



June 29, 2023

Ms. Laurie Gharis
Chief Clerk (MC 105)
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753
laurie.gharis@tceq.texas.gov

TCEQ 000
30 JUN '23 14:36

RE: Request of Golden Triangle Polymers Company LLC for Approval to Construct a Wastewater Treatment Plant Pursuant to Texas Water Code Section 26.027(c)

Dear Ms. Gharis,

Attached is a request by Golden Triangle Polymers Company LLC (GTPC) for Texas Commission on Environmental Quality (TCEQ) for approval to construct an industrial wastewater treatment plant pursuant to Texas Water Code Section 26.027(c). The industrial wastewater treatment plant will be constructed on the site of the new Golden Triangle Polymers Project (Project) that will be a world-scale greenfield petrochemicals plant located in Orange County in southeast Texas. The Project will provide a significant positive economic impact for Orange County. The timing and schedule of the construction and planned startup of the petrochemicals plant require commencement of construction of the wastewater treatment plant prior to issuance of a Texas Pollutant Discharge Elimination System (TPDES) permit for the discharge of wastewater from the Project. Details related to the Project and timelines are set out in the attached request.

As expressed in the attached request, GTPC accepts full financial responsibility for construction of the wastewater treatment plant knowing that no certainty exists relating to whether the TCEQ will issue a TPDES permit.

GTPC appreciates the opportunity to submit the request and the TCEQ's attention to this matter. If you have any questions or need additional information, please contact Ava Coleman-Ecter, Environmental Permitting Lead, GTPP, at (832) 813-4691 or via email at colemanad@cpchem.com.

Sincerely,

GOLDEN TRIANGLE POLYMERS COMPANY LLC

A handwritten signature in black ink, appearing to read "Steve Wardle", written over a horizontal line.

Steve Wardle
President

Attachment: Request of Golden Triangle Polymers Company LLC for Approval to Construct Pursuant to Texas water Code Section 26.027(c)

CC: Todd Galiga, TCEQ, Senior Attorney, Environmental law Division
Cari-Michel la Caille, TCEQ, Director, Office of Water
Robert Sadlier, TCEQ, Deputy Director, Water Quality Division
Matthew Udenenwu, TCEQ, Manager, Wastewater Permits Section
Mike Lindner, TCEQ, leader, Industrial Permits
Ava Coleman-Ecter, GTPP Environmental Permitting Lead
Sara Burgin, Bracewell LLP
Holly Fults, Burns & McDonnell

TCEQ 000

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Request of Golden Triangle Polymers Company LLC

for Approval to Construct Pursuant to Texas Water Code Section 26.027(c)

Golden Triangle Polymers Company LLC (GTPC) (CN606046183), a direct subsidiary of a joint venture between Chevron Phillips Chemical Company LP (CN600303614) (51% ownership) and an indirect subsidiary of QatarEnergy (49% ownership), has applied for a Texas Pollutant Discharge Elimination System (TPDES) permit to authorize discharge of treated industrial wastewater that will be generated by the Golden Triangle Polymers Project (GTPP or Project). The GTPP will be a new, world-scale petrochemical manufacturing facility located in Orange County, Texas. GTPC hereby requests that the Commissioners of the Texas Commission on Environmental Quality (TCEQ) approve commencement of construction of the wastewater treatment facility pursuant to Texas Water Code (TWC) Section 26.027(c) by October 1, 2023, which is likely to be prior to issuance of a TPDES permit to GTPC for the Project.

GTPC fully understands and acknowledges that Commissioner approval of construction of an industrial wastewater treatment facility pursuant to TWC Section 26.027(c) in no way guarantees that the TCEQ will issue a TPDES permit that will authorize the discharge of wastewater from the Project. GTPC fully accepts all financial responsibility for construction of the industrial wastewater treatment plant prior to issuance of a TPDES permit. GTPC also acknowledges that issuance of an approval to construct does not authorize the discharge of any wastewater to waters in the state.

GTPC is very proud of the Project and the economic impact that it will have on southeast Texas communities. The GTPP will include three new manufacturing units, including a 2,080 kilotons per annum (KTA) ethane cracker and two 1,000 KTA high-density polyethylene (PE) units. The total installed cost of the GTPP is expected to be \$8.5 billion and the Project is expected to generate an estimated \$50 billion for the Orange County area in economic output over the next twenty (20) years during construction and operation. The GTPP will provide approximately 4,500 construction jobs and more than 500 full-time jobs. As of the end of May 2023, GTPC has already spent nearly \$53 million in Orange County, including \$17.6 million on local companies for contracted work. See attached article from the *Orange Leader* newspaper.

