

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

February 21, 2012

TO: Persons on the attached mailing list.

RE: Fred Weber, Inc.
Permit No. 94520L001

Decision of the Executive Director.

The executive director has made a decision that the above-referenced permit application meets the requirements of applicable law. **This decision does not authorize construction or operation of any proposed facilities.** This decision will be considered by the commissioners at a regularly scheduled public meeting before any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting.

Enclosed with this letter is a copy of the Executive Director's Response to Comments. A copy of the complete application, draft permit and related documents, including public comments, is available for review at the TCEQ Central office. A copy of the complete application, the draft permit, and executive director's preliminary decision are available for viewing and copying at the TCEQ Central Office, the TCEQ Dallas/Fort Worth Regional Office, and at the City of Richland Civic Center, 103 West Main Street, Richland, Navarro County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

If you disagree with the executive director's decision, and you believe you are an "affected person" as defined below, you may request a contested case hearing. In addition, anyone may request reconsideration of the executive director's decision. A brief description of the procedures for these two requests follows.

How To Request a Contested Case Hearing.

It is important that your request include all the information that supports your right to a contested case hearing. You must demonstrate that you meet the applicable legal requirements to have your hearing request granted. The commission's consideration of your request will be based on the information you provide.

The request must include the following:

- (1) Your name, address, daytime telephone number, and, if possible, a fax number.
- (2) If the request is made by a group or association, the request must identify:

- (A) one person by name, address, daytime telephone number, and, if possible, the fax number, of the person who will be responsible for receiving all communications and documents for the group; and
 - (B) one or more members of the group that would otherwise have standing to request a hearing in their own right. The interests the group seeks to protect must relate to the organization's purpose. Neither the claim asserted nor the relief requested must require the participation of the individual members in the case.
- (3) The name of the applicant, the permit number and other numbers listed above so that your request may be processed properly.
 - (4) A statement clearly expressing that you are requesting a contested case hearing. For example, the following statement would be sufficient: "I request a contested case hearing."

Your request must demonstrate that you are an **"affected person."** An affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. Your request must describe how and why you would be adversely affected by the proposed facility or activity in a manner not common to the general public. For example, to the extent your request is based on these concerns, you should describe the likely impact on your health, safety, or uses of your property which may be adversely affected by the proposed facility or activities. To demonstrate that you have a personal justiciable interest, you must state, as specifically as you are able, your location and the distance between your location and the proposed facility or activities. A person who may be affected by emissions of air contaminants from the facility is entitled to request a contested case hearing.

Your request must raise disputed issues of fact that are relevant and material to the commission's decision on this application. The request must be based on issues that were raised during the comment period. The request cannot be based solely on issues raised in comments that have been withdrawn. The enclosed Response to Comments will allow you to determine the issues that were raised during the comment period and whether all comments raising an issue have been withdrawn. The public comments filed for this application are available for review and copying at the Chief Clerk's office at the address below.

To facilitate the commission's determination of the number and scope of issues to be referred to hearing, you should: 1) specify any of the executive director's responses to comments that you dispute; and 2) the factual basis of the dispute. In addition, you should list, to the extent possible, any disputed issues of law or policy.

How To Request Reconsideration of the Executive Director's Decision.

Unlike a request for a contested case hearing, anyone may request reconsideration of the executive director's decision. A request for reconsideration should contain your name, address, daytime phone number, and, if possible, your fax number. The request must state that you are requesting reconsideration of the executive director's decision, and must explain why you believe the decision should be reconsidered.

Deadline for Submitting Requests.

A request for a contested case hearing or reconsideration of the executive director's decision must be **received by** the Chief Clerk's office no later than **30 calendar days** after the date of this letter. You may submit your request electronically at <http://www.tceq.texas.gov/about/comments.html> or by mail to the following address:

Bridget C. Bohac, Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

Processing of Requests.

Timely requests for a contested case hearing or for reconsideration of the executive director's decision will be referred to the alternative dispute resolution director and set on the agenda of one of the commission's regularly scheduled meetings. Additional instructions explaining these procedures will be sent to the attached mailing list when this meeting has been scheduled.

How to Obtain Additional Information.

If you have any questions or need additional information about the procedures described in this letter, please call the Public Participation and Education Program, toll free, at 1-800-687-4040.

