

TCEQ DOCKET NO. 2022-1155-MWD

APPLICATION BY GRAM VIKAS	§	BEFORE THE TEXAS
PARTNERS INC. FOR TPDES	§	COMMISSION ON
PERMIT NO. WQ0015990001	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR’S RESPONSE TO HEARING REQUESTS

The Executive Director (ED) of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Hearing Requests (Response) on the application by Gram Vikas Partners Inc. (Applicant), for new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0015990001 and on the ED’s preliminary decision. The Office of the Chief Clerk receiving hearing requests from Bryon Evans, Mary Allen, Patrick Flint, Michael Lingensjo, Rita Lingensjo, Victoria Rose on behalf of Texas Rivers Protection Association (TRPA), David Price on behalf of TRPA, Annalisa Peace on behalf of Greater Edwards Aquifer Alliance (GEAA), and Bill Bunch on behalf of TRPA and GEAA.

Attached for Commission consideration are the following:

Attachment A--- Executive Director’s Satellite Map

I. Description of Facility

The Applicant applied for a new TPDES permit to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 200,000 gallons per day. The facility will be an activated sludge and biological nutrient removal process plant using a membrane bioreactor (MBR) operated with supervisory control and data acquisition control systems. Treatment units in the Interim I phase will include a bar screen, an anoxic basin, a pre-aeration basin, a MBR basin (sludge holding zone and aerobic MBR zone), and a chlorine contact chamber. Treatment units in the Interim II phase will include a bar screen, two anoxic basins, two pre-aeration basins, two MBR basins (sludge holding zone and aerobic MBR zone), and a chlorine contact chamber. Treatment units in the Final phase will include a bar screen, three anoxic basins, three pre-aeration basins, three MBR basins (sludge holding zone and aerobic MBR zone), and a chlorine contact chamber. The facility has not been constructed.

The draft permit authorizes a discharge of treated domestic wastewater at a volume not to exceed a daily average flow of 0.20 MGD. The effluent limitations in all phases of the draft permit, based on a 30-day average, are 5.0 mg/l five-day

carbonaceous biochemical oxygen demand (CBOD₅), 5.0 mg/l total suspended solids (TSS), 2.0 mg/l ammonia-nitrogen (NH₃-N), 0.50 mg/l total phosphorus (TP), 126 colony forming units (CFU) or most probable number (MPN) of *Escherichia coli* (*E. coli*) per 100 ml, and 4.0 mg/l minimum dissolved oxygen (DO). The effluent shall contain a chlorine residual of at least 1.0 mg/l and shall not exceed a chlorine residual of 4.0 mg/l after a detention time of at least 20 minutes based on peak flow.

The wastewater treatment facility (WWTF) will be located approximately 0.3 miles south-southeast of the intersection of Farm-to-Market Road 1101 and Watson Lane, in Comal County, Texas 78130. The treated effluent will be discharged to Mesquite Creek, thence to York Creek, thence to the Lower San Marcos River in Segment No. 1808 of the Guadalupe River Basin. The unclassified receiving water use is limited aquatic life use for Mesquite Creek and York Creek. The designated uses for Segment No. 1808 are primary contact recreation, public water supply, and high aquatic life use. In accordance with 30 TAC § 307.5 and TCEQ's *Procedures to Implement the Texas Surface Water Quality Standards* (June 2010), an antidegradation review of the receiving waters was performed. A Tier 1 antidegradation review has preliminarily determined that existing water quality uses will not be impaired by this permit action. Numerical and narrative criteria to protect existing uses will be maintained. This review has preliminarily determined that no water bodies with exceptional, high, or intermediate aquatic life uses are present within the stream reach assessed; therefore, no Tier 2 degradation determination is required. No significant degradation of water quality is expected in water bodies with exceptional, high, or intermediate aquatic life uses downstream and existing uses will be maintained and protected. The preliminary determination can be reexamined and may be modified if new information is received.