As described in more detail in the TPDES application, the need for treatment of Project wastewaters will occur in three phases. The two PE units will be commissioned first. During that phase, wastewater that will be directed to the wastewater treatment system will be commissioning wastewater for the PE units (water flush, passivation and hydrotest water) and wastewater associated with treatment facility startup. During the second phase of the Project, the two PE units will be in operation and commissioning of the Ethane Cracker will occur. During that phase, wastewater directed to the wastewater treatment system will consist of process wastewaters, including first-flush stormwater, and utility wastewaters from the operating PE units and commissioning wastewaters associated with the Ethane Cracker. In the final phase, both PE units and the Ethane Cracker will be in operation and wastewater directed to the wastewater treatment system will consist of process wastewaters, including first flush process area stormwater,

and utility wastewaters from the three manufacturing units. The final phase daily average flow is proposed to be 5.2 million gallons per day.

The reasons that GTPC needs approval to construct the wastewater treatment facility by October 1, 2023, likely before a decision is made on the permit application include:

- Thousands of construction workers and multiple teams will be working on the Project. A delay in construction of the wastewater treatment plant will disrupt the progress and negatively impact the schedules for many of the skilled trades and the overall construction at the site. The wastewater treatment facility will be centrally located within the site and delays to construction of this facility can complicate mobilization of the wastewater treatment facility equipment to the construction area.
- The production facility startup is dependent on construction of the wastewater treatment facility.
 - Excavations are scheduled to begin in October 2023 and equipment foundations work in February 2024. Equipment for the wastewater treatment facility is scheduled to be installed beginning in September 2024. Mechanical installation completion is scheduled for August 2025 and pre-commission is scheduled to be completed in September 2025.
 - The wastewater treatment facility will be ready to start in December 2025.
 - The first polyethylene (PE) process units are scheduled to be on-line in July 2026.
 - The wastewater generated at the PE unit will be processed through the wastewater treatment facility prior to being discharged under TPDES permit.
- GTPC has evaluated other scenarios regarding management of wastewater an on-site pretreatment will be necessary even if GTPC considers off-site disposal of wastewater at a publicly owned treatment works.
- The approval to construct is necessary for construction, and timely startup, and operation of the production facility. Without this approval, the production facility startup could be delayed for months while the wastewater treatment facility is being constructed. Completion of the construction work and timely startup of production operations are extremely important to enable timely investments in the local community and beyond, in terms of direct and indirect project support via employment and procurement.

Finalization of GTPC's submittal of the application for a TPDES permit has been challenging due in part to complications in determining the optimal location for discharge of the treated effluent. A significant complicating factor has been that Adams and Cow Bayous are the most logical receiving streams for the discharge of industrial wastewater from the Project. As the TCEQ is aware, technical uncertainties and concerns with accuracy of the existing total maximum daily loads for Adams and Cow Bayous continue. Those issues have caused the TCEQ to halt, for an indefinite period, processing of applications to discharge wastewater to these waterbodies. As a result, GTPC has researched many different alternative receiving waters and locations. GTPC has now determined that the discharge location for the Project will be via pipeline directly to the Sabine River in Tidal Segment No. 501.

The wastewater treatment plant is designed and will be constructed to meet the anticipated 40 CFR Part 414 technology-based effluent limitations applicable to Organic Chemical, Plastics, and

Synthetic Fiber manufacturers and a conservative assessment of the anticipated water quality-based limitations for a discharge to Tidal Segment No. 501.

GTPC is not aware of negative community sentiment or local environmental concerns related to operation of the petrochemical manufacturing facility. As shown in the attached articles, the Project is already providing positive impact in the community, particularly related to education, environment, and employment.

CERTIFICATION

I certify that I understand that approval to construct is not a permit to operate and does not guarantee that this facility will receive a permit. I understand that, during the application review, public comment, review by EPA or other state and federal agencies, and contested case hearing process, effluent limitations and/or permit requirements may become stricter than anticipated, necessitating design changes at this facility. I also understand that the permit as issued, may require a different location for wastewater facilities, a different location for the point of discharge or may prohibit discharge entirely, requiring a different disposal method.

I certify under penalty of law that this document was prepared under my direction and or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

GOLDEN TRIANGLE POLYMERS COMPANY LLC



Steve Wardle
President

Date: 6-28-2023

LOCAL NEWS

Golden Triangle Polymers presents \$1.3M check to Lamar State College Orange at groundbreaking ceremony

The check was donated to help facilitate the purchase of a Polaris Hands-on-Training 3 Glycol Distillation Trainer, where LSCO Industrial Systems students can train.



