

Ingleside, Texas City Council Meeting
Suggested Enbridge/Yara Objectionable Use Permit Talking Points
January 16, 2024

Background

Ingleside Clean Ammonia Partners, LLC applied for an Initial Air Quality Permit for the proposed Ingleside Blue Ammonia plant that will produce/manufacture ammonia at 1450 Lexington Boulevard, Ingleside, San Patricio County in October 2023. As a part of that process, this proposed Enbridge and Yara joint-venture company applied for a City of Ingleside Objectionable Use Permit on November 20, 2023, per the Planning and Zoning Subdivision Ordinance, Chapter 78, Article IV, Section 78-267. **Our local community needs to empower itself and push back on this process now before it is too late. Public participation is the key to success in protecting our air quality and the health of our residents and workers. Potential talking points include but are not limited to the following.**

1. I object to this permit because the proposed site name of Ingleside Blue Ammonia and the pending permit application from the Ingleside Clean Ammonia Partners, LLC designations are examples of greenwashing so that the public and local governments will be more accepting of the heavy industry. The proposed facility will emit many pollutants in our community including volatile organic compounds (VOCs), oxides of nitrogen (NOx), carbon monoxide (CO), particulate matter equal to or less than 10 microns (PM₁₀), particulate matter equal to or less than 2.5 microns (PM_{2.5}), sulfur dioxide (SO₂), hydrogen sulfide (H₂S), hazardous air pollutants (HAPs), ammonia (NH₃), and gashouse gases (GHGs).
2. I object to this permit as Yara Clean Ammonia, a Norwegian company and Enbridge Incorporated, a Canadian company are equal partners in this business venture, the latter having a poor environmental performance record for our local community. Enbridge operates the largest crude oil storage and export terminal by volume in the U.S. in Ingleside, Texas. Previous optical gas imaging (OGI) surveys were conducted in December 2021 and September 2022, and resulted in multiple TCEQ complaint investigations for storage tank emissions and for vapor combustors that were not properly operating. Publicly available documentation shows that the Enbridge facility has been responsible for more than 300 environmental state and federal citations from 2016-2022, including minor, moderate, and major violations of existing laws.
3. I object to this permit because the federal Occupational Safety and Health Administration's (OSHA) Process Safety Management Plan considers ammonia a highly hazardous chemical and per 40 Code of Federal Regulation (CFR) Part 68, this plant will be subject to and will have to comply with federal Risk Management Plan requirements, and thus, it will have to complete a disaster review for this geographic area. If this proposed plant is required to do a disaster review per the federal government, it obviously will have potential to cause danger to Ingleside area residents. What kind of health and safety danger will our community experience during a tropical storm or hurricane?

4. I object to this permit because Ammonia is a colorless gas with a pungent odor. It can interact with moist tissues like eyes, throat, and lungs. High level exposure can lead to lung damage or death, while people with asthma are sensitive to it. Ammonia, even in diluted concentrations, is highly toxic to aquatic life, and thus it is classified as dangerous to the environment.
5. I object to this permit because Ammonia is a corrosive compound, and thus it can damage infrastructure and metals. This destructiveness could physically damage pipes, storage tanks, instruments, cooling towers, et cetera within the plant. It also would have potential to damage infrastructure within our community from downwind pollutants. It is so corrosive that infrared cameras lenses need shielding for protection.
6. I object to the permit because Ammonia is a dangerous chemical that poses a risk to Ingleside, Ingleside on the Bay, and the Coastal Bend area. Residential areas, businesses, places of worship and schools are in the predominant downwind path. It also poses risk for industrial workers including those in adjacent plants.
7. I object to the permit because according to the City's own Objectionable Use Ordinance #78-267, "the city council shall not permit such buildings, structures, or uses unless they find that the public health, safety, morals, and general welfare will be properly protected, and that necessary safeguards will be provided for the protection of surrounding property and persons from hazards, such as fire, explosion, noise, vibration, dust, or the emission of smoke, odor, or toxic substances, accompanying the proposed use." City officials, including but not limited to the city council, cannot guarantee that community public health, safety, and general welfare will be protected from this proposed plant's emissions.
8. I object to this permit because the City is given an option, per existing language in its Objectionable Use Ordinance #78-267, when it states that "After the public hearing, at a public meeting, the city council may consider the matter for action. The city council may approve or deny the application or make any other decision it deems appropriate. Therefore, the City is not forced to decide on this Objectionable Use Permit right now. I request that the city council stand neutral and not vote tonight. Let the state and federal permitting process by the Texas Commission on Environmental Quality (TCEQ) and the Environmental Protection Agency (EPA) proceed with more data before the City takes action.
9. I object to this permit because the TCEQ and EPA do not have any existing stationary air monitors near Ingleside, Texas to character the harmful chemicals that we are being exposed to even now, as existing stations are located south of Corpus Christi Bay. Therefore, the city council cannot guarantee the safety of our residents if this plant is built in our community.
10. I object to this permit because even if the TCEQ and EPA developed stationary air monitors in the Ingleside area, the state and federal regulators currently have no stationary ammonia monitoring capability in Texas. Again, the City cannot guarantee that the community public health, safety, and general welfare will be protected from this proposed facility.
11. I object to this permit because the TCEQ's historical mobile monitoring program did no ammonia air monitoring other than agricultural sources, as it was too dangerous to assess industrial ammonia sources downwind even with respiratory protection.
12. I object to this permit because the 2016 Emergency Response Guidebook that is used by first responders states that ammonia is so dangerous that the initial isolation and protection action distances (which may increase later) for large spills from a rail tank car during the day should be 1.1

