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July 30, 2010

Mr. Michael Parrish
Office of Legal Services, MC 205
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

via TCEQ eComments

Re: Rule Project No. 2010-007-116-PR (Flexible Permit rulemaking)

Dear Mr. Parrish:

These comments address the proposed amendments to 30 TAC § 116.13 (definitions) and 30 TAC §§ 116.711 – 116.765 (the main Flexible Permit rules). The comments are offered on behalf of Environment Texas, Sustainable Energy and Economic Development Coalition, Sierra Club – Lone Star Chapter, Texas Environmental Justice Advocacy Services, Air Alliance Houston, Public Citizen Texas, Environmental Defense Fund and the Environmental Integrity Project.

TCEQ's existing Flexible Permit rules have been used by regulated entities to circumvent federal Clean Air Act requirements, and the U.S. EPA has recently disapproved these rules for inclusion as part of the Texas SIP. While the TCEQ's new proposed Flexible Permit rules appear to address some of EPA's stated concerns, the proposed rules still fail to meet federal Clean Air Act standards and are not approvable as part of the Texas SIP.

If adopted by TCEQ, the proposed Flex Permit rules will continue to put Texas industrial sources at risk of violating the Clean Air Act, because Flex Permits cannot and should not be used in lieu of federal major or minor new source review permits.

I. GENERAL COMMENTS

We acknowledge TCEQ's statements that the proposed rules (e.g., 30 TAC §§ 116.710(a)(5), .711(2)(C)(11), .711(2)(H and I), .716(a)(2)(B), and .718(b)) attempt to clarify that the Flexible Permit Program may not be used to circumvent, or be used in lieu of, the PSD or NNSR programs. The clarification that exceedances of Flexible Permit caps or individual emission limitations constitute violations, proposed 30 TAC § 116.715(b), is a good one, although most permitting agencies understand this basic element of environmental regulation as axiomatic. The requirement of proposed 30 TAC § 116.715(c)(5) that the permit, itself, reflect most of the monitoring requirements and the algorithms (for limits that are not rather directly monitored) is an improvement. Making it explicit that application representations are conditions upon which a permit is issued (proposed 30 TAC § 116.715(c)(8)) is also a useful clarification. The requirement of proposed 30 TAC § 711(2)(M)(vii) that terms of existing NSR permits – when superseded by, or incorporated into the terms of the Flexible Permit – be explicitly addressed in Flexible Permit applications is a good one. Similarly, the record keeping and

production requirements of proposed rule 30 TAC § 116.715(c)(6) are an improvement from current rules.

These are all useful clarifications of existing law. (These clarifications belie the TCEQ's and industry's recent pronouncements that existing Flex Permit regulations and the permits issued under these regulations do not run afoul of the federal Clean Air Act.)

The proposed 30 TAC § 116.716(c) requirements may help make Flex Permits more practically enforceable. We are happy to see the arbitrary "*de minimis*" 9 percent extra cushion for Flex Permit caps removed from 30 TAC § 116.716(d).

These improvements from existing Flex Permit rules do not resolve the larger problems with the Flexible Permit Program, including a lack of practical enforceability, opportunities for permittees to circumvent new source review, and a lack of public participation when changes are made at facilities covered by a Flex Permit.

Our overall impression is that the overhead for the permittee, the agency's staff and the public associated with adhering to (for the permittee) and understanding and enforcing (for the staff and the public) a permit issued under the Flexible Permit Program, and meshing the requirements for that permit with those for the PSD, NNSR and other minor NSR programs, outweighs the benefits the permittee receives from this program. If adopted, the new proposed Flex Permit rules will continue to place Texas industry at risk of violating the federal Clean Air Act, and will deny the public the protections offered by that federal law.

TCEQ should not approve the proposed Flexible Permit Program rules which consist of amendments to 30 TAC §§116.13, 116.710, 116.711, 116.715 - 116.718, 116.720, 116.721, 116.730, 116.740, and 116.750; and new §116.765. As explained below, the Flexible Permit Program is not approvable into the Texas State Implementation Plan. Therefore, to the extent the State of Texas insists on providing a Flexible Permit program to the regulated community, the program can be an addition to federal SIP-approved requirements. But, the program cannot be used in lieu of, or replace the obligation of new sources of air pollution or modifications of existing sources to obtain New Source Review (NSR), including minor NSR, permits.

