



Jim Fitterling, CEO & Chair
Dow Inc.
2211 HH Dow Way
Midland, MI 48674

Dear Mr. Fitterling,

I write to you today to urge Dow, and its subsidiary Union Carbide Corporation, to withdraw its request to weaken its existing permit language limiting ‘floating solids’ to trace amounts in its wastewater discharge, and instead adopt a zero-discharge standard prohibiting any release of plastic pellets, powder, or flakes from the Seadrift Operations Facility. The Victoria Barge Canal, which flows into San Antonio, Mission, and Guadalupe Bays, already contains well-documented and widespread plastic pollution. Any action short of zero discharge will worsen the environmental and public health crisis. Enclosed is a letter from Diane Wilson of San Antonio Bay Estuarine Waterkeeper, cosigned by 56 organizations including Waterkeeper Alliance, urging you to do the same.

Waterkeeper Alliance is a global movement uniting more than 300 community-based Waterkeeper groups around the world, focusing citizen action on issues that affect our waterways, from pollution to climate change. The Waterkeeper movement patrols and protects nearly six million square miles of rivers, lakes, and coastlines in the Americas, Europe, Australia, Asia, and Africa. In the United States, Waterkeeper Alliance represents the interests of more than 160 U.S. Waterkeeper groups and their more than one million members and supporters that live, work, and recreate in or near waterways across the country, many severely impaired by pollution.

Plastic pellet and powder pollution are not well regulated by the government, so it falls to citizen science efforts to track the scope of the problem. San Antonio Bay Estuarine Waterkeeper has collected a shocking amount of plastic pellets and powder floating in the water and on the banks of the Victoria Barge Canal. On a single day, and in one location in December 2025, the organization collected approximately two million pellets near Dow’s barge docks. Any further discharge of plastics into Texas’s waterbodies will exacerbate this severe environmental and public health emergency.

As recently as this month, the U.S. Environmental Protection Agency has noted the dangers of microplastics, such as the pellets and flakes found in the waterbodies near Dow’s facility in Seadrift. We urge you to retract your request, and instead adopt manufacturing and technological practices that will result in zero discharge of plastic waste.

Sincerely,

Marc Yaggi
CEO
Waterkeeper Alliance