

SB 471 by Sen. Springer

Opposition testimony by Public Citizen

To the Senate Committee on Water, Agriculture, and Rural Affairs

March 13, 2023

There is no one-size-fits-all strategy for addressing complaints at TCEQ.

Or

The squeaky wheel gets the grease.

Adrian Shelley
Texas Director, Public Citizen
512-477-1155, ashelley@citizen.org

Summary of our position

- **We oppose SB 471** because complaints are an important tool for TCEQ and community members.
- TCEQ's enforcement division does not keep up with violations of pollution laws meant to protect our health.
- Only a small number of TCEQ investigations are complaint based.
- Three case studies show that when complaints are frequent, there is usually a serious underlying issue.
- There is no indication that TCEQ has trouble dealing with vexatious complainants.
- Charging community members to make complaints will have a chilling effect on enforcement of pollution laws.

TCEQ's Enforcement Division simply cannot keep up



Illegal Air Pollution in Texas, 2020

COVID Recession Leads to Drop in Reported Emissions

EMBARGOED FOR RELEASE
October 14, 2021

EIP ENVIRONMENTAL
INTEGRITY PROJECT

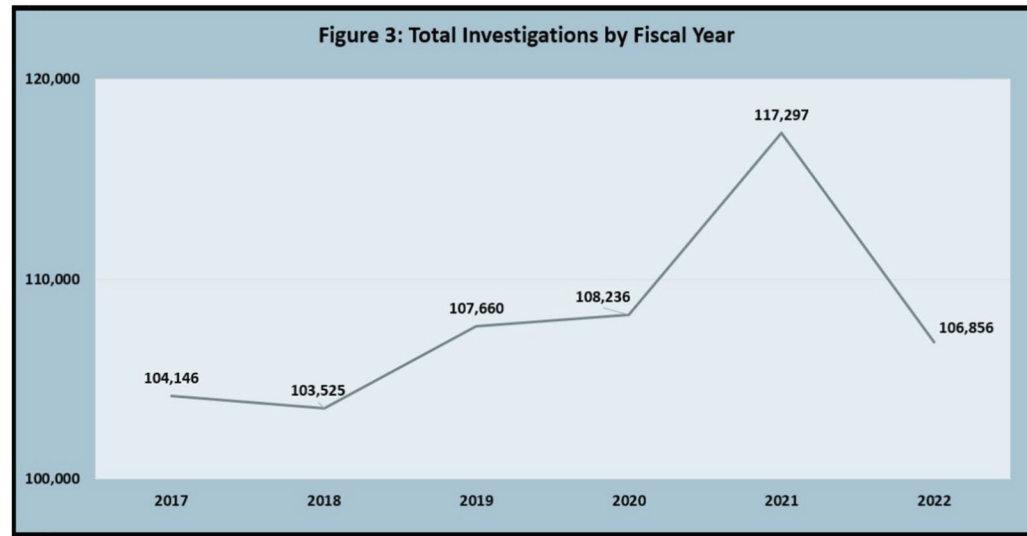


“Looking back over the last nine years, the total number of enforcement orders filed by TCEQ for air pollution events is *less than 3 percent* of the total number of unauthorized air pollution events recorded by the agency in that time.”

Note that this is the record for industry self-reported violations of the law.

<https://publicinterestnetwork.org/wp-content/uploads/2021/10/Illegal-Air-Pollution-in-Texas-2020-EMBARGOED-for-10-14-21.pdf>

