

# Request for Contested Case Hearing

## Permit # WQ0015314001

MWD  
9/6/05

I, Hector Amaya, resident at, husband to owner Sabrina Houser and employee of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001

I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons.

A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Vineyard Operations

- a) Increased waste water discharge into the Edwards Aquifer Contributory and Recharge Zones
- b) Result in eutrophication -- an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen
  - i) Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production
  - ii) We routinely sample our soil to ensure that the proper nutrients and their levels are present.
  - iii) Disruption in water source increases need for alternative fertilizer treatments which leech into the water source.

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2015 OCT 12 PM 3:10  
CHIEF PLANNING OFFICER

B) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

- 1) Increased the likelihood of *E-Coli* in the water supply which is used in irrigation of a food product and for public drinking water for our customers and employees in our business
- 2) The winery is required by the Comal County Health Department to test our water for E-Coli
  - a) Upon positive results, the winery will be shut down immediately until it's source is identified and remedied.
  - b) A shut-down due to this identified E-Coli contamination will essentially put us out of business because by the onus is placed on Dry Comal Creek Vineyards to identify the source and rectify it. To do so will utilize capital monies that serve to keep the business running. Even a short-term closure will annihilate our ability to continue doing business.

REVIEWED

OCT 12 2015

BY [Signature]

C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421,

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

**How can pathogens enter my water? TCEQ RG-421**

*Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff.*

MWD

# Request for Contested Case Hearing

## Permit # WQ0015314001

**How can I protect my water system from contamination?** TCEQ RG-421

- Properly maintain all water facilities.
- Obtain a sanitary easement for each well.
- Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn)
- Install backflow preventers.
- Maintain a minimum pressure of 35 psi at all points within the distribution system.
- Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines.

D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool).

### Result Impacts Perennial Pool

- a) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen.

***The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review. by David L. Correll \****

### ***Abstract***

*Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton.*

In summary, there remains a number of adverse affects that this Waste Water Treatment Plan will impose on downstream residents and businesses that have not been taken into consideration. Despite the fact that the permit request and supporting documentation 'meet' the intent of the regulations; TCEQ rapacious permitting process which maintains that the permittee will follow all building and monitoring requirements and that there is minimal or no long term effects is 'blue sky' thinking. While TCEQ may view my concerns as 'the sky is falling', I maintain that it's not a matter of 'if' but 'when' the sky will fall on this WWTP.

While it's clear in my brief interactions with TCEQ and attendance of contested case hearings whereby the opinions of the ALJ and OPIC were wholesale disregarded and that the TCEQ will do nothing but continue to allow this WWTP permit to continue, I implore TCEQ to consider the points presented above and properly address them such that the TCEQ increases the WWTP requirements to ensure minimal degradation to the Dry

# Request for Contested Case Hearing Permit # WQ0015314001

Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage.

Respectfully submitted:

Hector Amaya

cc:

Comal County Commissioners

Donna Eccleston, Commissioner Precinct 1

Scott Haag, Commissioner, Precinct 2

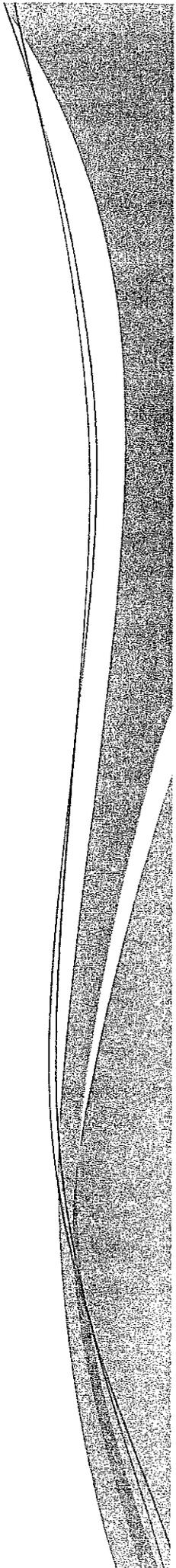
Kevin Webb, Commissioner Precinct 3

Jen Crownover, Commissioner, Precinct 4

Representative Doug Miller

Legislator Donna Campbell





**Exhibit 2**  
**Dry Comal Creek**

# West Fork Dry Comal Creek Watershed

## Proposed Treatment Plant

## Dry Comal Creek Vineyard

Normal condition

Wet condition



**Legend**

USGS Streamflow

- 100 cfs
- 200 cfs
- 300 cfs
- 400 cfs
- 500 cfs
- 600 cfs
- 700 cfs
- 800 cfs
- 900 cfs
- 1000 cfs

FEMA FIRM 03  
1% Flood Zone (100 year)

**Aviation Zones**

- Aviation Zone
- Aviation Zone
- Aviation Zone

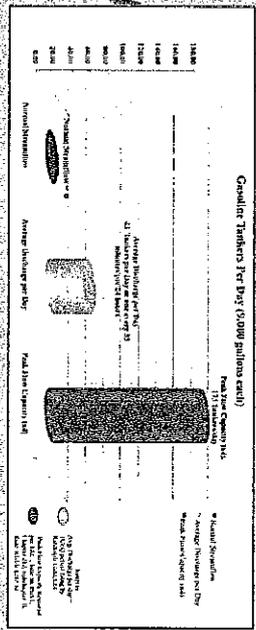
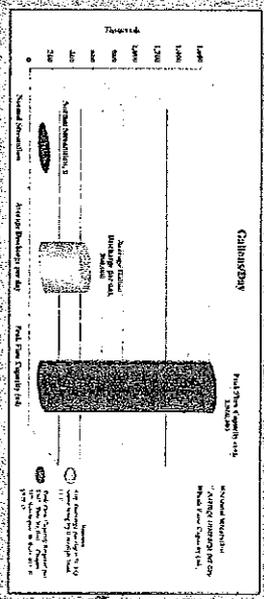
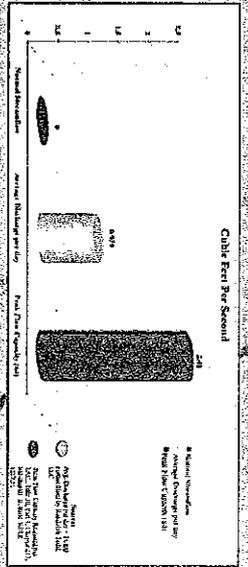
USGS Streamflow



# West Fork Dry Comal Creek - Comal Creek Watershed

## Where would all the wastewater go?

Proposed Wastewater Treatment Plant



**Legend**

USGS Stream Flow

- 1-100
- 101-1000
- 1001-10000
- 10000+

**Watersheds TWDB**

Watershed Development Level: 2000's

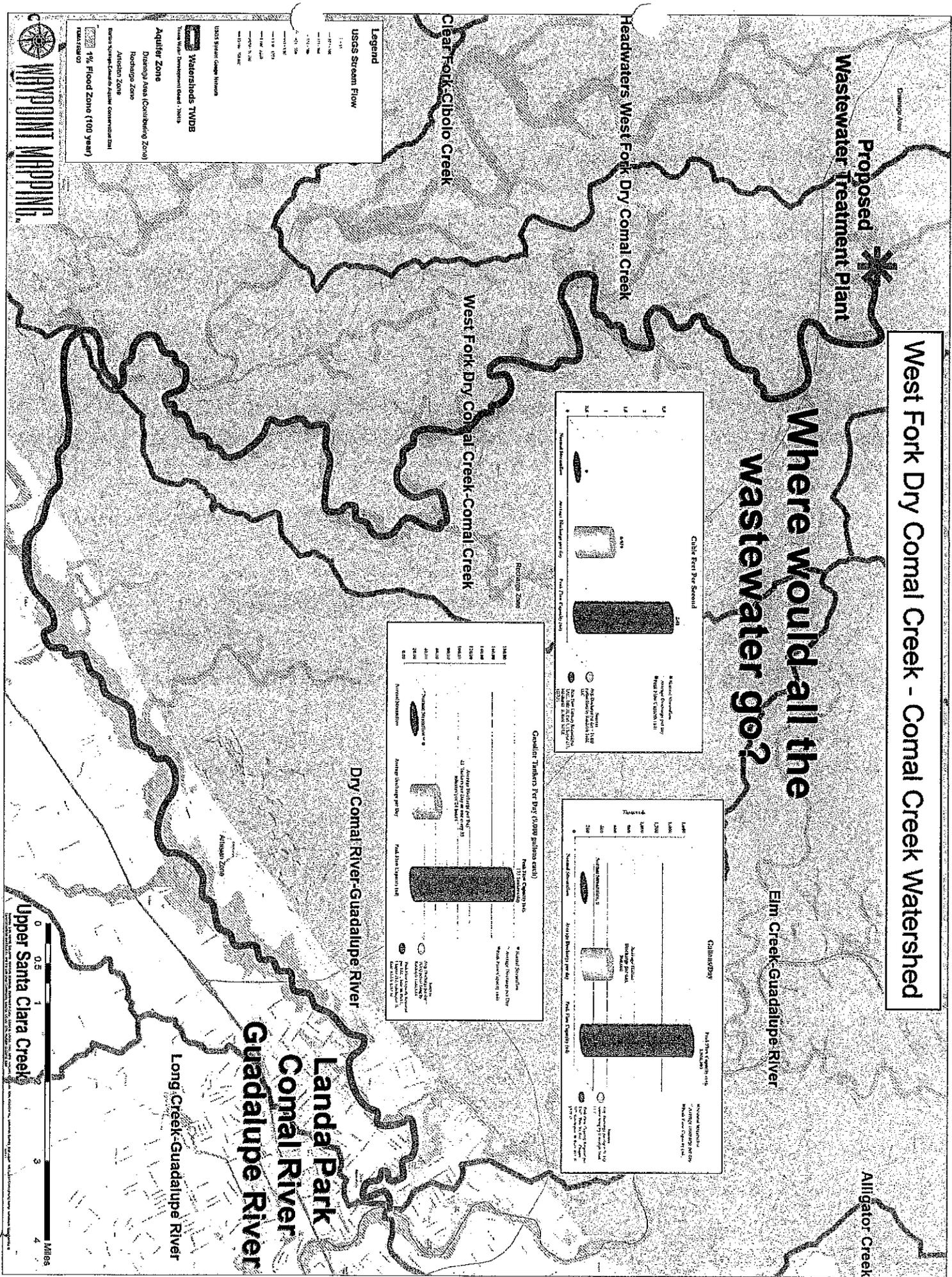
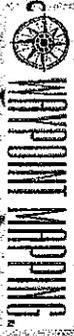
**Aquifer Zone**

- Draught Area (Overlying Zone)
- Recharge Zone
- Artisan Zone

Barren Springs, Comal de Arriba, Comal de Abajo

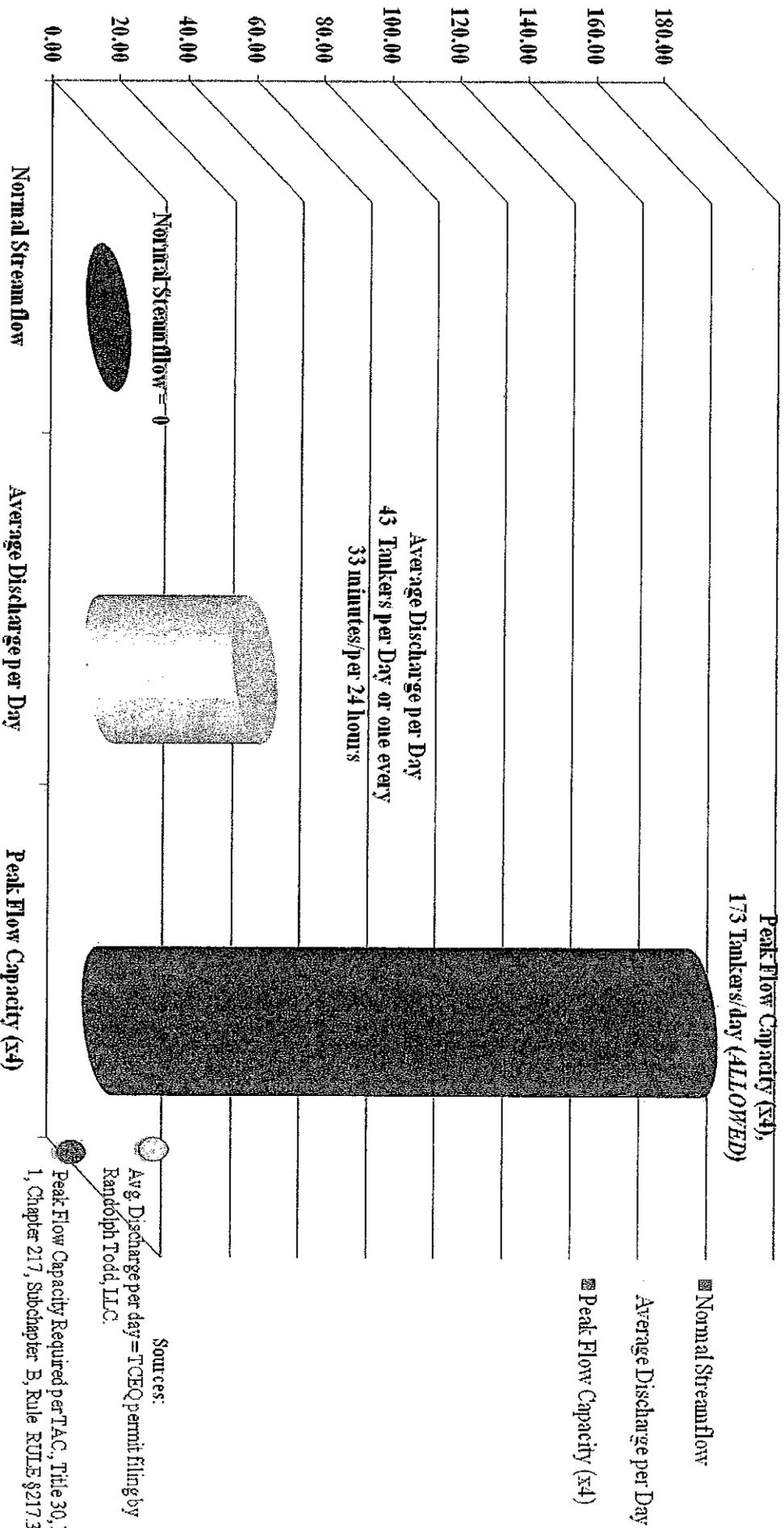
**1% Flood Zone (100 year)**

TEXAS 2008 03



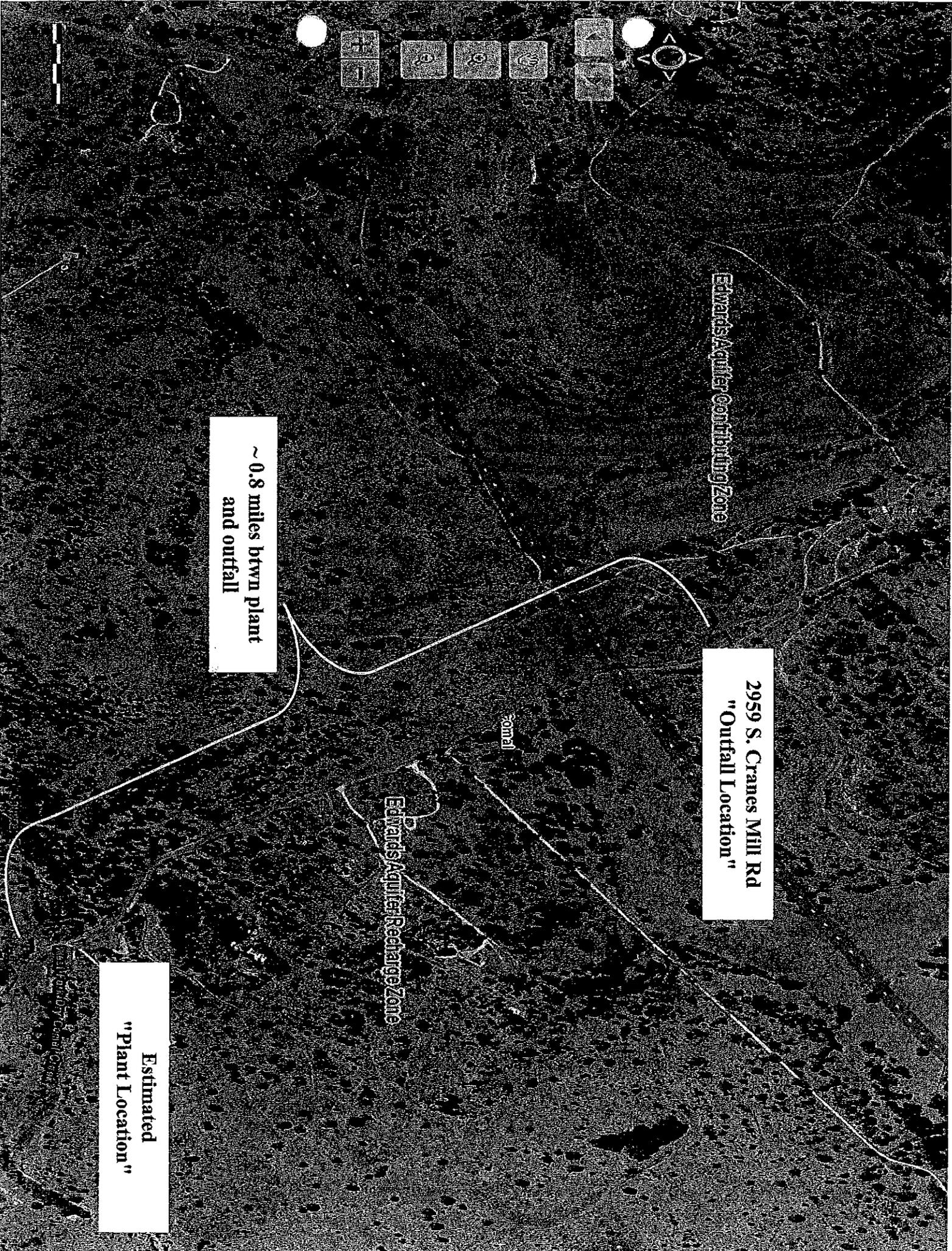
# TCEQ. It's Your Duty to Protect The State's Public Health and Natural Resources

Gasoline Tankers Per Day (9,000 gallons each)



Source:  
 Avg Discharge per day = TCEQ permit filing by  
 Randolph Todd, LLC.

Peak Flow Capacity Required per TAC, Title 30, Part  
 1, Chapter 217, Subchapter B, Rule RULE §217.32



Edwards Aquifer Contributing Zone

2959 S. Cranes Mill Rd  
"Outfall Location"

~ 0.8 miles btwn plant  
and outfall

canal

Edwards Aquifer Recharge Zone

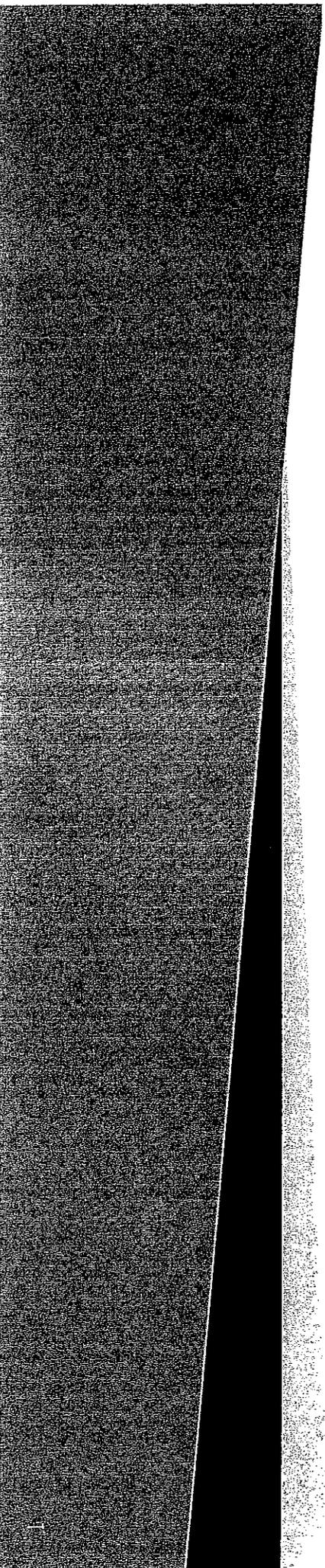
Estimated  
"Plant Location"

Map of Edwards Aquifer Contributing Zone and Recharge Zone

# Exhibit 3

## Dry Comal Creek

and Dry Comal Creek Vineyards



# Dry Comal Creek

## ▶ Perennial Pond

- Aquatic Life
- Water for Cattle
- Water for Wildlife
- Sits atop of Recharge Zone from which our wells tap into water for irrigating crops and provides drinking water for personal and business uses



# The USGS Store

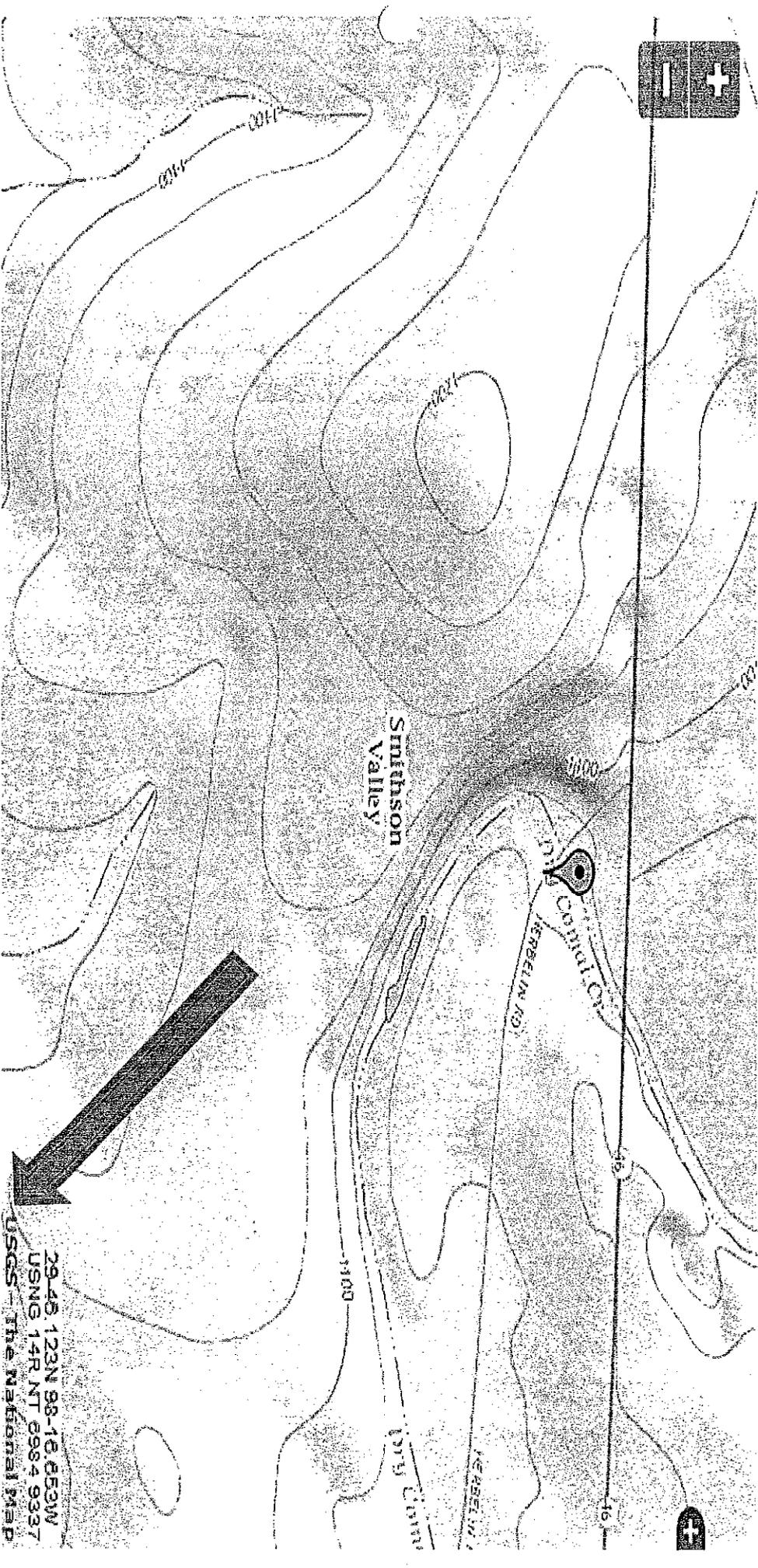
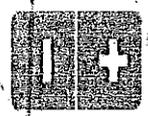
<< Back To Store About: [USGS Maps](#) : [Geopdf Maps](#) : [US Topo Maps](#) : [Historical Topographic Maps](#)

## Map Locator & Downloader

Explore Historical Topo Map Viewer

Don't see the Map Locator & Downloader? [Help](#) | Having trouble? Call: 1-888-ASK-USGS (1-888-275-8747, select

Search:



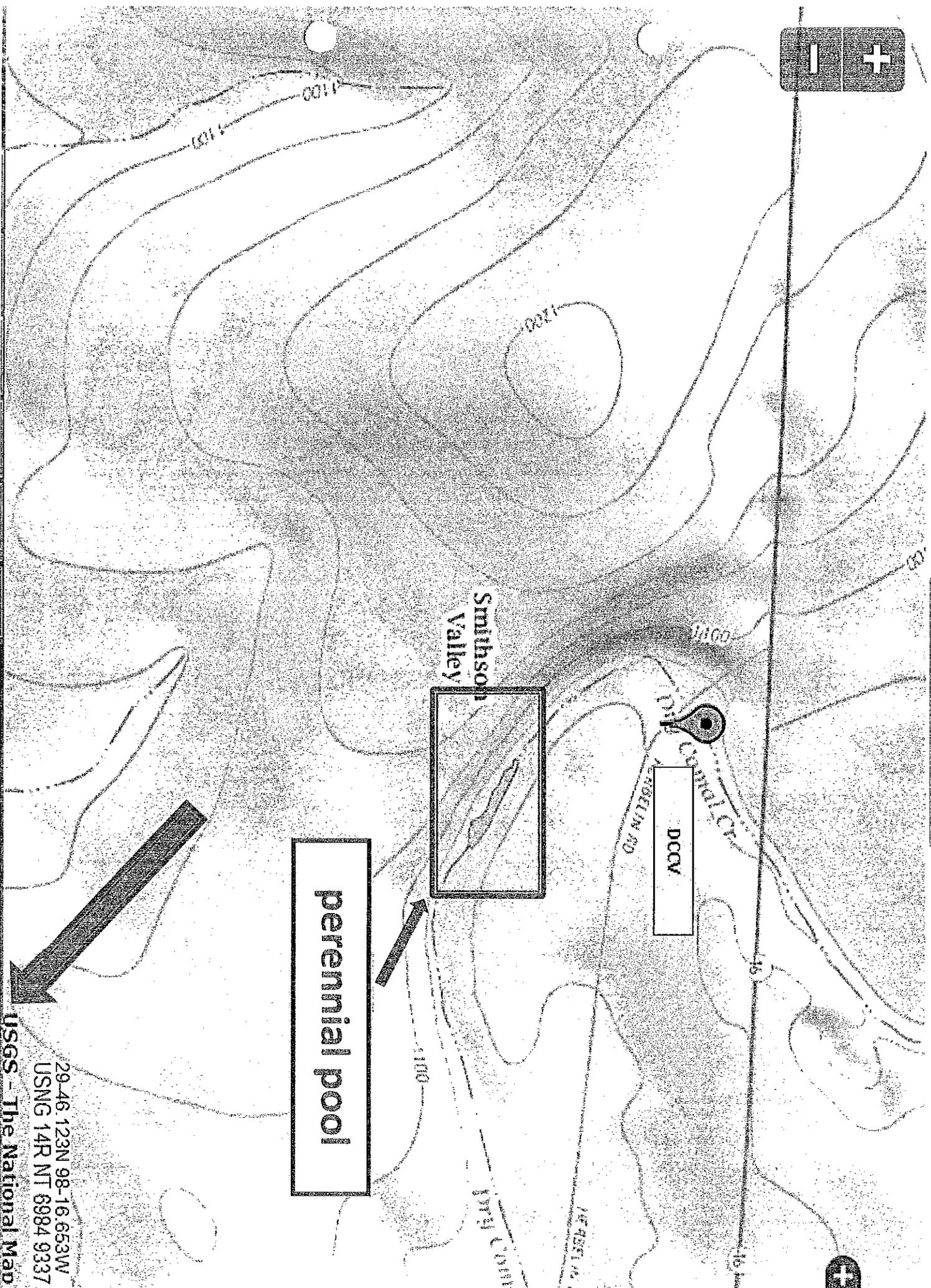
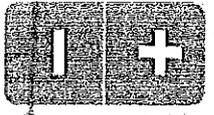
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USNG 14R NT 6984 9337  
USGS - The National Map

Search: 1741 herblin rd, new braunfels

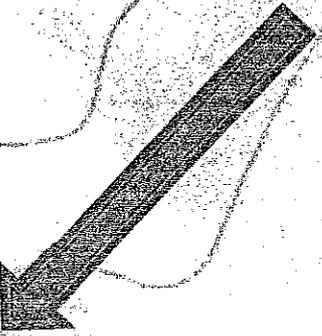
Address or place

Go

Search Help



perennial pool



# Valley View

108 Highway 46 West

1088 Ave

1100

## Gravel Pit

West low water crossing

Edwards Aquifer Recharge Zone

water wells

DCCV

Herbelin Rd.

## perennial pool

East end of property line low water crossing



1:50,000 3/2017

Search bar

Zoom To Scale: Select a scale: v

Map navigation icons: Home, Measure, Bookmarks, Layers, Legend, Print, Refresh

West low water crossing



Highway 46 West

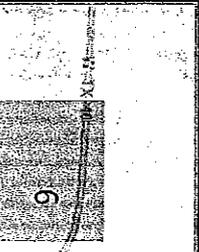
Herbelin Rd.

DCCV

Edwards Aquifer Recharge Zone

perennial pool

East end of property line & low water crossing

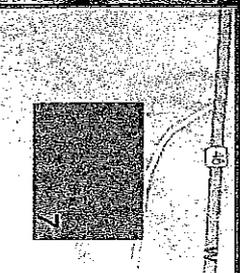




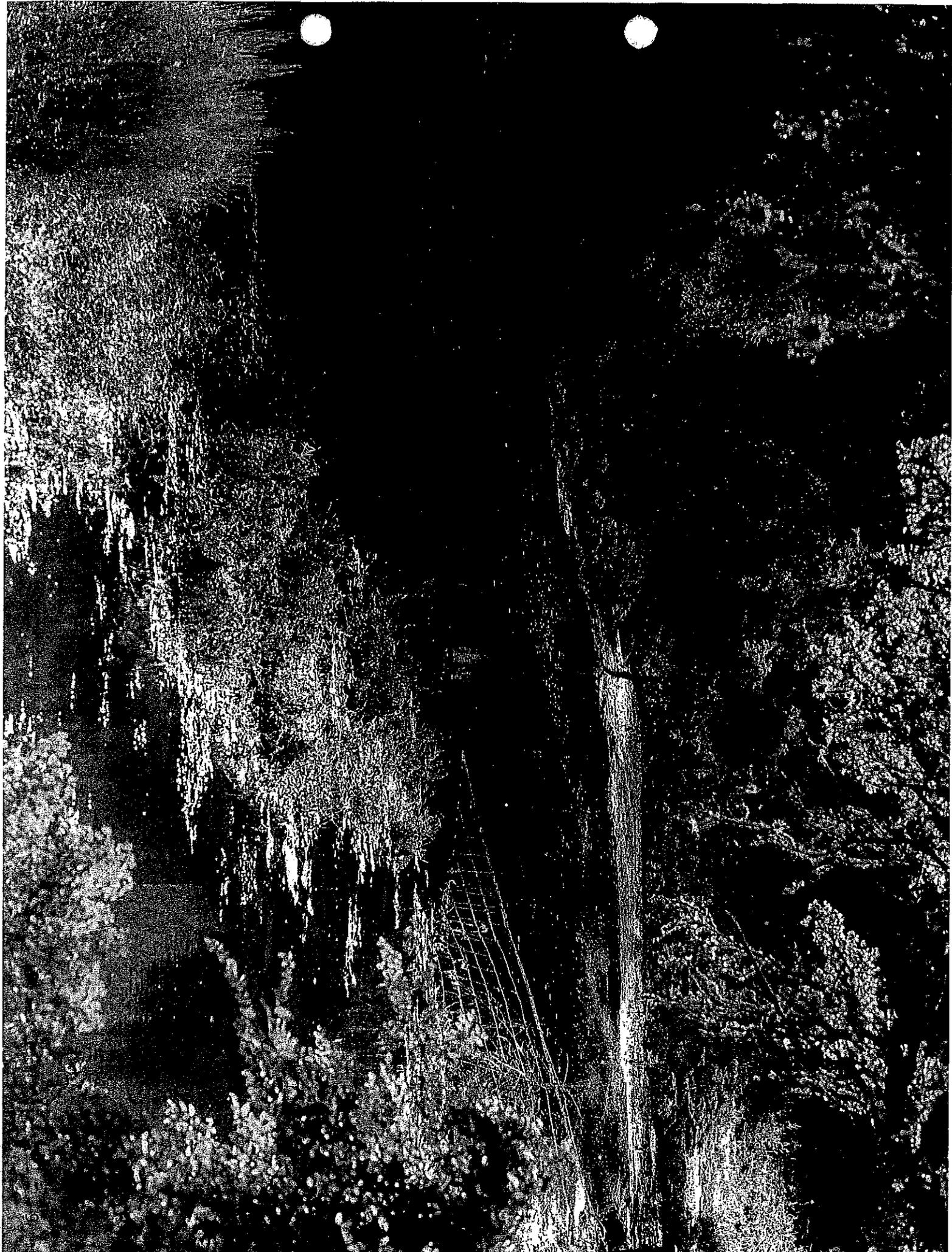
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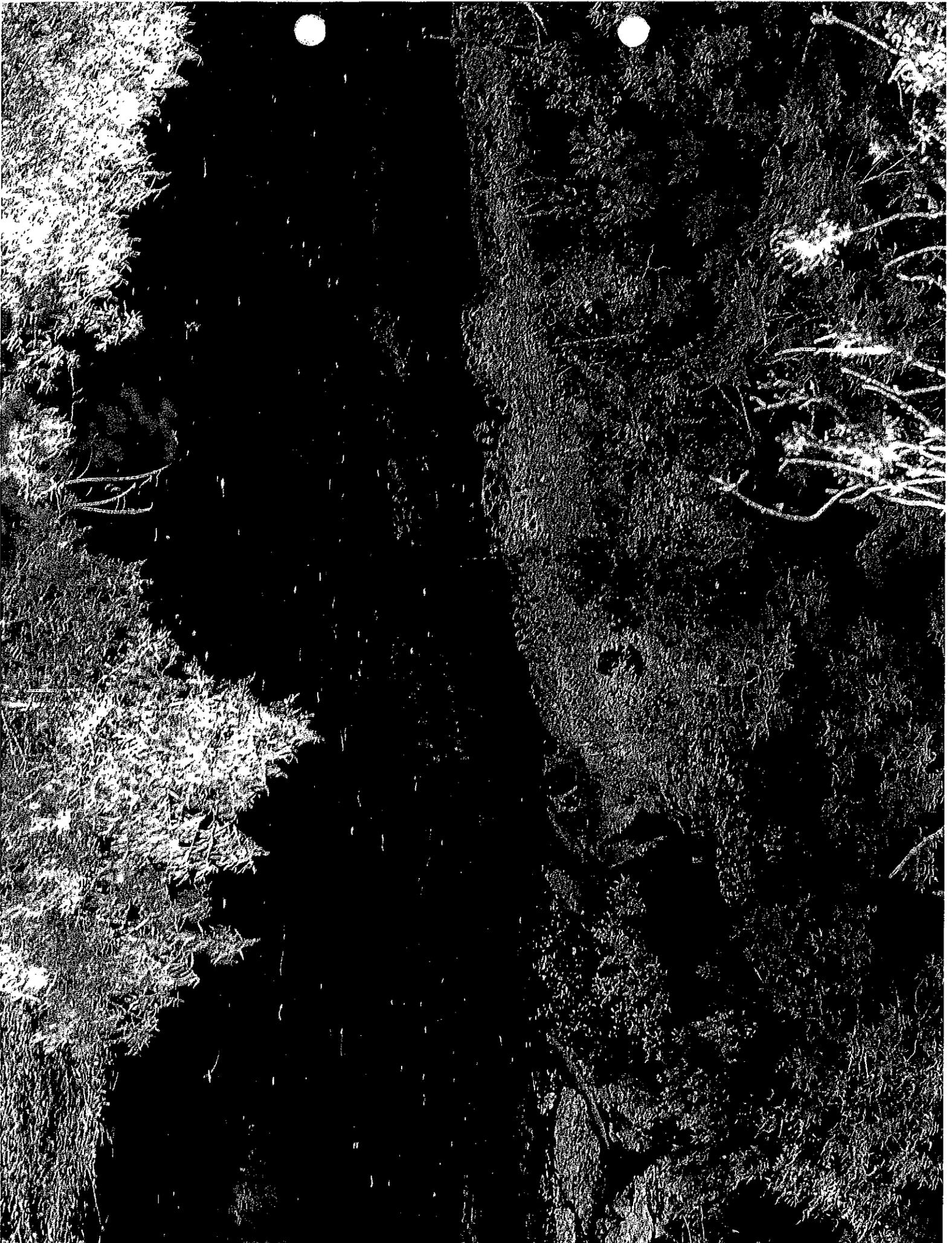
perennial pool

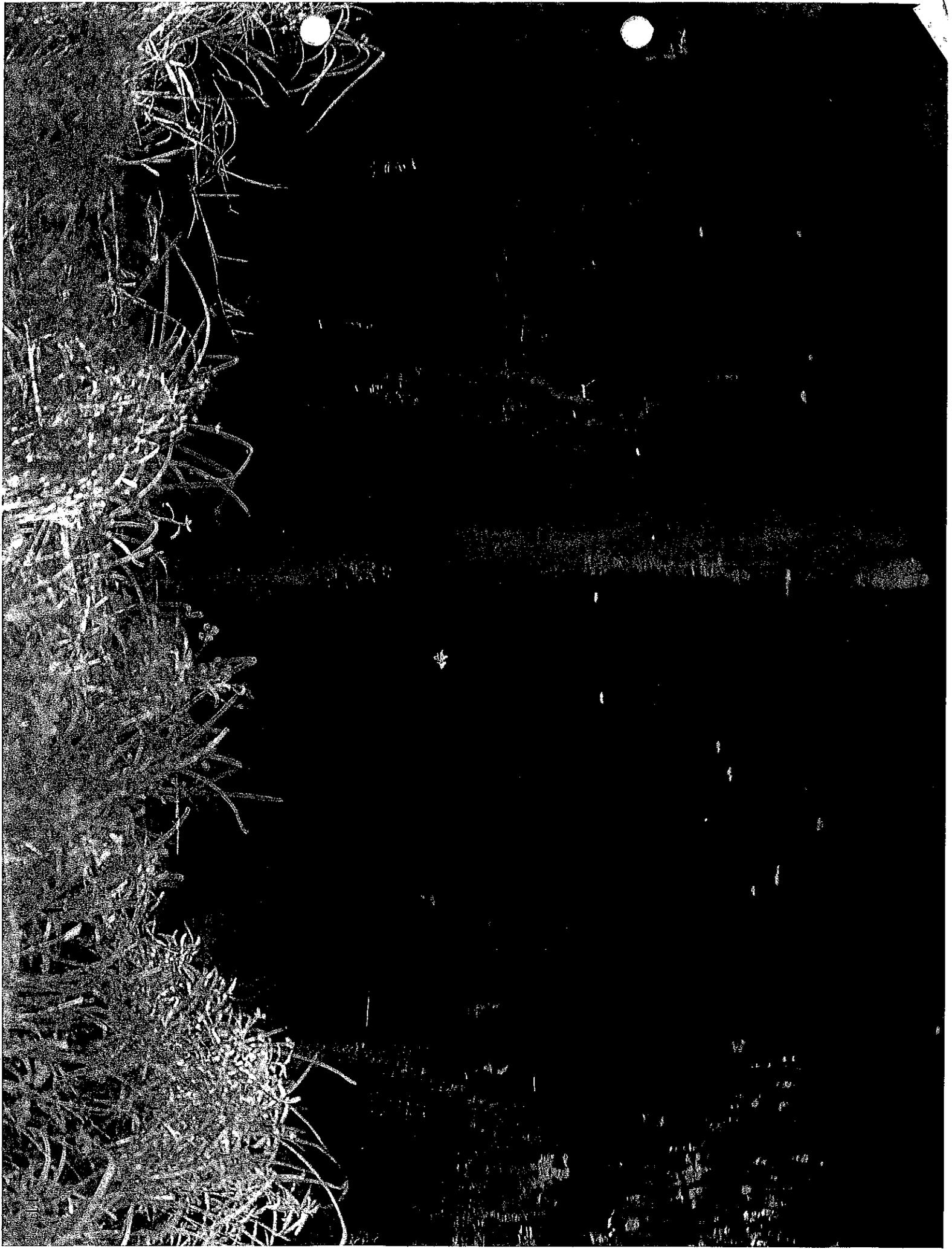
no dry canal creek



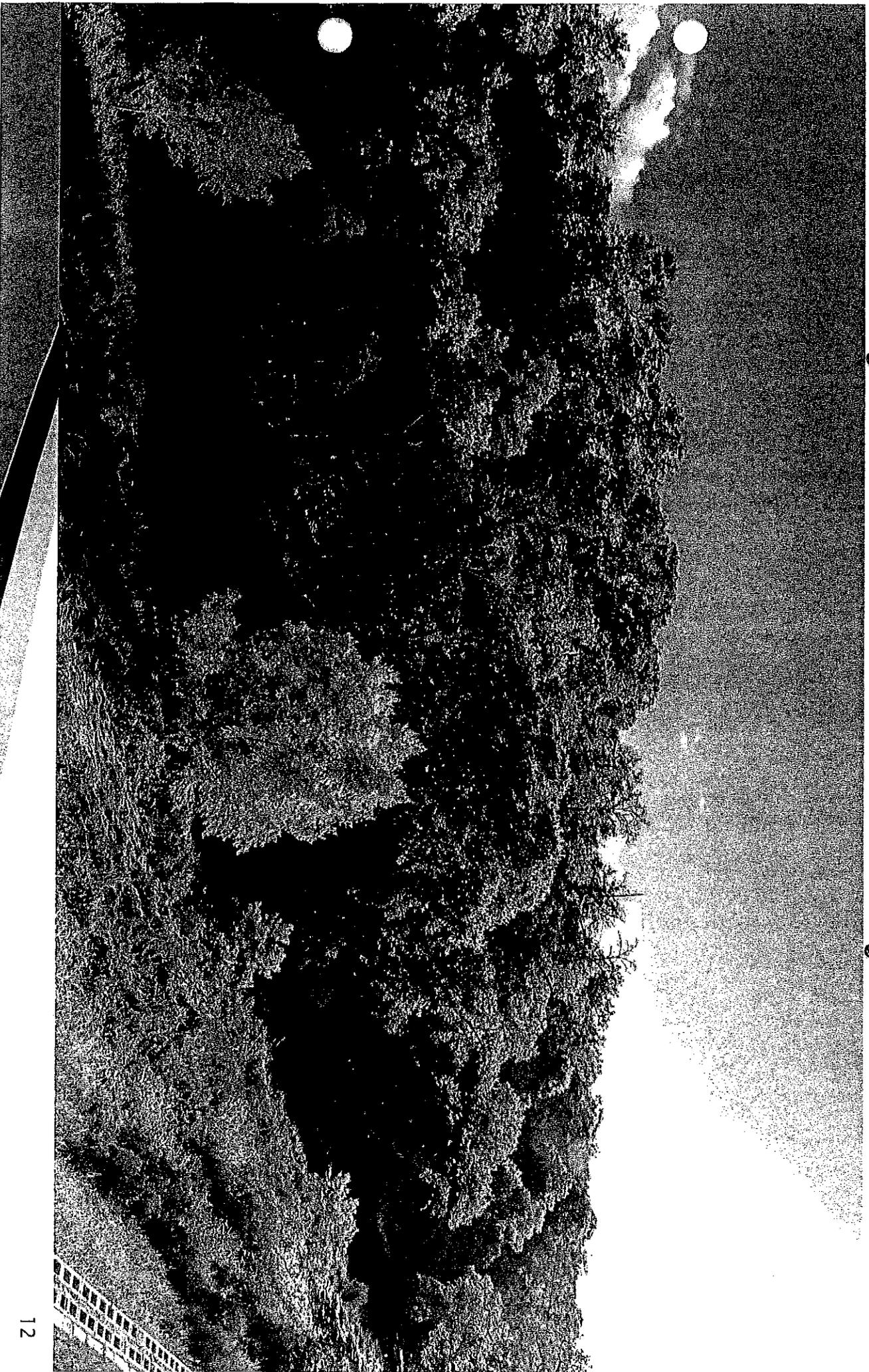


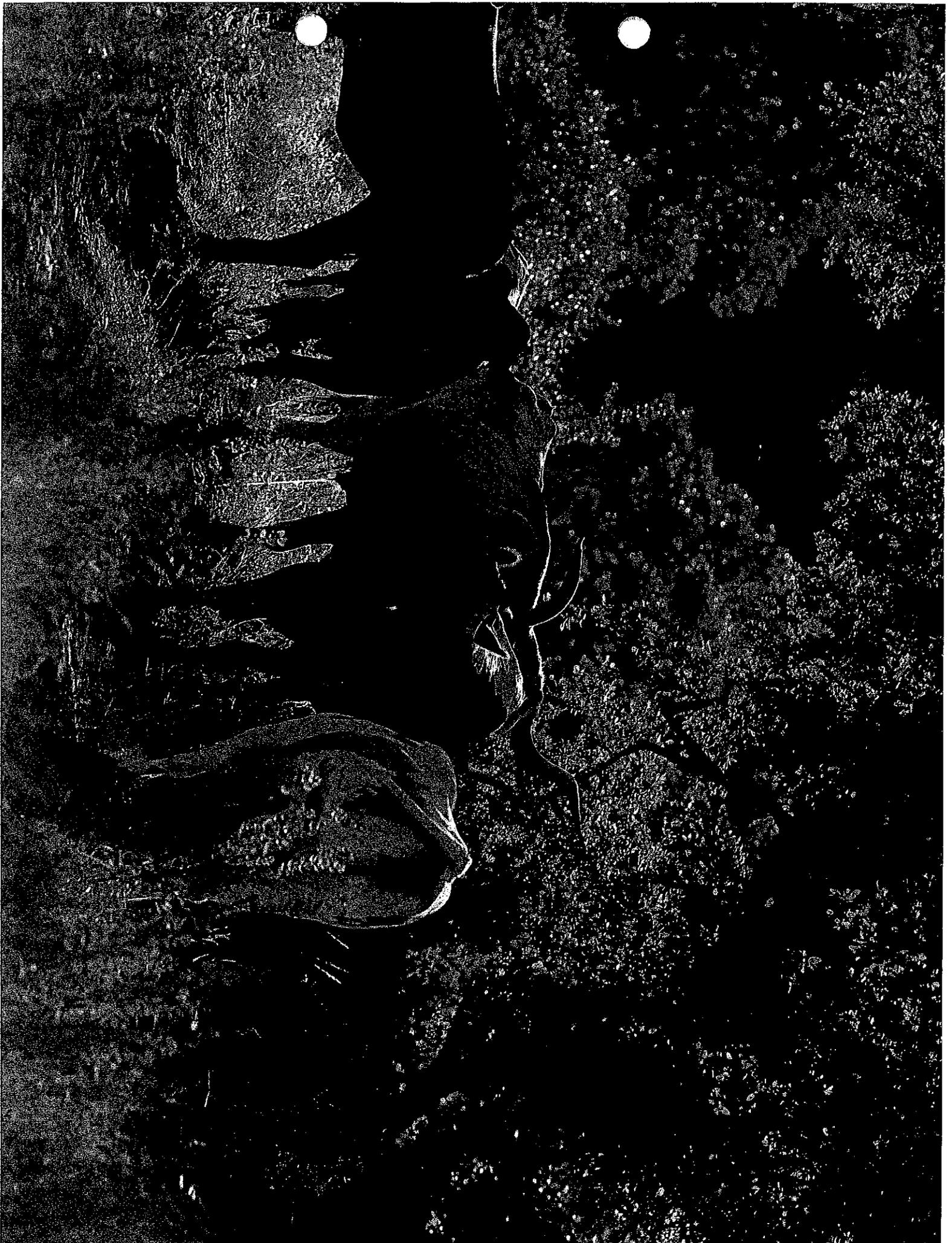


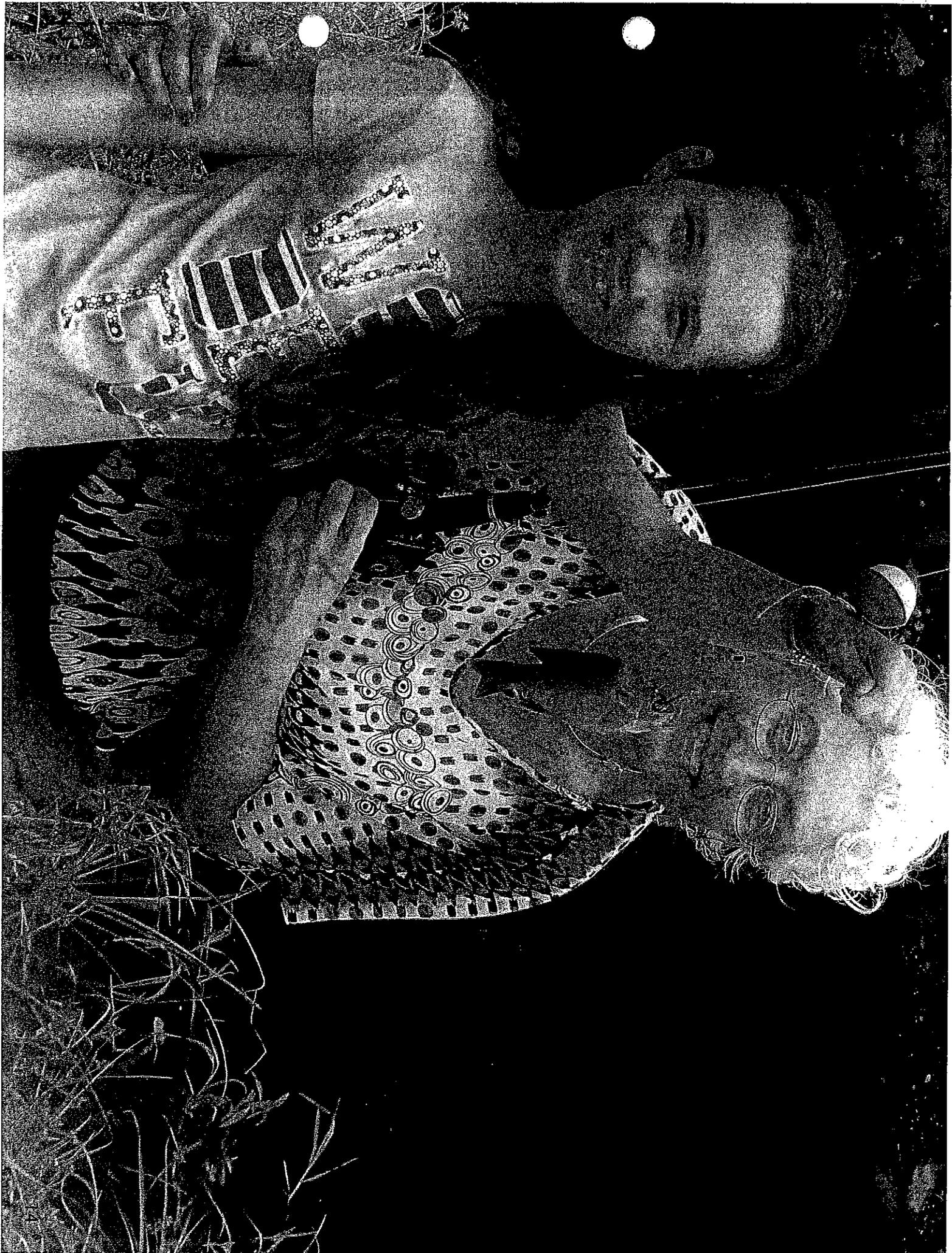




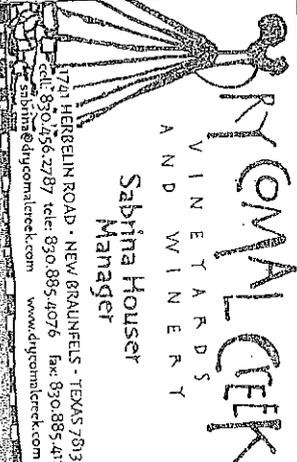
# Panoramic View of Dry Comal Creek @ Dry Comal Creek Vineyards







Dry Comal Creek Vineyards and Winery  
Sabrina Houser Amaya  
1741 Herbelin Rd.  
New Braunfels, TX 78132



**DRY COMAL CREEK**  
VINEYARDS  
AND WINERY  
Sabrina Houser  
Manager

1741 HERBELIN ROAD • NEW BRAUNFELS • TEXAS 78132  
cell: 830.456.2787 tele: 830.885.4076 fax: 830.885.4124  
sabrina@drycomalcreek.com www.drycomalcreek.com

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2015 OCT 12 PM 3:38

CHIEF CLERK'S OFFICE

Office of the Chief Clerk TCEQ  
12100 Park 35 Circle, Bldg F  
Austin, TX 78753

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:17 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** hxamaya@gmail.com [mailto:hxamaya@gmail.com]  
**Sent:** Sunday, October 11, 2015 8:07 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** Hector X Amaya

**E-MAIL:** [hxamaya@gmail.com](mailto:hxamaya@gmail.com)

**COMPANY:** Dry Comal Creek Vineyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8304562760

**FAX:**

**COMMENTS:** I, Hector Amaya, resident at and employee of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001 I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons. A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant

*Mu*

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Even a short-term closure will annihilate our ability to continue doing business. C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421, Result Impacts Public Water Supply and Ability for Business to Remain in Business How can pathogens enter my water? TCEQ RG-421 Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff. How can I protect my water system from contamination? TCEQ RG-421 • Properly maintain all water facilities. • Obtain a sanitary easement for each well. • Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn) • Install backflow preventers. • Maintain a minimum pressure of 35 psi at all points within the distribution system. • Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines. D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool). Result Impacts Perennial Pool a) Result in eutrophication – an excess of nutrients (i.e., Phosphorous), producing an increase in microorganisms and algae and depression in oxygen. The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review. by David L. Correll \* Abstract Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it

is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton. In summary, there remains a number of adverse affects that this Waste Water Treatment Plan will impose on downstream residents and businesses that have not been taken into consideration. Despite the fact that the permit request and supporting documentation 'meet' the intent of the regulations; TCEQ rapacious permitting process which maintains that the permittee will follow all building and monitoring requirements and that there is minimal or no long term effects is 'blue sky' thinking. While TCEQ may view my concerns as 'the sky is falling', I maintain that it's not a matter of 'if' but 'when' the sky will fall on this WWTP. While it's clear in my brief interactions with TCEQ and attendance of contested case hearings whereby the opinions of the ALJ and OPIC were wholesale disregarded and that the TCEQ will do nothing but continue to allow this WWTP permit to continue, I implore TCEQ to consider the points presented above and properly address them such that the TCEQ increases the WWTP requirements to ensure minimal degradation to the Dry Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage. Respectfully submitted:  
Hector Amaya (because my files are too large, a complete contested case letter with exhibits will be delivered)  
cc: Comal County Commissioners Donna Eccleston, Commissioner Precinct 1 Scott Haag, Commissioner, Precinct 2 Kevin Webb, Commissioner Precinct 3 Jen Crownover, Commissioner, Precinct 4 Representative Doug Miller Legislator Donna Campbell

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 27, 2015 8:21 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [hxamaya@gmail.com](mailto:hxamaya@gmail.com) [mailto:[hxamaya@gmail.com](mailto:hxamaya@gmail.com)]  
**Sent:** Sunday, April 26, 2015 8:45 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Hector Amaya

**E-MAIL:** [hxamaya@gmail.com](mailto:hxamaya@gmail.com)

**COMPANY:** Dry Comal Creek Vinyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8304562760

**FAX:** 8308854076

**COMMENTS:** I respectfully request that TCEQ allow a 'public meeting' of this proposed waste water treatment plant. It has already been determined that the formation of a WCID is not necessary, and therefore this petition to continue is not necessary. I also request to be added to the mailing list of when notices about this permit request are sent out. I live less than a mile from this petitioner's request to put in a waste water treatment plant and I was NOT notified of this petition.

*MW*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, July 01, 2015 8:25 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [luckystar@gvtc.com](mailto:luckystar@gvtc.com) [mailto:[luckystar@gvtc.com](mailto:luckystar@gvtc.com)]  
**Sent:** Tuesday, June 30, 2015 5:44 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/16/05/16*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Teresa Barnhill

**E-MAIL:** [luckystar@gvtc.com](mailto:luckystar@gvtc.com)

**COMPANY:**

**ADDRESS:** 143 DRY BEAR CRK  
NEW BRAUNFELS TX 78132-1665

**PHONE:** 8598024625

**FAX:**

**COMMENTS:** I respectfully request a contested case hearing on permit WQ0015314001. I am concerned about the impact a waste water treatment facility will have in the area requested. The Edwards Aquifer needs to be protected as well as the endangered species in the proposed effluent water discharge flow.

*MWD*

**Melissa Schmidt**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, February 20, 2015 12:54 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [luckystar@gvtc.com](mailto:luckystar@gvtc.com) [<mailto:luckystar@gvtc.com>]  
**Sent:** Friday, February 20, 2015 11:28 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

MWD  
96056

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Teressa Barnhill

**E-MAIL:** [luckystar@gvtc.com](mailto:luckystar@gvtc.com)

**COMPANY:**

**ADDRESS:** 143 DRY BEAR CRK  
NEW BRAUNFELS TX 78132-1665

**PHONE:** 8598024625

**FAX:**

**COMMENTS:** I would like to ask for a PUBLIC HEARING regarding the permit filed to build a Sewage Treatment Facility that is expected to discharge approximately 390,000 gallons of treated sewage into Dry Comal Creek off S. Cranes Mill Rd in New Braunfels, TX. I am concerned about its possible effects on the Edwards Aquifer, which is underneath of this proposed development area. The Edwards Aquifer and land that is above it is an environmentally sensitive area with caves, natural springs and abundant wildlife. The system

ms

being proposed in the application is nothing more than a few commercial "S.obic" systems chained together with filters and chlorination. The daily spillover of a Sewage treatment plant discharging into the creek and flowing onto property owners land and then into the Comal River would have ramifications that effect health as well as the environment. There are also flooding concerns. The Dry Comal Creek traverses through a 100 year flood plain and is subject to several flash floods per year. I believe an environmental study is warranted to understand the effects of the proposed Sewage Treatment Facility on the Edwards Aquifer and surrounding environment to understand if such a development is feasible as proposed.

TCEQ Public Meeting Form  
June 18, 2015

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Teressa Barnhill

Mailing Address: 143 Dry Bear Creek New Braunfels  
78132

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

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

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

Email: luckystar@gvtc.com ✓

Phone Number: 859-802-4625

• 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

RECEIVED

JUN 18 2015

AT PUBLIC MEETING

PLS submit written comment:

I am against the approval of  
a waste water treatment plant off  
S. Cranes Mill Rd.

I am concerned about the environmental  
impact on Dry Comal Creek, the Edwards  
Aquifer Recharge Zone and affect on  
surrounding well water.

There are numerous caves with  
surface openings that water bleeds  
into the bedrock. There are caves  
and other environmentally sensitive  
environments that can be affected by  
effluent water.

I am concerned about the livestock  
and animals that could be impacted.  
There are endangered species in the

path of the proposed waste water plant.

Thank you for denying this permit  
Teresa Bamhill

I am alarmed by the amount of errors  
on the permit. I would like this to be  
investigated and the permit rejected.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 09, 2015 8:53 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [jbarucky@satx.rr.com](mailto:jbarucky@satx.rr.com) [mailto:[jbarucky@satx.rr.com](mailto:jbarucky@satx.rr.com)]  
**Sent:** Thursday, February 05, 2015 11:45 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/6 05/16*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** DR. Jerry Barucky

**E-MAIL:** [jbarucky@satx.rr.com](mailto:jbarucky@satx.rr.com)

**COMPANY:**

**ADDRESS:** 20806 WOODLAND CV  
GARDEN RIDGE TX 78266-2775

**PHONE:** 2106514909

**FAX:**

**COMMENTS:** We are greatly concerned that the hybrid aerobic waste system proposed for the Meyer Ranch Water Control and Improvement District sewer plant is insufficient to properly treat effluent and protect area homeowners from noxious odors and possible well contamination. We request that TCEQ hold a public hearing and get testimony on this from area citizens and treatment experts.

*mm*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:19 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com) [mailto:[john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)]  
**Sent:** Saturday, October 10, 2015 3:50 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** John Blodgett

**E-MAIL:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)

**COMPANY:** Detex Corporation

**ADDRESS:** 2345 APPELLATION  
NEW BRAUNFELS TX 78132-2775

**PHONE:** 2104103226

**FAX:**

**COMMENTS:** I request a contested public hearing. I live 1.5 to 1.75 miles from this proposed facility. I will be directly affected by this waste dumping facility because I will be subjected to the stench and undiluted waste water which will flow directly into my subdivision, Vintage Oaks.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, June 30, 2015 8:29 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com) [mailto:[john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)]  
**Sent:** Monday, June 29, 2015 8:08 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
960510*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** John Blodgett

**E-MAIL:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)

**COMPANY:**

**ADDRESS:** 2345 APPELLATION  
NEW BRAUNFELS TX 78132-2775

**PHONE:** 2104103226

**FAX:** 2104103226

**COMMENTS:** I request a contested case hearing on this permit application. I live approximately 1.5 miles from the proposed sewage processing facility and probably less to the pipes that will be pumping the effluent 3 miles though the Meyers Ranch. I am an affected citizen because with high rains, pipe problems, sludge pumping, or a range of other problems this facility could have it will smell like a sewage dump out here on a regular basis.

*MWD*

2

TCEQ Public Meeting Form  
June 18, 2015

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: John Blodgett

Mailing Address: 2345 Application

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

City/State: New Braunfels TX Zip: 78132

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

Email: John.h.blodgett@gmail.com ✓

Phone Number: 210 4103228

• 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.

*Handwritten signature/initials*

My name is John Blodgett I live in Vintage Oaks probably three quarters of a mile from the proposed Sewage Disposal facility.

I would hope that an evaluation be done by an independent 3<sup>rd</sup> party to confirm that the amount of treated effluent, BEING DUMPED DIRECTLY INTO THE W FDC CREEK, is not going to endanger that <sup>environmental</sup> environment over the recharge zone. It should be understood, on a best and worse-case scenario, how far that effluent is going to go down that dry creek and what long-term effects it could have.

And how are the rains we have out here going to effect the flow of effluent or maybe worst, flood the sewage system itself.

A couple of weekends ago it rained 3 1/2 inches out there on my 2 + acres of property in Vintage Oaks and it was a torrential flood. It completely washed the bottom of my creek bed out. That water moved rocks that I couldn't move back they were so heavy. At least 500 pounds of rock got washed down out of the creek. 2<sup>nd</sup> time.

The proposed facility we are talking about today can average 390,000 gallons **DIRECTLY INTO THE WF DC CREEK - NO DISPERSION FIELD.** On any given day it could be less, or 3 to 4 times worse which would be a torrential flood concentrated into a small dumping area – now if you add varying amounts of rain, it could be a torrential flood on an average day and whatever is worse than that on a high day.

That effluent won't just evaporate, it will move in large volume right across and down into the recharge zone. And when it evaporates, it leaves the trace contaminants behind to accumulate including by-products of everything that the residents there consume – metabolized drugs, hormones, and no telling what else.

As noted in the permit, there are endangered species that live in the types of caves right there.

It needs to be confirmed, through some <sup>environmental</sup> independent evaluation, environmental and property rights of the residents down the W Fork of the Dry Comal Creek are protected.

I really appreciate your listening thank you.

RECEIVED  
JUN 18 2015  
AT PUBLIC MEETING

MW

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, April 29, 2015 12:51 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com) [mailto:[john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)]  
**Sent:** Wednesday, April 29, 2015 10:48 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** John Blodgett

**E-MAIL:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)

**COMPANY:** Detex Corporation

**ADDRESS:** 2345 APPELLATION  
NEW BRAUNFELS TX 78132-2775

**PHONE:** 2104103226

**FAX:**

**COMMENTS:** Dear Sirs, I request a public meeting on the Meyer Ranch Development because it will directly affect my property values by allowing hundreds of thousand of gallons of waste effluent to be dumped adjacent and almost immediately into the Dry Comal Creek which will subsequently flow through the lower part of my subdivision (Vintage Oaks) and potential, during a flood, all the way down to Land Park. This trend of concentrated developments (3 to 5 houses per acre) is disastrous on 2 fronts; first, there isn't enough of the

*MWD*

drought-stress aquifer water to support these developments over the long-term and second, the waste water will be dumped right near and into the recharge zone which will effect many property owners in Comal Count but has the potential to effect millions of Texans who don't live in Comal County, but rely on clean water from the aquifer. Please deny this permit. Sincerely, John Blodgett, Resident of Vintage Oaks.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, February 05, 2015 8:05 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com) [mailto:[john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)]  
**Sent:** Wednesday, February 04, 2015 6:31 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96054*

**REGULATED ENTITY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** John Blodgett

**E-MAIL:** [john.h.blodgett@gmail.com](mailto:john.h.blodgett@gmail.com)

**COMPANY:**

**ADDRESS:** 2345 APPELLATION  
NEW BRAUNFELS TX 78132-2775

**PHONE:** 2104103226

**FAX:**

**COMMENTS:** Dear TCEQ, My name is John Blodgett and I have been a resident at Vintage Oaks since 2011. I have some concerns about the Meyers Ranch Project's short and long term plans on the development of this pristine Texas Hill Country out here around Cranes Mill Road and the Dry Comal Creek, and its effect on the St. Edwards Aquifer and those downstream on the Dry Comal Creek, including the town of New Braunfels. I support reasonable, planned development I am the President of Detex Corporation which is one of New

*MWD*

Braunfels thriving, profitable and growing manufacturing concerns – we have been a strong contributor and community participant in New Braunfels since 1981 – I’ve been with Detex since 1986. I only give you this background to assure you I am a business man and community advocate. In my early bioscience (Microbiology) training at the University of Texas at Arlington we took a field trip to the huge waste water processing plant there in near the Trinity River. We observed the whole process and saw how the natural gas generated by the waste was used to power some of the operation. Last but not least we saw the effluent released into a tributary that I believe ultimately flowed into the Trinity River. The difference up there is that “highly processed” gray water was going into an active river where the effluent was immediately diluted and further acted upon by the aquatic bacteria there. The Dry Comal Creek is “DRY” almost all of the time. With a normally dry creek, there won’t be the resources for effective biodegradation of the waste. As you know, this is a St. Edwards Aquifer Recharge Zone! These developers haven’t done their homework/don’t know understand what they are proposing – I’ve heard this is also proven by the errors in their permit application. They there will be 1,500 home squeezed into that small area and the plant will be dumping 390,000 gallons of waste water. That’s 260 gallons per house per day! I wonder how they came up with that number. It will make a non-sustainable sewage dump out of the pristine Dry Comal Creek and the St. Edwards Aquifer – which will have an effect in and beyond Comal County. This could adversely everyone that relies on the St. Edwards Aquifer for clean water as well as the property owners all down the Dry Comal Creek to Landa Park. Please, we really need to stop this poorly conceived plan before allowing it to happen. The property tax the county stands to gain by this development will be countered by decreasing property values though this entire region.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:17 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** SSA – TCEQ Oct 20155.pdf

*MWD  
96056*

H

**From:** [tbrand@ssamarketing.com](mailto:tbrand@ssamarketing.com) [<mailto:tbrand@ssamarketing.com>]  
**Sent:** Sunday, October 11, 2015 9:06 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Troy Calvin Brand + Patricia L. Brand

**E-MAIL:** [tbrand@ssamarketing.com](mailto:tbrand@ssamarketing.com)

**COMPANY:** SSA Marketing

**ADDRESS:** 1980 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1630

**PHONE:** 2108654562

**FAX:**

**COMMENTS:** Please see attached letter. I filed yesterday, but failed to attach the letter then. Doing so now.  
thanks.

*MWD*

Date: October 10, 2015

From: Troy and Patricia Brand  
1980 S. Cranes Mill Road  
New Braunfels, TX 78132

To: Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Subj: **TPDES permit number WQ0015314001**

Dear Honorable Commissioners:

This is to request for a Contested Case Hearing for the permit to discharge waste water under provisions of Section 402 of the Clean Water Act and Chapter 26 of the Texas Water Code. The reference TPDES permit number is 0015314001 and EPA I.D. Number TX0135976.

My wife, Patricia, and I are residents of South Cranes Mill Road. We have been landowners here since 1994, have built our retirement home on our pristine hill country property, and we intend to protect it. Our property is adjacent to the Dry Comal Creek where it crosses South Cranes Mill Road. When natural or the frequent heavy rains create additional water flow in the Dry Comal Creek, this crossing is often flooded, sometimes causing traffic to be re-routed. This is the same crossing that will carry the outflow of the proposed plant.

We have continually accepted our role as dedicated stewards of this land, its wildlife, the precious water below and the oxygen yielding vegetation for more than 20 years. We cannot stop caring about the future of our precious land now.

We are very concerned with a proposal covered by the subject TPDES permit, which would allow construction of the Meyer Ranch Waste Water Treatment Facility to process human waste from a proposed 1500 new homes to be crowded onto 700 acres. The following thoughts are provided for your consideration about this proposal and should serve as reasons to deny this permit.

