Buddy Garcia, *Chairman*
Larry R. Soward, *Commissioner*
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Blas J. Coy, Jr., *Public Interest Counsel*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 30, 2009

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2009 MAR 30 PM 1:52
CHIEF CLERKS OFFICE

LaDonna Castañuela, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

RE: **HILL COUNTRY CAMP**
TCEQ DOCKET NO. 2009-0085-MWD

Dear Ms. Castañuela:

Enclosed for filing is the Public Interest Counsel's Response to Requests for Hearing and Requests for Reconsideration in the above-entitled matter.

Sincerely,

Vic McWherter

Vic McWherter, Senior Attorney
Public Interest Counsel

cc: Mailing List

Enclosure

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

2009 MAR 30 PM 1:59

CHIEF CLERKS OFFICE

TCEQ DOCKET NO. 2009-0085-MWD

IN THE MATTER OF THE	§	**BEFORE THE**
APPLICATION OF	§	
HILL COUNTRY CAMP	§	**TEXAS COMMISSION ON FOR**
FOR A NEW MUNICIPAL	§	
WASTEWATER PERMIT	§	**ENVIRONMENTAL QUALITY**
TPDES PERMIT NO. WQ0014832001	§	

THE OFFICE OF PUBLIC INTEREST COUNSEL'S RESPONSE TO REQUESTS FOR HEARING AND REQUESTS FOR RECONSIDERATION

To the Members of the Texas Commission on Environmental Quality:

The Office of Public Interest Counsel (OPIC) of the Texas Commission on Environmental Quality (Commission or TCEQ) files this Response to Requests for Hearing and Requests for Reconsideration in the above-referenced matter and would respectfully show the following:

I. INTRODUCTION

Hill Country Camp (Applicant) has applied to the TCEQ for a new municipal wastewater discharge permit to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 25,000 gallons per day. The Applicant's proposed facility would be located at 1319 Harper Road in Kerrville County Texas. The Applicant's facility would be an activated sludge process plant operated in the extended aeration mode. Treatment units would include the following: bar screen; aeration basin; final clarifier; aerobic digester; and a chlorine contact chamber. Treated effluent would be discharged to an unnamed tributary flowing into on-channel lakes of Town Creek, then into the Guadalupe River above Canyon Lake. The receiving water basin's designated uses are for exceptional aquatic life, public water supply, aquifer protection and contact recreation.

Hill Country Camp filed this application on July 3, 2007 and the Executive Director (ED) declared the application administratively complete on July 24, 2007. On July 27, 2007, the Notice of Receipt of Application and Intent to Obtain a Water Quality Permit (NORI) was published in *The Kerrville Daily Times*. The TCEQ held a public meeting on May 29, 2008. Subsequently, the ED completed technical review of the application and the Notice of Application and Preliminary Decision was published on July 10, 2008 in the same newspaper. The comment period ended on August 11, 2008. The Chief Clerk's office mailed the Executive Director's decision and response to Comments on December 16, 2008 and the deadline for filing requests for hearing and requests for reconsideration was January 15, 2009.

The TCEQ received voluminous timely comments, requests for reconsideration and requests for contested case hearings. OPIC recommends granting the hearing requests submitted by the City of Kerrville, the Upper Guadalupe River Association, James Olafson, Bonnie Olafson, Tommy and Pia Olafson, Tammy Patterson and Wendy Barber. OPIC further recommends denial of all requests for reconsideration.

II. REQUIREMENTS OF APPLICABLE LAW

A. Request for Reconsideration

House Bill 801 created a procedural mechanism, the Request for Reconsideration, that allows for the Commission's review of the Executive Director's decision on an application. A person may file a request for reconsideration, contested case hearing or both no later than 30 days after the chief clerk's transmittal of the Executive Director's decision and Response to Comments. TEXAS WATER CODE § 5.556; 30 TAC § 55.201(a) and (e).

Any person may file a Request for Reconsideration of the Executive Director's Decision. 30 TAC § 55.201(e). The Request for Reconsideration must state the reasons why the decision should be reconsidered. 30 TAC § 55.201(e).