Less than 5% of TCEQ investigations are complaint based

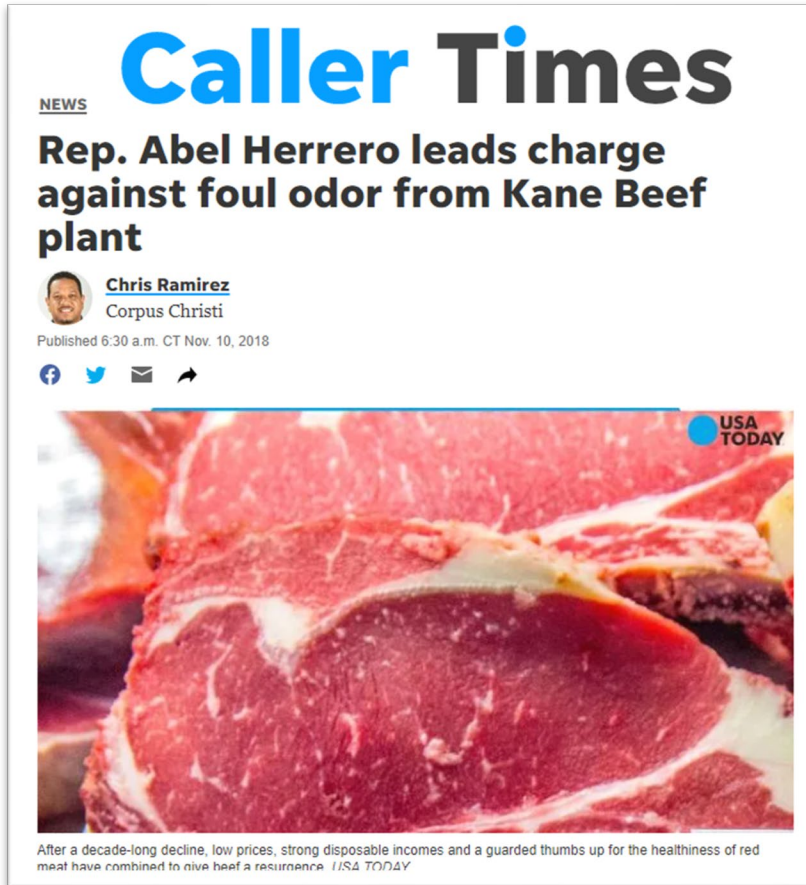


	Percentage of Investigations based on a complaint
2017	4.8%
2018	4.4%
2019	4.6%
2020	4.3%
2021	4.0%
2022	4.9%

Case Study 1: Sam Kane/STX Beef

- This beef processing plant in Corpus Christi bothered neighbors for years with foul odors.
- TCEQ finally investigated and fined the company.
- Investigation found “pile of raw guts and pile of raw bone material” outside.
- The investigation happened after ***eight complaints were filed*** across three days in a single week.
- Complaints continue to pour in, with 565 complaints in total, including 15 so far this year.

Repeated newsworthy complaints



Corpus Christi Caller Times

November 10, 2018

<https://www.caller.com/story/news/2018/11/10/rep-abel-herrero-leads-charge-against-foul-odor-kane-beef-plant/1948225002/>



Action 10 News KZTV, December 3, 2019

<https://www.kztv10.com/news/local-news/stx-beef-processing-says-theyre-working-on-foul-odor-complaints>

Eight complaints in one week



TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Questions or Comments >>

Search

CR Query

TCEQ Home

TCEQ Web Access to Complaint Information

Your search returned 565 records. You may also view and save this list with additional fields (county, region) as an [Excel spreadsheet](#).

Page << < 3 4 5 6 7 8 9 10 11 12 > 201-250 of 565 Records

344646	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/21/2020
344642	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/22/2020
344592	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/22/2020
344451	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/20/2020
344381	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/20/2020
344360	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/19/2020
344358	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/20/2020
344342	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/19/2020
344029	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/14/2020
344025	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/14/2020
343989	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/14/2020
343702	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/10/2020
343562	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	10/08/2020

Search RN100664986 at <https://www2.tceq.texas.gov/oce/waci/index.cfm>.

Complaints lead to investigation & fines

Executive Summary – Enforcement Matter – Case No. 60162
STX Beef Company, LLC
RN100664986
Docket No. 2020-1565-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Sam Kane Beef Processors, 9001 Leopard Street, Corpus Christi, Nueces County

Type of Operation:

Rendering plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: The complainant has expressed an interest in this matter but does not wish to speak at Agenda.

Texas Register Publication Date: September 24, 2021

Comments Received: No

Penalty Information

Total Penalty Assessed: \$7,625

Amount Deferred for Expedited Settlement: \$1,525

Total Paid to General Revenue: \$6,100

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): October 14, 2020, October 15, 2020, October 19, 2020, and October 20, 2020

Complaint Information: Alleged a strong and foul odor of dead animals was coming from the Respondent's facility.

Date(s) of Investigation: October 20, 2020

Date(s) of NOE(s): December 4, 2020

TCEQ's
enforcement
report sites **four
consecutive
complaints** as
leading up to the
investigation.

Complaints continue today

TCEQ Web Access to Complaint Information

Your search returned 565 records. You may also view and save this list with additional fields (county, region) as an [Excel spreadsheet](#).

