

TCEQ Public Meeting Form  
May 14, 2013

(12)

Williamson County MUD No. 19  
TPDES Permit No. WQ0015000001

RECEIVED

MAY 14 2013

AT PUBLIC MEETING

PLEASE PRINT ✓ ✓

Name: Mike & Pam Goolsby

Mailing Address: 2550 CR 258

Physical Address (if different): \_\_\_\_\_

City/State: Liberty Hill TX Zip: 78642

\*\*This information is subject to public disclosure under the Texas Public Information Act\*\*

Email: pa.goolsby@hotmail.com ✓

Phone Number: (817) 905 4067

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

If yes, which one? \_\_\_\_\_

Please add me to the mailing list. ✓

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

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 form to the person at the information table. Thank you.

*mu*

5/14/2013

(A)

We are residents of Liberty Hill. Our property is 2550CR258 just north of the proposed plant site. We've heard nothing about this until someone posted a hand printed sign regarding this meeting. Needless to say we are very concerned about our property values, air quality & over all impact this will have on our life.

We went through extensive approvals for the placement of our septic system due to North San Gabriel branch being nearby. We will now be effected by an air quality threat without due consideration of our needs or quality of life.

The fact that ground water impact has not been considered. Especially since we are in proximity to the Balcones Fault. Our neighbors are on well water; how will their water quality be comprised.

Please consider the direct impact this will have on residents who live nearby.

We formally contest this.

Patricia Spolsky  
Mike Spolsky

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MAY 14 2013  
AT PUBLIC MEETING

173

# MEETING AGENDA

- Introduction [7:00 p.m.].....TCEQ
- Identify Elected Officials.....TCEQ
- Presentations.....Applicant & TCEQ

## Informal Discussion Period

- Questions & Answers.....Public

Members of the public may ask questions during this time period. TCEQ staff and the Applicant will respond to questions. This time period is for discussion purposes and for obtaining information from TCEQ staff and the Applicant. **Questions and/or comments made during this period will not be considered formal comment, and will not go to the Commissioners. Additionally, no written response will be prepared for comments made during this period.**

## Formal Comment Period

- Formal Comments.....Public

During the formal comment period members of the public may voice concerns or comments. **Neither the Applicant nor TCEQ staff will respond during the formal comment period.** After the close of all comment periods, the Executive Director will summarize the formal comments and prepare a written response to comments (RTC). This RTC will be made available to the public and will also be mailed to those who submitted written comments or formal comments at a public meeting.

**Everyone who wishes to comment will have the opportunity to do so, however, we may ask that each commentor limit their time so that everyone will have time to speak.**

- Closing Remarks/Adjournment.....TCEQ

**Please Note:** Written comments may be submitted anytime during the evening.

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

August 11, 2013

2013 AUG 13 AM 10: 23

Brian and Cara Massey  
3701 CR 258  
Liberty Hill, TX 78642  
512-810-2966  
512-810-2955

CHIEF CLERKS OFFICE

Office of the Chief Clerk, MC 105  
TECQ  
PO Box 13087  
Austin, TX 78711-3087

MWD  
76581e

REVIEWED

AUG 13 2013

By         

4

Dear Chief Clerk,

I am writing to request a contested case hearing regarding Permit for Municipal Wastewater # WQ0015000001. The applicant is Williamson County MUD 19. I am making this request because of my belief that my property and family will be negatively affected by this facility and its discharge. My property is located at the above address. The affected area of my property lies approximately 3500 meters from the proposed location of the facility. The northern-most portion of my property begins where Soves Branch joins into the North San Gabriel River, continuing east along the river.

It is my belief that the proposed facility and the effluent discharge from it, will adversely affect my property and the health of my family. The creek that the effluent is proposed to discharge into, Soves Branch, is an intermittent stream, running with water only after a good rain. Most of the time, it is dry. As such, the effluent would be hitting the North San Gabriel essentially undiluted from its 3500 meter journey along Soves Branch.

I have a concern about the health of my family, as sewage treatment facilities are known to not remove pharmaceuticals in the waste water, including hormones, anti-seizure medicines, and psychoactive medications. It is not yet known what the potential effects might be on humans, but there is concern in the research community about the long-term impacts. Additionally, at the public meeting held May 14<sup>th</sup>, it was reported that the water was safe to swim in, but not to consume. When my wife and I bought this property, we were drawn to the serenity of the wildlife at the river, the clear waters, and the dinosaur tracks that you can see under the water. We bought this place with the idea of enjoying the river with our young boys, ages 5 and 2 years old. Indeed, they love being at the river and exploring the land. And as much as I tell them, even now, not to drink the water, they're kids, and they drink some of the water. They swim and inadvertently get water in their mouths. I don't see how it would be safe for them to be swimming in the water if concentrated effluent is going to be emptying into the river at the start of our property.

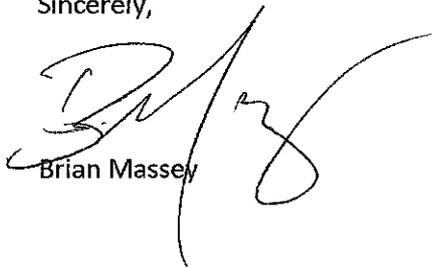
MWD

I believe that that the effluent will also adversely affect the financial and pragmatic value of my property. An article published by the Liberty Hill newspaper on June 6, 2013, reported the impact of the existing waste treatment facility in Liberty Hill that dumps into the South San Gabriel River. Things that concern me are the change in quality of the land itself, including the foul smell and the change from clear waters to algae infested waters with a green film on top. This type of change would make it hard to enjoy the beauty of the river and the wildlife, one of the main reasons that we wanted to live here. It would take away the clear waters that have defined the North San Gabriel River, as documented as early as 1779, when "Athanasie de Mezieres wrote of it, 'Few rivers can compare with the San Xavier in the clearness of its waters or in the abundance of fish...'" (quoted from the Williamson County Historical Commission regarding the historic marker of the North San Gabriel River).

Outside of the impacts on my property, I am concerned about the safety of drinking water for my family and other residents who get their water from Lake Georgetown, including the City of Georgetown, the City of Round Rock, Brushy Creek MUD, and Chisholm Trail SUD, as the undiluted effluent will empty into the river just upstream from the water source. I'm concerned for the many families who come to the US Army Corps of Engineers Camp Tejas at Lake Georgetown, about 1200 meters from where the effluent will be joining the North San Gabriel, as I would imagine that they wouldn't enjoy the river as they have in the past. Fishing won't be the same. Swimming in clear waters won't be the same, as well as having to worry even more so about potentially getting a mouthful of water when in the water. We were informed at the meeting on May 14<sup>th</sup> that the effluent discharge will translate into about 2 cubic feet per second of flow. Currently, the flow rate of the North San Gabriel River is listed as between 0.0-0.05 cubic feet per second (per USGS.gov). Historically, graphing data from USGS.gov, it looks like the flow rate has maintained (aside from transient periods after a big rain) at just under 1 cubic foot per second flow dating back to October 1, 2007 (as far back as the program will allow). It would seem, then, that the amount of flow coming in from Soves Branch would be expected to make up a significant amount of the water flowing from that point on as part of the North San Gabriel River.

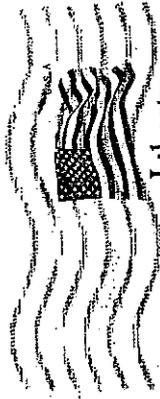
I thank you for your time in reading this letter, and I would appreciate a contested case hearing in this matter.

Sincerely,



Brian Massey

Brian Massey  
3701 CC 258  
Liberty Hill TX 78642



Liberty  
FOREVER 1

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2013 AUG 13

CHIEF CLERKS OFFICE

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AUG 13 2013

Office of the Chief Clerk - MC 105

TCEQ

P.O. Box 13087

Austin, TX 78711-3087 TCEQ MAIL CENTER  
MM



78711308787

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, August 12, 2013 8:25 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015000001  
**Attachments:** Contested Case Hearing Letter.docx

H

**From:** bmass8@yahoo.com [mailto:bmass8@yahoo.com]  
**Sent:** Sunday, August 11, 2013 9:37 PM  
**To:** donotReply@tceq.state.tx.us  
**Subject:** Public comment on Permit Number WQ0015000001

*mwd  
76586*

**REGULATED ENTY NAME** WILLIAMSON COUNTY MUD 19 - SANTA RITA UPPER MIDDLEBROOK WWTP

**RN NUMBER:** RN106076862

**PERMIT NUMBER:** WQ0015000001

**DOCKET NUMBER:**

**COUNTY:** WILLIAMSON

**PRINCIPAL NAME:** WILLIAMSON COUNTY MUD 19

**CN NUMBER:** CN603045691

**FROM**

**NAME:** Brian Massey

**E-MAIL:** [bmass8@yahoo.com](mailto:bmass8@yahoo.com)

**COMPANY:**

**ADDRESS:** 3701 COUNTY ROAD 258  
LIBERTY HILL TX 78642-4751

**PHONE:** 5128102966

**FAX:**

**COMMENTS:** August 11, 2013 Brian and Cara Massey 3701 CR 258 Liberty Hill, TX 78642 512-810-2966 512-810-2955 Office of the Chief Clerk, MC 105 TECQ PO Box 13087 Austin, TX 78711-3087 Dear Chief Clerk, I am writing to request a contested case hearing regarding Permit for Municipal Wastewater #

