


# Texas Commission on Environmental Quality

## INTEROFFICE MEMORANDUM

**To:** Air Permits Division Staff  
Field Operations Staff  
Interested Applicants

**Date:** September 26, 2014

**From:** Michael Wilson, P.E., Director, Air Permits Division 

**Subject:** Standard Permit Renewal Recommendation – Concrete Batch Plants with Enhanced Controls

**Concrete Batch Plants with Enhanced Controls Renewal:** In accordance with 30 Texas Administrative Code (TAC) § 116.604(4) we are authorized to renew specific standard permits automatically and provide written notice to registrants of this standard permit. Therefore, at the end of the 10-year permit term, for Concrete Batch Plants with Enhanced Controls Standard Permit, we will provide written notification to the permit holders that their permits are renewed.

Additionally, the TCEQ Environmental Law Division has concluded that the standard permit is renewed with the understanding that the 440-yard buffer requirement between the central baghouse exhaust and the nearest permanent residence, school, or place of worship is determined during the initial application and not during renewal, in accordance with Texas Health and Safety Code (THSC) § 382.05198(a)(19).

The statutory requirements for this standard permit are located in THSC § 382.05198 and § 382.05199 (see attached). Legislative action is required to amend these sections, and we are not aware of any ongoing amendment intentions or efforts.

**Other Standard Permits Renewal:** In contrast, the Air Permits Division renews the following types of standard permit projects in accordance with 30 TAC § 116.604(2) and (3):

- Pollution Control Projects;
- Oil and Gas Facilities;
- Concrete Batch Plants;
- Electric Generating Units; and
- Hot Mix Asphalt Plants.

These standard permits have been amended by the Commission, so registrants must demonstrate that they meet the requirements of the amended standard permit and applicable state and federal regulations in accordance with 30 TAC § 116.605(d)(1).