SOAH DOCKET NO. 582-19-1955
TCEQ DOCKET NO. 2018-1303-AIR

APPLICATION OF VULCAN CONSTRUCTION MATERIALS, LLC, FOR PERMIT NO. 147392L001 IN COMAL COUNTY, TEXAS	§ § § §	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

MOTION FOR REHEARING

TO THE HONORABLE COMMISSIONERS:

Come now, Friends of Dry Comal Creek and of Stop 3009 Vulcan Quarry, referred to in the Proposal for Decision as "Friends Protestants," and move the Commission to rehear its November 21, 2019, final decision in this docket. Rehearing is justified on the following topics for the following reasons.

1. Failure to require or conduct a health effects review for the Vulcan facility

Sec. 382.0518, Tex. Health & Safety Code, directs that the Commission may permit a facility only if the Commission finds no indication the facility will harm the public's health and physical property. To similar effect are 30 TAC § 116.11(a)(2)(A)(i) and 30 TAC § 101.4.

TCEQ staff conducts a preconstruction technical review during the air permitting process. According to the staff's guidance document, MERA,[1] "this review ensures that the operation of a proposed facility will comply with all the rules of the TCEQ and intent of the TCAA, and not cause or contribute to a condition of air pollution. A review of an

---

[1] APDG 5874, Modeling and Effects Review Applicability (2009), p. 1.

air permit application involves an assessment of … human health and welfare effects related to emissions from production and planned maintenance, startup, and shutdown (MSS) activities."

However, for the Vulcan facility, the staff did not require and Vulcan did not undertake a MERA analysis. There was no health effects review required, because the staff and Vulcan considered rock crusher facilities exempt from that review. This position, in turn, was based on Appendix B of the MERA guidance, which is a list of facilities for which allegedly, no health effects review is required.

Reliance on the exemption in the guidance document and the absence of a health effects review of the facility that flows from that reliance were in error. The Texas Legislature has specifically provided that TCEQ must utilize the rulemaking process to establish general policy.[2] In *Rodriguez v. Service Lloyds Insurance Company,*[3] at 255, the Texas Supreme Court has noted that, "we cannot defer to an administrative interpretation that is plainly erroneous or inconsistent with the regulation." A presumption favors the adoption of rules of general applicability through the formal rulemaking process, and an agency's failure to follow the clear unambiguous language of its own regulation is arbitrary and capricious.[4] This is because the formal rulemaking process assures that the public and affected persons will receive notice of rules of general

---

[2] Tex. Water Code § 5.105.

[3] *Rodriguez v. Service Lloyds Insurance Company*, 997 S.W.2d 248, 254 (Tex. 1999). See also *El Paso Hosp. District v. Texas Health & Human Services Comm'n,* 247 S.W.3d 709, 715 (Tex. 2008).

[4] *Rodriguez*, at 255.

applicability and have an opportunity to be heard.[5] The Legislature has delegated rulemaking power to agencies in the expectation that rules of general applicability will be adopted through the formal rulemaking process,[6] and, so, agencies lack the power to create binding policy by means of guidance documents.[7]

The failure to require or conduct a health review of the Vulcan facility violated the statutory and regulatory provisions, was in excess of the agency's statutory authority and was arbitrary and capricious.[8]

2. Failure to model the off-site impacts of emission sources that are not, themselves, "facilities"

Neither Vulcan nor the TCEQ staff included in the modeling inventory used for the air dispersion modeling known stationary sources of emissions that were not, themselves, "facilities." This failure would have made not credible the health effects review of the Vulcan facility, had such a review been undertaken. As is, the failure made impossible the negative finding required by 382.0518(b)(2), Tex. Health & Safety Code and violated 30 TAC § 1176.111(a)(2)(J).

---

5 *Rodriguez*, at 255.

6 *Rodriguez*, at 255.

7 See, *Brinkley v. Texas Lottery Comm'n*, 986 S.W.2d 764, 769 (Tex. App. – Austin, 1999) no pet.

8 Consequently, without limitation, Findings of Fact Nos. 21, 22, 23, 24, 25, 26, 32, 33, 45, 46, and 49 were not supported by substantial evidence considering the reliable and probative evidence in the record, violated the applicable statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious. Furthermore, without limitation, Conclusions of Law Nos. 5, 12, 14, and 15 were in excess of TCEQ's statutory authority, and were arbitrary and capricious.

