

Stewart Engineering Services - Firm 18697

16531 Shady Lane – Channelview, Texas 77530

Phone: 281 – 862 – 9769

20 February 2024

REVIEWED
2024
MAR 11 2023
By Gcw H

CHIEF CLERKS OFFICE

2024 MAR 11 AM 11:14

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

Texas Commission on Environmental Quality
Attn: Office of Chief Clerk, MC 105, TCEQ,
P.O. Box 13087
Austin, Texas 78711-3087

RE: Contested Case Hearing – WQ 0000391000

Purpose of this letter – I request a contested case hearing on the proposed permit,
WQ 0000391000.

Applicant for the permit – Lyondell Chemical Corporation

2502 Sheldon Road, Channelview, Texas 77530

Contestant – Douglas R. Stewart – 16916/16918 Shady Lane, Channelview, Texas 77530

Phone Number – 281-862-9769

I am also contesting for the other properties I own or mortgage which are
Listed in attached letter dated 16 October 2021

- Comments – Rather than replicate a previous letter I have attached a copy of the previously sent letter to TCEQ. This request is now awaiting hearing with the SOAH.
- Since this request increases the discharge rate from the currently proposed rate of 3,900,000 gallons per day (now before the SOAH) by two hundred and twenty eight percent (8,900,000 gallons per day now requested) the approximate numbers in the attached letter can be upgraded by 228%.
- The current flow rate has destroyed the flood control ditch into which outfall 001 discharges. The eroded soil has been and is continuing to be deposited into Bear Lake.
- As a citizen I am pointing out a problem that should be solved.
- All that is necessary is for the citizens, TCEQ, and Lyondell Chemical to work together and correct what is a serious problem (which will worsen) if not properly addressed. The problem needs to be continually contested until it is solved. Again, the problem is solvable, and the expertise exists to solve the problem.

I respectfully request and would appreciate some acknowledgement you have received this communication (TCEQ and Lyondell) and request for a contested hearing regarding
WQ 0000391000.

Sincerely.

DR Stewart

Douglas R. Stewart – P.E. 42694



20/2/24

Stewart Engineering Services - Firm 18697

16531 Shady Lane – Channelview, Texas 77530

Phone: 281 – 862 – 9769

16 October 2021

CHIEF CLERKS OFFICE

2021 MAR 11 AM 11:14

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

Texas Commission on Environmental Quality
Attn: Office of Chief Clerk, MC 105, TCEQ,
P.O. Box 13087
Austin, Texas 78711-3087

RE: Contested Case Hearing – WQ 0002927000

Purpose of this letter – I request a contested case hearing on the proposed permit WQ 0002927000.

Applicant for the permit – Lyondell Chemical Corporation
2502 Sheldon Road, Channelview, Texas 77530

Contestant – Douglas R. Stewart – 16916/16918 Shady Lane, Channelview, Texas 77530
Phone Number – 281-862-9769

I am also contesting for the other properties I own or mortgage which are
Listed in this letter requesting a contested case hearing.

Comments - The waters of Bear Lake have been polluted in the past by effluents discharged through the Harris County Flood Control Ditch (G103-02-03). At one time the effluent was on a weekly basis and a contested hearing was granted and a public hearing held in Houston, Harris County. The discharge which had been seen on a regular and almost a weekly basis was discontinued. However, it has again began to re-appear. I have personally witnessed it at least twice in the last several months.

Since the time of the last contested hearing the discharge rate allowed by TCEQ has steadily increased by approximately 3-4 times including the present proposal. This permit, if allowed will increase the discharge rate approx. 20% and affect between 70 and 100 processes which provide discharge amounts for the effluent stream.

The estimated volume of water in Bear Lake is approximately 95,000,000 gallons. This is gleaned from estimating the volume of an area beginning at the proposed outfall into Bear Lake thence 1600' to the west side of the San Jacinto River, thence 4000' south to the railroad trestle over the river, and thence 4600' to the point of beginning at the outfall. It is estimated that the average depth of this area is 5'. At a discharge rate of 3,800,000 gallons per day (proposed by the permit request) the water in Bear Lake would be replaced in its entirety about every 25 days or roughly 15 times per year. Bear Lake would have to be able to clean itself every 25 days?

All of this is being considered because of the difference in water hardness values of the input water to the facility and the water hardness values of Bear Lake. I have spoken with representatives of TCEQ (call in number) who referred me to the Office of Chief Clerk who referred me to another person in water quality. All of these were not familiar with the permit in question and could not speak to any question I asked. I also spoke to Nancy Ross, Senior Environmental Engineer for Lyondell Chemical. I was not successful in determining where the plant water was coming from, what is the water hardness of the incoming plant water, and where in Bear Lake was the water Hardness tests conducted. What testing methods were used? This is a subject which I would very much like to discuss with someone from the plant technical staff.

The water hardness for this part of Texas ranges from 60-120 PPM and is listed as moderately hard. This is not a large spread. I am trying to find out how such a small deviation in water hardness can drive such a large opportunity to unload massive amounts of plant production and operation water into Bear Lake. Where do the residuals (suspended solids) from the plant operation (somewhere between 70-100 different sources listed in the letter) end up? A delta of some sort of material has already been produced (an inclusion of about 50,000 ft3 into Bear Lake) staring at the point of entry into Bear Lake and extending approximately 250' into Bear Lake. This is a subject which I would very much like to discuss with someone from the plant technical staff.

The major elements affecting water hardness are calcium and magnesium. Aluminum, manganese, and iron can play a minor role. It is not an uncommon procedure for industries using large amounts of water to use water softening devices to soften the water prior to putting it into their production processes. Was this considered? This is a subject I would very much like to Discuss with someone from the plant technical staff.

Properties affected by this permit proposal (which I own or mortgage) include the following. Several of these properties have multiple lots associated with the address given. I have given their distance from the property line to Lyondell Chemical property line (PLine), to the flood control ditch (G103-02-03) which conveys the discharge from Lyondell (HCFCD), and a straight line from the closest part of the properties given to an approximate location of what is considered the outfall into Bear Lake (Outfall).

