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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 27, 2024

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
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RE: **IN THE MATTER OF THE APPLICATION BY CORPUS CHRISTI
POLYMERS LLC FOR TPDES PERMIT NO. WQ0005019000
TCEQ DOCKET NO. 2024-1227-IWD**

Dear Ms. Gharis:

Enclosed for filing is the Office of Public Interest Counsel's Response to Requests for Hearing and Requests for Reconsideration in the above-entitled matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Sheldon P. Wayne".

Sheldon P. Wayne, Attorney
Assistant Public Interest Counsel

cc: Mailing List

DOCKET NO. 2024-1227-IWD

APPLICATION BY	§	BEFORE THE
CORPUS CHRISTI	§	
POLYMERS, LLC	§	TEXAS COMMISSION ON
FOR TPDES PERMIT	§	
NO. WQ0005019000	§	ENVIRONMENTAL QUALITY

OFFICE OF PUBLIC INTEREST COUNSEL'S
RESPONSE TO REQUESTS FOR HEARING AND
REQUESTS FOR RECONSIDERATION

To the Members of the Texas Commission on Environmental Quality:

The Office of Public Interest Counsel (OPIC) at the Texas Commission on Environmental Quality (TCEQ) files this response to the hearing requests and requests for reconsideration received in the above-captioned matter.

I. Introduction

A. Summary of Position

Before the Commission is the application of Corpus Christi Polymers, LLC for renewal of Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0005019000. The Commission received comments and requests for a contested case hearing from the following organizations: For the Greater Good, Texas Campaign for the Environment, Coastal Alliance to Protect our Environment, and Hillcrest Residents Association. The Commission also received comments and requests for a contested case hearing from the following individuals: Elida Castillo, Margaret Duran, George Gardiner, Brandon Marks, Blanca Parkinson, Love Sanchez, and Chloe Torres. Finally, the Commission received requests for reconsideration from: For the Greater Good, Texas

Campaign for the Environment, Jennifer Hilliard, Tammy King, and Joanie Steinhaus.

For the reasons stated herein, OPIC respectfully recommends the Commission find there is no right to a contested case hearing in this matter and therefore deny all hearing requests. OPIC further recommends the Commission deny the pending requests for reconsideration. However, OPIC finds that the public interest in this case warrants a hearing, and we respectfully recommend that the Commission exercise its authority to grant a hearing in the public interest.

B. Description of Application and Facility

Corpus Christi Polymers, LLC (Applicant) applied to the TCEQ for a renewal of its TPDES permit no. WQ0005019000 to authorize the addition of process wastewater to Outfall 001. Applicant proposes to operate the Corpus Christi Polymers Plant, a plastic resins manufacturing facility, which is not currently in operation. The draft permit authorizes the discharge of reverse osmosis reject water, filter backwash, previously monitored effluents [process wastewater, utility wastewater, fire system (testing and flushing) water, and stormwater from Internal Outfall 101; and treated domestic wastewater from Internal Outfall 201], fire system (testing and flushing) water, utility wastewaters, and stormwater at a daily average flow not to exceed 38,500,000 gallons per day via Outfall 001.

The Facility is located at 7001 Joe Fulton International Trade Corridor, in the City of Corpus Christi, Nueces County 78409. The effluent will be discharged directly to Corpus Christi Inner Harbor Segment No. 2484 of the Bays and

Estuaries. The designated uses for Segment No. 2484 are non-contact recreation and intermediate aquatic life use.

