

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Friday, June 17, 2022 2:00 PM
To: PUBCOMMENT-APD; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number 21589
Attachments: West Gin Case Hearing.docx

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From: suzy.davis@brownfieldcoop.com <suzy.davis@brownfieldcoop.com>
Sent: Friday, June 17, 2022 1:58 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 21589

REGULATED ENTY NAME WEST GIN

RN NUMBER: RN101939148

PERMIT NUMBER: 21589

DOCKET NUMBER:

COUNTY: TERRY

PRINCIPAL NAME: WEST GIN LLC

CN NUMBER: CN605608371

FROM

NAME: MRS Mary Suzanne Davis

EMAIL: suzy.davis@brownfieldcoop.com

COMPANY: Brownfield Farmers Cooperative Station

ADDRESS: PO BOX 388
BROWNFIELD TX 79316-0388

PHONE: 8066374517

FAX: 8066379746

COMMENTS: We request a contested case hearing regarding renewal of air permit 21589 (West Gin, LLC). Please see the attached word document that outlines our request. Thank you, Suzy Davis

Contested Case Hearing

1. Suzy Davis, General Manager
Brownfield Farmers Cooperative Station
P.O. Box 388
902 W. Main
Brownfield, TX 79316
806-637-4517
2. West Gin, LLC
Permit #21589
3. We request a contested case hearing
4. Brownfield Farmers Cooperative Station employees 15 full-time employees. We have been adversely affected by the excessive dust, lint and smoke that is produced by West Gin. During ginning season, the air quality is poor, necessitating an air purifier for our office. Our vehicles, equipment, inventory, fencing, etc. are consistently covered in dust and lint. These small nuisances pale in comparison to the adverse effects caused by the West Gin fires.

In December 2018, West Gin's burr pile caught on fire. These burrs were not being regularly removed from their property but were instead piled up on the same property as their cotton modules. When the pile caught on fire, the West Texas wind carried the burrs into these closely stacked modules, exacerbating the situation. The combination of burning burrs and cotton modules produced an overwhelming amount of smoke, from which we suffered severe damage. Employees and customers were evacuated the Coop and we were forced to cease operations for several days while at least six fire departments were tasked with fighting the fire. Of particular concern to the emergency responders was the proximity of the fire to the Coop's large quantities of gasoline, diesel, propane, kerosene, oil, and chemicals that are highly flammable and potentially explosive. Volunteer fire departments spent days trying to protect our property from catastrophe. Even with their efforts, the surrounding community and residents suffered severe smoke damage, as well.

The fire in December 2021 was not as large as 2018, but it did cause its share of adverse effects for both the Coop and the surrounding community. Not only did the Coop suffer fire and smoke damage to our property, but employee vehicles were also overwhelmed with smoke as well. The city requested that the burning burrs be moved to a pit west of us, but the owner of West Gin relocated the burning burrs on top of chipped up railroad ties, causing the fire to start burning again. City officials were forced to evacuate the entire neighborhood because the smoke was so pervasive. Many residents were put up in hotels to spend the night due to the heavy smoke while fire departments were once again tasked with preventing catastrophe.

5. Brownfield Farmers Cooperative Station is directly across the street south of West Gin. We are both within city limits and there are residential neighborhoods located to our north and west.

6. Brownfield Farmers Cooperative Station is an agricultural retail store. We sell fuel, propane, oil, chemical, fertilizer, seed, and hardware parts to our customers. We have bulk underground fuel storage tanks and our oil, chemical, and seed are stored in warehouses behind the store.

7. Unfortunately, West Gin continues to adversely affect Brownfield Farmers Cooperative Station and the surrounding neighborhood based on its excessive dust, lint, and smoke. These contaminants alone present enough of an issue to contest the renewal of West Gin's air permit.

Our primary basis of contestation, however, is that based on their location and the way they operate the gin, it's not a matter of *if* West Gin causes another fire, it's *when* and how severe. Our concern is for the safety of our employees and the citizens of our community.