TCEQ Public Meeting Form

Thursday, November 29, 2007

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2007 NOV 30 PM 2:58
CHIEF CLERKS OFFICE

City of Castroville
Proposed Permit TPDES
WQ0010952001

PLEASE PRINT:

Name: Mike + Rita Capp

Address: P.O. Box 459 1245 CR 4713

City/State: La Coste, TX Zip: 78039

Phone: (210) 889-8988 or (830) 538-2244

☐ Please add me to the mailing list.

Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

If yes, which one? We are w/in the 1 mile perimeter

IF YOU WANT TO GIVE FORMAL COMMENT PLEASE ✓ BELOW

☐ I wish to provide formal oral comments.

☒ I wish to provide formal written comments at tonight's public meeting.
(Written comments may be submitted at any time during the meeting)

Please give this to the person at the information table. Thank you.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

PAGE NO. | RECORDED BY

PROJECT

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OPA RECEIVED

PLANNING NOTES | COMMENTS

CHIEF CLERKS OFFICE

NOV 29 2007

AT PUBLIC MEETING

MICHAEL S. COPP & RITA R. COPP

WE ARE NOT APPOSED TO THE APPLIED FOR PERMIT. ~~IF~~ WE WOULD LIKE THE TCEQ TO SET THE PERMITTERS OF THE DISCHARGE FLUIDS TO BE CONSISTANT WITH ALL OTHER DISCHARGE SITES WITHIN THE STATE OF TEXAS. AND STRICT MONITORING OF SUCH DISCHARGE. WE WOULD ALSO LIKE THE CITY OF CASTROVILLE TO BE THE LEADER AND A ROLE MODEL FOR THE STATE OF TEXAS.

Michael S. Copp

Rita R. Copp

11/29/2007

MW

TCEQ Public Meeting Form

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City of Castroville
Proposed Permit TPDES
WQ0010952001

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2007 NOV 30 PM 2:55
CHIEF CLERKS OFFICE

PLEASE PRINT:

Name: Rodney Hitzfelder

Address: 3250 CR 471B

City/State: La Coste Zip: 78039

Phone: (210) 643-6660

☑ Please add me to the mailing list.

Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☐ No

If yes, which one? _____

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MWD
57152

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2008 JAN 24 AM 10: 12
CHIEF CLERKS OFFICE
OPA
JAN 24 2008
BY Bf

C/O City of Castroville Water Quality Permit # 10952001
Texas Commission on Environmental Quality
Office of Chief Clerk, Mail Code 105
P O Box 13087
Austin, Texas 78711-3087

Re: City of Castroville Water Quality Permit # 10952001

The Texas Commission on Environmental Quality held a meeting on November 29, 2007, in Castroville Texas, regarding the referenced matter so that local citizens could express their concerns and have questions answered.

Regrettably, the meeting was not well publicized and few Medina County citizens attended. Had there been adequate notice many more citizens, particularly those who live downstream from Castroville, including myself, would have been in attendance.

Recent scientific research has raised serious concern that even small parts of certain "emerging contaminants" can be very harmful to all animal life, including human. (see attached San Antonio Express News article).

Any decision regarding permitting the City of Castroville to pump effluent into the Medina River should take into consideration the past volatility of the city government. It is well known and documented that passed political misdeeds and operational mistakes should be considered in allowing this potentially disastrous situation to exist.

It is my understanding that there will be a "contested case hearing" by TCEQ at some future time. **I would like to know how and when the public will be notified of such a hearing and who will be permitted to appear in opposition to this proposed polluting of the Medina River.**

In addition to a written response to this letter you may e-mail your response to terrymonday@sbcglobal.net I look forward to hearing from you.

Terry Monday

N. Terry Monday
9950 FM 471 South
LaCoste, Texas 78039

The Castroville Anvil
1015 HWY 90 West
Castroville, Texas 78009

Attached is my letter to the Texas Commission on Environmental Quality regarding the City of Castroville Water Quality Permit #10952001.

