

Mark Severance

The attached file from the February 2022 hearing on the proposed Alto concrete batch plant is being resubmitted to the EIB to highlight the health concerns expressed by members of the Alto community should the plant be allowed to operate. I would like to call the Boards attention specifically to the following comments: I-2, I-4, I-5, I-16, I-23, I-27, I-40, I-47, I-51, I-56, I-61, I-76, I-91, I-98, I-105, I-122

Additionally comment I-15 provides a summary of medical issues arising from prolonged exposure to emissions from concrete batch plants, as cited in published medical journals.

Lastly, comment I-118 describes the impact of silica dust emissions on people and areas in proximity to a concrete batch plant, as observed by the quality control manager of a concrete plant in the El Paso area.

Thank you for your thoughtful consideration of this material.

I-1: Sharon Stewart

Address: 113 Sugar Bush
City: Alto
State: NM
Submit Date: 01/24/2022 2:06 PM
Submit Method: Website

Comment I-1-1

The dust and caustic chemicals this plant will spew into the air will dramatically alter the health of the individuals who live here, most of whom are elderly and many who already have lung issues. I had a heart attack 14 years ago at the age of 50 and my breathing capabilities have been limited since that occurrence, even after rehabilitation.

I-2: Sandra Lewis Davis, DC ND

Address: 147 Hidden Valley Road
City: Alto
State: NM
Submit Date: 01/24/2022 3:32 PM
Submit Method: Website

Comment I-2-1

I have diagnosed COPD Chronic Obstructive Plumonary Disease. As an educated, degreed physician, I am uniquely knowledgeable of the documented medical treatise that state "Crystalline Silica" causes both irreparable damage to the lungs and lung CANCER. Evidenced by this article by the National Institutes of Health, <https://ntp.niehs.nih.gov/ntp/roc/content/profiles/silica.pdf> This article calcs crystalline a carcinogen and/or causes respiratory destruction, COPD, emphesema, etc. The proposal to spray water, night and day to settle the silica is beyond ludicrous. It will not work. If the wind blows (which is does daily with gusts to 70-80 mph) the water spray is a waste of good irreplaceable water. And speaking of water (my property has a well for drinking water), Spraying water into the air does nothing but further deplete the water table and washes all the silica into the air and ground water table. The Silica will coat the plants, poison the wildlife, poison the people, poison the air and poison the water table.

I-4: Kristine Felker

Address: 210 Pueblo Loop
City: Alto
State: NM
Submit Date: 02/02/2022 2:30 PM
Submit Method: Website

Comment I-4-1

I have stage 4 metastatic ovarian cancer. I have managed to stay alive beyond the 16 months I was given to live upon diagnosis 2 and a half years ago. If the cement plant is built in our small town, with the carcinogens released into the water table and into the air, I will not be able to live there any longer!

I-5: Lynn Budd

Address: 152 Sun Valley Rd

City: Alto

State: NM

Submit Date: 02/03/2022 12:52 PM

Submit Method: Website

Comment I-5-1

I have severe asthma per my physician and live here because of the clean air. There are very dangerous particulates made during the process of making cement that are NOT captured by any currently available filters.

I-10: Sandra Lewis Davvis DC ND

Address: 147 Hidden Valley Road

City: Alto

State: NM

Submit Date: 02/05/2022 2:38 PM

Submit Method: Website

Comment I-10-2

Air pollution, dangerous traffic congestion caused by slow moving truck use of highways turning and going at a major intersection of 2 Hwys, (Hwy 49 and Hwy 220), noise from the highways caused by big trucks, heavily loaded running 18 hours a day, wildlife inhabitant adversely effected with loss of plant life, clean air, pure water and covered in crystalline silica. Local population health adverse effects from the crystalline dust as a cancer causer and constant air pollution causing increased incidents of COPD, children's asthmas and allergies, reduced quality of life caused by an totally illegal proposition for a heavy industry plant.

I-11: Christopher Loyd

Address: 106 Vail Loop

City: Alto

State: NM

Submit Date: 02/05/2022 3:38 PM

Submit Method: Website

Comment I-11-1

Particulate matter produced by a Concrete Batch Plan (CBP) is linked to serious health conditions, including reduced lung development in children, higher rates of asthma, bronchitis, heart disease and cancer. Volatile organic compounds (VOCs) are also a problem at concrete batch plants, VOCs can irritate the eyes and respiratory system and cause shortness of breath, headaches, fatigue, skin problems and impair the memory. Clinical studies have shown that higher concentrations of VOCs can even damage the liver, kidney and brain. The Environmental Defense Fund (EDF) has stated "you are exposed to higher levels of harmful pollution as the pollution from a concrete batch plant can be comparable with the pollution along a congested freeway". Additionally a CBP is the third largest emitter of mercury.

Mercury is not the only toxin coming out of the CBP. They also emit things like ammonia, benzene, certain glycol ethers, chromium, diethanolamine, dioxin and dioxin-like compounds, ethylene glycol, lead, manganese, sulfuric acid, and zinc compounds. We just recently purchased our home in Alto because of the beauty and the clean fresh air. We do not want to live near one of these facilities as my wife has asthma and has difficulty breathing. As a owner of property and resident of this community I demand that they permit be denied.

