

# Harris County Pollution Control

Established in 1953

## Harris County Pollution Control Services

Dr. Latrice Babin, Executive Director



September 18, 2023

Laurie Gharis, Chief Clerk  
Texas Commission on Environmental Quality  
Office of the Chief Clerk, MC 105  
P.O. Box 13087  
Austin, TX 78711-3087

RE: Southern Crushed Concrete., Air Quality Permit Number 55353

Dear Ms. Gharis,

On July 17, 2023, Southern Crushed Concrete, (SCC), applied for a renewal Air Quality Standard Permit, Registration No. 55353, which would authorize continued operation of a rock crushing facility located at 3600 Schalker Drive, Houston, Harris County, Texas 77026. PCS submits the following comments in response to the opportunity for public comment.

PCS inspects facilities in Harris County for compliance with air quality laws and regulations, reviews permit applications, and comments to the TCEQ on permitting actions. PCS also works closely with the TCEQ's Houston regional office which, as a matter of course, refers a substantial portion of environmental complaints, including nuisance complaints, from Harris County citizens to PCS. PCS then investigates these complaints and, when appropriate, issues Violation Notices and refers cases to the Harris County Attorney's Office or District Attorney's Office for civil or criminal enforcement.

PCS is concerned that SCC's operations at the proposed site have the potential to cause nuisance dust conditions near the facility. Furthermore, PCS is concerned about the potential PM<sub>2.5</sub> non-attainment status and the operations of the site being a major contributor of PM emissions. Based on the area map, the facility is located directly east of a densely populated residential neighborhood.

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- To minimize the potential impact of particulate matter (PM) emissions from this facility, PCS recommends that the facility adopt the following control measures based on those found in the Air Quality Standard Permit for Concrete Batch Plants with Enhanced Controls.
- (3)(B)(i) – Ensure that the fabric/cartridge filter systems and suction shroud are operated properly with no tears or leaks
- (3)(E) – Pave each road, parking lot, or other areas at the plant site that are used by vehicles with a cohesive hard surface and properly maintain, clean, and water so as to minimize dust emissions
- (3)(K)(ii) – Keep stationary equipment, stockpiles, and vehicles used at the plant, except for incidental traffic and vehicles as they enter and exit the site, located or operated more than 100 feet from any property line
- (3)(L)(i) – Install a 12-foot high, dust suppressing barrier as a border around roads, traffic areas, and work areas
- (3)(L)(ii) – Place three-walled bunkers around all stockpiles that are at least two feet above the top of the stockpile

PCS also recommends that the facility adopt the following control measures and work practices:

- Cover stockpiles when not in use so as to minimize dust emissions
- Maintain a vegetative barrier (trees and other foliage) around as much of the perimeter of the facility as possible
- Install a wheel wash and rumble strips at the exit of the facility to prevent tracking concrete onto the roadway
- Operate only during daylight hours

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Thank you for the opportunity to provide these concerns regarding the permitting action referenced above. Should you have any questions please contact Mr. Cameron Dews at (713) 274-6345 or via email at [cameron.dews@pcs.hctx.net](mailto:cameron.dews@pcs.hctx.net).

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Babin'.

Dr. Latrice Babin  
Executive Director

cc: Helen Bonnyman - Harris County Judge's Office  
Sarah Utley - Harris County Attorney's Office  
Sonya Marrett - Harris County Precinct  
Nicole Bealle - TCEQ Region 12

CD/vb