

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 15, 2025

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087, MC 105
Austin, Texas 78711-3087

**Re: Application by Golden Triangle Polymers Company, LLC, for New TPDES
Permit No. WQ0005432000; TCEQ Docket No. 2025-1049-IWD**

Dear Ms. Gharis,

I have enclosed for filing the "Executive Director's Response to Hearing Requests."
Please let me know if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Fernando Salazar Martinez", written over a light blue rectangular background.

Fernando Salazar Martinez,
Staff Attorney
Environmental Law Division
Office of Legal Services
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Email: fernando.martinez@tceq.texas.gov
Phone: (512) 239-3356

Enclosure

CC: Mailing List

TCEQ DOCKET NO. 2025-1049-IWD

**APPLICATION OF GOLDEN
TRIANGLE POLYMERS COMPANY,
LLC FOR NEW TPDES PERMIT
NO. WQ0005432000**

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**BEFORE THE
TEXAS COMMISSION
ON
ENVIRONMENTAL QUALITY**

EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS

I. INTRODUCTION

The Executive Director (ED) of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Hearing Requests on the application of Golden Triangle Polymers Company, LLC (Applicant) for a new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0005432000 to authorize the discharge of utility wastewater and stormwater on an intermittent and flow-variable basis via Outfall 001 (Phase 1); process wastewater, utility wastewater, and stormwater at a daily average flow not to exceed 2,650,000 gallons per day via Outfall 001 (Phase 2); and process wastewater, utility wastewater, and stormwater at a daily average flow not to exceed 5,150,000 gallons per day via Outfall 001 (Phase 3).¹

The Office of the Chief Clerk received a timely request for a contested case hearing and request for reconsideration from Mr. Jonathan Webster.

The Executive Director recommends that the Commission find that Mr. Jonathan Webster is not an affected persons and deny his hearing requests. Attached for Commission consideration is a satellite map of the area showing the location of the proposed facility and discharge route.

II. PROJECT OVERVIEW

On June 29, 2023, Golden Triangle Polymers Company, LLC submitted an application for a new permit, TPDES Permit No. WQ0005432000, for proposed discharges from a proposed facility that has not commenced production operations. The proposed wastewater treatment system will be located at 850 Foreman Road, southwest of the City of Orange, Orange County, Texas 77630.² If the Draft Permit is

¹ Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, Appendix A (*Calculated Technology-based Effluent Limits*), at 9-10 (Apr. 17, 2025).

² The proposed wastewater treatment system has not been constructed and will be part of the Applicant's new, larger facility located at 850 Foreman Road. *See* Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, *Project Description and Location*, at 1-2; *Whole Effluent Toxicity Testing (Biomonitoring)*, at 5.

issued, the effluent will be discharged directly to the Sabine River Tidal in Segment No. 0501 of the Sabine River Basin. The designated uses for Segment No. 0501 are primary contact recreation and high aquatic life use.

Proposed Wastewater Treatment System, Treatment Units, and Draft Permit

The Applicant proposes to operate the Golden Triangle Polymers Plant, an integrated polymers production facility consisting of multiple independent petrochemical units including an ethane cracker and two high density polyethylene units.³ The ethane cracker produces ethylene from ethane feedstock while the polyethylene units produce polyethylene pellets from ethylene feedstock. Railcar loading of polyethylene pellets will occur onsite for transport of pellets to customers.

The Draft Permit is set up into three operational phases.⁴ Phase 1 is identified in the Application as the commissioning phase of the polyethylene units and facility utility systems with no facility production. Phase 2 is identified in the Application as the operational phase of the polyethylene production units and the commissioning phase of the ethane cracker unit. Phase 3 is identified as the operational phase of the polyethylene production units and the operational phase of the ethane cracker unit. The final discharge is via Outfall 001 which consists of a submerged single-port diffuser, located approximately 85 feet from the right (western) shoreline of the Sabine River Tidal with an orientation 45 perpendicular to the ambient river flow.⁵ The port has a diameter of 12 inches (0.3048 m) and is oriented horizontally to the water surface.

