

Mr. Hearing Officer, members of the EIB,

We moved to our home 22 years ago because we were attracted by the bucolic nature of the area and its minimal commercial activity.

Our home is located just over 1/2 mile from the proposed plant site, downwind from it. Because of that extra 264 feet, we never received notice of Roper's intentions until we were notified by friends. I guess that isn't important because many people living within the 1/2 mile perimeter also weren't notified, a fact which was dismissed during the February Public Hearing. I heard a *sotto voce* comment during that hearing, "Well, at least he tried."

I cannot object strenuously enough to placing such an industrial polluter into this area because:

1. Components in the fugitive dust from the plant, such as respirable airborne silica which causes inoperable silicosis, are fatally harmful to residents and wildlife.
2. Roper has stated it is his plan to use water to suppress fugitive dust though he has never identified how he would do that or what will be the source. The runoff from that activity will contaminate the groundwater and likely will render my private domestic well unusable for consumption.
3. There aren't adequate local resources to support such activity, especially water.
4. The continuous noise from the operation of the plant will provoke stress to all the residents in the area.
5. NMED AQB accepted egregiously wrong data regarding wind

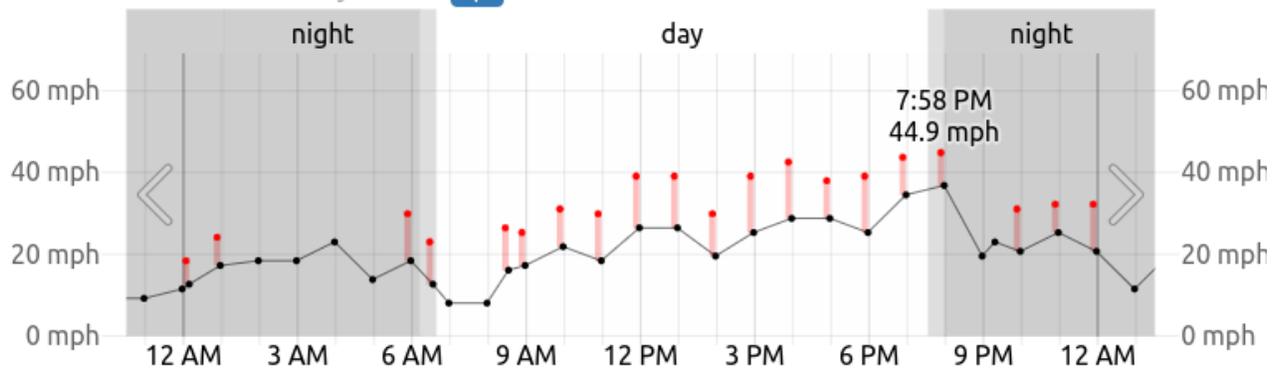
velocities submitted by Roper's experts and assumed Holloman AFB data to be the same as Sierra Blanca Airport which differ by over 3,000 ft in elevation and have vastly different terrains and topographies.

A recent example of the falsity of this assumption: on April 12, 2022, the start date of the McBride Fire, the maximum wind speed recorded at Holloman was 34.5 mph gusting to 43.7 mph.

At Sierra Blanca Airport, maximum wind was 55.2 mph gusting to 71.3 mph.

#### Wind Speed on Tuesday, April 12, 2022 at Holloman Air Force Base

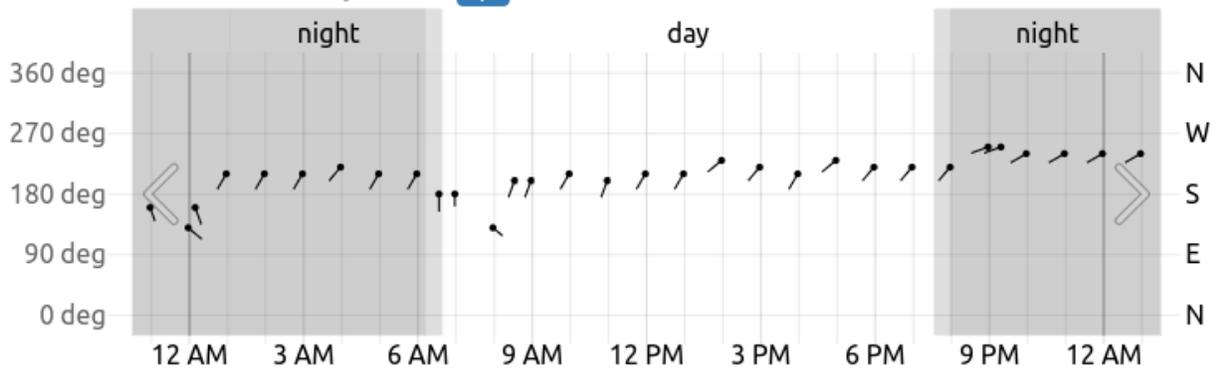
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History: J F M **Apr** M J J A S O N D 2021 2020 2019 2018



Measured wind speed at approximately 10 meters above an open field (black dots). Civil twilight and night are indicated by shaded overlays.