I-12: Stanley Mathis

Address: 399 New Mexico 220

City: Alto

State: NM

Submit Date: 02/07/2022 3:20 PM

Submit Method: Website

Comment I-12-1

This batch plant will add enormous amounts of dust particles and pollutants to our air. The carcinogenic crystalline silica can cause lung damage, COPD, kidney disease as well as cancer. Add the diesel fumes from the trucks moving the concrete 18 hours a day and you add sulfur dioxide, carbon monoxide and nitrogen oxide to the pollution.

I-15: Michael Miller, M.D. F.A.C.S.

Address: 2946 E. Banner Gateway Drive, Ste. 450

City: Gilbert

State: AZ

Submit Date: 02/07/2022 6:32 PM

Submit Method: Website

Comment I-15-1

There are significant health risks to children and adults living in proximity to concrete batch plants associated exposure to particulate matter and volatile chemicals found in wind-blown concrete dust. Exposure to airborne concrete dust causes irritation of the eyes, skin, throat, and upper respiratory tract, especially in sensitive individuals. Up to 30% of cement dust is composed of crystalline silica, invisible particles less than 5 micrometers in size (Gharpure, Heim et al. 2021). Silica is a carcinogen (Shahbazi, Morsali et al. 2021), and inhaling microparticles can lead to incurable lung disease (silicosis) (Reynolds and Jerome 2021) and to lung cancer. People with prolonged exposure to cement dust have a higher incidence of lung cancer compared to the general population (Houot, Homere et al. 2021). The risks are such that the Occupational Health and Safety Administration (OSHA) imposes strict safety regulations for on-site workers. Workers with significant exposure must wear personal protective equipment such as gloves, goggles, and even HEPA filter respirators. Unfortunately, the safety regulations do not apply to people living in proximity to concrete plants. One study found that children living and attending school in an urban area exposed to cement plant emissions show a chronic bioaccumulation of toxic metals. The authors of conclude that primary prevention policies are needed to protect children's health from cement plants emissions. (Di Ciaula 2021) In summary, it is essential to not allow the concrete batch plant to be built at the proposed location on Route 220 in Lincoln County in proximity to residential and recreational areas, including a children's camp. It would pose and unacceptable and unnecessary risk to health.

References: Bertoldi M, B. A., Tittarelli A, Fattore E, Cau A, Fanelli R, Crosignani P. (2011). "Health effects for the population living near a cement plant: an epidemiological assessment. .

Comment I-15-2

The wind carries cement dust particulates many miles from the work site. At times they can't go outside or have friends over (West 2020). Wind-blown crystalline silica causes increased incidence of lung and laryngeal cancer in people living within 3 kilometers of concrete batch plants (Eom, Cho et al. 2017). In addition to the increased risk of cancer, exposure to plant emissions is associated with increased risk of hospital admission for cardiovascular or other respiratory disorders, particularly in children (Bertoldi M 2011). Children are especially vulnerable to exposure hazards.

I-16: William & Penelope Horton

Address: 114 Legacy Lane

City: Alto

State: NM

Submit Date: 02/07/2022 6:36 PM

Submit Method: Website

Comment I-16-1

My wife, Penelope, was diagnosed with Reactive Airway Disease prior to us moving to our home in August 2007. Within 2 years living here, her breathing issues basically disappeared due to the clean air the area has afforded. The inevitable fugitive dust from a CBP will be very detrimental to her health, almost certainly making our home unlivable for us. When the wind isn't blowing (most common in the summer and early fall), the fugitive dust will simply billow out to fill this bowl, then begin to spill over the edges of the bowl.

Comment I-16-2

NMED should be concerned about ground water contamination resulting from the CBP operation. Water sources such as Little Creek are as close as 1/3rd mile away. Little Creek and the Rio Bonito, located to the north of the CBP proposed location, seems to be the major source of water for the Fort Stanton/Snowy River cave system. Both sources stand to be imperiled by contamination and runoff from the CBP. The water that will be required to attempt mitigation of particle emissions on top of that required to produce 125 cubic yards of concrete per hour simply cannot be supported by available ground water. The entire Hondo Basin is presently undergoing severe drought related stress to the point of wells in the area experiencing no to reduced flows and must be drilled deeper or replaced. More specifically, it is highly doubtful that spraying material on the ground at the plant will mitigate fugitive emissions.

I-18: Barbara Yount

Address: 147 Legacy Lane

City: Alto

State: NM

Submit Date: 02/08/2022 11:17 AM

Submit Method: Website

Comment I-18-1

NMED staff have told me that measures will be taken, including "wet dust suppression"-to prevent "visible dust" from crossing the property line. It is not the "VISIBLE" we fear, but the "INVISIBLE." Respirable silica dust is 1/100 the size of a grain of beach sand. This invisible silica dust, when inhaled, bypasses our body's defenses and goes straight to our lungs, creating scars in the delicate lung fibers that can never be repaired and may eventually lead to terminal silicosis. It also exacerbates asthma, heart and lung diseases.

I-19: Deborah Sheehy

Address: P O Box 169

City: Alto

State: NM

Submit Date: 02/08/2022 11:32 AM

Submit Method: Website

Comment I-19-1

the plant will run 18 hours a day 7 days a week starting at 3:00 am with bright lights, loud equipment and air pollution in addition to using 80,000 gallons of water a DAY . That water, polluted with concrete residue and other toxic chemicals will undoubtedly run off their property. This area is also in a drought stricken area of the state. Private wells are the only source of water for the residents in this area . This enterprise, if allowed to draw on the existing groundwater, will present a danger of severe depletion of that natural resource in an already drought stricken area of the state. Estimates of the water to be used are 80,000 gallons a DAY! Even if Roper trucked in the water, the resulting runoff from the plant will undoubtedly harm the land, the streams, the caves, the vegetation, the air and the residents and visitors.