Sincerely,



Bridget C. Bohac
Chief Clerk

BCB/ms

Enclosure

MAILING LIST
for
Fred Weber, Inc.
Permit No. 94520L001

FOR THE APPLICANT:

Lina J. Klein, Environmental Manager
Fred Weber, Inc.
2320 Creve Coeur Mill Road
Maryland Heights, Missouri 63043

INTERESTED PERSONS:

See attached list.

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

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Small Business and Environmental
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Public Education Program MC-108
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Ross Henderson, Staff Attorney
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Larry Buller, P.E., Technical Staff
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FOR PUBLIC INTEREST COUNSEL
via electronic mail:

Blas J. Coy, Jr., Attorney
Texas Commission on Environmental
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Public Interest Counsel MC-103
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Austin, Texas 78711-3087

FOR THE CHIEF CLERK
via electronic mail:

Bridget C. Bohac, Chief Clerk
Texas Commission on Environmental
Quality
Office of Chief Clerk MC-105
P.O. Box 13087
Austin, Texas 78711-3087

GALLEGOS , CYNTHIA
6860 SW COUNTY ROAD 0030
CORSICANA TX 75110-9320

MENDOZA , RAMON
408 SW COUNTY ROAD 0020
CORSICANA TX 75110-9311

ODELL , PATRICIA
412 SW COUNTY ROAD 0020
CORSICANA TX 75110-9311

PATTERSON , MARGARITA
429 SW COUNTY ROAD 0020
CORSICANA TX 75110-9315

PEVEHOUSE , EDDIE L
9580 SW COUNTY ROAD 2300
WORTHAM TX 76693-4510

PROCTER-SMITH , GEORGE & MARJORIE
6857 SW COUNTY ROAD 0030
CORSICANA TX 75110-9322

RAWLINS , DIANA
PEOPLE UNTIED FOR THE ENVIRON
1541 W 4TH AVE
CORSICANA TX 75110-4261

REFFITT , MARGARET
6831 SW COUNTY ROAD 0021
CORSICANA TX 75110-9318

ROBLES , CONSUELO R
6860 SW COUNTY ROAD 0030
CORSICANA TX 75110-9320

SALAS , ELVIA
PO BOX 665
CORSICANA TX 75151-0665

SALAS , MARIANELLA
PO BOX 665
CORSICANA TX 75151-0665

SALAS , NICANOR A
PO BOX 665
CORSICANA TX 75151-0665

VAUGHAN , DON & DORIS
412 SW COUNTY ROAD 0020
CORSICANA TX 75110-9311

WILLIFORD , BETTIE & WILLIAM
6560 SW COUNTY ROAD 0030
CORSICANA TX 75110-0255

TCEQ AIR QUALITY PERMIT NUMBER 94520L001

APPLICATION BY § **BEFORE THE**
§
FRED WEBER, INC. § **TEXAS COMMISSION ON**
ROCK CRUSHING PLANT § **ENVIRONMENTAL QUALITY**
RICHLAND, NAVARRO COUNTY §

CHIEF CLERK OFFICE

2012 FEB 15 PM 4: 22

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from the following persons: Cynthia Gallegos, Ramon Mendoza, Patricia ODell, Margarita Patterson, Eddie Pevehouse, Diana Rawlins, Margaret Reffitt, Consuelo R. Robles, Elvia Salas, Marianella Salas, Nicanor A. Salas, George L. Proctor-Smith, Marjorie Proctor-Smith, Don Vaughan, Doris Vaughan, Bettie Williford, and William Williford. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Office of Public Assistance at 1-800-687-4040. General information about the TCEQ can be found at our website at www.tceq.state.tx.us.

BACKGROUND

Description of Facility

Fred Weber, Inc. has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. This will authorize the construction of a new facility that may emit air contaminants.

This permit will authorize the applicant to construct a portable rock crushing facility consisting of three crushers, three screens and associated conveyors, loading operations and aggregate stockpiles with a permitted hourly throughput of 500 tons of material per hour and an annual throughput of 1,920,000 tons of material per year. The facilities will be permitted to operate 16 hours per day, 5 days per week and 48 weeks per year for a total operating schedule not to exceed 3,840 hours per year. The facility will be located at 7329 SW County Road 30, Richland, Navarro County. Contaminants authorized under this permit include particulate matter (PM) including particulate matter with diameters of 10 microns (PM₁₀) or less and 2.5 microns or less (PM_{2.5}).

Procedural Background

Before work is begun on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain a permit from the commission. This permit application is for an initial issuance of Air Quality Permit Number 94520L001.