Page **1** [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) [8](#) [9](#) [10](#) > >> **1-50 of 565 Records**

Complaint Tracking # ▼	RN	RE Name	Associated Customer	Status ?	County	Received Date
396323	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	03/01/2023
396321	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	02/28/2023
395884	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	02/21/2023
395766	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	02/21/2023
395075	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	02/07/2023
394992	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	02/06/2023
394644	RN100664986	SAM KANE BEEF PROCESSORS		CLOSED	NUECES	01/30/2023
394096	RN100664986	SAM KANE BEEF PROCESSORS	CN604321414 SAM KANE BEEF PROCESSORS LLC	CLOSED	NUECES	01/19/2023
393851	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	01/17/2023
393613	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	01/10/2023
393387	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	01/07/2023
393377	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	01/06/2023
393372	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	01/07/2023
393368	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	01/06/2023
393290	RN100664986	SAM KANE BEEF PROCESSORS	CN605627124 STX BEEF COMPANY LLC	CLOSED	NUECES	01/06/2023

Search for RN100664986 at <https://www2.tceq.texas.gov/oce/waci/index.cfm>.

Case Study 2: Blue Ridge Landfill

- This landfill in Pearland has received **5,540 complaints** since 2004.
- A 2016 enforcement action came only after a high volume of complaints over two months.
- In 2018, the company faced lawsuits and a TCEQ-imposed odor control plan.
- Complaints continue, and TCEQ now issues a quarterly review of citizen complaints.
- Despite this, the company still has a “satisfactory” compliance history rating.
- Complaints continue to this day.

Landfill located next to a Pearland neighborhood



Google Earth at 29°33'13.59"N; 95°26'39.45"W

2016 enforcement followed a series of complaints

Executive Summary – Enforcement Matter – Case No. 53555
Blue Ridge Landfill TX, LP
RN102610102
Docket No. 2016-1923-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Blue Ridge Landfill, 2200 Farm-to-Market Road 521, Fresno, Fort Bend County

Type of Operation:

Landfill

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: The complainant(s) have expressed an interest in this matter but do not wish to speak at Agenda.

Texas Register Publication Date: April 28, 2017

Comments Received: No

Penalty Information

Total Penalty Assessed: \$43,712

Amount Deferred for Expedited Settlement: \$8,742

Total Paid to General Revenue: \$17,485

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$17,485

Name of SEP: Texas Association of Resource Conservation and Development

Areas, Inc. (Third-Party Pre-Approved)

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Page 1 of 5

Investigation Information

Complaint Date(s): May 2, 2016 through May 6, 2016 and June 21, 2016 through June 23, 2016.

Complaint Information: Alleged there were nuisance odors coming from the landfill.

Date(s) of Investigation: May 4, 2016 through August 18, 2016 and October 18, 2016 through November 10, 2016

Date(s) of NOE(s): October 21, 2016 and January 3, 2017

TCEQ's investigation followed a **series of complaints** filed over two months.

2018: lawsuits & odor control plan

COMMUNITY IMPACT

NEWS EVERYONE GETS

HOUSTON / PEARLAND - FRIENDSWOOD / GOVERNMENT

Blue Ridge Landfill pledges to control odor amid lawsuits, property value decline



By Matt Dulin | 11:00 AM May 18, 2018 CDT



Among other changes, Republic Services Inc. said it is adding more gas wells like this one to contain odors from decomposing waste.

Blue Ridge Landfill has a state-approved plan to remedy its odor problem, but residents who have borne the brunt of it say the measures are not bringing relief swiftly enough.

Community Impact, May 18, 2018

<https://communityimpact.com/houston/pearland-friendswood/city-county/2018/05/18/blue-ridge-control-odor/>

BLUE RIDGE LANDFILL

FORT BEND COUNTY, TEXAS

ODOR CONTROL PLAN

Prepared for

Blue Ridge Landfill TX, LP

April 2018

TCEQ Odor control plan, April 2018

<https://www.tceq.texas.gov/downloads/compliance/complaints/pearland/brlf-odor-control-plan.pdf>

TCEQ now provides quarterly complaint updates

Pearland Odor Complaints

Fact Sheet

Updated January 1, 2023

Subsequent to December 1, 2021, the frequency for posting updates to this information will transition to posting on the first business day following each calendar quarter. The next update will be posted on **April 3, 2023**.