#### Wind Direction on Tuesday, April 12, 2022 at Holloman Air Force Base

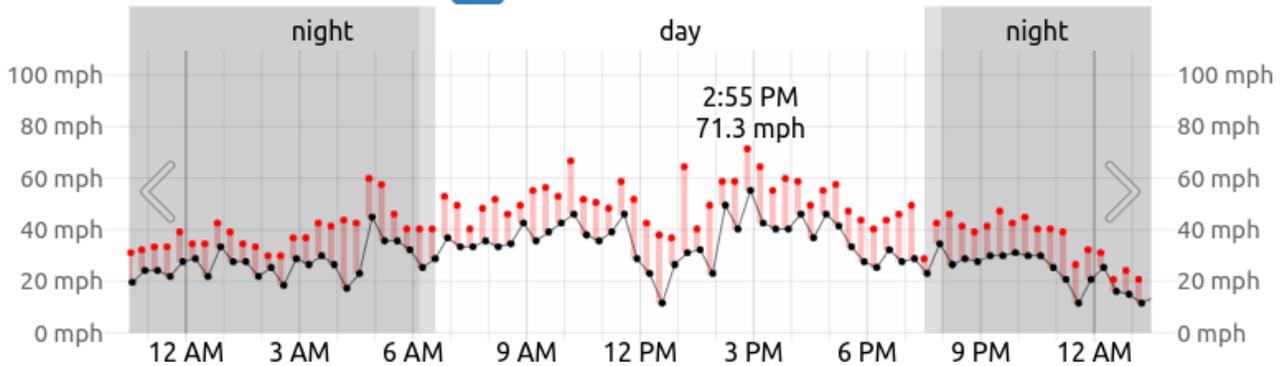
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History: J F M **Apr** M J J A S O N D 2021 2020 2019 2018



Measured wind direction at approximately 10 meters above an open field (black dots). Civil twilight and night are indicated by shaded overlays.

### Wind Speed on Tuesday, April 12, 2022 at Sierra Blanca Regional Airport

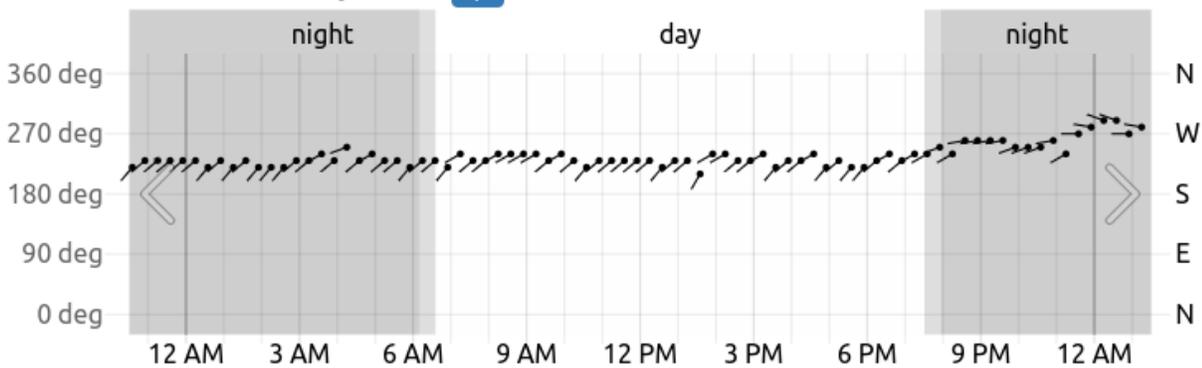
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History: [J](#) [F](#) [M](#) [Apr](#) [M](#) [J](#) [J](#) [A](#) [S](#) [O](#) [N](#) [D](#) [2021](#) [2020](#) [2019](#) [2018](#)



Measured wind speed at approximately 10 meters above an open field (black dots). Civil twilight and night are indicated by shaded overlays.

### Wind Direction on Tuesday, April 12, 2022 at Sierra Blanca Regional Airport

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NMED AQB is a moving target regarding what is and is not approved and has recently released, without notification, a **revised** Draft Permit which is radically different from the previous draft permit that was denied by the Secretary. Roper has been allowed to revise his initial application more than 20 times with impunity. It appears AQB is either incapable of evaluating or simply doesn't care about accuracy or quality of data submitted on an application but, in my opinion, they will defend to the death their objections to conducting a proper review.

The reporting requirements in the draft permit(s) are not quantitative. For the most part they are subjective observations of “visible” fugitive emissions or statements like “We looked at this or that and it looks OK” reports. There are no measurement instrumentation requirements, no validation, and NO inspections.

It is a fact that the extent of monitoring of so-called “minor source” facilities by NMED consists of recording the receipt of monthly reports from plant operators.

I know this because Roper's Carrizozo facility has never been monitored, audited or inspected by NMED according to their own records. We asked for such records and were told there are none. It should be noted that NONE apparently also includes reports submitted by the plant operator(s).

Reversing the denial of any permit for this plant would put the lie to NMED's Mission Statement, as authorized by Secretary Kenney at the nm.gov website which reads, in part:

"Our mission is to **protect and restore** the environment and to foster a **healthy** and prosperous New Mexico for present and future generations. ... We use the best available science to inform our decision-making in protecting public health and the environment." (Emphasis added)

(ref: <https://www.nm.gov/departments-and-agencies/environment-department/> )

I urge you to reject Roper's appeal and uphold the Department's decision to deny Air Quality Permit and halt this attempt to do irreparable harm to our fragile environment.

--Doug Thompson, Alto, NM