C. Procedural Background

The TCEQ received the application on December 1, 2021, and declared it administratively complete on February 10, 2022. On February 22, 2022, the Notice of Receipt and Intent to Obtain a Water Quality Permit was published in English in the *Corpus Christi Caller Times* and in Spanish in *La Prensa Comunidad*. The Executive Director (ED) completed the technical review of the application on March 11, 2022, and prepared a draft permit. On August 16, 2022, the Notice of Application and Preliminary Decision was published in English in the *Corpus Christi Caller Times* and in Spanish in *La Prensa Comunidad*. On September 20, 2022, the draft permit package was sent to EPA for review. EPA lodged an interim objection on November 18, 2022. Based on discussions with EPA, the revised draft permit now includes monitoring requirements for total dissolved solids, chloride, and sulfate, as well as a condition requiring Corpus Christi Polymers to submit semi-annually effluent salinity and flow data to TCEQ for review (with a copy to the EPA) once discharge commences. EPA withdrew its interim objection on December 28, 2023. Notice of a public meeting was published in English on January 22, 2023, in the *Corpus Christi Caller Times*, and in Spanish on January 24, 2023, in *La Prensa Comunidad*. A public meeting was held in Corpus Christi on February 23, 2023, and the comment period ended at the close of the public meeting. The ED's Response to Comments was mailed June

5, 2024, and the deadline to submit contested case hearing requests and requests for reconsideration was July 8, 2024.

II. Applicable Law

A. Request for Contested Case Hearing

This application was filed on or after September 1, 2015, and is therefore subject to Senate Bill 709, Tex. S.B. 709, 84th Leg., R.S. (2015) (SB 709). For SB 709 applications, Texas Water Code (TWC) Section 5.115(a)(a-1)(2)(B) provides the Commission may not find that a hearing requestor is an affected person unless the hearing requestor timely submitted comments on the application. Texas Government Code Section 2003.047(e-1) further provides that each issue referred by the Commission must have been raised by an affected person in a timely comment filed by that affected person. The Commission's Chapter 55 rules implement these statutory requirements and other provisions of SB 709.

Under Title 30, Texas Administrative Code (TAC) § 55.201(c), a hearing request by an affected person must be in writing, must be timely filed, may not be based on an issue raised solely in a public comment which has been withdrawn, and, for applications filed on or after September 1, 2015, must be based only on the affected person's timely comments.

Section 55.201(d) states that a hearing request must substantially comply with the following:

- (1) give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining

in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;

- (3) request a contested case hearing;
- (4) for applications filed on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the Commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, and list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.

Under 30 TAC § 55.203(a), an "affected person" is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest. Section 55.203(c) provides relevant factors to be considered in determining whether a person is affected. These factors include:

- (1) whether the interest claimed is one protected by the law under which the application will be considered;
- (2) distance restrictions or other limitations imposed by law on the affected interest;
- (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
- (4) likely impact of the regulated activity on the health, safety, and use of property of the person;

- (5) likely impact of the regulated activity on use of the impacted natural resource by the person;
- (6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application that were not withdrawn; and
- (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

Under § 55.203(d), to determine whether a person is an affected person for the purpose of granting a hearing request for an application filed on or after September 1, 2015, the Commission may also consider the following:

- (1) the merits of the underlying application and supporting documentation in the administrative record, including whether the application meets the requirements for permit issuance;
- (2) the analysis and opinions of the ED; and
- (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.

For applications filed on or after September 1, 2015, § 55.205(b) states that a hearing request by a group or association may not be granted unless all of the following requirements are met:

- (1) comments on the application are timely submitted by the group or association;
- (2) the request identifies, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right;
- (3) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (4) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

For an application filed on or after September 1, 2015, § 55.211(c)(2)(A)(ii) provides that a hearing request made by an affected person shall be granted if the request raises disputed issues of fact that were raised by the affected person during the comment period, that were not withdrawn by filing a withdrawal letter with the Chief Clerk prior to the filing of the ED's RTC, and that are relevant and material to the Commission's decision on the application.

Under § 55.211(c)(2)(B)–(D), the hearing request, to be granted, must also be timely filed with the Chief Clerk, pursuant to a right to hearing authorized by law, and comply with the requirements of § 55.201.

B. Request for Reconsideration

Any person may file a request for reconsideration (RFR) of the ED's decision under 30 TAC § 55.201(e). The request must be in writing and filed with the Chief Clerk no later than 30 days after the Chief Clerk mails the ED's decision and RTC. The request must expressly state that the person is requesting reconsideration of the ED's decision and give reasons why the decision should be reconsidered.

