



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 APR -9 PM 2: 52

CHIEF CLERKS OFFICE

March 28, 2014

Office of the Chief Clerk, MC 105  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087  
Fax: (512) 239-3311

*VIA U.S. MAIL*

**RE: *Comments on Proposed Permit No. WQ0015201001. Applicant JPHD, Inc., 17024 Hamilton Pool Road, Austin, Texas 78738.***

Dear Chief Clerk:

Enclosed please find 3 copies of the comments Save Our Springs Alliance Inc., (SOS) filed, electronically and via fax on March 27, 2014, in response to the notice published on the filing of an administratively complete application for the above referenced Texas land application permit.

If you have any questions or comments please feel free to contact me by phone at 512. 477.2320 ext. 305 or by email at [adam@sosalliance.org](mailto:adam@sosalliance.org).

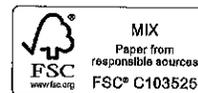
Sincerely,

A handwritten signature in black ink that reads "Adam Abrams".

Adam Abrams  
Staff Attorney

(512) 477-2320 voice  
(512) 477-6410 fax

**Save Our Springs Alliance**  
P.O. Box 684881 • Austin, Texas 78768  
905 West Oltorf Street, Suite A • Austin, Texas 78704



<http://www.sosalliance.org>  
email: [sosinfo@sosalliance.org](mailto:sosinfo@sosalliance.org)

# S.O.S.



**SAVE OUR SPRINGS  
ALLIANCE**

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CHIEF CLERKS OFFICE

REVIEWED

APR 10 2014

By hp

MWD  
90957

March 27, 2014

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Texas Commission on Environmental Quality  
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VIA ELECTRONIC FILING AND FAX, TO FOLLOW BY U.S. MAIL

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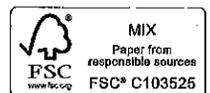
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CM



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email: [sosinfo@sosalliance.org](mailto:sosinfo@sosalliance.org)

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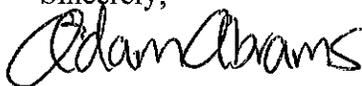
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12. Proposed irrigation areas have not been demonstrated to be suitable in terms of soils, geology, slope, and proximity to adjacent streams and proposed development.

Thank you for your consideration. If you have any questions about these comments, please contact Adam Abrams, Staff Attorney, Save Our Springs Alliance at 905 West Oltorf, Suite A, Austin, Texas 78704 or by phone at 512. 477.2320 ext. 305.

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Adam Abrams  
Staff Attorney



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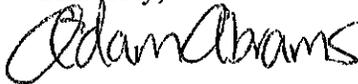
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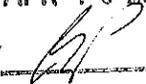
TEXAS  
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2014 APR -9 AM 10:33

CHIEF CLERKS OFFICE

REVIEWED

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By 

March 27, 2014

Office of the Chief Clerk, MC 105  
Texas Commission on Environmental Quality  
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Austin, Texas 78711-3087  
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MWD  
75906  
0957

VIA ELECTRONIC FILING AND FAX, TO FOLLOW BY U.S. MAIL

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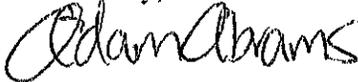
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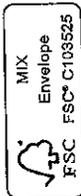
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SAVE OUR SPRINGS  
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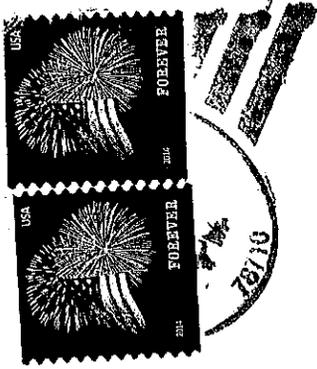
P.O. Box 684881 - Austin, TX 78768

RECEIVED

APR 09 2014

TCEQ MAIL CENTER

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



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TEXAS  
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QUALITY

2014 MAR 27 PM 4: 38

CHIEF CLERKS OFFICE

March 27, 2014

REVIEWED

MAR 28 2014

By [Signature]

Office of the Chief Clerk, MC 105  
Texas Commission on Environmental Quality  
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*MWD*  
*90957*

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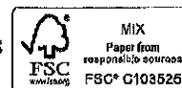
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*MWD*

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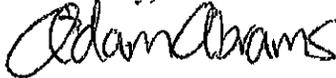
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Adam Abrams  
Staff Attorney

# FAX COVER SHEET

TO	
COMPANY	
FAX NUMBER	15122393311
FROM	Pat Brodnax
DATE	2014-03-27 21:34:17 GMT
RE	Public comment on Permit Number WQ0015201001

## COVER MESSAGE

To Whom It May Concern,

Please see attached comments for permit number WQ0015201001. SOS just e-filed these comments as well. Thanks in advance for your help.

Sincerely,

Adam Abrams  
 Save Our Springs Alliance  
 905 W. Oltorf  
 Suite A  
 Austin, Texas 78704  
 Ph. 512.477.2320  
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TEXAS  
 COMMISSION  
 ON ENVIRONMENTAL  
 QUALITY  
 2014 MAR 27 PM 4:38  
 CHIEF OF ENVIRONMENTAL QUALITY OFFICE

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, March 27, 2014 4:57 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001  
**Attachments:** Save Our Springs Comments on WQ0015201001 (JPHD)1.pdf

**From:** adam@sosalliance.org [mailto:adam@sosalliance.org]  
**Sent:** Thursday, March 27, 2014 4:30 PM  
**To:** donotReply@tceq.texas.gov  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD  
90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** MR Adam Abrams

**E-MAIL:** adam@sosalliance.org

**COMPANY:** Save Our Springs Alliance

**ADDRESS:** 905 W OLTORF ST Suite A  
AUSTIN TX 78704-5395

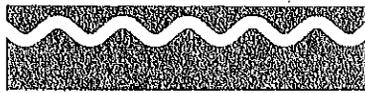
**PHONE:** 5124772320

**FAX:**

**COMMENTS:** Save Our Springs has attached comments via pdf.

*MWD*

# S.O.S.



## SAVE OUR SPRINGS ALLIANCE

March 27, 2014

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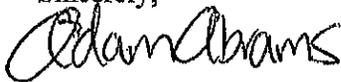
10. The manicuring and mowing of the proposed irrigation areas will adversely affect the proposed vegetation's already limited ability to uptake nitrogen.

11. Treatment levels within the treatment plant should be much more protective, consistent with currently available technology.

12. Proposed irrigation areas have not been demonstrated to be suitable in terms of soils, geology, slope, and proximity to adjacent streams and proposed development.

Thank you for your consideration. If you have any questions about these comments, please contact Adam Abrams, Staff Attorney, Save Our Springs Alliance at 905 West Oltorf, Suite A, Austin, Texas 78704 or by phone at 512. 477.2320 ext. 305.

Sincerely,

A handwritten signature in black ink that reads "Adam Abrams". The signature is written in a cursive, flowing style.

Adam Abrams  
Staff Attorney

TCEQ Public Meeting Form  
December 15, 2014

2

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: Ariel Axelrod

Mailing Address: 17008 RUSH PRA CDE

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

City/State: AUSTIN Zip: 78738

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

Email: ariela.alexrodus ✓

Phone Number: 512-571-9054

- 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*

TCEQ Public Meeting Form  
December 15, 2014

5

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: Kelly Davis

Mailing Address: 905 W. Oltorf St., Ste. A

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

City/State: Austin, TX Zip: 78704

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

Email: Kelly@sasalliance.org ✓

Phone Number: 512-477-2320 ext. 306

• Are you here today representing a municipality, legislator, agency, or group?  Yes  No  
If yes, which one? Save Our Springs Alliance

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.

MW

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 19, 2014 3:36 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001  
**Attachments:** TCEQ Letter1.docx

PM

**From:** [sfengland@mac.com](mailto:sfengland@mac.com) [<mailto:sfengland@mac.com>]  
**Sent:** Wednesday, March 19, 2014 2:30 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD  
90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** Stephen England

**E-MAIL:** [sfengland@mac.com](mailto:sfengland@mac.com)

**COMPANY:**

**ADDRESS:** 17501 WILD RYE DR  
AUSTIN TX 78738-4052

**PHONE:** 5123345943

**FAX:** 5124020302

**COMMENTS:** Please see attached letter

*MWD*

Stephen & Marcia England  
17501 Wildrye Drive  
Austin, TX, 78738  
Tel: +1 (512) 334 5943  
Fax: +1 (512) 402 0302  
[sfengland@mac.com](mailto:sfengland@mac.com)  
[mmengland@mac.com](mailto:mmengland@mac.com)

January 13, 2006

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

**Re: Proposed Permit No. WQ0015201001 (JPHD Inc.)**

I am a bordering neighbor of the planned development. I received your notice of the receipt of application. I will be directly affected by the proposed wastewater disposal system.

First, I am opposed to this application for the following reasons:

- The soil in the proposed development is shallow and of poor quality. It will not be able to absorb the proposed volume of irrigated effluent on a dependable basis. Effluent is bound to seep into Little Barton Creek from time to time, impacting water quality
- Irrigating a massive amount of treated wastewater (450,000 gallons per day) on just 105 acres of land will overwhelm the absorptive capacity of the soil and vegetation, especially during sustained rainy conditions. This will inevitably impact water quality in Little Barton Creek.
- The plant's pollutant removal parameters are not adequate to preclude pollution of Little Barton Creek.
- This large-scale wastewater treatment plant will create odors and noise pollution that will affect nearby homeowners

Second, I request that there be a public meeting concerning this application.

Third, please put me on the mailing list for all information related to this project.

Thank you very much. Sincerely,

**Stephen England**

TCEQ Public Meeting Form  
December 15, 2014

6

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: Mara Ewald

Mailing Address: 20314 Hamilton Pool Rd

Physical Address (if different): "

City/State: Dripping Springs Zip: 78620

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

Email: marasri@texadata.net ✓

Phone Number: 512-477-9243

• 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.

