

REGISTRATION NO. 710921

APPLICATION BY	§	BEFORE THE
CHILDRESS OUTHOUSES, LLC	§	
FOR	§	TEXAS COMMISSION ON
REGISTRATION NO. 710921	§	
	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR'S RESPONSE TO MOTIONS TO OVERTURN

The Executive Director of the Texas Commission on Environmental Quality (TCEQ) files this response to the Motions to Overturn (Motions) the Executive Director's decision to approve and issue Beneficial Land Use Registration No. 710921 to Childress Outhouses, LLC. The Executive Director has re-evaluated the application and reviewed the issued registration in light of the issues raised by the Movants. The Executive Director concludes that the registration includes the necessary technical requirements to ensure that the site, if operated according to the terms of the registration, will be protective of human health and the environment. However, a revised map submitted by Childress Outhouses, LLC (Registrant) containing adequate buffer zones from surface water and the locations of storage areas was not attached to the approved registration. The Executive Director, therefore, recommends that the Commission grant the Motions to Overturn and remand the registration to the Executive Director so that the revised map (ED's Exhibit A) submitted by Registrant can be substituted for the original map presently attached to the registration. In the alternative, the Commission can attach the revised map and issue the registration.

I. BACKGROUND

On June 6, 2012, the Executive Director issued registration No. 710921 to Robert Lee Childress and Childress Outhouses, LLC (ED's Exhibit B). The registration authorizes the beneficial land application of domestic septage at a rate not to exceed 122,308 gallons per acre per year on approximately 30 acres within a 45.79 acre-tract located at 605 County Road 121, in Marble Falls, in Burnet County, Texas.

The registration was mailed to the Registrant on June 12, 2012. Pursuant to 30 TAC § 50.139, the 23-day deadline to file a Motion to Overturn was July 5, 2012, based on the authorization issuance date of June 6, 2012. The Office of the Chief Clerk received timely filed Motions to Overturn from the Central Texas Groundwater Conservation District (CTGCD), the Texas Campaign for the Environment (TCE), Greater Edwards Aquifer Alliance (GEAA), Danielle Meredith, Wayne T. Schroeder, James R. Livingston, William Matern, Jr., David and Helen Fisher, Donald Petrosky, Sr., Bobbye Hensley-Michel, Cindy Struchen, Leta Ebeling, Steve Ebeling, Bill and Gay Galey, Stephanie Ebeling, Fran

Barrington, Heston S. McBridger, Jr., Kenneth and Jennifer Pearson, Mr. and Mrs. Jack Roger, Don Petrosky, Jr., Wilford H. Landrum, Shannon L. Brown, Cathy Kovenich, Mike Struchen, Allen Fisher, Daniel England, and Sherrie K. England (Concerned Citizens). The above-named groups and individuals will also be referred to as the Movants. TCEQ's Office of the Chief Clerk also received letters after the MTO deadline from Randall and Charlotte Hamilton, Mark Richert, Lee and Annette Ussery, Edwin M. and Judy L. McLean, Judy Womack, Tom Taylor, Bob Evans, Marie Elizabeth Lechow, Lou Plotkin and Kerry Spaniall, Weldon and Sherry M. Nabors, Joe and Janice LaRue, George and Mary McCoy, and David and Barbara Bend. In addition, TCEQ received a letter after the deadline supporting the Motions from Burnet County Judge Donna Klaeger on behalf of the Burnet County Commissioner's Court. A summary of the concerns raised in the Motions to Overturn and the Executive Director's responses follows.

II. ANALYSIS OF ISSUES RAISED BY MOVANTS

A. General health concerns

CTGCD, TCE, GEAA, and Concerned Citizens are concerned that the land application site is in the recharge zone of the Granite Gravel Aquifer, the sole water supply for many people. They stated that land application of domestic septage will pollute the aquifer, causing harm to people and the environment. The Movants stated that the site is also adjacent to a gravel quarry, which has already exposed the aquifer. The porous nature of the soil increases the potential for direct runoff into the aquifer, especially during high rainfall events. CTCGD, TCE, and GEAA stated that buffers are insufficient to ensure adequate protection of groundwater, including the lack of one for a tributary of Backbone Creek that crosses the land application site. TCE and GEAA stated that the application and registration does not adequately address on-site storage of septic waste, specifically structures and methods which will be used to control nuisance conditions.

Executive Director's Response

This authorization is not a permit that authorizes a discharge of treated domestic wastewater at a particular flow. It is a registration for beneficial land application and does not authorize a discharge into or adjacent to "water in the State." TCEQ has established management requirements, in accordance with 30 TAC § 312.44, which are incorporated into the registration to protect against domestic septage runoff and surface and groundwater contamination. The requirements in 30 TAC § 312.44(h) are designed to prevent runoff from land application facilities beyond the active application area and to protect the quality of groundwater and surface water within the application area. In accordance with 30 TAC § 312.44(c)(2), the Registrant must maintain a 150-foot buffer between septage application areas and all private water wells, and a 500-foot buffer from public water supply wells, intakes, public water supply springs or similar sources, public

water treatment plants, or public water supply elevated or ground storage tanks. In accordance with 30 TAC § 312.44(c), the Registrant is required to maintain a (1) 200-foot buffer zone from the application area and any groundwater conduits, (2) 200-foot buffer zone from surface water if septage is not incorporated or a 33-foot buffer zone if septage is incorporated, and (3) 50-foot buffer zone surrounding the property boundary. In addition, the registration contains Special Provision E, which states that all septage staging areas shall be located outside of these required buffer zones.