Proposed Effluent Limits, Discharge Route, and Antidegradation Review

If the Draft Permit is issued, the treated effluent will be discharged directly to the Sabine River Tidal in Segment No. 0501 of the Sabine River Basin.⁶ The coordinates

³ Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, *Project Description and Location*, at 1-2.

⁴ Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, *Project Description and Location*, at 1-2; *Draft Permit Conditions*, at 3-4; Appendix A (*Calculated Technology-based Effluent Limits*), at 9-10.

⁵ Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, Appendix A (*Calculated Technology-based Effluent Limits*), at 10.

⁶ This permit does not authorize the discharge of domestic wastewater. Executive Director's Statement of Basis/Technical Summary, and Preliminary Decision, *Draft Permit Conditions*, at 3. All domestic wastewater must be disposed of in an approved manner, such as routing to an approved onsite septic tank and drainfield system or to an authorized third party for treatment and disposal. Domestic wastewater generated at the facility will be routed to a third party, Orange County WCID #2, that is authorized to receive, treat, and discharge treated domestic wastewater via TPDES Permit No. WQ0010240001.

of the proposed location of Outfall 001 are provided in the table below:⁷

Outfall	Latitude	Longitude
001	30.063007 N	93.720125 W

Based on model results, effluent limits⁸ of 264 pounds per day (lbs/day) for five-day biochemical oxygen demand (BOD₅) for the Phase 2 (2.65 MGD) flow phase and 528 lbs/day BOD₅ for the Phase 3 (5.15 MGD) flow phase are predicted to be adequate to maintain dissolved oxygen levels above the criterion stipulated by the Standards Implementation Team for the Sabine River Tidal (4.0 mg/L).⁹

The designated uses for Segment No. 0501 are primary contact recreation and high aquatic life use. Segment No. 0501 is currently listed on the State's inventory of impaired and threatened waters, the 2022 Clean Water Act Section 303(d) list.¹⁰ The listings are for elevated bacteria levels in water (recreation use) from the confluence of Sabine Lake upstream to the confluence of Little Cypress Bayou (AUs 0501_01 and 0501_02); and for polychlorinated biphenyls [PCBs] in edible tissue from the confluence of Sabine Lake upstream to Morgans Bluff in Orange County (AUs 0501_01, 0501_02, and 0501_03). The issuance of this permit is not anticipated to cause any additional adverse impact to the receiving waters with respect to the listed impairments.¹¹

In accordance with 30 Tex. Admin. Code § 307.5 and TCEQ's *Procedures to Implement the Texas Surface Water Quality Standards* (June 2010), an antidegradation review of the receiving waters was performed.¹² A Tier 1 antidegradation review has preliminarily determined that existing water quality uses will not be impaired by this

⁷ Phase 1 consists of external Outfall 001 only, Phases 2 and 3 consist of both external Outfall 001 and internal Outfall 101. The discharge via internal Outfall 101 commingles with other previously unmonitored waste streams before final discharge via external Outfall 001. See Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, at 3-4.

⁸ Technology-based effluent limitations are presented in Appendix A, and Water-quality-based effluent limitations are presented in Appendix B. Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, at 9-20, 21-40. These effluent limits are also contained within the Draft Permit. Draft TPDES Permit No. WQ0005432000, at 2-2h, 14-15.

⁹ Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, at 3-4. Effluent limitations are established in the draft permit as summarized in Appendix E of the Executive Director's Statement of Basis/Technical Summary.

¹⁰ Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, *Impaired Water Bodies*, at 2-3.

¹¹ There are no completed Total Maximum Daily Loads for Segment No. 0501. Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, *Completed Total Maximum Daily Loads (TMDLs)*, at 3.

¹² Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, *Antidegradation Review*, at 2.

permit action. Numerical and narrative criteria to protect existing uses will be maintained. A Tier 2 review has preliminarily determined that no significant degradation of water quality is expected in Sabine River Tidal, which has been identified as having high aquatic life uses. Existing uses will be maintained and protected. The preliminary determination can be reexamined and may be modified if new information is received.