II. Procedural Background

TCEQ received the application for a new TPDES permit on May 10, 2021, and declared it administratively complete on July 26, 2021. The Applicant published the Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) on August 1, 2021, in the *Sequin Gazette*. The application was determined technically complete on October 18, 2021. The Applicant published the Notice of Application and Preliminary Decision (NAPD) on December 5, 2021 in the *Sequin Gazette*. A virtual public meeting

was held on March 21, 2022, and a live, in person, public meeting was held on June 7, 2022. The comment period closed on June 7, 2022.

This application was filed on or after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill 801, 76th Legislature (1999), and Senate Bill 709, 84th Legislature (2015), which are implemented by the Commission in its rules in 30 TAC Chapters 39, 50, and 55.

III. The Evaluation Process for 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. Senate Bill 709 revised the requirements for submitting public comment and the Commission's consideration of hearing requests. The evaluation process for hearing requests is as follows:

A. Response to Requests

The ED, the Public Interest Counsel, and the Applicant may each submit written responses to a hearing request. 30 TAC § 55.209(d).

Responses to hearing requests must specifically address:

- 1) whether the requester is an affected person;
- 2) whether issues raised in the hearing request are disputed;
- 3) whether the dispute involves questions of fact or of law;
- 4) whether the issues were raised during the public comment period;
- 5) whether the hearing request is based on issues 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 RTC;
- 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.

30 TAC § 55.209(e)

B. Hearing Request Requirements

In order for the Commission to consider a hearing request, the Commission must first determine whether the request meets certain requirements:

Affected persons may request a contested case hearing. The request must be made in writing and timely filed with the chief clerk. The request must be based only on the requestor's timely comments, and may not be based on an issue that was raised solely in a public comment that was withdrawn by the requester prior to the filing of the ED's RTC. 30 TAC § 55.201(c).

A hearing request must substantially comply with the following:

- 1) give the time, address, daytime 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 shall be responsible for receiving all official communications and documents for the group;
- 2) identify the person's personal 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 proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- 3) request a contested case hearing;
- 4) list all relevant and material disputed issues of fact that were raised 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 executive director's responses to comments that the requestor disputes and the factual basis of the dispute and list any disputed issues of law; and
- 5) provide any other information specified in the public notice of application. 30 TAC § 55.201(d)

C. Requirement that Requestor be an Affected Person/ “Affected Person” Status

In order to grant a contested case hearing, the Commission must determine that a requestor is an “affected” person. 30 TAC § 55.203 sets out who may be considered 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 general public does not qualify as a personal justiciable interest.
- b) Except as provided by 30 TAC § 55.103, 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;
 - 6) whether the requestor 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.
- d) In making affected person determinations, 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 executive director; and
- 3) any other expert reports, affidavits, opinions, or data submitted by the executive director, the applicant, or hearing requestor.

30 TAC § 55.203

D. Referral to the State Office of Administrative Hearings (SOAH)

“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 SOAH for a hearing.” 30 TAC § 50.115(b). 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 whose hearing request is granted; and
- 3) is relevant and material to the decision on the application.

30 TAC § 50.115(c).

IV. Analysis of the Requests

The Executive Director has analyzed the hearing requests to determine whether they comply with Commission rules, if the requestors qualify as affected persons, what issues may be referred for a contested case hearing, and what is the appropriate length of the hearing.

A. Whether the Requestors Complied with 30 TAC §§ 55.201 (c) and (d)

The Executive Director received timely hearing requests from Bryon Evans, Mary Allen, Patrick Flint, Michael Lingsjo, Rita Lingsjo, Victoria Rose on behalf of Texas Rivers Protection Association (TRPA), David Price on behalf of TRPA, Annalisa Peace on behalf of Greater Edwards Aquifer Alliance (GEAA), and Bill Bunch on behalf of TRPA and GEAA. Each hearing request received complied with 30 TAC § 55.201(c).

The Executive Director concludes that Byron Evans, Mary Allen, Patrick Flint, Michael Lingsjo, Rita Lingsjo, Victoria Rose for TRPA, David Price for TRPA, Annalisa Peace for GEAA, and Bill Bunch for TRPA and GEAA all submitted hearing requests that complied with 30 TAC § 55.201(c).