The TCEQ staff required Vulcan undertake air dispersion modeling to determine air quality impacts from the Vulcan facility.[9] That modeling requires, as model inputs, emissions drawn from an emissions inventory. TCEQ's modeling guidance,[10] p. 14, provides that "[t]he modeling emissions inventory consists of the emissions from facilities to be permitted, as well as other applicable on- and off-property emissions." In this docket, emissions from roadways and quarries at the Vulcan site and near that site were not included in the emissions inventory. Friends' engineer, Howard Gebhart, explained the obvious, that the non-regulation of roads and quarries does not logically justify disregarding contaminants contributed by those sources when permitting or analyzing the impacts of sources that TCEQ does regulate.[11]

Vulcan's failure to consider and TCEQs' failure to require consideration of road and quarry emissions from sources on Vulcan's property, alone, led to a failure to demonstrate that the to-be-permitted project will not cause a violation of the NAAQS. Mr. Gebhart testified "these fugitive dust emissions, if properly quantified and analyzed, would likely dwarf the emissions from the rock crusher and other processing equipment that were analyzed …"[12] This is certainly credible. Vulcan's modeling of the fugitive $PM_{2.5}$ emissions from the small stretch of roadways entering the crusher site reflected that those emissions were annually more than 14 times the annual emissions from the rock

---

9 Admin. R., Tab D, App. Ex. 22, pp. APP 000281-284.

10 APDG 6232, *Air Quality Modeling Guidelines* (2015).

11 Exh. Friends-100 (Gebhart direct testimony), p. 6:16-18.

12 Exh. Friends – 100 (Direct testimony of Howard Gebhart), p. 5:5-15.

crusher "facility," itself.[13] Vulcan's limited modeling indicated almost 76% of the $PM_{2.5}$ NAAQS would be consumed at at least one off-site receptor location.[14] This is calculated without consideration of the Vulcan quarry or any explicit consideration of the Martin Marietta quarry or of any of its roadways or of any emission sources beyond a 10 km radius. As documented in Friends' closing argument, the Cemex/Chem Lime, Brauntex Materials, Anderson Columbia, Lone Star Aggregates, Asphalt, Inc., Hunter Industries on Schoenthal Road, Servtex, Vulcan Materials (O'Conner), Bexar Concrete Works, some of the Martin Marietta Hwy. 281, Alamo Cement on Evans Road, Industrial Asphalt, Dean Word and Capital Aggregates on FM 482 open pit mines are all within 20 km of the proposed Vulcan rock crusher.

Failure to require modeling of the off-site impacts of emission sources that are not, themselves, "facilities" violated statutory and regulatory provisions, was in excess of the agency's statutory authority and was arbitrary and capricious. [15]

3. Failure to require in the emissions modeling inventory facilities and known stationary sources of emissions with, at the most limited radius, 20 kilometers

---

[13] Admin. Rec., Tab D, Exh. 22, internal p. 34, table; "Results of the Minor NSR Modeling Analyses."

[14] Admin. Rec., Tab D, Exh. 22, Table 1.

[15] Consequently, without limitation, Findings of Fact Nos. 21, 22, 23, 24, 25, 26, 32, 33, 41, 44, 45, 46, 48, and 49 were not supported by substantial evidence, violated the applicable statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious. Furthermore, without limitation, Conclusions of Law Nos. 5, 12, 14, and 15 were in excess of TCEQ's statutory authority, and were arbitrary and capricious.