The Registrant is required to apply septage uniformly over the surface of the land under conditions that prevent sludge runoff beyond the active application area.¹ The Registrant must also protect the quality of surface water and soils in the unsaturated zone. The Registrant is prohibited from applying septage during rainstorms or during periods in which surface soils are water saturated, frozen, or snow-covered and in areas having topographical slopes in excess of eight percent.² This application area has a slope of less than eight percent. The registration requires the Registrant to cease further sludge application if sludge runoff from the active application area is evident and until the condition is corrected.³ The registration also requires that the Registrant prevent septage debris from leaving the site.⁴

One standard limitation provision in the registration requires the Registrant to apply septage at a rate equal to the nitrogen uptake rate of the plants being grown (the agronomic rate), thus ensuring that the nutrients are fully utilized by the plant and none are available for vertical seepage into groundwater or horizontal migration into surface water bodies.⁵ The Registrant is required to land apply septage at rates no greater than the agronomic rates. Agronomic rate is defined as the whole sludge/septage application rate (dry weight basis) designed to:

- (A) provide the amount of nitrogen needed by the crop or vegetation grown on the land; and
- (B) minimize the amount of nitrogen in the septage that passes below the root zone of the crop or vegetation grown on the land to the groundwater.

The registration contains provisions in accordance with 30 TAC Chapter 312, which are designed to keep domestic septage within the plant rooting zone, generally the top few inches of the soil profile. The majority of plant roots are in the top 6 inches of soil. The following regulated management provisions in the approved registration provide additional safeguards for groundwater protection:

¹ See 30 TAC § 312.44(h)

² *Id.*

³ *Id.*

⁴ See 30 TAC § 312.44(j) and Exhibit B, Page 4, Section V.D.10

⁵ See Exhibit B, Page 2, Section V.A.1

Septage cannot be applied to soils with permeability rates greater than twenty inches per hour.

For soils with permeability greater than 2 inches per hour and less than 20 inches per hour, the land application of domestic septage is prohibited if the soil is saturated or groundwater is present within a depth of 4 feet of the treatment zone as demonstrated through the determination of presence or absence of the perched or apparent water table. Records of monitoring data shall be maintained per 30 TAC §312.47. In the absence of groundwater monitoring, land application is prohibited during months that the most recently published soil survey data indicate that a perched or apparent water table may be present within 4 feet of the treatment zone.

For soils with permeability less than 2 inches per hour, the land application of domestic septage is prohibited if the soil is saturated or groundwater is present within a depth of 3 feet of the treatment zone as demonstrated through the determination of presence or absence of the perched or apparent water table. Records of monitoring data shall be maintained per 30 TAC §312.47. In the absence of groundwater monitoring, land application is prohibited during months that the most recently published soil survey data indicate that a perched or apparent water table may be present within 3 feet of the treatment zone.⁶

Considering the site specific conditions indicated in the registration application and the proposed application rate, the domestic septage is expected to remain within the plant rooting zone for uptake by the crop, and not reach the aquifer or any “water in the State.”

The TCEQ Water Quality Assessment Team considered the importance of the local groundwater and surface water resources, the nutrient and water requirements of the crop to be grown onsite, the soil types identified within the land application area, and the management practices outlined in 30 TAC §312.44 in its review of this registration. The Water Quality Assessment Team concluded that no adverse impacts would occur to groundwater or surface water if the Registrant complies with the regulations and the conditions specified in the registration. These requirements and practices will negate the potential to recharge the Granite Gravel Aquifer and contaminate any groundwater or surface water.

⁶ See Exhibit B, Page 3, Section V.D.5-7

B. General Technical Concerns

CTCGD, TCE, and GEAA stated that the Registrant submitted deficient items and that the registration was issued on incomplete information and analysis. They claim that there was insufficient mapping; incorrect characterization of soil conditions; failure of Special Provisions to address all operational considerations; hauling of non-domestic septage; failure to provide certification of a licensed professional engineer or geoscientist that liners and berms met certain criteria; insufficient information regarding waste management; lack of stocking rate; and lack of frequency of septage application.

Executive Director's Response

The approved registration authorized the Registrant to accept only domestic septage.⁷ Acceptance and land application of any other type of septage would be a violation of this registration.

The Registrant submitted a revised map that addresses most of the technical concerns; however, it did not get attached to the registration. The original map did not include the domestic septage storage areas. The revised map contains this information and the fact that the storage areas are bermed. The registrant will be using an enclosed storage, which does not necessitate liner, fencing, and the other requirements in 30 TAC § 312.50. The revised map also contains information regarding Backbone Creek that was missing from the original map that was attached to the approved registration. The revised map discloses the location of the creek and the fact that it is properly buffered in accordance with TCEQ rules.

During the application review process, the Registrant was required to submit a revised map depicting the storage areas and proper buffer zones from surface water. The Registrant complied by submitting a revised map (Exhibit "A"). The revised map was inadvertently not attached to the approved registration. This may have created the confusion regarding the completeness of the information provided to the Executive Director by the Registrant. Accordingly, the Executive Director is recommending that the MTOs be granted so that the revised and detailed map submitted by the Registrant can be attached to the registration.

The application was reviewed by a staff agronomist who has all the necessary information needed in the application to perform her review. It is her professional opinion that the Registrant did not mischaracterize the soil conditions provided in the application. She also conducted a desk review utilizing other information, including but not limited to 30 TAC Chapter 312, published soil data available to her from TCEQ's resources, and data and

⁷ . See Exhibit B, Page 2, Section V.A.5

information from the United States Department of Agriculture, Natural Resources Conservation Service.