Comment I-19-4

I suffer from two autoimmune disorders which can be affected by air and water pollution.

I-22: Joshua Botkin

Address: 125 HWY 220

City: Alto

State: NM

Submit Date: 02/08/2022 2:38 PM

Submit Method: Website

Comment I-22-1

Well water, and even city water, is harmful to the germination process of seedlings and the vegetation of mature plants. Whole crops of plant materials have been lost due to high TDS concentration from both of those water sources in the past. Any amount of silica dust, or any dust of any nature, that could befall onto the catchment systems, through normal day-to-day operation of the CBP next door, will be detrimental.

I-23: Michael Budd

Address: 152 Sun Valley Rd

City: Alto

State: NM

Submit Date: 02/08/2022 4:57 PM

Submit Method: Website

Comment I-23-1

My wife and I live near the proposed concrete batch plant. She has severe asthma per her physician and lives here because of the clean air. Should the batch plant be allowed to be constructed, we will sell this home. We cannot live in an area where there are dangerous particulates in the air such as a cement batch plant would produce. There are very dangerous cancer-causing particulates made during the production of cement that are NOT captured by any currently available filters, wet or dry. Again, there is NO WAY TO CAPTURE ALL THE UNHEALTHY PARTICULATES PRODUCED. That technology does NOT exist. It would be severely harmful to her health to continue living here, to even visit occasionally. We will be sadly forced to sell because of these dangerous particulates.

I-27: Charles Dixon

Address: PO BOX 416

City: ALTO

State: NM

Submit Date: 02/09/2022 12:11 AM

Submit Method: Website

Comment I-27-2

I was recently fortunate enough to have a healthy kidney transplanted into my body. I do all possible to avoid pollutants in order to protect this precious kidney that saved my life. My current quality of life is exponentially better than what I was experiencing and my life expectancy is much greater. Then someone will be allowed to dump toxicants from his plant all over my neighbors and me. I cannot believe this is possible. The pollutants would certainly lead to decline in my kidney function, dialysis with a very poor quality of life, possibly another transplant if I survive long enough or death. Others in the area suffer from similar ailments.

I-33: William & Penelope Horton

Address: 114 Legacy Lane

City: Alto

State: NM

Submit Date: 02/09/2022 11:25 PM

Submit Method: Website

Comment I-33-1

Hello: We are providing additional comments regarding the application by Roper Construction for a permit to operate a concrete batch plant (CBP) near the intersection of Highways 48 and 220 in Alto, NM. We appreciated the opportunity to participate in the hearing held 9 February 2022 and present our views.

These comments relate to the topics addressed at that hearing. The first issue related to the concept of "enforcement" as stated by representatives of NMED. Repeatedly we heard this term used regarding requirements stated in the draft approval affecting daily operations of the CBP. For instance, round trip truck traffic being limited to 305 daily, requirements to water aggregate piles for dust suppression, etc. However, there was never any mention of how the operator would be held accountable to comply with these directives. Maintaining daily logs of truck traffic were mentioned, but to whom they would be sent and how they could confirm the authenticity of these logs was not. Regarding the use of water for emission suppression, absolutely nothing regarding a check for compliance was addressed. So, the way NMED seems to define "compliance" is actually a reference to statutory requirements that the CBP operator must meet. But there is no means to enforce these requirements. There is no measurement of emissions planned for this site (certainly none were mentioned). Clearly NMED will not station their personnel outside the CBP to check compliance with the truck limits per day. So, exactly how is actual compliance to be enforced? This is much akin to the situation we see in many of our larger cities across the country today, including Albuquerque. We have laws on the books specifying what can and can't be done (what NMED calls "enforcement"). However unless violators are apprehended, the prosecutors prosecute, and the courts convict, there is no enforcement! Where are the police, district attorney, and court equivalents for air quality violations? We have tried, as have others in our community, to determine the record for Mr. Roper's CBP in nearby Carrizozo, NM. I personally have asked for copies of past violations from NMED, but there are none. But this does not mean he has a clean record since we cannot find any evidence his Carrizozo site has ever been monitored or inspected! No surprise that there's no record of past violations. The bottom line seems to be a gigantic, and totally unacceptable, "trust me". Are we not allowing the fox to guard the hen house? This might be laughable were it not for the fact that people's lives, quality of life, and property values are at stake, not to mention irreparable harm to wildlife, a cave system, ground water, etc. If a few years down the road an unexplained increase in deaths, lung disease, etc. is noted, and the only plausible explanation is the CBP? Does NMED simply say "Oops"?

