6028

LEE , DARLENE
PO BOX 4597
CORPUS CHRISTI TX 78469-4597

LHIRONDELLE , LEANNE
150 SINCLAIR ST
CORPUS CHRISTI TX 78411-1334

LIGHT , RANDY
3709 AMANDA LN
ROBSTOWN TX 78380-2026

LIGON , ALICE T
3548 COUNTY ROAD 50
ROBSTOWN TX 78380-5804

LITTLEJOHN , JENNIFER MARIE
3225 MANASSAS LN
CORPUS CHRISTI TX 78410-2444

LONGORIA , JANE
4592 FM 1889
ROBSTOWN TX 78380-2021

LONGORIA JR , SAM
4592 FM 1889
ROBSTOWN TX 78380-2021

LONGORIA , MELISSA H
3674 COUNTY ROAD 48
ROBSTOWN TX 78380-5855

LONGORIA , NORMA
300 KISSLING AVE
ROBSTOWN TX 78380-2223

LONGORIA , TARAH
300 KISSLING AVE
ROBSTOWN TX 78380-2223

LONGUEIRA , RICK
16441 FM 624
ROBSTOWN TX 78380-6046

LOPEZ , SARA
PO BOX 202
ROBSTOWN TX 78380-0202

LOPEZ JR , DANIEL
3725 PERFECTION LAKE AVE
ROBSTOWN TX 78380-6134

LOPEZ , EDWIN
5498 COVEY PL
ROBSTOWN TX 78380-2048

LORENZ , ROCKY
5093 COUNTY ROAD 79
ROBSTOWN TX 78380-5348

LUCIO , MARIE
4899 COUNTY ROAD 30
ROBSTOWN TX 78380-4393

LUNA , AMY
4040 MOUNTAIN VIEW DR
CORPUS CHRISTI TX 78410-3820

LUNA , MIRANDA
311 KISSLING AVE
ROBSTOWN TX 78380-2222

LUNA-SALDANA , SUSIE EDUCATION CHAIR
LULAC COUNCIL NO 1
4710 HAKEL DR
CORPUS CHRISTI TX 78415-2826

LYTLE , MONNA L
PO BOX 9534
CORPUS CHRISTI TX 78469-9534

M , RANDY
3499 E MAIN AVE
ROBSTOWN TX 78380

MAJEK , CHERYL
101 ASHBURN AVE
ROBSTOWN TX 78380-2210

MALEK , MAGGIE
PO BOX 78
CONCAN TX 78838-0002

MALEK , JAMES R
3723 MALEK LN
ROBSTOWN TX 78380-2028

MALONE , MELINDA
11802 LORI DR
CORPUS CHRISTI TX 78410-3814

MANNING , CURTIS
PRECISION SPECIALTY
10526 PIONEER DR
CORPUS CHRISTI TX 78410-2130

MAREZ , EDWARD JOHN
521 VAKY ST
CORPUS CHRISTI TX 78404-2608

MARKERT , MARYANN
4129 RAPIDS DR
CORPUS CHRISTI TX 78410-5701

MARQUEZ , JOANNE
5412 RIVERVIEW DR
ROBSTOWN TX 78380-5880

MARROQUIN , MR ALEXANDER
4494 FM 1889
ROBSTOWN TX 78380-2055

MARROQUIN , MRS ANGELA
4494 FM 1889
ROBSTOWN TX 78380-2055

MARTINEZ , EMMA
717 BOWEN ST
PLEASANTON TX 78064-2813

MARTINEZ , GABRIELLA
APT 2626
1540 W BITTERS RD
SAN ANTONIO TX 78248-1485

MARTINEZ , GINGER
APT 118
119 CIRCLE CT
PLEASANTON TX 78064-2913

MARTINEZ , GINGER
PO BOX 445
PLEASANTON TX 78064-0445

MARTINEZ , JUAN
717 BOWEN ST
PLEASANTON TX 78064-2813

MARTINEZ , RAYMOND
APT 118
119 CIRCLE CT
PLEASANTON TX 78064-2913

MARTINEZ , REBECCA
11406 GAYLORD DR
SAN ANTONIO TX 78224-2950

MARTINEZ , BIANCA
3730 BROOKHILL DR
CORPUS CHRISTI TX 78410-4429

MATHISEN , PATTI
16510 FM 624
ROBSTOWN TX 78380-6025

MATTHEWS , BOB
5322 WAGON TRL
ROBSTOWN TX 78380-9792

MCCAIN , JAMES
3942 HALL LN
ROBSTOWN TX 78380-5836

MCCLOY , CHRISTINE
5567 COUNTY ROAD 73
ROBSTOWN TX 78380-5897

MCDERMOTT , DORIS & DORIS
110 RIVULET LN
LAKEWAY TX 78738-6588

MCDERMOTT , DORIS & DORIS
110 RIVULET LN
LAKEWAY TX 78738-6588

MCDERMOTT , DORIS
119 RIVULET LN
LAKEWAY TX 78738-6588

MCGRAW , MRS KORINA
13122 MCBURNETT DR
CORPUS CHRISTI TX 78410-4419

MCGREGOR , BILL
4030 MOUNT RAINIER DR
CORPUS CHRISTI TX 78410-5548

MCKAY , ELI
1008 MARGUERITE ST
CORPUS CHRISTI TX 78401-3319

MCKESSON , DAVID EVERETT
4037 MOUNT RAINIER DR
CORPUS CHRISTI TX 78410-5548

MCKNIGHT , JOHN
700 BROADLEAF
SCHERTZ TX 78154-2662

MCNABB , MRS LAUREN
13106 DEEPWATER CIR
CORPUS CHRISTI TX 78410-4446

MCNABB , RYAN W
MCNABB MICROFARM LLC
13106 DEEPWATER CIR
CORPUS CHRISTI TX 78410-4446

MCVAY , ELIZABETH
14665 SWEET WATER CREEK DR
CORPUS CHRISTI TX 78410-5637

MEINECKE , MITCH
11801 CHAMIZAL ST
CORPUS CHRISTI TX 78410-3807

MENN , ALLEN
4460 FM 1889
ROBSTOWN TX 78380-2055

MENN , BRADEN
4460 FM 1889
ROBSTOWN TX 78380-2055

MENN , REBECCA
4460 FM 1889
ROBSTOWN TX 78380-2055

MERRITT , DAVID
5212 CAROUSAL LN
ROBSTOWN TX 78380-2047

MERRITT , MR GLEN H
3789 W BARBER LN
ROBSTOWN TX 78380-5868

MESSER , JODY
9839 DAISY DR
CORPUS CHRISTI TX 78410-1701

MESSER , KENDALL
9839 DAISY DR
CORPUS CHRISTI TX 78410-1701

MIKULEC , LORI M
7316 COUNTY ROAD 2045
ODEM TX 78370-4163

MILLER , ARON
10605 VEDA DR
CORPUS CHRISTI TX 78410-2309

MILLER , PATTY
10670 OUTPOST DR
CORPUS CHRISTI TX 78410-2126

MILLS , ALIS
3633 COUNTY ROAD 52B
ROBSTOWN TX 78380-5938

MIRELES , CATHARENA LEERAE
1742 CORONADO TRL
CORPUS CHRISTI TX 78410-1858

MOCK , MR JOSHUA
3801 AMANDA LN
ROBSTOWN TX 78380-2059

MOCZYGEMBA , MARGOT
6105 JESSICA DR
CORPUS CHRISTI TX 78414-3682

MOLINA , MR JESUS S
4314 LEONARD DR
CORPUS CHRISTI TX 78410-2820

MONTGOMERY , LINDSAY
3602 LAKE PALESTINE
ROBSTOWN TX 78380-6144

MORALES , CALEB RAY
645 W LIGUSTRUM BLVD
ROBSTOWN TX 78380-2525

MORALES , JIMMY
645 W LIGUSTRUM BLVD
ROBSTOWN TX 78380-2525

MORALES , MRS LORRAINE
645 W LIGUSTRUM BLVD
ROBSTOWN TX 78380-2525

MORALES , MAEGAN
645 W LIGUSTRUM BLVD
ROBSTOWN TX 78380-2525

MORGAN , ASHLEY
9620 HUNTINGTON DR
CORPUS CHRISTI TX 78410-1517

MORGAN , T
APT 5
13661 TEAGUE LN
CORPUS CHRISTI TX 78410-5239

MORIN , ALVIN
4537 FM 1889
ROBSTOWN TX 78380-2025

MORIN , ANDREW
3670 JACK DR
ROBSTOWN TX 78380-5846

MORIN , ARNOLD
ARNOLD MORIN
3676 INCA ST
ROBSTOWN TX 78380-5803

MORIN , ARSILIA
PO BOX 261167
CORPUS CHRISTI TX 78426-1167

MORIN , ARSILIA
3670 JACK DR
ROBSTOWN TX 78380-5846

MORIN , YOLANDA
4537 FM 1889
ROBSTOWN TX 78380-2025

MOTA GARZA , MRS LEEANN
826 CHAPA ST
ROBSTOWN TX 78380-2129

MUENSTER , MARK
1015 LUXOR DR
CORPUS CHRISTI TX 78412-3805

MULLENIX , THOMAS
14629 SWEET WATER CREEK DR
CORPUS CHRISTI TX 78410-5637

MURPHY , ELLEN
5382 RIVER TRAIL DR
ROBSTOWN TX 78380-5811

NARANJO , JEANETTE
327 W ELLA AVE
KINGSVILLE TX 78363-4469

NATAS , REFICUL
999 COUNTY ROAD 999
ROBSTOWN TX 78380

NAVARRETE , DEMI
6053 COUNTY ROAD 99
SANDIA TX 78383-5701

NELSON , CHRISTINA
4333 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5682