The registration contains adequate best management practices and operational requirements including record keeping, reporting, pathogen control, and vector reduction requirements. The registration was prepared in compliance with all relevant provisions of the Texas Health and Safety Code, the Texas Water Code, and TCEQ rules at 30 TAC Chapter 312. TCEQ staff has concluded that the registration includes the necessary technical requirements to ensure that the site, if operated according to the terms of the registration, will be protective of human health and the environment.

V. CONCLUSION

The Executive Director respectfully requests that the Commission grant the Movants' Motions and remand the registration to the Executive Director so that the revised map which contains buffer zones and storage area information can be substituted for the original map presently attached to the registration. In the alternative, the Commission can attach the revised map, correct the typographical error on page one of the registration (delete a duplicate clause "at midnight"), and issue the registration.

Respectfully submitted,
Texas Commission on Environmental
Quality

Zak Covar
Executive Director

Robert Martinez, Director
Environmental Law Division

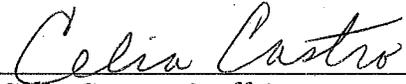
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REPRESENTING THE EXECUTIVE
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CERTIFICATE OF SERVICE

I certify that on August 1, 2012, the original and seven true and correct copies of "Executive Director's Response to Motions to Overturn" was filed with the Texas Commission on Environmental Quality's Office of the Chief Clerk, and a true and correct copy was transmitted by mail, electronic mail, facsimile, or hand-delivery to all persons on the attached mailing list.



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EXHIBIT A

County Road 121

Childress
#710921

Entrance

N#

Barn

Holding Tank
 Barn Area

200' Buffer

33' Buffer

200' Buffer

Holding Tank
 Located with Barn

Lot # 11.0M

1" = 200'

N

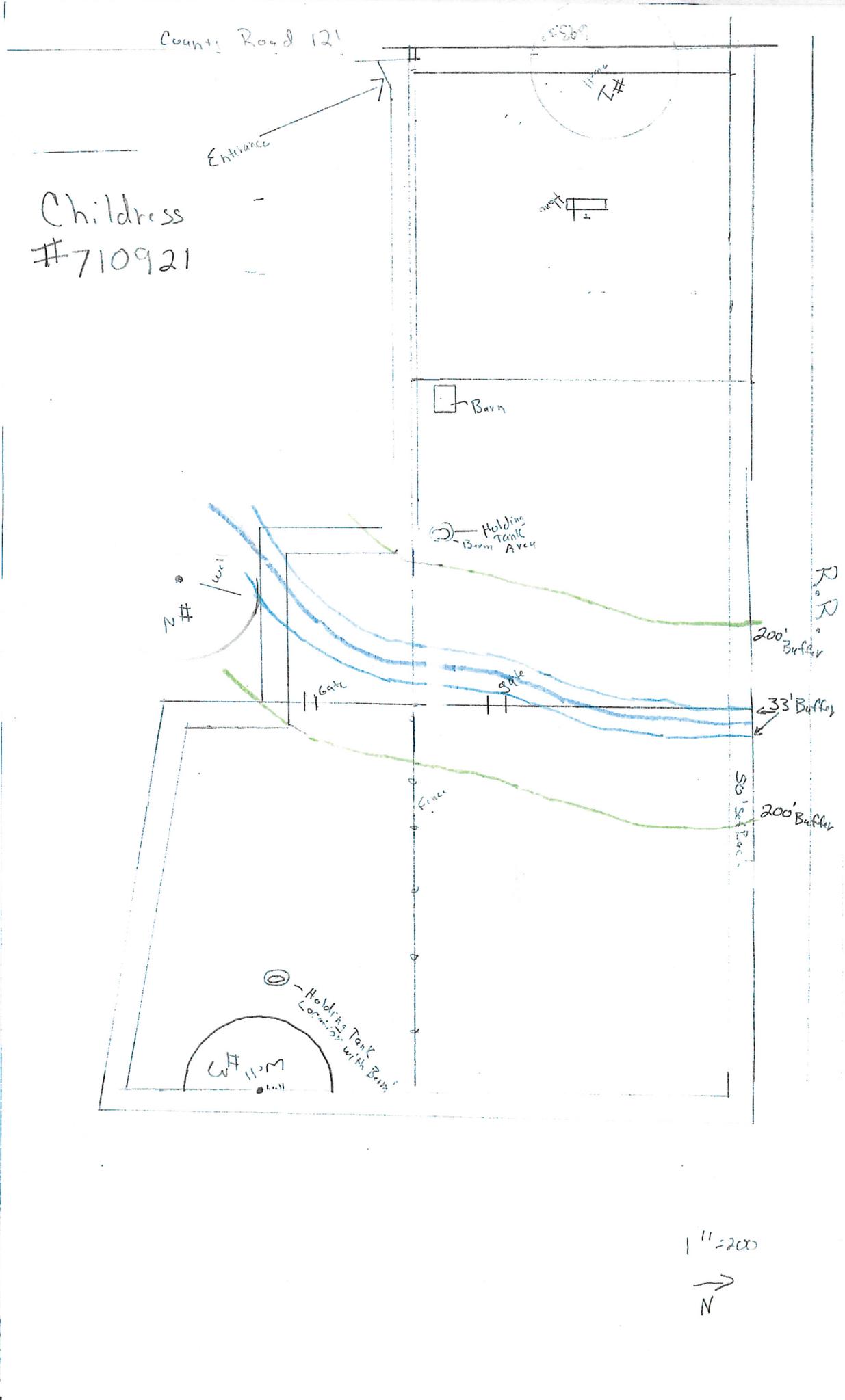


EXHIBIT B



State Registration No. 710921

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
P.O. Box 13087
Austin, Texas 78711-3087

