

Title VI Civil Rights Complaint

(b)(6) Privacy, (b)(7)(C) Enf. Privacy

Dorchester, TX, 75459

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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. Privacy
- 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 (b)(6) Privacy, (b)(7)(C) Enf. Privacy of 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.