



Interoffice

MEMORANDUM

To: David P. Jones, Chief Planner
From: James R. Cummings, Environmental Services Director *JRC*
Re: **SU190404 – Concrete Batch Plant – 2400 West Hunter Ferrell Road**
Date: April 26, 2019

ENVIRONMENTAL SERVICES DEPARTMENT – DENIAL RECOMMENDATION

The proposed project involves the construction of a permanent concrete batch plant on the property located at 2400 West Hunter Ferrell Road. This site is immediately adjacent to an Irving residential area to the north across West Hunter Ferrell. Concrete batch plants are heavy industrial operations that usually operate on a 24/7 basis. During warm weather months, the operations run at a high rate in the early morning hours, before sunrise, to produce product that can be transported out to job sites before the onset of the heat of the day. Such facilities are constantly receiving loads of sand, aggregate, fly ash, potash and cement. Some of these ingredients are loaded into storage silos via pneumatic pump systems on delivery trucks. The aggregate is stored in stock piles on the site. The ingredients are combined on site and loaded into mixer trucks for delivery to job sites.

The near constant operations that occur at these types of facilities result in a continuous stream of truck traffic arriving and leaving the site. This traffic combined with the materials handling operations on the site pose a significant potential for creating a noise nuisance. The noise study conducted by the applicant states that the pneumatic delivery pumps are a significant source of noise. Staff has had recent experience in dealing with these types of systems and can verify that these systems can exceed 100 dB(A) when in operation. The city's noise ordinance would require this facility to comply with the residential standard (65 dB(A) during daytime hours/58 dB(A) during nighttime hours) at the boundary with the residential properties to the north. Staff believes that the combination of the pneumatic unloading operations, other material handling operations, concrete processing, and the loading of mixer trucks will result in an operation that is unlikely to be able to comply with the city's noise ordinance. This noncompliance would result in a significant nuisance condition for the nearby residents, especially during nighttime hours.

Additionally, all of the ingredients utilized in the concrete production produce fine particulate matter (dust). With the prevailing winds for this site being from the south/southeast, the residential area will be impacted by this dust issue on an almost daily basis.

Based on our understanding of this proposed operation, the Environmental Services Department does not believe that it is compatible with the residential neighborhood immediately adjacent to this location. The Environmental Services Department recommends denial of SU190404.