Vulcan's full NAAQS air dispersion modeling explicitly included only emission sources within 10 km of the Vulcan site. This was justified, apparently, on the basis that it is what TCEQ staff had allowed.[16] There was no underlying logic or factual basis given for the opinion that 10 km is an appropriate radius. And, actually, TCEQ's Air Quality Modeling Guidelines (APDG 6232),[17] Appendix C, indicates that, for NAAQS analyses, 50 km is the radius from which sources' emissions are retrieved for modeling. The testimony from Vulcan's witness on the topic of the radius within which stationary emissions sources should be included in the emissions inventory was to the effect that radius was in accord with EPA's Guideline on Air Quality Models in 40 C.F.R. Part 51, Appendix W.[18] But, Appendix W does not recommend a 10 km radius. Appendix W indicates that nearby sources, so, sources that merit individual emissions modeling, will, in most cases, lie within 10 to 20 km of the source under consideration for permitting.[19]

TCEQ's failure to require that Vulcan include in the modeling inventory facilities and known stationary sources of emissions within, at the most limited radius, 20 kilometers was not reasonably supported by substantial evidence considering the reliable and probative evidence in the record as a whole and was arbitrary or capricious and characterized by abuse of discretion or clearly unwarranted exercise of discretion.[20]

---

[16] Exh. App-DK1 (Direct Testimony of David Knollhoff), p. 17:20-22.

[17] Admin. Rec., Tab D, Exh. 48.

[18] Exh. App-DK1 (Direct Testimony of David Knollhoff), p. 17:18-23.

[19] 40 C.F.R. Part 51, Appx. W, § 8.3.3(b)(iii).

[20] Consequently, without limitation, Findings of Fact Nos. 21, 22, 23, 24, 25, 26, 32, 33, 38, 41, 44, 45, 46, 48, and 49 were not supported by substantial evidence considering the

4. Failure to undertake or to require Vulcan to undertake a case-by-case "Best Available Control Technology ("BACT")" analysis of the emission sources that are concededly facilities

In this docket, TCEQ apparently acted in accord with the understanding of the Vulcan that "a permit applicant, such as Vulcan, is not required to consider whether a emissions control would be BACT, when a different emissions control has previously been determined to be Tier I BACT, unless there has been a subsequent technical development that may indicate that a more stringent emission control is technically practicable and economically reasonable."[21]

BACT says what it means: "Best" Available Control Technology that is considered technically practical and economically reasonable for the facility.[22] It is not just a technology (level of control, really[23]) that was found to be adequate for another similar facility in the past.

The agency's guidance document on evaluating BACT demonstrations is clear that a case-by-case evaluation of the circumstances of the particular facility is required. "The permit reviewer must ensure that the administrative record

---

reliable and probative evidence in the record, violated the statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious. Furthermore, without limitation, Conclusions of Law Nos. 5, 12, 14, and 15 were in excess of TCEQ's statutory authority, and were arbitrary and capricious.

[21] Exh. App-GN1, p. 27:17-29.

[22] 30 TAC § 116.10(1) and § 382.0518(b)(1), Tex. Health & Safety Code.

[23] "BACT may be expressed in terms of an emissions limit (e.g., as a pound per hour or ton per year number), or a performance criterion (e.g., a percentage destruction efficiency or pound per million British Thermal Units [lb/MMBtu])." Exh. ED-8 (APDG 6110, *Air Pollution Control, How to Conduct a Pollution Control Evaluation*), p. 3.

provided by the applicant for the selected BACT is sound, comprehensive, and adequately supports the conclusions of the BACT review. *Failure to consider all potentially applicable control alternatives constitutes an incomplete BACT analysis*." (emphasis added.) It also says,[24] in reference to the Texas BACT Tier 1 analysis, "The TCEQ has established Tier I BACT requirements for a number of industry types. This information can be accessed at the TCEQ website. *However, these BACT requirements are subject to change through TCEQ case-by-case evaluation procedures*." (Emphasis added.) Later, the document provides:[25] "BACT proposals are approved on a case-by-case basis. While a *specific BACT proposal may be different than those accepted as BACT in recent permit reviews*, the proposal must have an overall emission reduction performance that is at least equivalent to those previously accepted as BACT." (emphasis added.)

TCEQ's failure to undertake or to require Vulcan to undertake a case-by-case BACT analysis of the to-be-permitted emission sources that are concededly facilities violated the statutory and regulatory provisions, was in excess of the agency's statutory authority and was arbitrary and capricious. [26]

---

[24] Exh. ED-8, p. 12.

[25] Exh. ED-16.

[26] Consequently, without limitation, Findings of Fact Nos. 21, 27, 29, 30, 31, and 38 were not supported by substantial evidence, violated the statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious. Furthermore, without limitation, Conclusions of Law Nos. 5, 11, 12, 14, and 15 violated statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious.