DOMESTIC SEPTAGE REGISTRATION

I. Registration No: 710921

II. Sludge Registration Issued to:

Site Operator
Childress Outhouses, LLC
605 County Road 121
Marble Falls, Texas 78654

and

Landowner
Robert Lee Childress
605 County Road 121
Marble Falls, Texas 78654

III. Sludge Site: Domestic septage will be beneficially land applied on 30 acres located within an approximate 45.79 acres. This site is located at 605 County Road 121, Marble Falls, Burnet County, Texas 78654. (See Attachment A).

IV. Authorization: Land Application of Domestic Septage (SIC Code 4952)

This registration and the authorization contained herein shall expire at midnight at midnight five years from the date of issuance.

DATE ISSUED: June 6, 2012


For the Commission

V. Standard Provisions**A. Limitations:**

1. Domestic septage cannot be applied in excess of the maximum septage application rate based on crop nitrogen needs (i.e., the agronomic rate), which is calculated based on the total amount of nitrogen in the septage to be applied and in the soils at the application site and on the nitrogen requirements of the vegetation in the application area.
2. The maximum domestic septage application rate must be calculated using Appendix A of the "Application to Register a Site for the Beneficial Use of Domestic Septage."
3. Pathogen reductions and vector attraction reduction must be met, as per 30 TAC §312.82(c) and §312.83(b)(9), (10) or (12) respectively, for any septage applied.
4. Domestic septage can be applied only to the application area shown on Attachment B.
5. The registrant is authorized to accept domestic septage only.

B. Operation Requirements:

The operation and maintenance of this land application site must be in accordance with 30 TAC Chapter 312 and Title 40 of the Code of Federal Regulations (40 CFR) Part 503 as they relate to land application for beneficial use. All applicable local and county ordinances must also be followed.

C. Reporting Requirements:

A report will be required annually to document the use of the site. The report must include the following information:

1. Site registration number, and the location (address or latitude/longitude) of the site.
2. Total number of acres where domestic septage applications occurred.
3. Date and time of each domestic septage application.
4. The annual nitrogen requirement for each crop or the vegetation grown at the site.
5. Rate of domestic septage application (gallons/acre/year).
6. The certification statement in 30 TAC §312.47(b)(6).
7. A description of how the pathogen requirements in 30 TAC §312.82(c)(1) and (2) were met.
8. A description of how the vector attraction requirements in 30 TAC §312.83(b)(9), (10) or (12) were met.
9. Soil test reports, as per Section V.G.
10. All laboratory tests submitted to demonstrate compliance with this registration must meet the requirements of 30 TAC Chapter 25, Environmental Testing Laboratory Accreditation and Certification.

An annual report must be submitted by September 30th of each year per 30 TAC §312.48 which includes all required information above for a period covering September 1st of the previous year through August 31st of the current year. Additionally an "Annual Sludge Summary Report Form" (Attachment C) should be filled out and submitted with the annual report. Submit your report to the Water Quality Division, Municipal Permits Team (MC 148) and the TCEQ Regional Office (MC Region 11). Record retention requirements must be followed in accordance with 30 TAC §312.47(b) for domestic septage.

D. Regulated Management Conditions:

1. Domestic septage applications must not cause or contribute to the harm of a threatened or endangered species of plant, fish, or wildlife or result in the destruction or adverse modification of the critical habitat of a threatened or endangered species.
2. Domestic septage must not be applied to land that is flooded, frozen or snow-covered.
3. Domestic septage applied to the land must maintain the following buffer zones for each application area:

a. Established school, institution, business or residence	750 feet
b. Public water supply well, intake, public water supply spring or similar source, public water treatment plant, or public water supply elevated or ground storage tank	500 feet
c. Solution channels, sinkholes, or other conduits to groundwater	200 feet
d. Waters in the State of Texas - when septage is not incorporated	200 feet
e. Waters in the State of Texas - when septage is incorporated within 48 hours of application and a vegetated cover is established	33 feet
f. Private water supply well	150 feet
g. Public right of way	50 feet
h. Property boundary	50 feet
i. Irrigation conveyance canals	10 feet
4. Domestic septage must be applied to the land at an annual application rate that is equal to or less than the agronomic rate for the vegetation in the area on which the material is applied.
5. Septage cannot be applied to soils with permeation rates greater than twenty inches per hour.
6. For soils with permeability greater than 2 inches per hour and less than 20 inches per hour, the land application of domestic septage is prohibited if the soil is saturated or groundwater is present within a depth of 4 feet of the treatment zone as demonstrated through the determination of presence or absence of the perched or apparent water table. Records of monitoring data shall be maintained per 30 TAC §312.47. In the absence of groundwater monitoring, land application is prohibited during months that the most recently published soil survey data indicate that a perched or apparent water table may be present within 4 feet of the treatment zone.
7. For soils with permeability less than 2 inches per hour, the land application of domestic septage is prohibited if the soil is saturated or groundwater is present within a depth of 3 feet of the treatment zone as demonstrated through the determination of presence or absence of the perched or apparent water table. Records of monitoring data shall be maintained per 30 TAC §312.47. In the absence of groundwater monitoring, land application is prohibited during months that the most recently published soil survey data indicate that a perched or apparent water table may be present within 3 feet of the treatment zone.

