

**TCEQ DOCKET NUMBER 2022-1046-MWD**

<b>APPLICATION BY</b>	<b>§</b>	<b>BEFORE THE</b>
<b>RATTLER RIDGE, LLC FOR</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>NEW TPDES PERMIT</b>	<b>§</b>	<b>ENVIRONMENTAL</b>
<b>NO. WQ0016049001</b>	<b>§</b>	<b>QUALITY</b>

**EXECUTIVE DIRECTOR’S RESPONSE TO HEARING REQUESTS**

**I. INTRODUCTION**

The Executive Director (ED) of the Texas Commission on Environmental Quality (commission or TCEQ) files this Response to Hearing Requests on the application by Rattler Ridge, LLC (Applicant) for new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0016049001 (the permit), authorizing the discharge of treated domestic wastewater at a daily average flow limit of 0.1/ 0.2/ 0.4 million gallons per day (MGD) in the Interim I/ Interim II/ Final phases, respectively, from the Rattler Ridge Wastewater Treatment Facility (proposed facility). The City of San Marcos (San Marcos) filed timely a Contested Case Hearing request (request).

**II. ATTACHMENTS FOR COMMISSION CONSIDERATION**

- Attachment A - ED's GIS Maps (2)

**III. DESCRIPTION OF FACILITY AND RECEIVING STREAMS**

If the permit is ultimately issued, the proposed facility will serve the Rattler Ridge subdivision and will be located approximately 7,656 feet southeast of the intersection of Farm-to-Market Road 1978 and State Highway 123, in Guadalupe County, Texas 78666.

When constructed, the proposed facility will be an activated sludge process plant operated in the extended aeration mode. Treatment units common across all phases include a bar screen and tertiary filters. Interim I phase-specific treatment units include an aeration basin, a final clarifier, an aerobic sludge digester, and a chlorine contact chamber. Interim II phase-specific treatment units include a flow splitter, two aeration basins, two final clarifiers, two aerobic sludge digesters, and two chlorine contact chambers. Final phase-specific treatment units include a flow splitter, three aeration basins, three final clarifiers, three aerobic sludge digesters, and three chlorine contact chambers.

The treated effluent will be discharged to an onsite pond where it will continue to an unnamed tributary, then to Long Creek, then to an unnamed impoundment, then back to Long Creek, then to York Creek, and finally to the Lower San Marcos River in Segment No. 1808 of the Guadalupe River Basin.

Because the discharge is directly to an unclassified water body, this permitting action was reviewed in conformity with the 2018 Texas Surface Water Quality Standards (TSWQS), found in Title 30 of the Texas Administrative Code(30 TAC), sections (§§) 307.4(h) and (l), and the TCEQ's *Procedures to Implement the Texas Surface Water Quality Standards-June 2010 (IPs)*. Based on a receiving water assessment and other available information, a preliminary determination of the aquatic life uses around the area of the discharge’s impact has been performed and the

corresponding Dissolved Oxygen (**DO**) criterion assigned as stipulated in the TSWQS (30 TAC § 307.5) and the IPs.

The unclassified receiving water uses are limited aquatic life use for the onsite pond, the unnamed tributary, and Long Creek (all 3.0 mg/L DO), and high aquatic life use for the unnamed reservoir (5.0 mg/L DO). The designated uses for Segment No. 1808 are primary contact recreation, public water supply, and high aquatic life use. Segment No. 1808 is not currently listed on the state's inventory of impaired and threatened waters (the 2020 CWA § 303(d) list).

In accordance with the TSWQS (30 TAC § 307.5), and the IPs, an antidegradation review of the receiving waters was performed. The Tier 1 antidegradation review preliminarily determined that existing water quality uses will not be impaired by this permitting action and that numerical and narrative criteria to protect existing uses will be maintained. The Tier 2 review preliminarily determined that no significant degradation of water quality is expected in the unnamed reservoir, which was identified as having high aquatic life use, and that existing uses will be maintained and protected. However, if new information is received, these determinations can be reexamined or modified.