Summary of Changes from Application

The Draft Permit includes effluent testing requirements in Other Requirement No. 13 for all phases of Outfall 001, and not just the final phase as anticipated by the Applicant.¹³

III. PROCEDURAL BACKGROUND

The permit application was received on June 29, 2023, declared administratively complete on August 7, 2023. The Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) was published on August 19, 2023, in the *Orange Leader* and on August 17, 2023, in *El Perico*. The combined NORI and Notice of Application and Preliminary Decision (NAPD) was published on May 3, 2025, in the *Orange Leader* and on May 1, 2025, in *El Perico*.

The public comment period for this application ended on June 2, 2025. The Executive Director's Response to Comments was filed on June 9, 2025. The hearing request period for this application ended on July 14, 2025.

This application was filed on or after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill (HB) 801, 76th Legislature (1999), and Senate Bill (SB) 709, 84th Legislature (2015), both implemented by the Commission in its rules in 30 Tex. Admin. Code Chapters 39, 50, and 55. The Texas Legislature enacted Senate Bill 709, effective September 1, 2015, amending the requirements for comments and contested case hearings. This application is subject to those changes in the law.

IV. EVALUATION OF HEARING REQUESTS

HB 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public

¹³ Executive Director's Statement of Basis, Technical Summary, and Preliminary Decision, at 6.

comment and the Commission's consideration of hearing requests. SB 709 revised the requirements for submitting public comment and the Commission's consideration of hearing requests. The evaluation process for hearing requests is discussed below.

A. Response to Requests

The Executive Director, the Public Interest Counsel, and the Applicant may each submit written responses to a hearing request.¹⁴

Responses to hearing requests must specifically address:

- (1) whether the requestor is an affected person;
- (2) whether issues raised in the hearing request are disputed;
- (3) whether the dispute involves questions of fact or law;
- (4) whether the issues were raised during the public comment period;
- (5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter by filing a written withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment;
- (6) whether the issues are relevant and material to the decision on the application; and
- (7) a maximum expected duration for the contested case hearing.¹⁵

B. Hearing Request Requirements

For the Commission to consider a hearing request, the Commission must first determine whether the request meets certain requirements:

A request for a contested case hearing by an affected person must be in writing, filed with the chief clerk within the time provided . . . , based only on the requester's timely comments, and not based on an issue that was raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment.¹⁶

A hearing request must substantially comply with the following:

- (1) give the name, address, telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who is responsible for receiving all official communications and documents for the group;
- (2) identify the person's justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language

¹⁴ 30 Tex. Admin. Code § 55.209(d).

¹⁵ 30 TEX. ADMIN. CODE § 55.209(e).

¹⁶ 30 TEX. ADMIN. CODE § 55.201(c).

the requestor's location and distance relative to the 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 facility or activity in a manner not common to members of the general public;

- (3) request a contested case hearing;
- (4) list all relevant and material disputed issues of fact that were raised 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 comments that the requestor disputes and 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.¹⁷

C. Requirement that Requestor be an Affected Person

To grant a contested case hearing, the Commission must determine that a requestor is an "affected person" by conducting the following analysis:

- (a) For any application, 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 public does not qualify as a personal justiciable interest.
- (b) Governmental entities, including local governments and public agencies with authority under state law over issues raised by the application, may be considered affected persons.
- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
 - (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 and safety of the person, and on the use of property of the person;
 - (5) likely impact of the regulated activity on use of the impacted natural resource by the person; and
 - (6) whether the requester timely submitted comments on the application which were not withdrawn; and
 - (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.
- (d) In making this determination, the commission may also consider, to the extent consistent with case law:

¹⁷ 30 TEX. ADMIN. CODE § 55.201(d).