I ask that you publish the letter so that other concerned Medina County citizens can be informed of this potential danger to the Medina River.

Thank you.

Terry Monday
9950 FM 471 South
LaCoste, Texas 78039

San Antonio Express-News (TX)

A Section Page 01A

Bits of chemicals in wastewater raising big questions

David Uhler EXPRESS-NEWS STAFF WRITER

Publication Date : December 9, 2007

High on a bluff overlooking the Medina River, Steve Clouse watches as a torrent of treated effluent from San Antonio's **biggest wastewater** plant cascades down a stair-stepped, concrete culvert to meet the stream.
A dead zone for many years until the city's Dos Rios Water Recycling Center cleaned up its act, the river below the discharge now is the home of several pollution-sensitive species of fish.

Like the caged canaries that used to be carried by coal miners to detect the presence of dangerous gases, the presence of the fish demonstrates the high quality of the treated **wastewater** released by Dos Rios, which can process up to 125 million gallons of raw sewage every day.

Clouse, the vice president of production and treatment for the San Antonio Water System, smiles and points at the gin-clear **wastewater** merging with the muddy brown water of the Medina.

"This is the best fishing spot in San Antonio," he said.

But is it really clean?

A growing body of scientific research has linked minute amounts of chemical compounds in treated **wastewater** to changes in aquatic animals ranging from lethargic feeding patterns and thyroid problems to increased female-to-male ratios and "intersex" male fish that develop eggs and female sex organs and no longer produce sperm.

These compounds, dubbed "emerging contaminants," include hormones, insect repellent, anti-bacterial soaps, fragrances and pharmaceuticals, such as the active ingredient used in antidepressants.

The amounts detected are tiny, typically measured in single parts per billion or trillion, the proverbial "drop in a swimming pool."

For years, the mantra of water experts has been "the solution to pollution is dilution."

Now, researchers aren't so sure. So far, they haven't found any connection between emerging contaminants and health problems in humans. But they have their hunches.

On average, sperm counts are down in males. Females are reaching puberty earlier. Scientists suspect that chemicals used in some cosmetics, deodorants and food packaging might be the culprits. Some of those same compounds are on the emerging contaminants short list.

Can extremely tiny doses of emerging contaminants cause major health problems?

Scientists, government officials and local water experts urge the public -- including

the media -- not to jump to conclusions.

"Over the next five years, we'll have a better understanding," said Dana Kolpin, a research hydrologist at the U.S. Geological Survey and lead author of a 2002 study of emerging contaminants that opened the floodgates of investigation across the nation. "It's so complicated, we won't know everything. But, I'd say, 'Be aware, stay tuned.'"

Effects unknown

There are few federal standards for emerging contaminant limits and testing methods. Beginning in January, the Environmental Protection Agency will monitor drinking water systems for 25 pharmaceuticals and endocrine-disrupting chemicals. An EPA study of sewage treatment plants also is on a fast track for completion in 2009.

"We're getting closer to establishing benchmarks and scientifically sound methodology for testing for emerging contaminants," said Ben Grumbles, the assistant administrator of the agency's Office of Water in Washington. "It's a priority area for us in terms of research and product stewardship."

At this point, however, science's ability to detect emerging contaminants still exceeds its knowledge of their effects.

"As we're evolving and expanding our research, we're trying to answer the 'so what?' question," Kolpin said. "Does this really mean anything to aquatic and terrestrial organisms and, ultimately, to human health?"

If there is a problem, human health and other activity helped cause it. Like all animals, humans excrete naturally occurring estrogen and testosterone through body waste. People also excrete hormones from other sources -- birth control pills, estrogen replacement therapy, even steroids.

When combined with antihistamines and aspirin, vitamins and Viagra, and all the other pharmaceuticals that humans consume -- only a fraction of which is absorbed by its users -- the concoction flushed down the nation's toilets is a potentially potent chemical cocktail.

