



## **CORPUS CHRISTI POLYMERS DESALINATION PLANT IS A DANGEROUS & RISKY PROJECT**

### **THE CC POLYMERS SITE WOULD WRECK THE BAY AKIN TO THE CLOSE BY INNER HARBOR SITE**

The Jan. 5th memo from Drew Molly recommended integrating the Corpus Christi Polymers (CCP) desalination plant into the city's water supply. However, the completion and operation of this CCP desalination plant would present many of the **same catastrophic risks as the Inner Harbor Seawater Desalination project.**

If completed, the CCP desalination plant would release **38 million gallons per day of salty discharge that would empty into Corpus Christi Bay.**<sup>1</sup> Contrary to the TCEQ's initial determination that this discharge will not lead to deleterious effects to sensitive aquatic life, local experts Dr. Scott Socolofsky and Dr. Kristin Nielsen have explained, in written reports, that **discharges in the Ship Channel would likely result in a dense plume of elevated salinity** extending along the bottom of the Inner Harbor channel and continuing into Corpus Christi Bay.<sup>2</sup> This type of dense salinity plume results in "**dead zones**" that are lethal to aquatic organisms of all kinds.<sup>3</sup> **Harming the health of the Bay would in turn harm the local fishing and tourism industries.**

### **CC POLYMERS WATER RIGHT PERMIT HAS EXPIRED & WASTEWATER PERMIT HAS BEEN CHALLENGED & ITS BACKERS HAVE WRITTEN OFF MUCH OF THEIR INVESTMENTS**

CC Polymers is relying on a water use permit initially given to the M&G Polymers plant at that site. However, on August 29, 2024 its **water right permit expired because it was not used within 10 years** which is a requirement for surface water right permits under Texas law. Some groups have already mounted legal challenges to CC Polymers' right to withdraw this volume of surface water.<sup>4</sup> Furthermore, the expired water right permit had an insufficient amount of water to run a 10 MGD desalination plant.

In addition, the TCEQ recently renewed the wastewater permit over the objections of a variety of community members. The **wastewater permit is subject to legal challenges.**<sup>5</sup>

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<sup>1</sup> See page 2 of [TPDES Permit No. WQ0005019000](#).

<sup>2</sup> See Memorandum to Perales, Allmon & Ice, P.C. from Scott A. Socolofsky, Ph.D. RE: "[Expected far-field conditions of desalination discharge plume for TPDES Permit No. WQ0005019000](#)" from July 1, 2024. See also Memorandum from to Perales, Allmon & Ice, P.C. Kristin Nielsen, Ph.D. RE: "[Corpus Christi Polymers LLC, Renewal of TPDES Permit No. WQ0005019000](#)" from July 8, 2024.

<sup>3</sup> See "[Corpus Christi's First Water-Desalination Plant Could Create 'Dead Zones,'](#)" Joe Pappalardo, Texas Monthly, December 12, 2024.

<sup>4</sup> See TCEQ Docket No. 2024-1415-WR "[TEXAS CAMPAIGN FOR THE ENVIRONMENT'S PETITION TO CANCEL CORPUS CHRISTI POLYMERS, LLC's WATER USE PERMIT NO. 12986A.](#)"

<sup>5</sup> See "[Hearing Request and Request for Reconsideration regarding the Application of Corpus Christi Polymers LLC for Renewal of TPDES Permit No. WQ0005019000 \(EPA ID No. TX0134635\)](#)" from Perales, Allmon & Ice, P.C. July 5, 2025 via TCEQ eComments.

Additionally, two of the three companies involved in CC Polymers have acknowledged financial difficulties with the facility.<sup>6</sup> Alpek, one of the three companies involved, has completely written off its \$557 million investment in the project and a second Indorama wrote off \$308 million of its investment. Along with Far Eastern Group, **these companies bought M&G Polymers' project for \$1.18 billion in 2018 but \$865 million has so far been written off.**

## **THE CITY SHOULD PURSUE WATER CONSERVATION & OTHER SAFER ALTERNATIVES**

A 2022 analysis by Autocase Economic Advisory determined that **desalination is by far the costliest water supply option for the region, as compared to water conservation measures and withdrawal from the Evangeline Aquifer**<sup>7</sup>. In times of increasing drought, any long-term solution for water security in the region must include conservation measures, especially for industrial customers which is the fastest growing water use sector.

**Members of the Corpus Christi City Council should oppose any partnership with CC Polymers because of the environmental impacts on Corpus Christi Bay.** Instead, the City Council should oppose any efforts by CC Polymers to obtain a new water right, urge the TCEQ to recognize that the water right has expired and should be considered cancelled, and oppose the renewal of its wastewater pollution permit. The council should pursue other strategies that prioritize water conservation and less damaging water supply strategies.

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<sup>6</sup> See presentation, "[Corpus Christi Polymers PET Resin Plant 'Pause' Approaches One-Year Anniversary.](#)" Energy Institute for Economics and Financial Analysis. August 2024.

<sup>7</sup> See "[Economic Analysis: Cost Benefit Analysis Study for Coastal Bend Water Supply Options,](#)" Autocase Economic Advisory. November 2022.