- (1) the merits of the underlying application and supporting documentation in the commission's 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.¹⁸

Under 30 Tex. Admin. Code § 55.205(a), a group or association may request a contested case hearing only if the group or association meets the following requirements:

- (1) one or more members of the group or association would otherwise have standing to request a hearing in their own right;
- (2) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (3) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.¹⁹

Additionally, for applications filed on or after September 1, 2015, a hearing request by a group or association for a contested case 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.²⁰

D. Referral to the State Office of Administrative Hearings

When the Commission grants a request for a contested case hearing, the Commission shall issue an order specifying the number and scope of the issues to be referred to State Office of Administrative Hearing (SOAH) for a hearing.²¹ The Commission may not refer an issue to SOAH for a contested case hearing unless the commission determines that the issue:

¹⁸ 30 TEX. ADMIN. CODE § 55.203(a)-(d).

¹⁹ 30 TEX. ADMIN. CODE § 55.205(a)(1)-(3)

²⁰ 30 TEX. ADMIN. CODE § 55.205(b)(1)-(4).

²¹ 30 TEX. ADMIN. CODE § 50.115(b).

- (1) involves a disputed question of fact or a mixed question of law and fact;
- (2) was raised during the public comment period by an affected person; and
- (3) is relevant and material to the decision on the application.²²

V. ANALYSIS OF THE HEARING REQUESTS

For this permit application, the public comment period ended on June 2, 2025, and the time for filing Requests for a Hearing or a Request for Reconsideration (RFR) ended on July 14, 2025. The Commission received a timely hearing request and request for reconsideration from Mr. Jonathan Webster on May 9, 2025. The Executive Director's analysis determined whether the Request followed TCEQ rules, if the requestor qualifies as an affected person, what issues may be referred for a possible hearing, and the length of that hearing.

A. Whether the Request complies with 30 Tex. Admin. Code §§ 55.201-205.

1. Persons Not Affected

Requestor No. 1 – Mr. Jonathan Webster

Mr. Jonathan Webster submitted timely comments and a hearing request on May 9, 2025, containing his name, address, and telephone number as required under 30 Tex. Admin. Code § 55.201(d)(1) and (3). The submission also included the permit number as required in the notice and pursuant to 30 Tex. Admin. Code § 55.201(d)(4). Mr. Webster also submitted timely public comments to form the basis of his hearing request pursuant to 30 Tex. Admin. Code § 55.201(c).

In his comments and request, Mr. Webster raised concerns regarding: the antidegradation review failing to account for the cumulative impacts of industrial discharges from the petrochemical sector on both local biodiversity and broader climate resilience; inadequate community engagement; the misalignment with climate justice principles and further entrenchment of fossil fuel-based industrial infrastructure in Texas; and a demand for transparency regarding environmental monitoring data, including past permit violations or known risks associated with Golden Triangle Polymers operations, and a clear explanation of whether these have been incorporated into the Draft Permit's conditions.

²² 30 TEX. ADMIN. CODE § 55.203(d).

Mr. Webster's comments and hearing request were submitted together prior to the end of both the comment and hearing request period; therefore, his request is timely under 30 Tex. Admin. Code § 55.201(a), (c). Mr. Webster's submission contained his name, address, and email address; therefore, his request contained the requisite contact information under 30 Tex. Admin. Code § 55.201(d)(1). Within his submission, Mr. Webster stated that "I request a contested case hearing"; therefore, his statement satisfies the requirement to request a hearing under 30 Tex. Admin. Code § 55.201(d)(3). Mr. Webster's submission also contained comments raising concerns, as described above, that raise relevant and material disputed issues, including environmental impacts and the Executive Director's antidegradation review; therefore, his request complies with the requirements of 30 Tex. Admin. Code § 55.201(d)(4)(B).

However, the only address provided by Mr. Webster is located in Connecticut, which is approximately 1,381 miles from the proposed facility and 1,379 miles from the proposed outfall. Mr. Webster is also not listed on the adjacent landowners list that was provided by the Applicant. Due to his distance from the proposed facility and discharge route, Mr. Webster's proximity does not demonstrate that he will be affected differently than a member of the general public under 30 Tex. Admin. Code § 55.203(c)(2). Finally, Mr. Webster's request did not identify any personal interest he believes would be adversely affected; therefore, his request did not demonstrate how he would personally be affected any differently than a member of the general public under 30 Tex. Admin. Code § 55.203(c)(4). For these reasons, the Executive Director recommends the Commission find that Jonathan Webster is not an affected person.

