

SLG  
86086

Dear Office of the Chief Clerk,  
el Darlene G. Aguilar live in  
Victoria, Texas at 602 Dunbar  
Dr. 77904

el am writing this to you  
to let you know that el sure  
oppose to the permit application  
number WQ-000466600.

REVIEWED

JAN 20 2016

By: MP

CHIEF CLERKS OFFICE

2016 JAN 21 AM 9:55

TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
OFFICE OF THE CHIEF CLERK

MP

Dear  
office of the Chief Clerk  
Tef an Commission of Environmental Quality  
Mail code MC-105, P.O. BOX 13087  
Austin, TX 78711

My name is Richard Aguilar  
and I live in Victoria TEXAS @ 1002 Furber Dr.  
I am writing this letter to inform  
you that I oppose the renewal of  
Permit application WQ 0004666 000.

I have witnessed the deterioration  
of our rivers & Bay in the past 20  
yrs., and I think this kind of  
waste introduction into the land  
will have a negative effect on  
the quality of our environment.

I have 8 grand children and I  
worry about the water, land, and air  
quality they will have to live with  
I want them to enjoy Texas as  
I have in my lifetime.

Thank You  
Sincerely

Richard Aguilar

Richard

Aguilar

**SLG**  
**86086**

TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
CHIEF CLERK'S OFFICE  
706 W. 9th St. M.C. 105  
AUSTIN, TEXAS 78711

mw

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, January 06, 2015 5:02 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** 01.06.15 BLM Comments.pdf

*SLG*  
*Booble*

**From:** [sam@lf-lawfirm.com](mailto:sam@lf-lawfirm.com) [<mailto:sam@lf-lawfirm.com>]  
**Sent:** Tuesday, January 06, 2015 4:35 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Eric Allmon

**E-MAIL:** [sam@lf-lawfirm.com](mailto:sam@lf-lawfirm.com)

**COMPANY:** Frederick, Perales, Allmon & Rockwell, P.C.

**ADDRESS:** 707 RIO GRANDE ST 200  
AUSTIN TX 78701-2719

**PHONE:** 5124696000

**FAX:**

**COMMENTS:** Please see attached comments submitted on behalf of Clean Water Action, Texas Campaign for the Environment, the Texas Center for Policy Studies, and the Caddo Lake Institute.

*MW*

FREDERICK, PERALES, ALLMON & ROCKWELL, P.C.

ATTORNEYS AT LAW  
707 Rio Grande, Suite 200  
Austin, Texas 78701  
(512) 469-6000 • (512) 482-9346 (facsimile)  
Info@LF-LawFirm.com

Of Counsel:  
Richard Lowerre

January 6, 2015

Ms. Bridget C. Bohac, Chief Clerk  
TCEQ, MC-105  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Application of Beneficial Land Management, L.L.C. to Renew and Amend its Permit No. WQ0004666000 for its land disposal of sludge and other wastes from a domestic wastewater treatment plant and other activities.

Dear Ms. Bohac:

Clean Water Action, Texas Campaign for the Environment, the Texas Center for Policy Studies, and the Caddo Lake Institute submit these comments on the above referenced renewal and amendment application. Commenters are very concerned with the precedent that would be set with the approval of this application. Commenters oppose the issuance of this renewal and amendment.

**Inappropriate authorization for disposal of grease and grit trap waste**

First, the proposal seeks “beneficial use” of wastes, including grease and grit trap wastes. By this application, Beneficial Land Management (BLM) seeks to circumvent the requirements of TCEQ’s rules governing the disposal of solid waste. BLM previously sought to have this activity authorized through TCEQ’s solid waste program, and it is now resorting to a water quality application simply because the activity cannot be shown to be safe within the standards applied in the waste program. BLM seeks to land apply material that falls squarely within the definitions of “Grease trap waste” and “Grit trap waste” set forth at 30 TAC §§ 330.3(59) and 330.3(60), respectively. TCEQ’s rules applicable to solid waste do not allow the disposal of such wastes in the manner that BLM applies the wastes at the site.

BLM should not be able to endanger public health by moving forward under the pretense that the material being applied is “sewage sludge” that is being “beneficially” used. TCEQ’s rules define “sewage sludge” as “Solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in treatment works.” 30 TAC § 312.8(74). “Domestic Sewage” in turn is defined as “Waste and wastewater from humans or household operations that is discharged to a wastewater collection system or otherwise

enters a treatment works.” 30 TAC § 312.8(27). The grease and grit trap waste which BLM seeks to land apply originates at commercial establishments, and not from humans or household operations. This grease and grit trap material is not somehow converted into “domestic sewage” simply because it has been mixed with waste of human and household origin.

If grease and grit trap waste can be “converted” to sewage sludge simply by blending it with domestic sewage, then any solid waste could be mixed with human waste and re-characterized as “sewage sludge.” This approach undermines TCEQ’s rules regarding municipal solid waste. What is to keep someone from mixing used oil or medical wastes with domestic sludge in the same manner, thereby avoiding regulations applicable to those wastes?

When applied in proper amounts in accordance with responsible practices, waste and wastewater originating from humans and household operations are utilized effectively by vegetation at an application site. This is not true of grease and grit trap wastes. Such wastes are not utilized to nearly the same degree. Instead, the heavy metals and other contaminants in these wastes simply accumulate at the site, and eventually runoff from the site or leach into the groundwater. In the long term, this results in damage to the environment and the endangerment of human health and safety. The practice proposed by applicant can cause run-off of petroleum, oils and metals, create significant odors, and attract vectors that could carry off waste materials or create nuisance conditions.

Further, this application seeks a change from BLM’s current permit, which does not allow for such disposal. Thus, this application seeks a major amendment, not just a “change” to the permit, to allow an experimental practice that is not authorized under Texas law.

Moreover, that experimentation has taken place under an enforcement agreement with the applicant. Yet the applicant has not shown that these waste materials can be beneficially used through land application or will not create significant risks to public health and the environment. (Commenters believe that the enforcement agreement was contrary to the law, but that agreement provided BLM with a sufficient opportunity by which to demonstrate the material to be safe if that had in fact been the case)

Any such change in interpretation of Texas law on management of the waste materials or what material may be applied with sewage sludge must be done through rule making, not ad hoc permit actions. Approval of the application will affect more than one facility; it will have statewide implications.

## Impacts of Sewage Sludge

### Aggravation of Downstream Impairments

The permit is also not protective in light of the impacts of the sewage sludge itself. The application indicates that the fields are located within the drainage area of Segment 2435. It appears, however, that runoff from many (if not all) of the fields will drain to Arenosa Creek (Segment 2453C). Since 2010, TCEQ has recognized that this water body is impaired due to excessive levels of bacteria. Further downstream, Lavaca Bay is recognized as of concern for elevated levels of nutrients. The proposed land application will also potentially contribute to continuing or worsening these conditions in Arenosa Creek and Lavaca Bay.

### Insufficient Measures to Protect Wells

BLM has also not adequately addressed the existence of wells at the site. Four uncapped water wells are present on or near the area where sludge application will occur. In all, there are at least 11 wells on the property, not counting monitoring wells. The presence of these wells will potentially result in the contamination of groundwater by pollutants contained in the sludge and grease and grit trap waste which BLM plans to apply to the site.

### Failure to acknowledge and account for oil & gas facilities, on-site canals, and forested areas

BLM has not sufficiently accounted for other features at the site requiring buffer zones. In several areas within the site, pad sites for oil & gas production exist with accompanying access roads. BLM has not acknowledged the unusable nature of these access roads, nor has BLM included any buffer for these access roads. Since they are impermeable surfaces, such roads should be excluded from the application areas, and buffer zones should be established around these roadways to prevent the application of waste to these roadways.

The application site has numerous drainage canals remaining from the time when the site was used for rice fields. BLM has not provided sufficient buffer zones from these canals. In some areas, BLM has proposed buffer zones that are not large enough to prevent runoff through these canals. In other cases, BLM has not recognized the presence of a canal at all.

If the permit is issued, the areas covered by oil & gas facilities, on-site canals, and forested areas should be removed from the areas where waste application is allowed, and buffer zones should be provided around these areas. By including these areas within the

total area where BLM claims it will be applying wastes, BLM has overstated the area in which waste will be applied. This, in turn, has resulted in an inflated allowance for the cumulative amount of waste that can be applied at the site.

**Conclusion**

Cumulatively, these characteristics of the site render it inappropriate for the application grease and grit trap waste, and also inappropriate for the application of sewage sludge.

Sincerely,

A handwritten signature in black ink that reads "Eric Allmon" with a long horizontal flourish extending to the right.

Eric Allmon  
Counsel for Clean Water Action,  
Texas Campaign for the Environment,  
the Texas Center for Policy Studies,  
and the Caddo Lake Institute

Phil Stephenson, Lois Kolkhorst, TCEQ,

oppose the permit application

# WQ-0004666000

**SLG**  
**86086**

Lindsey B

513 Suzanne

Edda, TX 77957

CHIEF CLERK'S OFFICE

2016 JAN 27 AM 9:12

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

*AB*

*me*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, July 29, 2015 10:23 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SLG  
86084*

**From:** [sbalentine@LNRA.org](mailto:sbalentine@LNRA.org) [mailto:[sbalentine@LNRA.org](mailto:sbalentine@LNRA.org)]  
**Sent:** Wednesday, July 29, 2015 10:09 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Sylvia Balentine

**E-MAIL:** [sbalentine@LNRA.org](mailto:sbalentine@LNRA.org)

**COMPANY:** Lavaca-Navidad River Authority

**ADDRESS:** PO BOX 429  
EDNA TX 77957-0429

**PHONE:** 3617825229

**FAX:**

**COMMENTS:** The Lavaca-Navidad River Authority(LNRA)has received calls from nearby landowners complaining about this sewage sludge land application. This propety lies just over the boundaries of the Lavaca Basin and within the Guadalupe-Lavaca Coastal Basin, so I referred the callers to GBRA, the River Authority who oversees this area. But I think that TCEQ should know about the complaints associated with this permit number WQ0004666000. Dorothy Simons owns a nearby ranch, and she claims that every time it rains the

*mu*

sludge moves via overland flow onto her property and that the smell is terrible. She says that the sludge contains needles, condoms, tampons, and other wastes. She said that the trucks delivering the sludge for land applications slosh the wastes over the local highways even though the trucks do have a cover. And now Beneficial Land Management has applied to add grease and grit trap waste to this land application permit. This does not sound like a good idea since the application activity has already generated complaints from nearby landowners. And we are concerned that the permitted land application has possibly allowed contamination of groundwater and/or the Arenosa Creek which flows into Lavaca Bay. We will appreciate your attention to this permit application. A site visit by TCEQ would be appropriate. Thank you, Sylvia Balentine, Director of Environmental Services, LNRA, Edna, TX

SLG  
86086

1/15/2016

To:  
Office of the Chief Clerk  
Texas Commission on Environmental  
Quality (TCEQ)  
Mail Code MC-105, P.O. Box 13087  
Austin, TX 78711

Please Oppose The Permit

WO-0004666000

Since grit and grease trap  
waste may contain potentially  
Hazardous substances

CHIEF CLERK'S OFFICE  
2016 JAN 20 10:05 AM '16  
COMMISSION ON ENVIRONMENTAL QUALITY  
1500 EAST BRASSER AVENUE  
AUSTIN, TEXAS 78701

Thank you  
Lawrence E. Barker  
409 Paisano  
Victoria, TX 77904

REVIEWED  
JAN 20 2016  
[Signature]

[Handwritten mark]

**SLG**  
**86086**

Chief Clerk of TCEQ,

I am writing to ask for help in stopping permissible dumping into a nearby creek.  
The permit application number is WQ-0004666000.  
What in the world are we coming to when we can let select companies dump their wastes  
into creeks that effect many other people down stream.

Please help, Karl Beahm  
1204 Taos Drive  
Victoria, TX 77904



CHIEF CLERK'S OFFICE

2014 JUN 21 AM 9:50

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

*MCC*

**Marisa Weber**

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**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, October 30, 2014 11:11 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** BLM Permit Request to TCEQ1.pdf

*SLG  
06086*

**From:** [gary@coldspringsprocessing.com](mailto:gary@coldspringsprocessing.com) [<mailto:gary@coldspringsprocessing.com>]  
**Sent:** Thursday, October 30, 2014 10:50 AM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Gary Beavers

**E-MAIL:** [gary@coldspringsprocessing.com](mailto:gary@coldspringsprocessing.com)

**COMPANY:** Cold Springs Processing

**ADDRESS:** PO BOX 1823  
FORT WORTH TX 76101-1823

**PHONE:** 8173324939

**FAX:**

**COMMENTS:** See document attached

*MW*

# COLD SPRINGS

## PROCESSING & DISPOSAL

P.O. Box 1823  
Ft. Worth, TX 76101  
1300 Cold Springs Road  
Ft. Worth, TX 76102

Phone (817) 332-4939  
Toll Free (877) 429-1325  
FAX (817) 332-2840  
[www.coldspringsprocessing.com](http://www.coldspringsprocessing.com)

October 21, 2014

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

Ref: Permit # WQ 0004666000

Dear Sirs

Beneficial Land Management received from TCEQ permission to land apply domestic sludge that has been mixed with grease trap and grit trap waste. This permission ran out in July, 2014. BLM has now submitted a permit to land apply domestic sludge with an experimental mixing of grease trap and grit trap waste to this sludge.

Was the first experimental project of this successful in proving that it is beneficial to the land besides to the financial gain for the pump company? Was the TCEQ also testing this experiment at the same time for accountability? If this is so, then change the current rules to reflect this and if not does this permit application have a different way than before to make it beneficial?

One experiment has been approved. If there are no changes to the application of waste to become beneficial then this experiment should be denied and leave the current rules as is and enforce them.

Remember that the TCEQ is there for the people of Texas to insure clean air, land, water, and the health of the public.

Sincerely



Gary Beavers  
President

# COLD SPRINGS

PROCESSING & DISPOSAL

P.O. Box 1823  
Ft. Worth, TX 76101  
1300 Cold Springs Road  
Ft. Worth, TX 76102

Phone (817) 332-4939  
Toll Free (877) 429-1325  
FAX (817) 332-2840  
www.coldspringsprocessing.com

October 21, 2014

*SLG  
8/20/14*

REVIEWED

OCT 30 2014

By *[Signature]*

CHIEF CLERKS OFFICE

2014 OCT 30 AM 9:51

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

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

Ref: Permit # WQ 0004666000

Dear Sirs

Beneficial Land Management received from TCEQ permission to land apply domestic sludge that has been mixed with grease trap and grit trap waste. This permission ran out in July, 2014. BLM has now submitted a permit to land apply domestic sludge with an experimental mixing of grease trap and grit trap waste to this sludge.

Was the first experimental project of this successful in proving that it is beneficial to the land besides to the financial gain for the pump company? Was the TCEQ also testing this experiment at the same time for accountability? If this is so, then change the current rules to reflect this and if not does this permit application have a different way than before to make it beneficial?

One experiment has been approved. If there are no changes to the application of waste to become beneficial then this experiment should be denied and leave the current rules as is and enforce them.

Remember that the TCEQ is there for the people of Texas to insure clean air, land, water, and the health of the public.

Sincerely

*Gary Beavers*

Gary Beavers  
President

*[Handwritten initials]*

**COLD SPRINGS PROCESSING & DISPOSAL**  
P.O. BOX 1823 FORT WORTH, TEXAS 76101

TX TEXAS  
DALLAS 752  
28 OCT 14  
PM 13 L

**RECEIVED**

OCT 30 2014

TCEQ MAIL CENTER  
MM

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



MAILED FROM ZIP CODE 76102  
OCT 30 AM 9:51  
CHIEF CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

78711308787

SLG  
86086

1/12/16

Office of the Chief Clerk  
Texas Commission on Environmental Quality TCEQ  
Mail Code MC-105  
P.O. Box 13089  
Austin, Tx 78711

Please oppose the permit  
application number WQ-0004668000

Margaret Beekler

Margaret Beekler  
111 Lance Lane  
Victoria Tx 77904

REVIEWED

JAN 29 2015



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2016 JAN 21 AM 10:53  
CHIEF CLERK OFFICE

McJ

SLG  
86086

State Rep Granville Morrison State  
Sen Lois Kitchin, Office of the  
Chief Clerk,

We do not want to renew permit  
WD-004666000. We do NOT WANT  
to be experimented anymore!

888 Santa Fe  
Victoria TX 77904  
Bryan Beltran

AB

CHIEF CLERKS OFFICE

7/11/71 10:00 AM

ON...  
...

me

TCEQ Public Meeting Form  
January 21, 2016

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Jonathan Berry

Mailing Address: 2411 Lone Tree Rd

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

City/State: Victoria TX Zip: 77901

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

Email: jon.e.b.86@gmail.com ✓

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

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

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

Please add me to the mailing list.

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

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

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

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

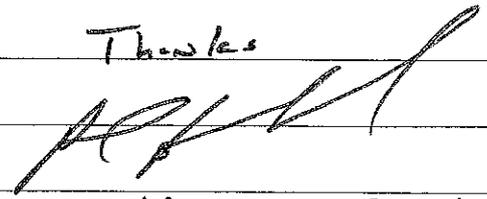
*Handwritten initials*

Office of the Chief Clerk

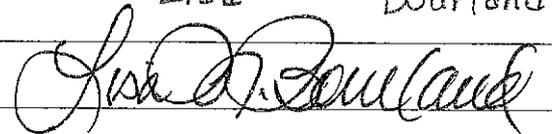
Texas Commission of Environmental Quality

Please help us stop the permitting of application  
number WQ-0004666000. we deserve clean air + water

Thanks



Lisa Bourland



206 Fenway  
Victoria TX

SLG  
86086

RECEIVED  
JUN 26 2000  
BY MA

7704  
JUN 27 AM 9:57  
OFFICE CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

(M)

Victoria TX

1-14-10

To Beannie Morrison  
Lois Kolkhorst  
Chief Clerk TCEQ.

SLG  
86086

I want you to know that I strongly  
oppose to granting permit number WQ-  
0004666000.

This landfill is way to close  
to housing developments and ranching  
properties.

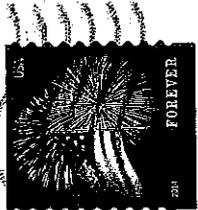
Clean air, water and land should  
stay a priority in Texas. And we count  
on our elected officials to help us  
in preserving our TEXAS.

M. Bouthillette  
401 Brocton St.  
Victoria, TX 77904

Sincerely  
my signature

Handwritten initials

Handwritten initials



SAN ANTONIO TX 78201  
RIO GRANDE DISTRICT  
15 JAN 2016 PM-4 L

2016 JAN 20 AM 10:20

Office of the Chief Clerk  
RECEIVED  
CHIEF CLERK'S OFFICE

JAN 19 2016  
POST OFFICE  
FEEC MAIL CENTER  
BC

TCEG

P.O. Box 13087

MC-10

Austin TX 78711

M. Bouthillier  
401 Brocton St.  
Victoria, TX 77904

78711-308787

POSTNET barcode

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, January 20, 2016 3:28 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** Comment on Exp Sludge Permit Ltrhd.pdf

SLG  
-----  
86086

**From:** jbragg@txfb.org [mailto:jbragg@txfb.org]  
**Sent:** Wednesday, January 20, 2016 2:13 PM  
**To:** DoNot Reply <donotreply@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Jay Bragg

**E-MAIL:** jbragg@txfb.org

**COMPANY:** Texas Farm Bureau

**ADDRESS:** PO BOX 20457  
WACO TX 76702-0457

**PHONE:** 2542928410

**FAX:**

**COMMENTS:** Comments on WQ0004666000 are attached.

MW



**RUSSELL W. BOENING**  
President

**MICHAEL WHITE**  
Vice President

**ROBERT GORDON**  
Secretary-Treasurer

**ROBERT GORDON**  
Dalhart

**DAN B. SMITH**  
Lockney

**MICHAEL WHITE**  
Vernon

**BEN F. WIBLE**  
Sherman

**MARK R. CHAMBLEE**  
Tyler

**VAL STEPHENS**  
Lamesa

**JESSICA RICHMOND**  
De Leon

**NEIL F. WALTER**  
Oglesby

**LARRY W. JOINER**  
Huntington

**RONNIE MUENNINK**  
Hondo

**BOB REED**  
Bay City

**ZACHARY X. YANTA**  
Runge

**SCOTT FRAZIER**  
Chapman Ranch

January 20, 2016

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

RE: Renewal of Land Application Permit No. WQ0004666000

To whom it may concern:

Each year municipal wastewater treatment facilities in Texas generate hundreds of thousands of tons of biosolids. These biosolids can be disposed of either in a landfill or treated in such a way that they can be safely land applied. Each disposal method poses its own set of unique challenges. These challenges are of particular concern to individuals that reside in rural areas.

Landfills are not popular in rural areas. These facilities are eyesores and generally have a large footprint. They depreciate adjoining property values; they result in more heavy truck traffic on rural roads; and there are concerns that plastic liners will not provide long-term protection for rural groundwater supplies.

As such, TFB supports programs that recycle usable wastes and biosolids to help minimize the amount of wastes placed in landfills. This should reduce the number of new landfills needed moving forward.

From an agronomic standpoint, biosolids are appealing to farmers and ranchers and can offer some benefits over commercially available fertilizers. Biosolids are nutrient rich. They contain organic matter important for improving or maintaining good soil structure, and contain many needed micro and macro nutrients that are absent in most commercially available fertilizer. The EPA and TCEQ recognize these benefits and have developed a "beneficial use" permit for the land application of biosolids.

Despite the potential benefits of land applying biosolids for agricultural production, public perception of the practice remains low. Distrust is fueled by odors that can accompany biosolids applications and several high-profile incidents that have occurred because of the application of substandard materials. We need to ensure that biosolids designated for beneficial use have an agronomic purpose and do not introduce materials that will contaminate the application areas.

Beneficial Land Management, L.L.C. has applied for the renewal of sewerage sludge land application permit number WQ0004666000. This permit also requests the continuation of an "experimental use authorization" under 30 TAC 312.3(k) to mix grease and grit trap wastes with the biosolids.

Land applying fats, oils, greases, and/or grit trap waste is not a sound practice and offer no known agronomic benefits to crops, forage or livestock. In fact, most landfills require special authorization before they will accept such wastes.

**As such, Texas Farm Bureau requests that TCEQ deny renewal of land application permit number WQ0004666000 and/or the experimental use authorization allowing the blending of greases and grit trap wastes.**

If TCEQ wishes to study the potential benefits of blending these wastes with biosolids, it should be done under controlled conditions and in collaboration with professional research staff - to ensure public safety and to preserve the integrity of the study.

Sincerely,

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

Jay Bragg

Associate Director, Commodities and Regulatory Activities

Office of the Chief Clerk

Texas Commission on Environmental Quality

Mail Code MC-105, P.O Box 13087

Austin TX 78711

**SLG**  
**86086**

I'm writing this letter to inform you of my opposition to the use of waste sludge used as fertilizer. Please oppose the permit application number WQ-004666000, Texans deserve a clean and healthy environment.

Respectfully, *Jana Breshears*



309 Dunbar Dr

Victoria, TX 77904

CHIEF CLERKS OFFICE

2016 JUN 21 11 09 AM

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



*Me*

I would like for you to oppose  
permit application number  
W0-000426000.

Caruth Brown  
0025 Country Club  
Victoria TX 77804

CHIEF CLERKS OFFICE

JUN 21 AM 10 19

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



SLG  
86086

Ma

01-15-16

Attention Office of the Chief Clerk - TCEQ

Please stop immediately permit application number WQ-0004666000. This is an ongoing issue and is hazardous to the local environment. Please put in place policies that protect our environment and resources. We all have a responsibility to make Texas free from pollution.