*mw*

WQ0015000001. The applicant is Williamson County MUD 19. I am making this request because of my belief that my property and family will be negatively affected by this facility and its discharge. My property is located at the above address. The affected area of my property lies approximately 3500 meters from the proposed location of the facility. The northern-most portion of my property begins where Sowes Branch joins into the North San Gabriel River, continuing east along the river. It is my belief that the proposed facility and the effluent discharge from it, will adversely affect my property and the health of my family. The creek that the effluent is proposed to discharge into, Sowes Branch, is an intermittent stream, running with water only after a good rain. Most of the time, it is dry. As such, the effluent would be hitting the North San Gabriel essentially undiluted from its 3500 meter journey along Sowes Branch. I have a concern about the health of my family, as sewage treatment facilities are known to not remove pharmaceuticals in the waste water, including hormones, anti-seizure medicines, and psychoactive medications. It is not yet known what the potential effects might be on humans, but there is concern in the research community about the long-term impacts. Additionally, at the public meeting held May 14th, it was reported that the water was safe to swim in, but not to consume. When my wife and I bought this property, we were drawn to the serenity of the wildlife at the river, the clear waters, and the dinosaur tracks that you can see under the water. We bought this place with the idea of enjoying the river with our young boys, ages 5 and 2 years old. Indeed, they love being at the river and exploring the land. And as much as I tell them, even now, not to drink the water, they're kids, and they drink some of the water. They swim and inadvertently get water in their mouths. I don't see how it would be safe for them to be swimming in the water if concentrated effluent is going to be emptying into the river at the start of our property. I believe that the effluent will also adversely affect the financial and pragmatic value of my property. An article published by the Liberty Hill newspaper on June 6, 2013, reported the impact of the existing waste treatment facility in Liberty Hill that dumps into the South San Gabriel River. Things that concern me are the change in quality of the land itself, including the foul smell and the change from clear waters to algae infested waters with a green film on top. This type of change would make it hard to enjoy the beauty of the river and the wildlife, one of the main reasons that we wanted to live here. It would take away the clear waters that have defined the North San Gabriel River, as documented as early as 1779, when "Athanasie de Mezieres wrote of it, 'Few rivers can compare with the San Xavier in the clearness of its waters or in the abundance of fish...'" (quoted from the Williamson County Historical Commission regarding the historic marker of the North San Gabriel River). Outside of the impacts on my property, I am concerned about the safety of drinking water for my family and other residents who get their water from Lake Georgetown, including the City of Georgetown, the City of Round Rock, Brushy Creek MUD, and Chisholm Trail SUD, as the undiluted effluent will empty into the river just upstream from the water source. I'm concerned for the many families who come to the US Army Corps of Engineers Camp Tejas at Lake Georgetown, about 1200 meters from where the effluent will be joining the North San Gabriel, as I would imagine that they wouldn't enjoy the river as they have in the past. Fishing won't be the same. Swimming in clear waters won't be the same, as well as having to worry even more so about potentially getting a mouthful of water when in the water. We were informed at the meeting on May 14th that the effluent discharge will translate into about 2 cubic feet per second of flow. Currently, the flow rate of the North San Gabriel River is listed as between 0.0-0.05 cubic feet per second (per USGS.gov). Historically, graphing data from USGS.gov, it looks like the flow rate has maintained (aside from transient periods after a big rain) at just under 1 cubic foot per second flow dating back to October 1, 2007 (as far back as the program will allow). It would seem, then, that the amount of flow coming in from Sowes Branch would be expected to make up a significant amount of the water flowing from that point on as part of the North San Gabriel River. I thank you for your time in reading this letter, and I would appreciate a contested case hearing in this matter.

Sincerely, Brian Massey

June 11, 2013

Brian and Cara Massey  
3701 CR 258  
Liberty Hill, TX 78642  
512-810-2966  
512-810-2955

Office of the Chief Clerk, MC 105  
TECQ  
PO Box 13087  
Austin, TX 78711-3087

Dear Chief Clerk,

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I thank you for your time in reading this letter, and I would appreciate a contested case hearing in this matter.

Sincerely,

Brian Massey

TCEQ Public Meeting Form  
May 14, 2013

Williamson County MUD No. 19  
TPDES Permit No. WQ0015000001

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MAY 14 2013

AT PUBLIC MEETING

PLEASE PRINT

Name: Brian Massey

Mailing Address: 3701 CR 258, Liberty Hill, TX 78642

Physical Address (if different): \_\_\_\_\_

City/State: Liberty Hill, TX Zip: 78642

\*\*This information is subject to public disclosure under the Texas Public Information Act\*\*

Email: bmass8@yahoo.com ✓

Phone Number: (512) 810 - 2966

• Are you here today representing a municipality, legislator, agency, or group?  Yes  No  
If yes, which one? \_\_\_\_\_

Please add me to the mailing list. ✓

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.

(Written comments may be submitted at any time during the meeting)

on back  
mmu

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



① I have a concern about the discharge going into the drinking water, both in the Lake Georgetown and potentially into the ground water.

② I have a concern of the impact of this discharge on the water quality on the family park at Camp Tejas, a very popular area for swimming and fishing.

RECEIVED

MAY 14 2013

~~③ I have a concern of the impact~~

③ I would like for other waste water options to be considered that wouldn't have the impact on homeowners and those who enjoy using the river/lake. Most of the current residents in this area are using septic systems. It seems that this sewage plant is not needed.

AT PUBLIC MEETING

④ There was a comment raised tonight about the discharge going into a recharge zone. It sounds like there is conflicting information about whether or not this is accurate. I would like to request that this issue be looked into further.

⑤ I have a concern of algae overgrowth. An excerpt from the website for Williamson County on the historical marker of the North San Gabriel discussed: "Few rivers can compare with the San Xavier [San Gabriel] in the clearness of its waters or in the abundance of fish." This, I would expect, would undoubtedly change.

⑥ I have a concern of the impact on this discharge flow on the current river system <sup>(erosion)</sup>. Currently, the flow rate is at 0.4 cubic feet per second, about 1/5 the rate that is projected to be flowing from the discharge.

⑦ I have a concern of the impact of the odor from the plant.

⑧ I request that this permit be denied.

on

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, August 12, 2013 4:50 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015000001

H

**From:** [arodriguez@txadminlaw.com](mailto:arodriguez@txadminlaw.com) [<mailto:arodriguez@txadminlaw.com>]  
**Sent:** Monday, August 12, 2013 4:07 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015000001

*mud  
76586*

**REGULATED ENTY NAME** WILLIAMSON COUNTY MUD 19 - SANTA RITA UPPER MIDDLEBROOK WWTP

**RN NUMBER:** RN106076862

**PERMIT NUMBER:** WQ0015000001

**DOCKET NUMBER:**

**COUNTY:** WILLIAMSON

**PRINCIPAL NAME:** WILLIAMSON COUNTY MUD 19

**CN NUMBER:** CN603045691

**FROM**

**NAME:** ARTURO RODRIGUEZ

**E-MAIL:** [arodriguez@txadminlaw.com](mailto:arodriguez@txadminlaw.com)

**COMPANY:** Russell & Rodriguez

**ADDRESS:** 1633 WILLIAMS DR STE 200  
GEORGETOWN TX 78628-3659

**PHONE:** 5129301317

**FAX:** 8669291641

**COMMENTS:** I submit these comments on behalf of the City of Georgetown, Texas ("City" or "Georgetown") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19") and the draft permit issued by staff. The City hereby requests a contested case hearing on the

*mud*

Application and the draft permit. In accordance with the published notice, the City provides the following information: 1. and 2. Your name, address, phone number: The City may be notified of any developments in this case by providing notice to: Arturo D. Rodriguez, Jr. Russell & Rodriguez, LLP 1633 Williams Drive, Suite 200 Georgetown, Texas 78628 (512) 930-1317 (866) 929-1641 (Fax) 3. Applicant information: Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ001500001 in Williamson County, Texas. 4. The proposed facility is located approximately 1.5 miles from the City's corporate limits and approximately 0.75 miles from the City's extraterritorial jurisdiction. The City owns five wastewater treatment facilities operated by the Brazos River Authority and owns three water treatment facilities operated by CH2M - OMI. The City's primary water treatment facility draws from Lake Georgetown at a point which is 7 miles downstream from the discharge point contemplated in the Application. The proposed plant is located approximately 3 miles from a wastewater treatment plant which is part of the regional wastewater plan and is currently owned by the City of Liberty Hill and operated by the Brazos River Authority ("LHWWTP"). The City understands that a transmission main from the property the proposed facility seeks to service already exists and extends to the LHWWTP. Thus, there is no need for the proposed facility. The plant is also located approximately 4 miles from Georgetown's Cimarron Hills WWTP. The City has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, as other providers in the area have the ability to serve the Applicant's property. Again, there is no need for the proposed facility. The City is concerned with the operation of an unnecessary treatment facility, that does not conform to the regional plan, whose owner has no experience with the operations of such a facility with stringent limits imposed upon the effluent necessary to protect the Edwards Aquifer and Lake Georgetown, and the operation of such facility by operating outside of the regional planning effort could result in unnecessary impact to water quality of the primary drinking water supply of the City. Thus, it is not in the public interest for the agency to issue a new discharge authorization when regionalized wastewater services are available. The effluent from the discharge point will eventually make it to Lake Georgetown, much of which is located within the corporate limits of the City. Lake Georgetown is a key recreational resource for the City, its residents, and the public at large. The City is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, the City is concerned with algae blooms that can occur because of the plant. The City requests a contested case hearing on the application.