B. Whether the Issues the Requestor Raised are Referable to the State Office of Administrative Hearings (SOAH).

The Executive Director has analyzed issues raised in accordance with the regulatory criteria. The issues discussed were raised during the public comment period and addressed in the Response to Comments. None of the issues were withdrawn. For applications submitted on or after September 1, 2015, only those issues raised in a timely comment by a requester whose request is granted may be referred.²³

However, because the Executive Director is recommending the Commission find that the sole hearing requestor for this application is not affected person and to deny

²³ TEX. GOVT. CODE § 2003.047(e-1); 30 TEX. ADMIN. CODE § 55.211(c)(2)(A)(ii).

his request, the Executive Director does not recommend referral of any issues to SOAH.

VI. ANALYSIS OF THE REQUESTS FOR RECONSIDERATION

On May 9, 2025, the Chief Clerk received a timely Request for Reconsideration (RFR) from Jonathan Webster. As required by 30 Tex. Admin. Code § 55.201(e), Jonathan Webster gave his request in writing, and provided his name, address, and daytime telephone number. He specifically requested reconsideration of the Executive Director's Preliminary Decision on the Golden Triangle Polymers application.

In his request, Mr. Webster raised issues that are within the Commission's jurisdiction to consider in the context of a TPDES application, including: inadequate community engagement (RTC Response No. 7); and a demand for transparency for environmental monitoring data, including past permit violations or known risks associated with the Golden Triangle Polymers operations, and a clear explanation of whether these have been incorporated into the Draft Permit's conditions (RTC Response No. 3). Mr. Webster also raised the following concerns and issues that are not within the Commission's jurisdiction to consider in the context of reviewing a TPDES application:

- Whether the antidegradation review fails to account for the cumulative impacts of industrial discharges from the petrochemical sector on both local biodiversity and broader climate resilience (RTC Response No. 4). The Executive Director acknowledged and responded to these comments (RTC Response 4). Assessment of climate-related ecological risks cannot be addressed in the review of a wastewater discharge permit, as the scope of the ED's jurisdiction in a TPDES application is limited to the issues set out by statute.
- Whether a review incorporating cumulative and climate-related ecological risks, including increased storm intensity, sea-level rise, and climate-driven shifts in aquatic life viability was required (RTC Comment 4). The Executive Director acknowledged and responded to these comments (RTC Response 4). The Executive Director's jurisdiction in the review of a TPDES application is limited to the issues set out by statute. TCEQ does not have jurisdiction to address climate-related impacts such as increased storm intensity, sea-level rise, and climate-driven shifts in aquatic life viability in the wastewater permitting process. The permitting process is limited to controlling the discharge of pollutants into water in the state and protecting the water quality of the state's rivers, lakes and coastal waters. However, to the extent that an issue related to weather also involves water quality, the Applicant is required to comply with all the numeric and narrative effluent limitations and other conditions in the proposed permit at all times, including during adverse weather conditions.

- Whether the permit facilitates further entrenchment of fossil fuel-based industrial infrastructure in Texas, directly contradicting global, national, and state-level imperatives to transition away from carbon-intensive systems (RTC Comment 6). The Executive Director acknowledged and responded to these comments (RTC Response 6). The permitting process is limited to controlling the discharge of pollutants into water in the state and protecting the water quality of the state's rivers, lakes and coastal waters. These issues and the requested actions are not within the scope of the TPDES permitting process. There are also no state or federal regulations that require an assessment of a project's alignment with a state's long-term sustainability and climate goals.
- Whether issuance of this permit would perpetuate climate injustice by placing the environmental burden on downstream ecosystems and communities while the economic benefits concentrate in corporate hands. He specifically requested a reassessment of the project's alignment with Texas' long-term sustainability and climate goals, including a public analysis of alternatives that prioritize ecological regeneration and community resilience. (RTC Comments 6 and 7). The Executive Director has acknowledged and responded to these comments. (RTC Responses 6 and 7). TCEQ rules in 30 Tex. Admin. Code Ch. 39 also requires that all applications for wastewater discharge permits include mailed and published notice of both the NORI and the NAPD. Lastly, the Applicant provided mailed and published public notices in both English and Spanish, which complies with the applicable notice requirements under 30 Tex. Admin. Code Ch. 39.