The second issue relates to the vast amount of testimony regarding modeling to determine compliance of the alto CBP with air standards. Much time and energy was devoted to use of terrain and meteorologic data. No clear answers emerged other than the fact that data specific to our high altitude, mountainous area were not used. This simply doesn't pass the "giggle test". A fifth grader would know that modeling our terrain (7,000+ feet AGL, located in a basin surrounded by high hills/mountains) can't be adequately modeled using data for flat terrain and at roughly 3,000 feet lower. Temperature, wind, and relative humidity will be greatly different. But perhaps most of all, it fails to address the impact of micro-climates in our area. I have had a weather station on our property most of the 14.5 years we have lived here (660 feet from the CBP proposed location). I routinely see wind speed, direction, and barometric pressure readings here that are very different from the local airport. I also check other on-line reporting stations in the area and see the same. This is a phenomena not generally seen in open, flat terrain, such as in Alamogordo/Holloman Air Force Base, NM. NMED needs a model that can account for these factors, and usable meteorological data from a comparable area for any modeling results to be even considered. Does NMED have such data? Can the model they require be used handle the impacts of elevation, micro-climates, etc.? If so, no one speaking on behalf of NMED or the applicant mentioned it. I (William) know something about modeling since I was called on in my profession as a systems engineer to develop and perform modeling. Having a model is useless unless it can be properly calibrated. Otherwise, it's "garbage in, garbage out". Has NMED ever collected air quality data from a CBP plant operating at a similar elevation and topology as ours and compared it to the model results, and if so, did they agree? If not, I submit your model is worse than worthless. No meaningful results are possible. We do not wish to risk our health, indeed our lives, to such a tool, nor should we be required to do so. As a result, we have no confidence that the measures that NMED will require for operating this CBP will actually be enforced. Nor do we believe NMED has a model and appropriate data to have any realistic clue what the actual air emissions will be. The only viable option we see is for NMED to reject this permit. Respectfully, William F. Horton, Jr. (575) 336-8382 (wbillhorton@yahoo.com) Penelope S. Horton

Comment I-33-3

The second issue relates to the vast amount of testimony regarding modeling to determine compliance of the alto CBP with air standards. Much time and energy was devoted to use of terrain and meteorologic data. No clear answers emerged other than the fact that data specific to our high altitude, mountainous area were not used. This simply doesn't pass the "giggle test". A fifth grader would know that modeling our terrain (7,000+ feet AGL, located in a basin surrounded by high hills/mountains) can't be adequately modeled using data for flat terrain and at roughly 3,000 feet lower. Temperature, wind, and relative humidity will be greatly different. But perhaps most of all, it fails to address the impact of micro-climates in our area. I have had a weather station on our property most of the 14.5 years we have lived here (660 feet from the CBP proposed location). I routinely see wind speed, direction, and barometric pressure readings here that are very different from the local airport. I also check other on-line reporting stations in the area and see the same. This is a phenomena not generally seen in open, flat terrain, such as in Alamogordo/Holloman Air Force Base, NM. NMED needs a model that can account for these factors, and usable meteorological data from a comparable area for any modeling results to be even considered. Does NMED have such data? Can the model they require be used handle the impacts of elevation, micro-climates, etc.? If so, no one speaking on behalf of NMED or the applicant mentioned it. I (William) know something about modeling since I was called on in my profession as a systems engineer to develop and perform modeling. Having a model is useless unless it can be properly calibrated. Otherwise, it's "garbage in, garbage out". Has NMED ever collected air quality data from a CBP plant operating at a similar elevation and topology as ours and compared it to the model results, and if so, did they agree? If not, I submit your model is worse than worthless. No meaningful results are possible. We do not wish to risk our health, indeed our lives, to such a tool, nor should we be required to do so. As a result, we have no confidence that the measures that NMED will require for operating this CBP will actually be enforced. Nor do we believe NMED has a model and appropriate data to have any realistic clue what the actual air emissions will be. The only viable option we see is for NMED to reject this permit.

I-35: Elizabeth Aitken

Address: 305 Sun Valley Rd

City: Alto

State: NM

Submit Date: 02/10/2022 9:45 AM

Submit Method: Website

Comment I-35-1

I am a younger home health care clinician who relocated to live, thrive, and retire in this area. I service the population in the local area and in the immediate area surrounding the proposed site for the concrete batch plant. Our census consists of primarily elderly (65+) sick people, the majority of whom have chronic cardiopulmonary comorbidities such as asthma, allergies, COPD, pneumonia, heart failure. Some have to use supplemental oxygen to be able to breath. Some even without these conditions have to use supplemental oxygen because of the higher altitude, resulting in decreased blood oxygen saturation that one would normally have without issue at lower NM altitudes or at sea level. Having this plant here would significantly alter the air quality in a very detrimental way for everyone who lives here, imposing and inducing unwanted and ill health effects on the completely healthy, exacerbating those who have some health effects (like myself who has reactive airways), and deteriorating the health of those already sick with comorbidities like the population I treat. For example, this would have long term effects such as putting a strain on our small, critical access hospital. Yesterday when I called to find out the status of a patient, she was in the emergency room, and had been waiting there all night for a hospital bed to open up because she had fluid in her lungs. Particles in the lungs aren't any better.

I-36: John and Viv Skinner

Address: 123 Coyote Mesa Trail

City: Alto

State: NM

Submit Date: 02/04/2022 1:00 AM

Submit Method: Email

Comment I-36-1

When the prevailing wind blows in this area, it primarily blows from the southwest. Consequently, that puts our house in the direct line of the prevailing wind from the proposed Roper concrete batch plant. My wife and I have a severe dry eye condition as well as allergies. If you approve the Roper concrete batch plant we would be subject to the pollutants produced by the batch plant, which our doctors tell us would exacerbate our dry eye and allergic conditions.

Comment I-36-2

If you approve the Roper concrete batch plant we would be subject to the pollutants produced by the batch plant, which our doctors tell us would exacerbate our dry eye and allergic conditions.