Responses to requests for reconsideration should address the issues raised in the request. 30 TAC § 55.209(f).

The TCEQ received Requests for Reconsideration of the Executive Director's Decision (RFRs) from the following individuals: Ron Atkins, Moira Attwell, David "Patrick" Braden III, Anne Brown, Mary Jo Browning, Betty Bumgarner, Darci Burchers, Barbara Burton, Susan Candy, Chris Hughes, Elizabeth Ireland, Deborah and John Jascur, Paula Karl, Steve Louden, Marie and S.W. McMillen, Dennis McNamara, Nanette and Tom Newbern, Tammy Paterson, Joyce Pelato, Jean Reed, Angela Santagata, Sherry Secor, Randy Simmons, Barsha Thibodeaux, Arlene Wheaton, Ann Wickham, D.H. Wilson, and Mary Ann Young.

The RFRs submitted raise issues related to the proposed activity's potential negative impacts on: the use and enjoyment of property, recreational uses of the receiving waters, surface water quality (Town Creek and the Guadalupe River), groundwater quality (Trinity and Edwards Aquifers), wildlife, and livestock. In addition, the RFRs raise issues concerning the proposed activity's contribution to nuisance odors, excessive noise, and the lowering of community income and property values. Many individuals suggest that the location for the discharge route and the plant is inappropriate. Individuals are also concerned about whether the property will be properly maintained and whether spills can be adequately avoided. Other requesters suggest alternatives should be explored, including requiring reuse of the water as irrigation and avoidance of discharge

altogether. Requesters suggest that since the plant will service a summer camp, that the models are potentially flawed to include year-around considerations. Requesters also suggest that allowing this facility to be constructed will increase the likelihood for additional development in the area.

The RFRs are based on the same or similar issues that are raised in the requests for hearing found below. While OPIC is sympathetic to the concerns raised in each request for reconsideration, OPIC cannot recommend the granting of these requests. The Commission lacks jurisdiction over noise issues, and property values, and future development planning or zoning associated with this permit. The remaining issues given as reasons for requesting reconsideration are based on concerns which are governed by the law applicable to this permit. These concerns are within the jurisdiction of the Commission to address in the context of proceedings on this application. An evidentiary record, however, would be necessary for OPIC to make a recommendation to the Commission as to whether the permit should be denied based on these concerns. OPIC does recommend granting hearing requests as discussed below.

B. Requests for Contested Case Hearing

This application was declared administratively complete on September 15, 2006. Because the application was declared administratively complete after September 1, 1999, it is subject to the requirements of Texas Health & Safety Code § 382.056 and Texas Water Code § 5.556 added by Acts 1999, 76th Leg., ch 1350 (commonly known as "House Bill 801"). Under the applicable statutory and regulatory requirements, a hearing request must substantially comply with the following: give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request;

identify the requestor's personal justiciable interest affected by the application showing why the requestor is an "affected person" who may be adversely affected by the proposed facility or activity in a manner not common to members of the general public; request a contested case hearing; list all relevant and material disputed issues of fact that were raised during the comment period that are the basis of the hearing request; and provide any other information specified in the public notice of application. 30 TAC § 55.201(d).

Under 30 TAC § 55.203(a), an affected person is "one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application." This justiciable interest does not include an interest common to the general public. 30 TAC § 55.203(c) also provides relevant factors that will be considered in determining whether a person is affected. These factors include:

(1) whether the interest claimed is one protected by the law under which the application will be considered;
(2) distance restriction or other limitations imposed by law on the affected interest;
(3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
(4) likely impact of the regulated activity on the health, safety, and use of property of the person;
(5) likely impact of the regulated activity on use of the impacted natural resource by the person; and
(6) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

The Commission shall grant an affected person's timely filed hearing request if: (1) the request is made pursuant to a right to hearing authorized by law; and (2) the request raises disputed issues of fact that were raised during the comment period and that are relevant and material to the commission's decision on the application. 30 TAC §55.211(c).