II. THE PROPOSED FLEXIBLE PERMIT PROGRAM FAILS TO LIMIT ITS APPLICABILITY TO MINOR SOURCES

In disapproving the current Flexible Permit Program as part of the Texas State Implementation Plan (SIP), EPA explained:

The submitted Program has no express regulatory prohibition clearly limiting its use to Minor NSR and has no regulatory provision clearly prohibiting the use of this submitted Program from circumventing the Major NSR SIP requirements, thereby potentially exempting new major stationary sources and major modifications from the EPA Major NSR SIP requirements.

75 Fed. Reg. 41312, 41313 (July 15, 2010). TCEQ claims that proposed § 116.710(a)(5) resolves this problem. It does not. Proposed § 116.710(a)(5) explicitly allows Flexible Permits to be issued for major modifications and major new sources.

Furthermore, the language of proposed § 116.715(f) is far from clear but it could be interpreted to mean that a source can have a flexible permit even if it is subject to the Prevention of Significant Deterioration (PSD) or Non-attainment New Source Review (NA NSR) so long as the Director does not require the source to obtain a standard permit or permit by rule.

Proposed § 116.716(a)(2)(B) is clearer. It clearly allows a PSD or NA NSR source to obtain a Flexible Permit.

Thus, all of the reasons EPA stated for rejecting the current Flexible Permit Program as not meeting substitute major NSR program requirements apply to the proposed Flexible Permit Program.

In addition, EPA disapproved the existing Flexible Permit Program because it fails to include the requirement to make Major NSR applicability determinations based on actual emissions and on emissions increases and decreases (netting) that occur within a major stationary source. 75 Fed. Reg. at 41313. TCEQ proposes §116.711(a)(2)(H) and (I) as the remedy for this shortfall. These provisions, however, do not remedy the problem. To begin with, they do not provide any requirements for how the applicability determination is to be made. They do not state that the applicability determination must be based on actual emissions and on emissions increases and decreases that occur within a major stationary source as that term is used in the PSD and NA NSR programs. Furthermore, the proposed provisions do not require that the applicability determination be submitted to the state or EPA or that the public be given an opportunity to review and comment on it. Without this, the applicability determination requirement is not enforceable as a practical matter, and the public is given no opportunity to assess the validity of that determination.

Furthermore, proposed § 116.716(d)(2) makes this situation more confusing. It explicitly allows the addition of new facilities via a Flexible Permit Amendment but does not require a major source applicability determination and does not state that the new facility must be a minor modification.

Proposed § 116.718(b) does not provide any help in this regard. It attempts to rely on existing §§ 116.12 and 116.121. However, we are concerned that the relevant parts of these regulations are not SIP approved. EPA will have to rely on the SIP approved version of these regulations, which are not adequate for determining whether a major modification has occurred.

III. THE FLEXIBLE PERMIT PROGRAM FAILS AS A MINOR NEW SOURCE REVIEW PROGRAM

A. THE PROGRAM FAILS TO ENSURE THAT MINOR SOURCES WILL NOT CAUSE OR CONTRIBUTE TO A VIOLATION OF A NAAQS OR INCREMENT IN TEXAS OR OTHER STATES

The proposed § 116.718(c) does not resolve EPA's previous grounds for rejecting the flexible permit program because it lacks a requirement that minor sources demonstrate that they will not cause or contribute to a violation of a NAAQS. *See* 74 Fed. Reg. at 48482.¹ The proposed § 116.718(c) only requires a source to submit its air quality analysis if off-site ambient concentrations may be greater than *de minimis*. This provision is problematic for a number of reasons.

One is that it does not define *de minimis*. Nor does Texas have a SIP approved definition of *de minimis* for ozone, PM2.5, the new 1- hour NO2 primary NAAQS or the new 1 hour SO2 primary NAAQS. Thus, this requirement is not enforceable as a practical matter because it is vague.

