

May 19, 2017

Texas Commissions on Environmental Quality  
Ms. Holly Landuyt, MC-165  
P.O. Box 13087  
Austin, Texas 78711-3087  
Via email to: [monops@tceq.texas.gov](mailto:monops@tceq.texas.gov)

Dear Ms. Landuyt:

The following comments are provided by Portland Citizens United, an active grassroots organization that was formed primarily to oppose the construction of the new EXXON/SABIC petrochemical facility that is currently seeking air and water permits to operate just beyond the city limits of Portland. Since its formation just eight months ago, our advocacy has extended beyond this single facility to include a broader approach and critical analysis of the industrial growth encroaching upon Portland and neighboring communities and the impact of this unprecedented growth to the quality of our air, and concomitantly, our health and quality of life.

Many citizens in San Patricio County are concerned about the lack of and need for ambient air monitoring on the north side of Nueces Bay within the Corpus Christi Urban Airshed. While considering the Port of Corpus Christi industries to the south, in addition to the recent industrial growth in San Patricio County along Corpus Christi Bay, the predominant south, southwest, and southeast winds position the cities of Gregory, Portland, Ingleside, and Taft downwind of many industrial pollutant point sources while lacking ambient air monitoring by TCEQ. The Texas Commission on Environmental Quality 2017 Annual Monitoring Network Plan does not contain any ambient air monitors in San Patricio County.

The attached chart shows the reported or permitted annual amount of pollutants emitted in San Patricio County along Corpus Christi Bay as well as the point source proximity to schools and housing. The elementary schools in Gregory and Portland are directly downwind from pollutants as well as homes in the communities (IE: Bay Ridge and Northshore subdivisions). It is in the public interest that ambient air monitors are placed in areas that can detect CO, NO<sub>x</sub>, and PM. We request that air monitors are appropriately sited for both health effects evaluations and evaluation of ozone precursor emissions. Air monitors provide relevant data to assess concentrations in a populated area as well as vulnerable populations such as children.

According to the *Texas Five-Year Ambient Monitoring Network Assessment-2015*, since the last five-year network assessment, no significant changes to the ozone monitoring networks have occurred and there are no NO<sub>x</sub> monitors in the Corpus Christi Airshed. In the proposed 2017 Annual Monitoring Network Plan there appears to be no planned monitoring of the emissions in San Patricio County. Considering new industrial construction and wind direction and noting that NO<sub>x</sub> is a contributor to PM<sub>2.5</sub> and ozone formation, a NO<sub>x</sub> monitor in San Patricio County would aid in achieving established monitoring objectives. According to modeling contained in the Corpus Christi Liquefaction permit, predicted NO<sub>x</sub> concentrations exceed the PDS NAAQS and extend northwest of the facility past the fence line. The Radius of Impact was rounded up to 5.5 miles. The subdivision of Bay Ridge, East Cliff Elementary school and Stephen F Austin Elementary school are all northwest of the CCL facility and at a distance of 1.37 miles, 1.68 miles, and 2.29 miles, respectively.

PM<sub>2.5</sub> is measured at three sites in the Corpus Christi area and not in San Patricio County. The TCEQ currently operates a monitor at the Corpus Christi Huisache site and a continuous monitor at the Dona Park site. In addition to these monitors, a supplemental speciation monitor is located at the Dona Park site and a continuous PM<sub>2.5</sub> monitor is located at the National Seashore site. In light of the recent large amount of fine, metallic particles being deposited in the Bay Ridge and Northshore subdivisions and the TCEQ investigation, installing a real-time fine particle PM<sub>2.5</sub> monitor would enable TCEQ to estimate benzo-alpha-pyrene emissions and other PAHs known to be present in soot emissions. The subdivision of Bay Ridge, East Cliff Elementary school and Stephen F Austin Elementary school are northwest of the Voestalpine facility and at a distance of 0.75 miles, 1.03 miles, and 2.16 miles respectively. The Northshore subdivision is 0.6 miles from Voestalpine. Voestalpine maximum allowable emission for CO is 4308.8 TPY.

As additional air permits in San Patricio County are being sought by heavy industry at a rapid rate, the air around existing populations encompassed by these facilities should be closely monitored for air pollutants by the Texas Commission on Environment Quality to “protect our state's public health and natural resources consistent with sustainable economic development. Our goal is clean air, clean water, and the safe management of waste”, too.