REVIEWED

JAN 20 2016

By AR

SLG

86086

2016 JAN 20 AM 9:51  
CHIEF CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Sincerely,

*Jeff*

Jeffrey Brown

309 Bloomingdale Circle  
Victoria, TX 77904

RC

1-14-16

Office of the Chief Clerk

SLG  
86086

Please oppose permit application

number HQ-000466600. Hit of grease

trap waste containing hazardous materials  
and Texas needs to be free of pollution.

Please protect our waterways and conserve  
natural resources by implementing  
policies to protect our environment.

TEXAS  
COMMISSION ON  
HABITAT RESTORATION  
AND PROTECTION  
2016 JAN 26 AM 10:18  
CHIEF CLERKS OFFICE

Sincerely,  
Janice Bryard

Janice

Bryard

REVIEWED

Rey

Jeff

JAN 20 2016

By [Signature]

IP # 185564 + 185565

MW



SLG  
86086

1-15-16

To TCEQ

I am writing to let you know I am against the renewal of permit application # WQ-0004666000. I live in Victoria County and have many friends who live near this area that is being used for experimental waste disposal. I am against this practice as it may pollute our waterways and pose a health risk to our community. Please, vote against this permit being renewed.

REVIEWED

JAN 20 2016

By AR

Sincerely,  
Lynette Buckler  
110 Bloomingdale Cir.  
Victoria, TX 77904

CHIEF CLERKS OFFICE

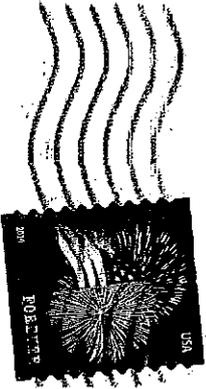
2016 JAN 20 AM 10:19

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

(21)

105 W Riverside Suite 120  
Austin, TX 78706

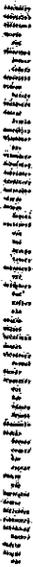
RECEIVED  
JAN 19 2016  
SAN ANTONIO, TX 78201  
RIO GRANDE DISTRICT  
16 JAN 2016 PM 3 L



Office of the Chief Clerk  
FCIQ

Mail Code MC-7055, P.O. Box 13087  
Austin, TX 78711

78711-3087



Office of the Chief Clerk  
Texas Commission on Environmental Quality (TCEQ)  
Austin Texas

I URGE YOU TO PUT A STOP TO DUMPING  
POTENTIALLY HAZARDOUS SUBSTANCES ANYWHERE  
IN OUR GREAT STATE OF TEXAS.

I REQUEST THAT YOU OPPOSE THE PERMIT  
APPLICATION NUMBER WQ-0004666000.

PLEASE DO THIS FOR THE PEOPLE THAT  
LIVE IN THESE AREAS.

SLG

86086

REVIEWED

JAN 20 1993

AL

THANK YOU

SINCERLY

LARRY BURES

608 DAVIS

EDNA TEXAS 72957

CHIEF CLERKS OFFICE

JAN 20 AM 9:55

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

me

TCEQ Public Meeting Form  
January 21, 2016

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Dr Lisa Campbell

Mailing Address: 213 Woodlands Lane

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

City/State: Victoria Tx Zip: 77904

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

Email: lcampbell@jctx.or ✓

Phone Number: 361 550 4580

- Are you here today representing a municipality, legislator, agency, or group?  Yes  No  
If yes, which one? Victoria County Public Health Dept

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

Office of the Chief Clerk  
Texas Commission on Environment Quality  
Mail Code MC-105, P.O. Box 13087  
Austin, TX 78711

**SLG**  
**86086**

Dear TCEQ,

I am writing you this letter to oppose the permit application number WQ-0004666000. Texas deserves to have a clean and healthy environment. I would like for you to implement policies that protect our waterways and conserve natural resources. Clean air, water and land matter to me so that is why I want Texas to be pollution free. Thank you for your time.

Angelica Carranco  
P.O Box 1344  
Victoria TX 77902

11/11/04



TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
CHIEF CLERK'S OFFICE  
7014 W. 21st. St. 78743



SLG  
86086

I care about this situation.

Please deny this permit application!

This is a small part we can play in  
strengthening our environment.  
WQ - 000 46660000

Trey Cole  
410 Navajo Dr.  
Victoria, 77904

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2016 JAN 26 AM 10:10

CHIEF CLERKS OFFICE

REVIEWED

JAN 20 2016

By AP

McW

SLG  
86086

Dear Office of the Chief Clerk

You should oppose the permit app. number WQ-00466600 due to potentially hazardous substances that may or may not affect our waterways. Being clean matters, so please protect our waterways.

cc Cameron Jew

812 Santa Fe

77904

Victoria tx

RECEIVED  
COMMUNICATIONS  
UNIT  
JAN 20 2013

JAN 20 9:57 AM

CHIEF CLERKS OFFICE

RECEIVED

JAN 20 2013

BY AR

CR

Office of the Chief Clerk

Texas Commission on Environmental Quality

Mail Code MC-105, P.O Box 13087

Austin TX 78711

**SLG**  
**86086**

I'm writing this letter to inform you of my oposition to the use of waste slugde used as fertilizer. Please oppose the permit application number WQ-004666000, Texans deserve a clean and healthy environment.

Respectfully,

*Garrett S* <sup>cc</sup>

309 Dunbar Dr

Victoria, TX 77904

2016 JUN 21 AM 9:56  
CHIEF CLERKS OFFICE  
COMMISSION ON ENVIRONMENTAL QUALITY

*MS*

*MS*

Office of the Chief Clerk

Texas Commission on Environmental Quality

Mail Code MC-105, P.O Box 13087

Austin TX 78711

**SLG**  
**86086**

I'm writing this letter to inform you of my opposition to the use of waste sludge used as fertilizer. Please oppose the permit application number WQ-004666000, Texans deserve a clean and healthy environment.

Respectfully,



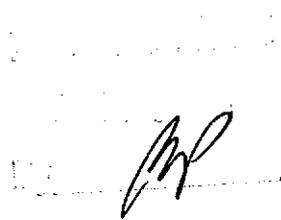
309 Dunbar Dr

Victoria, TX 77904

CHIEF CLERKS OFFICE

2014 JUN 21 AM 9:56

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY



mm

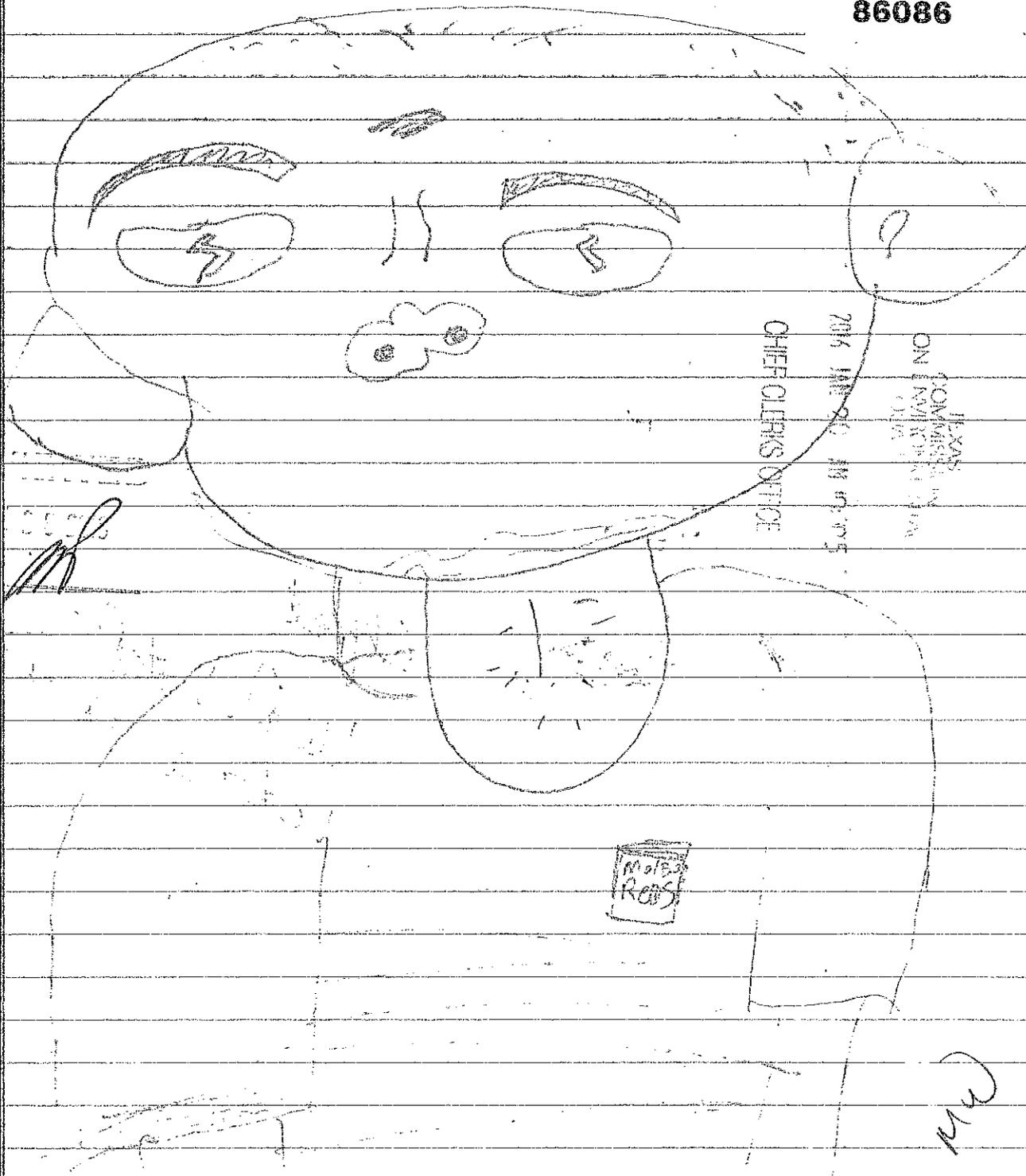
NO TO PERMIT!!!

~~10~~

Tired of seeing animals die because of  
Pollution we need clean air & water & soil  
It matters, so politicians, what you need is ready  
to speak freely with the legislature or Senate

SLG

86086



cc  
alfred

106 Rio Vista Dr  
Victoria, TX 77904

SLG  
86086

STAFF REP GRANNIE MAMSON STAFF  
SUN LMS KOLCHAK ST, OFFICE ST THE  
CHIEF CLERK,

WE DO NOT WANT TO RENEW PERMIT  
NO-00466000 WE DO NOT WANT  
TO BE EXPERIMENTED ANYMORE!

888 SANTA FE  
VICTORIA TX, 77904

CHIEF OF POLICE

CHIEF OF POLICE OFFICE

2015 JAN 26 AM 10:12

ON THE  
OFFICE

MP

MCC

SLG  
86086

STAFF REP GRANNIE MAMSON State  
SEN LMS KOLCHAK, OFFICE OF THE  
CHIEF CLERK,

We do NOT WANT to renew permit  
WQ-004606000, We do NOT WANT  
to be experimented anymore!

888 SANTA FE  
VICTORIA TX, 77904  
Janice Deadrick

CHIEF CLERKS OFFICE

216 JAN 9 11 AM 1982

RECEIVED  
NOV 10 1981  
COMMUNICATIONS  
DIVISION

*MP*

*1982*

SLG  
86086

State Rep Granville MAMSON State  
SEN LWS KILPATRICK, OFFICE STAFF  
MUT CLERK,

We do NOT WANT to renew permit  
WQ-004666000, We do NOT WANT  
to be experimented anymore!

888 SANTA FE  
VICTORIA TX, 77904  
Kenaya Deadrick

*Handwritten signature*

CHIEF CLERKS OFFICE

2016 JUN 21 AM 10:04

ON 6/21/2016

*Handwritten mark*

SLG  
86086

State Rep Granville MAMSON State  
SEN WAS WILKINSON, OFFICE OF THE  
CHIEF CLERK,

WE DO NOT WANT TO RENEW PERMIT  
WAS-004666000, WE DO NOT WANT  
TO BE EXPERIMENTED ANYMORE!

808 SANTA FE  
VICTORIA TX, 77901  
Kura Deadrick

CHIEF CLERKS OFFICE

2017 JUN 21 PM 4:58

ON THE 21st DAY OF JUNE 2017

MW

State Rep Granville Morrison State  
SEN LOS WICKHART, OFFICE ST HW  
CHIEF CLERK,

WE DO NOT WANT TO RENEW PERMIT  
WA-004666000, WE DO NOT WANT  
TO BE EXPERIMENTED ANYMORE!

808 SANTA FE  
VICTORIA TX, 77901  
Kyrre Peadrick

SLG  
86086

CHIEF CLERKS OFFICE

2016 JUN 26 PM 1:10

TEXAS  
GOVERNMENT  
ON BEHALF OF THE STATE

2016

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, October 30, 2014 3:48 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000

**From:** [ddeckerttwi@aol.com](mailto:ddeckerttwi@aol.com) [mailto:[ddeckerttwi@aol.com](mailto:ddeckerttwi@aol.com)]  
**Sent:** Thursday, October 30, 2014 12:58 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

*SLG*  
*86036*

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MR Daniel Deckert

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

**COMPANY:**

**ADDRESS:** 117 COUNTY ROAD 735  
ANGLETON TX 77515-6103

**PHONE:** 9799975636

**FAX:**

**COMMENTS:** My name is Daniel Deckert and I run my cattle on the Arenosa Creek Ranch. I support the renewal of this permit. The Mayfields have been land applying on some pastures at the Arenosa Creek Ranch for years. The pastures that have been in the program have healthier and more fertile grass than the land that has not received the sludge. That is a benefit to me and a benefit to agriculture in the state of Texas. These pastures are improved with these applications by aerating the land and cleaning up the unwanted vegetation, by allowing

*mm*

the preferred common Bermuda grass to re-establish itself. The Mayfields test their soils regularly for contaminants such as heavy metals as required by the state. According to them, they are well within the limits established by the state of Texas. They should be allowed to apply the sludge as long as they abide by the regulations set by the state. These applications allow me to graze more cattle on less acreage by improving the land.

Office of

oppose

**KENNETH G. OR SHIRLEY DIETZEL**  
**220 FENWAY**  
**VICTORIA, TX. 77904-3014**

State Rep/Geannie Morrison

**SLG**  
**86086**

Sen. Lois Kolkhorst

Office of Chief clerk TCEQ

I oppose the renewal of permit #WQ-0004666000

Kenneth G. Dietzel

CHIEF CLERKS OFFICE

2016 JAN 26 10 10 12

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY

KENNETH G. OR SHIRLEY DIETZEL  
220 FENWAY  
VICTORIA, TX. 77904-3014

SLG  
86086

State Rep/Geannie Morrison

Sen. Lois Kolkhorst

Office of Chief clerk TCEQ

I oppose the renewal of permit #WQ-0004666000

Shirley Dietzel



State Rep

Sen. Lois Kc

Office of C

opposi

Shirley:

State Rep

Sen. Lois Kc

Office of C

opposi

Shirley:

CHIEF CLERKS OFFICE

2016 JUN 22 AM 10:12

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



10

TCEQ Public Meeting Form  
January 21, 2016

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: ANDREW DOBBS

Mailing Address: 105 W. Riverside Dr. #129 Austin, TX 78704

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

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

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

Email: ~~AKA~~ DOBBS@TEXASENVIRONMENT.ORG

Phone Number: 512-326-5655

• Are you here today representing a municipality, legislator, agency, or group?  Yes  No  
If yes, which one? Texas Campaign for the Environment

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.

me

# WRITTEN TESTIMONY FORM

NAME: Douglas Donaldson

ADDRESS: 82 Cooley Rd  
Weyersville, TX 77974

PHONE: 361-491-9049

EMAIL: douglasdonaldson@gmail.com ✓

**RECEIVED**

JAN 21 2016

AT PUBLIC MEETING

**Explain your concerns with this permit:**

The first question should be why this location?  
It concerns me that the operating company, BLM, can choose it waste-dumping site based mostly on convenience (family-owned land).

MW

January 15, 2016

**SLG**  
**86086**

State Representative Geannie Morrison  
1908 N. Laurent, Suite 500  
Victoria, Texas 77901

State Senator Lois Kolkhorst  
5606 North Navarro #300X  
Victoria, Texas 77904

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

**Re: Shut down permit application # WQ-0004666000**

The dumping of this type of experimental sludge is an unacceptable practice for Victoria county and surrounding residence. This sludge waste is being dumped in our back yard and the material is potentially hazardous waste and can get in our water systems and waterways. The stench is absolutely awful and it's hard to believe this was approved.

Please implement policies that protect our water resources & waterways and most of all the health of our community. Our water is the most precious resource we have and I'm asking that you shut this down and stop this type of practice.

Regards,

Chris & Dawn Dowden  
303 Bloomingdale Circle  
Victoria, Texas 77904



CHIEF CLERK'S OFFICE

JAN 14 2016 10:09 AM

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY



**SLG**  
**86086**

**Gary Farber**

60070 Country Club  
Victoria, Tx. 77904  
Phone: 817 637 8356

▶ **Office of the Chief Clerk**

Texas Commission on Environmental Quality  
Austin, Tx. 78711



Dear \_\_\_\_\_,

We oppose anything that would hurt our environment. We feel that our waterways are becoming dumping grounds to many businesses in Texas. We wish for you to oppose the permit application number VVC-0004666000. Texas deserves a clean and healthy environment. I wish to bring up my children and grandchildren a clean and safe environment. Thank you.

Sincerely,

**Gary Farber**  
Homeowner  
1/13/2016

CHIEF CLERKS OFFICE

2016 JUN 20 AM 9:54

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



me

**SLG**  
**86086**



**Gladys Farber**

6007G Country Club  
Victoria, Tx. 77904  
Phone: 817-657-8856

► **Office of the Chief Clerk**

Texas Commission on Environmental Quality  
Austin, Tx. 78711

-----

I oppose anything that would hurt our environment. We feel that our waterways are becoming dumping grounds to many businesses in Texas. We wish for you to oppose the permit application number WQ 0004666000. Texans deserve a clean and healthy environment. I wish to bring up my children and grandchildren a clean and safe environment. Thank you.

Sincerely,



Gladys Farber  
Homeowner  
1/13/2016

CHIEF CLERK'S OFFICE

2016 JUN 21 AM 9:52

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



Dear State Officials,

Keep our state free of sludge  
dumping. Stop hazardous waste  
from happening at Arenosa Creek  
by opposing permit application  
number WQ-0004666000.

Thank you,  
Angelica Farias Farias

701 Champions Row  
Victoria Texas 77904

**SLG**  
**86086**

CHIEF OF POLICE OFFICE

2016 JAN 21 AM 10:11

STATE OF TEXAS  
DEPARTMENT OF ENVIRONMENTAL QUALITY

MR

Mu

SLG  
86086

Dear state officials,

Hi my name is Lily, and I really hope that you don't just toss this letter to the side and forget about what I'm about to say. This is a really really bad thing that you all are doing, and which makes it worse <sup>that</sup> you are doing it for money. Just to remind you what you are doing you are dumping EXperimental sludge into the Arenosa Creek ~~which~~ <sup>which</sup> disgusts me. What if you found that when you looking at the creek ~~wouldn't~~ <sup>it</sup> disgust you as well. I for once want this to stop!!!! So please make a change, and think about what you about to do before doing it. I hope you put this to concentration oppose permit application WQ-0004666000.

Thanks, ~~my~~ ♥

Lilliana Farias

701 Champions Row

CHIEF CLERK'S OFFICE

2014 JAN 22 AM 09:11

ON OFFICE

AP

114

Office of the chief clerk

Texas commissions on environmental Quality (TCEQ)  
Mail code MC-155 PO. Box 13087  
Austin TX, 78711

Concerned citizen: For health concerns  
for friends family and children. People  
in general, this creek plays an important  
role in the ecosystem as well for the  
wild life, truly sad about this, I oppose  
the application ~~WQ~~ WQ-0504666500.  
NO more CRAP.

Farrow

Brandi Farrow  
323 purpleway  
Edine TX.

Jackson County.

SLG  
86086

RECEIVED  
JUN 21 2016  
By BF

CHIEF CLERKS OFFICE

2016 JUN 21 10:00:23

NO / [unclear] / [unclear]

220 Paisano Dr.  
Victoria, B.C. V7Y90K  
Jan. 17, 2016

SLG  
86086

Off. of the Chief Clerk  
TCEQ,

I oppose the permit, application number WQ-000466000, you should oppose this permit, Texas deserve a clean and healthy environment. I surely hope you will oppose this also.

Sincerely,  
Jeannette Froehlich

REVIEWED

JAN 25 2016

BY AR

CHIEF CLERK'S OFFICE

JAN 22 AM 9:39

ONLINE  
DIGITAL

146

**F**  
Ms. Jeannette Froehlich  
220 Paisano Dr  
Victoria, TX 77904-3790



RECEIVED

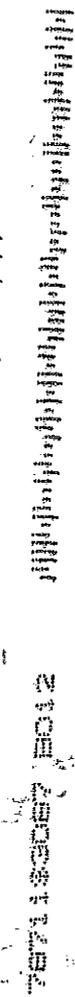
JAN 22 2016

TCEQ MAIL CENTER  
MM

2016 JAN 22 AM 9:39  
CHIEF CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

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



Dear State Rep. Geannie Morrison, Lois Kolkhorst,

We need to stop this from happening and keep Texas safe. Myself and others do not want grit and grease trap waste being experimented with our environment because it contains hazardous substances. The Permit application # WQ0004666000 does not need to be done.

Thank you Office of the Chief Clerk.

- Roxanne Fumbank  
605 Dunbar  
Victoria, TX 77904

SLG  
86086



CHIEF CLERKS OFFICE

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY

JAN 20 11 11 AM '11

Me

SLG  
86086

To chief Clerk AT TCEQ

I am opposed to Permit WQ-000 4666000  
I believe grit and grease trap waste should not  
be land applied due to its potentially hazardous  
substances

Sincerely  
Jorge Garcia  
403 Paisano Dr.  
Victoria TX 77904

COMMUNICATIONS  
DIVISION

2016 JAN 21 AM 10:15

CHIEF CLERK'S OFFICE

SEARCHED  
SERIALIZED  
INDEXED  
FILED  
BY *bl*

*mm*

22

TCEQ Public Meeting Form  
January 21, 2016

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Melissa Glassic

Mailing Address: 974 Jentry Road

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

City/State: Inez, Texas Zip: 77968

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

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

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

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

Please add me to the mailing list. ✓

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

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

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

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

MW

TCEQ Public Meeting Form  
January 21, 2016

20

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: GAYLA GOFF

Mailing Address: PO BOX 61

Physical Address (if different): 3509 Beck Rd East Tutz, TX 77918

City/State: TELFERNER Zip: 77988

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

Email: gzylteck@gmail.com

Phone Number: 361 550-7636

• 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.

mm

I OPPOSE the permit applicat. in number  
WQ-000466e000. I care about the  
environment and want to make it  
better.

SLG  
86086

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
2014 JAN 21 09:08:06  
CHIEF CLERK'S OFFICE

*AD*

Leslie <sup>Gonzales</sup> *Gonzales*

1-14-16

504 Santa Fe  
Victoria, TX 77904

*mm*

TCEQ

SLG  
86086

I do not want to have permit WQ  
0004666000 renewed. I do not want to  
be part of an experiment.

Edgar L. Hardt  
121 Northampton Circle  
Victoria, Tx 77904

RECEIVED  
MAY 23 1983  
AL

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2016 JUN 20 AM 9:43  
CHIEF CLERKS OFFICE

mm

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

January 15, 2016

**SLG**  
**86086**

Dear Representative Morrison,

Victoria citizens deserve clean and safe drinking water in their local area. Please take action to save Arenosa Creek from Experimental Sludge, which includes toxic wastes. Please oppose permit application number WQ-0004666000 from being approved for another term.