(1) As with all our neighbors, we rely on clean, healthy water from our wells. Collectively, it is our responsibility to protect the purity of this water for ourselves, and for our children and grandchildren who follow. The protection of our water from effluent wastewater that may flow from the proposed plant is - at this point - our collective responsibility.

(2) Partially treated water wastewater will be dumped into the Dry Comal Creek at the rate of an untold thousands of gallons per day. In times of weather disaster, mechanical malfunction or even negligence, it is not inconceivable that raw sewage from the plant may overflow into there as well. We believe we must do all we can to preclude the construction of this plant and the development of this travesty.

2) Dry Comal Creek is directly over the Edwards Aquifer recharge zone. When we drilled a second well after our the water source from our first well was overtaxed by new residents, we paid an additional \$1,000 to photograph every inch of the new well's walls to certify it would not allow contamination of the Aquifer. We accepted that as necessary and responsible, because we are the stewards this land and partially responsible for its future. Now, it is an issue once again, and we feel we must be heard.

3) The stringent requirements of certification that a water well will not contaminate the Edwards Aquifer raises a question: Why would anybody allow the possibly of treated wastewater – or possibly raw effluent – to perk down through the recharge zone on its way to the Edwards Aquifer?

(4) The concentration of 1500 homes on 700 acres is an affront to our natural habitat. It is very clear the issue of handling human waste from an estimated 5,000 additional residents is the most important issue at hand. This over-concentration is a precursor to future disaster for current residents, current wildlife, plants and trees, and all those in other areas who rely on the Edwards.

(5) On our land and all that surrounds it, there are caves where runoff water begins its route through limestone filtering on its way to join other underground waters as a pure resource for all. In times of flooding and possible release of raw sewage and accompanying contaminates onto Dry Comal Creek find their way into our caves? Will this contamination exist on a larger scale?

(6) It is also not inconceivable that shutdown of the treatment plant and resulting overflow of human waste will occur. Natural disasters, totally out of our control, are sure to happen. This will likely cause flooding of Dry Comal Creek and closure of South Cranes Mill Road for an untold period. This can be avoided by disapproving the permit in question.

(7) South Cranes Mill Road has, up to this point, been a quiet and rather beautiful drive through the hill country. Adding the element of 1500 homes and truck traffic hauling their solid waste from the plant will add significant additional traffic to our road.

(8) The results of "progress" have already been experienced on South Cranes Mill Road recently as large trucks have used the road to reach new developments instead of using their primary Highway 46 entrances. Comal County is currently patching and re-surfacing the road to repair damage caused by this heavy, relentless (often

speeding) truck traffic. With the addition of this plant and the normal servicing of 1500 homes, we are sure to have even more heavy truck and other vehicle traffic, road damage, increased accidents and resulting County expense.

(9) And, the list goes on.

In conclusion, we respectfully request a Contested Case Hearing on this issue. We are counting on the favorable decision by TCEQ regarding this very important ecological issue.

Thanks for your attention.



TROY L. BRAND  
Landowner



PATRICIA L. BRAND  
Landowner

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:19 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** TCEQ LETTER Oct 2015.pdf

H

**From:** [pbrand@ssagraphics.com](mailto:pbrand@ssagraphics.com) [mailto:pbrand@ssagraphics.com]  
**Sent:** Saturday, October 10, 2015 11:33 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/10/15*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Patricia L. Brand + Troy C. Brand

**E-MAIL:** [pbrand@ssagraphics.com](mailto:pbrand@ssagraphics.com)

**COMPANY:**

**ADDRESS:** 1980 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1630

**PHONE:** 2108654561

**FAX:**

**COMMENTS:** We may have failed to attach our letter. re-submitted.

*MWD*

Date: October 10, 2015

From: Troy and Patricia Brand  
1980 S. Cranes Mill Road  
New Braunfels, TX 78132

To: Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Subj: **TPDES permit number WQ0015314001**

Dear Honorable Commissioners:

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(4) The concentration of 1500 homes on 700 acres is an affront to our natural habitat. It is very clear the issue of handling human waste from an estimated 5,000 additional residents is the most important issue at hand. This over-concentration is a precursor to future disaster for current residents, current wildlife, plants and trees, and all those in other areas who rely on the Edwards.

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speeding) truck traffic. With the addition of this plant and the normal servicing of 1500 homes, we are sure to have even more heavy truck and other vehicle traffic, road damage, increased accidents and resulting County expense.

(9) And, the list goes on.

In conclusion, we respectfully request a Contested Case Hearing on this issue. We are counting on the favorable decision by TCEQ regarding this very important ecological issue.

Thanks for your attention.



TROY L. BRAND  
Landowner



PATRICIA L. BRAND  
Landowner

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 04, 2015 8:44 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** [pbrand@ssagraphics.com](mailto:pbrand@ssagraphics.com) [<mailto:pbrand@ssagraphics.com>]  
**Sent:** Tuesday, February 03, 2015 6:37 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
92056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Patricia Brand

**E-MAIL:** [pbrand@ssagraphics.com](mailto:pbrand@ssagraphics.com)

**COMPANY:**

**ADDRESS:** 1980 S CRANES MILL RD [pbrand@ssagraphics.com](mailto:pbrand@ssagraphics.com)  
NEW BRAUNFELS TX 78132-1630

**PHONE:** 2108654561

**FAX:**

**COMMENTS:** I am a landowner on S. Cranes Mill Rd. New Braunfels Tx. and I feel that a water treatment plant built on the proposed land near here would not be conducive to enhancing this neighborhood. The Dry Comal Creek that is proposed for the dumping of the treated water, runs over the road in at least one point and is indeed a dry creek, only holding water when we have a deluge of rain. Also the trucking involved in transporting the sludge would be a deterrent to the area as it is a small narrow road which only accommodates

*PM*



people who live here and school buses. A proposed school will also increase traffic which is already at a high level.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:19 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

*mwd  
9/6/05ce*

**From:** [tbrand@ssagraphics.com](mailto:tbrand@ssagraphics.com) [mailto:[tbrand@ssagraphics.com](mailto:tbrand@ssagraphics.com)]  
**Sent:** Saturday, October 10, 2015 11:21 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Troy C. Brand

**E-MAIL:** [tbrand@ssagraphics.com](mailto:tbrand@ssagraphics.com)

**COMPANY:**

**ADDRESS:** 1980 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1630

**PHONE:** 2108654562

**FAX:**

**COMMENTS:** Pleas see attached letter.

*MW*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 04, 2015 8:44 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** tbrand@ssagraphics.com [mailto:tbrand@ssagraphics.com]  
**Sent:** Tuesday, February 03, 2015 7:54 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
90056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME: MR TROY CALVIN BRAND**

**E-MAIL: [tbrand@ssagraphics.com](mailto:tbrand@ssagraphics.com)**

**COMPANY:**

**ADDRESS: 1980 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1630**

**PHONE: 2108654562**

**FAX:**

**COMMENTS:** February 3, 2015 To Whom It May Concern: My name is Troy Brand, retired Air Force officer, husband for 51 years to the same wife, father of three and grandfather of 12. After retiring from 22 years of service to my Country in 1984, my wife and I decided to buy property in the country as an investment in our future and security for our future retirement, which would come 25 or so years later. We purchased part of the Meyer Ranch in 1995 as this investment and moved onto our 65 acres of beautiful Live Oak laden hill country

*MWD*

in 1996. We finally built our dream home in 1999 and have settled in for the duration. Now – with very little warning and with a lot of “shock and awe” – we learn that a new development of homes has been approved and will be built right across South Cranes Mill road from our property entrance on the formerly-quiet and peaceful South Cranes Mill Road. And, believe it or not, we just heard that it was approved by somebody in government to build 1500 homes on only 600 acres, many of them over the Edwards Aquifer recharge zone, which we and all our neighbors have so diligently protected for the last 20 years. Considering roads and utilities and common areas on this new development, this means it is going to vastly overtax and burden the land in our neighborhood to the tune of one home every quarter acre. If there will actually be 1500 homes in this development, the load is not just fresh ground water that will be pulled from the aquifer, tremendous traffic loads for South Cranes Mill Road, or the oxygen bearing trees that will be sacrificed. There will be tons of human waste generated by 1500 families, probably at an average of 3 to 5 members in each home. All of this waste is supposed to be handled and “purified” in a new waste water plan planned to support the community. That plant is expected to expel 390,000 gallons PER DAY of gray water into our Dry Comal Creek that is adjacent to our land and that of our neighbors. Other estimates of the “treated” waste water is twice that number of gallons. Question: what elements will be in that “treated water” as it finds its way to our properties and what are the health aspects of that for humans, animals and of course the Edwards Aquifer? We also all question whether this will be safe and whether accidents or disasters – including power outages as an example – will effect the ability of this plant to actually purify the waste enough to keep it from poisoning our land in times of annual deluges that occur. We have seen two “100 year” floods and one that was even dubbed a “500 year flood” in these past 20 years, which suggests that flooding will not be rare in the future. What happens when this plant is overrun by ground waters or flood waters and effluent is pushed down the Dry Comal Creek into our property and that of others close by? According to one report, the contractor who is to build this structure has never built a plant large enough to handle this kind of load. I may be wrong, but this sounds very much like a perfect storm brewing in our neighborhood. Some of the other things to consider when deciding to approve this permit are these: • South Cranes Mill Road is a narrow country road, bordered by large Oaks. It can't be widened without sacrificing many 50 and 100 year old large Live Oak trees shading our quiet road. This will present future traffic issues. • When heavy trucks begin hauling sludge from this plant, will they go north or south for their exit? Whichever way they go, expect them to go fast. These haulers will likely be paid by the load, and any speed they can get away will be worth the risk of a ticket. Our South Cranes Mill Road will become a very dangerous place to drive. • With such a large community as that proposed, a school will surely be added. Students traveling the South Cranes Mill Road will be in jeopardy caused by these sludge haulers. Expect accidents and deaths because of this plant and its support system. • We already are experiencing nearly out of control gravel and materials trucks going up and down our once-quiet South Cranes Mill Road. I know, because I photograph them and plan to continue to do so until I can get them to use another route to whatever their current destination is. And, to revert back to my first paragraph, what about our property values? What about our retirement investment? And, what about the environmental impact of overpopulating our land, without cause, for other than tax revenues and who knows what other benefits that may have been promised. I respectfully asked that each voting member, or any individual who can bring reason to bear on the approval or disapproval of this permit, read my comments and those of my neighbors with an open mind. Please ask yourself if this is the right thing to do in this particular spot in South Texas. As one of the members of this small community of landowners, I ask that you deny permit. Thank you for your attention, Sincerely, Troy Brand 1980 S. Cranes Mill Road New Braunfels, TX 78132 210-865-4562

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, June 30, 2015 8:24 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [iamsue@gvtc.com](mailto:iamsue@gvtc.com) [<mailto:iamsue@gvtc.com>]  
**Sent:** Monday, June 29, 2015 6:01 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
94056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Nelda S Davis

**E-MAIL:** [iamsue@gvtc.com](mailto:iamsue@gvtc.com)

**COMPANY:**

**ADDRESS:** 1789 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1615

**PHONE:** 8308852800

**FAX:**

**COMMENTS:** I want a contested case hearing. I don't want a waste water treatment plant over the Edwards Aquifer on South Cranes Mill Rd. It will also be detrimental to our water wells.

*MWD*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 04, 2015 11:01 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [iamsue@gvtc.com](mailto:iamsue@gvtc.com) [<mailto:iamsue@gvtc.com>]  
**Sent:** Wednesday, February 04, 2015 10:06 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Nelda S Davis

**E-MAIL:** [iamsue@gvtc.com](mailto:iamsue@gvtc.com)

**COMPANY:**

**ADDRESS:** 1789 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1615

**PHONE:** 8308852800

**FAX:**

**COMMENTS:** I desire a hearing on this matter as I don't agree with having a waste water plant dumping waste water into the Dry Comal Creek which will eventually go into the other rivers. I think it would ruin all of the water wells nearby. The area is so porous and has caves and it would eventually leech into our water wells. It is also going to go into the Edwards Aquifer since this is the recharge zone area.

*mwd*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, March 10, 2015 3:27 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [iamsue@gvvc.com](mailto:iamsue@gvvc.com) [<mailto:iamsue@gvvc.com>]  
**Sent:** Tuesday, March 10, 2015 2:50 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
960500*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Nelda S. Davis

**E-MAIL:** [iamsue@gvvc.com](mailto:iamsue@gvvc.com)

**COMPANY:**

**ADDRESS:** 1789 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1615

**PHONE:** 8308852800

**FAX:**

**COMMENTS:** I would like a public meeting concerning the WCID.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, June 30, 2015 8:24 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [edgeline@gvtc.com](mailto:edgeline@gvtc.com) [<mailto:edgeline@gvtc.com>]  
**Sent:** Monday, June 29, 2015 5:54 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Ronald R Davis

**E-MAIL:** [edgeline@gvtc.com](mailto:edgeline@gvtc.com)

**COMPANY:**

**ADDRESS:** 1789 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1615

**PHONE:** 8308852800

**FAX:**

**COMMENTS:** I have been following this for the last few months. I live on South Cranes Mill Rd. and am very concerned about my water well purity. We live on a limestone area with many faults and caves which very easily and likely would allow for fouling of wells through sewage effluent. We are also in the Edwards Aquifer Recharge Zone and this proposed wast-water treatment plant is a tragedy getting ready to happen. The effluent should not be allowed whatsoever over the recharge zone or near water wells. Never should anything other that

*AW*

Class A drinking water be released in this area. I believe it is a subterfuge for the developers to draw up a plan to pump the effluent from the recharge zone up a few thousand feet and release it on the contributory zone in order to mask what is really happening. Dumping waste-water on the recharge zone. I would like to ask for a contested case hearing.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 04, 2015 9:27 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [edgeline@gvtc.com](mailto:edgeline@gvtc.com) [mailto:[edgeline@gvtc.com](mailto:edgeline@gvtc.com)]  
**Sent:** Wednesday, February 04, 2015 9:09 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Ronald R Davis

**E-MAIL:** [edgeline@gvtc.com](mailto:edgeline@gvtc.com)

**COMPANY:**

**ADDRESS:** 1789 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1615

**PHONE:** 8308852800

**FAX:**

**COMMENTS:** I live at 1789 S Cranes Mill Rd and I am about 200 yards from the Dry Comal Creek. This dry creek is the proposed dumping area for the effluent generated by the proposed Wastewater Treatment Plant on the Meyer Ranch. This entire area is part of the Edwards Aquifer Recharge Zone. The entire area has fractures in the limestone and water or waste will seep into the Edwards Aquifer from the Dry Comal Creek. There are

*mwd*

numerous caves in this area that have been discovered while drilling our water wells. There are a number of caves that are part of the Dry Comal Creek. I would like a hearing on this matter.

4

TCEQ Public Meeting Form  
June 18, 2015

Randolph Kodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Ronald R DAVIS

Mailing Address: 1789 S. CRANES MILL RD

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

City/State: NEAR BRAUNFDS TX Zip: 78132

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

Email: EDGE LINE@GVTC.COM ✓

Phone Number: 830 885 2800

• 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

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, March 10, 2015 3:27 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [edgeline@gvtc.com](mailto:edgeline@gvtc.com) [mailto:[edgeline@gvtc.com](mailto:edgeline@gvtc.com)]  
**Sent:** Tuesday, March 10, 2015 2:52 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** Ronald R Davis

**E-MAIL:** [edgeline@gvtc.com](mailto:edgeline@gvtc.com)

**COMPANY:**

**ADDRESS:** 1789 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1615

**PHONE:** 8308852800

**FAX:**

**COMMENTS:** I would like a public meeting regarding this application.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:19 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [srdooley@gvtc.com](mailto:srdooley@gvtc.com) [<mailto:srdooley@gvtc.com>]  
**Sent:** Saturday, October 10, 2015 11:20 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/10/15*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Susan Dooley Logue

**E-MAIL:** [srdooley@gvtc.com](mailto:srdooley@gvtc.com)

**COMPANY:**

**ADDRESS:** 10120 W STATE HIGHWAY 46  
NEW BRAUNFELS TX 78132-1626

**PHONE:** 8302285659

**FAX:**

**COMMENTS:** I would like to request a contested hearing. My property adjoins the Meyer Ranch and the Dry Comal Creek extends through my property. I am very concerned about the runoff and contamination that will occur from this wastewater system and affluent discharge. I have one water well as my source of drinking water for my house and this will contaminate the aquifer that supplies my one and only water well. My cattle drink from the Dry Comal Creek and from my one and only water well; thus, they will also be drinking contaminated

*MWD*

water as well and that beef that is eaten from this livestock will also be contaminated. This has to be stopped. The environment has to be protected. Please do not allow this to happen. There is no justification for the damage to the environment that this will cause. Our limited supply of drinking water must and should be protected. This will affect everyone in Comal County, not just the adjoining property owners.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, February 05, 2015 8:04 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

*MWD  
940516*

H

**From:** [srdooley@gvtc.com](mailto:srdooley@gvtc.com) [mailto:[srdooley@gvtc.com](mailto:srdooley@gvtc.com)]  
**Sent:** Wednesday, February 04, 2015 7:22 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTITY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Susan R Dooley Logue

**E-MAIL:** [srdooley@gvtc.com](mailto:srdooley@gvtc.com)

**COMPANY:**

**ADDRESS:** 10120 W STATE HIGHWAY 46  
NEW BRAUNFELS TX 78132-1626

**PHONE:** 2103249219

**FAX:**

**COMMENTS:** I would like to request a public hearing for proposed permit No. WQ0015314001. My property adjoins Meyer Ranch. Dry Comal Creek extends through the mid-portion of my property before entering Frankie Meyer's ranch and the location of the sewer treatment plant will negatively affect my property environmentally due to the back wash and overflow into Dry Comal Creek, as well as detrimentally affect my land due to the obnoxious odors permeating the air and surrounding area. The sewer treatment plant would

*MWD*

adversely affect the value of my land as well as contaminate it. Larger concerns are for the Dry Comal Creek further down the line which feed into the Comal and Guadalupe Rivers. Meyer Ranch also intends to drill several large water wells, which cannot be allowed to happen as this would deplete the aquifer and dry up the existing surrounding smaller wells on neighboring properties.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 28, 2015 9:36 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [srdooley@gvtc.com](mailto:srdooley@gvtc.com) [mailto:[srdooley@gvtc.com](mailto:srdooley@gvtc.com)]  
**Sent:** Tuesday, April 28, 2015 9:26 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Susan Dooley Logue

**E-MAIL:** [srdooley@gvtc.com](mailto:srdooley@gvtc.com)

**COMPANY:**

**ADDRESS:** 10120 W STATE HIGHWAY 46  
NEW BRAUNFELS TX 78132-1626

**PHONE:** 8302285659

**FAX:**

**COMMENTS:** I am requesting a public meeting on the issue of Permit WQ0015314001.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 23, 2015 9:27 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [sdunlap@gvtc.com](mailto:sdunlap@gvtc.com) [<mailto:sdunlap@gvtc.com>]  
**Sent:** Saturday, February 21, 2015 6:03 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
94054*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** Susan L Dunlap

**E-MAIL:** [sdunlap@gvtc.com](mailto:sdunlap@gvtc.com)

**COMPANY:** Southwest English Setter Rescue

**ADDRESS:** 462 SAN MARCOS TRL  
NEW BRAUNFELS TX 78132-1653

**PHONE:** 2108656492

**FAX:**

**COMMENTS:** I am requesting a public hearing on this permit. We are on well water and there is impact to our health and welfare if this goes forward. If this permit is approved it would have a devastating impact on the established residences in this area. This really needs to go to a public hearing.

*MLW*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, October 13, 2015 8:43 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

*MWD  
9/10/16*

**From:** [farmerwc@gvtc.com](mailto:farmerwc@gvtc.com) [<mailto:farmerwc@gvtc.com>]  
**Sent:** Monday, October 12, 2015 6:13 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Carole Farmer

**E-MAIL:** [farmerwc@gvtc.com](mailto:farmerwc@gvtc.com)

**COMPANY:**

**ADDRESS:** 1600 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1651

**PHONE:** 2102191587

**FAX:**

**COMMENTS:** I request a contested case hearing. My husband and I object to the permitting of the sewer plant on Cranes Mill Rd. in Comal County. We object to the discharge of wastewater into or on the bed of the Dry Comal Creek. Our well and land are in the path of this so call safe discharge of water in the creek. I do not see how anyone can come in and discharge anything onto our property. We are scared for the safety of our animals, pets and family, children, and grandchildren that go into this area. The residue left behind will harm them, our

*MWD*

water and land. We are also concerned about the smell, insects and the possibility of spillage of raw sewerage from the plant. Also, there is no need for 1500 homes on little lots in this area. The land and area are rural over the Edwards and need to be protected for over population for the safety of the water supply to millions...not just a few. We are worried about our water, air and our health. We request that this permit be denied.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:18 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

*MWD  
94056*

**From:** [farmerwc@gvtc.com](mailto:farmerwc@gvtc.com) [<mailto:farmerwc@gvtc.com>]  
**Sent:** Saturday, October 10, 2015 7:38 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Carole Farmer

**E-MAIL:** [farmerwc@gvtc.com](mailto:farmerwc@gvtc.com)

**COMPANY:**

**ADDRESS:** 1600 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1651

**PHONE:** 2102191587

**FAX:**

**COMMENTS:** My husband and I object to the permitting of the sewer plant on Cranes Mill Rd. in Comal County. We object to the discharge of wastewater into or on the bed of the Dry Comal Creek. Our well and land are in the path of this so call safe discharge of water in the creek. I do not see how anyone can come in and discharge anything onto our property. We are scared for the safety of our animals, pets and family, children, and grandchildren that go into this area. The residue left behind will harm them, our water and land. We are also

*mm*

concerned about the smell, insects and the possibility of spillage of raw sewerage from the plant. Also, there is no need for 1500 homes on little lots in this area. The land and area are rural over the Edwards and need to be protected for over population for the safety of the water supply to millions...not just a few. We are worried about our water, air and our health. We request that this permit be denied.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, January 27, 2015 8:26 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** [farmerwc@gvtc.com](mailto:farmerwc@gvtc.com) [<mailto:farmerwc@gvtc.com>]  
**Sent:** Monday, January 26, 2015 2:58 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
92056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Carole Farmer

**E-MAIL:** [farmerwc@gvtc.com](mailto:farmerwc@gvtc.com)

**COMPANY:**

**ADDRESS:** 1600 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1651

**PHONE:** 2102191587

**FAX:**

**COMMENTS:** Our 8 acres of property has 450 feet of the Dry Comal Creek cutting our through our property. The proposed wastewater treatment plant will be about a half mile from our home. We also have the same cavern system under our property as the Harris's and had to have our well cased to go through the caverns to the aquifer. I am concerned about the water coming on to OUR property. We pay taxes on this 8 acres and have owned it for some 12 years. What right does anyone have to run wastewater onto our property or place anything

*MWD*

on our property? I am sorry, but the State of Texas needs to protect land owners from developers coming in and destroying our homesteads and property. This water on the 450 feet of our section of the dry creek bed will bring unwanted disease and unsafe areas on the dry creek. Keeping fences up and repaired is a large task for us and flooding will be even more detrimental to our land with all this daily discharge. The developers should not build more houses than the property they bought can support with a septic and wells. Greed and the lack of responsibility on their part should not cause harm to our private property down from their land. They should have to keep their wastewater on their property. Everyone that has property bordering the Dry Comal should be send the information on the permit, not just a few. Also, I am sure that people who have wells in the Edwards Aquifer would like to know that there might be a wastewater sewage plant dumping into the recharge zone. Has the Edwards Aquifer been notified of this proposal? Most of South Cranes Mill sits on top of the recharge zone. When we installed our aerobic system we could not even place our sprayers in the 500 year flood area near the creek and now you are proposing running sewer water down our beautiful and natural dry creek bed. I think not...Respectfully Submitted, Carole Farmer

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:20 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** Drillers Report\_0390.pdf

H

*mwd  
9/6/15*

**From:** edharris55@yahoo.com [mailto:edharris55@yahoo.com]  
**Sent:** Saturday, October 10, 2015 9:56 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Edward Harris

**E-MAIL:** [edharris55@yahoo.com](mailto:edharris55@yahoo.com)

**COMPANY:**

**ADDRESS:** 1670 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1651

**PHONE:** 2106033899

**FAX:**

**COMMENTS:** I am requesting a contested case hearing because my property is directly across the street from the proposed treated effluent flow leaving the Meyer ranch. The discharge occurs approximately 1 mile straight as a crow flies above my property off 1670 S. Cranes Mill Road. Because the creek winds its way down from the discharge point, the measurement in the application is approximately two miles across the Edwards Aquifer

*me*

Contributory and Recharge Zones when I measure on a map before it exits onto S Cranes Mill Road. My property line is 40 yards from this exit point. I have a sink hole recharge feature (TCEQ Austin and San Antonio personnel photographed) in limestone rock 60 yards from where Dry Comal Creek leaves the Meyer Ranch and enters my property. This area is very rich with Karst Formations as noted in the attached well drillers report from my water well (no returns). During the public meeting the TCEQ did not consider the contamination to ground water (my well) but only surface water. During the public meeting on June 18th the TCEQ did not state there was a requirement for an environmental study to be conducted by the developer to the impact of ground water subsurface stream flows within the Edwards Recharge Zone that the treated effluent will flow across. The developer will only be require to submit an environmental impact study after the permit is approved. I believe the lift gate system being proposed is not the best scenario for this area of the hill country and would rather see a TLAP system with membrane filtration, chlorinated, and ultra violet light sterilization of the very highest requirements for the Edwards Recharge Zone spraying the effluent onto the Meyer Ranch public areas. I had spoke with the TCEQ a representative about the ADR program but the only way of getting to this program is through a contested case hearing. Below is a copy of TCEQ response. Hi Ed, I am a mediator with the Commission's Alternative Dispute Resolution ("ADR") Program. Thank you for the voicemail and email concerning the Commission's ADR program. I hope this email will clarify what my office can offer the applicant and protestants and help clarify the Commission's normal hearing request process. The Agency actually does not have an arbitration option. If protestants want to request a hearing after protesting during the comment period, then they need to request a contested case hearing (which is essentially and administrative trial-type proceeding before an Administrative Law Judge). The ADR program then can offer the potential parties with ADR. I want to provide you a brief summary of the Commission's hearing procedures for this type of permit application so that you can know what to expect. The Commission has two types of hearings: 1) a public meeting in which individuals can submit questions and comments during the comment period; and 2) a contested case hearing which as an administrative hearing conducted by an Administrative Law Judge at the State Office of Administrative Hearings ("SOAH"). The Commission will grant a contested case hearing if it determines that a hearing requester qualifies as an "affected person" and has raised relevant and material issues to the application. I am unsure at what stage in the application process that the application in which you are protesting is, so I will start with the comment period. Once the comment period on an application closes, the Executive Director will draft and send the parties a "Response to Comment" document (and its decision on the application) which is designed to provide responses to all public comment on the application. The deadline for filing hearing requests will be described in the cover letter of that document and is 30 days from the date of the Executive Director's decision. Protestants can also file hearing requests earlier at the time they submit comments. Once the hearing request period closes, the Commission will need to make a determination of whether or not to grant the timely-filed hearing requests and consider any requests of reconsideration. The procedures for handling hearing requests can be found in the Commission's Chapter 55 rules. The Commission must determine whether or not the hearing requesters qualify as "affected persons" under the rules and whether or not those requesters have raised relevant and material issues under the Commission's jurisdiction concerning the proposed permit. The Commission will schedule that determination at one of the Commission's public Agenda meetings in Austin and provide written response and reply deadlines before the scheduled Agenda. If the Commission determines that the hearing requesters and reconsideration requesters do not meet the standards of "affected person" and/or have not raised relevant and material issues, then the Commission will deny the requests and issue the Executive Director's proposed permit. If the Commission determines to grant any hearing requests or the request for reconsideration, the Commission will refer the matter for a contested case hearing before SOAH. The Commission will specify the relevant and material issue that it wants SOAH to consider at the contested case hearing. If the Commission grants the hearing request(s) and refers the matter to SOAH, then the hearing requesters would have the opportunity to challenge the applicant's evidence and sufficiency of proposed application. Most contested case hearings have a preliminary hearing to take jurisdiction and establishing the parties, a procedural schedule that involves a discovery period and the filing of pre-filed testimony for the parties' direct cases, an evidentiary hearing, and the issuance of a proposal for decision that must be considered by the Commission. Many contested case hearings take six months to over a year until a final decision is reached. The parties bear their own costs in the hearing process. The Agency's Executive

Director and Office of Public Interest Counsel would participate in such a hearing as well. Once the hearing request period on the application closes, then my office can offer those hearing requesters and the applicant to consider a voluntary Alternative Dispute Resolution ("ADR") option at that stage in the process. The ADR procedure which the Commission employs is mediation. Mediation is a form of informal dispute resolution involving the use of an impartial third-party neutral called a mediator, who assists the parties in negotiating their dispute. As a mediator, I have no stake in the outcome of this matter and I will not pressure any party into a settlement agreement. My role is to encourage and facilitate productive communications between the parties, to elicit their true concerns and issues, and ultimately to guide them toward a resolution which addresses those concerns and issues. My function is not to formulate the solutions to a dispute, as that responsibility falls on the parties themselves during the mediation. I provide the parties the forum, the tools, and the guidance to formulate their own solutions to the issues. I cannot offer a magic procedure to solve your disagreement with what the Applicant is proposing, but sometimes parties benefit from having to sit in a face-to-face meeting to hear each side's positions on the issues and to collaboratively work on ways to resolve the issues. Because the resolution of disputes through mediation results from negotiations and compromise, mediation often results in a win/win outcome for the disputants. However, mediation participants usually must have some expectation of compromising in order to reach a resolution. No party's legal rights are affected by mere participation in mediation. Agreeing to mediate is completely voluntary. A mediated settlement agreement requires the consent of all parties. If any party wishes to discontinue settlement discussions at any time, the party is free to do so knowing that his or her legal rights in this matter have not been impaired in any way and the parties would continue in the Commission's contested case hearing process. Another important component of mediation is the confidentiality requirement. In an effort to encourage people to negotiate in earnest and to talk openly during the mediation process, all communications made by participants during and leading up to a mediation meeting are, by law, to be kept confidential and cannot be disclosed to outside persons (ie: the press, the Commission, a Judge, etc.). The Commission offers mediation for free, which I believe is quite beneficial to the parties when one considers the costs of hiring a private mediator. I hope this email has provided a helpful introduction to the Commission's ADR Program and how it may assist you in this matter. I encourage you and the other protestants to talk with each other when you consider whether mediation is a viable procedure at the appropriate point in the process. Because mediation is a voluntary process, all of the hearing requesters and the applicant must agree to participate before I may schedule a mediation. If any party prefers to move forward with the contested case hearing process instead of attempting to negotiate a resolution, I would cease mediation efforts and this matter would be considered under the Commission's usual hearing process. The decision whether or not to participate in ADR efforts also is to remain confidential and not disclosed to the Commission because ADR is a voluntary, optional process. Please do not hesitate to contact me if you have any further questions. I look forward to potentially working with you. Sincerely, Todd Burkey, Attorney-Mediator Phone: 512/239-2941 Fax: 512/239-4015 Email: [Todd.Burkey@tceq.texas.gov](mailto:Todd.Burkey@tceq.texas.gov)

ATTENTION OWNER: Confidentiality  
 Privilege Notice on reverse side  
 of Well Owner's copy (pink)

# State of Texas WELL REPORT

Texas Department of Licensing &  
 Regulation  
 P.O. Box 12157  
 Austin, TX 78711  
 512-463-7880

1) OWNER ED HARRIS ADDRESS 9718 COVERED WAGON CONVERSE TX 78109  
(Name) (Street or RFD) (City) (State) (Zip)

2) ADDRESS OF WELL'S LOCATION: 1700 CRANES MILL RD. NEW BRAUNFELS, TX 78132  
County COMAL (Street, RFD or other) (City) (State) (Zip) Long. Lat. Grid # 68-15-7

3) TYPE OF WORK (Check):  New Well  Deepening  Reconditioning  Plugging

4) PROPOSED USE (Check):  Monitor  Environmental Soil Boring  Domestic  
 Industrial  Irrigation  Injection  Public Supply  De-watering  Testwell  
 If Public Supply well, were plans submitted to the TNRCC?  Yes  No

6) WELL LOG: Date Drilling: Started 2/8 ~~2/8~~ 2002 Completed 3/6 ~~3/6~~ 2002

DIAMETER OF HOLE			
Dia. (In.)	From (ft.)	To (ft.)	
9-7/8	Surface	300	
6	300	440	
4-3/4	440	520	

7) DRILLING METHOD (Check):  Driven  Air Rotary  Mud Rotary  Bored  
 Air Hammer  Cable Tool  Jetted  Other

From (ft.)	To (ft.)	Description and color of formation material
0	30	CALICHE/WHITE LIMESTONE
30	440	LOST RETURNS
440	480	WHITE/BROWN LIMESTONE
480	520	HENDELLSAND

8) Borehole Completion (Check):  Open Hole  Straight Wall  
 Underreamed  Gravel Packed  Other  
 If Gravel Packed give interval from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

CASING, BLANK PIPE, AND WELL SCREEN DATA:

Dia. (In.)	New or Used	Steel, Plastic, etc. Perf., Slotted, etc. Screen Mfg., if commercial	Setting (ft.)		Gage Casting Screen
			From	To	
6	N	SOH 40 PVC	+ 1	300	

9) CEMENTING DATA  
 Cemented from 300 ft. to 290 ft. No. of sacks used 5  
10 ft. to 0 ft. No. of sacks used 7  
 Method used GRAVITY  
 Cemented by HASKIN ONE PUMP  
 Distance to septic system field lines or other concentrated contamination +150 ft.  
 Method of verification of above distance TAPE

13)  Well plugged within 48 hours

Casing left in well:		Cement/bentonite placed in well:		Sacks used:
From (ft)	To (ft)	From (ft)	To (ft)	

14) TYPE PUMP:  Turbine  Jet  Submersible  Cylinder  
 Other \_\_\_\_\_  
 Depth to pump bowls, cylinder, jet, etc., 504 ft.

16) WELL TESTS:  
 Type test:  Pump  Bailer  Jetted  Estimated  
 Yield: 10 gpm with 20 ft. drawdown after 1 hrs.

16) WATER QUALITY:  
 Did you knowingly penetrate any strata which contained undesirable constituents?  
 Yes  No If yes, submit "REPORT OF UNDESIRABLE WATER"  
 Type of water? \_\_\_\_\_ Depth of strata \_\_\_\_\_  
 Was a chemical analysis made?  Yes  No

10) SURFACE COMPLETION  
 Specified Surface Slab Installed  
 Specified Steel Sleeve Installed  
 Pileless Adapter Used  
 Approved Alternative Procedure Used

11) WATER LEVEL:  
 Static level 152 ft. below land surface Date 3/5/02  
 Artesian flow \_\_\_\_\_ gpm. Date \_\_\_\_\_

12) PACKERS:	Type	Depth
1 EA VINYL		300 FT
1 EA VINYL		10 FT

I certify that I drilled this well (or the well was drilled under my direct supervision) and that each and all of the statements herein are true and correct. I understand that failure to complete items 1 thru 16 will result in the log(s) being returned for completion and resubmittal.

COMPANY NAME HASKIN ONE PUMP, LTD. WELL DRILLER'S LICENSE NO. 5406 WPK  
(Type or print)

ADDRESS 107 BRANIFF SAN ANTONIO TX 78216  
(Street or RFD) (City) (State) (Zip)

(Signed) [Signature] (Signed) \_\_\_\_\_  
(Licensed Well Driller) (Registered Driller Trainee)

Please attach electric log, chemical analysis, and other pertinent information, if available.

# Request for Contested Case Hearing

## Permit # WQ0015314001

MWD  
9/6/05

I, Bonnie Houser, resident at and owner of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001

I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons.

- A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Vineyard Operations

- a) Increased waste water discharge into the Edwards Aquifer Contributory and Recharge Zones  
b) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen  
i) Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production  
ii) We routinely sample our soil to ensure that the proper nutrients and their levels are present.  
iii) Disruption in water source increases need for alternative fertilizer treatments which leech into the water source.

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2015 OCT 12 PM 1:12

CELESTINE  
OFFICE

- B) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

- 1) Increased the likelihood of *E-Coli* in the water supply which is used in irrigation of a food product and for public drinking water for our customers and employees in our business  
2) The winery is required by the Comal County Health Department to test our water for E-Coli  
a) Upon positive results, the winery will be shut down immediately until it's source is identified and remedied.  
A shut-down due to this identified E-Coli contamination will essentially put us out of business because by the onus is placed on Dry Comal Creek Vineyards to identify the source and rectify it. To do so will utilize capital monies that serve to keep the business running. Even a short-term closure will annihilate our ability to continue doing business.

REVIEWED H

OCT 12 2015

By [Signature]

- C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421,

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

#### How can pathogens enter my water? TCEQ RG-421

*Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff.*

Me

# Request for Contested Case Hearing

## Permit # WQ0015314001

*How can I protect my water system from contamination? TCEQ RG-421*

- Properly maintain all water facilities.
- Obtain a sanitary easement for each well.
- Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn)
- Install backflow preventers.
- Maintain a minimum pressure of 35 psi at all points within the distribution system.
- Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines.

D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool).

### **Result Impacts Perennial Pool**

- a) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen.

*The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review. by David L. Correll \**

### **Abstract**

*Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton.*

In summary, there remains a number of adverse affects that this Waste Water Treatment Plan will impose on downstream residents and businesses that have not been taken into consideration. Despite the fact that the permit request and supporting documentation 'meet' the intent of the regulations; TCEQ rapacious permitting process which maintains that the permittee will follow all building and monitoring requirements and that there is minimal or no long term effects is 'blue sky' thinking. While TCEQ may view my concerns as 'the sky is falling', I maintain that it's not a matter of 'if' but 'when' the sky will fall on this WWTP.

While it's clear in my brief interactions with TCEQ and attendance of contested case hearings whereby the opinions of the ALJ and OPIC were wholesale disregarded and that the TCEQ will do nothing but continue to allow this WWTP permit to continue, I implore TCEQ to consider the points presented above and properly address them such that the TCEQ increases the WWTP requirements to ensure minimal degradation to the Dry

# Request for Contested Case Hearing Permit # WQ0015314001

Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage.

Respectfully submitted:

Bonnie Houser

cc:

Comal County Commissioners

Donna Eccleston, Commissioner Precinct 1

Scott Haag, Commissioner, Precinct 2

Kevin Webb, Commissioner Precinct 3

Jen Crownover, Commissioner, Precinct 4

Representative Doug Miller

Legislator Donna Campbell

# West Fork Dry Comal Creek Watershed

## Proposed Treatment Plant

## ★ Dry Comal Creek Vineyard

Normal Condition

Wet Condition



**Legend**

USGS Elevation Contours

FEMA FIRM Q3

1% Flood Zone (100 year)

**Aquifer Zones**

Discharge Area (Contributing Zone)

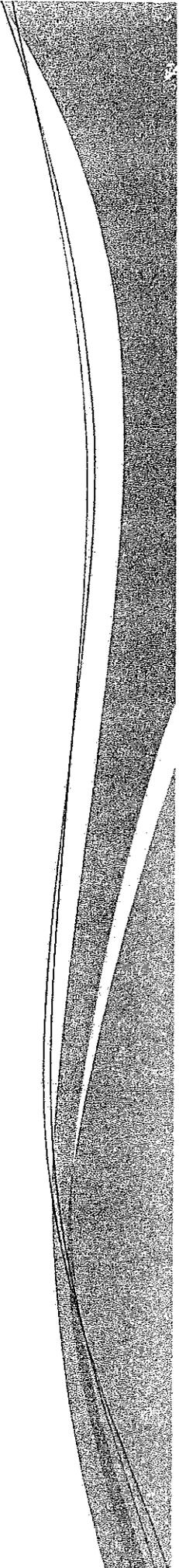
Recharge Zone

Aquifer Zone

USGS Streamflow

—	50-100
—	10-50
—	1-10
—	0-1
—	0-0.1
—	0-0.01
—	0-0.001
—	0-0.0001
—	0-0.00001





**Exhibit 2**  
**Dry Comal Creek**

# West Fork Dry Comal Creek Watershed

Proposed Treatment Plant

★ Dry Comal Creek Vineyard

Normal Condition

Wet Condition



**Legend**

USGS Elevation Contours

- 840
- 820
- 800
- 780
- 760
- 740
- 720
- 700
- 680
- 660
- 640
- 620
- 600
- 580
- 560
- 540
- 520
- 500
- 480
- 460
- 440
- 420
- 400
- 380
- 360
- 340
- 320
- 300
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- 120
- 100
- 80
- 60
- 40
- 20
- 0

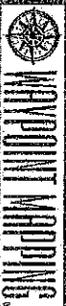
USGS Streamflow

- 100
- 200
- 300
- 400
- 500
- 600
- 700
- 800
- 900
- 1000
- 1100
- 1200
- 1300
- 1400
- 1500
- 1600
- 1700
- 1800
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- 8400
- 8500
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- 8700
- 8800
- 8900
- 9000
- 9100
- 9200
- 9300
- 9400
- 9500
- 9600
- 9700
- 9800
- 9900
- 10000

FEMA FIRM 03  
1% Flood Zone (100 year)

**Aquifer Zones**

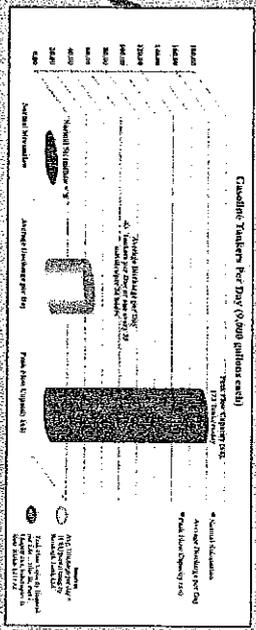
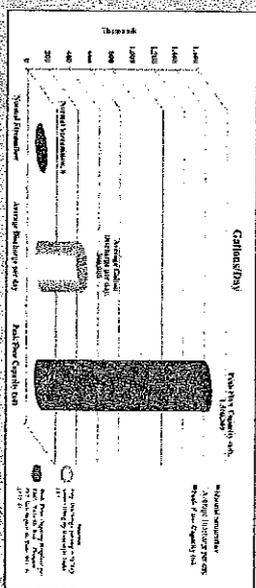
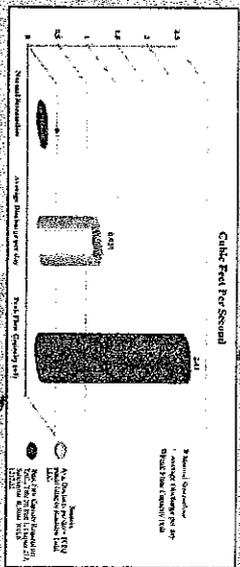
- Dunsmuir Ave (Contributing Zone)
- Recharge Zone
- Artesian Zone



# West Fork Dry Comal Creek - Comal Creek Watershed

## Where would all the wastewater go?

Proposed Wastewater Treatment Plant



**Legend**

USGS Stream Flow

- 100-150
- 150-200
- 200-250
- 250-300
- 300-350
- 350-400
- 400-450
- 450-500
- 500-550
- 550-600
- 600-650
- 650-700
- 700-750
- 750-800
- 800-850
- 850-900
- 900-950
- 950-1000
- 1000-1050
- 1050-1100
- 1100-1150
- 1150-1200
- 1200-1250
- 1250-1300
- 1300-1350
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- 2050-2100
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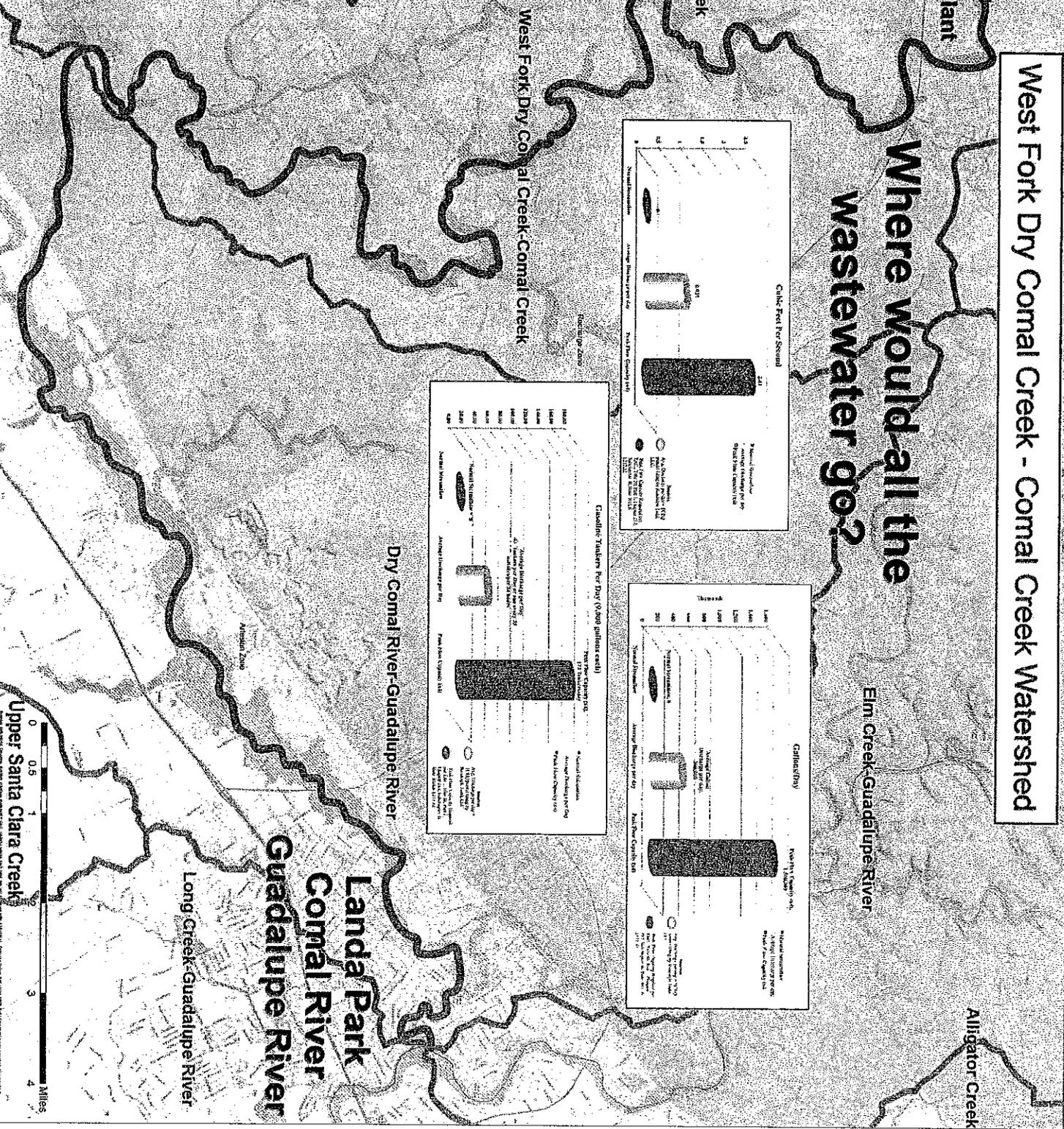
USGS Stream Gauge Network

**Watersheds TWDB**  
Texas Water Development Board - TWDB

**Aquifer Zone**

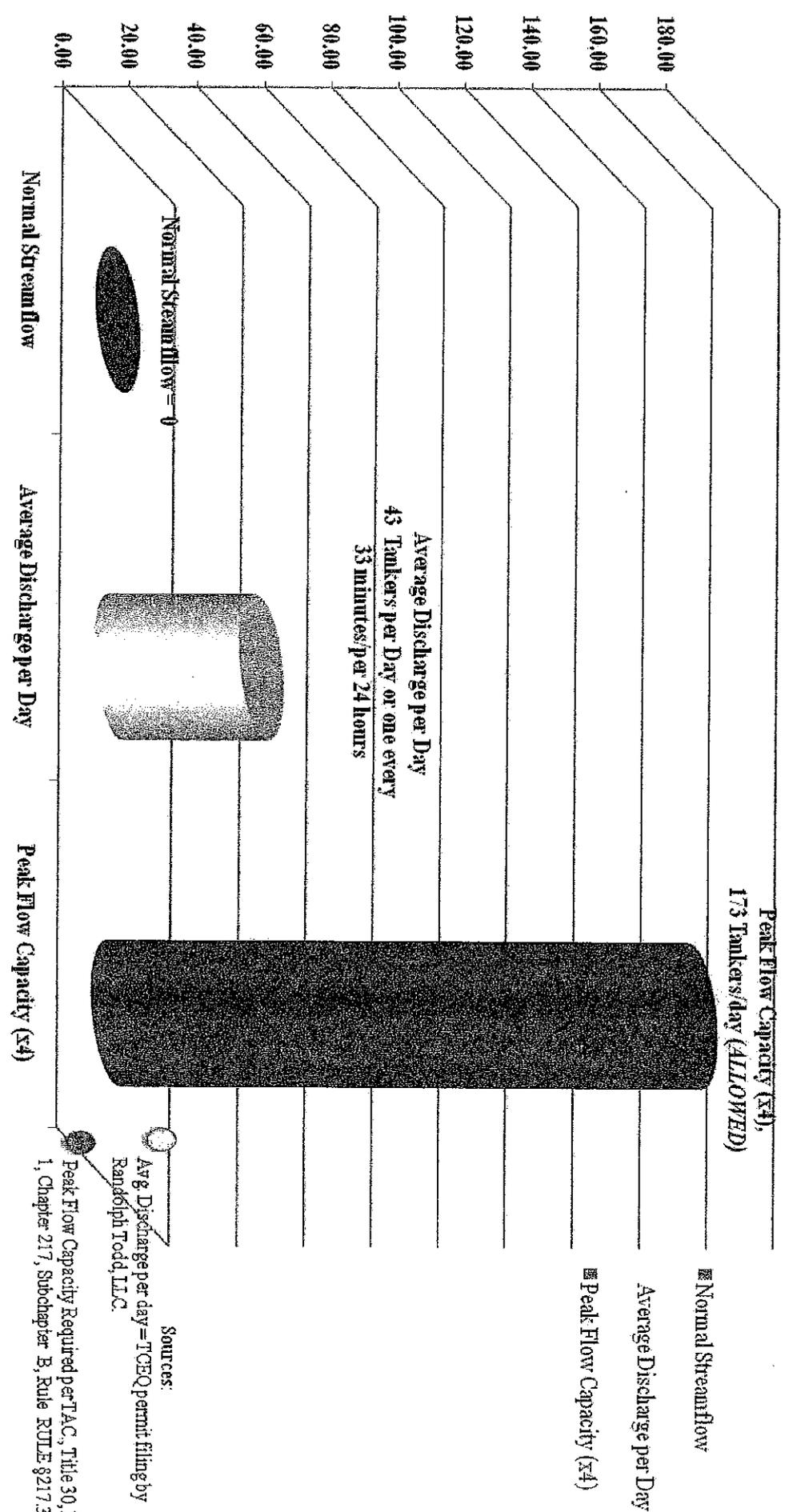
- Groundwater (Contributing Zone)
- Recharge Zone
- Artesian Zone
- Headwater (Contributing Zone)
- 1% Flood Zone (100 year)

100M 10000



# TCEQ. It's Your Duty to Protect The State's Public Health and Natural Resources

Gasoline Tankers Per Day (9,000 gallons each)



Sources:  
 Avg. Discharge per day = TCEQ permit filing by  
 Randolph Todd, LLC.  
 Peak Flow Capacity Required per TAC, Title 30, Part  
 1, Chapter 217, Subchapter B, Rule RULE §217.32

Edwards Aquifer Containing Zone

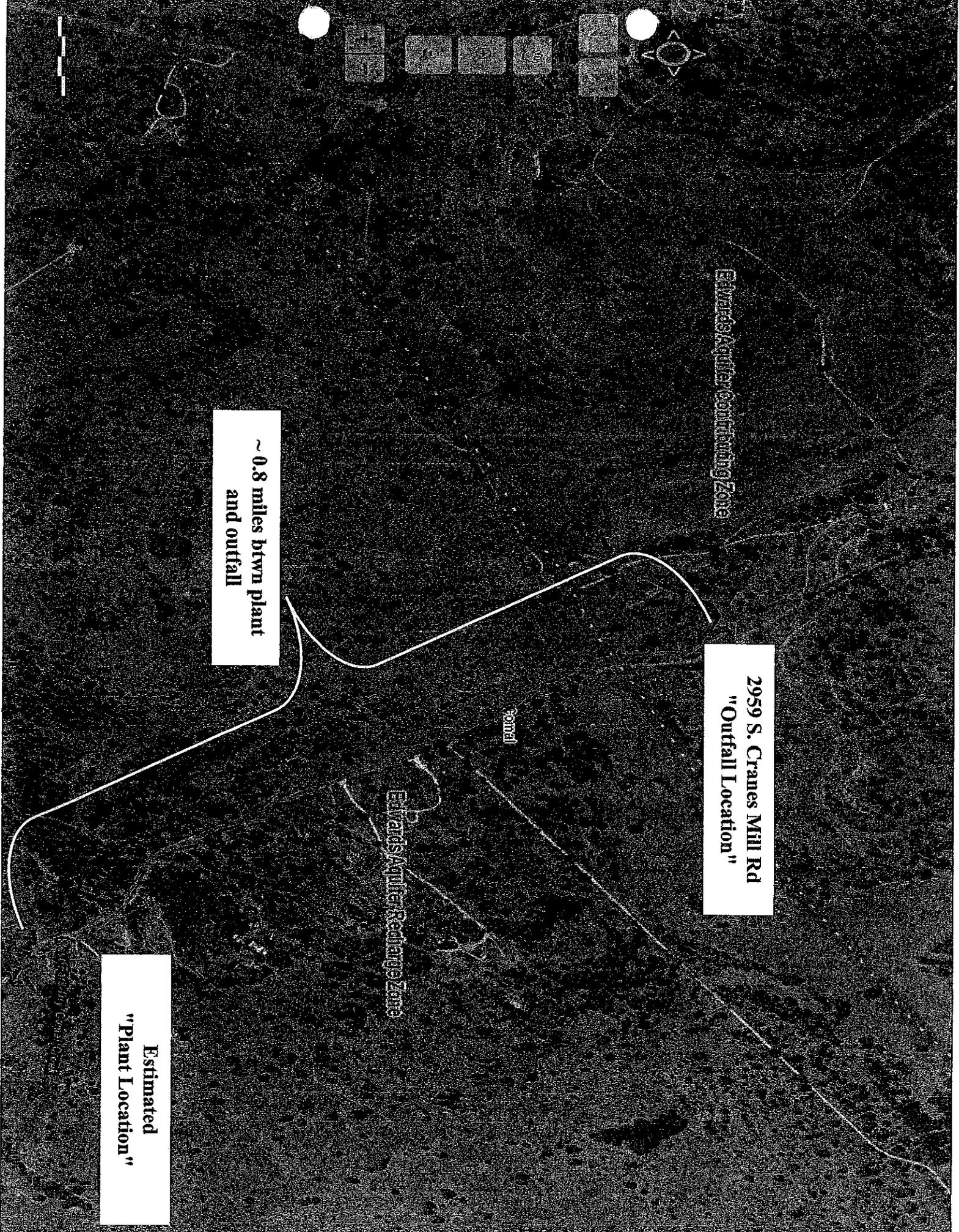
2959 S. Cranes Mill Rd  
"Outfall Location"

~0.8 miles btwn plant  
and outfall

canal

Edwards Aquifer Redesign Zone

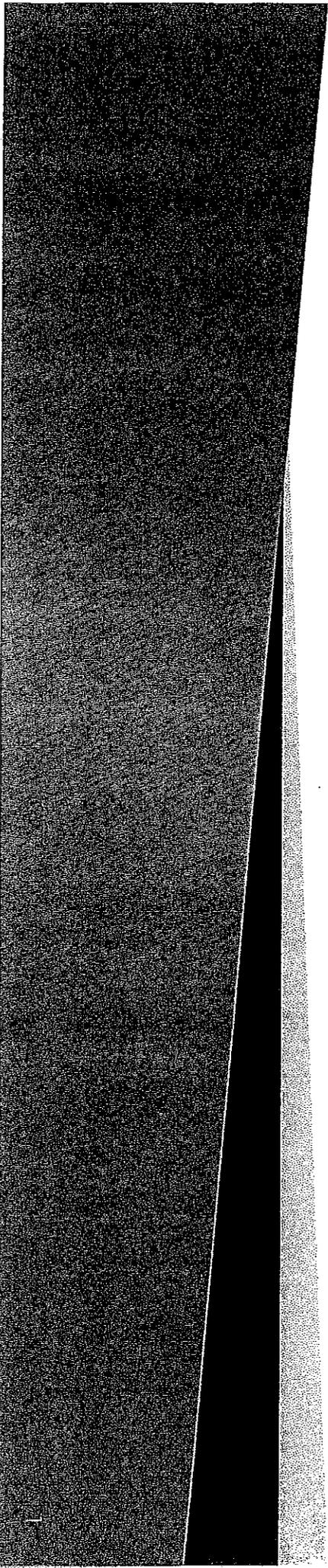
Estimated  
"Plant Location"



# Exhibit 3

## Dry Comal Creek

and Dry Comal Creek Vineyards



# Dry Comal Creek

## ▶ Perennial Pond

- Aquatic Life
- Water for Cattle
- Water for Wildlife
- Sits atop of Recharge Zone from which our wells tap into water for irrigating crops and provides drinking water for personal and business uses



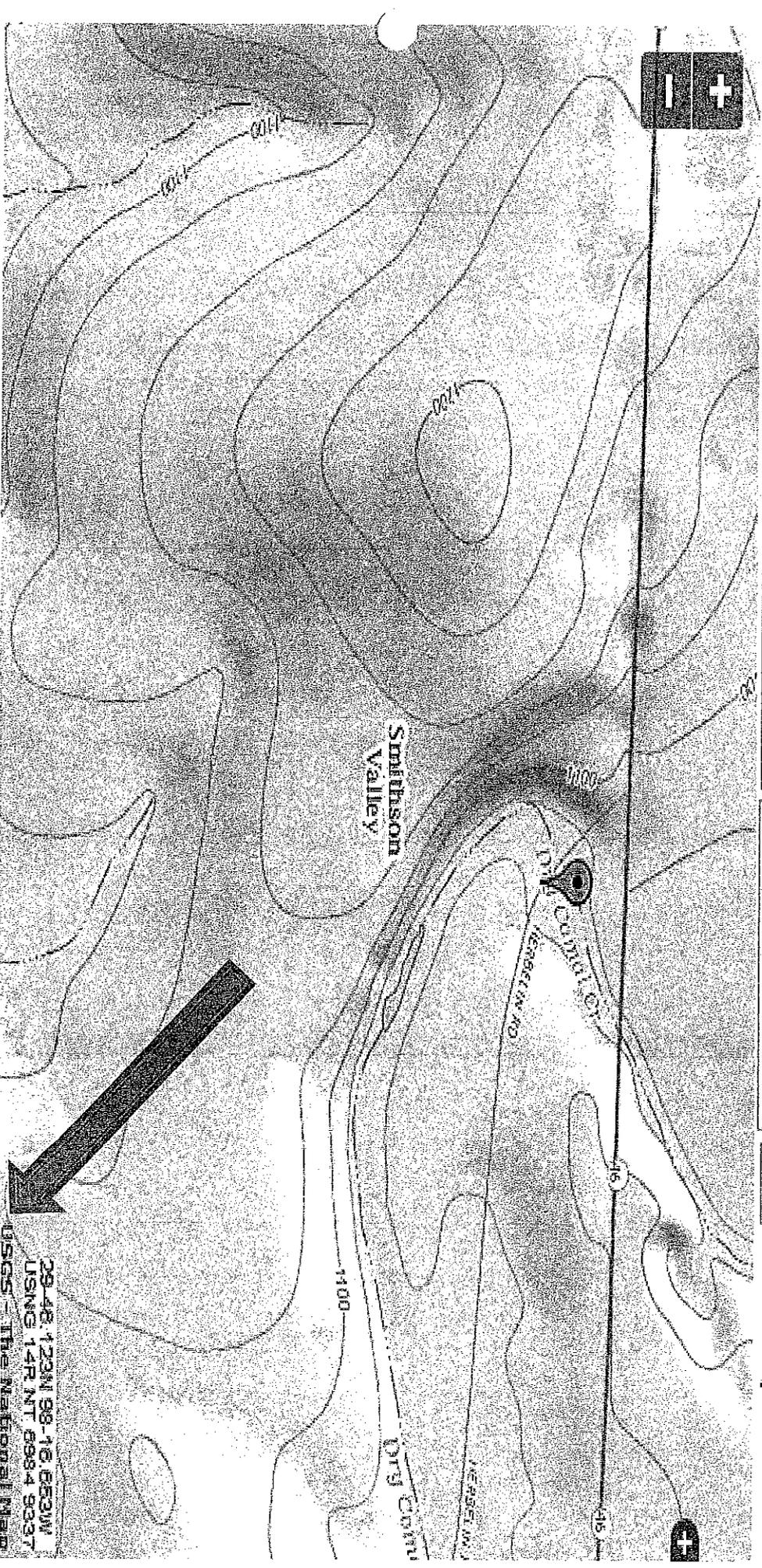
The USGS Store

< Back to Store About: USGS Maps : GEOPDF Maps : US Topo Maps : Historical Geographic M

# Map Locator & Downloader

Don't see the Map Locator & Downloader? Help | Having trouble? Call: 1-888-ASK-USGS (1-888-275-8747, Select

Search:  Address or Place

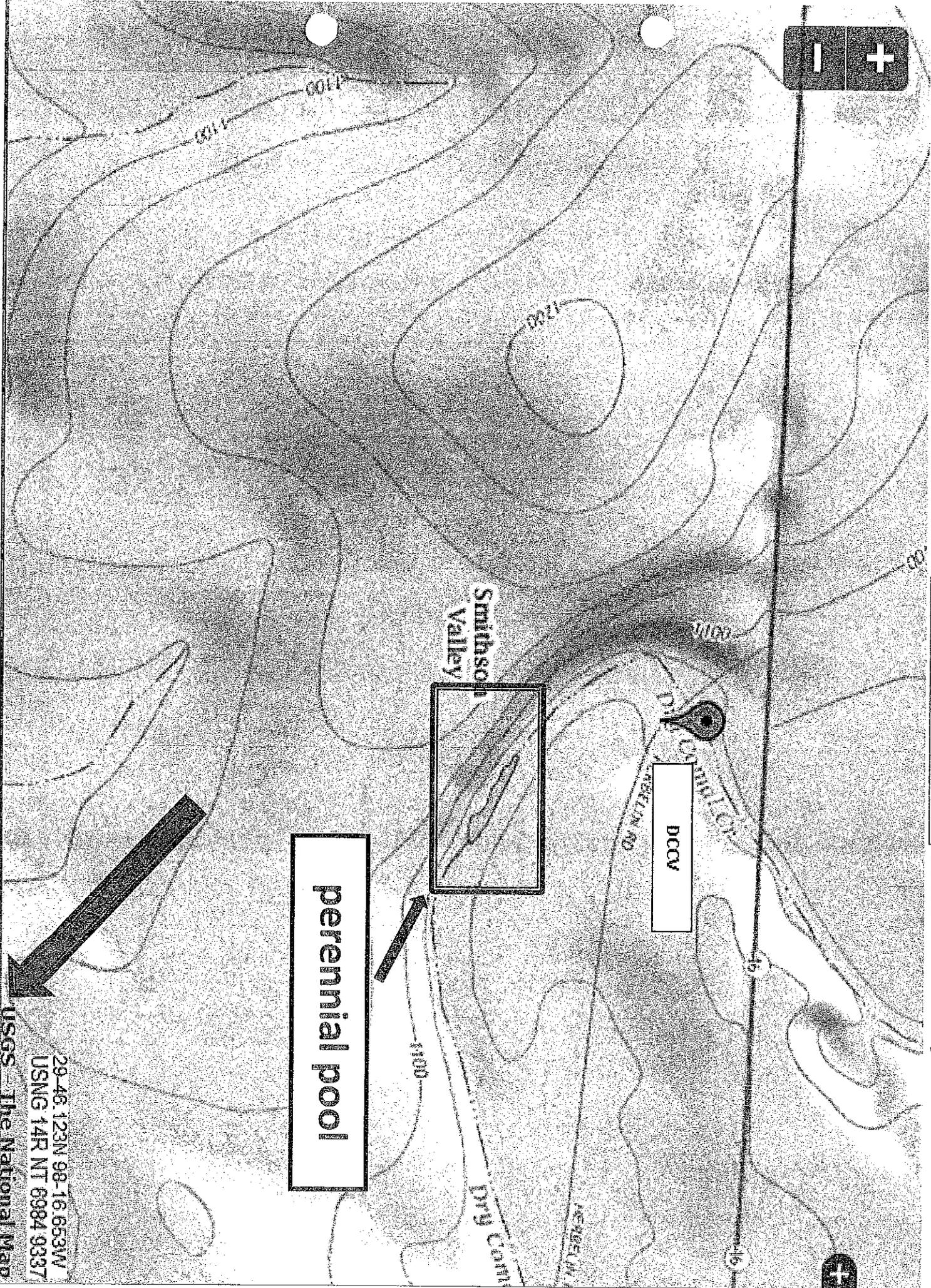
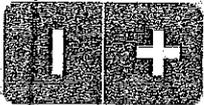


29 48 123N 98 16 853W  
USNG 14R NT 6984 9337  
USGS - The National Map

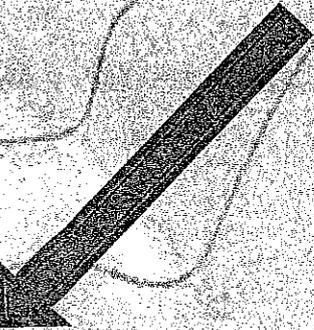
Search: 1741 Herbin rd, new braunfels

Address or Place v

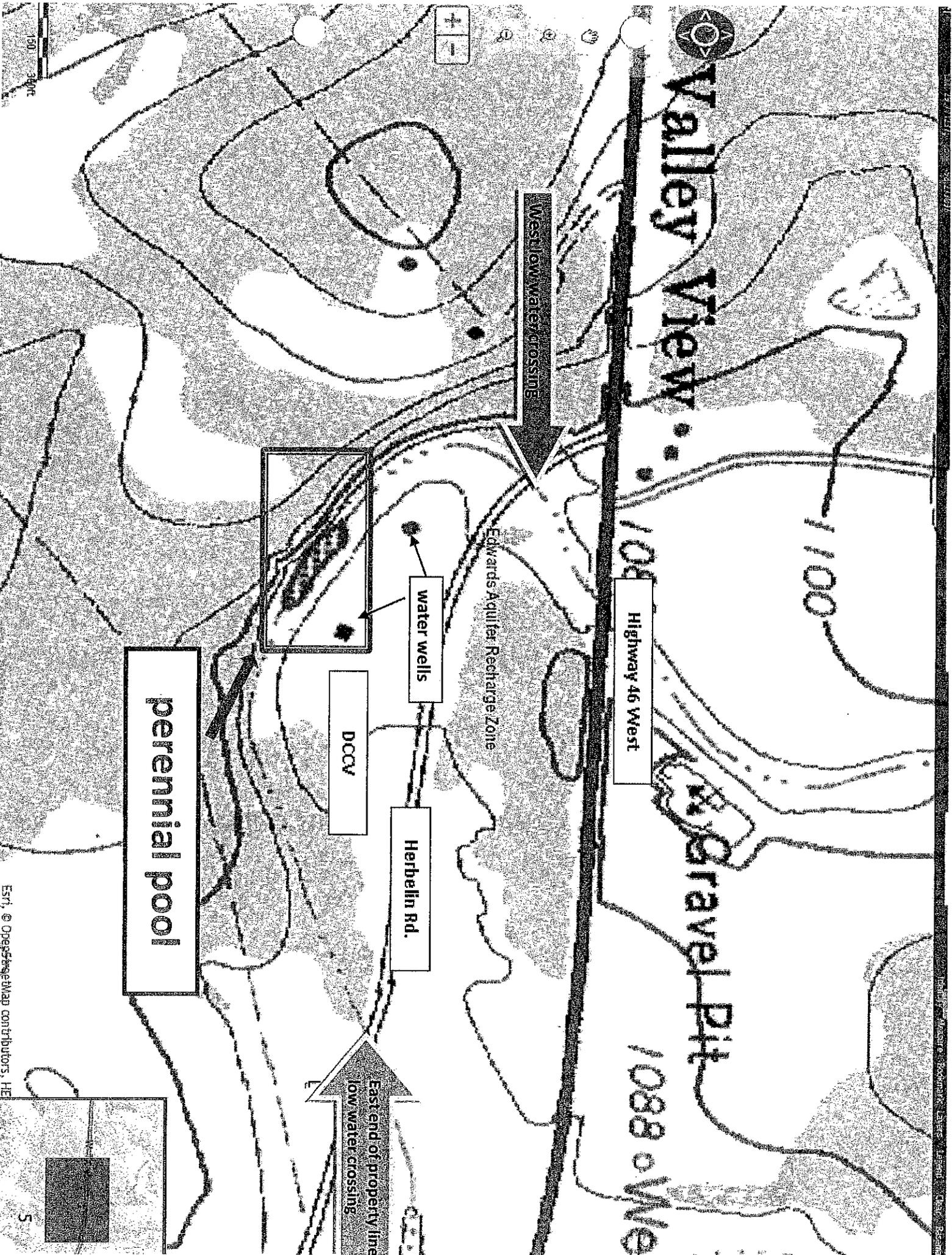
Go Search Help



perennial pool



29-46 123N 98-16 653W  
USNG 14R NT 8984 9337  
USGS - The National Map



Valley View

108 Highway 46 West

Gravel Pit

1088 0 We

1100

West low water crossing

Edwards Aquifer Recharge Zone

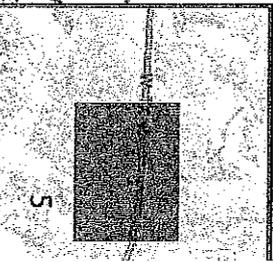
water wells

DCCV

Herbelin Rd.

perennial pool

East end of property line low water crossing



Wetland water possible



Highway 46 West

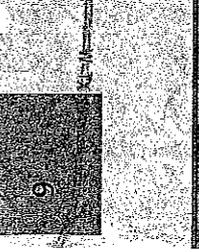
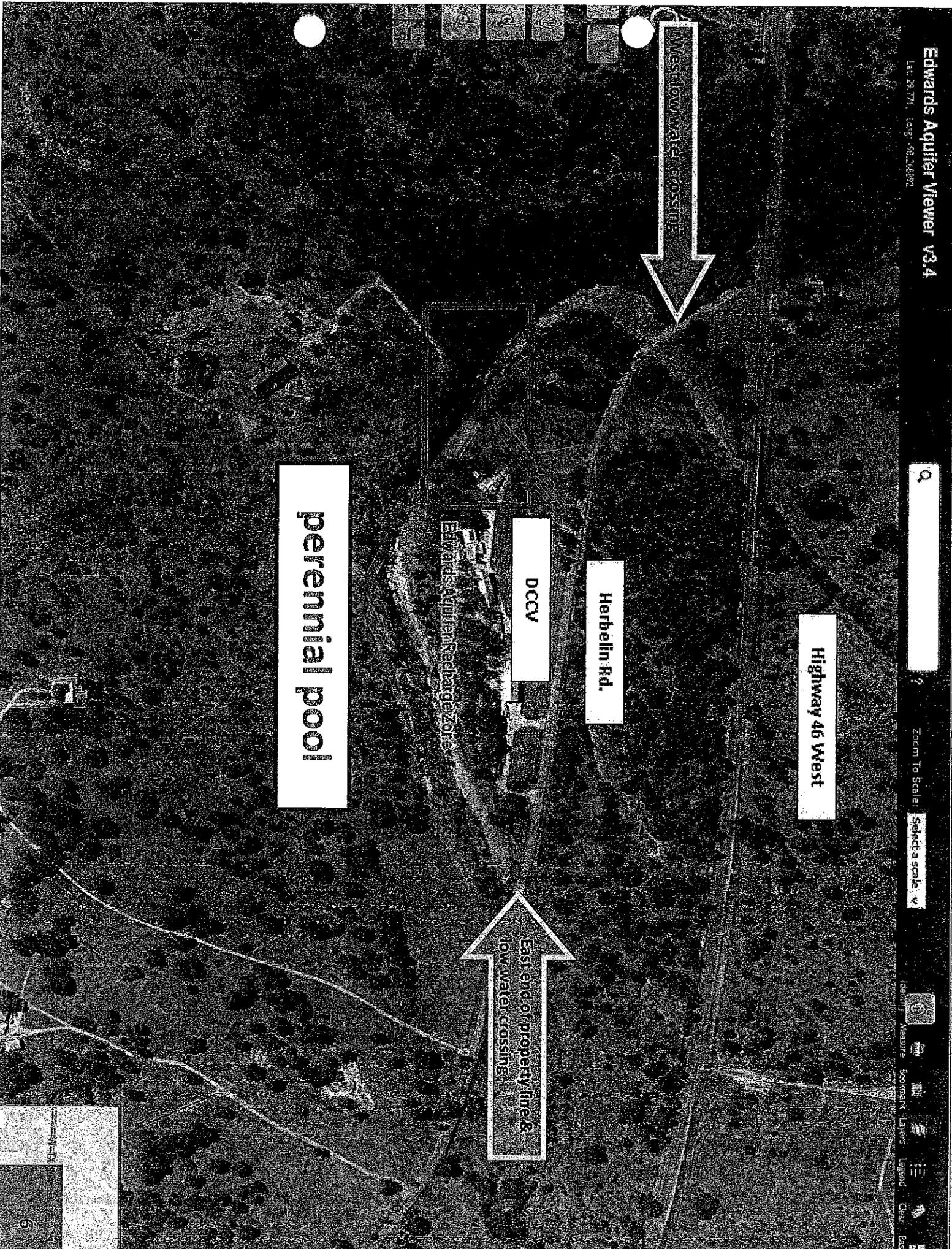
Herbelin Rd.