I-37: Beverlee E. Nix

City: Alto

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-37-1

When the prevailing wind blows in this area, it primarily blows from the southwest. Consequently, that puts our house in the direct line of the prevailing wind from the proposed Roper concrete batch plant. My wife and I have a severe dry eye condition as well as allergies. If you approve the Roper concrete batch plant we would be subject to the pollutants produced by the batch plant, which our doctors tell us would exacerbate our dry eye and allergic conditions.

I-40: Tena Young Pitts

Address: L275 Santiago Circle

City: alto

State: NM

Submit Date: 02/05/2022 1:00 AM

Submit Method: Email

Comment I-40-2

I have a lung condition called Bronchiectasis. My quality of life is dependent upon quality fresh air to breath. That is not feasible if this concrete company is allowed to establish their business by my property.

I-46: William & Patricia Deane

Address: 108 Eagle Ridge Road

City: alto

State: NM

Submit Date: 01/15/2022 1:00 AM

Submit Method: Email

Comment I-46-2

→ The wind patterns and disbursement rates are different . → silicate particulates will travel and drop much further and in a much different pattern than what is shown down at Holloman AFB . the maximum wind speed shown in the dispersion model cannot exceed 11 m.p.h., as any wind speeds above that rate will dissipate any pollutant adequately to prevent harm to persons with sensitive health issues. Really? Yet as you are aware, the gypsum sand 50 miles away at Holloman meets our 40-60 m.p.h. wind gusts and is carried over the mountain to our locations.

I-47: 88312 Antilla

City: alto

State: NM

Submit Date: 01/16/2022 1:00 AM

Submit Method: Email

Comment I-47-1

Like many of my neighbors who suffer from respiratory issues, I have moderate to severe asthma. If the Concrete Batch Plant is approved my husband and I will be forced to move. I am sure we will not be alone.

I-51: Sharon Stewart

Address: 113 Sugar Bush

City: alto

State: NM

Submit Date: 01/19/2022 1:00 AM

Submit Method: Email

Comment I-51-1

The dust and caustic chemicals this plant will spew into the air will dramatically alter the health of the individuals who live here, most of whom are elderly and many who already have lung issues. I had a heart attack 14 years ago at the age of 50 and my breathing capabilities have been limited since that occurrence, even after rehabilitation. So, at this high altitude the presence of caustic chemicals and dust in the air will dramatically further hinder my breathing capabilities. As I understand, only a N95 mask will protect you from the aerosols created by the concrete batch plant, so even if/when Covid 19 ends, this batch plant will force us to continuing wearing masks, except now we will be (self)regulated to wear masks inside our homes as well as outdoors to protect ourselves to continue breathing.

I-54: Patricia Brown

City: alto
State: NM
Submit Date: 02/04/2022 1:00 AM
Submit Method: Email

Comment I-54-1

this area is a Class 1 wilderness area, protected from air pollution under the Clean Air Act Designated by congress. No way you can say there will be precautions taken. Just look at the equipment; the fine silica dust that will no doubt escape and blow all over the immediate area; the wasted water used to attempt to keep that dust down; and above all HUMAN ERROR. The health of every single person in Lincoln County is at stake.

I-56: Steven Hightower

Address: 137 Gray Fox Lane
City: alto
State: NM
Submit Date: 02/04/2022 1:00 AM
Submit Method: Email

Comment I-56-2

I suffer from a lung condition. The particulate matter this plant will release is known to cause cancer, and negatively affect the health of those who suffer from COPD, asthma, or any respiratory condition.

Comment I-56-5

Specifically, the bowl like depression along Little Creek where the plant is proposed to be located which is certain to trap the particulates emitted and hold them during the many days where inversion occurs in the mountainous regions of New Mexico.

I-58: Galen Farrington

State: NM
Submit Date: 02/06/2022 1:00 AM
Submit Method: Email

Comment I-58-2

There are significant health risks to children and here are significant health risks to children and adults living in proximity to concrete batch plants associated adults living in proximity to concrete batch plants associated exposure exposure to pao particulate rticulate matter and volatile chemicals found in wind matter and volatile chemicals found in wind--blown conblown concrete dust.crete dust. Exposure to airborne Exposure to airborne concrete dust causes irritation of the eyes, skin, throat, and upper respiratory tract, concrete dust causes irritation of the eyes, skin, throat, and upper respiratory tract, especially in sensitive individuals. especially in sensitive individuals. Up to 30% of cemenUp to 30% of cement dust ist dust is ccompoomposed of crystalline sed of crystalline silica,silica, a known a known

carcinogenic. . People with prolonged exposure to cement dust have a longer exposure to cement dust have a higher incidence of lung cancer compared to the general population. People with prolonged exposure to cement dust have a longer exposure to cement dust have a higher incidence of lung cancer compared to the general population.

I-61: Sarah Ball

State: NM

Submit Date: 02/07/2022 1:00 AM

Submit Method: Email

Comment I-61-1

My husband and I are retired as are many of our neighbors. My husband has asthmatic issues and uses an inhaler regularly. I have RA and am on daily medication. Ailments related to aging in this entire area are not uncommon. The proposed plant has the high potential to damage the health of surrounding residents. The particulate matter has been linked to serious health conditions including reduced lung development in children, higher rates of asthma, bronchitis, heart disease, and cancer. With the high winds that often plague New Mexico it would be very difficult to control the particulate matter, scattering it throughout the area, damaging not only human life, but plant and animal life as well.