8. Land application of domestic septage must not occur when the soil is water saturated as evidenced by visible pooling of water. Regulatory support for this condition can be found at 30 TAC §312.44(h)(3).
9. Domestic septage must be applied by a method and under conditions that prevent runoff beyond the active application area and that protect the quality of the surface water and the soils in the unsaturated zone. In addition, the following conditions must be met:
 - a. Domestic septage must be applied uniformly over the surface of the land.
 - b. Domestic septage must not be applied to areas where permeable surface soils are less than 2 feet thick.
 - c. Domestic septage must not be applied during rainstorms or during periods in which surface soils are water-saturated.
 - d. Domestic septage must not be applied to any areas having a slope in excess of 8%.
 - e. Where runoff from the active application area is evident, the operator must cease further domestic septage application until the condition is corrected
10. The site operator must prevent public health nuisances. Domestic septage debris must be prevented from leaving the site. Where nuisance conditions exist, the operator must eliminate the nuisance as soon as possible.
11. Domestic septage application practices must not allow uncontrolled public access, so as to protect the public from potential health and safety hazards at the site.

E. Pathogen Control:

1. Domestic septage applied to the site must have a pH raised to 12 or higher by alkali addition and, without the addition of more alkali, remain at 12 or higher for a period of at least 30 minutes. Records that demonstrate these conditions for each load of domestic septage must be maintained at this site for five (5) years. If the alkali addition occurs in a transport vehicle, the records must also be maintained in the vehicle for one (1) month and at the offices of the transporter's company for five (5) years.
2. In addition to controlling pathogens, the following site restrictions must be met:
 - a. Food crops with harvested parts totally above the land surface in areas where domestic septage has been applied must not be harvested from the land for at least 14 months after the last application of domestic septage if any of the harvested parts contact the domestic septage or soil.
 - b. Food crops with harvested parts below the surface of the land must not be harvested from the land for at least 20 months after application of domestic septage when the material remains on the land surface for four months or longer prior to incorporation into the soil.
 - c. Food crops with harvested parts below the surface of the land must not be harvested for at least 38 months after application of domestic septage when the material remains on the land surface for less than four months prior to the incorporation into the soil.
 - d. Food crops (when grown and harvested in a manner that prevents any part of the crop from contacting the soil or domestic septage), feed crops, and fiber crops must not be harvested for at least 30 days after application of domestic septage.

- e. Animals must not be allowed to graze on the land for at least 30 days after application of domestic septage.
- f. Public access to land with a high potential for public exposure must be restricted for at least one year after application of domestic septage.
- g. Public access to land with a low potential for public exposure must be restricted for at least 30 days after application of the domestic septage.

F. Vector Attraction Reduction Requirement:

Domestic septage must demonstrate vector attraction compliance by meeting one of the following compliance alternatives:

1. Alkali addition is a compliance alternative [30 TAC §312.83(b)(6)]. If this option is selected, the pH of the domestic septage must be raised to 12 or higher by alkali addition and, without the addition of more alkali, shall remain at 12 or higher for 30 minutes.
2. Domestic septage may be injected below the surface of the land [30 TAC §312.83(b)(9)]. If this alternative is used, no significant amount of the domestic septage can be present on the land surface within one hour after injection.
3. Incorporation into the soil is another compliance alternative [30 TAC §312.83(b)(10)]. If this option is used, domestic septage applied to the surface must be incorporated into the soil within six hours after application to the surface of the land.

G. Soil Sampling and Analysis:

The registrant is required to notify the local TCEQ Regional Office 48 hours prior to taking annual soil samples at the registered site. Samples will need to be taken within the same 45-day period each year, or by an approved sampling plan and analyzed within 30 days of procurement.

The registrant must monitor the soil-septage mixture for the site as follows using soil sampling requirements described in 30 TAC §312.12(b)(1)(I) and (J). Analytical results must be provided on a dry weight basis. The Soil Sampling and Analysis plan shall be provided to the analytical laboratory prior to sample analysis.