NISBET , JULIETTE
6077 HIGH BLUFF CIR
SANDIA TX 78383-5613

NOAKES , MRS CALLIE
11230 BRENDEL LN
CORPUS CHRISTI TX 78410-3141

OLIVIERA , ALEXA
4217 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5642

OLSZEWSKI , KIMBERLY GRAVES
3979 SADDLE TRL
ROBSTOWN TX 78380-6051

ORDWAY , ASHLEY
4314 CLEAR FORK CT
CORPUS CHRISTI TX 78410-5602

ORONA , MRS KAYLA M
806 E AVENUE B
ROBSTOWN TX 78380-3112

ORTIZ , JULIANNA
APT 06B
7218 S PADRE ISLAND DR
CORPUS CHRISTI TX 78412-4332

ORTIZ JR , MR SOLOMON
PO BOX 286
CORPUS CHRISTI TX 78403-0286

OSBORNE , LESA
2574 COUNTY ROAD 28
ROBSTOWN TX 78380-6154

OTAHAL , DENISE HOFF
5093 COUNTY ROAD 79
ROBSTOWN TX 78380-5348

OTAHAL , KATHY
4310 PECAN BAYOU CT
CORPUS CHRISTI TX 78410-5617

OTERO , ROSALINDA
607 WRIGHT ST
ROBSTOWN TX 78380-3815

PAINE , BETTY
5927 BRYANT POND DR
HOUSTON TX 77041-5802

PANTOJA , JENNIFER
15303 HARBOR LNDG
VON ORMY TX 78073-3873

PAEDEZ , APOLONIA
113 MAGEE LN
ROBSTOWN TX 78380-2022

PAEDEZ , MRS ASHLEY
3765 AMANDA LN
ROBSTOWN TX 78380-2026

PAEDEZ , ESTER MARIA
113 MAGEE LN
ROBSTOWN TX 78380-2022

PAEDEZ JR , MR POLO
13733 RIVER CANYON DR
CORPUS CHRISTI TX 78410-5227

PAREDEZ , TARA
13733 RIVER CANYON DR
CORPUS CHRISTI TX 78410-5227

PARKINSON , BLANCA
10801 SILVERTON DR
CORPUS CHRISTI TX 78410-2233

PAULISON , BOB
15226 BARATARIA DR
CORPUS CHRISTI TX 78418-6163

PAVLICEK , BRITANIE
14805 MELEX DR
CORPUS CHRISTI TX 78410-5547

PEACOCK , MS MAGGIE
APT 3201
1773 ENNIS JOSLIN RD
CORPUS CHRISTI TX 78412-4066

PENA , MS DOROTHY
2114 MEADOWPASS DR
CORPUS CHRISTI TX 78414-2605

PENROD , MARK
3806 COUNTY ROAD 69
ROBSTOWN TX 78380-5601

PEREZ , CHRISTOPHER
5134 SIESTA LOOP
ROBSTOWN TX 78380-5869

PEREZ , GERALD
3734 AMANDA LN
ROBSTOWN TX 78380-2026

PEREZ , MONICA
3734 AMANDA LN
ROBSTOWN TX 78380-2026

PEREZ , RICHARD
807 E AVENUE C
ROBSTOWN TX 78380-3116

PEREZ III , MR RICHARD
807 E AVENUE C
ROBSTOWN TX 78380-3116

PEREZ , SAN JUANITA
103 JEWITT DR
ROBSTOWN TX 78380-2006

PEREZ , STEFANIE
200 RETAMA DR
ROBSTOWN TX 78380-2015

PERKINS , JULIE E
4009 LOMA ALTA RD
CORPUS CHRISTI TX 78410-4113

PERRIGUE , THOMAS
1846 FM 892
BISHOP TX 78343-5064

PERRIRAZ , BENNY & TRUDY LYNETTE
3782 W BARBER LN
ROBSTOWN TX 78380-5867

PERRIRAZ , BENNY
3782 W BARBER LN
ROBSTOWN TX 78380-5867

PERRIRAZ , TRUDY L
3782 W BARBER LN
ROBSTOWN TX 78380-5867

PETERS , DONNA
15325 GUADALUPE RIVER DR
CORPUS CHRISTI TX 78410-5739

PICHA JR , GEORGE F
4739 FM 1889
ROBSTOWN TX 78380-5807

PICHA , LAURA
5381 PARTRIDGE
ROBSTOWN TX 78380-2037

PICOZZI , MRS KIMBERLY
14923 PETRONILA CREEK CT
CORPUS CHRISTI TX 78410-5697

PIERCE , MR BRENDAN
3673 COUNTY ROAD 52B
ROBSTOWN TX 78380-5938

PILARCZYK , MRS CONNIE
3775 W BARBER LN
ROBSTOWN TX 78380-5868

PILARCZYK , MR PAUL
3775 W BARBER LN
ROBSTOWN TX 78380-5868

PINKERTON , MELISSA
5315 COUNTY ROAD 73
ROBSTOWN TX 78380-5892

PONCE-PERALES , STEPHANIE
4310 BIG CYPRUS BYU
CORPUS CHRISTI TX 78410-5799

POSEY , DR. DOUG
RIVERSIDE VETERINARY CLINIC
14446 NORTHWEST BLVD
CORPUS CHRISTI TX 78410-5508

POSEY , JOYE
15010 LAKE ATHENS AVE
ROBSTOWN TX 78380-2929

PRATER , JULIE
325 ROUNDABOUT LN
KERRVILLE TX 78028-8304

PRATER , MARTY
325 ROUNDABOUT LN
KERRVILLE TX 78028-8304

PREIS , DIANE & GEORGE
PO BOX 260658
CORPUS CHRISTI TX 78426-0658

PRUNEDA , ERNESTO
5433 COUNTY ROAD 79
ROBSTOWN TX 78380-6063

RAMIREZ , CINDY
4588 COUNTY ROAD 38
ROBSTOWN TX 78380-4512

RAMIREZ , ALEXIS
206 ASHBURN AVE
ROBSTOWN TX 78380-2213

RAMIREZ III , MR JUAN OLGUIN
805 MESQUITE LN
ROBSTOWN TX 78380-2140

RAMIREZ , LINDA
505 E AVENUE H
ROBSTOWN TX 78380-2731

RAMON , MARY
109 ASHBURN AVE
ROBSTOWN TX 78380-2210

RAMOS-AVILES , MS SOCORRO
APT 723
4901 SARATOGA BLVD
CORPUS CHRISTI TX 78413-2265

RAMSAY , ASHLEY
3721 LAKE MC QUEENEY CT
ROBSTOWN TX 78380-2931

RAMSEY , SCOTT
4832 FM 1889
ROBSTOWN TX 78380-5854

RANGEL , FRANCES
407 E AVENUE C
ROBSTOWN TX 78380-3036

RASMUSSEN , TANDI
6053 COUNTY ROAD 99
SANDIA TX 78383-5701

RATHKE , SANDRA L
15501 NORTHWEST BLVD
ROBSTOWN TX 78380-5928

REED , DR. ANITA
3206 WRANGLER ST
ROBSTOWN TX 78380-1359

REINHARD , ROBIN
14626 SPAULDING DR
CORP CHRISTI TX 78410-5515

REYNA , MARIGAIL
7210 AUBIE CT
CORPUS CHRISTI TX 78414-2797

RHODES , MARIA
217 IOWA ST
ROBSTOWN TX 78380-3702

RICE , MR CONOR B
714 ROBERT DR
CORPUS CHRISTI TX 78412-2944

RICHARD , JAMIE L
5570 FM 1833
ROBSTOWN TX 78380-5317

RICHARD , MATT
5570 FM 1833
ROBSTOWN TX 78380-5317

RICKS , KATHY
13656 TEAGUE LN
CORPUS CHRISTI TX 78410-5207

RILEY , HAILEY
15209 PECOS RIVER DR
CORPUS CHRISTI TX 78410-5719

RIVERA , JENNIFER
520 E AVENUE F
ROBSTOWN TX 78380-2720

ROBERTS , MAKAYLA
5105 SPRING BROOK DR
CORPUS CHRISTI TX 78413-5629

RODRIGUEZ , RICHARD
1118 BAUER RD
ROBSTOWN TX 78380-2408

RODRIGUEZ , AMANDA
501 E AVENUE H
ROBSTOWN TX 78380-2731

RODRIGUEZ , JOHNNY
501 E AVENUE H
ROBSTOWN TX 78380-2731

RODRIGUEZ , MARY
119 JEWITT DR
ROBSTOWN TX 78380-2006

RODRIGUEZ JR , MR RUBEN
119 JEWITT DR
ROBSTOWN TX 78380-2006

ROJAS , DIANE
APT 1821
640 S HIGHWAY 77
ROBSTOWN TX 78380-4518

ROKOHL , KATHY
3838 LEONARD DR
CORPUS CHRISTI TX 78410-2945

ROSALES , MADELLINE
709 W MAIN AVE
ROBSTOWN TX 78380-2818

ROSAS , DIANA
5510 W RIVERVIEW DR
ROBSTOWN TX 78380-9004

ROSAS , MS LORI
10909 BIRDWOOD LN
CORPUS CHRISTI TX 78410-2555

ROSENBERG , ABIGAIL
5345 AVENUE C
CORPUS CHRISTI TX 78410-4723

RUBIO , HORACIO
4664 FM 1889
ROBSTOWN TX 78380-2053

SALDANA , MICHAEL M
4969 BLUEBIRD ST
ROBSTOWN TX 78380-2029

SALINAS , ESPERANZA
4634 FM 1889
ROBSTOWN TX 78380-2053

SALINAS , MR LEOBERTO
4632 FM 1889
ROBSTOWN TX 78380-2053

SALINAS , SIERRA
645 HUISACHE ST
ROBSTOWN TX 78380-2523

SAMANIEGO , JOSHUA
3892 RACHAL LN
ROBSTOWN TX 78380-5296

SANTILLAN , BETHANY
3733 AMANDA LN
ROBSTOWN TX 78380-2026

SANTILLAN , MIGUEL
3733 AMANDA LN
ROBSTOWN TX 78380-2026

SANTOS , MARCY
205 MESA DR
ROBSTOWN TX 78380-2005

SCHANEN , DIANE
13626 VISTA CIR
CORPUS CHRISTI TX 78410-4827

SCHANEN , MR JAMES CRAY
13626 VISTA CIR
CORPUS CHRISTI TX 78410-4827

SCHAWA , MIRANDA
4774 FM 666
ROBSTOWN TX 78380-5530

SCHILTER , DR. GEORGE BRANDON
404 WESTWOOD DR
LEAGUE CITY TX 77573-7064

SCHIRO , BETTY
11924 CHAMIZAL ST
CORPUS CHRISTI TX 78410-3808

SCHROETER , BARBARA
3332 EMORY DR
CORPUS CHRISTI TX 78410-4334

SECRET , LYDIA C
405 E AVENUE I
ROBSTOWN TX 78380-2322

SERBANTEZ , MR ANGEL
2537 DWYER DR
CORPUS CHRISTI TX 78410-1844

SERRATA , JESSICA MARIE
846 MESQUITE LN
ROBSTOWN TX 78380-2141

SHARPLESS , MRS VICTORIA
4229 COWHOUSE CREEK CT
CORPUS CHRISTI TX 78410-5610

SHEPARD , ADRIENNE
11513 S CREEK DR
CORPUS CHRISTI TX 78410-3272

SHOWS , ANDREW
4150 LONE OAK DR
ROBSTOWN TX 78380-5853

SHOWS , MARY
4476 COUNTY ROAD 56
ROBSTOWN TX 78380-9300

SHOWS , SHANNON
4150 LONE OAK DR
ROBSTOWN TX 78380-5853

SHURLEY , JUDY
12934 MCBURNETT DR
CORPUS CHRISTI TX 78410-4312

SIGALA , KIMBERLY
327 W ELLA AVE
KINGSVILLE TX 78363-4469

SIJANSKY , EDITH J
3706 SHOAL CREEK CIR
CORPUS CHRISTI TX 78410-3201

SILGUERO , LORRAINE ANN
APT#8
403 N 1ST ST
ROBSTOWN TX 78380-2938

SILVA , ELIZABETH
325 KISSLING AVE
ROBSTOWN TX 78380-2222

SIMMONS , KADIE KAY
5326 RIVER TRAIL DR
ROBSTOWN TX 78380-5811

SIMMONS , STEFANIE
5326 RIVER TRAIL DR
ROBSTOWN TX 78380-5811

SIMS , ROSE
4113 RAPIDS DR
CORPUS CHRISTI TX 78410-5701

SINGLETERRY , DOLORES
126 W LIGUSTRUM BLVD
ROBSTOWN TX 78380-2634

SMITH , LILLY C
PO BOX 423
ROBSTOWN TX 78380-0423

SMITH , PAMELA JOYCE
3988 SADDLE TRL
ROBSTOWN TX 78380-6062

SOLORIO , ALEXIS DENIELLE
PO BOX 181
BANQUETE TX 78339-0181

STANTON , RANDY
6178 N SANDY HOLLOW DR
SANDIA TX 78383-5699

STCLAIR , LINDA
3992 FM 1694
ROBSTOWN TX 78380-5652

STORM , KACIE
14814 SANTA GERTRUDIS DR
CORPUS CHRISTI TX 78410-5808

STUDER , ALBERT LEE
5233 BONNER DR
CORPUS CHRISTI TX 78411-4601

STUDER , MS ALMA MARIE
5433 COUNTY ROAD 79
ROBSTOWN TX 78380-6063

STUDER , MONICA
5233 BONNER DR
CORPUS CHRISTI TX 78411-4601

STURGIS , KIMBERLY
613 WRIGHT ST
ROBSTOWN TX 78380-3815

SUAREZ , RACHEL
4601 CALAVERAS DR
CORPUS CHRISTI TX 78410-5688

SULLIVAN , AMANDA
6134 SAN RAMON DR
CORPUS CHRISTI TX 78413-2919

SWAN , SHERRI
APACHE INDUSTRIAL SERVICES
4565 TEAL DR
CORPUS CHRISTI TX 78410-5816

SWETLICK , MRS CONNIE
120 CENESIA
SANDIA TX 78383-4053

SYKORA , MANDILEA
3945 MOLLIE LN
ROBSTOWN TX 78380-5814

TAYLOR , JOSHUA
11937 YELLOW OAK AVE
CORPUS CHRISTI TX 78410-6050

THOMAS , MR LOSS E
PO BOX 10407
CORPUS CHRISTI TX 78460-0407

TILLER , JOANNE
PO BOX 335
LA VERNIA TX 78121-0335

TLEIMAT , MS JACQUELYN
641 HOFFMAN ST
CORPUS CHRISTI TX 78404-2616

TOEPFER , BUDDY
4030 RIVER WALK DR
CORPUS CHRISTI TX 78410-5741

TORRES SR , MR EUSEBIO C
3661 WREN ST
ROBSTOWN TX 78380-5847

TORREZ , ODILIA G
116 JEWITT DR
ROBSTOWN TX 78380-2003

TREJO CHAVEZ , ALINE
1035 WILSHIRE PL
CORPUS CHRISTI TX 78411-2326

TREVI , SHIR
15042 LAKE ATHENS AVE
ROBSTOWN TX 78380-2929

TREVINO , JOE
846 MESQUITE LN
ROBSTOWN TX 78380-2141

TREVINO , MR FELIX
3972 COUNTY ROAD 44
ROBSTOWN TX 78380-9423

TREVINO , MARIBEL
3671 JACK DR
ROBSTOWN TX 78380-5845

TREVINO , OSCAR
3671 JACK DR
ROBSTOWN TX 78380-5845

TREVINO , TINA
14722 SANTA GERTRUDIS DR
CORPUS CHRISTI TX 78410-5800

TRUAX , CHRIS
4658 COUNTY ROAD 73
ROBSTOWN TX 78380-5212

TYLER , BENJAMIN
4085 EMIL ST
ROBSTOWN TX 78380-6054

VALENZUELA , CHRISTINE
219 RETAMA DR
ROBSTOWN TX 78380-2045

VALENZUELA , MARISSA
219 RETAMA DR
ROBSTOWN TX 78380-2045

VALENZUELA , RAQUEL
APT 5201
1825 BILLY G WEBB
PORTLAND TX 78374-3709

VALLE , KASI
419 JACKSON AVE
ROBSTOWN TX 78380-3622

VALLEJO , MRS GRACIE
3410 COUNTY ROAD 36
ROBSTOWN TX 78380-6147

VALLEJO , MS RAE LYNN
453 W AVENUE G
ROBSTOWN TX 78380-2617

VAN LOO , ALISHA
APT D79
5502 SARATOGA BLVD
CORPUS CHRISTI TX 78413-2948

VANDERSLICE , MARY LOUISE
4024 RIDGE TRL
ROBSTOWN TX 78380-6020

VASQUEZ , ARIEL
9330 MOON LIGHT DR
CORPUS CHRISTI TX 78409-2628

VASQUEZ , MELINDA
112 JEWITT DR
ROBSTOWN TX 78380-2003

VAUGHAN , MRS KAREN R
3627 COUNTY ROAD 52B
ROBSTOWN TX 78380-5938

VAUGHAN , MRS KAREN R
PO BOX 260545
CORPUS CHRISTI TX 78426-0545

VEJAR , MICHAEL
4302 WORDSWORTH CRK
CORPUS CHRISTI TX 78410-5755

VELA , BRIDGETT
5354 RIVERVIEW DR
ROBSTOWN TX 78380-5879

VELA , JOHANNA
PO BOX 85
BANQUETE TX 78339-0085

VELA JR , RUBEN
434 W AVENUE D
ROBSTOWN TX 78380-2924

VELASCO , AHLIX
898 E AVENUE D
ROBSTOWN TX 78380-3123

VEST , JUDY
4146 LONE OAK DR
ROBSTOWN TX 78380-5853

VIGUE , ANTHONY
608 WASHINGTON AVE
ROBSTOWN TX 78380-3730

VILLARREAL , CHLOE
4029 BOBWHITE
ROBSTOWN TX 78380-6056

VILLARREAL , JOE
4029 BOBWHITE
ROBSTOWN TX 78380-6056

VILLARREAL , MISTY
4029 BOBWHITE
ROBSTOWN TX 78380-6056

VILLARREAL , DIXIE
14817 COLUMBIA RIVER DR
CORPUS CHRISTI TX 78410-5550

WALTER , CAROLYN
5430 RIVERVIEW DR
ROBSTOWN TX 78380-5880

WALZ , MRS TIM
SUITE 119-B
4226 SPRING CREEK DR
CORPUS CHRISTI TX 78410-5654

WALZ , MARGARET A
4226 SPRING CREEK DR
CORPUS CHRISTI TX 78410-5654

WANGEN GUTIERREZ , HEIDI
6453 EASLEY LN
SANDIA TX 78383-9619

WATKINS , AMBER
10526 HORSESHOE DR
CORPUS CHRISTI TX 78410-2110

WAYLON , EMMA
15411 BASSWOOD DR
CORPUS CHRISTI TX 78410-5788

WEBER , JOHN STEPHEN
609 NAPLES ST
CORPUS CHRISTI TX 78404-2911

WHITEAKER , MRS CAROLYN
3601 SILVER LAKE CT
ROBSTOWN TX 78380-6190

WILLEDEN , MRS BLESSING
14942 SANTA GERTRUDIS DR
CORPUS CHRISTI TX 78410-5822

WILLIAMS , WILLIAM C
4101 CROSS RIVER DR
CORPUS CHRISTI TX 78410-5769

WILLIAMS , SARA
3959 MONTA DR
ROBSTOWN TX 78380-5893

WILLIAMS , SHARON KAY
4101 CROSS RIVER DR
CORPUS CHRISTI TX 78410-5769

WILLIAMSON , DONNA
14833 SANTA GERTRUDIS DR
CORPUS CHRISTI TX 78410-5805

WILSON , MR DAVID
4085 BALLARD LN
ROBSTOWN TX 78380-5905

WILSON , JANEL
5419 COUNTY ROAD 73A
ROBSTOWN TX 78380-6027

WILSON , VICKIE
4085 BALLARD LN
ROBSTOWN TX 78380-5905

WINCHESTER , MACY
5477 LONESOME DOVE
ROBSTOWN TX 78380-5498

WINCHESTER , MALLORY
5477 LONESOME DOVE
ROBSTOWN TX 78380-5498

WINCHESTER , SABRINA
5477 LONESOME DOVE
ROBSTOWN TX 78380-5498

WOLLMANN , FRED
4169 BOBWHITE
ROBSTOWN TX 78380-6052

WOMACK , ORALIA
3760 W BARBER LN
ROBSTOWN TX 78380-5867

YATES , HOWARD
4581 TEAL DR
CORPUS CHRISTI TX 78410-5816

YATES , TERESA
4581 TEAL DR
CORPUS CHRISTI TX 78410-5816

YEPEZ III , DAVID
4519 FM 1694
ROBSTOWN TX 78380-5994

YOUNGBLOOD III , MR FRANCIS EUGENE
PO BOX 260275
CORPUS CHRISTI TX 78426-0275

YOUNGER , MRS SAMANTHA
5505 LONESOME DOVE
ROBSTOWN TX 78380-5393

ZAMARRIPA , IDA D
3550 COUNTY ROAD 48
ROBSTOWN TX 78380-5824

ZAMORA , DANIEL
3638 COUNTY ROAD 52B
ROBSTOWN TX 78380-5937

ZAMORA , MELISSA
454 LOUISIANA AVE
CORPUS CHRISTI TX 78404-1708

ZARATE , CAMERON
419 JACKSON AVE
ROBSTOWN TX 78380-3622

ZURICK , JENNIFER
15401 BEDROCK DR
CORPUS CHRISTI TX 78410-5745

ZURICK , TRAVIS J
15401 BEDROCK DR
CORPUS CHRISTI TX 78410-5745

ZURICK , ELIZABETH
4339 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5682

ZURICK , MARTIN
4339 WOOD RIVER DR
CORPUS CHRISTI TX 78410-5682

TCEQ AIR QUALITY PERMIT NUMBER 174951

APPLICATION BY	§	BEFORE THE
NUECES GREEN AMMONIA LLC	§	TEXAS COMMISSION ON
NUECES GREEN AMMONIA PLANT	§	ENVIRONMENTAL QUALITY
ROBSTOWN, NUECES 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. The Office of Chief Clerk received timely comments from the following persons: Karl K Adami, Michael Adams, Myra B Alaniz, Samuel Y Alaniz, Janie Aleman, Jim Morgan, Katherine Allsup, Esperanza Alonzo, Felix Alonzo, Beatriz Alvarado, Nancy Alvarado, Ivan Alvarez, Kimberly Amy, Clifford Anderson, Danika Anderwald, Isabel Araiza Ortiz, Shannon Arevalo, Sandra A Arizmendi, Tommie Sue Arnold, Estaban Arredondo, Vicente J Arriaga, David Avalos, Letisia Avalos, Ray Bailey, Charles Bailie, Donald Bailie, Sarah Bailie, Rebecca Ballard, Mary Najvar Barbee, Jarrett Barber, Jennie Barber, Judy Lynn Barber, Leslie Barber, Emily Barrera, Candace Barrios, Eduardo Beltran, Melissa Beltran, Cody Benavides, Gloria Berger, Mark Berger, Kandyce Bergman, Tanya Bergstrom, Rowdy Bergstrom, Mona Lisa Biberstein, Glenn Ann Bickham, Harold Blair, Marlena Boatwright, Elizabeth Boazman, Blake Bocan, Charles Bockholt, Elaine S Bockholt, Holly Bockholt, Jared Bockholt, Cordelia Bosquez, Kathleen Bowers, Karen Bravenec, Amanda Breland, Doyle Lloyd Brooks, Roger S Brooks, Sylvia Buentello, Katherine Bull, Megan Bull, Ryan David Bull, Sharon Burck, Gary Burney, Carol Burney, Sister Patricia Burns, Dalia L Burton, Sharon Bush, James Gary Byrd, Karen Byrd, Rachel Caballero, John R Callaway, Patty Marie Callaway, Laura Camarena, Sylvia Campos, Vanessa Cantu, Gary Capeheart, Sharon Capeheart, Amanda Caro, Melinda Carrasco, Phyllis Carrier, Kelley Jo Carrillo, John Cole Carrillo, John Edward Carrillo, Elisabeth Castaneda, Kimberly Castaneda, Michael Castaneda, Norma Castaneda, Elida I Castillo, Adelita Cavada, Rose Cavazos, Sonja Cedillo, Audrey Cervantes, Matt Chapman, Jean Chapman, Karl H Charba, Rosie Chavez, Cynthia Ann Cleavelin, Debbie Cleveland, Michael Cleveland, Rachel Clowdus, Malena Dawn Cocran, Haley Coleman, Dich Coles, Concerned Citizen, Anita Contreras, Deeanna Contreras, Pablo Contreras, Louise Cook, Robert Cook, Carlos S Costilla, Bette Cranford, Cindy Cravey, Taylor Cravey, Lori Crisp, Marcus Crisp, Crittenden, Crittenden, Ruth L Crook, Yolanda Cruz, Chris Cuellar, Mike Culbertson, Dawn Cunningham, Clint Cunningham, Sandra Davis, Amanda Davis, Andrea Kiarra De Los Santos, Marty De Los Santos, Liza De Los Santos, Jerimey Dear, Laurinda Dear, Tina G Del Gallo, Ayelet Deluna, Dennis L Denman, Sheri Denman, Robert Dennis, Sara Dennis, Diane Diane Baker, Victor Digesti, Angela Dixon, Jessalyn Dixon, Sister Eileen Doherty, David M Donald, Deborah Donald, Brittany Donald, Deborah M Donald, Beverley S Douglass, Andrea Driver, Melissa M Ducote, Janie Dugger, Bruce Dugger, Tommy Dunlavy, Alicia Kay Dunn, Sarah Duran, Elliott Dziuk, Mireille Dziuk, Mackenzie E, Deborah Kocurek Eckel, April Eddlemon, Cassie Edwards, Jessica Elam, Patricia Eley,