Another problem is that an applicant may or may not be required to use "computer dispersion modeling." *See* Proposed § 116.711[(a)](2)(J). Assessing ambient impacts without computer dispersion modeling is no longer considered scientifically valid, yet this regulation does just that. In addition, even if required to use "computer dispersion modeling" the regulation does not specify which computer dispersion modeling must be used. However, 40 C.F.R. § 51.160(f)(1) requires the proposed program to use the Guideline on Air Quality Modeling (40 C.F.R. Part 51, Appendix W). There are numerous computer models that are no longer considered to deliver scientifically valid results and there are other computer models that are only meant to be used as screening tools. The proposed regulation improperly allows the use of all these inadequate tools to determine if a NAAQS will be violated.

A related problem is the lack of agency or public review for any analysis that an applicant believes shows impacts below the *de minimis* level. This is faulty, circular logic. Without agency and public review, we cannot know if the analysis truly shows impacts below the *de minimis* level, whatever they may be. Applicants' ambient impacts analyses contain errors all the time. Sometimes these errors are as simple as an applicant copying the wrong emission rate out of the application and into the computer modeling program. Sometimes these errors are much more complex or difficult to detect, such as applicants using unreliable meteorological data inputs, or applicants including emission units in the model but setting the emission unit to operate zero hours per day. It is the role of the regulatory agency to scrutinize applications, modeling files, and applicants' assumptions, but sometimes regulatory agencies fall down on the job; without combined public and regulatory agency review, it will not be possible to determine if the applicant has validly concluded that sources will only cause *de minimis* ambient impacts.

¹ We occasionally cite to the proposed disapproval rather than the final disapproval because the proposal provided more detail on some issues than the final and because the final relied upon the same reasoning as the proposal.

Moreover, the Flexible Permit Program allows changes of emission levels from one emission point to another as long as there is an emission cap covering the emission points and the emission cap is not violated. This type of change can result in sources creating or contributing to new NAAQS or increment violations. Take for example a source such as a refinery that has two emission points under one emission cap. One emission point has a 300 foot stack that is located a half mile from the fence line. The other emission point has a 14 foot stack and is located 50 yards from fence line. Transferring a substantial amount of emissions from the emission point with the tall stack far from the fence line to the other emission point with a short stack close to the fence line will almost certainly have an ambient air impact, and could cause or contribute to new NAAQS or increment violations. Thus, the proposed Flexible Permit program fails to assure that sources will not cause or contribute to an ambient air problem and/or a NAAQS or PSD increment violation.

B. THE PROGRAM FAILS TO REQUIRE THAT A SOURCE MUST FIRST CONDUCT A MAJOR SOURCE OR MAJOR MODIFICATION APPLICABILITY DETERMINATION

EPA denied SIP approval of the current Flexible Permit Program because it does not first require a source to conduct a proper applicability determination for major NSR. *See e.g.* 74 Fed. Reg. at 48491. As explained above, TCEQ's proposed §116.711(a)(2)(H) and (I) and § 116.718(b) do not adequately remedy this shortfall.

C. THE PROGRAM FAILS TO REQUIRE AN ENFORCEABLE EMISSION CAP TO ENSURE THAT THE SOURCE MAINTAINS ITS MINOR SOURCE STATUS

EPA denied SIP approval of the current Flexible Permit Program because it lacks replicable, specific, established implementation procedures for establishing the emission cap in a Minor NSR Flexible Permit. EPA explained:

In sum, the submittal lacks specific, established, replicable procedures providing available means to determine independently how the source or the State will calculate an emission cap, determine the coverage of a Flexible Permit, establish individual emissions limitations for each site, a facility on the site, a group of units on the site, or for one pollutant but not another. It also is not clear to EPA what the process is and how the emission cap is adjusted for the addition of new facilities. *See* submitted 30 TAC 116.716(c). Furthermore, the submitted regulations include a term, "multiple emission caps," with an ambiguous meaning. *See* submitted 30 TAC 116.715(b). It is not clear whether this term means multiple emission caps because there is one cap for each pollutant, or whether there can be more than one cap for one pollutant.

74 Fed. Reg. at 78492.

TCEQ offers the proposed § 116.716 in response. However, § 116.716(a)(1) does not change anything. First, “like-kind” facilities is not defined in the regulations so it is simply an invitation for confusion and protracted litigation rather than for an enforceable cap. Second, proposed § 116.716(a)(1) still allows site-wide caps so it does not change anything.