I-66: Stanley Mathis

Address: 399 State Highway 220

City: alto

State: NM

Submit Date: 02/07/2022 1:00 AM

Submit Method: Email

Comment I-66-2

he would use water to suppress the dust. Now we have a source of pollution to our ground water since the run off will be full of these same chemicals. Again the plant is wasting more of our scarce water resources and adding pollution to the ground water from the run off. This water would be in addition to the 76,000 gallons per day that his permit request states it will take to operate the facility. According to the EPA, the average person here in the US uses 82 gallons a day.

Comment I-66-3

This batch plant will add enormous amounts of dust particles and pollutants to our air. The carcinogenic crystalline silica can cause lung damage, COPD, kidney disease as well as cancer. Add the diesel fumes from the trucks moving the concrete 18 hours a day and you add sulfur dioxide, carbon monoxide and nitrogen oxide to the pollution. I understand that Roper used air quality data from Holloman AFB area in his application. Well, the environment around the AFB certainly is almost identical to the proposed site. A flat area devoid of vegetation and animal life could be the twin of a mountainous area with tall trees, abundant wild life and cool temperatures. It would seem that the NMED could have easily asked for data from his current plant in Carrizozo. There they would have seen an arid landscape devoid of plant and animal life due to the dust and pollutant accumulation over the years.

I-76: Dixie Brown

Address: 115 Pinos Altos

City: alto

State: NM

Submit Date: 02/08/2022 1:00 AM

Submit Method: Email

Comment I-76-2

I suffer from severe asthma and I fear the dust from the plant will cause more medical issues for me as well as others.

I-77: Lynne Burnett

Address: 340 Santiago Circl

City: alto

State: NM

Submit Date: 02/08/2022 1:00 AM

Submit Method: Email

Comment I-77-4

NMED's response to the admitted air pollution by crystalline silica (a known carcinogen that can cause irreparable lung damage) as well as sulfur oxide and nitrogen oxide is to mitigate this pollution through water sprayers. Transferring water rights doesn't produce water. If he is permitted to drill wells, the private wells that residents and livestock living downstream rely upon could be impacted. Roper then said he will truck in the water. Again, more air pollution caused by potentially hundreds of diesel trucks, creating carbon dioxide. Heavy metals such as arsenic, cadmium, copper, lead, selenium, antimony and chromium can leach into drinking water from cement plants.

I-78: Sue Catterton

Address: 173 Sonterra Drive

City: alto

State: NM

Submit Date: 02/08/2022 1:00 AM

Submit Method: Website

Comment I-78-2

And the strong winds we receive will bring suffocating air pollutants throughout the area. Air Pollution: Each ton of cement produced will result in total particulate emission of 360 pounds. Many of us have retired to this area and thus are older with breathing and other medical issues which will force some to move away. Degraded air quality and great increase in dust, will also be detrimental to the horses and other livestock.

I-81: Galen Farrington

City: alto

State: NM

Submit Date: 02/08/2022 1:00 AM

Submit Method: Email

Comment I-81-2

Then made an argument for denying the permit due to outdated meteorological data gathered at Holloman AFB because of "... similar elevation, topography, terrain, vegetation, and climate at both sites. "There is an elevation difference of almost 3,500 feet, a terrain and topographic change from high desert to mountainous, two vegetative life zone differences, and eight climate zone differences." How can data derived from such dissimilar sites 45 miles apart be comparable? ††††††††††

I-87:

State: NM

Submit Date: 02/08/2022 1:00 AM

Submit Method: Email

Comment I-87-2

Another concern is the amount of water used in the production and to wash the equipment. It would go into the ground water and any wash or stream nearby, killing all that lives there. The dust and chemicals would wash over the land, into the water system and into homes for people to drink.

I-91: Craig Cathey

State: NM

Submit Date: 02/08/2022 1:00 AM

Submit Method: Email

Comment I-91-2

We are both chronic allergy sufferers, with compromised immune systems, and we have a great many concerns about the impact this CBP would have on our health and well-being, both physically and mentally. I can't imagine that wet suppression techniques will eliminate all of the Fugitive Respirable Crystalline Silica Dust that the CBP would generate.

I-97: Deborah Dean

City: alto

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-97-4

the effects of dust particulates that escape into the air, especially crystalline silica, that have caused respiratory health problems in populations living near other existing concrete plants.

I-98: Charles Dixon

Address: PO BOX 416

City: alto

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-98-2

The pollutants will certainly lead to poorer quality of life and shorter lives. Plus, allow the pollutants from the plant to be scattered across the area and onto the people live here, many of us who suffer from breathing or other ailments. I was recently fortunate enough to have a healthy kidney transplanted into my body. I do all possible to avoid pollutants in order to protect this precious kidney that saved my life. The pollutants would certainly lead to decline in my kidney function, dialysis with a very poor quality of life, possibly another transplant if I survive long enough or death.

I-102: Lisa French

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-102-2

Water is limited. How can the EPA justify allowing a third concrete plant when two already exist in proximity to this potential development? An enormous amount of fossil fuel will be utilized to fetch water to contain the silica dust. High winds frequent the area.

I-103: John and Tracy Hogan

City: alto

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-103-2

air quality is a big concern for us. Someone that is only two years out from cancer treatment is especially susceptible to any foreign particles in the air or water.