Accordingly, pursuant to 30 TAC § 55.209(e), responses to hearing requests must specifically address:

(1) whether the requestor is an affected person;
(2) which issues raised in the hearing request are disputed;
(3) whether the dispute involves questions of fact or law;
(4) whether the issues were raised during the public comment period;
(5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director's response to Comment;
(6) whether the issues are relevant and material to the decision on the application; and
(7) a maximum expected duration for the contested case hearing.

III. DISCUSSION

The TCEQ received the following individual requests for a contested case hearing:

A. Determination of Affected Person Status

The City of Kerrville (the City) filed a timely request for a contested case hearing through its attorney of record, Ms. Emily Rogers. The City's master plan for its parks recommends that Town Creek be incorporated into the City's trail and park system. Additionally, the plan recommends an additional park of 16-75 acres which would be located in close proximity to the proposed discharge. The City further states that the location of the proposed discharge is immediately upstream of the city's current corporate boundaries, and that following a planned annexation to be completed in January 2010, the Applicant's property and discharge point will be within the City's 1 mile extraterritorial jurisdiction. The City states a concern about potential adverse affects on recreational opportunities in several city parks currently located just downstream from the proposed discharge.

The City is an affected person because it is a governmental entity with authority over water quality issues relevant to this application. 30 TAC §55.203(c)(6). The municipalities of Texas have general authority to promote and protect the health and welfare of persons residing within their borders and within their extra-territorial jurisdiction. Texas Health & Safety Code § 121.003; Texas Local Gov't Code §42.001. Moreover, Texas Water Code Section authorizes cities to carry out specific duties, functions and programs for purposes of water pollution prevention. For all of these reasons, OPIC finds that the city is an affected person pursuant to 30 TAC §55.203(c)(6).

The Upper Guadalupe River Authority (UGRA) has filed a timely request for contested case hearing through its attorney of record, Anthony S. Corbett. UGRA is a conservation and reclamation district and political subdivision of the State of Texas created pursuant to Article XVI, Section 59 of the Texas Constitution. UGRA asserts that its enabling legislation grants UGRA authority to preserve the waters of the Upper Guadalupe and its tributaries within Kerr County, Texas, and to protect the purity of waters within its jurisdiction. UGRA states an interest in protecting the waters within the Upper Guadalupe and its tributaries from pollution caused by the proposed discharge. UGRA is a governmental entity with statutory authority over the water quality issues relevant to this application. 30 TAC §55.203(c)(6). For these reasons, UGRA is an affected person.

Wendy Barber owns property located at 119 McCullough Ranch Road,in Kerrville. In her hearing request dated January 13, 2009, she states that her property is located approximately 150 feet from the proposed wastewater treatment plant. Her location relative to the property is confirmed by her listing on the Adjacent and

Downstream property owners' map that was filed with the application. She is concerned that the proposed facility will impact her use and enjoyment of her property because of odors, groundwater pollution, and sewage spills. She is also concerned about the impact of the facility on her recreational uses of Town Creek for fishing, kayaking and swimming. Ms. Barber is further concerned about the potential impacts of pollution from the plant on aquatic life, aquatic habitat, plant life and human health. Ms. Barber's interests are protected by the law which governs this application. 30 TAC §55.203(c)(1). Because of her location relative to the proposed facility, there is a reasonable relationship between Ms. Barber's stated interests and the activities regulated. 30 TAC §55.203(c)(3) For these reasons, OPIC finds that Ms. Wendy Barber is an affected person.

James Olafson has filed hearing requests and comments through his attorney of record, Roger Borgelt and the firm Potts & Reilly. Mr. Olafson resides at 160 Turkey Run Circle North, Kerrville, Texas. According to his request, Mr. Olafson resides approximately 450 feet from the proposed facility. The hearing request states that the water body identified in the application as the "first lake on Town Creek below the discharge" is located on Mr. Olafson's property and in close proximity to his home. The requestor states a concern that the proposed discharge will further diminish the quality of the receiving waters, which are already impaired for bacteria.