INVESTIGATIONS

- In August 2015, the TCEQ Houston Region Office began receiving odor related complaints from citizens in and around the Shadow Creek Ranch subdivision.
- As of **January 1, 2023**, citizens have filed approximately **7,238** complaints and the TCEQ has conducted approximately **287** investigations into these complaints.
- Odors have been described as “garbage,” “chemical,” and “sewage” and are typically reported to occur overnight and during the early morning hours.
- The TCEQ issued a complaint investigation report and Notice of Enforcement on October 21, 2016, alleging that Blue Ridge Landfill was the source of the nuisance odors documented in investigations conducted May 4 and 5, 2016, May 23 and 24, 2016, June 6 and June 23, 2016. Information on the enforcement process is available on the TCEQ website at <https://www.tceq.texas.gov/enforcement/process.html>.
- The TCEQ performed a surface emissions monitoring investigation to assess compliance with air regulations concerning emissions from landfills in October and November 2016. The investigation report and a Notice of Enforcement letter were issued on January 3, 2017, alleging that Blue Ridge Landfill failed to perform surface emissions monitoring in accordance with the requirements of the applicable rules. Information on the enforcement process is available on the TCEQ website at <https://www.tceq.texas.gov/enforcement/process.html>.
- Investigators from the TCEQ Houston Region Office have conducted odor surveys beginning as early as 12:00 a.m. and as late as 11:00 p.m. These surveys often include multiple teams of two and have also included staff from the City of Pearland Public Works Department. **The latest odor survey was conducted on December 7, 2022. Landfill odors were not detected during this survey.**

Compliance history is still “satisfactory”

TCEQ Compliance History Search

Compliance History - RN102610102

Regulated Entity Information

RN: ? RN102610102
Name: BLUE RIDGE LANDFILL
Location: 2200 FM 521 RD
FRESNO, TX 77545-8214
County: FORT BEND
Region: REGION 12 - HOUSTON

Compliance History by Customer

There are 6 customers associated to this site. The Customer's compliance history for the site is displayed below.

1-6 of 6 Records

CN ▲	Customer Name	Related Program IDs ?	Rating	Classification	Date Rated
CN600343826	BFI WASTE SYSTEMS OF NORTH AMERICA INC	No Active IDs found. Please see the CR Query for a full list.	---	UNCLASSIFIED	09/01/2022
CN601527963	BFI WASTE SERVICES OF TEXAS LP	PSTREG 64950	0.00	HIGH	09/01/2022
CN601721657	LONGHORN EXCAVATORS INC	No Active IDs found. Please see the CR Query for a full list.	---	UNCLASSIFIED	09/01/2022
CN602820599	BLUE RIDGE LANDFILL TX LP	AIRNSR 156301 AIRNSR 161141 AIRNSR 81004 AIROP 1472 IHW 89429 MSWDISP 1505A STORM TXR05S302	0.18	SATISFACTORY	09/01/2022
CN603713595	GRISHAM & JHA GROUP LLC	No Active IDs found. Please see the CR Query for a full list.	---	UNCLASSIFIED	09/01/2022
CN605441328	BLUE RIDGE RENEWABLES LLC	AIRNSR 149416 MSWPROC 48043	---	UNCLASSIFIED	09/01/2022

1-6 of 6 Records

High volume of complaints continues

TCEQ Web Access to Complaint Information

Your search returned 5540 records. You may also view and save this list with additional fields (county, region) as an [Excel spreadsheet](#).

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Complaint Tracking # ▼	RN	RE Name	Associated Customer	Status ?	County	Received Date
394556	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/27/2023
394047	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/18/2023
393923	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/17/2023
393919	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/17/2023
393913	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/17/2023
393903	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/17/2023
393311	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/06/2023
393163	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/04/2023
393149	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/04/2023
393142	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	01/04/2023
392978	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	12/27/2022
392972	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	12/27/2022
392967	RN102610102	BLUE RIDGE LANDFILL	CN602820599 BLUE RIDGE LANDFILL TX LP	CLOSED	FORT BEND	12/27/2022

Case Study 3: Gulf Chemical & Metallurgical / Gladieux Metals Recycling

- July 2009 – Former employee tips TCEQ to GCM manipulating its water pollution data.
- May 2010 – Company pleads guilty to 11 felonies and pays \$2.75 million fine.
- Dozens of complaints are filed between 2009 and 2011.
- August 2013 – Company settles 2011 Clean Air Act lawsuit for \$7.5 million.

https://www15.tceq.texas.gov/crpub/index.cfm?fuseaction=regent.showSingleRN&re_id=489381632001134

Whistleblower complaint in 2009 leads to 11 felonies and huge fine



TOP STORY

Gulf Chemical pays \$2.75 million fine

Company officials plead guilty to skirting environmental regulations.

By NATHANIEL LUKEFAHR May 29, 2010 4



FREEPORT — Gulf Chemical & Metallurgical Corp. officials said Friday the company pleaded guilty to 11 felony violations and agreed to pay a \$2.75 million fine to end a criminal investigation into environmental violations at its Freeport plant.

