



Weston Solutions, Inc.
5301 Southwest Parkway, Suite 450
Austin, TX 78735
512-651-7100
WestonSolutions.com



21 January 2020

Texas Commission on Environmental Quality
Water Quality Section
Waste Permits Division
P.O. Box 13087
12100 Park 35 Circle, Building F
Austin, TX 78711-3087

Re: Transmittal of Revision to TPDES Renewal and Major Amendment Application
WQ0002436-000
RN 100218973 Formosa Point Comfort Plant
CN 600130017 Formosa Plastics Corporation, Texas
CN 602650954 Formosa Utilities Venture, Ltd.

Dear Ms. Luxemburg:

Weston Solutions, Inc. (WESTON[®]) is transmitting revisions to the permit application previously submitted and declared administratively complete on 27 September 2019 for the above-referenced facility on behalf of Formosa Plastics Corporation, Texas (FPC-TX). One original and three copies are being transmitted.

The revision includes the following:

- Rescind our request for Other Requirement 28 and 29, and replace the Major amendment request with:
 - Outfalls 001, 101, 201, 002–009, 012, and 014. We are requesting a modification of Effluent Limitation and Monitoring Requirement 3 so that it reads as follows: ***“There shall be no discharge of visible foam or floating solids in other than trace amounts, no discharge of visible oil, and zero (0) discharge of Plastics. “Plastics” means visible plastic pellets, flakes or powder produced at the Formosa Point Comfort Plant.”***
 - Outfalls 002–009, 012 and 014. We are requesting for “Volume: Intermittent and Flow Variable”, that a reference to Other Requirement 28 be added as follows: ***“Volume: Intermittent and Flow Variable – See Other Requirement 28.”***
- Add New Other Requirement 28: ***Authorized waste streams may not be discharged unless more than 6.8 inches of rain falls in a 24-hour period or a cumulative of 10.5 inches in 7 days or less as measured by the rain gauge maintained by the permittee. The permittee will notify TCEQ within 24 hours by phone or facsimile of a discharge and include the rainfall amount and outfall number. This requirement will be effective upon the earlier of the construction of the***



infrastructure necessary to comply with this requirement or January 2024, whichever comes first.

The permittees are currently designing modifications to the treatment process to achieve compliance with the major amendment requests. When designs to the system are final, updated application materials related to the treatment process and any changes to the compliance point will be submitted.

Should you have any questions regarding this submittal, please call me at (512) 651-7104.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in blue ink that reads "N. L. Koch". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nancy L. Koch, P.E.
Project Manager

Attachment: Revised Technical Report, Section 13 Major Amendment Requests

cc: Matt Brogger, Formosa
Travis Clawson, Formosa

**REVISED TECHNICAL REPORT
SECTION 13 MAJOR AMENDMENT REQUESTS**

Note: Items 12, 13, and 14 are required only for **existing permitted** facilities.

13. MAJOR AMENDMENT REQUESTS (Instructions, Page 46)

Are you requesting a major amendment of an existing permit?

Yes No

If **yes**, list each specific request and provide discussion on the scope of any requested permit changes. If necessary, provide supplemental information or additional data that will support the request.

1. We are requesting to add a new stormwater outfall, Outfall 014. We are requesting to discharge non-process area storm water, hydrostatic test water, fire water, non-contact condensates, non-contact wash water, and potable water. This outfall will serve the new LDPE unit and Utility III.
2. Outfalls 001, 101, 201,002-009, 012, and 014. We are requesting a modification of Effluent Limitation and Monitoring Requirement 3 so that it reads as follows: "There shall be no discharge of visible foam or floating solids in other than trace amounts, no discharge of visible oil, and zero (0) discharge of Plastics. "Plastics" means visible plastic pellets, flakes or powder produced at the Formosa Point Comfort Plant."
3. Outfalls 002-009, 012 and 014. We are requesting for "Volume: Intermittent and Flow Variable", that a reference to Other Requirement 28 be added as follows: "Volume: Intermittent and Flow Variable – See Other Requirement 28."
4. Our proposed language for Other Requirements 28 follows: Authorized waste streams may not be discharged unless more than 6.8 inches of rain falls in a 24 hour period or a cumulative of 10.5 inches in 7 days or less as measured by the rain gauge maintained by the permittee. The permittee will notify TCEQ within 24 hours by phone or facsimile of a discharge and include the rainfall amount and outfall number. This requirement will be effective upon the earlier of the construction of the infrastructure necessary to comply with this requirement or January 2024, whichever comes first.

14. MINOR MODIFICATION REQUESTS (Instructions, Page 47)

Are you requesting any minor modifications to the permit? Note: see the instructions for an exclusive list of changes considered as minor modifications.

Yes No

If **yes**, list and discuss the requested changes.

Revise the authorization of "non-contact steam condensate" to "non-contact condensate" or "clean condensates" for Outfalls 002-013.

Modify Other Requirement 3 to revise the submittal date of the annual report. Currently the requirement is for "before the anniversary of the current permit issuance date". Upon issuance of the current permit, analytical results were not available in time to prepare the annual report. We are requesting that the annual report be submitted September 30 of each year, same as the annual groundwater monitoring report. Currently there is insufficient time to obtain receipt of tissue data from Texas A&M to meet the deadline in Other Requirement 3.

15. MINOR AMENDMENT REQUESTS (Instructions, Page 47)

Are you requesting any minor amendments to the permit?

Yes No

If **yes**, list and discuss the requested changes.