Additionally, the permit's water quality-related effluent limitations (limits) will maintain and protect the existing instream uses, and for the conventional effluent parameters such as Minimum Dissolved Oxygen (**DO**), Five-day Carbonaceous Biochemical Oxygen Demand (**CBOD5**), Total Suspended Solids (**TSS**), and Ammonia Nitrogen (**NH3-N**), the limits are based on stream standards and waste load allocations for water quality-limited streams as established in the TSWQS and Texas' Water Quality Management Plan. The permit's effluent limits and conditions meet requirements for secondary treatment and disinfection according to 30 TAC Chapter 309 (Subchapter A: Effluent Limits) and comply with the TSWQS (30 TAC §§ 307.1-.10, *eff.* 7/22/2010), and the United States Environmental Protection Agency (**USEPA**)-approved portions of the TSWQS (*eff.* 3/6/2014). In a case such as this, end-of-pipe compliance with pH limits between

6.0 and 9.0 standard units reasonably assures instream compliance with the TSWQS for pH when the discharge authorized is from a minor facility and the unclassified waterbodies have minimal or limited aquatic life uses. This technology-based approach reasonably assures instream compliance with TSWQS criteria due to the smaller discharge volumes authorized by these permits. This conservative approach is based on TCEQ sampling throughout Texas indicating that instream buffering quickly restores pH levels to ambient conditions.

Based on water quality modeling results from an "uncalibrated QUAL-TX" model, for all effluent flow phases (0.10, 0.20, and 0.40 MGD) an effluent limit set of 10.0 mg/L CBOD5, 2.0 mg/L NH3-N, and 5.0 mg/L DO is predicted to ensure that DO will be maintained above the criterion established by the Standards Implementation Team within the ED's Water Quality Division (WQD staff) for the unnamed tributary and the on-site pond (both 3.0 mg/L DO).

Coefficients and kinetics used in the model are a combination of site specific, standardized default, and estimated values. The results of this evaluation can be reexamined upon receipt of information that conflicts with the assumptions employed in this analysis. Based on the total phosphorus screening, a 0.5 mg/L Total Phosphorus

(TP) limit is recommended for all phases of the permit to preclude eutrophication in instream pools within the unnamed tributary, Long Creek, and the unnamed reservoir.

The permit's entire set of water quality limits, based on a 30-day average, are 10/15/2.0 mg/L, CBOD5/TSS/NH3-N, respectively, 0.5 mg/L TP, and a bacteria limit of 126 colony forming units (CFU) or most probable number (MPN) of *E. coli* per 100 ml. The permit's disinfection requirements are that the Applicant use Chlorine. Specifically, the treated effluent must contain a total chlorine residual of at least 1.0 mg/l and must not exceed a total chlorine residual of 4.0 mg/l after a detention time of at least 20 minutes (based on peak flow) and must be monitored five times per week by grab sample. An equivalent method of disinfection may be substituted only with prior approval of the ED.

The proposed discharge is not expected to impact any federal endangered or threatened aquatic or aquatic-dependent species or proposed species or their critical habitat, as no priority watershed of critical concern has been identified in Segment 1808. This determination is based on the United States Fish and Wildlife Service's (USFWS) biological opinion on the State of Texas authorization for the Texas Pollutant Discharge Elimination System (September 14, 1998, October 21, 1998, update). To make this determination for TPDES permits, TCEQ and EPA only consider aquatic or aquatic dependent species occurring in watersheds of critical concern or high priority as listed in Appendix A of the USFWS biological opinion. The permit does not require EPA review with respect to the presence of endangered or threatened species. This determination is subject to reevaluation due to subsequent updates or amendments to the biological opinion.