TCEQ Public Meeting Form  
May 14, 2013

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Williamson County MUD No. 19  
TPDES Permit No. WQ0015000001

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MAY 14 2013

PLEASE PRINT

Name: ART Rodriguez

AT PUBLIC MEETING

Mailing Address: 1633 Williams Dr #200, Georgetown Tx  
78628

Physical Address (if different): \_\_\_\_\_

City/State: \_\_\_\_\_ Zip: \_\_\_\_\_

\*\*This information is subject to public disclosure under the Texas Public Information Act\*\*

Email: arodriguez@txadminlaw.com

Phone Number: 5129301317

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

If yes, which one? City of Georgetown

Please add me to the mailing list. ✓

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

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 form to the person at the information table. Thank you.

mm

**R&R**  
RUSSELL & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

4

1633 WILLIAMS DRIVE  
BUILDING 2, SUITE 200  
GEORGETOWN, TEXAS 78628

Email: arodriguez@txadminlaw.com

PHONE (512) 930-1317  
FAX (866) 929-1641  
WWW.TXADMINLAW.COM

October 31, 2012

**Via Electronic Filing**

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

**RECEIVED**  
MAY 14 2013  
**AT PUBLIC MEETING**

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To the Texas Commission on Environmental Quality:

The undersigned represents the City of Georgetown, Texas ("City" or "Georgetown") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19") and the draft permit issued by staff. The City hereby requests a public meeting and a contested case hearing on the Application and the draft permit. In accordance with the published notice, the City provides the following information:

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

Arturo D. Rodriguez, Jr.  
Russell & Rodriguez, LLP  
1633 Williams Drive, Suite 200  
Georgetown, Texas 78628  
(512) 930-1317  
(866) 929-1641 (Fax)

2. *Applicant information:* Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.
3. *The location and distance of your property/activities relative to the proposed facility:*

The proposed facility is located approximately 1.5 miles from the City's corporate limits and approximately 0.75 miles from the City's extraterritorial jurisdiction.

MUD

MAY 14 2013

AT PUBLIC MEETING

4. *Specific description of how you would be adversely affected by the facility in a way not common to the general public:*

The City owns five wastewater treatment facilities operated by the Brazos River Authority and owns three water treatment facilities operated by CH2M - OMI. The City's primary water treatment facility draws from Lake Georgetown at a point which is 7 miles downstream from the discharge point contemplated in the Application.

The proposed plant is located approximately 3 miles from a wastewater treatment plant which is part of the regional wastewater plan and is currently owned by the City of Liberty Hill and operated by the Brazos River Authority ("LHWWTP"). The City understands that a transmission main from the property the proposed facility seeks to service already exists and extends to the LHWWTP. Thus, there is no need for the proposed facility. The plant is also located approximately 4 miles from Georgetown's Cimarron Hills WWTP. The City has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, as other providers in the area have the ability to serve the Applicant's property. Again, there is no need for the proposed facility.

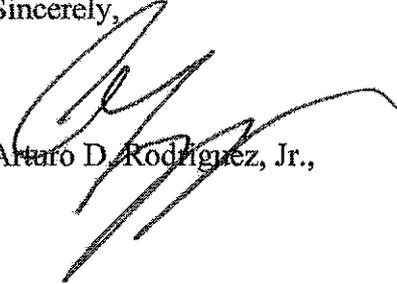
The City is concerned with the operation of an unnecessary treatment facility, that does not conform to the regional plan, whose owner has no experience with the operations of such a facility with stringent limits imposed upon the effluent necessary to protect the Edwards Aquifer and Lake Georgetown, and the operation of such facility by operating outside of the regional planning effort could result in unnecessary impact to water quality of the primary drinking water supply of the City. Thus, it is not in the public interest for the agency to issue a new discharge authorization when regionalized wastewater services are available.

The effluent from the discharge point will eventually make it to Lake Georgetown, much of which is located within the corporate limits of the City. Lake Georgetown is a key recreational resource for the City, its residents, and the public at large. The City is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, the City is concerned with algae blooms that can occur because of the plant.

5. The City requests a public meeting and a contested case hearing on the application. The City requests that a public meeting be held on this matter in Sun City in Georgetown. Sun City has a facility capable of accommodating the number of people interested in WCMUD 19's Application.

If I may be of further assistance, please contact me at the number above.

Sincerely,

  
Arturo D. Rodriguez, Jr.,

cc: Mr. Jim Briggs  
Mr. Glenn Dishong  
Ms. Bridget Chapman

**RECEIVED**

MAY 14 2013

**AT PUBLIC MEETING**

**Marisa Weber**

---

**From:** PUBCOMMENT  
**Sent:** Tuesday, November 06, 2012 1:27 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015000001  
**Attachments:** 121031 1941 Protest of MUD 191.pdf

*MUD  
76581e*

PM  
H

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, November 06, 2012 12:25 PM  
**To:** PUBCOMMENT  
**Subject:** FW: Public comment on Permit Number WQ0015000001

**From:** [arodriguez@txadminlaw.com](mailto:arodriguez@txadminlaw.com) [mailto:[arodriguez@txadminlaw.com](mailto:arodriguez@txadminlaw.com)]  
**Sent:** Tuesday, November 06, 2012 11:05 AM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015000001

**REGULATED ENTY NAME** WILLIAMSON COUNTY MUD 19 - SANTA RITA UPPER  
MIDDLEBROOK WWTP

**RN NUMBER:** RN106076862

**PERMIT NUMBER:** WQ0015000001

**DOCKET NUMBER:**

**COUNTY:** WILLIAMSON

**PRINCIPAL NAME:** WILLIAMSON COUNTY MUD 19

**CN NUMBER:** CN603045691

**FROM**

**NAME:** MR Arturo Rodriguez, JR

**E-MAIL:** [arodriguez@txadminlaw.com](mailto:arodriguez@txadminlaw.com)

**COMPANY:** Russell & Rodriguez LLP

**ADDRESS:** 1633 WILLIAMS DR Suite 200  
GEORGETOWN TX 78628-3659

*RM*

**PHONE:** 5129301317

**FAX:** 8669291641

**COMMENTS:** The undersigned represents 1941 Limited ("1941") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as 1941's notice of its request for a contested case hearing and its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19"). In accordance with the published notice, 1941 provides the following information: 1. Your name, address, phone number: The City may be notified of any developments in this case by providing notice to: Arturo D. Rodriguez, Jr. Kerry E. Russell Russell & Rodriguez, LLP 1633 Williams Drive, Suite 200 Georgetown, Texas 78628 (512) 930-1317 (866) 929-1641 (Fax) 2. Applicant information: Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas. 3. The location and distance of your property/activities relative to the proposed facility: The proposed facility is located approximately one mile from 1941's property. 1941 owns the property immediately adjacent to the property proposed to be served by the facility. 4. Specific description of how you would be adversely affected by the facility in a way not common to the general public: The proposed facility is close to the Edwards Aquifer Recharge Zone. 1941 is concerned with the Application's impact on groundwater. 1941 is concerned that the effluent limits are not properly protective of an important water supply. The likely impact of the proposed plant is to degrade the quality of area water supply wells. 1941 is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, 1941 is concerned with algae blooms that can occur because of the plant. The proposed plant is located approximately 3 miles from a regional plant currently operated by the Lower Colorado River Authority. 1941 has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, since MUD 19 has a contract with LCRA to serve this property and has recently completed an interceptor line from this property to the LCRA regional plant. An additional wastewater treatment facility within this area is not necessary and may result in nuisance odors, water quality impacts, and other environmental concerns. It is not in the public interest for the TCEQ to issue a new discharge authorization when regionalized wastewater service is available. 1941 understands that MUD 19 has never operated a wastewater treatment facility. 1941 is concerned that the operation of the facility by MUD 19 will not adequately protect the environment. 5. 1941 requests a public meeting and a contested case hearing on the application. If I may be of further assistance, please contact me at the number above. Sincerely, Arturo D. Rodriguez, Jr.

**R&R**  
RUSSELL & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

1633 WILLIAMS DRIVE  
BUILDING 2, SUITE 200  
GEORGETOWN, TEXAS 78628

PHONE (512) 930-1317  
FAX (866) 929-1641  
WWW.TXADMINLAW.COM

Email: arodriguez@txadminlaw.com

November 5, 2012

**Via Electronic Filing**

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To the Texas Commission on Environmental Quality:

The undersigned represents 1941 Limited ("1941") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as 1941's notice of its request for a contested case hearing and its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19"). In accordance with the published notice, 1941 provides the following information:

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

Arturo D. Rodriguez, Jr.  
Kerry E. Russell  
Russell & Rodriguez, LLP  
1633 Williams Drive, Suite 200  
Georgetown, Texas 78628  
(512) 930-1317  
(866) 929-1641 (Fax)

2. *Applicant information:* Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.

3. *The location and distance of your property/activities relative to the proposed facility:*

The proposed facility is located approximately one mile from 1941's property. 1941 owns the property immediately adjacent to the property proposed to be served by the facility.