D. THE PROGRAM FAILS TO REQUIRE SUFFICIENT MONITORING, RECORD KEEPING AND REPORTING

In disapproving the current Flexible Permit program, EPA found that:

[T]he Program does not meet the requirements of section 110(a)(2)(A)–(C), which require that SIP revision submittals be enforceable. There are no specific upfront methodologies in the submitted Program to be able to determine compliance. Nor did EPA find the testing, recordkeeping, reporting, and monitoring provisions necessary to establish how compliance will be determined and to ensure that the NAAQS are protected. For example, the Program could allow hundreds of unrelated emission sources to be subject to one emission cap and/or individual emission limitations. Yet the submitted Program contains no time period for the cap (e.g., hourly, monthly, and/or annual limits such as rolling limits).

Submitted 116.117(7) is an illustration of our concerns. It states that initial compliance testing with ongoing compliance by engineering calculations “may be required.” This means that under the Program, compliance testing may not be required at all and provides no guidance for when monitoring will be required.

74 Fed. Reg. at 48492.

TCEQ proposes §116.715(c)(5), (6) and (12) and (d) and §116.711(a)(2)(G) to remedy this defect. They do not.

Proposed § 116.715(c)(5)(A) requires monitoring or demonstrating compliance. Thus, monitoring is not required. Furthermore, 715(c)(5)(C) provides that whatever monitoring does actually make it into the permit can nevertheless be disregarded without any public review if the permittee requests it. Similarly, 715(d)(2)(E) again provides the Director with wide latitude for picking a monitoring system regardless of the parameters set forth in 715(d)(2)(A) – (D).

E. THE PROGRAM FAILS TO REQUIRE RETENTION AND COMPLIANCE WITH OTHER REQUIREMENTS

In disapproving the existing Flexible Permit Program, EPA found it failed to:

[M]aintain recordkeeping sufficient to ensure that all terms and conditions of existing permits (including representations in the applications for such permits) that are incorporated into the Flexible Permit continue to be met. The submitted Program lacks adequate program requirements for the tracking of existing SIP

permits' major and minor NSR terms, limits and conditions, and whether such requirements are incorporated into a Flexible Permit or they remain outside the coverage of the Flexible Permit. Minor and Major NSR permits, as well as minor NSR SIP Permits by Rule and Standard Permits, can be incorporated into a Flexible Permit without any program requirement in place that ensures the SIP permits' terms and conditions are included in the Flexible Permit.

74 Fed. Reg. at 48493. The proposed Flexible Permit Program has the same problem. The proposal explains that the "flexible permit would then become the controlling authorization for all facilities included in the permit, succeeding any existing minor NSR permits that may have been applicable to all or part of the facilities." Proposal at 2.

F. THE PROGRAM FAILS TO PROHIBIT SOURCES FROM MAKING *DE FACTO* CHANGES TO EXISTING SIP PERMITS

EPA explained, when disapproving the existing Flexible Permit program, that:

We also are proposing to disapprove the submitted Program because it would allow holders of a Flexible Permit to make de facto amendments of existing SIP permits, including changes in the terms and conditions (such as throughput, fuel type, hours of operation) of minor and major NSR permits, without a preconstruction review by Texas.

74 Fed. Reg. at 48493. TCEQ does not offer any changes to the regulations to address this concern. However, the language of § 116.721(c) plainly supports EPA's concern that a Flexible Permit can allow changes to SIP permit terms such as limits on throughput and fuel type. Thus, the proposed Flexible Permit program continues to fail to meet applicable requirements.

G. THE PROGRAM FAILS TO REQUIRE IDENTIFICATION OF ALL THE RELEVANT EMISSION UNITS AND APPLICABLE REQUIREMENTS IN THE PERMIT

TCEQ proposes §116.711(a)(2)(M)(vii) to address EPA's comment that existing SIP permits' major and minor NSR terms, limits and conditions, must be tracked and accounted for. However, §116.711(a)(2)(M)(vii) is just a requirement of what needs to be in an application, not a permit itself. Thus, it fails to address EPA's concern.

TCEQ proposes § 116.716(a)(2)(B) and (a)(3) to address "EPA's stated concerns that the flexible permit program could allow a facility to avoid federally-required control technology." We assume that this section means to discuss how the emission cap will be determined, even though it actually says it is determining "emissions." Emissions, of course, have to be determined by monitoring, testing and record keeping.