#### **IV. PROCEDURAL BACKGROUND**

The TCEQ received the application on October 1, 2021, and declared it administratively complete on December 2, 2021. The Applicant published the Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) in English in Guadalupe County, Texas in the *San Marcos Daily Record* on December 8, 2021, and in Spanish in *El Mundo* on December 9, 2021. The ED completed the technical review of the application on February 23, 2022, and prepared the permit, which if approved, would establish the conditions under which the proposed facility must operate. The Applicant published the Notice of Application and Preliminary Decision (NAPD) in English in Guadalupe County, Texas in the *San Marcos Daily Record* on March 31, 2022, and in Spanish in *El Mundo* on March 31, 2022. The public comment period ended on May 2, 2022. Because this application was received after September 1, 2015, and because it was declared administratively complete after September 1, 1999, it is subject to both the procedural requirements adopted pursuant to House Bill 801, 76th Legislature, 1999, (HB 801) and the procedural requirements of and rules implementing Senate Bill 709, 84<sup>th</sup> Legislature, 2015, (SB 709) both implemented by the TCEQ in its rules in 30 Texas Administrative Code (30 TAC) Chapters 39, 50, and 55. The Texas Legislature enacted Senate Bill 709, effective September 1, 2015, amending the requirements for comments and contested case hearings.

#### **V. EVALUATION OF HEARING REQUESTS**

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public

comment and the Commission's consideration of hearing requests (Requests). The Commission implemented HB 801 by adopting procedural rules in 30 TAC chapters 39, 50, and 55. Senate Bill 709 revised the requirements for submitting public comment and the commission's consideration of Requests. This application was declared administratively complete on December 2, 2022; therefore, it is subject to the procedural requirements adopted pursuant to both HB 801 and SB 709.

**A. Legal Authority To Respond To Hearing Requests**

The ED may submit written responses to requests.<sup>1</sup> Responses to hearing requests must specifically address:

1. whether the requestor is an affected person;
2. whether issues raised in the hearing request are disputed;
3. whether the dispute involves questions of fact or law;
4. whether the issues were raised during the public comment period;
5. whether the hearing request is based on issues raised [only] in a [ ] comment withdrawn by the commenter by filing a written withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment;
6. whether the issues are relevant and material to the decision on the application; and
7. a maximum expected duration for the contested case hearing.<sup>2</sup>

**B. Hearing Request Requirements**

To consider a Request, the Commission must first conclude that the requirements in 30 TAC §§ 55.201 and 55.203, are met as follows.

A request for a contested case hearing by an affected person must be in writing, filed with the chief clerk within the time provided . . ., based only on the requester's timely comments, and not based on an issue that was raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment.<sup>3</sup>

A hearing request must substantially comply with the following:

- (1) give the name, address, telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who is responsible for receiving all official communications and documents for the group;
- (2) identify the person's justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the facility or activity that is the subject of the application and how and why the requestor believes he or

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<sup>1</sup> 30 TAC § 55.209(d).

<sup>2</sup> *Id.* at § 55.209(e).

<sup>3</sup> 30 TAC § 55.201(c).

she will be adversely affected by the facility or activity in a manner not common to members of the general public;

- (3) request a contested case hearing
- (4) for applications filed:

(B) on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, list any disputed issues of law; and

- (5) provide any other information specified in the public notice of application.<sup>4</sup>

### C. Requirement that Requestor be an Affected Person

To grant a contested case hearing, the commission must determine, pursuant to 30 TAC § 55.203, that a requestor is an affected person.

- (a) For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the public does not qualify as a personal justiciable interest.
- (b) Governmental entities, including local governments and public agencies with authority under state law over issues raised by the application may be considered affected persons.
- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
  - (1) whether the interest claimed is one protected by the law under which the application will be considered;
  - (2) distance restrictions or other limitations imposed by law on the affected interest;
  - (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
  - (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
  - (5) likely impact of the regulated activity on use of the impacted natural resource by the person; and
  - (6) whether the requester timely submitted comments on the application which were not withdrawn; and
  - (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.<sup>5</sup>

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<sup>4</sup> *Id.* at § 55.201(d).