Respectfully submitted,  
Portland Citizens United  
*Errol A Summerlin*  
By: Errol A. Summerlin  
1017 Diomede  
Portland, Tx. 78374  
(361) 960-5313  
summerline@verizon.net

cc: Senator Judith Zaffirini  
cc: Representative J.M. Lozano

**SUMMARY OF POLLUTANTS EMITTED ANNUALLY IN EAST SAN PATRICIO COUNTY**

| TCEQ<br>REGISTRATION<br>NUMBER | COMPANY                      | SITE           | CO TPY | Nox TPY | PM 10<br>TPY | PM 2.5<br>TPY | SO2<br>TPY | VOC<br>TPY | MILES<br>TO EAST<br>CLIFF<br>ELEM | MILES<br>TO BAY<br>RIDGE | MILES<br>TO SF<br>AUSTIN<br>ELEM | MILES TO<br>NORTH<br>SHORE |
|--------------------------------|------------------------------|----------------|--------|---------|--------------|---------------|------------|------------|-----------------------------------|--------------------------|----------------------------------|----------------------------|
| RN102203445                    | GULF MARINE FAB INC          | SOUTH YARD     | 2.298  | 10.664  | 6.074        | 3.113         | 0.706      | 12.1259    |                                   |                          |                                  |                            |
| RN101623254                    | CHEMOURS CO FC LLC           | CHEMOURS       | 6.2874 | 9.5974  | 1.7777       | 1.7395        | 0.2237     | 8.1517     |                                   |                          |                                  |                            |
| RN102594678                    | SOUTHCROSS GATHERING LTD     | GREGORY        | 112.05 | 100.16  | 4.8591       | 4.8591        | 0.3474     | 41.6797    |                                   |                          |                                  |                            |
| RN102318847                    | SHERWIN ALUMINA CO LLC       | SHERWIN PLAN   | 148.72 | 32.3801 | 124.7641     | 41.2472       | 13.663     | 40.316     |                                   |                          |                                  |                            |
| RN100222744                    | FLINT HILLS RESOURCES CC LLC | INGLESIDE TERI | 15.482 | 17.5529 | 1.5643       | 1.3598        | 0.0466     | 45.2087    |                                   |                          |                                  |                            |
| RN100211176                    | OCCIDENTAL CHEMICAL CORP     | INGLESIDE PLA  | 100.14 | 524.844 | 101.4462     | 38.8672       | 2.2898     | 42.4926    |                                   |                          |                                  |                            |
| RN102547957                    | GREGORY POWER PARTNERS LP    | GREGORY POW    | 30.06  | 499.35  | 133.0789     | 130.657       | 9.3816     | 4.9218     |                                   |                          |                                  |                            |
| RN102582392                    | CANTERA ENERGY LLC           | EAST WHITE PC  | 3.5825 | 59.01   | 0.01         | 0.01          | 0.001      | 10.2092    |                                   |                          |                                  |                            |
| RN102905064                    | KIEWITT OFFSHORE SER LTD     | FABRICATION Y  | 0      | 0       | 0.756        | 0.1174        | 0          | 33.0294    |                                   |                          |                                  |                            |
| RN105835318                    | EOG RESOURCES INC            | NUECES BAY     | 4.7835 | 11.9159 | 0.0969       | 0.0969        | 0.0083     | 14.1777    |                                   |                          |                                  |                            |
| RN106408628                    | XTO ENERGY INC               | MCKAMEY TAN    | 10.06  | 6.8074  | 0.15         | 0.15          | 0.0093     | 11.9443    |                                   |                          |                                  |                            |
| RN106224447                    | TPCO AMERICA CORP            | TPCO TX        | 1.429  | 1.704   | 0.129        | 0.129         | 0.0735     | 0.093      | 2.25                              | 1.48                     | 0.77                             | 2.39                       |
| RN104104716                    | CC LIQUEFACTION LLC          | GREGORY        | 505.36 | 418.49  |              | 4.82          | 9.62       | 48.47      | 1.68                              | 1.37                     | 2.29                             | 1.37                       |
| RN106597875                    | VOESTALPINE                  | LA QUINTA      | 4308.6 | 394.51  | 63.53        | 33.51         | 34.82      | 35.76      | 1.03                              | 0.75                     | 2.16                             | 0.6                        |
| <b>TOTAL</b>                   |                              |                | 5248.8 | 2086.98 | 438.2362     | 260.676       | 71.191     | 348.58     |                                   |                          |                                  |                            |

DATA FROM COMPANIES 1-12 WERE SELF-REPORTED EMISSIONS IN 2015

CCL (CHENIERE) DATA IS EMISSIONS PROJECTED FROM MODELING IN PERMIT IN 2014

VOESTALPINE DATA IS MAXIMUM ALLOWABLE EMISSION IN PER 2016