Author: Lupita Villarreal

Published: 5:15 PM CST March 7, 2023

Updated: 10:08 PM CST March 7, 2023



ORANGE, Texas — The Golden Triangle Polymers Company presented a check to Lamar State College Orange at a groundbreaking event in Orange Tuesday.

The groundbreaking ceremony was for an \$8.5 billion polymers plant that is expected to bring more than 500 full-time jobs to Orange County.

A \$1.3 million check was donated to help facilitate the purchase of a Polaris Hands-on-Training 3 Glycol Distillation Trainer, where LSCO Industrial Systems students can train, according to a news release from Lamar State College Orange.

The unit will be 24-feet long, 35-feet high and 11-feet wide and will include differential pressure transmitters, temperature transmitters and industrial process instruments.

LSCO President Dr. Thomas Johnson says they couldn't be more grateful for the donation and continued support from the Golden Triangle Polymers Company.

"Golden Triangle Polymers Company's new world-class polymers plant represents an investment in the future generations of residents of Orange, Orange County, and the entire Southeast Texas area as well as Southwest Louisiana," said Johnson.

LSCO Industrial Systems Program Director Cheryl January says Golden Triangle Polymers Company understands the important role an educated workforce plays in the success of a global operation.

"We are incredibly grateful and proud to be the recipient of this enormously generous gift to our college and to our current and future students," said January.

RELATED: Golden Triangle Polymers plant holds groundbreaking Tuesday afternoon in Orange County

The new Golden Triangle Polymers Company plant near the Orange County Airport along Texas Highway 87 in Orange is a joint venture between Chevron Phillips Chemical and Qatar Energy. Chevron Phillips holds a 51% share of the plant.

Construction has already begun on the project, which the company says will create 4,500 construction jobs as well as 500 full-time jobs once the plant begins operations, according to a news release from Chevron Phillips.

The plant, which will produce Marlex polyethylene, is expected to begin operating in 2026.

The plant is "expected to contribute \$50 billion in residual economic impacts for the community" over the next 20 years, according to the release.

The Record Newspapers - Hometown News For Orange County, Texas

New plant has already spent \$53 million here

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30JUN '23 14:37

By Margaret Toal
For the Record

Orange County Commissioners Court honored local Salvation Army Captains Frankie and Jan Zuniga with a special plaque and proclamation thanking them for their work here, especially during disasters like hurricanes, tornadoes, and freezes. The Zunigas transferred to the Orange County Salvation Army weeks before Hurricane Harvey in late August 2017. They are being transferred to McAllen, Texas.

The new Golden Triangle Polymers plant has already spent nearly \$53 million in Orange County and has spent \$17.6 million on local companies for contracted work.

Officials from Chevron Phillips, owner of the \$8.5 billion plant site being readied for construction, gave the figures in their first quarterly report to Orange County Commissioners Court Monday.

However, even though commissioners were pleased at the industrial news, the meeting had a touch of sadness. Commissioners Court said goodbye to the Orange County Salvation Army Captains Frankie and Jan Zuniga. The couple has been transferred to McAllen, Texas.

The court issued a proclamation in tribute to the couple and presented them with a plaque of appreciation for their local work. No other local Salvation Army captain in recent memory has received such a tribute.

The Zunigas moved to Orange with their two young daughters in the summer of 2017, weeks before Hurricane Harvey flooded most of the county and left hundreds homeless. The Zunigas, veterans of Salvation Army life, had never overseen such a disaster.

Since then, the county has experienced more hurricanes and even two tornadoes. Through each disaster, the Zunigas and the local Salvation Army have assisted in helping families and individuals.

Commissioners and County Judge John Gothia praised them for their work. "We have certainly together have gotten through trials and tribulations," during the past six years, he said. "You served Orange County extremely well."

Frankie Zuniga said the plaque belongs "to all the people in the background supporting us." He praised the local army's staff and volunteers.

Jan Zuniga said "Orange County has been very much a part of our lives." The family has relatives in Florida and when they travel from McAllen there, they will be sure to stop in Orange for their favorite things, mentioning the Blue Bird Fish Camp hamburgers.

"We thank you for taking us in and allowing us to be part of your family," she told commissioners.

During the Chevron Phillips presentation on Golden Triangle Polymers, Heather Betancourth from the corporation gave a financial and jobs report for the first quarter of the 2023. The report is the first, and the quarterly reports are required as part of the tax abatement deal with the county.