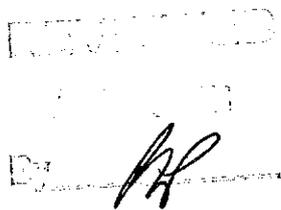
As a former employee of a chemical plant, I know how the TCEQ held the plant to a higher standard for water coming from the Guadalupe River. We had to be responsible stewards of that water in our plant and return it back to the river in the same (or better) shape than when we pulled it out of the river. The same principle should apply for our land as well. We should not be using our land as an experimental dumping ground for sludge. This permit is just north of Arenosa Creek which also is the water source to people living downstream.

Again, I ask you to oppose the renewal of application permit WQ-0004666000.

Thank you.  
Sincerely yours,



LeeAnn Hathaway  
207 Bloomingdale Circle  
Victoria, TX 77904



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2016 JAN 20 AM 9:52  
CHIEF CLERKS OFFICE



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

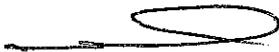
January 15, 2016

Dear Representative Morrison,

Victoria citizens deserve clean and safe drinking water in their local area. Please take action to save Arenosa Creek from Experimental Sludge, which includes toxic wastes. Please oppose permit application number WQ-0004666000 from being approved for another term.

Again, I ask you to oppose the renewal of application permit WQ-0004666000.

Thank you.  
Sincerely yours,



Michael Hathaway  
207 Bloomingdale Circle  
Victoria, TX 77904

RECEIVED  
JAN 15 2016  
BY 

**SLG**  
**86086**

2016 JAN 20 AM 9:52  
CHIEF CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



SLC

86086

Dear

Office of the Chief Clerk  
Texas Commission of Enviro. Quality (TCEQ)  
Mail Code MC-105  
P.O. Box 13087  
Austin Tx. 78711

I oppose this permit  
application number WA-0004666000

Oreta Haynes  
214 Paisano  
Victoria, TX 77904

REVIEWED

JAN 20 2016

BY

AK

CHIEF CLERKS OFFICE

2016 JAN 20 AM 9:53

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

CM

Untitled

**SLG**  
**86086**

January 14, 2016  
Janette Hernandez  
611 Dunbar Drive  
Victoria, Texas 77904



TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
2016 JAN 21 PM 04:55  
CHIEF CLERK GEORGE

Dear Office of the Chief Clerk (TCEQ),  
Please join all of the concerned people in and around Victoria Texas concerning the contaminates of grit, grease trap and mixed sewage sludge to be used as fertilizer on land near Arenosa Creek. This sounds like a recipe for disaster for plants, animals, Arenosa Creek, AND groundwater. Please oppose application # WQ-0004666000.  
All Texans deserve a clean healthy environment!

Janette Hernandez  




TCEQ Public Meeting Form  
January 21, 2016

11

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Monica Hernandez

Mailing Address: P.O. Box 155

Physical Address (if different): 168 Post Oak Pl. ✓

City/State: Inez, TX Zip: 77968

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

Email: Monica.Staff@yahoo.com ✓

Phone Number: 361-578-5970

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

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

Please add me to the mailing list.

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

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

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

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

MC

**SLG**  
**86086**

Office of the Chief Clerk  
Texas Commission on Environmental Quality,

The disposal of sewage sludge, grease trap waste, and grit trap waste by Beneficial Land Management has the ability to negatively impact the health of any nearby community. The toxic materials found in the waste pose a risk to our environment.

Please protect our land and our health by opposing the permit application number WQ-0004666000.

Sincerely,

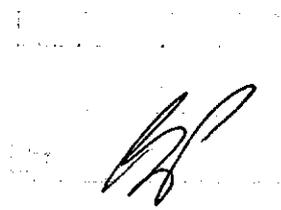


Kim Hinds  
713 Champions Row  
Victoria, Texas 77904

CHIEF CLERK'S OFFICE

2016 APR 20 AM 9:50

Texas  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY



Jan. 13, 2016

SLC  
86086

Dear Office of the Chief Clerk,

I am asking you to oppose the permit application # WQ-0004666000. It is very important for our children's futures that we take action to protect the world we live in so that they can enjoy all it has to offer later.

Thank You,  
Cynedel Hobbs

1110 TADS Dr, Victoria, TX 77901

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY

2016 JAN 20 AM 9:54

CHIEF CLERKS OFFICE

[Stamp area with illegible text and a signature]

11/21

SLG  
86086

Chief Clerk,

I am writing this letter asking you to oppose the permit application # WR-0004666000. As an avid outdoorsman I am opposed to all the dumping that might pollute our environment. Your attention to this matter is greatly appreciated. Thank you for your time and effort regarding this issue.

Sincerely,

Pat Hoelcher

JAN 20 2016

By

CHIEF CLERKS OFFICE

2016 JAN 26 AM 10:20

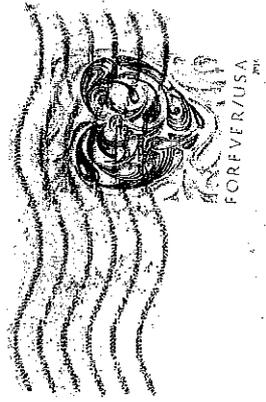
TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

my



Mr. Paul W. Hoelscher  
108 Laguna Dr  
Victoria, TX 77904

SAN ANTONIO TX 78201  
POST OFFICE DISTRICT  
35 JAN 2005 PM 11



OFFICE OF THE CHIEF CLERK

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ)

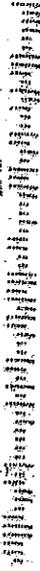
MAIL CODE MC-105, P.O. BOX 13087  
AUSTIN, TX 78711

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

RECEIVED

JAN 19 2005

TCEQ MAIL CENTER  
BC



January 15, 2016

SLG  
86086

To Whom It May Concern:

As citizens of Jackson County, we are very concerned about our environment. We are hunters and fishermen. We **do not** like a big company dumping environmental waste in, about, or around our county. We **oppose** the permit application number WQ-0004666000. We would like to see it stopped and they pay to dump legally. It seems this cannot be good for the land and water ways . I feel sure it cannot be good for the animals, birds, and fish.

Thanks for your concern in this matter. We are the citizens that end up getting hurt by this waste.

Sincerely,

Jerry & Shirley Hudson  
402 S. Trinity St.  
Edna, TX 77957  
Jackson County

RECEIVED  
JAN 21 2016  
[Signature]

CHIEF CLERKS OFFICE

2016 JAN 21 PM 09 59

TEXAS  
COMMISSION ON  
ENVIRONMENTAL QUALITY

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

mu

TCEQ Public Meeting Form  
January 21, 2016

16

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Wayne Hunt

Mailing Address: 5720 FM 234N

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

City/State: Edna Texas Zip: 77957

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

Email: w.hunt@co.jackson.tx.us ✓

Phone Number: 361-781-4960

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

If yes, which one? Jackson County Pat 1

Please add me to the mailing list. Yes ✓

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.

W

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, August 18, 2015 8:15 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000

**From:** [bhunt5@yahoo.com](mailto:bhunt5@yahoo.com) [mailto:[bhunt5@yahoo.com](mailto:bhunt5@yahoo.com)]  
**Sent:** Monday, August 17, 2015 5:57 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

SLG  
86086

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MR William W. Hunt

**E-MAIL:** [bhunt5@yahoo.com](mailto:bhunt5@yahoo.com)

**COMPANY:**

**ADDRESS:** PO BOX 14  
GANADO TX 77962-0014

**PHONE:** 3617715229

**FAX:**

**COMMENTS:** I am a landowner bordering the Beneficial Land Management, LLC site for Land Application of sewage sludge and grease and grit. I oppose the renewal of the Application and Preliminary Decision for Land Application Permit of Sewage Sludge Renewal Permit No. WQ0004666000. Due to the uncertainty of the long range effects including possible health risks and pollution of the Arenosa Creek, surrounding properties and my water wells I oppose this permit.

MW

TCEQ Public Meeting Form  
January 21, 2016

13

Nancy speaks

Beneficial Land Management, L.L.C.  
Land Application Permit of Sewage Sludge  
Renewal for Permit No. WQ0004666000

Bubba speaks

PLEASE PRINT

Name: Nancy + Bubba Ives

Mailing Address: 9579 JZ Ranch Rd

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

City/State: Inez TX Zip: 77968

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

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

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

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

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

- Please add me to the mailing list.

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

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

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

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

MW

TCEQ Public Meeting Form  
January 21, 2016

4

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Clint C. Tyeb

Mailing Address: 101 N. Bridge St. Victoria Tx 77901

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

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

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

Email: Clubs@VCTx.org ✓

Phone Number: 361-649-2068

- Are you here today representing a municipality, legislator, agency, or group?  Yes  No  
If yes, which one? Victoria County

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.

mcw

SLG  
86086

RECEIVED  
BY MR

CHIEF CLERKS OFFICE  
2016 JAN 21 AM 9  
JAN 18 2016

Dear office of Chief Clerk  
Please oppose permit  
Application No. WA 0004666000  
Protect our waterways.  
Sincerely,  
Dorothy & Frans Jahger

Dorothy & Frans Jahger  
307 Brocton St  
Victoria, TX 77904-3027

MW

**SLG**  
**86086**

RECEIVED  
2006 JAN 26 PM 4:12  
EJ *[Signature]*

CHIEF CLERKS OFFICE

2006 JAN 26 PM 4:12

ON SENATOR LOUIS  
PERMIT APPLICATION

Jan 14 2006

Dear Senator Louis  
Please oppose

Permit Application  
WQ-000465500

Protect our waterways.

Sincerely  
Dorothy S Jahger

Dorothy S Jahger  
307 Brocton St  
Victoria, TX 77904-3027

*[Faint handwritten notes]*

*[Faint handwritten notes]*

*MW*

To whom it may concern!

I oppose the use of grit and grease trap waste which is potentially hazardous to the environment and oppose the permit application number WA-0004666000. TEXANS deserve a clean and healthy environment.

Sincerely,

Sheri Jansson  
401 Woodlands Lane  
Victoria, TX 77904

SLG  
86086

EP

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
2016 JUN 20 AM 10:11  
CHIEF CLERKS OFFICE

me

**SLG**  
**86086**

Anne M. Johnson  
410 Paisano Drive  
Victoria, Texas 77904

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

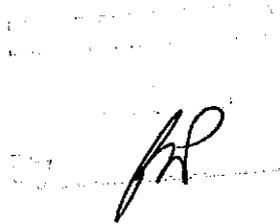
Dear Office of the Chief Clerk,

I hereby oppose permit application WQ-0004666000. I firmly believe that the mixing grit and grease trap wastes with sewage sludge on land near the Arenosa Creek is endangering the water quality of the creek.

Do not renew this permit for the sake of our water quality.

Sincerely,

  
Anne M. Johnson



CHIEF CLERK'S OFFICE

2016 JUN 21 10 01 AM '16

ON (RECEIVED) JUN 21 2016

MW

SLG  
86086

1/14/2016

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

Dear Sir,

I oppose the permit  
application number WO-0004666000.

TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
CHIEF CLERK'S OFFICE  
2016 JAN 21 AM 10:43

Sincerely,  
Barbara Z. Jones  
628 Brocton  
Victoria, TX 77904

REVIEWED  
IN 2016  
By MR

mc

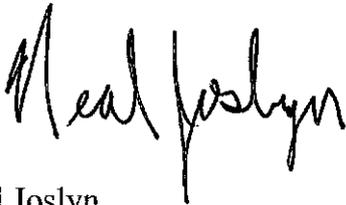
Hello, my name is Neal Joslyn and I have lived in Victoria for most of the past 57 years. I currently reside at 101 Dunbar Drive. I am a land owner and a business owner with assets in Victoria and several surrounding counties.

I have recently become aware of an issue that concerns me greatly. Evidently there is an experimental permit that has been issued to allow the dumping of a mixture of grease trap waste mixed with grit and sewage sludge onto open land near Arenosa Creek. I have seen the types of chemicals that are dumped into grease traps and I am strongly opposed to spreading this on the ground disguised as fertilizer without even checking to see what is in this potentially toxic mixture.

The current permit is up for renewal. The permit number is WQ-0004666000. I would sincerely appreciate anything you could do to help block/deny the renewal of this permit and the dangerous situation it promotes.

My wife, Ruth Joslyn, died of cancer 11 years ago. When she was a young child, she often swam in the Chesapeake Bay which was at the edge of her back yard. At that time, it was a very polluted body of water with unregulated runoff from the many acres of farmland surrounding the bay. Ruth's doctor suggested that the water could have been the cause of the cancer. Now one of Ruth's sisters has been diagnosed with cancer and is fighting for her life. Please help prevent potentially toxic substances from being dumped on the ground near water resources so my daughter, Mollye, can grow up without the risks associated with contaminated ground water.

Thank you in advance for anything you can do to help me protect my family and friends. I hope this letter can help you show others that there are concerned people here in Victoria that care about Texas and its resources.



Neal Joslyn

TEXAS  
COMMISSION ON  
ENVIRONMENT  
2006 MAR 21 PM 9:56  
CLERKS OFFICE



SLG  
**86086**



January 14, 2016

**SLG**  
**86086**

Office of the Chief Clerk TCEQ,

Please oppose the permit application number WQ-0004666000! Victoria has enough pollution as it is. We need our city and surrounding areas cleaned up and this would be a great start. Please put the lives of the people in Victoria at forefront of your agenda.

Thank you,



Nevin Kirkpatrick

609 Santa Fe Drive

Victoria, TX 77904

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
2016 JAN 20 AM 9:57  
CHIEF CLERKS OFFICE



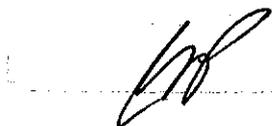
**SLG**  
**86086**

January 14, 2016

Office of the Chief Clerk TCEQ,

Please oppose the permit application number WQ-0004666000! Victoria has enough pollution as it is. We need our city and surrounding areas cleaned up and this would be a great start. Please put the lives of the people in Victoria at forefront of your agenda.

Thank you,  
  
Thomas Kirkpatrick  
  
609 Santa Fe Drive  
  
Victoria, TX 77904



TEXAS  
COMMISSION ON  
GOVERNMENT  
REFORM  
2016 JAN 20 PM 9:57  
CHIEF CLERKS OFFICE



SLG  
86086

CHIEF CLERK'S OFFICE

2016 JAN 27 AM 09:41

ON FILE

PK

Gentlemen:

Please oppose the permit application number WP-0004666000. We deserve a clean and healthy environment.

I would appreciate policies that protect our waterways and conserve natural resources. I want clean air to breathe, clean water to drink, and land free of chemicals.

Very truly yours,

Ila Knabe Ila Knabe  
6012 Country Club Dr.  
Victoria, BC V7Y 7G4

PK

January 14, 2016

SLG  
86086

To whom it may concern,

I am writing to you to ask you to oppose the permit application number WQ-0004666000 which allows the dumping of waste that contains potentially hazardous substances into our waterways. My husband and I have two young children and one on the way and are concerned that this waste is detrimental to our health and that of our children. Please help us keep Texas a beautiful state, free of pollution and with clean waterways.

Sincerely,

*Lindsey Koch*

Lindsey Koch

304 Burning Tree Street

Victoria, Texas 77904

TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
OFFICE

2016 JAN 21 AM 09 21

CHIEF CLERKS OFFICE

REVIEWED  
JAN 20 2016  
*PK*

*PK*

Hope  
LINDSEY KOCH  
304 BURNING TREE ST  
VICTORIA TX 77904-3080

USA  
FOREVER  
SAN ANTONIO TX RECEIVED  
RIO GRANDE DISTRICT  
16 JAN 2015 PM 3 JAN 19 2015  
TCEQ MAIL CENTER  
BC

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

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
2015 JAN 20 PM 2:21  
OFFICE OF THE CHIEF CLERKS OFFICE



78711-308757

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, August 11, 2015 12:46 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SIG  
86006*

**From:** jakolle@tisd.net [mailto:jakolle@tisd.net]  
**Sent:** Tuesday, August 11, 2015 12:32 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Carole Kolle

**E-MAIL:** [jakolle@tisd.net](mailto:jakolle@tisd.net)

**COMPANY:** Kolle Red Angus

**ADDRESS:** 961 N FM 444  
INEZ TX 77968-3688

**PHONE:** 3617822520

**FAX:**

**COMMENTS:** Please, please deny this permit request. It would negatively impact the land, water and residents in our area for many years to come if not FOREVER!

*mw*

TCEQ Public Meeting Form  
January 21, 2016

6  
Jim Speaks

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name:

Jim & Carole Kolle

Mailing Address:

961 N. FM 444

Physical Address (if different):

City/State:

Inez, TX

Zip:

77968

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

Email:

jakolle@tisd.net

Phone Number:

361-550-5045

• 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, August 11, 2015 12:59 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SLG  
060806*

**From:** jakolle@tisd.net [mailto:jakolle@tisd.net]  
**Sent:** Tuesday, August 11, 2015 12:49 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Jim Kolle

**E-MAIL:** [jakolle@tisd.net](mailto:jakolle@tisd.net)

**COMPANY:** Kolle Red Angus

**ADDRESS:** 961 N FM 444  
INEZ TX 77968-3688

**PHONE:** 3615505046

**FAX:**

**COMMENTS:** This permit must be denied. Dumping has been ongoing for too many years with no policing what is affecting our natural resources and our families for generation to come.

*Me*

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, August 11, 2015 11:21 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SLG  
8/11/15*

**From:** [Lacykolle@aol.com](mailto:Lacykolle@aol.com) [<mailto:Lacykolle@aol.com>]  
**Sent:** Tuesday, August 11, 2015 11:17 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MRS Lacy Kolle

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

**COMPANY:**

**ADDRESS:** 2649 J-2 RANCH RD  
INEZ TX 77968-3369

**PHONE:** 3616498521

**FAX:**

**COMMENTS:** As a resident along Arenosa Creek and member of a ranching and farming family I am concerned you are permitting a resident to dump sewage, car wash and restaurant waste along with municipal waste on +700 acres with out impermeable liners or traps and without strict supervision. This lack of concern for the environment and residents seems irresponsible and is alarming.

*MW*

TCEQ Public Meeting Form  
January 21, 2016

12

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Steve Kolly <sup>Kolle</sup>

Mailing Address: 15014 J-2

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

City/State: TWZ Zip: 72

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

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

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

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

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

Please add me to the mailing list.

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

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

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

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

MW

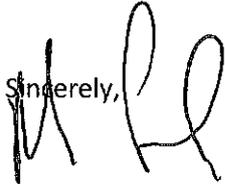


330.3(148). Under Chapter 330, grease trap waste and grit trap waste may only be disposed of in a Class 1 or class 2 landfill after being dewatered at a Type V processing facility. The Code is clear :...because of its quantity, concentration, physical or chemical characteristics, or biological properties [special waste] requires special handling and disposal to protect the human health and the environment. If improperly handled, transported, stored, processed, or disposed of or otherwise managed, [special waste] may pose a present or potential danger to the human health or the environment.”

The TCEQ’s decision to allow one company to land apply grease and grit trap waste has ramifications far beyond harming the environment. By allowing Beneficial Land Management, LLC to land apply grease and grit trap waste the Agency is giving one company an unfair advantage over the rest of the industry. All other companies have to pay tipping fees to landfills to dispose of their waste while this one company is able to dump their waste on the ground for no cost. The irony is that LES and others in the industry can’t even take grit trap waste to a Class 2 landfill because the TPH levels are above 1500. We and others in the industry take this waste to a Class 1 landfill, which has much steeper tipping fees. How can the Agency justify allowing one company to land apply the very same waste the rest of the industry disposes at a Class 1 landfill?

Liquid Environmental Solutions has been properly disposing of grease trap waste and grit trap waste in Texas since its inception in 2002. We understand that grease trap waste and grit trap waste should not be land applied. Land application of grease and grit trap waste will harm human health and the environment. The TCEQ should deny the permit application.

Thank you for the opportunity to comment on this critical issue. Please let me know if you have any questions regarding my comments.

Sincerely,  


Rich Leib  
Executive Vice President  
and General Counsel

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# 105

 Extremely Urgent

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From: (858) 481-8106  
P4ch Leeb  
Liquid Environmental Solutions  
12750 High Surf Drive  
Suite 450  
SAN DIEGO, CA 92130

Origin ID: SANA



Ship Date: 26OCT14  
ActWgt: 0.5 LB  
CAD: 1038888348NET3550

Delivery Address Bar Code



SHIP TO: (512) 238-3300  
Bridget C. Bohac, Bldg F  
TCEQ  
12100 Park 35 Circle  
AUSTIN, TX 78753

BILL SENDER

Ref # 00-012014  
Invoice #  
PO #  
Dept #

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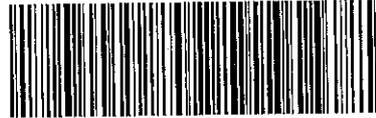
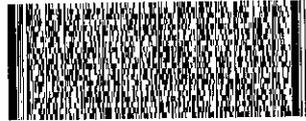
OCT 29 2014

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ON ENVIRONMENTAL  
QUALITY

Insert shipping document here.

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, October 30, 2014 8:31 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** LES LETTER opposing BLM permit application1.pdf

*SLG*  
*86006*

**From:** [rich.leib@liquidenviro.com](mailto:rich.leib@liquidenviro.com) [mailto:[rich.leib@liquidenviro.com](mailto:rich.leib@liquidenviro.com)]  
**Sent:** Tuesday, October 28, 2014 6:02 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MR Richard Leib

**E-MAIL:** [rich.leib@liquidenviro.com](mailto:rich.leib@liquidenviro.com)

**COMPANY:**

**ADDRESS:** 7651 ESTERS BLVD Suite 200  
IRVING TX 75063-4030

**PHONE:** 6199924680

**FAX:**

**COMMENTS:** Liquid Environmental Solutions opposes the allowance of grease and grit trap waste to be included in this permit. Please read the enclosed attachment.

*MW*



ENVIRONMENTAL  
SOLUTIONS

*Clean. Reliable. Innovative.*

October 28, 2014

Via electronic transmission through  
[www.tceq.state.tx.us/about/comments.html](http://www.tceq.state.tx.us/about/comments.html); and

Via Certified mail:  
Bridget C. Bohac  
Office of the Chief Clerk  
MC 105, TCEQ  
P.O. Box 13087  
Austin, TX 78711-3087

Re: AMENDED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN A BENEFICIAL  
LAND USE PERMIT RENEWAL

PERMIT NO. WQ0004666000; BENEFICIAL LAND MANAGEMENT, L.L.C.

OPPOSITION TO GRANTING OF RENEWAL WITH CHANGES OR EXTENSION OF EXPERIMENTAL  
USE LAND APPLICATION PERMIT FOR GREASE AND GRIT TRAP WASTE

Dear Ms. Bohac:

I am writing as the Executive Vice President and General Counsel for Liquid Environmental Solutions Corporation, a Texas based national company that processes and transports nonhazardous liquid waste. We are the largest hauler and processor of grease and grit trap waste in Texas with six Type V processing facilities and over 200 employees across the state. We have been in the liquid waste business in Texas for over twelve years and believe strongly that land applying grease and grit trap waste is harmful to the environment.

That is why we oppose **Permit No. WQ0004666000**. Beneficial Land Management should not be allowed to land apply grease trap or grit waste in the state of Texas. Texas law and TCEQ regulations very clearly prohibit the land application of grease and grit trap waste.

Under the Health and Safety Code Chapter 361.121 and the Texas Administrative Code Chapter 312, the only materials that may be land applied are municipal bio-solids and "sludge" resulting from the treatment of "domestic septage" and sewage. Chapter 312.8 excludes grease trap waste from the definition of "domestic septage," excludes grease and grit trap waste (and other commercial waste) from the definition of "domestic sewage," and limits "sewage sludge" to the residue from the treatment of "domestic sewage." Thus, as grease and grit trap waste are not domestic septage, not domestic sewage, and when treated do not become sewage sludge, these wastes are prohibited from land application. In fact, Chapter 312.3(l) states that Chapter 312 "does not establish requirements for the land application of...grease and grit trap waste."