DCCV

Edwards Aquifer Recharge zone

perennial pool

East end of property line & low water crossing

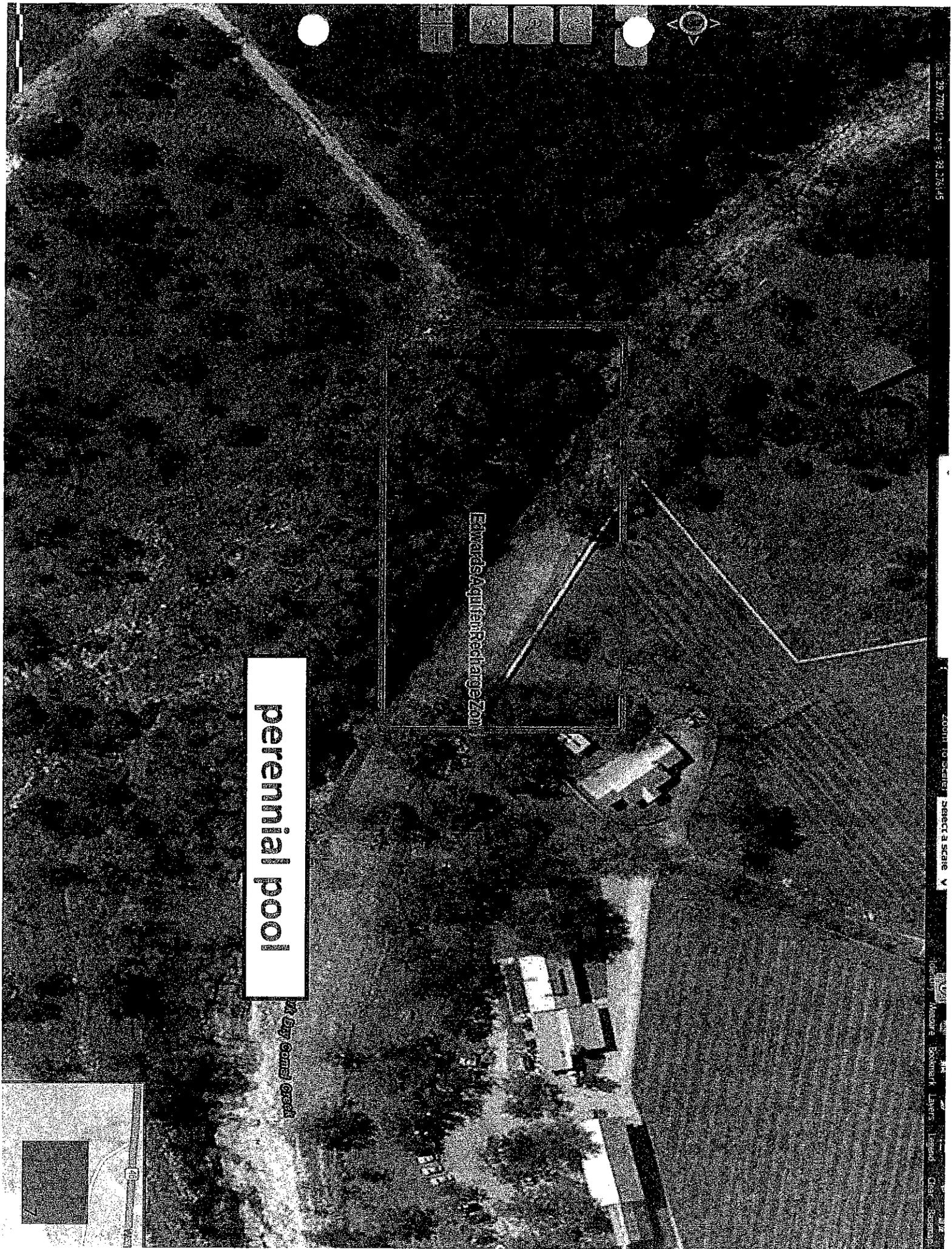
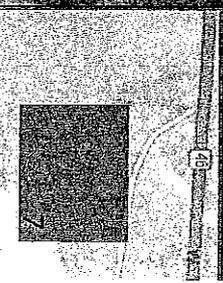


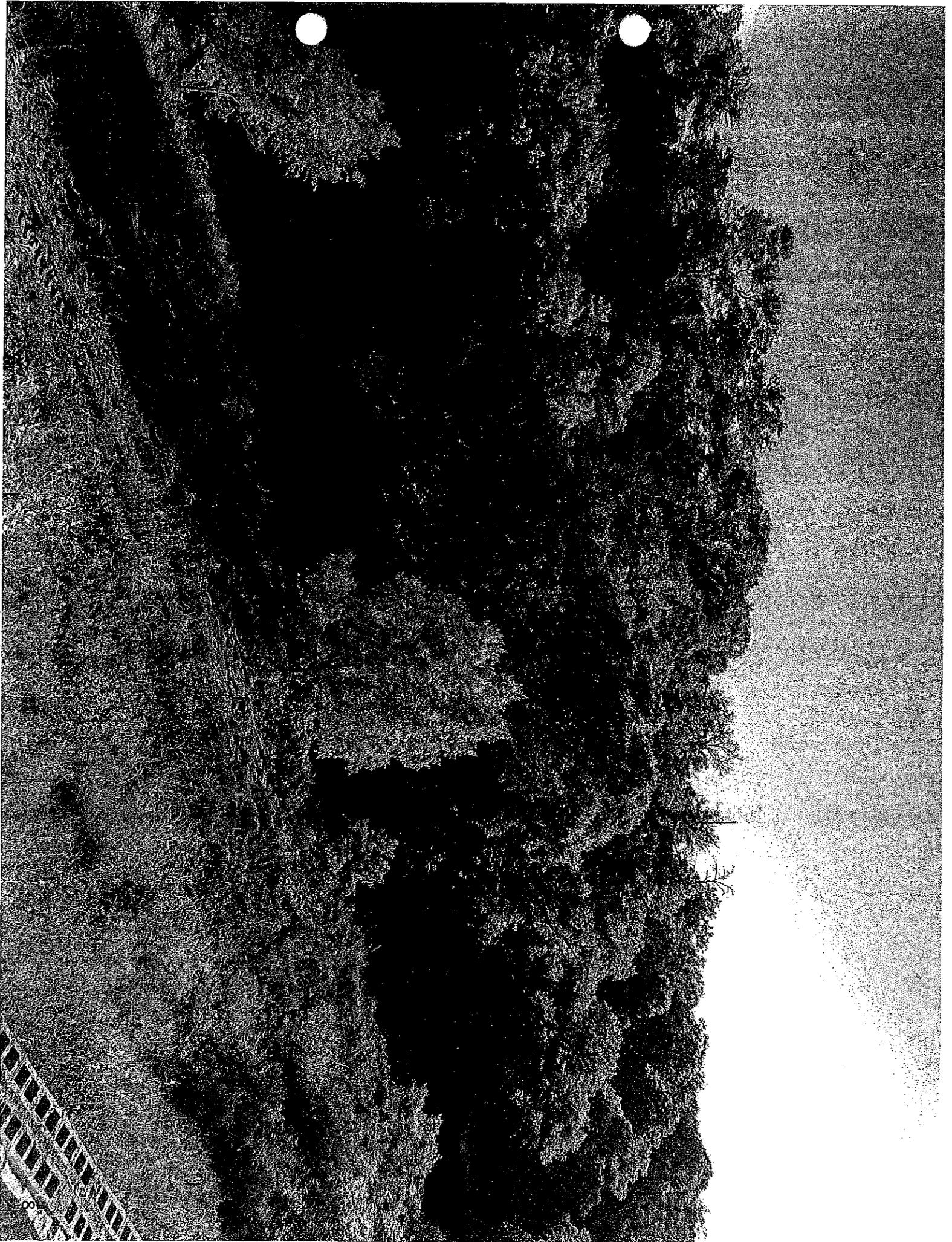


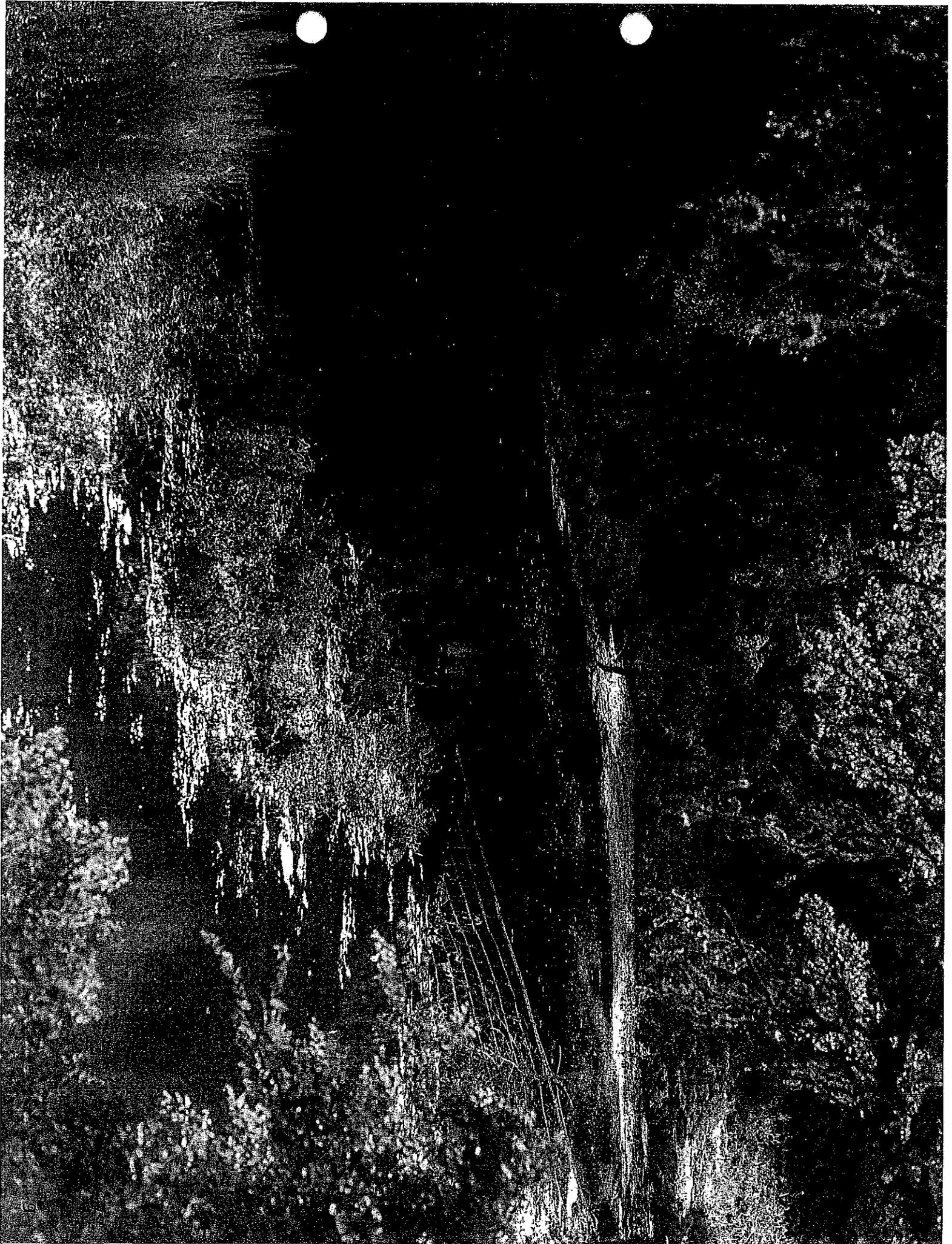
Edwards Aquifer Recharge Zone

perennial pool

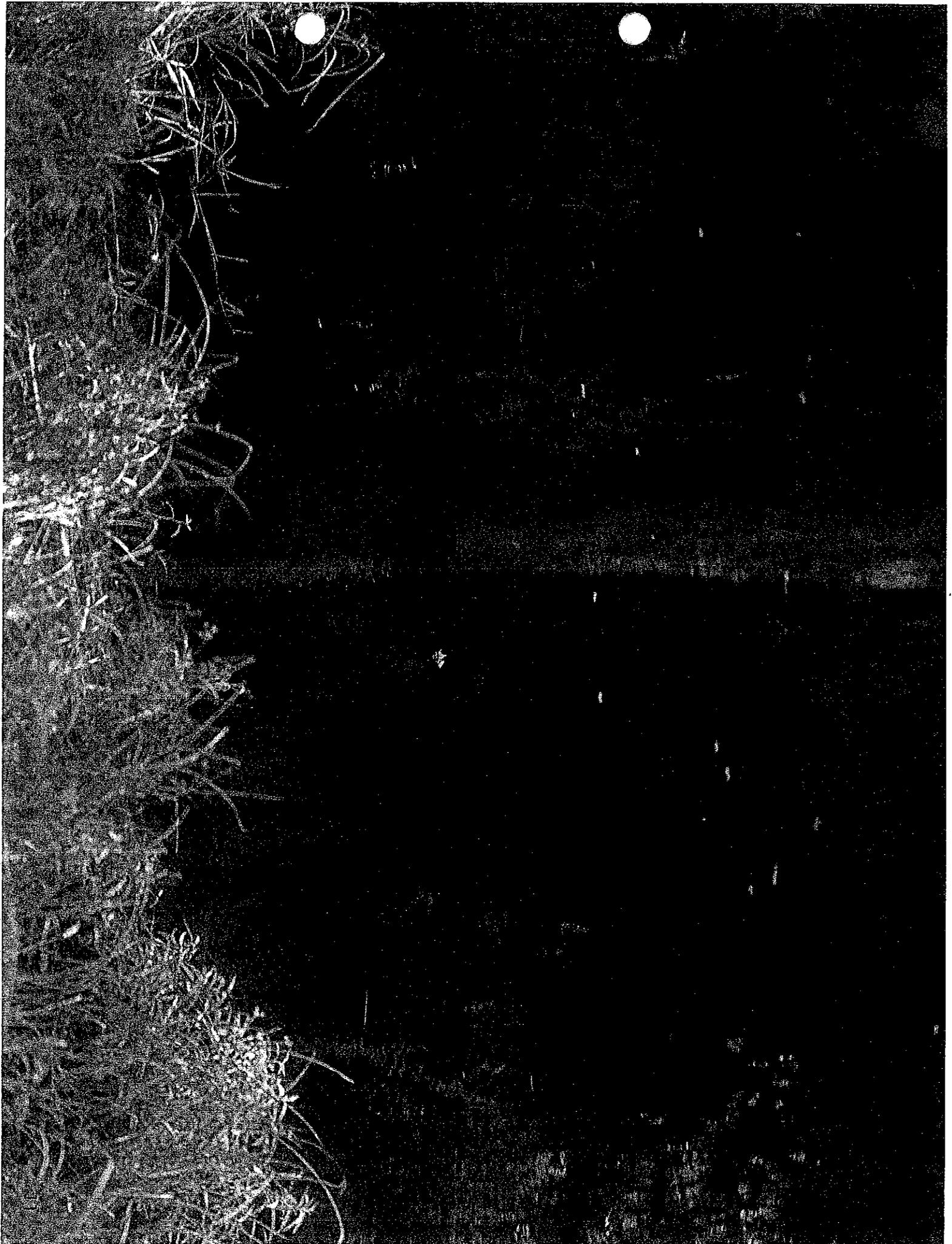
dry creek bed



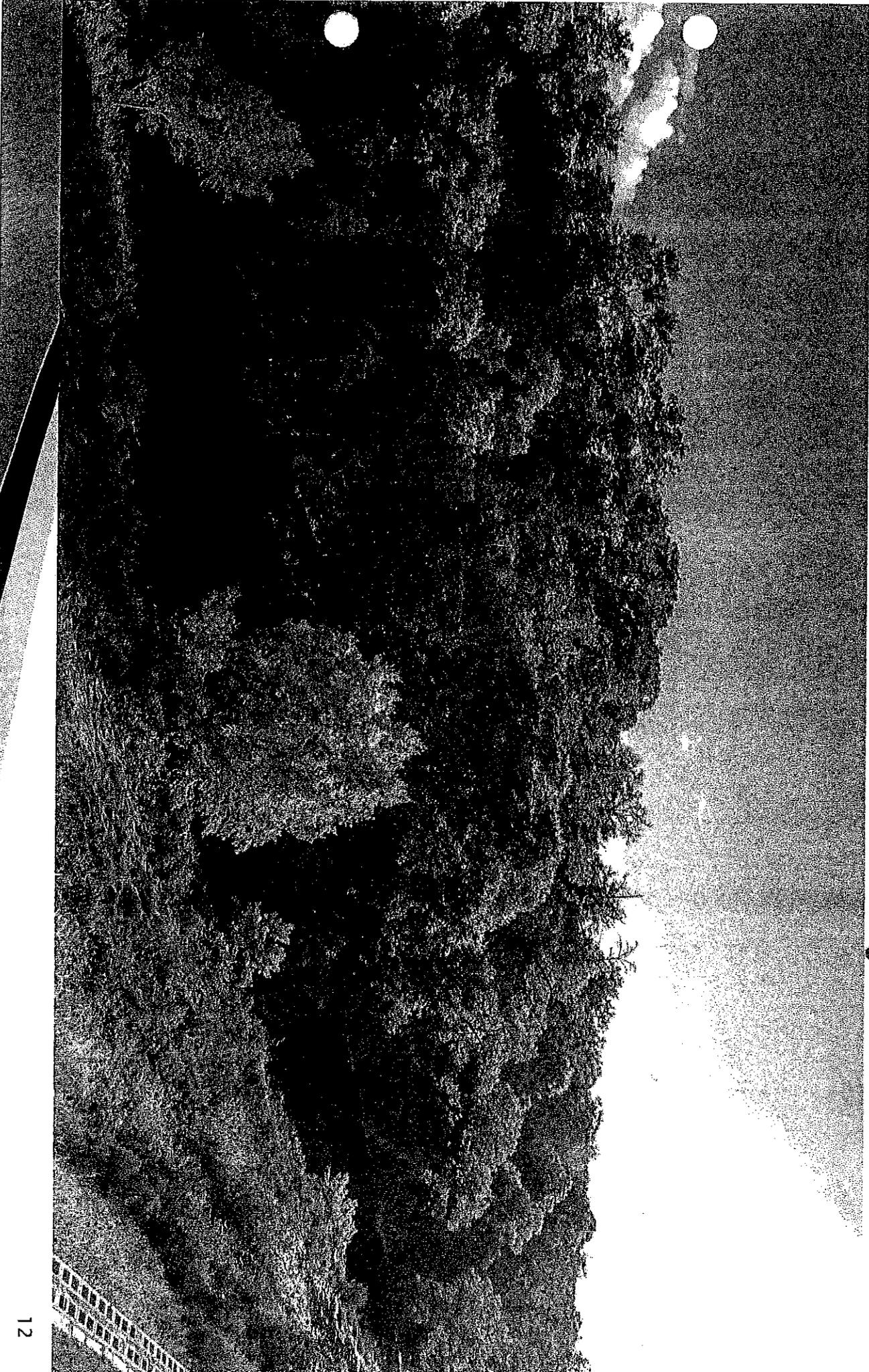


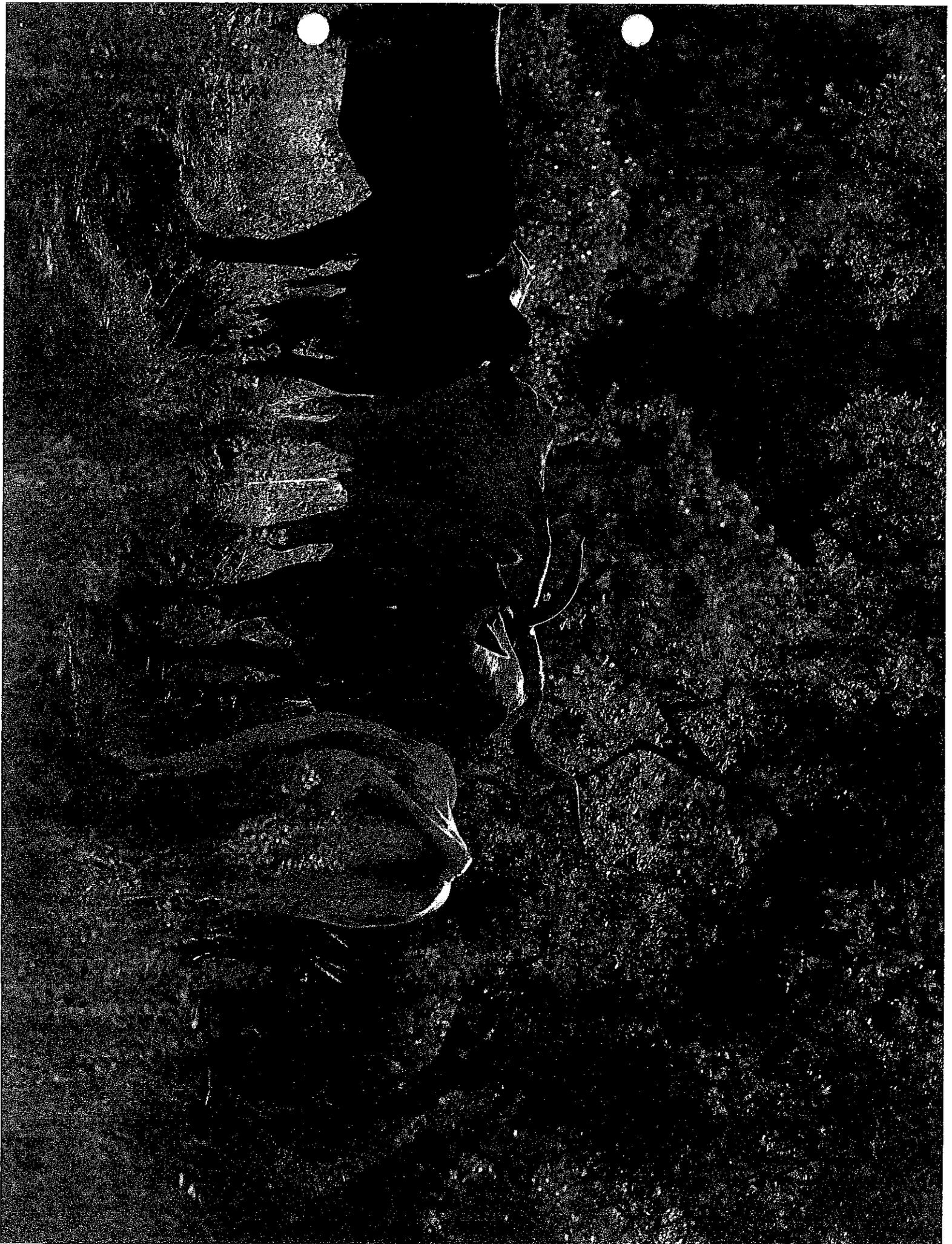


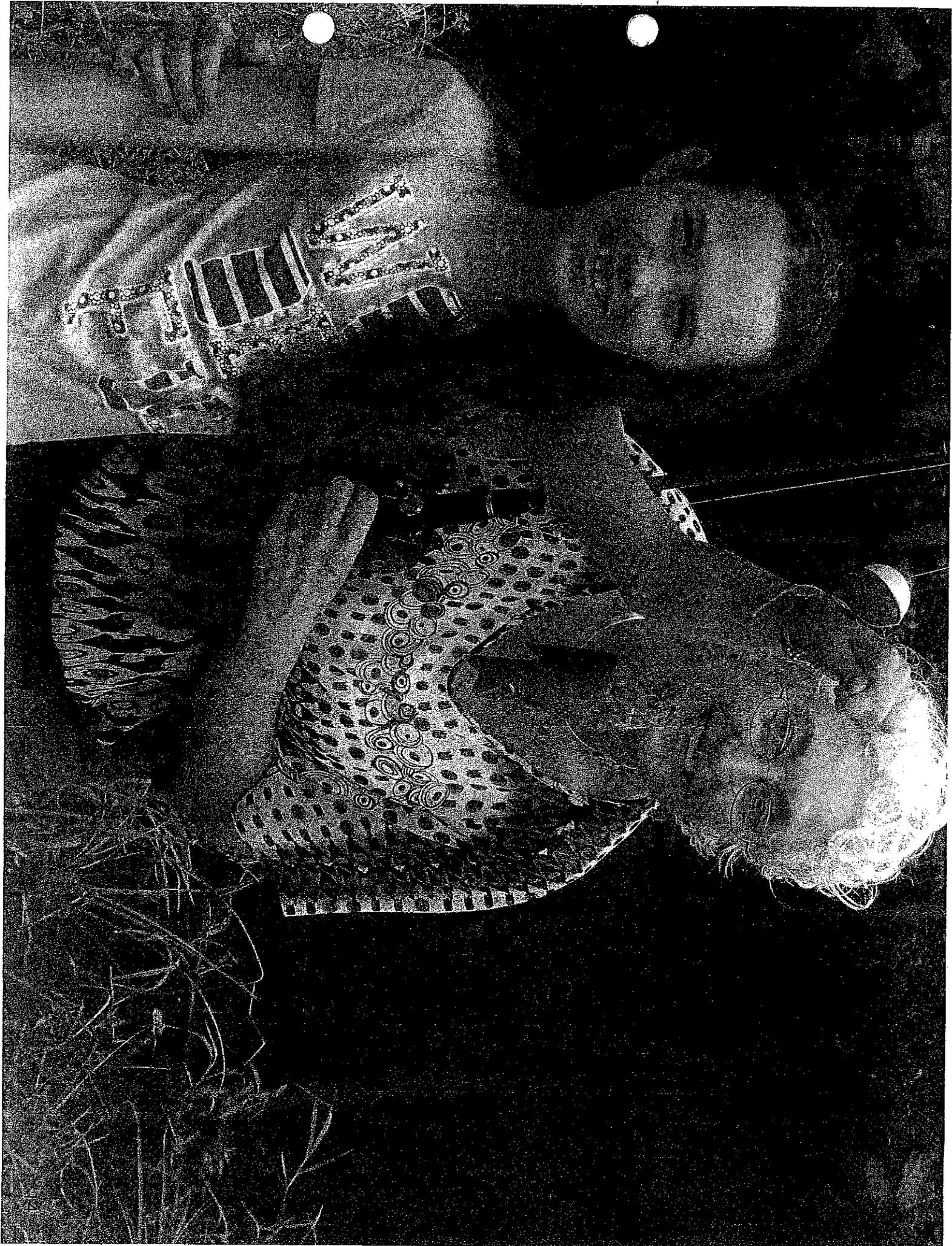




# **Panoramic View of Dry Comal Creek @ Dry Comal Creek Vineyards**







Dry Comal Creek Vineyards and Winery  
Sabrina Houser Amaya  
1741 Herbelin Rd.  
New Braunfels, TX 78132

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2015 OCT 17 AM 3:38

CHIEF CLERK'S OFFICE

**DRY COMAL CREEK**  
VINEYARDS  
AND WINERY  
Sabrina Houser  
Manager

1741 HERBELIN ROAD - NEW BRAUNFELS - TEXAS 78132  
cell: 830.456.2787 tele: 830.885.4076 fax: 830.885.4724  
sabrina@drycomalcreek.com www.drycomalcreek.com

Office of the Chief Clerk TCEQ  
12100 Park 35 Circle, Bldg F  
Austin, TX 78753

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:17 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** howzr@swbell.net [mailto:howzr@swbell.net]  
**Sent:** Sunday, October 11, 2015 8:41 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Bonnie Houser

**E-MAIL:** [howzr@swbell.net](mailto:howzr@swbell.net)

**COMPANY:** Dry Comal Creek Vineyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8308854076

**FAX:**

**COMMENTS:** I, Bonnie Houser, resident at and owner of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001 I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons. A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant

*MWD*

and outfall sites (See Exhibit 1) Result Impacts Vineyard Operations a) Increased waste water discharge into the Edwards Aquifer Contributory and Recharge Zones b) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen i) Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production ii) We routinely sample our soil to ensure that the proper nutrients and their levels are present. iii) Disruption in water source increases need for alternative fertilizer treatments which leech into the water source. B) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1) Result Impacts Public Water Supply and Ability for Business to Remain in Business 1) Increased the likelihood of E-Coli in the water supply which is used in irrigation of a food product and for public drinking water for our customers and employees in our business 2) The winery is required by the Comal County Health Department to test our water for E-Coli a) Upon positive results, the winery will be shut down immediately until it 's source is identified and remedied. b) A shut-down due to this identified E-Coli contamination will essentially put us out of business because by the onus is placed on Dry Comal Creek Vineyards to identify the source and rectify it. To do so will utilize capital monies that serve to keep the business running. Even a short-term closure will annihilate our ability to continue doing business. C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421, Result Impacts Public Water Supply and Ability for Business to Remain in Business How can pathogens enter my water? TCEQ RG-421 Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff. How can I protect my water system from contamination? TCEQ RG-421 • Properly maintain all water facilities. • Obtain a sanitary easement for each well. • Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn) • Install backflow preventers. • Maintain a minimum pressure of 35 psi at all points within the distribution system. • Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines. D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool). Result Impacts Perennial Pool a) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen. The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review. by David L. Correll \* Abstract Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it

is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton. In summary, there remains a number of adverse affects that this Waste Water Treatment Plan will impose on downstream residents and businesses that have not been taken into consideration. Despite the fact that the permit request and supporting documentation 'meet' the intent of the regulations; TCEQ rapacious permitting process which maintains that the permittee will follow all building and monitoring requirements and that there is minimal or no long term effects is 'blue sky' thinking. While TCEQ may view my concerns as 'the sky is falling', I maintain that it's not a matter of 'if' but 'when' the sky will fall on this WWTP. While it's clear in my brief interactions with TCEQ and attendance of contested case hearings whereby the opinions of the ALJ and OPIC were wholesale disregarded and that the TCEQ will do nothing but continue to allow this WWTP permit to continue, I implore TCEQ to consider the points presented above and properly address them such that the TCEQ increases the WWTP requirements to ensure minimal degradation to the Dry Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage. Respectfully submitted:  
Bonnie Houser cc: Comal County Commissioners Donna Eccleston, Commissioner Precinct 1 Scott Haag, Commissioner, Precinct 2 Kevin Webb, Commissioner Precinct 3 Jen Crownover, Commissioner, Precinct 4 Representative Doug Miller Legislator Donna Campbell

# Request for Contested Case Hearing Permit # WQ0015314001

MWD  
9/16/05

I, Franklin Houser, resident at and owner of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001

I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons.

A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Vineyard Operations

- a) Increased waste water discharge into the Edwards Aquifer Contributory and Recharge Zones
- b) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen
  - i) Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production
  - ii) We routinely sample our soil to ensure that the proper nutrients and their levels are present.
  - iii) Disruption in water source increases need for alternative fertilizer treatments which leech into the water source.

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2015 OCT 12 PM 11:12

CHELSEA STOKES

B) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

- 1) Increased the likelihood of *E-Coli* in the water supply which is used in irrigation of a food product and for public drinking water for our customers and employees in our business
- 2) The winery is required by the Comal County Health Department to test our water for E-Coli
  - a) Upon positive results, the winery will be shut down immediately until it 's source is identified and remedied.
  - b) A shut-down due to this identified E-Coli contamination will essentially put us out of business because by the onus is placed on Dry Comal Creek Vineyards to identify the source and rectify it. To do so will utilize capital monies that serve to keep the business running. Even a short-term closure will annihilate our ability to continue doing business.

REVIEWED  
OCT 12 2015  
BY [Signature]

C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421,

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

*How can pathogens enter my water?* TCEQ RG-421

*Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff.*

# Request for Contested Case Hearing

## Permit # WQ0015314001

**How can I protect my water system from contamination?** TCEQ RG-421

- Properly maintain all water facilities.
- Obtain a sanitary easement for each well.
- Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn)
- Install backflow preventers.
- Maintain a minimum pressure of 35 psi at all points within the distribution system.
- Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines.

D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool).

### Result Impacts Perennial Pool

- a) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen.

***The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review.* by David L. Correll \***

### ***Abstract***

*Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton.*

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# Request for Contested Case Hearing Permit # WQ0015314001

Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage.

Respectfully submitted:

Franklin Houser

cc:

Comal County Commissioners

Donna Eccleston, Commissioner Precinct 1

Scott Haag, Commissioner, Precinct 2

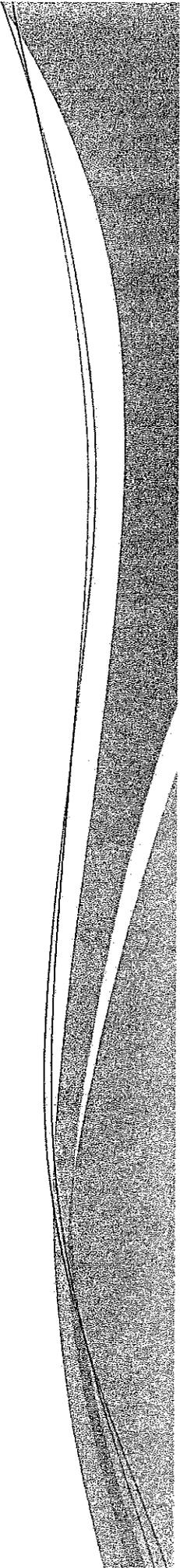
Kevin Webb, Commissioner Precinct 3

Jen Crownover, Commissioner, Precinct 4

Representative Doug Miller

Legislator Donna Campbell





**Exhibit 2**  
**Dry Comal Creek**

# West Fork Dry Comal Creek Watershed

Proposed Treatment Plant

Dry Comal Creek Vineyard

Normal Condition

Wet Condition



**Legend**

USGS Streamflow  
FEMA FIRM 03  
7% Flood Zone (100 year)  
Aquifer Zones  
Discharge Area (Contributing Zone)  
Recharge Zone  
Artesian Zone

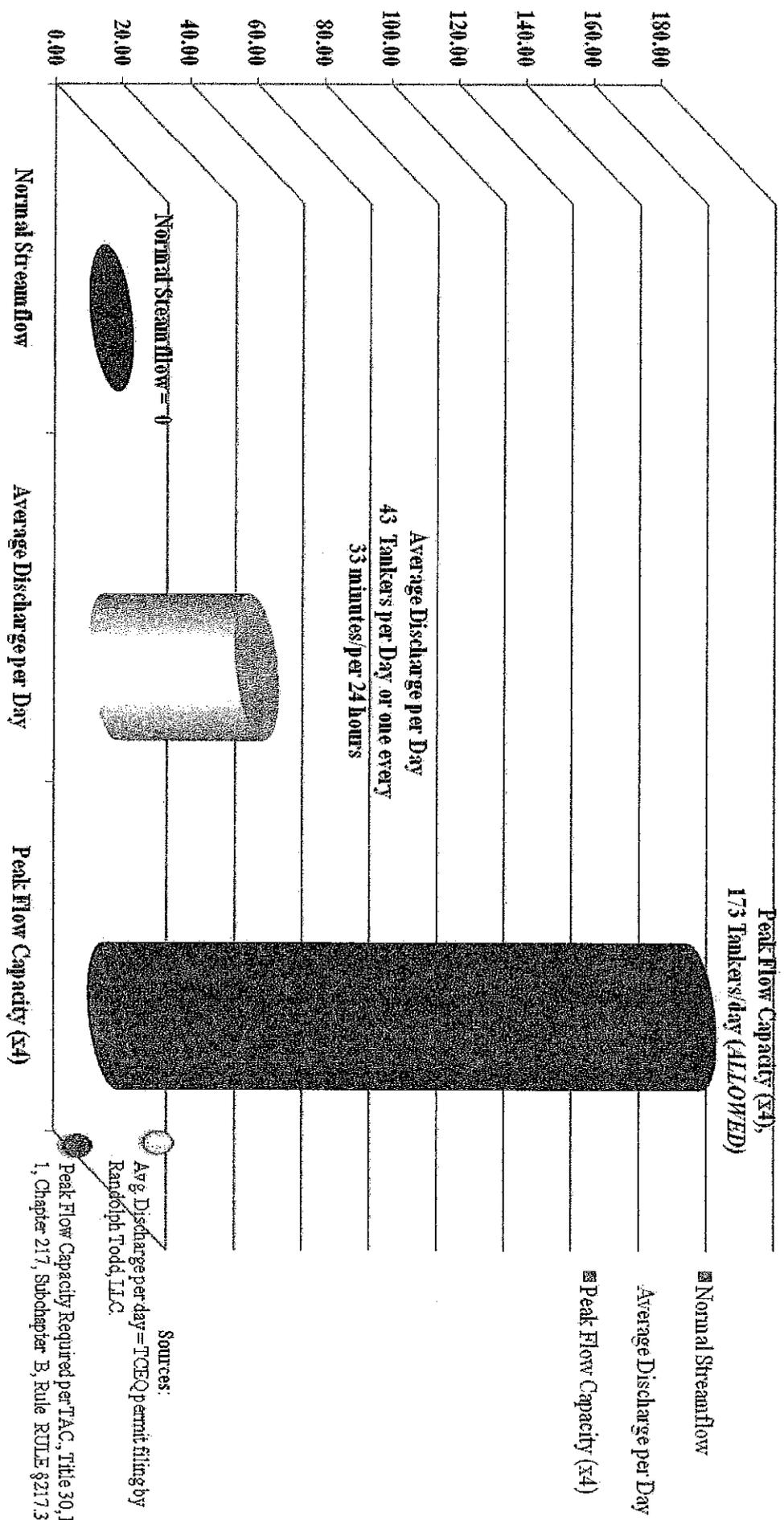
USGS Streamflow  
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— 4,801-5,000  
— 5,001-5,200  
— 5,201-5,400  
— 5,401-5,600  
— 5,601-5,800  
— 5,801-6,000  
— 6,001-6,200  
— 6,201-6,400  
— 6,401-6,600  
— 6,601-6,800  
— 6,801-7,000  
— 7,001-7,200  
— 7,201-7,400  
— 7,401-7,600  
— 7,601-7,800  
— 7,801-8,000  
— 8,001-8,200  
— 8,201-8,400  
— 8,401-8,600  
— 8,601-8,800  
— 8,801-9,000  
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— 9,401-9,600  
— 9,601-9,800  
— 9,801-10,000



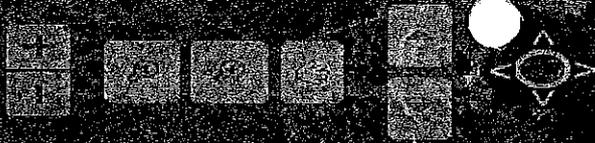


# TCEQ. It's Your Duty to Protect The State's Public Health and Natural Resources

Gasoline Tankers Per Day (9,000 gallons each)



Sources:  
 Avg Discharge per day = TCEQ permit filing by Randolph Todd, LLC.  
 Peak Flow Capacity Required per TAC, Title 30, Part 1, Chapter 217, Subchapter B, Rule RULE §217.32



Edwards Aquifer Contributing Zone

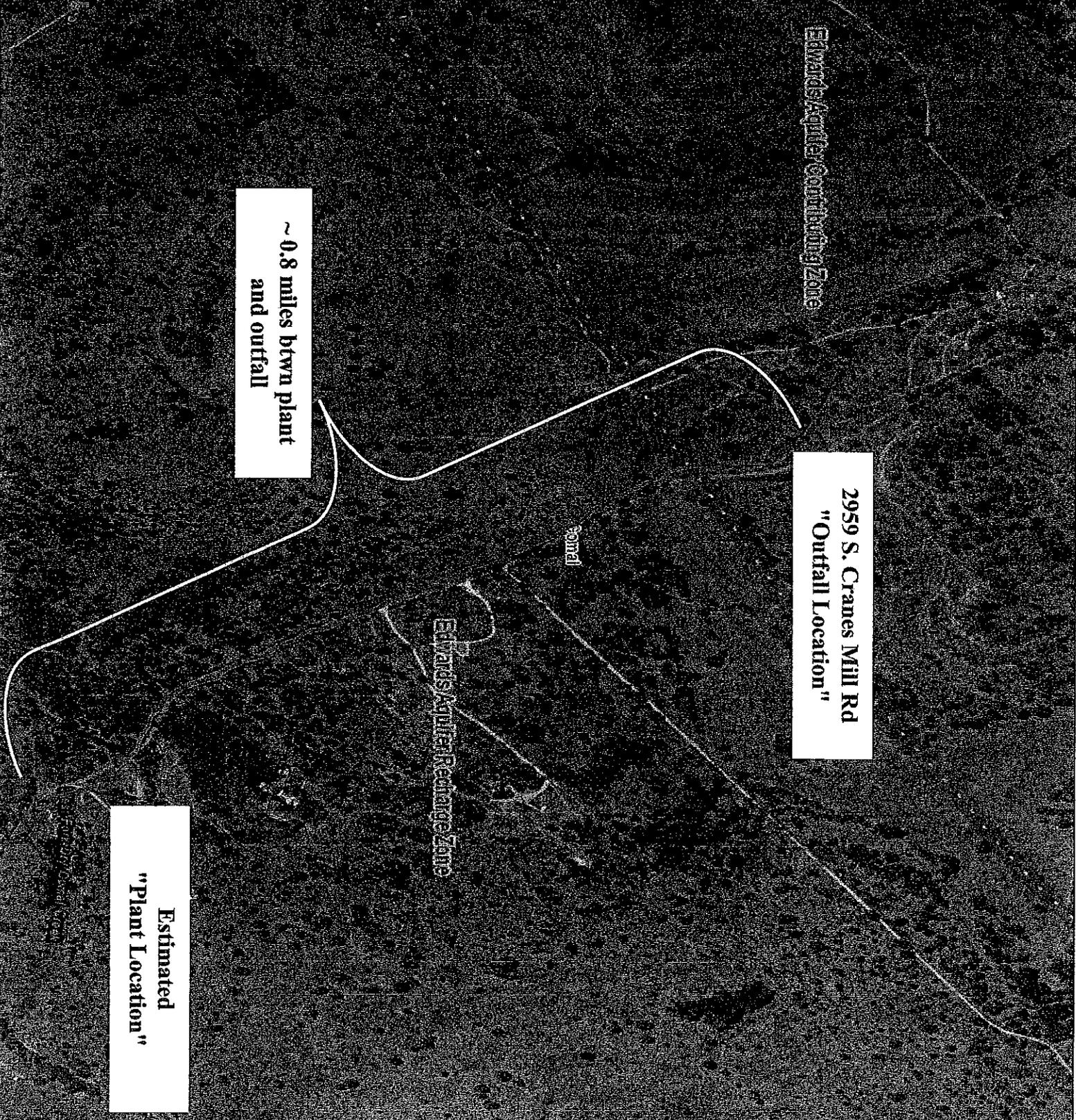
2959 S. Cranes Mill Rd  
"Outfall Location"

Canal

Edwards Aquifer Recharge Zone

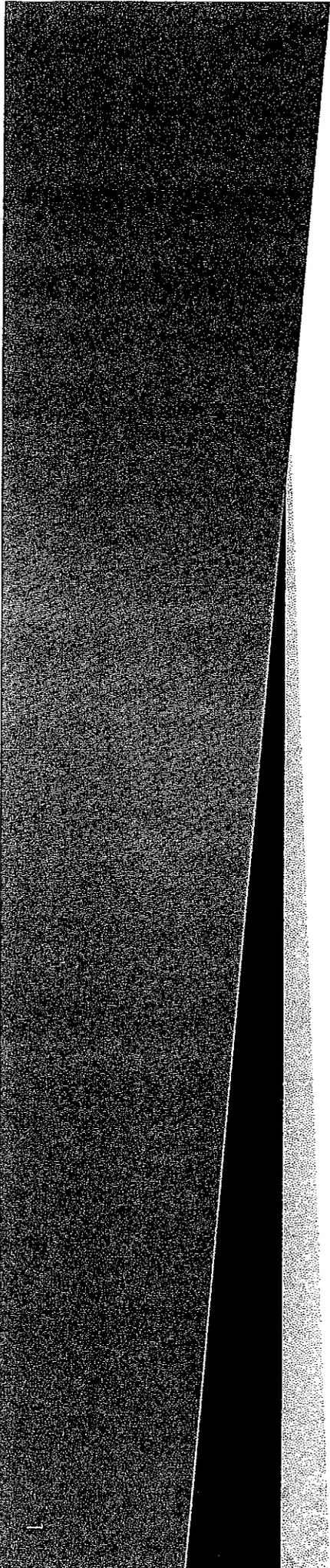
~ 0.8 miles b/wn plant  
and outfall

Estimated  
"Plant Location"



# Exhibit 3

## Dry Comal Creek and Dry Comal Creek Vineyards



# Dry Comal Creek

## ▶ Perennial Pond

- Aquatic Life
- Water for Cattle
- Water for Wildlife
- Sits atop of Recharge Zone from which our wells tap into water for irrigating crops and provides drinking water for personal and business uses



# The USGS Store

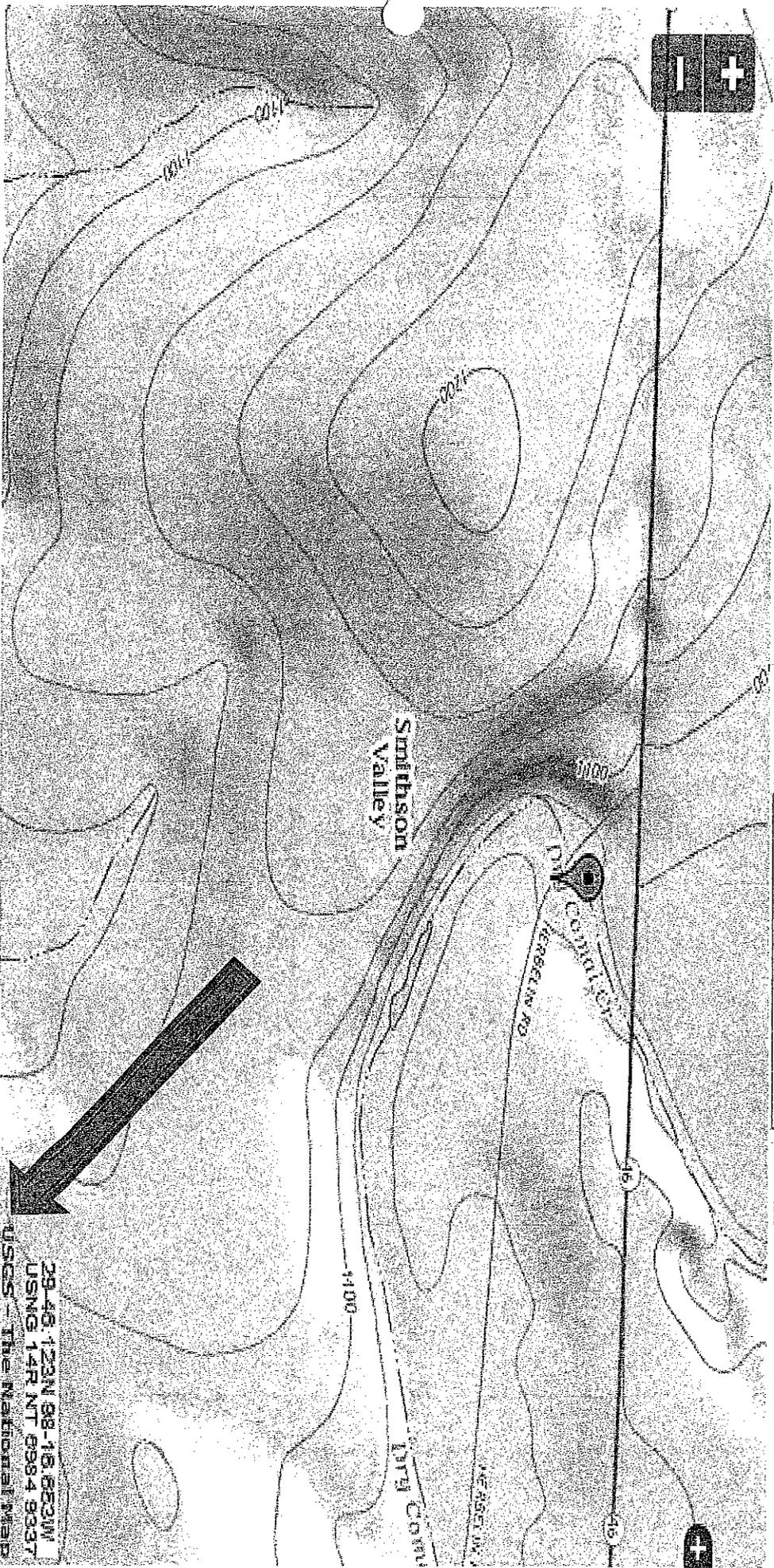
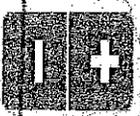
[Back to Store](#) | [About](#) | [USGS Maps](#) | [GeopDF Maps](#) | [US Topo Maps](#) | [Historical Topographic Maps](#)

## Map Locator & Downloader

[Explore Historical Topo Map Viewer](#)

Don't see the Map Locator & Downloader? [Help](#) | Having trouble? Call: 1-888-ASK-USGS (1-888-275-8747, Select

Search:

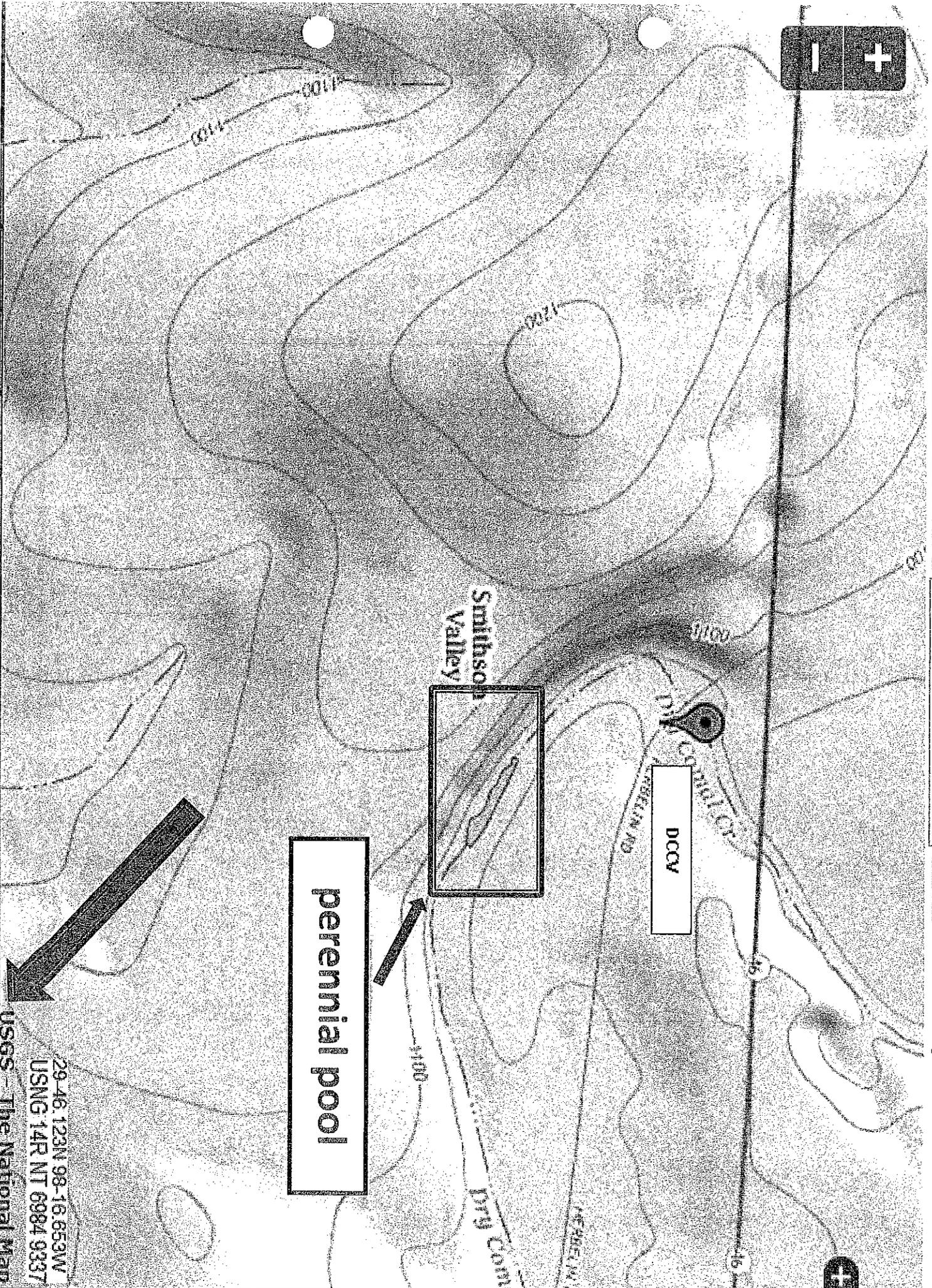
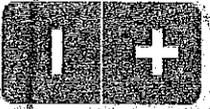


29 46 123N 98 16 853W  
USNG 14R NT 8984 8337  
USGS - The National Map

Search: 1741 herbin rd, new braunfels

Address or Place

Go Search Help

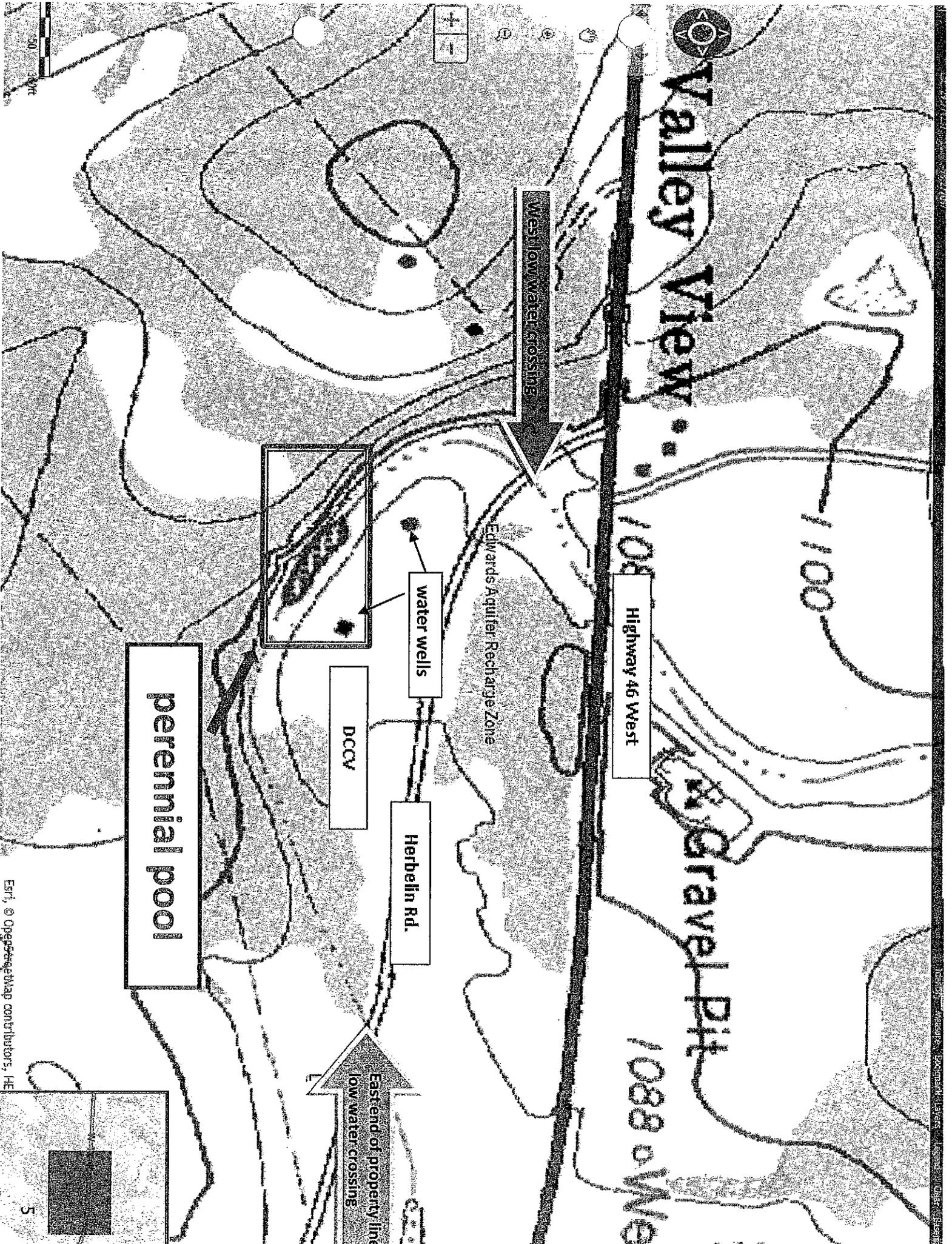


Smithson Valley

DCCV

perennial pool

29-46.123N 98-18.653W  
USNG 14R NT 6984 9337  
USGS - The National Map



Valley View

108 Highway 46 West

1100

Gravel Pit

1088

West low water crossing

Edwards Aquifer Recharge Zone

water wells

DCCV

Herbelin Rd.

perennial pool

East end of property line low water crossing



Zoom To Scale:

Select a scale:



Measure



Bookmarks

Layers

Color

Refresh

Highway 46 West

Herbelin Rd.