<sup>5</sup> 30 TAC § 55.203(a)-(c).

- (d) In making this determination, the commission may also consider, to the extent consistent with case law:
- (1) the merits of the underlying application and supporting documentation in the commission's administrative record, including whether the application meets the requirements for permit issuance;
  - (2) the analysis and opinions of the ED; and
  - (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.<sup>6</sup>

**D. Referral to the State Office of Administrative Hearings**

“When the commission grants a request for a contested case hearing, the commission shall issue an order specifying the number and scope of the issues to be referred to State Office of Administrative Hearing (SOAH) for a hearing.”<sup>7</sup> The commission may not refer an issue to SOAH for a contested case hearing unless the commission determines that the issue:

- (1) involves a disputed question of fact or a mixed question of law and fact;
- (2) was raised during the public comment period by an affected person; and
- (3) is relevant and material to the decision on the application.<sup>8</sup>”

**VI. ANALYSIS OF THE HEARING REQUESTS**

For this permit application the relevant public comment period ended on May 2, 2022, and the period for filing a Request for Reconsideration or a Request ended on February 22, 2022. The ED's analyses determined whether the Requests followed TCEQ rules, if San Marcos qualified as an affected person, what issues may be referred for a possible hearing, and the length of that hearing.

**A. Whether The Request Complied With 30 Tac §§ 55.201(C) And (D).**

**1. San Marcos** filed five substantially similar, timely, written Requests that provided the requisite contact information, raised issues that form the basis of the Requests in timely comments not withdrawn before the RTC was filed, and requested a hearing.

San Marcos' Requests complied with 30 TAC §§ 55.201(c), and (d) because they effectively identified a personal justiciable interest in a written explanation plainly describing why it believes it will be affected by the application in a way not common to the public. San Marcos' Requests stated that the proposed facility will be within its Extra Territorial Jurisdiction (ETJ) and raised relevant issues to a decision on the application.

The ED recommends finding that San Marcos' Requests substantially complied with 30 TAC §§ 55.201(c) and (d).

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<sup>6</sup> *Id.* at § 55.203(d).

<sup>7</sup> 30 TAC § 50.115(b).

<sup>8</sup> *Id.* at § 50.115(c).

**B. Whether Requestor Is An Affected Person Under 30 Tac § 55.203.**

**1. San Marcos** – Filed Requests that effectively identified a personal, justiciable interest affected by the application because the Requests stated that the proposed facility will be located within its ETJ limits; and according to the GIS map prepared by the ED’s staff, the proposed facility, while not within the San Marcos’ incorporated limits, is within the limits of San Marcos’ ETJ, which increases the likelihood that San Marcos will be affected in a way not common to the public. This is also because San Marcos’ Requests raised relevant issues to a decision on the application, including but not limited to, whether the permit will allow nuisance odors from the proposed facility, whether surface and groundwater quality will be protected in accordance with the TSWQS, whether the Applicant’s Operator is qualified to run the proposed facility, and whether the proposed facility and permit comply with the requirements for “need” in TWC Sec. 26.0282 and Texas’ regionalization policy. Those issues all relate to statutory interests granted to municipalities and wastewater treatment providers by state law.

Pursuant to Texas Local Gov’t Code § 42.001, the purpose of a municipality’s ETJ is so that the municipality can promote and protect the general health, safety, and welfare of residents within it. Surface and groundwater quality being protected within San Marcos’ ETJ according to state law, and a qualified operator running the proposed facility so spills and malfunctions can be prevented, are issues related to San Marcos’ interest in promoting and protecting the general health, safety, and welfare of persons residing in its ETJ. This highlights that a reasonable relationship exists between the interest claimed and the activity regulated.

Additionally, Chapter 217 of the Local Gov’t Code gives all municipalities the powers to abate and regulate nuisances and ensuring that the proposed permit addresses the prevention of nuisance odors, demonstrates San Marcos’ interest and the possibility San Marcos may suffer adverse effects by this application, not common to the public.