She said they included figures from the last quarter of 2022, though work at the 2,000 acre site started before the company made the final announcement in October that the plant would be built here.

At the end of 2022, the company had spent \$32 million. In the first quarter this year, the company has spend close to \$21 million. In addition, the company reports expenditures of nearly \$527,000 on "small credit card purchases" like caterers bringing meals to the site.

Individuals looking for jobs should contact Texas Workforce Solutions, where they will be assessed for their skills and experience. Some have been referred for extra training. Chevron Phillips has also worked with LSCO and public schools to assist with needed training.

Vendors and contractors must also go through a company process to be approved to submit bids. Once they are approved, they will be able to bid on items and services needed. The Local First website will give instructions.

Judge Gothia mentioned that part of the county's agreement with the company included giving local workers, contractors, and small vendors chances to bid on projects and purchases.

Betancourth said the corporation's Local First program was set up for Orange County. It is a joint project including the county, Texas Workforce Solutions, and Lamar State College Orange to get county residents jobs, sales, and contracts with the company.

A couple of Job Fairs have already been held and another one is set June 24 at the Orange County Expo Center on FM 1442. Individuals, vendors, and contractors will be able to get information on how to get jobs or business for the new plant.

Betancourth said "local" is described as people living in Orange, Jefferson, Newton, Jasper, Hardin, Tyler, and Chambers County, along with the Bolivar Peninsula area of Galveston County.

Other business included the court unanimously passing a resolution in support of the new countywide voting center system, first implemented earlier this month. Elections Administrator Donna Alford said the election went well and the resolution will be sent to the Texas secretary of state.

The secretary of state's office gives final approval to conducting the countywide polling place system and the resolution is part of that process.

Judge Gothia said no one knows the status of possible state legislation to disband the central voting system in the state. The Texas Senate approved a bill to eliminate the system, but it must also be approved by the state house of representatives and the governor. Only days are left in the current legislative session.

The court also approved an agreement with the Texas Department of Transportation to repair three small bridges considered in "poor" condition. The bridges are at Sandy Creek on South Burton Road, Anderson Gulley at Terry Road, and Caney Creek at North Tram Road.

TxDOT is using federal Highway Bridge Relacement and Rehabilitation money for the repairs. The county will have to pay for any right-of-way land needed or to move any utilities. Precinct 4 Commissioner Robert Viator

said he has learned those kind of TxDOT projects are worth the amount of money the county might need to pay.

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Golden Triangle Polymers outlines \$30M in road improvements for Orange County

Published 3:52 pm Wednesday, May 24, 2023

By **Staff Reports** (<https://www.orangeleader.com/author/bni-2/>)



Traffic cones help direct traffic into Golden Triangle Polymers at one of the State Highway 87 entryways. (Stephen Hemelt/The Leader)

Work has begun on several major roads near the construction site of the Golden Triangle Polymers facility in Orange.

The progress follows an agreement struck by Golden Triangle Polymers earlier this year with Texas Department of Transportation to pay for and improve the roads.

Golden Triangle Polymers Company is a joint venture between Chevron Phillips Chemical and QatarEnergy. The company is building an \$8.5 billion integrated polymers facility that is expected to be complete by 2026.



(<https://www.orangeleader.com/wp-content/uploads/sites/42/2023/05/web-gtp1.jpg>)

A vehicle passes by construction along State Highway 87 in Orange County associated with the building of the Golden Triangle Polymers plant. (Stephen Hemelt/The Leader)

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The purpose of the road work, company officials said, is to prepare for a series of over-sized, heavy equipment traveling along State Highway 87 from Cow Bayou to the project site, as well as to improve the overall flow of traffic during construction.

The temporary construction workforce supporting this project is estimated to peak at 4,500 in 2024 and 2025. However, company officials stress, road improvements have been engineered to accommodate a 7,000-person work force.

The road improvements are valued at \$30 million, according to Golden Triangle Polymers, and are being funded by the company. Golden Triangle Polymers is paying for and performing the work, but the road is still be owned and maintained by the State of Texas.