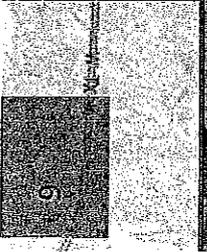
DCCV

Edwards Aquifer Recharge Zone

perennial pool

West low water crossing

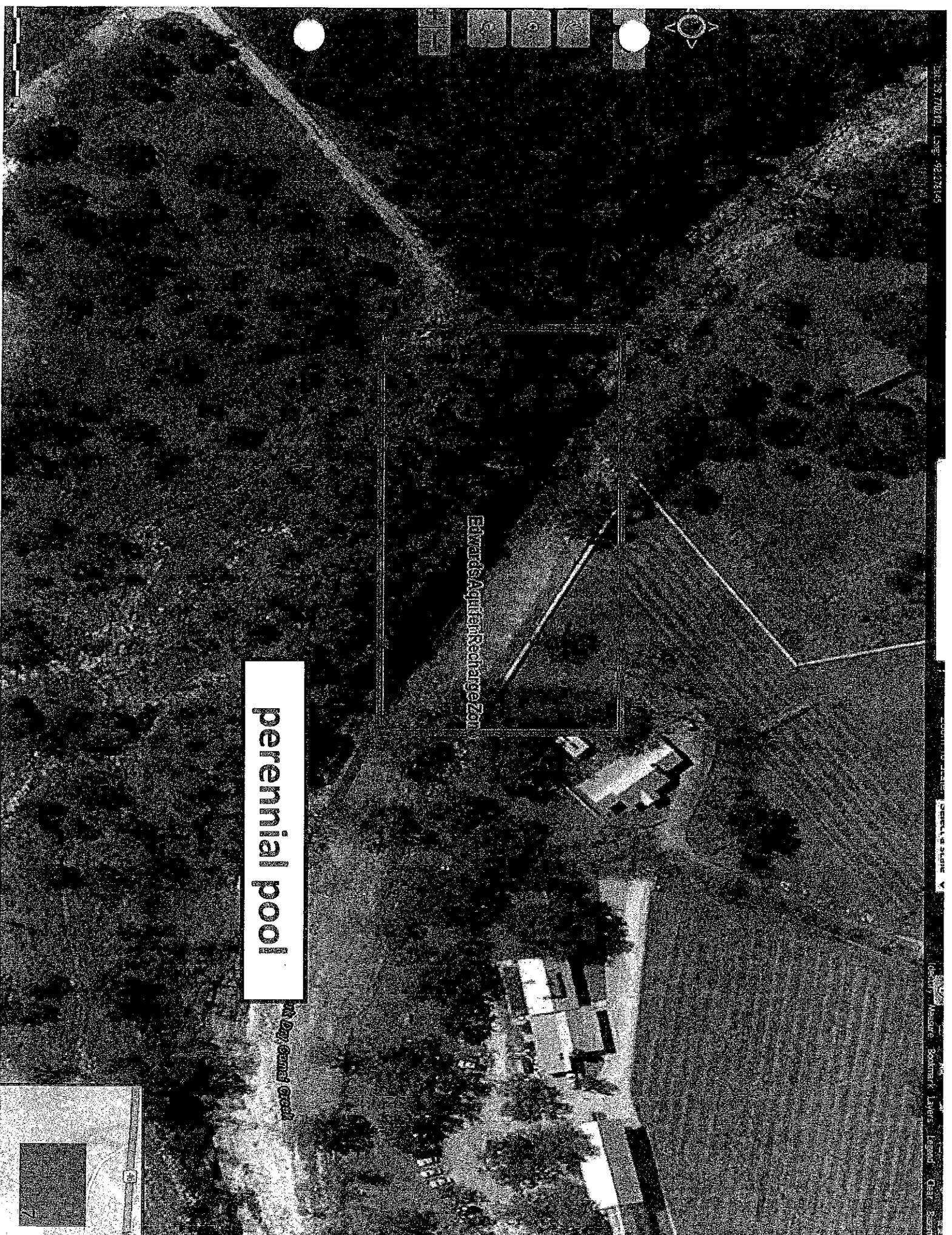
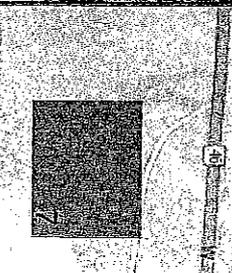
East end of property line & low water crossing

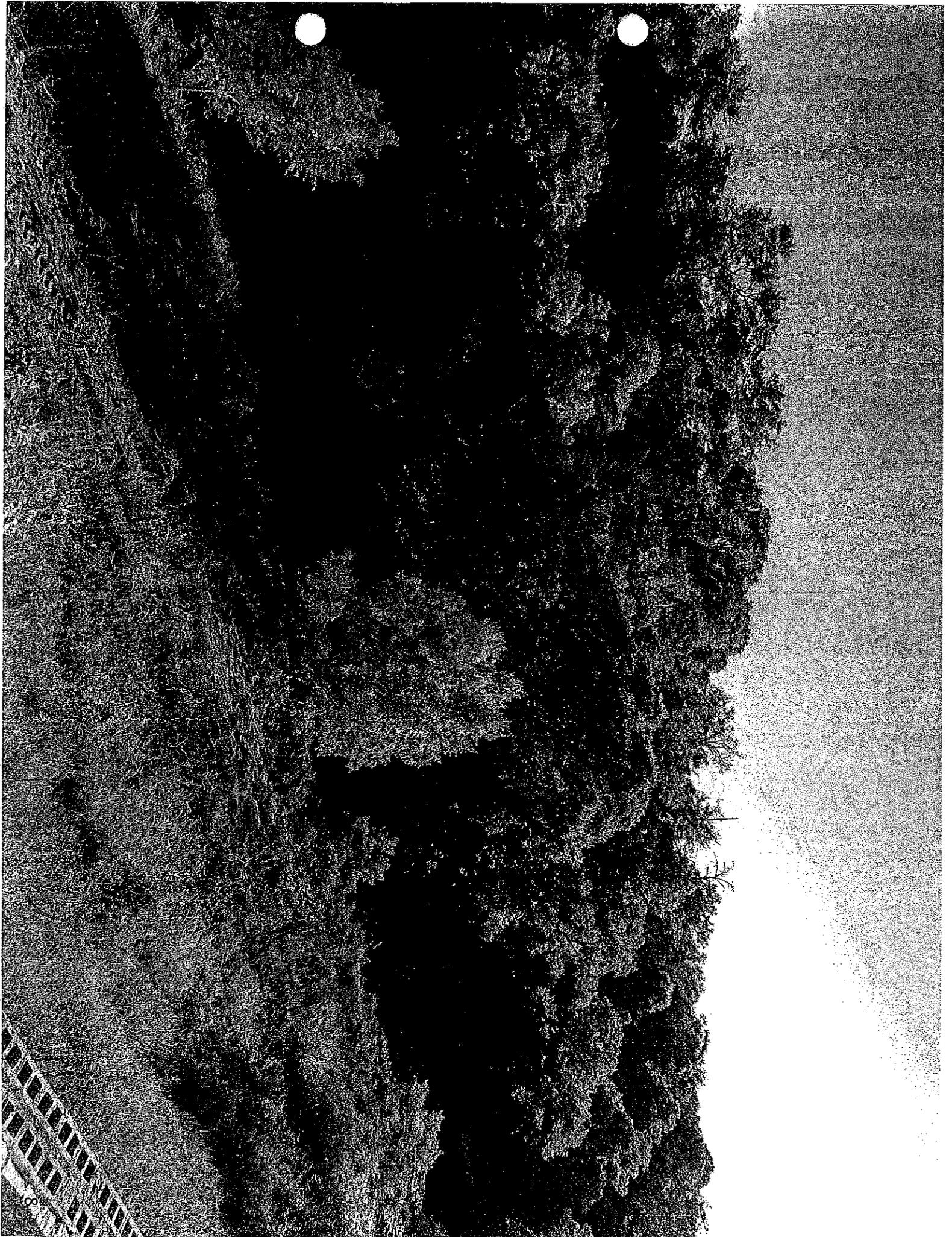


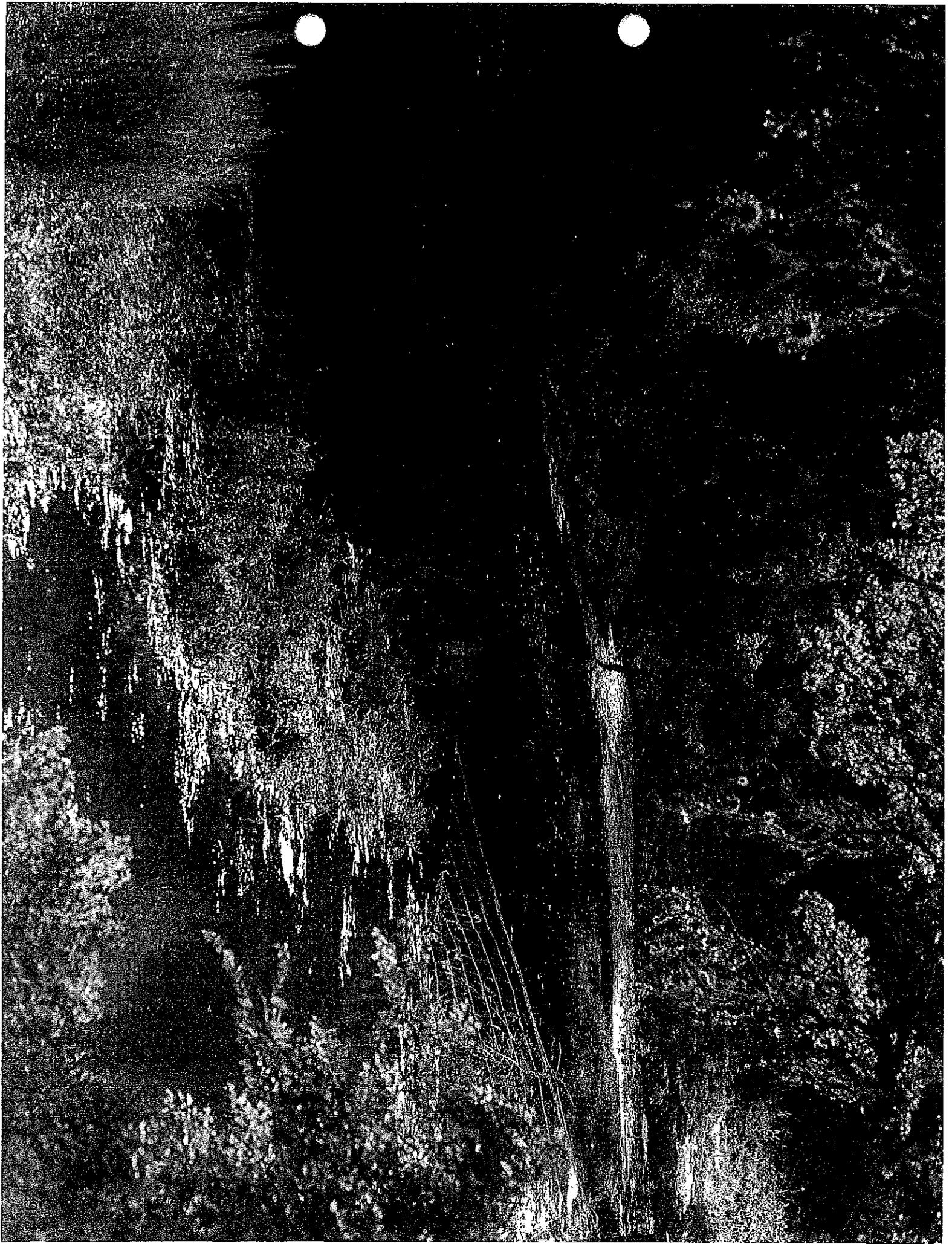
Edwards Aquifer Recharge Zone

perennial pool

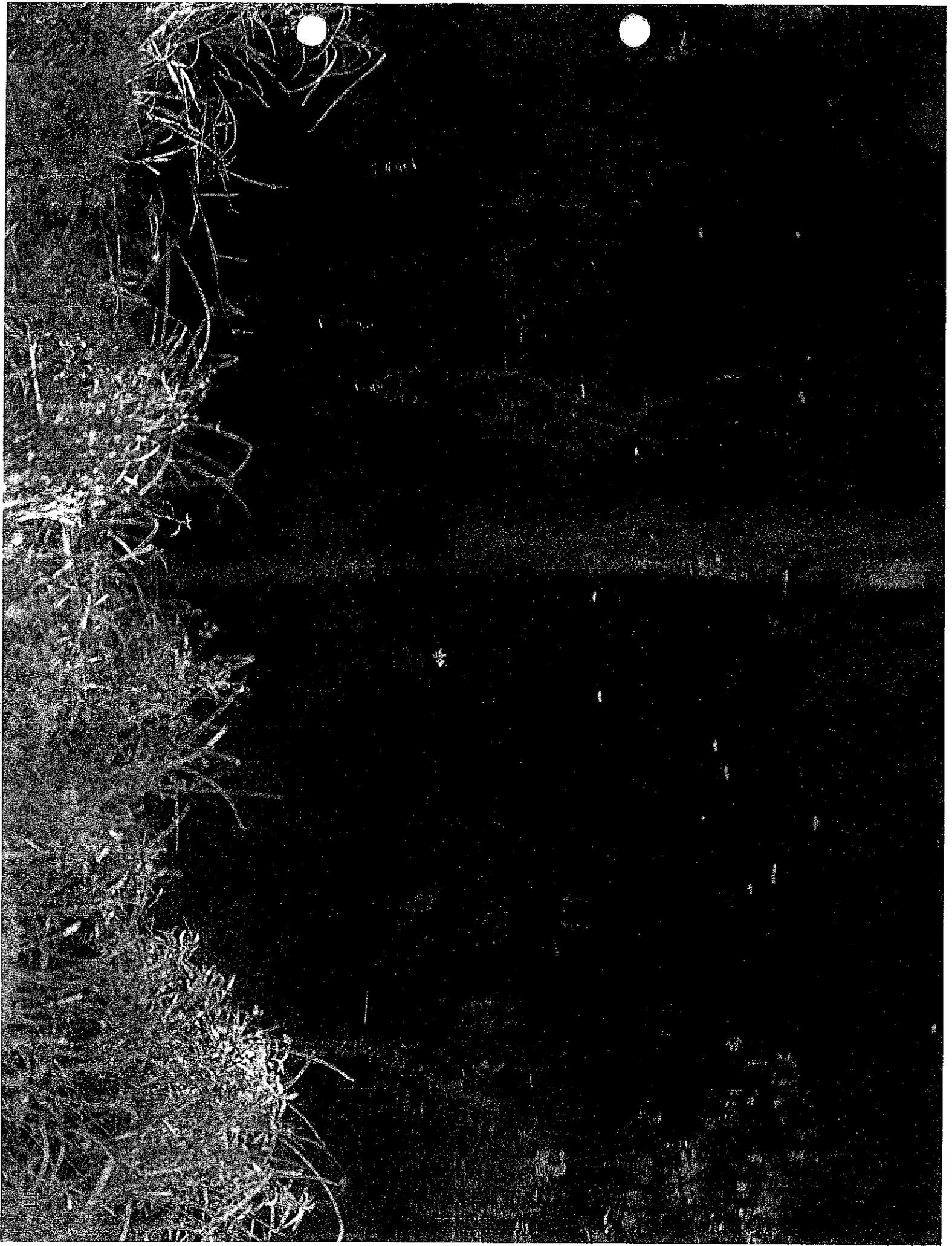
dry sand creek



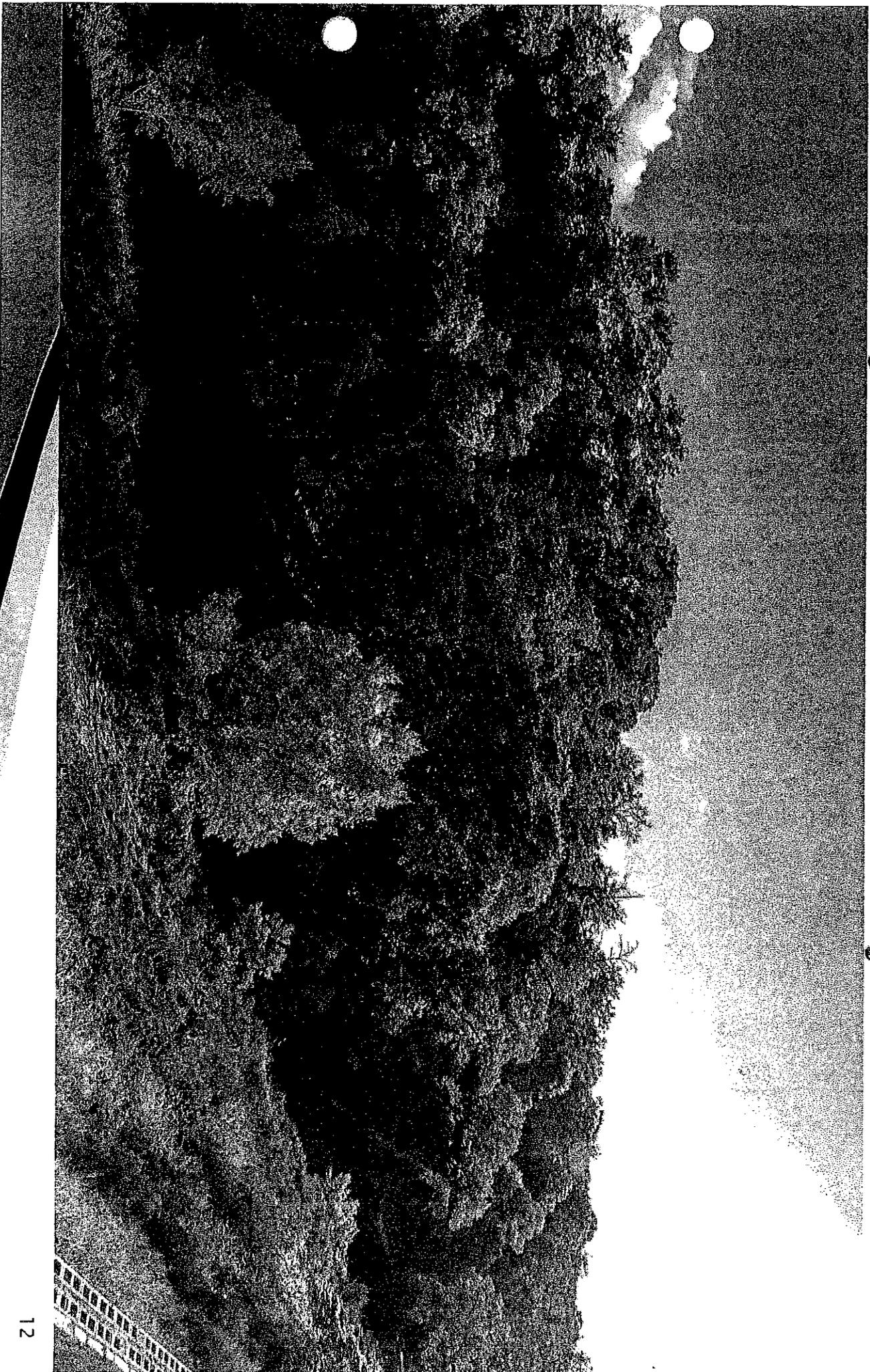


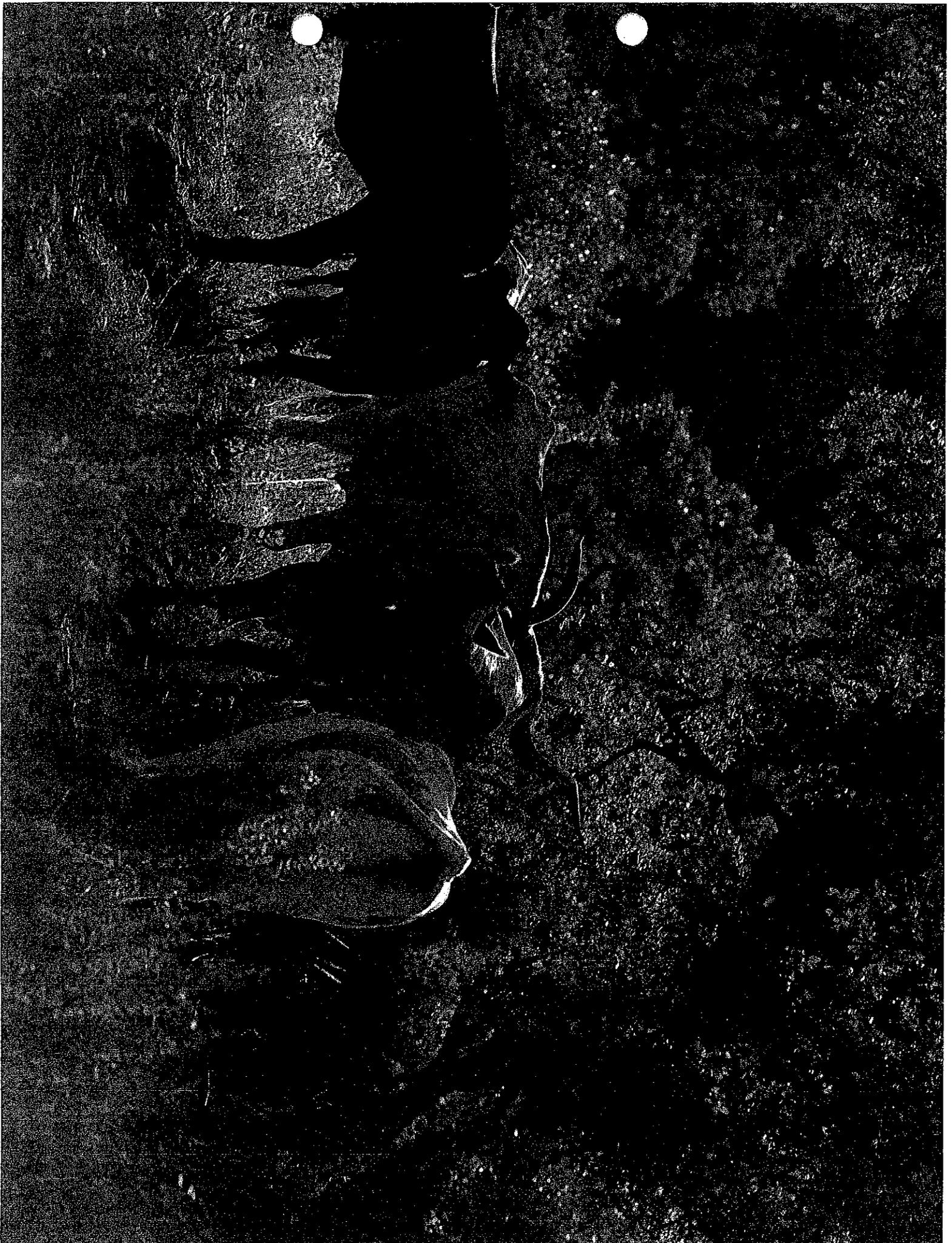






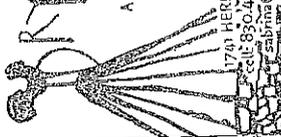
# ***Panoramic View of Dry Comal Creek @ Dry Comal Creek Vineyards***







Dry Comal Creek Vineyards and Winery  
Sabrina Houser Amaya  
1741 Herbelin Rd.  
New Braunfels, TX 78132



**DRY COMAL CREEK**  
VINEYARDS  
AND WINERY  
Sabrina Houser  
Manager

1741 HERBELIN ROAD • NEW BRAUNFELS • TEXAS 78132  
Tel: 830.456.2787 tele: 830.885.4076 fax: 830.885.4124  
www.drycomalcreek.com  
mailto:info@drycomalcreek.com

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2015 OCT 12 PM 3:38

CHIEF CLERK'S OFFICE

Office of the Chief Clerk TCEQ  
12100 Park 35 Circle, Bldg F  
Austin, TX 78753

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:17 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** franklin@drycomalcreek.com [mailto:franklin@drycomalcreek.com]  
**Sent:** Sunday, October 11, 2015 8:09 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/16/15*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Franklin Houser

**E-MAIL:** [franklin@drycomalcreek.com](mailto:franklin@drycomalcreek.com)

**COMPANY:** Dry Comal Creek Vineyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8304574377

**FAX:**

**COMMENTS:** I, Franklin Houser, resident at and owner of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001 I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons. A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant

*MWD*

and outfall sites (See Exhibit 1) Result Impacts Vineyard Operations a) Increased waste water discharge into the Edwards Aquifer Contributory and Recharge Zones b) Result in eutrophication – an excess of nutrients (i.e., Phosphorous), producing an increase in microorganisms and algae and depression in oxygen i) Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production ii) We routinely sample our soil to ensure that the proper nutrients and their levels are present. iii) Disruption in water source increases need for alternative fertilizer treatments which leech into the water source. B) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1) Result Impacts Public Water Supply and Ability for Business to Remain in Business 1) Increased the likelihood of E-Coli in the water supply which is used in irrigation of a food product and for public drinking water for our customers and employees in our business 2) The winery is required by the Comal County Health Department to test our water for E-Coli a) Upon positive results, the winery will be shut down immediately until it's source is identified and remedied. b) A shut-down due to this identified E-Coli contamination will essentially put us out of business because by the onus is placed on Dry Comal Creek Vineyards to identify the source and rectify it. To do so will utilize capital monies that serve to keep the business running. Even a short-term closure will annihilate our ability to continue doing business. C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421, Result Impacts Public Water Supply and Ability for Business to Remain in Business How can pathogens enter my water? TCEQ RG-421 Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff. How can I protect my water system from contamination? TCEQ RG-421 • Properly maintain all water facilities. • Obtain a sanitary easement for each well. • Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn) • Install backflow preventers. • Maintain a minimum pressure of 35 psi at all points within the distribution system. • Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines. D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool). Result Impacts Perennial Pool a) Result in eutrophication – an excess of nutrients (i.e., Phosphorous), producing an increase in microorganisms and algae and depression in oxygen. The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review. by David L. Correll \* Abstract Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it

is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton. In summary, there remains a number of adverse affects that this Waste Water Treatment Plan will impose on downstream residents and businesses that have not been taken into consideration. Despite the fact that the permit request and supporting documentation 'meet' the intent of the regulations; TCEQ rapacious permitting process which maintains that the permittee will follow all building and monitoring requirements and that there is minimal or no long term effects is 'blue sky' thinking. While TCEQ may view my concerns as 'the sky is falling', I maintain that it's not a matter of 'if' but 'when' the sky will fall on this WWTP. While it's clear in my brief interactions with TCEQ and attendance of contested case hearings whereby the opinions of the ALJ and OPIC were wholesale disregarded and that the TCEQ will do nothing but continue to allow this WWTP permit to continue, I implore TCEQ to consider the points presented above and properly address them such that the TCEQ increases the WWTP requirements to ensure minimal degradation to the Dry Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage. Respectfully submitted:  
Franklin Houser cc: Comal County Commissioners Donna Eccleston, Commissioner Precinct 1 Scott Haag, Commissioner, Precinct 2 Kevin Webb, Commissioner Precinct 3 Jen Crownover, Commissioner, Precinct 4 Representative Doug Miller Legislator Donna Campbell

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, June 29, 2015 3:48 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [franklin@drycomalcreek.com](mailto:franklin@drycomalcreek.com) [<mailto:franklin@drycomalcreek.com>]  
**Sent:** Monday, June 29, 2015 3:44 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
940519*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Franklin Houser

**E-MAIL:** [franklin@drycomalcreek.com](mailto:franklin@drycomalcreek.com)

**COMPANY:** Dry Comal Creek Vinyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8308854076

**FAX:** 8308854076

**COMMENTS:** I request a contested case hearing in regards to this permit. I am also an affected party as a resident and business owner along the discharge route of the West Fork Dry Comal Creek. My business is surrounded on 3 sides by the West Fork of the Dry Comal Creek. The volume of and type of discharge will negatively impact my business by creating additional pollutant loading into the Edwards Aquifer Recharge Zone, on which my business and residence directly site. By allowing this permit TCEQ is creating additional

*MW*

pollutant loading, including bacteria such as E-Coli. As a business I am required to submit a water sample to the County Health Department. If E-Coli is present, my business is immediately shut down. The onus and the financial impact is then upon Dry Comal Creek Vineyards to locate its source and correct it. How can I correct discharge that is allowed by the TCEQ? My business is also tourist attraction and pays alot of tax dollars to Comal County...while TCEQ may not care about this, I'm sure the City of New Braunfels will be eager to address the impact on tourism dollars when bacteria infected water flows into the Comal River. In addition, the property has perennial ponds which the applicant nor the TCEQ have taken into consideration. There must be an Environmental Evaluation conducted prior to the approval of this very dangerous permit is allowed.

TCEQ Public Meeting Form  
June 18, 2015

14

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: FRANKLIN Hodges ETX 78132

Mailing Address: 1741 Hebelin Rd NW TX

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

City/State: New Braunfels Zip: 78132

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

Email: None

Phone Number: 830-456-4377

• 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.

14

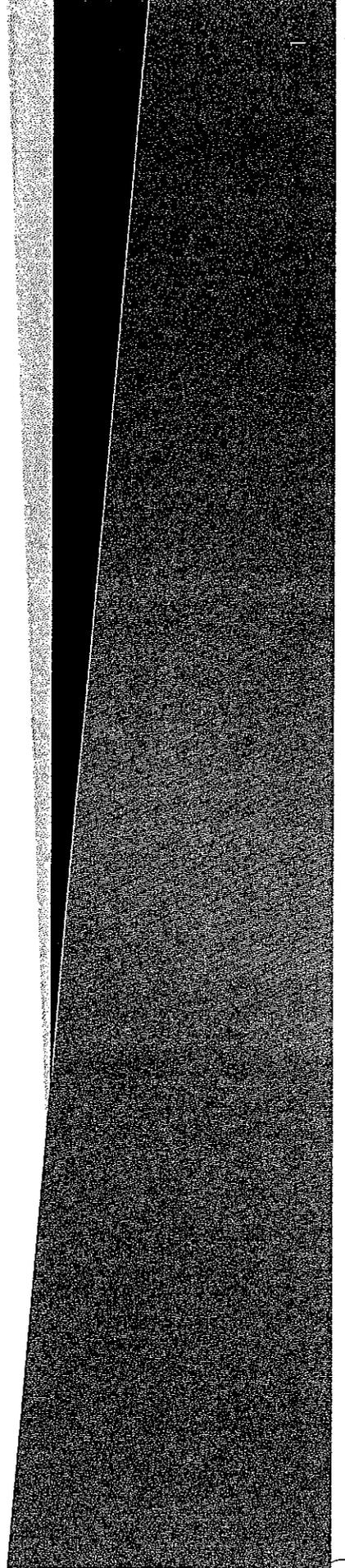
RECEIVED

JUN 18 2015

AT PUBLIC MEETING

# Dry Comal Creek

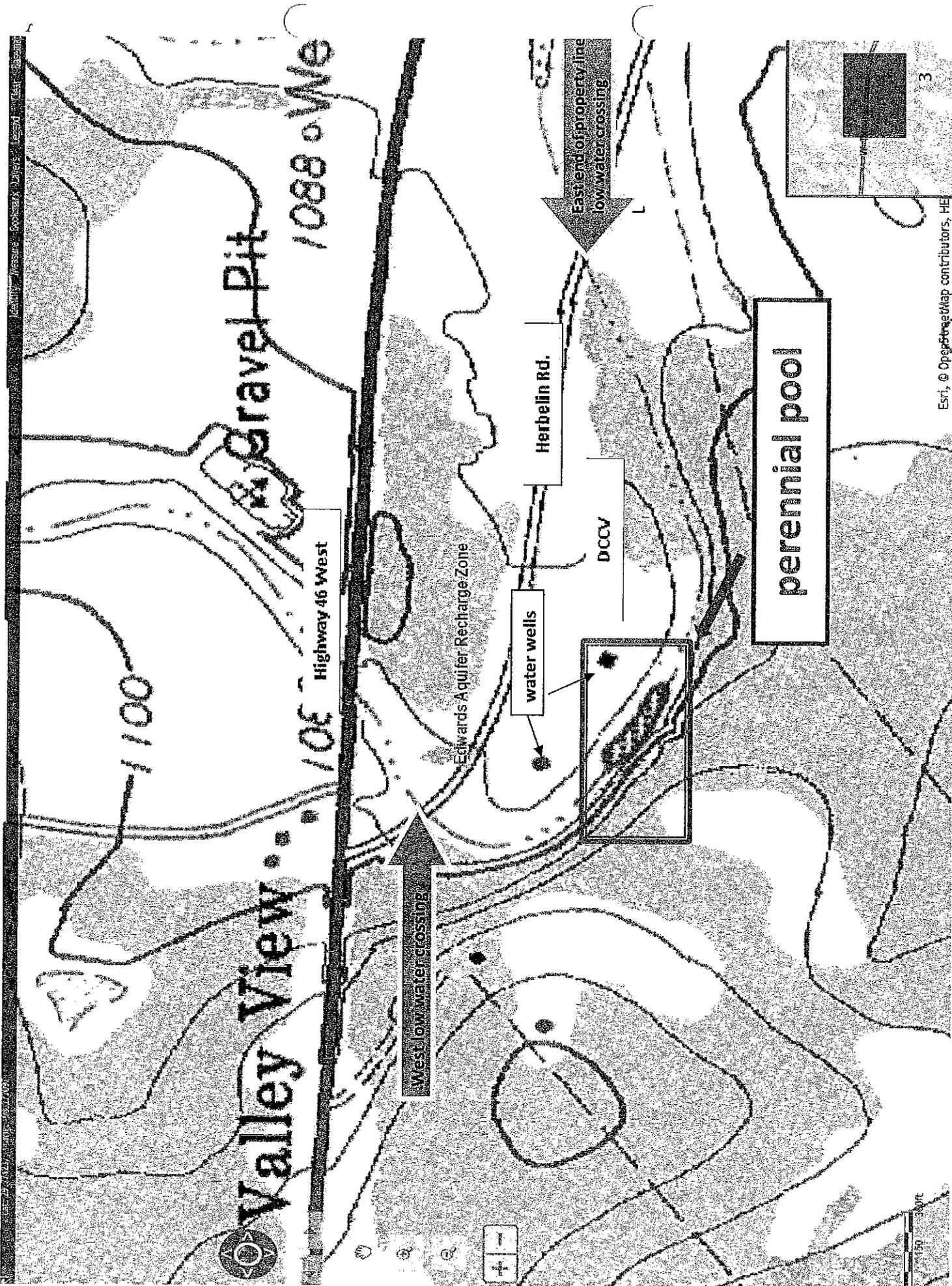
and Dry Comal Creek Vineyards



me

# Dry Comal Creek

- ▶ Perennial Pond
  - Aquatic Life
  - Water for Cattle
  - Water for Wildlife
  - Sits atop of Recharge Zone from which our wells tap into water for irrigating crops and provides drinking water for personal and business uses



Valley View

Gravel Pit

1088

Highway 46 West

Edwards Aquifer Recharge Zone

Herbelin Rd.

water wells

DCCV

perennial pool

West low water crossing

East end of property line low water crossing

0 100 200 FT

Q

Zoom To Scale: Select a scale



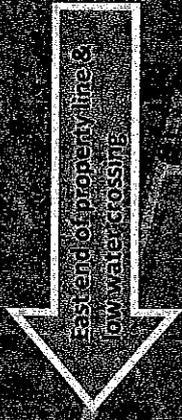
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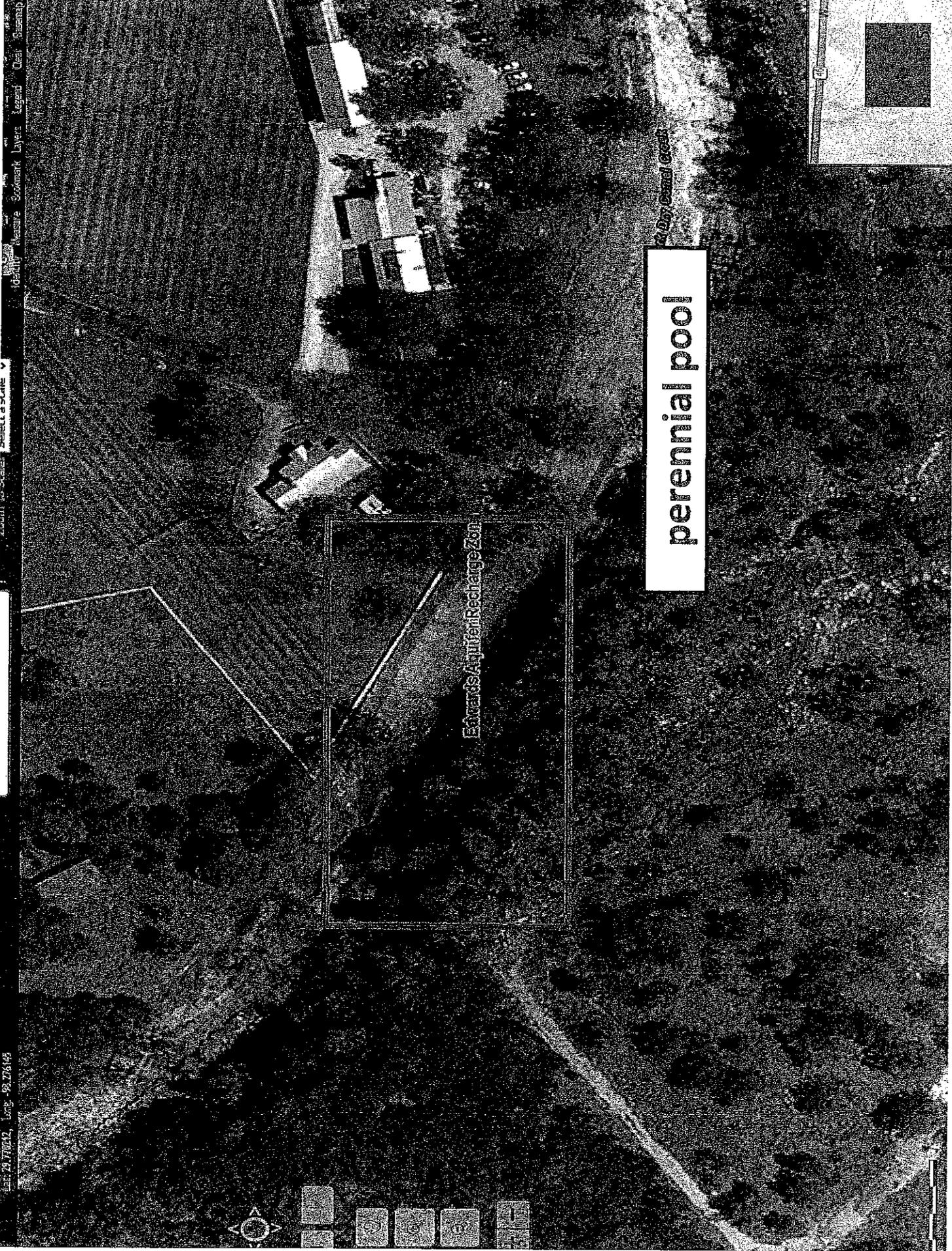
Herbelin Rd.

DCCV

Edwards Aquifer Recharge Zone

perennial pool





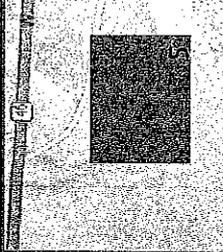
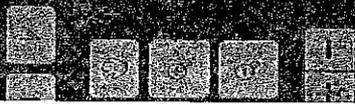
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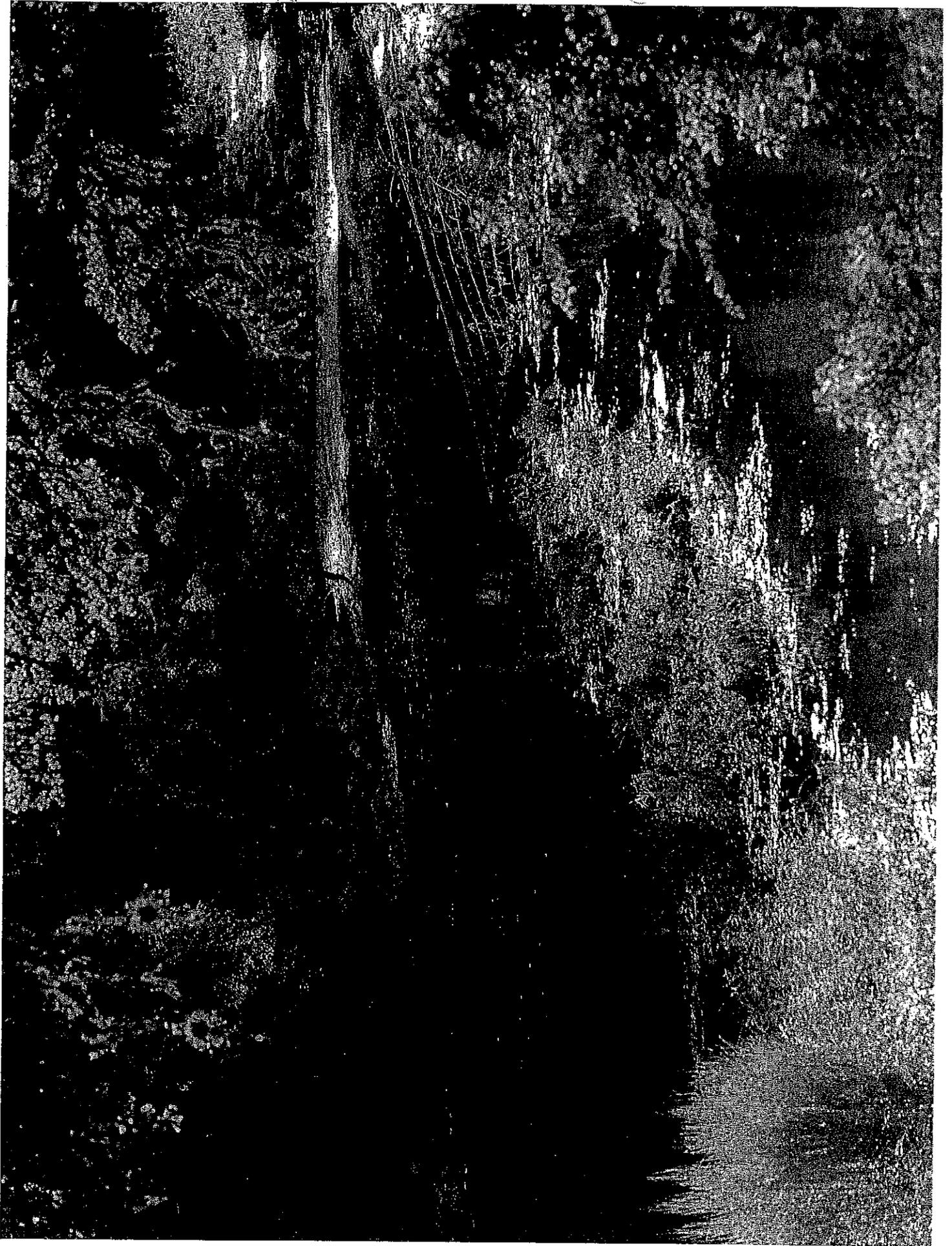
Identity Measure Scalemark Layers Legend Clear Screen

Edwards Aquifer Recharge Zone

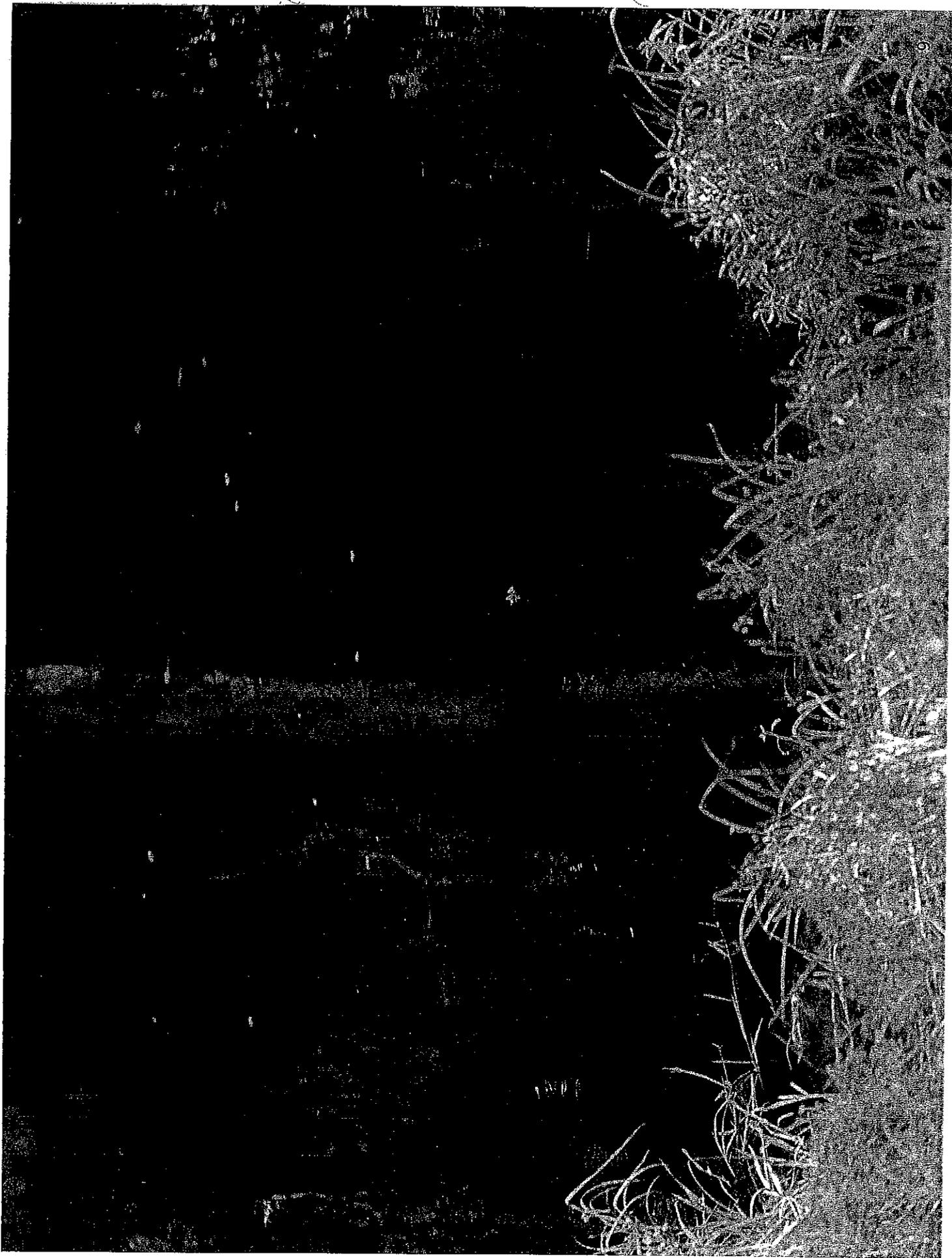
perennial pool

City Canal Co.

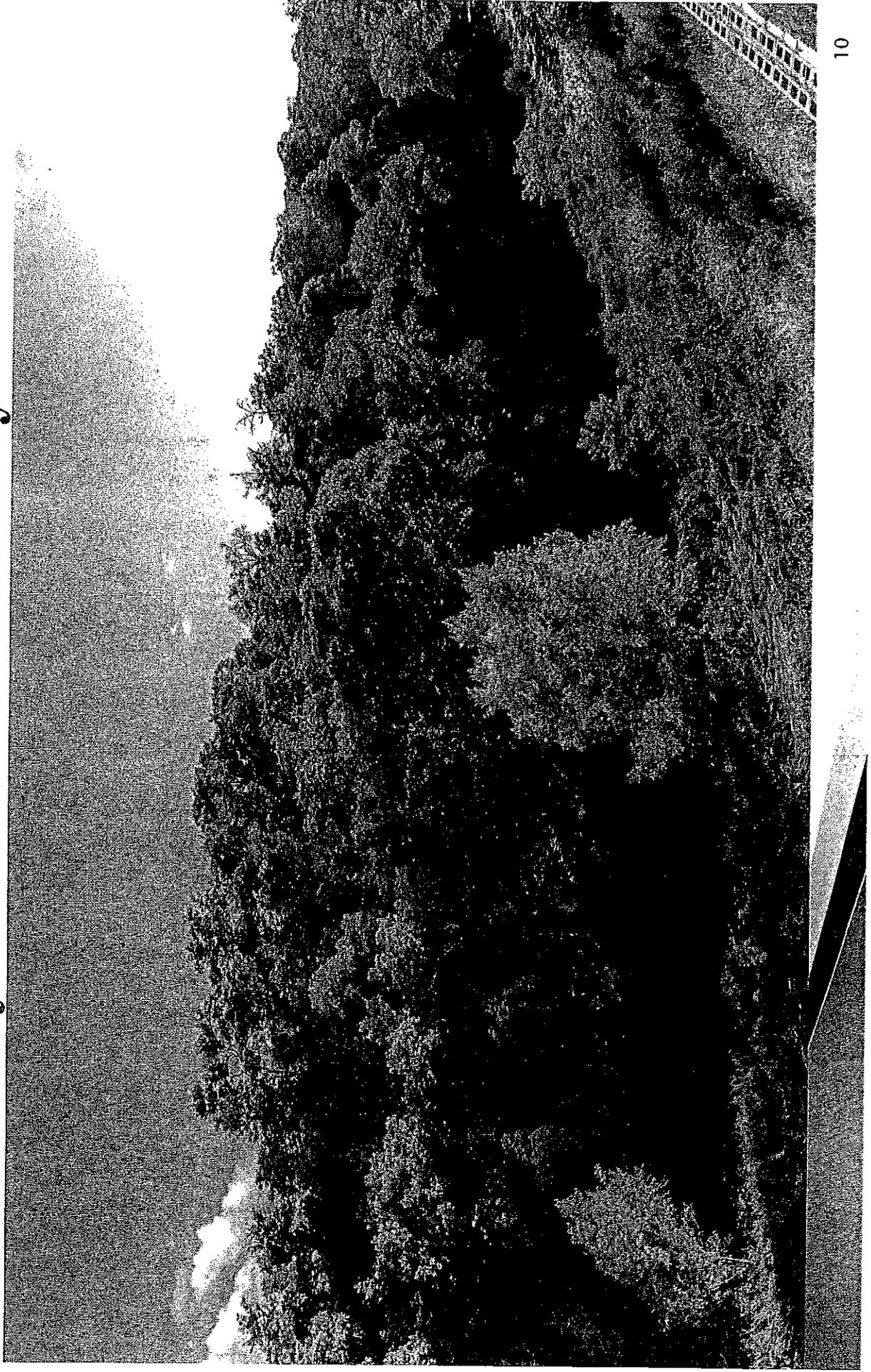


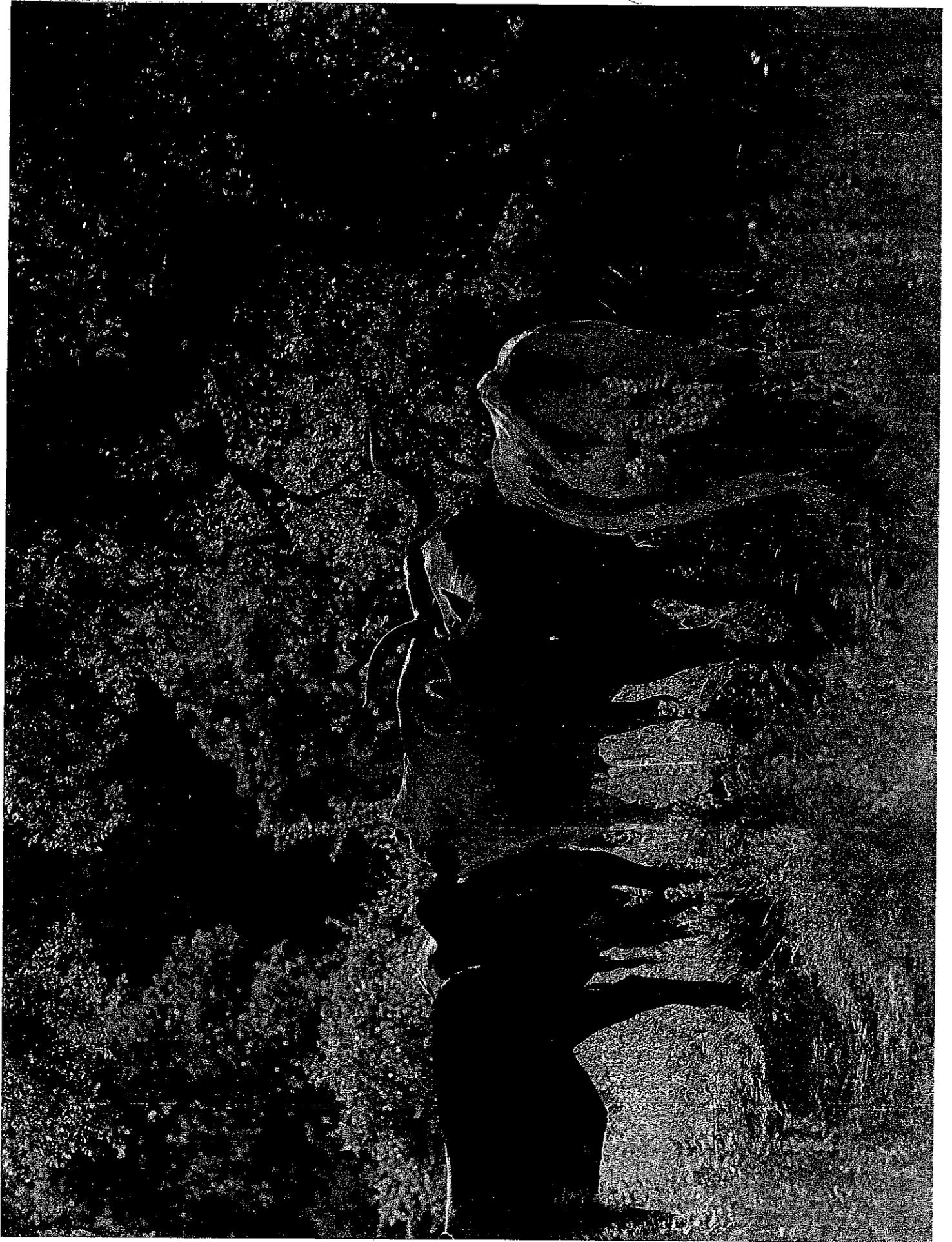


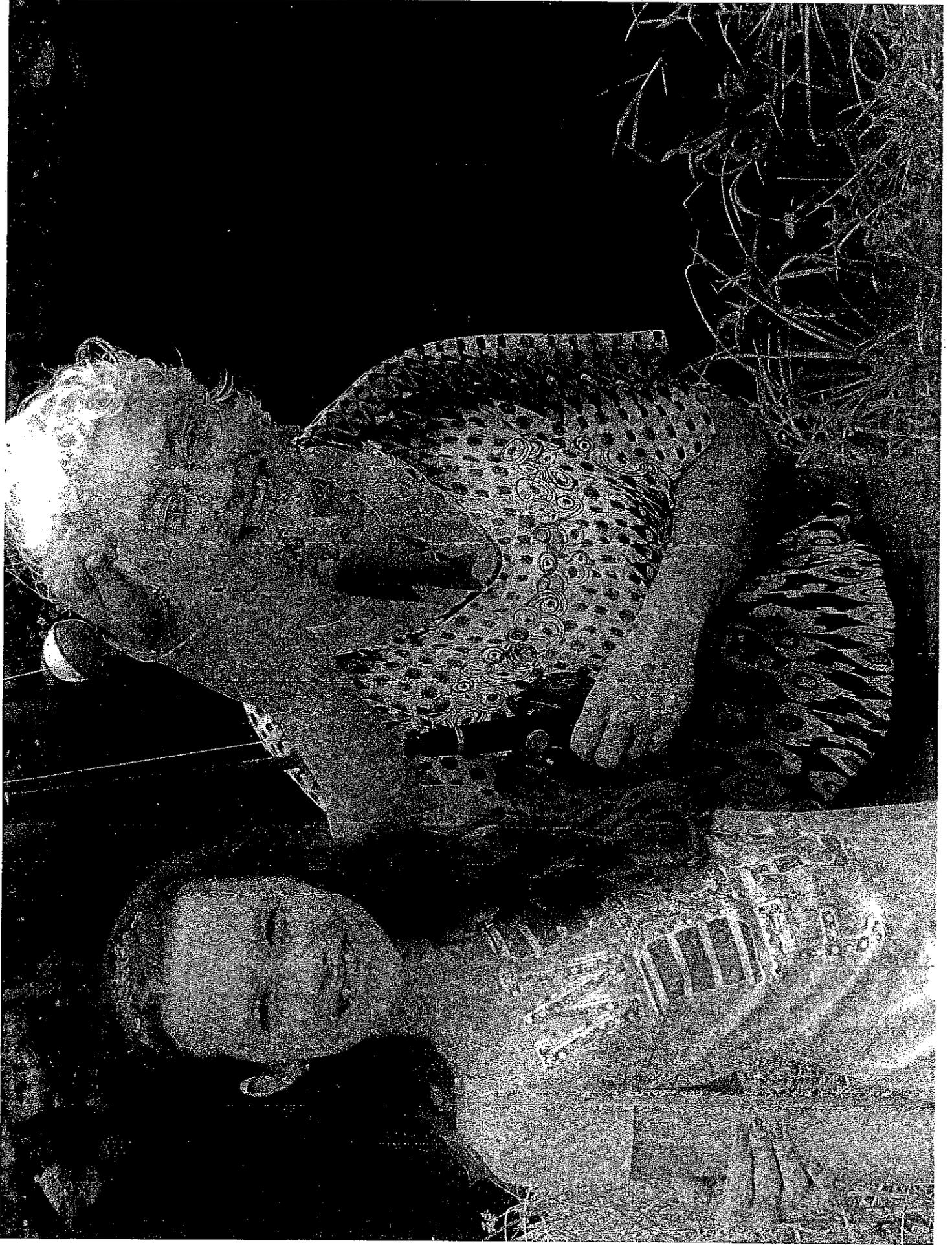


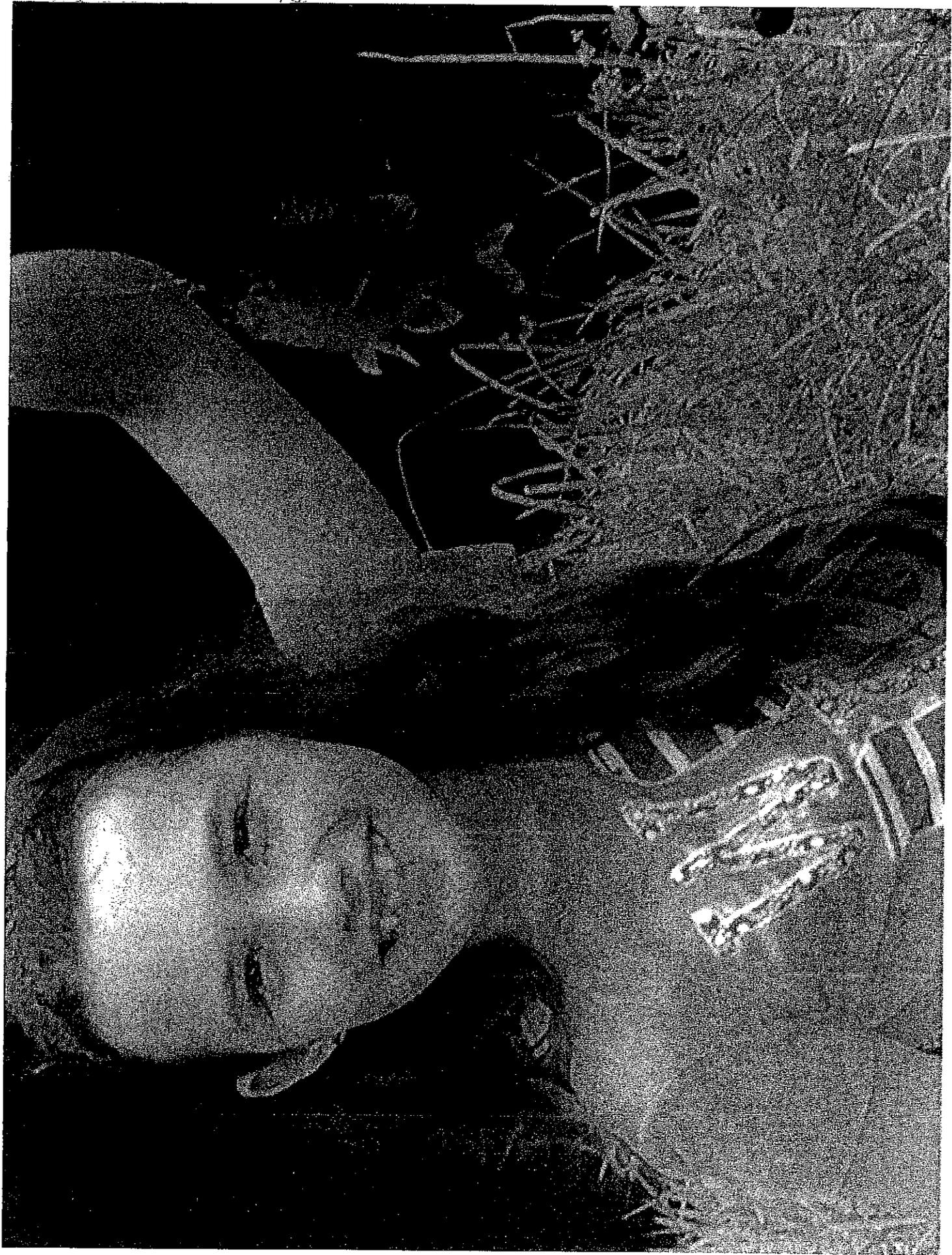


# Panoramic View of Dry Comal Creek @ Dry Comal Creek Vineyards









# Public Not Given

## Access to Documents for this Meeting

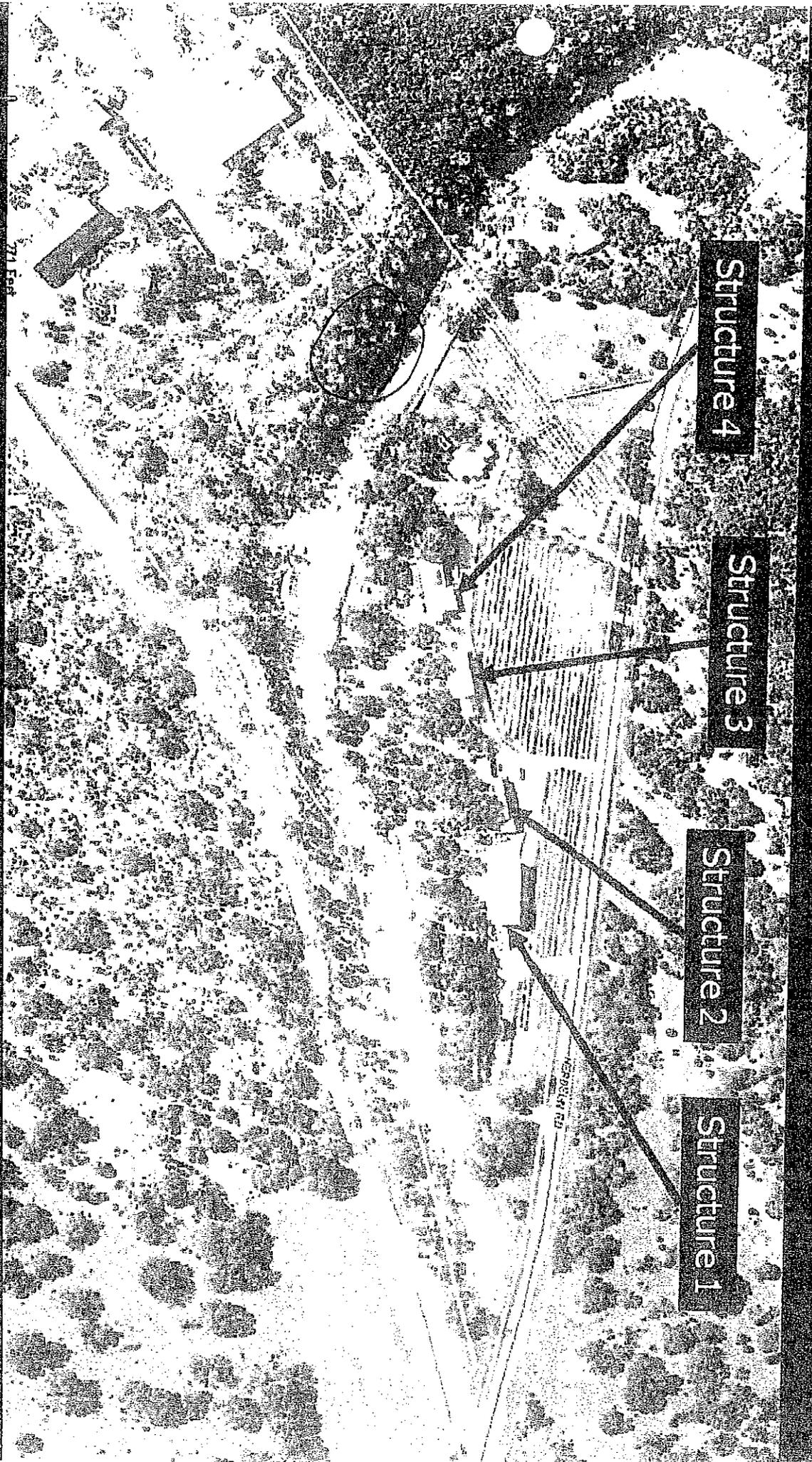
- ▶ **May 11, 2015 Letter from TCEQ to Randolph Todd, LLC requiring them to file 30 days prior to June 18, 2015 at Bulverde/Spring Branch Library the following:**
  - **Application with Revisions**
  - **TCEQ ED Comments**
  - **Draft Permit**
- ▶ **Visited library on 4 occasions and on each occasion, the documents were not on file**
  - ▶ **6/10/15**
  - ▶ **6/13/15**
  - ▶ **6/16/15**
  - ▶ **6/17/15**

# Public Not Given Access to Documents for this Meeting

- ▶ Multiple attempts to obtain documents, including a trip to Austin TCEQ office. Told the following verbally and emails from TCEQ staff.
- ▶ *“If you want a copy you have to contact petitioner directly.”*
- ▶ *“You have to make a request of the regional office.” (when we did make regional request, this is what we were told via email) “She said if a member of the region office requested the updates she would email them. I spoke with [REDACTED] from the Wastewater section and she said she would request however her supervisor, [REDACTED] called me back and said that she has a policy to not let her investigators request information rather that must go through Public Information Office due to the large volume and that it does not get counted as investigator billable time.”*
- ▶ *“I decided to refer these concerns to both Water Quality and Edwards management, since it seems to involve both programs.” (no response from anyone at TCEQ!)*
- ▶ *“We cannot locate the documents you are looking for.”*
- ▶ **Public Information Request submitted 6/8/15**

# **Public Not Given Access to Documents for this Meeting**

- ▶ **How can this meeting be held without granting the public the right to review all documents in a timely manner?**
- ▶ **How can TCEQ make a decision, despite this public meeting, without the public having access to required documents for pre-review?**



Structure 4

Structure 3

Structure 2

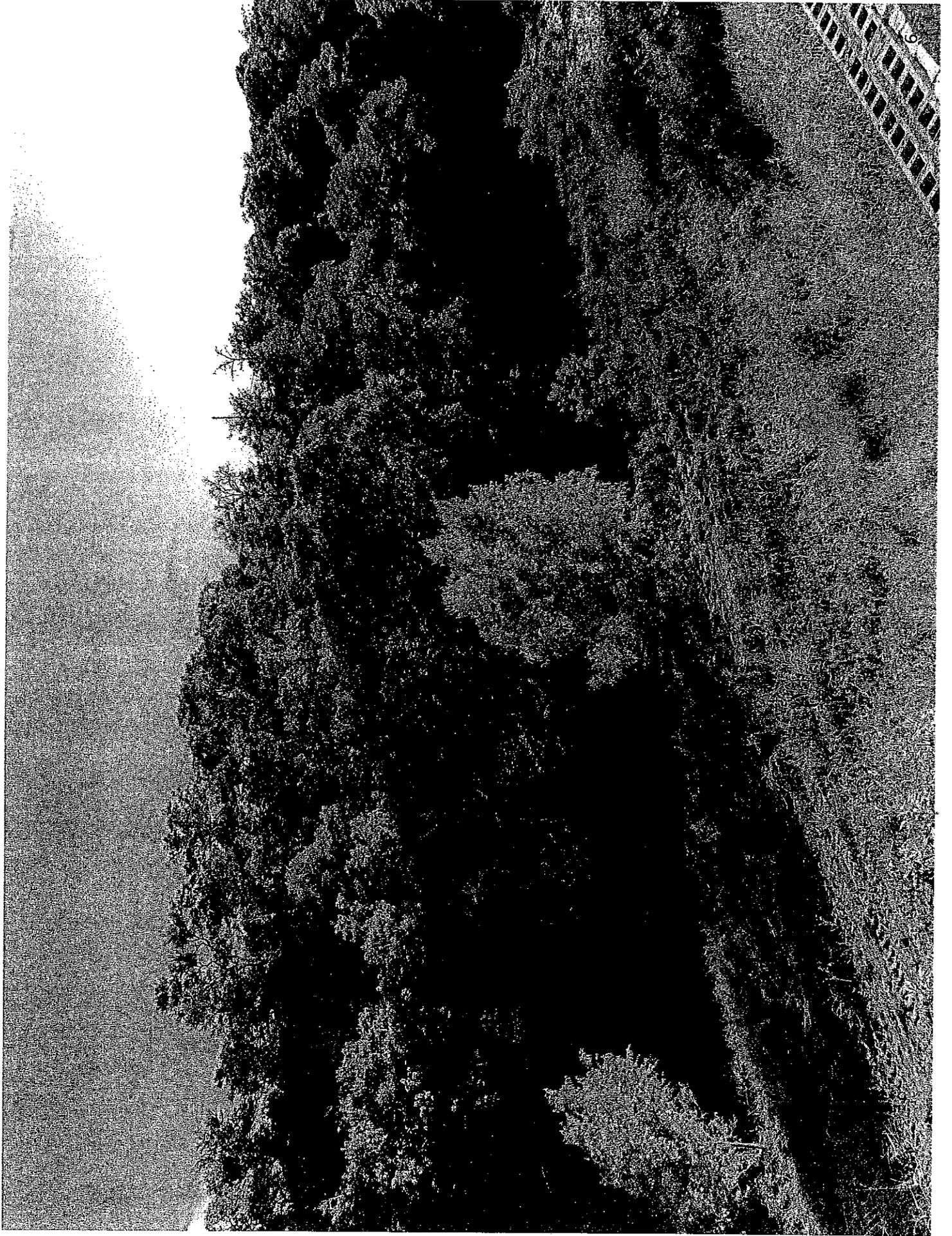
Structure 1

Structures in Violation

- Structure 1 - Commercial Storage and Office Building
- Structure 2 - Commercial Winery Building
- Structure 3 - Commercial Bathroom Building
- Structure 4 - Commercial Wine Tasting Building

Houser Property

18.598 acres being a portion of the remainder of the 26.259 acre tract of land described in Document 200706051879 of the Official Public Records of Comal County Texas



**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, January 28, 2015 8:53 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** [franklin@drycomalcreek.com](mailto:franklin@drycomalcreek.com) [<mailto:franklin@drycomalcreek.com>]  
**Sent:** Tuesday, January 27, 2015 7:42 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/20/14*

**REGULATED ENTITY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Franklin Houser

**E-MAIL:** [franklin@drycomalcreek.com](mailto:franklin@drycomalcreek.com)

**COMPANY:** Dry Comal Creek Vineyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8308854076

**FAX:**

**COMMENTS:** As a business owner (Dry Comal Creek Vineyards), which is bordered by the Dry Comal Creek, I was not notified of this permit. I disagree with this permit moving forward without some of the flooding challenges we face are directly addressed and/or changed by the County and this developer.

*FW*

# Request for Contested Case Hearing

## Permit # WQ0015314001

MWD  
9/16/05

I, Sabrina Houser Amaya, resident at and owner of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001

I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons.

A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Vineyard Operations

- a) Increased waste water discharge into the Edwards Aquifer Contributory and Recharge Zones
- b) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen
  - i) Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production
  - ii) We routinely sample our soil to ensure that the proper nutrients and their levels are present.
  - iii) Disruption in water source increases need for alternative fertilizer treatments which leech into the water source.

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2015 OCT 12 PM 3:10  
TELEPHONIC

B) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1)

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

- 1) Increased the likelihood of *E-Coli* in the water supply which is used in irrigation of a food product and for public drinking water for our customers and employees in our business
- 2) The winery is required by the Comal County Health Department to test our water for E-Coli
  - a) Upon positive results, the winery will be shut down immediately until it's source is identified and remedied.
  - b) A shut-down due to this identified E-Coli contamination will essentially put us out of business because by the onus is placed on Dry Comal Creek Vineyards to identify the source and rectify it. To do so will utilize capital monies that serve to keep the business running. Even a short-term closure will annihilate our ability to continue doing business.

REVIEWED  
OCT 12 2015  
BY [Signature]

C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421,

### Result Impacts Public Water Supply and Ability for Business to Remain in Business

*How can pathogens enter my water?* TCEQ RG-421

*Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff.*

# Request for Contested Case Hearing Permit # WQ0015314001

*How can I protect my water system from contamination?* TCEQ RG-421

- Properly maintain all water facilities.
- Obtain a sanitary easement for each well.
- Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn)
- Install backflow preventers.
- Maintain a minimum pressure of 35 psi at all points within the distribution system.
- Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines.

D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool).

### **Result Impacts Perennial Pool**

- a) Result in eutrophication – an excess of nutrients (i.e., Phosphorous), producing an increase in microorganisms and algae and depression in oxygen.

*The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review.* by David L. Correll \*

### **Abstract**

*Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton.*

In summary, there remains a number of adverse affects that this Waste Water Treatment Plan will impose on downstream residents and businesses that have not been taken into consideration. Despite the fact that the permit request and supporting documentation 'meet' the intent of the regulations; TCEQ rapacious permitting process which maintains that the permittee will follow all building and monitoring requirements and that there is minimal or no long term effects is 'blue sky' thinking. While TCEQ may view my concerns as 'the sky is falling', I maintain that it's not a matter of 'if' but 'when' the sky will fall on this WWTP.

While it's clear in my brief interactions with TCEQ and attendance of contested case hearings whereby the opinions of the ALJ and OPIC were wholesale disregarded and that the TCEQ will do nothing but continue to allow this WWTP permit to continue, I implore TCEQ to consider the points presented above and properly address them such that the TCEQ increases the WWTP requirements to ensure minimal degradation to the Dry

# **Request for Contested Case Hearing**

## **Permit # WQ0015314001**

Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage.