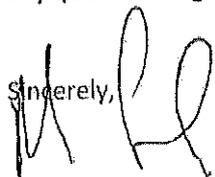
LIQUID ENVIRONMENTAL SOLUTIONS  
7651 Esters Blvd., Suite 200, Irving, TX 75063  
214-524-6050 / Customer Service 866-694-7327

330.3(148). Under Chapter 330, grease trap waste and grit trap waste may only be disposed of in a Class 1 or class 2 landfill after being dewatered at a Type V processing facility. The Code is clear :...because of its quantity, concentration, physical or chemical characteristics, or biological properties [special waste] requires special handling and disposal to protect the human health and the environment. If improperly handled, transported, stored, processed, or disposed of or otherwise managed, [special waste] may pose a present or potential danger to the human health or the environment."

The TCEQ's decision to allow one company to land apply grease and grit trap waste has ramifications far beyond harming the environment. By allowing Beneficial Land Management, LLC to land apply grease and grit trap waste the Agency is giving one company an unfair advantage over the rest of the industry. All other companies have to pay tipping fees to landfills to dispose of their waste while this one company is able to dump their waste on the ground for no cost. The irony is that LES and others in the industry can't even take grit trap waste to a Class 2 landfill because the TPH levels are above 1500. We and others in the industry take this waste to a Class 1 landfill, which has much steeper tipping fees. How can the Agency justify allowing one company to land apply the very same waste the rest of the industry disposes at a Class 1 landfill?

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Thank you for the opportunity to comment on this critical issue. Please let me know if you have any questions regarding my comments.

Sincerely,  


Rich Leib  
Executive Vice President  
and General Counsel

# WRITTEN TESTIMONY FORM

NAME: Jeremy Lopez

ADDRESS: 4405 N. Newcomb #306  
Victoria TX 77604

PHONE: 713-569-8971

EMAIL: jeremy.lopez@gmail.com ✓

Explain your concerns with this permit:

- five stock consumption
- conservation of mass says it dose not ~~depend~~
- ~~depend~~ just vanish
- water run off

**RECEIVED**

JAN 21 2016

**AT PUBLIC MEETING**

MW

RECEIVED

SLG  
86086

*MB*

OFFICE OF THE CHIEF CLERK - TCEQ

AS A FATHER OF TWO, I'M CONCERNED ABOUT THE HEALTH AND WELL BEING OF MY CHILDREN AND THEIR FUTURE CHILDREN. WE NEED POLICIES THAT PROTECT OUR WATERWAYS AND CONSERVE NATURAL RESOURCES.

GRIT AND GREASE TRAP WASTE CONTAINS POTENTIALLY HAZARDOUS SUBSTANCES. OVER TIME THIS WILL DESTROY THIS BEAUTIFUL LAND AS WELL AS HARM OUR WILDLIFE.

MAKE THE RIGHT DECISION AND OPPOSE THE PERMIT APPLICATION

WQ-0004666000.

REMEMBER LOVE CANAL.

*Brad Modigan*

BRAD MODIGAN  
311 NORTHAMPTON CIR.  
VICTORIA TX 77904.

2016 JAN 20 AM 9:41  
CHIEF CLERKS OFFICE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*MB*

**MALISH & COWAN, PLLC**

ATTORNEYS AT LAW  
A REGISTERED LIMITED LIABILITY PARTNERSHIP  
1403 WEST SIXTH STREET  
AUSTIN, TEXAS 78703  
(512) 476-8591  
FAX: (512) 477-8657  
www.malishcowan.com

CHRIS MALISH

WRITER'S EMAIL:  
cmalish@malishcowan.com

*SLG  
0608le*

October 27, 2014

Via electronic transmission through  
[www.tceq.state.tx.us/about/comments.htm](http://www.tceq.state.tx.us/about/comments.htm); and

Via Certified Mail, RRR:  
Bridget C. Bohac  
Office of the Chief Clerk  
MC 105, TCEQ  
P.O. Box 13087  
Austin, Texas 78711-3087

**REVIEWED**

**OCT 30 2014**

By *[Signature]*

CHIEF CLERK'S OFFICE

2014 OCT 30 PM 2:56

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

**Re: AMENDED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN A BENEFICIAL LAND USE PERMIT RENEWAL**

**PERMIT No. WQ0004666000; BENEFICIAL LAND MANAGEMENT, L.L.C.**

**OPPOSITION TO GRANTING OF NEW OR EXTENSION OF EXPERIMENTAL USE LAND APPLICATION PERMIT FOR GREASE AND GRIT TRAP WASTE**

Dear Ms. Bohac:

I represent Walker Aero Environmental LLC ("Walker Aero"), which owns and operates a Type V RC composting facility located in Travis County. Walker Aero has 15 employees and composts grease trap waste and sewage sludge. Walker Aero has asked me to submit its comments on Beneficial Land Management, LLC ("BLM")'s request for an experimental beneficial land use permit.

In short, BLM should not be permitted to land apply grease trap or grit trap waste because doing so directly contravenes Texas' regulations; endangers the public; and favors BLM with a commercial advantage at the cost of environmental protection.

**Grease trap waste and grit trap waste often contain contaminants and properties that make these wastes unsuitable for disposal on the land, so current rules require grease and grit trap waste to be disposed of at facilities with impermeable liners to prevent contamination of ground water.**

Grease trap and grit trap wastes are "Special Wastes," that if not handled correctly "may pose a present or potential danger to the human health or the environment."<sup>1</sup>

<sup>1</sup>See 30 Texas Administrative Code 330.3(148)

*[Handwritten signature]*

Grit trap waste contains high levels of petroleum oil and metals and can also be harmful to plants and animals. Grease trap waste usually has an acidic pH, contains food material that can attract rodents and other disease carrying vectors, contains metals at higher than background levels, and can be poisonous to plant and animal life. Both types of waste warrant the higher level of waste management, processing, and disposal required by the TCEQ.

Consequently, grease and grit trap wastes are required by TCEQ to be processed at a Type V facility, and then disposed in either a Class 1 or Class 2 landfill<sup>2</sup> (grease trap waste may also be composted under a permit). The key is that both landfills and permitted Type V composting facilities are required to have an impermeable liner under the processing facilities to make sure these pollutants cannot penetrate the water table.

Walker Aero goes to great lengths to capture and contain all leachate from its grease and sewage composting operations, because the leachate is noticeably foul and would obviously pollute the waters of the state if it were to reach them. Walker Aero cannot even imagine flinging these materials right onto the ground and allowing them to wash into the nearest well or creek, or seep into the water table, though this appears to be what BLM is doing.

**TCEQ regulations specifically prohibit the land application of grease and grit trap waste.**

Current regulations allowing land application specifically exclude grease and grit trap waste.<sup>3</sup> Land application is allowed only for certain kinds of sewage sludge, municipal bio-solids, and domestic septage; grease and grit trap waste are specifically excluded from the definitions of those materials.<sup>4</sup>

**30 TAC 312.3(k), regarding experimental sewage sludge uses, does not allow land application of grit and grease trap waste, nor can it be used to circumvent existing rules for the processing and disposal of grease and grit trap waste.**

30 TAC Chapter 312 governs the use, disposal, and transportation of sludge. Again, the chapter makes clear in its general provisions that the chapter excludes grease and grit trap waste.<sup>5</sup>

30 TAC 312.3 does not allow the experimental land application of grit and grease trap waste: §312.3 just lists exclusions to things that Chapter 312 otherwise covers. But as we already know, Chapter 312 does not apply to grease and grit trap waste, which is covered by other chapters. 30 TAC 312.3(k) allows only for an experimental program for disposing of sewage sludge. “Experimental use shall be excluded from the requirements of this chapter, provided the following conditions are met at the time the sewage sludge is placed on a beneficial use site or reclamation sit...” [Emphasis added].

Deeper in Chapter 312, §312.8(30) specifically defines “Experimental use” as “Non-routine beneficial use land application or reclamation projects where sewage sludge is added to the soil for research purposes, in pilot projects, feasibility studies, or similar projects” [emphasis added].

---

<sup>2</sup>See 30 TAC 330.5(3), 30 TAC 330.171, 30 TAC 330.173, 30 TAC 335.521(a)(1), and 30 TAC 330.331(e)  
<sup>3</sup> 30 TAC 312.3(h), (l)  
<sup>4</sup> 30 TAC 312.8 (74)(sewage sludge); municipal bio-solids, and (27)domestic septage  
<sup>5</sup> 30 TAC 312.3(h), (l)

Similarly, 30 TAC 312.8(47) specifically defines “Land application” as “The spraying or spreading of sewage sludge onto the land surface; the injection of sewage sludge below the land surface; or the incorporation of sewage sludge into the soil so that the sewage sludge can either condition the soil or fertilize crops or vegetation grown in the soil.” [Emphasis added.]

In short, careful reading of the rules in context makes it irrefutably clear that 312.3(k) allows for the testing of experimental methods for land application of sewage sludge, but **NOT** grit or grease trap waste.

The fact that prohibited materials have been commingled with the sewage sludge does not magically transform those pollutants into less toxic sewage sludge; instead, it contaminates the sewage sludge and makes the sewage sludge less appropriate for land application. Just as you cannot mix radioactive waste, toluene, asbestos, or Ebola-contaminated medical waste with sewage sludge and call the resulting mixture “sewage sludge” suitable for land application, you cannot mix grit and grease trap waste with sewage sludge and call *that* mix “sewage sludge” just so as to be able to land apply it.

The TCEQ should never have granted permission for the initial BLM “pilot program” under 30 TAC 312.3(k), and most certainly should not grant another. If this new agreement is permitted, BLM will be the only firm in Texas not required to adhere to the strict rules long in place for the handling, processing, and disposal of grease trap and grit trap waste.

**BLM has been given a competitive advantage at the cost of environmental protection.**

Walker Aero Environmental LLC disposes of grease trap waste through composting. To do so, Walker Aero must have a permit. The cost of the engineering and legal work necessary to secure that permit was in excess of \$1 million. The cost of building the impermeable composting pads and leachate detention facilities was in excess of \$2 million. Obviously, it would have been much cheaper if we could have just flung this junk onto the ground and called it good, as BLM has done. TCEQ, by allowing BLM to engage in such practices, has granted BLM a clear and unfair competitive advantage: BLM can dispose of grease and grit trap waste at a fraction of the cost incurred by others who follow the rules.

**Conclusion**

BLM should never have been granted permission to land apply grit and grease trap waste on an experimental basis. The TCEQ’s rules specifically prohibit such practices, and the “experimental use” rule allows only for the experimental land application of sewage sludge; mixing prohibited contaminants with sewage sludge to mask the fact that those pollutants are being dumped right out onto the ground cannot be countenanced. The TCEQ should cleave to its statutory mandates to protect the human health and the environment and should not allow a practice that has been prohibited by environmental agencies and experts across the country.

Thank you for the opportunity to comment on this very important issue. Please let me know if there are any questions or concerns about these thoughts.

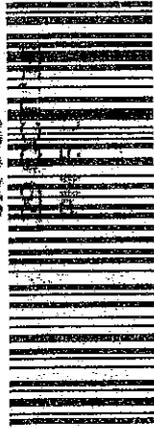
Very truly yours,

A handwritten signature in black ink, appearing to read "Chris Malish". The signature is fluid and cursive, with the first name "Chris" and last name "Malish" clearly distinguishable.

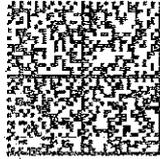
Chris Malish

Chris Malish  
Malish & Cowan  
1403 W. 6th Street  
Austin, TX 78703

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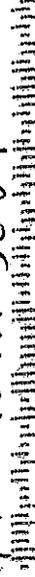
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Bridget C. Bohac  
Office of the Chief Clerk  
TCEQ, MC105  
P.O. Box 13087

Austin, TX 78711-3087

787113087



**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, October 27, 2014 1:03 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** WAEnv ltr to TCEQ 1027141.pdf

*SLG*  
*96086*

**From:** [cmalish@malishcowan.com](mailto:cmalish@malishcowan.com) [<mailto:cmalish@malishcowan.com>]  
**Sent:** Monday, October 27, 2014 12:21 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MR Chris Malish

**E-MAIL:** [cmalish@malishcowan.com](mailto:cmalish@malishcowan.com)

**COMPANY:** Malish & Cowan, PLLC

**ADDRESS:** 1403 W 6TH ST  
AUSTIN TX 78703-5105

**PHONE:** 5124768591

**FAX:**

**COMMENTS:** Please see attached. Thank you.

*CM*

**MALISH & COWAN, PLLC**

ATTORNEYS AT LAW  
A REGISTERED LIMITED LIABILITY PARTNERSHIP  
1403 WEST SIXTH STREET  
AUSTIN, TEXAS 78703  
(512) 476-8591  
FAX: (512) 477-8657  
www.malishcowan.com

CHRIS MALISH

WRITER'S EMAIL:  
cmalish@malishcowan.com

October 27, 2014

Via electronic transmission through  
[www.tceq.state.tx.us/about/comments.htm](http://www.tceq.state.tx.us/about/comments.htm); and

Via Certified Mail, RRR:  
Bridget C. Bohac  
Office of the Chief Clerk  
MC 105, TCEQ  
P.O. Box 13087  
Austin, Texas 78711-3087

**Re: AMENDED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN A  
BENEFICIAL LAND USE PERMIT RENEWAL**

**PERMIT No. WQ0004666000; BENEFICIAL LAND MANAGEMENT, L.L.C.**

**OPPOSITION TO GRANTING OF NEW OR EXTENSION OF EXPERIMENTAL USE LAND  
APPLICATION PERMIT FOR GREASE AND GRIT TRAP WASTE**

Dear Ms. Bohac:

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In short, BLM should not be permitted to land apply grease trap or grit trap waste because doing so directly contravenes Texas' regulations; endangers the public; and favors BLM with a commercial advantage at the cost of environmental protection.

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---

<sup>2</sup>See 30 TAC 330.5(3), 30 TAC 330.171, 30 TAC 330.173, 30 TAC 335.521(a)(1), and 30 TAC 330.331(e)

<sup>3</sup> 30 TAC 312.3(h), (l)

<sup>4</sup> 30 TAC 312.8 (74)(sewage sludge); municipal bio-solids, and (27)domestic septage

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**Conclusion**

BLM should never have been granted permission to land apply grit and grease trap waste on an experimental basis. The TCEQ’s rules specifically prohibit such practices, and the “experimental use” rule allows only for the experimental land application of sewage sludge; mixing prohibited contaminants with sewage sludge to mask the fact that those pollutants are being dumped right out onto the ground cannot be countenanced. The TCEQ should cleave to its statutory mandates to protect the human health and the environment and should not allow a practice that has been prohibited by environmental agencies and experts across the country.

Thank you for the opportunity to comment on this very important issue. Please let me know if there are any questions or concerns about these thoughts.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris Malish". The signature is fluid and cursive, with the first name "Chris" and last name "Malish" clearly distinguishable.

Chris Malish

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, October 30, 2014 3:48 PM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SLG*  
*@Google*

**From:** [marchbanks@hotmail.com](mailto:marchbanks@hotmail.com) [<mailto:marchbanks@hotmail.com>]  
**Sent:** Thursday, October 30, 2014 1:43 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MR Tom E. Marchbanks

**E-MAIL:** [marchbanks@hotmail.com](mailto:marchbanks@hotmail.com)

**COMPANY:** J-2 Ranch

**ADDRESS:** 535 J-2 RANCH DR  
INEZ TX 77968-3036

**PHONE:** 3615708223

**FAX:**

**COMMENTS:** I am a resident of Victoria County and live near the Arenosa Creek Ranch where Beneficial Land Management land applies their waste. I support the Mayfields' right to use their land as they see fit. I understand that they have had a certified agronomist examine the land and that there are no issues with the environment. In fact, they have operated that site for 7 years and have had no violations and no complaints, according to them. I also hear that Liquid Environmental Solutions (LES) is protesting the site, which is

*MR*

unfortunate. The TCEQ shouldn't be used to resolve competitive issues. Most of the main officers of LES live in San Diego California and this company is lobbying to make Texas more like California, and we all know how well California is doing. Californians shouldn't be able to come in and make life miserable for Texas small businesses. If LES wants to beat the Mayfields, they should do it in the marketplace. The TCEQ is there to protect the environment, not to resolve trade disputes. I understand that LES has hired Glenn Shankle to lobby against the Mayfields. They are paying him between \$25,000 and \$49,999.99 for his work (according to the Texas Ethics website lobbying reports). I wish the law prevented Californians from coming into the state and paying ex-Executive Directors from the TCEQ to work unfairly against Texas small businesses. I understand that Jeff Thompson, an employee of LES has set up an "association" of Liquid Waste Haulers. That is a sham. This association is a front for LES and nothing more and should be seen for what it is. I hope that the TCEQ respects the land rights of the Mayfields and allows Beneficial Land Management to continue to land apply its waste as it has done for the past 7 years.

Since grit & grease trap waste contains  
potentially hazardous substances  
↓ oppose the permit.

Clara Martinez  
404 Pausano  
Victoria, TX 77904

SLG  
86086

MR

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2016 JAN 21 10 01 AM '16  
CHIEF CLERKS OFFICE

CM

January 14, 2016

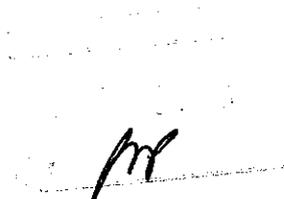
SLG  
86086

Dear Office of the Chief Clerk:

Please oppose the permit application number WQ-0004666000 so that we can have a healthy environment in our district.



Elaine Mayer  
112 Ashford Dr.  
Victoria, TX 77904



TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
2016 JAN 20 PM 04:55  
CHIEF CLERKS OFFICE



To:

State Representative Phil Stephenson

SLG  
86086

State Senator Lois Kolkhorst

Chief Clerk TCEQ

You should oppose the permit application number  
WO-0004666000 (grit and grease trap waste contains potentially  
hazardous substances).

Fred Mease

905 Buttercup

Edna, TX 77957

CHIEF CLERKS OFFICE

2006 JAN 23 AM 9:12

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

You shou

WO-000

4232000

Fred

905

Edna

TCEQ Public Meeting Form  
January 21, 2016

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Craig Monk

Mailing Address: 111 Taylor Ridge Avenue

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

City/State: Waxahatchie TX Zip: 95167

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

Email: Craigmonk@AT&T.com copy.net

Phone Number: 817 774 0460

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

If yes, which one? Evlis Louder

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

01/21/2015

Office of the Chief Clerk

TCEQ

Mail Code MC-105

PO Box 13087

Austin, Texas 77901

**RECEIVED**

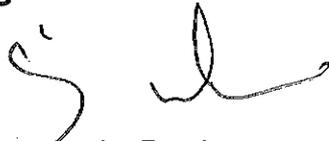
JAN 21 2016

AT PUBLIC MEETING

Written Statement for  
Permit No WQ00046660

Pages 11 plus cover

Craig Monk



craigmonk@aircanopy.net

817-714-0460



**Public Comment on PERMIT NO. WQ0004666000  
01/18/2016**

Office of the Chief Clerk,  
TCEQ,  
Mail Code MC-105,  
P.O. Box 13087  
Austin, Texas 77901

The TCEQ goes too far by knowingly allowing the injection of “benzene” into a waste water treatment plant before pretreatment and then allowing it out under any Class of sewage sludge onto farms and land without testing for it and that includes the toxicity characteristic leaching procedure (TCLP) which was designed to test for 40 chemical of over 80,000 leaching in a LAND FILL. WITH A LINER.

The TCEQ is irresponsible managing the land application of sewage sludge knowing other hazardous chemicals are in processed sewage sludge and not disclosing those to the public or farmers that use it. (re OIG Report 14-P-0363)

Non- disclosing contents of sewage sludge to farmers to satisfy buy in could be consider as fraud.

Additionally, the TCEQ voicing or writing that processed sewage sludge of any Class is “safe” without defining “safe” could also be consider consumer fraud since the known definition of “safe” is free from risk.

#### **Benzene**

Toxic, volatile, flammable liquid hydrocarbon by-product of coal distillation. It is used as an industrial solvent in paints, varnishes, lacquer thinners, gasoline, etc. Benzene causes central nervous system damage acutely and bone marrow damage chronically and is carcinogenic. It was formerly used as parasiticide.

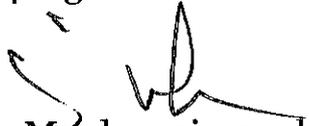
Benzene is a clear, colorless, highly flammable and volatile, liquid aromatic hydrocarbon with a gasoline-like odor. Benzene is found in crude oils and as a by-product of oil-refining processes. In industry benzene is used as a solvent, as a chemical intermediate, and is used in the synthesis of

numerous chemicals. Exposure to this substance causes neurological symptoms and affects the bone marrow causing aplastic anemia, excessive bleeding and damage to the immune system. Benzene is a known human carcinogen and is linked to an increased risk of developing lymphatic and hematopoietic cancers, acute myelogenous leukemia, as well as chronic lymphocytic leukemia.

Benzene is found in the air from emissions from burning coal and oil, gasoline service stations, and motor vehicle exhaust. Acute (short-term) inhalation exposure of humans to benzene may cause drowsiness, dizziness, headaches, as well as eye, skin, and respiratory tract irritation, and, at high levels, unconsciousness. Chronic (long-term) inhalation exposure has caused various disorders in the blood, including reduced numbers of red blood cells and aplastic anemia, in occupational settings. Reproductive effects have been reported for women exposed by inhalation to high levels, and adverse effects on the developing fetus have been observed in animal tests. Increased incidences of leukemia (cancer of the tissues that form white blood cells) have been observed in humans occupationally exposed to benzene. EPA has classified benzene as known human carcinogen for all routes of exposure.

Protected intercourse may be prudent following high exposure to benzene. As well, nursing mothers may be advised to discontinue nursing for 5 days following high exposure.

When benzene was placed on skin under closed cup it was absorbed at rate of 0.4 mg

  
Craig Monk [craigmonk@aircanopy.net](mailto:craigmonk@aircanopy.net) 817-714-0460

Ellis County

**QUESTION:** Is the TCEQ and EPA allowing, though CFR 40-part 503, chemicals of unknown amounts, concentrations and degree of hazard onto farms, ranches and forests without the consent or knowledge of those farmers, ranchers and landowners labeled as Class A, Class AB(Texas), and Class B bio-solids from any Texas Waste Water Processing Plants?

**Answer from the TCEQ:** TCEQ authorizes the land application of treated domestic sewage sludge (biosolids) that is compliant with all existing federal (40 CFR Part 503) and state regulations ( 30 TAC Chapter 312) for meeting pathogen reduction, vector attraction reduction, and pollutant limitations. TCEQ would be required to implement any changes to the existing federal biosolids regulations, including any potential EPA rule amendments in response to the OIG report. We are unaware of any EPA response addressing the validity of the statements made in the report or determination on the need for a rule amendment at this time. Sincerely,

David W. Galindo, Director

Water Quality Division

Texas Commission on Environmental Quality

---

TCEQ: Thank you for your inquiry regarding the EPA's Office of Inspector General (OIG) Report (9/29/2014) regarding the effectiveness of management controls put in place by EPA's programs to prevent and regulate hazardous chemical discharges from passing through publicly owned treatment works wastewater treatment plants. The TCEQ reviewed the OIG report when it was published. The TCEQ is implementing the National Pretreatment Program requirements as set forth in 40 CFR Part 403; however, looks forward to the memorandums, guidance, and training materials being developed by the EPA due later this year as indicated in the report.

Best Regards,  
Rebecca L. Villalba, Team Leader  
Storm water & Pretreatment Team (MC-148)  
Water Quality Division  
Texas Commission on Environmental Quality  
(voice) 512-239-4784

Below are the TCEQ - Water Quality Division's responses to the five questions you sent to us.

1. Could you please let me know what actions the TCEQ is taking about the unmonitored and unregulated hazardous chemicals that are currently being dumped on farms in Texas

without their knowledge?