4. *Specific description of how you would be adversely affected by the facility in a way not common to the general public:*

The proposed facility is close to the Edwards Aquifer Recharge Zone. 1941 is concerned with the Application's impact on groundwater. 1941 is concerned that the effluent limits are not properly protective of an important water supply. The likely impact of the proposed plant is to degrade the quality of area water supply wells.

1941 is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, 1941 is concerned with algae blooms that can occur because of the plant.

The proposed plant is located approximately 3 miles from a regional plant currently operated by the Lower Colorado River Authority. 1941 has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, since MUD 19 has a contract with LCRA to serve this property and has recently completed an interceptor line from this property to the LCRA regional plant.

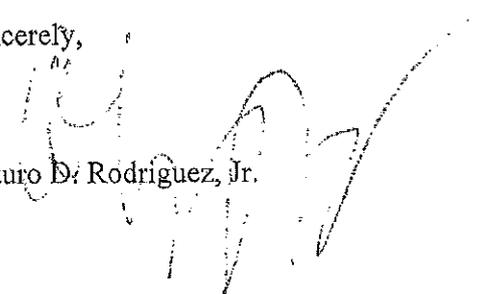
An additional wastewater treatment facility within this area is not necessary and may result in nuisance odors, water quality impacts, and other environmental concerns. It is not in the public interest for the TCEQ to issue a new discharge authorization when regionalized wastewater service is available.

1941 understands that MUD 19 has never operated a wastewater treatment facility. 1941 is concerned that the operation of the facility by MUD 19 will not adequately protect the environment.

5. 1941 requests a public meeting and a contested case hearing on the application.

If I may be of further assistance, please contact me at the number above.

Sincerely,

  
Arturo D. Rodriguez, Jr.

cc: Mr. Sam Pfister

**R&R**  
RUSSELL & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

1633 WILLIAMS DRIVE  
BUILDING 2, SUITE 200  
GEORGETOWN, TEXAS 78628

Email: arodriguez@txadminlaw.com

PHONE (512) 930-1317  
FAX (866) 929-1641  
WWW.TXADMINLAW.COM

October 31, 2012

**Via Electronic Filing**

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To the Texas Commission on Environmental Quality:

The undersigned represents the City of Georgetown, Texas ("City" or "Georgetown") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19") and the draft permit issued by staff. The City hereby requests a public meeting and a contested case hearing on the Application and the draft permit. In accordance with the published notice, the City provides the following information:

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

Arturo D. Rodriguez, Jr.  
Russell & Rodriguez, LLP  
1633 Williams Drive, Suite 200  
Georgetown, Texas 78628  
(512) 930-1317  
(866) 929-1641 (Fax)

2. *Applicant information:* Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.
3. *The location and distance of your property/activities relative to the proposed facility:*

The proposed facility is located approximately 1.5 miles from the City's corporate limits and approximately 0.75 miles from the City's extraterritorial jurisdiction.

4. *Specific description of how you would be adversely affected by the facility in a way not common to the general public:*

The City owns five wastewater treatment facilities operated by the Brazos River Authority and owns three water treatment facilities operated by CH2M - OMI. The City's primary water treatment facility draws from Lake Georgetown at a point which is 7 miles downstream from the discharge point contemplated in the Application.

The proposed plant is located approximately 3 miles from a wastewater treatment plant which is part of the regional wastewater plan and is currently owned by the City of Liberty Hill and operated by the Brazos River Authority ("LHWWTP"). The City understands that a transmission main from the property the proposed facility seeks to service already exists and extends to the LHWWTP. Thus, there is no need for the proposed facility. The plant is also located approximately 4 miles from Georgetown's Cimarron Hills WWTP. The City has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, as other providers in the area have the ability to serve the Applicant's property. Again, there is no need for the proposed facility.

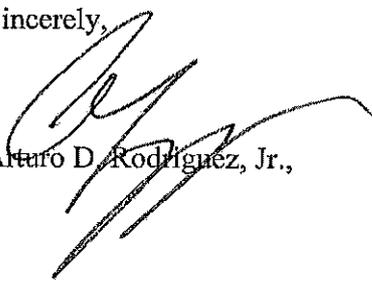
The City is concerned with the operation of an unnecessary treatment facility, that does not conform to the regional plan, whose owner has no experience with the operations of such a facility with stringent limits imposed upon the effluent necessary to protect the Edwards Aquifer and Lake Georgetown, and the operation of such facility by operating outside of the regional planning effort could result in unnecessary impact to water quality of the primary drinking water supply of the City. Thus, it is not in the public interest for the agency to issue a new discharge authorization when regionalized wastewater services are available.

The effluent from the discharge point will eventually make it to Lake Georgetown, much of which is located within the corporate limits of the City. Lake Georgetown is a key recreational resource for the City, its residents, and the public at large. The City is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, the City is concerned with algae blooms that can occur because of the plant.

5. The City requests a public meeting and a contested case hearing on the application. The City requests that a public meeting be held on this matter in Sun City in Georgetown. Sun City has a facility capable of accommodating the number of people interested in WCMUD 19's Application.

If I may be of further assistance, please contact me at the number above.

Sincerely,



Arturo D. Rodriguez, Jr.,

cc: Mr. Jim Briggs  
Mr. Glenn Dishong  
Ms. Bridget Chapman

**Marisa Weber**

---

**From:** PUBCOMMENT  
**Sent:** Thursday, November 01, 2012 9:22 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015000001  
**Attachments:** Ltr121031 ADR Protest of MUD 19 TPDES permit application.pdf

*MWD  
FUSE*

PM  
H

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, November 01, 2012 8:33 AM  
**To:** PUBCOMMENT  
**Subject:** FW: Public comment on Permit Number WQ0015000001

**From:** [arodriguez@txadminlaw.com](mailto:arodriguez@txadminlaw.com) [<mailto:arodriguez@txadminlaw.com>]  
**Sent:** Wednesday, October 31, 2012 2:58 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015000001

**REGULATED ENTY NAME** WILLIAMSON COUNTY MUD 19 - SANTA RITA UPPER  
MIDDLEBROOK WWTP

**RN NUMBER:** RN106076862

**PERMIT NUMBER:** WQ0015000001

**DOCKET NUMBER:**

**COUNTY:** WILLIAMSON

**PRINCIPAL NAME:** WILLIAMSON COUNTY MUD 19

**CN NUMBER:** CN603045691

**FROM**

**NAME:** MR Arturo David Rodriguez, JR

**E-MAIL:** [arodriguez@txadminlaw.com](mailto:arodriguez@txadminlaw.com)

**COMPANY:** Russell & Rodriguez LLP

**ADDRESS:** 1633 WILLIAMS DR Suite 200  
GEORGETOWN TX 78628-3659

*Mr*

**PHONE:** 5129301317

**FAX:** 8669291641

**COMMENTS:** Request for contested case hearing.



**R&R**  
 RUSSELL & RODRIGUEZ, L.L.P.  
 ATTORNEYS AT LAW

1633 WILLIAMS DRIVE  
 BUILDING 2, SUITE 200  
 GEORGETOWN, TEXAS 78628

Email: arodriguez@txadminlaw.com

PM OPA HR  
 APR 07 2011  
 By DN

PHONE (512) 930-1317  
 FAX (866) 929-1641  
 WWW.TXADMINLAW.COM

April 6, 2011

**Via Facsimile and Hand-Delivery**

Texas Commission on Environmental Quality  
 Water Supply Division  
 Utilities and Districts Section, MC-153  
 P.O. Box 13087  
 Austin, Texas 78711-3087

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To the Texas Commission on Environmental Quality:

The undersigned represents the City of Georgetown, Texas ("City") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19") and its request for a public meeting and a contested case hearing. In accordance with the published notice, the City provides the following information.

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

Arturo D. Rodriguez, Jr.  
 Kerry E. Russell  
 Russell & Rodriguez, LLP  
 1633 Williams Drive, Suite 200  
 Georgetown, Texas 78628  
 (512) 930-1317  
 (866) 929-1641 (Fax)

2. *Applicant information: Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.*

## Texas Commission on Environmental Quality

April 6, 2011

Page 2 of 3

3. *The location and distance of your property/activities relative to the proposed facility:*

The proposed facility is located approximately 1.5 miles from the City's corporate limits and approximately 0.75 miles from the City's extraterritorial jurisdiction.

4. Specific description of how you would be adversely affected by the facility in a way not common to the general public:

The City owns five wastewater treatment facilities operated by the Brazos River Authority and owns three water treatment facilities operated by CH2M - OMI. The City's primary water treatment facility draws from Lake Georgetown at a point which is 7 miles downstream from the discharge point contemplated in the Application.

The proposed plant is located approximately 3 miles from a wastewater treatment plant which is part of the regional wastewater plan and is currently owned by the Lower Colorado River Authority and operated by the Brazos River Authority ("LCRA WWTP"). The City understands that a transmission main from the property the proposed facility seeks to service already exists and extends to the LCRA WWTP. Thus, there is no need for the proposed facility. The plant is also located approximately 4 miles from Georgetown's Cimarron Hills WWTP. The City has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, as other providers in the area have the ability to serve the Applicant's property. Again, there is no need for the proposed facility.