Christinna Elizondo, Jeanessa Escamilla, Gilberto Espinoza, Roxanna Espinoza, Del Essig, Maria Louisa Evans, Phillip Evans, Bobbie Evans, Laramie Fain, Alan Flores, Pete Flores, John E Foddrill, Darci D Forrest, Paisley Forrest, Thomas Forrest, James Fortner, Dottie Fortner, Allison Fought, Javier O Franco, Brianna Franco, Greg Frederick, Karen Frederick, Kim Frost, Larry Fuhrken, Cathy Fulton, Suzanne Gallagher, Amanda Galvan, Marissa Gamboa, Candace Garcia, Juan S Garcia, Santiago Garcia, Alexis Garcia, Ashley R Garcia, Bobby Garcia, Hannah Garcia, Jason Garcia, Maria E Garcia, Rachel Garcia, Tanya Angely Garcia, April Garza, Sara Garza, Caren Gavlik, Barbara Geis, Wendy Genz, Joshua Lee George, Shelby Gillihan, Frank Gomez, Omar Gomez, Laura Gomez, Sonia Gomez, Candace D Gonzales, Irma Gonzalez, Arnoldo Gonzalez, Cristel Gonzalez, Floyd Gonzalez, Fred Gonzalez, Jose Gonzalez, Jennifer Gracia, Kimberlie Kaye Graley, Melanie Grant, Ralph Green, Cheryl Green, Ralph Green, Michelle Guajardo, Allison Guerra, Veronica Guerra, Aaron Gutierrez, Lela Gutierrez, Mercedes Gutierrez, Miguel Gutierrez, David Guzman, Suzanne Haas, Mckenzie Hahn, Maria Cristina Halberdier, Jason R Hale, Kenneth Wayne Hanke, Lisa Bockholt Hanke, Nhu Hankins, Beth Hartman, Mike W Harvey, Tracie Hatch, Ronald T Hellberg, Silvia G Henderson, Autumn Hensiek-Fain, Angela Hernandez, Emily Hernandez, Fernando Hernandez, Judy Hernandez, Laura Hernandez, Leslie Hernandez, P Hernandez, Robert G Hernandez, Yolanda Hernandez, Richard Hernandez, Abel Herrero, Matilda Herrero, Mariann Herrington, Gwen Higerd, Bobby Hinds, Sheryl Hines, Art Hinojosa, Juan "Chuy" Hinojosa, Chelsea Hodges, Bruce K Hoelscher, Klint Hoelscher, Michele Hoelscher, Penny Hoelscher, Deborah Holloway, Marybeth Horne, Andres Huerta, Laura Huerta, Jeanette Hughes, M Hughson, Melissa Hughson, Jeffrey Hunt, Kathleen Hurst, Reagan Ivey, Jerry Jernigan, Betty Jernigan, Leticia Jimenez, Linda Johnson, Mary Louise Johnson, Dennis Craig Jones, Patricia Taber Jones, Rumaldo Z Juarez, Matteson Kapa, Steve Kapa, Don Keiper, Adrienne Kerr, Judy Kestner, Janice Kimball, Matthew L Kimmel, Terri Kimmel, Richard C King, Alexis King, Kevin King, Joshua Kirkland, Monica R Kirkland, Cassaundra Klawinsky, Coastal Bend Sierra Club (James E Klein), Patricia Kocurek, Rhonda K Koenning, Joe Koniakowsky, Renee Kozak, Gaylon Krizak, Jeanette Krizak, Colleen Ann Krizak, Jeanette Allen Krizak, Ingrid Isabelle Lahaye, Ty Laner, Ruby Ann Lara, Ryan Lawhon, Marcia Layton, Stephany Leal, Darlene Lee, Leanne Lhironnelle, Randy Light, Alice T Ligon, Jennifer Marie Littlejohn, Jane Longoria, Sam Longoria, Melissa H Longoria, Norma Longoria, Tarah Longoria, Rick Longueira, Sara Lopez, Daniel Lopez, Edwin Lopez, Rocky Lorenz, Marie Lucio, Amy Luna, Miranda Luna, Susie Luna-Saldana, Monna Lytle, Randy M, Cheryl Majek, James R Malek, Melinda Malone, Curtis Manning, Edward John Marez, Maryann Markert, Joanne Marquez, Alexander Marroquin, Angela Marroquin, Emma Martinez, Gabriella Martinez, Ginger Martinez, Juan Martinez, Raymond Martinez, Rebecca Martinez, Bianca Martinez, Patti Mathisen, Bob Matthews, James McCain, Christine Mccloy, Doris Mcdermott, Korina Mcgraw, Bill Mcgregor, Eli Mckay, David Everett Mckesson, John Mcknight, Lauren Mcnabb, Ryan W Mcnabb, Elizabeth Mcvay, Allen Menn, Braden Menn, Rebecca Menn, David Merritt, Glen H Merritt, Jody Messer, Kendall Messer, Lori M Mikulec, Aron Miller, Patty Miller, Alis Mills, Catharena Leerae Mireles, Joshua Mock, Margot Moczygemba, Jesus S Molina, Lindsay Montgomery, Caleb Ray Morales, Jimmy Morales, Lorraine Morales, Maegan Morales, Ashley Morgan, T Morgan, Alvin Morin, Andrew Morin, Arnold Morin, Arsilia Morin, Yolanda Morin, Leeann Mota Garza, Mark Muenster, Thomas Mullenix, Ellen Murphy, Jeanette Naranjo, Reficul Natas, Demi Navarrete, Christina Nelson, Juliette Nisbet, Callie Noakes, Alexa Oliviera, Kimberly Graves Olszewski, Ashley Ordway, Kayla M Orona, Julianna Ortiz, Solomon Ortiz, Lesa Osborne, Denise Hoff Otahal, Kathy

Otahal, Rosalinda Otero, Betty Paine, Jennifer Pantoja, Ashley Paredez, Ester Maria Paredez, Polo Paredez, Tara Paredez, Blanca Parkinson, Britanie Pavlicek, Maggie Peacock, Dorothy Pena, Mark Penrod, Christopher Perez, Gerald Perez, Monica Perez, Richard Perez, San Juanita Perez, Stefanie Perez, Julie E Perkins, Thomas Perrigue, Benny Perriraz, Trudy L Perriraz, Trudy Lynette Perriraz, Donna Peters, George F Picha, Laura Picha, Kimberly Picozzi, Brendan Pierce, Connie Pilarczyk, Paul Pilarczyk, Melissa Pinkerton, Stephanie Ponce-Perales, Doug Posey, Joye Posey, Julie Prater, Marty Prater, Ernesto Pruneda, Alexis Ramirez, Juan Olguin Ramirez, Linda Ramirez, Mary Ramon, Socorro Ramos-Aviles, Ashley Ramsay, Scott Ramsey, Tandi Rasmussen, Sandra L Rathke, Anita Reed, Robin Reinhard, Marigail Reyna, Maria Rhodes, Conor B Rice, Jamie L Richard, Matt Richard, Kathy Ricks, Hailey Riley, Jennifer Rivera, Makayla Roberts, Richard Rodriguez, Amanda Rodriguez, Johnny Rodriguez, Mary Rodriguez, Ruben Rodriguez, Diane Rojas, Kathy Rokohl, Madelline Rosales, Diana Rosas, Lori Rosas, Abigail Rosenberg, Horacio Rubio, Michael M Saldana, Esperanza Salinas, Leoberto Salinas, Sierra Salinas, Joshua Samaniego, Bethany Santillan, Miguel Santillan, Diane Schanen, James Cray Schanen, Miranda Schawe, George Brandon Schilter, Betty Schiro, Barbara Schroeter, Lydia C Secrest, Angel Serbantez, Victoria Sharpless, Adrienne Shephard, Andrew Shows, Mary Shows, Shannon Shows, Judy Shurley, Kimberly Sigala, Edith J Sijansky, Lorraine Ann Silguero, Elizabeth Silva, Kadie Kay Simmons, Stefanie Simmons, Rose Sims, Lilly C Smith, Pamela Joyce Smith, Alexis Denielle Solorio, Randy Stanton, Linda Stclair, Kacie Storm, Albert Lee Studer, Alma Marie Studer, Monica Studer, Kimberly Sturgis, Rachel Suarez, Amanda Sullivan, Sherri Swan, Connie Swetlick, Mandilea Sykora, Joshua Taylor, Loss E Thomas, Joanne Tiller, Jacquelyn Tleimat, Buddy Toepfer, Eusebio C Torres, Odilia G Torrez, Aline Trejo Chavez, Shir Trevi, Joe Trevino, Felix Trevino, Maribel Trevino, Oscar Trevino, Tina Trevino, Chris Truax, Benjamin Tyler, Christine Valenzuela, Marissa Valenzuela, Raquel Valenzuela, Kasi Valle, Gracie Vallejo, Raelynn Vallejo, Alisha Van Loo, Mary Louise Vanderslice, Ariel Vasquez, Melinda Vasquez, Karen R Vaughan, Michael Vejar, Bridgett Vela, Johanna Vela, Ruben Vela, Ahlix Velasco, Judy Vest, Anthony Vigue, Chloe Villarreal, Joe Villarreal, Misty Villarreal, Dixie Villarreal, Carolyn Walter, Tim Walz, Margaret A Walz, Heidi Wangen Gutierrez, Amber Watkins, Emma Waylon, John Stephen Weber, Carolyn Whiteaker, Blessing Willesden, Sara Williams, Sharon Kay Williams, Donna Williamson, David Wilson, Janel Wilson, Vickie Wilson, Macy Winchester, Mallory Winchester, Sabrina Winchester, Fred Wollmann, Oralía Womack, Howard Yates, Teresa Yates, David Yepez, Francis Eugene Youngblood, Samantha Younger, Ida D Zamarripa, Melissa Zamora, Cameron Zarate, Jennifer Zurick, Travis J Zurick, Elizabeth Zurick, Martin Zurick. 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 TCEQ Public Education Program at 1-800-687-4040. General information about TCEQ can be found at our website at www.tceq.texas.gov.

BACKGROUND

Description of Facility

Nueces Green Ammonia LLC (Applicant) has applied to 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 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, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, and sulfur dioxide.

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 Number 174951.

The permit 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 (first public notice) for this permit 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 Grupero News*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on July 1, 2024, in English in the *Corpus Christi Caller Times* and in Spanish in *Tejano y Grupero News*. A public meeting was held on July 29, 2024 in Robstown. The notice of public meeting was published in English and Spanish on July 1, 2024, in the *Corpus Christi Caller Times* and *Tejano y Grupero News* respectively. The public comment period ended on July 31, 2024. 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

Commenters are concerned about 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 expressed concern that the proposed project would contribute to asthma, allergies, respiratory problems, skin and eye irritation, diabetes, pneumonia, high blood pressure, cancer, and bronchitis. Commenters worried about health effects from ammonia. Commenters expressed concern about cumulative effects of nearby facilities, background concentrations of pollution, and Saharan Dust.

(Bruce K Hoelscher, Caleb Ray Morales, Marybeth Horne, Callie Noakes, Richard Perez, Maria Cristina Halberdier, Kacie Storm, Gaylon Krizak, Jeanette Krizak, Jennie Barber, Polo Paredez, Teresa Yates, Deborah M Donald, Myra B Alaniz, Frank Gomez, Omar Gomez, Loss E Thomas, Elizabeth Zurick, Juan S Garcia, Ralph Green, Mercedes Gutierrez, Trudy Perriraz, Benny Perriraz, Bette Cranford, Ernesto Pruneda, Rachel Clowdus, Heidi Wangen Gutierrez, Arsilia Morin, Cassie Edwards, Fred Wollmann, Marissa Valenzuela, Glen H Merritt, Lesa Osborne, Buddy Toepfer, Melissa Zamora, Abel Herrero, Autumn Hensiek-Fain, Janie Dugger, Bruce Dugger, Juliette Nisbet, Deborah Donald, Dennis L Denman, Lisa Bockholt Hanke, Miranda Luna, Suzanne Gallagher, Macy Winchester, Yolanda Morin, Diane Schanen, Mireille Dziuk, Fernando Hernandez, Myra B Alaniz, Jerimey Dear, Martin Zurick, Penny Hoelscher, John Edward Carrillo, Arsilia Morin, Bruce K Hoelscher, Mary Louise Johnson, Carlos S Costilla, Laura Picha, Shannon Shows, Eusebio C Torres, Elida I Castillo, Trudy L Perriraz, Rebecca Menn, Kathy Rokohl, Myra B Alaniz, Cathy Fulton, Shannon Shows, Lorraine Ann Silguero, Marcia Layton, Larry Fuhrken, Holly Bockholt, Blake Bocan, Mary Ramon, Odilia G Torrez, Andres Huerta, Amanda Rodriguez, David M Donald, Laurinda Dear, Sherri Swan, Karen R Vaughan, Marie Lucio, Amanda Galvan, Andrew Shows, Candace Garcia, Michael Cleveland, Brendan Pierce, Mireille Dziuk, Bette Cranford, David Avalos, Holly Bockholt, Audrey Cervantes, Kathy Ricks, Chelsea Hodges, Joshua Kirkland, Alma Marie Studer, Patricia Kocurek, Steve Kapa, Bethany Santillan, Mona Lisa Biberstein, Sonia Gomez, Tanya Angely Garcia, Monna Lytle, Andrea Driver, Connie Pilarczyk, Joe Trevino, Victor Digesti, Terri Kimmel, Laramie Fain, Cody Benavides, Linda Ramirez, Jennifer Gracia, Phillip Evans, Clifford Anderson, Alvin Morin, Jacquelyn Tleimat, Amy Luna, Reficul Natas, Marcus Crisp, Pamela Joyce Smith, Chris Cuellar, Cheryl Majek, Alvin Morin, Karen Bravenec, Floyd Gonzalez, Phyllis Carrier, Eli Mckay, Ryan W McNabb, Sharon Capeheart, Patricia Taber Jones, Donald Bailie, Miguel Santillan, Tim Walz, Michael Castaneda, Diana Rosas, Paul Pilarczyk, T Morgan, Lindsay Montgomery, Karen R Vaughan, Rhonda K Koenning, Benny Perriraz, Rosalinda Otero, Sarah Bailie, Melissa Hughson, Thomas Mullenix, Laura Huerta, Suzanne Gallagher, Rose Cavazos, Melinda Vasquez, Rebecca Martinez, Rachel Caballero, Mike W Harvey, Melissa Hughson, Ida D Zamarripa, Denise Hoff Otahal, Andrea Kiarra De Los Santos, Amanda Rodriguez, Julie Prater, George F Picha, Maegan Morales, Rachel Caballero, Randy Light, Arnold Morin, Sister Patricia Burns, Rowdy Bergstrom, Laura Gomez, Sister Eileen Doherty, Rachel Garcia, Ashley Morgan, Robert Dennis, Alexis King, James Gary Byrd, Jerry Jernigan, Betty Jernigan, Yolanda Hernandez, Kimberly Castaneda, Alisha Van Loo, Marie Lucio, Kimberly Amy, Bob Matthews, Angel Serbantez, Elizabeth Zurick, Raquel Valenzuela, Karl K Adami, Dixie Villarreal, Curtis Manning, Dawn Cunningham, Clint Cunningham, Judy Shurley, Haley Coleman, Denise Hoff Otahal, Miguel Gutierrez, Holly Bockholt, Tina Trevino, Brittany Donald, Eli Mckay, Connie Pilarczyk, Sam Longoria, Karen R Vaughan, Alexis King, Dennis L Denman, Richard Rodriguez, Johnny Rodriguez, Sandra A Arizmendi, Emma Waylon, Margaret A Walz, Lorraine Morales, Ellen Murphy, Robert G Hernandez, Demi Navarrete, Jane Longoria, Ester Maria Paredez, Cheryl Green, Edwin Lopez, Sharon Kay Williams, Doyle Lloyd Brooks, Bette Cranford, Autumn Hensiek-Fain, Tommy Dunlavy, Chelsea Hodges, Solomon Ortiz, Tina G Del Gallo, Joe Villarreal, Karl H Charba, Andrea Kiarra De Los Santos, David Yepez, April Garza, Richard C King, Lilly C Smith, Diane Diane Baker, Trudy L Perriraz, Greg Frederick, Beatriz Alvarado, Beth Hartman, Thomas Perrigue, Richard Hernandez, Jennifer Pantoja, Emma Martinez, Julianna Ortiz, Silvia G Henderson, Holly Bockholt, Mary Shows, Victoria Sharpless, Mike W Harvey, Abel Herrero, Anita Reed, Dennis Craig

