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CONSERVATION & PROTECTION OF MARINE LIFE

6919 Portwest Drive, Suite 100 | Houston, Texas 77024  
p 713.626.4222 | f 713.961.3801 | CCATexas.org

3/18/26

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

Re: Comments and Request for Public Meeting — TPDES Permit No. WQ0000447000

Dear Sir or Madam,

The Coastal Conservation Association — Texas (CCA Texas) submits these comments on the TPDES permit renewal application by Dow Hydrocarbons and Resources LLC (CN606209690) and Union Carbide Corporation (CN601688781) for Permit No. WQ0000447000.

CCA Texas is a nonprofit marine conservation organization representing 70,000 recreational anglers and coastal outdoor enthusiasts. Our mission is to conserve, promote, and enhance coastal resources for the benefit and enjoyment of the public.

We request that TCEQ hold a public meeting on this proposed permit renewal. The applicants' amendment requests for a change to the permit language requiring no discharge of floating solids other than trace amounts. Because the proposed changes could have broader, industry-wide implications and affect how floating solids are addressed in discharge monitoring & compliance, we believe a public meeting is warranted. Additionally, the public meeting will provide an opportunity for the applicants and TCEQ to fully explain:

- How the proposed monitoring consolidations and reporting changes will protect water quality,
- The specific intent and practical effect of the requested permit language changes (particularly the floating solids clarification), and
- Any technologies, operational controls, or additional safeguards the facility uses or could implement to prevent accidental releases of floating solids into nearby waterways.

Given the significant interest from recreational anglers and the coastal community, a public meeting will allow meaningful stakeholder input and ensure transparency about the permit's expected environmental outcomes.

Thank you for your consideration.

Sincerely,

*Shane Bonnot*

Shane Bonnot  
Advocacy Director, CCA Texas