Respectfully submitted:

Sabrina Houser Amaya

cc:

Comal County Commissioners

Donna Eccleston, Commissioner Precinct 1

Scott Haag, Commissioner, Precinct 2

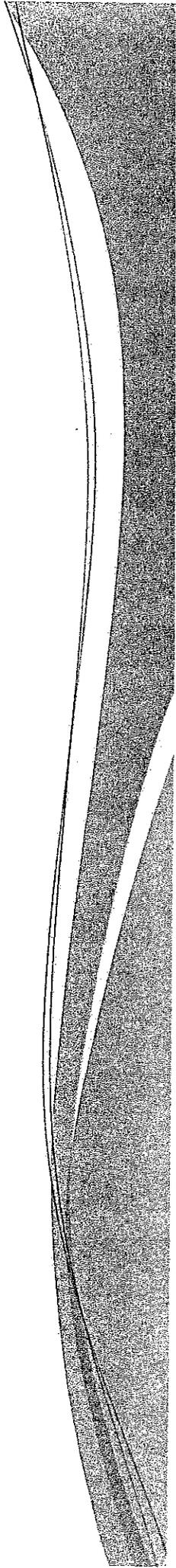
Kevin Webb, Commissioner Precinct 3

Jen Crownover, Commissioner, Precinct 4

Representative Doug Miller

Legislator Donna Campbell





**Exhibit 2**  
**Dry Comal Creek**

# West Fork Dry Comal Creek Watershed

Proposed Treatment Plant

★ Dry Comal Creek Vineyard

Normal Condition

Wet Condition

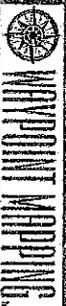


**Legend**

- USGS Elevation Contours
- USGS Streamflow
- FEMA FIRM Q3
- 1% Flood Zone (100 year)
- Aquifer Zones
- Drepana Area (Contributing Zone)
- Roadway Zone
- Azotian Zone

USGS Streamflow

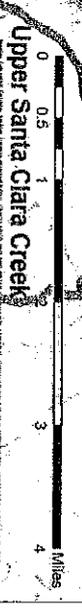
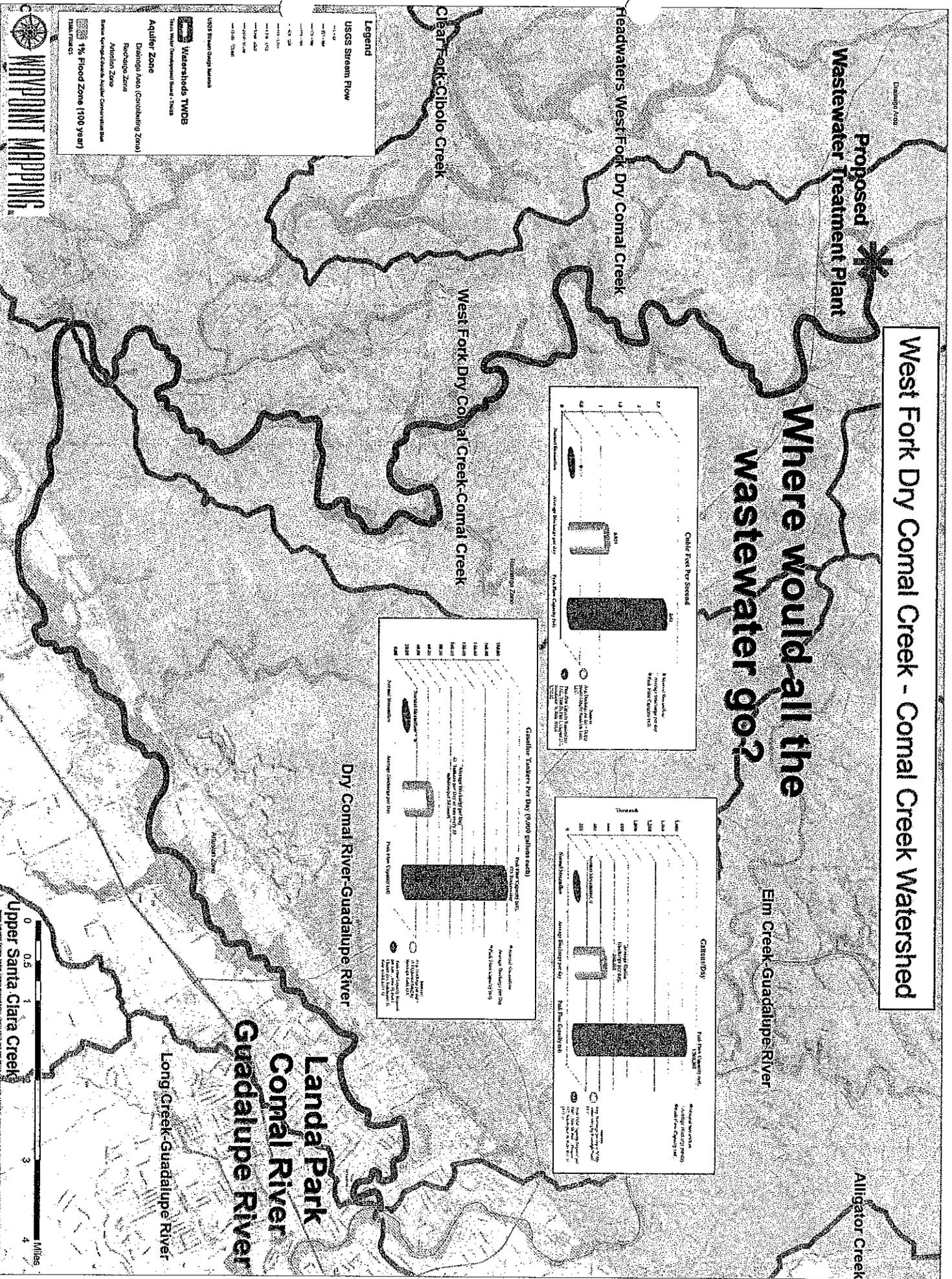
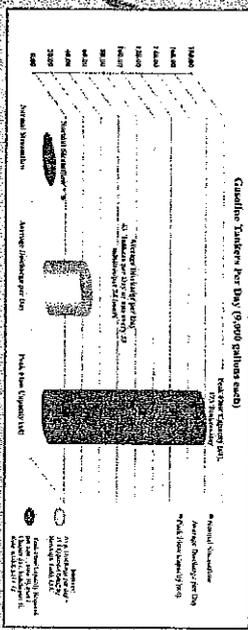
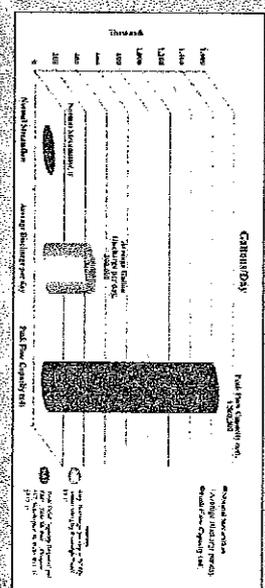
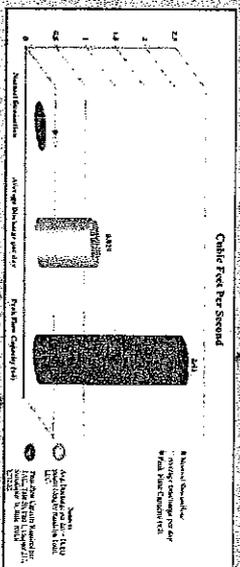
- 1000
- 800
- 600
- 400
- 200
- 0
- 200
- 400
- 600
- 800
- 1000



# West Fork Dry Comal Creek - Comal Creek Watershed

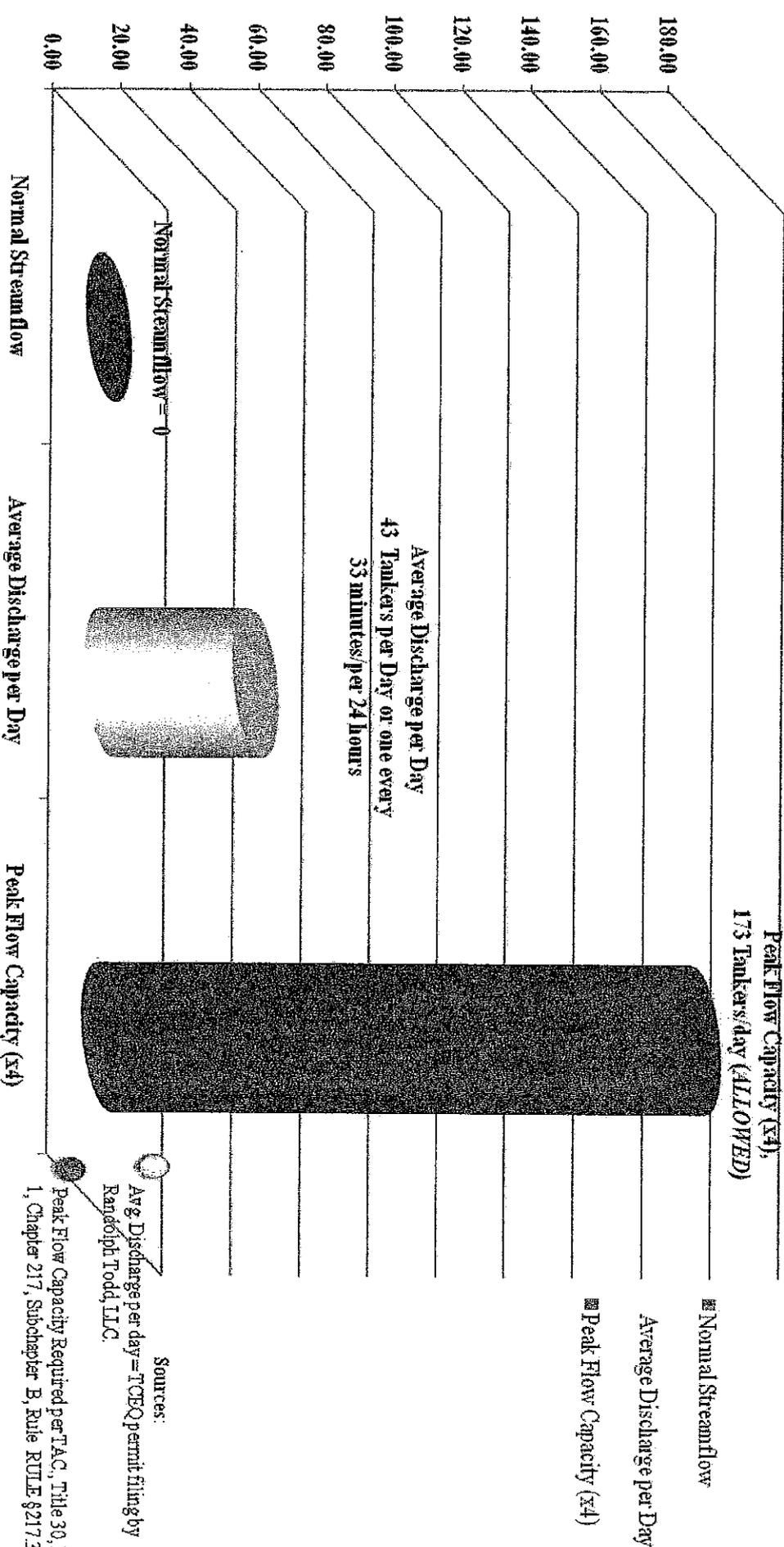
## Where would all the wastewater go?

Proposed Wastewater Treatment Plant



# TCEQ. It's Your Duty to Protect The State's Public Health and Natural Resources

Gasoline Tankers Per Day (9,000 gallons each)



Sources:  
 Avg Discharge per day = TCEQ permit filing by Randolph Todd, LLC.  
 Peak Flow Capacity Required per TAC, Title 30, Part 1, Chapter 217, Subchapter B, Rule RULE §217.32

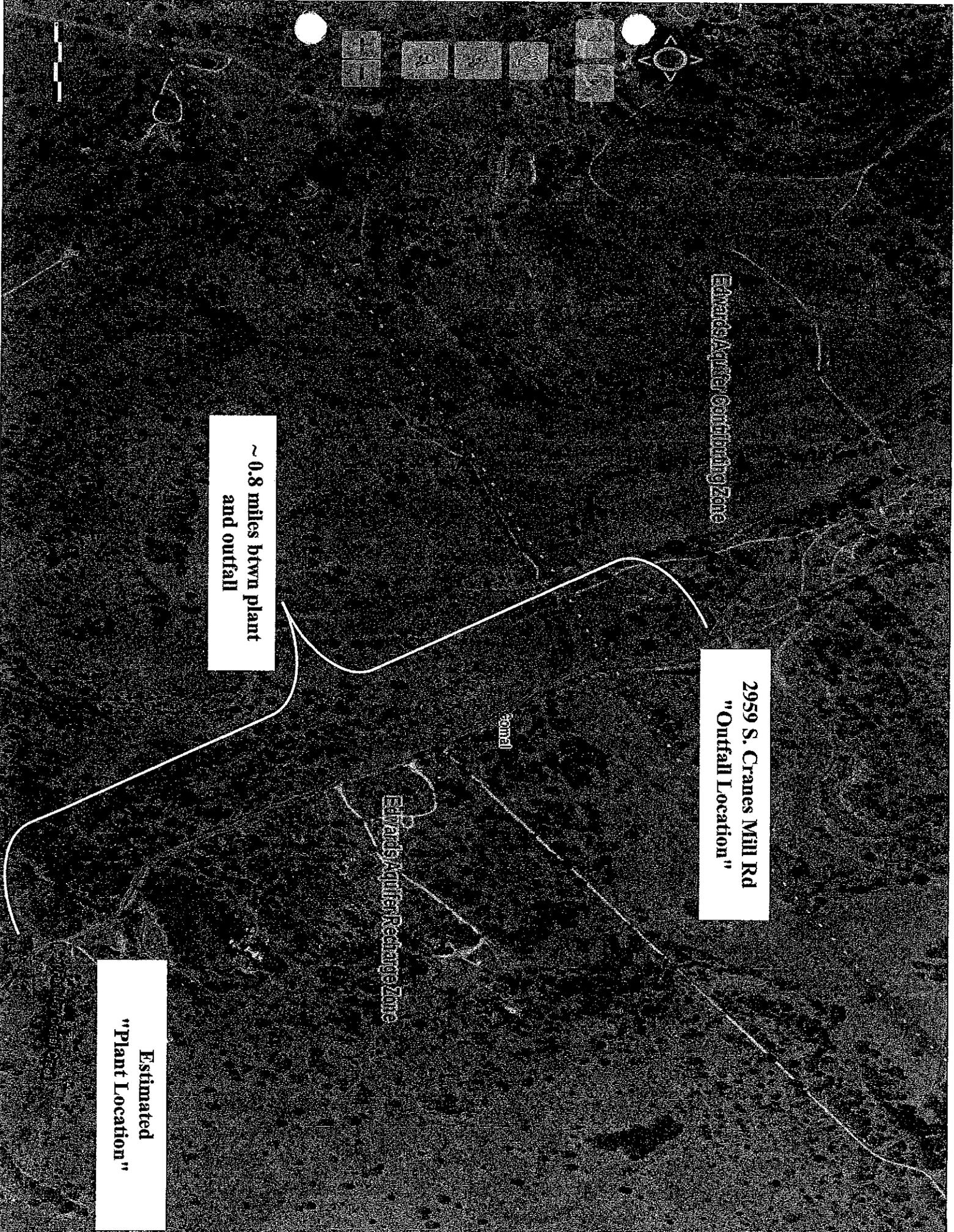
Edwards Aquifer Contributing Zone

2959 S. Cranes Mill Rd  
"Outfall Location"

~0.8 miles betwn plant  
and outfall

Edwards Aquifer Recharge Zone

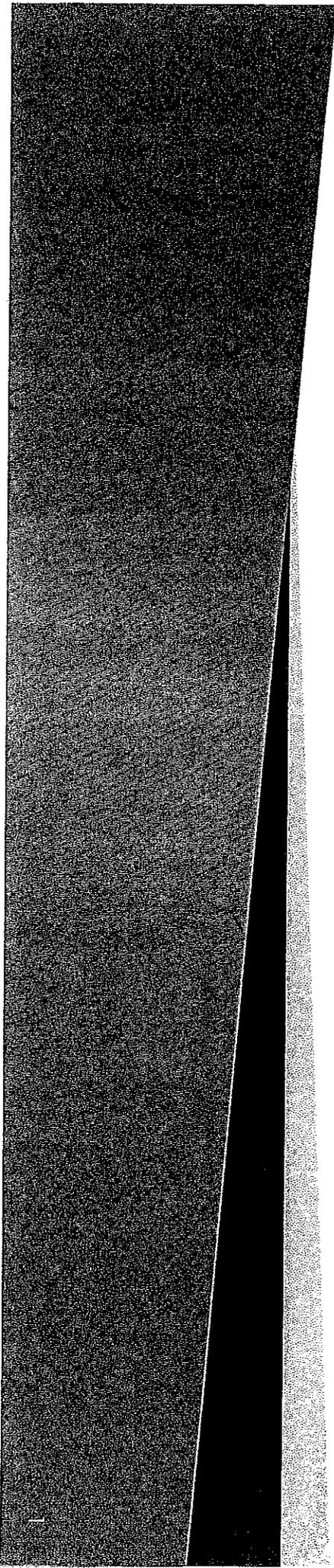
Estimated  
"Plant Location"



# Exhibit 3

## Dry Comal Creek

and Dry Comal Creek Vineyards



# Dry Comal Creek

## ▶ Perennial Pond

- Aquatic Life
- Water for Cattle
- Water for Wildlife
- Sits atop of Recharge Zone from which our wells tap into water for irrigating crops and provides drinking water for personal and business uses



# The USGS Store

[V.V. Back To Store](#) | [About](#) | [USGS Maps](#) | [GeopDF Maps](#) | [US Topo Maps](#) | [Historical Topographic M](#)

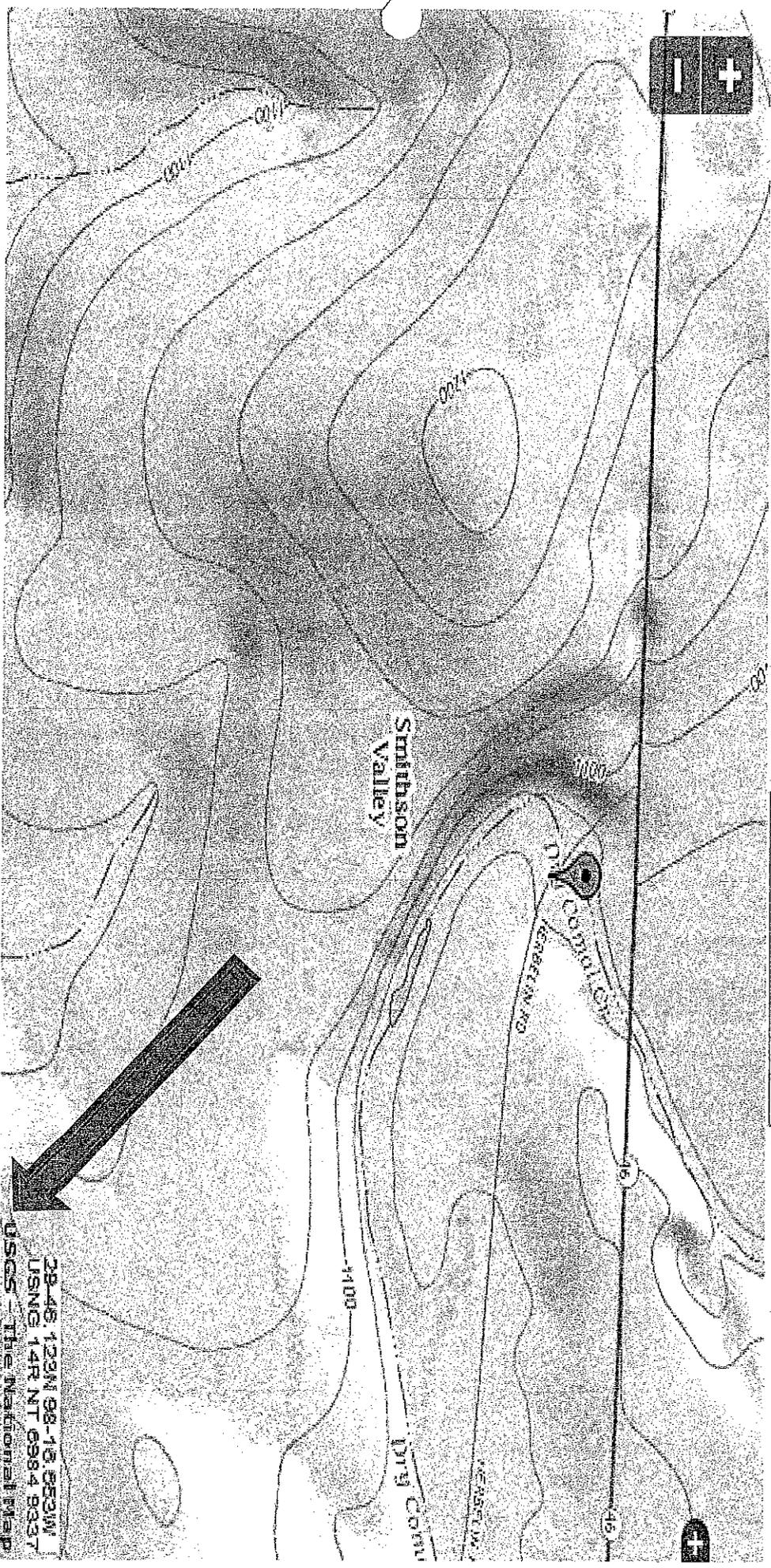
## Map Locator & Downloader

[Explore Historical Topo Map Viewer](#)

Don't see the Map Locator & Downloader? [Help](#) | Having trouble? Call: 1-888-ASK-USGS (1-888-275-8747, Select

Search:

[Search Help](#)

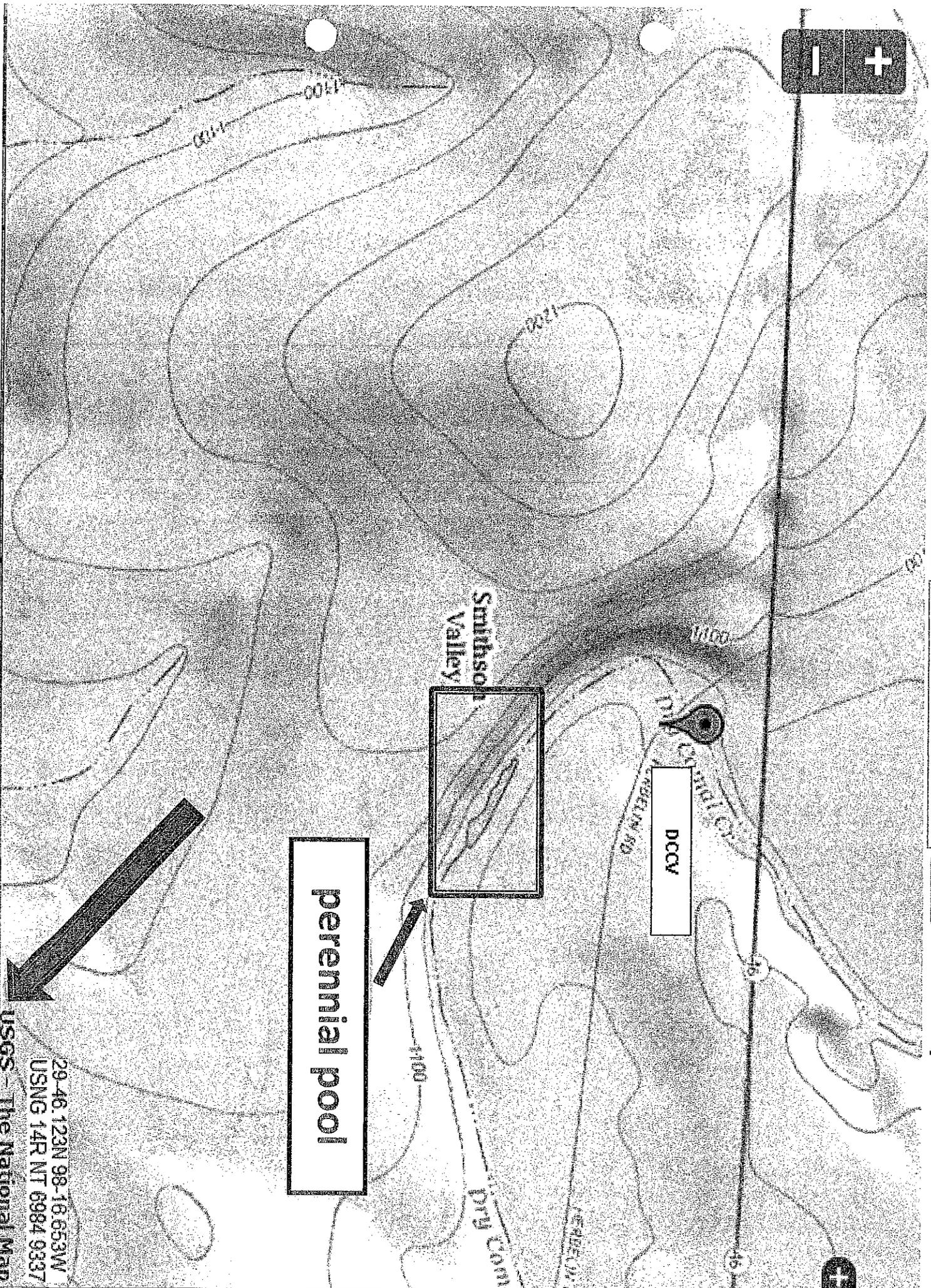
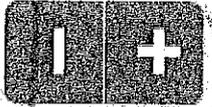


28-48 123N 98-10 853W  
USNG 14R NT 6984 9337  
USGS - The National Map

Search: 1741 herbin rd, new braunfels

Address or Place

Go Search Help

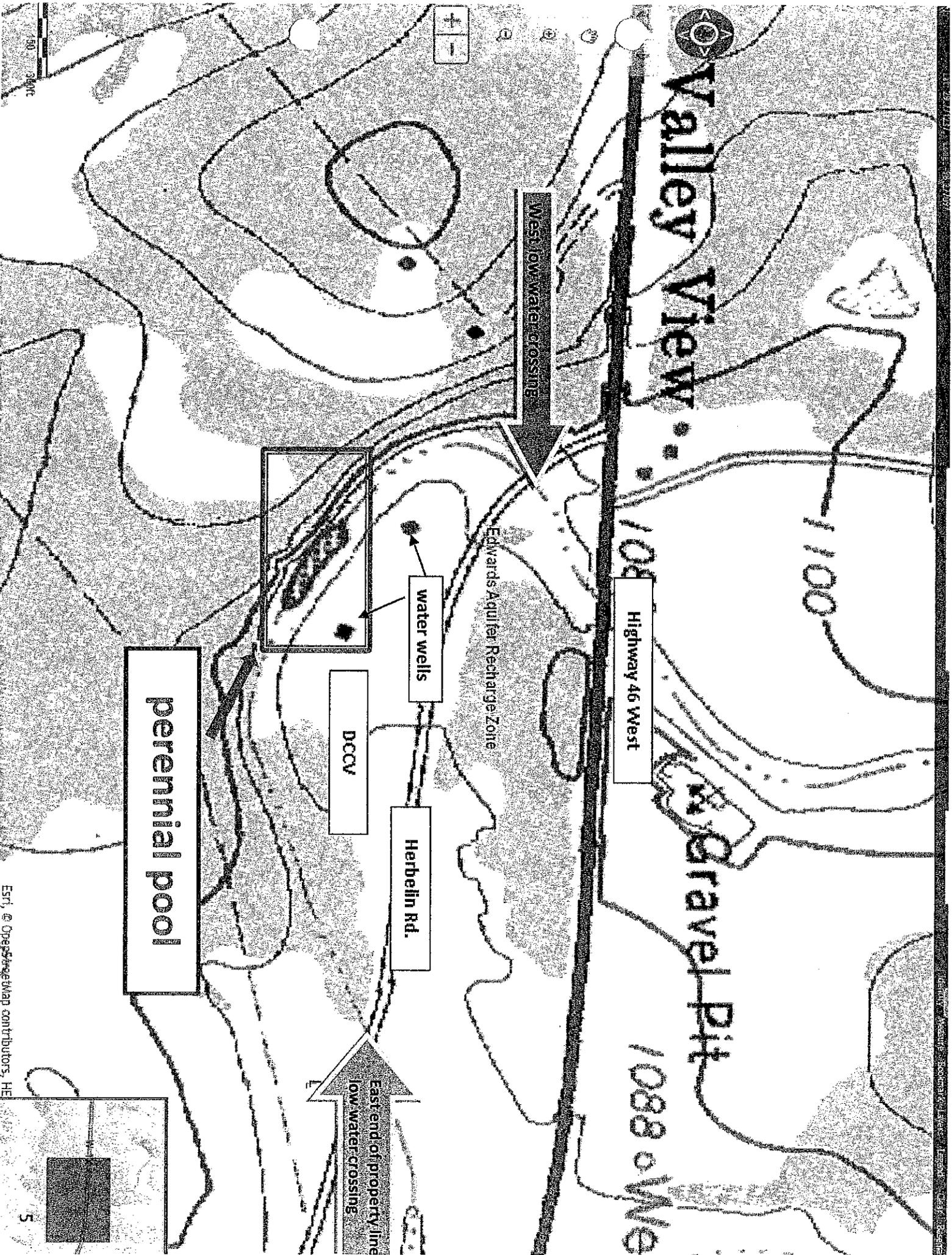


Smithson Valley

DCCV

perennial pool

29-46 123N 98-16.653W  
USNG 14R NT 6984 9337  
USGS - The National Map



# Valley View

1080 Highway 46 West

1100

Gravel Pit

1088 0 Me

West low water crossing

Edwards Aquifer Recharge Zone

water wells

DCCV

Herbelin Rd.

perennial pool

East end of property line low water crossing

Q

?

Zoom To Scale

Select a scale: W



Highway 46 West

Herbelin Rd.

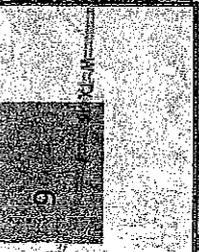
DCCV

Edwards Aquifer Recharge Zone

perennial pool

WEST LOW WATER CROSSING

East end of property line &  
low water crossing



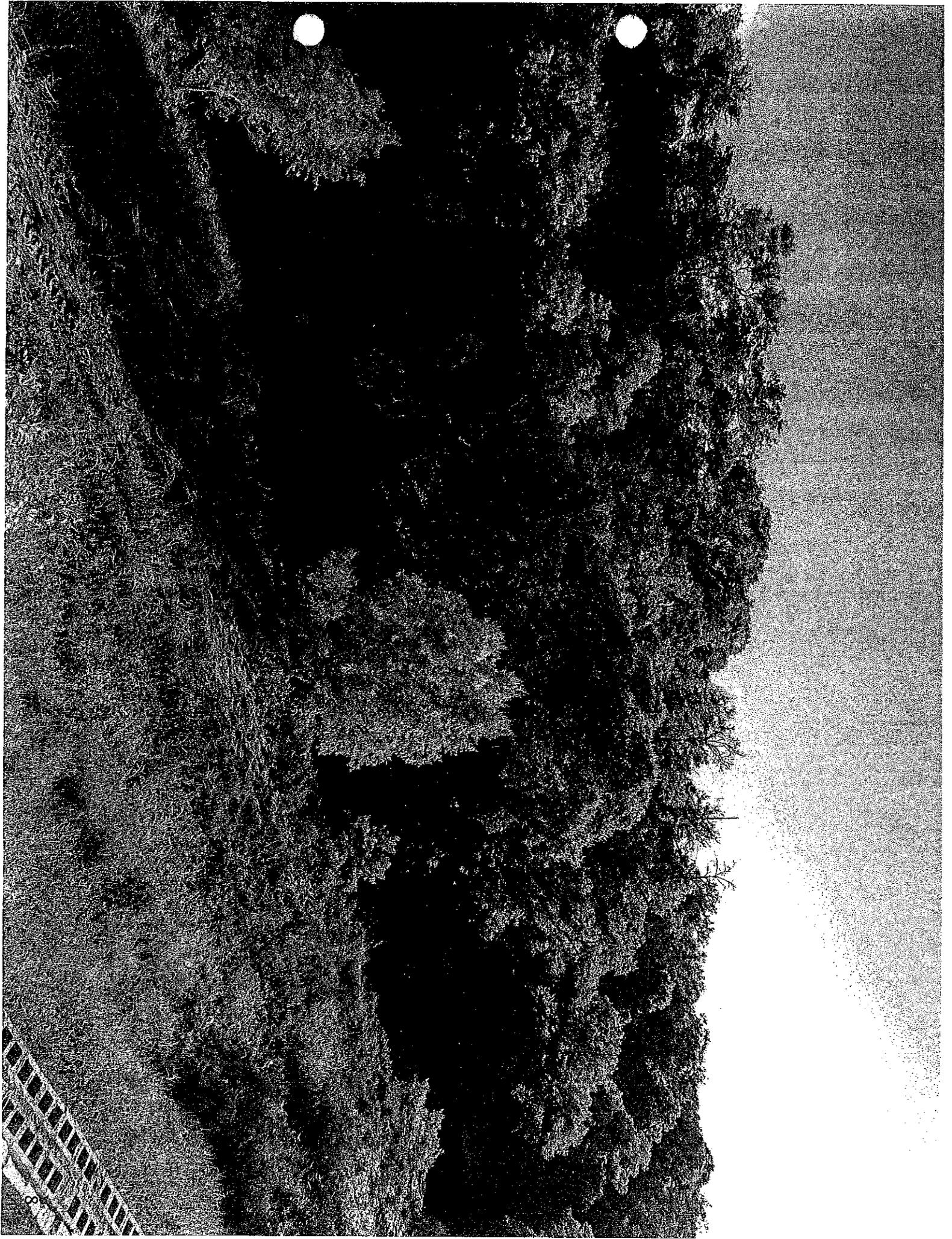


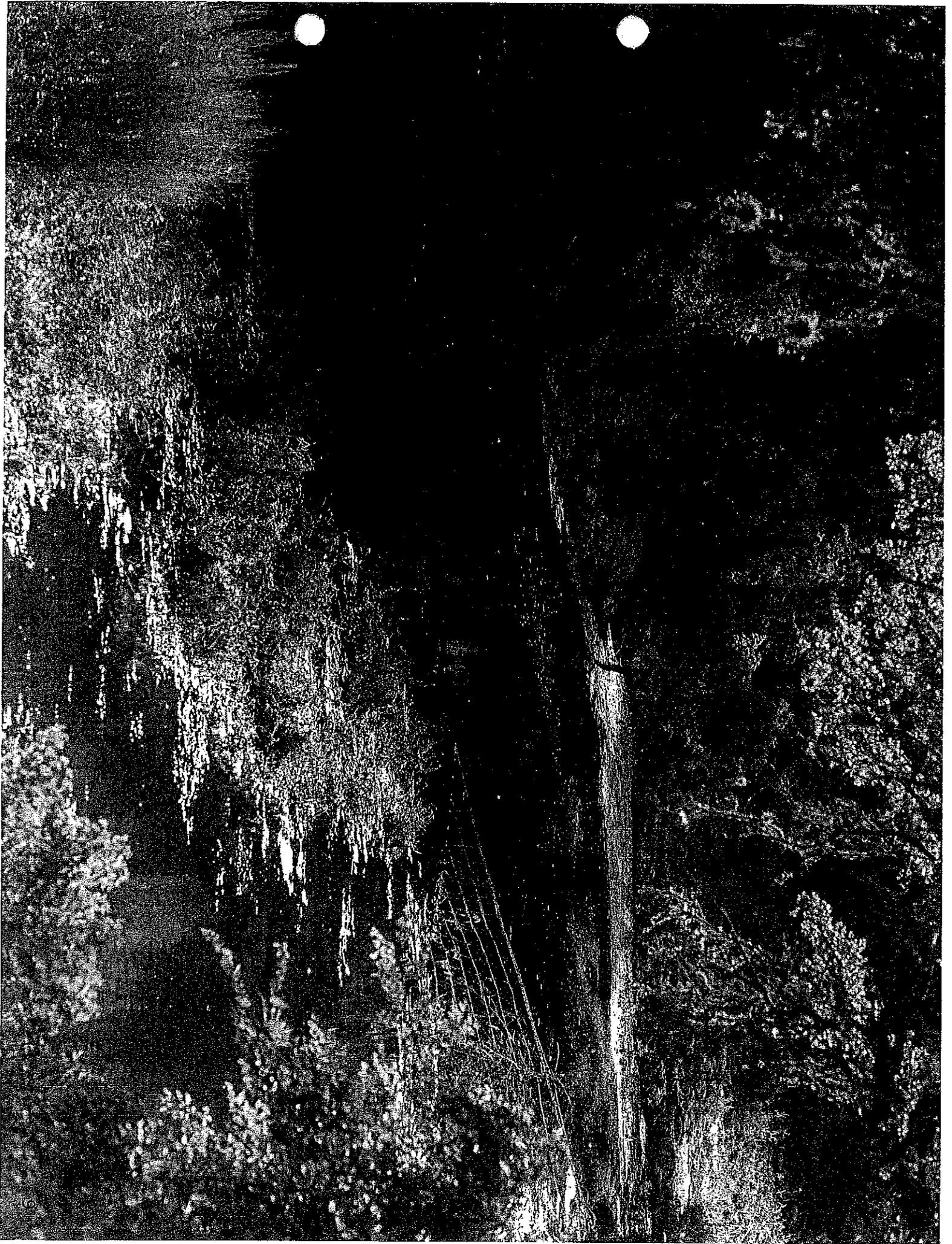
Edwards Aquifer Recharge Zone

perennial pool

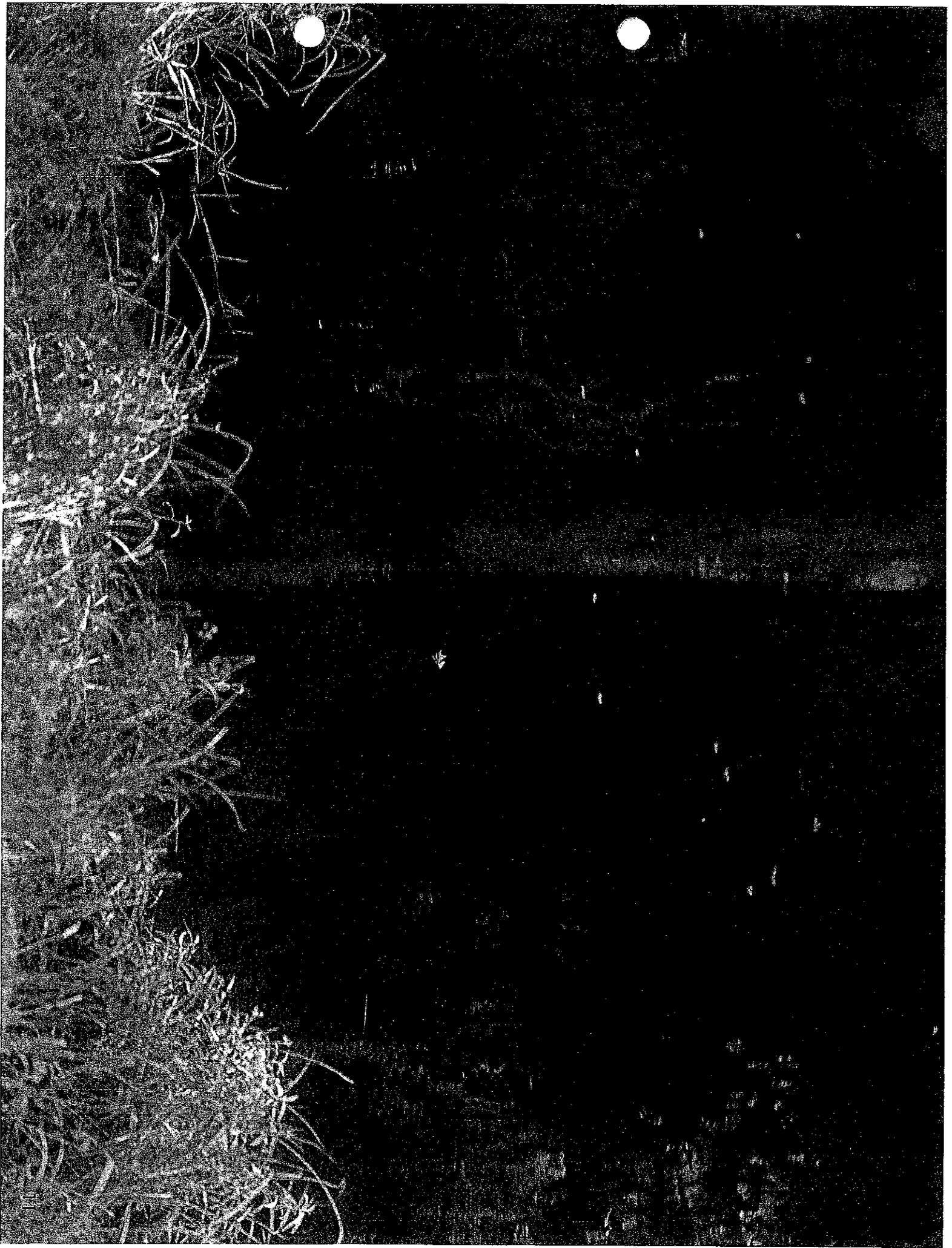
dry sand creek



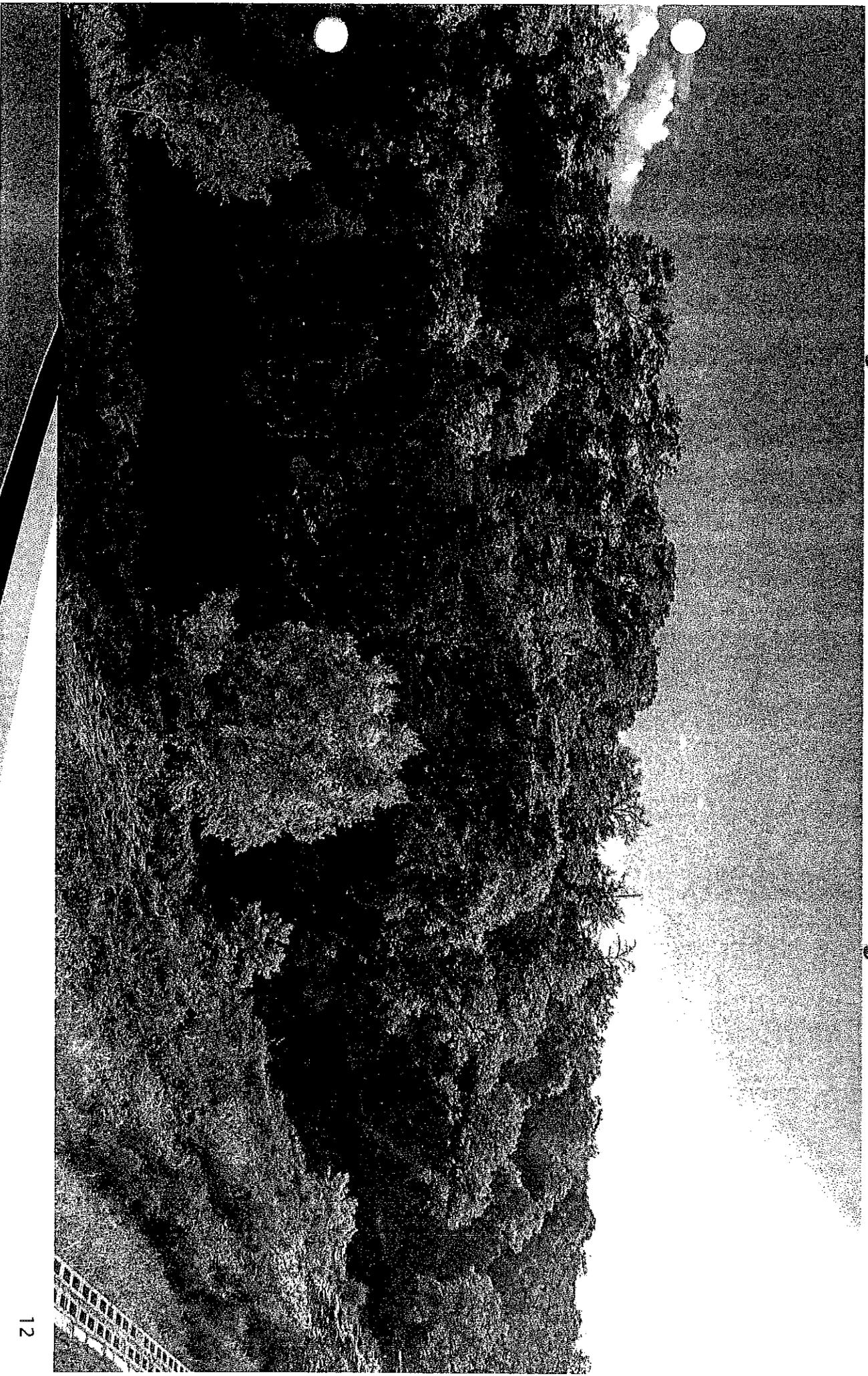


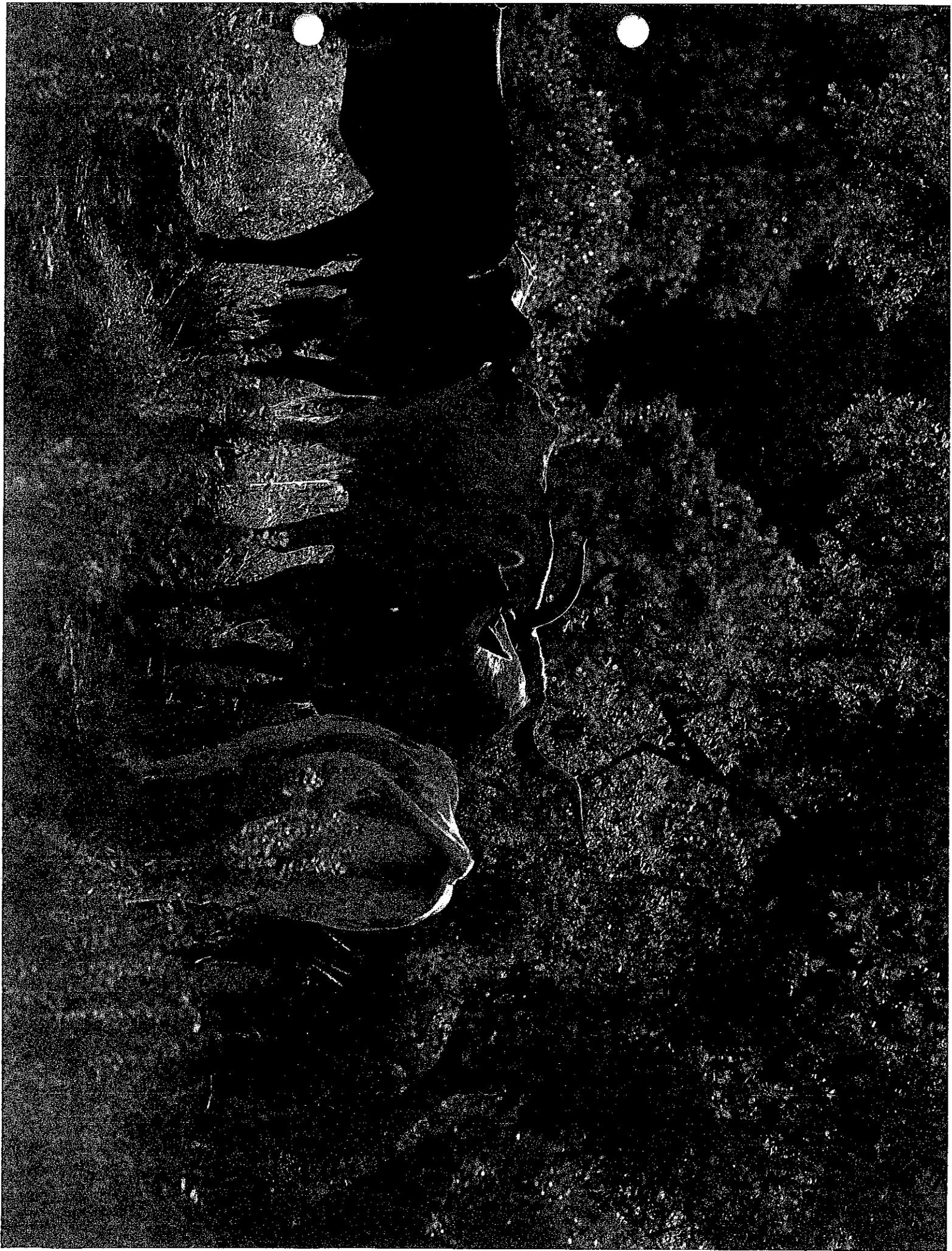


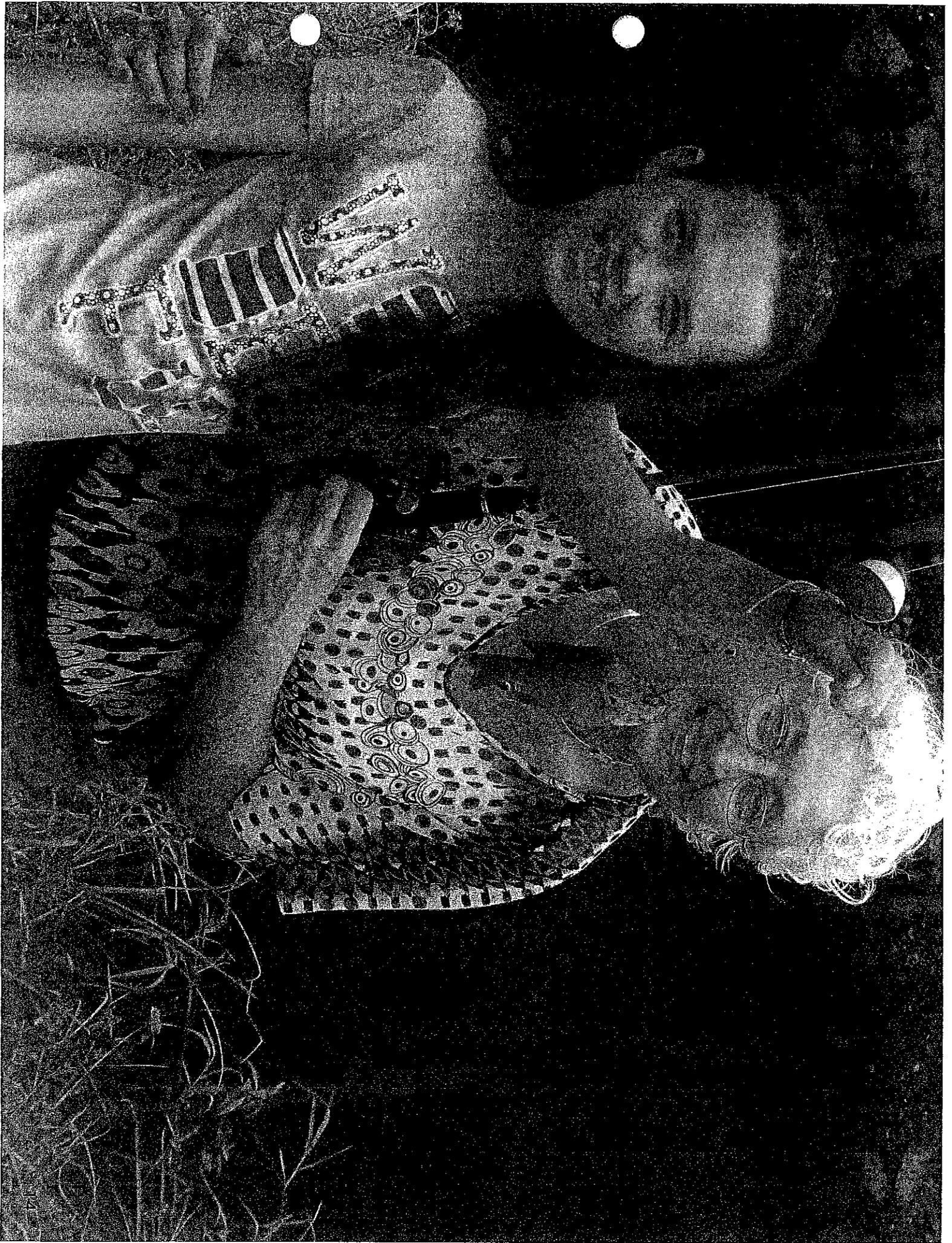




# ***Panoramic View of Dry Comal Creek @ Dry Comal Creek Vineyards***





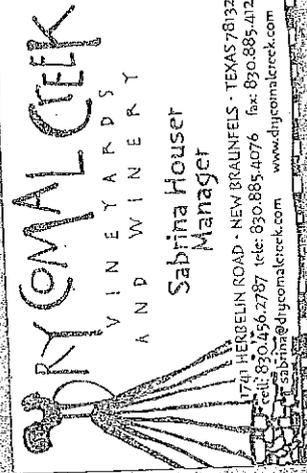


Dry Comal Creek Vineyards and Winery  
Sabrina Houser Amaya  
1741 Herbelin Rd.  
New Braunfels, TX 78132

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2015 OCT 12 PM 3:58

CHIEF CLERK'S OFFICE



Office of the Chief Clerk TCEQ  
12100 Park 35 Circle, Bldg F  
Austin, TX 78753

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:20 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** sabrina@drycomalcreek.com [mailto:sabrina@drycomalcreek.com]  
**Sent:** Saturday, October 10, 2015 11:17 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
9/60/56*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Sabrina Houser-Amaya

**E-MAIL:** [sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com)

**COMPANY:** Dry Comal Creek Vineyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8304562787

**FAX:**

**COMMENTS:** I, Sabrina Houser Amaya, resident at and owner of Dry Comal Creek Vineyards located at 1741 Herbelin Rd, New Braunfels, TX 78132, phone number 830/456-2787 or 830/885-4076 request a Contested Case Hearing on Permit # WQ0015314001 I am a person with Justifiable Interest and will be severely affected by this permit for the following reasons. A) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant

*Am*

and outfall sites (See Exhibit 1) Result Impacts Vineyard Operations a) Increased waste water discharge into the Edwards Aquifer Contributory and Recharge Zones b) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen i) Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production ii) We routinely sample our soil to ensure that the proper nutrients and their levels are present. iii) Disruption in water source increases need for alternative fertilizer treatments which leech into the water source. B) my residence and vineyard operations, including irrigation, winemaking and public water supply via wells, are approximately 3 miles downstream from the proposed plant and outfall sites (See Exhibit 1) Result Impacts Public Water Supply and Ability for Business to Remain in Business 1) Increased the likelihood of E-Coli in the water supply which is used in irrigation of a food product and for public drinking water for our customers and employees in our business 2) The winery is required by the Comal County Health Department to test our water for E-Coli a) Upon positive results, the winery will be shut down immediately until it 's source is identified and remedied. b) A shut-down due to this identified E-Coli contamination will essentially put us out of business because by the onus is placed on Dry Comal Creek Vineyards to identify the source and rectify it. To do so will utilize capital monies that serve to keep the business running. Even a short-term closure will annihilate our ability to continue doing business. C) by allowing an upstream WWTP {plant site in recharge zone with sludge being pumped up nearly a mile to contributory zone for outfall - (see Exhibit 2)}, TCEQ is failing to take into consideration their own posted rules regarding PWS. Per the TCEQ Publication RG-421, by which wineries are being asked to conform, TCEQ is adding to the 'risk' of contamination of a public water source yet holding the downstream business responsible for monitoring and correcting should water samples be positive for coliform. Per TCEQ RG-421, Result Impacts Public Water Supply and Ability for Business to Remain in Business How can pathogens enter my water? TCEQ RG-421 Contamination of drinking water can occur either before or after treatment. Treated water may become contaminated through improperly maintained water facilities or other problems in the distribution system. If cross-connection controls fail or if leaking pipes result in negative pressure, the infiltration of contaminants may occur. Pathogens can enter a drinking water well along the casing or through cracks in the sanitary seal if it is not properly constructed, protected or maintained. Groundwater contamination can come from septic systems, leaking sewer pipes, landfills, sewage lagoons, abandoned wells, and storm water runoff. How can I protect my water system from contamination? TCEQ RG-421 • Properly maintain all water facilities. • Obtain a sanitary easement for each well. • Control or eliminate fecal sources that are in close proximity to the well. (How can TCEQ rightly ask a business to be compliant with this requirement, when upstream waste water effluent is being directly deposited into the Dry Comal Creek which sits atop both the Edwards Contributory and Recharge Zones and from which vineyard irrigation and public water supply is drawn) • Install backflow preventers. • Maintain a minimum pressure of 35 psi at all points within the distribution system. • Maintain a minimum disinfection residual of 0.2 mg/L free chlorine or 0.5 mg/L chloramines. D) failure to consider perennial pools as located on USGS maps (Related to ED Response 23. See Exhibit 3 - multiple pages directly from TCEQ map view site and the USGS site. In addition, TCEQ employees physically viewed this perennial pool). Result Impacts Perennial Pool a) Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen. The Role of Phosphorus in the Eutrophication of Receiving Waters: A Review. by David L. Correll \* Abstract Phosphorus (P) is an essential element for all life forms. It is a mineral nutrient. Orthophosphate is the only form of P that autotrophs can assimilate. Extracellular enzymes hydrolyze organic forms of P to phosphate. Eutrophication is the overenrichment of receiving waters with mineral nutrients. The results are excessive production of autotrophs, especially algae and cyanobacteria. This high productivity leads to high bacterial populations and high respiration rates, leading to hypoxia or anoxia in poorly mixed bottom waters and at night in surface waters during calm, warm conditions. Low dissolved oxygen causes the loss of aquatic animals and release of many materials normally bound to bottom sediments including various forms of P. This release of P reinforces the eutrophication. Excessive concentrations of P is the most common cause of eutrophication in freshwater lakes, reservoirs, streams, and headwaters of estuarine systems. In the ocean, N becomes the key mineral nutrient controlling primary production. Estuaries and continental shelf waters are a transition zone, where excessive P and N create problems. It is best to measure and regulate total P inputs to whole aquatic ecosystems, but for an easy assay it

is best to measure total P concentrations, including particulate P, in surface waters or N/P atomic ratios in phytoplankton. In summary, there remains a number of adverse affects that this Waste Water Treatment Plan will impose on downstream residents and businesses that have not been taken into consideration. Despite the fact that the permit request and supporting documentation 'meet' the intent of the regulations; TCEQ rapacious permitting process which maintains that the permittee will follow all building and monitoring requirements and that there is minimal or no long term effects is 'blue sky' thinking. While TCEQ may view my concerns as 'the sky is falling', I maintain that it's not a matter of 'if' but 'when' the sky will fall on this WWTP. While it's clear in my brief interactions with TCEQ and attendance of contested case hearings whereby the opinions of the ALJ and OPIC were wholesale disregarded and that the TCEQ will do nothing but continue to allow this WWTP permit to continue, I implore TCEQ to consider the points presented above and properly address them such that the TCEQ increases the WWTP requirements to ensure minimal degradation to the Dry Comal Creek (despite the fact that TECQ doesn't believe there will be any degradation), and at minimum, a more superior Tier 2 system be required. Such changes may assist minimum short and long-term damage.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, June 29, 2015 2:50 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** Keeping Our Water Blue - Final for TCEQ.pdf

*MWD  
7/20/15*

H

**From:** [sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com) [mailto:[sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com)]  
**Sent:** Monday, June 29, 2015 2:46 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Sabrina Houser Amaya

**E-MAIL:** [sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com)

**COMPANY:** Dry Comal Creek Vinyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8308854076

**FAX:** 8308854076

**COMMENTS:** I request a contested case hearing on this permit. I am an affected party by virtue of being a resident and business owner ~ 3 miles downstream from the outlay of the effluent. Notwithstanding that Dry Comal Creek has no normal stream flow, this permit will allow 43-9 gallon tankers to dump into the Dry Comal Creek every 33 minutes every 24 hours. This will negatively affect the Edwards Aquifer Recharge Zone, by

*MWD*

putting chlorinated water into a fragile ecosystem, which feeds water wells for drinking water, crop irrigation and water for wildlife and cattle. While the initial outflow is into the contributory zone, there is only a very short distance whereby the effluent will then come in contact with the Recharge Zone. The level of treated effluent will not minimize possible contamination of groundwater based on requested effluent limits nor has the applicant demonstrated that the effluent discharged will adequately protect the Edwards Aquifer and wells of other affected persons. In addition, because all my residential and business property is on the Edwards Aquifer recharge zone, all treated effluent discharge should be prohibited according to TAC Rule 213. 6 (1) New industrial and municipal wastewater discharges into or adjacent to water in the state that would create additional pollutant loading are prohibited on the recharge zone. This permit will create additional pollutant loading.

# Keeping Our Water Blue

A Moral Dilemma To a Real Problem



# **It's Your Duty to Protect State's Public Health and Natural Resources**

- This Permit Request Does NOT fulfill that duty
- Builders can do almost whatever they like on sensitive properties adjacent to the Recharge Zone
- Continuous dumping of 'non-potable' treated effluent affects the Edwards Aquifer water quality thus negatively affecting water used by wildlife and for cattle, crop irrigation and county drinking water!
- Dumps 390,000 gallons into an 'unclassified' water course that is 'dry' most of the time.
- Impact downstream - Notwithstanding the amount of non-potable water, the Dry Comal Creek is a watershed creek for flood waters, thus ending up in the Comal River for which New Braunfels tourism heavily relies.

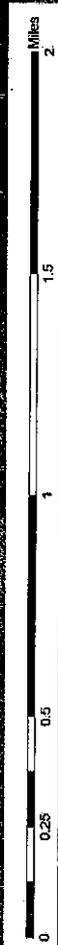
# West Fork Dry Comal Creek Watershed

## Proposed Treatment Plant

## Dry Comal Creek Vineyard

Normal Condition

Wet Condition



**Legend**

- USGS Streamflow
- USGS Elevation Contours
- FEMA FIRM C3
- 1% Flood Zone (100 year)
- Applifer Zones
- Combining Zone
- Postage Zone
- Adaptation Zone

USGS Streamflow  
--- 100 cfs  
--- 200 cfs  
--- 500 cfs  
--- 1000 cfs  
--- 2000 cfs  
--- 5000 cfs  
--- 10000 cfs  
--- 20000 cfs  
--- 50000 cfs  
--- 100000 cfs

USGS Elevation Contours  
--- 100 ft  
--- 200 ft  
--- 300 ft  
--- 400 ft  
--- 500 ft  
--- 600 ft  
--- 700 ft  
--- 800 ft  
--- 900 ft  
--- 1000 ft

FEMA FIRM C3  
--- 1% Flood Zone (100 year)

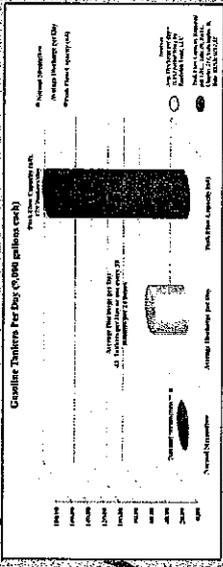
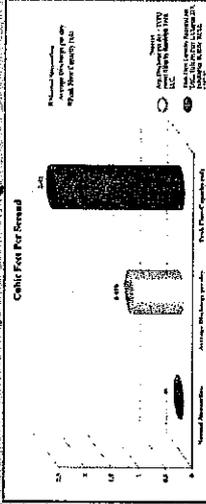
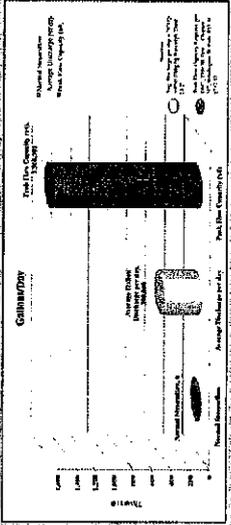
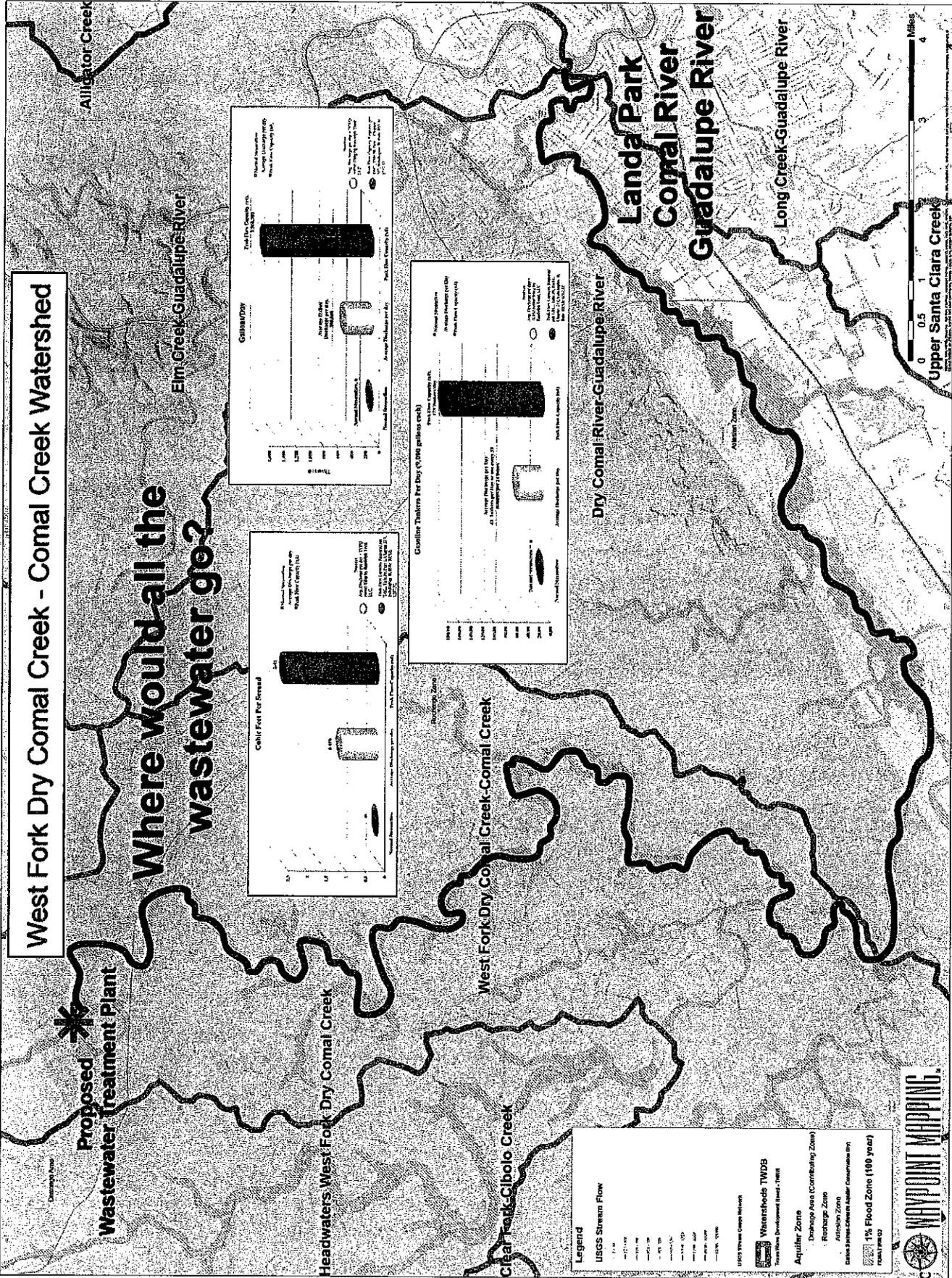
Applifer Zones  
--- Combining Zone  
--- Postage Zone  
--- Adaptation Zone



# West Fork Dry Comal Creek - Comal Creek Watershed

## Where would all the wastewater go?

**Proposed Wastewater Treatment Plant**



**Legend**

- USGS Stream Flow
- Watersheds TWDB
- Watershed Boundaries
- Aquifer Zone
- Discharge Area (Contributing Zone)
- Floodage Zone
- Arroyo Zone
- 1% Flood Zone (100 year)

1993 Watershed Group Members

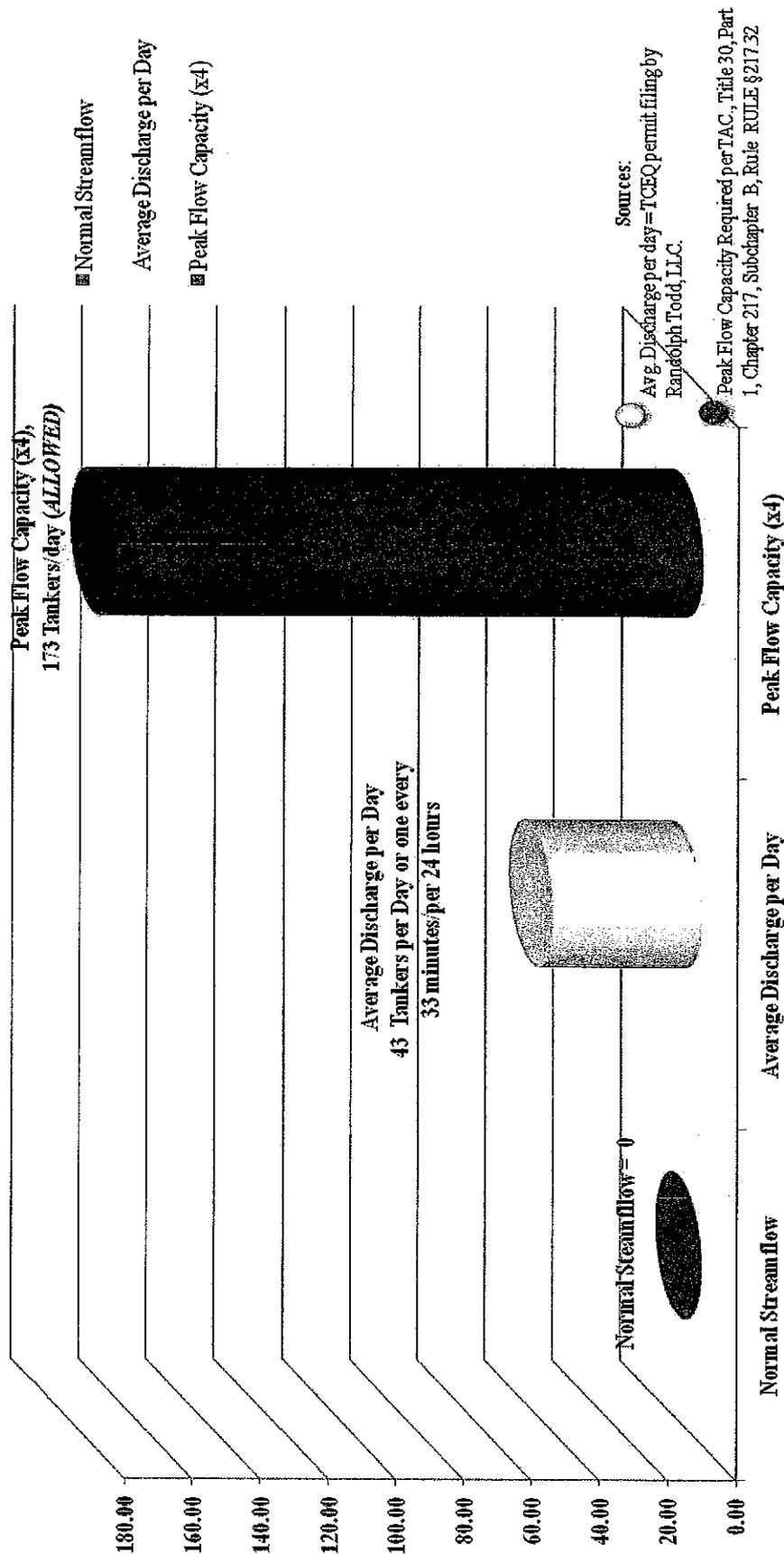
WAYPOINT MAPPING



# TCEQ. It's Your Duty to Protect TMC

## State's Public Health and Natural Resources

Gasoline Tankers Per Day (9,000 gallons each)





## Water Control Water Quality

- Although scientific measurements are used to define water quality, it is not a simple thing to say “that water is good” or “that water is bad.”
- The determination is typically made relative to the purpose of the water – is it for drinking or to wash a car with or for some other purpose?
- **Poor water quality can pose a health risk for people.**
- **Poor water quality can also pose a health risk for ecosystems**

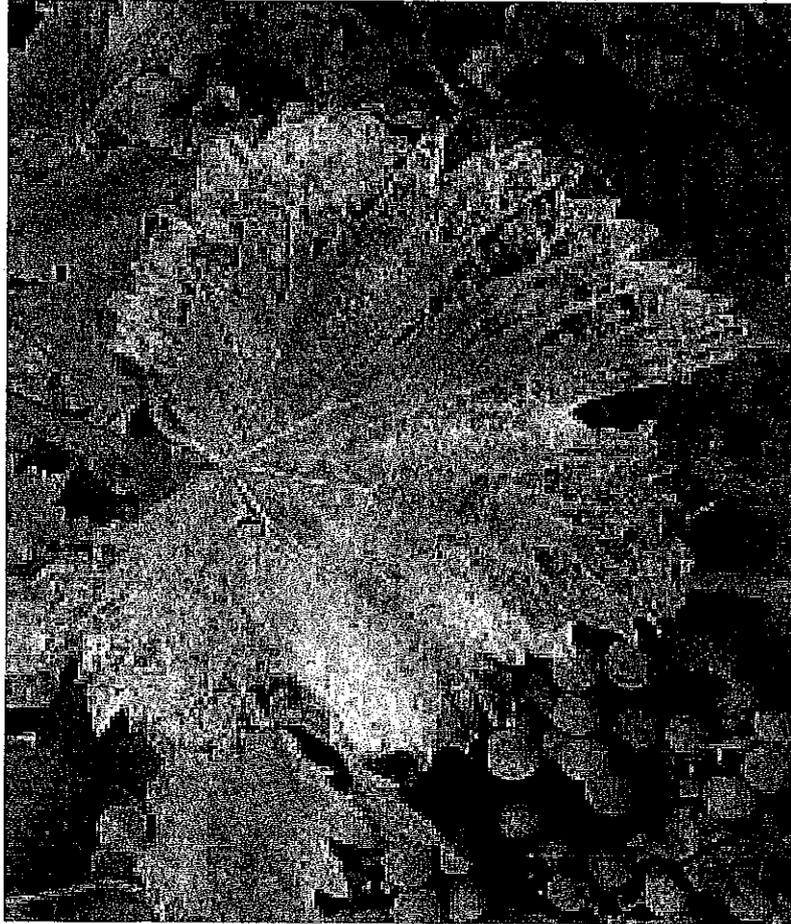


## Effects to Dry Comal Creek

### of This Permit

- Increased waste water discharge into the Edwards Aquifer
  - Result in eutrophication – an excess of nutrients (i.e.. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen
  - Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production
  - We routinely sample our soil to ensure that the proper nutrients and their levels are present.