	PLine	HCFCD	Outfall
- 16918 Shady Lane	180'	550'	500'
- 16916 Shady Lane	280'	650'	600'
- 16817 Shady Lane	share w/Lyondell	400'	1200'
- 16816 Shady Lane	580'	1030'	1070'
- 16818 Shady Lane	580'	1030'	1070'
- 16810 Shady Lane	660'	1030'	1260'
- 16547 Shady Lane	share w/Lyondell	460'	1500'
- 16531 Shady Lane	share w/Lyondell	520'	2200'
- 1525 Park Lane	1400'	1700'	1800'

If the worst is assumed and the permit allows an increase of dirty water discharge into the lake it directly affects my home (16916 and 16918 shady lane) where I have lived on the water for 52 years. Dirty water discourages the use of our pier and boating facilities. It also affects other property (see list) which I have developed (some of which I have under mortgage). I could lose revenue (approximately 2 million invested) and people could suffer a sickness of some sort from any contact they might have with the water. I could possibly be legally responsible in some way. At the far end of the properties my business (16531 Shady Lane) could possibly suffer financially as well.

It is not my intention to go through the process which myself and many other neighbors went through years ago. I would really like to sit down with someone who can answer my questions so I can understand the reasoning behind proposing all the proposed changes based on a small change in water hardness. This could alleviate all the concerns I have about what is being proposed. It is my preference to speak with someone from the plant staff for Lyondell Chemical Corporation who had a direct role to play in gathering, evaluating, and presenting information supporting this request for permit to TCEQ.

I believe I have included all the information you have requested. Maybe not in the desired order, but I believe it is there. Please contact me at the phone number given if I need to clarify or add something. Please contact me if there is a need for additional information or clarification.

I respectfully request and would appreciate some acknowledgement you have received this communication (TCEQ and Lyondell) and request for a contested hearing regarding WQ 0002927000.

Sincerely,

DR Stewart

Douglas R. Stewart – P.E. 42694



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR TPDES PERMIT FOR INDUSTRIAL WASTEWATER

AMENDMENT

PERMIT NO. WQ0000391000

APPLICATION AND PRELIMINARY DECISION. Equistar Chemicals, LP, P.O. Box 777, Channelview, Texas 77530, which operates Equistar Chemicals Channelview Complex, a bulk and commodity organic chemicals and thermoplastics resins production facility, has applied to the Texas Commission on Environmental Quality (TCEQ) for a major amendment of Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0000391000 to authorize the removal of a monitoring and reporting requirement and daily maximum concentration limit for total aluminum at Outfall 003; removal of a monitoring and reporting requirement for total zinc at Outfall 003; and removal of a monitoring and reporting requirement and daily maximum concentration limit for total zinc at Outfall 004. The draft permit authorizes the discharge of treated organic chemical manufacturing process wastewater, Houston Technology Center (HTC) wastewater, auto shop wastewater, laboratory wastewater, cooling tower and boiler blowdown, sanitary wastewater, loading area and process area washdown, tank farm wastewater, heat exchanger blasting slab waste, utility wastewater, cooling tower and boiler maintenance wastewaters, water treatment wastewaters, water from landfarm, steam condensate and blowdown, demineralization regeneration blowdown, methanol neutralization sump wastewater, hydrostatic test water, maintenance wastewater, groundwater from monitoring and recovery wells (on-site and off-site), process area stormwater runoff, construction stormwater, and process area stormwater from the adjacent co-generation facility at a daily average flow not to exceed 8,900,000 gallons per day via Outfall 001; process wastewater, stormwater, sanitary wastewater associated with a septic chlorinator on an intermittent and flow-variable basis via Outfall 101; sanitary wastewater associated with a septic chlorinator on an intermittent and flow-variable basis via Outfall 201; *de minimis* quantities from spill cleanups, utility wastewater, construction water, non-process area stormwater runoff, stormwater (from secondary containment structures), and post-first flush process area stormwater runoff on an intermittent and flow-variable basis via Outfalls 002 and 004; *de minimis* quantities from spill cleanups, utility wastewater, construction water, and stormwater runoff on an intermittent and flow-variable basis via Outfalls 003 (003A, 003B, 003C) and 005; HTC-area stormwater on an intermittent and flow-variable basis via Outfall 006; and stormwater associated with construction activities from a concrete batch plant on an intermittent and flow-variable basis via Outfall 007. The TCEQ received this application on March 1, 2023.

The facility is located at 8280 Sheldon Road, in the City of Channelview, Harris County, Texas 77530. This link to an electronic map of the site or facility's general location is provided as a public courtesy and is not part of the application or notice. For the exact location, refer to the application.

<https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.118055,29.832777&level=18>

The effluent is discharged via Outfalls 001 and 004 to an unnamed drainage ditch, thence to Wallisville Gully, thence to San Jacinto River Tidal; via Outfall 002 to Wallisville Gully, thence to San Jacinto River Tidal; via Outfall 005 directly to the San Jacinto River Tidal; via Outfall 003 to an unnamed drainage ditch, thence to Harris County Flood Control District (HCFCD) ditch G103-02-03, thence to the San Jacinto River Tidal; and via Outfall 006 to HCFCD ditch G103-07-05, thence to San Jacinto River Tidal in Segment No. 1001 of the San Jacinto River Basin. The designated uses for Segment No. 1001 are primary contact recreation and high aquatic life use.

In accordance with 30 Texas Administrative 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. A Tier 1 antidegradation review has preliminarily determined that existing water quality uses will not be impaired by this 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 San Jacinto River Tidal, which has been identified as having high aquatic life use. Existing uses will be maintained and protected. The preliminary determination can be reexamined and may be modified if new information is received.

The TCEQ Executive Director reviewed this action for consistency with the Texas Coastal Management Program (CMP) goals and policies in accordance with the regulations of the General Land Office and has determined that the action is consistent with the applicable CMP goals and policies.

