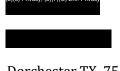
# Title VI Civil Rights Complaint



Dorchester, TX, 75459



June 24, 2025

To:

U.S. Environmental Protection Agency

External Civil Rights Compliance Office (ECRCO)

Mail Code 2310A

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Email: Title\_VI\_Complaints@epa.gov

Subject: Title VI Complaint Against Texas Commission on Environmental Quality (TCEQ) Regarding Air Permit Nos. 167047, PSDTX1602, and GHGPSDTX212 for BM Dorchester LLC Cement Kiln

### 1. Complainant Information

- Name: (b)(6) Privacy, (b)(7)(C) Enf. Privac
- - Address: (b)(6) Privacy, (b)(7)(C) Enf. Privacy

  Dorchester, TX,75459
- Phone: (b)(6) Privacy, (b)(7)(C) Enf. Privacy
- Email: (b)(6) Privacy, (b)(7)(C) Enf. Privacy
- - Representing: Myself and the residents of Dorchester, Texas

## 2. Recipient of Federal Funds

- - Agency Name: Texas Commission on Environmental Quality (TCEQ)
- Address: 12100 Park 35 Circle, Austin, TX 78753
- - Federal Assistance: TCEQ receives federal funds from the U.S. EPA, including funds under the Clean Air Act and Clean Water Act.

#### 3. Name of the Permit or Action in Question

- Permit Holder: BM Dorchester LLC
- - Permit Numbers: 167047, PSDTX1602, GHGPSDTX212
- - Facility Type: Portland Cement Kiln
- - Location: Dorchester, Grayson County, Texas

## 4. Description of Discriminatory Effect

TCEQ's approval of this air permit discriminates against a predominantly rural, low-income population in Dorchester by:

- - Siting a high-emission industrial facility adjacent to the Dorchester, which functions as a worship space, civic center, and homeschool educational facility.
- - Ignoring proximity to children and vulnerable residents.
- - Dismissing legitimate community concerns over air quality, odors, and health.
- - Failing to conduct any environmental justice analysis or health impact study.
- - Issuing a permit it cannot enforce due to chronic staffing shortages.

## 5. Request for Relief

I request that EPA:

- 1. Initiate a Title VI investigation into TCEQ's handling of this permit.
- 2. Require TCEQ to conduct an EJ and health impact assessment.
- 3. Suspend or revoke the permit pending that assessment.
- 4. Mandate meaningful community engagement.
- 5. Provide transparency about civil rights compliance.

#### **6. Supporting Documentation**

- TCEQ RTC
- - Permit Conditions
- - Administrative Record
- - Community and church usage statements
- - Public objections
- TCEQ enforcement capacity reports

#### 7. Certification

I certify that the information provided is true and accurate to the best of my knowledge.