# Overly Phosphorous Affected Grapevine



When plants get too much potassium, the absorption of other nutrients is inhibited, which leads to the symptoms caused by the deficiency of these nutrients (Nitrogen, Magnesium, Manganese).

The Remedy: adding MORE fertilizer to address these deficiencies.

Remedy impacts the Edwards Aquifer

## *Dry Comal Creek River Segment*

- *The facility will be located at 2959 South Cranes Mill Road, in Comal County, Texas 78132. The treated effluent will be discharged to Dry Comal Creek; thence to Comal River in Segment No. 1811 of the Guadalupe River Basin. The unclassified receiving water use is minimal aquatic life use for Dry Comal Creek. The designated uses for Segment No. 1811 are high aquatic life use, public water supply, aquifer protection, and primary contact recreation*
- *Segment 1811: From the confluence with the Guadalupe River in Comal County to Klingemann St in New Braunfels in Comal County and is 4 miles long.*

## ~~Dry Comal Creek River Segment 1811-A~~

- *The facility will be located at 2959 South Cranes Mill Road, in Comal County, Texas 78132. The treated effluent will be discharged to Dry Comal Creek; thence to Comal River in Segment No. 1811 of the Guadalupe River Basin. The unclassified receiving water use is minimal aquatic life use for Dry Comal Creek. The designated uses for Segment No. 1811 are high aquatic life use, public water supply, aquifer protection, and primary contact recreation*
- The 'true' outfall of the treated effluent is on river segment 1811-A, not 1811, as alluded to in the permit.
- Permit sites address as 2959 S. Cranes Mill Rd which is in Segment 1811-A: From the confluence of the Comal River in NB in CC to upstream perennial portion of the stream southwest of NB in CC and is 30 miles long.
- **Why was the true River Segment of 1811-A not considered in review by the TCEQ when this segment has since 2000 been identified as a Category 5 for bacteria?**

# Comal Creek been cited with Category 5c bacterial levels in 2010

SegID: 1811A Dry Comal Creek (unclassified water body)

From the confluence of the Comal River in New Braunfels in Comal County to the upstream perennial portion of the stream southwest of New Braunfels in Comal County

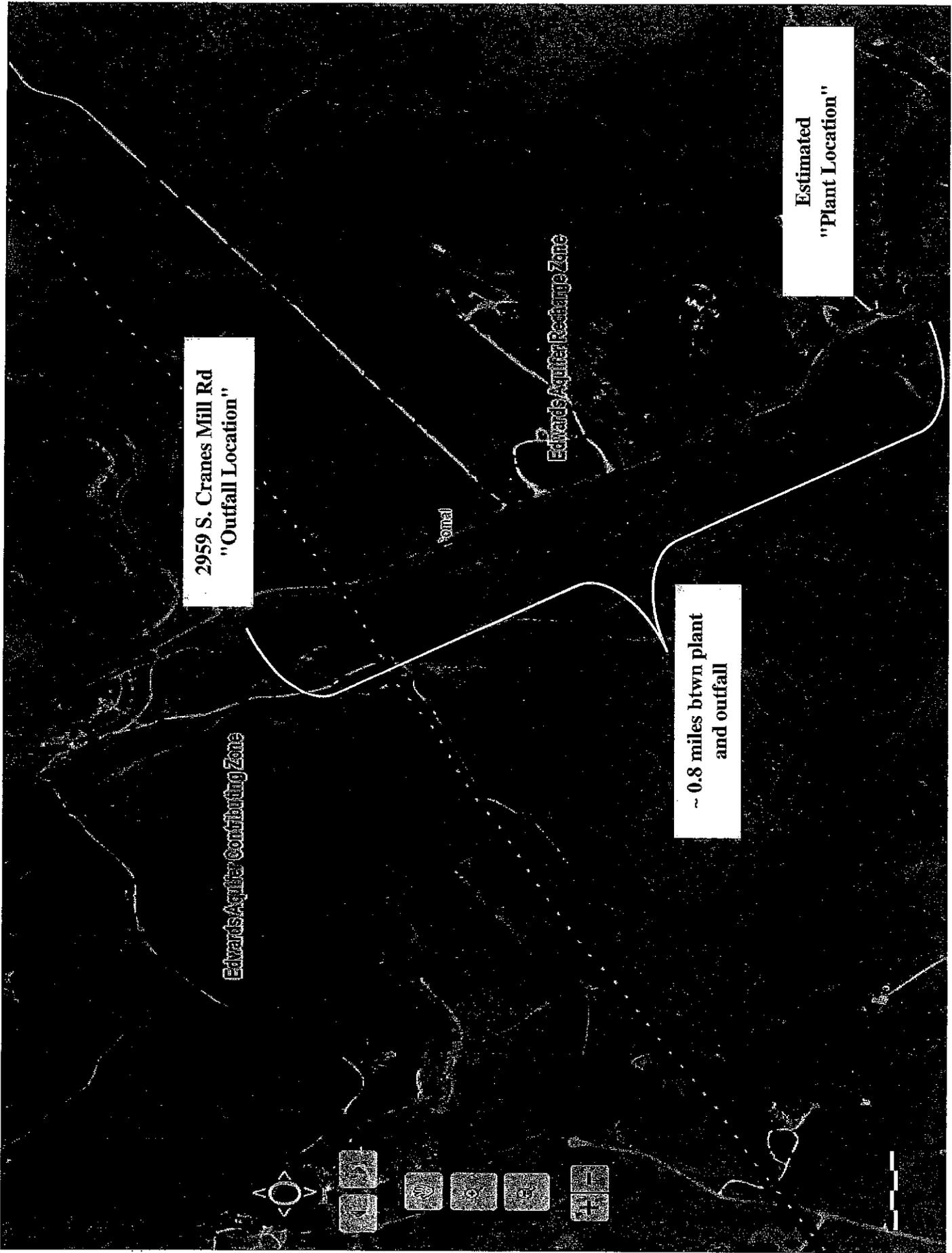
<u>Parameter(s)</u>	<u>Category</u>	<u>Year Segment First Listed</u>
bacteria	5c	2010
1811A_01		Lower 25 miles of water body

Category 5: The water body does not meet applicable water quality standards or is threatened for one or more designated uses by one or more pollutants. Category 5c - Additional data or information will be collected and/or evaluated for one or more parameters before a management strategy is selected.

# Comal Creek River Segment been cited with Category 5c bacterial levels in 2014 (draft)

SegID: 1811A Dry Comal Creek	From the confluence of the Comal River in New Braunfels in Comal County to the upstream perennial portion of the stream southwest of New Braunfels in Comal County	<u>Category</u>	5c	<u>Year Segment First Listed</u>	2010
<u>Parameter(s)</u> bacteria	1811A_01 Lower 25 miles of water body				

Category 5: The water body does not meet applicable water quality standards or is threatened for one or more designated uses by one or more pollutants.  
 Category 5c - Additional data or information will be collected and/or evaluated for one or more parameters before a management strategy is selected.



2959 S. Cranes Mill Rd  
"Outfall Location"

Edwards Aquifer Recharge Zone

Estimated  
"Plant Location"

~ 0.8 miles btwn plant  
and outfall

Edwards Aquifer Contributing Zone



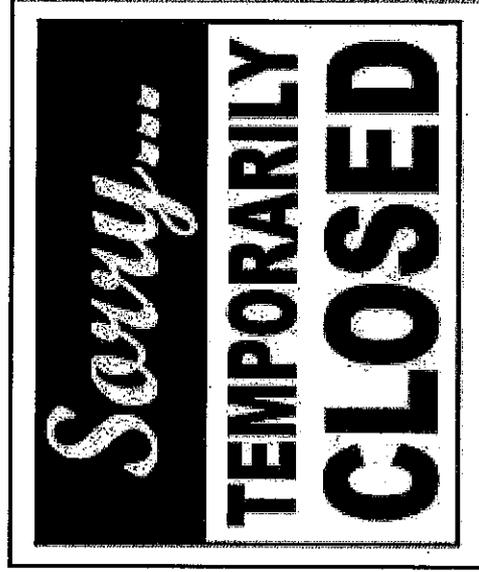
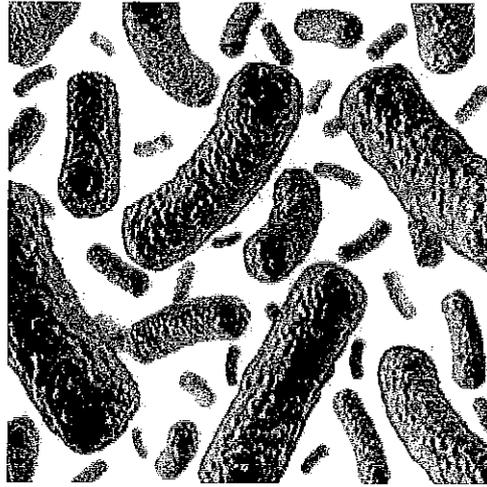


## Effects on Dry Comal Creek Winery and US

### of This Permit

- Increased waste water discharge into the River Segment 1811-A (Dry Comal Creek – unclassified) and the Edwards Aquifer
  - Increases the likelihood of *E-Coli* in the water supply which is used in irrigation of a food product and for drinking water for our customers and employees in our business
  - The winery is required by the Comal County Health Department to test our water for E-Coli
  - Upon positive results, the winery will be shut down immediately until it's source is identified and remedied.
  - How do you remedy E-Coli in waste water effluent without a lot of time and money?

# Effects on Dry Comal Creek Riparian of This Permit



The presence of *E. coli* in water is a strong indication  
of sewage contamination

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 04, 2015 8:48 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [sabrinahouser@drycomalcreek.com](mailto:sabrinahouser@drycomalcreek.com) [mailto:[sabrinahouser@drycomalcreek.com](mailto:sabrinahouser@drycomalcreek.com)]  
**Sent:** Tuesday, March 03, 2015 7:08 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWA  
9/6/05/12*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Sabrina Houser Amaya

**E-MAIL:** [sabrinahouser@drycomalcreek.com](mailto:sabrinahouser@drycomalcreek.com)

**COMPANY:** dry comal creek vineyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8308854076

**FAX:** 8308854124

**COMMENTS:** We request a 'PUBLIC HEARING" of this permit prior to it's approval.

*MWA*

1

TCEQ Public Meeting Form  
June 18, 2015

Randolph Todd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Sabrina House-Amaya

Mailing Address: 1741 Herbert Rd

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

City/State: NO TX Zip: 76132

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

Email: SABRINA@DDEY.COM@CREEK.COM

Phone Number: 830/456-2787

• 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

TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/2015

**RECEIVED**

JUN 18 2015

[BACK TO](#) Back to Report Result 1 - 1

**AT PUBLIC MEETING**

1 - 100 | 101 - 105 |

Comments:			
Comment letters, etc. received since November 2008 are viewable in PDF by clicking on the Correspondence Type.			
Date Received	Commentor	Correspondence Type	Comments Submitted Electronically
06/18/2015 9:23 AM	<u>ONEAL,KERMIT</u>		DONT RUIN OUR LAKE. We won't stand for this. Take your filth somewhere else. Our water is pure. We will keep it that way.
06/18/2015 9:20 AM	<u>ONEAL,SARAH</u>		WHAT MAKES YOU THINK I WANT YOU TO DUMP SEWEGE IN OUR LAKE? We moved here to get away from pollution. The day you start drinking what you dump, then we can talk.
06/17/2015 2:42 PM	<u>JUDD,BRITTANY</u>		I vote NO! When it floods the waters will contaminate our Rivers. For many people the river is their livelihood and if tourists aren't going to the river because of contamination, jobs will be lost.
06/17/2015 1:01 PM	<u>PIERSON,AMANDA L</u>		Please vote NO do not approve this permit. I drive this road S. Cranes Mill Road every day. The impact on the environment will be devastating. IF you vote YES the possible effects on the Edwards Aquifer, flooding concerns, impact in the 100 year flood plain thru which much of the Dry Comal Creek traverses, the environment and to approve it would threaten the fragile ecosystem of the Edwards Aquifer, and sewer effluent would affect waster for wildlife, cattle, irrigation for crops and drinking water for those who rely on wells in the Aquifer area. Per the TCEQ "The issues we can consider when we review a permit application are set by the Legislature through state law. Under those laws, you do not have the authority to consider these matters when you review a permit application:PLEASE VOTE NO
06/17/2015 12:46 PM	<u>MENN,CASEY JAMES</u>		Please do not allow such a development to happen over this environmentally sensitive area. It almost doesn't make sense to call the Hill County, "Hill Country" anymore. We have no open areas or springs anymore. They have been replaced with polluted waterways and cookie-cutter houses. Please practice what your title is and ensure the

*MW*

TCEQ Commissioners' Integrated Database - All Comments  
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06/01/2015 10:  
15 PM

HALL, TERRI

Comment -  
Written

environmental quality of Texas. Thank you, Casey Menn  
We strongly urge TCEQ to deny the Randolph Todd Company's wastewater permit. This permit would do irreparable harm to the neighboring landowners as well as anyone downstream of the Dry Comal Creek and those who depend on the water supply the Dry Comal Creek feeds into. No Texans should lose the use and enjoyment of their private property for another party's private (not public) use. If the developer wants to develop his/her land, the effluent needs to be wholly contained on their own land. The developer has no right to dump treated sewage onto his neighbor's land so that he can build more houses per acre than his own land can sustain for its own wastewater. This permit would violate the property rights of others as well as threaten water quality for untold thousands. This cannot take place in our Texas, where property rights are held sacred. Please deny this permit. The Randolph Todd Company should build a wastewater solution that can be contained on its own property without hindering or harming neighboring property owners or the water quality for the Trinity and Edwards.

05/28/2015 10:  
10 AM

GRAHAM, TERRELL

Comment -  
Written

This permit represents a clear attempt to circumvent Chapter 213 of TCEQ rules, prohibiting new discharges on the Edwards Aquifer Recharge Zone (EARZ). The proposal as I understand it is to locate a wastewater treatment plant on the EARZ. The wastewater effluent will then be piped into the Edwards Aquifer Contributing Zone (EACZ), discharged, releasing it into the Dry Comal Creek, emphasis on the word dry. From there the wastewater effluent will flow down the Dry Comal Creek, past the wastewater treatment plant that generated the wastewater effluent, if it has not all gone into the aquifer before then. The vast majority of the time, there will not be any practical difference between releasing the wastewater effluent into the Dry Comal Creek near the plant site and piping it away from the plant site into the EACZ. There will not be any dilution of the wastewater effluent, prior to it flowing back into the EARZ. The applicant's proposal to pipe the wastewater effluent away from the plant site, over the EARZ, into the EACZ amounts to smoke and mirrors, not protection of the Edwards Aquifer. No miraculous

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

		<p>change or magic will take place between the wastewater effluent discharge point, and the wastewater entering the EARZ. Any reasonable person taking an impartial look at what this permit represents, would simply characterize it as a new discharge in the EARZ, prohibited by current rules. If the TCEQ, developers, etc. feel that current TCEQ rules are too prohibitive and are harming job creation, business creation, etc., the honest, above board approach to these issues is to change the rules, not this current smoke and mirrors approach to circumvent current TECQ rules. Changing the rules would allow input from the public, legislators, etc. resulting in a fair and democratic process to address issues of concern to the State. Governing by fiat and unsupportable interpretations of rules and regulations, rather than governing by legislation and rule of law is what more</p>
<p>05/17/2015 1:42 PM</p>	<p><u>HARRIS, EDWARD</u></p>	<p><u>Comment - Written</u></p> <p>Dear Commissioners: The attached is the administrative judge decision for Johnson Ranch. The same type of permit was allowed for the Johnson Ranch as is being asked for on South Cranes Mill Road. 40,000 gallons more base on average flow per a day is being asked for on S Cranes Mill Road. Some of the same folks involved with Johnson Ranch development signed the documents for S Cranes Mill Road Sewage Treatment Permit application. Administrative Judge Ruling:  <a href="https://www.dropbox.com/sh/tnu9k18axy0g74l/AACPnTdJIctIutXMtNeBF5xa?">https://www.dropbox.com/sh/tnu9k18axy0g74l/AACPnTdJIctIutXMtNeBF5xa?</a> May 17th Flooding Dry Comal Creek Drop Box Link: Dry Comal Photos before March 2015 and on May 17th during heavy rains  <a href="https://www.dropbox.com/sh/ln6nd5p98fletf3/AABNxFgY4nxwjpoa7Islphba">https://www.dropbox.com/sh/ln6nd5p98fletf3/AABNxFgY4nxwjpoa7Islphba</a> Please consider the facts in administrative judge's ruling and expert testimony on doing no harm to landowners adjacent and downstream of proposed S cranes Mill Road Sewage treatment Plant Site referred to in SOAH Docket No. 582-14-3427, TCEQ Docket No. 2013-2228-MWD; SOAH Docket No. 582-14-1347 in your decision for S Cranes Mill Road Permit #WQ0015314001. It is clear the two applications and discharge amounts are the similar. In fact the S Cranes Mill Road site is not gradually increasing the amount but asking for 395,000 gallons average flow per a day which is 40,000 gallons more per a day then the Johnson ranches</p>

**TCEQ Commissioners' Integrated Database - All Comments  
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05/15/2015 7:3 8 PM	<u>GLASS.EDDIE DWAIN</u>	Comment - Written	<p>350,000 gallons per day. See pictures, videos, and files attached to Word Document submitted with this comment.</p> <p>I have over 20 years of experience treating water in an industrial environment. Specifically the introduction of waste streams into public waterways. Due to this experience, I am concerned about the contamination of our drinking water when there is a problem that causes the effluent of the wastewater plant to be off spec. In the industrial environment, emergency plans must be in place detailing the response. Storage tankage either portable or permanent, was one of the ways to mitigate the risk of contamination but it is extremely expensive. In industry, the owners of the permit are held financially liable for any violations of the permit and the procedures necessary to return the environment to normal. I presume the persons requesting this permit must supply a satisfactory response plan as well as prove the ability to financially absorb the costs associated with an incident.</p>
05/12/2015 2:2 5 PM	<u>MILLER.DOUG</u>	<u>Public Meeting - Request</u>	See Attachment
05/06/2015 12: 11 PM	<u>HOLT.RICKI ANN</u>	Comment - Written	<p>I live near to the proposed Johnson Ranch wastewater permit. The Administrative Law Judge's recommendation was to deny this permit. I ask that the TCEQ uphold the ALJ's recommendation and consider denying future development of the sewage treatment plant at Dry Comal Creek</p>
04/29/2015 10: 47 AM	<u>BLODGETT.JOHN HUDSON</u>	<u>Public Meeting - Request</u>	<p>Dear Sirs, I request a public meeting on the Meyer Ranch Development because it will directly affect my property values by allowing hundreds of thousand of gallons of waste effluent to be dumped adjacent and almost immediately into the Dry Comal Creek which will subsequently flow through the lower part of my subdivision (Vintage Oaks) and potential, during a flood, all the way down to Land Park. This trend of concentrated developments (3 to 5 houses per acre) is disastrous on 2 fronts; first, there isn't enough of the drought-stress aquifer water to support these developments over the long-term and second, the waste water will be dumped right near and into the recharge zone which will effect many property owners</p>

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

			in Comal Count but has the potential to effect millions of Texans who don't live in Comal County, but rely on clean water from the aquifer. Please deny this permit. Sincerely, John Blodgett, Resident of Vintage Oaks.
04/28/2015 11:03 AM	<u>HALL, TERRI</u>	Public Meeting - Request	Please hold a public meeting on this proposed Wastewater Plant (Frankie Meyer WCID). There are possible deleterious effects on the Edwards Aquifer, flooding concerns, impacts in the 100 year flood plain thru which much of the Dry Comal Creek traverses, and to approve it would threaten the property rights, land use, and enjoyment of the current affected landowners.
04/28/2015 10:25 AM	<u>MCCLELLAN, ELLEN</u>	Public Meeting - Request	I am requesting a public meeting-- I have lived in the area where this treatment facility would be located for the last 15 years- we have experienced flooding on our road 100's of times- our property will be in a constant state of flooding and we will have the potential for the Aquifer to be contaminated with pollution.
04/28/2015 9:26 AM	<u>DOOLEY LOGUE, SUSAN R</u>	Public Meeting - Request	I am requesting a public meeting on the issue of Permit WQ0015314001.
04/28/2015 9:02 AM	<u>WAGNER, FORD</u>	Public Meeting - Request	I request a public meeting.
04/26/2015 8:45 PM	<u>AMAYA, HECTOR</u>	Public Meeting - Request	I respectfully request that TCEQ allow a 'public meeting' of this proposed waste water treatment plant. It has already been determined that the formation of a WCID is not necessary, and therefore this petition to continue is not necessary. I also request to be added to the mailing list of when notices about this permit request are sent out. I live less than a mile from this petitioner's request to put in a waste water treatment plant and I was NOT notified of this petition.
04/26/2015 8:41 PM	<u>AMAYA, SABRINA HOUSER</u>	Public Meeting - Request	I respectfully request that TCEQ allow a 'public meeting' of this proposed waste water treatment plant. It has already been determined that the formation of a WCID is not necessary, and therefore this petition to continue is not necessary.
03/17/2015 7:48 PM	<u>GRUN, DEBBIE SABINS</u>	Public Meeting - Request	Request a Public Meeting. This is an issue that should be addressed by the public

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

Date and Time	Name	Request	Comment
03/17/2015 7:16 PM	<u>GRUN,EDWARD A</u>	Public Meeting - Request	I am requesting a public meeting be scheduled and held to allow public concerns related to this permit application be voiced and heard by TCEQ officials. Legitimate concerns have been brought to light regarding the proposed projects included in the submitted permit and their potential affect on public welfare and safety. Thank you for your consideration.
03/11/2015 10:27 PM	<u>WEILER,JEFF</u>	Public Meeting - Request	The proposed wastewater treatment project will have a direct and negative impact on land values, home values, environmentally endangered species, drinking water aquifers and the Edwards Aquifer. The treatment system is designed to discharge into the Dry Comal Creek which has many caves which are not only home to bats but also are karst in nature and connect to drinking well aquifers and the Edwards Aquifer. Also the golden-cheeked warbler has habitats in juniper trees in the Dry Comal Creek area. Please deny this permit or let us have a public meeting to present our evidence to the TCEQ.
03/11/2015 10:51 AM	<u>TERRAO,KYLE</u>	Public Meeting - Request	I hereby request a public meeting in regards to this pending permit. I'm concerned with the negative impact of this proposed waste water treatment plant on the Dry Comal Creek, the Edwards Aquifer and the neighboring communities. I'm also concerned as this is one of three pending permits for waste water treatment facilities in this area of Comal County.
03/11/2015 10:40 AM	<u>TERRAO,CONNIE</u>	Public Meeting - Request	As a resident of Comal County and the VO subdivision, I hereby request a public meeting on this permit. I'm concerned with the affects of this plant on the Edwards Aquifer, the Dry Comal Creek and the environment.
03/11/2015 10:03 AM	<u>FRISK,RON</u>	Public Meeting - Request	I have concerns regarding this permit approval and the possible effluent contamination of the Edwards Aquifer and Comal Springs which could result thereof. I am asking for a public meeting. Thank you, Ron Frisk
03/10/2015 2:51 PM	<u>DAVIS,RONALD R</u>	Public Meeting - Request	I would like a public meeting regarding this appliction.
03/10/2015 2:50 PM	<u>DAVIS,NELDA S</u>	Public Meeting -	I would like a public meeting concerning the WCID.

**TCEQ Commissioners' Integrated Database - All Comments  
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		Request	
03/10/2015 7:01 AM	<u>DOEPPENSCHMIDT,JO NNI</u>	Public Meeting - Request	I would like to request a public meeting.
03/09/2015 4:10 PM	<u>HARRIS,EDWARD</u>	Public Meeting - Request	I am requesting a public meeting to take place in Comal County near the site of proposed Sewage Treatment Facility over the Edwards Recharge Zone. Boulder Springs event center has said they can host 400 participants. And are willing to because they are on located on Dry Comal Creek. The county court house is not near the area.
03/09/2015 4:04 PM	<u>HARRIS,DENSE</u>	Public Meeting - Request	I am requesting a public meeting in Comal County near the Sewage treatment plant site.
03/09/2015 2:36 PM	<u>SCALLAN,CRAIG</u>	Comment - Written	I do not think this proposal will in the end be safe for the environment. Please do not allow a permit to be issued allow a WCID to be established.
03/09/2015 1:44 PM	<u>BALGEMANN,DAN W</u>	Public Meeting - Request	Major concerns about this project. Strongly request a meeting
03/09/2015 1:34 PM	<u>JOHNSON,MARK</u>	Public Meeting - Request	I am requesting a public meeting regarding the South Cranes Mill permit. I have concerns for contamination of well water and availability of our drinking water with the proposed high density South Cranes Mill subdivision bordering the Edwards Aquifer Recharge zone. Dense populations create high water usage demands and lower the water table and availability of groundwater resources while increasing effluent waste being discharged into the neighboring Dry Comal Creek. This area of the hill country is full of caverns with environmentally sensitive areas which will be affected by the drainage into recharge zones for the Edwards Aquifer. This area needs to be protected. This high density development has to be prevented. Chemicals used to treat waste water can jeopardize or contaminate these sensitive areas during flooding and increased runoff due to increased infrastructure of a high density development. Watersheds flow to the recharge zone and eventually into the aquifer posing a risk to our drinking water from the Trinity / Glen Rose and Edwards Aquifer, which ultimately affects the

**TCEQ Commissioners' Integrated Database - All Comments  
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03/09/2015 11:27 AM	<u>FINCHER,KATHY</u>	Public Meeting - Request	balance of aquatic life and aquatic recreation enjoyment when there is no water to enjoy. The power of the MUD's allows for further annexation for more high density development without proper management or consideration of our natural resources jeopardizes the ability to operate long established ranches while opportunistic developers make financial gains at the expense of landowners depleted resources. Without clean quality water the legacy of the Texas hill country will be written in history as what was and lost due to improper management allowing a few to prosper. Drinking water shortages have been predicted since the mid 1960's. It's time to act to preserve our resource of clean drinking water.
03/07/2015 12:05 PM	<u>SYAMKEN,SUSAN</u>	Public Meeting - Request	I request a public meeting. There are numerous environmental questions we have about this matter. I am very concerned how it will affect the Edwards Aquifer, flooding and the environment.
03/07/2015 7:58 AM	<u>LAUBACH,CARA</u>	Public Meeting - Request	We request a public meeting to discuss the serious water implications of the proposed waste water treatment plan on the Meyer Ranch in Comal County. We live and own land close to this property and we are concerned about future well water quality and continuance for our family.
03/07/2015 4:55 AM	<u>LAUBACH,KENNETH C</u>	Public Meeting - Request	Dear Sir or Madam, I would like to please request a public meeting for the above-referenced permit. Thank you.
03/06/2015 7:33 PM	<u>LAUBACH,CALLI</u>	Public Meeting - Request	I want to request a public meeting to disapprove this application permit. The environmentally sensitive area should not have high density development creating effluent discharging into the bordering Edwards Aquifer Recharge Zone.
			I would like to request a public meeting for this. I am requesting a public meeting regarding the South Cranes Mill permit. I have concerns for contamination of our well and availability of our drinking water with the proposed high density South Cranes Mill subdivision bordering the Edwards Aquifer Recharge zone. Dense populations create high water usage demands and lower the water table and availability of groundwater resources while increasing effluent waste being discharged into the neighboring Dry Comal Creek. This area of the hill country is full of

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

			<p>caverns with environmentally sensitive areas which will be affected by the drainage into recharge zones for the Edwards Aquifer. This area needs to be protected. This high density development has to be prevented. Chemicals used to treat waste water can jeopardize or contaminate these sensitive areas during flooding and increased runoff due to increased infrastructure of a high density development. Watersheds flow to the recharge zone and eventually into the aquifer posing a risk to our drinking water from the Trinity / Glen Rose and Edwards Aquifer, which ultimately affects the balance of aquatic life and aquatic recreation enjoyment when there is no water to enjoy. The power of the MUD's allows for further annexation for more high density development without proper management or consideration of our natural resources which can be depleted with the developers making financial gains at the expense of landowners depleted resources. Without clean quality water the legacy of the Texas hill country will be written in history as what was and lost due to improper management allowing a few to prosper. Drinking water shortages have been predicted since the mid 1960's. It's time to act to preserve our resource of clean drinking water.</p>
<p>03/06/2015 7:21 PM</p>	<p><u>LAUBACH,CLINT</u></p>	<p>Public Meeting - Request</p>	<p>I would like to request a public meeting regarding this. I am requesting a public meeting regarding the South Cranes Mill permit. I have concerns for contamination of our well and availability of our drinking water with the proposed high density South Cranes Mill subdivision bordering the Edwards Aquifer Recharge zone. Dense populations create high water usage demands and lower the water table and availability of groundwater resources while increasing effluent waste being discharged into the neighboring Dry Comal Creek. This area of the hill country is full of caverns with environmentally sensitive areas which will be affected by the drainage into recharge zones for the Edwards Aquifer. This area needs to be protected. This high density development has to be prevented. Chemicals used to treat waste water can jeopardize or contaminate these sensitive areas during flooding and increased runoff due to increased infrastructure of a high density development. Watersheds flow to the recharge zone and eventually into the aquifer posing a risk to our drinking</p>

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03/06/2015 4:5  
8 PM

LAUBACH,VICTORIA B

Public  
Meeting -  
Request

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			history as what was and lost due to improper management allowing a few to prosper. Drinking water shortages have been predicted since the mid 1960's. It's time to act to preserve our resource of clean drinking water.
03/06/2015 4:14 PM	<u>PAPPAS,NANCY</u>	Public Meeting - Request	I request a PUBLIC MEETING regarding the Meyer Ranch proposal.
03/06/2015 12:50 PM	<u>HIGBY,KENNETH</u>	Public Meeting - Request	I would like to request a public meeting regarding the above permit.
03/06/2015 9:33 AM	<u>WHITE,AURORA DOZIER</u>	Public Meeting - Request	I REQUEST A PUBLIC MEETING. Thank you.
03/06/2015 7:50 AM	<u>MARTIN,TAYLOR</u>	Public Meeting - Request	I request a public meeting on this permit application.
03/04/2015 9:47 AM	<u>LAUBACH,VICTORIA B</u>	Hearing Request	This is a request for public hearing
03/04/2015 9:29 AM	<u>MARTIN,TED M</u>	Public Meeting - Request	REQUEST PUBLIC MEETING
03/04/2015 9:22 AM	<u>MARTIN,ELIZABETH L</u>	Public Meeting - Request	Request Public Meeting
03/04/2015 9:04 AM	<u>LAMB,RICHARD</u>	Hearing Request	I respectfully request a public hearing on this application.As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the construction and operation of this waste treatment facility • An increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very

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03/03/2015 8:1 7 PM	<u>PEYTON.SANDY</u>	Hearing Request	<p>close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.</p> <p>I respectfully request a public hearing on this application.As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the construction and operation of this waste treatment facility • An increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.</p>
03/03/2015 8:1 3 PM	<u>PEYTON.RICK</u>	Hearing Request	<p>I respectfully request a public hearing on this application.As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the construction and operation of this waste treatment facility • An increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.</p>
03/03/2015 7:0 8 PM	<u>AMAYA.SABRINA</u> <u>HOUSER</u>	Hearing Request	We request a 'PUBLIC HEARING" of this permit prior to it's approval.
02/24/2015 12: 15 PM	<u>PEYTON.RICK</u>	Comment - Written	As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to

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			<p>the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the construction and operation of this waste treatment facility • An increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.</p>
02/23/2015 11:05 AM	<u>HUBLER,SHARON</u> <u>ELAINE</u>	Hearing Request	<p>The potential damage to the environment and Edwards Aquifer through accidents of spillage of raw sewage and other impurities in the Edwards recharge zone. A hearing on this matter is requested.</p>
02/22/2015 10:25 PM	<u>COLEMAN,KEVIN</u>	Public Meeting - Request	<p>I am very concerned about 390,000 gallons of waste water discharging into the Dry Comal Creek every day. Will there be an environmental impact study done before this is approved? This waste water will make it's way to the Edwards Aquifer and the Comal River. It will also drive down the value of my home. I am certain that you would not want a waste water facility built next to your home. Is the money of a developer more important than the lives of Texas citizens and the environment we enjoy? As a tax paying American and a former soldier in the military who has sacrificed years of my life for your welfare, I humbly ask that this application to pollute the area be rejected. I also request a public meeting.</p>
02/21/2015 10:46 AM	<u>GLASS,E DWAIN</u>	Comment - Written	<p>With the effluent from the treatment plant going to the Edwards &amp; Trinity (via the Glen Rose) Aquifers,I am concerned about how the Operator will ensured that the water which is discharged daily is treated to a point where it is not going to contaminate the drinking water when it percolates into the aquafers. Not only on a daily basis, but what about after a brief but heavy rain? Will this facility have enough storage to hold the discharge on site until no further flooding is threatened? And finally, who will be responsible for making sure all discharge water meets the</p>

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02/21/2015 6:03 AM

DUNLAP,SUSAN L

Hearing Request

specifications of the permit and who has oversight to ensure their compliance.

I am requesting a public hearing on this permit. We are on well water and there is impact to our health and welfare if this goes forward. If this permit is approved it would have a devastating impact on the established residences in this area. This really needs to go to a public hearing.

I would like to ask for a PUBLIC HEARING regarding the permit filed to build a Sewage Treatment Facility that is expected to discharge approximately 390,000 gallons of treated sewage into Dry Comal Creek off S. Cranes Mill Rd in New Braunfels, TX. I am concerned about its possible effects on the Edwards Aquifer, which is underneath of this proposed development area. The Edwards Aquifer and land that is above it is an environmentally sensitive area with caves, natural springs and abundant wildlife. The system being proposed in the application is nothing more than a few commercial " Aerobic " systems chained together with filters and chlorination. The daily spillover of a Sewage treatment plant discharging into the creek and flowing onto property owners land and then into the Comal River would have ramifications that effect health as well as the environment. There are also flooding concerns. The Dry Comal Creek traverses through a 100 year flood plain and is subject to several flash floods per year. I believe an environmental study is warranted to understand the effects of the proposed Sewage Treatment Facility on the Edwards Aquifer and surrounding environment to understand if such a development is feasible as proposed.

02/20/2015 11:28 AM

BARNHILL,TERESSA

Hearing Request

I live in the Vintage Oaks subdivision on a little over an acre. I am required to provide my own septic system and disperse the effluent over a portion of my backyard. I am concerned with the amount of effluent that will be dispersed into the Dry Comal Creek, eventually finding it's way into the Edward's aquifer. Please reconsider this permit, or at the very least, give those of us who care about the aquifer and Dry Comal Creek an opportunity to voice our concerns. Thank you.

02/18/2015 4:43 PM

WHITE,RORI

Comment - Written

02/18/2015 4:1

HUBLER,EDMUND O

Hearing

I am opposed to having treated waste water in the Dry

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7 PM		Request	Comal Creek which runs thru the Edwards Aquifer. The daily volume of 390,000 gallons of waste water would be prone to accidents and have substantial probability of contaminating the Edwards Aquifer. Please have a public hearing/s on this permit to make sure all concerns of the local citizens are addressed.
02/18/2015 8:15 AM	<u>INGRAM,SUSAN</u>	Hearing Request	I am very concerned about the probable contamination of the Edwards Aquifer and problems with flooding from this project. I request a public hearing on this matter.
02/17/2015 9:24 AM	<u>PAPPAS,R</u>	Hearing Request	Our property borders the Meyer ranch and I am extremely opposed to a development of high density development that will require a waste water treatment plant. The proposed discharge into the Dry Comal Creek, which is in the Edwards aquifer recharge zone, is environmentally unacceptable. This permit has potential to directly impact our well water quality. I am requesting a contested case hearing.
02/17/2015 5:47 AM	<u>HARRIS,EDWARD</u>	Hearing Request	I have attached a Word Document to this comment with pictures which were taken approximately 1500 feet south of where Dry Comal Creek exits proposed Meyer Ranch subdivision and proposed Sewage Treatment Facility would be located. The content of these pictures; perennial pools, springs weeping from limestone, collapsed karst formations are important for the commissioners and staff of TCEQ to understand the impact of adding treated sewage effluent into the West Fork of Dry Comal Creek would be devastating. These pictures repeat themselves many times over as the West Fork of Dry Comal Creek combines with the main branch of dry Comal creek and then into the Comal river. According to the USGS the Dry Comal Creek watershed is 107 square miles. If TCEQ allows this Sewage treatment facility others will follow. Which will impact the Edwards Aquifer Recharge and eventually Artesian Zone downstream as time goes by. I request a public hearing on this matter.
02/10/2015 11:28 PM	<u>COLLINS,AMY E</u>	Comment - Written	My name is Amy Collins and I live at 1470 S. Cranes Mill Road. I am protesting the Proposed Permit No. WQ0015314001. This permit contains many flaws pertaining to the affected areas that will impact many more families and business than what they are saying. I was not

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considered to be in the affected (by their assessment) area so I was not legally notified of the proposed permit. This goes against my legal right to be informed, and the person who put this permit together should be fined. After reviewing the neighbors list submitted with the applications it showed many inaccuracies. The permit states that Dry Comal Creek only runs for a few miles (few means 2 or 3). Dry Comal Creek goes all the way in to down town New Braunfels and empties into the Comal River at Wurst Hall, in actuality, it is over 35 miles long so their assessment is incorrect. Dry Comal Creek runs on 2 full sides of my property that is 900 feet long by 600 feet wide, so I will be tremendously affected myself and my family. I live less than 1500 feet from the proposed area where the Chemical sewage discharge plant will be. I also have a large living cave that is in the Dry Comal Creek bed on my property. Dry Comal creek is a Dry Creek 95% of the year. Any natural flow of water will enter the cave area. I have a cavern system under my property, which we discovered when we drilled for my well. The cavern is a porous system of limestone rock which will eventually connect to the Edwards Aquifer at some point it will be in contact with the Edwards Recharge Zone. It is illegal to dump straight discharge over the Edwards Aquifer. Even though they are trying to bypass the Edwards Aquifer by pumping farther up the Creek bed, it still will run down to the Edwards Aquifer recharge zone. Signs for the Edwards Aquifer Recharge Zone are a half mile up the road from my property. As dictated by the Permit the Discharge System will be discharging 390,000 gallons "average" per a day which means it is going to more

We are Charlie & Amy Collins, we own a business on 1470 S. Cranes Mill Road, The Gardens of Cranesbury View. This is a wedding venue that is built around a 3 acre formal garden. The ceremonies take place outside in the formal gardens. I am protesting the Proposed Permit No. WQ0015314001. My business was not considered to be in the affected (by their assessment) area so I was not legally notified of the proposed permit. This goes against my legal right to be informed, and the person who put this permit together should be fined. The Chemical Sewage Discharge plant will affect my business in many ways. I have a

02/10/2015 11:  
20 PM

COLLINS, AMY E

Comment -  
Written

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			<p>bachelor's degree in Science with a concentration in Ornamental Horticulture, so I know what damages this chemical discharge will create with my landscaped gardens. My garden is maintained using organic solutions, because it is the best for the environment and the best for my gardens. Spray out of chemically treated sewage has regulations that we as business have to abide by. I expect new development to abide by the same rules as our business. Spray out that goes out to a fielded area will kill or create fungal diseases with everything it comes in contact with. This is why the regulations of spray out need to be far enough away from any home dwelling or open water ways. This proposed permit is not suggesting spray out, it is wanting to do straight chemically treated sewage into Dry Comal Creek which will filtrate into the Edwards Aquifer Recharge Zone. The permit states that Dry Comal Creek only runs for a few miles (few means 2 or 3). Dry Comal Creek goes all the way in to down town New Braunfels and empties into the Comal River at Wurst Hall, in actuality, it is over 20-30 miles long so their assessment is incorrect. Dry Comal Creek runs on 2 full sides of my property that is 900 feet long by 600 feet wide, so my business will be tremendously affected. The business is less than 300 feet from the proposed area where the Chemical sewage disch <u>more</u></p>
02/10/2015 2:44 PM	<u>SMITH,JESSICA</u>	Hearing Request	<p>We own a property at 1723 Herbelin Rd., New Braunfels, TX 786130, (on the other side of Hwy. 46 from the proposed site)and we would like to petition to have a public hearing about the proposed Waste Water Treatment Plant. We would like to hear all of the facts and voice our concerns if there are any. We own a venue business and would like to be able do defend the future of that business if needs be. Thank you.</p>
02/09/2015 12:08 PM	<u>WHITMORE,JAMES A</u>	Hearing Request	<p>Waggener Ranch is a gated 830 acre community located at 4802 South Cranes Mill Road in close proximity to the proposed sewage plant. Although we are not opposed to development in the area, we do have several concerns that need to be addressed before this permit is granted. First, it is our understanding that this new facility may produce more than 350,000 gallons of daily effluent that will be discharged into the Dry Comal Creek area. Will this</p>

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discharge be treated to drinking water quality with no odor to minimize any adverse environmental affects on the Edwards Aquifer Recharge Zone? Second, will the increased truck traffic needed to service the plant require widening of South Cranes Mill Road? If so, what is the timing? Third, if the Meyer Ranch development being serviced by this facility uses the water supply utility (Canyon Lake Water Services Company), where will they tap into existing main water lines? Is their water source Canyon Lake or wells that tap into the Edwards Aquifer and/or Trinity/Glen Rose Aquifer? Any environmental impact study required before issuing a permit to supply water? These are just a few of the many questions our residents have with respect to the new sewage treatment plant. I believe a public hearing to fully discuss Comal County resident concerns is appropriate.

My knowledge of the Meyer Ranch permit is limited to the facts as reported in the New Braunfels Herald-Zeitung. It appears to me that the permit request, and certainly the potential approval of same, represent an example of unbridled, hasty, and ill-conceived development. The functioning of this so-called "sewage treatment" operation will burden surrounding residents and commercial and agricultural interests. The roads in the area are not designed for-nor capable of handling-the heavy truck traffic this transfer station will require. Development should take place in a more sensible fashion. Roads and infrastructure need to be in place, or at least in the pipeline, before permits are issued. The interests of previously-established residents and businesses trump the wishes of the realtors and developers with dollar signs in their eyes. This scheme attempts an end run around the Comal County rules for minimum lot size/septic system viability in rural areas. I urge the TCEQ and the Comal County Commissioners to reject this permit request.

I request that the TCEQ hold a public meeting on this permit in the area to allow maximum participation from the community. The permit application like several others in the area represents a violation of Chapter 213 Edwards aquifer protection rules. This permit would be rejected if the applicant was proposing to pipe the effluent from their

02/09/2015 8:56 AM MCCHESENEY.MICHAEL Comment - Written

02/08/2015 10:51 PM GRAHAM.TERRELL Public Meeting - Request

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		<p>plant into the recharge zone. Using the Dry Comal Creek as a conduit is not any different than utilizing a pipe. The Dry Comal Creek is not a waterbody and no mixing or dilution of the effluent will take place prior to it reaching the recharge zone the vast majority of the time.</p>
<p>02/08/2015 12:09 PM</p>	<p><u>TERAO,CONNIE</u></p>	<p>Hearing Request</p> <p>I am writing to request a public hearing in regards to the above permit request WQ0015314001, a proposal for a waste water treatment plant in Comal County of the Edwards Aquifer Recharge Zone. The proposed plant is for the benefit of one at the expense of many. The proposed plant will have negative effects on the environment and all the people, plants and animals that call this area home in addition to all those that rely on the Edwards Aquifer for their water. The runoff from this plant will create flooding hazards for all of those downstream from the plant. The runoff (treated effluent) from this plant will go into the Dry Comal Creek which is a 100 year flood plain area. With the addition of more water to this flood plain area the flooding issues (flooded rural roads, homes, and the destruction of plants and animal homes) will be more frequent and more severe. The proposed plant will be located in an Edwards Aquifer Recharge Zone. If/when (accidents do happen) untreated effluent/raw sewage is released into this Recharge Zone the water of all that rely on the Edwards Aquifer for their water will be adversely affected as well as those that live in the area. Those affected will include people, plants and animals that rely on this water. Some of those plants and animals could be on the endangered species list. The plant owner cannot guarantee that all the runoff will meet water quality guidelines Accidents happen and damage will be done before it is known that the water quality has been adversely effected. The treated effluent will have negative impacts on the plants and animals that will drink the runoff. The plants will benefit the developer and the some 1500 families that will call the proposed development home but, what about the property rights of the other residents in the area that will be effected by the plant? Do they not have the right to live in an area with clean water for people, plants and animals? To live in an area that we do not hav <u>more</u></p>

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02/07/2015 11:  
08 AM

THOMAS.FELICIA S

Hearing  
Request

I have concerns regarding the "waste water treatment facility" plan under consideration for 1500 homes on what is the current Meyer's Ranch. My concerns are as follows: It is our understanding there are multiple errors with the permit application itself. I am concerned that adequate studies have not been done to determine the impact of this "waste water treatment facility" to the areas in the 100 year flood plain should a flood occur. The last time a substantial flood occurred in the area all of this was ranch land. This is not longer the case. Now there are several neighborhoods, and there are to be 1500 homes on Meyers Ranch. If this area should flood and the water should invade this aerobic treatment facility, servicing these 1500 homes what impact would it have on those homes, the surrounding homes, Dry Comal Creek and the Edwards Aquifer recharge zone and the Aquifer itself. An aerobic system of that size seems inappropriate over an Edwards Aquifer recharge zone. The possibility of a sewage spill or overflow seems high. Each home owner in this subdivision has this type of system on a smaller scale and many have already had problems. I would hate to imagine these problems on the scale that would occur to a system servicing 1500 homes and what impact this would have on the aquifer and Dry Comal Creek. Have adequate impact studies been done for Dry Comal Creek with additional amount of water being discharged? What if effluent is discharged into the creek? Will all discharged be adequately diluted? There have been reports that even the New Braunfels water treatment plants have had difficulty with this of late due to the water restrictions and low flow water devices in use. The amount of effluent that will have to be hauled out of the area will be substantial. This effluent will be hauled over a winding, narrow, two lane, dark country road. There will be a large amount of spillage (I have seen this in othe more

02/07/2015 8:0  
1 AM

HARRIS.EDWARD

Hearing  
Request

The link below is a ACRGIS presentation map of the watershed of Dry Comal Creek. Dry Comal Creek measures approximately 35 miles long. The west Fork of Dry Comal Creek starts at Key Rd and FM 3159 in Comal County and ends at the Comal River in New Braunfels. It starts in the Edwards Aquifer Contributing Zone, thru the Edwards Recharge Zone, and ends in the Edwards Aquifer Artesian Zone. Link to Map of Dry Comal Watershed:

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		<p><a href="http://bit.ly/18X4gct">http://bit.ly/18X4gct</a> We are requesting a public hearing and meeting for the residents of Comal County as the Dry Comal Creek runs through two large precincts (1 &amp; 2) and when it enters the Comal River effects all four precincts and the recreational water ways of Comal and Guadalupe rivers. Sewage treatment facilities are not 100% accident free. Without a station attendant onsite 100% of the time an accident over this environmentally sensitive area can be devastating to the private water wells, public water wells, aquifers, and rivers. Please let the voices of all the residents in the effected districts be heard above a paperwork shuffle of inadequate rules, regulations, and conflicting private (developers)and governmental interests (taxes). The repercussions of this decision should be made by the many and not just a few. I am not against development in our Comal County we have some very good ones. But we also have some very bad ones such as Johnson Ranch and the same people involved in Johnson Ranch (dispute) were authors of this water quality permit application. Comal County does not have the authority to regulate any developer's master plan before ground is broken. I have heard from county commissioners on this permit application and they have talking points such as "do you want clean water" and " what if this was your private land". It is interesting when you peel the onion back how important the Water Quality Permit is, but it is only governed by rules and <u>more</u></p>
<p>02/07/2015 8:01 AM</p>	<p><u>HARRIS,EDWARD</u></p>	<p><u>Public Meeting - Request</u></p> <p>The link below is a ACRGIS presentation map of the watershed of Dry Comal Creek. Dry Comal Creek measures approximately 35 miles long. The west Fork of Dry Comal Creek starts at Key Rd and FM 3159 in Comal County and ends at the Comal River in New Braunfels. It starts in the Edwards Aquifer Contributing Zone, thru the Edwards Recharge Zone, and ends in the Edwards Aquifer Artesian Zone. Link to Map of Dry Comal Watershed: <a href="http://bit.ly/18X4gct">http://bit.ly/18X4gct</a> We are requesting a public hearing and meeting for the residents of Comal County as the Dry Comal Creek runs through two large precincts (1 &amp; 2) and when it enters the Comal River effects all four precincts and the recreational water ways of Comal and Guadalupe rivers. Sewage treatment facilities are not 100% accident free. Without a station attendant onsite 100% of the time</p>

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We, Daniel and Michele LaRoe, object to the proposed Permit #WQ0015314001 (EPA ID #TX0135976), which would authorize the discharge of treated wastewater, and the construction of a wastewater treatment facility at 2959 S. Cranes Mill Road. The high-density housing project sited in a canyon at the origins of West Fork Dry Comal Creek at the Edwards Contribution/Recharge Demarcation, will most likely contaminate and/or kill our well, contaminate the Edwards Aquifer, disrupt and contaminate downstream livestock grazing along the West Fork Dry Comal Creek, and severely impair our property value and enjoyment. There are so many errors and material misstatements on the TCEQ application, it should be rejected out of hand. Our home (922 Homestead Ridge, on 9.886 acres) is approximately one-half mile East of the proposed 4" Forced Main Discharge Point of the facility as depicted in the application. We experience easterly winds throughout the year that would carry airborne pollutants from the discharge over our property. Persistent malodors as a nuisance can impair the value and enjoyment of any real estate, especially a home. This is one of several concerns. With the ongoing drought in our region and

02/06/2015 2:5  
8 PM

LAROE,DANIEL

Hearing  
Request

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			explosive development of Comal County, our small private well now produces no more than 110 gallons per day during the summer, and about half its original average during wet months. Most of my neighbors have experienced similar drops in production. We already severely ration our usage to compensate for this, and a subdivision with four homes per acre (1500 proposed) all on wells contiguous with ours will most probably lower the water table further rendering our well useless. The infrastructure to support high-density development necessarily produces significant impermeable ground cover, leading to increased runoff during rain events. The proposed facility is sited in a canyon next to the Edwards Contribution/Recharge demarcation. It will be subjected to <u>more</u>
02/05/2015 1:41 PM	<u>CEVALLOS,DANIEL</u>	Comment - Written	As a homeowner in the Vintage Oaks subdivision which is adjacent to this proposed sewer plant, I am very concerned. We built our home just over a year ago and had I known about this proposed plant, I would not have built here. Vintage Oaks is a beautiful subdivision with much ongoing construction of homes valued at upwards of \$400,000. I'm concerned at the impact that this proposed plant will have on the value of our homes, quality of life and the groundwater down gradient from the plant. Please do not approve this permit.
02/05/2015 11:56 AM	<u>WATROUS,JEANINE MARIE</u>	Comment - Written	My Uncle, Dr. Oliver Marcotte invented the "scum hating" septic tank. We had it on our property when we lived in Michigan as one of his test areas. It worked well and we had a garden above it that grew wonderful produce! No need for sludge trucks and NO stink! I don't think anyone has used it, but don't know. Gravity Flow Septic Tank Patent 891,551-patent given to Univ of Mich when he died. Probably no one in TX knows about it. It is environmentally friendly. I will be out of the country Feb 6-13, but can talk after that. Don't know if I'll have internet there.
02/05/2015 11:45 AM	<u>BARUCKY,JERRY</u>	Hearing Request	We are greatly concerned that the hybrid aerobic waste system proposed for the Meyer Ranch Water Control and Improvement District sewer plant is insufficient to properly treat effluent and protect area homeowners from noxious odors and possible well contamination. We

TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15

02/04/2015 7:2  
1 PM

DOOLEY  
LOGUE,SUSAN R

Hearing  
Request

request that TCEQ hold a public hearing and get testimony on this from area citizens and treatment experts.

I would like to request a public hearing for proposed permit No. WQ0015314001. My property adjoins Meyer Ranch. Dry Comal Creek extends through the mid-portion of my property before entering Frankie Meyer's ranch and the location of the sewer treatment plant will negatively affect my property environmentally due to the back wash and overflow into Dry Comal Creek, as well as detrimentally affect my land due to the obnoxious odors permeating the air and surrounding area. The sewer treatment plant would adversely affect the value of my land as well as contaminate it. Larger concerns are for the Dry Comal Creek further down the line which feed into the Comal and Guadalupe Rivers. Meyer Ranch also intends to drill several large water wells, which cannot be allowed to happen as this would deplete the aquifer and dry up the existing surrounding smaller wells on neighboring properties.

02/04/2015 6:3  
0 PM

BLODGETT,JOHN  
HUDSON

Comment -  
Written

Dear TCEQ, My name is John Blodgett and I have been a resident at Vintage Oaks since 2011. I have some concerns about the Meyers Ranch Project's short and long term plans on the development of this pristine Texas Hill Country out here around Cranes Mill Road and the Dry Comal Creek, and its effect on the St. Edwards Aquifer and those downstream on the Dry Comal Creek, including the town of New Braunfels. I support reasonable, planned development I am the President of Detex Corporation which is one of New Braunfels thriving, profitable and growing manufacturing concerns – we have been a strong contributor and community participate in New Braunfels since 1981 – I've been with Detex since 1986. I only give you this background to assure you I am a business man and community advocate. In my early bioscience (Microbiology) training at the University of Texas at Arlington we took a field trip to the huge waste water processing plant there in near the Trinity River. We observed the whole process and saw how the natural gas generated by the waste was used to power some of the operation. Last but not least we saw the effluent released into a tributary that I believe ultimately flowed into the

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

			Trinity River. The difference up there is that "highly processed" gray water was going into an active river where the effluent was immediately diluted and further acted upon by the aquatic bacteria there. The Dry Comal Creek is "DRY" almost all of the time. With a normally dry creek, there won't be the resources for effective biodegradation of the waste. As you know, this is a St. Edwards Aquifer Recharge Zone! These developers haven't done their homework/don't know understand what they are proposing - I've heard this is also proven by the errors in their permit application. They there will be 1,500 home squeezed into that small area and the plant will be dumping 390,000 gallons of waste water. That's 260 gallons per house per day! I wonder how they came up with that number. <u>more</u>
02/04/2015 10:05 AM	<u>DAVIS,NELDA S</u>	Hearing Request	I desire a hearing on this matter as I don't agree with having a waste water plant dumping waste water into the Dry Comal Creek which will eventually go into the other rivers. I think it would ruin all of the water wells nearby. The area is so porous and has caves and it would eventually leech into our water wells. It is also going to go into the Edwards Aquifer since this is the recharge zone area.
02/04/2015 9:08 AM	<u>DAVIS,RONALD R</u>	Hearing Request	I live at 1789 S Cranes Mill Rd and I am about 200 yards from the Dry Comal Creek. This dry creek is the proposed dumping area for the effluent generated by the proposed Wastewater Treatment Plant on the Meyer Ranch. This entire area is part of the Edwards Aquifer Recharge Zone. The entire area has fractures in the limestone and water or waste will seep into the Edwards Aquifer from the Dry Comal Creek. There are numerous caves in this area that have been discovered while drilling our water wells. There are a number of caves that are part of the Dry Comal Creek. I would like a hearing on this matter.
02/03/2015 9:56 PM	<u>MARKS,MARJORIE</u>	Hearing Request	My husband and I are building a home in the Vintage Oaks subdivision which is adjacent to the site for this wastewater treatment plant. We have concerns about this plant and the affect it will have on Dry Comal Creek, nearby land, and the Edwards Aquifer. We respectfully request a public hearing by the TCEQ before action is taken on this permit. Marjorie Marks

TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15

02/03/2015 7:5  
3 PM

BRAND.TROY CALVIN

Comment -  
Written

February 3, 2015 To Whom It May Concern: My name is Troy Brand, retired Air Force officer, husband for 51 years to the same wife, father of three and grandfather of 12. After retiring from 22 years of service to my Country in 1984, my wife and I decided to buy property in the country as an investment in our future and security for our future retirement, which would come 25 or so years later. We purchased part of the Meyer Ranch in 1995 as this investment and moved onto our 65 acres of beautiful Live Oak laden hill country in 1996. We finally built our dream home in 1999 and have settled in for the duration. Now – with very little warning and with a lot of “shock and awe” – we learn that a new development of homes has been approved and will be built right across South Cranes Mill road from our property entrance on the formerly-quiet and peaceful South Cranes Mill Road. And, believe it or not, we just heard that it was approved by somebody in government to build 1500 homes on only 600 acres, many of them over the Edwards Aquifer recharge zone, which we and all our neighbors have so diligently protected for the last 20 years. Considering roads and utilities and common areas on this new development, this means it is going to vastly overtax and burden the land in our neighborhood to the tune of one home every quarter acre. If there will actually be 1500 homes in this development, the load is not just fresh ground water that will be pulled from the aquifer, tremendous traffic loads for South Cranes Mill Road, or the oxygen bearing trees that will be sacrificed. There will be tons of human waste generated by 1500 families, probably at an average of 3 to 5 members in each home. All of this waste is supposed to be handled and “purified” in a new waste water plan planned to support the community. That plant is expected to expel 390,000 gallons PER DAY of gray water into our Dry Comal Creek that is adjacent to our land and that of our neighbors. Other estim more

02/03/2015 6:3  
6 PM

BRAND.PATRICIA L

Comment -  
Written

I am a landowner on S. Cranes Mill Rd. New Braunfels Tx. and I feel that a water treatment plant built on the proposed land near here would not be conducive to enhancing this neighborhood. The Dry Comal Creek that is proposed for the dumping of the treated water, runs over the road in at least one point and is indeed a dry creek.

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

		<p>only holding water when we have a deluge of rain. Also the trucking involved in transporting the sludge would be a deterrent to the area as it is a small narrow road which only accommodates people who live here and school buses. A proposed school will also increase traffic which is already at a high level.</p>
<p>02/03/2015 3:46 PM</p>	<p><u>MARTIN, TED M</u></p>	<p><u>Hearing Request</u></p> <p>Meyer Ranch Wastewater Treatment Plant Permit No. WQ0015314001 As a resident of Comal County with land adjacent to the proposed Meyer Ranch Wastewater Plant, permit #WQ0015314001, I strongly oppose the creation of this plant. My drinking water well is located in the Edwards Recharge Zone and there has been no environmental impact study done on this wastewater treatment plant to assure us there will not be any contamination. Quite frankly, I do not even know how this can even be legal to do over the Recharge Zone. Aside from my own personal well, there are residents and ranches located along the Dry Comal Creek that will be without any doubt affected by the run off generated daily from the plant. The plan for this permit needs to be looked at very closely as their numbers do not adequately reflect the amount of gallons of discharge there will actually be. In times of heavy rain these folks will be faced with flooding, not to mention harm to their livestock and crops. Now let's look at all the other detrimental aspects from this plant. The plant will require sludge haulers to remove the sewage sludge. These large trucks will need to travel down the narrow 2 lane S. Cranes Mill Rd. and enter Highway 46 at a very dangerous area just East of downhill Westbound traffic. If the trucks decide to take another route that will take them through the Vintage Oaks neighborhood where a new elementary school is to be built. So now we have potentially deadly vehicular consequences. Please protect our residents, children, water, livestock, crops, wildlife and environment and vote AGAINST approval of the Meyer Ranch Wastewater Treatment Plant. If you are "thinking" of voting yes, please visit this area in person and see for yourself if our concerns are valid. Please, please make an informed decision as this will affect so many forever. Mr. Meyer could have required the developer to build homes on no less than 1 acre and this permit and the horrible aftermath of such a tr</p>

TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15

02/03/2015 3:28 PM

MILLER,DALE

Comment -  
Written

more

Concerning the proposed effluent treatment plant off Cranes Mill Road. It is of high concern to traffic, residents and environment that this plant be built to current Tertiary standards as opposed to any sludge generating options. Transport of sludge and potentially dangerous waste product will result in significant local concern. Also concerning would be environmental as air quality impacts from discharge of liquid down stream. As this is a residential area, odors from improperly treated discharge will be offensive and intolerable as will damage to the native habitat and impact to local populations of wildlife. The plant if built would need to meet strict environmental as well as public opinion standards. Concerns with the plant location and building would be far less if current high quality and low impact standards are met..... As a homeowner in Vintage Oaks and a resident in the area of impact, I would like to express my concerns if this is not properly addressed and regulated but also express that concern would be mitigated if proper care to air quality, discharge, sludge disposal are properly addressed.

02/03/2015 2:45 PM

THOMPSON,CARL

Hearing  
Request

A full hearing needs to be held regarding the installation of this proposed sewage treatment plant. I believe that Dry Comal Creek is not suitable for discharge of waste water and a full environmental review needs to be under taken as well as a study showing possible flooding impacts resulting from the discharge of 390,000 gallons/day. The public also has the right to be allowed an opportunity to speak. All homes in this area are on septic for a reason, Dry Comal Creek is not suitable. If these developers choose to build this subdivision then it should also be on a septic system like all other homes in the area. They are merely looking for a way to lower there home prices rather than installing individual septic systems for each home. Why would you risk the Edwards Aquifer water quality for one subdivision, this very irresponsible. Further, the proposed plant is no more than a large version of a home septic system. I am surprised that it has gotten this far in the approval process, it should have already been struck down. I look forward to a full hearing and review.

02/03/2015 2:3 REIZLOFF,JASON

Comment - Having just been made aware of a WWTP that is being

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

5 PM		Written	constructed on the border of my neighborhood, I am extremely concerned that this will affect the air and water quality of the area. 300,000 gallons of grey water are proposed to be released into the Dry Comal Creek on a daily basis. Who will be monitoring the effluent to ensure it has been adequately treated on a daily basis? What type of impact will this have on the surrounding wildlife? Is an Environmental Impact Analysis available for public review?
02/03/2015 1:36 PM	<u>FINCHER, RONALD E</u>	Comment - Written	I am writing to express my deep concern about the proposed treatment facility referenced in this permit request. I live within one mile of this proposed facility. The location of this facility is directly over the Edwards Aquifer Recharge Zone and could potentially contaminate this vital source of drinking water. The location of the development that would necessitate building this treatment facility also causes concerns. The proposed development and the proposed treatment facility are in a valley that drains into the Dry Comal Creek eventually flowing into the springs area in the greater New Braunfels area. I believe this to be part of a Federally protected area for potential waste water runoff. The TCEQ has a history of not approving a potential contamination source over the EAA and I would only ask that you continue to follow that precedent. Water is our most precious resource and we must do everything in our power to protect it. Your consideration of my comments is appreciated. Ron Fincher 1505 Syrah Circle Vintage Oaks at the Vineyard New Braunfels, TX 78132 830-228-4810
02/03/2015 8:24 AM	<u>MCWILLIAMS, CAREY F</u>	Comment - Written	I would like to comment on the proposed WWTP near Vintage Oaks. We do not want the WWTP to be built causing additional truck traffic and safety issues on a road not built for congestion. We also enjoy the Texas Hill Country, 1/4 acre lots with track housing is not what the Hill Country ( Vintage Oaks) is all about. I am for growth, and have been a NB resident since 1974, however, over building in the aquifer region is a proponent for disaster. I vote NO! Carey
02/03/2015 8:07 AM	<u>LAUBACH, VICTORIA B</u>	Comment - Written	My name is Victoria Laubach, and my family members are residents of Comal County. I would like to have the TCEQ committee responsible for the future and well being of the

TCEQ Commissioners' Integrated Database - All Comments  
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water resources of the Edwards Aquifer place a stop to the proposal for this 1500 home development on this small parcel of land which would set a precedent for other similar developments over this precious resource, which when damaged would be irreversible. Let common sense prevail. Ed Harris, local resident, obtained a copy of the permit application, and found the permit application filed by Randolph Todd Company LLC of Austin for a domestic wastewater treatment facility at 2959 South Cranes Mill Road to have at least 15 errors in it, including misidentifying the route of Dry Comal Creek, saying it flows to Cibolo Creek on the Comal/Bexar county border, rather than noting its true course into New Braunfels near the Wursthof grounds and then into the Comal and Guadalupe rivers, and that it leaves out information about the environmental impact of the sewer plant on the creek, on wildlife and on downstream residents. Concerns are, if the engineers who put this permit application together have made these errors, the rest of the permit may have additional flaws. We live on Herbelin Rd where the Dry Comal Springs crosses in 2 areas. We feel we will be adversely affected by the proposed water treatment facility proposed to be located off Highway 46 on South Cranes Mill Road just west of the Vintage Oaks Subdivision , not only because of the discharge into the Dry Comal Springs but additionally with the discharge of the chemicals used to reclaim waste water into the discharge zone of the Edwards Aquifer. The plant for the proposed 1500 homes on this 735 acre development would potentially discharge a daily average of 390,000 gallons of treated effluent into the Dry Comal Creek . The Dry Comal Creek runs only when there is a significant amount of rain, and that rain goes into the cavern more

02/02/2015 6:3  
1 PM

POPE,JILL

Public  
Meeting -  
Request

Very concerned about the impact of the proposed sewage plant on South Cranes Mill Road. As a resident of Vintage Oaks, have several concerns, and hope you have a residents meeting to discuss.

02/02/2015 4:4  
4 PM

MARTIN,ELIZABETH L

Hearing  
Request

Meyer Ranch Wastewater Treatment Plant Permit No. WQ0015314001 As a resident of Comal County with land adjacent to the proposed Meyer Ranch Wastewater Plant, permit #WQ0015314001, I strongly oppose the creation of

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

			<p>this plant. My drinking water well is located in the Edwards Recharge Zone and there has been no environmental impact study done on this wastewater treatment plant to assure us there will not be any contamination. Quite frankly, I do not even know how this can even be legal to do over the Recharge Zone. Aside from my own personal well, there are residents and ranches located along the Dry Comal Creek that will be without any doubt affected by the run off generated daily from the plant. The plan for this permit needs to be looked at very closely as their numbers do not adequately reflect the amount of gallons of discharge there will actually be. In times of heavy rain these folks will be faced with flooding, not to mention harm to their livestock and crops. Now let's look at all the other detrimental aspects from this plant. The plant will require sludge haulers to remove the sewage sludge. These large trucks will need to travel down the narrow 2 lane S. Cranes Mill Rd. and enter Highway 46 at a very dangerous area just East of downhill Westbound traffic. If the trucks decide to take another route that will take them through the Vintage Oaks neighborhood where a new elementary school is to be built. So now we have potentially deadly vehicular consequences. Please protect our residents, children, water, livestock, crops, wildlife and environment and vote AGAINST approval of the Meyer Ranch Wastewater Treatment Plant. If you are "thinking" of voting yes, please visit this area in person and see for yourself if our concerns are valid. Please, please make an informed decision as this will affect so many forever. Mr. Meyer could have required the developer to build homes on no less than 1 acre and this permit and the horrible aftermath of such a tr <u>more</u></p>
<p>02/02/2015 4:31 PM</p>	<p><u>WHITTENBURG,STAN</u></p>	<p>Comment - Written</p>	<p>I am OPPOSED to the construction of a sewage treatment plant near the Dry Comal creek and Cranes Mill road. This project serves only to benefit a single developer at the cost to many property owners in the area, as well as potentially harming an environmentally sensitive area and the Edwards aquifer recharge zone. This project will lead to overdevelopment and will lead to more projects like it that will negatively impact the environment and liveability of this area.</p>

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

02/02/2015 4:08 PM

BEARD,HEATHER

Public Meeting - Request

I have concerns about the proposed water treatment facility in regards to the effect on the Edwards Aquifer as well as the effects it will have on local business and home re-sale values. I believe public discussion/vote should be brought forth to determine the impact of such facility.