*Mara*

TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: JEFF GARDNER

Mailing Address: 16721 Cory Cactus Dr. Austin 78738

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

City/State: Austin Zip: 78738

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

Email: PORSCHEPARKER@MAC.COM ✓

Phone Number: 512-487-5352

• 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.

*Mc*

Formal Written Comment: JEFF GARDNER, 16121 CORY CACTUS DR  
AUSTIN TX 78738

ONE OF THE MAJOR Q & A THEMES OF TONIGHTS MEETING WAS THE IDEA OF PREVIOUS PRECEDENT IN MAJOR DEVELOPMENTS ON HAMILTON POOL ROAD. ONE OF THOSE DEVELOPMENTS, THAT WAS MENTIONED REPEATEDLY, WAS ROCKY CREEK. TCEQ & THE ENGINEER BOTH SAID THAT DIFFERENCES (DRIP VS SPRAY, ETC) MADE THAT COMPARISON DIFFICULT, THAT SEEMS AN INCOMPLETE ANSWER. I WOULD LIKE TO PROPOSE THAT THE TCEQ PROACTIVELY STUDY THE ENTIRE ROCKY CREEK DEVELOPMENT FOR BEST PRACTICES IN THE AREA. I'M NOT PROPOSING ALTERING THE TECHNOLOGY, I AM PROPOSING TO MIMIC THE WAY THE DEVELOPER & RELEVANT AGENCIES WORKED TOGETHER & WITH THE PUBLIC TO ACHIEVE A SOLUTION THAT OBVIOUSLY THE PUBLIC ACCEPTS & ENDORSES.

ROCKY CREEK ALSO ACHIEVED ADMIRABLE RESULTS IN MANY AREAS OUTSIDE OF TCEQ'S RESPONSIBILITY: DARK SKY RESTRICTIONS, LOT DENSITY, IMPERVIOUS GROUND COVER RESTRICTIONS, DROUGHT TOLERANT VEGETATION, OPEN SPACE REQUIREMENTS, ETC. IT DOES NOT SEEM UNREASONABLE TO ME FOR ALL PARTIES TO LEARN FROM & ADHERE TO THE CONSCIENTIOUS AND THOUGHTFUL DEVELOPMENT THAT HAS ALREADY OCCURRED. IT HAS HELPED KEEP THE HAMILTON POOL ROAD CORRIDOR BEAUTIFUL.

RECEIVED

DEC 15 2014

AT PUBLIC MEETING

*mw*

# 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.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, March 28, 2014 8:12 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001

PM

**From:** [pgolde@techpeopleinc.com](mailto:pgolde@techpeopleinc.com) [<mailto:pgolde@techpeopleinc.com>]  
**Sent:** Thursday, March 27, 2014 6:17 PM  
**To:** [donotReply@tceq.texas.gov](mailto:donotReply@tceq.texas.gov)  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD  
90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** Peter W Golde

**E-MAIL:** [pgolde@techpeopleinc.com](mailto:pgolde@techpeopleinc.com)

**COMPANY:**

**ADDRESS:** 8301 BELLANCIA DR  
AUSTIN TX 78738-7659

**PHONE:** 5123276371

**FAX:**

**COMMENTS:** March 27, 2014 Office of the Chief Clerk MC 105, TCEQ PO Box 13087 Austin, TX 78711-3087 Proposed Permit No. WQ0015201001 (JPHC, Inc.) Through the Belvedere HOA, we received TCEQ Notice of Application (Proposed Permit No. WQ0015201001) for the planned development by Masonwood Development and we are responding to this application. We have recently built a home in the Belvedere subdivision that would be negatively affected by this massive proposed subdivision. This development plans to

*CGW*

irrigate a massive amount of treated wastewater on just 105 acres of land. This process will overwhelm the absorptive capacity of the shallow soil here. Little Barton Creek runs through many areas of this proposed subdivision and effluent will inevitably seep into the Creek, negatively impact the quality of the water. We are also concerned that the large-scale wastewater treatment plant that is proposed will create odors and noise pollution that will affect us and other nearby homeowners. We request that there be a public meeting concerning this application. Please put us on the mailing list for all information related to this project (email addresses: [bgolde3502@gmail.com](mailto:bgolde3502@gmail.com) and [pgolde@techpeopleinc.com](mailto:pgolde@techpeopleinc.com)) or the mailing address noted below. Thank you for your consideration. Elizabeth and Peter Golde 8301 Bellancia Drive Austin, TX 78738

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 26, 2014 9:50 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001  
**Attachments:** TCEQ comment1.pdf

PM

**From:** [mollygurasich@yahoo.com](mailto:mollygurasich@yahoo.com) [<mailto:mollygurasich@yahoo.com>]  
**Sent:** Tuesday, March 25, 2014 8:27 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD*  
*90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** MRS Molly Gurasich

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

**COMPANY:**

**ADDRESS:** 16608 DESTINY CV  
AUSTIN TX 78738-7400

**PHONE:** 5124029856

**FAX:**

**COMMENTS:** comment letter attached

*MWD*

March 24, 2014

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

**Re: Proposed TLAP permit number WQ0015201001 (JPHD, Inc.)**

We are homeowners directly downstream of the proposed wastewater treatment plant. Little Barton Creek runs through our property. We are concerned that we will be negatively affected by the proposed wastewater disposal system.

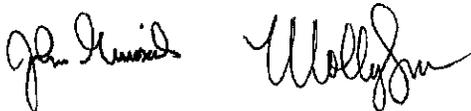
Specifically, we have serious questions regarding the possibility of odor, noise, and most importantly, water pollution from what we assume will be a large treatment plant. It seems inevitable that this treatment plant will put the water and groundwater around us at risk. We have a well for household drinking water and are very apprehensive about the potential for contamination and health risks. We have two young children who will be drinking this water for the majority of their developing years.

For a wastewater treatment plant to support a development project of the proposed size, it is imperative that the plant itself be of the highest standard to protect neighbors from adverse and preventable consequences. Because of the large scale of this project, we will already be negatively impacted by changes in traffic, view, and "country" living. We hope we don't also have to worry about noxious fumes, environmental contamination, and health hazards from the plant.

While we respect a landowner's right to develop their property as they choose, we also expect responsible planning and for the project to have minimal impact on neighbors. We request that there be a public meeting concerning this permit application.

Thank you for your attention to this matter.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is 'John Gurasich' and the signature on the right is 'Molly Gurasich'. Both are written in a cursive, flowing style.

John & Molly Gurasich  
16608 Destiny Cove  
Austin, TX 78738

512-402-9856  
mollygurasich@yahoo.com

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 26, 2014 9:51 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** CORRECTION FW: Public comment on Permit Number WQ0015201001

PM

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 26, 2014 9:50 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001

*MWD  
90957*

**From:** [kh@dkhanson.com](mailto:kh@dkhanson.com) [mailto:[kh@dkhanson.com](mailto:kh@dkhanson.com)]  
**Sent:** Monday, March 24, 2014 8:45 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** MRS Kathleen Malick Hanson

**E-MAIL:** [kh@dkhanson.com](mailto:kh@dkhanson.com)

**COMPANY:**

**ADDRESS:** 16400 HAMILTON POOL RD  
AUSTIN TX 78738-7300

**PHONE:** 5122634121

**FAX:**

*CM*

**COMMENTS:** March 20, 2014 Office of the Chief Clerk MC 105, TCEQ PO Box 13087 Austin, TX 78711-3087 Re: Proposed Permit No. WQ0015201001 (JPHC, Inc) We are responding to the TCEQ notice of application (shown above) for the Hatchett Tract. We are directly affected by the proposed wastewater treatment plant as our western fenceline of over 1000 feet is shared with the Hatchett tract. We have held a wildlife exemption on our 28 acres for 18 years, during which time we have aggressively attempted to bring back native grasses for more effective replenishment of the underlying Barton Springs segment of the Edwards Aquifer. Furthermore, almost half of the Hatchett property along our fenceline is low-lying with numerous large oaks and fifty Big Muhly grass clumps retaining and releasing run off into the aquifer. (The plan shows that most of this area will be clear cut up to the fence to accommodate 60' x 120' lots) Since the soil in the proposed development is shallow and of poor quality, we are concerned that it will not be able to absorb the volume of irrigated effluent dependably. Such a massive amount of treated wastewater on just 105 acres of land will certainly overwhelm the absorptive capacity of soil and vegetation, raising the possibility of effluent reaching and polluting the wetlands we have observed along our fenceline. We ask that serious consideration be given by the TCEQ to reducing the amount of effluent (and hence the number of proposed LUEs) allowed with this massive development. We also would request that there be a public meeting concerning this application and would like to be put on the mailing list:([dick@dkhanson.com](mailto:dick@dkhanson.com) or 16400 Hamilton Pool Rd, 78738) for all information concerning this project. Thank you for your consideration. Sincerely, Dick and Kathie Hanson 16400 Hamilton Pool Rd; Austin 78738 512-263-412

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 26, 2014 9:50 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001

**From:** [kh@dkhanson.com](mailto:kh@dkhanson.com) [<mailto:kh@dkhanson.com>]  
**Sent:** Monday, March 24, 2014 8:45 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD*  
*90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** MRS Kathleen Malick Hanson

**E-MAIL:** [kh@dkhanson.com](mailto:kh@dkhanson.com)

**COMPANY:**

**ADDRESS:** 16400 HAMILTON POOL RD  
AUSTIN TX 78738-7300

**PHONE:** 5122634121

**FAX:**

**COMMENTS:** March 20, 2014 Office of the Chief Clerk MC 105, TCEQ PO Box 13087 Austin, TX 78711-3087 Re: Proposed Permit No. WQ0015201001 (JPHC, Inc) We are responding to the TCEQ notice of application (shown above) for the Hatchett Tract. We are directly affected by the proposed wastewater treatment plant as our western fenceline of over 1000 feet is shared with the Hatchett tract. We have held a wildlife exemption on our 28 acres for 18 years, during which time we have aggressively attempted to bring

*RM*

back native grasses for more effective replenishment of the underlying Barton Springs segment of the Edwards Aquifer. Furthermore, almost half of the Hatchett property along our fenceline is low-lying with numerous large oaks and fifty Big Muhly grass clumps retaining and releasing run off into the aquifer. (The plan shows that most of this area will be clear cut up to the fence to accommodate 60' x 120' lots) Since the soil in the proposed development is shallow and of poor quality, we are concerned that it will not be able to absorb the volume of irrigated effluent dependably. Such a massive amount of treated wastewater on just 105 acres of land will certainly overwhelm the absorptive capacity of soil and vegetation, raising the possibility of effluent reaching and polluting the wetlands we have observed along our fenceline. We ask that serious consideration be given by the TCEQ to reducing the amount of effluent (and hence the number of proposed LUEs) allowed with this massive development. We also would request that there be a public meeting concerning this application and would like to be put on the mailing list:([dick@dkhanson.com](mailto:dick@dkhanson.com) or 16400 Hamilton Pool Rd, 78738) for all information concerning this project. Thank you for your consideration. Sincerely, Dick and Kathie Hanson  
16400 Hamilton Pool Rd; Austin 78738 512-263-412

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

*MWD*  
*90957*

Re: Proposed TLAP permit number WQ0015201001 (JPHD, Inc.)