Jones, Tracie Hatch, Laura Camarena, Connie Pilarczyk, Alicia Kay Dunn, Sonja Cedillo, Bruce K Hoelscher, Ralph Green, Mallory Winchester, John Cole Carrillo, Renee Kozak, Ingrid Isabelle Lahaye, Darlene Lee, Coastal Bend Sierra Club (James E Klein), Judy Lynn Barber, Alexis Ramirez, Abel Herrero, Jeanessa Escamilla, Jessica Elam, Nhu Hankins, Stephany Leal, Mandilea Sykora, Matt Chapman, Vanessa Cantu, Judy Vest, Brianna Franco, Benjamin Tyler, Raymond Martinez, Jessalyn Dixon, Kelley Jo Carrillo, Bobby Garcia, Sandra A Arizmendi, Crittenden, Crittenden, Ray Bailey, Juan Martinez, Reagan Ivey, Lela Gutierrez, Marlena Boatwright, Kimberly Picozzi, Don Keiper, Allison Guerra, Oralia Womack, Patti Mathisen, Kadie Kay Simmons, Amanda Sullivan, Elizabeth Mcvay, Ginger Martinez, Alexis Garcia, Trudy L Perriraz, Elizabeth Zurick, Angela Hernandez, Jason R Hale, Randy Stanton, Deborah Donald, Rachel Suarez, Kenneth Wayne Hanke, Norma Longoria, Felix Trevino, Albert Lee Studer, Amanda Caro, Gwen Higerd, Sabrina Winchester, Bette Cranford, David Merritt, Linda Johnson, Roxanna Espinoza, Sylvia Buentello, Ronald T Hellberg, Sheri Denman, Jeffrey Hunt, Gabriella Martinez, Aline Trejo Chavez, Judy Kestner, Elaine S Bockholt, Judy Kestner, Dennis L Denman, Sharon Bush, Bette Cranford, Dawn Cunningham, Stefanie Simmons, David M Donald, Lorraine Morales, Raelynn Vallejo, Norma Castaneda, Concerned Citizen, Fred Wollmann, Randy Light, Mckenzie Hahn, Elida I Castillo, Elliott Dziuk, Leanne Lhironnelle, Patty Marie Callaway, Marigail Reyna, Matilda Herrero, Sylvia Campos, Connie Swetlick, Melissa H Longoria, Felix Trevino, Ashley Paredez, Sara Williams, Eduardo Beltran, Adrienne Kerr, Travis J Zurick, Debbie Cleveland, Jeanette Naranjo, Beverley S Douglass, Art Hinojosa, Letisia Avalos, Rinaldo Z Juarez, Edith J Sijansky, Maria E Garcia, Tarah Longoria, April Eddlemon, Cristel Gonzalez, Makayla Roberts, Bethany Santillan, Kelley Jo Carrillo, Barbara Schroeter, Alexander Marroquin, Katherine Allsup, Christopher Perez, Pete Flores, Aline Trejo Chavez, Thomas Forrest, Ashley Ordway, Scott Ramsey, Ryan David Bull, Joshua Taylor, Bethany Santillan, Kimberly Castaneda, Kasi Valle, Ariel Vasquez, Veronica Guerra, Mark Muenster, Judy Hernandez, Martin Zurick, Socorro Ramos-Aviles, Doris Mcdermott, Ruben Vela, Maggie Peacock, Roger S Brooks, Jason R Hale, Marty De Los Santos, Suzanne Gallagher, Mackenzie E, Emily Barrera, Charles Bailie, Doris Mcdermott, Sarah Duran, Jason Garcia, Samuel Y Alaniz, Hannah Garcia, Patricia Kocurek, Sandra L Rathke, Stefanie Simmons, Joanne Marquez, Adelita Cavada, Connie Pilarczyk, Ruby Ann Lara, Sierra Salinas, Susie Luna-Saldana, Diane Rojas, Laura Hernandez, Gracie Vallejo, Sandra A Arizmendi, Edward John Marez, Monica Perez, Janie Aleman, Jim Morgan, Miranda Schawe, Tara Paredez, Barbara Geis, Mona Lisa Biberstein, Rosie Chavez, Lori Rosas, Cindy Cravey, Marie Lucio, Kimberly Sigala, Linda Johnson, Phyllis Carrier, Victoria Sharpless, Irma Gonzalez, Joye Posey, Blanca Parkinson, Leslie Barber, Marty Prater, Monica Studer, Jason R Hale, Malena Dawn Cocran, Jimmy Morales, Amanda Breland, Lori Crisp, Lauren McNabb, Tandi Rasmussen, Juan Olguin Ramirez, Renee Kozak, Mary Najvar Barbee, Santiago Garcia, Joye Posey, Margot Moczygemba, Megan Bull, Holly Bockholt, Gilberto Espinoza, P Hernandez, Cameron Zarate, Misty Villarreal, Richard Perez, Doris Mcdermott, Stephanie Ponce-Perales, Charles Bockholt, Kayla M Orona, Betty Schiro, Leeann Mota Garza, Mona Lisa Biberstein, Yolanda Cruz, Victoria Sharpless, Patty Miller, Lydia C Secrest, Sheryl Hines, Bridgett Vela, Vickie Wilson, Colleen Ann Krizak, Monica R Kirkland, Elliott Dziuk, Alan Flores, Tommie Sue Arnold, Jennifer Gracia, David Guzman, Christine Valenzuela, Joanne Tiller, Melissa Beltran, Carolyn Walter, Arsilia Morin, Kathleen Bowers, David Everett Mckesson, Patricia Eley, Matteson Kapa, Melinda Carrasco, Veronica Guerra, Chris Truax, Alma Marie Studer, Chelsea Hodges, Reagan Ivey, Cordelia Bosquez, Bobby Hinds, Rick Longueira, Lorraine Morales, Robert Cook,

Betty Paine, Carolyn Walter, Anthony Vigue, Conor B Rice, Esperanza Alonzo, Trudy L Perriraz, Ashley R Garcia, Shannon Arevalo, Catharena Leerae Mireles, Candace Barrios, Sara Lopez, Dalia L Burton, Tina G Del Gallo, Trudy L Perriraz, Gloria Berger, Kathy Otahal, Jeanette Allen Krizak, Maria Louisa Evans, Kimberly Castaneda, Michael M Saldana, Mary Louise Vanderslice, Jennifer Zurick, Chloe Villarreal, Kimberly Sturgis, Deborah Holloway, Sharon Capeheart, Suzanne Gallagher, Harold Blair, Ahlix Velasco, Jean Chapman, Karen Frederick, Ruben Rodriguez, Melanie Grant, Taylor Cravey, John R Callaway, Alma Marie Studer, Ty Laner, Marissa Gamboa, Shir Trevi, Dorothy Pena, Elizabeth Silva, Julie E Perkins, Leticia Jimenez, Emily Hernandez, Mary Rodriguez, Marty De Los Santos, Christine McCloy, Pete Flores, Samuel Y Alaniz, Melissa M Ducote, David Wilson, Mona Lisa Biberstein, Christina Nelson, Mark Muenster, Madeline Rosales, Kendall Messer, Sara Garza, Candace D Gonzales, Jody Messer, Laramie Fain, Javier O Franco, Shelby Gillihan)

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.

NAAQS

The 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, NO₂, VOC, PM, PM₁₀, PM_{2.5}, and SO₂. 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. Table 1 contains the results of the de minimis analysis.

¹ 40 CFR 50.2

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

Table 1. Modeling Results for De Minimis Review

Pollutant	Averaging Time	GLC _{max} (µg/m ³)	De Minimis (µg/m ³)
NO ₂	1-hr	36	7.5
NO ₂	Annual	1.1	1
CO	1-hr	913	2000
CO	8-hr	71	500
PM ₁₀	24-hr	4.8	5
PM _{2.5}	24-hr	1.8	1.2
PM _{2.5}	Annual	0.08	0.2
SO ₂	1-hr	3.2	7.8
SO ₂	3-hr	207	25

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. 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.

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)
NO ₂	1-hr	36	94	130	188
NO ₂	Annual	1	21	22	100
PM _{2.5}	24-hr	2	24	26	35
SO ₂	3-hr	207	10	217	1300

The NAAQS 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.

Effects Screening Levels

ESLs are specific guideline concentrations used in TCEQ's evaluation of certain pollutants. These guidelines are derived by 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. 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 satisfy the MERA criteria and therefore are not expected to cause adverse health effects.

³See APDG 5874 guidance document.

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 (Table 3 below).

Table 3. Health Effects Modeling Results

Pollutant	CAS#	Averaging Time	GLC _{max}	GLC _{max} Location	ESL (µg/m ³)
Ammonia	7664-41-7	1-hr	100	N Property Line	180
Diesel Fuel #2	68476-34-6	1-hr	238	S Property Line	1000

State Property Line Analysis (30 TAC Chapter 112)

Because this application has sulfur emissions, the Applicant conducted a state property line analysis 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.

Ammonia Toxicity

TCEQ sets safe levels of chemicals in the environment that protect against short-term exposure (e.g., 1 hour) and long-term exposure (1 year to a lifetime). When people are exposed to high enough concentrations of ammonia (5,000 parts per billion [ppb] or higher) for a short period of time, they can experience eye discomfort, headaches, dizziness, and feelings of intoxication. At even higher concentrations, ammonia causes irritation in the upper respiratory tract. The safe levels developed by TCEQ (260 ppb for short-term exposure) are much lower than concentrations of ammonia that cause these adverse health effects. Ammonia mostly causes short-term effects as described above and has little long-term toxicity. TCEQ's long-term safe level (130 ppb) is protective of potential effects from chronic exposure to ammonia.

There is no evidence that ammonia causes effects on fetal development. When you breathe in ammonia, it remains in the upper respiratory tract, which includes the nose, throat, and larynx (voice box). Most of what is breathed in is exhaled (breathed out). Very little inhaled ammonia makes it into the bloodstream so it will not reach the fetus. Therefore, effects on the development of a baby are not expected to occur.

There is also no evidence that ammonia causes cancer. The United States Department of Health and Human Services, the United States Environmental Protection Agency, and the International Agency for Research on Cancer have not classified ammonia as a cancer-causing chemical.

There are reports in the scientific literature of human deaths resulting from inhalation of ammonia. Most of these reports are of short-duration accidental exposure to very high concentrations of ammonia (equal to or higher than 2,500,000 ppb) in industrial or occupational/work settings.⁴ The National Institute for Occupational Safety and

⁴ Agency for Toxic Substances and Disease Registry (ATSDR). 2004. Toxicological Profile for Ammonia. Available at <https://www.atsdr.cdc.gov/toxprofiles/tp126.pdf>

Health (NIOSH) has set a concentration of 300 ppm (equivalent to 300,000 ppb) as immediately dangerous to life or health (IDLH).⁵ TCEQ's safe level for short-term exposure (260 ppb) is more than 1,000-times lower than the IDLH.

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 proposed emission rates associated with this project.

Comment 2: Dust control/nuisance

Commenters are concerned about dust generated by the proposed project.

(Elizabeth Zurick, Benny Perriraz, Trudy L. Perriraz, Connie Pilarczyk,)

RESPONSE 2: The primary activities that have the potential to emit particulate matter (i.e. dust) resulting from this project are from the cooling tower and emergency engines within the property line of the facility. All of the potential dust concentrations from the permitted sources have been evaluated based on operating parameters represented in the application and compared to the federal criteria mentioned above. The proposed permit contains the required control processes to minimize dust. 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 nuisance 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.

Comment 3: Flora/fauna/habitat loss

Commenters are concerned about the effect of the proposed project on flora, fauna, and habitat loss. Commenters expressed concern about nearby farmland, gardens, and livestock, including laying hens. Commenters expressed concern about local wildlife, including effects on bird watching.

(Richard Perez, Tina Trevino, Alexis Garcia, Deborah Donald, John Edward Carrillo, Dennis L Denman, Debbie Cleveland, Deborah Donald, Callie Noakes, Dawn Cunningham, Connie Pilarczyk, Alma Marie Studer, Betty Paine, Ronald T Hellberg, Suzanne Gallagher, Macy Winchester, Myra B Alaniz, Trudy L Perriraz, Karen Byrd, Carolyn Walter, Kadie Kay Simmons, Gabriella Martinez, Yolanda Morin, Martin Zurick, Elizabeth Zurick, Jeffrey Hunt, Judy Kestner, Julie E Perkins, Ashley Paredez, John Cole Carrillo, Tracie Hatch, Elisabeth Castaneda, Scott Ramsey, Amanda Davis, David M Donald, Elliott Dziuk, Emily Barrera, Holly Bockholt, Patricia Kocurek, Patty Miller, Raelynn Vallejo, Doris Mcdermott, Ruben Vela, Richard Perez, Martin Zurick, Doris Mcdermott, P Hernandez, Phyllis Carrier, Suzanne Gallagher, Lori Rosas, Solomon Ortiz, Aaron Gutierrez, Trudy Perriraz, Benny Perriraz, Carolyn Walter, Ernesto Pruneda, Mandilea Sykora, Conor B Rice, Michael Cleveland, Julianna Ortiz, Stefanie Simmons, Victoria Sharpless, Tina G Del Gallo, Maria E Garcia, Ruth L Crook, Amanda Breland, Renee Kozak, Laurinda Dear, Renee Kozak, Jennifer Zurick, Stephanie Ponce-Perales, Coastal Bend Sierra Club (James E Klein), Reagan Ivey, Trudy L Perriraz, Jacquelyn Tleimat, Maegan Morales, Brittany Donald, Sarah Bailie, Maria Louisa Evans,

⁵ <https://www.cdc.gov/niosh/idlh/7664417.html>

Mike W Harvey, Cody Benavides, Jennifer Gracia, Suzanne Gallagher, Benny Perriraz, Clifford Anderson, Phyllis Carrier, Donald Bailie, Rebecca Martinez, Paul Pilarczyk, Caleb Ray Morales)

RESPONSE 3: 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. Please 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.

Ammonia:

Ammonia is naturally occurring in the atmosphere and is used by plants as a source of nitrogen. However, at high concentrations (at least 2,900 ppb) ammonia can cause direct toxic effects on the leaves of plants.

Available data indicates that ammonia has similar effects in humans and animals. Based on the available scientific data, the health-protective levels for humans should also be health protective for animals as well.

The modeled concentrations of ammonia from the Nueces Green Ammonia plant are much lower than the concentrations shown to produce damage to leaves of plants (2,900 ppb) or cause adverse health effects on animals (5,200). Therefore, this facility is not expected to cause adverse effects on nearby plants or animals.

More details about Ammonia emissions are in Response 38.

Comment 4: Construction Emissions

Richard Perez is concerned about emissions created during the construction of this project.

RESPONSE 4: TCEQ does not have authority under the TCAA to regulate emissions from mobile sources. Construction equipment such as bulldozers and portable generators are considered mobile or non-road sources. However, TCEQ does require owners and operators to comply with 30 TAC § 101.4 which prohibits a person from creating or maintaining a condition of nuisance such as interference with the normal use and enjoyment of property. Individuals are encouraged to report any concerns about nuisance issues by contacting TCEQ Corpus Christi Regional Office at (361)-881-6900 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

Comment 5: County's Nonattainment Status

Commenters are concerned that the emissions from this project could cause the county to be designated as nonattainment.

(Jason R Hale, Elida I Castillo)

RESPONSE 5: Nueces County is currently designated as being in attainment or unclassifiable for all pollutants. An impacts analysis was conducted for this project and demonstrates that the proposed facility will not cause or contribute to an exceedance of the NAAQS; therefore, the project is not expected to cause the county to be designated as nonattainment.

Comment 6: Air Monitor Request

Commenters requested that an air monitor be located in their area.

(Melissa Zamora, Cody Benavides, Rowdy Bergstrom, Jason R Hale, Pete Flores, Bette Cranford, Elida I Castillo, Bette Cranford, Elida Castillo)

RESPONSE 6: Due to cost and logistical constraints, the placement of air monitors is prioritized to provide data on regional air quality in areas frequented by the public. The existing air monitoring network is the result of a strategic balance of matching federal monitoring requirements with state and local needs. Consistent with federal air monitoring requirements, TCEQ evaluates the placement of air quality monitors within the air monitoring network using trends in population, reported emissions inventory data, and existing air monitoring data for a given area. In addition, TCEQ may prioritize monitor placement in areas with potential regional air quality issues, such as those related to increased oil and gas activity in the Barnett Shale and Eagle Ford Shale areas.

TCEQ annually evaluates the number and location of air monitors within its network to assess compliance with federal monitoring requirements and the adequacy of monitoring coverage for identified monitoring objectives as a part of the Annual Monitoring Network Plan provided to EPA on July 1 of each year. This plan is made available on TCEQ's website for public review and comment for 30 days beginning in mid-May. Requests for additional monitoring or the identification of additional monitoring needs may be made during this public comment period and will be considered along with other monitoring priorities across the state. To receive email announcements related to the ambient air monitoring network, including the availability of the Annual Monitoring Network Plan for public review and comment, please visit the following link <https://service.govdelivery.com/accounts/TXTCEQ/subscriber/new> and select "Air Monitoring Network Announcements."

Stationary air monitors are sited to measure air quality that is representative of a broader area or region. Therefore, monitors are not typically placed to measure the impacts from specific industrial facilities.

Comment 7: Monitor for Air Quality Analysis

Commenters asked about the air monitor used to evaluate baseline emissions. They requested that local monitors be used rather than monitors from outside the impacted area.