TCEQ will continue to regulate the beneficial land application of biosolids in accordance with current state and federal regulations. Any future updates to federal pretreatment or biosolids regulations will be implemented by the State as required by the final EPA rule.

According to your statement below "the TCEQ **IS** implementing the National Pretreatment Program requirements as set forth in 40 CFR Part 403". "**is**". This indicates Texas has not been in compliance since October 18, 1972. (Clean Water Act)

**2. I am sure it is a typo. Is it?**

This is not a typographical error. TCEQ currently implements the National Pollutant Discharge Elimination System (NPDES) pretreatment program in accordance with federal and state regulations.

However, the condition of potentially 70,000+ industrial chemicals, hazardous or otherwise, still exists in processed sewage sludge of all three Classes being land applied to Texas Farms. As you know, none of these chemicals are tested for at WWTP so the concentrations and potential health hazards are an unknown and NO record exists of the amount of contamination that has already been applied in the past 20 years.

As you know, these sludged fields that are top applied and tiled allow for leaching and runoff of these contaminants into creek, streams and river on then out into water reserves.

As you also know, processed sewage sludge generators are not required to disclose the complex content of processed sewage sludge to farmers or end user. The results of full disclosing would limit how many farmers would take free contaminated "biosolids."

**3. Will the TCEQ be creating new language in TAC 30 rules to inform the farmers of contaminants in the "free fertilizer" so they can make an informed decision?**

TCEQ Answer: No. Rulemaking was recently completed and rule revisions to 30 TAC Chapter 312 became effective on October 2, 2014. As part of the rulemaking process, TCEQ held several stakeholder meetings and provided public notice of the draft rule statewide. The final rule was developed with consideration of stakeholder input and formal comment.

I have also attached 5 OIG reports which show an EPA trend of a lack of regulatory diligence putting the nation's health at RISK. I am certain this is not the case with the TCEQ.

**4. Is it?**

Answer: TCEQ will continue to regulate the beneficial land application of biosolids in accordance with current state and federal regulations. Any future updates to federal pretreatment or biosolids regulations will be implemented by the State as required by the final EPA rule.

I have only address chemical contamination. Pathogen testing a WWTP is also substandard and does not adequately assess health risks as seen in this report:  
<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1151840/>

**5.** Will the TCEQ be creating a moratorium to stop the systematic contamination of the State of Texas Farms or continue to allow an obvious Clean Water Act violation and putting its citizens at imminent health hazard of cancer and diseases?

**NO.** The beneficial land application of biosolids in accordance with current state and federal regulations is protective of human health and the environment, and does not violate the Clean Water Act.

Best Regards,  
Rebecca L. Villalba, Team Leader  
Stormwater & Pretreatment Team (MC-148)  
Water Quality Division  
Texas Commission on Environmental Quality  
(voice) 512-239-4784

# Office of Inspector General Reports

## Summary

1. Office of Inspector General's (OIG) Report No. 2000-P-10 **March 20, 2000**: "EPA performs few biosolids related inspections of POTW operations, virtually no inspections of land application sites, and few records inspections at POTWs or land applicators. EPA regions do not maintain data on the cumulative amounts of pollutants at land application sites, even though Part 503 requires maintaining this data. There is no regional oversight of septage land application. The biosolids program has been delegated to only three states, and there is virtually no federal oversight of state biosolids programs in non-delegated states. Therefore, EPA does not have sufficient information to determine compliance levels with the Part 503 regulatory requirements. This almost complete absence of a federal presence in the biosolids program results from the low priority given to biosolids management by EPA's Office of Water (OW), and the decision of EPA's Office of Enforcement and Compliance Assurance (OECA) not to commit enforcement resources to biosolids. This may result in increased **RISKS** to the environment and human health, and cause a loss of public confidence in the biosolids program."

2. OIG Report No. 2004-P-10 **September 28, 2004**: (You will see how well EPA has been doing in the final attached report no 14-P-0363). Preventing industrial pollutants from interfering with wastewater treatment facility operations or passing through facilities untreated into water bodies are functions of EPA's pretreatment program. It is a core part of the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. The Agency considers the pretreatment program successful in reducing discharges of harmful pollutants, and this has resulted in less resources and attention being directed toward this program in recent years. However, toxic pollutants are still being transferred to sewage treatment plants, and the impact to human health and the environment of some of these pollutants may still not be known. (The one **RISK** factor never considered by the EPA is the human condition. Following regulations costs. Regulating costs.)

3. OIG Report No. 10-P-0066 **February 17, 2010**: EPA does not have integrated procedures and measures in place to ensure that new chemicals entering commerce do not pose an unreasonable **RISK** to human health and the environment. We found that EPA's New Chemicals Program had limitations in three processes intended to identify and mitigate new **RISKS** – assessment, oversight, and transparency. The program is limited by an absence of test data and a reliance on modeling because TSCA does not require upfront testing as part of a Premanufacture Notice (PMN) submission. PMN submitters are required to submit health and safety data in their possession and a description of data known to or reasonably ascertainable by the submitter at the time of its submission. Nonetheless, the majority of PMN submissions do not include

chemical toxicity or environmental fate data. Oversight of regulatory actions designed to reduce known **RISKS** is a low priority, and the resources allocated by EPA are not commensurate with the scope of monitoring and oversight work. In addition, EPA's procedures for handling confidential business information requests are predisposed to protect industry information rather than to provide public access to health and safety studies.

4. OIG Report No. 12-P-0508 **May 25, 2012**: Since 1980, EPA has not used its RCRA authority to determine whether pharmaceuticals may qualify as hazardous waste. EPA also has not established a process for the regular identification and review of pharmaceuticals that may qualify for regulation as hazardous waste. Without a regular process, EPA cannot provide assurance that pharmaceuticals that may pose a hazardous **RISK** to human health and the environment have been identified. We identified eight chemicals found in pharmaceuticals that meet EPA's criteria for regulation as acute hazardous waste, but wastes containing these chemicals are not regulated as such. There are over 100 drugs that federal occupational safety organizations have identified as hazardous but may not have been reviewed by EPA to determine whether they may qualify as hazardous waste. EPA staff stated they have started examining these drugs for listing as hazardous waste. Further, the state of Minnesota recently noted that there has been a proliferation of pharmaceutical development since RCRA regulations were established. Our review has identified a **RISK** that there are unknown but potentially dangerous unregulated HWPs that may be unsafely disposed and released into the environment.

5. OIG Report No 14-P-0363 **September 29, 2014**: Management controls put in place by the EPA to regulate and control hazardous chemical discharges from sewage treatment plants to water resources have limited effectiveness. The EPA regulates hazardous chemical discharges to and from sewage treatment plants, but these regulations are not effective in controlling the discharge of hundreds of hazardous chemicals to surface waters such as lakes and streams. Sewage treatment plant staff do not monitor for hazardous chemicals discharged by industrial users. This is due to a general regulatory focus on the priority pollutants list that has not been updated since 1981, limited monitoring requirements, limited coordination between EPA offices, a lack of tracking hazardous waste notifications required for submittal by industrial users, or a lack of knowledge of discharges reported by industrial users under the Toxics Release Inventory. Except for EPA Region 9, sewage treatment plant permits generally include very few monitoring requirements or effluent limits, which can limit enforcement actions.

**Comment:**

If there are discharges to lakes, streams and air of hazardous chemicals then the concentrated hazardous contaminates of Bio Solids would be greater than effluent or atmospheric discharges.

# Sewage Sludge Contents / Tip of Iceberg

Heavy Metals, Pathogens, Synthetic Chemicals, Hydrocarbons, Petrochemicals & Organochlorines, Pharmaceuticals, Steroids & Hormones.

This list of contents represents only the "tip of the iceberg" of toxics concentrated in sewage sludge. Federal and most state and local land application regulations limit concentrations of only nine heavy metals and one "indicator" pathogen in land applied sewage sludge (in **BOLD**).

## Heavy Metals

Aluminum,	Dysprosium,	<b>MERCURY,</b>	Tantalum,
Antimony,	Erbium,	<b>MOLYBDENUM,</b>	Tellurium,
<b>ARSENIC,</b>	Europium,	<b>NICKEL,</b>	Terbium,
Barium,	Gadolinium,	Niobium,	Thallium
Beryllium,	Germanium,	Palladium,	Thorium,
Bismuth,	Gold,	Praseodymium,	Thulium,
Boron,	Hafnium,	Rhodium,	Tin,
Bromine,	Holmium,	Rubidium,	Titanium,
<b>CADMIUM,</b>	Iron,	Ruthenium,	Tungsten,
Cerium,	Lanthanum,	Samarium,	Uranium,
Cesium,	Lutetium,	Scandium,	Vanadium,
Chromium,	<b>LEAD,</b>	<b>SELENIUM,</b>	Yttrium,
<b>COPPER,</b>	Magnesium,	Silver,	Ytterbium,
Cobalt,	Manganese,	Strontium,	<b>ZINC</b>

## Pathogens

### Bacteria

**FECAL COLIFORM,**  
Salmonella (2,000 types),  
Shigella (4 spp.),  
E. coli 0157:H7,  
Staphylococcus aureus,

### Viruses

Adenovirus, Astrovirus,  
Calicivirus, Coronavirus,  
Enterovirus (Poliovirus),

### Protozoa

Cryptosporidium,  
Entamoeba histolytica,

### Helminths (Parasites)

Ascaris lumbricoides  
(roundworm),  
Ancylostoma duodenale  
(hookworm), Necator  
americanus (hookworm),

### Fungi

Aspergillus fumigatus,  
Candida albicans,  
Cryptococcus neoformans,

**Prions** (spongiform encephalopathy)

Enteropathogenic E. coli,  
Yersinia enterocolitica,  
Campylobacter jejuni,  
Vibrio cholera, Leptospira,  
Listeria, Helicobacter,

Coxsackie A, Coxsackie B,  
Echovirus, Enterovirus 68-  
72), Hepatitis A virus,

Giardia lamblia,  
Balantidium coli,

Tainia saginata (tapeworm),  
Trichuris (whipworm),  
Toxocara (roundworm),  
Strongyloides (threadworm),  
Ascaris suum,

Epidermophyton spp.,  
Trichophyton spp.,  
Trichosporon spp.,

Mycobacteria, Aeromonas,  
Legionella, Burkholderia,  
Endotoxins,  
antibiotic resistant bacteria,

Hepatitis E virus,  
Norwalk virus,  
Reovirus, Rotavirus

Toxoplasma gondii

Toxocara canis,  
Taenia solium,  
Hymenolepis nana

Phialophora spp.,

While Federal law and regulations limit none of contents below, they allow localities to set more restrictive limits on sewage sludge and soil contamination. Some states do so &/or permit precautionary local control, and others do neither.

Once spread on land, the contaminants above and below persist for centuries - to decades - to months affecting soil, water, plants, air, animals and people.

Unlike pesticides (distinct chemicals subject to specific analysis), sewage sludge is a very complex, variable and concentrated mixture of the vast multitude of unstudied and unregulated hazardous wastes dumped into sewer systems.

## Synthetic Chemicals

### Dioxins & Furans

Dioxins,	2,3,4,6,7,8- Hexachlorodibenzo-Furan,
Octachlorodibenzo-P-Dioxin,	1,2,3,4,7,8,9-Heptachlorodibenzo-Furan,
1,2,3,4,6,7,8-Heptachlorodibenzo-P-Dioxin,	2,3,4,7,8-Pentachlorodibenzo-Furan,
Octachlorodibenzo Furan, 1,2,3,4,6,7,8-	1,2,3,4,7,8- Hexachlorodibenzo-P-Dioxin,
Heptachlorodibenzo-	1,2,3,7,8- Pentachlorodibenzo-Furan,
Furan (71), 2,3,7,8-Tetrachlorodibenzo-Furan,	1,2,3,7,8- Pentachlorodibenzo-P-Dioxin,
1,2,3,6,7,8-Hexachlorodibenzo-P-Dioxin,	1,2,3,7,8,9- Hexachlorodibenzo-Furan,
1,2,3,4,7,8-Hexachlorodibenzo-Furan ,	2,3,7,8- Tetrachlorodibenzo-P-Dioxin,
1,2,3,7,8,9- Hexachlorodibenzo-P-Dioxin,	Polychlorinated Dibenzodioxin/Polychlorinated Di-
1,2,3,6,7,8-	benzofuran (PCDD/PCDF), Tetrahydrofuran, 2,4-
Hexachlorodibenzo-Furan,	D, 2,4,5-T, dioxin (TCDD),

### "Organics" (carbon-based)

Acetone, Chloroform,	2,2'-methylenebis[4-methyl-	N-Tetradecane,
Cyclohexanone,	6- nonyl-Phenol, p-	N-Triacontane,
Bis(2-ethylhexyl) Phthalate,	Nonylphenol, 4,4'-	N-Eicosane, N-Hexadecane,
Bis(2-ethylhexyl)	butylidenebis[2-(1,1-	N-Octacosane,
tetrabromophthalate,	dimethylethyl)-5-methyl-,	Carbon Disulfide,
Di-n-undecyl phthalate,	4-Methylphenol,	N-Decane, N-Docosane,
Alkyl benzyl Phthalate, Di-(2-	Phenol, 4,4'-(1-	N-Octadecane, P-Cymene,
Ethylhexyl) Phthalate	methylethylidene)bis[2-(1,1-	Benzo(B)fluranthene,
(DEHP), Butyl Benzyl	dimeth,	Fluoranthene,
Phthalate, Toluene,	Phenol, 4,4'-(1-	P-Chloroaniline,
2-Propanone,	methylethylidene)bis[2-(1,1-	Pyrene, Tetrachloromethane,
Methylene Chloride,	dimeth,	Trichlorofluoromethane, 2-
Hexanoic Acid,	2,4-dicumylphenol,	Hexanone,
2-Butanone, Methyl Ethyl	p-Dodecylphenol, 2,4,5-	2-Methylnaphthalene,
Ketone, Alcohol Ethoxylate,	Trichlorophenol,	4-Chloroaniline,
Alkylphenoethoxylates,	N-Hexacosane,	Benzo(a)pyrene
Phenol, Nonylphenol,	N-Tetracosane, N-Dodecane,	

### Pesticides & Insecticides

Aldrin, Chlordane,	Acetic Acid (2,4-	Pentachloronitrobenzene,
Cyclohexane, Heptachlor,	Dichlorophenoxy),	Chlorobenzilate, Beta-BHC,
Endosulfan, Endosulfan-II,	2,4,5-	Kepone, Mirex,
Lindane, Dieldrin, Endrin,	Trichlorophenoxypropionic	Methoxychlor,
DDT, DDD, DDE, 2,4,5-	Acid,	
Trichlorophenoxyacetic Acid,		

### PCBs (PolyChlorinated Biphenyls)

PCB-1016,	PCB-1232,	PCB-1248,	PCB-1260
PCB-1221,	PCB-1242,	PCB-1254,	

### PBDEs (PolyBrominated Diphenyl Ethers)

BDE-28,	BDE-85,	BDE-138,	BDE-183,
BDE-47,	BDE-99,	BDE-153,	BDE-209,
BDE-66,	BDE-100,	BDE-154,	

## Hydrocarbons, Petrochemicals, Organochlorines

PCBs, PCT, PBB, PBT,  
Anthracene,  
Pentachlorophenol,  
Benzo(g,h,i)perylene,  
Benzene, Benzene,  
C14-C24-branched,  
Polyethylbenzene  
residue, Octane,  
Hexachlorobenzene,  
Ethylbenzene,

Chlorinated Benzenes,  
Naphtha (petroleum),  
turpentine-oil,  
Hydrotreated kerosene,  
Hydrocarbon oils,  
Hydrocarbons, C10 and  
C12, Distillates  
(petroleum), Fuel oil,  
Creosols, P-Cresol, O-  
Cresol,

2-(2H-Benzotriazol-2-yl)-p-cresol,  
Hexachlorobutadiene,  
N-Nitrosodimethylamine,  
Toxaphene, Trichloroethane,  
Tetrachloroethane, Hexachloroethane,  
Carbon Tetrachloride, Dichloroethylene,  
Trichloroethylene, Tetrachloroethylene,  
Xylene,

## Pharmaceuticals

1,7-Dimethylxanthine,  
4-Epianhydrochlortetracycline,  
4-Epianhydrotetracycline,  
4-Epichlortetracycline,  
4-Epioxytetracycline,  
4-Epitetracycline,  
Acetaminophen,  
Albuterol,  
Anhydrochlortetracycline,  
Anhydrotetracycline,  
Azithromycin,  
Caffeine,  
Carbadox,  
Carbamazepine,  
Cefotaxime,  
Chlortetracycline,  
Cimetidine,  
Ciprofloxacin,  
Clarithromycin,  
Clinafloxacin,  
Cloxacillin,  
Codeine,  
Cotinine,  
Dehydronifedipine,  
Demeclocycline,  
Digoxigenin,

Digoxin,  
Diltiazem,  
Diphenhydramine,  
Doxycycline,  
Enrofloxacin,  
Erythromycin-Total,  
Flumequine,  
Fluoxetine,  
Gemfibrozil,  
Ibuprofen,  
Isochlortetracycline,  
Lincomycin,  
Lomefloxacin,  
Metformin,  
Miconazole,  
Minocycline,  
Naproxen,  
Norfloxacin,  
Norgestimate,  
Ofloxacin,  
Ormetoprim,  
Oxacillin,  
Oxolinic Acid,  
Oxytetracycline,  
Penicillin G,  
Penicillin V,

Ranitidine,  
Roxithromycin,  
Sarafloxacin,  
Sulfachloropyridazine,  
Sulfadiazine,  
Sulfadimethoxine,  
Sulfamerazine,  
Sulfamethazine,  
Sulfamethizole,  
Sulfamethoxazole,  
Sulfanilamide,  
Sulfathiazole,  
Tetracycline,  
Thiabendazole,  
Triclocarban,  
Triclosan,  
Trimethoprim,  
Tylosin,  
Virginiamycin,  
Warfarin,

## Steroids & Hormones

17 Alpha-Dihydroequilin,  
17 Alpha-Estradiol,  
17 Alpha-Ethinyl-Estradiol,  
17 Beta-Estradiol,  
Androstenedione,  
Androsterone,  
Beta Stigmastanol,  
Campesterol,  
Cholestanol,

Cholesterol,  
Coprostanol,  
Desmosterol,  
Epicoprostanol,  
Equilenin,  
Ergosterol,  
Estriol,  
Estrone,  
Ethinylestradiol,

Norethindrone,  
Norgestrel,  
Progesterone,  
Stigmaterol, Sitostanol,  
Beta-Estradiol 3-Benzoate,  
Beta-Sitosterol,  
Equilin,  
Testosterone,

"Acceptable" levels of exposure to sewage sludge contaminants are based on obsolete and faulty scientific data and processes. In 2002 and 2010, the National Academy of Sciences and National Institutes of Health established those facts [3, 1].

The risk assessments upon which these levels are based neglected dietary impacts on children; multi-pathway exposure; synergistic impacts; infectious organism exposure; ecological, wildlife, food chain, soil microorganism & forest soil impacts; long-term heavy metal accumulation; and used a cancer risk safety factor 100 times less protective than used for air and water pollution.

#### References:

1. "Reducing Environmental Cancer Risk - What We Can Do Now", President's Cancer Panel, 2008-2009 Annual Report, National Institutes of Health/National Cancer Institute, April 2010.
2. Targeted National Sewage Sludge Survey, Statistical Analysis Report, January 2009, U.S. Environmental Protection Agency, Office of Water (4301T), EPA-822-R-08-018.
3. "Biosolids Applied to Land: Advancing Standards and Practices", National Research Council, July 2002, Committee on Toxicants and Pathogens in Biosolids Applied to Land, Board on Environmental Studies and Toxicology, National Academy Press.
4. "In silico screening for unmonitored, potentially problematic high production volume (HPV) chemicals prone to sequestration in biosolids", Deo & Halden, Journal of Environmental Monitoring, July 2010, 12, Center for Environmental Biotechnology, Arizona State University.
5. "Fate of organohalogens in US wastewater treatment plants and estimated chemical releases to soils nationwide from biosolids recycling", Heidlera, et al, J. Environ. Monit., 2009, 11, 2.
6. "National Water Program Research Compendium 2009-2014", EPA 822-R-08-015, 10-30-08, US EPA, Office of Water.
7. "Organic chemicals in sewage sludges", Harrison, et al., Science of the Total Environment, 2006, 367, 481-497, Cornell Waste Management Institute, Cornell University, 6-5-06.
8. "Survey of Organic Wastewater Contaminants in Biosolids Destined for Land Application", Kinney, et al., Environmental Science & Technology, 2006, 40, 9-13-06 (American Chemical Society).
9. "Flame Retardants: Persistent Pollutants in Land-Applied Sludges", Hale, et al., Nature, 412, 12, July 2001, Department of Environmental Science, Virginia Institute of Marine Science.
10. "Land Application of Sewage Sludges", 1998 CU Recommends From: 1998 Cornell Recommends for Integrated Field Crop management; A Cornell Cooperative Extension Publication, C.U.N.Y.
11. "Fate of Pathogens During the Sewage Sludge Treatment Process & After Land Application", J. Smith Jr: Senior Environmental Engineer - EPA Center for Environmental Research Information, Cinn, Ohio, & J.B. Farrel, Consultant, Cinn, Ohio (1998).
12. "Dioxins and furans in sewage sludges: A review... significance... agricultural...", Jones et al., Critical Reviews Environ. Sci. & Tech., 27, 1, January 1997, Lancaster University, U.K.
13. "Biosolids & Sludge Management", Krogman, et. al., Rutgers U. Coop. Ext., Solid Waste Management, Dep't. of Environmental Sciences, N.J., Water Environment Research, 69, 4, 6-97.
14. EPA "Technical Support Document for the Round Two Sewage Sludge Pollutants", EPA-822-R-96-003, August 1996.
15. "Pathogen risk assessment methodology for municipal sewage sludge landfilling and surface disposal", U.S. EPA, 1995, EPA 600/R-95/016.
16. NSSS USEPA 1988 "National Sewage Sludge Survey Availability of Information & Data, and Anticipated Impacts on Proposed Regulations; Proposed Rule"; Fed Reg, vol. 55, # 218, 11-9-90, pgs 47210-47283, Table I-12.
17. "Land Application of Wastewater Sludge", Younos, American Society of Civil Engineers, 1987, Chapters 1 (Intro) & 7 ("The Health Effects of Land Application of Sludge").
18. "National Survey of Elements & Other Constituents in Municipal Sewage Sludges", R. Mumma, et. al. Arch. of Environ. Contam. Toxicol. vol 13, 1, 1984.

**SLG**  
**86086**

01/13/16

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

TEXAS  
COMMISSION ON  
ENVIRONMENTAL QUALITY  
CHIEF CLERK'S OFFICE  
2016 JAN 21 PM 9:58

*[Handwritten initials]*

Dear TCEQ,

Please oppose the permit application number WQ-0004666000. This permit allows companies to dump grit and grease trap waste that contains potentially hazardous material into the ground near Victoria.

Please implement policies that will protect our waterways and conserve natural resources. Texans deserve a clean and healthy environment. Clean air, water and land are important to us and future generations.

Shelly Murphy

*[Handwritten signature of Shelly Murphy]*

Shelly Murphy

405 Woodlands Ln  
Victoria, TX 77904

*[Handwritten initials]*

Dear Office of the Chief Clerk,

I am a Victoria Citizen who is opposed to the dumping of waste that contains potentially hazardous substances. We need to save our land, water, & air for our future generations.