Dear TCEQ Chief Clerk,

I am a bordering neighbor of the above-referenced planned development. Little Barton Creek runs through my property, directly downstream from the proposed wastewater treatment plant. I will be directly affected by the proposed wastewater disposal system and am concerned for several reasons:

- The soil in the proposed development is shallow and of poor quality. It will not be able to absorb the proposed volume of irrigated effluent on a dependable basis. Effluent is bound to seep into Little Barton Creek from time to time, impacting water quality.
- Irrigating a massive amount of treated wastewater (450,000 gallons per day) on just 105 acres of land will overwhelm the absorptive capacity of the soil and vegetation, especially during sustained rainy conditions. This will inevitably impact water quality in Little Barton Creek.
- The plant's pollutant removal parameters are not adequate to preclude pollution of Little Barton Creek.
- This large-scale wastewater treatment plant will create odors and noise pollution that will affect nearby homeowners.
- My well may be polluted.

I request that a public meeting be held concerning this application. In addition, please put me on the mailing list for all information related to this project. Thank you for your time and consideration.

Best regards,

*Novella & Henry Heffington*

Novella & Henry Heffington  
6801 Destiny Hills Drive  
Austin, TX 78738  
512-413-9431

REVIEWED

MAR 31 2014

By *[Signature]*

*fm*

CHIEF CLERK'S OFFICE

2014 MAR 31 PM 3:49

CONFIDENTIAL  
ENVIRONMENTAL  
DIVISION

*MWD*

Mrs Novella Heffington  
6801 Destiny Hills Dr  
Austin, TX 78738



RECEIVED  
MAR 31 2014  
TCEQ MAIL CENTER  
MM

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



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

MAR 31 2014 3:49

OPERATIONS OFFICE

POSTNET barcode

POSTNET barcode

March 24, 2014

REVIEWED

PM

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

MWD  
90957

MAR 28 2014

By         

**Re: Proposed TLAP permit number WQ0015201001 (JPHD, Inc)**

I am a homeowner who will be affected by the proposed wastewater treatment plant. Little Barton Creek runs through my property directly downstream from the plant proposed in this application.

I am concerned about the possibility of pollutants from the treatment plant seeping into groundwater and into Little Barton Creek. I'm also concerned about noise pollution and an unpleasant odor coming from the plant.

I request that there be a public meeting concerning this application.

Thank you.

Sincerely,

*Judy Hendricks*

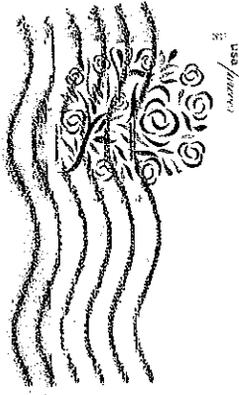
Judy Hendricks  
16618 Destiny Hills  
Austin, TX 78738

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2014 MAR 28 AM 10:03  
CHIEF CLERK'S OFFICE

sent via fax 3/25/2014

*MC*

Judy Hendricks  
16618 Destiny Cove  
Austin, TX 78738



AUSTIN TX TX  
REG GRANGE DISTRICT  
27 MAR 2014 PM 5 L

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 MAR 28 10 33 AM

CHIEF CLERK OFFICE

RECEIVED

MAR 28 2014

TCEQ MAIL CENTER  
JR

Office of the Chief Clerk, MC 105

TCEQ

P.O. Box 13087

Austin, TX 78711-3087



75711308797

March 24, 2014

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

*MWD*  
*90957*

CHIEF CLERK'S OFFICE

2014 MAR 26 AM 8:59

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Re: Proposed TLAP permit number WQ0015201001 (JPHD, Inc)

I am a homeowner who will be affected by the proposed wastewater treatment plant. Little Barton Creek runs through my property directly downstream from the plant proposed in this application.

I am concerned about the possibility of pollutants from the treatment plant seeping into groundwater and into Little Barton Creek. I'm also concerned about noise pollution and an unpleasant odor coming from the plant.

I request that there be a public meeting concerning this application.

Thank you.

Sincerely,

*Judy Hendricks*

Judy Hendricks  
16618 Destiny Hills  
Austin, TX 78738

REVIEWED  
MAR 26 2014  
By *bl*

*fm*

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 26, 2014 9:50 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001

pm

**From:** [jeanna.james@yahoo.com](mailto:jeanna.james@yahoo.com) [mailto:[jeanna.james@yahoo.com](mailto:jeanna.james@yahoo.com)]  
**Sent:** Tuesday, March 25, 2014 3:48 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD  
90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** Jeanna James

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

**COMPANY:**

**ADDRESS:** 7114 DESTINY HILLS DR  
AUSTIN TX 78738-7414

**PHONE:** 5126331930

**FAX:**

**COMMENTS:** To whom it may concern, I am a landowner near to the proposed TLAP permit number WQ0015201001 (JPHD, Inc) development project and have concerns regarding the proposed wastewater treatment plant. - The soil in this area is shallow and of poor quality. How will the proposed plant absorb the proposed volume of irrigated effluent without seeping into Little Barton Creek? - I am concerned that my well will be contaminated - I have concerns about smells emanating from the plant into our neighborhood I request

*MWD*

that TCEQ schedule a public meeting concerning this permit application and ask the developer to address these concerns. Regards,

TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: MARK KILGORE (Eugene Lowenthal)

Mailing Address: 206 HIGH PLAINS DRIVE, DRIPPIN', TX 78620

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

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

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

Email: MH.KILGORE@MAC.COM ✓

Phone Number: \_\_\_\_\_

- 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. ✓ ON REVERSE

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

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

I have heard Mr Lowenthal speak on this issue and would like to be on record as heartily seconding his comments tonight.

✓ GENE LOWENTHAL

✓   
(Mark Kilgore)

**RECEIVED**

DEC 15 2014

AT PUBLIC MEETING



TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

IP# 179717

PLEASE PRINT

Name: CHARLES & DORIS KRAFT

Mailing Address: 9918 CRUMLEY RANCH ROAD

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

City/State: Austin, TX Zip: 78738

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

Email: \_\_\_\_\_

Phone Number: \_\_\_\_\_

- 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.

*Comment on reverse side*

*mw*

I have lived on Crumley Ranch Road for over 46 years. My husband and I raise registered Quarter Horses. One-half mile of Rocky Creek runs through our property, and our horses drink from the creek. Can you assure me that the water in the creek will remain safe with so much development as it?

I have a masters degree in geography, and I fully understand how projects like this can destroy another Hill Country Creek. Please give the land consideration when you make your decision.

D. Stapp

RECEIVED

DEC 15 2014

AT PUBLIC MEETING

ms

①

TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: Gene Lowenthal

Mailing Address: 9600 Cromley Ranch Rd

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

City/State: Austin, TX Zip: 78738

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

Email: gene@lowenthal.net ✓

Phone Number: 512-263-2938

• 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.

*MLC*

RECEIVED

DEC 15 2014

AT PUBLIC MEETING

To: Texas Commission on Environmental Quality  
From: Eugene Lowenthal  
Subject: Comments on JPHD permit (WQ 0015201001)  
Date: December 15, 2014

Little Barton Creek (a tributary of Barton Creek in the Edwards Aquifer watershed) will inevitably be contaminated because:

1. the irrigation application rate is far too high
2. soil conditions in the irrigation areas are very poor
3. some of the irrigation areas are on slopes as steep as 15%
4. the irrigation areas are too close to one or more tributaries of the creek
5. the effluent storage capacity is far too low
6. the allowed limits for TSS, BOD5 and ammonia nitrogen are too high
7. operational problems with subsurface irrigation systems are difficult to detect and isolate

For the same reasons stated above, nearby wells will not be adequately protected from contamination.

There is insufficient protection of neighboring subdivisions from nuisance effluent odors.

There is insufficient protection of neighboring subdivisions from nuisance plant noise and light.

Because the applicant's engineer is subject to unavoidable bias, the TCEQ should require that third party experts assess such crucial aspects as soil conditions and the location of critical environmental features, wetlands, and seeps. This is what Rocky Creek (MUD #16) did.

The TCEQ should conduct a comparative study with Rocky Creek (MUD #16) permit. The agency should require JPHD to design to a higher standard than Rocky Creek.

In view of the WTCPUA's upcoming decision to grant the applicant no more than 700 LUEs of surface water, with no prospect of future LUEs within the permit horizon, the TCEQ should deny the permit on the basis of unsubstantiated need.