(Ivan Alvarez, Myra B Alaniz, Jason R Hale)

RESPONSE 7: Background concentrations in the air quality modeling analysis are used to account for ambient concentrations from other industrial, natural, and man-made sources in the area around the plant that are not explicitly modeled. Since there are no

regulatory monitors in Robstown, TX, the Applicant selected ambient monitor data from EPA AIRS monitor 483550026 (9860 La Branch, Corpus Christi, Nueces County), EPA AIRS monitor 483550032 (3810 Huisache St., Corpus Christi, Nueces County), and EPA AIRS monitor 482011035 (9525 ½ Clinton Dr., Houston, Harris County) to represent background concentrations in the analysis. The applicant's approach to select and justify background concentrations was conservative and consistent with TCEQ guidance. For each monitor, the Applicant conducted a quantitative review of emissions in the vicinity of the monitor site relative to the proposed project site. A quantitative review of emissions in the surrounding area of the monitor site relative to the project site is one of the methods to evaluate the representativeness of an air quality monitor. The reported emissions in the vicinity of the selected monitor sites were greater than the reported emissions in the vicinity of the proposed project site. Thus, background concentrations from the selected monitors are conservative because background concentrations in the vicinity of the selective monitors are expected to be higher than background concentrations in the vicinity of the proposed project. TCEQ reviewed the Applicant's air monitoring data analyses and supporting justification and concluded it was reasonable.

Comment 8: Climate Change

Laramie Fain is concerned about the effects of this project in relation to climate change.

RESPONSE 8: EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there is no National Ambient Air Quality Standard (NAAQS) for GHGs, including no PSD increment. The EPA Administrator has recognized that human-induced climate change has the potential to be far-reaching and multi-dimensional.⁶ 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. Quantifying the exact impacts attributable to a specific GHG source obtaining a permit in specific places and points would not be possible with current climate change modeling.⁷ 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, TCEQ has determined that an air quality analysis for GHG emissions would provide no meaningful data and has not required the Applicant to perform one.

Comment 9: Public Notice - Newspaper Publication

David M. Donald stated that the newspaper selected for public notice was not appropriate.

RESPONSE 9: The 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 TCEQ requires by rule. The commission also requires that notice be published in an alternative language

⁶ See Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, 75 Fed. Reg. 66496, 66497 (Dec. 15, 2009).

⁷ See EPA PSD and Title V Permitting Guidance for GHGs, March 2011 at 48.

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. TCEQ adopted rules for these public notice requirements in 30 TAC § 39.603, Public Notice of Air Quality Applications, Newspaper Notice.

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.

Here, The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit 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 Grupero News*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on July 1, 2024, in English in the *Corpus Christi Caller Times* and in Spanish in *Tejano y Grupero News*.

Comment 10: Public Notice - Sign posting

Commenters questioned if the sign posting requirements were met.

(Alexis King, David M Donald, Alexis King, Suzanne Gallagher)

RESPONSE 10: 30 TAC § 39.604 requires that signs be placed at the site of the existing or proposed facility. The sign(s) must state that an air permit application has been filed, the proposed permit number, and how the public may contact the commission for further information.

Each sign placed at the site must be located within ten feet of every property line paralleling a public highway, street, or road. Signs must also be visible from the street, meet lettering requirements, meet size requirements, and be spaced at not more than 1,500-foot intervals. A minimum of one sign, but no more than three signs are required along any property line paralleling a public highway, street, or road. Finally, in cases where notice is required to be published in an alternative language, the applicant must also post signs in the applicable alternative language.

The Applicant provided verification to the Office of the Chief Clerk in accordance with 30 TAC § 39.605 that signs were posted at the proposed site in accordance with 30 TAC § 39.604.

Comment 11: Location of Public Meeting

Commenters questioned the location of the public meeting.

(Juan "Chuy" Hinojosa, Ryan Lawhon, Arsilia Morin)

RESPONSE 11: Title 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 TCEQ Executive Director determines that there is substantial or significant degree of public interest. A public meeting was held on July 29, 2024, at the Richard M. Borchard Regional Fairgrounds Conference Center in Robstown, Texas. This location was selected because it was the closest meeting facility to the proposed project location that could accommodate the number of people

expected to attend the meeting.

The Office of the Chief Clerk works with the applicant to locate a venue. Further questions about venue choice can be directed to the Chief Clerk's Office at 512-239-3300.

Comment 12: Access to permit documents

Commenters stated that they did not have access to the permit documents.

(Marie Lucio, Suzanne Gallagher, Sandra A Arizmendi)

RESPONSE 12: Title 30 TAC § 39.405 requires the 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 that the application was made available at the Keach Family Library, 1000 Terry Shamsie Boulevard, Robstown, Nueces County, Texas. In addition, a copy of the application was also available at TCEQ Corpus Christi Regional Office and TCEQ Central Office.

Comment 13: 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.

(Fred Wollmann, Patty Miller, Katherine Allsup, Julie Prater, Wendy Genz, Yolanda Cruz, Concerned Citizen, Janie Aleman, Jim Morgan, Raelynn Vallejo, Michele Hoelscher, Kelley Jo Carrillo, Sara Dennis, Randy Light, Laramie Fain, Sheryl Hines, Travis J Zurick, Rocky Lorenz, Betty Schiro, David M Donald, Gilberto Espinoza, Aline Trejo Chavez, Leeann Mota Garza, Elliott Dziuk, Bridgett Vela, Rebecca Ballard, Bette Cranford, Gary Capeheart, Marty De Los Santos, Cameron Zarate, Cindy Cravey, Melinda Vasquez, Marie Lucio, Misty Villarreal, James Fortner, Edward John Marez, Cheryl Majek, Taylor Cravey, Ruby Ann Lara, Connie Pilarczyk, Del Essig, Lori Crisp, Joye Posey, Christine Mccloy, Joanne Marquez, Samuel Y Alaniz, Colleen Ann Krizak, Laura Hernandez, Diane Rojas, George F Picha, Doris Mcdermott, Bill Mcgregor, Norma Castaneda, Felix Alonzo, Phyllis Carrier, Sharon Bush, Cynthia Ann Cleavelin, Michael Vejar, Melissa H Longoria, Rosie Chavez, Emily Hernandez, Carolyn Whiteaker, Miranda Schawe, Joshua Taylor, Richard Perez, Sara Williams, Linda Ramirez, Roger S Brooks, Felix Trevino, Robin Reinhard, Linda Stclair, Adrienne Kerr, Adrienne Shephard, Carlos S Costilla, Monna Lytle, Andrea Driver, Joe Trevino, Myra B Alaniz, Esperanza Alonzo, Shannon Shows, Mary Louise Johnson, Ruth L Crook, Bethany Santillan, Alvin Morin, Holly Bockholt, Laura Picha, Margot Moczygemba, Karen Bravenec, Melinda Malone, Jennifer Rivera, Eusebio C Torres, Christinna Elizondo, Kathy Rokohl, Santiago Garcia, Lorraine Ann Silguero, Patricia Kocurek, Aaron Gutierrez, Audrey Cervantes, Johanna Vela, Suzanne Haas, Trudy L Perriraz, Kathy Ricks, Candace Barrios, Michael Castaneda, Joshua Kirkland, Kimberly Graves Olszewski, Arnoldo Gonzalez, Hailey Riley, Carolyn Walter, Mireille Dziuk, Steve Kapa, David Avalos, Vickie Wilson, Alvin Morin, Esperanza Salinas, Tina G Del Gallo, Kimberly Graves Olszewski, Debbie Cleveland, Cristel Gonzalez, Marcia Layton, Rumaldo Z Juarez, Leslie Barber, Edith J Sijansky, Marcus Crisp, Malena Dawn Cocran, Maria E Garcia, Bianca Martinez, Donna Peters, Dawn

Cunningham, Clint Cunningham, Donna Williamson, David M Donald, Judy Hernandez, Bethany Santillan, Cassaundra Klawinsky, Monica Studer, April Eddlemon, Stefanie Simmons, Gerald Perez, Alexander Marroquin, Christopher Perez, Tarah Longoria, Renee Kozak, Scott Ramsey, Odilia G Torrez, Patricia Kocurek, Shelby Gillihan, Cassie Edwards, Mary Ramon, Holly Bockholt, Shannon Shows, Andres Huerta, Letisia Avalos, Angela Dixon, Amanda Rodriguez, Anita Contreras, San Juanita Perez, Irma Gonzalez, Jacquelyn Tleimat, Amy Luna, Beverley S Douglass, Chelsea Hodges, Art Hinojosa, Jeanette Naranjo, Mary Najvar Barbee, Elizabeth Zurick, Felix Trevino, Ayelet Deluna, Karen Byrd, Albert Lee Studer, Dennis L Denman, Javier O Franco, Janel Wilson, Rhonda K Koenning, Sheri Denman, Mark Muenster, Marissa Gamboa, Kenneth Wayne Hanke, Sylvia Buentello, Sharon Capeheart, Ronald T Hellberg, Mona Lisa Biberstein, George Brandon Schilter, Randy Stanton, Maribel Trevino, Janice Kimball, Kendall Messer, Linda Johnson, Julianna Ortiz, Lilly C Smith, Richard C King, Melanie Grant, Trudy L Perriraz, Thomas Perrigue, Beatriz Alvarado, James R Malek, Beth Hartman, Greg Frederick, Estaban Arredondo, Diana Rosas, Dorothy Pena, Silvia G Henderson, Joshua Mock, Patricia Kocurek, Mandilea Sykora, Kayla M Orona, Michael M Saldana, Deborah Donald, Angela Hernandez, Rachel Suarez, Jeffrey Hunt, Elizabeth Silva, Darci D Forrest, Aline Trejo Chavez, Melissa Pinkerton, Marlena Boatwright, Deeanna Contreras, Kimberly Picozzi, Melanie Grant, Mark Berger, Oralia Womack, Kadie Kay Simmons, Allison Fought, Reagan Ivey, Sara Garza, Patti Mathisen, Martin Zurick, Thomas Forrest, Elizabeth Mcvay, Mariann Herrington, Dottie Fortner, Alexis Garcia, Norma Longoria, Patricia Kocurek, Darci D Forrest, Korina McGraw, Benjamin Tyler, Rosalinda Otero, Lela Gutierrez, Karen R Vaughan, Jessalyn Dixon, Elaine S Bockholt, Kimberly Sturgis, Alice T Ligon, Brianna Franco, Judy Vest, Kandyce Bergman, Candace D Gonzales, Paul Pilarczyk, Suzanne Gallagher, Allison Guerra, Klint Hoelscher, George Brandon Schilter, Sandra A Arizmendi, Patricia Kocurek, Dawn Cunningham, Ahlix Velasco, Rose Cavazos, Trudy L Perriraz, Julie E Perkins, Michael Adams, Brianna Franco, Judy Kestner, Sarah Duran, Laramie Fain, Suzanne Gallagher, Christina Nelson, Patricia Kocurek, Sandra L Rathke, Amanda Davis, Glenn Ann Bickham, Daniel Lopez, Mackenzie E, Eduardo Beltran, Albert Lee Studer, James McCain, Abel Herrero, Mona Lisa Biberstein, Alexa Oliviera, Elisabeth Castaneda, Doris Mcdermott, Joe Koniakowsky, Bette Cranford, Melissa Hughson, Denise Hoff Otahal, Kasi Valle, Melissa M Ducote, David Wilson, Chloe Villarreal, Richard Perez, Andrea Kiarra De Los Santos, Tandirasmussen, Leticia Jimenez, Kimberly Sigala, Jody Messer, Ty Laner, Dennis Craig Jones, Doris Mcdermott, Stefanie Simmons, Maggie Peacock, Sharon Burck, Hannah Garcia, Charles Bockholt, Jason R Hale, Patricia Kocurek, Stephanie Ponce-Perales, Kimberly Castaneda, Socorro Ramos-Aviles, Solomon Ortiz, Bobbie Evans, Britanie Pavlicek, Jessica Elam, Laura Huerta, Autumn Hensiek-Fain, Jeanessa Escamilla, Gloria Berger, Veronica Guerra, Mallory Winchester, Joe Villarreal, Samantha Younger, Harold Blair, Karen Frederick, Tina G Del Gallo, Lauren McNabb, Pablo Contreras, Jean Chapman, April Garza, Andrea Kiarra De Los Santos, Renee Kozak, David Yepez, Ida D Zamarripa, Deborah Holloway, M Hughson, Jesus S Molina, John Cole Carrillo, Tracie Hatch, Kimberly Castaneda, Laura Camarena, Connie Pilarczyk, Ingrid Isabelle Lahaye, Alicia Kay Dunn, Elizabeth Boazman, Nhu Hankins, Bruce K Hoelscher, Andrew Morin, Matt Chapman, Kathy Otahal, Mary Louise Vanderslice, Ralph Green, Jennifer Zurick, Sonja Cedillo, Chelsea Hodges, Tommy Dunlavy, Danika Anderwald, Alexis Ramirez, Jeanette Allen Krizak, Mireille Dziuk, Dich Coles, Juan S Garcia, Margaret A Walz, Fernando Hernandez, Eli Mckay, Angela Marroquin, Myra B Alaniz, Kathleen Hurst, Sara Lopez, Lori M Mikulec, Lorraine Morales, Alma Marie Studer, Trudy Perriraz, Benny

Perriraz, Cheryl Green, Melissa Beltran, John Mcknight, Myra B Alaniz, Loss E Thomas, Kathleen Bowers, Ashley Morgan, Robert Cook, Robert Dennis, Sandra A Arizmendi, Horacio Rubio, Alis Mills, Ernesto Pruneda, Chris Truax, Suzanne Gallagher, Emma Waylon, Dennis L Denman, David Everett Mckesson, Sabrina Winchester, Ralph Green, Johnny Rodriguez, Rose Sims, Yolanda Hernandez, Jeanette Hughes, Monica R Kirkland, David Guzman, Melinda Carrasco, Karen R Vaughan, Alexis King, Sandra A Arizmendi, Phyllis Carrier, Gwen Higerd, Judy Shurley, Arnold Morin, Rachel Garcia, Amanda Rodriguez, Jerimey Dear, Carolyn Walter, Alexis Denielle Solorio, Ester Maria Paredez, Jennie Barber, Ellen Murphy, Caren Gavlik, Alexis King, Martin Zurick, Sister Patricia Burns, Jose Gonzalez, Patricia Kocurek, Richard Rodriguez, Lorraine Morales, Catharena Leerae Mireles, Ryan W Mcnabb, Connie Pilarczyk, Dennis L Denman, Sharon Capeheart, Arsilia Morin, Patricia Taber Jones, James Cray Schanen, Robert G Hernandez, Denise Hoff Otahal, Marty De Los Santos, Randy Light, Jarrett Barber, Maria Rhodes, Demi Navarrete, Reagan Ivey, Sandra Davis, Paisley Forrest, Gaylon Krizak, Jeanette Krizak, Kacie Storm, Laura Gomez, James Gary Byrd, Ashley R Garcia, Patricia Eley, Sister Eileen Doherty, Maria Cristina Halberdier, Stefanie Perez, Jane Longoria, Veronica Guerra, Dalia L Burton, Elizabeth Zurick, Miranda Luna, Candace Garcia, Phyllis Carrier, Juliette Nisbet, Katherine Bull, Karen R Vaughan, Lydia C Secrest, Janie Dugger, Bruce Dugger, Sharon Kay Williams, Joshua Lee George, Autumn Hensiek-Fain, Tina Trevino, Tim Walz, Victor Digesti, Leoberto Salinas, Suzanne Gallagher, Arsilia Morin, Betty Paine, Felix Alonzo, Kimberly Amy, Denise Hoff Otahal, Joanne Tiller, Anthony Vigue, Buddy Toepfer, Amber Watkins, Alan Flores, Michael Cleveland, Holly Bockholt, Gary Burney, Carol Burney, Glen H Merritt, Tanya Bergstrom, Deborah Kocurek Eckel, Miguel Santillan, Amanda Galvan, Macy Winchester, Brittany Donald, Conor B Rice, Clifford Anderson, Curtis Manning, Jennifer Gracia, Elizabeth Zurick, Sam Longoria, Matteson Kapa, Raquel Valenzuela, Marissa Valenzuela, Louise Cook, Dixie Villarreal, Bette Cranford, Mercedes Gutierrez, Bob Matthews, Marie Lucio, Patricia Kocurek, Rachel Caballero, Fred Wollmann, Christine Valenzuela, Trudy Perriraz, Benny Perriraz, Lisa Bockholt Hanke, Deborah Donald, Ashley Ramsay, Sharon Burck, Rachel Clowdus, Eli Mckay, Maryann Markert, Mona Lisa Biberstein, Jerry Jernigan, Betty Jernigan)

RESPONSE 13: 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 TCEQ. Zoning and land use are beyond the authority of 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.

TCEQ Corpus Christi Regional Office conducted a site review of the area on February 2, 2024. According to that site review, nuisance, odor, and hazard potentials were moderate to high. The review also described the surrounding land use as a “rural area mixed with residential property,” and the nearest off-property receptor is a residential property approximately 130 feet away. The distance from the facility to the nearest property line, according to the site review, is approximately 200 feet. The recommendation of the Regional Office was to proceed with the permit review and the site review indicated no reasons to deny the permit application.

Although TCEQ cannot consider zoning or land use, TCEQ does conduct a health

effects review to ensure that there will be no adverse impacts to human health and welfare. As described in Response 1, a protectiveness review was conducted for all contaminants emitted. The maximum concentrations were evaluated at the property line, at the nearest off-property receptor, and at any schools located within 3,000 feet of the facilities and found to be protective of human health and the environment.