Hearing requests which meet the requirements of 30 TAC 55.201(d)

Mary Allen and Byron Evans each submitted individual hearing requests on their own behalf. Victoria Rose submitted timely hearing request on behalf of TRPA. David Price submitted a timely hearing request on behalf of TRPA. Bill Bunch submitted a timely hearing request on behalf of TRPA and GEAA. All of the aforementioned hearing requests provided the name, address, and phone number of the person filing the request. They each identify a personal, justiciable interest affected by the application, including a brief explanation of the requestor's location and distance relative to the proposed facility. They each requested a contested case hearing and raised genuine issues of disputed fact in their hearing requests.

The Executive Director concludes that Byron Evans, Mary Allen, Victoria Rose for TRPA, David Price for TRPA, and Bill Bunch for TRPA and GEAA all submitted hearing requests that comply with 30 TAC § 55.201(d).

Hearing requests which do not meet the requirements of 30 TAC 55.201(d)

In their hearing requests Patrick Flint, Michael Lingsjo, and Rita Lingsjo requested a public hearing but did not identify their personal justiciable interest affected by the application, nor did they show how they will be adversely affected by the proposed facility in a manner not common to members of the general public. Annalisa Peace submitted a hearing request on behalf of Greater Edwards Aquifer Alliance. Her request failed to identify one person by name, address, telephone number and did not identify any personal justiciable interest affected by the application showing how they would be adversely affected by the proposed facility in a manner not common to members of the general public.

The Executive Director concludes that the hearing requests filed by Patrick Flint, Michael Lingsjo, Rita Lingsjo, and Annalisa Peace on behalf of Greater Edwards Aquifer Alliance did not comply with 30 TAC § 55.201(d).

B. Whether the hearing request by group or association complied with 30 TAC § 55.205

1) Texas Rivers Protection Association (TRPA)

Bill Bunch, Victoria Rose, and David Price each submitted timely hearing requests on behalf of TRPA.¹ Each hearing request identified TRPA member Charles Pfluger as a downstream landowner with multiple properties within one mile of the facility and within 0.5 miles from the outfall. Mr. Pfluger would otherwise have standing in his own right to request a hearing in his own right.² TRPA raised several issues including surface and groundwater quality concerns, antidegradation, protection of aquatic and terrestrial life, nutrient limits, use and enjoyment of property, nuisance odors, incompleteness and inaccuracy of the application, lack of showing of need for the facility, and regionalization. The hearing requests identified TRPA's mission as being "to protect public access and preserve the flow, water quality, and natural beauty of the rivers in Texas, including the San Marcos and Guadalupe Rivers. TRPA sponsors river clean-ups, engages in public outreach and educates members and the public concerning preservation of water quality in Texas rivers and streams, and participates in wastewater permitting cases." The Executive Director concludes that the interests the group or association seeks to protect are germane to the organization's purpose.³ Neither the claims asserted in the hearing requests, nor the relief requested requires the participation of Mr. Pfluger.⁴

The Executive Director concludes that the Texas Rivers Protection Association satisfied the requirements in 30 TAC § 55.205 for a hearing request by a group or association.

2) Greater Edwards Aquifer Alliance (GEAA)

Bill Bunch submitted a timely hearing request on behalf of GEAA.⁵ His hearing request identified GEAA member Charles Pfluger as a downstream landowner with multiple properties within 1-mile of the facility and within 0.5 miles from the outfall. Mr. Pfluger would otherwise have standing in his own right to request a hearing in his

¹ 30 TAC § 55.205(b)(1).

² 30 TAC § 55.205(b)(2).

³ 30 TAC § 55.205(b)(3).

⁴ 30 TAC § 55.205(b)(4).

