

**TCEQ AIR QUALITY PERMIT NUMBERS: 140763, PSDTX1500M1, and
GHGPSDTX46M1; 19871, PSDTX1236M1, and GHGPSDTX221; 91780, PSDTX1240M1,
and GHGPSDTX223; 19200, PSDTX1237M1, and GHGPSDTX218; 19168,
PSDTX1226M1, and GHGPSDTX224; 107518, PSDTX1383M2, and GHGPSDTX48M1;
20203, PSDTX1224M1, and GHGPSDTX222; 40157, PSDTX1222M1, and
GHGPSDTX225; 19201, PSDTX1232M1, and GHGPSDTX219
TCEQ DOCKET NUMBER 2025-1160-AIR**

APPLICATION BY	§	BEFORE THE
FORMOSA PLASTICS CORPORATION,	§	
TEXAS	§	
POINT COMFORT PLANT	§	TEXAS COMMISSION ON
POINT COMFORT, CALHOUN	§	
COUNTY	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUEST

I. EXECUTIVE SUMMARY

The Executive Director recommends denying the hearing request of San Antonio Bay Estuarine Waterkeeper. Although they submitted timely comments on the application, the group has no identified member who would otherwise have standing to request a hearing in their own right. The Executive Director recommends denying the hearing request.

II. INTRODUCTION

The Executive Director of the Texas Commission on Environmental Quality (commission or TCEQ) files this response (Response) to the requests for a contested case hearing submitted by persons listed herein regarding the above-referenced matter. The Texas Clean Air Act (TCAA), Texas Health & Safety Code (THSC) § 382.056(n), requires the commission to consider hearing requests in accordance with the procedures provided in TEX. WATER CODE (TWC) § 5.556.¹ This statute is implemented through the rules in 30 TEX. ADMIN. CODE (TAC) Chapter 55, Subchapter F.

Maps showing the location of the proposed plant are included with this Response and have been provided to all hearing requesters listed on the mailing list for this application. Additionally, the final draft permit, including any special conditions or provisions, for permit nos. 140763, 19871, 91780, 19200, 19168, 107518, 20203, 40157, and 19201, modification to Prevention of Significant Deterioration (PSD) Air Quality Permit Numbers PSDTX1500M1, PSDTX1236M1, PSDTX1240M1, PSDTX1237M1, PSDTX1226M1, PSDTX1383M2, PSDTX1224M1, PSDTX1222M1, and PSDTX1232M1, the Maximum Allowable Emission Rate Table (MAERT), summary of the technical review of the permit application, preliminary determination summary for the permit application, Air Quality Analysis modeling audit, and the compliance summary of the applicant prepared by the Executive Director's staff are being filed concurrently with TCEQ's Office of the Chief Clerk for the Commission's consideration. The Executive Director's Response to Public Comment (RTC), which was mailed by the chief clerk to all persons on the mailing list, is on file with the Office of the Chief Clerk for the commission's

¹ Statutes cited in this response may be viewed online at www.statutes.legis.state.tx.us. Relevant statutes are found primarily in the THSC and the TWC. The rules in the TAC may be viewed online at www.sos.state.tx.us/tac/index.shtml or follow the "Rules" link on the TCEQ website at www.tceq.texas.gov.

consideration.

III. FACILITY DESCRIPTION

Formosa Plastics Corporation, Texas (Applicant or Formosa) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), Texas Health & Safety Code (THSC) § 382.0518. This will authorize the modification of an existing facility that may emit air contaminants.

This permit will authorize the Applicant to modify the Formosa Point Comfort Plant. The facility is located at 201 Formosa Drive, Point Comfort, Calhoun County. Contaminants authorized under these permits include carbon monoxide, nitrogen oxides, organic compounds, hazardous air pollutants, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, and sulfuric acid mist.

IV. PROCEDURAL BACKGROUND

This permit application is for a permit amendment of Air Quality Permit Numbers 140763, 19871, 91780, 19200, 19168, 107518, 20203, 40157, and 19201, modification to Prevention of Significant Deterioration (PSD) Air Quality Permit Numbers PSDTX1500M1, PSDTX1236M1, PSDTX1240M1, PSDTX1237M1, PSDTX1226M1, PSDTX1383M2, PSDTX1224M1, PSDTX1222M1, and PSDTX1232M1, modification to Greenhouse Gas (GHG) PSD Air Quality Permit Numbers GHGPSDTX46M1 and GHGPSDTX48M1 for emissions of GHGs, and issuance of GHG PSD Air Quality Permit Numbers GHGPSDTX221, GHGPSDTX223, GHGPSDTX218, GHGPSDTX224, GHGPSDTX222, GHGPSDTX225, and GHGPSDTX219 for emissions of GHGs. The permit application was received on June 7, 2024, and declared administratively complete on June 13, 2024. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI, first public notice) for this permit application was published in English on June 29, 2024, in the *Orange Leader* and in Spanish on June 27, 2024, in *El Perico*. The Notice of Application and Preliminary Decision for an Air Quality Permit (NAPD, second public notice) was published on October 19, 2024, in English in the *Orange Leader* and on October 17, 2024, in Spanish in *El Perico*. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