The permit application was received on January 4, 2011, and declared administratively complete on January 14, 2011. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published on February 9, 2011, in the *Corsicana Daily Sun* and on February 24, 2011 in *La Prensa Comunidad*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) for this permit application was published on November 13, 2011 in the *Corsicana Daily Sun* and on November 15, 2011 in *La Prensa Comunidad*. The public comment period ended on December 15, 2011.

COMMENTS AND RESPONSES

COMMENT 1: Many of the commenters expressed concern with respect to health related issues. Ocular problems were noted by Ramon Mendoza, Margaret Reffitt, Nicanor A. Salas, Don Vaughan, Doris Vaughan, Bettie Willisford and William Willisford. Cynthia Gallegos commented on lung and respiratory problems experienced by her and her family since moving to the area. Other respiratory issues were raised by Margeret Reffitt, Don Vaughan, Doris Vaughan, Bettie Willisford and William Willisford. Heart related concerns were expressed by Margaret Reffitt, Consuelo R. Robles, Elvia Salas, Don Vaughan, Doris Vaughan, Bettie Willisford and William Willisford. General concerns regarding the effects the site's emissions may have on the elderly was stated by Margaret Reffitt, Consuelo R. Robles, Elvia Salas, Marianella Salas, George L. Proctor-Smith, Marjorie Proctor-Smith, Don Vaughan, Doris Vaughan, Bettie Willisford and William Willisford. Ramon Mendoza expressed concerns regarding the effects these emissions may have on children who spend considerable amounts of time outside.

RESPONSE 1: For many permits, potential impacts to human health and welfare or the environment are determined by comparing air dispersion modeling predicted emission concentrations from the proposed facility to appropriate state and federal standards and effects screening levels.^{1, 2, 3} The specific health-based standards or guidance levels employed in evaluating the potential emissions include the National Ambient Air Quality Standards (NAAQS); TCEQ standards contained in Title 30 of the Texas Administrative Code (30 TAC); and TCEQ Effects Screening Levels (ESLs).³

NAAQS are created by the United States Environmental Protection Agency (EPA). NAAQS are defined in the U.S. Code of Federal Regulations (40 C.F.R. § 50.2), and include both primary and secondary standards. The primary standards are those which the Administrator of the EPA determines are necessary, with an adequate margin of safety, to protect the public health, including sensitive members of the population such as children, the elderly, and individuals with

¹ See the document "Air Quality Modeling Guidelines" for details on air modeling at the TCEQ website at <http://www.tceq.state.tx.us/assets/public/permitting/air/Guidance/NewSourceReview/rg25.pdf>. Also visit the agency air modeling page at

http://www.tceq.state.tx.us/permitting/air/nav/modeling_index.html.

² Documents referenced in this response that are available on the TCEQ website are also available in printed form at a small cost from the TCEQ Publications office at 512-239-0028.

³ To view the ESL list or obtain more information on ESLs, visit the TCEQ website at http://www.tceq.state.tx.us/implementation/tox/esl/list_main.html.

existing lung or cardiovascular conditions. Secondary NAAQS are those which the Administrator determines are necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse effects associated with the presence of an air contaminant in the ambient air. The standards are set for criteria pollutants: ozone, lead, carbon monoxide, sulfur dioxide, nitrogen dioxide, and respirable particulate matter. "Criteria pollutants" are those pollutants for which a NAAQS has been established.

For most permit applications, air quality analysis is performed. After a permit application's modeling review is complete, in most instances, the modeling results are then sent to the TCEQ's Toxicology Division to evaluate whether emissions from the proposed facility are expected to cause health or nuisance problems. The Toxicology Division reviews the results from air dispersion modeling by comparing those results to the TCEQ Effects Screening Levels (ESLs). However, emissions from certain industries on the toxicology section "screening list" do not require a toxicology impacts review. Emissions of particulate matter from facilities like rock crushers, concrete batch plants, and soil-stabilization plants are included on the screening list because the PM emissions are not expected to have adverse impacts. If the proposed facility is operated as required in the permit, emissions are expected to be within state and federal limits and there should be no adverse health effects.

For this specific permit application, appropriate air dispersion modeling was performed. The likelihood of adverse health effects caused by emissions from Fred Webber, Inc.'s facility occurring in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions, was determined by comparing the facility's predicted air dispersion computer modeling concentrations to the relevant state and federal standards and ESLs. The permit reviewer used modeling results to verify that predicted ground level concentrations from the proposed facility are not likely to adversely impact off-property receptors. TCEQ background concentrations from the geographic area surrounding the site or other appropriate background are added to the modeled concentrations when applicable. The overall evaluation process provides a conservative prediction to be protective of the public. The modeling predictions were reviewed by the Air Dispersion Modeling Team (ADMT) of the TCEQ Air Permits Division, and the modeling analysis was determined to be acceptable.