The TCEQ Executive Director has completed the technical review of the application and prepared a draft permit. The draft permit, if approved, would establish the conditions under which the facility must operate. The Executive Director has made a preliminary decision that this permit, if issued, meets all statutory and regulatory requirements. The permit application, Executive Director's preliminary decision, and draft permit are available for viewing and copying at the North Channel Harris County Library, 15741 Wallisville Road, Houston, Texas.

ALTERNATIVE LANGUAGE NOTICE. Alternative language notice in Spanish is available at <https://www.tceq.texas.gov/permitting/wastewater/plain-language-summaries-and-public-notices>. El aviso de idioma alternativo en español está disponible en <https://www.tceq.texas.gov/permitting/wastewater/plain-language-summaries-and-public-notices>.

PUBLIC COMMENT / PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit written or oral comment or to ask questions about the application. Generally, the TCEQ will hold a public meeting if the Executive Director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

OPPORTUNITY FOR A CONTESTED CASE HEARING. After the deadline for public comments, the Executive Director will consider the comments and prepare a response to all relevant and material, or significant public comments. **The response to comments, along with the Executive Director's decision on the application, will be mailed to everyone who submitted public comments or who requested to be on a mailing list for this application. If comments are received, the mailing will also provide instructions for requesting a contested case hearing or reconsideration of the Executive Director's decision.** A contested case hearing is a legal proceeding similar to a civil trial in a state district court.

TO REQUEST A CONTESTED CASE HEARING, YOU MUST INCLUDE THE FOLLOWING ITEMS IN YOUR REQUEST: your name, address, phone number; applicant's name and proposed permit number; the location and distance of your property/activities relative to the proposed facility; a specific description of how you would be adversely affected by the facility in a way not common to the general public; a list of all disputed issues of fact that you submit during the comment period; and the statement "[I/we] request a contested case hearing." If the request for contested case hearing is filed on behalf of a group or association, the request must designate the group's representative for receiving future correspondence; identify by name and physical address an individual member of the group who would be adversely affected by the proposed facility or activity; provide the information discussed above regarding the affected member's location and distance from the facility or activity; explain how and why the member would be affected; and explain how the interests the group seeks to protect are relevant to the group's purpose.

Following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for reconsideration or for a contested case hearing to the TCEQ Commissioners for their consideration at a scheduled Commission meeting.

The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material water quality concerns submitted during the comment period.**

EXECUTIVE DIRECTOR ACTION. The Executive Director may issue final approval of the application unless a timely contested case hearing request or a timely request for reconsideration is filed. If a timely hearing request or request for reconsideration is filed, the Executive Director will not issue final approval of the permit and will forward the application and requests to the TCEQ Commissioners for their consideration at a scheduled Commission meeting.

MAILING LIST. If you submit public comments, a request for a contested case hearing or a reconsideration of the Executive Director's decision, you will be added to the mailing list for this specific application to receive future public notices mailed by the Office of the Chief Clerk. In addition, you may request to be added to: (1) the permanent list for a specific applicant name and permit number; and (2) the mailing list for a specific county. If you wish to be placed on the permanent and the county mailing list, clearly specify which list(s) and send your request to TCEQ Office of the Chief Clerk at the address below.

All written public comments and public meeting requests must be submitted to the Office of the Chief Clerk, MC 105, TCEQ, P.O. Box 13087, Austin, TX 78711-3087 or electronically at <https://www.tceq.texas.gov/goto/comment/> within 30 days from the date of newspaper publication of this notice.

INFORMATION AVAILABLE ONLINE. For details about the status of the application, visit the Commissioners' Integrated Database at <https://www.tceq.texas.gov/goto/cid/>. Search the database using the permit number for this application, which is provided at the top of this notice.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at <https://www.tceq.texas.gov/goto/comment/> or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address, and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the TCEQ Public Education Program, toll free, at 1-800-687-4040 or visit their website at <https://www.tceq.texas.gov/agency/decisions/participation/permitting-participation>. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Equistar Chemicals, LP at the address stated above or by calling Mr. Joseph Reza, Senior Environmental Engineer, at 281-457-8032.

Issued: January 30, 2024

Comisión De Calidad Ambiental Del Estado De Texas



AVISO DE LA SOLICITUD Y DECISIÓN PRELIMINAR PARA EL PERMISO DEL SISTEMA DE ELIMINACION DE DESCARGAS DE CONTAMINANTES DE TEXAS (TPDES) PARA AGUAS RESIDUALES INDUSTRIALES

MODIFICACION

PERMISO NO. WQ0000391000

SOLICITUD. Equistar Chemicals, LP, P.O. Box 777, Channelview, Texas 77530, que opera el Complejo de Equistar Chemicals Channelview, una planta para la producción de productos químicos orgánicos a granel y básicos y resinas termoplásticas, ha solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) para modificar de Permiso No. WQ0000391000 del Sistema de Eliminación de Descargas de Contaminantes de Texas (TPDES) para autorizar la eliminación de un el requisito de seguimiento y presentación de informes y el límite máximo diario de concentración de aluminio total de Desagüe 003; la eliminación de un el requisito de seguimiento y presentación de informes de zinc total de Desagües 003; la eliminación de un el requisito de seguimiento y presentación de informes y el límite máximo diario de concentración de zinc total de Desagües 004. El permiso preliminar autoriza la descarga de aguas residuales tratadas del proceso de fabricación de productos químicos orgánicos, aguas residuales de la Houston Technology Center (HTC) aguas residuales de la Instalación de mantenimiento de automóviles, aguas residuales de laboratorio, purga de torres de enfriamiento y calderas, aguas residuales sanitarias, lavado de áreas de carga y áreas de proceso, aguas residuales del Patio de tanques, residuos de losas de voladura de intercambiadores de calor, aguas residuales de utilidad, aguas residuales de torres de refrigeración, aguas residuales de tratamiento de agua, agua de granjas terrestres, condensado y purga de vapor, purga de regeneración de desmineralización, aguas residuales del sumidero de neutralización de metanol, agua de prueba hidrostática, aguas residuales de mantenimiento, aguas subterráneas de pozos de monitoreo y recuperación (en el sitio y fuera del sitio), escorrentía de aguas pluviales del área de proceso, aguas pluviales de construcción y aguas pluviales del área de proceso de la instalación de cogeneración adyacente a un flujo promedio diario que no exceda 8,900,000 galones por día vía Desagüe 001, aguas residuales de proceso, aguas pluviales, aguas residuales sanitarias asociadas a un clorinador séptico de forma intermitente y variable de flujo a través vía Desagüe 001; aguas residuales sanitarias asociadas a un clorinador séptico de forma intermitente y variable de flujo a través vía Desagüe 201; cantidades *de minimis* procedentes de la limpieza de derrames, aguas residuales de utilidad, agua de construcción, escorrentía de aguas pluviales del área fuera del proceso, aguas pluviales (de estructuras de contención secundarias) y escorrentía de aguas pluviales del área de proceso posterior al primer lavado de forma intermitente y de flujo variable vía Desagües 002 y 004; cantidades *de minimis* de limpieza de derrames, aguas residuales de utilidad, agua de construcción, escorrentía de aguas pluviales de forma intermitente y variable de flujo vía Desagües 003 (003A, 003B, 003C) y 005; aguas pluviales de área HTC de forma intermitente y de flujo variable vía Desagüe 006; aguas pluviales asociadas a las actividades de construcción de una planta mezcladora de concreto de forma intermitente y variable de flujo vía Desagüe 007. La TCEQ recibió esta solicitud el 01 de marzo de 2023.