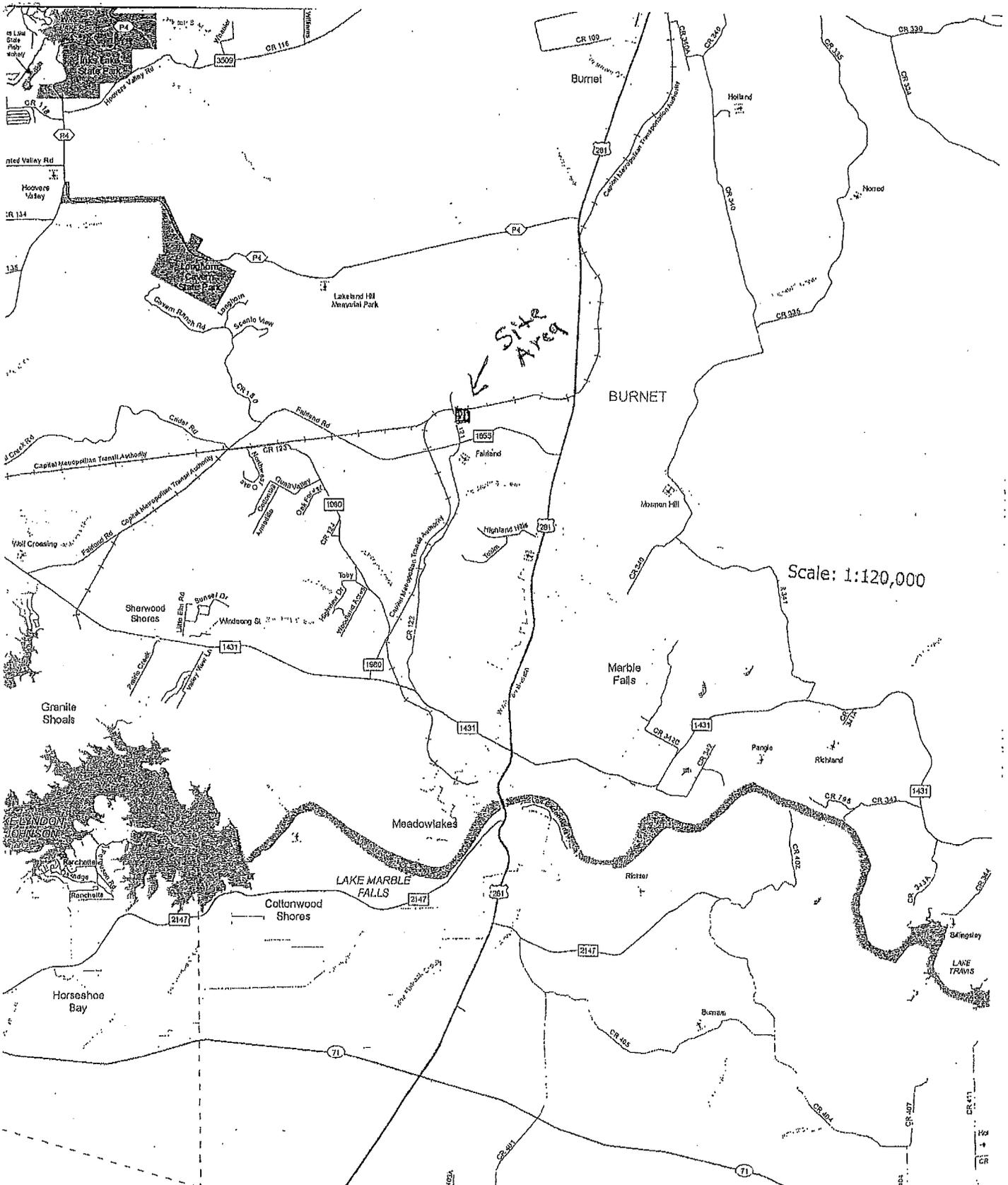
No.	PARAMETER	NOTE	FREQUENCY	SAMPLE DEPTH	
				0" - 6"	6" - 24"
1.	Nitrate Nitrogen (NO ₃ -N, mg/kg)	1	1 per year	X	X
2.	Ammonium Nitrogen (NH ₄ -N,	1	1 per year	X	X
3.	Total Nitrogen (TKN, mg/kg)	2	1 per year	X	X
4.	Phosphorus (plant available, mg/kg)	3	1 per year	X	X
5.	Potassium (plant available, mg/kg)	3	1 per year	X	X
6.	Sodium (plant available, mg/kg)	3	1 per year	X	X
7.	Magnesium (plant available, mg/kg)	3	1 per year	X	X
8.	Calcium (plant available, mg/kg)	3	1 per year	X	X
9.	Electrical Conductivity	4	1 per year	X	X
10.	Soil Water pH (S.U.)	5	1 per year	X	X
11.	Total Arsenic (mg/kg)	6	1 per 5 years	X	N/A
12.	Total Cadmium (mg/kg)	6	1 per 5 years	X	N/A
13.	Total Chromium (mg/kg)	6	1 per 5 years	X	N/A
14.	Total Copper (mg/kg)	6	1 per 5 years	X	N/A
15.	Total Lead (mg/kg)	6	1 per 5 years	X	N/A
16.	Total Mercury (mg/kg)	6	1 per 5 years	X	N/A
17.	Total Molybdenum (mg/kg)	6	1 per 5 years	X	N/A
18.	Total Nickel (mg/kg)	6	1 per 5 years	X	N/A
19.	Total Selenium (mg/kg)	6	1 per 5 years	X	N/A
20.	Total Zinc (mg/kg)	6	1 per 5 years	X	N/A

1. Determined in a 1 N KCl soil extract (<http://soiltesting.tamu.edu/webpages/swflmethods1209.html>).
2. Determined by Kjeldahl digestion or an equivalent accepted procedure. Methods that rely on Mercury as a catalyst are not acceptable.
3. Mehlich III extraction (yields plant-available concentrations) with inductively coupled plasma.
4. Electrical Conductivity (EC) - determined from extract of 2:1 (volume/volume) water/soil mixture and expressed in dS/m (same as mmho/cm).
5. Soil pH must be analyzed by the electrometric method in "Test Methods for Evaluating Solid Waste," EPA SW-846, 40 CFR 260.11; method 9045C - determined from extract of 2:1 (volume/volume) water/soil mixture.
6. Analysis for metals in soil must be performed according to methods outlined in "Test Methods for Evaluating Solid Waste," EPA SW-846; method 3050.

