

# *The Medina County Environmental Action Association, Inc.*

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April 18, 2006

Bobby Caldwell  
Texas Commission on Environmental Quality  
14250 Judson Rd.  
San Antonio, TX 78233-4480

Re: Vulcan Materials Company  
Proposed Quihi quarry  
WPAP

Dear Mr. Caldwell:

MCEAA wishes to submit these additional comments and questions to TCEQ concerning Vulcan Materials Water Pollution Abatement Plan, some of which resulted from a technical review by MCEAA's consulting engineer.

1. In the Sections relating to TAC 123.5 (6), page 4, number 27, it states there will be no discharges of storm water to surface water or sensitive features. We disagree with this statement. The discharge from containment basins into the Polecat and Elm Creeks supports this statement, as there are sensitive features in those drainage areas within the quarry (and over the recharge zone as well as downstream).
2. Why isn't the area to be quarried considered to be impervious cover to some extent?
3. How will rainfall be contained entirely in the pit area, especially during the pit's early development period, and in times of heavy rainfall?
4. Where will the water from the recycling plant be applied? This is an important question, particularly in the early development of the quarry, considering that the soils have a low infiltration rate.
5. What protective measures, if any, are there for the sensitive features in the areas to be quarried, such as SC-S2, SC-S14, WZ-S45, WZ-S71, WZ-S73, SC-S22, SC-S23, SC-S24, SC-S25, BS-S29, BS-S31, and WZ-S72 (in the Polecat Creek flood plain)? If there are no protective measures, why not?
6. The total impervious cover is stated to be 1.62%. We believe this figure is erroneous when considering the fifty-year life of the quarry. Therefore the impervious cover determination must be recalculated and its effect on the Edwards Recharge Zone capability reconsidered.
7. In light of 6 above, there should be calculations for the TSS removal from the quarry area that would indicate higher runoff coefficients.
8. How will the quarry be graded initially to prevent storm water runoff? There are no temporary or permanent runoff controls shown on the plans in the quarry area to reduce off site transport of the increased TSS.
9. What happens to the water used in the cleaning processes after it is no longer capable of being recycled? What is its' composition or contents? If not analyzed periodically, how can one be sure that it is safe to be utilized over the quarry or other areas of the Edwards Aquifer Recharge Zone?
10. Has the quarry undergone research in regard to preliminary grading, quantities, or quarry capacity in order

to determine if this (quarries location) is a viable option? This information would dictate how storm water runoff will be addressed in the future of the quarrying process and be important in flood prevention (i.e., runoff calculations).

11. Very little detail is given regarding the quarrying process or the transport of processed material from the plant site by trucks or rail line. The latter has been stated to be part of the quarry and may affect storm water runoff due to its placement in the Elm Creek flood plain. This needs to be addressed.

We would like the above to be considered with appropriate responses to our questions. We believe the above additional questions and comments support our belief that this quarry's location and operation together with its proposed rail line offer evidence that this WPAP should not be accepted by TCEQ. Because of the, size, scope, and location of this proposed quarry, we again ask for a public meeting to discuss our questions and comments with TCEQ and Vulcan staff.

Sincerely,

Robert T. Fitzgerald, President

CC: Robert Potts, Edwards Aquifer Authority  
U.S. Congressman Henry Bonilla  
State Representative Tracy King  
Victoria Rutson, US DoT, Surface Transportation Board  
Medina County Judge Jim Barden  
Chris Mitchell, Pct. 1 Commissioner, Medina County  
Pat Brawner, Medina County Flood Plain Administrator  
Con Mims, Nueces River Authority  
Fred Wells, Medina County Groundwater District  
State Representative Carlos Uresti

*MCEAA, for your Home, Health, and Heritage*