La instalación está ubicada en 8280 Sheldon Road, Channelview, Condado de Harris, Texas 77530. Este enlace a un mapa electrónico de la ubicación general del sitio o de la instalación es proporcionado como una cortesía y no es parte de la solicitud o del aviso. Para la ubicación exacta, consulte la solicitud.

<https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.118055,29.832777&level=18>

El efluente se descarga vía Desagüe 001 y 004 a una zanja de drenaje sin nombre, y entonces a la Marea del río San Jacinto, vía Desagüe 002 a Wallisville Gully, y entonces a la Marea del río San Jacinto; vía Desagüe 005 directamente a la Marea del río San Jacinto; vía Desagüe 003 a una zanja de drenaje sin nombre, y entonces a la Zanja G103-02-03 de Harris County Flood Control District (HCFCD), y vía Desagüe 006 a la Zanja G103-07-05 de la HCFCD, y entonces a la Marea del río San Jacinto en el Segmento No. 1001 de la Cuenca del río San Jacinto. Los usos designados para el Segmento No. 1001 son recreación de contacto primario y elevados usos elevados de vida acuática.

De acuerdo con la 30 TAC §307.5 y los procedimientos de implementación de la TCEQ (Enero 2010) para las Normas de Calidad de Aguas Superficiales en Texas, fue realizada una revisión de la antidegradación de las aguas recibidas. Una revisión de antidegradación del Nivel 1 ha determinado preliminarmente que los usos de la calidad del agua existente no serán perjudicados por la acción de este permiso. Se mantendrá un criterio narrativo y numérico para proteger los usos existentes. Una revisión del Nivel 2 ha determinado preliminarmente que no se espera ninguna degradación significativa en la Marea del río San Jacinto, el cual se ha identificado que tiene altos usos en la vida acuática. Los usos existentes serán mantenidos y protegidos. La determinación preliminar puede ser reexaminada y puede ser modificada, si se recibe alguna información nueva.

El Director Ejecutivo de la TCEQ ha revisado esta medida para ver si está de acuerdo con los objetivos y las regulaciones del Programa de Administración Costero de Texas (CMP) de acuerdo con las regulaciones del Consejo Coordinador de la Costa (CCC) y ha determinado que la acción es conforme con las metas y regulaciones pertinentes del CMP.

El Director Ejecutivo de la TCEQ ha completado la revisión técnica de la solicitud y ha preparado un borrador del permiso. El borrador del permiso, si es aprobado, establecería las condiciones bajo las cuales la instalación debe operar. El Director Ejecutivo ha tomado una decisión preliminar que si este permiso es emitido, cumple con todos los requisitos normativos y legales. La solicitud del permiso, la decisión preliminar del Director Ejecutivo y el borrador del permiso están disponibles para leer y copiar en la Biblioteca pública del Condado de Harris en North Channel, 15741 Wallisville Road, Houston, Texas.

AVISO DE IDIOMA ALTERNATIVO. El aviso de idioma alternativo en español está disponible en <https://www.tceq.texas.gov/permitting/wastewater/plain-language-summaries-and-public-notice>.

COMENTARIO PUBLICO / REUNION PUBLICA. Usted puede presentar comentarios públicos o pedir una reunión pública sobre esta solicitud. El propósito de una reunión pública es dar la oportunidad de presentar comentarios o hacer preguntas acerca de la solicitud. La TCEQ realiza una reunión pública si el Director Ejecutivo determina que hay un grado de interés público suficiente en la solicitud o si un legislador local lo pide. Una reunión pública no es una audiencia administrativa de lo contencioso.

OPORTUNIDAD DE UNA AUDIENCIA ADMINISTRATIVA DE LO CONTENCIOSO.

Después del plazo para presentar comentarios públicos, el Director Ejecutivo considerará todos los comentarios apropiados y preparará una respuesta a todo los comentarios públicos esenciales, pertinentes, o significativos. **La respuesta a los comentarios y la decisión del Director Ejecutivo sobre la solicitud serán enviados por correo a todos los que presentaron un comentario público y a las personas que están en la lista para recibir avisos sobre esta solicitud. Si se reciben comentarios, el aviso también proveerá instrucciones para pedir una reconsideración de la decisión del Director Ejecutivo y para pedir una audiencia administrativa de lo contencioso.** Una audiencia administrativa de lo contencioso es un procedimiento legal similar a un procedimiento legal civil en un tribunal de distrito del estado.

