(1)

TCEQ Public Meeting Form

Thursday, October 1, 2009

Synagro of Texas-CDR, Inc.
Beneficial Land Use Permit
Proposed Permit Nos. WQ0004887000, WQ0004888000, & WQ0004890000

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2009 OCT -5 PM 1:58
CHIEF CLERKS OFFICE

PLEASE PRINT:

Name: Rosemary W. Kalina

Mailing Address: PO Box 1056 - Bastrop 78602

Physical Address (if different): 15309 Richards Dr.

City/State: Del Valle Tx **Zip:** 78617

Phone: (512) 247 2513

☒ **Please add me to the mailing list.**

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

If yes, which one? _____

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.

MW

(3)

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2009 OCT -5 PM 1:59
CHIEF CLERKS OFFICE
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

PLEASE PRINT:

Name: Thomas Weber

Mailing Address: Travis County - TNR POB 1748

Physical Address (if different): $

City/State: Austin TX Zip: 78767

Phone: (512) 854-4629

☑ Please add me to the mailing list.

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

If yes, which one? Travis County, TX

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m2

TRANSPORTATION AND NATURAL RESOURCES
JOSEPH P. GIESELMAN, EXECUTIVE MANAGER

NATURAL RESOURCES & ENVIRONMENTAL QUALITY

411 West 13th Street
Executive Office Building
PO Box 1748
Austin, Texas 78767
(512) 854-9383
FAX (512) 854-4697

OPA RECEIVED
OCT 01 2009
AT PUBLIC MEETING

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2009 OCT -5 PM 1:59
CHIEF CLERKS OFFICE

29 September 2009

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

Re: Proposed TCEQ Permits WQ-04887. WQ-04888, and WQ-04890, Synagro of Texas-CDR, Inc.

Sir or Madame:

On September 2, 2009, Travis County received notice of a public meeting and opportunity to comment, relating to the above-referenced applications. In response, our division reviewed the permit applications for consistency with applicable state rules. Additionally, we reviewed the applications for consistency with Travis County requirements. We provide the following comments:

1. TCEQ promulgated subsection (c) in 30 TAC §312.44 which states that:

(c) When bulk sewage sludge that does not meet Class A pathogen requirements or septage is applied to agricultural land, forest, or a reclamation site, buffer zones must be established for each application area as noted in this section unless otherwise specified by the Commission.

(1) Surface water:

(A) 200-foot buffer zone, if the sludge is not incorporated; for land application sites located in a major sole-source impairment zone this buffer zone must maintain a vegetative cover;

(B) 33-foot vegetative buffer zone, if the sludge is incorporated.

From available application information, there is not information to suggest sewage sludge would be incorporated so it appears the 200-foot buffer applies to the proposals. Application WQ04887, the Rosemary tract, includes land management units (LMUs) #2 and #3, through which a tributary of Dry Creek passes. Application WQ04888, the Richard-Rosemary tract, includes LMUs #2 and #3, through which a tributary of Dry Creek passes. Application WQ04890, the

Williams tract, includes LMUs #2, #3, and #4, through which tributaries of Dry Creek pass. In each instance, the applicant does not show a 200-foot buffer from these surface water courses.

2. Our review indicates the solid waste management activities as proposed, to beneficially land apply sewage sludge, are inconsistent with the Travis County Code, Chapter 62 (relating to Siting of Solid Waste Facilities). Specifically, there are proposed land application areas within the:

- 500 foot setback from the FEMA 100-year flood plain boundary; and
- 1500 foot setback from individual residences.

If you have any questions, please contact Mr. Thomas Weber of my staff at (512) 854-4629 or me at 854-7212.

Sincerely,

Jon A. White, Director
Natural Resources and Environmental Quality Division

JAW/tw

cc: Mr. Aaron L. Dorger, Synagro of Texas-CDR, Inc.

From: PUBCOMMENT-OPA
To: PUBCOMMENT-OCC2
Date: 9/30/2009 2:23 PM
Subject: Fwd: Public comment on Permit Number WQ0004887000
Place: PUBCOMMENT-OCC2
Attachments: synagro-comments-tceq.pdf

>>> PUBCOMMENT-OCC 9/29/2009 3:44 PM >>>

>>> <thomas.weber@co.travis.tx.us> 9/29/2009 3:03 PM >>>

REGULATED ENTY NAMEROSEMARY TRACT
RN NUMBER:RN105718084
PERMIT NUMBER:WQ0004887000
DOCKET NUMBER: Not Found
COUNTY:TRAVIS
PRINCIPAL NAME:SYNAGRO OF TEXAS-CDR INC
CN NUMBER:CN601307630
FROM
NAME: Thomas Weber
E-MAIL:thomas.weber@co.travis.tx.us
COMPANY: Travis County, Texas
ADDRESS:PO BOX 1748
AUSTIN TX 78767-1748
PHONE:
FAX:
COMMENTS: These comments are submitted on 3 permits - WQ03887, WQ03888, and WQ03890

