



CITY OF DUNNELLON

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October 29, 2025

Florida Department of Environmental Protection
Division of Air Resource Management
Permit Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400
Phone: 850-717-9000

**E: FORMAL OPPOSITION TO AND REQUEST FOR DENIAL OF
Draft Air Permit No. 0830196-001-AC
Track Line, LLC - Dunnellon Facility
20365 E. McKinney Avenue, Dunnellon, Marion County, Florida**

Dear Permitting Authority:

The Dunnellon City Council, on behalf of the City of Dunnellon, hereby submits this formal opposition to Draft Air Permit No. 0830196-001-AC and respectfully demands that the Florida Department of Environmental Protection deny this permit application in its entirety.

The Department has a mandatory duty to protect Floridians and Florida's environment from air pollution and the release of toxic substances. Issuance of this permit would constitute a dereliction of that statutory obligation.

Track Line, LLC seeks authorization to operate a creosote-treated railroad tie (CTRT) shredding and grinding facility at 20365 E. McKinney Avenue in unincorporated Marion County. The applicant recently attempted this work in Alachua County completely unpermitted and once enforced by FDEP and Newberry the applicant has decided to bring this operation to Marion County. The permit application fails to demonstrate compliance with numerous statutory and regulatory provisions, including 403.021 and 403.087, F.S., and 62-296, F.A.C. Given the substantial quantities and toxic nature of the pollutants to be emitted, and the project's proximity to residential areas and an Outstanding Florida Water, the permit application fails to control pollution to the extent necessary to reasonably assure the protection of human health and environmental resources. If issued, the permit will cause harmful air pollution impacts, including the release of unconfined particulate matter, known carcinogens, and objectionable odors, to the City of Dunnellon. The application does not demonstrate adequate controls to prevent these impacts.

PRIMARY GROUNDS FOR OPPOSITION

1. Unacceptable Air Quality Impacts on Dunnellon Residents

The City of Dunnellon rejects the notion that our community should serve as a sacrifice zone for this industrial operation. The proposed facility will emit alarming quantities of harmful pollutants:

- 58.77 tons per year of particulate matter (PM)
- 33.47 tons per year of PM10
- 20.83 tons per year of PM2.5
- 67.22 tons per year of nitrogen oxides
- 67.22 tons per year of carbon monoxide
- 23.95 tons per year of sulfur dioxide
- 3.65 tons per year of volatile organic compounds

Given prevailing wind patterns and the facility's proximity to Dunnellon, these emissions will be carried directly into our community. Fine particulate matter (PM2.5) poses severe health risks to vulnerable populations including children, the elderly, and residents with respiratory and cardiovascular conditions. Pregnant women face particular danger from these pollutants: PM2.5 exposure during pregnancy is associated with low birth weight, preterm birth, restricted fetal growth, and increased risk of pregnancy complications including preeclampsia. Carbon monoxide can reduce oxygen delivery to developing fetuses, while nitrogen oxides and sulfur dioxide can exacerbate maternal respiratory conditions, compromising both maternal and fetal health. These are not abstract risks—they represent real threats to the health and futures of Dunnellon families, from before birth through every stage of life.

2. Severe Creosote Contamination Risks

The City of Dunnellon objects to the introduction of carcinogenic substances into our air. Creosote is a known hazardous substance containing polycyclic aromatic hydrocarbons (PAHs), many of which are established carcinogens. The processing of creosote-treated materials through shredding and grinding operations will generate airborne particles that transport these toxic, cancer-causing compounds into our community and watershed. The highly flammable nature of creosote-treated materials creates significant fire risk at the facility—a fire involving these materials would release massive quantities of toxic PAHs and other carcinogenic compounds directly into the air, potentially exposing the entire community to acute contamination.

The proposed mobile dome canopy is woefully inadequate to contain particulate matter onsite under normal operations, much less in the event of a fire. The handling, loading, and transportation of shredded CTRT materials presents continuous opportunities for fugitive emissions and environmental contamination.

