



# Cumulative Impacts Assessment – Pilot Project Background & Project Outline

Dallas, Dallas County, Texas

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This Fact Sheet will tell you about...

- Background on the Cumulative Impact Assessment
- Current Hot Issues/Community Concerns
- Outline for the Project
- EPA Contact Information

## Background

Over the past several years, community residents in and near the City of Dallas, Texas, have expressed public health and environmental concerns regarding the operation of Concrete Batch Plants (CBPs). These plants are frequently located near residential neighborhoods, and their operations result in the emission of particulate materials and other air pollutants, which are subject to limited regulatory controls. The operation of CBPs also leads to significantly increased traffic (with associated air pollution) and noise which are also of public concern.

The primary regulatory controls that govern CBPs are the Standard Air and General NPDES Permits issued by the Texas Commission on Environmental Quality (TCEQ). Presently, the TCEQ is contemplating revisions to the Standard Air Permit, which is applicable to CBPs, and the Environmental Protection Agency Region 6 (EPA) is assessing the protectiveness of the proposed revisions to the permit's requirements by undertaking a Cumulative Impact Assessment (CIA) pilot project.

The CIA pilot project includes air modeling to evaluate if the TCEQ's CBPs standard permit contains sufficient enforceable air emission limitations to prevent violations of the Particulate Matter (PM10 and PM2.5) National Ambient Air Quality Standards (NAAQS); and to assess the potential for exceedances of permit limitations to impact public health and the environment in the surrounding communities.

The project will also consider how the operation of multiple CBPs within a concentrated area might impact the community when other environmental stressors are

also considered. It will integrate environmental data gathered through soil, water and fish tissue sampling, and consider the effects of non-chemical stressors in the community. The underlying goal of the project is to consider how the combination of CBPs, and nonregulated environmental stressors might cumulatively affect the community.

The project is focusing on the West Dallas and Joppa communities. EPA worked with residents and leaders in these communities to select sampling locations, and best approaches for keeping the public informed about progress. Monthly update meetings between EPA and community groups are on-going and will continue through project activity. Once the project is complete, EPA will draft a summary report, and discuss it during at least one community meeting.

## Hot Issues/Community Concern

### *Texas Star Ready Mix*

Texas Star Ready Mix has been in operation since the 1950's. The facility has been authorized to operate under minor source permits by rule since the 1970's. An inspection in September 2022 found that the facility was unable to meet the requirements for their permit authorizations and was informed they had to obtain the concrete batch plant standard permit in order to continue operations. Texas Star Ready Mix submitted an application for an initial Concrete Batch Plant Standard Permit on January 30, 2023, and notice of that application was published on March 17, 2023.

Community members reached out to EPA with concerns about the public participation process for the standard permit. A main concern was that the public meeting was to be held in downtown Dallas approximately 9 miles from Joppa (driving time is 20 minutes in little traffic). The location was the Crown Plaza Hotel (near the EPA office) where parking is \$20 at the hotel and nearby parking is about half that. EPA sent a letter to TCEQ requesting that the public meeting location be changed or accommodations be made for the public to attend. The company agreed to pay for the parking and PQC arranged for a bus to transport residents.

The application was recently (02/01/24) placed into a deficiency cycle (likely the application was found to be missing needed information). The TCEQ website does show that a draft RTC was sent to legal on 11/29/2023.

### **Outline for the Project**

#### **Air Modeling**

- Air modeling will be performed to determine if the proposed Concrete Batch Plant (CBP) Standard Permit (SP) is protective of the NAAQS when more than one facility is in operation in an area.
- Modeling will also take into consideration the emissions from mobile sources (traffic) and other industrial facilities in the area.
- Air modeling will assess the dispersion of particular matter (PM 10, PM 2.5), Silica, Nickel, Formaldehyde, and other toxic air pollutants.
- The completed air modeling will characterize the cumulative impact of CBPs facility emissions plus other nearby permitted air sources.

#### **Water Sampling and Fish Tissue Analysis**

- In locations where recreation is likely, water samples will be collected and analyzed for Fecal Coliform Bacteria (E. coli).
- In locations potentially affected by stormwater runoff from CBPs, water samples will also be analyzed for pH, alkalinity, conductivity, total suspended solids, and metals.
- In locations identified as likely public fishing spots, fish tissue will be collected and analyzed for mercury.

#### **Soil Sampling and Analysis**

- Soil samples will be collected in parks, schools, common areas or other EPA approved locations.
- Samples will be analyzed for metals, mercury, cyanide, pH, VOCs, and SVOCs.

#### **Cumulative Impact Assessment Report**

- After air modeling, water and fish tissue monitoring, and soil sampling is completed, EPA and its technical contractor will develop a final report assessing the environmental data collected and the sociological and other risk factors considered through the CIA.

**For more information from the EPA, please contact:**

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