02/02/2015 11:54 AM

BYRD,SUZANNE

Comment - Written

I am making a comment about permit number WQ0015314001 about a proposed sewer treatment plant on Cranes Mill Road in New Braunfels Texas. Please do not do this. This will effect our aquifer that we use for drinking water. I hope that common sense will enter in and that you will not just think of what is "good" for you but what is right for so many more. my mom and dad raised me to treat others as you would want others to treat you. I think this would help so much in making decisions. There are so many more reasons to NOT put this plant in there! I hope you understand this. sincerely, Suzanne byrd

01/31/2015 1:39 PM

RITTER.JOHN RITTER.  
PHYLLIS Y

Public Meeting - Request

We, John & Phyllis Ritter, object to the proposed Permit #WQ0015314001 (EPA ID #TX0135976), which would authorize the discharge of treated wastewater, and the construction of a wastewater treatment facility at 2959 S. Cranes Mill Road, for the following reasons: 1. Our property consists of a home and 33.62 acres, which is located directly across the road from the Frankie Meyer Ranch at 2959 S. Cranes Mill Road. We purchased this land 20+ years ago to raise and graze cattle, & we have two (2) water wells, which are used for our home & for watering our stock. During this timeframe, the dry Comal Creek has flooded many times, and our drinking water well has been contaminated from the flooding. If flooding alone can cause contamination of the wells, then where is the guarantee that the 390,000 gallons of wastewater, combined with any runoff, will be clean enough for us to drink? We know we need to get our water tested when flooding occurs, but how will we know if there is a problem when there is a daily release of this quantity of wastewater mixed with general rainfall, & who will be responsible for ensuring our water wells are safe for drinking by us and the cattle? 2. A rainfall amount of 2+ inches will fill up our stock tank and overflow at the back of our property into the dry Comal Creek. This run-off, coupled with the run-off from the Meyer ranch alone can

**TCEQ Commissioners' Integrated Database - All Comments  
for permit WQ0015314001 as of 6/18/15**

			cause the dry Comal Creek on South Cranes Mill Road to flood. What will happen to the homes & businesses along the dry Comal Creek when you add the daily 390,000 gallons of wastewater to this run-off? 3. Our property is a few hundred feet from the beginning of the Edwards Aquifer Recharge Zone. With the addition of another 1500 homes, with four (4) homes to each acre, many miles of asphalt, & another well system being drilled to supply these homes, there will be less water going into the Edwards Aquifer. When the wells go dry a <u>more</u>
01/31/2015 6:56 AM	<u>HARRIS,EDWARD</u>	<u>Hearing Request</u>	I am requesting a public hearing on this permit application. I have also attached a newspaper article from the local Herald-Zeitung during a public comment session during the Comal County Commissioners court meeting held on 8:30AM Thursday January 29th 2015. The newspaper article came out in print and online on Friday January 30th 2015.
01/30/2015 11:26 AM	<u>WATKINS,G F</u>	<u>Public Meeting - Request</u>	See Attachment
01/30/2015 10:55 AM	<u>WAGNER,LOUANN</u>	<u>Comment - Written</u>	I am shocked to learn that the TCEQ is considering the approval of a waste water treatment plant on on south cranes mill road. The approval of this plant will pave the way for a 1500 home (on 600 acres) subdivision plan that sits over the Edwards aquifer recharge zone. All of the property owners along the dry Comal creek have caves, caverns, and sink holes on our property. This has the potential to be an environmental disaster. Were there no studies done? Even TXDOT wouldn't widen the hwy over this area because of the environmental repercussions. You are not looking at this project in its entirety and approving this permit will set in place a series of actions that we will all pay for for years to come. I beg of you - please deny this permit.
01/29/2015 6:38 PM	<u>HARRIS,EDWARD</u>	<u>Comment - Written</u>	I found the application to be incomplete and many errors relating to the flow of Dry Comal Creek. Each page of this was signed by a certified engineer and they should be given notice of incomplete workmanship or fined. If the commission is expect to rule on an application then it should be technically correct. All the people that checked

**TCEQ Commissioners' Integrated Database - All Comments  
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01/28/2015 9:07 AM	<u>HENDERSON,COREY</u>	Comment - Written	<p>this and review the application should be chastise. Why should the people fighting the application have to correct the errors. Please see attached PDF for major errors on how the creek flows and what bodies it flows into.</p> <p>There is only one reason a solid waste treatment plant would be desired in a land development project...High density home building. The area this project is being developed has been and continues to dominantly be farm land, dependant upon not only surface water but ground water from the Edwards and other aquifers for livestock propitiation as well and domestic use for the local ranchers and their families. Adding a proposed 1500 homes to this area with the latent burdens that are associated with this type of population density will not only effect the safety of the local livestock that so delicately provides sometimes the sole form of sustenance for these ranches, but the burden on the available ground water could very well be devastating. Add to that, the potential for "treated" grey water from a solid waste treatment plant dumping an "estimated" 390,000 gallons of water into a DRY creek that is directly over the Edwards aquifer recharge zone, and we have a recipe for disaster. Endangering livestock by polluting the local ground water is a fight you don't want to be confronted with; but endangering HUMAN lives and the livelihood of countless families is a fight you will not win....</p>
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1 - 100 | 101 - 105

**Related Links:**

RECEIVED

APPROXIMATE

# Keeping Our Water Blue

A Moral Dilemma To a Real Problem

The logo for the Texas Commission on Environmental Quality (TCEQ) is displayed in a stylized font, appearing to be part of a larger graphic element that resembles a folded piece of paper or a banner. The letters are bold and black.

# It's Your Duty to Protect State's Public Health and Natural Resources

- This Permit Request Does NOT fulfill that duty
  - Builders can do almost whatever they like on sensitive properties adjacent to the Recharge Zone
  - Continuous dumping of 'non-potable' treated effluent affects the Edwards Aquifer water quality thus negatively affecting water used by wildlife and for cattle, crop irrigation and county drinking water!
  - Dumps 390,000 gallons into an 'unclassified' water course that is 'dry' most of the time.
  - Impact downstream - Notwithstanding the amount of non-potable water, the Dry Comal Creek is a watershed creek for flood waters, thus ending up in the Comal River for which New Braunfels tourism heavily relies.

# West Fork Dry Comal Creek Watershed

Proposed Treatment Plant

Dry Comal Creek Vineyard

Normal Condition

Wet Condition



**Legend**

USGS Streamflow  
 5 ft  
 10 ft  
 15 ft  
 20 ft  
 25 ft  
 30 ft  
 35 ft  
 40 ft  
 45 ft  
 50 ft  
 55 ft  
 60 ft  
 65 ft  
 70 ft  
 75 ft  
 80 ft  
 85 ft  
 90 ft  
 95 ft  
 100 ft

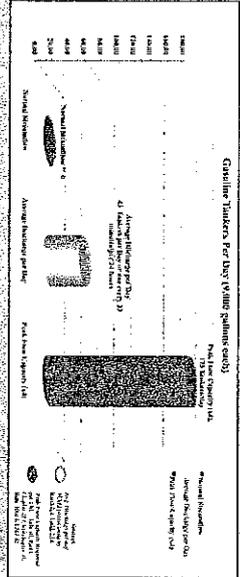
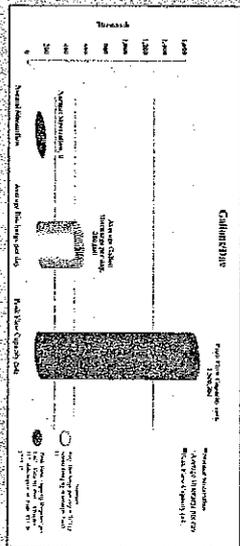
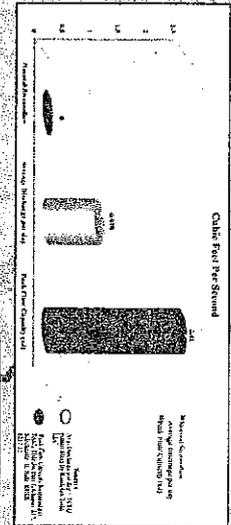
USGS Streamflow  
 FEMA FIRM 03  
 1% Flood Zone (100 year)  
 5% Flood Zone (200 year)  
 10% Flood Zone (500 year)  
 1% ADFR Zone (100 year)  
 5% ADFR Zone (200 year)  
 10% ADFR Zone (500 year)  
 1% RCH Zone (100 year)  
 5% RCH Zone (200 year)  
 10% RCH Zone (500 year)  
 1% ADFR Zone (100 year)  
 5% ADFR Zone (200 year)  
 10% ADFR Zone (500 year)



# West Fork Dry Comal Creek - Comal Creek Watershed

## Where would all the wastewater go?

Proposed Wastewater Treatment Plant



**Legend**

USGS Stream Flow

- 100
- 200
- 300
- 400
- 500
- 600
- 700
- 800
- 900
- 1000
- 1100
- 1200
- 1300
- 1400
- 1500
- 1600
- 1700
- 1800
- 1900
- 2000

**Watersheds: TWDS**

Year 2000 Watershed Boundary Lines

**Aquifer Zone**

Permian (Pre-Overland Zone)

Roadway Zone

Artificial Zone

Urban Sprawl (Excluded Aquifer Characteristics)

1% Flood Zone (100 year)

100 Year Flood

**WYPOINT MAPPING**



Upper Santa Clara Creek

Long Creek-Guadalupe River

Comal River

Landa Park

Guadalupe River

Dry Comal River-Guadalupe River

West Fork Dry Comal Creek-Comal Creek

Headwaters West Fork Dry Comal Creek

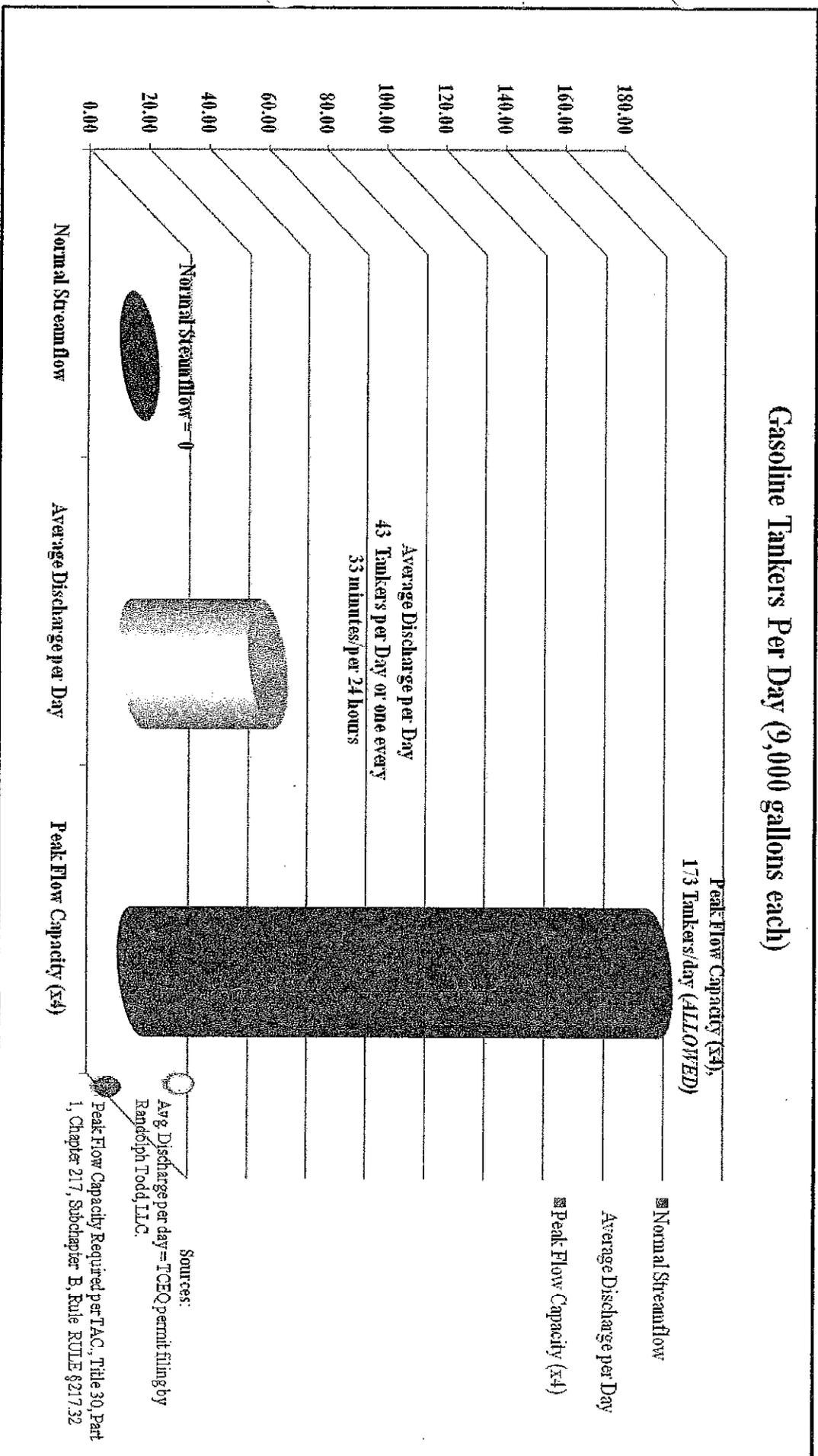
Clear Fork-Cibola Creek

Elm Creek-Guadalupe River

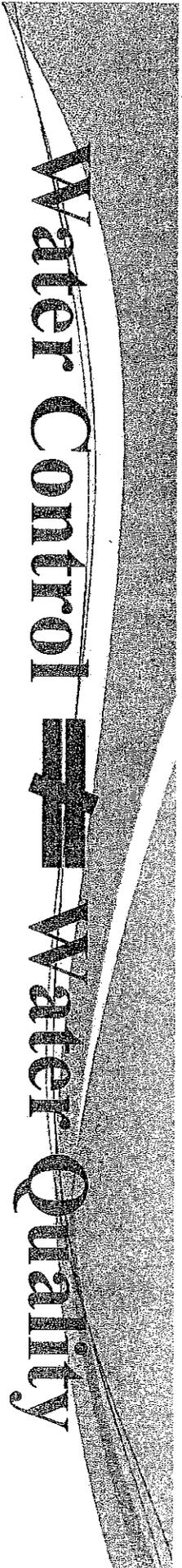
Alligator Creek

# TCEQ. It's Your Duty to Protect The State's Public Health and Natural Resources

Gasoline Tankers Per Day (9,000 gallons each)



Sources:  
 Avg Discharge per day = TCEQ permit filing by Randolph Todd, LLC.  
 Peak Flow Capacity Required per TAC, Title 30, Part 1, Chapter 217, Subchapter B, Rule RULE §217.32



# Water Control ↔ Water Quality

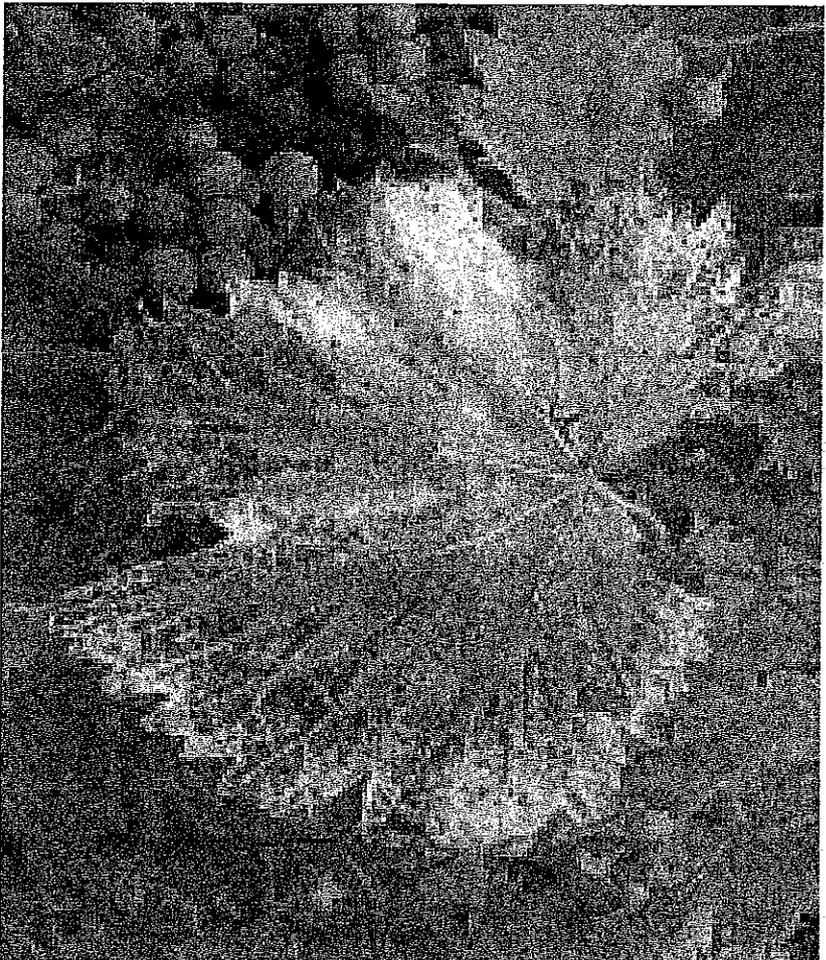
- Although scientific measurements are used to define water quality, it is not a simple thing to say “that water is good” or “that water is bad.”
- The determination is typically made relative to the purpose of the water – is it for drinking or to wash a car with or for some other purpose?
- **Poor water quality can pose a health risk for people.**
- **Poor water quality can also pose a health risk for ecosystems**



## *Effects to Dry Comal Creek Vineyards of This Permit*

- Increased waste water discharge into the Edwards Aquifer
  - Result in eutrophication – an excess of nutrients (i.e. Phosphorous), producing an increase in microorganisms and algae and depression in oxygen
    - Impact the quality of our soil and grapes. There is a fine line of the types and quantities of minerals needed for maximum quality and quantity production
    - We routinely sample our soil to ensure that the proper nutrients and their levels are present.

# Overly Phosphorous Affected Grapevine



When plants get too much potassium, the absorption of other nutrients is inhibited, which leads to the symptoms caused by the deficiency of these nutrients (Nitrogen, Magnesium, Manganese).

The Remedy: adding MORE fertilizer to address these deficiencies.

Remedy impacts the Edwards Aquifer

## *Dry Comal Creek River Segments 1811 vs. 1811-A*

- *The facility will be located at 2959 South Cranes Mill Road, in Comal County, Texas 78132. The treated effluent will be discharged to Dry Comal Creek; thence to Comal River in Segment No. 1811 of the Guadalupe River Basin. The unclassified receiving water use is minimal aquatic life use for Dry Comal Creek. The designated uses for Segment No. 1811 are high aquatic life use, public water supply, aquifer protection, and primary contact recreation*
- *Segment 1811: From the confluence with the Guadalupe River in Comal County to Klingemann St in New Braunfels in Comal County and is 4 miles long.*

## ~~Dry Comal Creek River Segments 1811 vs. 1811-A~~

- *The facility will be located at 2959 South Cranes Mill Road, in Comal County, Texas 78132. The treated effluent will be discharged to Dry Comal Creek; thence to Comal River in Segment No. 1811 of the Guadalupe River Basin. The unclassified receiving water use is minimal aquatic life use for Dry Comal Creek. The designated uses for Segment No. 1811 are high aquatic life use, public water supply, aquifer protection, and primary contact recreation*
- *The ‘true’ outfall of the treated effluent is on river segment 1811-A, not 1811, as alluded to in the permit.*
- *Permit sites address as 2959 S. Cranes Mill Rd which is in Segment 1811-A: From the confluence of the Comal River in NB in CC to upstream perennial portion of the stream southwest of NB in CC and is 30 miles long.*
- *Why was the true River Segment of 1811-A not considered in review by the TCEQ when this segment has since 2000 been identified as a Category 5 for bacteria?*

# Dry Comal Creek River Segment 1811-A has been cited with Category 5c bacterial levels in 2010

**SegID: 1811A**    Dry Comal Creek (unclassified water body)

From the confluence of the Comal River in New Braunfels in Comal County to the upstream perennial portion of the stream southwest of New Braunfels in Comal County

<u>Parameter(s)</u>	<u>Category</u>	<u>Year Segment First Listed</u>
bacteria	5c	2010
1811A_01	Lower 25 miles of water body	

Category 5: The water body does not meet applicable water quality standards or is threatened for one or more designated uses by one or more pollutants.  
 Category 5c - Additional data or information will be collected and/or evaluated for one or more parameters before a management strategy is selected.

# Dry Comal Creek River Segment 1811-A has been cited with Category 5c bacterial levels in 2014 (draft)

**SegID: 1811A Dry Comal Creek**  
 From the confluence of the Comal River in New Braunfels in Comal County to the upstream perennial portion of the stream southwest of New Braunfels in Comal County

<u>Parameter(s)</u>	<u>Category</u>	<u>Year Segment First Listed</u>
bacteria	5c	2010
1811A_01	Lower 25 miles of water body	

Category 5: The water body does not meet applicable water quality standards or is threatened for one or more designated uses by one or more pollutants.  
 Category 5c - Additional data or information will be collected and/or evaluated for one or more parameters before a management strategy is selected.

Edwards Aquifer Contributing Zone

2959 S. Cranes Mill Rd  
"Outfall Location"

~0.8 miles btwn plant  
and outfall

Edwards Aquifer Recharge Zone

Estimated  
"Plant Location"

San Antonio County, Texas



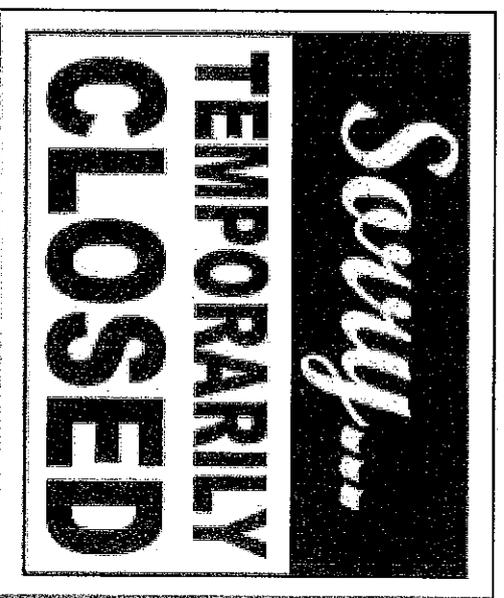
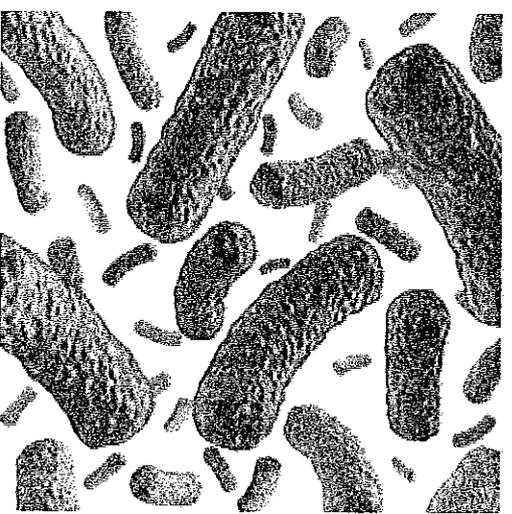
Small



## Effects on Dry Comal Creek Vineyards of This Permit

- Increased waste water discharge into the River Segment 1811-A (Dry Comal Creek – unclassified) and the Edwards Aquifer
  - Increases the likelihood of *E-Coli* in the water supply which is used in irrigation of a food product and for drinking water for our customers and employees in our business
  - The winery is required by the Comal County Health Department to test our water for E-Coli
  - Upon positive results, the winery will be shut down immediately until it's source is identified and remedied.
  - How do you remedy E-Coli in waste water effluent without a lot of time and money?

# Effects on Dry Comal Creek Vineyards of This Permit



The presence of *E. coli* in water is a strong indication  
of sewage contamination

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, April 27, 2015 8:22 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com) [mailto:[sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com)]  
**Sent:** Sunday, April 26, 2015 8:42 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
a loose*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Sabrina Houser Amaya

**E-MAIL:** [sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com)

**COMPANY:** Dry Comal Creek Vinyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8308854076

**FAX:** 8308854076

**COMMENTS:** I respectfully request that TCEQ allow a 'public meeting' of this proposed waste water treatment plant. It has already been determined that the formation of a WCID is not necessary, and therefore this petition to continue is not necessary.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, January 28, 2015 8:53 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

*mwd  
96056*

**From:** [sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com) [<mailto:sabrina@drycomalcreek.com>]  
**Sent:** Tuesday, January 27, 2015 7:30 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Sabrina Houser Amaya

**E-MAIL:** [sabrina@drycomalcreek.com](mailto:sabrina@drycomalcreek.com)

**COMPANY:** Dry Comal Creek Vineyards

**ADDRESS:** 1741 HERBELIN RD  
NEW BRAUNFELS TX 78132-1838

**PHONE:** 8308854076

**FAX:** 8308854124

**COMMENTS:** As a property and business owner (Dry Comal Creek Vineyards), by which both are bordered by the Dry Comal Creek, I was not notified of this permit request. I do not approve of this permit request.

*mw*

Interested Person

Number 180692

Request Received Date 02/18/2015

Last Polling Date

Legislator

Comment

Empty comment box

Individual

Concerned Citizen Last Name HUBLER Suffix Prefix First Name EDMUND

Middle Name 0 Title

Organization RETIRED  More

Address

Building/Mail Drop  Interagency  Valid

Detail Street/PO Box 692 ROCK CASTLE

City CANYON LAKE State TX Zip 78133 - 4844

Country UNITED STATES Foreign Postal Code  More

Phone Number/Email ID

Phone Country Code Area Code 830 Number 6603491 Extension Updated 02/18/2015

Fax Country Code Area Code Number Extension Updated

Email ID edhubler@gvvc.com Updated 02/18/2015

Delivery Method

Type

Date  Time   AM  PM

Acknowledgment Date

I am opposed to having treated waste water in the Dry Comal Creek which runs thru the Edwards Aquifer. The daily volume of 390,000 gallons of waste water would be prone to accidents and have substantial probability of contaminating the Edwards Aquifer. Please have a public hearing/s on this permit to make sure all concerns of the local citizens are addressed.

Documents

Prev

Next

Save

Cancel

Print

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 24, 2015 11:02 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [sehubler@gvtc.com](mailto:sehubler@gvtc.com) [<mailto:sehubler@gvtc.com>]  
**Sent:** Monday, February 23, 2015 11:05 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
26056*

**REGULATED ENTITY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Sharon Elaine Hubler

**E-MAIL:** [sehubler@gvtc.com](mailto:sehubler@gvtc.com)

**COMPANY:**

**ADDRESS:** 692 ROCK CASTLE  
CANYON LAKE TX 78133-4844

**PHONE:** 8306603492

**FAX:**

**COMMENTS:** The potential damage to the environment and Edwards Aquifer through accidents of spillage of raw sewage and other impurities in the Edwards recharge zone. A hearing on this matter is requested.

*mw*

Interested Person

Number 180670

Request Received Date 02/18/2015

Last Polling Date

Legislator

Comment

Individual

Concerned Citizen Last Name INGRAM Suffix Prefix HON First Name SUSAN

Middle Name Title

Organization

Address

Building/Mail Drop  Interagency  Valid

Detail

Street/PO Box 29751 TWIN CREEKS DR

City BULVERDE State TX Zip 78163 - 2407

Country UNITED STATES Foreign Postal Code

Phone Number/Email ID

Phone Country Code Area Code 210 Number 2263232 Extension Updated 02/18/2015

Fax Country Code Area Code Number Extension Updated

Email ID ingthingram@yahoo.com Updated 02/18/2015

Delivery Method

Type

Date  Time   AM  PM

Acknowledgment Date

I am very concerned about the probable contamination of the Edwards Aquifer and problems with flooding from this project. I request a public hearing on this matter.

Documents

Prev

Next

Save

Cancel

Print

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 04, 2015 9:25 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [lambre@gvtc.com](mailto:lambre@gvtc.com) [<mailto:lambre@gvtc.com>]  
**Sent:** Wednesday, March 04, 2015 9:05 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
94054*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** Richard Lamb

**E-MAIL:** [lambre@gvtc.com](mailto:lambre@gvtc.com)

**COMPANY:**

**ADDRESS:** 1504 VINO CIR  
NEW BRAUNFELS TX 78132-2771

**PHONE:** 8308852867

**FAX:**

**COMMENTS:** I respectfully request a public hearing on this application. As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the

*MW*

construction and operation of this waste treatment facility • An increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 09, 2015 8:45 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** alumatrek@yahoo.com [mailto:alumatrek@yahoo.com]  
**Sent:** Friday, February 06, 2015 2:59 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Daniel LaRoe

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

**COMPANY:**

**ADDRESS:** 922 HOMESTEAD RDG  
NEW BRAUNFELS TX 78132-1644

**PHONE:** 2103918251

**FAX:**

**COMMENTS:** We, Daniel and Michele LaRoe, object to the proposed Permit #WQ0015314001 (EPA ID #TX0135976), which would authorize the discharge of treated wastewater, and the construction of a wastewater treatment facility at 2959 S. Cranes Mill Road. The high-density housing project sited in a canyon at the origins of West Fork Dry Comal Creek at the Edwards Contribution/Recharge Demarcation, will most likely contaminate and/or kill our well, contaminate the Edwards Aquifer, disrupt and contaminate downstream

*DL*

livestock grazing along the West Fork Dry Comal Creek, and severely impair our property value and enjoyment. There are so many errors and material misstatements on the TCEQ application, it should be rejected out of hand. Our home (922 Homestead Ridge, on 9.886 acres) is approximately one-half mile East of the proposed 4" Forced Main Discharge Point of the facility as depicted in the application. We experience easterly winds throughout the year that would carry airborne pollutants from the discharge over our property. Persistent malodors as a nuisance can impair the value and enjoyment of any real estate, especially a home. This is one of several concerns. With the ongoing drought in our region and explosive development of Comal County, our small private well now produces no more than 110 gallons per day during the summer, and about half its original average during wet months. Most of my neighbors have experienced similar drops in production. We already severely ration our usage to compensate for this, and a subdivision with four homes per acre (1500 proposed) all on wells contiguous with ours will most probably lower the water table further rendering our well useless. The infrastructure to support high-density development necessarily produces significant impermeable ground cover, leading to increased runoff during rain events. The proposed facility is sited in a canyon next to the Edwards Contribution/Recharge demarcation. It will be subjected to intense "100 year" flooding that characterize our area and which we have experienced repeatedly in the last 20 years. These events flood West Fork Dry Comal Creek, and would subject the proposed development and properties downstream to raw sewage overflow. Sewage-laden floodwaters will fill the underpass at Highway 46 West adjacent to the planned subdivision, Cranes Mill Road and perhaps overflow its banks further upstream, in an elbow adjacent to Highway 46 downstream of the proposed sewer plant. This will contaminate livestock grazing in the affected areas. We and others found over a dozen omissions, misstatements, and factual errors on the TCEQ permit application. These include omission of affected Heritage Oaks subdivision's wells in the well map as well as our own well, and improper characterization of the plant's discharge route. Page 1 of South Texas Wastewater Treatment "Plans and Specifications For A Wastewater Treatment System Design" states: "...effluent is rechlorinated and pumped by duplex pumps through a 4" forced main to discharge point in Dry Comal Creek, a dry creek and eventually into Cibolo Creek which is also a dry creek." This is restated on page 2: "The treated effluent from this facility is then to be discharged into a dry creek, Dry Comal Creek, from thence into Cibolo Creek (also a dry creek) and then into the waters of the State of Texas--Segment 1908 of the San Antonio River." TCEQ's own Field Operations map disproves that. As the West Fork Dry Comal Creek (actual sight of the proposed sewer plant) traverses over 20 miles of the Edwards Recharge zone, it converges with Dry Comal Creek proper, continues through the Edward's Transition Zone and empties into Comal River in downtown New Braunfels. That's miles of cracks, fissures, caves, and porous rock communicating directly into the Edwards Aquifer and into which a flooded or malfunctioning sewer plant will discharge. It appears no hydrologist, geologist, TCEQ Field Operations maps or anyone charged with protecting the Edwards Recharge Zone, Comal County, its surface waters or wells was consulted in its preparation. This alone should be grounds for TCEQ to re-scrutinize the application. If that is not enough, on the same Page 2 its physical site location is described as being where two roads, Smithson Valley and FM 1863 intersect in Bulverde. That's almost ten miles away from its actual proposed location at 2959 S. Cranes Mill Road. "The first mile of dry discharge Lewis Creek is also within the property boundaries of this subdivision. The treatment plant is located approximately 6000 ft. north of the intersection of Smithson Valley Rd and FM 1863." Lewis Creek? Can't find it on TCEQ's topographical map or street Field Operations maps. This appears to be a cut-and-paste error from a different engineering description indicating their application to TCEQ was given the care and engineering standards inadequate to the gravity of the issue. It is our prayer that TCEQ will deny this application after close examination of the application's flaws and impacts. We look forward to attending a public hearing after close of public comments.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, October 09, 2015 1:33 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** 2959SCranesMillRd to 633 HR.pdf

H

**From:** klaubach@liftmasters.net [mailto:klaubach@liftmasters.net]  
**Sent:** Friday, October 09, 2015 12:58 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Kenneth C Laubach

**E-MAIL:** [klaubach@liftmasters.net](mailto:klaubach@liftmasters.net)

**COMPANY:**

**ADDRESS:** 633 HERBELIN RD  
NEW BRAUNFELS TX 78132-1837

**PHONE:** 2104154377

**FAX:**

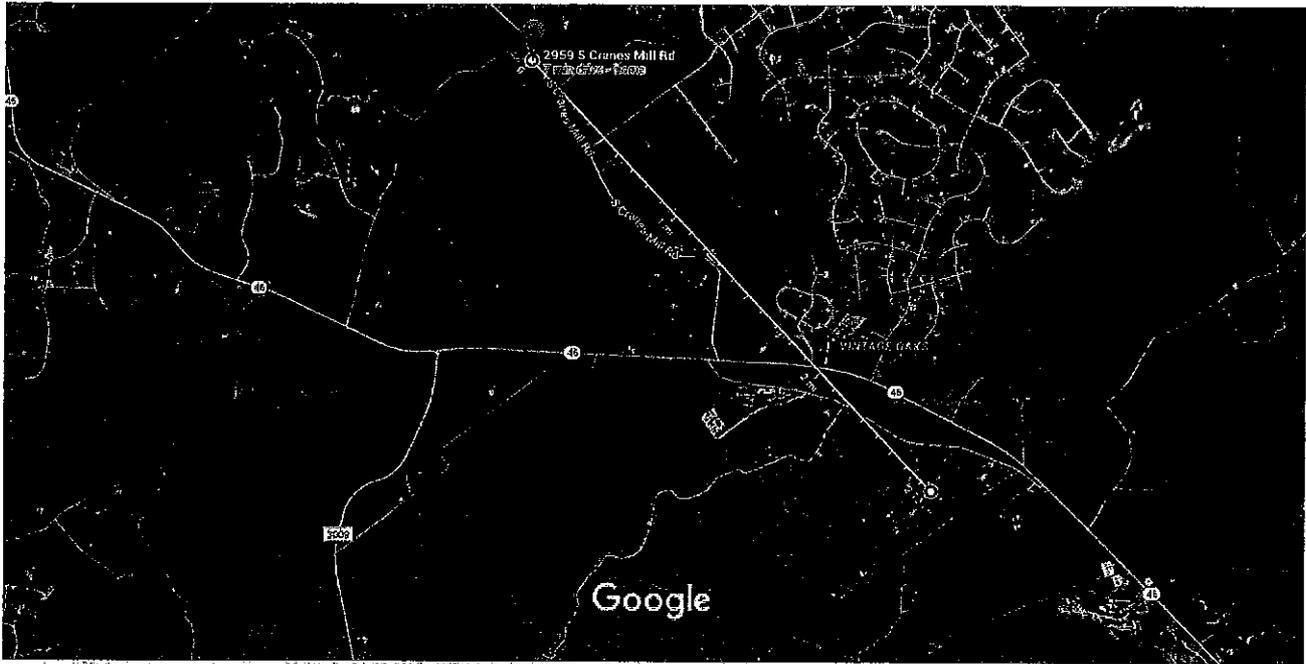
**COMMENTS:** Kenneth Laubach 633 Herbelin Rd New Braunfels , TX 78132 Tel (210) 415-4377  
[klaubach@liftmasters.net](mailto:klaubach@liftmasters.net) October, 9, 2015 To: Executive Director of the TCEQ Re: Randolph Todd Company, LLC Permit No WQ0015314001 I am a resident of Comal County and our well water is our only water supply. I am an affected party as our wells are within the 3 mile downstream parameter to be included in the assessment

*MWD*

reach. Address: 633 Herbelin Rd. & 639 Herbelin Rd., New Braunfels, 78132, approximately 2.76 miles from the Randolph Todd/ Meyer Ranch Development. (photo attached). We have two wells on our property, each approximately 1000 feet from the Dry Comal Creek where the sewage effluent will be flowing. My wells could become contaminated because we are located in the Edwards Aquifer recharge zone. I am hereby requesting a Contested Case Hearing for the permit to discharge wastes under the provisions of Section 402 of the Clean Water Act and Chapter 26 of the Texas Water Code. The reference TPDES permit Number is WQ0015314001 and EPA I.D. Number TX0135976. We live on a limestone area with many faults and caves which very easily and likely would allow for fouling of wells through impervious runoff into the Dry Comal Creek. The Dry Comal Creek is an intermittent stream, and is within 1000' feet of our wells; however, at times of flooding with heavy rains is a flowing creek which spreads an additional 15-30'. During the 1998 floods, so much water collected underground and spewed from under the ground like geysers. I am a resident of Comal County and our well water is our only water supply. I am an affected party as our wells are within the 3 mile downstream parameter to be included in the assessment reach. Address: 633 Herbelin Rd. & 639 Herbelin Rd. New Braunfels, 78132, approximately 2.76 miles from We have two wells on our property approximately each approximately 1000 feet from the Dry Comal Creek where the sewage effluent will be flowing. My wells could become contaminated because we are located in the Edwards Aquifer recharge zone. The development will increase impervious runoff. "Because of Comal County's particular geology and location, meteorologists know this area as the "flash flood capital of the world. As Comal County becomes more developed, the impervious cover, like paved areas and rooftops, increases, which causes increased run-off and actually changes the flood plain. The Dry Comal Creek is an intermittent creek, prone to flooding, it has no normal stream flow." Increases in impervious cover, like.... parking lots, roofs, roads and driveways, will prevent water from entering the soil, decrease recharge and increase runoff. In fact, as little as a 10 percent increase in impervious cover can increase runoff by 7 percent, according to a conservative model used by the Texas Department of Transportation and the Lower Colorado River Authority (1)." Permitting would allow up to .39 MGD into the Dry Comal Creek. By products of chlorinated water (trihalomethanes), and added bacteria loading will enter a fragile ecosystem and our water wells, our only water source for our drinking water, agriculture and livestock, and will affect the health and safety of my family. All treated effluent discharge should be prohibited according to TAC Rule 213.6 (1) New industrial and municipal wastewater discharges into or adjacent to water in the state that would create additional pollutant loading are prohibited on the recharge zone. This permit allows for the initial outflow into the contributory zone, a short distance where the effluent or treated effluent can affect the Recharge Zone, with possible contamination of groundwater. This permit will create additional pollutant loading. The minimal alternative allowed should be consideration should be a tertiary system as used by the city of Boerne. If pipes break, if pumps stop working, there will be inevitable discharge as impervious runoff down the Dry Comal Creek. With the dense limestone flat rock, multiple caves (Karst formations) and sink holes on the Meyer Ranch, over this recharge zone, and throughout our property, impervious runoff at the least and possible treated or untreated waste water will be flowing through this area emptying into the caves, and sinkholes and eventually into the Trinity and Glenrose Aquifers which we are dependent upon for our water. A cavern 90 feet under our property is documented on the Geo Cam study. Never should anything other than Class A drinking water be released in this area, otherwise the potential for 390,000 gallons of effluent per day into Dry Comal Creek, waste-water will contaminate the recharge zone, that which the residents of Comal County are dependent upon, and that which TCEQ is charged to protect. "In the northwestern half, the Glen Rose limestone layer of the Trinity Aquifer is exposed. Depending on the number of fractures or cracks, porosity and large recharge features like caves, springs and fissures, the water enters the limestone layer unfiltered, very different from what happens to sand aquifers. As a result, the two major underground aquifers that supply drinking water to the residents of Comal County are extremely vulnerable to pollution. The Texas Commission for Environmental Quality (TCEQ) has the authority to regulate water pollution abatement over the Edwards Aquifer Recharge Zone for commercial use." [http://www.cceo.org/flood/documents/FloodInsuranceStudy\\_Volume1of3.pdf](http://www.cceo.org/flood/documents/FloodInsuranceStudy_Volume1of3.pdf)" Regarding comments and responses to #20, #34, 35, based on concerns for eventual contamination of our water wells, our only water source: Since no environmental study or water flow studies in this cavern rich area are required for this permit and it is TCEQ's responsibility is to prevent water below the surface as well as on the surface from being contaminated, TCEQ, and the owners of the wastewater treatment plant will be held

responsible for contamination of our well waters. Our well waters are being analyzed by a TCEQ certified firm. Should there be any changes in water quality parameters, the pre and post documentation will be submitted to TCEQ, placing the burden on TCEQ and the developers for these changes as a result of treated or untreated effluent including trihalomethanes (chlorine residuals) or impervious runoff. Regarding comments and responses #36, there are already drinking water shortages documented by overuse of the Glenrose & Trinity Aquifer. See [http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA\\_Land\\_Use\\_Study\\_June\\_200511.pdf](http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA_Land_Use_Study_June_200511.pdf) Connections between ground water and surface water: states the ..” Boerne WWTP is built to tertiary standards and replenishes the Trinity Aquifer, which is already used beyond it’s capacity due to development. Boerne contributes a considerable amount of the base flow during drought periods. Fortunately for all of us in Comal County, the Boerne WWTP is built to “tertiary” standards, so it meets Environmental Protection Agency (EPA) standards for drinking water”. Based on this information, the wastewater permit as proposed should be denied and the permit if allowed should require minimally, tertiary standards to replenish water which is already being used beyond capacity prior to this proposed high density development. [http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA\\_Land\\_Use\\_Study\\_June\\_200511.pdf](http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA_Land_Use_Study_June_200511.pdf) Water 1. Landphair, H. C., McFalls, J. A., & Thompson, D. 2000. Design Methods, Selection, And Cost-effectiveness Of Stormwater Quality Structures, [tti.tamu.edu/](http://tti.tamu.edu/) (1) documents/1837-1.pdf. Respectfully submitted, Kenneth Laubach Land owner and resident, Comal County

# Google Maps 2959 S Cranes Mill Rd



Imagery ©2015 CAPCOG, DigitalGlobe, Landsat, Texas Orthoimagery Program, USDA Farm Service Agency, Map data ©2015 Google 2000 ft



2959 S Cranes Mill Rd  
Canyon Lake, TX 78132

Measure distance  
Total distance: 2.76 mi (4.45 km)

TCEQ Public Meeting Form  
June 18, 2015

#8

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Kenneth Laubach

Mailing Address: 633 Herbelia Rd New Braunfels, TX 78132

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

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

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

Email: KLaubach@LiftMasters.net ✓

Phone Number: 210-415-4377

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

If yes, which one? Friends of Dry Comal Creek

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

Ken Laubach

633 Herbelin Rd, New Braunfels TX 78132

What about protect the SALAMANDER  
IN the COMAL RIVER IN LAWDA

PARK NEW BRAUNFELS TEXAS.

What if the chemicals DESTROY  
IT AND OTHER MARINE LIFE

They ARE protected Now,

Also IN THE SAN MARCUS RIVER

Ken Laubach

RECEIVED

JUN 18 2015

AT PUBLIC MEETING

mm

**NO**

**SEWAUGH EFFLUENT**  
**IN THE DRY COMA**  
**CRICK**

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, March 09, 2015 8:25 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [klaubach@liftmasters.net](mailto:klaubach@liftmasters.net) [mailto:klaubach@liftmasters.net]  
**Sent:** Saturday, March 07, 2015 4:56 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
960516*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Kenneth C Laubach

**E-MAIL:** [klaubach@liftmasters.net](mailto:klaubach@liftmasters.net)

**COMPANY:**

**ADDRESS:** 633 HERBELIN RD  
NEW BRAUNFELS TX 78132-1837

**PHONE:** 2104154377

**FAX:**

**COMMENTS:** I want to request a public meeting to disapprove this application permit. The environmentally sensitive area should not have high density development creating effluent discharging into the bordering Edwards Aquifer Recharge Zone.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, October 09, 2015 12:54 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** 2959SCranesMillRd to 633 HR.pdf

H

**From:** v.laubach@gmail.com [mailto:v.laubach@gmail.com]  
**Sent:** Friday, October 09, 2015 12:27 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
WQ0015314001*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Victoria Beth Laubach

**E-MAIL:** [v.laubach@gmail.com](mailto:v.laubach@gmail.com)

**COMPANY:**

**ADDRESS:** 633 HERBELIN RD  
NEW BRAUNFELS TX 78132-1837

**PHONE:** 8304816532

**FAX:**

**COMMENTS:** Victoria Laubach 633 Herbelin Rd New Braunfels , TX 78132 Tel (830) 481-6532  
[v.laubach@gmail.com](mailto:v.laubach@gmail.com) October, 9, 2015 To: Executive Director of the TCEQ Re: Randolph Todd Company, LLC Permit No WQ0015314001 I am a resident of Comal County and our well water is our only water supply. I am an affected party as our wells are within the 3 mile downstream parameter to be included in the assessment

*MWD*

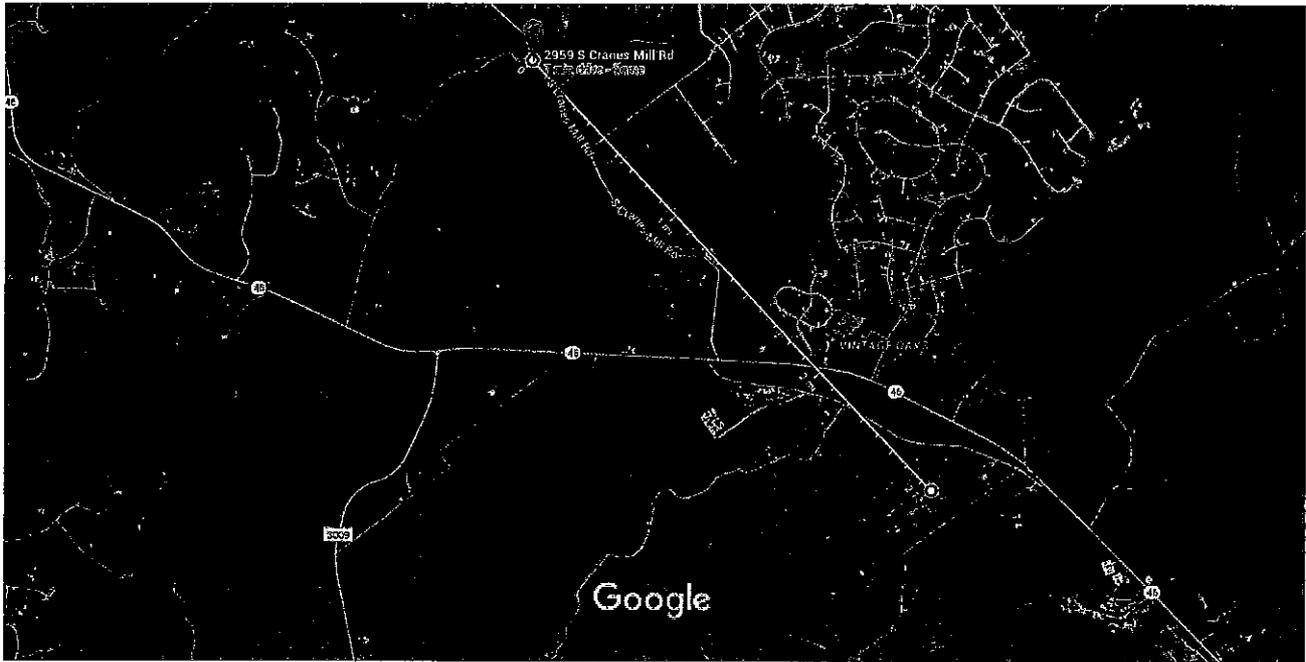
reach. Address: 633 Herbelin Rd. & 639 Herbelin Rd., New Braunfels, 78132, approximately 2.76 miles from the Randolph Todd/ Meyer Ranch Development (photo attached). We have two wells on our property, each approximately 1000 feet from the Dry Comal Creek where the sewage effluent will be flowing. My wells could become contaminated because we are located in the Edwards Aquifer recharge zone. I am hereby requesting a Contested Case Hearing for the permit to discharge wastes under the provisions of Section 402 of the Clean Water Act and Chapter 26 of the Texas Water Code. The reference TPDES permit Number is WQ0015314001 and EPA I.D. Number TX0135976. We live on a limestone area with many faults and caves which very easily and likely would allow for fouling of wells through impervious runoff into the Dry Comal Creek. The Dry Comal Creek is an intermittent stream, and is within 1000' feet of our wells; however, at times of flooding with heavy rains is a flowing creek which spreads an additional 15-30'. During the 1998 floods, so much water collected underground and spewed from under the ground like geysers. The Randolph Todd/ Meyer Ranch development will increase impervious runoff. "Because of Comal County's particular geology and location, meteorologists know this area as the "flash flood capital of the world. As Comal County becomes more developed, the impervious cover, like paved areas and rooftops, increases, which causes increased run-off and actually changes the flood plain. The Dry Comal Creek is an intermittent creek, prone to flooding, it has no normal stream flow." Increases in impervious cover, like... parking lots, roofs, roads and driveways, will prevent water from entering the soil, decrease recharge and increase runoff. In fact, as little as a 10 percent increase in impervious cover can increase runoff by 7 percent, according to a conservative model used by the Texas Department of Transportation and the Lower Colorado River Authority (1)." Permitting would allow up to .39 MGD into the Dry Comal Creek. By products of chlorinated water (trihalomethanes), and added bacteria loading will enter a fragile ecosystem and our water wells, our only water source for our drinking water, agriculture and livestock, and will affect the health and safety of my family. All treated effluent discharge should be prohibited according to TAC Rule 213. 6 (1) New industrial and municipal wastewater discharges into or adjacent to water in the state that would create additional pollutant loading are prohibited on the recharge zone. This permit allows for the initial outflow into the contributory zone, a short distance where the effluent or treated effluent can affect the Recharge Zone, with possible contamination of groundwater. This permit will create additional pollutant loading. The minimal alternative allowed should be consideration should be a tertiary system as used by the city of Boerne. If pipes break, if pumps stop working, there will be inevitable discharge as impervious runoff down the Dry Comal Creek. With the dense limestone flat rock, multiple caves (Karst formations) and sink holes on the Meyer Ranch, over this recharge zone, and throughout our property, impervious runoff at the least and possible treated or untreated waste water will be flowing through this area emptying into the caves, and sinkholes and eventually into the Trinity and Glenrose Aquifers which we are dependent upon for our water. A cavern 90 feet under our property is documented on the Geo Cam study. Never should anything other than Class A drinking water be released in this area, otherwise the potential for 390,000 gallons of effluent per day into Dry Comal Creek, waste-water will contaminate the recharge zone, that which the residents of Comal County are dependent upon, and that which TCEQ is charged to protect. "In the northwestern half, the Glen Rose limestone layer of the Trinity Aquifer is exposed. Depending on the number of fractures or cracks, porosity and large recharge features like caves, springs and fissures, the water enters the limestone layer unfiltered, very different from what happens to sand aquifers. As a result, the two major underground aquifers that supply drinking water to the residents of Comal County are extremely vulnerable to pollution. The Texas Commission for Environmental Quality (TCEQ) has the authority to regulate water pollution abatement over the Edwards Aquifer Recharge Zone for commercial use."

[http://www.cceo.org/flood/documents/FloodInsuranceStudy\\_Volume1of3.pdf](http://www.cceo.org/flood/documents/FloodInsuranceStudy_Volume1of3.pdf)" Regarding comments and responses to #20, #34, 35, based on concerns for eventual contamination of our water wells, our only water source: Since no environmental study or water flow studies in this cavern rich area are required for this permit and it is TCEQ's responsibility is to prevent water below the surface as well as on the surface from being contaminated, TCEQ, and the owners of the wastewater treatment plant will be held responsible for contamination of our well waters. Our well waters are being analyzed by a TCEQ certified firm. Should there be any changes in water quality parameters, the pre and post documentation will be submitted to TCEQ, placing the burden on TCEQ and the developers for these changes as a result of treated or untreated effluent including trihalomethanes (chlorine residuals) or impervious runoff. Regarding comments and responses #36, there are

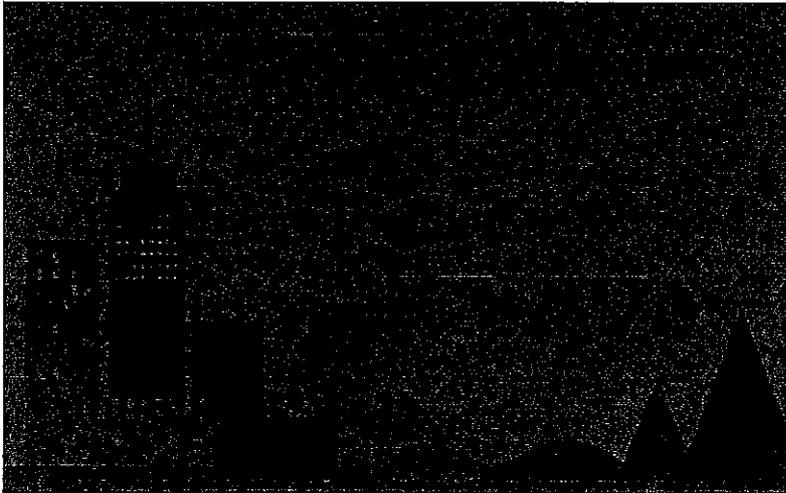
already drinking water shortages documented by overuse of the Glenrose & Trinity Aquifer. See [http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA Land Use Study June 200511.pdf](http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA_Land_Use_Study_June_200511.pdf) Connections between ground water and surface water: states the ..” Boerne WWTP is built to tertiary standards and replenishes the Trinity Aquifer, which is already used beyond it’s capacity due to development. Boerne contributes a considerable amount of the base flow during drought periods. Fortunately for all of us in Comal County, the Boerne WWTP is built to “tertiary” standards, so it meets Environmental Protection Agency (EPA) standards for drinking water”. Based on this information, the wastewater permit as proposed should be denied and the permit if allowed should require minimally, tertiary standards to replenish water which is already being used beyond capacity prior to this proposed high density development.

[http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA Land Use Study June 200511.pdf](http://www.aquiferalliance.net/Library/LibraryFiles/Resources/LWV-CA_Land_Use_Study_June_200511.pdf)  
Water 1. Landphair, H. C., McFalls, J. A., & Thompson, D. 2000. Design Methods, Selection, And Cost-effectiveness Of Stormwater Quality Structures, tti.tamu.edu/ (1) documents/1837-1.pdf. Respectfully submitted, Victoria Laubach Land owner and resident, Comal County

# Google Maps 2959 S Cranes Mill Rd



Imagery ©2015 CAPCOG, DigitalGlobe, Landsat, Texas Orthoimagery Program, USDA Farm Service Agency, Map data ©2015 Google 2000 ft



2959 S Cranes Mill Rd  
Canyon Lake, TX 78132

Measure distance  
Total distance: 2.76 mi (4.45 km)

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 04, 2015 10:12 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [v.laubach@gmail.com](mailto:v.laubach@gmail.com) [<mailto:v.laubach@gmail.com>]  
**Sent:** Wednesday, March 04, 2015 9:47 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/20/15*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Victoria Laubach

**E-MAIL:** [v.laubach@gmail.com](mailto:v.laubach@gmail.com)

**COMPANY:**

**ADDRESS:** 633 HERBELIN RD  
NEW BRAUNFELS TX 78132-1837

**PHONE:** 8304816532

**FAX:**

**COMMENTS:** This is a request for public hearing

*MWD*

#7

TCEQ Public Meeting Form  
June 18, 2015

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Victoria Laubach

Mailing Address: 633 Herbelin Rd New Braunfels

Physical Address (if different): Same

City/State: New Braunfels Zip: 78132

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

Email: v.laubach@gmail.com ✓

Phone Number: 830 481 6532

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

If yes, which one? Friends of Dry Comal Creek

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:** Monday, March 09, 2015 8:27 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

*MWD  
96056*

PM

**From:** [v.laubach@gmail.com](mailto:v.laubach@gmail.com) [mailto:[v.laubach@gmail.com](mailto:v.laubach@gmail.com)]  
**Sent:** Friday, March 06, 2015 4:58 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** Victoria Laubach

**E-MAIL:** [v.laubach@gmail.com](mailto:v.laubach@gmail.com)

**COMPANY:**

**ADDRESS:** 633 HERBELIN RD  
NEW BRAUNFELS TX 78132-1837

**PHONE:** 8304816532

**FAX:**

**COMMENTS:** I am requesting a public meeting regarding the South Cranes Mill permit. I have concerns for contamination of our well and availability of our drinking water with the proposed high density South Cranes Mill subdivision bordering the Edwards Aquifer Recharge zone. Dense populations create high water usage demands and lower the water table and availability of groundwater resources while increasing effluent waste being discharged into the neighboring Dry Comal Creek. This area of the hill country is full of caverns with

*MWD*

environmentally sensitive areas which will be affected by the drainage into recharge zones for the Edwards Aquifer. This area needs to be protected. This high density development has to be prevented. Chemicals used to treat waste water can jeopardize or contaminate these sensitive areas during flooding and increased runoff due to increased infrastructure of a high density development. Watersheds flow to the recharge zone and eventually into the aquifer posing a risk to our drinking water from the Trinity / Glen Rose and Edwards Aquifer, which ultimately affects the balance of aquatic life and aquatic recreation enjoyment when there is no water to enjoy. The power of the MUD's allows for further annexation for more high density development without proper management or consideration of our natural resources which can be depleted with the developers making financial gains at the expense of landowners depleted resources. Without clean quality water the legacy of the Texas hill country will be written in history as what was and lost due to improper management allowing a few to prosper. Drinking water shortages have been predicted since the mid 1960's. It's time to act to preserve our resource of clean drinking water.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 03, 2015 11:05 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** 2013 CCR2.pdf

*mwd  
96056*

**From:** v.laubach@gmail.com [mailto:v.laubach@gmail.com]  
**Sent:** Tuesday, February 03, 2015 8:08 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Victoria B Laubach

**E-MAIL:** [v.laubach@gmail.com](mailto:v.laubach@gmail.com)

**COMPANY:**

**ADDRESS:** 633 HERBELIN RD  
NEW BRAUNFELS TX 78132-1837

**PHONE:** 8304816532

**FAX:**

**COMMENTS:** My name is Victoria Laubach, and my family members are residents of Comal County. I would like to have the TCEQ committee responsible for the future and well being of the water resources of the Edwards Aquifer place a stop to the proposal for this 1500 home development on this small parcel of land which would set a precedent for other similar developments over this precious resource, which when damaged

*mwd*

would be irreversible. Let common sense prevail. Ed Harris, local resident, obtained a copy of the permit application, and found the permit application filed by Randolph Todd Company LLC of Austin for a domestic wastewater treatment facility at 2959 South Cranes Mill Road to have at least 15 errors in it, including misidentifying the route of Dry Comal Creek, saying it flows to Cibolo Creek on the Comal/Bexar county border, rather than noting its true course into New Braunfels near the Wurstfest grounds and then into the Comal and Guadalupe rivers, and that it leaves out information about the environmental impact of the sewer plant on the creek, on wildlife and on downstream residents. Concerns are, if the engineers who put this permit application together have made these errors, the rest of the permit may have additional flaws. We live on Herbelin Rd where the Dry Comal Springs crosses in 2 areas. We feel we will be adversely affected by the proposed water treatment facility proposed to be located off Highway 46 on South Cranes Mill Road just west of the Vintage Oaks Subdivision, not only because of the discharge into the Dry Comal Springs but additionally with the discharge of the chemicals used to reclaim waste water into the discharge zone of the Edwards Aquifer. The plant for the proposed 1500 homes on this 735 acre development would potentially discharge a daily average of 390,000 gallons of treated effluent into the Dry Comal Creek. The Dry Comal Creek runs only when there is a significant amount of rain, and that rain goes into the caverns and Edwards Aquifer discharge zone over the Edwards Aquifer. We are dependent upon our well water, which is pristine. Our water is one of the primary reasons we chose to live in Comal County vs. downriver from water treatment plants in Guadalupe County. For 6 years we physically carried our drinking water from our well to our house in Guadalupe County to have pristine drinking water. Our drinking water was one of the biggest determiners of our decision to reside on Herbelin Rd, vs. downstream from the New Braunfels water treatment plants along the Guadalupe River. The water reports we received from the Springhill Water indicated precautionary statements the water was not recommended for infants, fragile individuals. This report is attached, and is but one piece of evidence reclaimed water is not safe for all, and that there are residue chemicals which remain in the water, partially due to the chemical process of treating or reclaiming the water supposedly to make it safe for consumption. We transported 10-15 gallons of drinking water weekly for consumption, when the above mentioned water source isn't trustworthy. We have now relocated where the water is drinkable, and now are presented with this current threat to our good drinking water. How can our officials who we trust to care for our resources even entertain the idea of such a permit? We do protest the high possibility of our wells and the resources feeding the Edwards Aquifer Discharge zone being contaminated by this reclaimed waste water. There are several branches of the Dry Comal Creek. The west branch of the creek starts at the northern end of South Cranes Mill Road on the Myer Ranch and makes its way through the Texas Hill Country until it reaches New Braunfels, Texas and enters the Comal River at WurstFest Hall. The Dry Comal Creek is above numerous caves, rock beds and limestone formations which comprise its boundaries and then flows through the Edwards Aquifer Recharge Zone. The 1500 home subdivision would also place undue burden and hazardous driving for the two-lane South Cranes Mill Road by the trucks that would run daily to remove the sewer sludge collected from the plant, The name for the creek, beginning with the word "Dry" indicates that it is dry, unless there is a significant amount of rainfall, and then it can become torrentially "river-like". The approval of this permit will open the door for even more development over the ecologically sensitive areas in Comal county by developers wishing to make tracts of hill country land smaller and smaller. Our natural filtering systems and water resources cannot support this development. If this development wants to use such technology to develop a community of this size on such a disproportionately small amount of land, they should go to an area where such technology is already in place, and not be allowed to impose on this natural resource of water which the residents of this area are dependent upon leaving behind contaminates that could potentially/ eventually work through the natural filtering systems into New Braunfels and its natural resources of of the Comal Springs, the Comal River. The long term effect will not be known until the damage is done, perhaps irreversible. Why consider such a move of shooting ourselves in the foot and then look back and say, why was this allowed to happen? Look around at neighboring counties and the water crises they have experienced. Do our state and local officials really condone this kind of irreversible damage to our ecological system in the name of wealthy pockets? Our Comal County elected officials and government offices need to participate in stopping these developments and stand by statutes which protect the aquifers, creek beds, and citizens. To restate my concern, I would like to have this committee consider the future and well being of the water resources of the Edwards

Aquifer by denying this proposal for this 1500 home development on this small parcel of land which would set a precedent for other similar developments over this precious resource, which when damaged would be irreversible. Please do not let us all be sorry in the long term for decisions made by a few which will have such long term effects. Thanking you for your support of your citizens of Comal County, the City of New Braunfels, and the state of Texas, rather than the developers whose goal is to have deeper pockets.

# CONSUMER CONFIDENCE REPORT

## TCEQ CERTIFICATION of DELIVERY

*For Calendar year 2013*

**Public Water System(PWS) Name :** SPRINGS HILL WSC

**PWS ID Number :** TX0940022

I certify that the community water system named above has distributed the Consumer Confidence Report (CCR) for the calendar year of 2013 and that the information in the report is correct and consistent with the compliance monitoring data previously submitted to the TCEQ. Public Water Systems serving 500 or fewer persons are not required to mail the entire CCR to their customers as long as the system provides notice at least once per year by July 1 to its customers by mail, door-to-door delivery, or by posting in an appropriate location that the report is available upon request.

Date of Delivery: 6/6/14  
 Certified By: Name (print): Atilano Agüero  
 Title: Assistant General Manager  
 Phone Number: (830) 319-7683 Email: AAguero@springshill.org  
 Signature: *Atilano Agüero* Date: 6/6/14

**Direct delivery methods-You must use at least one direct delivery method (check all that apply):**

- Mail a paper copy of the CCR
- Electronic Delivery:**
  - Mail notification that CCR is available on-line at <http://www.springshill.org>
  - Email direct web address of the CCR, available at [http://\\_\\_\\_\\_\\_](http://_____)
  - Email CCR as an attachment to an email.
  - Email CCR as an embedded image in an email.
  - Other direct delivery (for example, door hangers or additional electronic delivery method).

Please specify: \_\_\_\_\_

**Good-faith delivery methods -To reach people who do not receive bills (check all that apply):**

- Posting the CCR on the Internet at [http://\\_\\_\\_\\_\\_](http://_____)
- Mailing the CCR to people who receive mail, but who do not receive bills.
- Advertising the availability of the CCR in news media.
- Posting the CCR in public places.
- Delivering multiple copies to single billing addresses serving multiple persons.
- Delivering multiple copies of the CCR to community organizations.

\*Systems serving 100,000 or more people are required to post the CCR on a publicly available web site and provide the URL here: [http://\\_\\_\\_\\_\\_](http://_____)

All systems are required to mail by July 1 the certification of delivery and complete Consumer Confidence Report to: TCEQ recommends the use of certified mail.

Sending by certified mail:	Sending by regular mail:
TCEQ PDW, MC-155, Attn: CCR, 12100 Park 35 Circle Austin, TX 78753	TCEQ PDW, MC-155, Attn: CCR, PO Box 13087 Austin, TX 78711-3087

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## IMPORTANT INFORMATION

(This report must be printed in Landscape Orientation to prevent cutting off of text.)

The purpose of this document is to provide most of the data that you will use for your annual Consumer Confidence Report (CCR) for your water system. The report below is not your Consumer Confidence Report. In order to meet all of the requirements of Title 30, Texas Administrative Code (30 TAC), Chapter 290, Subchapter H Consumer Confidence Reports, you must follow the instructions below and review 30 TAC 290.272 Content of the Report to ensure your CCR contains all required information.

To download the data into your word processing program, follow these steps. Remember you must have the document set up in Landscape Orientation.

- \* Choose Edit from the Menu.
- \* Choose Select All from the edit drop down MENU. (It will highlight all the information)
- \* Choose Edit from the Menu, select Copy from the edit drop down Menu.
- \* Open your word processing program.
- \* Choose Edit from the MENU, select Paste from the edit dropdown MENU and the information will transfer.
- \* You are required to review the data generated in this report to ensure that it is correct and consistent with the compliance monitoring data previously submitted to TCEQ.
- \* You must deliver the CCR to your customers by July 1 of every year.
- \* All water systems must fill out the Certification of Delivery and mail the original Certification of Delivery and the Consumer Confidence Report to TCEQ by July 1:  
If sending by regular mail - TCEQ, PDWS MC-155 Attn CCR, PO BOX 13087, Austin, TX 78711-3087  
If sending by certified mail - TCEQ, PDWS MC-155 Attn CCR, 12100 Park 35 Circle, Austin, TX 78753
- \* Systems with 500 customers or fewer are not required to direct deliver the CCR to customers. Instead they must provide notice by July 1 to customers by mail, door-to-door delivery, or posting in an appropriate location that the report is available upon request.
- \* The report must include the telephone number of the owner, operator, or designee of the community water system as a source of additional information concerning the report.
- \* In communities with a large proportion of non-English speaking residents, as determined by TCEQ, the report must contain information in the appropriate language(s) regarding the importance of the report or contains a telephone number or address where such residents may contact the system to obtain a translated copy of the report and/or assistance in the appropriate language.
- \* The report must include information about opportunities for public participation in decisions that may affect the quality of the water (e.g., time and place of

regularly scheduled board meetings).

• Water systems must look up the current Source Water Assessment status in DWV by clicking on "Source Water Assessment Results" from the Water System Detail page and add one of the following four paragraphs into the CCR. Where the text [insert name of person to contact] is displayed, you must replace it with contact information from your water system.

i. If at least one contaminant listed as highly susceptible, use this text:

The TCEQ completed an assessment of your source water and results indicate that some of your sources are susceptible to certain contaminants. The sampling requirements for your water system are based on this susceptibility and previous sample data. Any detection of these contaminants may be found in this Consumer Confidence Report. For more information on source water assessments and protection efforts at our system, contact [insert name of person to contact]

ii. If no contaminants listed as highly susceptible, use this text:

The TCEQ completed an assessment of your source water and results indicate that our sources have a low susceptibility to contaminants. The sampling requirements for your water system are based on this susceptibility and previous sample data. Any detections of these contaminants may be found in this Consumer Confidence Report. For more information on source water assessments and protection efforts at our system, contact [insert name of person to contact]

iii. If there are no source water assessment results available for the system, use this text:

A Source Water Assessment for your drinking water source(s) is currently being conducted by the TCEQ and should be provided to us this year. The report will describe the susceptibility and types of constituents that may come into contact with your drinking water source based on human activities and natural conditions. The information in this assessment will allow us to focus our source water protection strategies.

iv. If only sources of water are purchased, use this text:

The TCEQ has completed a Source Water Assessment for all drinking water systems that own their sources. The report describes the susceptibility and types of constituents that may come into contact with your drinking water source based on human activities and natural conditions. The system(s) from which we purchase our water received the assessment report. For more information on source water assessments and protection efforts at our system, contact [insert name of person to contact]

\* If your water system is operating under a variance or exemption from the Safe Drinking Water Act granted under Section 290.102(b)(4) of Title 30 of the Texas Administrative Code, you must include the following:

1. Explanation of the variance or exemption;
  2. Date the variance or exemption was issued expires;
  3. Brief explanation about the steps the system is taking to comply with the term and schedules of the variance or exemption; and
  4. Notice of any opportunity for public input on the review or renewal of the variance or exemption.
- You must include any commonly used name and location of the body (ies) of water where your system obtains its water. You can include this on the Source Water Information page on the space under Location.

