



Port Aransas Conservancy

P.O. Box 422, Port Aransas TX 78373

www.portaransasconservancy.com

April 30, 2019

TCEQ Public Information Coordinator
MC797, P.O. Box 73087
Austin, Texas 78777-3087

Re: Air Quality Permit Application Permit number 154527

On November 14, 2018 DiSorbo Consulting on behalf of Axis Midstream Holdings LLC filed a New Source Review Permit Application "to authorize the construction and operated a marine terminal capable of loading crude oil and/or crude oil condensates onto ocean going ships/barges and inland barges via two loading berths near Aransas Pass, Texas." The project would in fact not be anywhere near Aransas Pass but instead within the city limits of Port Aransas. The Port Aransas Conservancy is very concerned about the impact this project would have on the ecology of the neighboring estuary and the economy of our tourist-dependent town.

Axis Midstream acknowledges in their application that the proposed project would emit numerous air pollutants including "carbon monoxide, hazardous air pollutants, hydrogen sulfide, 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 limits of these substances that Axis claims are apparently just below the threshold that would trigger more stringent EPA restrictions. However our experts are not in a position to evaluate those claims since Axis has marked the appendices that show their calculations "Contains Confidential Information," leaving them blank online:

- Appendix A: Routine Emission Calculation Details
- Appendix B: MSS Emission Calculation Details

Therefore, we are unable to determine whether

- Emission sources have been identified correctly;
- Correct emission and control factors have been used;
- Best Available Control Technology is applied.

Consequently under terms of the Public Information Act (PIA) we request access to the full content of Appendix A and Appendix B of Axis' permit application, either by email, mail, or by visiting your office. We look forward to your reply and to an early resolution of this matter.

Sincerely,

A handwritten signature in black ink that reads 'John Donovan'. The signature is written in a cursive, flowing style.

John Donovan, for the Port Aransas Conservancy