

Linda Campbell

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 Temporary Concrete Batch Plants for Public Work Projects. While I understand the need for public work projects being done in a timely manner, I am very concerned that they not be done at the expense of my health. As a senior I am concerned about the high concentrations of silica, carbon monoxide, sulfur oxide, and nitrogen oxides that could be put in the air by a temporary concrete batch plant. These emissions may cause breathing problems and as well as respiratory and cardiovascular diseases.

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 studies have found a positive association between cement plant exposure and respiratory disease symptoms as well as an excess risk of cancer incidences in both children and adults. Unless significant changes as identified below are not made, I fear as a senior that I would develop significant respiratory conditions if a temporary concrete batch plant would locate near me.

I am very concerned that the proposed standard takes away the public notice and right to comment before a specific temporary permit can be issued. Therefore, in reviewing the proposed standard I highly recommend that several areas need to be changed to ensure that the public health interests are taken into consideration by the company and/or operator.

Per the proposed standard, a temporary concrete batch plant is for 180 consecutive days or that supplies concrete for a single public work project. Public work projects can go on for a year or more. If a project is going to last more than a year, it should be considered ineligible for a temporary concrete batch plant permit and require public comments.

Companies and operators should be required to have dust suppressing requirements. Permanent concrete batch plants are required to have dust suppressing fencing or barriers of 12 feet high. Why would temporary batch plants be allowed to not meet this requirement? You are proposing to place one of the most toxic plants in the industry in communities with no dust suppressing requirements. This is unacceptable. A requirement needs to be added.

Permanent concrete batch plants are required to have cohesive hard surfaces to reduce dust and emissions. It also allows for cleaning the hard surfaces. Why aren't temporary plants being required to have cohesive hard surfaces to protect the health of the community? A requirement needs to be added.

There is no limit on a stockpile for temporary concrete batch plant but there is a limit for permanent concrete batch plants. Limit requirements should be established.

I oppose that a facility can operate for 12 hours during any 24-hour period. Since these plants can be located near residential areas, schools, etc., they should be limited to fewer, set hours, such as 8 a.m. to 5 p.m. and set days of the week such as Monday through Saturday. This would ensure that plants located near residential areas, schools, and heavily congested commuter roads provide for safe transportation for school buses and commuters.

I oppose the change to setback distance from property line to off-site receptor (residence, school, day-care, hospital, business or place of worship). This change would allow the company to have equipment right up to their property line and provide no buffer for their neighbor's property. The setback distance should be changed back to property line.

On a more personal note, I am a senior who currently resides in Texas. Presently I am very active and healthy but have grave concerns that this type of plant would have adverse affects both on my health and the health of the community that I live in. This type of plant would subject me to air born toxins (volatile organic compounds) such as sulfur dioxide, nitrogen oxide and carbon monoxide, which are associated with the following health and environmental impacts (National Institute of Health):

- Nitrogen oxide (NO<sub>x</sub>) can cause or contribute to a variety of health problems and adverse environmental impacts, such as ground-level ozone, acid rain, global warming, water quality deterioration, and visual impairment. Affected populations include children, people with lung diseases such as asthma, and exposure to these conditions can cause damage to lung tissue for people who work or exercise outside.
- Sulfur dioxide (SO<sub>2</sub>) in high concentrations can affect breathing and may aggravate existing respiratory and cardiovascular disease. Sensitive populations include asthmatics, individuals with bronchitis or emphysema, children, and the elderly. SO<sub>2</sub> is also a primary contributor to acid deposition, or acid rain.
- Carbon monoxide (CO) can cause harmful health effects by reducing oxygen delivery to the body's organs and tissues, as well as adverse effects on the cardiovascular and central nervous systems. CO also contributes to the formation of smog (ground-level ozone), which can cause respiratory problems.

The following from <https://www.sciencedirect.com/science/article/abs/pii/S0045653518321957> indicates that cement plant exposure was associated with:

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- Higher risk of respiratory symptoms and lung function decline
- An excess risk of cancer incidence and mortality, mainly respiratory tract cancers was found in both children and adults.
- Exposed compared to unexposed subjects had higher blood or urinary concentration of heavy metals and of a marker of renal damage.

As well, continuous vehicle movement of trucks will add to noise pollution in any area that a cement plant (even temporary) resides. This movement of trucks would also impact the infrastructure of the roadways.

In addition, property values would lower and it would be more difficult to sell a home in areas near cement plants. At this point in my life, it would be very difficult and expensive for me to move from my retirement community and friends.

Respectfully,  
Linda Campbell