⁵ 30 TAC § 55.205(b)(1).

own right.⁶ GEAA raised several issues including surface and groundwater quality concerns, antidegradation, protection of aquatic and terrestrial life, nutrient limits, use and enjoyment of property, nuisance odors, incompleteness and inaccuracy of the application, lack of showing of need for the facility, and regionalization. Their hearing request identified GEAA as being a nonprofit organization that promotes broad-based advocacy for protection and preservation of the Edwards Aquifer, its springs, watersheds, and the Texas Hill County. The Executive Director concludes that the interests the group or association seeks to protect are germane to the organization's purpose.⁷ Neither the claims asserted in the hearing requests, nor the relief requested requires the participation of Mr. Pfluger.⁸

The Executive Director concludes that the Greater Edwards Aquifer Alliance has satisfied the requirements in 30 TAC § 55.205 for a hearing request by a group or association.

C. Whether individual requestors meet affected person requirements

1. Byron Evans

According to the information provided by Byron Evans, he is a landowner near the proposed facility. Mr. Evans resides within 0.5 miles of the proposed facility. His hearing request raised issues relating to water contamination and the effects on human and animal life, which are issues protected by law and are thus referable. Therefore, Mr. Byron Evans has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application not common to members of the general public and is an affected person.

The Executive Director recommends the Commission find that Byron Evans is an affected person.

2. Mary Allen

According to the information provided by Mary Allen, her property is located 1.78 miles from the facility and 1.40 miles from the outfall. Ms. Allen raised concerns about potential nuisance odors and operator compliance, which are issues protected by the law and are thus referable. Due to her distance from the proposed facility however, Ms. Allen has not demonstrated that she has a personal justiciable interest

⁶ 30 TAC § 55.205(b)(2).

⁷ 30 TAC § 55.205(b)(3).

⁸ 30 TAC § 55.205(b)(4).

related to a legal right, duty, privilege, power, or economic interest affected by the application not common to members of the general public.

The Executive Director recommends the Commission find that Mary Allen is not an affected person.

D. Whether Issues Raised are Referable to SOAH for a Contested Case Hearing

The Executive Director has analyzed issues in accordance with the regulatory criteria. The issues were raised by TRPA, GEAA, and Byron Evans. None of the issues were 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. The issues raised for this application and the Executive Director's analysis and recommendations follows.

Issue 1: Whether the draft permit is protective of water quality, groundwater, and uses of the receiving waters, including recreational use, in accordance with the Texas Surface Water Quality Standards. (RTC Response Nos. 2, 26, 30, 32)

- This issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown the draft permit does not provide sufficient controls to protect water quality, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 2: Whether the draft permit includes adequate provisions to protect the health of requesters and their families as well as aquatic and terrestrial wildlife. (RTC Response No. 2 and 30)

- This issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the draft permit does not provide sufficient controls to protect human and animal life, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 3: Whether the draft permit will contribute to flooding. (RTC Response No. 8)

- This is an issue of fact. However, it is not relevant and material to a decision on the application, as TCEQ does not have jurisdiction over flooding relating to wastewater treatment facilities contributing to flooding in the receiving waters. The Executive Director does NOT recommend referring this issue to SOAH.

Issue 4: Whether the draft permit will contribute to erosion. (RTC Response No. 11)

- This is an issue of fact. However, it is not relevant and material to a decision on the application, as TCEQ does not have jurisdiction over erosion relating to wastewater treatment facilities. The Executive Director does NOT recommend referring this issue to SOAH.

Issue 5: Whether the draft permit complies with the TCEQ's rules addressing nuisance odor. (RTC Response No. 3)

- This issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the draft permit does not provide sufficient provisions to protect and abate from nuisance odors, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 6: Whether the draft permit is complete and accurate. (RTC Response No. 1)

- This issue involves a disputed question of fact, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the draft permit is not complete and accurate, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 7: Whether the draft permit will impact property values and economic interests of nearby properties. (RTC Response No. 4).

- This is an issue of fact. However, it is not relevant and material to a decision on the application, as TCEQ does not have jurisdiction over impacts to property values and economic interests. The Executive Director does NOT recommend referring this issue to SOAH.