PARA SOLICITAR UNA AUDIENCIA DE CASO IMPUGNADO, USTED DEBE INCLUIR EN SU SOLICITUD LOS SIGUIENTES DATOS: su nombre, dirección, y número de teléfono; el nombre del solicitante y número del permiso; la ubicación y distancia de su propiedad/actividad con respecto a la instalación; una descripción específica de la forma cómo usted sería afectado adversamente por el sitio de una manera no común al público en general; una lista de todas las cuestiones de hecho en disputa que usted presente durante el período de comentarios; y la declaración “[Yo/nosotros] solicito/solicitamos una audiencia de caso impugnado”. Si presenta la petición para una audiencia de caso impugnado de parte de un grupo o asociación, debe identificar una persona que representa al grupo para recibir correspondencia en el futuro; identificar el nombre y la dirección de un miembro del grupo que sería afectado adversamente por la planta o la actividad propuesta; proveer la información indicada anteriormente con respecto a la ubicación del miembro afectado y su distancia de la planta o actividad propuesta; explicar cómo y porqué el miembro sería afectado; y explicar cómo los intereses que el grupo desea proteger son pertinentes al propósito del grupo.

Después del cierre de todos los períodos de comentarios y de petición que aplican, el Director Ejecutivo enviará la solicitud y cualquier petición para reconsideración o para una audiencia de caso impugnado a los Comisionados de la TCEQ para su consideración durante una reunión programada de la Comisión.

La Comisión sólo puede conceder una solicitud de una audiencia de caso impugnado sobre los temas que el solicitante haya presentado en sus comentarios oportunos que no fueron retirados posteriormente. **Si se concede una audiencia, el tema de la audiencia estará limitado a cuestiones de hecho en disputa o cuestiones mixtas de hecho y de derecho relacionadas a intereses pertinentes y materiales de calidad del agua que se hayan presentado durante el período de comentarios.**

ACCIÓN DEL DIRECTOR EJECUTIVO. El Director Ejecutivo puede emitir una aprobación final de la solicitud a menos que exista un pedido antes del plazo de vencimiento de una audiencia administrativa de lo contencioso o se ha presentado un pedido de reconsideración. Si un pedido ha llegado antes del plazo de vencimiento de la audiencia o el pedido de reconsideración ha sido presentado, el Director Ejecutivo no emitirá una aprobación final sobre el permiso y enviará la solicitud y el pedido a los Comisionados de la TECQ para consideración en una reunión programada de la Comisión.

LISTA DE CORREO. Si somete comentarios públicos, un pedido para una audiencia administrativa de lo contencioso o una reconsideración de la decisión del Director Ejecutivo, la Oficina del Secretario Principal enviará por correo los avisos públicos en relación con la solicitud. Además, puede pedir que la TCEQ ponga su nombre en una o más de las listas correos siguientes (1) la lista de correo permanente para recibir los avisos del solicitante indicado por nombre y número del permiso específico y/o (2) la lista de correo de todas las solicitudes en un condado específico. Si desea que se agregue su nombre en una de las listas designe cual lista(s) y envía por correo su pedido a la Oficina del Secretario Principal de la TCEQ en la dirección de abajo.

Todos los comentarios escritos del público y los pedidos una reunión deben ser presentados durante los 30 días después de la publicación del aviso a la Oficina del Secretario Principal, MC 105, TCEQ, P.O. Box 13087, Austin, TX 78711-3087 or por el internet a www.tceq.texas.gov/about/comments.html.

DISPONIBILIDAD ELECTRÓNICA DE INFORMACIÓN. Para obtener información sobre el estado de la solicitud, visite la Base de Datos Integrada de los Comisionados en www.tceq.texas.gov/goto/cid. Busque en la base de datos con el número de permiso para esta aplicación, que se proporciona en la parte superior de este aviso.

CONTACTOS E INFORMACIÓN A LA AGENCIA. Todos los comentarios públicos y solicitudes deben ser presentadas electrónicamente vía <https://www.tceq.texas.gov/goto/comment/> o por escrito a la Comisión de Texas de Calidad Ambiental, Oficial de la Secretaría (Office of Chief Clerk), MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Tenga en cuenta que cualquier información personal que usted proporcione, incluyendo su nombre, número de teléfono, dirección de correo electrónico y dirección física pasarán a formar parte del registro público de la Agencia. Para obtener más información acerca de esta solicitud de permiso o el proceso de permisos, llame al programa de educación pública de la TCEQ, gratis, al 1-800-687-4040 o visite su sitio web en <https://www.tceq.texas.gov/agency/decisions/participation/permitting-participation>. Si desea información en Español, puede llamar al 1-800-687-4040.

También se puede obtener información adicional de Equistar Chemicals, LP a la dirección indicada arriba o llamando a Sr. Joseph A. Reza, Ingeniero Ambiental Senior, al 281-457-8032.

Fecha de emisión: 30 de enero de 2024

16916 Shady Lane
Channelview, Texas 77530



9589 0710 5270 1012 9553 92

Retail



RDC 99



78711

U.S. POSTAGE
FCM LG ENV
CROSBY, TX 7
FEB 29, 2024

\$6.03

R2305K137489

RECEIVED
MAR 11 2024
TOGO MAIL CENTER
BC

Texas Commission on Environmental Quality
ATTN: Office of Chief Clerk MC 105, TC
P.O. Box 13087
Austin, Texas 78711-3087

CHIEF CLERK (

00013

Renee Lyle

From: PUBCOMMENT-OCC
Sent: Monday, January 22, 2024 3:09 PM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0000391000
Attachments: HCA Comment on Equistar Chemicals WQ000039100001.pdf

From: elizabeth.hidalgo@harriscountytexas.gov <elizabeth.hidalgo@harriscountytexas.gov>
Sent: Sunday, January 21, 2024 10:51 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0000391000

REGULATED ENTY NAME EQUISTAR CHEMICALS CHANNELVIEW COMPLEX

RN NUMBER: RN100542281

PERMIT NUMBER: WQ0000391000

DOCKET NUMBER:

COUNTY: HARRIS

PRINCIPAL NAME: EQUISTAR CHEMICALS LP

CN NUMBER: CN600124705

NAME: Elizabeth Hidalgo

EMAIL: elizabeth.hidalgo@harriscountytexas.gov

COMPANY: Harris County Attorney's Office

ADDRESS: 1019 CONGRESS ST
HOUSTON TX 77002-1700

PHONE: 7132745394

FAX:

COMMENTS: Please see attached for Harris County Attorney's Office comment.