Comment 14: Quality of Life/Aesthetics/Property value

Commenters are concerned about the effect of the proposed project on their quality of life, on the aesthetics of the area, and on their property value.

(Emily Barrera, Sandra Davis, Melanie Grant, Randy Light, Lisa Bockholt Hanke, Trudy L Perriraz, Edward John Marez, Doris Mcdermott, Elida I Castillo, Abel Herrero, Sierra Salinas, Buddy Toepfer, Abel Herrero, Laura Gomez, Richard C King, Emma Martinez, Mandilea Sykora, Connie Pilarczyk, Rose Cavazos, Frank Gomez, Omar Gomez, Juan Martinez, Lorraine Morales, Patricia Kocurek, Allen Menn, Sarah Bailie, Greg Frederick, Ashley Paredez, Jennifer Pantoja, Suzanne Gallagher, Raelynn Vallejo, Samuel Y Alaniz, Maria Louisa Evans, Ruby Ann Lara, Judy Kestner, Marie Lucio, George F Picha, Diana Rosas, Stephanie Ponce-Perales, Autumn Hensiek-Fain, Robert Cook, Roger S Brooks, Veronica Guerra, Matilda Herrero, Gilberto Espinoza, Mireille Dziuk, Ashley R Garcia, Ariel Vasquez, Jessica Elam, Yolanda Morin, Sandra A Arizmendi, Angela Marroquin, Suzanne Gallagher, Mike W Harvey, Richard Perez, Connie Pilarczyk, Melissa Zamora, Mark Muenster, Jimmy Morales, Thomas Mullenix, Joshua Taylor, Victoria Sharpless, Marigail Reyna, Daniel Lopez, Abel Herrero, Ruben Rodriguez, Rebecca Menn, Leanne Lhironnelle, Janie Aleman, Jim Morgan, Solomon Ortiz, Mona Lisa Biberstein, Tara Paredez, Janie Dugger, Bruce Dugger, Donald Bailie, Doris Mcdermott, Lilly C Smith, Pete Flores, Victoria Sharpless, Andrea Kiarra De Los Santos, Sabrina Winchester, Sylvia Campos, Dixie Villarreal, Lauren Mcnabb, Miguel Gutierrez, Myra B Alaniz, Bruce K Hoelscher, Arnold Morin, Raymond Martinez, Victoria Sharpless, Candace D Gonzales, Sylvia Buentello, Ray Bailey, Patricia Kocurek, Rebecca Menn, Trudy L Perriraz, Laura Picha, Carlos S Costilla, Margot Moczygamba, Kathy Rokohl, David Merritt, Kendall Messer, Sharon Capeheart, Rumaldo Z Juarez, Lorraine Morales, Letisia Avalos, Thomas Perrigue, Rhonda K Koenning, Amanda Breland, Norma Longoria, Sabrina Winchester, Kimberly Graves Olszewski, Alice T Ligon, Laramie Fain, Benjamin Tyler, Elaine S Bockholt, Trudy L Perriraz, Aline Trejo Chavez, Eli Mckay, Rachel Clowdus, Crittenden, Crittenden, Melanie Grant, Victor Digesti, Karen R Vaughan, Mireille Dziuk, Rebecca Martinez, Kathy Ricks, Vanessa Cantu, Ginger Martinez, Esperanza Salinas, Alexis Garcia, Bette Cranford, Brendan Pierce, Kelley Jo Carrillo, Rick Longueira, Joe Trevino, Julie E Perkins, Caleb Ray Morales, Ryan W Mcnabb, Ruth L Crook, Joshua Lee George, Trudy Perriraz, Benny Perriraz, Conor B Rice, Connie Pilarczyk, Alma Marie Studer, Heidi Wangen Gutierrez, Floyd Gonzalez, Andrea Driver, Bobby Hinds, Holly Bockholt, Suzanne Gallagher, Alma Marie Studer, Kenneth Wayne Hanke, Blake Bocan, T Morgan, Bridgett Vela, Albert Lee Studer, Makayla Roberts, Jason R Hale, Cody Benavides, Richard Perez, Phillip Evans, David M Donald, Gabriella Martinez, Stefanie Perez, Reagan Ivey, Leslie Barber, Alexander Marroquin, Maegan Morales, Malena Dawn Cocran, Pamela Joyce Smith, Rachel Suarez, Roxanna Espinoza, Martin Zurick, Charles Bailie, Kayla M Orona, Gaylon Krizak, Jeanette Krizak)

RESPONSE 14: TCEQ does not have the authority to consider potential effects from plant location, aesthetics, zoning and land use issues, or effects on property values when determining whether to approve or deny this air permit.

Comment 15: Noise

Commenters are concerned about noise from the proposed project.

(Jarrett Barber, Mandilea Sykora, Holly Bockholt, Dennis L Denman, Brendan Pierce, Richard Perez, Ashley Paredez)

RESPONSE 15: TCEQ does not have authority under the TCAA to require or enforce any noise abatement measures. Noise ordinances are normally enacted by cities or counties and enforced by local law enforcement authorities. Commenters should contact their local authorities with questions or complaints about noise.

Comment 16: Light pollution

Commenters are concerned about the light pollution from the proposed project.

(Stefanie Perez, Holly Bockholt, Brendan Pierce, Aaron Gutierrez, Mandilea Sykora, Dennis L Denman, Rhonda K Koenning)

RESPONSE 16: TCEQ does not have authority under the TCAA to consider light pollution when determining whether to approve or deny a permit application.

Comment 17: Traffic/truck

Commenters are concerned about increased traffic of cars and trucks as a result of the proposed project.

(Kenneth Wayne Hanke, Frank Gomez, Omar Gomez, Rachel Suarez, Pete Flores, Lisa Bockholt Hanke, Richard Perez, Randy Light, Carolyn Walter, Kimberly Picozzi, Dixie Villarreal, Dennis L Denman, Clifford Anderson, Brendan Pierce, Ashley Paredez, Patricia Kocurek, Melissa M Ducote, Mandilea Sykora, Elaine S Bockholt, Holly Bockholt, Robert Cook, Fred Wollmann, Miguel Gutierrez, Ivan Alvarez, Heidi Wangen Gutierrez, Felix Trevino)

RESPONSE 17: Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting TCEQ Corpus Christi Regional Office at (361)-881-6900 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to possible enforcement action.

Although TCEQ rules prohibit creation of a nuisance, TCEQ does not have jurisdiction to consider traffic, road safety, or road repair costs when determining whether to approve or deny a permit application. In addition, trucks are considered mobile sources, which are not regulated by TCEQ. TCEQ is also prohibited from regulating roads per the TCAA § 382.003(6) which excludes roads from the definition of "facility."

Similarly, TCEQ does not have the authority to regulate traffic on public roads, load-bearing restrictions, and public safety, including access, speed limits, and public roadway issues. These concerns are typically the responsibility of local, county, or other state agencies, such as the Texas Department of Transportation (TxDot) and the Texas Department of Public Safety (DPS). Concerns regarding roads should be addressed to the appropriate state or local officials.

Comment 18: Effect on Local Economy

Commenters are concerned about the effects this project could have on the local economy, including creating jobs and long-term economic sustainability.

(T Morgan, Mark Muenster, David M Donald, Maegan Morales, Richard C King, Esperanza Salinas, Patricia Kocurek, Lauren Mcnabb, Frank Gomez, Omar Gomez, Mandilea Sykora, Leticia Jimenez, Doris Mcdermott, Chris Truax, Samantha Younger, Julianna Ortiz, Lorraine Morales, Ashley Paredez, Robert Cook, Buddy Toepfer, Joshua Lee George, Sharon Kay Williams, Miguel Gutierrez, Patricia Kocurek, Haley Coleman, Braden Menn, Ruth L Crook, Mallory Winchester, Clifford Anderson, Tina G Del Gallo, Ryan W Mcnabb, Alma Marie Studer, Heidi Wangen Gutierrez, Allen Menn, Carolyn Walter, Connie Pilarczyk, Reagan Ivey, Ashley R Garcia)

RESPONSE 18: Issues related to the local economy 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, TCEQ must grant the permit.

Comment 19: Best Available Control Technology

Commenters questioned the control technology proposed in the application.

(Jason R Hale, Kathy Rokohl, Holly Bockholt, Elida I Castillo, Cathy Fulton, Paul Pilarczyk, Bruce K Hoelscher)

RESPONSE 19: Best available control technology (BACT) is an air pollution control method for a new or modified facility that through experience and research, has proven to be operational, obtainable, and capable of reducing or eliminating emissions from the facility, and is considered technically practical and economically reasonable for the facility. BACT may be numerical limitations, the use of an add-on control technology, design considerations, the implementation of work practices, or operational limitations. The Applicant has represented in the permit application that BACT will be used for the proposed new and modified sources.

The contaminants authorized by this permitting action will be anhydrous ammonia, carbon monoxide, hazardous air pollutants, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, and sulfur dioxide. The primary control measures applied to this facility are flares. The permit reviewer evaluated the proposed BACT and confirmed it to be acceptable.

It is the applicant's responsibility to submit a BACT analysis addressing each pollutant emitted from each facility subject to review. The applicant identified and provided a discussion of options for reduction of emissions which resulted in their determination that a flare was the most appropriate option to be applied to the facilities to be controlled. This analysis was determined to be complete, reasonable, and representative of good engineering practices.

BACT for controlling ammonia emissions is established as combustion via a flare system. Flares achieve a high destruction efficiency for ammonia. Furthermore, flares are widely used as safety devices to depressurize systems and can control vent streams that vary in heat content. According to the EPA's Air Pollution Control Fact

Sheet, "Flares can be used to control almost any VOC stream, and can typically handle large fluctuations in VOC concentration, flow rate, heating value, and inert species content. Flaring is appropriate for continuous, batch, and variable flow vent stream applications, but the primary use is that of a safety device used to control a large volume of pollutant resulting from upset conditions." Control devices such as thermal oxidizers, vapor combustor units, and absorbers/adsorbers are not as efficient/capable of controlling variable waste streams. Lastly, flaring of ammonia eliminates any ammonia smell.

Comment 20: Emission Rates and Calculations

Commenters questioned the accuracy and methodology for determining the emission rates for the proposed project. Additionally, commentors expressed concerns with ammonia emission rates at the flares.

(Sandra A Arizmendi, Gary Capeheart, Myra B Alaniz, Bruce K Hoelscher, Elizabeth Zurick, Samuel Y Alaniz, James Cray Schanen, Rhonda K Koenning, Larry Fuhrken, Benjamin Tyler, Myra B Alaniz, Martin Zurick, Alma Marie Studer, Victoria Sharpless, Connie Pilarczyk, David M Donald, Paul Pilarczyk, Victoria Sharpless)

RESPONSE 20: Emissions from this facility were determined by manufacturer's data, TCEQ NSR Emissions Calculations (APD-ID 6v1, Revised 03/21)⁸; 2021 Emissions Inventory Guidelines (RG-360/21)⁹, or a mathematical equation calculated according to the EPA's Compilation of Air Pollutant Emission Factors, AP-42 Manual.¹⁰ 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. In addition, the permit holder must operate within the limits of the permit, including the emission limits as listed in the Maximum Allowable Emissions Rate Table (MAERT).

The onsite flares are used to minimize more harmful emissions which may result from degassing large equipment including storage tanks and heat exchangers as well as process streams associated with the ammonia synthesis process. The flares will not be used on a continuous basis. Flares are also used as safety devices for when equipment or piping becomes over-pressurized. Pressure relief valves automatically release excess gases or liquids to the flare and reset to stop the flow of gas to the stream as soon as the pressure returns to a safe level to ensure the safety of plant operations.

In regards to flaring of ammonia, the most important factor is exit velocity. According to a study by Zeeco, a world leader in the design and manufacture of advanced combustion and environmental solutions company, data shows that if the exit velocity at the flare tip is kept low, ammonia will burn to complete combustion (99% or higher destruction efficiency).¹¹ NSR Permit No. 174951 includes velocity requirements for the flare system to ensure proper/complete combustion of ammonia. Although the flare will operate at conditions that ensure proper/complete combustion of ammonia (99%

⁸https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/emiss_calc_flares.pdf

⁹<https://www.tceq.texas.gov/downloads/air-quality/point-source/guidance/rg-360-21-appendix-a.pdf>

¹⁰ <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-stationary-sources>

¹¹ <https://www.worldpipelines.com/magazine/hydrocarbon-engineering/october-2022/>

or higher destruction efficiency), the calculations in this application conservatively assume that only 98% of ammonia is destroyed at the flare. The 98% destruction is based on TCEQ flare guidance for volatile organic compounds with ammonia considered an "otherwise" chemical which defaults to 98% destruction. If calculations were to reflect a more accurate destruction efficiency of 99% or higher, emissions represented at the flare would be half of that currently being proposed. It is important to note that the modeling of ammonia emissions from the flare has demonstrated the safeguarding of both human health and the environment at the currently proposed, more conservative emission rates. Additionally, flaring of ammonia involves high-temperature oxidation, which would result in converting ammonia into less harmful substances such as nitrogen gas (an inert and unreactive gas) and water, eliminating any ammonia smell.

Comment 21: Federal Applicability

Commenters are concerned about the quantity of emissions that will result from the project and if the project requires federal review. Additionally, there are questions regarding the difference between minor and major designation.

(Samuel Y Alaniz, Sandra A Arizmendi)

RESPONSE 21: A Prevention of Significant Deterioration (PSD) major site is defined as a site emitting over 250 tpy of any one pollutant if it is an unnamed source or 100 tpy of any one pollutant if it is one of 28 sources named in 40 CFR § 52.21(b)(1)(a). Once it is determined a site is major, the project emission increases for each pollutant are compared to the applicable significant emission rate to determine if that pollutant requires PSD review. This site is a named source and has proposed emission rates less than 100 tpy of each pollutant, therefore, the project is not subject to PSD permitting.

Nonattainment New Source Review (NNSR) permitting is applicable for 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. Once it is determined a site is major, the project emission increases for each pollutant are compared to the applicable significant emission rate to determine if that pollutant requires netting. If the project's net emissions are greater than the netting threshold, the project is subject to NNSR permitting. The site is not located in a nonattainment county; therefore, the project is not subject to NNSR permitting.

Comment 22: Emergency/Evacuation

Commenters are concerned about the safety of the facility. They ask how neighbors would be notified in the case of an accident and whether there is an evacuation plan. Commenters express concern over other disasters involving ammonia and want to know what prevention is in place here.

(David Guzman, Miguel Gutierrez, Darci D Forrest, Mona Lisa Biberstein, Melanie Grant, Paul Pilarczyk, Brittany Donald, Patricia Kocurek, Tommy Dunlavy, Randy Light, Mona Lisa Biberstein, Lela Gutierrez, Benjamin Tyler, Oralia Womack, Thomas Forrest, Darci D Forrest, T Morgan, Marie Lucio, Chris Truax, Ivan Alvarez, Curtis Manning, Alma Marie Studer, Lorraine Morales, Anthony Vigue, Ester Maria Paredez, Kimberly Amy, Tanya Bergstrom, Polo Paredez, Jennifer Rivera, Patty Miller, Stefanie Simmons, Myra B Alaniz, Linda Ramirez, Larry Fuhrken, Mona Lisa Biberstein, Ruben Vela, Samuel Y

Alaniz, Rachel Caballero, Victor Digesti, Fred Wollmann, Aaron Gutierrez, Felix Trevino, Suzanne Gallagher, Tim Walz, Teresa Yates, Sara Dennis, Gary Burney, Carol Burney, David M Donald, Heidi Wangen Gutierrez, Fred Wollmann, Joanne Marquez, Bethany Santillan, Marie Lucio, Alvin Morin, Paisley Forrest, Victoria Sharpless, Gary Capeheart, Tanya Angely Garcia, Trudy L Perriraz, Frank Gomez, Omar Gomez, George F Picha, Marie Lucio, Charles Bockholt)

RESPONSE 22: TCEQ takes health and environmental concerns seriously. The proposed permit meets all federal and state regulatory requirements and is protective of human health and the environment. If you have been adversely impacted by emissions from the facility, you may file a complaint with TCEQ Corpus Christi Regional Office at (361)-881-6900 or by calling the 24-hour toll free Environmental Complaints Hotline at 1-888-777-3186).

In the event of an emergency, the Local Emergency Planning Committee and the regulated entity have the primary responsibility of notifying potentially impacted parties regarding the situation. In addition, as set forth in 30 TAC § 101.201(a), regulated entities are required to notify TCEQ regional office within 24 hours of the discovery of releases into the air and in advance of maintenance activities that could or have resulted in excess emissions.

Proposed projects which involve toxic chemicals that are known or suspected to have potential for life threatening effects upon off-facility property in the event of a disaster and involve manufacturing processes that may contribute to the potential for disastrous events, may require a disaster review for the application.

The applicant is required to have a Risk Management Plan on file with the U.S. EPA and TCEQ prior to the start of operations. The purpose of this plan is to identify the potential effects of a chemical accident, identify the steps the facility is taking to prevent an accident, and spell out emergency response procedures should an accident occur. The Risk Management Plan will address how events that can be considered will be responded to. There may be events which are so unexpected that a detailed response and consideration is not made. Reasonable efforts should be made by the owner/operator of the site.

A TCEQ NSR Permit does not authorize accidents.