5. Failure to conduct or to require Vulcan to conduct an analysis of the impacts on the public's health and physical property of diesel engine exhaust as particulate matter

The Vulcan rock crusher would include three diesel fuel fired engines, which would emit exhaust, including carbon monoxide, nitrogen oxides, sulfur dioxide and particulate matter.[27] Diesel engine exhaust is carcinogenic to humans.[28]

TCEQ has established "effects screening levels" for diesel engine exhaust as particulate matter.[29] Ground-level concentrations of a pollutant in excess of its screening level may or may not be cause for concern, ultimately. But, if the ground-level concentration of a contaminant exceeds its screening level, more evaluation, per TCEQ guidance, of the health impacts of the presence of the contaminant in that level must be undertaken.

Here, neither Vulcan nor the agency determined maximum ground level concentrations of diesel engine emissions as particulate matter using the accepted protocol of applying emission factors provided by the engine manufacturer or the EPA. Without knowledge of the ground-level concentrations of diesel engine exhaust emissions as particulate matter, there could be and there was no showing that ground level concentrations would have no adverse impacts on the public's health and physical property.

---

27 Administrative Record p. APP-000022, Friends Ex. 200, p. 12 (Prefiled testimony of Dr. Thomas Dydek).

28 Friends Ex. 200, p. 12-13 (Prefiled testimony of Dr. Thomas Dydek).

29 Friends Ex. 200, p. 12(Prefiled testimony of Dr. Thomas Dydek).

The failure TCEQ to conduct or to require Vulcan to conduct an analysis of the impacts on the public's health and physical property of diesel engine exhaust as particulate matter violated the statutory and regulatory provisions, was in excess of the agency's statutory authority and was arbitrary and capricious.[30]

6. Order No. 2's bar of discovery necessary for an adequate presentation of Friends' case, and subsequent limitation of cross-examination and denial of motion to conduct additional discovery related to undisclosed discoverable consulting expert.

A significant contested issue in this docket was the crystalline silica content of the rock to be crushed and whether that content would lead to emissions of crystalline silica that would be a threat to the public's health and physical property. In pursuit of discovery that would allow Friends to determine the crystalline silica content of the rock to be crushed at the Vulcan site, Friends served timely pre-trial production requests seeking (request no. 4):

> all documents associated with any subsurface investigation performed within the Facility Property. This request includes, without limitation:
> a. All boring logs for any boring within the Facility Property;
> b. All field notes for ay boring within the Facility Property;
> c. All Drillers notes associated with any boring within the Facility Property; and
> d. All sampling results for any sample collected within the Facility Property.

---

[30] Consequently, without limitation, Findings of Fact Nos. 21, 22, 23, 25, 26, 32, 33, 38, 48, and 49 were not supported by substantial evidence considering the reliable and probative evidence in the record, violated the statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious. Furthermore, without limitation, Conclusions of Law Nos. 5, 12, 14, and 15 were not supported by substantial evidence considering the reliable and probative evidence in the record, violated statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious.

Request for production number 5 requested "all documents related to any analysis or evaluation of the characteristics of the materials which Vulcan intends to process at the Facility."

Vulcan asserted a “trade secret” objection to this request and refused to produce any responsive material, even under a protective order. Friends moved to compel production. Ultimately, the ALJ ruled in Order No. 2 that the information was “trade secret” information, the nondisclosure, even under a protective order, of which would not work an injustice. On the injustice question, the order provided:

> [i]t does not appear that nondisclosure will work injustice. However, it would create an injustice if Applicant were allowed to use the privileged information in any way as part of the additional evidence in support of the permit. Applicant's additional evidence may not rely on any responsive information that was not produced, and Applicant may not cross-examine using that information, either.

At hearing, Friends’ counsel attempted to develop some bases for evaluating the Vulcan position that the crystalline silica concentrations of the rock to be crushed. Vulcan’s witness regarding the geology at the site, Dr. Eversull, testified that she had in fact “certainly” reviewed many of the materials which had been withheld as trade secret material,[31] and that there was “a lot of communication” between herself and the person who had created much of the material withheld as trade secret.[32]

Dr. Eversull said photographs of the drilled core material or drilling logs from those coring efforts were not the “sole basis” for her opinion that Vulcan’s sampling of

---

[31] Tr. V. 1, 163-164.