miles with <6 miles per hour (mph) wind, 0.8 mile with moderate wind (6-12 mph), and 0.6 mile with high winds (>12 mph), while nighttime protections include a 2.7 miles distance for low winds (<6 mph), 1.4 miles for moderate winds (6-12 mph), and 0.8 mile for >12 mph winds. How much larger will the ammonia tanks be, as compared to rail cars? Multiply the distance based on the size of the storage tanks and the pressure that the ammonia emissions will be released under. Again, the City cannot guarantee the public health, safety, and general welfare of our community from this facility.

13. I object to this permit because the 2016 Emergency Response Guidebook that is used by first responders states that ammonia is a corrosive gas that is “toxic, and it could be fatal if inhaled, ingested, or absorbed through the skin. Vapors are extremely irritating and corrosive. Contacts with gas or liquified gas may cause burns, severe injury, and/or frostbite. Fire will produce irritating, corrosive, and/or toxic gases.”
14. I object to this permit because the 2016 Emergency Response Guidebook that is used by first responders states that ammonia has fire and explosion potential hazards including the fact that “liquified gasses are initially heavier than air and spread along the ground. Some of the materials may react violently with water. Containers may explode, and if cylinders are exposed to fire, they may vent and release toxic and/or corrosive gas through pressure relief devices. Cylinders (which would include storage tanks), may explode when heated.”
15. I object to this permit because the TCEQ has limited ammonia mobile monitoring capability – mostly qualitative data per the EPA, thus it is not defensible in court. The Agency also has no ability to analyze quantitative canister samples. Regional office field investigators have no respiratory protection.
16. I object to this permit because I have researched media stories on ammonia production facilities that are located near residential communities. Facilities that include but are not limited to those near Donaldsonville and Waggaman, Louisiana have had citizens’ complaints about ammonia emissions, odors, and safety issues.
17. I object to this permit because it states that “It aims for 95% carbon capture.” When someone aims for something that means it is a goal that is not always achievable. The permit claims that the process gashouse gas emission will be captured by carbon capture and sequestration (CCS). This proposed permit does not state what is going to happen if the CCS permit is not approved, thus it sounds like the company’s emissions are just going to be released to the environment.
18. I object to this permit because CCS is an unproven technology in a large-scale design. The largest energy companies in the world, like ExxonMobil and Chevron, have not figured out how to make it work so why would we believe that Enbridge and Yara will make it work here? The Ingleside community does not want to be a guinea pig located adjacent to a CCS site. It will pose a health and safety danger for our children and for sick and elderly residents.
19. I object to this permit because Enbridge and Yara management are asking for a potential permit for the ammonia plant and there will be another permit for potential CCS development. Enbridge and TCEQ are splitting permitting actions again just like they are trying to do for the revision of the Title V Federal Operating Permit for the Ingleside Enbridge Oil Terminal. No one should split these permits because this is an attempt to get less stringent permitting compliance standards from TCEQ.