I-104: Hank Jones

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-104-1

Cement Batch Plants Require SWPPP: I would now like to discuss the issue of Stormwater Pollution and Prevention Plans (SWPPP). The proposed CBP is within a mile of a waterway of the United States and thus must retain and/or monitor, thru sampling events, discharge of runoff of rain water from the property. The CBP must also exhibit the ability to contain any discharge of contaminants from the CBP property. Cement contains the RCRA heavy metals and are toxic to humans, wildlife and vegetation. The pollution of the soil is cumulative and thus overtime will destroy vegetation and is chronic for humans causing illness overtime. Non-Stormwater Discharges: The air permit application for the proposed operator of the CBP stated that dust from the operations would be cleaned using wash water to clean pavements. These non-stormwater discharges are prohibited. This guidance comes from the National Pollutant Discharge Elimination System (NPDES) under the Industrial Stormwater Guidance. To conclude, CBP proposed operator has not addressed many of the concerns that the EPA has much interest in; especially being in a very environmental sensitive area.

I-105: K'Aun Kingsley

Address: 122 Legacy Lane

City: alto

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-105-3

I personally have sleep apnea and have to rely on a Cpap machine with an oxygen feed to sleep at night and often time during the day time. With such a tenuous breathing situation, it is totally worrisome to me and my husband to have a business build directly across the street from us that has the possibility of emitting anything less than pristine air to breath.

I-107: Sheri Lacy

Address: 143 Legacy Lane

City: alto

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-107-2

This plant will be releasing tons of harmful particulates into the air. These harmful pollutants can penetrate deep in the lungs. Studies by the Occupational Safety and Health Administration have shown that people who inhale this dust or particulates are at an increased risk of developing diseases like lung cancer, COPD, kidney diseases, and silicosis. My husband and I will not be able to escape the harmful

exposure for 24 hours a day, every day. The dust will be visible as it settles on everything outside, but some of the harmful particulates will not be visible. If I try to sweep the porch or dust inside my house, I will be stirring up the harmful particulates and inhaling them. I will have no protection from inhaling the harmful particles each day hour after hour. There will be no barrier to protect my home or my body from being infiltrated with this harmful air. After reading studies researching what is the safest distance for living close to a concrete batch plant, I saw that most of the studies recommended living no closer than 1500 Meters. My house is 102 Meters from the location chosen to build the plant. I will also be exposed to the black carbon and nitrogen dioxide produced by numerous trucks idling while waiting to be unloaded or waiting to be loaded. Who will monitor the plant's harmful emissions to make sure they are staying within acceptable ranges when and if the plant gets up and running? How will the NMED make sure that close neighbors are protected from these harmful particulates?

I-108: Lou and Amy Goode

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Email

Comment I-108-2

Concrete Batch Plant operations, equipment and trucks emit Volatile Organic Compounds (VOC's), Hazardous Air Pollutants (HAP's), Particulate Matter (10 and 2.5 microns) and non EPA/NMED controlled Respirable Crystalline Silica (RCS) or Silica Dust, that once inhaled can cause lung cancer, kidney disease, silicosis and incurable lung disease.

I-118: Suzanne Santo

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-118-2

silica dust. The dust settles over the community and adversely impacts those neighborhoods and residents who are suffering with current breathing problems or will cause breathing problems and/or possibly cancer in the future.

Comment I-118-3

Silica dust will harm not only the grass, plants, and the trees in that area but will also severely impact the health of our local New Mexico wildlife that will ingest the silica dust as they're grazing. Our subdivision and many surrounding subdivisions will be negatively impacted by the amount of water required to produce concrete and maintain adequate dust control methods that is normally mandated for an industrial facility. a surface irrigation system spraying raw materials and the plant road for dust control. Groundwater contamination will become a serious concern to our community.

Comment I-118-5

The clean mountain air to retire in. The fact that the site cannot meet the minimum distance to the designated federal wilderness area should have resulted in a rejection of the application for that site. My

husband was a quality control manager for the largest concrete plant in El Paso and witnessed the impact of surrounding neighborhoods that lived with silica dust. The dust settles over the community and adversely impacts those neighborhoods and residents who are suffering with current breathing problems or will cause breathing problems and/or possibly cancer in the future. From my home, I will see the emission clouds in the air. I will breathe the silica emissions that will be deposited on my home and my land, and I will hear the constant noise of a CBP running 12 to 18 hours a day. will require high-intensity lighting for safety issues resulting in light trespass and will negatively impact the community's appeal as a dark sky community.

I-119: Tom Stewart

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-119-2

The nuisance resolution 2021-24

I-122: Bill Horton

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-122-1

my wife had been diagnosed with reactive airway disease prior to our moving here. Within two years of moving here, we've moved here for the pristine the clean air, less traffic, noise, et cetera, within two 2 years, her reactive airway disease seemed to disappear, and she no longer requires an inhaler. With this concrete batch plant being 660 feet away from our home, it's inevitable that those symptoms will return and get worse. We are both in our mid to late 70s. We are in that age group where we are much more susceptible to the dangers of pollutants in the air. We are not unique. Our community has a very high concentration of retirees. I heard nothing about monitoring, about observation, which is going to be critical to make sure that the plant stays within its limits. We have tried to find out the history of the plant in Carrizozo. I have been able -- unable to find any evidence, and others have been unable to find any evidence of -- of inspection ever of that plant. So who is going to be looking out for us?

