

B. Noble  
250 Diana Drive  
Alamo, TX 78516

20 NOV 2024  
MCALLEN TX  
20 NOV 2024



RECEIVED

NOV 22 2024

TCEQ MAIL CENTER

BC

RECEIVED

NOV 22 2024

OFFICE OF LEGAL SERVICES

Miss Gwen Ricco  
MC 205 Office of Legal Services  
Texas Commission of Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

787113087



November 20, 2024

Ms. Gwen Ricco  
MC 205 Office of Legal Services  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Dear Ms. Ricco:

Reference: Non-Rule Project No.2024-018-OTH-NR

I am writing to express my concerns regarding the Proposed Air Quality Standard Permit for the referenced Temporary Concrete Batch Plant permit for Public Work Projects. While I understand the need for public work projects being done in a timely manner, they must not be done at the expense of public health and safety.

The proposed batch plant is bordered by two schools and two residential neighborhoods, one of which is a 55+ retirement community of which I am a resident. I am concerned that vulnerable children and senior citizens will be exposed to high concentrations of silica, carbon monoxide, sulfur oxide, and nitrogen oxides that may be put in the air by a temporary concrete batch plant. These emissions will cause breathing problems and as well as respiratory and cardiovascular diseases.

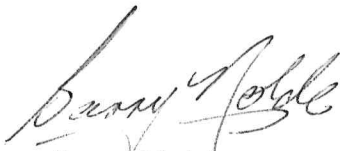
To ensure that public health interests are taken into consideration by the company and/or operator, it is essential that the application be subjected to the same review process as required for a permanent operating permit. Further, because a temporary permit can authorize the concrete batch plant to operate for 180 days or the duration of the public work project, and this plant's project can last more than a year, it should be considered ineligible for a temporary permit and require full public review and compliance with all operating requirements of permanent concrete batch plants.

If approved to operate, this concrete batch plant should be required to have 12 feet high dust suppressing fencing or barriers and cohesive hard surfaces to reduce dust and emissions to allow cleaning the hard surfaces.

The operating permit should limit the amount of materials the concrete batch plant is authorized to stockpile and define the plant's operating hours such as 8 a.m. to 5 p.m. Monday through Saturday. This would limit the plant's impact on nearby residential areas, schools, and heavily congested commuter roads.

In reviewing the Proposed Air Quality Standard Permit for Temporary Public Works Projects, I find it alarming that restrictions required for a permanent concrete batch plant were lessened or removed for a temporary concrete batch plant. Almost all related studies have found cement plant exposure to increase respiratory disease and cancer risks in both children and adults. Unless significant changes identified above are made, I fear adverse health effects will result.

Sincerely,



Barry Nolde  
250 Diana Drive  
Alamo, Texas  
78516

RECEIVED

NOV 22 2024

OFFICE OF LEGAL SERVICES