

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**280 ENVIRONMENTAL, PUBLIC HEALTH, INDIGENOUS, AND COMMUNITY NON-
GOVERNMENTAL ORGANIZATIONS,* (full list on pages i-iii)**

Petitioners,

vs.

**ANDREW WHEELER, ADMINISTRATOR, UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY,**

Respondent.

**PETITION TO REVISE THE CLEAN WATER ACT EFFLUENT LIMITATIONS
GUIDELINES AND STANDARDS FOR THE PETRO-PLASTICS INDUSTRY UNDER
THE 40 C.F.R. PART 419 PETROLEUM REFINING INDUSTRIAL CATEGORY
(CRACKING AND PETROCHEMICALS SUBPARTS) AND PART 414 ORGANIC
CHEMICALS, PLASTICS, AND SYNTHETIC FIBERS INDUSTRIAL CATEGORY**

Pollutant or pollutant property	NSPS	
	Maximum for any 1 day (mg/l)	Average of daily values for 30 consecutive days shall not exceed (mg/l)
The 126 priority pollutants (listed at 40 CFR Part 423, Appendix A)	(¹)	(¹)

¹ No detectable amount unless and until EPA can justify higher limits using best available demonstrated control technology.

Amend 419.26(e) and 419.36(e) to include runoff limitations that reflect Best Available Demonstrated Control Technology.

In sum, EPA must thoroughly review and revise its Part 414 and Part 419 Effluent Limitations Guidelines and Standards to reflect the best available science and technology and to protect human health and the environment from the petro-plastics buildout. It must adopt zero discharge limits for plastic and adopt the stringent standards for priority pollutants proposed here unless and until it can justify higher limits using best available demonstrated control technology.

VI. Severability

If any provision of this petition is found to be invalid or unenforceable, the invalidity or lack of legal obligation shall not affect other provisions of the petition. Thus, the provisions of this petition are severable.

VII. Conclusion

The petrochemical industry is embarking on a massive expansion of plastics facilities that will drastically increase plastic production in this country and abroad. The associated wastewater and stormwater pollution from these plants is expected to skyrocket in tandem, jeopardizing wildlife, aquatic ecosystems, and surrounding communities. EPA has a duty to minimize water pollution and ensure that toxic chemicals do not harm human health and the environment. Accordingly, Petitioners respectfully request that EPA grant this petition and comply with its overdue obligation under the Clean Water Act to update the Effluent Limitation Guidelines and Standards for wastewater and stormwater discharges from petro-plastics facilities.

EPA must: (1) prohibit the discharge of any plastic pollution in stormwater and wastewater; (2) prohibit the discharge of toxic pollutants in wastewater from new facilities; (3) promulgate limitations for wastewater pollutants of concern that are not currently regulated; (4) update the Effluent Limitation Guidelines and Standards to reflect scientific and technological advancements in the decades since their last revision; and (5) ensure all plastics facilities are covered by the updated BAT and NSPS effluent limitations. Granting these requests will allow