I-124: Galen Farrington

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-124-3

For cancer survivors, appropriate filtration systems are a necessary financial investment. Our home has a five-stage drinking water system and a three-stage rest of house filtration system. This system is not designed to deal with the crystalline silica of airborne cement dust, which will infiltrate water sources.

Comment I-124-5

Denying the permit due to outdated meteorological data gathered at Holloman Air Force Base. My objection to the applicant's modeling was, quote, there is an elevation difference of almost 3500 feet, a terrain and topographic change from high desert to mountainous, two vegetative life zone differences, and 80 climate zone differences, unquote. affected by any added pollutants in the air .-†

Comment I-124-6

On June 3rd, four senior retired property owners in Legacy Estates, realizing the consequential negative health issues resulting from Mr. Roper's proposed project, faxed letters of opposition to NMED AQB. Not only had he ignored the well-being of an established residential community, he filed his permit request on June 22nd, indicating that there was no opposition to his proposed plant site.

I-127: Craig Cathey

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-127-4

And the site where it's proposed to go is surrounded on all sides by established residential neighborhoods. my property is less than one hundred yards across the highway from the perimeter where Roper wants to build his concrete batch plant.

I-129: Jeff Bleau

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-129-4

I'd like to emphasize that the proposed site is not a big site, so to get to the fence line doesn't take very long, and all the discussion about -- about wind speed and MET data, it just is a function of how long -- how long and how fast can a release get to the point that it becomes fallout, so that's -- you know, it's going -- we've got a lot of anecdotal data that shows that there's dust accumulation outside of concrete plants. So you can talk all you want about concentrations; the fact is that dust does accumulate in and around concrete batch plants.

I-131: Josh Botkin

State: NM

Submit Date: 02/08/2022 1:00 AM

Submit Method: Oral

Comment I-131-4

My nursery stands to lose quite a bit. The dust that falls on my trees outside have been shown through various studies that it will cause degradation n plant health, bee health, and all abiotic responses by the roots.

I-133: Frank Cannella

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-133-4

Proposing to establish this concrete plant in a residential neighborhood. there's eleven subdivisions within just a mile or so of that concrete plant.

I-135: Barbara Yount

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-135-1

Numbers on an application do not adequately describe the health damage that will prove to the residents of the more than 140 properties within a one-half 8 mile radius of this site. This proposed CBP with its toxic air, extreme water usage, loud industrial noise, proposed long operating hours, and heavy truck traffic would reach far beyond its borders, harming the health and welfare of residents, disturbing habitats of native New Mexico wildlife, birds, and plants, depleting natural resources, and contaminating the scarce right to subsidize its profits with our physical and mental health. a 78-year-old little old lady with health issues, including allergies and a compromised immune system, I implore you to deny this permit.

Comment I-135-2

This invisible silica dust, when inhaled, bypasses our body's defenses and goes straight to our lungs, creating scars in the delicate lung fibers that can never be repaired and may eventually lead to terminal silicosis. It also exacerbates asthma, heart and lung disease, and this starkly limits our outdoor activities, thus damaging not only our physical health but our mental health as well.

Comment I-135-5

I'm Dr. Barbara Yount. My property is less than 100 yards from the proposed plant.

I-137: Sue Catterton

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-137-2

I wish you had been here in December when winds were recorded at our airport at 83 miles per hour.

I-138: Steven Hightower

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-138-3

You guys talk about temperature, humidity, wind speed, and direction, but nowhere do I see any kind of reference to temperature inversions. now, temperature inversions happen on my property every single day in the wintertime. This morning I recorded a minus 4-degree Fahrenheit temperature in the valley. 2 Along Little Creek, on top of a hill on my property, it was 32 degrees. That's a strong inversion that takes place every single day. The particular site is a bowl where this thing is proposed to be built. I promise you there's an inversion layer that takes place there every single day, and nothing affects air quality in New Mexico as much as a temperature inversion does, and it's not even been considered from what I have been able to read. You guys know what this does to the air in Albuquerque? You have nights on end where you can't even burn your fireplace because there's an inversion layer. So I don't think your data from Holloman matters one bit. I don't think your data from Sierra Blanca airport would matter one bit. Sierra Blanca airport sits on top of a mesa. The valleys that surround that airport invert nightly. I've seen fog form in those valleys where the airport's sitting up in the clear air. The same thing is going to happen in that bowl where you propose to build that site, and I'd like to know why an inversion is not included in your study. It affects air quality. You know what happens when there's an inversion, it traps particulate matter. It stays for hours or days as long as that inversion is in place. The air quality will become so poor in that bowl where that site is, nobody's going to want to drive by there. You're going to want to hold your breath, okay. So I think nothing short of a study at the site would address the air quality that's actually going to get produced there.

I-139: Nancy Fegely

State: NM

Submit Date: 02/09/2022 1:00 AM

Submit Method: Oral

Comment I-139-2

our huge concern is the issue of pollutants and fugitive dust this type of operation creates and the carcinogen crystalline silica. Dust and pollutants will not stay contained to the site or nearby. You've heard about reports of New Mexico wind and the winds generated just in this past January. I live about three miles downwind from the site, and in my area, I had sustained winds of over miles per hour and gusts between and 75 miles per hour. We can be affected by dust storms created by White Sands, that's 40 miles away, and that brings chips in here. And I believe gypsum is heavier than crystalline silica. Holloman has nothing to do with what we have here 11 with mountains and the canyons that we have here, with the 12 downslope winds, et cetera.