Under 30 Tex. Admin. Code § 55.201(e), a request for reconsideration must give reasons why the decision should be reconsidered. The issues raised in Mr. Webster's RFR, to the extent they are within the Commission's jurisdiction to consider on a TPDES application, were considered during the Executive Director's review of the application. Further, Mr. Webster's RFR did not provide any new information that was not considered by the Executive Director during the review of the permit application or that would lead the Executive Director to change her recommendation on the application; therefore, the Executive Director recommends denial of the RFR.

VII. EXECUTIVE DIRECTOR'S RECOMMENDATION

The Executive Director recommends the following actions by the Commission:

1. Find that Mr. Jonathan Webster is not an affected person and deny his hearing request.
2. Deny Mr. Jonathan Webster's Request for Reconsideration.
3. Issue the draft permit as prepared by the Executive Director.

Respectfully submitted,

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Kelly Keel, Executive Director

Phillip Ledbetter, Director
Office of Legal Services

Charmaine Backens, Deputy Director
Environmental Law Division



Fernando Salazar Martinez, Staff Attorney
Environmental Law Division
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REPRESENTING THE EXECUTIVE DIRECTOR
OF THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

VIII. CERTIFICATE OF SERVICE

I certify that on August 15, 2025, the Executive Director's Response to Hearing Requests for TPDES Permit No. WQ0005432000 was filed with the Texas Commission on Environmental Quality's Office of the Chief Clerk, and a copy was served to all persons listed on the attached mailing list via hand delivery, electronic delivery, inter-agency mail, or by deposit in the U.S. Mail.



Fernando Salazar Martinez, Staff Attorney
State Bar No. 24136087

MAILING LIST
Golden Triangle Polymers Company Llc
TCEQ Docket No./TCEQ Expediente N.º 2025-1049-IWD;
Permit No./ Permiso N.º WQ0005432000

FOR THE APPLICANT/PARA EL
SOLICITANTE

Allison Broussard, Environmental
Specialist

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Ava Coleman-Ecter, Environmental
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FOR THE EXECUTIVE DIRECTOR/PARA
LA DIRECTOR EJECUTIVA

via electronic mail/vía correo
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FOR PUBLIC INTEREST COUNSEL/PARA
ABOGADOS DE INTERÉS PÚBLICO

via electronic mail/vía correo
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Garrett T. Arthur, Attorney
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Austin, Texas 78711

FOR ALTERNATIVE DISPUTE
RESOLUTION/PARA LA RESOLUCIÓN
ALTERNATIVA DE DISPUTAS

via electronic mail/vía correo
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Kyle Lucas
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REQUESTER(S)/ SOLICITANTE(S)

Webster, Jonathan
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Attachment A

GOLDEN TRIANGLE POLYMERS COMPANY LLC






WQ0005432000



*Protecting Texas by
Reducing and
Preventing Pollution*

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087
Date: 7/24/2025
CRF 0126623
Cartographer: JStalsby

