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Sent: Friday, August 7, 2020 1:37 PM

To: IPCOMMNT

Subject: Input on Plastics

1. Please provide input on the following proposed definition of plastic (taking into consideration the focus on pre-production plastic): Plastic means all forms of visible plastic produced, received, or handled at the permittee's facility, including but not limited to: pellets, powder and flakes. This typically covers our definition. We have also included "able to be captured by photographic means" in some of our code.
2. TCEQ's intent is to regulate plastics visible to the naked eye, but please provide input on class sizes for our review. Additionally, please provide input on the use of the word "visible" in the definition above. Being able to document with a photo.
3. In addition to the prohibition, permittees with stormwater outfalls under the Multi-Sector General Permit or an individual permit will be required to develop a comprehensive set of Best Management Practices to include within their Stormwater Pollution Prevention Plan. Please provide input to assist with the identification of effective BMPs and potential sources of information such as "Operation Clean Sweep". During MSGP inspections we have also recommended installation of barriers such as silt fences, asked for sweeping to be incorporated in the BMPS and maintenance schedules, and also containment in loading dock areas and silo areas.
4. Please provide input on additional requirements such as: outfall and receiving water inspections, notification of spills and unauthorized discharges to Regional Office, recovery of released materials from receiving waters, and clarification that the point of compliance for the prohibition on the discharge of plastic is at the final outfall. As these facilities often have pellets everywhere our focus is mostly on keeping the raw material inside. So we do focus on outfall, loading docks, doorways to production areas, silos or other storage vessels in our inspections. If the silo is on the roof or elevated above the roof line we also ask for them to include inspections of the gutters as part of their quarterly inspections.
5. TCEQ is requesting stakeholder input regarding additional time to comply with the prohibition on the discharge of plastic. The Texas Surface Water Quality Standards allow up to a three-year compliance period. TCEQ is proposing that requests for a compliance period must justify the need for additional time including a construction schedule to install new control structures or retrofitting existing systems to achieve compliance. If approved, the compliance period will include submission of quarterly progress reports. We do not see an issue with

that. Construction can be complex and expensive, temporary BMPS such as frequent sweeping can address on a temporary basis while a permanent fix is in the works.

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