



REGION 6

DALLAS, TX 75270

June 18, 2025

Via Online Submission

Andrea Poole
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: EPA Scoping Comments for the Laredo Gateway Industrial Railway Project in Webb County, Texas,
Docket Number FD 36847

Dear Ms. Poole:

The Region 6 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Surface Transportation Board (STB) consultation letter dated May 23, 2025, requesting scoping comments on environmental issues for the Laredo Gateway Industrial Railway Project in Webb County, Texas. Laredo Gateway Industrial Railway, LLC (LGIR) is seeking authority from the STB for the construction and operation of a new 13,850-foot-long rail line. The rail line would support rail-truck transloading at Gateway Industrial Rail Park, a planned warehouse development near the intersection of Interstate Highway 35 (I-35) and State Highway 255 (SH-255) north of Laredo, Texas. The review is pursuant to the National Environmental Policy Act (NEPA), and our NEPA review authority under Section 309 of the Clean Air Act.

To assist in the scoping process for this project, EPA has identified significant areas for your attention and provides program specific comments for your consideration. EPA is most interested in the Air Quality, National Pollutant Discharge Elimination System (NPDES) Permitting Program and Resource Conservation and Recovery Act (RCRA) Permits Program impacts. We offer the following comments for your consideration.

Air Quality Comments

EPA asks that the environmental document provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS) and non-NAAQS pollutants, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project. Such an evaluation is necessary to understand the potential impacts from temporary, long-term, or cumulative degradation of air quality.

EPA recommends the environmental document describe and estimate air emissions from potential construction, maintenance, and operation activities, as well as proposed mitigation measures to minimize those emissions. We recommend an evaluation of the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics):

- Existing Conditions – We recommend the environmental document provide a detailed discussion of ambient air conditions, NAAQS, and criteria pollutant nonattainment areas in the vicinity of the project.
- Quantify Emissions – We recommend the environmental document estimate emissions of criteria and hazardous air pollutants (air toxics) from the proposed project and discuss the timeframe for release of these emissions over the lifespan of the project and describe and estimate emissions from potential construction activities, as well as proposed mitigation measures to minimize these emissions. The environmental document should also consider any expected air quality/visibility impacts to Class I Federal Areas identified in 40 CFR Part 81, Subpart D.
- Specify Emission Sources – We recommend the environmental document specify all emission sources by pollutant from mobile sources (on and off-road), stationary sources (including portable and temporary emission units), fugitive emission sources, area sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention.
- Construction Emissions Mitigation Plan – We recommend the environmental document include a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the environmental document. We recommend all applicable local, state (e.g., coordination of land-clearing activities with the state air quality agency to determine air quality conditions such as atmospheric inversions prior to performing open burning activities), or Federal requirements (e.g., certification of non-road engines as in compliance with the EPA Tier 4 regulations found at 40 CFR Parts 89 and 1039) be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other toxics from any potential construction-related activities.

NPDES Permitting Comments

EPA recommends the review of the Clean Water Act (CWA) Section 402 regulations as well as 40 CFR § 122.26(b)(14)(x) and 40 CFR § 122.26(b)(15)(i) to determine when NPDES permit coverage is required for operators of construction activities to discharge stormwater from their construction activities.

RCRA Permits Program Comments

EPA recommends that the environmental document describe how hazardous and non-hazardous wastes generated during the construction (e.g. contaminated soils, solvent, oils) and operations will be properly managed in accordance with the applicable RCRA subtitle C and D regulations.

We recommend that the STB identify potential impacts from the movement of hazardous waste material by rail or trucks including risk associated with the accidental releases during the transfer or transport. The environmental document should outline the waste storage, transportation, and disposal plans with emphasis on containment measures and minimizing risks during transit.

EPA recommends that the STB evaluate potential spill risks, emergency response plans and measures to protect sensitive environmental areas such as wetlands, rivers, and groundwater from contamination.

We recommend that the environmental document address the applicability of state, federal and other relevant hazardous waste regulations, ensuring full compliance with all regulatory requirements.

We appreciate the opportunity to review this document. Please send a PDF copy of the environmental document by email to this office. If you have any questions, please contact Gabe Gruta, the project review lead, at (214) 665-2174 or gruta.gabriel@epa.gov.

Sincerely,

Houston,
Robert

Digitally signed by
Houston, Robert
Date: 2025.06.18
08:48:17 -05'00'

Robert Houston
Acting Branch Manager
Environmental Review Branch