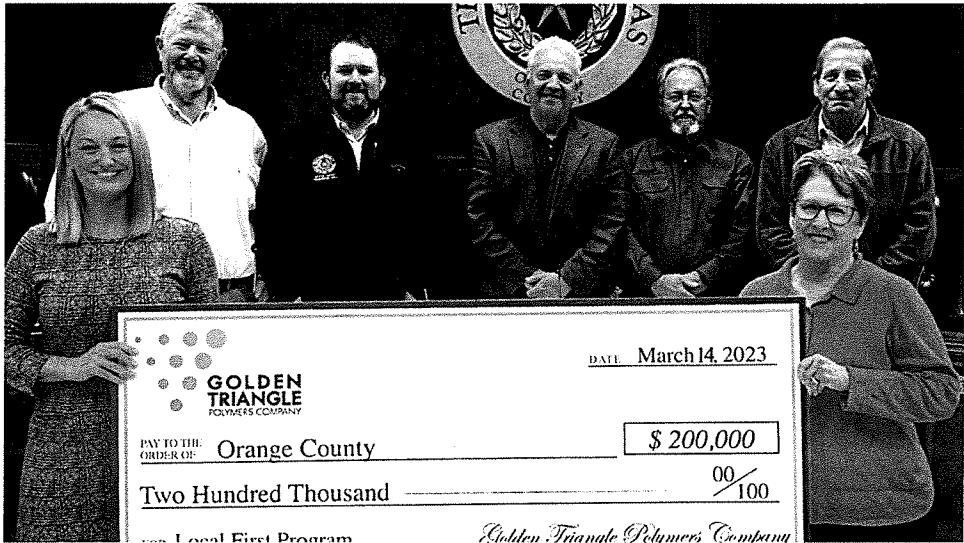
Concrete barriers and orange barrels can already be seen dotting the highway from Bridge City to West Orange. Information on the company website says the public can expect the roadwork to last until later this year.

TCED OCC
30 JUN '23 14:37

POWER CITY

Golden Triangle Polymers Company LLC makes \$400K in donations to help create program that prioritizes hiring locally

The Golden Triangle Polymers Project is expected to bring more than 500 full-time jobs and about 4,500 construction jobs to the area.



Credit: Golden Triangle Polymers Company LLC

Author: Tiana Johnson (KBMT)
Published: 8:32 PM CDT March 14, 2023
Updated: 8:32 PM CDT March 14, 2023



ORANGE COUNTY, Texas — A major project is expected to bring thousands of jobs to the Golden Triangle and those over it are helping to ensure area residents are prioritized come hiring.

Golden Triangle Polymers Company LLC, a joint venture owned by Chevron Phillips Chemical and an indirect subsidiary of QatarEnergy, has made \$400,000 in donations to help support Local First. The company is collaborating with Orange County and Workforce Solutions Southeast Texas.

Related: Chevron Phillips \$8.5B plant expansion could impact housing market in Orange County

Local First is a program that prioritizes hiring locally to fill jobs at new businesses and manufacturing facilities such as the Golden Triangle Polymers plant.

The Golden Triangle Polymers Project is under construction in Orange County and is set to be a world-class integrated polymers facility. The project is expected to bring more than 500 full-time jobs and about 4,500 construction jobs to the area.

It is also expected to generate an estimated \$50 billion for the community in residual economic impacts over 20 years.

Chevron Phillips Chemical is managing engineering, procurement and construction for the project and will operate the facility after start-up, according to the release. Local First will help workers and businesses throughout the Golden triangle to compete for opportunities through public communications, public fairs and information sessions, and resource referrals.

"Hiring local talent and supporting businesses in the area is important to Golden Triangle Polymers," David Godard, project director for the Golden Triangle Polymers Project, said.

"We're excited about the community collaborations we've developed to promote and manage Local First over the next four years,"

The company first donated \$200,000 to Orange County to expand its economic development program to include the Golden Triangle Polymers Project.

"Orange County has a long history of supporting business growth, and the Local First program will help us continue to do that," Orange County Judge John Gothia said. "We look forward to this collaboration and hope it will help our local small-business community be competitive when bidding for work on the project."

The company then made a second \$200,000 donation to Workforce Solutions Southeast Texas to expand workforce development efforts in the Golden Triangle region.

Workforce Solutions created an online job database that includes available jobs from the project and a list of the primary companies carrying out engineering, procurement and construction work.

"The job portal we created is a one-stop-shop solution for people interested in working on the project. It's much easier to go to one website than seven different websites to find work," Mary Hammon, executive director of Workforce Solutions Southeast Texas, said. "This collaboration will allow Workforce Solutions to stay true to its mission to help job seekers put their best foot forward when competing for work."

Workforce Solutions Southeast Texas has a storefront that is located at 2415 N 16th Street. in Orange. Job seekers can go to the storefront for basic screening, online application assistance and referral to area education institutions if additional training or certification is needed.

As part of the Local First program, Workforce Solutions Southeast Texas will also host job fairs that are free and open to the public.

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