The City is concerned with the operation of an unnecessary treatment facility, that does not conform to the regional plan, whose owner has no experience with the operations of such a facility with stringent limits imposed upon the effluent necessary to protect the Edwards Aquifer and Lake Georgetown, and the operation of such facility by operating outside of the regional planning effort could result in unnecessary impact to water quality of the primary drinking water supply of the City. Thus, it is not in the public interest for the agency to issue a new discharge authorization when regionalized wastewater services are available.

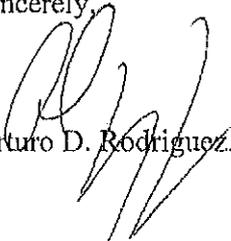
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5. The City requests a public meeting and a contested case hearing on the application. The City requests that a public meeting be held on this matter in late April in Sun City in Georgetown. Sun City has a facility capable of accommodating the number of people interested in WCMUD 19's application.

Texas Commission on Environmental Quality  
April 6, 2011  
Page 3 of 3

If I may be of further assistance, please contact me at the number above.

Sincerely,

  
Arturo D. Rodriguez, Jr.,

cc: Mr. Paul Brandenburg  
Mr. Jim Briggs  
Mr. Glen Dishong  
Mr. Mark Sokolow

RUSSELL & RODRIGUEZ, L.L.P.

Attorneys at Law

1633 Williams Drive, Building 2, Suite 200, Georgetown, Texas 78628

Phone (512) 930-1317

E-mail: arodriguez@txadminlaw.com

Fax (866) 929-1641

FACSIMILE COVER PAGE

April 6, 2011

Please Deliver the Following page(s) to

TCEQ Water Supply Division	Fax Number:	(512) 239-6972
TCEQ Chief Clerk	Fax Number:	(512) 239-3301
Mr. Paul Brandenburg	Fax Number:	(512) 930-3622
Mr. Jim Briggs	Fax Number:	(512) 930-3622
Mr. Glen Dishong	Fax Number:	(512) 930-3599
Mr. Mark Sokolow	Fax Number:	(512) 931-7657

Client No.: 170-07

From: Art Rodriguez

Direct Phone (512) 930-1317

Pages: 4 (Including Cover Sheet)

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

Comments: Notice of Opposition to Application Submitted by Williamson County MUD 19.

2011 APR - 6 PM 2:45  
 CHIEF CLERKS OFFICE  
 TEXAS COMMISSION  
 ON ENVIRONMENTAL  
 QUALITY

PM  
#

OPA  
APR 07 2011

BY RS

1633 WILLIAMS DRIVE  
BUILDING 2, SUITE 200  
GEORGETOWN, TEXAS 78628

PHONE (512) 930-1317  
FAX (866) 929-1641  
WWW.TXADMINLAW.COM

Email: arodriguez@txadminlaw.com ✓

April 6, 2011

**Via Facsimile and Hand-Delivery**

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

MWD  
715897

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2011 APR -6 PM 3:37  
CHIEF CLERKS OFFICE

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To the Texas Commission on Environmental Quality:

The undersigned represents the City of Georgetown, Texas ("City") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19") and its request for a public meeting and a contested case hearing. In accordance with the published notice, the City provides the following information:

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

- ✓ Arturo D. Rodriguez, Jr.
- ✓ Kerry E. Russell  
Russell & Rodriguez, LLP  
1633 Williams Drive, Suite 200  
Georgetown, Texas 78628  
(512) 930-1317  
(866) 929-1641 (Fax)

2. Applicant information: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.*

MWD

3. *The location and distance of your property/activities relative to the proposed facility:*

The proposed facility is located approximately 1.5 miles from the City's corporate limits and approximately 0.75 miles from the City's extraterritorial jurisdiction.

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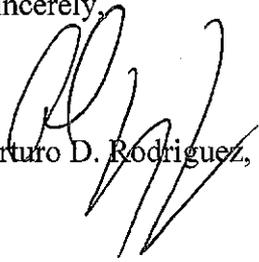
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If I may be of further assistance, please contact me at the number above.

Sincerely,

  
Arturo D. Rodriguez, Jr.,

cc: Mr. Paul Brandenburg  
Mr. Jim Briggs  
Mr. Glen Dishong  
Mr. Mark Sokolow



3. The location and distance of your property/activities relative to the proposed facility:

The proposed facility is located approximately one mile from 1941's property. 1941 owns the property immediately adjacent to the property proposed to be served by the facility.

4. Specific description of how you would be adversely affected by the facility in a way not common to the general public:

The proposed facility is close to the Edwards Aquifer Recharge Zone. 1941 is concerned with the Application's impact on groundwater. 1941 is concerned that the effluent limits are not properly protective of an important water supply and concerned with whether the design of the plant can adequately treat water. The likely impact of the proposed plant is to degrade the quality of the water supply wells.

The City is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, the City is concerned with algae blooms downstream that can occur because of the plant.

The proposed plant is located approximately 3 miles from a plant currently operated by the LCRA. 1941 has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, since MUD 19 has a contract with LCRA to serve this and has recently completed an interceptor line from its property to the LCRQ regional plant.

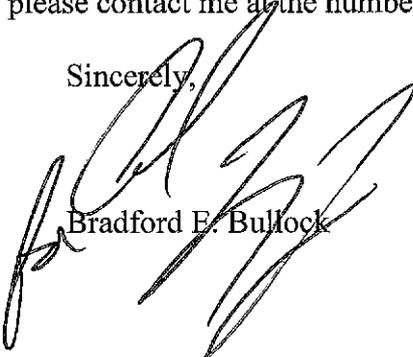
An additional treatment facility within this area is not necessary and may result in nuisance odors, water quality impacts, and other environmental concerns. It is not in the public interest for the TCEQ to issue a new discharge authorization when regionalized wastewater services may be available.

1941 understands that MUD 19 has never operated a wastewater treatment facility. 1941 is concerned that the operation of the facility by MUD 19 will not adequately protect the environment.

5. 1941 requests a public meeting and a contested case hearing on the application.

If I may be of further assistance, please contact me at the number above.

Sincerely,



Bradford E. Bullock

cc: Mr. Sam Pfister

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

RUSSELL & RODRIGUEZ, L.L.P.

Attorneys at Law

1633 Williams Drive, Bldg. 2, Suite 200, Georgetown, Texas 78628

Phone (512) 930-1317

E-mail: [bbullock@txadminlaw.com](mailto:bbullock@txadminlaw.com)

Fax (866) 929-1641

CHIEF CLERKS OFFICE

FACSIMILE COVER PAGE

March 31, 2011

H  
PM

OPA

APR 05 2011

BY DS

Please Deliver the Following page(s) to:

Water Supply Division

Fax Number

(512) 239-2214

Client Number: 540-00

From: Bradford E. Bullock

Direct Phone: (512) 930-1317

Pages: (Including Cover Sheet)

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

Comments:

1941, Limited's Notice of its request for a contested case hearing and opposition to the Application

MWD  
74586

RECEIVED

MAR 31 2011

WATER QUALITY DIVISION  
TCEQ

RECEIVED  
TCEQ  
WATER SUPPLY DIV.  
2011 MAR 31 AM 10 05

*Handwritten signature*

**R&R**  
RUSSELL & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

1633 WILLIAMS DRIVE  
BUILDING 2, SUITE 200  
GEORGETOWN, TEXAS 78628

PHONE (512) 930-1317  
FAX (866) 929-1641  
WWW.TXADMINLAW.COM

Email: arodriguez@txadminlaw.com

March 31, 2011

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2011 APR -4 PM 3:21  
CHIEF CLERKS OFFICE

**Via Facsimile and Hand-Delivery**

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To the Texas Commission on Environmental Quality:

The undersigned represents 1941 Limited ("1941") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its request for a contested case hearing and its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("MUD 19"). In accordance with the published notice, 1941 provides the following information:

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

Bradford E. Bullock  
Kerry E. Russell  
Russell & Rodriguez, LLP  
1633 Williams Drive, Suite 200  
Georgetown, Texas 78628  
(512) 930-1317  
(866) 929-1641 (Fax)

2. *Applicant information: Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.*

Texas Commission on Environmental Quality  
March 31, 2011  
Page 2 of 2

3. The location and distance of your property/activities relative to the proposed facility:

The proposed facility is located approximately one mile from 1941's property. 1941 owns the property immediately adjacent to the property proposed to be served by the facility.

4. Specific description of how you would be adversely affected by the facility in a way not common to the general public:

The proposed facility is close to the Edwards Aquifer Recharge Zone. 1941 is concerned with the Application's impact on groundwater. 1941 is concerned that the effluent limits are not properly protective of an important water supply and concerned with whether the design of the plant can adequately treat water. The likely impact of the proposed plant is to degrade the quality of the water supply wells.

The City is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, the City is concerned with algae blooms downstream that can occur because of the plant.

The proposed plant is located approximately 3 miles from a plant currently operated by the LCRA. 1941 has concerns that that the proposed facility violates the agency's policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, since MUD 19 has a contract with LCRA to serve this and has recently completed an interceptor line from its property to the LCRQ regional plant.

