



Talbot County Public Schools

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July 27, 2026

Town Council
Planning Commission
Town of Trappe
4011 Powell Avenue
Trappe, Maryland 21673

RE: Preliminary Site Plan — Atlantic Concrete Company, 402 Old Trappe Road
Concrete Batch Plant and Prestressed Concrete Manufacturing Facility

Dear Members of the Council, and Members of the Planning Commission:

I write on behalf of Talbot County Public Schools regarding the preliminary site plan submitted by Atlantic Concrete Company for approximately 37.9 acres at 402 Old Trappe Road, near the intersection of Old Trappe Road and Backtown Road.

Talbot County Public Schools does not take a position on whether the proposed use should be permitted. We understand the property is zoned Industrial (I) and that the applicant has identified the proposed uses as permitted by right within that district. Our interest is narrower and operational. White Marsh Elementary School, at 4322 Lovers Lane, lies in close proximity to the proposed site. The school operates a daily bus arrival and dismissal cycle, serves the youngest students in our system, and is a facility for which this office is responsible. We ask only that the Town's review of site design, access, and development standards account for that adjacency, and we offer the following requests in that spirit.

1. Fix the location of emitting equipment, and define the scope of Phase 2.

The preliminary plan reserves a substantial portion of the property for "Phase 2 Improvements TBD." The parcel is large enough that the batch plant could be sited several hundred feet nearer to, or farther from, the school. We ask that the approved site plan fix the locations of the batch plant, the prestressed manufacturing facility, aggregate storage, the hopper and truck conveyor system, the washout pit, and that any Phase 2 expansion be conditioned so as not to relocate emitting equipment closer to the school. Distance is the single most effective control available, and it is decided once, at site plan.

2. Establish hours of operation as a condition of approval.

The plans do not state proposed hours. Concrete batch plants commonly stage and load mixer trucks before dawn, and prestressed operations often begin earlier still. As you are aware, White Marsh Elementary's buses and family vehicles operate on a fixed morning and afternoon schedule. We ask that hours of operation be set as a condition, and that truck staging and departures be restricted during the school's arrival and dismissal windows. We will gladly provide our current schedule and routing to inform a workable restriction, if deemed necessary.



3. Require a traffic study that counts the actual trips, and an approved routing plan.

The plans do not state projected truck traffic. We ask for a study that separately counts ready-mix trips and prestressed-product trips, the latter typically moving on oversize flatbed loads, and for a routing plan that limits plant traffic that would adversely affect school bus routes and the general flow of school related traffic. In the record from comparable facilities elsewhere, truck traffic, not the plant footprint, is what generates both the safety exposure and the community complaints.

4. Make fugitive dust controls enforceable conditions rather than voluntary practices.

The Maryland Department of the Environment's own permitting guidance for concrete batch plants identifies unpaved roadways and work areas as a significant source of fugitive particulate matter, alongside aggregate transfer, truck and mixer loading, and wind erosion from stockpiles. COMAR 26.11.06.03D requires reasonable precautions to prevent particulate matter from becoming airborne from unpaved roadways and from materials being handled, transported, or stored. We ask that paved internal haul roads, scheduled sweeping, an on-site water truck, and enclosure or berming of stockpiles be written into the approval, so that they are conditions the Town can enforce rather than intentions the Town has to trust.

5. Require fenceline particulate monitoring, with data shared to the Town and to TCPS.

We ask that the applicant install continuous particulate monitoring at the property boundary nearest the school and make the data available. This is inexpensive relative to the scale of the project, and it serves the applicant's interest at least as much as ours. Where comparable facilities have monitored, the data has generally settled the question rather than inflamed it. Absent data, the debate runs on assumption in both directions.

6. Consider site-specific wind data.

We ask that the planning commission consider requiring the applicant to submit a wind rose derived from Easton Airport observations and apply it to the proposed equipment locations, so that the Town can evaluate the orientation of the operation relative to the school on evidence rather than assumption. Prevailing direction may well prove favorable; it should be demonstrated, not presumed.

7. Address washout containment and fuel storage on the record.

Phase One includes a 150-by-100-foot washout pit and a 10,000-gallon diesel fuel tank. Concrete washout water is strongly alkaline and corrosive. We ask that containment design, secondary containment for the fuel tank, and spill response procedures be addressed in the Town's review.

8. Include TCPS on notice, and clarify the scope of Commission review.

We ask to be included on the Town's distribution for any further notice regarding this application. We would also appreciate the Town's clarification of which elements of the project remain subject to Planning Commission review and which are permitted outright under the Industrial designation, so that we direct our comments where they can actually be considered.

One further matter, offered for the Town's awareness rather than as an objection is, the proposed facility includes prestressed concrete manufacturing in addition to ready-mix batching. It is our understanding that the Maryland Department of the Environment's Air Quality General Permit to Construct for Concrete Batch Plants - the



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streamlined, same-day permit under which most ready-mix plants in Maryland are authorized - expressly does not apply to facilities that manufacture concrete or cement products, or that use dry concrete or Portland cement in a manufacturing process. A facility of the description submitted would therefore appear to require an individual Permit to Construct from MDE's Air and Radiation Management Administration, which carries engineered review and a demonstration that the source will not interfere with attainment or maintenance of ambient air quality standards. We raise this only because the individual permit pathway may carry review and public participation requirements that the Town would want to sequence against its own approvals, rather than discover afterward.

Talbot County Public Schools' interest is a positive outcome for Trappe and a safe one for the children at White Marsh Elementary. Industrial investment and a well-protected nearby school are entirely compatible, but the conditions that make them compatible are set now, at site plan, and are very difficult to add later. If needed, we would welcome the opportunity to meet with the applicant and with Town staff at any point in the review, if deemed necessary.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Kevin J. Shafer".

Kevin Shafer

Director of Operations

Talbot County Public Schools

cc: Emily Jackson, Talbot County Board of Education, President
Dr. Sharon Pepukayi, Superintendent, Talbot County Public Schools
Corey Devaric, Principal, White Marsh Elementary School