

***** TAKE ACTION *****

TPC Group LLC's Butadiene Expansion Project

TPC GROUP AIR POLLUTION PERMIT AMENDMENT REQUEST

TPC Group LLC ("TPC") has [submitted three air permit applications](#) (Permit Nos. 22052, 46307, and 46426) to increase butadiene production at the company's Houston Plant, located at **8600 Park Place Boulevard**.

The company has a **history of chemical fires and illegal releases of health-harming air pollution** and has not openly informed the public about the implications of their permit amendment request.

The Texas Commission on Environmental Quality (TCEQ) should hold a public meeting to allow the public to learn more and ask questions about the applications.

How does this permit application affect me?

Clean air is not available to every Texan.

- Corporations release harmful chemicals, including known carcinogen 1,3-butadiene, into the air.
- 1,3-butadiene is highly toxic and used in the production of synthetic rubber. It can cause cancer and a host of neurological damages.
- People who live on Houston's heavily industrialized east side, in particular, are at a higher risk for developing asthma and cancer.
 - 1,3-butadiene levels are highest within two miles of the Ship Channel. Compared to relatively affluent neighborhoods on Houston's west side, these levels are more than **150 times greater** in Manchester and Harrisburg according to [the Union of Concerned Scientists](#).
 - Children who live along the Ship Channel are 56 percent more likely to develop a kind of leukemia than those who live 10 miles away, [UTHealth School of Public Health found](#).
- TPC Group, one of the state's worst corporate polluters, wants to release **even more** toxics into the Houston air, which will exacerbate health harms to families living nearby.

TPC has a track record of illegal air pollution releases.

- TPC Group is a "high priority violator" of federal environmental protections with a history of chemical fires and illegal releases of harmful air pollution. This means that the potential for affecting public health is high.
- In 2019, TPC Group's Port Neches facility caught fire and exploded, forcing a 50,000 person evacuation on the Eve of Thanksgiving. The plant continued **illegally leaking**

butadiene and other harmful pollutants into the surrounding neighborhoods for months, according to the company's own report to the state.

- TPC Group's Houston facility – the one on the table for expansion – illegally released **500 pounds** of butadiene in 2019.
- TPC Group's Houston facility is located near majority Latino communities who have historically been denied full access to the tools of government protection and wider public concern.
 - Galena Park, Manchester and Pasadena face unequal burdens as corporations have treated them as toxic dumping grounds.
 - In this densely populated area, an explosion similar to the one in Port Neches in 2019 would be catastrophic.

How can I comment on this permit amendment?

1.) Request a Public Meeting

We encourage you to contact [State Senator Carol Avarado](#) and [State Rep. Mary Ann Perez](#) who represent the communities where the plant is located, and demand that they ask TCEQ to organize a public meeting:

Senator Carol Alvarado, District 6

- [Use this form to email](#) the Office or email carol.alvarado@senate.texas.gov
- Call the Office: (713) 926-6257 (District Office) | (512) 463-0106 (Capitol Office)

Rep. Mary Ann Perez, District 144

- [Use this form to email](#) the Office or email maryann.perez@house.texas.gov
- Call the Office: (713) 740-8153 (District Office) | (512) 463-0460 (Capitol Office)

2.) Submit comments directly to TCEQ

In addition, you can contact TCEQ directly and share your concerns about about TPC Group's permit #22052 at <https://t.co/1FpvFfq2Bz?amp=1>

Before approving the permit amendment, the TCEQ should:

1. Require TPC Group to address and correct ongoing violations at its Houston and Port Neches facilities before issuing more permits.
2. Revise the Draft Permit to include monitoring conditions that assure compliance with ALL pollution control requirements established by the permit, including destruction and removal efficiency requirements (the effectiveness of the pollution control technology) for equipment such as the oxidation catalyst. This is crucial to quantifying and

understanding the **actual** emissions from the butadiene plant expansion rather than relying on nominal engineering estimates.

3. Because TPC's wastewater treatment facility is being modified to accommodate waste streams from the expansion project, do not issue the permit until TPC demonstrates that it will use pollution controls consistent with federal Lowest Achievable Emission Rate requirements.
4. The TCEQ must require TPC to make information over crucial application representations, currently withheld from the public and resubmit notice of the draft permit. To date the TCEQ has improperly allowed TPC to withhold such information from public scrutiny, because the company claims that it is protected by state-law provisions covering trade secrets and other confidential business information. As a matter of federal law, these representations are public information and must be publicly available to allow for full public participation in this case

Everyone's voice matters.

- The permitting process is intentionally opaque because **corporations want uncontested approvals to save time and money.**
- Those who need the most protection from air pollution must be able to have a say in their air quality but often do not because
 - TCEQ functionally excludes primarily Spanish speakers from the conversation because notices about permits, hearings, meetings and proposed changes to environmental regulations are nearly exclusively in English.
 - TPC Group printed a notification of its permit applications in dense legal language, only in English, on the back of a Pasadena newspaper, excluding the rest of the affected east side.

Texas has a duty to protect public health and safety.

- State leaders and the Texas Commission on Environmental Quality (TCEQ) cannot sit on their hands while communities face unacceptable cancer risks from breathing corporate pollution every day.
- **It is essential that the TCEQ listen and use the full extent of their authority to reduce toxic air pollution and protect public health.**

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