- \* If your water system receives water from a source that is not your own, you are required to include the current CCR year's Regulated Contaminants Detected table. The providing system is required to give you this information by April 1 of every year. This data should include things like SOC, MIN, MTL, VOC, 1052, 504, 515, 531. Because you cannot test these sources of water the providing system is required to give them to you. Systems that use an interconnect or emergency source to augment the drinking water supply during the calendar year must also include the source of water, length of time used, explanation why it was used, and whom to call for water quality information.
- \* If your water system had any violations during the current CCR Calendar year, you are required to include an explanation of the corrective action take by the water system.
- \* If your water system is going to use the CCR to deliver a Public Notification, you must include the full public notice and return a copy of the CCR and Public Notice with the Public Notice Certification Form. This is in addition to the copy and certification form required by the CCR Rule.
- \* The information about likely sources of contamination provided in the CCR is generic. Specific information regarding contaminants may be available in sanitary surveys and source water assessments and should be used when available to the system.
- \* If a community water system distributes water to its customers from multiple hydraulically independent distribution systems fed by different raw water sources, the table should contain a separate column for each service area, and the report should identify each separate distribution system. Alternatively, systems may produce separate reports tailored to include data for each service area.
- \* If a water system has performed any monitoring for Cryptosporidium, the report must include: (1) A summary of the results of any detections; and (2) An explanation of the significance of the results.
- \* For detected unregulated contaminants for which monitoring is required the table(s) must contain the average and range of concentrations at which the contaminant was detected. The CCR only needs to include detections that were found during the year the report covers. If there are detections the report must include the following explanation: "Unregulated contaminants are those for which the EPA has not established drinking water standards. The purpose of unregulated contaminant monitoring is to assist EPA in determining the occurrence of unregulated contaminants in drinking water and whether future regulations are warranted."
- \* If you used chlorine, chloramines, chlorine dioxide or ozone in your water system you must include: (1) The chemical used, (2) Average level of quarterly data, (3) lowest result of a single sample, (4) Highest result of a single sample, (5) Maximum residual disinfectant level (MRDL), (6) Maximum residual disinfectant level goal (MRDLG), (7) The unit of measure and (8) Source of the chemical.
- \* If a water system has performed any monitoring for radon in the finished water, the report must include: (1) The results of the monitoring; and (2) An explanation of the significance of the results.
- \* If a water system has performed additional monitoring which indicates the presence of other contaminants in the finished water, TCEQ strongly encourages systems to report any results which may indicate a health concern. To determine if results may indicate a health concern, TCEQ recommends that systems find out if EPA has proposed a National Primary Drinking Water Regulation or issued a health advisory for that contaminant by calling the Safe Drinking Water Hotline (800-426-4791). TCEQ considers detects above a proposed MCL or health advisory level to indicate possible health concerns. For such contaminants, TCEQ recommends that the report include: (1) The results of the monitoring; and (2) an explanation of the significance of the results noting the existence of a health advisory or a proposed regulation.
- \* If your system received a fecal-indicator positive ground water source sample, you must inform your customers by including the following information in the CCR:

1. The source of fecal contamination (if the source is known) and the dates of the fecal indicator-positive;

2. Actions taken to address the fecal contamination in the groundwater source;

3. For each fecal contamination that has not been addressed the plan approved by TCEQ and schedule for correction; and

4. The potential health affects using language in sec290.275 (3)

\* If you are a groundwater system that receives notice from a state of a significant deficiency, you must inform your customers in your CCR report of any significant deficiencies that are not corrected by December 31 of the year covered by it. The CCR must include the following information:

1. The nature of the significant deficiency and the date it was identified by the state.

2. Include information regarding the State-approved plan and schedule for correction, including interim measures, progress to date, and any interim measures completed.

3. If the significant deficiency was corrected by the end of the calendar year, include information regarding how the deficiency was corrected and the date it was corrected.

## Annual Drinking Water Quality Report

TXQ940022

SPRINGS HILL WSC

Annual Water Quality Report for the period of January 1 to December 31, 2013

This report is intended to provide you with important information about your drinking water and the efforts made by the water system to provide safe drinking water.

For more information regarding this report contact:

Name: Atilano Aguero

Phone: 830-379-7683

Este reporte incluye información importante sobre el agua para tomar. Para asistencia en español, favor de llamar al teléfono 830-379-7683

SPRINGS HILL WSC is Surface Water

### Sources of Drinking Water

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPA's Safe Drinking Water Hotline at (800) 426-4791.

Contaminants that may be present in source water include:

- Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.
- Inorganic contaminants, such as salts and metals, which can be naturally-occurring or result from urban storm water runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.
- Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban storm water runoff, and residential uses.
- Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban storm water runoff, and septic systems.

- Radioactive contaminants, which can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, EPA prescribes regulations which limit the amount of certain contaminants in water provided by public water systems. FDA regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

Contaminants may be found in drinking water that may cause taste, color, or odor problems. These types of problems are not necessarily causes for health concerns. For more information on taste, odor, or color of drinking water, please contact the system's business office.

You may be more vulnerable than the general population to certain microbial contaminants, such as *Cryptosporidium*, in drinking water. Infants, some elderly, or immunocompromised persons such as those undergoing chemotherapy for cancer; persons who have undergone organ transplants; those who are undergoing treatment with steroids; and people with HIV/AIDS or other immune system disorders, can be particularly at risk from infections. You should seek advice about drinking water from your physician or health care providers. Additional guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* are available from the Safe Drinking Water Hotline (800-426-4791).

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. We are responsible for providing high quality drinking water, but we cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <http://www.epa.gov/safewater/lead>.

### Information about Source Water Assessments

A Source Water Susceptibility Assessment for your drinking water source(s) is currently being updated by the Texas Commission on Environmental Quality. This information describes the susceptibility and types of constituents that may come into contact with your drinking water source based on human activities and natural conditions. The information contained in the assessment allows us to focus source water protection strategies.

For more information about your sources of water, please refer to the Source Water Assessment Viewer available at the following URL: <http://gis.tceq.state.tx.us/swav/Controller/index.jsp?wtrsrc>

Further details about sources and source-water assessments are available in Drinking Water Watch at the following URL: <http://dww.tceq.texas.gov/DWW>

Source Water Name		Type of Water	Report Status	Location
1 - MESA TRAILS	MESA TRAILS	GW	Active	Cortizo Wilcox Aquifer
1-3 LAKE PLACID SWTP		SW	Active	Guadalupe River
2 - MESA TRAILS	MESA TRAILS	GW	Active	Cortizo Wilcox Aquifer
3 - MESA TRAILS	MESA TRAILS	GW	Active	Cortizo Wilcox Aquifer
SHERTZ - SEGUIN 0.500 MGD	CC FROM TX0940094 SCHERTZ	GW	Active	Cortizo Wilcox Aquifer
SW FROM CRWA LAKE DUNLAP WTP	CC FROM TX0940091 CANYON	SW	Active	Guadalupe River
TREATED GW UC WITH CRWA WELLS		GW	Active	Cortizo Wilcox

2013 Regulated Contaminants Detected

Lead and Copper

Definitions:  
 Action Level Goal (ALG): The level of a contaminant in drinking water below which there is no known or expected risk to health. ALGs allow for a margin of safety.  
 Action Level: The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.

Lead and Copper	Date Sampled	MCLG	Action Level (AL)	90th Percentile	# Sites Over AL	Units	Violation	Likely Source of Contamination
Copper	2013	1.3	1.3	0.239	0	ppm	N	Erosion of natural deposits; Leaching from wood preservatives; Corrosion of household plumbing systems.
Lead	2013	0	15	3.38	1	ppb	N	Corrosion of household plumbing systems; Erosion of natural deposits.

Water Quality Test Results

Definitions:  
 Avg: The following tables contain scientific terms and measures, some of which may require explanation.  
 Maximum Contaminant Level or MCL: Regulatory compliance with some MCLs are based on running annual average of monthly samples.  
 Maximum Contaminant Level Goal or MCLG: The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.  
 Maximum residual disinfectant level or MRDL: The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.  
 Maximum residual disinfectant level goal or MRDLG: The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.  
 MFL: The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.  
 na: million fibers per liter (a measure of asbestos)  
 NTU: not applicable.  
 pCi/L: nephelometric turbidity units (a measure of turbidity)  
 pCi/L: picocuries per liter (a measure of radioactivity)

**Water Quality Test Results**

ppb:	micrograms per liter or parts per billion - or one ounce in 7,350,000 gallons of water.
ppm:	milligrams per liter or parts per million - or one ounce in 7,350 gallons of water.
ppt	parts per trillion, or nanograms per liter (ng/L)
ppq	parts per quadrillion, or picograms per liter (pg/L)

**Regulated Contaminants**

Disinfectants and Disinfection By-Products	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Haloacetic Acids (HAAS)*	2013	20	0 - 47.3	No goal for the total	60	ppb	N	By-product of drinking water disinfection.
Total Trihalomethanes (TTHM)	2013	43	1.2 - 96.9	No goal for the total	80	ppb	Y	By-product of drinking water disinfection.
Inorganic Contaminants	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Barium	2013	0.0455	0.0455 - 0.0455	2	2	ppm	N	Discharge of drilling wastes; Discharge from metal refineries; Erosion of natural deposits.
Fluoride	2013	0.2	0.2 - 0.2	4	4.0	ppm	N	Erosion of natural deposits; Water additive which promotes strong teeth; Discharge from fertilizer and aluminum factories.
Nitrate (measured as Nitrogen)	2013	2	0 - 1.5	10	10	ppm	N	Runoff from fertilizer use; Leaching from septic tanks, sewage; Erosion of natural deposits.
Radioactive Contaminants	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Beta/gamma emitters	08/01/2012	9.9	0 - 9.9	0	50	pCi/L*	N	Decay of natural and man-made deposits.
Combined Radium 226/228	05/03/2011	3.5	3.5 - 3.5	0	5	pCi/L	N	Erosion of natural deposits.
Volatile Organic Contaminants	Collection Date	Highest Level Detected	Range of Levels Detected	MCLG	MCL	Units	Violation	Likely Source of Contamination
Nylons	2013	0.0007	0.0007 - 0.0007	10	10	ppm	N	Discharge from petroleum factories; Discharge from chemical factories.

\*EPA considers 50 pCi/L to be the level of concern for beta particles.

**Turbidity**

	Limit (Treatment Technology)	Level Detected	Violation	Likely Source of Contamination
Highest single measurement	1 NTU	0.53 NTU	N	Soil runoff.
Lowest monthly % meeting limit	0.3 NTU	95%	N	Soil runoff.

Information Statement: Turbidity is a measurement of the cloudiness of the water caused by suspended particles. We monitor it because it is a good indicator of water quality and the effectiveness of our filtration

2013

**Maximum Chlorine Residual Level.**

AVG	MIN	MAX	MRDL/MRDLG
2.04	1.30	3.70	4.0

Unit of measure

Source of chemical

PPM/MGL

Disinfectant used to control Microbes

**Violations Table**

<b>Lead and Copper Rule</b>			
The Lead and Copper Rule protects public health by minimizing lead and copper levels in drinking water, primarily by reducing water corrosivity. Lead and copper enter drinking water mainly from corrosion of lead and copper containing plumbing materials.			
Violation Type	Violation Begin	Violation End	Violation Explanation
LEAD CONSUMER NOTICE (LCR)	12/30/2013	2013	We failed to provide the results of lead tap water monitoring to the consumers at the location water was tested. These were supposed to be provided no later

<b>Total Trihalomethanes (TTHM)</b>			
Some people who drink water containing trihalomethanes in excess of the MCL over many years may experience problems with their liver, kidneys, or central nervous systems, and may have an increased risk of getting cancer.			
Violation Type	Violation Begin	Violation End	Violation Explanation
MCL, LRAA	01/01/2013	03/31/2013	Water samples showed that the amount of this contaminant in our drinking water was above its standard (called a maximum contaminant level and abbreviated

3 repeat Bacteriological samples were taken immediately as required by Texas Commission on Environmental Quality. A sample was taken at the site, Another sample taken up stream and 1 downstream with all returning from Guadalupe Blanco River Authority with Negative results.

Mandatory Language for a Maximum Contaminant Level Violation

MCL, LRAA/ TTHM

RECEIVED

JUN 18 2015

AT PUBLIC MEETING

The Texas Commission on Environmental Quality (TCEQ) has notified the SPRINGS HEADWATER TREATMENT PLANT (0940022) that the drinking water being supplied to customers had exceeded the Maximum Contaminant Level (MCL) for total trihalomethanes. The U.S. Environmental Protection Agency (U.S. EPA) has established the MCL for total trihalomethanes to be 0.080 milligrams per liter (mg/L) based on locational running average (LRAA), and has determined that it is a health concern at levels above the MCL. Analysis of drinking water in your community for total trihalomethanes indicates a compliance value in quarter one 2015 of 0.088 mg/L for DBP2-04.

Trihalomethanes are a group of volatile organic compounds that are formed when chlorine, added to the water during the treatment process for disinfection, reacts with naturally-occurring organic matter in the water.

Some people who drink water containing trihalomethanes in excess of the MCL over many years may experience problems in their liver, kidney, or central nervous systems, and may have increased risk of getting cancer.

You do not need to use an alternative water supply. However, if you have health concerns, you may want to talk to your doctor to get more information about how this may affect you.

We are taking the following actions to address this issue: We are researching the use of ozone to enhance purification and to prevent future higher levels of Trihalomethanes.

Please share this information with all people who drink this water, especially those who may not have received this notice directly (i.e. people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

If you have questions regarding this matter, you may contact Atilano Aguero or Devan Herrera at 830-379-7683.

\*\*\*This notice was mailed to our residence in Seguin, and received by email April 13, 2015

Kenneth & Victoria Laubach

633 Herbelin Rd New Braunfels, TX 78132

MW

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 04, 2015 8:43 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [mmmrun81@gmail.com](mailto:mmmrun81@gmail.com) [<mailto:mmmrun81@gmail.com>]  
**Sent:** Tuesday, February 03, 2015 9:57 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Marjorie Marks

**E-MAIL:** [mmmrun81@gmail.com](mailto:mmmrun81@gmail.com)

**COMPANY:**

**ADDRESS:** 1355 RANCH PKWY #112  
NEW BRAUNFELS TX 78130-3987

**PHONE:** 7133207365

**FAX:**

**COMMENTS:** My husband and I are building a home in the Vintage Oaks subdivision which is adjacent to the site for this wastewater treatment plant. We have concerns about this plant and the affect it will have on Dry Comal Creek, nearby land, and the Edwards Aquifer. We respectfully request a public hearing by the TCEQ before action is taken on this permit. Marjorie Marks

*MW*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, October 09, 2015 11:36 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** emartin@gvvc.com [mailto:emartin@gvvc.com]  
**Sent:** Friday, October 09, 2015 10:31 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwp  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME: MRS Elizabeth Martin**

**E-MAIL: [emartin@gvvc.com](mailto:emartin@gvvc.com)**

**COMPANY:**

**ADDRESS: 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667**

**PHONE: 8302284448**

**FAX:**

**COMMENTS:** I am a resident of Comal County and am dependent on well water as our only water supply. We are in the Edwards Aquifer Recharge Zone, and live on a limestone area with many faults and caves which very easily and likely would allow for fouling of wells through sewage effluent through impervious runoff into the Dry Comal Creek with its perennial flooding. I am requesting a Contested Hearing for the permit to discharge wastes under the provisions of Section 402 of the Clean Water Act and Chapter 26 of the Texas Water Code.

*MW*

The reference TPDES permit Number is WQ0015314001 and EPA I.D. Number TX0135976. The Dry Comal Creek has no normal stream flow, permitting would allow 43-9 gallon tankers to dump into the Dry Comal Creek every 33 minutes every 24 hours. This will negatively affect the Edwards Aquifer Recharge Zone, chlorinating water into a fragile ecosystem, by products of chlorinated water into water wells for our drinking water and agriculture and livestock. The initial outflow is into the contributory zone, with only a short distance where the effluent or treated effluent can affect the Recharge Zone, with possible contamination of groundwater based. All treated effluent discharge should be prohibited according to TAC Rule 213. 6 (1) New industrial and municipal wastewater discharges into or adjacent to water in the state that would create additional pollutant loading are prohibited on the recharge zone. This permit will create additional pollutant loading. I have major concerns with the integrity of the planning of this wastewater treatment plant permit, as the original application containing numerous mistakes in descriptions of water body, terrain, flow path, and latitude error, posing doubts as to the future maintenance of plant, questioning the integrity of developer and the engineer who signed off on a direct discharge permit over the Edwards Recharge Zone to permit wastewater piped approximately three miles across the recharge zone into the contributing zone to be discharged into the headwaters of the Dry Comal Creek. If pipes break, if pumps stop working, what is to prevent discharge as impervious runoff and down the Dry Comal Creek with perennial flooding. Dense limestone flat rock, multiple caves (Karst formations) and sink holes line this recharge zone on the Meyer Ranch and throughout our property. Waste water will be flowing through this area emptying into the caves, and sinkholes and eventually into the Glenrose and Edwards Aquifers which is where I have a well for home use and livestock use. Contamination (ecoli and others) is a major concern for myself and others along the Dry Comal Creek. During high rain and flooding times leaching will occur because of the multiple perennial ponds along the creek bed. The water will collect in these areas for weeks, months and remain constant yearly. During the drilling of my water well it was discovered there is a cavern 90 feet under my property is documented on my well report filed with TCEQ. Texas Parks and Wildlife as well registered concerns with TCEQ on record Jun 18, 2015, stating errors with the permit application. The effluent should not be allowed whatsoever over the recharge zone or near water wells. Never should anything other than Class A drinking water be released in this area. I believe it is a subterfuge for the developers to draw up a plan to pump the effluent from the recharge zone up a few thousand feet and release it on the contributory zone in order to mask that will potentially occur: 390,000 gallons of effluent per day into Dry Comal Creek, waste-water contaminating the recharge zone. To members of TCEQ who are not aware, Comal County Commissioners ruled against the owners of Frankie Meyer Ranch petitioning for a WCID for the Randolph Todd development, stating the petition didn't satisfy the criteria for this developments' demand for sustainable water. The county has no control over wastewater and TCEQ isn't concerned with sustainable water supply, so it is the "consumer" who bears the consequence of TCEQ's waste water permitting of controlled waste water contaminating the ground water. The Texas bureaucracy is not protecting the water which we, and, residents downstream are dependent upon. If this permit is not denied, our water source will be downstream of where the treated sewage water will exit the proposed Meyer Ranch/ Todd Randolph Development Waste Water Treatment Facility to service an unnecessary 1,500 homes on less than 700 acres over the precious water supply serving. Based on concerns for eventual contamination of our water wells, our only water source, this permit should not be granted. Since no environmental study or water flow studies in this cavern rich area is required for this permit and it is TCEQ's responsibility is to prevent water below the surface as well as on the surface from being contaminated, TCEQ, and the owners of the wastewater treatment plant will be held responsible for contamination of our well water. A full baseline study of this well water will be submitted to TCEQ, as well as for the previous existing well, documentation which puts the burden on TCEQ and its Mission Statement and the Agency Philosophy, and what tax dollars pay this state agency to enforce.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, July 07, 2015 10:17 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-WQ; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [emartin@gvvc.com](mailto:emartin@gvvc.com) [mailto:[emartin@gvvc.com](mailto:emartin@gvvc.com)]  
**Sent:** Monday, July 06, 2015 9:47 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

MWD  
94056

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Elizabeth Martin

**E-MAIL:** [emartin@gvvc.com](mailto:emartin@gvvc.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** I would like to request a contested case hearing on the: Cranes Mill Rd Waste Water Treatment Plant I am an affected party in that my land is adjacent to the location of the treatment plant and I am concerned for the effects on the Edwards Aquifer, contamination of my water well that I use for drinking and the possible air pollution from the waste water. Thank you.

MWD

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 02, 2015 4:46 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** Meyer Ranch Wastewater Treatment Plant Permit No.docx

H

**From:** emartin@gvvc.com [mailto:emartin@gvvc.com]  
**Sent:** Monday, February 02, 2015 4:44 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
94054*

**REGULATED ENTITY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Elizabeth L Martin

**E-MAIL:** [emartin@gvvc.com](mailto:emartin@gvvc.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** Meyer Ranch Wastewater Treatment Plant Permit No. WQ0015314001 As a resident of Comal County with land adjacent to the proposed Meyer Ranch Wastewater Plant, permit #WQ0015314001, I strongly oppose the creation of this plant. My drinking water well is located in the Edwards Recharge Zone and there has been no environmental impact study done on this wastewater treatment plant to assure us there will not be any

*MWD*

contamination. Quite frankly, I do not even know how this can even be legal to do over the Recharge Zone. Aside from my own personal well, there are residents and ranches located along the Dry Comal Creek that will be without any doubt affected by the run off generated daily from the plant. The plan for this permit needs to be looked at very closely as their numbers do not adequately reflect the amount of gallons of discharge there will actually be. In times of heavy rain these folks will be faced with flooding, not to mention harm to their livestock and crops. Now let's look at all the other detrimental aspects from this plant. The plant will require sludge haulers to remove the sewage sludge. These large trucks will need to travel down the narrow 2 lane S. Cranes Mill Rd. and enter Highway 46 at a very dangerous area just East of downhill Westbound traffic. If the trucks decide to take another route that will take them through the Vintage Oaks neighborhood where a new elementary school is to be built. So now we have potentially deadly vehicular consequences. Please protect our residents, children, water, livestock, crops, wildlife and environment and vote AGAINST approval of the Meyer Ranch Wastewater Treatment Plant. If you are "thinking" of voting yes, please visit this area in person and see for yourself if our concerns are valid. Please, please make an informed decision as this will affect so many forever. Mr. Meyer could have required the developer to build homes on no less than 1 acre and this permit and the horrible aftermath of such a treatment plant would not have even had to be considered. This is just an environmental atrocity! I would like to ask for a public hearing on this extremely sensitive environmental disaster, known as the Meyer Ranch Wastewater Treatment Plant.

## **Meyer Ranch Wastewater Treatment Plant Permit No. WQ0015314001**

As a resident of Comal County with land adjacent to the proposed Meyer Ranch Wastewater Plant, permit #WQ0015314001, I strongly oppose the creation of this plant. My drinking water well is located in the Edwards Recharge Zone and there has been no environmental impact study done on this wastewater treatment plant to assure us there will not be any contamination. Quite frankly, I do not even know how this can even be legal to do over the Recharge Zone.

Aside from my own personal well, there are residents and ranches located along the Dry Comal Creek that will be without any doubt affected by the run off generated daily from the plant. The plan for this permit needs to be looked at very closely as their numbers do not adequately reflect the amount of gallons of discharge there will actually be. In times of heavy rain these folks will be faced with flooding, not to mention harm to their livestock and crops.

Now let's look at all the other detrimental aspects from this plant. The plant will require sludge haulers to remove the sewage sludge. These large trucks will need to travel down the narrow 2 lane S. Cranes Mill Rd. and enter Highway 46 at a very dangerous area just East of downhill Westbound traffic. If the trucks decide to take another route that will take them through the Vintage Oaks neighborhood where a new elementary school is to be built. So now we have potentially deadly vehicular consequences.

Please protect our residents, children, water, livestock, crops, wildlife and environment and vote AGAINST approval of the Meyer Ranch Wastewater Treatment Plant. If you are "thinking" of voting yes, please visit this area in person and see for yourself if our concerns are valid. Please, please make an informed decision as this will affect so many forever.

Mr. Meyer could have required the developer to build homes on no less than 1 acre and this permit and the horrible aftermath of such a treatment plant would not have even had to be considered. This is just an environmental atrocity!

I would like to ask for a public hearing on this extremely sensitive environmental disaster, known as the Meyer Ranch Wastewater Treatment Plant.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 04, 2015 9:24 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [emartin@gvtc.com](mailto:emartin@gvtc.com) [<mailto:emartin@gvtc.com>]  
**Sent:** Wednesday, March 04, 2015 9:23 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWT  
960504*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Elizabeth Martin

**E-MAIL:** [emartin@gvtc.com](mailto:emartin@gvtc.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** Request Public Meeting

*MWT*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, October 09, 2015 11:36 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** taylormartin@miglp.com [mailto:taylormartin@miglp.com]  
**Sent:** Friday, October 09, 2015 10:36 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Taylor Martin

**E-MAIL:** [taylormartin@miglp.com](mailto:taylormartin@miglp.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** I am a resident of Comal County and am dependent on well water as our only water supply. We are in the Edwards Aquifer Recharge Zone, and live on a limestone area with many faults and caves which very easily and likely would allow for fouling of wells through sewage effluent through impervious runoff into the Dry Comal Creek with its perennial flooding. I am requesting a Contested Hearing for the permit to discharge wastes under the provisions of Section 402 of the Clean Water Act and Chapter 26 of the Texas Water Code.

*MWD*

The reference TPDES permit Number is WQ0015314001 and EPA I.D. Number TX0135976. The Dry Comal Creek has no normal stream flow, permitting would allow 43-9 gallon tankers to dump into the Dry Comal Creek every 33 minutes every 24 hours. This will negatively affect the Edwards Aquifer Recharge Zone, chlorinating water into a fragile ecosystem, by products of chlorinated water into water wells for our drinking water and agriculture and livestock. The initial outflow is into the contributory zone, with only a short distance where the effluent or treated effluent can affect the Recharge Zone, with possible contamination of groundwater based. All treated effluent discharge should be prohibited according to TAC Rule 213. 6 (1) New industrial and municipal wastewater discharges into or adjacent to water in the state that would create additional pollutant loading are prohibited on the recharge zone. This permit will create additional pollutant loading. I have major concerns with the integrity of the planning of this wastewater treatment plant permit, as the original application containing numerous mistakes in descriptions of water body, terrain, flow path, and latitude error, posing doubts as to the future maintenance of plant, questioning the integrity of developer and the engineer who signed off on a direct discharge permit over the Edwards Recharge Zone to permit wastewater piped approximately three miles across the recharge zone into the contributing zone to be discharged into the headwaters of the Dry Comal Creek. If pipes break, if pumps stop working, what is to prevent discharge as impervious runoff and down the Dry Comal Creek with perennial flooding. Dense limestone flat rock, multiple caves (Karst formations) and sink holes line this recharge zone on the Meyer Ranch and throughout our property. Waste water will be flowing through this area emptying into the caves, and sinkholes and eventually into the Glenrose and Edwards Aquifers which is where I have a well for home use and livestock use. Contamination (ecoli and others) is a major concern for myself and others along the Dry Comal Creek. During high rain and flooding times leaching will occur because of the multiple perennial ponds along the creek bed. The water will collect in these areas for weeks, months and remain constant yearly. During the drilling of my water well it was discovered there is a cavern 90 feet under my property is documented on my well report filed with TCEQ. Texas Parks and Wildlife as well registered concerns with TCEQ on record Jun 18, 2015, stating errors with the permit application. The effluent should not be allowed whatsoever over the recharge zone or near water wells. Never should anything other than Class A drinking water be released in this area. I believe it is a subterfuge for the developers to draw up a plan to pump the effluent from the recharge zone up a few thousand feet and release it on the contributory zone in order to mask that will potentially occur: 390,000 gallons of effluent per day into Dry Comal Creek, waste-water contaminating the recharge zone. To members of TCEQ who are not aware, Comal County Commissioners ruled against the owners of Frankie Meyer Ranch petitioning for a WCID for the Randolph Todd development, stating the petition didn't satisfy the criteria for this developments' demand for sustainable water. The county has no control over wastewater and TCEQ isn't concerned with sustainable water supply, so it is the "consumer" who bears the consequence of TCEQ's waste water permitting of controlled waste water contaminating the ground water. The Texas bureaucracy is not protecting the water which we, and, residents downstream are dependent upon. If this permit is not denied, our water source will be downstream of where the treated sewage water will exit the proposed Meyer Ranch/ Todd Randolph Development Waste Water Treatment Facility to service an unnecessary 1,500 homes on less than 700 acres over the precious water supply serving. Based on concerns for eventual contamination of our water wells, our only water source, this permit should not be granted. Since no environmental study or water flow studies in this cavern rich area is required for this permit and it is TCEQ's responsibility is to prevent water below the surface as well as on the surface from being contaminated, TCEQ, and the owners of the wastewater treatment plant will be held responsible for contamination of our well water. A full baseline study of this well water will be submitted to TCEQ, as well as for the previous existing well, documentation which puts the burden on TCEQ and its Mission Statement and the Agency Philosophy, and what tax dollars pay this state agency to enforce.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, March 06, 2015 8:37 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [taylormartin@miglp.com](mailto:taylormartin@miglp.com) [mailto:[taylormartin@miglp.com](mailto:taylormartin@miglp.com)]  
**Sent:** Friday, March 06, 2015 7:50 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Taylor Martin

**E-MAIL:** [taylormartin@miglp.com](mailto:taylormartin@miglp.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** I request a public meeting on this permit application.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, October 09, 2015 11:36 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** tedmartin@gvtc.com [mailto:tedmartin@gvtc.com]  
**Sent:** Friday, October 09, 2015 10:34 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Ted Martin

**E-MAIL:** [tedmartin@gvtc.com](mailto:tedmartin@gvtc.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** I am a resident of Comal County and am dependent on well water as our only water supply. We are in the Edwards Aquifer Recharge Zone, and live on a limestone area with many faults and caves which very easily and likely would allow for fouling of wells through sewage effluent through impervious runoff into the Dry Comal Creek with its perennial flooding. I am requesting a Contested Hearing for the permit to discharge wastes under the provisions of Section 402 of the Clean Water Act and Chapter 26 of the Texas Water Code.

*MWD*

The reference TPDES permit Number is WQ0015314001 and EPA I.D. Number TX0135976. The Dry Comal Creek has no normal stream flow, permitting would allow 43-9 gallon tankers to dump into the Dry Comal Creek every 33 minutes every 24 hours. This will negatively affect the Edwards Aquifer Recharge Zone, chlorinating water into a fragile ecosystem, by products of chlorinated water into water wells for our drinking water and agriculture and livestock. The initial outflow is into the contributory zone, with only a short distance where the effluent or treated effluent can affect the Recharge Zone, with possible contamination of groundwater based. All treated effluent discharge should be prohibited according to TAC Rule 213. 6 (1) New industrial and municipal wastewater discharges into or adjacent to water in the state that would create additional pollutant loading are prohibited on the recharge zone. This permit will create additional pollutant loading. I have major concerns with the integrity of the planning of this wastewater treatment plant permit, as the original application containing numerous mistakes in descriptions of water body, terrain, flow path, and latitude error, posing doubts as to the future maintenance of plant, questioning the integrity of developer and the engineer who signed off on a direct discharge permit over the Edwards Recharge Zone to permit wastewater piped approximately three miles across the recharge zone into the contributing zone to be discharged into the headwaters of the Dry Comal Creek. If pipes break, if pumps stop working, what is to prevent discharge as impervious runoff and down the Dry Comal Creek with perennial flooding. Dense limestone flat rock, multiple caves (Karst formations) and sink holes line this recharge zone on the Meyer Ranch and throughout our property. Waste water will be flowing through this area emptying into the caves, and sinkholes and eventually into the Glenrose and Edwards Aquifers which is where I have a well for home use and livestock use. Contamination (ecoli and others) is a major concern for myself and others along the Dry Comal Creek. During high rain and flooding times leaching will occur because of the multiple perennial ponds along the creek bed. The water will collect in these areas for weeks, months and remain constant yearly. During the drilling of my water well it was discovered there is a cavern 90 feet under my property is documented on my well report filed with TCEQ. Texas Parks and Wildlife as well registered concerns with TCEQ on record Jun 18, 2015, stating errors with the permit application. The effluent should not be allowed whatsoever over the recharge zone or near water wells. Never should anything other than Class A drinking water be released in this area. I believe it is a subterfuge for the developers to draw up a plan to pump the effluent from the recharge zone up a few thousand feet and release it on the contributory zone in order to mask that will potentially occur: 390,000 gallons of effluent per day into Dry Comal Creek, waste-water contaminating the recharge zone. To members of TCEQ who are not aware, Comal County Commissioners ruled against the owners of Frankie Meyer Ranch petitioning for a WCID for the Randolph Todd development, stating the petition didn't satisfy the criteria for this developments' demand for sustainable water. The county has no control over wastewater and TCEQ isn't concerned with sustainable water supply, so it is the "consumer" who bears the consequence of TCEQ's waste water permitting of controlled waste water contaminating the ground water. The Texas bureaucracy is not protecting the water which we, and, residents downstream are dependent upon. If this permit is not denied, our water source will be downstream of where the treated sewage water will exit the proposed Meyer Ranch/ Todd Randolph Development Waste Water Treatment Facility to service an unnecessary 1,500 homes on less than 700 acres over the precious water supply serving. Based on concerns for eventual contamination of our water wells, our only water source, this permit should not be granted. Since no environmental study or water flow studies in this cavern rich area is required for this permit and it is TCEQ's responsibility is to prevent water below the surface as well as on the surface from being contaminated, TCEQ, and the owners of the wastewater treatment plant will be held responsible for contamination of our well water. A full baseline study of this well water will be submitted to TCEQ, as well as for the previous existing well, documentation which puts the burden on TCEQ and its Mission Statement and the Agency Philosophy, and what tax dollars pay this state agency to enforce.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, July 07, 2015 10:17 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-ELD; PUBCOMMENT-OPIC; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [tedmartin@gvtc.com](mailto:tedmartin@gvtc.com) [<mailto:tedmartin@gvtc.com>]  
**Sent:** Monday, July 06, 2015 9:49 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Ted Martin

**E-MAIL:** [tedmartin@gvtc.com](mailto:tedmartin@gvtc.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** I would like to request a contested case hearing on the: Cranes Mill Rd Waste Water Treatment Plant I am an affected party in that my land is adjacent to the location of the treatment plant and I am concerned for the effects on the Edwards Aquifer, contamination of my water well that I use for drinking and the possible air pollution from the waste water. Thank you.

*MW*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 03, 2015 4:11 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001  
**Attachments:** Meyer Ranch Wastewater Treatment Plant Permit No.docx

H

**From:** [Tedmartin@miglp.com](mailto:Tedmartin@miglp.com) [mailto:[Tedmartin@miglp.com](mailto:Tedmartin@miglp.com)]  
**Sent:** Tuesday, February 03, 2015 3:46 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWR  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME: MR Ted M Martin**

**E-MAIL: [Tedmartin@miglp.com](mailto:Tedmartin@miglp.com)**

**COMPANY:**

**ADDRESS: 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667**

**PHONE: 8302284448**

**FAX:**

**COMMENTS:** Meyer Ranch Wastewater Treatment Plant Permit No. WQ0015314001 As a resident of Comal County with land adjacent to the proposed Meyer Ranch Wastewater Plant, permit #WQ0015314001, I strongly oppose the creation of this plant. My drinking water well is located in the Edwards Recharge Zone and there has been no environmental impact study done on this wastewater treatment plant to assure us there will not be any

*MWR*

contamination. Quite frankly, I do not even know how this can even be legal to do over the Recharge Zone. Aside from my own personal well, there are residents and ranches located along the Dry Comal Creek that will be without any doubt affected by the run off generated daily from the plant. The plan for this permit needs to be looked at very closely as their numbers do not adequately reflect the amount of gallons of discharge there will actually be. In times of heavy rain these folks will be faced with flooding, not to mention harm to their livestock and crops. Now let's look at all the other detrimental aspects from this plant. The plant will require sludge haulers to remove the sewage sludge. These large trucks will need to travel down the narrow 2 lane S. Cranes Mill Rd. and enter Highway 46 at a very dangerous area just East of downhill Westbound traffic. If the trucks decide to take another route that will take them through the Vintage Oaks neighborhood where a new elementary school is to be built. So now we have potentially deadly vehicular consequences. Please protect our residents, children, water, livestock, crops, wildlife and environment and vote AGAINST approval of the Meyer Ranch Wastewater Treatment Plant. If you are "thinking" of voting yes, please visit this area in person and see for yourself if our concerns are valid. Please, please make an informed decision as this will affect so many forever. Mr. Meyer could have required the developer to build homes on no less than 1 acre and this permit and the horrible aftermath of such a treatment plant would not have even had to be considered. This is just an environmental atrocity! I would like to ask for a public hearing on this extremely sensitive environmental disaster, known as the Meyer Ranch Wastewater Treatment Plant.

## **Meyer Ranch Wastewater Treatment Plant Permit No. WQ0015314001**

As a resident of Comal County with land adjacent to the proposed Meyer Ranch Wastewater Plant, permit #WQ0015314001, I strongly oppose the creation of this plant. My drinking water well is located in the Edwards Recharge Zone and there has been no environmental impact study done on this wastewater treatment plant to assure us there will not be any contamination. Quite frankly, I do not even know how this can even be legal to do over the Recharge Zone.

Aside from my own personal well, there are residents and ranches located along the Dry Comal Creek that will be without any doubt affected by the run off generated daily from the plant. The plan for this permit needs to be looked at very closely as their numbers do not adequately reflect the amount of gallons of discharge there will actually be. In times of heavy rain these folks will be faced with flooding, not to mention harm to their livestock and crops.

Now let's look at all the other detrimental aspects from this plant. The plant will require sludge haulers to remove the sewage sludge. These large trucks will need to travel down the narrow 2 lane S. Cranes Mill Rd. and enter Highway 46 at a very dangerous area just East of downhill Westbound traffic. If the trucks decide to take another route that will take them through the Vintage Oaks neighborhood where a new elementary school is to be built. So now we have potentially deadly vehicular consequences.

Please protect our residents, children, water, livestock, crops, wildlife and environment and vote AGAINST approval of the Meyer Ranch Wastewater Treatment Plant. If you are "thinking" of voting yes, please visit this area in person and see for yourself if our concerns are valid. Please, please make an informed decision as this will affect so many forever.

Mr. Meyer could have required the developer to build homes on no less than 1 acre and this permit and the horrible aftermath of such a treatment plant would not have even had to be considered. This is just an environmental atrocity!

I would like to ask for a public hearing on this extremely sensitive environmental disaster, known as the Meyer Ranch Wastewater Treatment Plant.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 04, 2015 9:45 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [tedmartin@gvtc.com](mailto:tedmartin@gvtc.com) [<mailto:tedmartin@gvtc.com>]  
**Sent:** Wednesday, March 04, 2015 9:30 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

MWD  
94054

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Ted Martin

**E-MAIL:** [tedmartin@gvtc.com](mailto:tedmartin@gvtc.com)

**COMPANY:**

**ADDRESS:** 900 HERITAGE OAKS  
NEW BRAUNFELS TX 78132-1667

**PHONE:** 8302284448

**FAX:**

**COMMENTS:** REQUEST PUBLIC MEETING

MWD

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 11:05 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net) [mailto:[ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net)]  
**Sent:** Monday, October 12, 2015 11:01 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/20/15*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Ellen McClellan

**E-MAIL:** [ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 2282 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1604

**PHONE:** 2103327555

**FAX:** 2103327555

**COMMENTS:** I request a contested case hearing. My property is directly across from the proposed development and our well will be contaminated. Please do not allow the Randolph Todd Company to destroy our land and our water supply. I am a small voice against a wealthy company but I am confident that this will cause irreversible harm to our homes and livestock. There are other alternatives available for this company yet

*MWD*

they choose the one that will dump the cost on the taxpayers and have no regard for the people of this community.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:18 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** [ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net) [mailto:[ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net)]  
**Sent:** Saturday, October 10, 2015 7:10 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
9/10/15*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Ellen McClellan

**E-MAIL:** [ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 2282 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1604

**PHONE:** 2103327555

**FAX:**

**COMMENTS:** Please do not allow the Randolph Todd Company to destroy our land and our water supply. I am a small voice against a wealthy company but I am confident that this will cause irreversible harm to our homes and livestock. There are other alternatives available for this company yet they choose the one that will dump the cost on the taxpayers and have no regard for the people of this community.

*MWD*

TCEQ Public Meeting Form  
June 18, 2015

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Ellen McClellan

Mailing Address: 222 S Cross Mill

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

City/State: New Braunfels Tx Zip: 78130

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

Email: Ellenbydesign@sbcglobal.net ✓

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.

*mw*

① Will the Post Maps provide the exact path of the discharge.

② How will the owner prevent flooding on S. Crane Mill Road?

③

RECEIVED  
JUN 18 2015  
AT PUBLIC MEETING

me

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, April 28, 2015 10:35 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net) [mailto:[ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net)]  
**Sent:** Tuesday, April 28, 2015 10:25 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** Ellen McClellan

**E-MAIL:** [ellenbydesign@sbcglobal.net](mailto:ellenbydesign@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 2282 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1604

**PHONE:** 2103327555

**FAX:** 2103327555

**COMMENTS:** I am requesting a public meeting-- I have lived in the area where this treatment facility would be located for the last 15 years- we have experienced flooding on our road 100's of times- our property will be in a constant state of flooding and we will have the potential for the Aquifer to be contaminated with pollution.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, July 01, 2015 8:25 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [n2maxum@aol.com](mailto:n2maxum@aol.com) [mailto:n2maxum@aol.com]  
**Sent:** Tuesday, June 30, 2015 6:01 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Sandi Nott

**E-MAIL:** [n2maxum@aol.com](mailto:n2maxum@aol.com)

**COMPANY:**

**ADDRESS:** 143 DRY BEAR CRK  
NEW BRAUNFELS TX 78132-1665

**PHONE:** 8597505327

**FAX:**

**COMMENTS:** I am requesting a contested case hearing on permit WQ0015314001. I am concerned about the effects a waste water facility in this area will impact the Edwards Aquifer (the "treated" waste water is proposed to be released in the recharge zone, and to be pumped 0.8 mile from the Recharge Zone to be dumped in the Contributory Zone, directly into the headwaters of the West Fork of the Dry Comal Creek). I believe this circumvents the TCEQ rule 213 of not being allowed to dump directly into the Recharge Zone, but can legally

*140*

dump into Contributory Zone. There will be bacteria effects on Dry Comal Creek River Segment 1811A which is already on the EPA list to be managed by TCEQ (category 5) for excessive bacteria. The impact this will have in the 100 year Effects on the Edwards Aquifer (the waste water is being 'treated' in the recharge zone, and being pumped up 0.8 mile from the Recharge Zone to be dumped in the Contributory Zone, directly into the headwaters of the West Fork of the Dry Comal Creek). This is the developer's way to circumvent the TCEQ rule 213 of not being allowed to dump directly into the Recharge Zone, but can legally dump into Contributory Zone. There will potentially be Increased bacteria effects on Dry Comal Creek River Segment 1811A which is already on the EPA list to be managed by TCEQ (category 5) for excessive bacteria. There will also be a great Impact in the 100 year flood plain thru which much of the Dry Comal Creek traverses. Much flooding occurs in a normal year for the projected path of effluent water.

TCEQ Public Meeting Form  
June 18, 2015

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Sandy Nott

Mailing Address: 143 Dry Bear Creek

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

City/State: New Braunfels, TX Zip: 78132

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

Email: N2MAXUM@aol.com ✓

Phone Number: 859-750-5327

• 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*

Please Submit Written Comment

Poor effluent quality from Sewage Treatment Plants is one of the root causes of water pollution.

This is the risk we face with Approval of this permit.

In addition, it is reckless to permit any person or LLC to submit a permit application without proper sewage treatment infrastructure planning and risk management, regardless of the law.

I am against issuing this permit!

Sandy L. Nott

RECEIVED

JUN 18 2015

AT PUBLIC MEETING

MW

**Interested Person**  
 Number 180636 Request Received Date 02/17/2015 Last Polling Date   Legislator  
 Comment

**Individual**  
 Concerned Citizen Last Name PAPPAS Suffix  Prefix  First Name R  
 Middle Name  Title   
 Organization

**Address**  
 Building/Mail Drop   Interagency  Valid  
**Detail**  
 Street/PO Box 1100 HOMESTEAD RDG   
 City NEW BRAUNFELS State TX Zip 78132 1605  
 Country UNITED STATES Foreign Postal Code

**Phone Number/Email ID**  
**Phone**  
 Country Code  Area Code 830 Number 8856016 Extension  Updated 02/17/2015  
**Fax**  
 Country Code  Area Code  Number  Extension  Updated   
**Email ID**  
 rpappas@rocketmail.com Updated 02/17/2015

Delivery Method

Type

Date  Time   AM  PM

Acknowledgment Date

Protestant Comments

Our property borders the Meyer ranch and I am extremely opposed to a development of high density development that will require a waste water treatment plant. The proposed discharge into the Dry Comal Creek, which is in the Edwards aquifer recharge zone, is environmentally unacceptable. This permit has potential to directly impact our well water quality. I am requesting a contested case hearing.

Documents

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**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 04, 2015 8:46 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [RAP13514@aol.com](mailto:RAP13514@aol.com) [mailto:RAP13514@aol.com]  
**Sent:** Tuesday, March 03, 2015 8:13 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
PLEASE*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Rick Peyton

**E-MAIL:** [RAP13514@aol.com](mailto:RAP13514@aol.com)

**COMPANY:**

**ADDRESS:** 1015 PROVENCE PL  
NEW BRAUNFELS TX 78132-2769

**PHONE:** 8328686919

**FAX:**

**COMMENTS:** I respectfully request a public hearing on this application. As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the

*MWD*

construction and operation of this waste treatment facility • An increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 24, 2015 12:51 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** [RAP13514@aol.com](mailto:RAP13514@aol.com) [mailto:RAP13514@aol.com]  
**Sent:** Tuesday, February 24, 2015 12:15 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd*  
*96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Rick Peyton

**E-MAIL:** [RAP13514@aol.com](mailto:RAP13514@aol.com)

**COMPANY:**

**ADDRESS:** 1015 PROVENCE PL  
NEW BRAUNFELS TX 78132-2769

**PHONE:** 8328686919

**FAX:**

**COMMENTS:** As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the construction and operation of this waste treatment facility • An

*me*

increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, March 04, 2015 8:46 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [speyton53@icloud.com](mailto:speyton53@icloud.com) [mailto:[speyton53@icloud.com](mailto:speyton53@icloud.com)]  
**Sent:** Tuesday, March 03, 2015 8:17 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
940526*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME: MRS Sandy Peyton**

**E-MAIL: [speyton53@icloud.com](mailto:speyton53@icloud.com)**

**COMPANY:**

**ADDRESS: 1015 PROVENCE PL  
NEW BRAUNFELS TX 78132-2769**

**PHONE: 8308852397**

**FAX:**

**COMMENTS:** I respectfully request a public hearing on this application. As a land owner and resident of Texas / Comal County / and Vintage Oaks, I wish to express my concerns related to the pending permit # WQ0015314001 and the possible effects on Edwards Aquifer, flooding, impact to the 100 year flood plan, and the surrounding environment. Inclusive of the items mentioned previously, if this permit were to be approved it would result in: • An increase in noise levels in what is currently a quiet rural type setting through the

*MWD*

construction and operation of this waste treatment facility • An increase in truck traffic through the construction and operation of this waste treatment facility • A negative impact on property values of the surrounding area including the Vintage Oaks area. There are also pending permits for up to 2 other similar facilities in very close proximity. I urge the Commission to consider all the concerns mentioned and reject this permit.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 8:18 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [pritter@gvvc.com](mailto:pritter@gvvc.com) [mailto:[pritter@gvvc.com](mailto:pritter@gvvc.com)]  
**Sent:** Saturday, October 10, 2015 9:13 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Phyllis Yvonne Ritter

**E-MAIL:** [pritter@gvvc.com](mailto:pritter@gvvc.com)

**COMPANY:**

**ADDRESS:** 2360 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1618

**PHONE:** 8309042042

**FAX:**

**COMMENTS:** I, Phyllis Y. Ritter, am an "affected person," and request a contested case hearing on Permit No. WQ0015314001. I reside at 2360 S. Cranes Mill Road, which is .3 of a mile from the Dry Comal Creek, and directly across the road from the Franklin Meyer Ranch. We have two (2) water wells on our property, which are used for water consumption and usage for our home and for watering our cattle. Response #39 of the Executive Director's Response to Public Comment stated, "While the TSWQS and the IPs do not specifically

*Mu*

designate criteria for the protection of cattle or wildlife, they do designate criteria for the protection of aquatic life that should preclude negative impacts to the health and performance of cattle or wildlife." Also, "The Commission does not have specific water-quality based effluent limitations for cattle." Because there is no specific answer for the impact to cattle, there could be harmful effects to our calf/cow operation, which would affect our business. We purchased our property in 1994, and during this timeframe, our water wells have been contaminated several times through the flooding and run-off water from the Franklin Meyer Ranch into the Dry Comal Creek. Response #31 states, "The rules state that the Chief Operator or Operator with the required C level of license or higher must be present at the facility five (5) days per week and available by phone or pager seven (7) days per week." My concern is there could be a major flood or breakdown at this facility at the time the Operator is not on site. Out of 168 hours in a week, the operator would be on-site for only about 40 hours per week. Therefore, there could be a major issue, which could change the dynamics of the control of the wastewater discharge, which could lead to possible contamination of our water wells. Additionally, when flooding occurs on the Dry Comal Creek, South Cranes Mill Road has been closed many times, therefore, the Operator may not be able to get to the Wastewater Plant. Comment #15 states, "Several commenters expressed concern that 390,000 gallons of sewage would be discharged into a dry creek, which would pose a threat to human health and the surrounding environment. Additionally, several individuals stated that they are against a direct discharge into Dry Comal Creek." Response #15 did not directly state that there would be no threat to human health. In summary, I believe our cattle operation business, and my health and safety are at risk with the approval of the Texas Pollutant Discharge Elimination System (TPDES) Permit #WQ0015314001.

TCEQ Public Meeting Form  
June 18, 2015

15

Randolph Kodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Phyllis Y. Ritter

Mailing Address: 2360 S. Crane Mill Road

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

City/State: New Braunfels, TX Zip: 78132

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

Email: Ritter@gate.com ✓

Phone Number: (830) 904-2042

• 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. ✓

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

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

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

*mm*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 02, 2015 8:04 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [ritter@gvvc.com](mailto:ritter@gvvc.com) [<mailto:ritter@gvvc.com>]  
**Sent:** Saturday, January 31, 2015 1:39 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
960516*

**REGULATED ENTITY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Phyllis Y Ritter

**E-MAIL:** [ritter@gvvc.com](mailto:ritter@gvvc.com)

**COMPANY:**

**ADDRESS:** 2360 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1618

**PHONE:** 8309042042

**FAX:**

**COMMENTS:** We, John & Phyllis Ritter, object to the proposed Permit #WQ0015314001 (EPA ID #TX0135976), which would authorize the discharge of treated wastewater, and the construction of a wastewater treatment facility at 2959 S. Cranes Mill Road, for the following reasons: 1. Our property consists of a home and 33.62 acres, which is located directly across the road from the Frankie Meyer Ranch at 2959 S. Cranes Mill Road. We purchased this land 20+ years ago to raise and graze cattle, & we have two (2) water wells, which are

*MWD*

used for our home & for watering our stock. During this timeframe, the dry Comal Creek has flooded many times, and our drinking water well has been contaminated from the flooding. If flooding alone can cause contamination of the wells, then where is the guarantee that the 390,000 gallons of wastewater, combined with any runoff, will be clean enough for us to drink? We know we need to get our water tested when flooding occurs, but how will we know if there is a problem when there is a daily release of this quantity of wastewater mixed with general rainfall, & who will be responsible for ensuring our water wells are safe for drinking by us and the cattle? 2. A rainfall amount of 2+ inches will fill up our stock tank and overflow at the back of our property into the dry Comal Creek. This run-off, coupled with the run-off from the Meyer ranch alone can cause the dry Comal Creek on South Cranes Mill Road to flood. What will happen to the homes & businesses along the dry Comal Creek when you add the daily 390,000 gallons of wastewater to this run-off? 3. Our property is a few hundred feet from the beginning of the Edwards Aquifer Recharge Zone. With the addition of another 1500 homes, with four (4) homes to each acre, many miles of asphalt, & another well system being drilled to supply these homes, there will be less water going into the Edwards Aquifer. When the wells go dry at our homes & businesses, who will supply the water? 4. The main well that supplies water for our cattle has gone dry several times since 2006, & we had to hook up a water supply for the cattle from our home well. With the addition of yet another water well system, who will supply the water for the cattle in our area that provide food for all of us? 5. Because of the drought, we lost approximately twenty (20) 5-6 year old oak trees and about six (6) 25-50 year old oak trees on our ranch between 2006-2011. What will happen to the beautiful hill country when the oak trees are gone, because of the shortage of water in the ground? In summary, we understand the reason people are selling off their farms and ranches because of the value of property, and the inability to make a living from the land. However, there is a right way to move forward with this change in the dynamics of our beautiful hill country. Vintage Oaks backs up to our land, and is a good example of a way to handle the construction and development of these ranches. When you have four (4) homes to an acre, there is not much room for the rain water to refill the Edwards Aquifer. However, when you reduce this amount to one (1) home per acre, there is a greater chance of the water recharging the Aquifer. Also, Vintage Oaks receives their water from the Canyon Lake Water Supply, which decreases the chances of our water wells going dry. By implementing these strongly recommended changes, there will be no need for a Wastewater Treatment Facility since each home will have their own septic system. The new septic systems with sprinklers can also provide water for the yards, trees, and/or vegetation growing on the property instead of the water draining into the "Dry" Comal Creek. For these reasons & many more, we, John & Phyllis Ritter (2360 S. Cranes Mill Road, New Braunfels, TX 78132-1618, Phone #830-904-2042), adamantly oppose the TPDES Permit #WQ0015314001 (EPA I.D. #TX0135976, & request a public meeting.

Interested Person

Number 180418

Request Received Date 02/10/2015

Last Polling Date

Legislator

Comment

Empty comment box

Individual

Concerned Citizen Last Name SMITH Suffix Prefix First Name JESSICA

Middle Name Title

Organization THE SPRINGS EVENTS  More

Address

Building/Mail Drop  Interagency  Valid

Detail Street/PO Box PO BOX 936

City DRIPPING SPRINGS State TX Zip 78620 0936

Country UNITED STATES Foreign Postal Code  More

Phone Number/Email ID

Phone Country Code Area Code 830 Number 3053971 Extension Updated 02/10/2015

Fax Country Code Area Code Number Extension Updated

Email ID jessicasmith@thespringsevents.com Updated 02/10/2015

- [Additional IDs](#)
- [Counties](#)
- [Principals](#)
- [Regulated Entities](#)
- [Items](#)

- 
- 
- 
-

Delivery Method

Type

Date  Time   AM  PM

Acknowledgment Date

We own a property at 1723 Herbelin Rd., New Braunfels, TX 786130, (on the other side of Hwy. 46 from the proposed site) and we would like to petition to have a public hearing about the proposed Waste Water Treatment Plant. We would like to hear all of the facts and voice our concerns if there are any. We own a venue business and would like to be able to defend the future of that business if needs be. Thank you.

Documents

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**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 3:58 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [brsturdy@hotmail.com](mailto:brsturdy@hotmail.com) [mailto:[brsturdy@hotmail.com](mailto:brsturdy@hotmail.com)]  
**Sent:** Monday, October 12, 2015 3:55 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
9/6/56*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MRS Brenda R Sturtevant

**E-MAIL:** [brsturdy@hotmail.com](mailto:brsturdy@hotmail.com)

**COMPANY:**

**ADDRESS:** 1170 SAPLING SPG  
NEW BRAUNFELS TX 78132-2676

**PHONE:** 8308855186

**FAX:**

**COMMENTS:** I would like a contested hearing. I am concerned about the Edwards Aquifer, quality of water, and future tourism for Comal County. If Vintage Oaks is successful in their proposed waste water plant, these plants are located too close together.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 4:42 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [jwsturdy@hotmail.com](mailto:jwsturdy@hotmail.com) [<mailto:jwsturdy@hotmail.com>]  
**Sent:** Monday, October 12, 2015 4:40 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** John W Sturtevant

**E-MAIL:** [jwsturdy@hotmail.com](mailto:jwsturdy@hotmail.com)

**COMPANY:**

**ADDRESS:** 1170 SAPLING SPG  
NEW BRAUNFELS TX 78132-2676

**PHONE:** 8308855186

**FAX:**

**COMMENTS:** The sewer plant and the Vintage oaks sewer plant are to close together, less than 3 miles. I am concerned about the Edwards recharge zone. I request a contested case hearing.

*MW*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 09, 2015 8:37 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [cfterao@yahoo.com](mailto:cfterao@yahoo.com) [mailto:[cfterao@yahoo.com](mailto:cfterao@yahoo.com)]  
**Sent:** Sunday, February 08, 2015 12:10 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Connie Terao

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

**COMPANY:**

**ADDRESS:** 2241 APPELLATION  
NEW BRAUNFELS TX 78132-2774

**PHONE:** 8308854731

**FAX:**

**COMMENTS:** I am writing to request a public hearing in regards to the above permit request WQ0015314001, a proposal for a waste water treatment plant in Comal County of the Edwards Aquifer Recharge Zone. The proposed plant is for the benefit of one at the expense of many. The proposed plant will have negative effects on the environment and all the people, plants and animals that call this area home in addition to all those that rely on the Edwards Aquifer for their water. The runoff from this plant will create flooding hazards for all of those

*MWD*

downstream from the plant. The runoff (treated effluent) from this plant will go into the Dry Comal Creek which is a 100 year flood plain area. With the addition of more water to this flood plain area the flooding issues (flooded rural roads, homes, and the destruction of plants and animal homes) will be more frequent and more severe. The proposed plant will be located in an Edwards Aquifer Recharge Zone. If/when (accidents do happen) untreated effluent/raw sewage is released into this Recharge Zone the water of all that rely on the Edwards Aquifer for their water will be adversely affected as well as those that live in the area. Those affected will include people, plants and animals that rely on this water. Some of those plants and animals could be on the endangered species list. The plant owner cannot guarantee that all the runoff will meet water quality guidelines. Accidents happen and damage will be done before it is known that the water quality has been adversely affected. The treated effluent will have negative impacts on the plants and animals that will drink the runoff. The plants will benefit the developer and the some 1500 families that will call the proposed development home but, what about the property rights of the other residents in the area that will be affected by the plant? Do they not have the right to live in an area with clean water for people, plants and animals? To live in an area that we do not have to worry about which way the wind is blowing today and the affect of the air quality around them? Our country is based on individual rights but what makes the rights of one so much more important than the rights of others. This plant benefits the developer while deny the rights of clean water to many others. I'm not against development, I'm against development for a few that has a negative impact on many. As a resident of the Edwards Aquifer Recharge Zone I feel the development in this highly sensitive area should be well planned out so as to limit the negative effects on the people, plants and animals that call this area home in addition to all of those not in the area that rely on the Edwards Aquifer for their water. The negative effects of this proposed plant are far reaching across our great state. Therefor, I am requesting a public hearing so the voices of all concerned can be heard.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Friday, March 13, 2015 10:33 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [cfterao@yahoo.com](mailto:cfterao@yahoo.com) [<mailto:cfterao@yahoo.com>]  
**Sent:** Wednesday, March 11, 2015 10:41 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
960516*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Connie Terao

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

**COMPANY:**

**ADDRESS:** 2241 APPELLATION  
NEW BRAUNFELS TX 78132-2774

**PHONE:** 2149238986

**FAX:**

**COMMENTS:** As a resident of Comal County and the VO subdivision, I hereby request a public meeting on this permit. I'm concerned with the affects of this plant on the Edwards Aquifer, the Dry Comal Creek and the environment.

*MWD*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 09, 2015 8:39 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [fthomas8of8@gmail.com](mailto:fthomas8of8@gmail.com) [<mailto:fthomas8of8@gmail.com>]  
**Sent:** Saturday, February 07, 2015 11:08 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
960510*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MS Felicia S Thomas

**E-MAIL:** [fthomas8of8@gmail.com](mailto:fthomas8of8@gmail.com)

**COMPANY:**

**ADDRESS:** 1128 PROVENCE PL  
NEW BRAUNFELS TX 78132-2770

**PHONE:** 8308852264

**FAX:**

**COMMENTS:** I have concerns regarding the "waste water treatment facility" plan under consideration for 1500 homes on what is the current Meyer's Ranch. My concerns are as follows: It is our understanding there are multiple errors with the permit application itself. I am concerned that adequate studies have not been done to determine the impact of this "waste water treatment facility" to the areas in the 100 year flood plain should a flood occur. The last time a substantial flood occurred in the area all of this was ranch land. This is not longer

*MWD*

the case. Now there are several neighborhoods, and there are to be 1500 homes on Meyers Ranch. If this area should flood and the water should invade this aerobic treatment facility, servicing these 1500 homes what impact would it have on those homes, the surrounding homes, Dry Comal Creek and the Edwards Aquifer recharge zone and the Aquifer itself. An aerobic system of that size seems inappropriate over an Edwards Aquifer recharge zone. The possibility of a sewage spill or overflow seems high. Each home owner in this subdivision has this type of system on a smaller scale and many have already had problems. I would hate to imagine these problems on the scale that would occur to a system servicing 1500 homes and what impact this would have on the aquifer and Dry Comal Creek. Have adequate impact studies been done for Dry Comal Creek with additional amount of water being discharged? What if effluent is discharged into the creek? Will all discharged be adequately diluted? There have been reports that even the New Braunfels water treatment plants have had difficulty with this of late due to the water restrictions and low flow water devices in use. The amount of effluent that will have to be hauled out of the area will be substantial. This effluent will be hauled over a winding, narrow, two lane, dark country road. There will be a large amount of spillage (I have seen this in other areas I have lived and it is very unpleasant). This will expose the entire area to potential bacterial and viral exposure. This will also expose the entire area to very unpleasant odors from the waste being moved and the spillage on this road as well as TX Hwy 46. The odor from the "waste water treatment facility" will have an impact on our entire community. In Houston I had to drive close to a waste water treatment plant and the odor was frequently over whelming. I was fortunate that I did not live close to it. I would have had to move. In closing, I feel that this "waste water treatment facility" will have a very negative impact on all property values in Vintage Oaks and the surrounding area. Consideration of a public hearing on this matter is greatly appreciated.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 03, 2015 3:08 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [lcthompson54@gmail.com](mailto:lcthompson54@gmail.com) [<mailto:lcthompson54@gmail.com>]  
**Sent:** Tuesday, February 03, 2015 2:45 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER: RN107818577**

**PERMIT NUMBER: WQ0015314001**

**DOCKET NUMBER:**

**COUNTY: COMAL**

**PRINCIPAL NAME: RANDOLPH TODD COMPANY LLC**

**CN NUMBER: CN604698464**

**FROM**

**NAME:** Carl Thompson

**E-MAIL:** [lcthompson54@gmail.com](mailto:lcthompson54@gmail.com)

**COMPANY:**

**ADDRESS:** 1026 STRADINA  
NEW BRAUNFELS TX 78132-2778

**PHONE:** 7138994247

**FAX:**

**COMMENTS:** A full hearing needs to be held regarding the installation of this proposed sewage treatment plant. I believe that Dry Comal Creek is not suitable for discharge of waste water and a full environmental review needs to be under taken as well as a study showing possible flooding impacts resulting from the discharge of 390,000 gallons/day. The public also has the right to be allowed an opportunity to speak. All homes in this area are on septic for a reason, Dry Comal Creek is not suitable. If these developers choose to

*Crw*

build this subdivision then it should also be on a septic system like all other homes in the area. They are merely looking for a way to lower there home prices rather than installing individual septic systems for each home. Why would you risk the Edwards Aquifer water quality for one subdivision, this very irresponsible. Further, the proposed plant is no more than a large version of a home septic system. I am surprised that it has gotten this far in the approval process, it should have already been struck down. I look forward to a full hearing and review.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 3:20 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** rori.white@gmail.com [mailto:rori.white@gmail.com]  
**Sent:** Monday, October 12, 2015 3:05 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd  
9/10/15*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Aurora Dozier White

**E-MAIL:** [rori.white@gmail.com](mailto:rori.white@gmail.com)

**COMPANY:**

**ADDRESS:** 2230 PINOT BLANC  
NEW BRAUNFELS TX 78132-4800

**PHONE:** 5127099512

**FAX:**

**COMMENTS:** I, Aurora White, a resident of Comal County, request a Contested Case Hearing. I live approximately 1.5 to 1.75 miles from the proposed facility. I will be directly affected by this waste treatment facility because we receive water from wells that penetrate the Trinity/Edwards aquifer. I am also very concerned that the applicant has, basically, circumvented TCEQ Rule 213.6 by pumping the treated waste water uphill into the Edwards Aquifer contributing zone, then is discharging it back downhill over the Recharge Zone

*MW*

via Dry Comal Creek. If the TCEQ, the State of Texas, and/or our elected officials will not protect the environment in and around the aquifer recharge zone, who will? It is not good enough to simply comply with the rules as they are written when all of us who depend on water from the aquifer will be affected.

TCEQ Public Meeting Form  
June 18, 2015

#11

Randolph Todd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Aurora White

Mailing Address: 2230 Pinot Blanc

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

City/State: New Braunfels, TX Zip: 78132

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

Email: rori.white@gmail.com ✓

Phone Number: 512-709-9512

• 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

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, March 06, 2015 10:31 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

PM

**From:** [rori.white@gmail.com](mailto:rori.white@gmail.com) [mailto:[rori.white@gmail.com](mailto:rori.white@gmail.com)]  
**Sent:** Friday, March 06, 2015 9:34 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Aurora White

**E-MAIL:** [rori.white@gmail.com](mailto:rori.white@gmail.com)

**COMPANY:**

**ADDRESS:** 2230 PINOT BLANC  
NEW BRAUNFELS TX 78132-4800

**PHONE:** 5127099512

**FAX:**

**COMMENTS:** I REQUEST A PUBLIC MEETING. Thank you.

*MW*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 18, 2015 4:52 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

**From:** [rori.white@gmail.com](mailto:rori.white@gmail.com) [mailto:[rori.white@gmail.com](mailto:rori.white@gmail.com)]  
**Sent:** Wednesday, February 18, 2015 4:44 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** Rori White

**E-MAIL:** [rori.white@gmail.com](mailto:rori.white@gmail.com)

**COMPANY:**

**ADDRESS:** 2230 PINOT BLANC  
NEW BRAUNFELS TX 78132-4800

**PHONE:** 5127099512

**FAX:**

**COMMENTS:** I live in the Vintage Oaks subdivision on a little over an acre. I am required to provide my own septic system and disperse the effluent over a portion of my backyard. I am concerned with the amount of effluent that will be dispersed into the Dry Comal Creek, eventually finding it's way into the Edward's aquifer. Please reconsider this permit, or at the very least, give those of us who care about the aquifer and Dry Comal Creek an opportunity to voice our concerns. Thank you.

*MW*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 12, 2015 3:19 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [randy@rwisi.com](mailto:randy@rwisi.com) [mailto:[randy@rwisi.com](mailto:randy@rwisi.com)]  
**Sent:** Monday, October 12, 2015 3:06 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*mwd*  
*96056*

**REGULATED ENTY NAME** MEYER RANCH

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** MR Randal Dean White

**E-MAIL:** [randy@rwisi.com](mailto:randy@rwisi.com)

**COMPANY:**

**ADDRESS:** 2230 PINOT BLANC  
NEW BRAUNFELS TX 78132-4800

**PHONE:** 8132209220

**FAX:**

**COMMENTS:** I, Randal White, a resident of Comal County, request a Contested Case Hearing. I live approximately 1.5 to 1.75 miles from the proposed facility. I will be directly affected by this waste treatment facility because we receive water from wells that penetrate the Trinity/Edwards aquifer. I am also very concerned that the applicant has, basically, circumvented TCEQ Rule 213.6 by pumping the treated waste water uphill into the Edwards Aquifer contributing zone, then is discharging it back downhill over the Recharge Zone

*MW*

via Dry Comal Creek. If the TCEQ, the State of Texas, and/or our elected officials will not protect the environment in and around the aquifer recharge zone, who will? It is not good enough to simply comply with the rules as they are written when all of us who depend on water from the aquifer will be affected.

TCEQ Public Meeting Form  
June 18, 2015

10

Randolph Rodd Company, LLC  
TPDES Water Quality  
Permit No. WQ0015314001

PLEASE PRINT

Name: Randy White

Mailing Address: 2230 Pinot Blanc

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

City/State: New Braunfels, TX Zip: 78132

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

Email: randy@rwise.com ✓

Phone Number: 813-220-9220

• 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.

MWJ

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 09, 2015 1:02 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

*MWD  
94054*

H

**From:** [james.whitmore1@gmail.com](mailto:james.whitmore1@gmail.com) [<mailto:james.whitmore1@gmail.com>]  
**Sent:** Monday, February 09, 2015 12:09 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** James A Whitmore

**E-MAIL:** [james.whitmore1@gmail.com](mailto:james.whitmore1@gmail.com)

**COMPANY:** President, Waggener Ranch Property Owners Association

**ADDRESS:** 4802 S CRANES MILL RD  
NEW BRAUNFELS TX 78132-1647

**PHONE:** 9406138367

**FAX:**

**COMMENTS:** Waggener Ranch is a gated 830 acre community located at 4802 South Cranes Mill Road in close proximity to the proposed sewage plant. Although we are not opposed to development in the area, we do have several concerns that need to be addressed before this permit is granted. First, it is our understanding that this new facility may produce more than 350,000 gallons of daily effluent that will be discharged into the Dry Comal Creek area. Will this discharge be treated to drinking water quality with no odor to minimize any

*MWD*

adverse environmental affects on the Edwards Aquifer Recharge Zone? Second, will the increased truck traffic needed to service the plant require widening of South Cranes Mill Road? If so, what is the timing? Third, if the Meyer Ranch development being serviced by this facility uses the water supply utility (Canyon Lake Water Services Company), where will they tap into existing main water lines? Is their water source Canyon Lake or wells that tap into the Edwards Aquifer and/or Trinity/Glen Rose Aquifer? Any environmental impact study required before issuing a permit to supply water? These are just a few of the many questions our residents have with respect to the new sewage treatment plant. I believe a public hearing to fully discuss Comal County resident concerns is appropriate.

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, September 08, 2015 8:31 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0015314001

H

**From:** [james.whitmore1@gmail.com](mailto:james.whitmore1@gmail.com) [<mailto:james.whitmore1@gmail.com>]  
**Sent:** Monday, September 07, 2015 1:30 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0015314001

*MWD  
96056*

**REGULATED ENTY NAME MEYER RANCH**

**RN NUMBER:** RN107818577

**PERMIT NUMBER:** WQ0015314001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** RANDOLPH TODD COMPANY LLC

**CN NUMBER:** CN604698464

**FROM**

**NAME:** GEN James A Whitmore

**E-MAIL:** [james.whitmore1@gmail.com](mailto:james.whitmore1@gmail.com)

**COMPANY:** USAF, Retired

**ADDRESS:** 257 DRY BEAR CRK  
NEW BRAUNFELS TX 78132-1633

**PHONE:** 8308854795

**FAX:** 8308854795

**COMMENTS:** I am strongly against approval of this permit and respectfully request a contested hearing case due to the detrimental environmental impacts this permit would facilitate. Specifically, my concerns include: a) The effects on the Edwards Aquifer (the waste water would be 'treated' in the recharge zone, then pumped up 0.8 mile from the Recharge Zone to be dumped in the Contributory Zone, directly into the headwaters of the West Fork of the Dry Comal Creek). This appears to be an attempt to circumvent TCEQ rule 213 - not being

*MWD*

allowed to dump directly into the Recharge Zone, but legally dump into Contributory Zone. b) Increased bacteria effects on Dry Comal Creek River Segment 1811A, already on the EPA list to be managed by TCEQ (category 5) for excessive bacteria c) Impact to the 100 year flood plain thru which much of the Dry Comal Creek traverses d) The threat to property rights of the current landowners I appreciate your consideration.