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Texas Commission on Environmental Quality 12100 Park 35 Circle Austin, TX 78753

Allan R Berger
PO Box 277
604 N 2<sup>nd</sup> Street
Port O' Connor, Texas 77982
allanrberger@comcast.net
713-829-2852

Submitted electronically to IPCOMMNT@tceq.texas.gov

Regarding proposed changes in the permitting and enforcement of plastics manufacturing and processing facilities

Sirs.

As a coastal resident, avid fisherman and involved conservationist I am deeply concerned about increasing plastic pollution in the marine environment. As TCEQ considers updates to Industrial Wastewater Permit Application (TCEQ 10055), 30 TAC Ch. 307 for individual stormwater permits and the Multi-Sector General Permit, and Investigator Guidance, I urge TCEQ to strengthen regulations as described below:

- clarify that TPDES permits do not authorize any amount of plastic pellets, flakes, fluff and powder to be discharged into receiving waters.
- include all transporters, bulk terminal operator and recycling facilities that handle, transport or dispose of preproduction plastic.
- regulate the discharge of all plastics less than 5 millimeters in size, including pellets, flakes, fluff and powder, regardless of whether they sink or float in water.
- require thorough testing of outfalls and public disclosure of results.

Thank you for the opportunity to comment.

Sincerely, ARBerger

Allan R. Berger