

Hudspeth County
Court of Commissioners, Precinct 3
Honorable Johny R. Sheets, Commissioner
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915.250.9925

01 June 2022

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC105
P.O. Box 13087
Austin Texas 78711-3087

R.E. Permit Number WQ0004636000

I am writing concerning Permit Number WQ0004636000, GCC Sun City Materials, LLC, 1 McKelligon Canyon Road, El Paso Texas 79930. EPA ID no. TXL 005012.

As Commissioner for the Precinct 3 of Hudspeth County, Desert Haven TX, and a resident, I would like to protest this application. Being a resident, I am against renewing this application for the following reasons:

- a. the monofil area is within three miles of my residence.
- b. the smell in the summer months is atrocious when the wind comes from the north and northeast.
- c. the trucks when they are full and empty (when one drives behind them) the odor is unbearable to smell.
- d. what is this sewage sludge doing to our drinking water? Our aquifer is about 6 miles to the west of the Sludge pit.
- e. How many tons of sludge does the sludge pit contain?
- f. What will happen to this pit, once it is full?
- g. Minerals and Pharmaceuticals - we are concerned about water and environmental contamination.

As County Commissioner, I protest this Application for Renewal and I would like to see that a Contested hearing is scheduled, so that I and the people of Deer Mountain Ranchettes, Desert Haven. TX have our say in this matter, for reasons including:

- a. Gary Lee Ave Is a private road which belongs to the residents of Gary Lee. The semi-trucks have to use this road for 3.3 miles to the Monofil business. See map.
- b. Gary Lee Rd, has 39 residences on the way to the Sludge site - their property values are thereby unfairly and disproportionately affected. See map.

- c. The nearest residential house to the sludge dump is 0.6 miles away from the front gate. See Map.
- d. Residents are being continuously dusted out as the semi-trucks are driving (at high rate of speed) by their house.
- e. Residents have to smell the foul stench of these trucks as they pass by their house (loaded and unloaded).
- f. What are the impurities (minerals and pharmaceuticals) that are in the sludge, do they leach or stay in the soil, and for how many years? I am asked as a commissioner, but do not have the answer.
- g. The road is being damaged by these trucks on Gary Lee Rd; people have been complaining about the road conditions to me. I cannot do anything legally until this road is placed into the county road system, until then this road is a private road belonging to the property owners.
- h. Semi-trucks are speeding along Gary Lee Rd and are a hazard and with them throwing rocks from their tires making it a very unsafe condition. Half of the road is paved, while the other half is gravel.
- i. The number of trucks which travel Hueco Ranch Rd and Gary Lee are anywhere from 15 to 20 truckloads a day.
- j. These trucks are driving down these streets, starting anywhere from 5 a.m. till 7p.m. Six days a week, including holidays.
- k. The residents along Hueco Ranch Road are in the same predicament as the families on Gary Lee RD. dust, noise, and odor. There are 14 houses right beside the road, more if you count all houses in the vicinity of the road. See map.
- l. Hueco Ranch Rd is a county road - this County does not have the funds to repair the road. Eighty-thousand-pound trucks damage the road quite a bit. These trucks are damaging a culvert bridge that may have a load limit of 26 thousand pounds(unknown). If this bridge becomes unusable or damaged, then the Deer Mountain residents do not have another way out of this subdivision. Potholes are constantly being made in the road; the edge of the road is being broken off in large chunks. During monsoon season this road is a flood problem.
- m. These trucks are damaging the road of U.S. Hwy 62/180, and Hueco Ranch Road. The stop sign is constantly being run over and the edge of the road is frequently damaged.
- n. The two roads that these semi-trucks use are constantly having problems with potholes.
- o. People moved out into Deer Mountain to get away from all the noise and traffic of the city.
- p. Our County is an economically depressed county and the County is not receiving adequate funds or a sufficient rate of tax collection from the sludge dump operation, which El Paso Water and GCC are transporting in this County - as a newly appointed VP of the Hudspeth County Central Appraisal District I will be working to rectify this.
- q. To my knowledge, GCC Sun City Materials LLC, is transporting all the sludge from six (6) sewer plants and disposing of the materials here in Desert Haven, Hudspeth County.
- r. Each truck can carry up to 25 tons of sewage sludge to the fill site. (15 to 20 trucks).
- s. These trucks carry wet sludge and dry sludge, some is split out on the road when it is wet.
- t. There are 178 families living in Deer Mountain Estates, approximately 400 to 450 people, who have to put up with the constant traffic and smells of this operation.

- u. This sludge facility has 142 acres, pays approximately 7500 dollars in property tax, and two hundred fifty dollars in personnel property tax. This site pays TCEQ quite a large amount of money, if I read the Texas Local Govt Codes right.

Problems encountered with the Renewal Process

- a. As of 25 May 2022, (I checked with court house Brenda Sanchez County Clerk) there was no draft permit application, Executive Director's preliminary decision, for viewing at the Hudspeth County Courthouse, 109 Millican str. Sierra Blanca, TX. It is 80 miles to Sierra Blanca one way, who would drive that far to see an application.
- b. As of 30 May 2022, there was no notice of this permit application, in our newspaper, Hudspeth County Herald. (Newspapers Can be provided)
- c. As of 30 May 2022, there were only three people that received a "Notice of Application and Preliminary Decision for Disposal of Sewage Sludge and Water Treatment Plant Residuals Permit. These people were the once complained about water or the sludge pit. Mailing list can be obtained at Cerra Alto Water System by TCEQ, or GCC Sun City Materials.
- d. There were no notices received about the original Application process, I recall the Hudspeth County Herald did have the notice posted. The number of subscribers to this newspaper is very low in our area, Deer Mountain Ranchettes, Desert Haven, TX.
- e. The continuous complaints (to me, as the commissioner PCT3 Hudspeth County) from the residents, will bring widespread opposition to the sludge pit, and to giving GCC Sun City Material a renewal.
- f. I as a commissioner would like to know how many tons of the sludge is being dumped a year. I could not find out though the TCEQ web site. Please provide the information.
- g. Why is GCC dumping this sludge in Hudspeth County, versus El Paso County?

As the Commissioner of Hudspeth County Precinct Three I will ask for a public and contested hearing for the Monofil site, in Hudspeth County Texas. Please note this letter will be filed in the court house as a public record.

Any further information or questions please contact me.

Regards,

Johny R. Sheets, Commissioner
Hudspeth County
Court of Commissioners, Precinct 3
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915.250.9925

cc: Cesar J. Blanco, Senator, Texas, 29th District
cc: Eddy Morales, Representative, Texas, 74th District
cc: Tony Gonzales, US Congressman, 23rd District of Texas