Drinking-water sources, while not as vulnerable to emerging contaminants as treated wastewater, aren't totally immune, either.

"Certainly, it's there," said John Hoyt, an assistant general manager for the Edwards Aquifer Authority. "You have septic tanks operating on the recharge zone. Some of that leachate certainly makes it to the water table."

Presence established

Emerging contaminants, despite their name, aren't new. After flying under science's radar for years, they are "emerging" in the sense that scientists and the public gradually are learning about their existence and the problems they might cause.

Other researchers before Kolpin reported the first findings of emerging contaminants. But he and other scientists with the USGS were pioneers when they determined the scope of the potential problem and published "Pharmaceuticals, Hormones and Other Organic Wastewater Contaminants in U.S. Streams, 1999-2000: A National Reconnaissance."

Seeking water for their study that was susceptible to contamination due to city **wastewater** discharges, storm water runoff and livestock production, the researchers picked 139 streams **in** 30 states, including the Trinity River near Dallas and Barton Creek outside Austin. Eighty percent **of** the tested streams contained emerging contaminants.

The most frequently detected compounds were fecal steroid, cholesterol, insect repellent, caffeine, antimicrobial disinfectant, fire retardants and non-ionic detergent metabolite. The concentrations found during the study were generally low and rarely fell below drinking-water standards.

Other research **in** Texas includes a pair **of** Baylor University studies based on fish **in** Pecan Creek. They live directly downstream from a **wastewater** plant run by the city **of** Denton that discharges 20 million gallons **of** treated effluent daily.

During non-storm conditions, Pecan Creek is almost 100 percent effluent. A couple **of** miles from the **wastewater** plant, the creek drains into Lewisville Lake, a 23,280-acre reservoir that supplies drinking water to the cities **of** Dallas, Denton and Lewisville. Researchers say it's unlikely that contaminants from the **wastewater** plant could reach the lake.

But the brains, livers and muscle tissues **of** bluegills, catfish and crappies caught near the discharge plant contained trace amounts **of** fluoxetine, norfluoxetine, sertraline and desmethylsertraline, **chemical** compounds used to make antidepressants.

A follow-up study published last spring detected three additional drugs **in** the fish tissues: a heart medication, a Benadryl-type compound and an anticonvulsant and mood-stabilizing drug used **in** the treatment **of** epilepsy, bipolar disorder and schizophrenia.

"There's fish **in** the creek that are on more than just Prozac and Zoloft," said Bryan W. Brooks, an associate professor **in** Baylor's department **of** environmental studies who worked on both Pecan Creek projects.

The research throws cold water on the "canary **in** the coal mine" method **of** determining the quality **of** streams, rivers and lakes. Brooks, who also works **in** Baylor's Center for Reservoir and Aquatic Systems Research, thinks that examination **of** subtle, sublethal changes, such as a fish's feeding behavior, may be a better way to assess the impact **of** emerging contaminants than whether fish can live **in** the water or not.

Detection **of** such low levels **of** compounds is another problem. The current lack **of** standardized methodologies means apples-to-apples comparisons **of** samples from one study to another often can't be made. Compounding the problem: The **chemicals** frequently change after people use them.

"We can measure maybe 150 compounds, but that's still barely scratching the surface," said Kolpin **of** the USGS.

Waiting for answers

With so many pharmaceuticals, hormones and other organic **wastewater** to choose from -- and their derivatives -- which ones should water treatment plants target for filtration?

Take caffeine, for example. It's one **of** the most common emerging contaminants

and probably one of the most easily removed. But what kind of harm can its presence cause in a society where so many are addicted to coffee, lattes and cappuccinos?

Other compounds are more sinister. High on the EPA's hit list are endocrine-disruptors. These are synthetic compounds that can affect the complex human endocrine system by mimicking or blocking normal body functions, including growth, development and maturation.