The plan is not required prior to construction of the site as the Risk Management Plan is expected to follow how the site is built which may be different from early design intentions proposed for construction. Changes to the early design may need to be submitted to TCEQ for review and agreement prior to authorization depending on the significance of the change(s).

A Risk Management Plan was provided which will need to be modified with as built considerations. An updated version will be submitted to the EPA and TCEQ Region 12 prior to operation of the facility.

The applicant has made an effort to evaluate scenarios which would have the potential to result in an emergency event. They have then considered how the scenario could be avoided such as through the inclusion of safety redundancies and back up power supply. Although the TCEQ does not permit accidents/upset events, this should result in a reduction in the likelihood of emergency events occurring.

Comment 23: Environmental impact study

Commenters requested that an environmental impact study be conducted prior to authorization of this project.

(Sandra A Arizmendi, Donald Bailie, Cody Benavides, Macy Winchester, Renee Kozak, Abel Herrero, Connie Swetlick, Renee Kozak, Patricia Kocurek, Kimberlie Kaye Graley, Jennifer Gracia, Dennis L Denman, Ronald T Hellberg, James Cray Schanen, Kathleen Hurst, Rachel Garcia, Gary Capeheart, Doris Mcdermott, Dennis L Denman, Lorraine Morales, Martin Zurick, Elliott Dziuk, Maribel Trevino, Juan "Chuy" Hinojosa, Jeffrey Hunt, Norma Castaneda)

RESPONSE 23: Environmental Assessments and Environmental Impact Statements (EIS) are a specific requirement for federal agencies under the National Environmental Policy Act (NEPA). An EIS is not required for state actions such as this permit. However, both the TCAA and TCEQ rules provide for an extensive review of the application to ensure that emissions from the proposed facility will not violate the NAAQS and will not be expected to adversely affect human health or the environment. 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 as discussed in Response 1.

Comment 24: Application Incomplete

Commenters stated that the application is incomplete.

(Martin Zurick, Alma Marie Studer, Cathy Fulton, Holly Bockholt)

RESPONSE 24: 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 25: Environmental Justice

Commenters raised concerns regarding the environmental justice implications of this project.

(Dorothy Pena, David M Donald, Ruben Rodriguez, Gabriella Martinez, Arnoldo Gonzalez, Lorraine Morales, Patty Miller, Bruce K Hoelscher, Kathy Rokohl, Dennis L Denman, Marigail Reyna, Rebecca Martinez, Jennifer Pantoja, Eli Mckay, Alma Marie Studer, Adelita Cavada, Lorraine Morales, Rebecca Menn, Holly Bockholt, Amanda Sullivan, Martin Zurick, Kimberly Amy, Mary Rodriguez, Bette Cranford)

RESPONSE 25: Air permits evaluated by TCEQ are reviewed without reference to the socioeconomic or racial status of the surrounding community. 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.

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. You may contact the Office of the Chief Clerk at 512-239-3300 for further information. More information may be found on TCEQ website:

<https://www.tceq.texas.gov/agency/decisions/participation/title-vi-compliance>.

Comment 26: Corporate Profits

Commenters questioned the corporate profits made by this project at a cost to the surrounding community.

(Mallory Winchester, Alma Marie Studer, Alice T Ligon, Robert G Hernandez, Suzanne Gallagher, Yolanda Cruz, Lori Rosas, John E Foddrill, Tanya Bergstrom, Marigail Reyna, Laramie Fain, Adelita Cavada, Alma Marie Studer, Rowdy Bergstrom, Dennis L Denman)

RESPONSE 26: TCEQ is not authorized to consider a company's financial status nor its profits in determining whether a permit should be issued. TCEQ's review of this company's application included analysis of health impacts and application of best available control technology (BACT), and based on this review, the facility should comply with all applicable health effects guidelines and emission control requirements. Continued compliance with health effects guidelines and BACT requirements is expected if the company operates in compliance with the permit terms and conditions. Individuals are encouraged to report any environmental concerns at the facility by contacting TCEQ Corpus Christi Regional Office at (361)-881-6900 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. TCEQ evaluates all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action.

Comment 27: Demonstrate Compliance with Permit

Commenters asked how the Applicant will demonstrate compliance with the terms of their permit on a continuous basis.

(Socorro Ramos-Aviles, Connie Pilarczyk, Sandra A Arizmendi, Martin Zurick, Martin Zurick, Connie Pilarczyk, Victoria Sharpless)

RESPONSE 27: 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. Emissions will be monitored by supplier contracts, vent stream flow and composition monitoring, runtime meters, and Audio, Visual, Olfactory (AVO) inspections. The permit holder is also required to maintain records to demonstrate compliance, including the monitoring listed above. Records must be made available upon request to representatives of 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.

TCEQ evaluates all complaints received. If a facility is found to be out of compliance with the terms and conditions of its permit, it will be subject to investigation and possible enforcement action. Individuals are encouraged to report any concerns about

nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting TCEQ Corpus Christi Regional Office at (361)-881-6900 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law. The information, if gathered according to agency procedures and guidelines, can be used by TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from TCEQ Publications office at 512-239-0028 and may be downloaded from the agency website at <http://www.tceq.texas.gov> (under Publications, search for document number 278).

Comment 28: Inspections

Martin Zurick asked how often the facility will be inspected

RESPONSE 28: The Regional Office performs investigations of the plant on a regular schedule 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. Additional investigations will occur in response to complaints reported by contacting TCEQ Corpus Christi Regional Office at (361)-881-6900 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

Comment 29: Water Consumption and Waste Disposal

Commentors expressed concerns with waste disposal and water consumption/usage. Commenters expressed concern about drought and the ability of the applicant to get water.

(Paul Pilarczyk, Trudy L Perriraz, Amanda Sullivan, Connie Pilarczyk, Patricia Taber Jones, Letisia Avalos, Loss E Thomas, Amy Luna, Suzanne Haas, Bette Cranford, Miranda Luna, Thomas Perrigue, Kathy Ricks, Francis Eugene Youngblood, Darci D Forrest, Arnold Morin, Patricia Kocurek, Art Hinojosa, Jacquelyn Tleimat, Debbie Cleveland, John Cole Carrillo, Alma Marie Studer, Dennis L Denman, Darci D Forrest, Marybeth Horne, Donald Bailie, Aaron Gutierrez, Dennis L Denman, Michael M Saldana, Bethany Santillan, Patricia Kocurek, Gabriella Martinez, Demi Navarrete, Gary Burney, Carol Burney, Oscar Trevino, Albert Lee Studer, Marty De Los Santos, Audrey Cervantes, Alvin Morin, Michael Cleveland, Karen R Vaughan, Sheri Denman, Gaylon Krizak, Jeanette Krizak, Benny Perriraz, April Eddlemon, Malena Dawn Cocran, Bethany Santillan, Ronald T Hellberg, Leslie Barber, Sam Longoria, Javier O Franco, Tanya Bergstrom, Marlena Boatwright, Patricia Kocurek, Santiago Garcia, Richard Rodriguez, Juan Martinez, Myra B Alaniz, Kimberly Picozzi, Kimberlie Kaye Graley, Cassie Edwards, Shelby Gillihan, Blake Bocan, Candace Garcia, Monna Lytle, Laramie Fain, Carlos S Costilla, Crittenden, Crittenden, Eli Mckay, Trudy L Perriraz, Karen R Vaughan, Kathy Rokohl, Margot Moczygemba, Louise Cook, Sarah Bailie, Vanessa Cantu, Alice T Ligon, Lydia C Secrest, Thomas Forrest, Patricia Kocurek, Alma Marie

Studer, Patricia Kocurek, Phyllis Carrier, Rachel Caballero, Don Keiper, Blanca Parkinson, Jeanette Naranjo, Cheryl Majek, David M Donald, Cathy Fulton, Irma Gonzalez, Alexis King, Jeffrey Hunt, Martin Zurick, Patricia Eley, Suzanne Gallagher, Mike W Harvey, Renee Kozak, Arsilia Morin, Brianna Franco, Kendall Messer, Leeann Mota Garza, Reagan Ivey, Kimberly Sturgis, Odilia G Torrez, Joshua Kirkland, David Avalos, Melinda Carrasco, David Merritt, Juan S Garcia, Alvin Morin, Bruce K Hoelscher, Marcia Layton, Fred Wollmann, Darlene Lee, Victoria Sharpless, Bob Matthews, Ralph Green, Andrea Kiarra De Los Santos, Angel Serbantez, Joshua Samaniego, Ariel Vasquez, Maria Louisa Evans, Christine Valenzuela, Tracie Hatch, Maryann Markert, Victoria Sharpless, Judy Hernandez, Laura Camarena, Janie Aleman, Jim Morgan, Roberto G Hernandez, Chloe Villarreal, Coastal Bend Sierra Club (James E Klein), Patricia Kocurek, Clifford Anderson, Renee Kozak, Maria E Garcia, Judy Shurley, Joanne Marquez, Joe Villarreal, Kimberly Sigala, Deborah Donald, Phyllis Carrier, Laura Hernandez, Emily Hernandez, Melissa Beltran, Suzanne Gallagher, Matt Chapman, Mona Lisa Biberstein, Sonja Cedillo, Janie Dugger, Bruce Dugger, Bianca Martinez, Melissa M Ducote, Joe Koniakowsky, Stephanie Ponce-Perales, Ruben Vela, Amanda Davis, Patricia Kocurek, Abel Herrero, Melissa Hughson, Deborah Kocurek Eckel, Tanya Bergstrom, Mark Muenster, Jody Messer, Carolyn Walter, Patricia Kocurek, Laramie Fain, Judy Kestner, Mackenzie E, Suzanne Gallagher, Amanda Galvan, Anita Reed, Kasi Valle, Mike W Harvey, Suzanne Gallagher, Tim Walz, Michael Adams, Brianna Franco, Marissa Valenzuela, Abel Herrero, Eduardo Beltran, Dennis Craig Jones, Bobbie Evans, Jerry Jernigan, Betty Jernigan, Martin Zurick, Raquel Valenzuela, Maggie Peacock, Autumn Hensiek-Fain, Holly Bockholt, Ruby Ann Lara, Kimberly Castaneda, Mandilea Sykora, Richard C King, Gary Capeheart, Rachel Garcia, Marissa Gamboa, Lorraine Morales, Chelsea Hodges, Gilberto Espinoza, Travis J Zurick, Jennifer Zurick, Juliette Nisbet, Ruben Rodriguez, Ryan W Mcnabb, Concerned Citizen, Beatriz Alvarado, Jeanessa Escamilla, Sandra A Arizmendi, Yolanda Hernandez, Emma Martinez, Deborah Donald, Floyd Gonzalez, David M Donald, Felix Trevino, Cheryl Green, Jane Longoria, Randy Stanton, Thomas Forrest, Christina Nelson, Lauren Mcnabb, Elida I Castillo, Aline Trejo Chavez, Maegan Morales, Phillip Evans, Blessing Willesden, Dennis L Denman, Angela Hernandez, Dalia L Burton, Tandi Rasmussen, Angela Marroquin, Cody Benavides, Tina G Del Gallo, Fred Wollmann, Joshua Taylor, Alexis King, Karen Frederick, Mckenzie Hahn, Adrienne Kerr, Alma Marie Studer, Fernando Hernandez, Diane Rojas, Monica R Kirkland, Misty Villarreal, Thomas Mullenix, Paisley Forrest, Patricia Kocurek, Cameron Zarate, Jeanette Hughes, George F Picha, April Garza, Doris Mcdermott, Lilly C Smith, Ashley Morgan, Beth Hartman, Connie Swetlick, Marigail Reyna, Sharon Bush, Leanne Lhironnelle, Betty Schiro, David Yepez, Rosalinda Otero, Yolanda Morin, Patricia Kocurek)

RESPONSE 29: Although 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.

Water rights, in this case, are through the Nueces County Water Control and Improvement District. This permit limits production of anhydrous ammonia and associated emissions to the air. As water is a raw material, there is a limit to the maximum amount water that can be used. The issuance of their permit does not

guarantee that the site can acquire the water from the Nueces County Water Control and Improvement District through this permit authorization.

Comment 30: Energy Consumption

Commentors expressed concerns with energy consumption, including stress on water, electricity, and sewage. Commenters expressed concern about impacts of the proposed project on the Texas power grid.

(Aron Miller, Patricia Kocurek, Elida I Castillo, Bruce K Hoelscher, Melissa Hughson, Barbara Schroeter, Phyllis Carrier, Bruce K Hoelscher, Paisley Forrest, Angel Serbantez, Cathy Fulton, Mona Lisa Biberstein, Francis Eugene Youngblood, Darci D Forrest, Alma Marie Studer)

RESPONSE 30: Although 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 energy consumption are not within the scope of this review. These concerns are typically the responsibility of local, county, or other state agencies, such as the Public Utilities Commission.

The site will require a specific amount of energy. This permit is not authorizing production of electricity or refining of natural gas. The owner or operator is not guaranteed by this permit authorization that resources will be available to provide the energy required. It will be incumbent on the site to acquire the energy from available and authorized resources separate from this authorization.

Comment 31: Tax Abatements

Commentors expressed concerns with tax abatements that benefit the company if the plant was built in the proposed location.

(Lydia Secrest, Margot Moczygomba, Tanya Bergstrom, Alma Marie Studer, Amanda Sullivan)

RESPONSE 31: TCEQ does not offer tax abatements to companies for building in specific areas within the State. Rather, it is in the jurisdiction of the local government to offer tax abatements.

Comment 32: Public Hearing/Meeting and Contested Case Hearing Requests

Commentors requested a public meeting to discuss concerns about the proposed air permit. Commentors also requested a contested case hearing. Commenters expressed concern and confusion over who is eligible for a contested case hearing, and whether they must live within one mile of the facility.

(Joshua Samaniego, Suzanne Gallagher, Darci Forrest, Kim Frost, Myra Alaniz, Abel Herrero, Jamie Richard, Yolanda Morin, Michelle Guajardo, Ryan Lawhorn, Alma Marie Studer, M Randy, James Richard, Bianca Martinez, Nancy Alvarado, Alvin Morin, Denise Otahal, Deanna Contreras, Pablo Contreras, Anita Contreras, Jason Hale, Phyllis Carrier, Matilda Herrero, Ginger Martinez, Tara Peredez, Trudy Perriraz, John Carrillo, Sandra Arizmendi, Amanda Breland, Karen R Vaughan, Holly Bockholt, Jennifer Garcia, Kimberly Castaneda, Michael Castaneda, Kelly Jo Carillo, John Cole Carillo, Edward John Marez, Deborah Donald, Elizabeth Zurick)

RESPONSE 32: A public meeting was held at 7 pm on July 29th, 2024, at the Richard M. Borchard Regional Fairgrounds Conference Center. The public meeting allowed the opportunity for the community to ask TCEQ and Nueces Green Ammonia questions about the proposed air permit and leave formal comments.

TCEQ acknowledges receipt of timely contested case hearing requests. The review will be presented to TCEQ Commissioners for determination of whether a hearing should be granted unless the applicant requests direct referral to the State Office of Administrative Hearings (SOAH).

Comment 33: Cumulative Effects and Emissions Inventory

Commentors have expressed concerns about the cumulative impacts from this plant in addition to surrounding plants in the area.

(Patricia Kocurek, Myra Alaniz, Dorothy Pena, Tanya Bergstrom, Samuel Alaniz, Connie Pilarczyk, Amanda Breland, Jason Hale, Mark Muenster, Paul Pilarczyk, Dawn Cunningham, Martin Zurick, Autumn, Hensiek-Fain, Bette Cranford, James Klien, Elizabeth Zurick)

RESPONSE 33: 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.

As mentioned in Response 1, an impacts analysis was conducted for nitric oxides, carbon monoxide, particulate matter, sulfur dioxide, ammonia, and diesel fuel. 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. Nitric oxides, particulate matter less than 2.5 microns in diameter, and sulfur dioxide were the only pollutants with concentrations greater than de minimis levels. Therefore, a full NAAQS analysis was performed for those pollutants to account for cumulative effects by including an evaluation of all on-property sources, applicable off-property sources, and representative monitored background concentrations.

Per 30 TAC Part 1 Chapter 116 Subchapter B §116.111(a)(2)(J) computerized air dispersion modeling may be required by the executive director to determine air quality impacts from a proposed new facility or modification. The Air Permit Reviewer Reference Guide (APDG 6110) Air Pollution Control - How to Conduct a Pollution Control Evaluation; Section IV - Specific Control Evaluations; BACT and Impacts Evaluation; clarifies that "(a)n off-property impacts evaluation is required for all NSR projects involving BACT."

This impacts evaluation may use screening tools or refined air dispersion modeling. The guide further states that the modeling will consider all emissions from the proposed facility, including both point and fugitive sources. The acceptability of the impact's evaluation is determined by comparing the air dispersion modeling predicted emission concentrations from the proposed facility to appropriate state and federal standards, de minimis levels, or health effects guidance levels. The applicant followed these requirements in determining the impacts from this plant. Current rules and guidelines for the impacts require no further evaluation.

Comment 34: By Products/CO₂

Commentors expressed concerns about byproducts of the green ammonia synthesis process, CO₂ (Carbon Dioxide) in particular.