LeAnn O'Hara  
205 Dunbar  
Victoria, 77204

SLG  
86086

RECEIVED  
JAN 20 2003  
BY AL

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
JAN 20 AM 9:55  
CHIEF CLERK'S OFFICE

192

**Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, October 30, 2014 8:30 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** Opposition to Beneficial Land Management Permit1.docx

**From:** [leo@wastewaterts.com](mailto:leo@wastewaterts.com) [<mailto:leo@wastewaterts.com>]  
**Sent:** Wednesday, October 29, 2014 4:44 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

*SLG  
8/6/09/16*

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Leo Ounanian, JR

**E-MAIL:** [leo@wastewaterts.com](mailto:leo@wastewaterts.com)

**COMPANY:** Wastewater Residuals Management LLC

**ADDRESS:** 10217 WALLISVILLE RD  
HOUSTON TX 77013-4115

**PHONE:** 7138287136

**FAX:**

**COMMENTS:** See letter attached

*Mu*

I oppose the sledge dumping at arena creek.  
please halt any contract renewall. -

Brian Padron  
1601 John Stockbauer  
Victoria Tx 77901

**SLG**  
**86086**

HP

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2016 JUN 20 AM 9:53  
CHIEF CLERKS OFFICE

mm

Office of the Chief Clerk,

We oppose application # WA-0004666000

Please help us to conserve + protect our natural resources + waterways!

Thank you!

Daniel Pollard

**SLG**  
**86086**

319 North Hampton Cir

Victoria TX 77904

MP

CHIEF CLERK'S OFFICE

2016 JAN 21 AM 10:15

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

22

Office of the Chief Clerk,

Please oppose application # WA-0004666000

Please help to conserve & protect our  
natural resources & waterways!

Thank you!

Gabriel Pallau

319 Northhampton Cir  
Victoria TX 77904

**SLG**  
**86086**

SEARCHED  
SERIALIZED  
INDEXED  
FILED  
MAR 21 2016  
FBI - TAMU

CHIEF CLERKS OFFICE

2016 MAR 21 AM 10:15

TEXAS  
COMMISSION  
ON ENVIRONMENT  
AND NATURAL RESOURCES

mm

105 W Riverside Dr Suite 180  
Austin, TX 78704

SAN ANTONIO TX 782  
RIO GRANDE DISTRICT  
15 JAN 2016 PM 4 1

RECEIVED

JAN 19 2016

TCO MAIL CENTER  
BC

CHIEF OF POLICE OFFICE

2016 JAN 26 AM 10:14

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



Office of the Chief Clerk  
Mail Code <sup>TEC</sup> MA-105, P.O. Box 13084  
Austin, TX 78741

787413333

POSTNET barcode

Office of the Chief Clerk,

Please oppose Application # ~~10~~ WQ-0004666000

Please help conserve + protect our natural resources.

Thank you!

Meg Pallant

319 North Hampton Cir  
Victoria TX  
77904

**SLG**  
**86086**

RECEIVED  
JUN 20 11 19 21  
AR

TEXAS  
GOVERNMENT  
ON BEHALF OF THE  
COMMISSIONERS  
2016 JUN 20 AM 10:21  
CHIEF CLERKS OFFICE

MW

**SLG**  
**86086**

1005 Taos

Victoria, Tx 77979

January 13, 2016

Office of the Chief Clerk

TCEQ MC-105

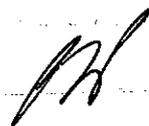
PO Box 13087

Austin, Tx 78711

CHIEF CLERKS OFFICE

2016 JAN 21 AM 9:54

TEXAS  
COMPTROLLER  
OF PUBLIC ACCOUNTS  
OFFICE



Sir or Madam:

Please implement polices to protect Arenosa creek and its groundwater. Please oppose the permit WQ-000466600.

Sincerely,

Ted Patterson

*Mc*

State officials, St. Rep. G. Morrison, St. Sen. Lois Kelchner  
TCEQ - office of Chief Clerk  
Marilyn Payne  
206 Navajo Dr.

Victoria, TX 77904

I oppose the permit application #  
WQ-0004666000.

SLG  
86086

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
2016 JAN 20 AM 10:19  
CHIEF CLERKS OFFICE

APD

MCC

TO: STATE OFFICIALS CONCERNED ABOUT  
DISTRIBUTION OF WASTE SLUDGE SPREAD  
ON PRISTINE PASTURES POLLUTING <sup>THE</sup> GROUND  
AIR, & WATER THIS IS ILLEGAL & IMMORAL  
AND MUST BE STOPPED! I OPPOSE  
THE PERMIT APPLICATION # WG-000 4666 000.

DO YOUR DUTY & STOP THIS  
DANGEROUS PRACTICE,

Tommy D. Payne  
206 AVASO DR.  
VICTORIA, TX 77904

SLG  
86086

CHIEF CLERK'S OFFICE

2016 JAN 21 AM 9:09

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

RP

RP

TCEQ Public Meeting Form  
January 21, 2016

(17)  
Randy speaks

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name:

Randy & Susan Prichard

Mailing Address:

P.O. Box 546

Physical Address (if different):

City/State:

Inez, TX

Zip:

77968

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

Email:

rlpser v@yahoo.com

Phone Number:

• Are you here today representing a municipality, legislator, agency, or group?

Yes

No

If yes, which one?

Please add me to the mailing list.

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

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

(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

January 15, 2016

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

SLG  
86086

Dear: To Whom It May Concern:

I am writing to say I oppose  
the permit application number:

WP-0004666000. We, Texans deserve  
a clean and healthy <sup>now</sup> for ourselves  
and our generations to come. Texas  
deserves the best! Since grit and grease  
trap waste contains potentially hazard-  
ous substances, that is not good for  
Texas. Please, keep Texas free from  
pollution of this kind.

CHIEF CLERKS OFFICE

JAN 20 9:43 AM '16

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

REVIEWED

JAN 20 2016

By

Sincerely,

Lanna Primm

MW



TCEQ Public Meeting Form  
January 21, 2016

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Gilbert Ramon

Mailing Address: 781 Garcitas Creek Road

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

City/State: Tx 77 Zip: 77968

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

Email: Gilbert Ramon 1@Hotmail.com ✓

Phone Number: 361-648-9336

- 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

**SLG**  
**86086**

January 14, 2016

Office of the Chief Clerk TCEQ,

Please oppose the permit application number WQ-0004666000! Victoria has enough pollution as it is. We need our city and surrounding areas cleaned up and this would be a great start. Please put the lives of the people in Victoria at forefront of your agenda.

Thank you,

Amber Rehm

609 Santa Fe Drive

Victoria, TX 77904



CHIEF CLERKS OFFICE

2016 JAN 20 AM 9:57

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



5603 Country Club Dr.  
Victoria, TX 77904

SLG  
86086

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

Re: Permit number  
WQ0004666000

Dear Sir;

Please oppose this permit because since grit  
and grease trap waste contains potentially hazardous  
substances.

Please implement policies that protect our  
waterways and conserve natural resources.  
We all deserve clean air, water and land.

Thank you,  
Joyce Ritchey

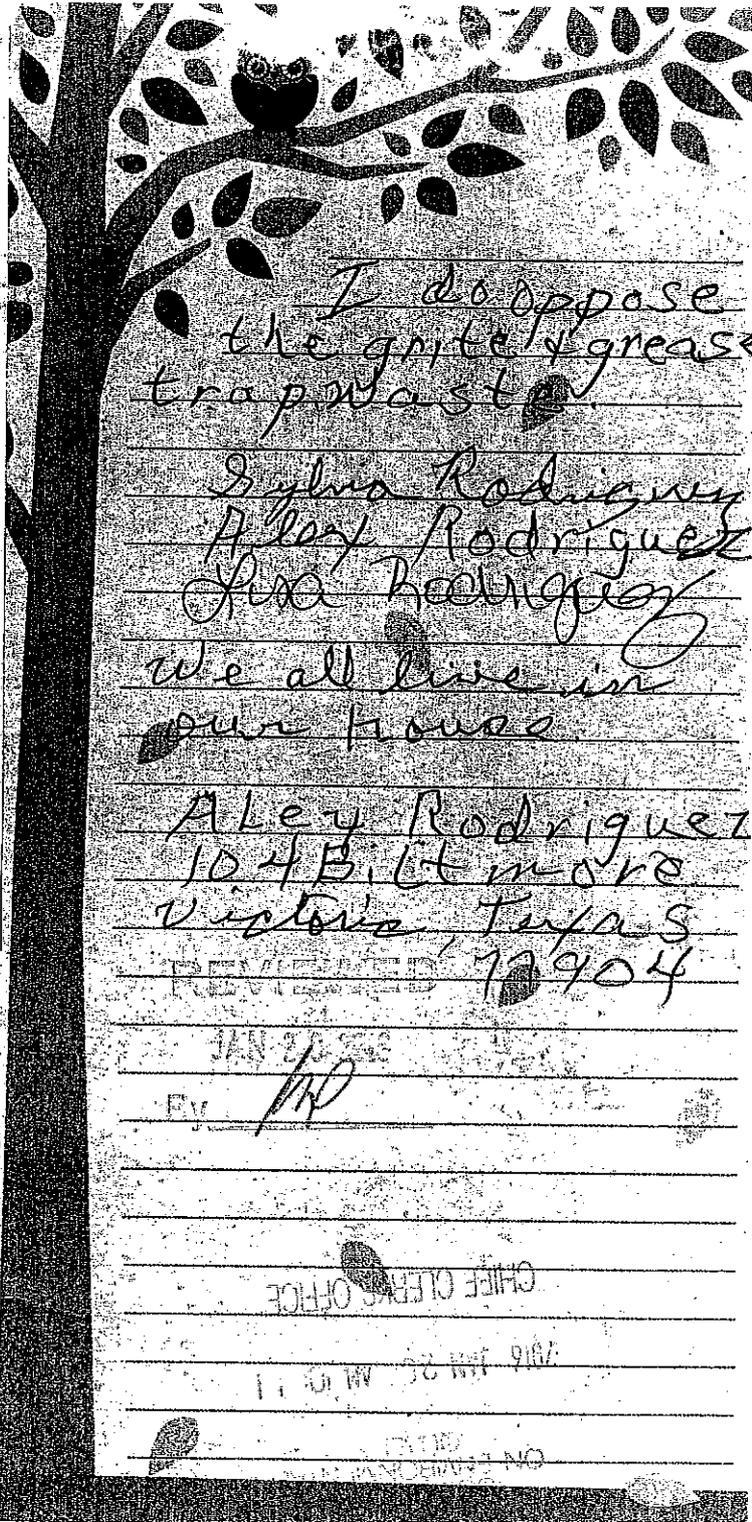


CHIEF CLERK'S OFFICE

JAN 20 1978

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Mc



I do oppose  
the greasy grease  
trap waste

Sylvia Rodriguez  
Aley Rodriguez  
Lisa Rodriguez

We all live in  
our houses

Aley Rodriguez  
104 Biltmore  
Victoria, Texas  
77904

CHIEF CLERKS OFFICE

JAN 20 11 10 AM '97

ON FILE NO

mu

Office of the Chief Clerk

This is my personal letter  
to state that I am  
opposed to the renewal  
of Permit WQ 000466000  
Please take my concerns into  
consideration

Rodriguez  
Edward Garcia Rodriguez  
401 S. Pumpfrey  
EDNA, TX 77957

SLG  
86086

*SL*

CHIEF CLERKS OFFICE

JUN 21 AM 10 23

TEXAS  
ON LINE

*me*

SLG  
86086

RECEIVED  
JAN 20 2016  
BY HR

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2016 JAN 20 AM 9:53

CHIEF CLERKS OFFICE

office of the Chief Clerk TCEQ

I oppose the permit application

# WQ 000466000

Thank you

Emilio Rodriguez

311 Bloomingdale cir

Victoria tx 77904

MU

oppose the permit application number  
WA-0004666000

Harry Sanders Sanders

*Handwritten signature*

514 Santa Fe Dr.  
Victoria, TX 77904

**SLG**  
**86086**

*Handwritten initials*

CHIEF CLERKS OFFICE

2014 JUN 21 09:49:26

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY

*Handwritten initials*

January 13, 2016

**SLG**  
**86086**

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



I would like to add my voice to the people that are asking you to oppose the permit application number WQ-000466600. This permit would be for the dumping of grit and grease in the Arenosa Creek area.

Texans deserve a clean and healthy environment.

Thank you for your consideration.

*Linda Seerden*  
Linda Seerden

811 Champions Row  
Victoria, Texas 77904

TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
CHIEF CLERKS OFFICE  
2016 JAN 20 AM 9:59

*me*



Page Two: Letter to Mr. John Bentley, Director of the Take Care of Texas Program,  
Texas Commission on environmental Quality.

While there are laws to prevent these discharges to land, some people are doing it with  
flagrant disregard for the law. Grease and grit trap waste is classified as special waste.

So, I thought I would seek your comments and advice on whether allowing "special" and  
toxic waste to be land applied is "Taking Care of Texas". By law, special waste is to be  
landfilled or recycled. I'm sure one may argue that land application of grease and grit trap  
is recycling. Well not so, if grease and grit waste were to be land applied without sludge  
there would be no beneficial or end use, just contamination. In fact, there would be even  
more harm and contamination to the environment and human health that mixing it with  
sludge causes. Grease and grit trap waste has no recycle benefit or no nutrient beneficial  
redeeming qualities. Taxpayers and fee payers have had to pay millions to clean up sham  
recycler's mess. This practice is unlawful and should be stopped, however, TCEQ's  
Water Quality division continues to support this unlawful practice by accepting and  
processing the amended grease and grit trap land application.

I'm not asking for an immediate response from you, but I do hope that you do monitor  
this activity as it percolates through the agency for your own assessment of whether this  
practice "Takes Care of Texas" and comports with law. I think it is obvious the  
conviction I have regarding this matter. I love beef, but I hope I'm never unfortunate to  
have consumed or consume beef products that have derived from beef livestock that has  
grazed in a field where grease and grit trap waste has been applied.

I will be glad to discuss this matter with you at anytime you feel necessary.

I thank you for your time in reading my letter and your devotion to this Great state.

And, May God Bless Texas.

Sincerely,

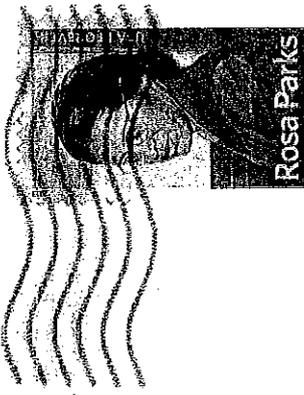


Glenn W. Shankle  
Shankle & Associates  
2105 Haas Lane  
Austin, Texas 78728  
PH: 512-415-1331  
Email: [gshankle@austin.rr.com](mailto:gshankle@austin.rr.com)

CC: ~~Bridget Bohac~~, Chief Clerk, Texas Commission on Environmental Quality  
Mr. David Galindo, Director, Texas Commission on Water Quality Division  
Mr. Earl Lott, Director, Municipal Solid Waste Division

SHANKLE & ASSOCIATES  
2105 HAAS LANE  
AUSTIN, TEXAS 78728

AUSTIN TX 787  
RIO GRANDE DISTRICT  
06 NOV 2014 PM 5 L



105  
RECEIVED

NOV 07 2014  
TCEC MAIL CENTER

The Honorable Bridget C. Bohac  
Chief Clerk  
Office of The Chief Clerk  
Texas Commission on Environmental Quality  
State of Texas  
P.O. Box 13087  
Austin, Texas 78711-3087

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 NOV -7 AM 10:39  
CHIEF CLERK'S OFFICE

78711308767



SHANKLE & ASSOCIATES

2105 HAAS LANE  
AUSTIN, TEXAS 78728

RECEIVED

COMM 41953

44948  
Exec  
Richard  
Pennington

October 23, 2014 ASSIGNED TO: DW/OLS

SLG  
86006

OCT 28 2014

10-4-14

The Honorable Richard Hyde, P.E.  
Executive Director  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

DUE DATE:

OCT 24 2014

RE: BLM Land Applying Grease and Grit Trap Waste

Dear Richard:

I learned years ago at a management training at the Hubert H. Humphrey Management Institute that when a person asks to see their superior that the first thing they approach the superior with is not the main reason they actually wanted to visit.

With that being said, let me first say that as a former Executive Director of the Texas Commission on Environmental Quality (TCEQ), I know first hand the responsibility and challenges that are associated with the job. And, I have observed the challenges of other executive directors. While executive director of the TCEQ, you were a valuable asset for me in confronting many challenges including working with EPA on air quality and resolving air quality issues in Dallas and Houston, especially the issue in Milby Park. I can name many others. I say this to say that of all the executive directors, I can't think of any crisis we have had to deal with that rises to the level of the crisis that you have to deal with regarding Ebola. I know this situation has been very time consuming on your part and the state is fortunate to have you overseeing this matter.

Understanding the time and the magnitude you have had to spend on this crisis I have been very sensitive to following up on the matter regarding the Beneficial Land Management (BLM) issue. However, the more I look into the matter, I find that the agency is on a course that could cause damage to the state, the people of the state and cause unintended consequences for the agency.

I'm told that even though the so called experimental agreement that let BLM unlawfully land apply grease and grit trap waste has expired, the TCEQ continues to allow BLM to land apply under the interpretation by the agency that nothing in the agreement precludes BLM from continuing to this activity. I disagree. The "Agreement" clearly states that it terminates three years from the respondent's date of signature.

2014 OCT 28 AM 11:29  
CHIEF CLERK'S OFFICE  
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

2014 OCT 29 AM 11:29  
CHIEF CLERK'S OFFICE  
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

REVIEWED

10/10/2014

*[Signature]*

*[Handwritten mark]*

**Page Two: Letter to Richard Hyde Regarding BLM Land Applying Grease and Grit trap Waste. October 23, 2014**

However, TCEQ staff says that it is not explicitly implied. Well, that is somewhat akin to your and my driver's license that has an expiration date.

The license does not explicitly imply that you cannot drive after expiration, but you and I know that it is unlawful to drive with an expired license, just as it is for BLM to continue to apply grease and grit trap waste with an expired/terminated authorization. Now, one of your lawyers may argue that in some code there's language that says one cannot drive a motor vehicle on public streets with an expired drivers license. However, I challenge staff to show me any code, rule or law that says one can land apply grease and grit trap waste. Staff contends that 30 TAC 312.3 (k) allows this experimental trial for grease and grit trap waste. Not true, 312.3 (k) only applies to sludge.

Grease and grit trap waste is special waste according to code and must be disposed in a Class I landfill. But, regardless the agency has done nothing to BLM to enforce the illegal dumping /land applying of grease and grit trap waste without authorization.

More disturbing, I was recently informed by agency staff that TCEQ is definitely considering allowing this practice to continue in the issuance of BLM's renewal permit.

I will not bore you with all the initial dynamics that lead the agency to take this action and I understand that it is the lawyer's responsibility to protect the executive director and the agency, but sometimes it's just best to ask for forgiveness when one fails to ask the legislature for permission.

Please know that I really hate to belabor things, especially with respect to you and your true-to-form values, and it is not my intention to get into a letter war. However, this matter is so significant to law and TCEQ's regulatory responsibilities that I feel compelled to bring it back to your attention.

Respectfully,



Glenn W. Shankle  
Shankle & Associates  
2105 Haas Lane  
Austin, Texas 78728  
PH: 512-415-1331  
Email: gshankle@austin.rr.com

SHANKLE & ASSOCIATES

2105 HAAS LANE  
AUSTIN, TEXAS 78728

October 12, 2014

Ms. Deirdre Sheppard  
Team Leader  
Applications Review and Processing Team  
Water Quality Division  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

REVIEWED

OCT 15 2014

By AK

CHIEF CLERKS OFFICE

2014 OCT 15 AM 10:00

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

RE: **Public Information Act Request**, Regarding an Amended  
Declaration of Administrative Completeness, Applicant Name:  
Beneficial Land Management, L.L.C (CN6000919591)  
Sludge Permit No. WQ0004666000  
Site Name: Arenosa Creek Ranch BLU Site (RN103911889)

SLG  
86086

Dear Ms. Sheppard:

On October 11, 2014 I received a copy of a letter from you to a Mr. Carter Mayfield informing Mr. Mayfield that the executive director has declared the above referenced application received on December 5, 2011, administratively complete on January 24, 2013. The letter addressed to The copy of the letter I received I received has a date of **September 30, 2014**, eight months later. Based on my knowledge of this matter and that fact that I know you, I'm going to assume this letter came from the Texas Commission on Environmental Quality (TCEQ). I make an assumption because the letter was not sent on TCEQ's letterhead. My copy was on plain paper. Please see attached. But, that is something I will explore later.

Pursuant to the Public Information Act, I ask that you provide me with a copy of the Administrative Complete Application referenced above. I ask that the copy be sent to me by hard copy in the mail.

Your response to this request is appreciated. You may contact me at the contact information provide below for additional information.

Sincerely,



Glenn W. Shankle  
Shankle & Associates  
2105 Haas Lane  
Austin, Texas 78728

Attachment:  
CC: Mr. David Galindo  
Ms. Bridget Bohac  
Mr. Robert Martinez



September 30, 2014

Mr. Carter Mayfield  
Beneficial Land Management, L.L.C.  
P.O. Box 6870  
San Antonio, Texas 78209

RE: Amended Declaration of Administrative Completeness  
Applicant Name: Beneficial Land Management, L.L.C. (CN600919591)  
Sludge Permit No.: WQ0004666000  
Site Name: Arenosa Creek Ranch Sludge BLU Site (RN103911889)  
Type of Authorization: Renewal

Dear Mr. Mayfield:

The executive director has declared the above referenced application, received on December 5, 2011, administratively complete on January 24, 2013.

You are now required to publish notice of your proposed activity and make a copy of the application available for public review. The following items are included to help you meet the regulatory requirements associated with this notice:

- Instructions for Public Notice
- Notice for Newspaper Publication
- Public Notice Verification Form
- Publisher's Affidavits

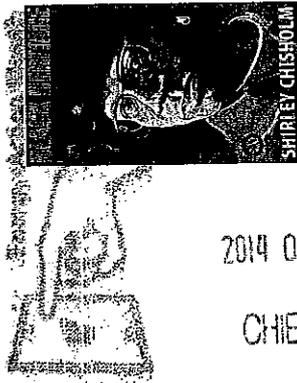
You must follow all the directions in the enclosed instructions. The most common mistakes are the unauthorized changing of notice, wording, or font. If you fail to follow these instructions, you may be required to republish the notices.

The following requirements are also described in the enclosed instructions. However, due to their importance, they are highlighted here as well.

1. Publish the enclosed notice within **30 calendar days** after your application is declared administratively complete. (See this letter's first paragraph for the declaration date.) **You may be required to publish the notice in more than one newspaper, including a newspaper published in an alternative language, to satisfy all of the notice requirements.**

SHANKLE & ASSOCIATES  
2105 HAAS LANE  
AUSTIN, TEXAS 78728

AUSTIN TX 787  
OCT 2014 PH21



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 OCT 15 AM 10:00  
CHIEF CLERKS OFFICE

The Honorable Bridget C. Bohac  
Chief Clerk  
Office of The Chief Clerk  
Texas Commission on Environmental Quality  
State of Texas  
P.O. Box 13087  
Austin, Texas 78711-3087

RECEIVED  
OCT 15 2014  
TCEQ MAIL CENTER  
BC

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7871308787

SHANKLE & ASSOCIATES

2105 HAAS LANE  
AUSTIN, TEXAS 78728

October 11, 2014

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

REVIEWED

OCT 13 2014

SLG  
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CHIEF CLERK'S OFFICE

2014 OCT 13 PM 2:29

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Re: Comments on Beneficial Land Use Permit Amended Renewal Sludge  
Application. PERMIT NO. WQ0004666000

Dear Ms. Bohac:

I have recently received an amended notice of application from TCEQ that Beneficial Land Management (BLM) has added land application of grease and grit trap waste to their renewal permit application. It is deceptive to refer to this application as a renewal because it implies that the permit conditions are not changing, when in reality, the proposed change would be a significant amendment to the permit. Referring to this proposed action as a renewal implies that it is a standard renewal without changes. The method that is being used in this process is misleading to the public.