4887, 4888 & 4890

IWD / 68524 - 68523 - 68997

TRANSPORTATION AND NATURAL RESOURCES
JOSEPH P. GIESELMAN, EXECUTIVE MANAGER
NATURAL RESOURCES & ENVIRONMENTAL QUALITY

411 West 13th Street
Executive Office Building
PO Box 1748
Austin, Texas 78767
(512) 854-9383
FAX (512) 854-4697

TWP
68524

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Texas Commission on Environmental Quality
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Austin, Texas 78711-3087

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Jon A. White, Director
Natural Resources and Environmental Quality Division

JAW/tw

cc: Mr. Aaron L. Dorger, Synagro of Texas-CDR, Inc.

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CHIEF CLERKS OFFICE

PLEASE PRINT:

Name: RUSSELL V. WILLIAMS

Mailing Address: 4605 COBBLER COVE

Physical Address (if different): —

City/State: AUSTIN, TX. Zip: 78744

Phone: (512) 443-6058

☑ 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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Williams Charolais
Russell V Williams
4605 Cobbler Cove
Austin, Texas 78744
512-443-6058
rvwilliams@austin.rr.com

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BP

October 1, 2009

The following are comments as requested by the Texas Commission on Environmental Quality pertaining to the application of wastewater treatment plant sludge for beneficial use by Synagro of Texas – CDR, Inc.

My name is Russell Williams. I am a cattle rancher and have requested Synagro to include my ranch in the application of the sludge. As you know, this area is in an extreme drought (the worst in the entire nation) and even though we have received some much needed rain in the last few weeks, this area still has a serious lack of moisture. All my tanks are still dry and if the small rains we have been getting stop within a short period of time, we will be right back in the same position as before these last rains. As with most ranchers in this area of extreme drought, I have had to reduce the number of cattle in my herd. I now have less than fifty percent of the cattle I had before the drought. If the drought were to end tomorrow it would take me several years to get back to where I was before this drought started.

This does not just mean increasing my herd numbers but also allowing the soil to "rebuild" itself and grasses to reestablish. When Synagro contacted me about applying the sludge it was the best news I had heard in a long time. I am very familiar with the benefits of sludge application. Because of past experience, I know that if sludge is spread on my land the time it takes to get back to pre-drought conditions will be reduced. Around 1982, sludge was applied to my land and all the land around me. It didn't take long for me, and the others, to realize how superior the organic sludge was to the chemical fertilizers we had been using. Crops and grasses grew as they had never done before and the soil seemed to be revitalized. The application was done only one year, but the benefits easily lasted over four years. In the years following the application, and with the same amount of chemical fertilizer, you could still see the difference in the productivity of the land that had received the sludge and the land that had not.

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

I cannot recall any problems with the sludge during the application or after the application. My neighbors did not have any complaints and most have applied to Synagro for the current sludge. There were not any problems with runoff or bad odors during or after the application. My neighbors and I would be standing within a few feet of the application and not smell anything bad. Synagro has explained that the current sludge has been treated much more than the sludge I had applied in 1982.

MW

As with most ranchers and farmers, we are on the edge of going out of business because of the extreme drought. Many in this area have already quit. By allowing the application of the sludge you will be buying us time to remain in business until the drought is over. We will save thousands of dollars by not having to buy chemical fertilizers, which have seen a sharp increase in costs in the last few years. It will maximize the benefits of the small rains we get until the end of the drought.

As I see it, there is another benefit to the sludge application – perhaps the best of all. When the organic natural fertilizer of sludge is applied, the soil is renewed. I don't like using chemical fertilizers, but at times I have no choice. I'm sure that a lot of farmers and ranchers fell the same way. We want to protect the land because without good soil we are out of business. But at the same time, in order to stay in business, we have to make a profit. By allowing us to use organic fertilizer, the "balancing act" we do between chemical and no chemical is for the most part eliminated.

It seems to me this is a win/win situation for everyone. The farmers save money by using organic fertilizer and not buying chemical fertilizer. The taxpayers benefit by having a way to remove waste in a safe and environmentally friendly manner. The land benefits by having an organic natural fertilizer spread on it to help and allow it to rebuild itself. We are told we need to "go green" whenever possible and I agree. By allowing the use of organic natural fertilizer in a safe way, that's what we would be doing.

There have been many false rumors floating around about what Synagro, the farmers, and ranchers want to do. As with a lot of false rumors, they are hard to quiet. Hopefully, this meeting will quell the fears and people will listen and understand.

Programs like this are being used all over the United States to the benefit of agriculture and the environment. I simply do not see any problems, based on my past experience with organic sludge and my conversations with Synagro. I urge you to approve the application.

Thank you.

Russell Williams

Russell Williams