The Executive Director's RTC was filed with the Chief Clerk's Office on April 24, 2025, and instructions to access the electronic RTC or request a hard copy were mailed to all interested persons on May 1, 2025, including those who asked to be placed on the mailing list for this application and those who submitted comments or requests for a contested case hearing. The cover letter attached to the RTC included information about making requests for a contested case hearing or for reconsideration of the Executive Director's decision.² The letter also explained that hearing requestors should specify any of the Executive Director's responses to comments they dispute and the factual basis of the dispute, in addition to listing any disputed issues of law or policy.

The time for requests for reconsideration and hearing requests ended on June 2, 2025. The TCEQ received a timely hearing request from San Antonio Bay Estuarine

² See TCEQ rules at Chapter 55, Subchapter F of Title 30 of the Texas Administrative Code. Procedural rules for public input to the permit process are found primarily in Chapters 39, 50, 55, and 80 of Title 30 of the Code.

Waterkeeper. TCEQ did not receive any requests for reconsideration.

V. THE EVALUATION PROCESS FOR HEARING REQUESTS

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment and the commission's consideration of hearing requests. Senate Bill 709 revised the requirements for submitting public comment and the commission's consideration of hearing requests. The evaluation process for hearing requests is as follows:

A. Response to Requests

The Executive Director, the Public Interest Counsel, and the Applicant may each submit written responses to hearing requests. 30 TAC § 55.209(d).

Responses to hearing requests must specifically address:

- 1) whether the requestor is an affected person;
- 2) which issues raised in the hearing request are disputed;
- 3) whether the dispute involves questions of fact or of 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 in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director'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.

30 TAC § 55.209(e).

B. Hearing Request Requirements

In order for the commission to consider a hearing request, the commission must first determine whether the request meets certain requirements:

Affected persons may request a contested case hearing. The request must be made in writing and timely filed with the chief clerk. The request must be based only on the requestor's timely comments and may not be based on an issue that was raised solely in a public comment that was withdrawn by the requestor prior to the filing of the Executive Director's Response to Comment.

30 TAC § 55.201(c).

A hearing request must substantially comply with the following:

- 1) give the time, address, daytime 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 shall be responsible for receiving all official communications and documents for the group;
- 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) 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 Executive Director'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.

30 TAC § 55.201(d).

C. Requirement that Requestor be an Affected Person/ "Affected Person" Status

In order to grant a contested case hearing, the commission must determine that a requestor is an "affected" person. Section 55.203 sets out who may be considered an affected person.

- 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 general public does not qualify as a personal justiciable interest.
- b) Except as provided by 30 TAC § 55.103, 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;
 - 6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor 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.

30 TAC § 55.203

In regard specifically to air quality permits, the activity the commission regulates is the emissions of air contaminants into the atmosphere. Any person who plans to construct or modify a facility that may emit air contaminants must receive authorization from the commission. Commission rules also include a general prohibition against causing a nuisance. Further, for air quality permits, distance from the proposed facility is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility.

For applications filed on or after September 1, 2015, 30 TAC § 55.201(d) allows the commission to consider, to the extent consistent with case law:

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 Executive Director; and
3. any other expert reports, affidavits, opinions, or data submitted by the Executive Director, the applicant, or hearing requestor.

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 SOAH for a hearing." 30 TAC § 50.115(b). The commission may not refer an issue to SOAH for a contested case hearing unless the commission determines that the issue:

- 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 whose hearing request is granted; and
- 3) is relevant and material to the decision on the application. 30 TAC § 50.115(c).

VI. ANALYSIS OF THE HEARING REQUESTS

The Executive Director has analyzed the hearing requests to determine whether they comply with commission rules, if the requestors qualify as affected persons, what issues may be referred for a contested case hearing, and what is the appropriate length of the hearing.

A. Groups and Associations

In addition to the requirements in 30 TAC § 55.201 and 30 TAC § 55.203, requests for a contested case hearing by a group or association, on an application filed on or after September 1, 2015, must meet the requirements in 30 TAC § 55.205(b). Specifically:

(1) the group or association must have submitted timely comments on the application; (2) the request must identify, 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 must be germane to the organization's purpose; and (4) the claim asserted or the relief requested may not require the participation of the individual members in the case.