Pursuant to the TWC, the development and use of regional and area-wide wastewater systems is encouraged and promoted (TWC § 26.081(a)). In furtherance of that goal, *the commission may deny or alter the terms and conditions of a permit based on consideration of factors, including but not limited to “Need,” and the availability of existing or proposed areawide or regional wastewater systems not designated by commission order pursuant to TWC § 26.081(a)* (TWC § 26.0282). San Marcos, as a wastewater treatment provider, has an interest in the application demonstrating the need for the proposed facility and the correct implementation of TCEQ’s Regionalization policy, within its ETJ.

San Marcos’ Requests raised relevant issues to the application, explained briefly and specifically, in plain language, San Marcos’ ETJ limits relative to the proposed facility and how and why San Marcos might be adversely affected by the proposed facility in a manner not common to the public.

The ED recommends that the Commission find that San Marcos is an Affected Person under 30 TAC § 55.203.

### **C. Whether The Issues Are Referable To SOAH**

In addition to recommending to the Commission those persons who qualify as affected persons, the ED analyzes issues raised in accordance with regulatory criteria. Unless otherwise noted, the issues discussed below are considered relevant, disputed, and were raised during the public comment period and addressed in the ED's RTC. None of the issues were raised solely in a comment which has been withdrawn. For applications submitted on or after September 1, 2015, only those issues raised in a timely comment by a requester whose request is granted may be referred.<sup>9</sup>

### **D. Issues raised in the Hearing Request:**

The following issues were raised in San Marcos' Requests:

#### **1. Whether the proposed discharge will violate TCEQ's antidegradation policy and procedures.**

(RTC Response No. 4) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes that this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

#### **2. Whether the proposed discharge negatively will impact livestock or aquatic or terrestrial wildlife.**

(RTC Response No. 4) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes that this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

#### **3. Whether the permit will protect human health and the environment.**

(RTC Response No. 4) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

#### **4. Whether the permit will be protective of surface and groundwater quality.**

(RTC Response Nos. 4 and 5) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

#### **5. Whether the permit will ensure no impairment of the existing uses of the discharge route.**

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<sup>9</sup> TX. GOV'T CODE § 2003.047(e-1); 30 TAC § 55.211 (c)(2)(A)(ii).  
Executive Director's Response to Hearing Requests  
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(RTC Response No. 4) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

**6. Whether the Applicant's compliance history for the last five years raises issues regarding the Applicant's ability to comply with the material terms of the permit.**

(RTC Response No. 10) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

**7. Whether the permit and proposed facility violate the TCEQ's regionalization policy, and whether the requirements in TWC Sec. 26.0282 for "need" have been met.**

(RTC Response No. 11) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

**8. Whether the permit's nuisance odor control complies with TCEQ rules.**

(RTC Response No. 7) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

**9. Whether the application is complete and provides truthful information upon which the Commission can rely.**

(RTC Response No. 12) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

**10. Whether the permit's operator requirements comply with the TCEQ rules.**

(RTC Response No. 8) This is an issue of fact. If it can be shown that this issue is factually accurate, that information would be relevant and material to a decision on the application. This is an issue of fact that is not relevant and material to a decision on the application. If the Applicant's operator does not have the requisite qualifications to operate the proposed facility, would be a permit violation as that is a term of the permit.

The ED concludes this issue is relevant and material and should the Commission refer this case to SOAH, the ED recommends referring this issue.

**VII. REQUESTS FOR RECONSIDERATION**

The ED received three Requests for Reconsideration (RFR) from San Marcos on this application that did not raise any new information for the ED to consider.

**VIII. CONTESTED CASE HEARING DURATION**

If the Commission grants a hearing on this application, the ED recommends that the duration of the hearing be 180 days from the preliminary hearing to the presentation of a proposal for decision to the Commission.