Gulf Chemical officials made the agreement with Travis County prosecutors after the company was accused of manipulating its water releases at the site's catalyst recycling plant to skirt environmental regulations.

Complaints were most common during the years the company was under investigation.

TCEQ Web Access to Complaint Information

Your search returned 95 records. You may also view and save this list with additional fields (county, region) as an [Excel spreadsheet](#).

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Complaint Tracking # ▼	RN	RE Name	Associated Customer	Status ⓘ	County	Received Date
292683	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	09/19/2018
292260	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	09/14/2018
292254	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	09/13/2018
256775	RN100210129	GLADIEUX METALS RECYCLING	CN600124598 GCM LIQUIDATION CORPORATION	CLOSED	BRAZORIA	04/24/2017
175654	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	11/04/2012
175641	RN100210129	GLADIEUX METALS RECYCLING	CN600124598 GCM LIQUIDATION CORPORATION	CLOSED	BRAZORIA	11/04/2012
173508	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	09/14/2012
173349	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	09/11/2012
172736	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	08/24/2012
172733	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	08/23/2012
160308	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	10/07/2011
159417	RN100210129	GLADIEUX METALS RECYCLING	CN600124598 GCM LIQUIDATION CORPORATION	CLOSED	BRAZORIA	09/15/2011
152655	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	03/29/2011
149954	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	01/27/2011
149569	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	01/19/2011
146927	RN100210129	GLADIEUX METALS RECYCLING	CN600124598 GCM LIQUIDATION CORPORATION	CLOSED	BRAZORIA	10/30/2010
146765	RN100210129	GLADIEUX METALS RECYCLING	CN600124598 GCM LIQUIDATION CORPORATION	CLOSED	BRAZORIA	10/28/2010
146214	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	10/15/2010
146208	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	10/15/2010
145502	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	09/30/2010
145105	RN100210129	GLADIEUX METALS RECYCLING		CLOSED	BRAZORIA	09/20/2010

Citizen complaints point to further issues.

TEXAS OBSERVER

SINCE 1954

HEAVY METAL

The 'long, sordid history' of Texas' most brazen polluter.

by **FORREST WILDER**
AUGUST 1, 2012, 9:20 PM, CDT



- “Between the summer of 2009 and early 2011, residents filed more than 50 complaints against Gulf Chemical. Some were very detailed.
 - “The complainant understands that the smoke is arsenic and nickel powder”;
 - “The plume, which was not steam, measured at least one mile long, and when emissions passed overhead, it was estimated to be greater than 200 feet in diameter”;
 - Gulf is “emitting heavy acidic fumes creating a haze, acidic odor and irritating the citizen’s eyes.”

<https://www.texasobserver.org/heavy-metal/>

Clean Air Act lawsuit in 2011 leads to \$7.5 million settlement

BUSINESS INSURANCE.

Risk Management

Gulf Chemical & Metallurgical to settle Clean Air Act lawsuit for \$7.5M

Matt Dunning

August 21, 2013

Gulf Chemical & Metallurgical Corp. will pay \$7.5 million to settle a 2011 lawsuit for violation of the Texas Clean Air Act, according to the state's Attorney General.

A series of investigations by the Texas Commission on Environmental Quality conducted in 2008 and 2009 found that the Freeport, Texas-based chemical recycling and processing firm unlawfully emitted a number of potentially hazardous pollutants into the air, including ammonia, nitrous oxide, sulfur dioxide and various airborne metals, according to a statement released last week by Texas Attorney General Greg Abbott.

After issues continued at the plant, a lawsuit leads to the third largest Clean Air Act settlement in Texas history at the time.

[https://www.businessinsurance.com/article/20130821/news06/130829949/gulf-chemical-&-metallurgical-to-settle-clean-air-act-lawsuit-for-\\$75m](https://www.businessinsurance.com/article/20130821/news06/130829949/gulf-chemical-&-metallurgical-to-settle-clean-air-act-lawsuit-for-$75m)

Conclusion: Complaints work!

- Each of these cases is unique. But in all cases, a high number of citizen complaints pointed to an ongoing issue at a facility.
- Limiting a community member's ability to make complaints could lead to the worst pollution problems going unaddressed. Sometimes one complainant makes all the difference.
- TCEQ handles complaints every day. If vexatious complainants exist, let the agency deal with them.
- **Please vote no on SB 471.**

Adrian Shelley
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