The NAAQS for PM₁₀ is based on a 24-hour time averaging period, while the NAAQS for PM_{2.5} is based on both a 24-hour time averaging period and an annual time averaging period. The measurement for predicted concentrations of air contaminants in modeling exercises is expressed in terms of micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). One microgram is 1/1,000,000 of a gram, or 2.2/1,000,000,000 of a pound (approximately the weight of a dust mite) of air contaminant per cubic meter of ambient air. The air volume of a cubic meter is approximately the size of a washing machine. Predicted air concentrations of PM₁₀ occurring below the 24-hour NAAQS limitation of 150 $\mu\text{g}/\text{m}^3$ and of PM_{2.5} occurring below the 24-hour and annual NAAQS limitation of 35 $\mu\text{g}/\text{m}^3$ and 15 $\mu\text{g}/\text{m}^3$, respectively, are not expected to exacerbate existing conditions or cause adverse health effects.

Modeling for this facility was accomplished using the EPA approved air dispersion modeling program AERMOD (Version 11103). Due to the large size of the current site, and to capture the

geographic terrain of the entire site, the modeling was conducted using a study area radius of two kilometers (1.24 miles). To capture variations in weather conditions such as wind speed and direction, the evaluation considered meteorological data over a five year period.

The resultant maximum ground level concentration (GLC_{max}) of PM₁₀ occurring at the facility's property line was found to be 4 µg/m³, which is below the *de minimis* value of 5 µg/m³. The *de minimis* value is defined as that value below which a significant change in air quality is not anticipated due to these emissions. For PM_{2.5} emissions, the resultant GLC_{max} value at the facility's property line was found to be 0.6 µg/m³ (24-hour) and 0.01 µg/m³ (annual), which are also below the *de minimis* values of 1.2 µg/m³ and 0.3 µg/m³ respectively.

In addition to complying with the federal and state standards and guidelines mentioned above, applicants must also comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically the rule states, "No person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facility is operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected. According to the facility's maximum allowable⁴ emission rate table in the draft permit, the facility will emit approximately 14.64 tons per year of total PM of which 5.42 tons per year will be (PM₁₀), and 0.77 tons per year will be (PM_{2.5}). These emissions are not expected to create nuisance conditions.

In summary, based on the potential concentrations reviewed by the Executive Director's staff, it is not expected that existing health conditions will worsen, or that there will be adverse health effects in the general public or sensitive subgroups as a result of exposure to the expected levels of PM₁₀, or PM_{2.5} emissions.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with the terms of any permit or other environmental regulation by contacting the TCEQ Regional Office at (817-588-5800), or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has long had procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-

⁴ The term "allowable" means the maximum emission rate of a specific pollutant from a given source, as specified in the permit.

0028, and may be downloaded from the agency website at www.tceq.texas.gov (under Publications, search for document no. 278).

COMMENT 2: Ramon Mendoza, Patricia ODell, Margarita Patterson, Margaret Reffitt, Consuelo R. Robles, Elvia Salas, Marianella Salas, Nicanor A. Salas, George L Proctor-Smith, Marjorie Proctor-Smith, Don Vaughan, Doris Vaughan, Bettie Williford and William Williford expressed concern because they live on the land and consider themselves to be in close proximity to the Applicant's facilities. Livestock is raised on the land by Ramon Mendoza, George L Proctor-Smith, Marjorie Proctor-Smith, Don Vaughan, Doris Vaughan, Bettie Williford and William Williford and organic gardening is conducted by Margarita Patterson and Marianella Salas.

RESPONSE 2: As was stated previously in Response 1, the Administrator of the EPA has also determined what has been defined as the secondary NAAQS. The secondary NAAQS are those which the Administrator determines are necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse effects associated with the presence of an air contaminant in the ambient air. The standards are set for criteria pollutants: ozone, lead, carbon monoxide, sulfur dioxide, nitrogen dioxide, and respirable particulate matter (PM). "Criteria pollutants" are those pollutants for which a NAAQS has been established.