**IX. EXECUTIVE DIRECTOR'S RECOMMENDATION**

The ED recommends the following actions by the Commission:

1. Find that San Marcos is an Affected Person under 30 TAC § 55.203.
2. Grant the Requests of San Marcos.
3. Deny the Requests for Reconsideration filed by San Marcos.
4. Should the Commission decide to refer this case to SOAH:
  - a. refer the case to Alternative Dispute Resolution for a reasonable time, and
  - b. refer the identified issues above in section (C)(1)-(10) to SOAH for a contested case hearing.

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker, Executive Director

Charmaine Backens, Deputy Director



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REPRESENTING THE ED OF THE TEXAS  
COMMISSION ON ENVIRONMENTAL QUALITY

**X. CERTIFICATE OF SERVICE**

I certify that on September 12, 2022, true and correct copies of the Executive Director's Response to Hearing Requests on the application by Rattler Ridge, LLC for new TPDES Permit No. WQ0016049001, was filed with the TCEQ's Chief Clerk and a copy was served to all persons listed on the mailing list below via hand delivery, electronic delivery, inter-agency mail, or by deposit in the U.S. Mail.



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Michael T. Parr II, Staff Attorney  
Environmental Law Division  
State Bar No. 24062936

**XI. MAILING LIST**

**FOR THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

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# Attachment A

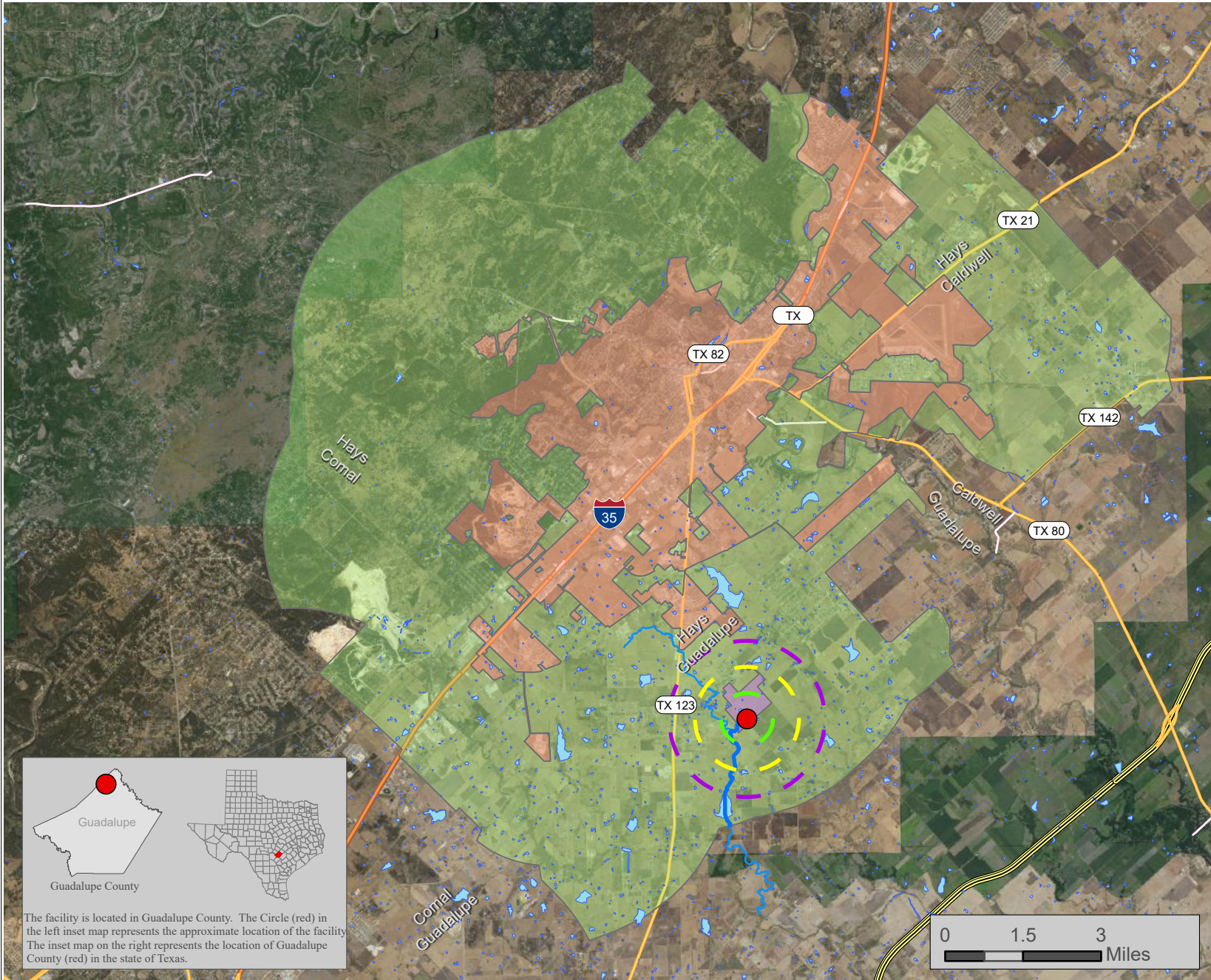
# Rattler Ridge LLC

Map Requested by TCEQ Office of Legal Services  
for Commissioners' Agenda

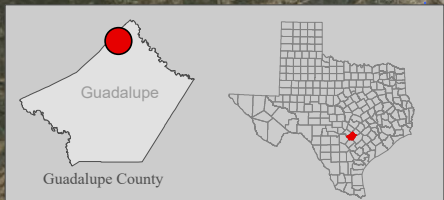


*Protecting Texas by  
Reducing and  
Preventing Pollution*

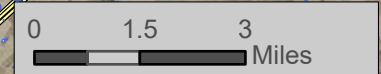
Texas Commission on Environmental Quality  
GIS Team (Mail Code 197)  
P.O. Box 13087  
Austin, Texas 78711-3087  
Date: 8/31/2022  
CRF 0076975  
Cartographer: alortiz



- Facility and Outfall
- - - 0.5 Mile from Facility
- - - 1 Mile from Facility
- - - 1.5 Miles from Facility
- Facility Property
- San Marcos Municipality
- San Marcos ETJ
- Lake/Pond
- County Boundary
- 2 Miles Discharge Route
- Long Creek



The facility is located in Guadalupe County. The Circle (red) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Guadalupe County (red) in the state of Texas.



Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.

