

To TCEQ Water Quality staff,

LCRA participated in the proposed rulemaking stakeholder meeting for project No. 2016-033-PET-NR on August 9, 2016 and is supportive of the rulemaking effort to allow optional means for permittees with Texas Land Application Permits (TLAP) to receive reductions in storage and/or irrigable acreage when they can demonstrate firm volumes of reclaimed water that can be beneficially reused thereby reducing total volume of their water balance for determining dedicated TLAP disposal and storage requirements.

This concept proposed by the City of Austin rulemaking petition would allow voluntary and optional means for capital investment to go towards beneficial reuse infrastructure instead of TLAP disposal infrastructure that may ultimately not be needed or used. Beneficial reuse, especially in environmentally sensitive areas or areas with prohibitions on pollutant discharges, may relieve the burden for expansion of redundant disposal and storage facilities while supporting water conservation and reducing consumption of potable water supplies for non-potable uses.

Firm demand for beneficial reuse volumes could be demonstrated by historic use for permittees that already have records for existing 210 uses. Additional allowances should be given for volumes that can be guaranteed through contractual obligations from end users that the TLAP permittee can reasonably include with adequate assumptions and realistic conditions based on type of use and data typically incorporated into water balance demonstrations.

Additionally, storage that is contractually available to the TLAP permittee by 210 reclaimed water end-users should be considered as part of the overall storage for the TLAP system and be credited for volume reduction in the overall water balance to determine storage requirements at the TLAP facility. A distributed system of storage would allow reclaimed water to be stored at the site of the end user, thereby reducing the storage requirements at the TLAP facility. This would assist TLAP permittees that need to expand their WWTF treatment capacity by not requiring an amended expansion of their onsite storage facility. The distributed storage facilities at the end-user locations should conform to all 210 requirements and be contractually obligated solely for effluent storage prior to beneficial reuse, with no comingling of stormwater or water from other sources to ensure the full capacity is available for effluent storage at all times.

Thank you for your consideration in this matter. Please contact me if you have any questions or need additional information.

Sincerely,

Susan Meckel

Lower Colorado River Authority | Water Quality Coordinator

3700 Lake Austin Blvd. - Austin TX 78703

O 512-578-2450 **F** 512-473-3379 **M** 512-922-5738

susan.meckel@lcra.org