(Larry Fuhrken, Jeanette Krizak)

RESPONSE 34: This air permit only authorizes the production of ammonia and does not authorize production of any byproducts resulting from the synthesis of green ammonia. However, when streams are combusted at the flares, there is the potential for secondary pollutants to be formed due to the incomplete combustion of natural gas. This combustion can form carbon monoxide and nitric oxides. It should be noted that emissions from the combustion of pipeline quality natural gas have been reviewed by TCEQ Toxicology Division as specified in Appendix B of the Modeling Effects and Review Applicability (MERA) Guidance for health effects and are not expected to cause adverse health effects.

When referring to the ammonia production process, it is important to understand the different types of process seen throughout industry. Brown ammonia is ammonia produced through the Haber-Bosch process and uses fossil fuels as a feedstock for the hydrogen needed to make ammonia. CO₂ is a common byproduct produced when synthesizing brown ammonia. Green ammonia is ammonia produced through the reaction of hydrogen gas generated through electrolysis with nitrogen gas produced from an air separation unit. The synthesis of green ammonia does not use fossil fuel feedstocks and does not produce a carbon dioxide waste stream. However, carbon dioxide can form from the combustion of natural gas at the flare.

The chemistry proposed for this green ammonia site has the only potential source of CO₂ emissions being combustion at the flare. The CO₂ due to combustion is an indication of complete combustion resulting in hydrocarbons being emitted as water and CO₂ rather than incomplete combustion resulting in hydrocarbons from the natural gas being emitted.

Comment 35: Ammonia Production Capacity

Commentors have expressed concerns about the capacity of ammonia produced.

(Fred Wollmann, Larry Fuhrken)

RESPONSE 35: Nueces Green Ammonia has represented in their permit application that the proposed plant would produce 320 million gallons (approximately 805,200 metric tonnes) of anhydrous ammonia per rolling 12-months.

During the technical review of the application, an inconsistency was found in the representation for how many gallons of anhydrous ammonia the facility was to be authorized to produce. The applicant provided an explanation and correction to the representation during the special condition negotiations. As a liquid product, negotiations included whether the production capacity should be limited based on volume (gallons) or mass (metric tons). It was determined that making the limit based on mass would be more appropriate and a better means of ensuring the site stayed under the represented production rate. This production rate limit is referenced in Special Condition No. 5 of the draft Special Conditions.

Comment 36: Map Issues

Commentors expressed concerns about map issues for the submitted maps in the permit application. Specifically, there were concerns that surrounding houses were "removed" from the submitted map images.

(Connie Pilarczyk, Patricia Kocurek, David Donald)

RESPONSE 36: TCEQ requires all applications to include an official area map with an accurate graduated scale, the entire plant boundary, the location of the property relative to prominent geographical features including but not limited to, highways, roads, streams, and significant landmarks such as buildings, residences, schools, parks, day care centers, and churches. The map submitted in this permit application was verified to be consistent with current Google geographical maps.

Comment 37: Pipeline

Commentors have expressed concerns with the construction of the proposed pipeline that will transfer anhydrous ammonia product offsite.

(Jared Bockholt, Tanya Bergstrom, Bruce Hoelscher, Martin Zurick)

RESPONSE 37: TCEQ does not have authority to authorize construction or regulate operation of pipelines throughout the state. The Railroad Commission of Texas regulates pipelines through the issuance of a T-4 pipeline permit. The applicant must meet the requirements found in 16 Texas Administrative Code § 3.70 to obtain a T-4 pipeline permit.

Comment 38: Ammonia Air Emissions Polluting Water/Soil

Commentors have expressed concerns with ammonia air emissions polluting water and soil in the surrounding area.

(Ruben Vela, Kandyce Bergman, Sister Eileen Doherty, Sister Patricia Burns, Myra Alaniz, Samuel Alaniz, Marie Studer, Suzanne Gallagher, Alvin Morin)

RESPONSE 38: Ammonia occurs naturally and is produced by human activity. Ammonia is found throughout the environment in the air, soil, and water, and in plants and animals including humans. It is an important source of nitrogen, which is needed by plants and animals. Bacteria found in the intestines can also produce ammonia. Ammonia does not last very long in the environment because it is rapidly taken up by plants, bacteria, and animals. In addition, ammonia does not build up in the food chain but serves as a nutrient for plants and bacteria.

Everyone is exposed to low levels of naturally occurring ammonia in air, food, water, and soil. You may be exposed to higher levels if you use household cleaning products containing ammonia (such as window cleaners), if you apply ammonia fertilizers or live near farms where these fertilizers have been applied, or if you go into enclosed buildings that contain lots of animals (such as on farms).

For more information on the impacts on flora and fauna see Response 3.

Comment 39: Odor

Commentors have expressed concerns with the potential odor associated with ammonia.

(Kandyce Bergman, Kimberly Castaneda, Judy Hernandez, David Avalos, Cassie Edwards, Angela Hernandez, Ty Laner, Richard Rodriguez, Darlene Lee)

RESPONSE 39: Ammonia has a strong sharp and unpleasant odor. Some household cleaning products contain ammonia, and you can smell ammonia while using these products. The odor threshold that TCEQ uses for air permitting is $3,670 \mu\text{g}/\text{m}^3$. However, people with a more sensitive sense of smell may detect ammonia at lower concentrations, and others with a less sensitive sense of smell may detect ammonia at higher concentrations. The purpose of TCEQ odor threshold for air permitting is to prevent odor nuisance conditions, rather than prevention of odor detection.

Ammonia is also naturally occurring in the atmosphere and is used by plants as a source of nitrogen. However, at high concentrations (at least $2,030 \mu\text{g}/\text{m}^3$) ammonia can cause direct toxic effects on the leaves of plants. The modeled concentrations of ammonia from the Nueces Green Ammonia plant ($100 \mu\text{g}/\text{m}^3$) are much lower than the ammonia odor threshold ($3,670 \mu\text{g}/\text{m}^3$) and the concentrations shown to produce damage to leaves of plants ($2,030 \mu\text{g}/\text{m}^3$). Therefore, this facility is not expected to cause any nuisance odor conditions or adverse effects on nearby plants.

Should an odor be of nuisance to the community, complaints regarding odors or operation of the facility can be made to TCEQ Corpus Christi Regional office. Additionally, Special Condition 24 was inserted into the Special Conditions of the permit to highlight the responsibility of NGA when an odor complaint is received. NGA is required to comply with 30 TAC § 101.4 regarding odor nuisance. Once an odor nuisance condition is confirmed, appropriate action shall be implemented to control nuisance-causing emissions either through process controls or additional emission controls.

Comment 40: Power Outages

Commentors have expressed concerns with the potential for adverse effects to occur if the plant were to lose power.

(Myra Alaniz, Bruce Hoelscher)

RESPONSE 40: The possibility of a power outage should be addressed in the Risk Management Plan required before the plant starts operation. As part of the process of evaluating and planning for this possibility, the Nueces Green Ammonia plant has proposed onsite emergency engines to operate as the primary power source. Emissions from these engines are only authorized for testing purposes to ensure they will operate when needed. The applicant has proposed to operate two (2) emergency engines each rated at 2,690 horsepower. For comparison, a typical engine that powers a common sedan would be rated between 200 and 300 horsepower. Additionally, the proposed facility would operate a 2,000-gallon diesel storage tank to ensure there is enough fuel for a prolonged power outage.

Depending on the duration and reason for the loss of power, appropriate measures to reduce or stop production, if necessary, should be safely implemented with the power provided by the emergency engines. This would be more fully evaluated in the final Risk Management Plan and goes beyond the scope of what the permit authorizes which is routine and planned (prescheduled) maintenance, startup, and shutdown emissions. A power outage would not reasonably be considered planned startup or shutdown.

Comment 41: Modeling Validity

Commentors expressed concerns regarding the validity of the modeling. Specifically, the radius of the modeling, wind conditions, and if other sources in the area were taken into account.

(Marie Lucio, Jennifer Garcia, Buddy Toepfer, Bruce Hoelscher, Jennifer Garcia, Bobby Hinds, Jason Hale)

RESPONSE 41: The applicant is required to conduct an air quality analysis (air dispersion modeling analysis) to demonstrate the proposed permit will be protective of human health and the environment. The air quality analysis started at the applicant's property boundary and extended out to 10 kilometers in all directions from the locations of the sources at the proposed facility. TCEQ Air Dispersion Modeling Team (ADMT) conducted a modeling audit of the applicant's air quality analysis and concluded the analysis has sufficient spatial coverage and density to determine the maximum predicted ground-level concentration in all areas of ambient air. Overall, the ADMT determined the air quality analysis is consistent with TCEQ guidance and is acceptable.

For this specific application, the applicant conducted an air quality analysis (air dispersion modeling analysis) to demonstrate the proposed permit will be protective of human health and the environment. The air quality analysis was conducted using TCEQ pre-processed meteorological data for Nueces County. The TCEQ pre-processed meteorological data consists of several meteorological parameters on an hourly basis. The model will simulate the maximum allowable emissions from all sources emitting simultaneously for each hour of the year. The meteorological data accounts for all variations in meteorological conditions for the year and captures the worst-case meteorological conditions expected across the modeling domain. Additionally, the modeling demonstration accounts for changes in topography across the model domain by incorporating terrain data from the United States Geological Survey (USGS). The maximum predicted ground-level concentration is the worst-case representation considering emissions data, meteorological data, and topography. The TCEQ Air Dispersion Modeling Team (ADMT) conducted a modeling audit of the applicant's air quality analysis and concluded the analysis has sufficient spatial coverage and density to determine the maximum predicted ground-level concentration in all areas of ambient air. Overall, the ADMT determined the air quality analysis is consistent with TCEQ guidance and is acceptable. The model predicted concentrations at all locations outside the property boundary will be protective of human health and the environment

Modeling was only conducted for the emissions from this plant as this site is not subject to PSD permitting (see Response 21). PSD permitting requires a more rigorous review of modeling which considers other sources in the area. While this was not required for this project, 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. See Response 1 for a more detailed explanation of how background concentrations were utilized when analyzing potential health effects in this application.

Please note that TCEQ does not authorize emission events or upsets. Therefore, modeling for these scenarios were not performed.

Comment 42: Application Translation

Commentors have expressed concerns regarding a Spanish translation of the entire application not being available at the public viewing location.

(Holly Bockholt)

RESPONSE 42: While TCEQ requires the applicant to provide a translated copy of the Notice of Receipt of Application and Intent to Obtain Permit (NORI), Notice of Application and Preliminary Decision for an Air Quality Permit (NAPD), and the Plain Language Summary (PLS), TCEQ does not require applicants to provide translated application documents per 30 TAC § 39.603.

In addition to the requirements of appropriate translated documents listed above, TCEQ has recently implemented several measures to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in any program receiving federal financial assistance. TCEQ has implemented the following:

- A Language Access Plan to ensure that limited English proficient (LEP) communities can participate meaningfully in its programs and activities. The agency now requires permit applicants to provide translated notice packages, ensuring that translations can be posted on the agency website in a timely fashion, regardless of if there is no suitable alternative language newspaper.
- A Public Involvement Plan (PIP) which is a tool that requires an evaluation of the communities in which certain activities are expected to occur.
- New comment software for accepting comments on rulemaking and similar projects. This software allows the agency to provide information on these projects in both English and Spanish. It translates comments received in other languages and can translate the agency's response to comments into Spanish.
- Interpretation at agency meetings is now being provided as well as translated information about the content of the meetings.
- Improvement of Agency Grant Programs such as Texas Emissions Reduction Program (TERP), which is an agency program that provides grants to the public. TERP hired a dedicated bilingual staff member to manage outreach activities for the program. TERP documents that have been translated into Spanish include request-for-grant applications, mock contracts, webinar and workshop presentations, letters, booklets, and other documents and materials to help Spanish language communities learn about TERP programs and how to apply for grants.

Comment 43: Validity of Technical Review

Commentors have expressed concerns regarding the validity of TCEQ's review of the application material. Commentors expressed concern about inclusion of emissions from maintenance, startup, and shutdown in the technical review.

(Tanya Bergstrom, Myra Alaniz, Martin Zurick, Tanya Garcia, Sandra Arizmendi,

Victoria Sharpless, Jason Hale)

RESPONSE 43: The proposed project was extensively reviewed, and it was determined by APD staff and management that the application meets all permitting requirements of the Texas and Federal Clean Air Acts. Nueces Green Ammonia has demonstrated in their application that they will meet Best Available Control Technology (BACT), National Ambient Air Quality Standards (NAAQS), and TCEQ Effects Screening Levels (ESLs). BACT is a control standard mandated by the Federal Clean Air Act, administered by the EPA, and required by 30 TAC 116.11(a)(2)(C) to be applied to all facilities subject to the Texas Clean Air Act (TCAA). BACT ensures that new or modified sources implement the most effective control measures available to minimize their environmental impact. A full BACT review that details the technology used can be found in the Technical Review document for this application. NAAQS standards and TCEQ Effects Screening Levels are limits set by the US EPA and TCEQ Toxicology division to regulate atmospheric concentrations to protect public health and the environment.

Additionally, calculations submitted by the company were reviewed and determined to meet or were shown to be more conservative than the appropriate calculation methodology required by TCEQ. The calculation methods used to estimate the emissions have been proven to overestimate the emissions (be conservative in assuring the protection of the area beyond the property line). Additionally, monitoring requirements were included to ensure the routine and planned maintenance, startup, and shutdown emissions would be complied with. The monitoring will also assist the site as an early warning of possible upset emissions which are not authorized.

Comment 44: Monitoring of Units

Commentors have expressed concerns with the amount of appropriate monitoring as well the validity of the company being able to "self-monitor." There are also specific concerns with monitoring of the refrigerated storage tank.

(Tanya Bergstrom, Victoria Sharpless, Jason Hale, Martin Zurick)

RESPONSE 44: TCEQ requires all companies with NSR Permits to monitor emissions or parameters (such as flow rate, temperature, pressure, concentration, and/or other reasonable physical traits) and associated sources that have the potential to emit to the atmosphere to be able to determine actual emissions. This permit requires Nueces Green Ammonia to perform the following monitoring requirements:

- Records of maintenance and vendor guarantees for performance and compliance of emergency engines are to be kept onsite.
- Ultra Low Sulfur Diesel used for the emergency engines shall be sampled every six months to determine total sulfur and net heating value.
- Pilot flame for the flares shall be continuously monitored by a thermocouple, infrared monitor, or ultraviolet monitor.
- A continuous flow monitor and composition analyzer are to be installed to record the vent stream flow and composition to the flares. An accepted alternative to the composition analyzer is a calorimeter to measure and record the net heating value of the vent gas sent to the flares.
- Hourly mass emission rates for the flares shall be determined and recorded

using the monitoring data collected.

- The cooling tower's drift eliminators are to be inspected annually, and records of inspection/repairs are to be maintained.
- Particulate emissions from the cooling tower will be tracked and determined based on the total dissolved solids (TDS) concentration in the circulated cooling water and design efficiency of the cooling tower drift eliminators.
- The actual cooling water circulation rate of the cooling tower shall be measured at least hourly.
- The NH₃ associated with the cooling tower water shall be monitored monthly with an air stripping system.

Gas detectors or Electrochemical sensors shall be installed on the outside of the cooling tower to measure NH₃ concentration in the air. Indications of an increase in NH₃ concentration detected by more than 2 ppm on average in a 24-hour block period shall start an investigation to determine the source.

- The permit holder shall maintain a record of tank throughput for the previous month and the past consecutive 12-month period for each tank.
- Fugitive components shall meet 28AVO LDAR Program monitoring requirements.

These monitoring requirements ensure that the company can properly and accurately report their emissions to Emissions Inventory. If monitored rates exceed emission rates authorized on the Maximum Allowable Emission Rates Table (MAERT), the company is subject to an enforcement action. TCEQ regional staff will inspect the site to ensure monitors are in place and operating as intended. The inspections will also ensure that data is being retained to support the required reporting. This has proven reasonable to ensure that the correct self-monitoring is being implemented and encourages companies to report issues rather than waiting for a site visit to find problems.

Temperature monitoring for the refrigerated ammonia storage tank was inadvertently not included in these special conditions for NSR Permit No. 174951. As a result of the concerns for this monitoring, the draft special conditions have been revised to include temperature monitoring for the refrigerated ammonia storage tank. Even without the temperature monitoring, the permit special conditions and allowable emission rates ensured that any NH₃ vapors generated in the tank due to exceedances of the intended temperature would be captured, compressed back into liquid form, and returned to the tank. No emissions to the atmosphere are authorized from the ammonia storage tank. Proper operation of this system would require temperature monitoring by the site even without it being included in the special conditions. However, in response to this comment, Special Condition No. 21 has been added.

Comment 45: General Opposition

Commentors expressed opposition to permit or made comments not pertaining to the facility.

(Aron Miller, Jennifer Marie Littlejohn, Yolanda Morin, Doug Posey, Robert Hernandez, Christina Nelson, Abigail Rosenberg, Isabel Araiza Ortiz)

RESPONSE 45: The Executive Director acknowledges the concerns of the citizens. The TCEQ appreciates the comments and interest from the public in environmental matters before the agency and acknowledges the comments in opposition of the project. As stated previously, the TCEQ reviews all applications consistent with applicable law and the TCEQ's regulatory authority. The Executive Director's staff has reviewed the permit 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. As stated in previous responses, 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.

For further questions related to the permitting process, the Office of Public Interest Counsel can be reached at 512-239-6363.

CHANGES MADE IN RESPONSE TO COMMENT

In response to public comment, the Executive Director has changed certain provisions of the draft permit. These changes and the reasons for these changes are more fully described above.

Respectfully submitted,

Texas Commission on Environmental Quality

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