III. Discussion

A. Right to Hearing

As a threshold matter, TWC § 26.028(d) states that the Commission may approve an application to renew a permit without a public hearing under certain conditions. *See also* 30 TAC §§ 50.113(d)(4), 55.211(d)(4). Commission Rule 55.201(i)(5) provides that no right to a hearing exists for certain water quality

discharge permits. These authorizations include applications to renew or amend a permit if:

- (A) the applicant is not applying to increase significantly the quantity of waste to be discharged or change materially the pattern or place of discharge;
- (B) the activity to be authorized by the renewal or amended permit will maintain or improve the quality of waste authorized to be discharged;
- (C) any required opportunity for public meeting has been given;
- (D) consultation and response to all timely received and significant public comment has been given; and
- (E) the applicant's compliance history for the previous five years raises no issues regarding the applicant's ability to comply with a material term of the permit.

30 TAC § 55.201(i)(5); *see* TWC § 26.028(d).

Applying these requirements to the application under consideration, first, while the draft permit proposes to authorize the addition of process wastewater to Outfall 001, it does not significantly increase the quantity of waste that could be discharged from the existing permit. Second, the draft permit is more stringent than the existing permit, as it now includes monitoring requirements for total dissolved solids, chloride, and sulfate, and additionally, requires Applicant to submit semi-annually effluent salinity and flow data to TCEQ (and provide a copy to EPA) for review once discharge commences. Third, the public was provided notice of its right to request a public meeting on this application, and a public meeting was held on February 23, 2023. Fourth, the ED has filed a response to comments that addresses all timely and significant public comments. Finally, Applicant's compliance history for the five-year period prior to the date

the permit application was received by the ED raises no issues regarding Applicant's ability to comply with a material term of the permit. As explained in the ED's RTC, a compliance history was run for both Corpus Christi Polymers, LLC and the Corpus Christi Polymer Plant during the permitting process, and both have no history of past violations.

In sum, OPIC finds that because each requirement contained in 30 TAC § 55.201(i)(5) has been satisfied, no right to a contested case hearing exists in this case.

B. Environmental Burdens on Nearby Communities

Requestors raise concerns regarding nearby communities that have been historically overburdened by pollution and negative environmental impacts. They note that these communities are predominately minority and low income.

Because the TCEQ receives federal funding, it must comply with a suite of federal guidance and laws ensuring its actions are not intentionally discriminatory and will not have discriminatory effects.¹ For instance, Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin.² Executive Order 12898 addresses the environmental and human health conditions of minority communities and low-income communities and calls on agencies to identify and address any disproportionately high and adverse human health or environmental effects of their programs.³ Executive Order 13166 requires federal agencies—and recipients of federal financial

¹ See 40 CFR §7.35(b). <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-A/part-7>

² <https://www.justice.gov/crt/fcs/TitleVI>

³ <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>

assistance—to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so limited English proficiency persons can have meaningful access to them.⁴

TCEQ has made a commitment to preventing discriminatory actions or effects through its Title VI Compliance efforts, which are intended to ensure reasonable access to its decision-making processes. Towards this end, efforts have been made to develop and implement a Disability Nondiscrimination Plan, Public Participation Plan, and Language Access Plan.⁵ Together, these efforts are intended to provide equal access to Commission programs and activities.

C. Requests for Reconsideration

The Commission received timely filed requests for reconsideration of the ED's decision from For the Greater Good, Texas Campaign for the Environment, Jennifer Hilliard, Tammy King, and Joanie Steinhaus. They ask for reconsideration on the basis that the application and draft permit do not comply with cooling water intake structure requirements, and that the discharge will cause negative aquatic impacts and worsen environmental burdens on frontline communities. They also note that the Applicant was not required to provide dispersion modeling of the discharge, the discharge does not require a diffuser, and that the Facility was erroneously classified as a minor facility.