Issue 8: Whether the draft permit complies with applicable antidegradation requirements. (RTC Response No. 32)

- This issue involves a disputed question of fact and law, was raised during the public comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the draft permit does not comply with applicable antidegradation requirements, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 9: Whether the draft permit includes adequate provisions to protect the requesters' use and enjoyment of their property. (RTC Response No. 30)

- This issue involves a disputed question of fact, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the draft permit does not protect the requesters' use and enjoyment of their property, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 10: Whether the draft permit should be denied or altered in consideration of the need for the facility in accordance with Texas Water Code § 26.0282, Consideration of Need and Regional Treatment Options. (RTC Response No. 27)

- This issue involves a disputed question of fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the draft permit does not comply with Texas Water Code § 26.0282, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 11: Whether the draft permit includes appropriate provisions to protect against excessive growth of algae and maintain aesthetics of the receiving waters, including aquatic nutrient limitations. (RTC Response Nos. 24 and 26)

- This issue involves a disputed question of fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit. If it can be shown that the draft permit does not protect against excessive growth of algae and maintain aesthetics of the

receiving waters, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

Issue 12: Whether the draft permit should include provisions requiring the re-use of the effluent. (RTC Response No. 7)

- This is an issue of fact. However, it is not relevant and material to a decision on the application. The Executive Director does NOT recommend referring this issue to SOAH.

V. Contested Case Hearing Duration

If there is a contested case hearing on this application, the Executive Director recommends the duration of the hearing be 180 days from the preliminary hearing to the presentation of a proposal for decision to the Commission.

VI. Conclusion

The Executive Director recommends the following actions by the Commission:

1. The Executive Director recommends that the Commission find that Texas Rivers Protection Association, Greater Edwards Aquifer Alliance, and Byron Evans are affected persons and grant their hearing requests.
2. The Executive Director recommends that the Commission deny all other hearing requests.
3. If referred to SOAH, first refer the matter to Alternative Dispute Resolution for a reasonable period.
4. The Executive Director recommends referring the following timely raised relevant and material issues to SOAH:

Issue 1: Whether the draft permit is protective of water quality, groundwater, and uses of the receiving waters, including recreational use, in accordance with the Texas Surface Water Quality Standards. (RTC Response Nos. 2, 26, 30, 32)

Issue 2: Whether the draft permit includes adequate provisions to protect the health of requesters and their families as well as aquatic and terrestrial wildlife. (RTC Response No. 2 and 30)

Issue 5: Whether the draft permit complies with the TCEQ's rules addressing nuisance odor. (RTC Response No. 3)

Issue 6: Whether the draft permit is complete and accurate. (RTC Response No. 1)

Issue 8: Whether the draft permit complies with applicable antidegradation requirements. (RTC Response No. 32)

Issue 9: Whether the draft permit includes adequate provisions to protect the requesters' use and enjoyment of their property. (RTC Response No. 30)

Issue 10: Whether the draft permit should be denied or altered in consideration of the need for the facility in accordance with Texas Water Code § 26.0282, Consideration of Need and Regional Treatment Options. (RTC Response No. 27)

Issue 11: Whether the draft permit includes appropriate provisions to protect against excessive growth of algae and maintain aesthetics of the receiving waters, including aquatic nutrient limitations. (RTC Response Nos. 24 and 26)

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker,
Executive Director

Charmaine Backens, Deputy Director
Environmental Law Division



Bobby Salehi, Staff Attorney
Environmental Law Division
State Bar No. 24103912
P.O. Box 13087, MC 173
Austin, Texas 78711-3087
Phone: (512) 239-5930
Fax: (512) 239-0626

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on October 24, 2022, the original of the “Executive Director’s Response to Hearing Requests” for TPDES Permit WQ0015990001 for Gram Vikas Partners Inc. was filed with the TCEQ’s Office of the Chief Clerk, and a copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.