[32] Tr. V. 1, 165.

the material to be quarried was properly done and, thus, yielded "representative" crystalline silica values. Asked if the photographs or drilling logs provided some of the basis for her "representativeness" opinion, Dr. Eversull answered: "Do the core logs that I may or may not have looked at or the photographs that I may or may not -- I feel like you're asking me to say that something I've said -- I can't remember if I saw every photo, and you're asking me if that was the basis for my opinion, and I -- I can't swear that I saw every photo or every page of the handwritten log."[33] This level of evasiveness could have been countered, memory could have been refreshed, had counsel for Friends had the discovery material Friends properly sought and that Order No. 2 denied. As counsel for Friends sought to further explore the role of the withheld material in the formation of her opinion despite the witness' evasive answers, counsel for Vulcan objected, and the judge instructed Friends' legal counsel that, "I think we should move on."[34] This decision to cut off questioning seeking to identify the role of the privileged material was in error, was a violation of constitutional and statutory provisions guarantying litigants in administrative proceedings the rudiments of fair play and a true adjudicatory proceeding, and was arbitrary or capricious or reflected the abuse of discretion.

Friends also had submitted Interrogatory No. 4, asking that Vulcan identify all discoverable consulting witnesses whose work had been reviewed or may be relied upon

[33] Tr. V. 1, 166-167,

[34] Tr. V. 1, 168.

by a testifying expert,[35] and Request for Production No. 1, seeking all documents that had been provided to, reviewed, or developed for a consulting expert whose impressions or opinions had been reviewed by a testifying expert.[36] Vulcan did not assert the trade secret privilege in response to these requests, but, rather, said that it had no documents response to Request for Production No. 1, and asserted that it had no information responsive to Friends request for the identification of all discoverable consulting experts by Interrogatory No. 4.[37]

Furthermore, under cross-examination at the hearing, Dr. Eversull testified that her opinions expressed in the matter were based partly upon her reliance on the expertise of Ms. Cummings -- the person who performed much of the work that had been withheld pursuant to the trade secret privilege and with whom Dr. Eversull had had numerous conversations apparently regarding the nature of the geology at the site.[38] This reliance was contrary to Vulcan's prior representations during the discovery process, in which Vulcan had claimed that it had no consulting experts whose opinions had been reviewed by its testifying experts.[39] In light of this testimony regarding Dr. Eversull's reliance upon the opinions of a consulting expert, counsel for Friends Protestants moved for a

---

[35] Friends Ex. 502, p. 8.

[36] Friends Ex. 502, p. 10.

[37] Friends Ex. 502, pp. 8 & 10.

[38] Tr. V. 1, 180.

[39] Friends Ex. 502.

continuance in order to obtain and review the material asserted to be trade secret.[40] That motion was denied.[41] The denial of that motion was in error, was a violation of constitutional and statutory provisions guarantying litigants in administrative proceedings the rudiments of fair play and a true adjudicatory proceeding, and was arbitrary or capricious or reflected the abuse of discretion. Not only was the material improperly shielded as trade secret material, but it was improper for the judge, and by extension the TCEQ, to allow the withholding of material response to Friends Protestants' Interrogatory No. 4 and Request for Production No. 1, as the trade secret privilege had not been timely raised in response to those discovery requests.

As a matter of law, the Order No. 2 shielding of this dubiously-"confidential trade secret" information created an injustice, in that it deprived Friends of information necessary for an adequate presentation of Friends' case. Order No. 2 resulted in a violation of constitutional and statutory provisions guarantying litigants in administrative proceedings the rudiments of fair play and a true adjudicatory proceeding, and Order No. 2, as well as the rulings identified herein at the hearing on the merits, were arbitrary or capricious or reflected the abuse of discretion.[42]

---

[40] Tr. V. 1, 182-183.

[41] Tr. V. 1, 215.