1. Environmental Integrity Project on behalf of San Antonio Bay Estuarine

Waterkeeper

- (1) Whether the group or association submitted timely comments on the application.

Collin Cox and Mariah Harrod, attorneys for Environmental Integrity Project, submitted separate hearing requests on behalf of San Antonio Bay Estuarine Waterkeeper (hereinafter "Waterkeeper") during the comment period. The issues raised in this hearing request were raised in the group's timely comments. The Executive Director recommends that the commission find that San Antonio Bay Estuarine Waterkeeper has met this requirement for associational standing.

- (2) Whether one or more members of the group or association would otherwise have standing to request a hearing in their own right.

Waterkeeper named a member of the group, Diane Wilson. Waterkeeper stated Ms. Wilson is concerned about the impact additional pollution from Formosa could have on her health when she is recreating in the waters and wetlands around Formosa's Plant, specifically raising concerns about increases in flaring. Waterkeeper stated Ms. Wilson spends time recreating in Lavaca Bay, including swimming, motorboating, and kayaking. Additionally, in connection with her work for Waterkeeper, Ms. Wilson visits Lavaca Bay to monitor pollution. Waterkeeper additionally stated Ms. Wilson is concerned about the natural beauty and resources of the area.

The Executive Director recommends that Ms. Wilson is not an affected person in her own right. As shown on the map, Ms. Wilson resides almost 20 miles from the Formosa facility. Additionally, Ms. Wilson's recreational and monitoring interests are intermittent and common to those of the general public. Therefore, Ms. Wilson cannot be considered an affected person.

Accordingly, the Executive Director recommends that the commission find that San Antonio Bay Estuarine Waterkeeper has not met this requirement for associational standing.

- (3) Whether the interests the group or association seeks to protect are germane to the organization's purpose.

San Antonio Bay Estuarine Waterkeeper is a volunteer-run community organization that is a local affiliate of the national Waterkeeper Alliance. San Antonio Bay Estuarine Waterkeeper's mission is to protect Lavaca Bay, Cox Bay, Keller Bay, Chocolate Bay, Matagorda Bay, San Antonio Bay, and Espiritu Santo Bay and to educate the public about these ecologically important estuarine systems to ensure clean, healthy natural resources for public health and wildlife. San Antonio Bay Estuarine Waterkeeper also promotes the preservation of local wetlands and waterways for recreational uses and promotes appreciation and restoration of these areas.

Accordingly, the Executive Director recommends that the Commission find that San Antonio Bay Estuarine Waterkeeper has met this requirement for associational standing.

- (4) Whether the claim asserted or the relief requested requires the participation of the individual members in the case.

The relief requested by Waterkeeper does not require the participation of any individual member of Waterkeeper. Thus, the Executive Director has determined that San Antonio Bay Estuarine Waterkeeper has met this requirement for associational standing.

Because San Antonio Bay Estuarine Waterkeeper has not met all four requirements for associational standing, the Executive Director recommends the commission find that San Antonio Bay Estuarine Waterkeeper is not an affected person.

Waterkeeper raised the following issues in its Contested Case Hearing request:

B. Whether Issues Raised are Referable to SOAH for a Contested Case Hearing

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 RTC. 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 requestor whose request is granted may be referred.³ The issues raised for this application and the Executive Director's analysis and recommendations follow.

If the Commission finds affected party status, the following issues involve a disputed question of fact, were not withdrawn, and are relevant and material to the approval of the permit:

Issue 1: Whether the proposed emissions will threaten the health and safety of nearby residents.

Issue 2: Whether the proposed emissions will cause or contribute to exceedances of National Ambient Air Quality Standards ("NAAQS"), including (but not limited to) the NAAQS for nitrogen dioxide and ozone.

Issue 3: Whether the proposed emissions will exceed allowable Prevention of Significant Deterioration Increments, including (but not limited to) nitrogen dioxide, carbon monoxide, and ozone.

Issue 4: Whether the proposed emissions will cause nuisance conditions violating 30 Tex. Admin. Code § 101.4.

Issue 5: Whether Draft Permit conditions are adequate to protect the public from cumulative risks in accordance with Tex. Water Code § 5.130.

Issue 6: Whether the expanded plant will be protective of welfare, including wildlife and the environment in the surrounding area.

Issue 7: Whether Formosa's air quality analysis complies with TCEQ's rules and guidance.

Issue 8: Whether the new and modified sources will utilize Best Available Control Technology.

Issue 9: Whether the emissions calculation methodologies used in the application are flawed or outdated.

Issue 10: Whether proposed air monitoring and reporting requirements are adequate to ensure compliance with the Clean Air Act and protect local residents.

Issue 11: Whether Formosa needs to authorize additional flaring in this permitting action.

Issue 12: Whether the permit conditions will prevent Formosa from increasing flaring.