The requestor questions how the executive director can find that existing uses of the receiving waters will not impacted beyond a de minimus level if a discharge is authorized into waters which are not flowing. The requestor notes that this issue is particularly troublesome given that poor water quality in the Segment has already created the need for a TMDL, and the fact that the City of Kerrville has been cited for violations

of permitted effluent limitations into these waters. Mr. Olafson is further concerned about the impact of the discharge of effluent into the stagnant lake waters extending across his property with respect to impacts to aquatic life and the creation of algae blooms.

Mr. Olafson's interests in water quality are protected by the law which governs this application. 30 TAC §55.203(c)(1). Because of the location of his property relative to receiving waters and the proposed facility, there is a reasonable relationship between Mr. Olafson's interest in protecting water quality and the proposed wastewater activities to be regulated under the permit. 30 TAC §55.203(c)(3) For these reasons, OPIC finds that Mr. James is an affected person.

Ms. Bonnie Olafson, who provides the same address as Mr. James Olafson at 160 Turkey Run Creek, has filed a separate timely hearing request. Ms. Olafson states concerns about the effect of the proposed discharge on the stagnant "unnamed tributary" that lies within the boundaries of her property. Ms. Bonnie Olafson is listed as an adjacent or downstream landowner on the map and list of such neighboring landowners submitted with the application. Ms. Olafson that the receiving waters have insufficient flow and do allow for proper dilution and mixing. She is concerned about how the receiving waters will be affected in terms of temperature, ph, ammonia, and chlorine. Ms. Olafson states an interest in protecting wildlife, and her own cattle and exotic game, and consequently her economic interests, from the adverse impacts of the discharge. For the same reasons which support OPIC's findings regarding Mr. James Olafson, Ms. Bonnie Olafson is an affected person.

Tommy and Pia Olafson state that they reside at 1308 Harper Road in Kerrville. The description of their property is similar to the description provided in the request of Mr. James Olafson and of Ms. Bonnie Olafson, both of which are discussed above. Like the other Olafson requestors, Tommy and Pia Olafson state that they reside in close proximity to the unnamed tributary receiving the discharge and staying within the confines of their family property for 475 feet before discharging into the on-channel lake of Town Creek. Tommy and Pia Olafson express concern about adverse impacts to their property and the water quality on their property. For the same reasons which support OPIC's findings regarding the other Olafson requesters, Tommy and Pia Olafson are affected persons.

Tammy Patterson states that she resides at 129 McCullough Ranch Road in Kerrville. Her hearing request states that her property is located in very close proximity to the proposed facility and discharge route. In fact, she contends that her property is located within the 150 foot buffer zone. She expresses concerns about adverse impacts to her health from viruses, bacteria, parasites and fungi that may be contained in the discharged effluent. Ms. Patterson is further concerned about nuisance odor conditions, adverse affects on wildlife habitat, her recreational uses of affected waterways, and adverse impacts to her economic interest based on an inability to pursue of goal of starting a certified organic vineyard.

Ms. Patterson's interests are protected by the law which governs this application. 30 TAC §55.203(c)(1). Because of her location relative to the proposed facility, there is a reasonable relationship between Patterson's stated interests and the activities regulated.

30 TAC §55.203(c)(3). For these reasons, OPIC finds that Ms. Tammy Patterson is an affected person.

B. Issues Raised in the Hearing Requests

The affected persons discussed above have raised the following issues in their hearing requests:

(1) Whether the effluent limits in the draft permit meet water quality standards (the City)

(2) Whether the permit will cause degradation of water quality, and should the applicant be required to consider other alternative methods of wastewater treatment and disposal (James Olafson, Bonnie Olafson, Tommy and Pia Olafson, Tammy Patterson, Wendy Barber City; UGRA)

(3) Whether the effluent limits protect existing uses of the discharge route including all unnamed tributaries, Town Creek and the Guadalupe River (James Olafson, Bonnie Olafson, Tommy and Pia Olafson, Tammy Patterson, Wendy Barber, City, UGRA)

(4) Whether the applicant should be required to meet more stringent effluent limitations that the City of Kerrville is required to meet (City; UGRA)

