



SIERRA CLUB

LONE STAR CHAPTER

Office of the Chief Clerk, MC 105
Texas Commission on Environmental Quality
PO Box 13087
Austin TX 78711-3087

April 10, 2026

Request by Sierra Club for a Public Meeting on Dow Hydrocarbons and Resources LLC and Union Carbide Corporation's TPDES Permit Amendment (WQ0000447000)

Dear Office of the Chief Clerk,

On behalf of more than 21,000 Sierra Club members and supporters, including 480 Texans who signed the petition to Texas Commission on Environmental Quality (TCEQ) attached to this letter, the Sierra Club Lone Star Chapter respectfully requests TCEQ hold a public meeting on Dow's permit amendment application - TPDES #WQ0000447000 - before any further action on this application is taken.

This request reflects significant public concern regarding the proposed permit amendment, which could have far-reaching implications for how pre-production plastic pollution is addressed in Texas. In addition to signing the petition below, more than 200 Texans also submitted personal messages expressing their concerns. ***We strongly encourage TCEQ to review these comments to better understand the level of public interest in this issue.***

Pre-production plastics, including pellets, powders, and flakes, are a form of microplastic pollution that can persist in the environment for decades. Once released, they are extremely difficult, if not impossible, to remove. These materials are known to be ingested by fish, birds, and other wildlife, and can adsorb other pollutants. Over time, they can move up the food chain, creating potential pathways of exposure for people, including through seafood consumption.

Emerging research increasingly links the presence of microplastics in the human body to heightened risks of cardiovascular diseases and other life-threatening health conditions.¹

A public meeting would provide an important opportunity for community members, stakeholders, and experts to better understand the proposed changes and share their perspectives before any decisions are made. **We respectfully request TCEQ to grant a public meeting on this permit application prior to making any determinations.**

Thank you for your consideration.

Respectfully,

Evgenia Spears, Ph.D.
Water Program Coordinator
Sierra Club Lone Star Chapter

¹ Marfella, R. M. et al. (2024). Microplastics and nanoplastics in atheromas and cardiovascular events. (DOI: [10.1056/NEJMoa2309822](https://doi.org/10.1056/NEJMoa2309822))

Petition to TCEQ from 480 Texans Requesting a Public Meeting (TPDES #WQ0000447000)

RE: Reject Dow's request to legalize plastic pollution

Dear Commissioners,

I am writing to urge the Texas Commission on Environmental Quality to reject Dow Chemical's request to amend its wastewater permit.

Dow is asking TCEQ to weaken long-standing permit language that limits plastic pollution in wastewater discharges. Approving this request could effectively authorize the discharge of plastic pellets and other plastic materials into waters that flow into San Antonio Bay and the Gulf of Mexico.

Plastic pellets and microplastics pose serious threats to marine ecosystems, wildlife, and coastal communities. Allowing a seemingly infinite amount of plastic pollution would set a dangerous precedent for other plastics facilities in Texas and across the Gulf Coast.

Dow's facility has already been accused of repeated pollution violations. Instead of weakening environmental safeguards, TCEQ should ensure that companies comply with existing water quality standards. If Texas leads the nation in plastics production, it should also lead the nation in preventing plastic pollution.

I urge TCEQ to deny Dow's permit amendment request and prioritize the protection of Texas waters and coastal ecosystems. I also request that TCEQ conduct a public meeting on the permit amendment application before any further action is taken so that communities have an adequate opportunity to provide public input. .

Thank you for your time.

Signed By	480 Texans
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