Respectfully,  
  
Eugene Lowenthal  
9600 Crumley Ranch Road  
Austin, TX 78738

512-263-2938  
gene@lowenthal.net



TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name:

ED + SANDY LUECKENHOFF

Mailing Address:

17725 Flagler Drive, Austin 78738

Physical Address (if different):

City/State:

Austin, TX

Zip:

78738

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

Email:

LUECK2020@gmail.com

Phone Number:

• 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.

(see reverse)

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

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

RECEIVED

DEC 15 2014

AT PUBLIC MEETING

I respectfully request that TCEQ seek opinions of independent, third-party experts regarding the very serious issues RAISED concerning the Masonwood West Wastewater permit. There clearly is extensive opposition to the developer's plans from large numbers of citizens. The Little Barton Creek watershed is at stake. In my opinion, TCEQ has a responsibility to fully explore these issues AND to consider all viewpoints AND all relevant information.

MJ

TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: Noah Menikoff

Mailing Address: 7900 Lynchburg Dr. Austin 78738

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

City/State: Austin Zip: 78738

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

Email: \_\_\_\_\_

Phone Number: \_\_\_\_\_

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

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

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

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

See reverse

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

*Menikoff*

Some contaminations may be irreversible, especially on sensitive areas such as Little Barton Creek. Notwithstanding the legal requirements and regulations of the permitting process, please consider the consequences of system failures and/or design flaws which may not be rectified with any reactive mitigation. This particular area is home to many delicate natural resources (again, such as Little Barton Creek) which are connected to highly protected environments.

**RECEIVED**

DEC 15 2014

**AT PUBLIC MEETING**

Crly

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, March 27, 2014 9:08 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** CORRECTION FW: Public comment on Permit Number WQ0015201001

PM

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 26, 2014 9:50 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001

*MWD  
20957*

**From:** [mmorabbi@austin.rr.com](mailto:mmorabbi@austin.rr.com) [mailto:[mmorabbi@austin.rr.com](mailto:mmorabbi@austin.rr.com)]  
**Sent:** Monday, March 24, 2014 10:42 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** MR Mehrdad Morabbi

**E-MAIL:** [mmorabbi@austin.rr.com](mailto:mmorabbi@austin.rr.com)

**COMPANY:**

**ADDRESS:** 12004 FORTUNA CV  
AUSTIN TX 78738-5403

**PHONE:** 5122972739

**FAX:**

*MWD*

**COMMENTS:** March 24, 2014 Office of the Chief Clerk MC 105, TCEQ PO Box 13087 Austin, TX 78711-3087 Re: Proposed TLAP No. WQ0015201001 (JPHD, Inc., 17024 Hamilton Pool Road, Austin, Texas 78738)

I am writing to request a public meeting to address many concerns related to the size, location, and the design of the above referenced facility. My property borders the planned development this facility will serve to the East, and Little Barton Creek, directly downstream of the proposed wastewater plant to the North. I am gravely concerned about the following:

- The planned wastewater facility will be constructed to ultimately discharge an average of 450,000 gallons of treated wastewater daily adjacent to Little Barton Creek, a tributary of Barton Creek. The size and the location of the proposed plant greatly risks contamination of Barton Creek.
- Noise abatement measures
- Odor control measures
- Quantities of hazardous chemicals proposed to be stored onsite

I am also requesting to receive all public notices in reference to the above project. Sincerely, Mehrdad Morabbi  
12004 Fortuna Cove Austin, Texas 78738 512-297-2739

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 26, 2014 9:50 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001

**From:** [mmorabbi@austin.rr.com](mailto:mmorabbi@austin.rr.com) [<mailto:mmorabbi@austin.rr.com>]  
**Sent:** Monday, March 24, 2014 10:42 PM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD  
90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** MR Mehrdad Morabbi

**E-MAIL:** [mmorabbi@austin.rr.com](mailto:mmorabbi@austin.rr.com)

**COMPANY:**

**ADDRESS:** 12004 FORTUNA CV  
AUSTIN TX 78738-5403

**PHONE:** 5122972739

**FAX:**

**COMMENTS:** March 24, 2014 Office of the Chief Clerk MC 105, TCEQ PO Box 13087 Austin, TX 78711-3087 Re: Proposed TLAP No. WQ0015201001 (JPHD, Inc., 17024 Hamilton Pool Road, Austin, Texas 78738) I am writing to request a public meeting to address many concerns related to the size, location, and the design of the above referenced facility. My property borders the planned development this facility will serve to the East, and Little Barton Creek, directly downstream of the proposed wastewater plant to the North. I am gravely

*MWD*

concerned about the following: • The planned wastewater facility will be constructed to ultimately discharge an average of 450,000 gallons of treated wastewater daily adjacent to Little Barton Creek, a tributary of Barton Creek. The size and the location of the proposed plant greatly risks contamination of Barton Creek. • Noise abatement measures • Odor control measures • Quantities of hazardous chemicals proposed to be stored onsite I am also requesting to receive all public notices in reference to the above project. Sincerely, Mehrdad Morabbi  
12004 Fortuna Cove Austin, Texas 78738 512-297-2739



# City of Austin

Founded by Congress, Republic of Texas, 1839  
Watershed Protection Department  
P.O. Box 1088, Austin, Texas 78767

September 8, 2014

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

*MWD  
90957*

**REVIEWED**

SEP 09 2014

By *[Signature]*

*PM*

CHIEF CLERKS OFFICE

2014 SEP - 8 PM 4: 17

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

RE: Draft Texas Land Application Permit (TLAP) No. WQ0015201001 for JPHD, Inc.

Dear Ms. Bohac:

I am filing these comments on behalf of the City of Austin (the "City") and also requesting that the TCEQ set the above referenced matter for a public meeting to receive further questions and comments concerning this draft permit. We also respectfully request that the permit not be approved as drafted, but be revised to include provisions necessary to protect water quality, as discussed herein.

The City has direct interests in the water quality of Little Barton Creek downstream from the land application sites and the quality of water recharging the Barton Springs segment of the Edwards Aquifer. The City has acquired through conservation easement and fee simple acquisition 969 acres in the Little Barton Creek watershed as permanently protected open space through the City of Austin Water Quality Protection Lands program. This land is permanently protected from development to preserve the quality and quantity of recharge to sensitive karst features and maintain the quality of surface water resources in the contributing and recharge zones of the Edwards Aquifer. The land application facility if operated as proposed in the draft permit would result in water quality degradation that would adversely impact these lands.

Based on the information available in the permit application file and the draft permit, the City has the following concerns:

1. Based on soil testing information provided in the application, twenty-four (24) soil test hole descriptions indicate existing soils are unsuitable for wastewater effluent disposal. In all but four (4) test holes, caliche layers were described at less than 18 inches below the surface. Caliche, as an indurated layer, is a restrictive layer and therefore soil depth requirements of the draft permit Special Provision 12 cannot be met with existing soils. Additionally, 30 TAC 222.125(2) requires at least one foot of soil over any restrictive horizon in addition to the minimum 6 inches of soil that must overlay the subsurface irrigation lines. Each application area will require importation of substantial amounts of soil. Any imported soil should be properly incorporated with on-site native soils.
2. Soil texture descriptions provided in the application materials are inaccurate for complete evaluation. Additionally, soil trench floors are not described in the application materials.

*[Handwritten signature]*

The use of Natural Resource Conservation Service soil information may be generally accurate, but locally misleading. More thorough on-site soil evaluation is necessary.

3. Soil macropore and preferential flow path characteristics are not described in the application materials, including: desiccation cracks; macropore flow paths inside and outside soil peds and coarse fragments; flow paths in plant root channels; and flow paths within pedoturbation by burrowing insects and mammals. Soil-water preferential flow paths that would limit residence time of effluent in the root zone need to be identified and described in accordance with 30 TAC 222.77 and remedied to ensure that groundwater will not be adversely impacted.
4. Given the existing shallow soils over the caliche restrictive layer and likely existence of preferential soil-water flow paths, the hydraulic application rate should be re-evaluated to ensure no seepage or percolation of the effluent out of the root zone.
5. Because of the substantial amounts of soil importation likely required to meet the conditions of the draft permit, management and monitoring plans cannot be finalized until soil requirements are addressed satisfactorily.
6. The geology and hydrogeology information in the application materials and Recharge Feature Plan is inadequate to determine if no discharge of pollutants to surface water or groundwater resources will occur from this disposal system. No survey information of the land application site was provided concerning existing groundwater seeps or springs. The Upper Glen Rose Formation of the Trinity Group is not described. Local perched water tables of the Upper Glen Rose are not described. Hydrologic losses from the root zone, discharges to shallow groundwater, and potential subsurface flows to adjacent surface waters are not described. Hydrologic connections between perched water tables and surface waters or soil preferential flow paths are not described. Lateral water flow potential is not described, and a Shallow Groundwater Monitoring Plan is not provided. Caliche layers below the soil surface are not described for the site.
7. Draft permit special provision 33 requires 100 foot minimum buffer zones from all surface water features. The necessary assurances for adequate buffer zones are not provided as drip fields 4, 5 and 6 on the map included with the application appear to encroach on the required buffers. Buffers should be 100 feet minimum as measured perpendicularly from both sides of the stream centerlines of all surface water features on the site. Buffer zones are not shown for all surface water drainages on the application maps. The schematic map included in the draft permit is not sufficient to evaluate compliance with buffer zone requirements and to ensure adequate protection for surface water resources. The Recharge Feature Plan included in the application specify stream buffers as small as 25 feet from the stream centerline and only for surface water features draining 5 or more acres which would be inconsistent with draft permit provision 33. Analysis of nitrogen and oxygen isotopes of nitrate by the City and the U.S. Geological Survey have documented strong biogenic signatures in upper Bear Creek adjacent to an existing Texas Land Application Permit disposal facility, indicating the high potential for unintended wastewater effluent migration from land application disposal facilities to adjacent surface waters in the contributing zone of the Edwards Aquifer. (<http://pubs.usgs.gov/sir/2011/5018/>).