(5) Whether the proposed discharge is consistent with the TMDL for Segment No, 1806 (City; James Olafson)

(6) Whether the draft permit requires sufficient monitoring of the plant and the discharge (James Olafson, City)

(7) Whether the provisions of the draft permit protect against and mitigate the effects of any unauthorized discharges and upsets at the plant (City)

(8) Whether the proposed plant will result in nuisance odor conditions (James Olafson, Bonnie Olafson, Tommy and Pia Olafson, Tammy Patterson, Wendy Barber)

(9) Whether the draft permit should include additional provisions regarding the hauling and disposal of sludge? (James Olafson)

(10) Whether Applicant's permitted activities would have an adverse affect on human health and quality of life? (James Olafson, Bonnie Olafson, Tommy and Pia Olafson, Tammy Patterson, Wendy Barber)

(11) Whether the Applicant's permitted activities would have an adverse effect on wildlife or domestic livestock or exotic game ? (James Olafson, Bonnie Olafson, Tommy and Pia Olafson, Tammy Patterson, Wendy Barber)

1. Issues Disputed

All of these issues remain disputed, based on the hearing requests received following the mailing of the executive director's response to comments.

2. Issues of Fact

All of the issues set forth above are issues of fact.

3. Issues Raised During the Comment Period

All of the issues discussed above were raised during the comment period.

4. Relevant and Material Issues

The hearing requests raise issues relevant and material to the Commission's decision under the requirements of 30 TAC §§ 55.201(d)(4) and 55.211(c)(2)(A). Concerns regarding whether the permit will maintain existing uses, comply with anti-degradation requirements, otherwise protect water quality in Segment 1806, and be consistent with the TMDL relate to whether the permit is in compliance with Texas Surface Water Quality Standards. Whether the proposed permit will protect aquatic life and human health in accordance with Texas Surface Water Quality Standards is an issue

relevant and material to the Commission decision. Pursuant to 30 TAC §307.1: "It is the policy of this state and the purpose of this chapter to maintain the quality of water in the state consistent with public health and enjoyment, propagation and protection of terrestrial and aquatic life, operation of existing industries, and economic development of the state." Concerns regarding the prevention of nuisance odor conditions are addressed by 30 TAC §309.13 and 307.4(b) Accordingly, Issues 1-11 set forth above are relevant and material to the Commission's decision on this application. The issue of effects on property values raised by some requestors is not within the Commission's jurisdiction to address and therefore it is not relevant and material to this application.

5. Issues Recommended for Referral to Hearing

In light of the requirements of 30 TAC §§ 50.115(b) and 55.211(b)(3)(A)(I), OPIC recommends that the Commission refer each of the issues 1-11 listed above under Section II B to SOAH for a contested case hearing.

C. Maximum Expected Duration of Hearing

Commission rule 30 TAC § 50.115(d) requires that any commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides that no hearing shall be longer than one year from the first day of the preliminary hearing to the date the proposal for decision is issued. To assist the Commission in stating a date by which the judge is expected to issue a proposal for decision, and as required by 30 TAC § 55.209(e)(7), OPIC estimates that the maximum expected duration of a hearing on this application would be nine months from the first date of the preliminary hearing until the proposal for decision is issued.

IV. CONCLUSION

OPIC recommends granting the hearing requests submitted by the City of Kerrville, the Upper Guadalupe River Association, James Olafson, Bonnie Olafson, Tommy and Pia Olafson, Tammy Patterson and Wendy Barber and referring this matter to SOAH with respect to issues 1-11 set forth in Section II B above. OPIC further recommends denial of all pending requests for reconsideration.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2009 the original and seven true and correct copies of the Office of the Public Counsel's Response to the Requests for Hearing and Requests for Reconsideration were filed with the Chief Clerk of the TCEQ and a copy was served to all persons listed on the attached mailing list via facsimile transmission, and Inter-Agency Mail or by deposit in the U.S. Mail.

Vic McWherter

2009 MAR 30 PM 1:59
CHIEF CLERKS OFFICE
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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TCEQ DOCKET NO. 2009-0085-MWD

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