OFFICE OF THE
HARRIS COUNTY ATTORNEY
CHRISTIAN D. MENEFEE

January 19, 2024

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of Air, MC 122
PO Box 13087
Austin, TX 78711-3087

RE: Equistar Chemicals, LP, Texas Pollutant Discharge Elimination System Permit No. WQ0000391000

Dear Ms. Gharis,

Harris County Attorney's Office (HCA) appreciates the opportunity to comment on Equistar Chemicals' (Applicant) application to amend Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0000391000 (EPA I.D. NP. TX0003531) to authorize removal of monitoring and daily maximum concentration limit for total aluminum from Outfalls 003, 003A, 003B, 003C, and removal of monitoring and daily maximum concentration limit for total zinc from Outfall 004. This facility is located at 8280 Sheldon Road, Channelview in Harris County, Texas 77530.

Generally, HCA is concerned that limitations are being removed that are currently beneficial for the environment and help to prevent future issues. HCA asks that Applicant provide more data supporting the conclusion that the removal of limitations and monitoring is appropriate and / or necessary.

For example, Applicant requests to remove monitoring and limits for total zinc at Outfall 004. Applicant claims that the outfall average is heavily skewed by two high values (0.669 mg/L, 0.731 mg/L) that occurred in 2022 after a period of severe drought. Further, Applicant claims that extremely dry conditions during the drought could have produced dusty soil conditions such that rainfalls immediately following carried much higher loads of soil particulates and that zinc is naturally occurring in the area soils.

However, Harris County has experienced similar drought conditions in the months during and since this application was made. Thus, now appears to be an inappropriate time to change reporting limits. More data taken during more typical rain patterns might be needed to support Applicant's claim. Until such time, this requirement should not be removed.

Applicant is also requesting to remove monitoring for total zinc at Outfall 003 based on, according to the Applicant, the TCEQ practice of including a monitoring requirement in a permit if the average concentration in the discharge is more than 70% of the daily average water quality-based effluent limit (WQBEL). HCA asks that TCEQ clarify what standard Applicant is referring to and what documents that practice is laid out in.

HCA appreciates the opportunity to comment. If you have any questions, please reach out to elizabeth.hidalgo@harriscountytexas.gov.

Sincerely,

CHRISTIAN D. MENEFE
Harris County Attorney

JONATHAN G. C. FOMBONNE
First Assistant County Attorney

TIFFANY S. BINGHAM
Managing Counsel, Affirmative
Litigation,
Environmental & Compliance

SARAH J. UTLEY
Division Director, Environmental


Elizabeth Hidalgo
Assistant County Attorney
Environmental Division

TPDES PERMIT NO. WQ0000391000

**APPLICATION BY
EQUISTAR CHEMICALS, LP
FOR TPDES PERMIT
NO. WQ0000391000**

**§
§
§
§**

**BEFORE THE
TEXAS COMMISSION
ON ENVIRONMENTAL
QUALITY**

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director (ED) of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Public Comment (Response) on the application for a renewal of Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0000391000 by Equistar Chemicals, LP and on the Executive Director's preliminary decision. As required by Title 30 of the Texas Administrative Code (30 TAC) Section (§) 55.156, before this application is approved, the ED prepares a response to all timely, relevant and material, or significant comments. The Office of the Chief Clerk received timely comments from Elizabeth Hidalgo of the Harris County Attorney's Office (HCA) and Douglas R. Stewart. Mr. Stewart's comments included an attachment which contained comments he previously submitted on a separate application for TPDES Permit No. WQ0002927000. Mr. Stewart has requested that those comments be addressed in this Response. This Response addresses all timely public comments received, whether or not withdrawn.

If you need more information about this permit application or the wastewater permitting process, please call the TCEQ Public Education Program at 1-800-687-4040. General information about the TCEQ can be found on the TCEQ web site at <http://www.tceq.texas.gov>.

I. BACKGROUND

A. Description of Facility

Equistar Chemicals, LP, which operates Equistar Chemicals Channelview Complex, a bulk and commodity organic chemicals and thermoplastics resins production facility, has applied for a major amendment of TPDES Permit No. WQ0000391000 to authorize the removal of a monitoring and reporting requirement and daily maximum concentration limit for total aluminum at Outfall 003; removal of a monitoring and reporting requirement for total zinc at Outfall 003; and removal of a monitoring and

reporting requirement and daily maximum concentration limit for total zinc at Outfall 004. The draft permit authorizes the discharge of treated organic chemical manufacturing process wastewater, Houston Technology Center (HTC) wastewater, auto shop wastewater, laboratory wastewater, cooling tower and boiler blowdown, sanitary wastewater, loading area and process area washdown, tank farm wastewater, heat exchanger blasting slab waste, utility wastewater, cooling tower and boiler maintenance wastewaters, water treatment wastewaters, water from land farm, steam condensate and blowdown, demineralization regeneration blowdown, methanol neutralization sump wastewater, hydrostatic test water, maintenance wastewater, groundwater from monitoring and recovery wells (on-site and off-site), process area stormwater runoff, construction stormwater, and process area stormwater from the adjacent co-generation facility at a daily average flow not to exceed 8,900,000 gallons per day via Outfall 001; process wastewater, stormwater, sanitary wastewater associated with a septic chlorinator on an intermittent and flow-variable basis via Outfall 101; sanitary wastewater associated with a septic chlorinator on an intermittent and flow-variable basis via Outfall 201; *de minimis* quantities from spill cleanups, utility wastewater, construction water, non-process area stormwater runoff, stormwater (from secondary containment structures), and post-first flush process area stormwater runoff on an intermittent and flow-variable basis via Outfalls 002 and 004; *de minimis* quantities from spill cleanups, utility wastewater, construction water, and stormwater runoff on an intermittent and flow-variable basis via Outfalls 003 (003A, 003B, 003C) and 005; HTC-area stormwater on an intermittent and flow-variable basis via Outfall 006; and stormwater associated with construction activities from a concrete batch plant on an intermittent and flow-variable basis via Outfall 007 (note: the concrete batch plant is not currently active and changes outfall location based on construction projects at the facility).