For consideration of PM emissions, the secondary NAAQS have been set at the same limitation values as the primary NAAQS. Since it has been established that the facility's emissions at this location will meet the primary NAAQS, the facility's emissions will also meet the secondary NAAQS at the same level of *de minimis* concentrations. Thus, based on the potential concentrations reviewed by the Executive Director's staff, it is not expected that existing air quality conditions will worsen, or that there will be adverse effects in the animal life, crops, vegetation, and buildings as a result of exposure to the expected levels of PM₁₀ or PM_{2.5} emissions.

COMMENT 3: George L. Proctor-Smith and Marjorie Proctor-Smith commented that rock hauling trucks on the local gravel roads keep the roads in a constant state of disrepair.

RESPONSE 3: The TCEQ's jurisdiction is established by the Legislature and is limited to the issues set forth in statute. The TCEQ is delegated the authority to evaluate emissions from facilities. In accordance with the general definitions documented in TEXAS HEALTH AND SAFETY CODE § 382.03(6), "[a] mine, quarry, well test, or road is not considered to be a facility" and, thus, the TCEQ does not have jurisdiction to evaluate the emissions from these potential sources. Accordingly, the TCEQ does not have jurisdiction to consider road traffic when determining whether to approve or deny a permit application. However, should additional traffic result in air emissions, nuisance-related regulatory provisions may be triggered. Title 30, Section 101.4 prohibits a person from creating or maintaining a condition of nuisance that interferes with a landowner's use and enjoyment of his property.

COMMENT 4: Don Vaughan and Doris Vaughan both expressed concern regarding the potential shaking of their house due to the effects of blasting.

RESPONSE 4: The TCEQ's jurisdiction is established by the Legislature and is limited to the issues set forth in statute. The TCEQ is delegated the authority to evaluate emissions from facilities. In accordance with the general definitions documented in TEXAS HEALTH AND SAFETY CODE § 382.03(6), "[a] mine, quarry, well test, or road is not considered to be a facility." Blasting operations are associated with quarry operations, and the Texas Clean Air Act, § 382.003(6) provides that quarries are not facilities for purposes of air quality permitting. Therefore, quarry blasting operations are not included in the review of an air quality permit application or authorized under this permit. The commission has no authority to address property damage claims alleged to have resulted from blasting, nor jurisdiction regarding noise pollution or vibrations. Concerns regarding noise and vibrations should be directed to local officials.

COMMENT 5: Eddie Pevehouse noted that the application had been placed with the City Secretary of Richland and was available at the Richland Civic Center. The commenter contends that since the Richland Civic Center is open only from 9:00 am to 2:00 pm, and not open on weekends, that the application was not placed in an appropriately available public location. The commenter requested that the permit application be placed in the Corsicana Public Library as well as at the convenience store located on Highway 14 in the town of Richland. Another commenter, Diana Rawlins, also requested that the application be placed in the Corsicana Public Library.

RESPONSE 5: Section 382.056(d) of the Texas Clean Air Act (TCAA) requires the applicant to make a copy of the application available for review and copying at a public place in the county in which the facility is located or proposed to be located. This application was made available at the Richland Civic Center in Navarro County and was made available in a public place in the county in which the facility is proposed to be located. Therefore, the company has met the regulatory requirements in Section 382.056(d) of the TCAA. Additionally, Title 30, Section 39.405(g) of the Texas Administrative Code (TAC) requires that the application be available for inspection beginning on the first day of newspaper publication of Notice of Receipt of Application and Intent to Obtain Permit and remain available for the duration of the comment period, as set forth in the notice.

COMMENT 6: Diana Rawlins commented that the address given in the application had not been registered with the 911 addressing agent for the County of Navarro, State of Texas. The commenter stated that the public, therefore, did not have fair and due notice and the applicant should be required to republish the public notification.

RESPONSE 6: Title 30, Sections 39.411 and 116.132 of the Texas Administrative Code (TAC) require that notice of an application contain, among other things, a description of the location of the facility or proposed location of the facility. The Applicant provided the facility address of 7329 Southwest County Road 30, Richland, Navarro County, Texas 76681 in the application and in the public notifications. The address, as given, was determined to be sufficient to provide the public with the location of the proposed facility. There is no additional requirement that the location be registered with a county 911 addressing agent.

CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

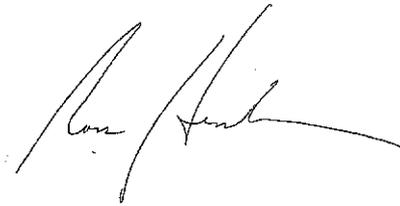
Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director
Office of Legal Services

Robert Martinez, Division Director
Environmental Law Division



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REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
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