Even with that correction, the section fails to achieve its objective because it does not discuss averaging times. If, for example, a BACT limit is based on a one hour averaging time and it is used to calculate an annual emission cap, the BACT limit is no longer being used

because averaging time is a component of an emission limit. While the proposed regulations say there should be a “short term” emission cap, the regulations do not require the emission cap to match the original emission limit and do not even define short term. Moreover, any emission limit that is averaged into a cap with other emission limits from other emission points no longer exists if it is not applied to the specific unit for which it is meant. The same problems exist with proposed § 116.716(a)(3)’s attempt to address LAER.

Proposed § 116.716(d)(1) just makes this problem worse. It effectively weakens an emission rate based on BACT, LAER or other requirements, at least for six months, when a facility that was used to calculate the emission cap is shut down.

IV. THE PROPOSED FLEXIBLE PERMIT PROGRAM SUFFERS FROM THE SAME PERSISTENT PROBLEMS REGARDING PERMIT ALTERATIONS

Proposed § 116.740(a) does not require public notice and comment on Flexible Permit alterations. Permit alterations have been widely abused by applicants seeking to make modifications, emissions increases, or removing previously enforceable important application representations. TCEQ has routinely allowed permit alterations when emissions increases are expected as long as emissions are not expected to exceed allowable limits. Moreover, TCEQ has routinely granted permit alterations when emissions *could* increase, on the theory that emissions will not, under all operating scenarios, increase.

TCEQ’s rules regarding permit alterations and permit amendments, 30 TAC 116.116, are reasonable on their face. Commenters acknowledge that permit alterations that could never result in an emissions increase or change the method of operation are reasonable; commenters also acknowledge that such alterations can be made without public notice. However, TCEQ has a long and clear history of complacency or complicity when it comes to allowing permit alterations that would never be allowed under federal rules or longstanding EPA policies. For example, TCEQ allows permit alterations to remove existing operational restraints such as increasing hours of operation, removing throughput or heat input limitations, or increasing emissions so long as there is no increase in allowables. For these reasons, commenters oppose alterations to Flex Permits when the alteration lacks public notice or opportunity for comment.

V. SUGGESTED IMPROVEMENTS TO THE PROPOSED RULES, IF ADOPTED

As explained above, we oppose TCEQ’s proposed Flexible Permit Program. The proposed rules suffer from many of the same problems as the existing rules and, we believe, should not be approved by TCEQ, or incorporated into the Texas SIP.

However, if TCEQ intends to finalize these proposed rules, we urge that the rules be improved and clarified consistent with our concerns detailed above. In addition, we suggest the following improvements:

1. Require NAAQS impact modeling for all amendments or alterations to flexible permits for which dispersion modeling was not previously required. Proposed §

116.711(2)(J) would not require this, if the amendment or alteration did not increase an individual limit or the overall cap. The existing permissive rule language theoretically allowed applications, amendments and alterations to be approved without NAAQS modeling, and many facilities availed themselves of this omission.

2. Permit alteration or amendment materials for flexible permits should identify any terms, conditions, and representations of prior permits that will be superseded by or incorporated into the altered or amended flexible permit. A variation of proposed 30 TAC § 116.711(2)(M)(vii) would accomplish this.

3. The proposed 30 TAC § 116.715(f) should be rewritten to make the “approval” requirement a mandatory condition of flexible permits. There should be a non-discretionary check on the impact of standard permit and permit-by-rule emission increases at sites where some or all facilities are covered by a flexible permit. Also, “significant impact on the air environment” is not a conventional term of art, so it should be defined.

4. 30 TAC § 116.715(c)(5), as proposed, would not require a permit statement of the emissions calculation that is used for compliance in those situations where there is continuous operating parameter monitoring but where CEMS are not measuring emissions levels. The method of converting the parameter measurements to emission estimates should be specified. Along these lines, the CPMS definition (30 TAC § 116.13(2)) should clarify when, if ever, what are thought to be abnormal readings may be discarded in the recording of the “average operational parameter values.”

5. The requirement of proposed 30 TAC § 116.715(c)(8) regarding application representations should explicitly say that a violation of a condition on which a permit was issued is a permit violation. Further, we are worried that the term “operation procedures” does not have a sufficiently agreed-upon connotation. A few examples (e.g., design heat rate or average fluid residence time or tons/hour throughput) would help with this problem.