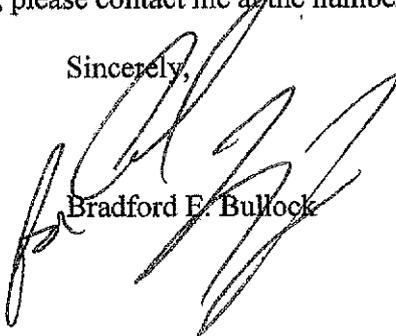
An additional treatment facility within this area is not necessary and may result in nuisance odors, water quality impacts, and other environmental concerns. It is not in the public interest for the TCEQ to issue a new discharge authorization when regionalized wastewater services may be available.

1941 understands that MUD 19 has never operated a wastewater treatment facility. 1941 is concerned that the operation of the facility by MUD 19 will not adequately protect the environment.

5. 1941 requests a public meeting and a contested case hearing on the application.

If I may be of further assistance, please contact me at the number above.

Sincerely,



Bradford E. Bullock

cc: Mr. Sam Pfiester

PM #

OPA

APR 06 2011

RUSSELL & RODRIGUEZ, L.L.P.

Attorneys at Law

1633 Williams Drive, Bldg. 2, Suite 200, Georgetown, Texas 78628

Phone (512) 930-1317

E-mail: krussell@txadminlaw.com ✓

Fax (866) 929-1641

108

FACSIMILE COVER PAGE

March 31, 2011

Please Deliver the Following page(s) to:

Water Supply Division

Fax Number

(512) 239-2214

Client Number: 200-01

From: Kerry E. Russell

Direct Phone: (512) 930-1317

MWD  
70586

Pages: (Including Cover Sheet)

Re: Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas

Comments:

City of Liberty Hill's Notice of its request for a contested case hearing and opposition to the Application

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
2011 APR -4 PM 3:21  
CHIEF CLERKS OFFICE

NOTICE: The following material is intended for the use of the individual or entity to which it is addressed. The material may contain information that is attorney-client privileged, or otherwise confidential and exempt from disclosure under law. If you are not the specified recipient, do not read this material. Any use, dissemination or copying of this material is strictly prohibited. If you have received this material in error, please notify us by telephone at the above number and return to us by U.S. Mail.

MW

TEXAS  
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ON ENVIRONMENTAL  
QUALITY

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2011 APR -4 PM 3:21  
**R&R**  
RUSSELL & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW  
CHIEF CLERKS OFFICE CHIEF CLERKS OFFICE

1633 WILLIAMS DRIVE  
BUILDING 2, SUITE 200  
GEORGETOWN, TEXAS 78628

PHONE (512) 930-1317  
FAX (866) 929-1641  
WWW.TXADMINLAW.COM

Email: krussell@txadminlaw.com

March 30, 2011

**Via Facsimile and Hand-Delivery**

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

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**MAR 31 2011**

**WATER QUALITY DIVISION  
TCEQ**

RECEIVED  
TCEQ  
WATER SUPPLY DIV.  
2011 MAR 31 AM 10 05

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To the Texas Commission on Environmental Quality:

The undersigned represents the City of Liberty Hill, Texas ("City") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its request for a contested case hearing and its opposition to the Application submitted by Williamson County Municipal Utility District No. 19 ("WCMUD 19"). The City requests a contested case hearing regarding WCMUD 19's Application. In accordance with the published notice, the City provides the following information:

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

Kerry E. Russell  
Russell & Rodriguez, LLP  
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Georgetown, Texas 78628  
(512) 930-1317  
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2. *Applicant information: Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.*

Texas Commission on Environmental Quality  
March 30, 2011  
Page 2 of 3

3. The location and distance of your property/activities relative to the proposed facility:

The proposed facility is located approximately 1.5 miles from the City's corporate limits and on property adjacent to the City's extraterritorial jurisdiction.

4. Specific description of how you would be adversely affected by the facility in a way not common to the general public:

The City is concerned with the public health and safety of the residents of the City. The City currently has a pending Application for Sale, Transfer, or Merger of a Retail Public Utility, Application No. 36864-S, before the TCEQ wherein the City seeks to acquire the entirety of the Liberty Hill Water Supply Corporation. Being that the proposed facility is so close to the Edwards Aquifer Recharge Zone, the City is concerned with the Application's impact on groundwater. Potability concerns and health and safety concerns are of paramount importance to the City and its residents. The City is concerned that the effluent limits are not properly protective of an important water supply and concerned with whether the design of the plant can adequately treat wastewater. The likely impact of the proposed plant is to degrade the quality of the water supply wells used by the City's residents.

The City is concerned that the discharge parameters are not stringent enough and may affect aquatic life. Likewise, the City is concerned with algae blooms that can occur because of the plant.

The proposed plant is located approximately 3 miles from the Liberty Hill Regional Wastewater Treatment Facility ("LHRWWTF") currently owned by the Lower Colorado River Authority and operated by the Brazos River Authority. The City is currently negotiating a purchase of the LHRWWTF from the LCRA. The City believes that the proposed facility violates the TCEQ's policy of regionalization found in Texas Water Code § 26.081 since WCMUD 19 currently has a contract with the LCRA for the property to be served by the LHRWWTF. An additional treatment facility within this area is not necessary and may result in nuisance odors, water quality impacts, and other environmental concerns. It is not in the public interest for the TCEQ to issue a new wastewater discharge authorization when regionalized wastewater service is available.

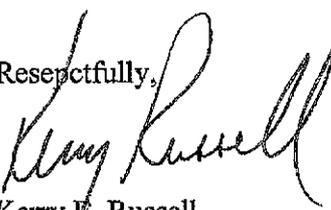
A wastewater transmission main from the WCMUD 19 property already exists and extends to the LHRWWTF. Thus, there is no physical need for the proposed facility.

The City understands that WCMUD 19 has never operated a wastewater treatment facility. The City is concerned that the operations of the facility will not adequately protect the environment.

5. The City requests a public meeting and a contested case hearing on the application.

If I may be of further assistance, please contact me at the number above.

Texas Commission on Environmental Quality  
March 30, 2011  
Page 3 of 3

Respectfully,  
  
Kerry E. Russell

cc: State Senator Steve Ogden  
State Representative Charles Schwertner  
Williamson County Commissioner Cynthia Long  
Mayor Michelle Murphy  
Liberty Hill City Council

PM  
H

CFA

APR 06 2011

**R&R**  
RUSSELL & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

BY RS

2011 APR -4 PM 3: 21

1633 WILLIAMS DRIVE  
BUILDING 2, SUITE 200  
GEORGETOWN, TEXAS 78628

PHONE (512) 930-1317

FAX (866) 929-1641

CHIEF CLERKS OFFICE

WWW.TXADMINLAW.COM

Email: krussell@txadminlaw.com ✓

March 30, 2011

**Via Facsimile and Hand-Delivery**

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

MWD  
76584

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MAR 31 2011

WATER QUALITY DIVISION  
TCEQ

Re: *Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

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2. *Applicant information: Application of Williamson County Municipal Utility District (MUD) No. 19 to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas.*

MWD

3. The location and distance of your property/activities relative to the proposed facility:

The proposed facility is located approximately 1.5 miles from the City's corporate limits and on property adjacent to the City's extraterritorial jurisdiction.

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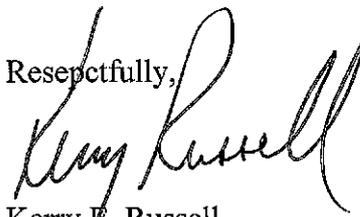
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The City understands that WCMUD 19 has never operated a wastewater treatment facility. The City is concerned that the operations of the facility will not adequately protect the environment.

5. The City requests a public meeting and a contested case hearing on the application.

If I may be of further assistance, please contact me at the number above.

Respectfully,

A handwritten signature in black ink, appearing to read "Kerry Russell". The signature is written in a cursive style with a large, looping initial "K".

Kerry E. Russell

cc: State Senator Steve Ogden  
State Representative Charles Schwertner  
Williamson County Commissioner Cynthia Long  
Mayor Michelle Murphy  
Liberty Hill City Council



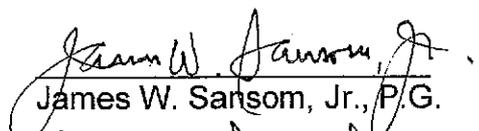
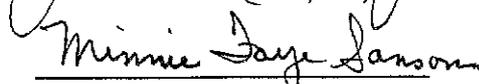
3. TCEQ rules require certain sampling parameters based on the proposed wastewater treatment facility's distance upstream from the Edward's Recharge Zone. Flow from Lake Georgetown flows over the Edwards Recharge Zone downstream from Lake Georgetown. What thought has been given to additional parameters being required in that the effluent from this wastewater treatment facility will be essentially flowing into a relatively small lake that supplies drinking water to citizens in Williamson County who buy their treated water from the City of Georgetown, City of Round Rock, and Brushy Creed MUD, and Chisholm Trail Special Utility District?

4. There is a major geologic fault that Soves Branch follows for almost its entire length from where the effluent is planned to be discharged to the North San Gabriel River. This fault is well documented by maps of our State Geological Survey, the Bureau of Economic Geology, and was discussed by me during the Public Meeting held in May, 2012. This fault and associated fractures can provide an avenue for water in the creek to flow into the ground water. At the Public Meeting I was told by TCEQ staff members that no geologist reviewed this permit. I suggested that they should check with TCEQ geologists about my concerns. There is no mention of my concerns about this fault in the correspondence that I received from TCEQ dated July 25, 2013, addressing comments from the public. There were several comments made by different individuals at the Public Meeting concerned about the effects the effluent flowing along Soves Branch might have on the ground water.