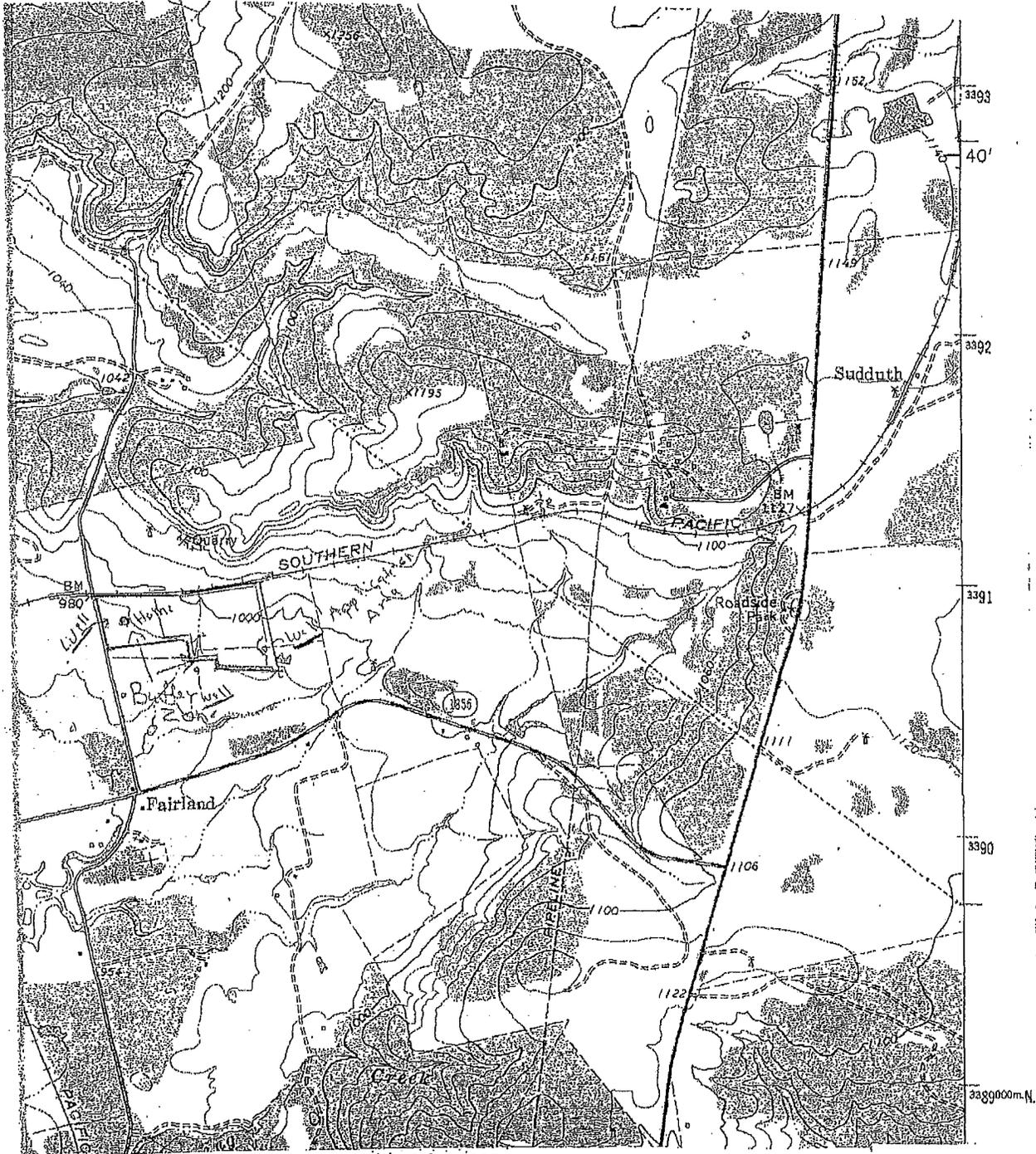
VI. Special Provisions:

- A. Annual domestic septage application rate shall not exceed 122,308 gallons/acre/year at this site.
- B. The registrant shall perform periodic visual inspections and remove any debris on the site after application of domestic septage to the land.
- C. The registrant shall comply with 30 TAC §312 and any best management practices proposed in the registration application, including buffer requirements of 30 TAC §312.44(c) and groundwater and surface water protection requirements of 30 TAC §312.44(g) and (h).
- D. Permanent markers shall be installed to indicate required buffers from all surface water features. An elevation survey of the area, aerial photographs of the area, or other resources may be used to determine the outline of the buffered areas.
- E. All septage staging areas shall be located outside of buffers required by 30 TAC §312.44(c).
- F. Cultural practices shall be used to promote and maintain the health and propagation of the bermudagrass and ryegrass crops at the site and prevent plant lodging.

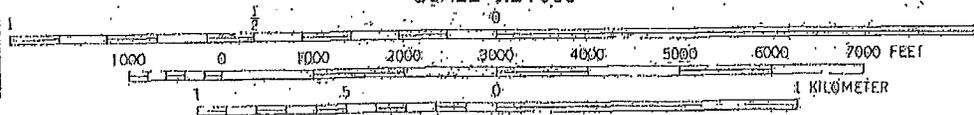
Attachment A General Highway Map



Attachment B
USGS Topographic Map
(1 of 2)



SCALE 1:24 000



CONTOUR INTERVAL 20 FEET
DATUM IS MEAN SEA LEVEL

1669

7701 5710000m E
MARBLE FALLS, TEX. 14311 3.2 MI. V
JOHNSON, CITY 26 MI.

