

From: Lois Huff <>

Sent: Monday, August 10, 2020 4:11 PM

To: IPCOMMNT

Subject: Plastics Prohibition. TCEQ rulemaking changes Due Aug 10 5PM. Pre-production plastics.

Plastics are a major problem, and preproduction plastics are due to become even more of a problem due in part to projected declining oil costs resulting in projected increased plastic production. The more I hear about plastic pollution, finding plastic in animals, on beaches, on roads, etc. the more convinced I become that serious changes need to be made immediately at a minimum preventing any additional plastics from escaping into the environment.

It is important to prevent all future pre-production plastic releases, even those too small to be visible to the naked eye. If we limit regulation to only visible plastics it is likely manufacturers will simply change manufacturing facilities to produce smaller pellets, flakes or fluff.

Employees at manufacturing facilities need to understand both the harmful impacts of plastic releases to the environment, and their important role in following Best Management Practices, perhaps providing them with a plastic pollutants accidental release hotline to be used immediately upon discovering a problem, before or at the same time as notifying management, then a requirement to document clean up measures along with the plan to prevent future spills, leaks or other escapes.

The compliance period and ability of TCEQ to reopen permits during permit time are important features. Allowing three years additional time to comply with discharge requirements seems overly generous to potential polluters. Perhaps production should stop until discharge requirements (zero discharges) can be met; preventing is cheaper than cleaning up. If additional time is permitted, then strict clean up requirements must also be included, with no time limit on the financial responsibility for cleaning up and spills or leaks that occurred before and during the compliance period.

The public and future residents and citizens and tourists count on you to provide the best environmental protection you can, and help us get started on cleaning up the damages already done. We can not afford to allow clean up costs to be postponed for future generations to deal with; the cost of preproduction plastics should include the estimated costs of environmentally friendly disposal at the end of their life cycle.

Thank you,

Lois Huff

361-774-1500

5818 St. Andrews Drive

Corpus Christi, TX 78413