8. Travis County land development rules require stream buffers to be created, and wastewater disposal should not be conducted within these buffer zones. According to a June 19, 2014, policy statement from the West Travis County Public Utility Agency, the water provider for the proposed development, the proposed development must comply with additional water quality protection measures including impervious cover limitations and buffer zones. Travis County and West Travis County Public Utility Agency require development buffer zones around surface water features be included on the maps, and the area included within these buffer zones should not be included in the calculation of the land available for wastewater disposal to ensure that appropriate application rates are maintained throughout all phases of the permit up to the final phase permitted volume.
9. Subsurface wastewater disposal in areas with greater than 15% slopes are displayed within several irrigation areas on the application map. These areas should be evaluated for compliance with soil depth requirements. Vegetation with 100% coverage must be established prior to subsurface drip dispersal of effluent in these areas, and maintained throughout the life of the system. This design ensures effluent will remain within the root zone. Without this provision in the draft permit, these areas with greater than 15% slope should not be included in the evaluation of the land available for wastewater disposal.
10. The draft permit specifies 6 application areas although only 5 are evident on the schematic map provided in the draft permit. The map in the draft permit should include higher resolution and indicate all proposed irrigation areas.
11. The effluent treatment limits in the draft permit are not sufficiently protective to ensure no adverse impacts to surface water and groundwater resources. Analysis of nitrogen and oxygen isotopes of nitrate by the City and the U.S. Geological Survey have documented strong biogenic signatures in upper Bear Creek adjacent to an existing Texas Land Application Permit disposal facility, indicating the high potential for unintended wastewater effluent migration from land application disposal facilities to adjacent surface waters in the contributing zone of the Edwards Aquifer. The weight of existing scientific evidence clearly documents the sensitivity of Edwards Plateau streams to any nutrient addition. Because of the lack of information presented in the application materials to adequately assess subsurface shallow groundwater lateral flow and documented sensitivity of area surface waters to nutrient enrichment, a more stringent effluent set is necessary. Neighboring facilities including the Rocky Creek Ranch Wastewater Treatment Facility (WQ0014664001) and Lake Point Wastewater Treatment Facility (WQ0013594001) both require more stringent effluent limits of 5 mg/L carbonaceous 5-day biochemical oxygen demand, 5 mg/L total suspended solids, and 2 mg/L ammonia nitrogen. Nutrient limits should be included in the draft permit, and determination of appropriate nutrient limits should be based on limiting water quality impacts and documented with valid technical analysis. Application of the standard subsurface drip disposal effluent requirements is inadequate given the documented sensitivity of surface water and groundwater resources in this area.
12. The City is a partner in the Texas Clean Rivers Program and routinely provides data to TCEQ for inclusion in Clean Water Act 303(d) and 305(b) assessments from Barton Creek. The City additionally has collected routine environmental monitoring data from multiple locations in Little Barton Creek through the City's Environmental Integrity

Index (EII) program since 1999. Based on the most recent 2012-2013 EII scores, the Little Barton Creek watersheds rank second highest in overall watershed integrity out of 49 watersheds assessed in the Austin area. Because of the City's active role in acquiring, assessing and providing data to TCEQ from the region, the City respectfully requests that a copy of the Seeps/Springs Monitoring Plan be provided to the City for review and comment, and that copies of all data generated from sampling under the Seeps/Springs Monitoring Plan also be provided to the City on a regular basis.

13. The background monitoring required for the Seeps/Springs Monitoring Plan in draft permit special provision 38 is not sufficient to adequately characterize groundwater quality in the area. At least 10 background samples should be collected to adequately characterize natural variation prior to irrigation. Fecal indicator bacteria should be added to the list of required analytes.
14. A permit term of less than 10 years is needed to re-evaluate if subsurface disposal practices and site specific conditions following soil importation and incorporation are sufficient to avoid adverse impacts to surface water and groundwater resources in the area. The City supports the expiration of the permit no later than 2019.

Thank you for your consideration of this request. If you have questions or concerns please contact me at 512-974-2652 or please contact Assistant City Attorney Ross Crow at 512-974-2159.

Sincerely,



Mike Personett, Assistant Director  
Watershed Protection Department

cc: Ross Crow, Assistant City Attorney, Law Department  
Chris Herrington, P.E., Supervising Engineer, Watershed Protection Department  
Abel Porras, P.E., Engineer C, Watershed Protection Department

CITY OF AUSTIN  
WATERSHED PROTECTION  
DEPARTMENT  
ENVIRONMENTAL RESOURCE  
MANAGEMENT DIVISION  
P.O. BOX 1088  
AUSTIN, TEXAS 78767

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

2014 SEP -8 PM 4:20  
CHIEF CLERK'S OFFICE  
TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

**First Class Mail**  
**First Class Mail**

March 15, 2014

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

*MWD  
90957*

CHIEF CLERK'S OFFICE

2014 MAR 25 AM 9:56

COMMISSIONER  
ON ENVIRONMENTAL  
QUALITY

**Re: Proposed Permit No. WQ0015201001 (JPHC, Inc)**

On two sides of my property, I am a bordering neighbor of the planned development referenced above on Hamilton Pool Road, also known as the Hatchett Tract. I received your notice of the receipt of application. I will be directly and adversely affected by the wastewater disposal system for the development as planned.

Most pertinently, I am opposed to this application because the developer, having proposed an intensely dense development on hilly rocky thin soil, proposes to discharge 450,000 gallons of treated effluent per day above a tributary of Barton Creek, and above a dry creek that bisects my property. Since LCRA engineered the access to install the tank on the Hatchett property several years ago, and because of the drought and severe weather patterns of the last few years, this runoff has caused erosion at an alarmingly elevated rate across my property, but at least it was natural rain water. This process will continue at a greatly increased rate, and with effluent that will inevitably and substantially contribute to pollution of the Barton Springs segment of the Edwards Aquifer. I believe that it is irresponsible development practice to propose that the amount of effluent (and hence the number of proposed LUEs) will be sustainable, and the absorptive capacity of the poor and rocky soil and thin vegetation will be quickly overwhelmed. Furthermore, the plant's pollutant removal parameters are not adequate to preclude pollution, even if the amount of effluent were decreased.

Second, I request that there be a public meeting concerning this application.

Third, please keep me on the mailing list for all information related to this project.

Sincerely,



Paula Priour  
17120 Hamilton Pool Road  
Austin, Texas 78738

512-923-9273  
ppriour@yahoo.com ✓

REVIEWED *PM*

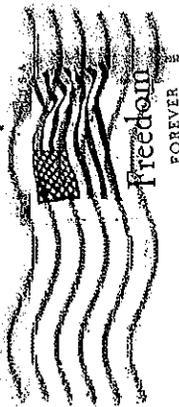
MAR 26 2014

By *[Signature]*

*[Handwritten mark]*



PAULA PRIOR  
17120 HAMILTON POOL RD  
AUSTIN TX 78738-7101



AUSTIN TX 787  
RIO GRANDE DISTRICT  
29 MAR 2014 PM 2 L

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 MAR 25 AM 9:56

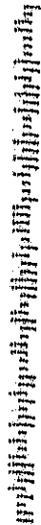
CHIEF CLERK'S OFFICE

RECEIVED

MAR 25 2014

TCEQ MAIL CENTER  
MT

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



78711308767

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 24, 2014 8:22 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001  
**Attachments:** TCEQ letter20141.doc

PM

**From:** [ppriour@yahoo.com](mailto:ppriour@yahoo.com) [<mailto:ppriour@yahoo.com>]  
**Sent:** Sunday, March 23, 2014 8:50 AM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

*Handwritten:* FFS 609  
Don't

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** Paula Priour

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

**COMPANY:**

**ADDRESS:** 17120 HAMILTON POOL RD  
AUSTIN TX 78738-7101

**PHONE:** 5129239273

**FAX:**

**COMMENTS:** Please refer to attached letter.

*Handwritten signature:* M W

March 15, 2014

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

**Re: Proposed Permit No. WQ0015201001 (JPHC, Inc)**

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Sincerely,

Paula Priour  
17120 Hamilton Pool Road  
Austin, Texas 78738

512-923-9273  
ppriour@yahoo.com

Lisa & Desi Rhoden  
7111 Destiny Hills Dr.  
Austin, TX 78738-7419

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

*ES609  
Dm*

TEXAS  
COMMISSION ON ENVIRONMENTAL  
QUALITY  
2014 MAR 25 AM 9:54  
CHIEF CLERK'S OFFICE

**RE: Proposed TLAP permit number WQ0015201001 (JPHD, Inc)**

Dear Chief Clerk,

We are nearby affected landowners to the Hatchett tract and are concerned about the proposed wastewater treatment plant referenced above.

We believe there is a significant threat to Little Barton Creek and the Barton Springs segment of the Edwards Aquifer. Being on a well, we are concerned about contamination of our well and of our neighbor's wells. We believe the proposed wastewater treatment plant is not sufficient for the following reasons:

- The soil in the proposed development is shallow and of poor quality. We are concerned that it will not be able to absorb the proposed volume of irrigated effluent on a dependable basis. Effluent is bound to seep into Little Barton Creek from time to time, impacting water quality.
- Irrigating a massive amount of treated wastewater (450,000 gallons per day) on just 105 acres of land will overwhelm the absorptive capacity of the soil and vegetation, especially during sustained rainy conditions. This will inevitably impact water quality in Little Barton Creek.
- The proposed plant's pollutant removal parameters are not adequate to preclude pollution of Little Barton Creek.
- This large-scale wastewater treatment plant will create odors and noise pollution that will affect nearby homeowners in the Destiny Hills subdivision.

We hereby request a Public Meeting so the affected landowners can have their concerns heard. Also, please place us on the mailing list for all information related to this project.