INTERIOR GEOLOGICAL SURVEY WASHINGTON, D. C. 20508
7710000m E

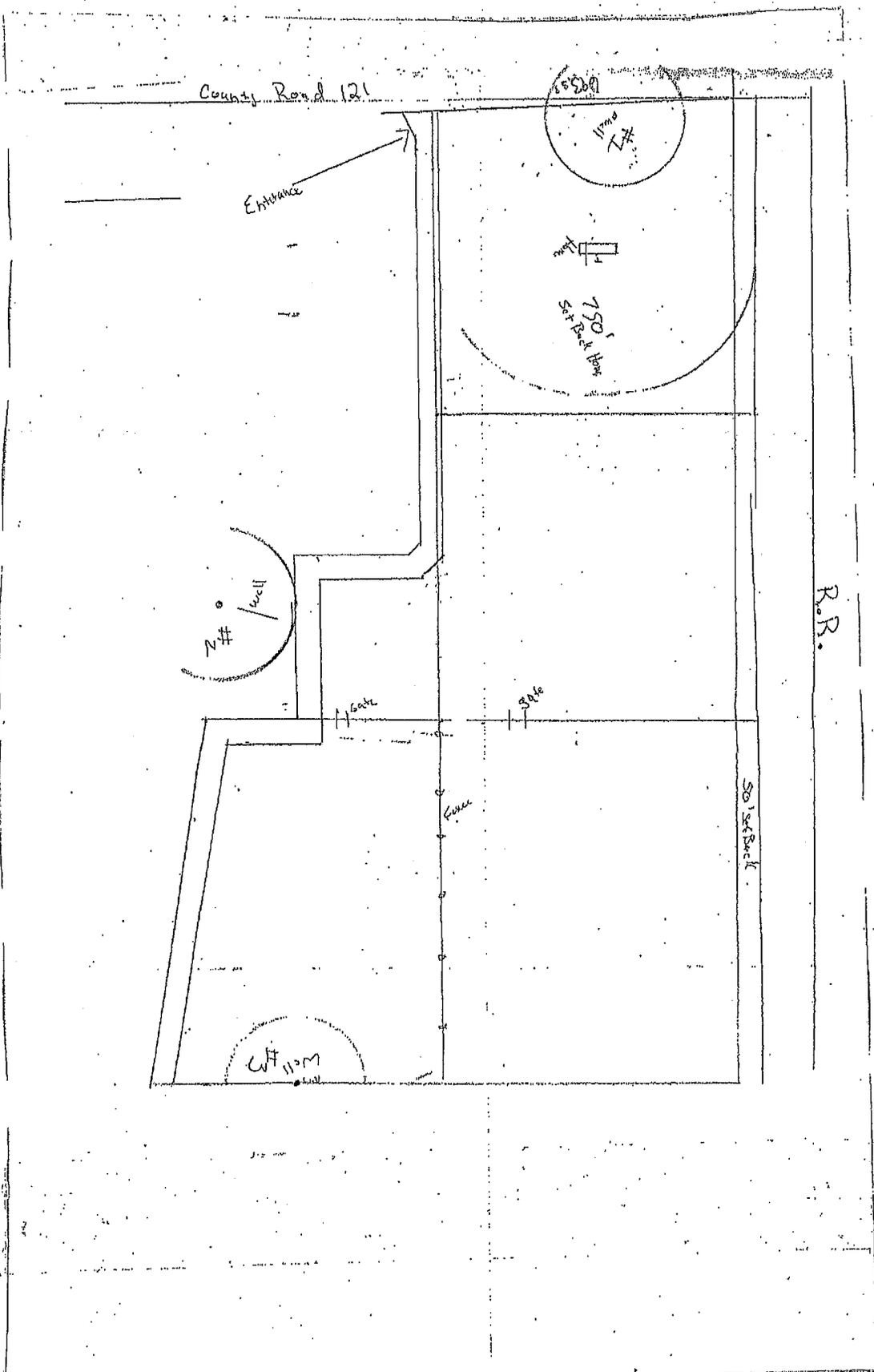
QUADRANGLE LOCATION

30° 3' 15"
98° 15'

ROAD CLASSIFICATION

(SW)

Attachment B
USGS Topographic Map
(2 of 2)



Attachment C

Annual Sludge Summary Report Form

(Domestic Septage Only)

Note 1: Please note that in addition to this summary form, you need submit the information required per 30 TAC 312.48.

Note 2: Please place this form at the top of your Annual Sludge Report.

Note 3. If you operate other registered/permitted site, then fill-out this form for each one of those sites.

Note 4: Also send one complete copy of your report and this form to local TCEQ regional office.

For TCEQ Fiscal Year	Reporting period:	From September 1,	to August 31,
Registration No:	Date		
Name of Registrant:	_____		
Mailing Address:	_____ _____		
Contact Person	Name	Telephone No:	

- a. Treated Domestic Septage: Land _____ gallons / year Applied: _____
- b. Acreage used for Sludge Application/disposal at _____ acres this site: _____
- c. Site Vegetation (such as grass type etc) and # of _____
- d. cuttings: _____
Annual septage application rate authorized by registration to meet annual nitrogen requirement of crop/vegetation: _____
- e. Description of the process used to achieve pathogen requirements in 30 TAC §312.82 (c): _____
- f. Description of the process used to meet the vector attraction reduction requirements in 30 TAC§312.83(b)(9),(10), or (12): _____
- g. Have you enclosed the certification statement? Yes No
- h. Have enclosed dates and times of septage land application to this site? Yes No
- i. Have enclosed the recent soil-septage analysis? Yes No

PLEASE MAIL THE COMPLETED ANNUAL REPORT TO:

Texas Commission on Environmental Quality
Municipal Permits Team (MC 148)
Wastewater Permitting Section
P.O. Box 13087
Austin, TX 78711-3087