Bobby Salehi, Staff Attorney
Environmental Law Division
State Bar No. 24103912

Attachment A

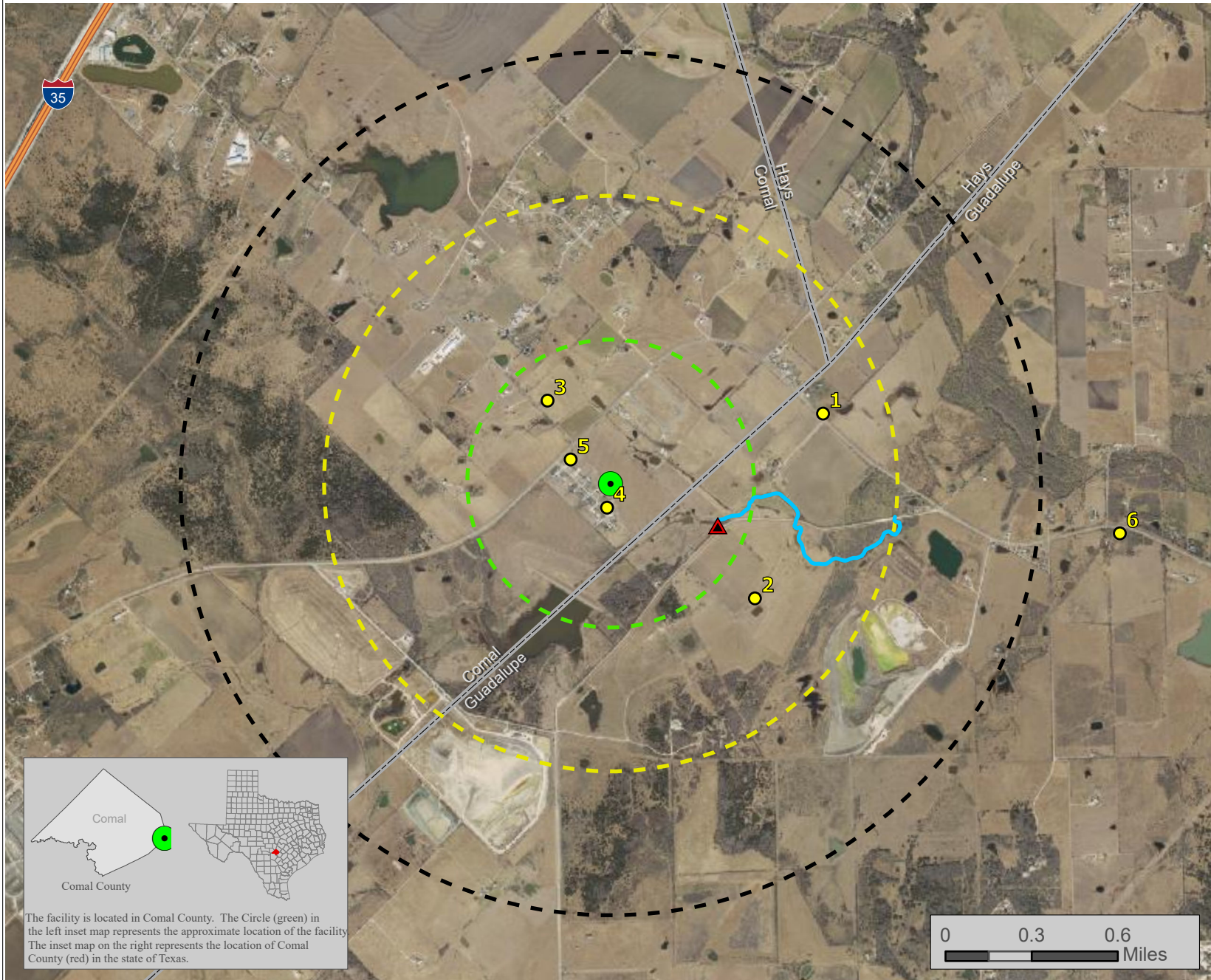
Gram Vikas Partners, Inc. TPDES Permit No. WQ0015990001