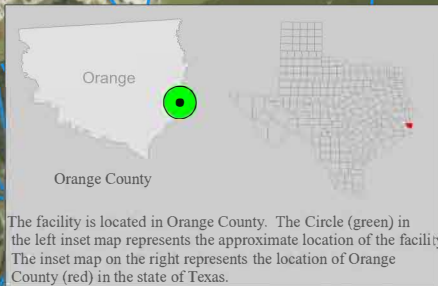
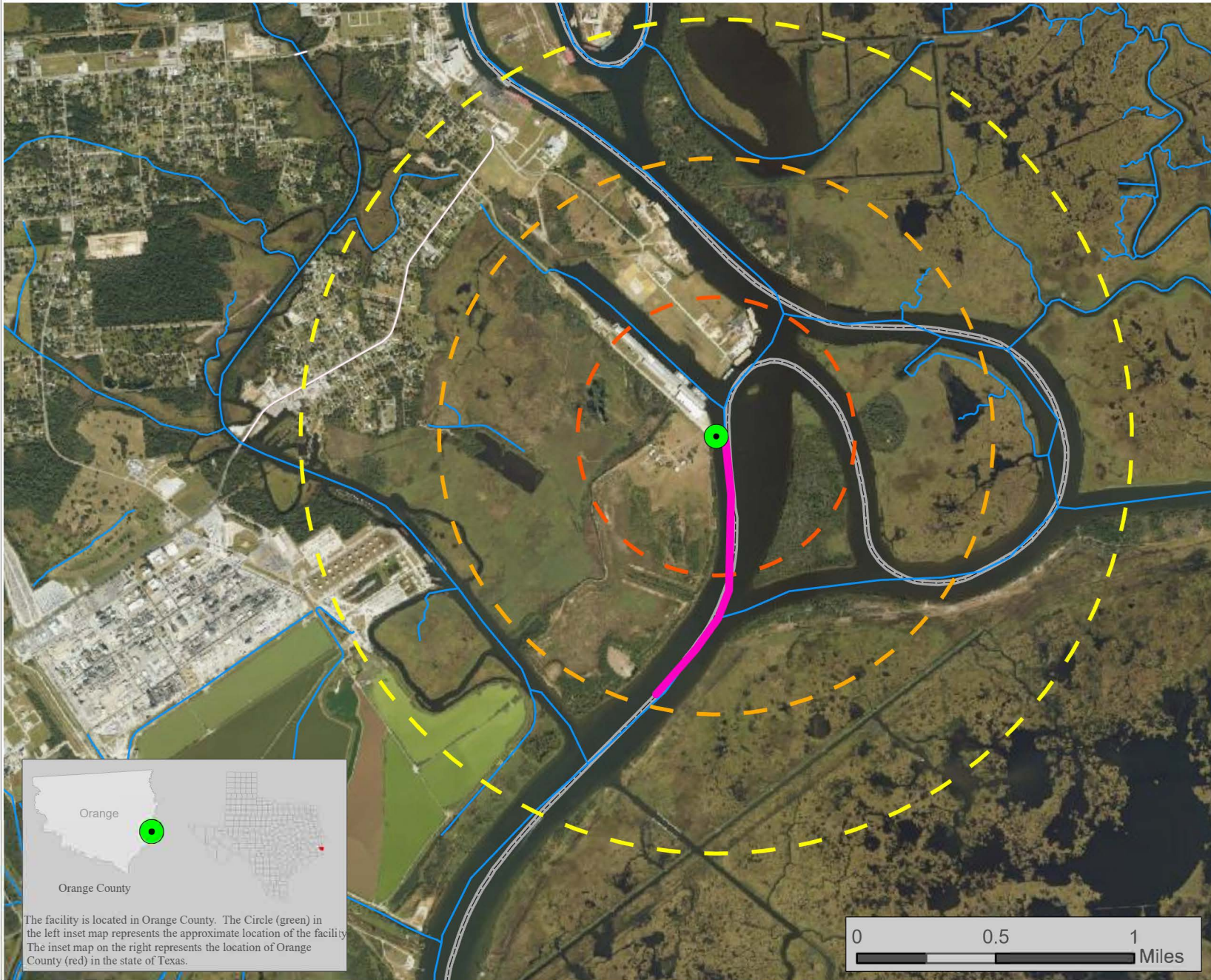


-  Facility
-  0.5 Mile Radius
-  1.0 Mile Radius
-  1.5 Mile Radius
-  Discharge Route

The sole hearing requestor, Jonathan Webster, provided a Connecticut address and is, thus, not pictured on the map.

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.



The facility is located in Orange County. The Circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Orange County (red) in the state of Texas.

Appendix for Golden Triangle Polymers Company LLC

No.	Name	Latitude	Longitude	State	Distance from Outfall (Miles)	Distance from facility (Miles)
1	Jonathan Webster	41.2387N	73.2686W	CT	1379.5	1381.1