5. I also discussed the potential problem of Pharmaceuticals that will be released by individuals and go to the wastewater treatment plant. TCEQ review staff confirmed that the treatment plant will not have the capability to remove the Pharmaceuticals from the water thus they will flow unabated into Lake Georgetown, drinking water supply for many Williamson County residents. This was addressed in the review staff's comments that I consider unacceptable since all of the literature and experts that I have been in contact with indicate a serious concern about the potential for this problem in the people who drink this water. Research and studies are being done worldwide to find a solution to this potential problem. Ignoring this problem is not the answer.

I ask that in making your decision on this contest hearing that you follow the statement on your letterhead, "Protecting Texas by Reducing and Preventing Pollution".

Sincerely,

  
James W. Sansom, Jr., P.G.  
  
Minnie Faye Sansom

Jim & Faye Sansom  
3495 County Road 258  
Liberty Hill, TX 78642

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2013 AUG 13 AM 10:22

CHIEF CLERKS OFFICE

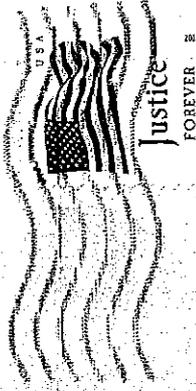
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AUG 13 2013

TCEQ MAIL CENTER  
JR

Bridget C. Bohac, Chief Clerk  
MC 105  
Texas Commission of Environmental Quality  
P. O. Box 13087  
Austin, Texas 78711-3087

78711308767

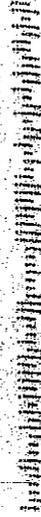


12 AUG 2013 PM 2:12  
AUSTIN TX 78711

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TCEQ MAIL CENTER  
JR



3495 County Road 258  
Liberty Hill, Texas 78642  
512 515-0916  
October 6, 2012

*MWD  
76586*

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

**REVIEWED** H  
OCT 17 2012  
By *GP*

Dear Sirs:

This correspondence is in reference to the Notice of Application and Preliminary Decision for TPDES Permit for Municipal Wastewater New for Proposed Permit No. WQ0015000001 submitted by Williamson County Municipal Utility District No. 19. We received this information on October 4, 2012.

In March, 2011 (one and one-half years ago) we received a letter from TCEQ notifying us that Williamson County Municipal Utility District No. 19 had submitted an application for a TPDES permit that proposes to utilize Sowes Branch to carry effluent discharged from a proposed wastewater treatment plant located upstream from our property to its confluence with the North San Gabriel River. My wife and I live on and own approximately 1100 feet of Sowes Branch downstream from the proposed domestic wastewater treatment facility that is located approximately 6200 feet upstream. Our land is between its discharge point into Sowes Branch and its confluence with the North San Gabriel River.

We wrote TCEQ a letter dated April 17, 2011 requesting a contested case hearing for this permit application to provide testimony at the hearing of some of our concerns. A copy of our original letter is included. We are still of the same opinion and continue to ask for a hearing.

Sincerely,

*James W. Sansom, Jr.*  
James W. Sansom, Jr., P.G.

*Minnie Faye Sansom*  
Minnie Faye Sansom

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2012 OCT 15 PM 2:55

CHIEF CLERKS OFFICE

*MWD*

3495 County Road 258  
Liberty Hill, Texas 78642  
512 515-0916  
April 17, 2011

CHIEF CLERKS OFFICE

2012 OCT 15 PM 2:56

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

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

Dear Sirs:

This correspondence is in reference to the Application for Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0015000001 (EPA I.D. No. TX0132969) submitted by Williamson County Municipal Utility District No. 19.

My wife and I live on and own approximately 1100 feet of Sowes Branch downstream from the proposed domestic wastewater treatment facility that is located approximately 6200 feet upstream. Our land is between its discharge point into Sowes Branch and Sowes Branch confluence with the North San Gabriel River.

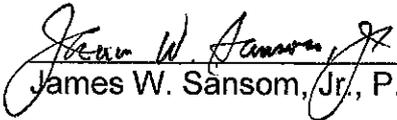
We request a contested case hearing for this permit application. We wish to provide testimony at the hearing that will include our concerns, some of which are as follows:

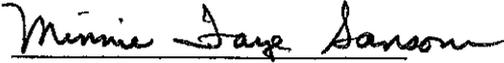
1. We ask if there is some alternative to discharging the effluent from the proposed wastewater treatment facility into Sowes Branch? In that there is approximately 1200 feet from our land to its confluence with the North San Gabriel River, this adds up to  $6200 + 1100 + 1200 = 8500$  feet from the treatment plant to the North San Gabriel River. We have owned our 1100 feet of Sowes Branch for 39 years and are familiar with its flow. It is an ephemeral stream, meaning it only flows at direct response to rainfall. In normal rain fall years it flows some in the spring and some in the fall, during the months of highest precipitation on average. Therefore, there will be very little if any dilution of the effluent from the up to 1,400,000 gallons of daily discharge before it flows into the North San Gabriel a short distance upstream of the normal pool level of Lake Georgetown. As we all know, Lake Georgetown provides drinking water to the City of Georgetown, City of Round Rock, and Chisholm Trail Special Utility District.

2. What is planned as to establishing baseline water quality data of Sowes Branch prior to proposed discharge of effluent from the wastewater treatment into it? This is necessary to establish the quality of the natural flow in Sowes Branch and the North San Gabriel River prior to the proposed inflow from the wastewater treatment facility for comparison. This could only be done on Sowes Branch when it is flowing, as well as, both upstream and downstream of its confluence with the North San Gabriel for a time that would reflect all seasons.

3. TCEQ rules require certain sampling parameters based on the proposed wastewater treatment facility's distance upstream from the Edward's Recharge Zone. Flow from Lake Georgetown flows over the Edwards Recharge Zone downstream from Lake Georgetown. What thought has been given to additional parameters being required in that the effluent from this wastewater treatment facility will be essentially flowing into a relatively small lake that supplies drinking water to citizens in Williamson County who buy their treated water from the City of Georgetown, City of Round Rock, and Chisholm Trail Special Utility District?

Sincerely,

  
James W. Sansom, Jr., P.G.

  
Minnie Faye Sansom

James W. Sansom, Jr., P.G.  
Consulting Geologist  
3495 County Road 258  
Liberty Hill, TX 78642



AUSTIN TX 787  
RFD GRANDE DISTRICT  
12 OCT 2012 11:41

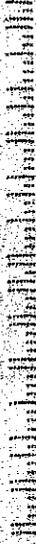
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OCT 15 2012

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2012 OCT 15 PM 2:55  
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QUALITY

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



78711308787

OPA

H APR 25 2011

3495 County Road 258  
Liberty Hill, Texas 78642  
512 515-0916  
April 17, 2011

By ll

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

MWD  
76586

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
2011 APR 22 AM 10:06  
CHIEF CLERKS OFFICE

Dear Sirs:

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My wife and I live on and own approximately 1100 feet of Sowes Branch downstream from the proposed domestic wastewater treatment facility that is located approximately 6200 feet upstream. Our land is between its discharge point into Sowes Branch and Sowes Branch confluence with the North San Gabriel River.

We request a contested case hearing for this permit application. We wish to provide testimony at the hearing that will include our concerns, some of which are as follows:

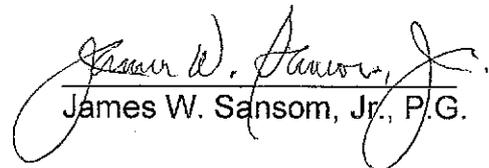
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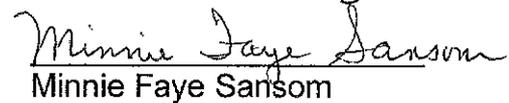
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MWD

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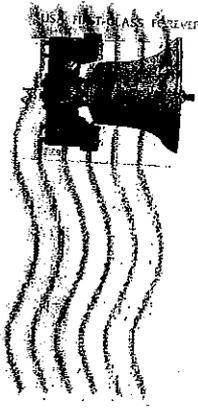
Sincerely,

  
James W. Sansom, Jr., P.G.

  
Minnie Faye Sansom

James W. Sansom, Jr., P.G.  
3495 County Road 258  
Liberty Hill, TX 78642

AUSTIN TX 787  
APR 22 2011



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2011 APR 22 AM 10: 57  
CHIEF CLERKS OFFICE

RECEIVED

APR 22 2011  
TCEQ MAIL CENTER  
AR

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

78711-3087



TCEQ Public Meeting Form  
May 14, 2013

1

Williamson County MUD No. 19  
TPDES Permit No. WQ0015000001

RECEIVED

MAY 14 2013

AT PUBLIC MEETING

PLEASE PRINT

Name: JAMES W. SANSON, JR

Mailing Address: 3495 County Road 258

Physical Address (if different): \_\_\_\_\_

City/State: Liberty Hill, Texas Zip: 78642

\*\*This information is subject to public disclosure under the Texas Public Information Act\*\*

Email: jwsanson@gmail.com

Phone Number: 512 515-0916

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

If yes, which one? \_\_\_\_\_

Please add me to the mailing list.

I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.

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 form to the person at the information table. Thank you.