The history of land application of waste at the BLM site is very long and involves several years of unauthorized land application of grease and grit trap waste. In 2011, the TCEQ and BLM reached an "Agreement" which appeared to allow for the land application activities of grease and grit trap waste to continue until July 6, 2014 and required certain testing and reporting to be done by BLM. In December 2011, BLM applied to the TCEQ for a renewal of their permit which was set to expire on May 31, 2012 and which only authorizes land application of sewage sludge. Now they have requested that the land application of grease and grit trap waste be newly authorized in that renewal. If this were a typical renewal, it would have been issued already.

However, the problem with adding grease and grit trap waste to the land application permit, is that it is not authorized by statute or rule. The statutory authority for permitting land application of waste is provided in Health & Safety Code §361.121. This authorization is limited to Class B sludge and the statute specifically prohibits the TCEQ from expanding the definition of Class B sludge to make it less stringent. Class B sludge does not include grease and grit trap waste, therefore TCEQ has no legislative authority to permit the land application of grease and grit trap waste or any mixture containing it.

**Page Two: Comment letter to Ms. Bridget Bohac regarding Beneficial Land Management Amended Renewal Sludge Application. Application No. WQ0004666000**

The notice refers to 30 Texas Administrative Code §312.3(k) as the purported authority for justification of the renewal permit language. In addition to the lack of legislative authority for such an interpretation, there are several reasons why that section does not provide the needed authority.

First, and most obvious, is that §312.3(k) is limited by its own language to apply to the application of “sewage sludge.” By definition, in §312.8, sewage sludge is the “solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in treatment works.” And domestic sewage is “Waste and wastewater from humans or household operations that is discharged to a wastewater collection system or otherwise enters a treatment works.” This does not include grease or grit trap waste. Clearly the language of §312.3(k) was meant to provide authority for experimentation with land application of sewage sludge, nothing else.

To make matters more clear, the next provision of the rule, §312.3(l) states “This chapter does not establish requirements for the land application of chemical toilet waste, grease and grit trap waste, milk solids, or similar non-hazardous municipal or industrial solid wastes.” There is no language to say “Except as provided in subsection (k)” which might imply otherwise. The agency cannot use the criteria in 312.3(k) for authorizing land application of any of the wastes excluded in 312.3(l), or for that matter, any of the other wastes excluded in the subsection including hazardous waste and industrial waste.

In fact, grease and grit trap waste are classified as a “special waste” under §330.3(148) because they “require special handling and disposal to protect the human health or the environment. If improperly handled, transported, stored, processed, or disposed of or otherwise managed, it may pose a present or potential danger to the human health or the environment.” As such, a landfill has to be specifically authorized to accept grease or grit trap waste in order to dispose of it. In the TCEQ’s regulatory guidance document on Special Waste (RG-29), the agency makes it clear that these wastes have limited disposal options:

Grease-trap waste must be transported to an authorized facility which can be a processing or treatment facility, a liquid waste transfer station, or an MSW landfill. Grease-trap waste may also be processed on-site by mobile treatment or processing units.

Grit-trap waste must be transported to an authorized facility which can be a processing or treatment facility, a liquid waste transfer station, or an MSW landfill. Grit-trap waste may also be processed on-site by mobile treatment or processing units.

**Page Three: Comment letter to Ms. Bridget Bohac regarding Beneficial Land Management Amended Renewal Sludge Application. Application No. WQ0004666000**

While domestic septage:

Is regulated under 330 in the same manner as grease- and grit- trap waste but is also subject to Chapter 312 under 30 TAC if used beneficially as land applying.

According to this TCEQ document, land application is not an option for grease and grit trap waste.

Even if §312.3(k) could authorize the land application of grit and grease trap waste, it would not be appropriate to add the conditions to a permit. This section of the rule has to do with experimental uses, not permanent uses. An experimental use should have an end date and provide information that is previously not known. In this case, the "Agreement" between TCEQ and BLM to allow for the land application between 2011 and 2014 had an expiration date. It contemplated a comparison of land application techniques and provided sampling data to the TCEQ. While this data did not show any benefit to adding grease and grit trap waste to sludge, it did provide years of data to the agency. There is no new data needed and no purpose in further experimentation. If the TCEQ has looked at the data provided by BLM since it started land applying grease and grit trap waste seven years ago and has found that it represents a beneficial use, the next step is for TCEQ to write rules to set out appropriate criteria. Otherwise, without rules, such a permit provision is unlawful.

Beneficial Land Management does not consider the land application of grease and grit trap waste an experiment, they consider it a business model. It is the centerpiece of their operation. They have been using the technique since the first year of their permit issuance (without disclosure to TCEQ) and have never stopped. They are currently operating outside of any authority as the "Agreement" has expired and the permit amendment is still pending. Until TCEQ takes some action, they will continue. This "experiment" is over and it is time that the practice is stopped.

Sincerely,



Glenn Shankle  
Shankle & Associates  
2105 Haas Lane  
Austin, Texas 78728  
(512) 251-4212 (fax)  
(512) 415-1331 (cell)

SHANKLE & ASSOCIATES  
2105 HAAS LANE  
AUSTIN, TEXAS 78728

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AUSTIN TX 787  
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RECEIVED

OCT 13 2014

TCEQ MAIL CENTER  
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The Honorable Bridget C. Bohac  
Chief Clerk  
Texas Commission on Environmental Quality  
State of Texas  
P.O. Box 13087  
Austin, Texas 78711-3087

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2014 OCT 13 PM 2:29

CHIEF CLERK'S OFFICE

78711308787

TCEQ Public Meeting Form  
January 21, 2016

Beneficial Land Management, L.L.C.  
Land Application Permit of Sewage Sludge  
Renewal for Permit No. WQ0004666000

PLEASE PRINT

Name: Clinton Shefcik

Mailing Address: P.O. Box 842

Physical Address (if different): 485 CR 277 ✓

City/State: EDNA TX Zip: 77857

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

Email: ClintonShefcik@live.com ✓

Phone Number: 361-782-1258

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

If yes, which one? JACKSON COUNTY FARM BUREAU

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

**Greg and Diane Sheguit**

**SLG**  
**86086**

**505 Elizabeth St.**

**Edna, TX 77957**

January 15, 2016

To whom it may concern,

My husband and I are opposed to renewing the license to dump sledge and grease trap wastes on the property in Victoria County located within the watershed of the Arenosa Creek. This Creek is currently on the 303D list of impaired watersheds. This property with it's proximity to the Arenosa Creek will not enable this creek to be de-listed and with it's sandy easily erosive soils will be a threat to it's water quality.

Thank you for your consideration in this matter,

*Diane Sheguit*      *Greg Sheguit*

Diane and Greg Sheguit

CHIEF CLERK'S OFFICE

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COMMISSION  
ON ENVIRONMENTAL  
QUALITY

JAN 21 10 19

*RR*

*MW*

Office of the Chief Clerk  
Texas Commission on Environmental Quality (TCEQ)

**SLG**  
**86086**

Hello, I am writing to you today about a news report about an experiment going on near Victoria. This experiment of fertilizer consisting of waste from grease traps, grit from car wash traps and sewage sludge are being spread on land near Arenosa Creek. I am concerned with this so called fertilizer having heavy metals and other contaminants contaminating our ground and fresh water resources. Please do not renew this WQ 0004666000 or any permit that allows any experiment to possibly contaminate our water resources. I heard about some towns in the Midwest with contaminated water. I sure do not want to have that happen here, especially for an experiment. Without good drinking water we have no life. So stop this now. Thank you for your help.

*Dora Silva*  
Dora Silva  
810 Santa Fe  
Victoria, Texas 77904

*MS*

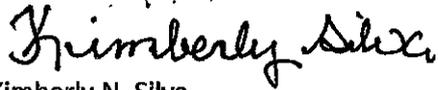
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ON ENVIRONMENTAL  
QUALITY  
2008 JUN 23 09 02 AM  
CHIEF CLERKS OFFICE

*MS*

Office of the Chief Clerk  
Texas Commission on Environmental Quality (TCEQ)

SLG  
**86086**

Hello, I am writing to you today about a news report about an experiment going on near Victoria. This experiment of fertilizer consisting of waste form grease traps, grit from car wash traps and sewage sludge are being spread on land near Arenosa Creek. I am concerned with this so called fertilizer having heavy metals and other contaminates contaminating our ground and fresh water resources. Please do not renew this WQ 0004666000 or any permit that allows any experiment to possibly contaminate our water resources. I heard about some towns in the Midwest with contaminated water. I sure do not want to have that happen here, especially for an experiment. Without good drinking water we have no life. So stop this now. Thank you for your help.



Kimberly N. Silva  
810 Santa Fe  
Victoria, Texas 77904



CHIEF CLERK'S OFFICE

2016 JUN 23 04 09 50

TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY



Office of the Chief Clerk  
Texas Commission on Environmental Quality (TCEQ)

**SLG**  
**86086**

Hello, I am writing to you today about a news report about an experiment going on near Victoria. This experiment of fertilizer consisting of waste form grease traps, grit from car wash traps and sewage sludge are being spread on land near Arenosa Creek. I am concerned with this so called fertilizer having heavy metals and other contaminates contaminating our ground and fresh water resources. Please do not renew this WQ 0004666000 or any permit that allows any experiment to possibly contaminate our water resources. I heard about some towns in the Midwest with contaminated water. I sure do not want to have that happen here, especially for an experiment. Without good drinking water we have no life. So stop this now. Thank you for your help.

*Kimberly Silva*  
Kimberly N. Silva  
810 Santa Fe  
Victoria, Texas 77904

*RP*

CHIEF CLERKS OFFICE

2016 JUN 20 PM 0:55

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

*mu*

Office of the Chief Clerk  
Texas Commission on Environmental Quality (TCEQ)

**SLG**  
**86086**

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Silvano Silva Jr  
810 Santa Fe  
Victoria, Texas 77904  
361-648-4350  
nunos0123@yahoo.com



CHIEF CLERKS OFFICE

2016 JUN 21 AM 9:55

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



TCEQ Public Meeting Form  
January 21, 2016

Beneficial Land Management, L.L.C.  
Land Application Permit of Sewage Sludge  
Renewal for Permit No. WQ0004666000

PLEASE PRINT

Name: Dennis Simons

Mailing Address: 115 W. Main

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

City/State: Edna, TX Zip: 77957

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

Email: d.simons@co.jackson.tx.us ✓

Phone Number: 361-782-2352

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

If yes, which one? Jackson County

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.

MSW

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, September 28, 2015 2:33 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** TCEQ Resolution1.pdf

*SLG  
860816*

**From:** [d.simons@co.jackson.tx.us](mailto:d.simons@co.jackson.tx.us) [mailto:[d.simons@co.jackson.tx.us](mailto:d.simons@co.jackson.tx.us)]  
**Sent:** Monday, September 28, 2015 1:54 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Dennis Simons (*see attachment*)

**E-MAIL:** [d.simons@co.jackson.tx.us](mailto:d.simons@co.jackson.tx.us)

**COMPANY:** Jackson County, Texas

**ADDRESS:** 115 W MAIN ST Room 207  
EDNA TX 77957-2700

**PHONE:** 3617822352

**FAX:**

**COMMENTS:** Please see attachment.

*MW*

IN THE COMMISSIONERS COURT  
OF  
JACKSON COUNTY, TEXAS

**RESOLUTION IN OPPOSITION TO THE LAND APPLICATION  
PERMIT OF SEWAGE SLUDGE RENEWAL BY  
BENEFICIAL LAND MANAGEMENT, L.L.C.,  
PERMIT NO. WQ0004666000**

**WHEREAS**, Jackson County, a subdivision of the State of Texas, is charged with both the responsibility and the statutory authority to protect the health, safety and welfare of the citizens of Jackson County, Texas and their property interest; and

**WHEREAS**, the disposal of sewage sludge and the disposal of grease trap waste and grit trap waste are activities that have high potential to negatively impact the health, safety and welfare of any community; and

**WHEREAS**, the disposal of sewage sludge and the disposal of grease trap waste and grit trap waste may negatively influence property values; and

**WHEREAS**, Jackson County believes that the disposal of such wastes in the manner proposed by Beneficial Land Management, L.L.C., in Victoria County constitutes an unacceptable risk and threat to the public health, safety and welfare of the citizens of Jackson County, Texas; and

**WHEREAS**, grease trap waste and grit trap waste contains toxic materials from commercial sources unlike sewage sludge from humans and households; and

**WHEREAS**, the disposal of sewage sludge containing grease trap waste and grit trap waste has the potential to escape into the air and/or waterways, including subsurface waterways, posing significant threats to the public health, safety and welfare; and

**WHEREAS**, Jackson and Victoria Counties share a common boundary along the Arenosa Creek in the vicinity of the proposed permit site; and

**WHEREAS**, the nature of the soils of Jackson and Victoria Counties is such that it would allow the migration of waste and hazardous materials to contaminate water resources by runoff into surface water, including by not limited to Arenosa Creek, and/or leach into the groundwater; and

**WHEREAS**, the potential contamination of Jackson County's water resources poses a significant threat to the public health, safety and welfare of the citizens as they rely on these resources for drinking water, and

**WHEREAS**, the proposed waste may include heavy metals and other contaminants and such substances present a threat to the public health, safety and welfare, including the potential to contribute to the impairments of water quality in Arenosa Creek, Lavaca Bay and the Matagorda Basin.

**THEREFORE, BE IT RESOLVED**, that Jackson County, Texas opposes the sewage sludge land application renewal request by Beneficial Land Management, L.L.C., including the request for experimental use authorization to authorize land application of sewage sludge mixed with grease and grit trap waste, and

**FURTHER, BE IT RESOLVED**, that Jackson County, Texas shall submit this resolution and additional written comments to the Texas Commission on Environmental Quality opposing Beneficial Land Management, L.L.C.'s, sewage sludge land application renewal request for Permit No. WQ0004666000.

Read and Adopted this 28<sup>th</sup> day of September, 2015, by a vote of 5 ayes and 0 nays.



Dennis Simons, County Judge

Wayne Hunt  
Wayne Hunt, Commissioner, Pct. 1

IP # 184820

Wayne Bubela  
Wayne Bubela, Commissioner, Pct. 2

IP # 184831 Jonny Belicek  
Jonny Belicek, Commissioner, Pct. 3

Dennis Karl ] IP # 184830  
Dennis Karl, Commissioner, Pct. 4

ATTEST:

Barbara Williams  
Barbara Williams, County Clerk

FILED September 28, 2015 @ 1:24pm  
BARBARA WILLIAMS-Clerk of County Court  
Jackson County, Texas  
BY [Signature]

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, August 24, 2015 8:31 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SLG  
86006*

**From:** [cowgirl7a30@aol.com](mailto:cowgirl7a30@aol.com) [<mailto:cowgirl7a30@aol.com>]  
**Sent:** Saturday, August 22, 2015 12:17 PM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MS Loine A. Simons

**E-MAIL:** [cowgirl7a30@aol.com](mailto:cowgirl7a30@aol.com)

**COMPANY:**

**ADDRESS:** 505 SUZANNE ST  
EDNA TX 77957-3242

**PHONE:** 3617828437

**FAX:**

**COMMENTS:** I oppose the Permit No. WQ0004666000 for Notice of Application and Preliminary Decision for Land Application Permit of Sewage Sludge Renewal for the Beneficial Land Management, LCC. My family has owned an adjoining ranch to the land application site since 1942. My family has been native residents of Jackson County since 1824. I believe sewage treatment plants should not be in the fertilizer business. My ranch is separated from the land application site by the Arenosa Creek. The Arenosa Creek is a natural drain that

*Mu*

makes its way to the Lavaca Bay. This creek floods and waters from runoff flow on my land at times. I am concerned about the groundwater. Citizens have been given filtered information as to what exactly is in sludge, grease and grit. There is limited knowledge and limited testing to prove that this is an acceptable practice. Toxic build-up of heavy metals which are in this material can cause serious disease. Application of sewage sludge and grease and grit should not be put on this area as it is close to the creek. There is very little information known about how this practice may affect human health as well as livestock and wildlife health. I feel there are not enough resources to regulate this activity. Mr. Mayfield owns the sewage treatment facility, the land and the trucking company. Can he do as he pleases? It appears that it is all for his financial gain. How can the property owners beside this Land Application site be protected? Are our property values going to plummet? Do we have to live in fear of toxic groundwater and airborne pathogens? The smell is nauseating. I have been diagnosed with cancer. My brother died of cancer. Is this problem related to the close proximity to this site? This permit needs to be rejected and land application needs to be stopped near the creek. Please oppose this permit.

72904

810 TRAS Victoria TX

F Shane Smalley  
OPPOSE the permit  
application number  
WQ-000466000

JAN 20 2016

By AS

CHIEF CLERKS OFFICE

JAN 20 2016

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

CM

**MELISSA R. SMITH**

207 Woodlands Ln.,  
Victoria, TX 77904

**SLG**  
**86086**

**January 13, 2016**

RECEIVED  
JAN 13 2016  
[Handwritten initials]

**Dear Recipient:**

Please oppose permit application number WQ-0004666000. This is a potentially hazardous substance, and Texans deserve a clean and healthy environment.

Sincerely,



**Melissa R. Smith**

TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY  
2016 JAN 26 AM 9:54  
CHIEF CLERKS OFFICE

[Handwritten initials]

SLG  
86086

TO WHOM IT MAY CONCERN,

IT HAS BEEN BROUGHT TO OUR ATTENTION  
THAT OUR ENVIRONMENT HERE ~~IS~~ IN THE GREAT STATE  
OF TEXAS IS IN DANGER. I'VE LIVED HERE MY WHOLE LIFE  
I WILL DIE HERE. MY FAMILY AND I CAN'T IMAGINE LIVING  
ANYWHERE ELSE. I HAVE 3 SMALL CHILDREN. PLEASE DO NOT  
ALLOW ANY COMPANY OR ORGANIZATIONS TO DESTROY OUR BEAUTIFUL  
COUNTRY SIDE. I WANT MY CHILDREN, AND THEIR CHILDREN TO  
BE PROUD OF THIS BEAUTIFUL STATE WE HAVE. WE ASK THAT YOU  
OPPOSE PERMIT APPLICATION WQ-0004441000. PLEASE USE  
YOUR INFLUENCE TO PROTECT OUR WATERWAYS, AND HELP CONSERVE  
OUR NATURAL RESOURCES. WE DESERVE THAT.

CHIEF DENIS OFFICE

2017 JUN 20 10 09 AM

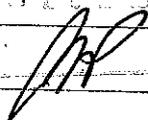
TEXAS  
ON BEHALF OF  
THE STATE

THANK YOU FOR YOUR TIME,

Julian Sosa

104 Rio Vista

Victoria, TX 77904



TCEQ Public Meeting Form  
January 21, 2016

**Beneficial Land Management, L.L.C.**  
**Land Application Permit of Sewage Sludge**  
**Renewal for Permit No. WQ0004666000**

PLEASE PRINT

Name: Shelley Srp

Mailing Address: 407 Dennis St.

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

City/State: Edna, Tx Zip: 77957

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

Email: Shelleyalee@yahoo.com ✓

Phone Number: 361-782-6414

- 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.

*on back*

I am opposed to permit # W2000 & 666000-

**RECEIVED**

JAN 21 2016

**AT PUBLIC MEETING**

mm

January 15, 2016

SLG  
86086

RECEIVED

JAN 20 2016

By MP

CHIEF CLERK'S OFFICE

2016 JAN 20 AM 9:57

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

To Whom It May Concern:

I am a 5<sup>th</sup> generation Jackson Countian. My family has been swimming in the creeks and bays in our area since 1829. I now have three children of my own who swim in those waterways. I ask you to please oppose the permit application number WQ-0004666000. Grease and grit trap wastes contain potentially hazardous substances and should NOT be allowed. I also ask you to please implement policies that protect our waterways and conserve our natural resources, so that all of the generations after us can enjoy these resources as we do.

Sincerely,

Shelley Srp  
407 Dennis St.  
Edna, Tx 77957

*Handwritten signatures and initials: Srp, m, Srp, m, Srp*

*Handwritten signature: Srp*

*Large handwritten scribble or signature*

*Handwritten scribble*

*Handwritten initials: MS*

407 Dennis  
Edna, Tx 7957



SAN ANTONIO TX 782  
RIO GRANDE DISTRICT  
16 JAN 2016 PM 3 L

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JAN 19 2016

MAIL CENTER

Office of The Chief Clerk  
Texas Commission on Environmental Quality

Mail Code MC-105

P.O. Box 13087

Austin, Tx 78711

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2016 JAN 20 AM 9:56  
CHIEF CLERK OFFICE



78711-308787

**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, August 12, 2015 8:42 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SLG  
8/6/15*

**From:** [Shelleyalee@yahoo.com](mailto:Shelleyalee@yahoo.com) [<mailto:Shelleyalee@yahoo.com>]  
**Sent:** Wednesday, August 12, 2015 7:32 AM  
**To:** DoNot Reply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Shelley Srp

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

**COMPANY:**

**ADDRESS:** 407 DENNIS ST  
EDNA TX 77957-3213

**PHONE:** 3617826414

**FAX:**

**COMMENTS:** I am a citizen in this community. I am strongly against the current permit and do not want to see the approval of any additional permits.

*MW*

Steve St. Jean  
625 Brocton St.  
Victoria, Texas  
January 14, 2016

SLG  
86086

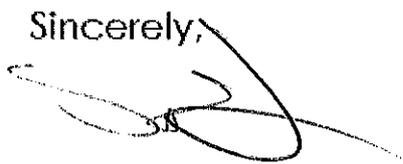
Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Mail Code MC-105  
P.O. Box 13087  
Austin, Texas 78711

CHIEF CLERK'S OFFICE  
2016 JAN 14 10 09 AM  
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Dear Office of the Chief Clerk:

I am writing to express my concern regarding permit application number WQ-0004666000. I would like to encourage you to oppose the permit application due to the potentially hazardous substances found in grit and grease trap waste. Please help implement policies that protect our waterways and help conserve natural resources.

Sincerely,



Steve St. Jean



**SLG**  
**86086**

Yasmina St. Jean  
625 Brocton St.  
Victoria, Texas  
January 14, 2016

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

CHIEF CLERK'S OFFICE

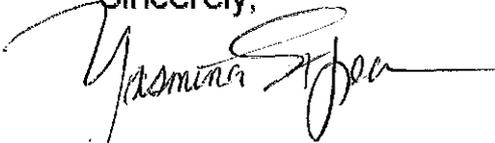
JAN 14 2016 10 09 AM

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY  
MC-105

Dear Office of the Chief Clerk:

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Sincerely,



Yasmina St. Jean



19

# TCEQ Public Meeting Form January 21, 2016

## Beneficial Land Management, L.L.C. Land Application Permit of Sewage Sludge Renewal for Permit No. WQ0004666000

PLEASE PRINT

Name: <sup>↑ speak ✓</sup> <sup>✓</sup> Carolyn Strnadel III Strnadel

Mailing Address: P.O. Box 469

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

City/State: Inez TX Zip: 77968

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

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

Phone Number: ~~361~~ 361-649-5785

• 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.

MCU

1/14/16

Office of the Chief Clerk  
TCBQ

SLC  
86086

I am writing to sincerely ask you to  
oppose the permit application number  
WQ-0004666000.

Because gnt + grease trap waste contain  
potentially hazardous substances, this permit  
should not be renewed.

I do my part to help protect + care for  
our Earth. I would appreciate my government  
to implement policies that do the same.

Thanks,  
Beth Sestek  
204 Dunbar Dr.  
Uscata, TX 77904

REVIEWED

JAN 20 2016

By [Signature]

CHIEF CLERKS OFFICE

2016 JAN 20 AM 09:18

STATE OF TEXAS  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF PERMITS

(114)



**SLG**  
**86086**

Aurora Swanson  
209 Bloomingdale Cir.  
Victoria, TX 77904

January 15, 2016

REVIEWED  
JAN 15 2016  
By *RS*

2016 JAN 20 AM 9:42  
CHIEF CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

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

To Whom it Concerns,

I wish to express my opposition to Beneficial Land Management, Land Use Application Renewal and Amendment to TCEQ Permit No. WQ0004666000. I request your support in opposing this permit.