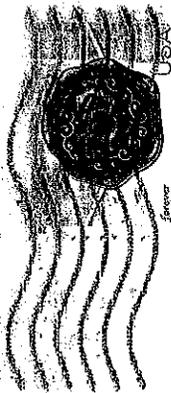
Best regards,

REVIEWED *pm*  
MAR 26 2014  
By *pk*

*Desi Rhoden*  
Desi Rhoden ✓

*Lisa Rhoden*  
Lisa Rhoden ✓

*pm*



AUSTIN TX 787  
RIO GRANDE DISTRICT  
MAR 2014 PM 2 L  
**RECEIVED**

MAR 25 2014

TCEQ MAIL CENTER  
MT

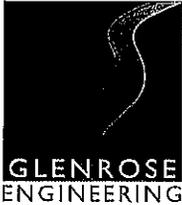
TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 MAR 25 AM 9:54

CHIEF CLEANUP OFFICE

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

Lisa Rhoden  
7111 Destiny Hills Dr  
Austin, TX 78738  
USA



Submitted by ~~Lauren Kelly~~ '15  
On behalf of Dr. Ross

P. O. Box 1948  
Austin, Texas 78767-1948  
Phone: 512-326-8880  
e-mail: lauren@glenrose.com ✓

December 15, 2014

**RECEIVED**  
DEC 15 2014  
**AT PUBLIC MEETING**

Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Mail Code MC-105  
P.O. Box 13087  
Austin, Texas 78711-3087  
Submitted electronically at [www.tceq.texas.gov/about/comments.html](http://www.tceq.texas.gov/about/comments.html)

**Subject: Draft JPHD, Inc. Wastewater Texas Land Application Permit WQ0015201001**

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The proposed wastewater treatment technology is an activated sludge extended aeration system to meet a daily average effluent standard of 10 milligrams per liter five-day biochemical oxygen demand, 15 milligrams per liter total suspended solids.

Wastewater effluent would be land-applied using a subsurface drip system to irrigate non-native grass turf with winter over seeding. Effluent storage equivalent to three days of average wastewater effluent generation would be required.

The following issues demonstrate that the proposed wastewater system will not meet the requirements of the TCEQ rules, and specifically the requirements of 30 TAC §309.3(f)(6)

*ML*

which states: *"Use of subsurface area drip dispersal systems shall be consistent with environmental safeguards and the protection of ground and surface waters."*

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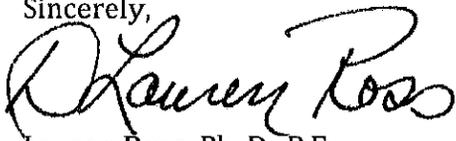
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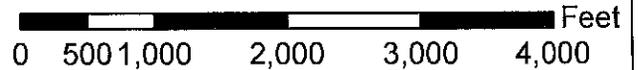
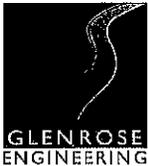
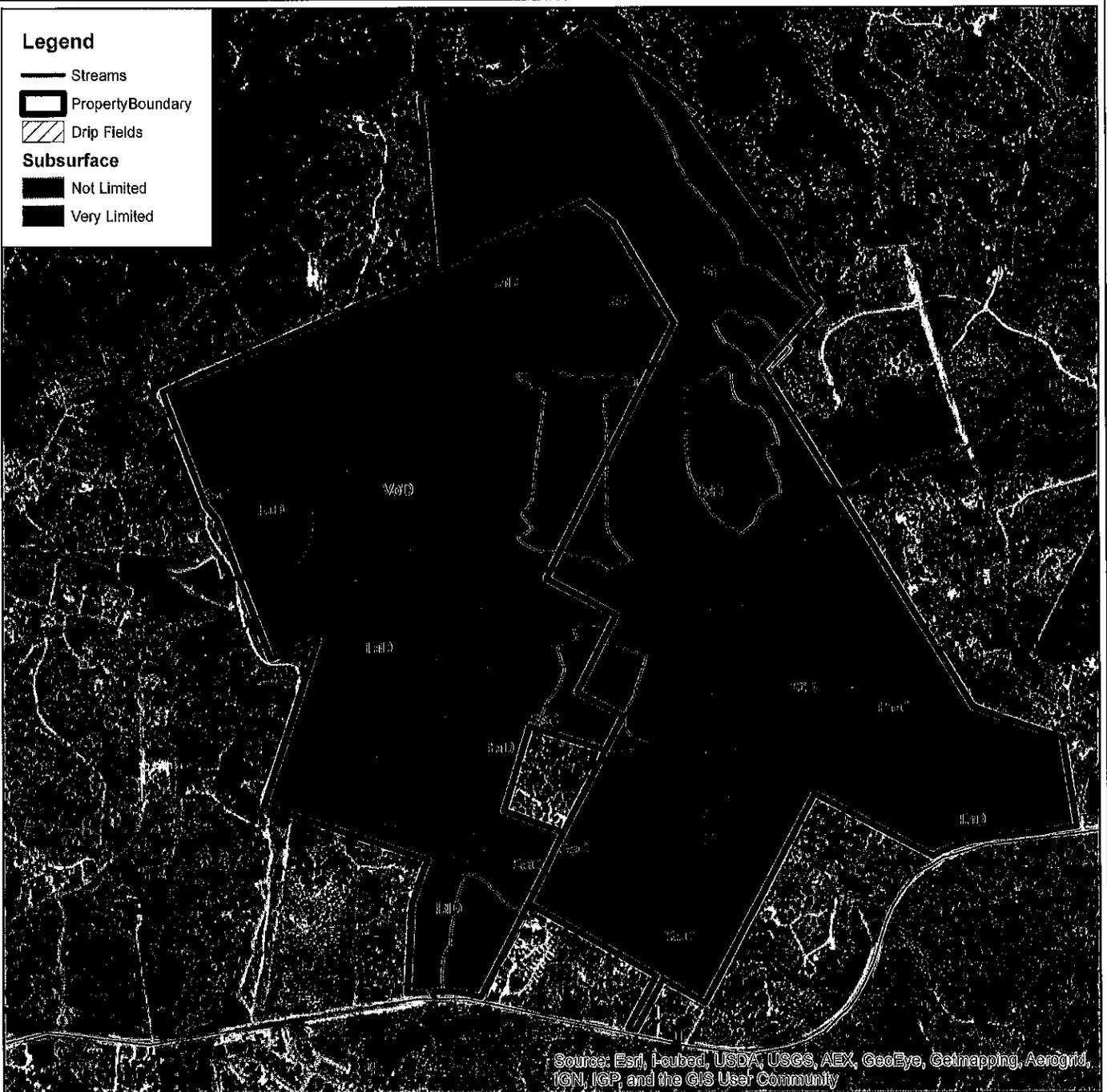
Sincerely,

  
lauren Ross, Ph. D., P.E.



**Legend**

-  Streams
-  Property Boundary
-  Drip Fields
- Subsurface**
-  Not Limited
-  Very Limited



Texas Board of Professional Engineers  
License Number F4092

Soils as mapped by the  
Natural Resources Conservation Services,  
[http://websoilsurvey.sc.egov.usda.gov/  
App/WebSoilSurvey.aspx](http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx)

## JPHD, Inc. Wastewater TLAP Proposed Irrigation Fields and Soil Suitability for Subsurface Irrigation

December 15, 2104

**mweber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, December 16, 2014 10:03 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001  
**Attachments:** MasonwoodTLAP201412151.pdf

**From:** [lauren@glenrose.com](mailto:lauren@glenrose.com) [<mailto:lauren@glenrose.com>]  
**Sent:** Monday, December 15, 2014 3:19 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD  
90957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** DR. Lauren Ross

**E-MAIL:** [lauren@glenrose.com](mailto:lauren@glenrose.com)

**COMPANY:** Glenrose Engineering, Inc.

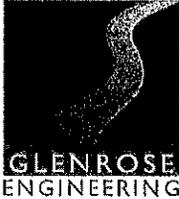
**ADDRESS:** PO BOX 1948  
AUSTIN TX 78767-1948

**PHONE:** 5123268880

**FAX:**

**COMMENTS:** Comments are in the attached pdf.

*ML*



*P. O. Box 1948  
Austin, Texas 78767-1948  
Phone: 512-326-8880  
e-mail: lauren@glenrose.com*

December 15, 2014

Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Mail Code MC-105  
P.O. Box 13087  
Austin, Texas 78711-3087  
Submitted electronically at [www.tceq.texas.gov/about/comments.html](http://www.tceq.texas.gov/about/comments.html)