MS

JAMES W. SAXSON, JR.

Public Meeting May 14<sup>th</sup>, 2013 at 7 PM for TPDES Permit for Municipal Wastewater Permit No. WQ001500001 Application by Williamson County Municipal Utility District No.19.

RECEIVED

MAY 14 2013

Questions:

TCEQ staff (Eng., Biologist, Analyst); Applicant -

AT PUBLIC MEETING

1. Who will be answering our questions? What is their expertise?
2. Daily average flow will be 1,400,000 gallons per day. What is the range of discharge per day? Minimum? Maximum? *2,700,000*
3. What kind of stream is the Sowes Branch from the proposed wastewater treatment plant to its confluence with the North San Gabriel River? Perennial? Ephemeral? *1.6 miles*
4. Will there be any dilution of the effluent that is discharged from the wastewater treatment plant before it reaches the North San Gabriel River?
5. Are you familiar with PPCPs (Pharmaceuticals and Personal Care Products)? Are you aware that these have been found in many water bodies throughout the world? Are you aware that they come from: prescriptions, over the counter drugs, (antibiotics, vitamins, sexual enhancement drugs, diuretics, etc.) Personal care products include cosmetics, fragrances, menstrual care products, lotions, shampoos, soaps, toothpastes, and sunscreen? To mention just a few. These products enter the environment when passed through or washed off the body.
6. Will the planned wastewater treatment plant have the ability to remove the PPCPs?
7. Are you aware that Sowes Branch follows a major fault of the Balcones Fault Zone like many streams do? Therefore, is it possible for the effluent from the wastewater treatment plant to move down the faults and joints associated with this fault and migrate into the groundwater?

Summary: The effluent from the wastewater treatment plant will travel 8500 feet (1.6 miles) to its confluence with the North San Gabriel River just upstream with the tails waters of Lake Georgetown the drinking water supply for the City of Georgetown, City of

*Handwritten signature*

Round Rock, Shady Hollow, and Chisholm Trail Special Utility District without any dilution.

Up to 2,700,000 gallons per day of effluent will be discharged into Lake Georgetown.

There are no provisions for treating the wastewater and removing the PPCPs that will be introduced by the homes planned to be served by this treatment plant.

There is a potential via a fault that Sowes Branch follows for the effluent to migrate to the ground water in the subsurface .

I am of the opinion that if the Citizens of Georgetown, Round Rock, Shady Hollow, and Chisholm Trail Special Utility District who get there drinking water from Lake Georgetown would prefer the effluent to be discharged somewhere else than in their drinking water supply.

**RECEIVED**  
MAY 14 2013  
**AT PUBLIC MEETING**

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, August 22, 2013 12:57 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015000001

H

**From:** [steve@scrrlaw.com](mailto:steve@scrrlaw.com) [<mailto:steve@scrrlaw.com>]  
**Sent:** Wednesday, August 21, 2013 4:46 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015000001

*MWD  
76586*

**REGULATED ENTITY NAME** WILLIAMSON COUNTY MUD 19 - SANTA RITA UPPER MIDDLEBROOK WWTP

**RN NUMBER:** RN106076862

**PERMIT NUMBER:** WQ0015000001

**DOCKET NUMBER:**

**COUNTY:** WILLIAMSON

**PRINCIPAL NAME:** WILLIAMSON COUNTY MUD 19

**CN NUMBER:** CN603045691

**FROM**

**NAME:** Steve Sheets

**E-MAIL:** [steve@scrrlaw.com](mailto:steve@scrrlaw.com)

**COMPANY:** Sheets & Crossfield, P.C.

**ADDRESS:** 309 E MAIN ST  
ROUND ROCK TX 78664-5246

**PHONE:** 5122558877

**FAX:** 5122558986

**COMMENTS:** I, Steve Sheets, am the City Attorney for the City of Round Rock, Texas ("City"), and these comments are on behalf of my client. The discharge point of the proposed facility is located just a few miles upstream of Lake Georgetown, which is a major source of water for the City. The proposed plant is located approximately 3 miles from a wastewater treatment plant which is part of the regional wastewater plan and is

*MWD*

currently owned by the City of Liberty Hill and operated by the Brazos River Authority (“LHWWTP”). The City understands that a transmission main from the Applicant's property already exists and extends to the LHWWTP. Thus, there is no need for the proposed facility. The plant is also located approximately 4 miles from Georgetown’s Cimarron Hills WWTP, which is available to provide service to the Applicant's property. The proposed facility violates the agency’s policy of regionalization or area-wide systems articulated in Texas Water Code § 26.081, as other providers in the area have the ability to serve the Applicant’s property. The City's position is that: (1) because of available alternatives this treatment facility is not necessary, (2) it does not conform to the regional plan, (3) the owner has no experience with the operations of such a facility with stringent limits imposed upon the effluent necessary to protect the Edwards Aquifer and Lake Georgetown, and (4) the operation of such facility could result in unnecessary impact to water quality of the primary drinking water supply of the City. It is not in the public interest for the agency to issue a new discharge authorization when regionalized wastewater services are available. In addition, the City is concerned that the effluent from the discharge point will eventually make it to Lake Georgetown. Not only is Lake Georgetown the primary source of the City's drinking water, it is also a key recreational resource for the public at large. The City is concerned that the discharge parameters are not stringent enough to protect the public's health, safety and welfare. For all of the foregoing reasons the City requests a contested case hearing on the application.

# Sheets & Crossfield, P.C.

ATTORNEYS AT LAW

309 East Main Street • Round Rock, TX 78664-5246

Phone 512-255-8877 • fax 512-255-8986

*mud  
76586*

April 26, 2011

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APR 27 2011

ENVIRONMENTAL QUALITY

H  
PM

OPA

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78711-3087

BY

*AK*

CHIEF OFFICES OFFICE

2012 FEB -3 PM 4:40

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Re: *Application of Williamson County Municipal Utility District No. 19 ("MUD No. 19") to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas*

To: Texas Commission on Environmental Quality

The undersigned represents the City of Round Rock, Texas ("City") regarding the above-referenced TPDES permit application ("Application"). Please accept this letter as the City's notice of its opposition to the Application submitted by MUD No. 19, and its request for a public meeting and a contested case hearing. The City provides the following information:

1. *Your name, address, phone number:*

The City may be notified of any developments in this case by providing notice to:

Stephan L. Sheets  
Sheets & Crossfield, P.C.  
309 E. Main St.  
Round Rock, Texas 78664  
tele (512) 255-8877  
fax (512) 255-8986  
email [steve@scrrlaw.com](mailto:steve@scrrlaw.com)

2. *Applicant information:* Application of Williamson County Municipal Utility District No. 19 ("MUD No. 19") to Obtain a Water Quality Permit, Proposed Permit No. WQ0015000001 in Williamson County, Texas

3. *The location and distance of your property/activities relative to the proposed facility:* The proposed facility is located approximately 7 miles upstream of Lake Georgetown, which is the City's primary source of drinking water.

*mw*

4. *Specific description of how you would be adversely affected by the facility in a way not common to the general public.*

The City draws an average of approximately 21 mgd gallons of water per day from Lake Georgetown, which is its primary source of drinking water for approximately 140,000 people in the City's service area. The proposed facility is located approximately 7 miles upstream of the City's intake structures.

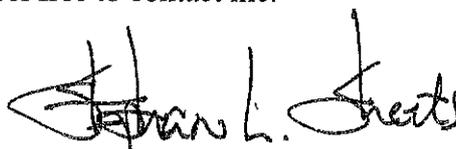
The City understands that there are at least two regional alternatives to the proposed facility. Utilizing one of these regional alternatives would further the TCEQ's policy of regionalization or area-wide systems as articulated in Texas Water Code §26.081. There is no need for the proposed facility.

The City is concerned with the operation of an unnecessary wastewater treatment facility that does not conform to a regional plan, whose owner has no experience with the operations of such a facility with stringent limits imposed upon the effluent necessary to protect the Edwards Aquifer and Lake Georgetown. The operation of such a wastewater treatment facility has the potential of introducing pollutants into Lake Georgetown, which would have an adverse impact upon the drinking water of 140,000 people in the City's service area.

Lake Georgetown is a key recreational resource for the residents of the City and the public at large. The City is concerned that the discharge of treated effluent into Lake Georgetown may affect aquatic life and cause algae blooms to occur in the lake.

5. The City requests a public meeting and a contested case hearing on the application. The City joins the City of Georgetown in requesting a public meeting on this matter be held in Sun City in Georgetown.

If you have any questions, please feel free to contact me.

A handwritten signature in black ink that reads "Stephan L. Sheets". The signature is written in a cursive style with a large, stylized initial 'S'.

Stephan L. Sheets  
Round Rock City Attorney

CC: Steve Norwood, Round Rock City Manager  
Michael Thane, Round Rock Director of Utilities  
Arturo D. Rodriguez, Jr., Attorney for the City of Georgetown  
Mike Willatt, Attorney for Williamson County MUD #19

**Sheets & Crossfield, P.C.**

ATTORNEYS AT LAW

309 East Main Street • Round Rock, TX 78664-5216

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

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2012 FEB -3 PM 4:42

APR 27 2011

CHIEF CLERKS OFFICE

TCEO MAIL CENTER  
AR



Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, Texas 78714-3087

787133087 8012

