

ENBRIDGE/YARA Talking Points for EXPEDITED Major New Source Review Air Permit 174275

Yara, the world's largest ammonia producer, has partnered with the Enbridge Ingleside Energy Center, the nation's largest oil export terminal, to form the "Ingleside Clean Ammonia Partnership". Enbridge/Yara plans to build a \$3 billion "blue ammonia" plant within the City Limits of Ingleside and next to the City of Ingleside on the Bay. They claim ammonia will produce clean fertilizer to feed the world. This is a lie; it's called "greenwashing", and there is no concern at all for the dangerous risks it is taking with the lives of people who live near the proposed plant – like folks in Ingleside on the Bay and Ingleside.

- ICAP's plan is to transport natural gas as feedstock across San Patricio County via pipeline to the Enbridge Ingleside Energy Center next to IOB, where two "trains" will produce **8000 metric tons** of ammonia every day - to be exported overseas by ship.
- Where will the natural gas pipeline be placed and how large is the natural gas blast zone?
- To put this in context, earlier this year, in a story that made national news, five people died, including two children, after just **4000 gallons** of ammonia were spilled from a semi-truck on an Illinois Highway.
- Ammonia is highly toxic and can be fatal within only a few breaths. (Canadian Occupational Safety)
- Anhydrous ammonia is **corrosive** and can cause *irreversible damage* to the eyes and to the lungs.
- There are numerous documented cases of people dying from explosions, leaks, and spills involving ammonia – including the explosion in West, Texas where 15 people died and 160 were injured.
- The ammonia will be used for fertilizer, which can also be used by terrorists, as it was when Timothy McVeigh killed 168 people and injured 850 in the Oklahoma City bombing.
- How can it possibly be safe to have 8000 metric tons of ammonia produced and shipped so close to a residential area – with some people living as near as ¼ mile to the facility and the entire city of IOB living within 2 miles?
- If the plant loses power for an extended period, like from a hurricane, the stored ammonia will not be able to be kept cool – leading to a potential disaster.
- Even with all these risks to human health and safety, the brief Disaster Review section of the application merely acknowledges that ammonia is a "highly hazardous chemical" and states that portions of a "Federal Risk Management Plan" will be submitted sometime "prior to initiating operation of the Plant". Shouldn't the communities in harm's way have input into and receive copies of safety plans for this dangerous facility?
- A primary school is less than two miles downwind of the proposed plant – right in the pathway of harmful annual emissions, including nearly 200 tons of particulate matter, 66 tons of ammonia, and 33 tons of Volatile Organic Compounds or VOCs. These can cause cancer, premature death, and other health risks – especially to children and vulnerable adults, like the elderly or those with existing health conditions.
- What are the health effects for additional toxic pollutants emitted by ammonia production?
- Yara Postponed clean ammonia IPO after weak valuation June 25, 2023 (Yahoo UK Finance)
- Enbridge Canadian & Yara Norwegian corporations want to build here due to lax air emission laws & heavily incentivized tax incentives that calculate to \$247,318,013 PER YEAR
- ICAP has paid additional funds to "expedite" this permit.
- Enbridge/Yara say they will commit to meeting air emission limits; however, Enbridge has a history of modifying air permits multiple times. Will this be allowed again by the TCEQ?
- Air monitoring will be by handheld monitor. TCEQ has no air monitoring stations in San Patricio County.
- "Clean" Ammonia only relates to carbon dioxide capture/sequestration (CCS) and geologic storage.
- CCS is not technologically proven. Chevron, Exxon & Shell Gorgon Australian Flagship project has failed to store one-third of the carbon dioxide its designed to capture.
- Enbridge/Yara admits that CCS "is still new" but still wants to produce ammonia for 360 days after startup and be allowed to emit 3.37 million tons of CO₂ – THIS IS NOT CLEAN AMMONIA!

- They are greenwashing by calling this “blue” which allows our federal tax dollars be paid to Canadian and Norwegian companies.
- Yara, the Norwegian partner has reported emissions, 23 times higher than stated in their plant located in Australia.
- What happens to the facility if shut down occurs during hurricanes, freezing temperatures, loss of electrical supply, gas or CO2 pipeline shutdown, or an explosion or toxic leak?
- How large is the facility blast zone if a catastrophic leak or fire occurs?
- Our local Volunteer First Responders are very good at fighting fires and responding to generalized emergencies; however chemical incidents require professionals specifically trained in chemical incidents.
- The proposed location also would make evacuation difficult for an IOB resident. 1609 is the only way out with only one direction towards safety. The opposite way leads you towards the plant.
- Enbridge representative demonstrates the attitude towards local communities when quoted; “Stop screwing us over with the local government.”
- The highly toxic ammonia plant should not be placed less than a mile from residents nor downwind 1.6 miles from a primary school. With our prevailing coastal winds, the toxic emission could travel miles further and threaten the health of our children, the elderly and citizens.