Endocrine-disruptors are the prime suspects in some developmental, neurological, immune system and reproductive disorders, such as the creation of "intersex" fish.

Under the federal Clean Water Act, the EPA recently issued criteria and regulatory standards for nonylphenol, which is used in some detergents, pesticides and contraceptive spermaticides, and tributyltin, a biocide traditionally used in marine antifouling paints.

"Those are two chemicals that have shown endocrine-disrupting characteristics in aquatic life, in fish and in wildlife in rivers and streams," the EPA's Grumbles said.

In the absence of federal guidelines for the vast majority of the emerging contaminant roll call, local water agency officials have adopted an aggressive watch-and-learn approach while waiting to see if the other shoe drops.

Clouse and other employees at SAWS are keeping current through conferences and literature.

Clouse says "watching emerging contaminants is something I think we need to pay attention to," but until the EPA and the Texas Commission on Environmental Quality sets standards, testing for the compounds would be meaningless.

"Is a 5-parts-per-trillion number a good number or a bad number?" Clouse asked. "We don't know. So, until there are action levels that tell us what the numbers mean, do we need to do something about it?

"I don't think the general public needs to be concerned about it. I think our obligation in the wastewater treatment system is to keep up with the science."

SAWS has won EPA awards for the quality of its treated wastewater. Its water recycling plants remove what might be called "traditional pollution," things such as bacteria, nitrogen, phosphorus, chlorides, and suspended and dissolved solids. Retrofitting to remove emerging contaminants is possible.

Fred Winter, a SAWS permit administrator, says the plants could use absorption techniques with activated carbon, membrane filtration and possibly even reverse osmosis. Ironically, that treated wastewater would be so clean -- almost like distilled water -- that it might be necessary to add nutrient-rich water from another source to keep the Medina River's "canaries" and other aquatic life alive.

With so many variables in the emerging contaminants equation, Clouse says it's virtually impossible to estimate what it could cost to eliminate the compounds safely and effectively.

"I suspect it's going to be high, let's put it that way," he said. "It's going to have a lot of zeroes behind it."

duhler@express-news.net

Terry Monday
9950 FM 471 Souty
LaCoste, Texas 78039

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C/O City of Castroville Water Quality Permit #
10952001
Texas Commission on Environmental Quality
Office of Chief Clerk, Mail Code 105
P O Box 13087
Austin, Texas 78711-3087

78711+3087 B012

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PLEASE PRINT:

Name: ROBERT ZICHELL

Address: 1813 SAN JACINTO

City/State: CASTROVILLE TX Zip: 78009

Phone: ( )

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Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

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11/29/07

I HAVE PROPERTY IN CASTROVILLE THAT IS ON THE MEDINA RIVER. ALTHOUGH IT IS DOWNSTREAM FROM THE CASTROVILLE SEWAGE PLANT OVER THE LAST SEVEN YEARS I HAVE SEEN THE QUALITY OF WATER CONTINUE TO DECLINE AND BECOME CHOKED WITH ALGAE AND OTHER POLLUTANTS THAT AGGRAVATE SUCH GROWTH IN THE RIVER.

I HAVE TWO QUESTIONS:

* IS THERE ANY OVERVIEW OF OTHER COMMUNITIES UPSTREAM IN TERMS OF THE AMOUNT OF AFFLUENTS BEING DISCHARGED? IS THERE A MAXIMUM TOTAL STANDARD FOR THE RIVER?

* ARE THERE ANY PROGRAMS OR MOTIVATION FOR CASTROVILLE TO USE THIS DISCHARGE FOR ANY OTHER PURPOSE SUCH AS GREY WATER RECYCLING? HOW CAN WE HELP YOU HELP THIS STATE FILL THIS NEED?

ROBERT ZIEBELL
1813 SAN JACINTO
CASTROVILLE, TX 78009

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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