3. Threats to Critical Watershed Resources

The City of Dunnellon is committed to protecting the Rainbow River which is essential to our community's identity, economy, and quality of life. The city opposes this facility because it poses unacceptable risks of creosote contamination to the Rainbow River through:

- Stormwater runoff from the processing site
- Airborne deposition of particulates containing creosote compounds
- Potential spills or releases during material handling and transportation

Once creosote contaminates our watershed, remediation is extraordinarily difficult, prohibitively costly, and may be impossible. The city will not accept the risk of irreversible environmental damage to our irreplaceable water resources and the inevitable loss of economic productivity that would follow. It is particularly concerning that impacts to the Rainbow River, an Outstanding Florida Water, have not been considered as part of this proposed operation. This facility directly contradicts the stringent water quality protection measures that FDEP has recently imposed upon the City itself to safeguard the Rainbow River, including comprehensive stormwater management requirements and strict prohibitions against illicit discharges. It is unconscionable that while the city faces strict regulatory requirements to protect this resource and prevent any contaminated runoff from entering our waterways, FDEP would simultaneously permit an industrial operation that threatens the very water quality standards we are mandated to maintain and creates significant risk of the illicit discharges we are obligated to prevent.

4. Fundamental Incompatibility with Community Character

The City of Dunnellon is a residential community that has deliberately cultivated and protected our natural environment, clean air and water, and exceptional quality of life. The proposed industrial facility is fundamentally and irreconcilably incompatible with our community's character, values, and vision for sustainable development. The City opposes this facility because it would establish a dangerous precedent for inappropriate industrial operations near our city boundaries and would undermine decades of careful community planning.

5. Complete Absence of Community Benefit

The City Council and staff have thoroughly evaluated this proposal and find absolutely no countervailing benefit to justify the substantial risks imposed on our community. The city opposes this permit because:

- The facility will create minimal, if any, local employment
- All processed materials will be shipped out of the area to cement kilns
- The facility provides no services, products, or benefits to our residents
- The economic activity generated will primarily benefit out-of-state corporate entities
- The negative impacts—including increased health risks, environmental degradation, reduced property values, and diminished quality of life—will be borne primarily by Dunnellon residents and our neighbors in Chatmire, a low-income, predominantly Black community that lacks municipal representation and is counting on Dunnellon to be their voice in opposition to this facility
- This proposal raises serious environmental justice concerns, as the burdens of industrial pollution would fall disproportionately on vulnerable and underrepresented communities while profits flow elsewhere

6. Inadequacy of Proposed Mitigation Measures

The City of Dunnellon opposes this permit because the proposed mitigation measures are demonstrably insufficient and unenforceable. While the applicant makes vague commitments to "reasonable precautions" to prevent unconfined emissions, the application conspicuously lacks specific, enforceable, and adequate measures to protect our community.

The claimed reliance on a mobile dome canopy, use of sprays, and immediate shipping fails to address:

- Continuous fugitive emissions during material handling, processing, and loading operations
- Substantial diesel emissions from three Tier 4 engines operating throughout the day
- Transportation-related emissions and dust generation from heavy truck traffic
- Emergency situations, equipment failures, or operational upsets
- The Unrealistic potential for outdoor storage despite stated intentions
- Inadequate monitoring and enforcement mechanisms
- Objectionable odors

FORMAL REQUEST FOR DENIAL

Based on the substantial concerns outlined above, the City Council of the City of Dunnellon formally requests that the Florida Department of Environmental Protection **DENY Draft Air Permit No. 0830196-001-AC in its entirety.**

The proposed facility poses unacceptable and unlawful risks to our air quality, water resources, public health, and community well-being. The applicant has failed to demonstrate that the project can operate without adversely impacting the City of Dunnellon. Moreover, the applicant has shown no compelling public interest that would justify imposing these severe impacts on our community.

The City of Dunnellon will not remain silent while our residents' health and safety are compromised. We urge the Department to fulfill its statutory duty to protect Florida's air resources and to safeguard our community by denying this permit application. Should you require additional information or clarification regarding our opposition, please contact me immediately.

Respectfully submitted,



Walter L. Green, Mayor

CERTIFICATION

I hereby certify that a copy of this Opposition Letter has been furnished to the following on this 29th day of October 2025:

The Honorable Ron DeSantis
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The Honorable Chairman Kathy Bryant
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Amanda L. Odom, City Clerk