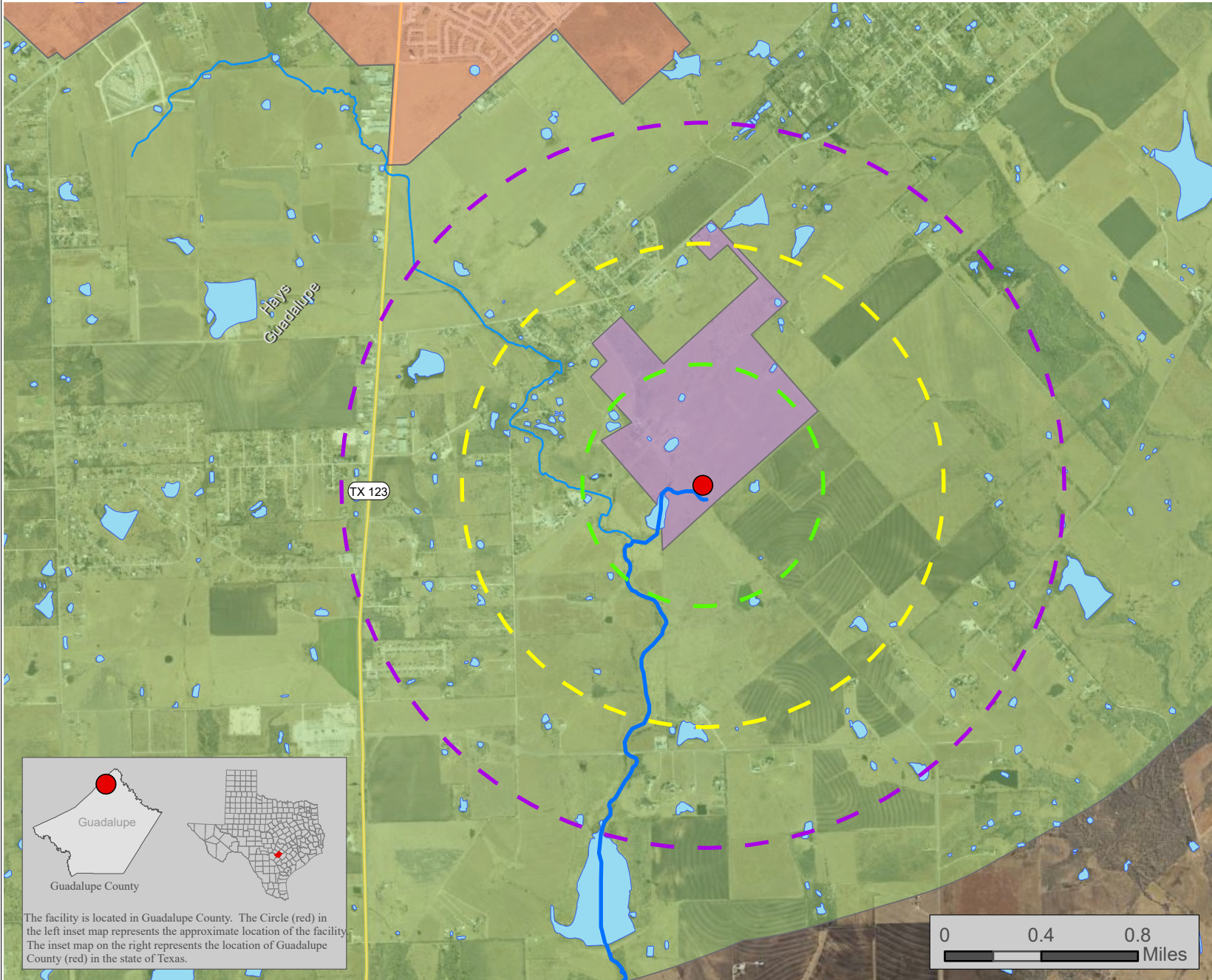
# Rattler Ridge LLC

Map Requested by TCEQ Office of Legal Services  
for Commissioners' Agenda

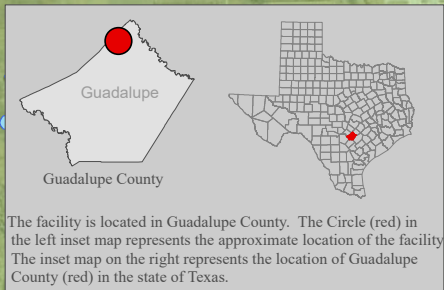


*Protecting Texas by  
Reducing and  
Preventing Pollution*

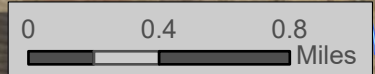
Texas Commission on Environmental Quality  
GIS Team (Mail Code 197)  
P.O. Box 13087  
Austin, Texas 78711-3087  
Date: 8/31/2022  
CRF 0076975  
Cartographer: alortiz



- Facility and Outfall
- 0.5 Mile from Facility
- 1 Mile from Facility
- 1.5 Miles from Facility
- Facility Property
- San Marcos Municipality
- San Marcos ETJ
- Lake/Pond
- County Boundary
- 2 Miles Discharge Route
- Long Creek



The facility is located in Guadalupe County. The Circle (red) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Guadalupe County (red) in the state of Texas.



Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

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