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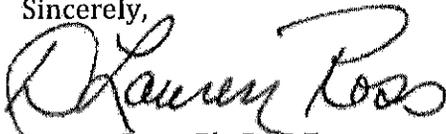
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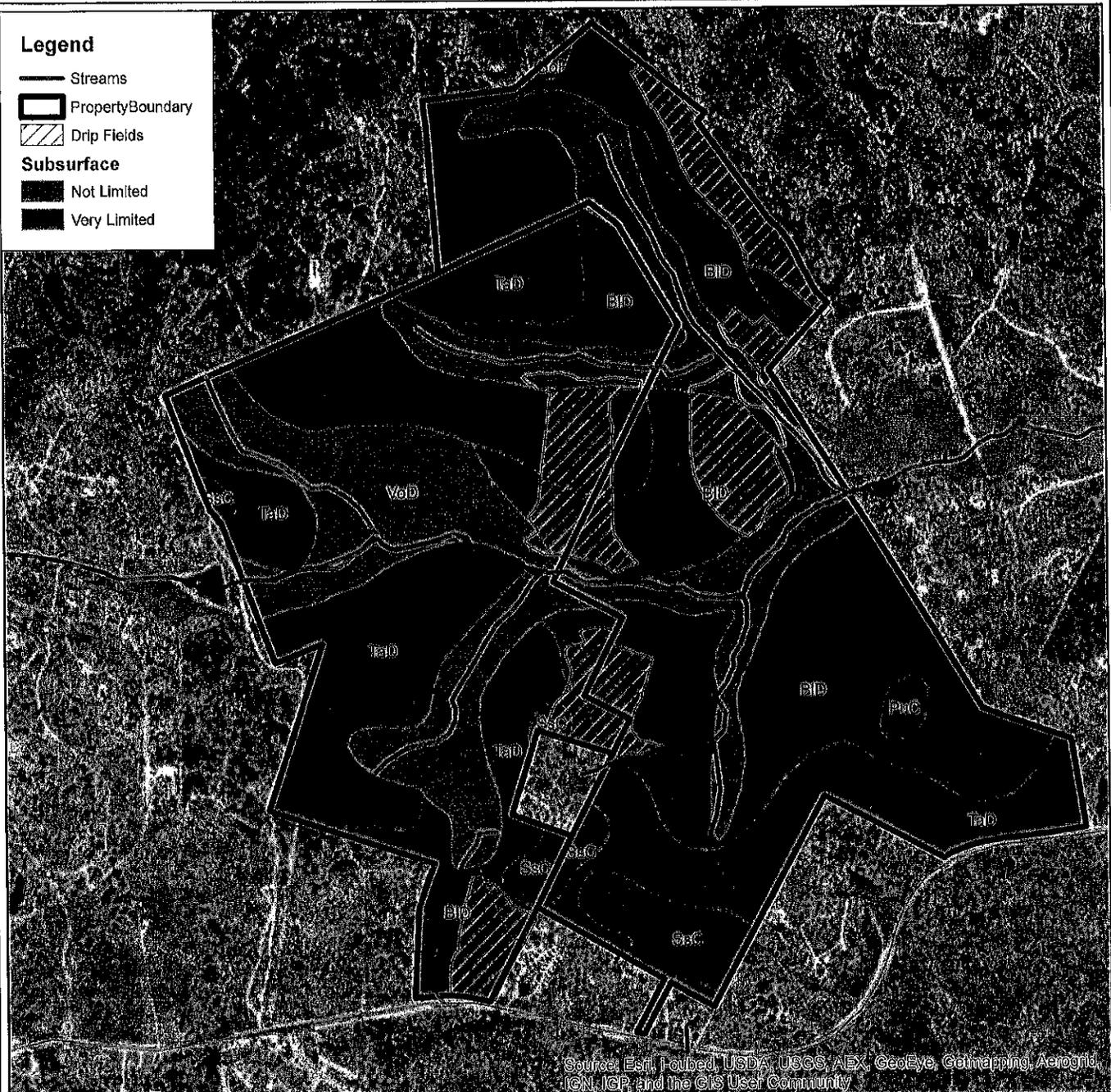
Sincerely,

  
Lauren Ross, Ph. D., P.E.

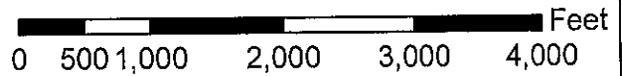
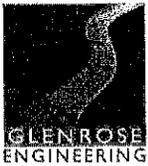


**Legend**

- Streams
- ▭ Property Boundary
- ▨ Drip Fields
- Subsurface**
- Not Limited
- Very Limited



Source: Esri, Fugro, USDA, USGS, AEX, GeoEye, Geomapping, AeroGRID, IGN, IGP, and the GIS User Community



Texas Board of Professional Engineers  
License Number F4092

Soils as mapped by the  
Natural Resources Conservation Services,  
[http://websoilsurvey.sc.egov.usda.gov/  
App/WebSoilSurvey.aspx](http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx)

## JPHD, Inc. Wastewater TLAP Proposed Irrigation Fields and Soil Suitability for Subsurface Irrigation

December 15, 2104

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 24, 2014 9:48 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001

PM

**From:** [karen\\_stewart@cargill.com](mailto:karen_stewart@cargill.com) [mailto:[karen\\_stewart@cargill.com](mailto:karen_stewart@cargill.com)]  
**Sent:** Monday, March 24, 2014 9:46 AM  
**To:** [donotReply@tceq.state.tx.us](mailto:donotReply@tceq.state.tx.us)  
**Subject:** Public comment on Permit Number WQ0015201001

*MWD  
70957*

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** Karen Stewart

**E-MAIL:** [karen\\_stewart@cargill.com](mailto:karen_stewart@cargill.com)

**COMPANY:**

**ADDRESS:** 7016 DESTINY HILLS DR  
AUSTIN TX 78738-7413

**PHONE:** 5122639645

**FAX:**

**COMMENTS:** To the Office of the Chief Clerk, I am a resident adjacent to the proposed Masonwood development on the Hatchett Tract. I am writing to express my significant concerns with the proposed wastewater treatment plant and its proximity to the homes on Destiny Cove and Destiny Hills Drive. Among my many concerns with this development are the following: 1. This large wastewater treatment plant will create odors and other pollution that will be a detriment to our outdoor quality of life and, subsequently, our property.

*MS*

values. Residents in my neighborhood have invested heavily in our homes, yards, and pools because we enjoy the peaceful outdoors where we live. The proposed wastewater treatment plant stands a very high chance of destroying that lifestyle we've worked hard to create. 2. I am very concerned that the wastewater treatment plant, and its effluent and/or runoff, will contaminate my water well -- the water I drink and bath in daily. 3. The soil conditions in our area are simply not rich enough to absorb the massive amount of treated wastewater that this plant will produce every day. 4. I believe it is inevitable that runoff from the proposed plant will contaminate Little Barton Creek and impact water quality for it and everything downstream. As a very concerned homeowner, I am requesting that a public meeting be held concerning this permit application. Please keep me updated on the status of such public meeting. Sincerely, Karen Stewart 7016 Destiny Hills Drive Austin, TX 78738

REVIEWED

MAR 28 2014

By [Signature]

Hank Stringer  
15603 Hamilton Pool Road  
Austin, Texas 78738

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

MWD  
90957

CHIEF CLERK'S OFFICE

2014 MAR 28 AM 10:07

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

RE: proposed TLAP permit number WQ0015201001 (JPHD, Inc.)

To whom it may concern,

I am writing in regards to the **Proposed TLAP permit number WQ0015201001 (JPHD, Inc.)**. My family has lived on Little Barton Creek for over 10 years and the first few years we especially enjoyed the creek's natural beauty. When we moved here the creek was clear and it was easy to see the limestone bottom. I'm afraid that is no longer the case, as development and I believe livestock upstream have clouded the stream with algae.

As you may be aware the soil here is shallow and when we experience any rain the runoff goes directly into the creek and thus the problem with the proposed TLAP permit number WQ0015201001 (JPHD, Inc.).

I understand the proposed development upstream intends to irrigate using a massive 450,000 gallons of wastewater per day. With the shallow soil and my direct experience this wastewater will end up in Little Barton Creek. I understand development, however is this truly the best way to irrigate on land where we know the consequences to the creek and neighbors?

I also understand that the size of the wastewater plant intended will most likely result in noise pollution and bad odors that will negatively affect neighbors.

[Handwritten initials]

It appears the intentions here don't take Little Barton Creek or neighbors into account. There have been other developments in the area that have worked with the local neighbors to protect the land and I am interested to understand why this can't be the case here.

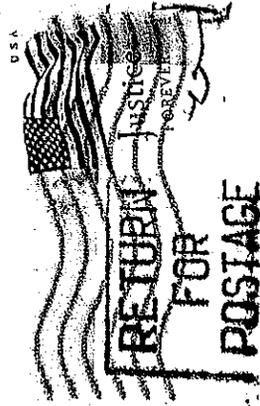
I live on Hamilton Pool Road and have watched the development of the area over ten years and maybe, just maybe if we work together, take the time and make the goal clean, neighborly development first and profitability second, generations past us will be able to enjoy the Hill of Country of Texas we love.

Sincerely,

Hank Stringer

HANK STRINGER  
15603 HAMILTON POOL RD  
AUSTIN, TX. 78738

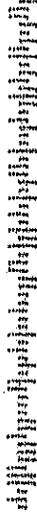
AUSTIN  
TX 787  
MAY 11 10 30  
2500 GRANDE DISTRICT  
FM 227 MAR 2014 PM 4 L



RECEIVED  
MAR 28 2014  
TCEQ MAIL CENTER  
BC

OFFICE OF THE CHIEF CLERK MC-105  
PO BOX 13087  
AUSTIN, TX 78711-3087  
CHIEF CLERKS OFFICE  
2014 MAR 28 AM 10:07  
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

78711308787



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 MAR 23 AM 10:07

CHIEF CLERK'S OFFICE

MWD  
90957

March 27, 2014

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

Re: Proposed Permit No. WQ0015201001 (JPHC, Inc)

I am responding to the TCEQ notice of application for the Hatchett Tract. I am the owner of a ranch locate one mile south of the Hatchett Tract that is affected by the proposed wastewater treatment plant because of the potential of runoff into Rocky Creek.

Our property has one half mile of Rocky Creek located on it and is used to graze cattle, goats and horses.

I ask that serious consideration be given by the TCEQ to reducing the amount of effluent (and the number of proposed LUEs) allowed with this huge development.

I also would request that there be a public meeting concerning this application and would like to be put on the mailing list:([tvanackeren@ogspipeline.com](mailto:tvanackeren@ogspipeline.com) or 10017 Crumley Ranch Road, 78738) for all information concerning this project.

Regards,

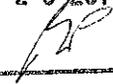


Tim Van Ackeren  
10017 Crumley Ranch Road, Austin 78738  
512-773-0194

REVIEWED

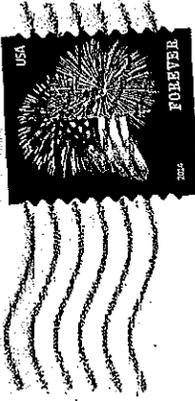
PM

MAR 28 2014

By 



Tim Van Ackeren  
907 RR 620 South, Suite 201  
Austin, Texas 78734



AUSTIN TX 787  
RIO GRANDE DISTRICT  
27 MAR 2014 PM 4 L

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 MAR 28 AM 10: 06

CHIEF CLERK'S OFFICE

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

RECEIVED  
MAR 28 2014  
TCEQ MAIL CENTER  
BC

78711308787

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 MAR 27 PM 12: 25

CHIEF CLERKS OFFICE

March 27, 2014

Office of the Chief Clerk  
MC 105, TCEQ  
PO Box 13087  
Austin, TX 78711-3087  
Re: Proposed Permit No. WQ0015201001 (JPHC, Inc)

*MWD  
70957*

I am responding to the TCEQ notice of application for the Hatchett Tract. I am the owner of a ranch locate one mile south of the Hatchett Tract that is affected by the proposed wastewater treatment plant because of the potential of runoff into Rocky Creek.