[42] Consequently, without limitation, Findings of Fact Nos. 21, 22, 23, 24, 25, 26, 32, 33, 45, and 46 were not supported by substantial evidence, violated the statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious. Furthermore, without limitation, Conclusions of Law Nos. 12, 13, 14, and 15 violated statutory and regulatory provisions, were in excess of TCEQ's statutory authority, and were arbitrary and capricious.

Summary of Erroneous Findings and Conclusions

For reasons explained, above, the following findings of fact in the Commission's November 21, 2019, final order are in error.

Findings: 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 38, 39, 41, 44, 45, 46, 48, and 49.

Conclusions: 5, 11, 12, 13, 14, and 15.

Additionally, as noted above, the ALJ's Order No. 2, and the rulings at the hearing limiting cross-examination regarding the withheld material, and denying Friends' request for additional material, were in error.

Conclusion and Prayer

In light of the foregoing deficiencies in Vulcan's permit application and in the evidence necessary to support the § 382.0518(b) findings the Commission must make and in the process – as distorted by Order No. 2 – that led to this Commission's November 21, 2019, final order, Protestant Friends prays the Commission rehearing that decision and, on rehearing, deny Vulcan's permit application.

Respectfully submitted,

/s/ David Frederick
David Frederick
State Bar No. 07412300
Eric Allmon
State Bar No. 24031819

FREDERICK, PERALES, ALLMON & ROCKWELL, P.C.
1206 San Antonio
Austin, Texas 78701
512-469-6000 (t)
512-482-9346 (f)
ATTORNEYS FOR FRIENDS OF DRY COMAL CREEK AND STOP 3009 VULCAN QUARRY

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was filed at TCEQ on December 16, 2019, and served electronically to the parties below.

/s/ David Frederick
David Frederick

Nicolas Parke or his successor Staff Attorney Texas Commission on Environmental Quality Environmental Law Division MC-173 P.O. Box 13087 Austin, Texas 78711-3087 nicolas.parke@tceq.texas.gov	OFFICE OF THE EXECUTIVE DIRECTOR
Pranjal Mehta Texas Commission on Environmental Quality Public Interest Counsel MC-103 P.O. Box 13087 Austin, Texas 78711-3087 pranjal.mehta@tceq.texas.gov	OFFICE OF PUBLIC INTEREST COUNSEL
Derek Seal Winstead PC 401 Congress Avenue, Suite 2100 Austin, TX 78701 Phone: (512) 370-2807 Fax: (512) 370-2850 dseal@winstead.com	VULCAN CONSTRUCTION MATERIALS, LLC
Milann Guckian bgr@gvtc.com	FOR EMAIL TO THE ALIGNED PARTIES: GREATER EDWARDS AQUAFIER ALLIANCE, DONNA H. GIBSON DELL (TRUSTEE), SMITHSON VALLEY HERITAGE OAKS PROPERTY OWNERS ASSOCIATION, ZUERCHER-FROBOESES FAMILY RANCH and SELF-REPRESENTED

PARTIES: Michael L. Maurer, Ora Lee Frisch, Nathan & Kira Olson, Jack Olivier, Jim & Joyce Doyle, Bob & Jeanne Nebergall, Bruce & Grace Murphy, John P. Mooney, Stephan & Jane Johnson, Sheryl Lynn Mays, Keith & Susan Randolph, Ted Martin, James & Linda Martin, Chris Lupo, Claire H. Loomis, James & Gladys Kuhn, Chuech Kuentz, Judy Krup, William & Linda Mohr, Lara Stonesifer, Mike Zimmerman, Michael Wilkinson, Ronald J. Walton, Michael & Terry Olson, Jack & Trudy Striegel, Peggy Pueppke, Mike Stemig, James Shipley, Gerald & Tracy Schulke, Esther Scanlon, Josh & Jakki Saul, Gaspar & Anna Rivera, Jeff Reeh, Chris M. Hoppman, Mary Ann Trujillo, Renee Wilson, Richard C. Keady, Robert Carrillo, Windell Cannon, William K. Byerley, Ron & Elaine Bigbee, Michael & Deborah Bell, Yvonne R. Arreaga, Thomas & Kathleen Chaney, Mark & Betty Abolafia-Rosenzweig, Lorraine DelaRiva, Pamela Seay, Craig Johnson, Kenneth & Diane Higby