The facility is located at 8280 Sheldon Road, in the City of Channelview, Harris County, Texas 77530. The effluent is discharged via Outfalls 001 and 004 to an unnamed drainage ditch, thence to Wallisville Gully, thence to San Jacinto River Tidal; via Outfall 002 to Wallisville Gully, thence to San Jacinto River Tidal; via Outfall 005 directly to the San Jacinto River Tidal; via Outfall 003 to an unnamed drainage ditch,

thence to Harris County Flood Control District (HCFCD) ditch G103-03-02, thence to the San Jacinto River Tidal; and via Outfall 006 to HCFCD ditch G103-07-05, thence to San Jacinto River Tidal in Segment No. 1001 of the San Jacinto River Basin. The designated uses for Segment No. 1001 are primary contact recreation and high aquatic life use.

B. Procedural Background

The TCEQ received this application on March 1, 2023, and declared it administratively complete on June 16, 2023. The Executive Director completed the technical review of the application on March 31, 2023 and prepared a draft permit.

Equistar Chemicals, LP published the Notice of Receipt of Application and Intent to Obtain a Water Quality Permit (NORI) in the *Houston Chronicle dba Pasadena Citizen* on July 12, 2023, and the Notice of Application and Preliminary Decision (NAPD) in the *Houston Chronicle dba Pasadena Citizen* on February 28, 2024. Equistar Chemicals, LP also published an Alternative Language NORI and NAPD in the *Houston Chronicle dba La Voz* on July 12, 2023 and February 28, 2024, respectively. The public comment period for this permit ended on April 1, 2024. This application was filed after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill 801, 76th Legislature (1999) and Senate Bill 709, 84th Legislature, (2015), which are implemented by the Commission in its rules in 30 TAC Chapters 39, 50, and 55.

C. Access to Rules, Laws and Records

Please consult the following websites to access the rules and regulations applicable to this permit:

- to access the Secretary of State Website: www.sos.state.tx.us;
- for TCEQ rules in Title 30 of the Texas Administrative Code: www.sos.state.tx.us/tac/ (select “View the current Texas Administrative Code” on the right, then “Title 30 Environmental Quality”);
- for Texas statutes: <https://statutes.capitol.texas.gov/>;
- to access the TCEQ website: www.tceq.texas.gov (for downloadable rules in Adobe PDF format select “Rules and Rulemaking,” then “Current Rules and Regulations,” then “Download TCEQ Rules”);

- for Federal rules in Title 40 of the Code of Federal Regulations (CFR): http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl; and
- for Federal environmental laws: <https://www.epa.gov/laws-regulations>.

Commission records for this facility are available for viewing and copying at TCEQ's main office in Austin, 12100 Park 35 Circle, Building F, 1st Floor (Office of Chief Clerk), until final action is taken. In addition, some documents located in the Office of the Chief Clerk may be located on the Commissioners' Integrated Database at <https://www14.tceq.texas.gov/epic/eCID/>. The permit application for this facility, Executive Director's Preliminary Decision, and the proposed permit are available for viewing and copying at the North Channel Harris County Library, 15741 Wallisville Road, Houston, Texas.

The Executive Director determined that the draft permit, if issued, meets all statutory and regulatory requirements and is protective of the environment, water quality, and human health. If you would like to file a complaint about the facility concerning its compliance with the provisions of its permit or with TCEQ rules, you may contact the TCEQ Regional Office (Region 12) in Houston, Texas at (713) 767-3500 or the statewide toll-free number at 1-888-777-3186 to address potential permit violations. In addition, complaints may be filed online at <https://www.tceq.texas.gov/compliance/complaints> or by sending an email to complaint@TCEQ.state.tx.us. If an inspection by the Regional Office finds that the facility is out of compliance, the facility may be subject to enforcement actions.

II. COMMENTS AND RESPONSES

COMMENT 1:

HCA expressed its concerns about the amendment to remove limitations from the permit, specifically the removal of the monitoring requirements for zinc. HCA contends that the existing terms of the permit are beneficial for the environment and help to prevent future issues. HCA has requested more data supporting the conclusion that the removal of limitations and monitoring is appropriate and/or necessary.

RESPONSE 1:

The Applicant requested the removal of the monitoring and reporting requirement and the daily maximum concentration limit for total aluminum from Outfall 003. This request was made based on the findings of an aluminum source study conducted by the Applicant which demonstrated that significant sources of aluminum in the discharge are naturally occurring from soil particles carried in by stormwater. This study was submitted to TCEQ on January 11, 2022, and approved on March 3, 2023.

In accordance with anti-backsliding in CWA 402(o)(2)(b)(i), a permit may be renewed, reissued, or modified to contain a less stringent effluent limitation applicable to a pollutant if information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance. The submission of a TCEQ-approved aluminum study that demonstrates that significant sources of aluminum in the sampled water are not the result of the Applicant's discharge meets this requirement. Therefore, the monitoring and reporting requirement and the daily maximum concentration limit for total aluminum was removed from Outfall 003.

In regard to zinc, however, the Applicant's request to remove monitoring and reporting requirements and effluent limitations from Outfalls 003 and 004 was denied as Discharge Monitoring Report (DMR) data indicating that the average concentration of zinc in the discharge is less than 70% of the daily average WQBEL is not sufficient evidence to exempt a permittee from anti-backsliding regulations under CWA 402(o)(2).

COMMENT 2:

Douglas R. Stewart expressed concern that the permit, if issued, will increase the discharge rate by approximately 20%.