I believe it is in the best interest for the community that TCEQ deny renewal of this permit for land application of sewage sludge from a domestic wastewater treatment plant for beneficial use, and deny request for an experimental use authorization for land application of sewage sludge mixed with grease and grit trap waste.

The proposed land use application renewal request and amendment fail to comply with rules and regulations and is inconsistent with TCEQ rules governing sludge use and disposal. Grit and grease trap waste contains potentially hazardous substances, and may include heavy metals and other contaminants. This type of special waste requires special handling and disposal to protect human health and the environment. The proposed land use application renewal and amendment does not adequately address health, safety and welfare concerns, nor the potential to contribute to the impairments of water quality in Arenosa Creek, Lavaca Bay and the Matagorda Basin.

Please implement policies that protect our waterways and conserve natural resources. Clean air, water, and land matter to me. I want a Texas free from pollution.

Sincerely,  
*Aurora Swanson*  
Aurora Swanson

*msw*

Gregg Swanson  
209 Bloomingdale Cir.  
Victoria, TX 77904

January 15, 2016

**SLG**  
**86086**

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

RECEIVED  
JAN 15 2016  
By 

2016 JAN 15 AM 9:43  
CHIEF CLERK'S OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

To Whom it Concerns,

I wish to express my opposition to Beneficial Land Management, Land Use Application Renewal and Amendment to TCEQ Permit No. WQ0004666000. I request your support in opposing this permit.

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Please implement policies that protect our waterways and conserve natural resources. Clean air, water, and land matter to me. I want a Texas free from pollution.

Sincerely,



Gregg Swanson



Paula Swanson  
209 Bloomingdale Cir.  
Victoria, TX 77904

SLG  
86086

REVIEWED  
DATE  
BY *PS*

January 15, 2016

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

2016 JAN 20 AM 9:42  
CHIEF CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

To Whom it Concerns,

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I believe it is in the best interest for the community that TCEQ deny renewal of this permit for land application of sewage sludge from a domestic wastewater treatment plant for beneficial use, and deny request for an experimental use authorization for land application of sewage sludge mixed with grease and grit trap waste.

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Please implement policies that protect our waterways and conserve natural resources. Clean air, water, and land matter to me. I want a Texas free from pollution.

Sincerely,



Paula Swanson



TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

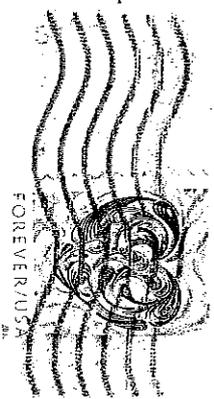
2016 JAN 20 AM 9:42  
CHIEF CLERKS OFFICE

RECEIVED

JAN 19 2016

TOEOMAIL CENTER  
BC

SAN ANTONIO TX 78201  
RIO GRANDE DISTRICT  
16 JAN 2016 PM 3 L



*Office of the Chief Clerk*

*PCFEQ*

*Mail Code ME-105, P.O. Box 13087*

*Austin, TX 78711*

0487-665 (4/2)  
Dallas, TX 75219  
3303 Lee Pkwy #402  
207 # 227, COCC

78711-308797



**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, October 30, 2014 8:29 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000

*SLG  
01/02/15*

**From:** [jcthomas49@suddenlink.net](mailto:jcthomas49@suddenlink.net) [mailto:[jcthomas49@suddenlink.net](mailto:jcthomas49@suddenlink.net)]  
**Sent:** Wednesday, October 29, 2014 8:13 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** MR James C Thomas

**E-MAIL:** [jcthomas49@suddenlink.net](mailto:jcthomas49@suddenlink.net)

**COMPANY:** Thomas Analytical Services, Inc.

**ADDRESS:** 11183 STATE HIGHWAY 30  
COLLEGE STATION TX 77845-7891

**PHONE:** 9795755107

**FAX:** 9797741604

**COMMENTS:** My names is James Thomas. I have a MS degree from Texas A&M University, am a certified professional agronomist and certified nutrient management specialist in Texas. I have prepared numerous NMPs which have gone through the TCEQ review process and been approved. Among those was one for the renewal of permit WQ0004666000. In support of this application I have just finished the first year of a demonstration and submitted the report on Sept 1, 2014. As part of this demonstration I personally supervised the plot layout,

*Marisa*

collection of background soil samples, sludge application to appropriate plots, sampling of the sludge, and subsequent soil sampling after 30 and 90 days. I am pleased to report that all the measured organic compounds (TPH, Benzene, Toluene, Ethylbenzene, Xylene, MTBE) had degraded by 90 days after application and were below detection limits as analyzed and reported by an independent NELAP accredited laboratory. Visual analysis and protein analysis of the grasses from the test plots indicate that the forage quality is increased by the land application of this waste. In my opinion, the data collected to date indicate that land application of this waste to the soil at the Arenosa Creek Ranch is environmentally safe and beneficial for the soil and crop.



that the TCEQ didn't even have a stakeholder meeting to discuss this is disrespectful to the many hardworking owners of these facilities who are diligently attempting to comply with the various rules and regulations mandated by the TCEQ.

As the Association representing the Type V non-hazardous liquid waste processing facilities in Texas, we urge you to amend this permit and remove grease and grit trap waste from the list of waste streams that are allowed at this site.

Please feel free to contact me at (512) 516-3066 if you have any questions concerning the Association or the comments made in this letter.

Sincerely,



Jeff Thompson  
Texas Liquid Waste Processors Association



**Marisa Weber**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, October 30, 2014 8:30 AM  
**To:** PUBCOMMENT-OCC2  
**Subject:** FW: Public comment on Permit Number WQ0004666000  
**Attachments:** Association's letter opposing permit.pdf

*SLG*  
*06/03/14*

**From:** [jeff.thompson@liquidenviro.com](mailto:jeff.thompson@liquidenviro.com) [mailto:[jeff.thompson@liquidenviro.com](mailto:jeff.thompson@liquidenviro.com)]  
**Sent:** Wednesday, October 29, 2014 6:18 PM  
**To:** donotreply  
**Subject:** Public comment on Permit Number WQ0004666000

**REGULATED ENTY NAME** ARENOSA CREEK RANCH

**RN NUMBER:** RN103911889

**PERMIT NUMBER:** WQ0004666000

**DOCKET NUMBER:**

**COUNTY:** VICTORIA

**PRINCIPAL NAME:** BENEFICIAL LAND MANAGEMENT LLC

**CN NUMBER:** CN600919591

**FROM**

**NAME:** Jeff Thompson

**E-MAIL:** [jeff.thompson@liquidenviro.com](mailto:jeff.thompson@liquidenviro.com)

**COMPANY:** Texas Liquid Waste Processors Association

**ADDRESS:** 305 W 13TH ST  
AUSTIN TX 78701-1822

**PHONE:** 5125163066

**FAX:**

**COMMENTS:** Enclosed are the comments from the Texas Liquid Waste Processors Association, an Association that represents the Type V Non-hazardous liquid waste processors.

*MW*

TEXAS LIQUID WASTE PROCESSORS ASSOCIATION  
Representing Type V Facilities

October 29, 2014

Ms. Bridget C. Bohac

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

RE: AMENDED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN A BENEFICIAL LAND USE PERMIT RENEWAL

PERMIT NUMBER: WQ0004666000, BENEFICIAL LAND MANAGEMENT, LLC

OPPOSITION TO GRANTING OF RENEWAL WITH CHANGES OR EXTENSION OF EXPERIMENTAL USE LAND APPLICATION PERMIT FOR GREASE AND GRIT TRAP WASTE

Dear Ms. Bohac:

I am writing on behalf of the Texas Liquid Waste Processors Association, which represents Type V owners throughout Texas, including facilities in Houston, Dallas, San Antonio, Austin, El Paso, Fort Worth, Beaumont and the Valley.

We are writing in opposition to PERMIT NUMBER: WQ0004666000. We are strongly opposed to including grease and grit trap waste in this land application permit because it is potentially harmful to the environment and the people who live near this site as well as it gives one company an unfair advantage over every other Type V facility in the state.

There is a reason why the TCEQ regulations correctly prohibit the land application of grease and grit trap waste. Grease trap waste consists primarily of waste from food service establishments. This includes food scraps, grease, and other waste (like cleaning products and pesticides) that are sent down the drain and "caught" by the "trap". This waste normally contains an acidic pH, generates strong odors, and attracts vectors if not properly handled. Land application of this waste can easily create nuisances for families living near these sites. Grit trap waste also frequently contains high levels of petroleum oil and metals that are harmful to plants and animals and can also leach into groundwater. That is why after grease and grit trap waste is processed at a Type V facility, it is sent to a landfill or permitted composting site that has an impermeable liner to make sure the remaining pollutants cannot penetrate the water table.

Secondly, by allowing this unprecedented exception to the Rules, and consenting to this company's land application of grease and grit trap waste, the TCEQ is granting a single operator an unfair economic advantage over all of the other owners and operators of facilities around the state. Every other Type V owner pays significant tipping fees to landfills to dispose of this waste after they have processed it. Allowing one company to evade this and simply dump the waste on the ground for free is not fair to the many hard working operators who comply with the rules and properly dispose of this waste. The fact

305 West 13th Street, Austin, TX 78701

that the TCEQ didn't even have a stakeholder meeting to discuss this is disrespectful to the many hardworking owners of these facilities who are diligently attempting to comply with the various rules and regulations mandated by the TCEQ.

As the Association representing the Type V non-hazardous liquid waste processing facilities in Texas, we urge you to amend this permit and remove grease and grit trap waste from the list of waste streams that are allowed at this site.

Please feel free to contact me at (512) 516-3066 if you have any questions concerning the Association or the comments made in this letter.

Sincerely,



Jeff Thompson  
Texas Liquid Waste Processors Association

## TEXAS LIQUID WASTE PROCESSORS ASSOCIATION

Representing the Type 5 Facilities

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

RE: AMENDED NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN A  
BENEFICIAL LAND USE PERMIT RENEWAL  
PERMIT NUMBER: WQ0004666000, BENEFICIAL LAND MANAGEMENT, LLC  
**OPPOSITION TO GRANTING OF RENEWAL WITH CHANGES OR EXTENSION OF  
EXPERIMENTAL USE LAND APPLICATION PERMIT FOR GREASE AND GRIT TRAP WASTE**

Dear Ms. Bohac:

I am writing on behalf of the Texas Liquid Waste Processors Association, which represents Type V5 owners located throughout Texas, including facilities in Houston, Dallas, San Antonio, Austin, El Paso, Fort Worth, Beaumont and the Valley.

We are writing in opposition to PERMIT NUMBER: WQ0004666000. We are strongly opposed to including grease and grit trap waste in this land application permit because it is potentially harmful to the environment and the people who live near this site as well as it gives one company an unfair advantage over every other Type V5 facility in the state.

There is a reason why the TCEQ correctly prohibits the land application of grease and grit trap waste. Grease trap waste consists of the waste primarily from food service establishments. This normally consists of food waste, grease and other waste (like cleaning products and pesticides) that are sent down the drain and "caught" by the grease trap. This waste normally contains an acidic pH, which creates strong odors and attracts vectors. Having this land applied will create nuisances for the people living near these sites as well as containing elements that can be deadly poisonous to the plants, soil and animal life. Grit trap waste can contains high levels of petroleum oil and metals ~~that and are~~ can be harmful to plants and animals as well as can penetrate into the water table. That is why after grease and grit trap waste is processed at a Type V5 facility it is sent to a landfill or permitted composting site that has a impermeable liner to make sure the remaining pollutants cannot penetrate the water table.

Secondly, what the TCEQ is doing by allowing this unprecedented exception to the Rules and permit this company to land apply grease and grit trap waste is to ignore all of the other

owners and operators of facilities around the state and give an unfair economic advantage to single operator. Every other Type V5 owner pays significant tipping fees to landfills to dispose of this waste after they have processed it. Allowing one company to evade this and simply dump the waste on the ground for free is not fair to the many hard working operators who comply with the rules and properly dispose of this waste. The fact that the TCEQ didn't even have a stakeholder meeting to discuss this is disrespectful to the many hardworking owners of these facilities who are working diligently to comply with the various rules and regulations mandated by the TCEQ.

As the Association representing the Type V5 non-hazardous liquid waste processing facilities in Texas, we urge you to amend this permit and remove grease and grit trap waste from the list of waste streams that are allowed at this site.

Please feel free to contact me if you have any questions concerning the Association or comments made in this letter.

Sincerely,

Jeff Thompson  
Representing the Texas Liquid Waste Processing Association

REVIEWED

JAN 21 2009

By 

2009 JAN 21 AM 10:09  
CHIEF CLERK'S OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

To Honorable:

- 1) Mr. Phil Steveson, State Rep. Texas
- 2) Lois Kolkhorst, State Sen. Texas
- 3) Office of Chief, Clerk Enviromental Quality

SLG  
86086

As a registered voter in the county of Jackson I am not in favor of allowing a land owner to begin a dump on land near Arenosa Creek. This is not fertilizing the land, only a greed proposal that will corrupt the creek in time.

Thank you for your time and vote against this situation.

Charles Tipton

409 S. Pumphrey

Edna, Texas 77957

permit application number WQ0004666000





Mr. Charles Tipton  
409 S. Pumphrey St.  
Edna, TX 77957

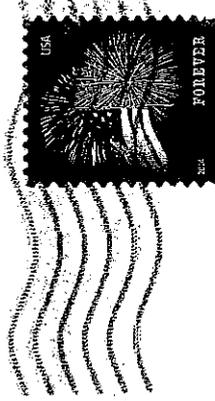
TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2016 JAN 21 AM 10:08  
CHIEF CLERKS OFFICE

RECEIVED

JAN 21 2016

TCEQ MAIL CENTER  
JR

CORPUS CHRISTI  
TX 784 1 T  
19 JAN 2016 ~ PM



Office of the Chief Clerk  
TEX. COMMISSION ON ENVIRONMENTAL  
QUALITY (TCEQ)  
MAIL CODE MC-105 PO BOX 13087  
AUSTIN, TEX. 78711



17 JAN 2016

REVIEWED

JAN 21 2016

By

SLG  
86086

2016 JAN 21 AM 10:08  
CHIEF CLERK OFFICE

PERMISSION  
COMMITTEE  
ON ENVIRONMENTAL  
QUALITY

To Honorable:

- 1) Mr. Phil Steveson, State Rep. Texas
- 2) Lois Kolkhorst, State Sen. Texas
- 3) Office of Chief, Clerk Enviromental Quality

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Thank you for your time and vote against this situation.

Charles Tipton

409 S. Pumphrey

Edna, Texas 77957

permit application number WQ0004666000

CM

They should oppose  
the permit application  
Number WQ-0004666000.

SLG  
86086

Gloria Jones Torres  
406 Navajo Dr  
Victoria, TX 77904

COMMISSION  
ON ENVIRONMENTAL QUALITY

2016 JUN 26 AM 9:19

CHIEF CLERKS OFFICE

*Handwritten initials*

*Handwritten initials*

**SLG**

**86086**

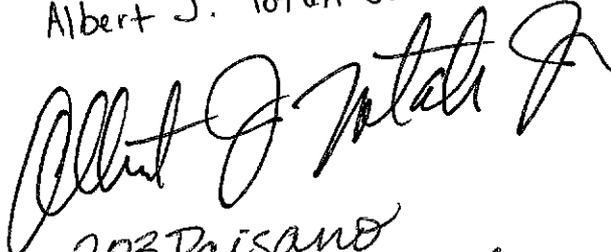
Chief Clerk TCEQ  
MC-105 P>O> Box 13087  
Austin Texas 78711

RECEIVED  
MAY 20 1999  
R

2009 MAY 20 AM 9:53  
CHIEF CLERKS OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Being a land owner in the Inez area I object to the dumping of the sludge. Since grit and grease trap waste contains potentially hazardous substances they should oppose permit application WQ-0004666000 we deserve a clean and healthy enviroment.

Albert J. Totah Jr.  
  
203 Paisano  
Victoria, TX 77904

MW

**SLG**  
**86086**

Chief Clerk TCEQ  
MC-105 P>O> Box 13087  
Austin Texas 78711

RECEIVED  
By *hf*

2016 APR 29 AM 9:53  
CHIEF CLERK OFFICE

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Being a land owner in the Inez area I object to the dumping of the sludge. Since grit and grease trap waste contains potentially hazardous substances they should oppose permit application WQ-0004666000 we deserve a clean and healthy enviroment.

*Ava Totah*  
203 Pausano  
Victoria, TX 77904  
Totah

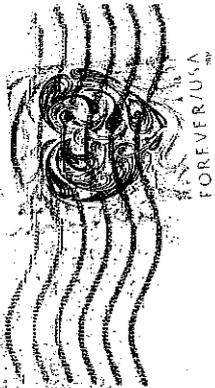
*Mc*

AUSTIN TX 78704 Suite 120  
105 W. Riverside Dr

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2016 JAN 20 AM 9:53

CHIEF CLERKS OFFICE



SAN ANTONIO TX 780  
RIO GRANDE DISTRICT  
16 JAN 2016 PM 3 L

JAN 19 2016

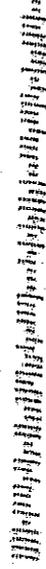
TCEQ MAIL CENTER  
DC

Office of the Chief Clerk

TCEQ

Mail Code MC-105, P.O. Box 13087  
Austin, TX 78711

154803-1142





John Waak  
107 Dunbar Dr.  
Victoria, TX 77904

**SLG**  
**86086**

1/14/16

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

CHIEF CLERK'S OFFICE

2016 JAN 21 10 05 AM

NO  
RECEIVED

Dear Chief Clerk:

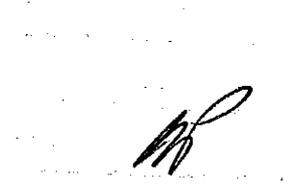
Texas is currently considering the renewal of an environmental permit to experiment with the dumping of waste trap grease and human sewage sludge as land fertilizer.

This is a practice that concerns me greatly. I ask you to vote against permit application number WQ0004666000. Before we ruin our land and water, lets determine safe and effective ways to dispose of potentially dangerous waste. Preserving our environment is a responsibility of us all.

Thank you for taking the time to listen to the concerns of Texans.

Sincerely,

  
John Waak



*Handwritten initials*

Office of the chief clerk  
Texas Commission on Environmental Quality  
mail code MC-125 P.O. Box 13087  
Austin tx 78711

I oppose the permit Application #  
WQ-0004666000

Thank You  
Doug Downy Warren Warren  
305 Bloomingdale Circle  
Victoria tx 77904

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

2016 JUN 20 AM 9:51

CHIEF CLERKS OFFICE

RECEIVED

JUN 20 2016

BY: *AK*

MW

**SLG**  
**86086**

1/13/2016

Dear Office of Chief Clerk, TCEQ, Mail Code MC-105, P.O. Box 13087, Austin TX 78711

Re: permit application number WQ-0004666000

I am aware that TCEQ is considering renewing the above referenced permit. As a landowner in Oklahoma and as a homeowner in Victoria Texas I am concerned about introducing heavy metals to our environment. I am not opposed to landowners doing with their land as they see fit but their actions might affect others rights.

Because of the heavy metals getting into our soils and then into our waterways I have become concerned. Please do what you can to denigh the renewal of this permit unless you can guarantee our safety.

Warm regards,  
Henry Weber  
802 Champions Row  
Victoria, TX 77904

*Henry Weber*

RECEIVED  
JAN 13 2016  
OFFICE OF THE CHIEF CLERK  
*[Signature]*

CHIEF CLERKS OFFICE

2016 JAN 20 AM 9:54

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY

*[Handwritten mark]*

**SLG**  
**86086**

January 13, 2016

State Rep. Geannie Morrison  
1908 N. Laurent, Suite 500  
Victoria, Texas 77901

State Sen. Lois Kolkhorst  
5606 N. Navarro, #300X  
Victoria, Texas 77904

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



CHIEF CLERKS OFFICE

JAN 14 2016 10:00 AM

TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY

To Whom It May Concern:

Grit and grease trap waste contains potentially hazardous substances. Please oppose the permit application number WQ-0004666000.

Please implement policies that protect our waterways and conserve natural resources.

Sincerely,  
*Judy Westbrook*  
Judy Westbrook  
317 Tracy Lane  
Victoria, Texas 77904



**SLG**

**86086**

January 13, 2016

State Rep. Geannie Morrison  
1908 N. Laurent, Suite 500  
Victoria, Texas 77901

State Sen. Lois Kolkhorst  
5606 N. Navarro, #300X  
Victoria, Texas 77904

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

To Whom It May Concern:

Grit and grease trap waste contains potentially hazardous substances. Please oppose the permit application number WQ-0004666000.

Please implement policies that protect our waterways and conserve natural resources.

Sincerely,



Robert Westbrook  
317 Tracy Lane  
Victoria, Texas 77904



CHIEF CLERKS OFFICE

2016 JAN 20 AM 10:06

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY



SLG  
86086

State Rep Geannie Morrison State  
Sen LMS Kolchak, Office of the  
Chief Clerk,

We do not want to renew permit  
WD-004666000. We do NOT want  
to be experimented anymore!

~~888~~ Santa Fe  
Victoria TX, 77901  
Darrel Woodard

CHIEF CLERK'S OFFICE

2014 APR 21 AM 10:12

COMMUNICATIONS SECTION

MP

MP

State Rep Granville Morrison State  
Sen Lois Wickham, Office of the  
Chief Clerk,

We do not want to renew permit  
WA-004666000. We do NOT want  
to be experimented anymore!

808 Santa Fe  
Victoria TX, 77901  
D'Joilyn Woodard

SLG  
86086

CHIEF CLERK'S OFFICE

2014 JUN 04 AM 10:00

ON SENATOR'S DESK

AP

2/24

1-15-2016

I am opposed to the  
PERMIT APPLICATION #

W.Q. 0004666000

TEXAS DESERVE + clean

Healthy environment

@ wpl

AP D Wright

102 LAGUNA

CHIEF CLERKS OFFICE

AM 9:54

WICTORIA TX

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

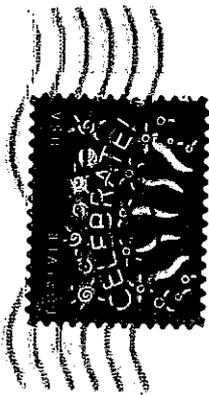
77904

mm

D Wright  
102 Laguna  
Victoria TX

77904

SAN ANTONIO TX 780  
RIO GRANDE DISTRICT  
FEB 20 2016 PM 3 L



JAN 19 2016

TCEQ MAIL CENTER  
BC

Office of the Chief Clerk  
Texas Commission of Environmental Quality  
(TCEQ)

M.A.L. CODE MC 105  
PO Box 13087

ALBERTA TX

CHIEF CLERK'S OFFICE

2016 JAN 20 AM 9:54

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

68

TCEQ Public Meeting Form  
January 21, 2016

Beneficial Land Management, L.L.C.  
Land Application Permit of Sewage Sludge  
Renewal for Permit No. WQ0004666000

PLEASE PRINT

Name: Ben Zeller, Victoria County Judge

Mailing Address: 115 N Bridge St

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

City/State: Victoria Zip: 77901

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

Email: bzeller@vctx.org ✓

Phone Number: 361-575-4558

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

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 initials/signature

State Representative Geannie Morrison  
1908 N Laurent Ste 500  
Victoria TX 77901

State Sen. Lois Kolkhorst  
5606 N Navarro #300X  
Victoria TX 77904

**SLG**  
**86086**

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



To Whom It May Concern:

I oppose the permit application number WQ-0004666000.

Thank you,

*M. Logan Zettlemeier* Zettlemeier

709 Santa Fe  
Victoria TX  
77904

CHIEF CLERKS OFFICE

2016 JAN 20 10 09 19

COMMISSIONER  
ON ENFORCEMENT  
DIVISION