Issue 13: Whether Formosa should be required to install a flare gas recovery system to

³ Tx. Govt. Code § 2003.047(e-1); 30 TAC § 55.211 (c)(2)(A)(ii).

reduce flaring.

Issue 14: Whether the permits' monitoring, reporting, record keeping, and emission calculation requirements are sufficient to ensure compliance with the relevant emission limits, including limits for the flares.

Issue 15: Whether the relevant permit provisions are adequate to ensure that Formosa's flares destroy 99% of volatile organic compounds with three or fewer carbon atoms.

Issue 16: Whether the relevant permit provisions are adequate to ensure that Formosa's flares destroy 98% of volatile organic compounds with four or more carbon atoms.

Issue 17: Whether Formosa underestimated its flares' potential emission rates for volatile organic compounds.

Issue 18: Whether the 99% and 98% destruction removal efficiency rates are practically enforceable.

Issue 19: Whether Formosa has incorporated sufficient monitoring, record keeping, and reporting requirements to ensure compliance with distinct emission caps applicable to the same flares.

Issue 20: Whether Formosa and TCEQ supplied the public with adequate information to verify the bases for the Formosa's claims and for TCEQ's decision to issue the permits.

Issue 21: Whether TCEQ adequately evaluated Formosa's compliance history.

Because these issues are relevant and material to the issuance of the draft permit and involve disputed issues of fact, if the commission should find that any party is affected, the Executive Director recommends that these issues be referred to SOAH.

Additionally, the Requestors raised the following issues that involve disputed questions of fact and were not withdrawn; however, they are not relevant and material to the issuance of the permit. The TCEQ's jurisdiction is limited to the issues set forth in statute:

Issue 22: Whether greenhouse gas controls reflect the use of Best Available Control Technology.

GHG permits are not subject to a contested case hearing.

Issue 23: Whether Formosa and TCEQ adequately considered the environmental justice impacts of the proposed pollution increases.

TCEQ does not have jurisdiction to consider environmental justice impacts.

VII. CONCLUSION

The Executive Director respectfully recommends the commission:

1. Find all hearing requests in this matter were timely filed; and
2. Find that San Antonio Bay Estuarine Waterkeeper is not an affected person as a matter of law and deny their hearing request.
3. If referred to SOAH, first refer the matter to Alternative Dispute Resolution for a reasonable period.

4. If referred to SOAH, the Executive Director recommends referring the issues as discussed in Section VI.
5. If referred to SOAH, the Executive Director recommends 180 days be the duration of the hearing.

Respectfully submitted,

Kelly Keel, Executive Director

Phillip Ledbetter, Director
Office of Legal Services

Charmaine K. Backens, Deputy Director
Environmental Law Division

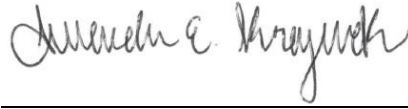


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REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on this 15th day of September, 2025, a true and correct copy of the "Executive Director's Response to Hearing Requests" was served on all persons on the service list by the undersigned via electronic filing, electronic mail, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.

A handwritten signature in dark ink, appearing to read "Amanda E. Kraynok", is positioned above a horizontal line.

Amanda Kraynok, Staff Attorney
Environmental Law Division

Attachment A

Formosa Plastics Corporation - 140763, et al.

Map Requested by TCEQ Office of Legal Services
for Commissioners' Agenda



*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: 6/4/2025
CRF 0123781
Cartographer: RKukushk

- Emission Points (EPNs)
- ★ Requestor: Diane Wilson
- 1.5 miles from EPNs
- 1 mile from EPNs
- 0.5 miles from EPNs
- Highway
- Intermediate Roads
- County Boundary



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.

Formosa Plastics Corporation - 140763, et al.

Number	First Name	Last Name	Address	Latitude	Longitude	Nearest EPN	Distance
Star	Diane	Wilson	600 Ramona Road, Seadrift, TX, 77983-4203	28.399703	-96.622586	1028	20.96 miles

MAILING LIST

Formosa Plastics Corporation, Texas

TCEQ Docket No. 2025-1160-AIR;

Air Permit Nos. 140763, PSDTX1500M1, and GHGPSDTX46M1; 19871, PSDTX1236M1, and GHGPSDTX221; 91780, PSDTX1240M1, and GHGPSDTX223; 19200, PSDTX1237M1, and GHGPSDTX218; 19168, PSDTX1226M1, and GHGPSDTX224; 107518, PSDTX1383M2, and GHGPSDTX48M1; 20203, PSDTX1224M1, and GHGPSDTX222; 40157, PSDTX1222M1, and GHGPSDTX225; 19201, PSDTX1232M1, and GHGPSDTX219

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