

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Neal Sutton

1000 Polo Club Dr.

Austin, Texas 78737

(512) 304-0966 home

(281) 844-5529 cell

(512) 288-4828 fax

✓ nssutton3@gmail.com

2014 APR 29 AM 9:56

CHIEF CLERKS OFFICE

LWD  
9/16/10

REVIEWED pm

APR 29 2014

By [Signature]

April 27, 2014

Office of the Chief Clerk  
MC105, TCEQ  
P. O. Box 13087  
Austin, Texas 78711-3087

Re: Proposed Permit No. WQ0005111000

Dear TCEQ:

I am writing concerning the above proposed TPDES permit filed by Tenaska Roan's Prairie Partners, LLC. We own 25 acres located at 7537 County Road 242 in Grimes County, Texas, through which Flagtail Creek passes. The western entry point of Flagtail Creek to our property is less than one mile from the proposed likely discharge point for treated wastewater and stormwater runoff from the proposed generation station. We do have some concerns about the effect on our property of the proposed permit.

Flagtail Creek, at least the portion on our property, meanders and curves quite a bit. It is filled in many places with natural debris and fallen trees. The creek runs very close to and below a pond on the property. We are very concerned that the level of proposed discharge will cause potentially severe flooding and erosion of the creek bank. Such erosion will damage our property generally and potentially undercut and adversely affect our pond.

There is nothing in the application that indicates the condition to which the wastewater will be treated and what it will contain. Unlike Tenaska's wastewater discharge from its current Roan's Prairie plant, which goes under highway 30 to a large holding pond, the proposed waste and storm water will be immediately discharged into a public waterway.

If this proposed permit is issued for up to 105,000 gallons per day, what is the procedure and the opportunity for public comment should Tenaska decide to apply to increase the amount of discharge? Would the granting of the proposed application allow Tenaska to increase the discharge to some level set by statute or regulation without going through a permitting and public comment period?

MW

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Office of the Chief Clerk  
April 27, 2014  
Page 2

2014 APR 29 AM 9: 56

CHIEF CLERKS OFFICE

I spoke with a Tenaska representative who told me that no decision about building the proposed generation facility had been made. She also told me that the proposed facility would be used only in times of peak power demand. She estimated that the plant would be in operation no more than one-third of the time in any given year; thus a proposed discharge of up to 105,000 gallons would only occur in one-third of the days in any given year. I find it hard to believe that Tenaska would make the huge investment in a new generation station, equal in size to the existing facility (less the steam co-generation operation), solely to use it only occasionally in peak demand periods. That may be the current intent. But given the growth in areas served by Tenaska, or to be served, Tenaska certainly would operate the proposed plant at whatever capacity was needed, including full capacity, to meet that need. In such a case, the effect on downstream landowners from wastewater and stormwater discharge would be significantly and adversely affected.

Thank you for the opportunity to make these comments. I believe it would be in the best interests of affected landowners if a public meeting was held on this application.

Very truly yours,



Neal Sutton