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: 10/12/2022
CRF 0077703
Cartographer: cschrade

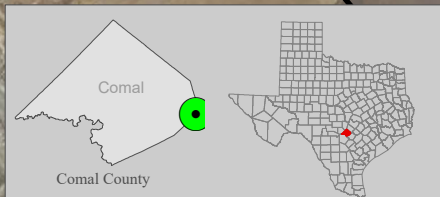


- Requestors
- ▲ Outfall
- Facility
- ~ 1 Mi Discharge Route
- 0.5 Mi Radius
- 1.0 Mi Radius
- 1.5 Mi Radius

- 1) Charles Pfluger (Member of Texas Rivers Protection Association and Greater Edwards Aquifer Alliance)
0.78 Mi from Facility
0.53 Mi from Outfall
- 2) Charles Pfluger (Member of Texas Rivers Protection Association and Greater Edwards Aquifer Alliance)
0.64 Mi from Facility
0.29 Mi from Outfall
- 3) Byron Evans
0.36 Mi from Facility
0.73 Mi from Outfall
- 4) Michael and Rita Lingensio
0.08 Mi from Facility
0.39 Mi from Outfall
- 5) Patrick Flint
0.16 Mi from Facility
0.56 Mi from Outfall
- 6) Mary Allen
1.78 Mi from Facility
1.40 Mi from Outfall

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.



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

MAILING LIST
GRAM VIKAS PARTNERS, INC.
DOCKET NO. 2022-1155-MWD; PERMIT NO. WQ0015990001

FOR THE APPLICANT:
via electronic mail:

Kelly Leach, President
Gram Vikas Partners, Inc.
215 West Bandera Road, #114-474
Boerne, Texas 78006
Tel: (210) 827-7918
Fax: (830) 249-4791
kellywelovedirt@gmail.com

Aaron Laughlin, P.E., Project Manager
Steger Bizzell
1979 South Austin Avenue
Georgetown, Texas 78626
Tel: (512) 930-9412
Fax: (512) 930-9416
alaughlin@stegerbizzell.com

FOR THE EXECUTIVE DIRECTOR
via electronic mail:

Bobby Salehi, Staff Attorney
Texas Commission on Environmental
Quality
Environmental Law Division, MC-173
P.O. Box 13087
Austin, Texas 78711
Tel: (512) 239-0600
Fax: (512) 239-0606
bobby.salehi@tceq.texas.gov

Abdur Rahim, Technical Staff
Texas Commission on Environmental
Quality
Water Quality Division, MC-148
P.O. Box 3087
Austin, Texas 78711
Tel: (512) 239-0504
Fax: (512) 239-4430
abdur.rahim@tceq.texas.gov

Ryan Vise, Deputy Director
Texas Commission on Environmental
Quality
External Relations Division
Public Education Program, MC-108
P.O. Box 13087
Austin, Texas 78711
Tel: (512) 239-4000
Fax: (512) 239-5678
pep@tceq.texas.gov

FOR PUBLIC INTEREST COUNSEL
via electronic mail:

Garrett T. Arthur, Public Interest Counsel
Texas Commission on Environmental
Quality
Public Interest Counsel, MC-103
P.O. Box 13087
Austin, Texas 78711
Tel: (512) 239-6363
Fax: (512) 239-6377
garrett.arthur@tceq.texas.gov

FOR ALTERNATIVE DISPUTE RESOLUTION
via electronic mail:

Kyle Lucas
Texas Commission on Environmental
Quality
Alternative Dispute Resolution, MC-222
P.O. Box 13087
Austin, Texas 78711
Tel: (512) 239-0687
Fax: (512) 239-4015
kyle.lucas@tceq.texas.gov

FOR THE CHIEF CLERK:
via electronic mail:

Docket Clerk
Texas Commission on Environmental
Quality
Office of Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711
Tel: (512) 239-3300
Fax: (512) 239-3311
www.tceq.texas.gov/goto/efilings

REQUESTER(S) / INTERESTED PERSON(S):