⁴ <https://www.govinfo.gov/content/pkg/FR-2000-08-16/pdf/00-20938.pdf>

⁵ More information on TCEQ's Title VI Compliance efforts can be found at: <https://www.tceq.texas.gov/agency/decisions/participation/title-vi-compliance>

To the extent that these issues are addressable under TCEQ's rules and state and federal statutes, an evidentiary record would be necessary for OPIC to adequately evaluate these concerns and make a recommendation to the Commission as to whether the ED's decision should be reconsidered on these grounds. At this time, an evidentiary record does not exist, and therefore, OPIC cannot recommend that the requests for reconsideration be granted. Thus, OPIC respectfully recommends that the Commission deny the pending requests for reconsideration.

D. Public Interest Hearing

Both For the Greater Good and Texas Campaign for the Environment argue that in spite of the prohibition contained in 30 TAC § 55.201(i)(5), the Commission has authority to hold a hearing in this matter if it determines that a hearing would be in the public interest. *See* 30 TAC § 55.211(d)(1). Further authority is found in the Texas Water Code, which provides that on the motion of a Commissioner, the Commission shall hold a public hearing on a permit renewal. TWC § 26.028(c).

After examination, OPIC finds that several reasons weigh in favor of holding a hearing in the public interest. First, the Facility will be located adjacent to, and discharge into, the Corpus Christi Bay. There are several other seawater desalination projects that are currently being pursued in the area, including projects by the Port of Corpus Christi Authority and the City of Corpus Christi. The cumulative effects of these projects do not appear to have been considered during the permit renewal for Corpus Christi Polymers, and modeling of the

discharge's effects on salinity within the waterbody is similarly absent from the permit renewal. Additionally, the public has demonstrated significant interest in this matter, as almost 300 comments have been received to date. A substantial number of hearing requests, including requests from local grassroots organizations, have also been received, and the ED determined that the degree of public interest was significant enough to hold a public meeting. Further, the Bay itself is an important and valuable shared natural resource. It is frequented by the general public for recreational purposes, and it also supports tourism and fishing industries. Finally, For the Greater Good and Texas Campaign for the Environment argue, and OPIC agrees, that a hearing would result in a more robust record at the Commission level, providing the Commissioners with all of the information that they need to make a fully informed decision on the permit renewal.

E. Maximum Expected Duration for the Contested Case Hearing

Commission rule 30 TAC § 50.115(d) requires that any Commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides that, for applications filed on or after September 1, 2015, the administrative law judge must conclude the hearing and provide a proposal for decision by the 180th day after the first day of the preliminary hearing, or a date specified by the Commission, whichever is earlier. 30 TAC § 50.115(d)(2). To assist in setting a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC § 55.209(e)(7), OPIC estimates

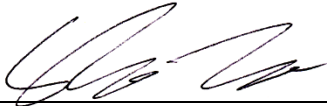
that the maximum expected duration of a hearing on this Application would be 180 days from the first date of the preliminary hearing until the proposal for decision is issued.

IV. Conclusion

Having found that, as a matter of law, no right to hearing exists in this matter, OPIC respectfully recommends the Commission deny the pending hearing requests. We also recommend that the requests for reconsideration be denied. However, OPIC finds that the public interest in this case does warrant a hearing, and we respectfully recommend that the Commission exercise its authority to grant a hearing in the public interest.

Respectfully submitted,

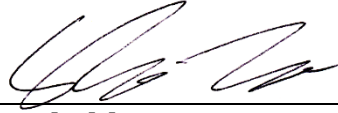
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CERTIFICATE OF SERVICE

I hereby certify that September 27, 2024, the Office of Public Interest Counsel's Response to Requests for Hearing and Requests for Reconsideration was filed with the Chief Clerk of the TCEQ and a copy was served on all persons listed on the attached mailing list via electronic mail, and/or by deposit in the U.S. Mail.



Sheldon P. Wayne

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TCEQ DOCKET NO. 2024-1227-IWD

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