

Geary Hughes

Dear TCEQ Commissioners,

The current Best Management Practices for aggregate production operations require significant strengthening to protect Texas communities and natural resources:

1. Mandate continuous air quality monitoring at property boundaries with specific PM2.5 and PM10 limits. Require documented dust control plans with measurable targets and clear violation thresholds.
2. Establish minimum 1,500-foot setbacks from residences, schools, and sensitive areas. Require vegetative buffers of specified width and density, plus noise barriers near residential zones.
3. Require baseline groundwater studies before operations begin, with quarterly testing thereafter. Mandate specific liner requirements for all water containment structures and establish clear contamination response protocols.
4. Implement stricter operational controls: limited hours near residential areas, covered conveyor systems regardless of length, mandatory wheel washing stations, and enforced speed limits on haul roads.
5. Institute regular third-party compliance audits, clear penalty structures, public reporting of monitoring data, and mandatory community notification systems.

These improvements would create accountable, measurable standards while balancing industrial needs with public health and environmental protection.

Sincerely,
Geary Hughes