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Regards,



Tim Van Ackeren  
10017 Crumley Ranch Road, Austin 78738  
512-773-0194

REVIEWED

*pm*

MAR 27 2014

By *BP*

*MWD*

**Tim Van Ackeren**

907 RR 620 SOUTH, SUITE 201  
AUSTIN, TEXAS 78734  
PHONE: 512-810-5100  
FACSIMILE: 512-810-5108

# Fax

**To:** TCEQ **From:** Tim Van Ackeren

---

**Fax:** 512-239-3311 **Phone:** 512-773-0194

---

**Phone:** **Date:** February 27, 2014

---

**Re:** Proposed Permit **CC:**

---

**Pages:** 2 (including cover page)

Urgent     For Review     Please Comment     Please Reply     Please Recycle

● **Comments**

TEXAS  
 COMMISSION  
 ON ENVIRONMENTAL  
 QUALITY  
 2014 MAR 27 PM 12:27  
 CHIEF CLEANUP OFFICE

3

TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: Thomas Weber

Mailing Address: Travis Co, PO Box 1746, Austin TX  
78767

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

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

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

Email: thomas.weber@traviscountytx.gov ✓

Phone Number: 512.854.4629

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

If yes, which one? Travis Co

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.

*mw*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, August 22, 2014 11:58 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015201001  
**Attachments:** WW-comments.docx.doc

*MWD*  
*910957*

**From:** [thomas.weber@co.travis.tx.us](mailto:thomas.weber@co.travis.tx.us) [mailto:[thomas.weber@co.travis.tx.us](mailto:thomas.weber@co.travis.tx.us)]  
**Sent:** Friday, August 22, 2014 8:08 AM  
**To:** [donotReply@tceq.texas.gov](mailto:donotReply@tceq.texas.gov)  
**Subject:** Public comment on Permit Number WQ0015201001

**REGULATED ENTY NAME** JPHD WWTP

**RN NUMBER:** RN107010209

**PERMIT NUMBER:** WQ0015201001

**DOCKET NUMBER:**

**COUNTY:** TRAVIS

**PRINCIPAL NAME:** JPHD INC

**CN NUMBER:** CN604489724

**FROM**

**NAME:** MR Thomas W Weber

*(Don A. White)*

**E-MAIL:** [thomas.weber@co.travis.tx.us](mailto:thomas.weber@co.travis.tx.us)

**COMPANY:** Travis County, TNR

**ADDRESS:** PO BOX 1748  
AUSTIN TX 78767-1748

**PHONE:** 5128544629

**FAX:**

**COMMENTS:** See attached letter (15201-wastewater comments.pdf)

*MWD*

## TRANSPORTATION AND NATURAL RESOURCES

STEVEN M. MANILLA, P.E., COUNTY EXECUTIVE

---



700 Lavaca 5<sup>th</sup> Floor  
Travis County Administration Building  
PO Box 1748  
Austin, Texas 78767  
Phone: (512) 854-9383  
Fax: (512) 854-4697

August 20, 2014

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

RE: Draft Texas Land Application Permit (TLAP) No. WQ-0015201-001, JPHD, Inc.

Dear Ms. Bohac:

Thank you for the opportunity to comment on the above-referenced draft permit prepared by your agency. The proposed wastewater facilities would serve the Masonwood West development. The Travis County Commissioners' Court approved the Master Development Plan for this development, a preliminary step in the subdivision process.

The Travis County Transportation & Natural Resources Department (TNR) has a direct interest in this TLAP matter, in that the TCEQ mandates Travis County to appropriately operate a Municipal Separate Storm Sewer System and prevent illicit discharges into storm water conveyances and water in the State.

### Comments:

1. The proposed ten-year term of the permit is excessive in duration. A much shorter term is more appropriate in order to evaluate and update terms and conditions based upon new State requirements, technological advances, the results of soil testing, seep and spring monitoring results, and the compliance history of the permit holder and operator. Considering site-specific conditions like topographic slopes, poor existing soil, and a pollution-sensitive watershed, the permit should have a maximum term of five years.
2. Special Provision 3 requires "optimum efficiency" with regard to wastewater facility operation and maintenance. Special Provision 12 requires shut-off to a drip irrigation zone due to surfacing. Both provisions are appropriate standards. However, these standards cannot be achieved with a requirement allowing only minimal (weekly) monitoring of drip irrigation fields (Special Provision 19). Since six application fields with a total of 36 zones are proposed, the actual observation of the performance of each zone will be unlikely during each weekly

monitoring of the conditions. Special Provision 19 should include the following more comprehensive requirements:

- A minimum of daily monitoring of the irrigation system to ensure it is properly functioning, properly cycling through zones, and a walk through to determine if there is evidence of current or recent surfacing, soil erosion, or hydraulic overload in each irrigation zone; and
- Daily notations by the certified operator on a written log of the inspection date, the irrigation zones (1 – 36) that were operating during the inspection, deficiencies discovered, the corrective action taken, and date corrective actions were taken.

3. The minimum surface area required for irrigation in the permit must not include land restricted from irrigation. The effluent limitation of daily average flow must be limited by the land available for irrigation. A buffer of 100 feet minimum from all surface water features is required by TCEQ rules. Public water utility restrictions may affect the pending platting of the subdivision and the land available for wastewater disposal. TNR believes it would be prudent for the TCEQ to refine/modify the final phase volume after further information from the applicant becomes available.

If you have any questions or concerns on this matter, please contact Mr. Thomas Weber of my staff at (512) 854-4629.

Sincerely,

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

TCEQ Public Meeting Form  
December 15, 2014

JPHD, Inc.  
Water Quality Permit  
Permit No. WQ0015201001

PLEASE PRINT

Name: HUGH WINKLER

Mailing Address: 9510 MOR DR.

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

City/State: Dripping Springs Zip: 78620

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

Email: hwinkler99@yahoo.com

Phone Number: 512 961 6428

- 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.

*MW*

As a resident of Hamilton Pool Rd area,  
I'm concerned about discharge of surface and  
wastewater into neighboring creeks. Please  
~~strictly enforce effluent regulations and do not~~

Caliche, clay, and limestone are the  
worst possible components for buffering effluent.  
Effluent will reach the creek despite the  
system meeting minimum regulations. TCEQ  
should ensure effluent does not reach the creek.

The application relies on complex engineered  
machinery, ~~to~~ like sensors and applicators, that  
will fail at some random time, causing overflow.  
TCEQ should consider the "black swan"  
events and make sure even those rare occurrences  
are managed.

RECEIVED

DEC 15 2014

AT PUBLIC MEETING

MW

March 23, 2014

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

ES602  
MWD

CHIEF CLERK'S OFFICE

2014 MAR 25 AM 9:57

TEXAS  
COMMISSION ON ENVIRONMENTAL  
QUALITY

Re: Proposed TLAP Permit No. WQ00152001001 (JPHD, Inc.)

First, I am a bordering neighbor of the planned development in Destiny Hills Section 1. I did not receive your notice of the receipt of application. I will be directly affected by the proposed wastewater disposal system.

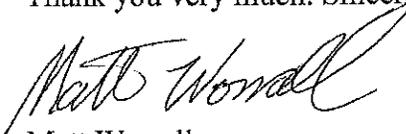
I am opposed to the proposed development for the following reasons:

- Developer proposes to discharge 450,000 gallons of treated effluent per day on a hilly, thinly soiled area above a tributary of Little Barton Creek. It is inevitable that this will contribute substantially to pollution of the Little Barton Springs segment of the Edwards Aquifer. I believe the amount of effluent will need to be reduced to avoid pollution of the creek and aquifer. I am downstream (Southeast) of the planned development and South of Little Barton Creek.
- The wastewater plant's pollutant removal parameters are not adequate to preclude pollution of Little Barton Creek. What is the plan when we have heavy rainfall in the area? Eventually we will be blessed with more rain. What precautions/guarantees does their proposed wastewater system provide?
- The large-scale wastewater treatment plant will create odors and noise pollution which will affect my future home and acreage.
- Furthermore, I'm concerned that my well will be contaminated.

Second, I request that there be a public meeting concerning this application.

Third, please put me on the mailing list for all information related to this project. **My mailing address is 214 Settlers Valley Drive, Pflugerville TX 78660.**

Thank you very much. Sincerely,



Matt Worrall  
7005 Destiny Hills Drive  
Austin, TX 78738

512-413-5567 Cell  
1-866-571-8311 Fax

REVIEWED

MAR 26 2014

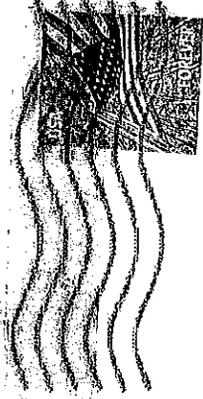
By



pm

CrW

  
CPT Robert M. Worrall  
214 Settlers Valley Dr  
Pflugerville, TX 78660-4751



AUSTIN TX 78701  
FPO GRANDE DISTRICT  
24 MAR 2014 PM 2 L

RECEIVED

MAR 25 2014

TCEQ MAIL CENTER  
MM

Office of the Chief Clerk  
MC 105, TCEQ  
P.O. Box 13087  
Austin TX 78711-3087

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 MAR 25 AM 9:57

CHIEF CLERKS OFFICE

78711308787