Talking points about their submitted Plain Language Summary Permit #174275

- Cooling Towers – water mist including the dissolved solids will be carried downwind and precipitate out as (only 183.71 tons per year) of particulate matter. Does this process collect only particulate matter? Where do all the other emissions go? What happens to the collected solids from the Cooling Towers and where do they end up?
- Auxiliary boiler for steam generation - use best available low NOx combustion control technology which MAY INCLUDE one or more of the following: low-NOx burners, flue gas recirculation, and/or post-combustion controls. WHY NOT USE ALL THE BEST AVAILABLE TECHNOLOGIES?
- Use of sweet natural gas as raw material then why do they need sulfur removal equipment? Sulfur dioxide 3.86 tons per year plus hydrogen sulfide (H₂S) 0.87 tons per year. [Definition of sweet natural gas contains only trace quantities of H₂S and CO₂.]
- Sulfur removal equipment joining hydrogen with sulfur (to form a different molecule) CALLED HYDROGEN SULFIDE H₂S, followed by a catalyst to absorb “new molecule”, HYDROGEN SULFIDE so that it is not released into the air. Why doesn’t the applicant just tell the true story?
- Process heaters and steam superheaters -mixes exhaust gas with catalyst and ammonia causes chemical reaction that produces cleaner emissions of mostly nitrogen and water. WHAT DOES CLEANER EMISSIONS AND MOSTLY EQUATE TO? Maybe as compared to NO EMISSIONS??
- Hydrogen production and ammonia synthesis equipment. Enbridge/Yara admits to venting pollutants to the atmosphere during start-ups, shutdown or maintenance operations. Large streams, smaller streams continuous and especially if Carbon Capture and Storage not accomplished. THIS IS A CLEAR ADMISSION BY THE APPLICANT OF LARGE AMOUNTS OF CO₂ EMISSIONS AND WHO KNOWS WHAT ELSE DURING START-UP, SHUTDOWN & MAINTENANCE OPERATIONS. WILL RESIDENTS BE NOTIFIED OF THESE RELEASES BEFORE THEY OCCUR? HOW WILL THEY BE MEASURED AGAINST THE PERMIT APPLICATION?
- Flares- burn at what temperature and what will be the percentage of pollutants that are not burned off and emitted? Current flares for oil export have shown to have hundreds of deviations releasing tons of VOC’s to atmosphere. TCEQ has zero monitors, IOBCWA shows large increases in VOC’s in Ingleside compared to Pt. Aransas and Ingleside on the Bay from SCI monitors.

- Atmospheric storage tanks – what fluids will be placed in these tanks? Is painting them white a best practice strategy! Below fluid level piping flowline still needs to fill tank with what? What happens to the vapors when displaced by added fluids? How are they measured during venting?
- Refrigerated ammonia storage tanks – boil off system is defined as: “Ammonia continuously evaporates, creating a gas called boil-off gas (BOG). BOG leads to an increase of the pressure in the tanks and losses of ammonia through safety valves or blow-off valve which could have impact to economic and safety problems.”
- Wastewater treatment facilities – Who will monitor the wastewater to be discharged into CC Bay? Ammonia is highly toxic to marine life.
- Emergency engines firewater pumps and generators – how will these be designed to control a fire, explosion, or discharge of pollutants?
- Fugitive components – handheld monitors should be in addition to fence line, onsite real-time EPA approved monitors. Monitoring should determine the permit limits of pollution emissions and shut down production if emissions exceed limits. The public wants no part of this facility and incremental increases in amended air permits should be prohibited. TCEQ should also include the cumulative effect for Enbridge’s oil export terminal, Flint Hills and Buckeye emissions. What penalties and fines will be imposed for emission violations?
- When asked how much water use, they will require – At the “Enbridge/Yara open house” they said we are still working on that number although they have the pollutants calculated to hundredths decimal point.