RESPONSE 2:

This permit action is for a major amendment without renewal with no request from the Applicant to increase the previously permitted discharge rate. As such, the rate of discharge from this facility remains unchanged from the rate currently authorized under the existing permit.

COMMENT 3:

Douglas R. Stewart expressed concern over the potential difference in water hardness of the input water to the facility and the water hardness values of Bear Lake. Additionally, he wanted to know where the input water to the facility is coming from.

RESPONSE 3:

Water hardness of a receiving water body is taken into consideration when calculating the water-quality based effluent limits (WQBELs) of a permit. For Outfalls 001, 002, 003, and 004, a site-specific hardness value of 147 mg/L was used. This value was developed for Lyondell's Channelview Complex-South (WQ0002927000) which discharges into a drainage ditch similar to the unnamed ditches used by the Applicant and were, therefore, considered more representative of the immediate receiving water bodies than Segment No. 1016. Based on this value and other relevant inputs [e.g., effluent flow, the segment-specific value for total suspended solids (TSS), estimated effluent percentages, criteria outlined in the Texas Surface Water Quality Standards (TSWQS), and partitioning coefficients for metals], the permit writer calculated the daily average and daily maximum effluent limitations for the protection of aquatic life. Analytical data reported in the Applicant's application were screened against these calculated WQBELs. Additionally, the limits in the existing permit were compared to the calculated WQBELs to determine whether the existing limits were still protective. The existing limits were determined to still be protective of aquatic life.

Additionally, in accordance with 30 Texas Administrative 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. A Tier 1 antidegradation review preliminarily determined that existing water quality uses will not be impaired by this permit action, and numerical and narrative criteria to protect existing uses will be maintained. A Tier 2 review preliminarily determined that no significant degradation of water quality is expected in San Jacinto River Tidal, and that existing uses will be maintained and protected. As such, the discharge from this facility is not expected to have a significant impact on the hardness value of the receiving water body.

The source of a facility's input water is typically only considered when determining whether a facility's use of cooling water is subject to Section 316(b) of the CWA or 40 CFR Part 125, Subpart J. This facility obtains water from the City of Houston, a public water system (PWS No. TX1010013), for cooling purposes. Therefore, it is not subject to Section 316(b) of the CWA or 40 CFR Part 125, Subpart J. The source of input water for the facility's industrial processes is not considered during the permitting process as TPDES permits are limited to the regulation of industrial wastewater discharge.

COMMENT 4:

Douglas R. Stewart expressed his concern that he may lose revenue in properties that he owns within the area as a result of the discharge.

RESPONSE 4:

TWC Chapter 26 and applicable wastewater regulations do not authorize TCEQ to consider issues outside the permitting process such as property values or loss of revenue. However, the permit does not limit the ability of an individual to seek legal remedies against the Applicant regarding any potential trespass, nuisance, or other causes of action in response to activities that may result in injury to human health or property or that may interfere with the normal use and enjoyment of property.

COMMENT 5:

Douglas R. Stewart expressed his concern about health impacts from contact with the wastewater discharge.

RESPONSE 5:

TCEQ is responsible for the protection of water quality with federal regulatory authority over discharges of pollutants to Texas surface water, with specific exceptions for oil and gas exploration and development activities. The TCEQ has a legislative responsibility to protect water quality in the State of Texas and to authorize wastewater discharge TPDES permits under Texas Water Code (TWC) Chapter 26, and 30 TAC Chapters 305, 307 and 309, including specific statutes regarding wastewater treatment systems under 30 TAC Chapters 217 and 309.

The proposed draft permit was developed in accordance with the Texas Surface Water Quality Standards to be protective of water quality, provided that the Applicant operates and maintains the proposed facility according to TCEQ rules and the proposed permit's requirements. The methodology outlined in the *Procedures to Implement the Texas Surface Water Quality Standards* (IPs; June 2010) is designed to ensure compliance with the TSWQS (30 TAC Chapter 307).

Specifically, the methodology is designed to ensure that no source will be allowed to discharge any wastewater that: 1) results in instream aquatic toxicity; 2) causes a violation of an applicable narrative or numerical state water quality standard; 3) results in the endangerment of a drinking water supply; or 4) results in aquatic bioaccumulation that threatens human health.

As part of the application process, TCEQ staff must determine the uses of the receiving waters and effluent limits that are protective of human health. In order to achieve the goal of maintaining a level of water quality sufficient to protect existing water body uses and human health, the proposed permit contains all applicable effluent limitations designed to restrict the potential impact of the discharge on the receiving waters and human health.

In accordance with 30 TAC § 307.5 and the IPs, an antidegradation review of the receiving waters was performed. A Tier 1 antidegradation review preliminarily determined that existing water quality uses will not be impaired by this permit action and numerical and narrative criteria to protect existing uses will be maintained. A Tier 2 review preliminarily determined that no significant degradation of water quality is expected in San Jacinto River Tidal, which was identified as having high aquatic life use. Existing uses will be maintained and protected. The preliminary determination can be reexamined and may be modified if new information is received.

CHANGES MADE TO THE DRAFT PERMIT IN RESPONSE TO COMMENT

No changes to the proposed permit were made in response to comments.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel, Executive Director

Charmaine Backens, Deputy Director
Environmental Law Division

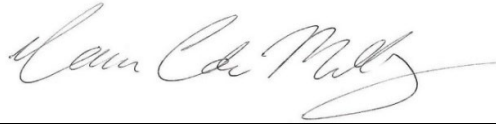


Harrison Cole Malley, Staff Attorney
Environmental Law Division
State Bar No. 24116710
P.O. Box 13087, MC 173
Austin, Texas 78711-3087
512-239-1439

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on July 15, 2024, the “Executive Director’s Response to Public Comment” for the application by Equistar Chemicals, LP for TPDES Permit No. WQ0000391000 was filed with the Texas Commission on Environmental Quality’s Office of the Chief Clerk.



Harrison Cole Malley, Staff Attorney
Environmental Law Division
State Bar No. 24116710