6. The decision in proposed 30 TAC § 116.715(c)(12)(C) that revalidation of site-generated test data must occur only every 5 years is too generous. Data should be revalidated no less often than every three years, and, if a year’s results deviate more than some percentage, we recommend 10%, from the originally-generated data (i.e., the data on which the permit was based), then, the revalidations should occur annually for a period of years. Also, there should be added a reporting requirement (e.g., 30 TAC § 116.715(c)(12)(D)), requiring the permittee to promptly forward to the agency the results of testing at the site that is directly relevant to determining emission rates or the character of emissions for covered facilities.

7. The permit should specify which of the four options provided by proposed 30 TAC § 116.715(d)(2) is used to determine the levels of which emissions from which facility.

8. The cap calculation in proposed 30 TAC § 116.716(a)(2)(A) relies on the definition of “expected maximum capacity” in 30 TAC § 116.13(4). This, in turn, allows the capacity value to be less than the physical and operational design value, if the “planned operation” of the facility were less than its physical and operational design. If the cap is to be calculated taking into consideration the “planned operation” of a facility at less than its physical and operational design, then, the lesser level of operation needs to be specified as a permit term. If that is not desirable, then, the § 116.13(4) definition needs to be amended to remove the “planned operation” relaxation.

9. The final sentence of proposed 30 TAC § 116.716(d)(3) needs to be clarified. If a like-kind cap were being increased because of the modification of a covered unit (say, a physically-changed catalytic cracking unit), would the rule require that all the other like-kind facilities under the cap be treated as though they, too, were modified, unless each one of them were, in fact, unmodified and had a unit-specific limit or PTE constraint? If all or some covered units that are not subject to separate permit limits will experience a change in their methods of operation, so as to realize the benefits of the physically-modified unit, but have not themselves had physical modifications, will those covered units be considered “not modified,” even though their PTEs had earlier been based on their “planned operation,” rather than on their physical design limits? The re-calculation of the permit cap over time is important and difficult, and the rules for this need to be particularly clear. At the very least, the preamble language for the final adoption needs to present a couple of examples reflecting how the texts of proposed §§ 116.13 and 116.711(a) and (d) interact.

10. Proposed 30 TAC § 116.718(c) should make an increase in off-site emission impacts, not an increase in facility emissions, the trigger for NAAQS-impact modeling. Particularly for the new one-hour NO₂ standard, the locations within a site from which emissions emanate can impact off-site NAAQS attainment, even in the absence of an over-all increase in site criteria pollutant emissions.

11. Proposed 30 TAC § 116.721(a) defines “a significant increase in emissions” as a trigger for the requirement of a permit amendment. This term needs to be defined, or there needs to be a reference to a definition stated elsewhere. Also, the term should clearly refer to actual, as opposed to allowable, emissions. The trigger should specify that the determination of an emissions increase be a determination based on actual typical short-term or typical annual emissions; it is simply too easy to hypothesize a short-term scenario (a particularly clean fuel or a particularly high-moisture-content fuel, for example) under which there will be no anticipated emissions increase, even though, when compared to typical conditions, there will be an emissions increase. Thus, we believe the term should be restated: “a significant increase in actual emissions under any typical short-term or annual operating conditions.”

12. The proposed rule should also clarify that a delay in the implementation of required emission controls is a relaxation of emission controls; the “alteration” language in proposed 30 TAC § 116.717 might be read to imply that delays in required emission controls may be allowed by permit alteration.

VI. CONCLUSION

In closing, we urge TCEQ to discard its Flexible Permit Program. Flexible Permits, permit alterations, permits by rule, and standard permits, are all examples of TCEQ regulations that are intended to give the regulated community flexible and streamlined permitting mechanisms. Yet, these mechanisms are *implemented* in ways that deny the public adequate protections guaranteed by the federal Clean Air Act.

The proposed Flexible Permit rules contain some improvements over the current rules, but are still not approvable as part of the Texas SIP. Moreover, we remain concerned that implementation of the rules will result in the same systemic problems which EPA and public interest advocates have complained of for many years. It remains our view that this program will continue to result in permits for which the determination of compliance is nearly impossible.

Thank you for the opportunity to provide these comments.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ilan Levin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ilan Levin
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