



**Gulf Coast Authority**

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January 7, 2021

Mr. Ken McQueen  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 6, Mail Code ORA  
1201 Elm Street, Suite 500  
Dallas, Texas 75270

Submitted via: <http://www.regulations.gov>. Docket No. EPA-R06-OW-2020-0608

RE: Comments on State of Texas Submittal to EPA of Request for Partial NPDES Program Authorization for Oil and Gas Discharges  
Docket No. EPA-R06-OW-2020-0608

Dear Mr. McQueen,

Gulf Coast Authority ("GCA") appreciates the opportunity to provide comments in support of the Texas Submittal to EPA of Request for Partial NPDES Program Authorization for Oil and Gas Discharges, 85 Fed. Reg. 76,073 (Nov. 27, 2020) Docket No. EPA-R06-OW-2020-0608.

GCA is a conservation and reclamation district created by the Texas Legislature in 1969 as a political subdivision of the State of Texas. It was first established as an instrumentality for developing a regional water quality management program, including provision of waste treatment and disposal of wastes in Chambers, Galveston, and Harris Counties. It can now build and operate facilities for treatment and discharge or reuse of waste statewide as well as provide for industrial water supply. GCA's mission is to protect the waters of the state of Texas through environmentally sound and economically feasible and technologically advanced regional waste management practices. GCA's current facilities include four treatment plants designed to treat specified types of industrial wastewaters including one in the heart of the Permian Basin, as well as one municipal facility treating primarily domestic waste. GCA facilities combined treat approximately fifty (50) million gallons per day of industrial wastewater from over ninety (90) customers.

GCA believes that the application for partial delegation enhances the GCA mission of protecting the waters of the State of Texas by consolidating NPDES permitting and enforcement under the TCEQ. It is GCA's belief that TCEQ is best positioned to perform permitting as it has the largest allocation of governmental staff

dedicated to permitting and water quality development in Region 6. In addition, through its established network of regional offices, it is in the best position to perform inspections, monitoring, and initiation of enforcement. The consolidation of NPDES permitting in Texas will have a secondary effect of optimizing the use of available governmental resources in the state.

GCA appreciates the opportunity to support the partial delegation. If you have any questions or desire additional information, please contact Leonard Levine at [llevine@gcatx.org](mailto:llevine@gcatx.org) 281-226-1124.

Sincerely,



Elizabeth Fazio Hale, J.D., LL.M.  
General Manager/CEO  
Gulf Coast Authority

EFH:LL/lb

cc: Lenard Levine