See attached list

REQUESTER(S)

Mary Annis Allen
8096 Fm 1101
Seguin, TX 78155-0481

William G Bunch
Executive Director, Save Our Springs
Alliance
4701 Westgate Blvd
Ste D401
Austin, TX 78745-1479

Tristan Castaneda Jr
502 W 13Th St # Tx
Austin, TX 78701-1827

Drew Engelke
101 E Court St
Seguin, TX 78155-5729

Byron Evans
2225 Watson Ln E
New Braunfels, TX 78130-2623

Patrick Flint
2505 Stetson
New Braunfels, TX 78130-0209

Michael Lingsjjo
2549 Stetson
New Braunfels, TX 78130-0209

Rita Lingsjjo
2549 Stetson
New Braunfels, TX 78130-0209

Karen F Montgomery
2536 Stetson
New Braunfels, TX 78130-0209

Annalisa Peace
Greater Edwards Aquifer Alliance
1809 Blanco Rd
San Antonio, TX 78212-2616

Annalisa Peace
Greater Edwards Aquifer Alliance
PO Box 15618
San Antonio, TX 78212-8818

David A Price
Texas Rivers Protection Association
444 Pecan Park Dr
San Marcos, TX 78666-8544

Victoria Rose
Save Our Springs Alliance
4701 Westgate Blvd
Ste D401
Austin, TX 78745-1479

Diane C Scott
8155 Fm 1101
Seguin, TX 78155-0425

James Seeger
8601 Fm 1101
Seguin, TX 78155-0421

PUBLIC OFFICIALS - INTERESTED
PERSON(S)

The Honorable John Kuempel
State Representative
Texas House of Representatives
District 44
Po Box 2910
Austin, TX 78768-2910

INTERESTED PERSON(S)

Jay Allen
12305 Huber Rd
Seguin, TX 78155-0428

Lanette Badling
29 Lone Oak Trl
Sunset Valley, TX 78745-2609

Marla Baker
8485 Fm 1101
Seguin, TX 78155-0209

Robert Bryant Sr
999 Schwarzlose Rd
New Braunfels, TX 78130-2752

Valorie Canales
Clayton Homes
2137 N IH 35
New Braunfels, TX 78130-2511

Kim Collier
Clayton Homes
2137I 35 N
New Braunfels, TX 78130-2511

Kimberly Collier
2528 Stetson
New Braunfels, TX 78130-0209

Clay Cone
13501 Huber Rd
Seguin, TX 78155-2260

Douglas Dehman
8447 Fm 1101
Seguin, TX 78155-0209

Kara Finlayson
199 Ski Plex Dr
Seguin, TX 78155-1970

Clay Forister
310 W IH 10
Seguin, TX 78155-1429

Clay Forister
Guadalupe County
2605 N Guadalupe St
Seguin, TX 78155-7356

Gib C Gilbert
6510 Fm 1101
New Braunfels, TX 78130-7107

Nathan M Glavy
Greater Edwards Aquifer Alliance
1809 Blanco Rd
San Antonio, TX 78212-2616

Nathan M Glavy
Greater Edwards Aquifer Alliance
Po Box 15618
San Antonio, TX 78212-8818

Tom Goynes
Texas Rivers Protection Association
444 Pecan Park Dr
San Marcos, TX 78666-8544

Cameron & Mia Granzin
2525 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2521 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2508 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2512 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2516 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2529 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2545 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2525 Stetson
New Braunfels, TX 78130-0209

Dawn Helms
Clayton Homes Of New Braunfels
2541 Stetson
New Braunfels, TX 78130-0209

Carlton Henk
805 Weston Rd
Marion, TX 78124-1335

Ronald B Ison III
2528 Stetson
New Braunfels, TX 78130-0209

Marty Kelly
Texas Parks And Wildlife Department
4200 Smith School Rd
Austin, TX 78744-3218

Jay Kramer
496 Commercial Dr
Buda, TX 78610-3536

Kyle Kutscher
101 E Court St
Seguin, TX 78155-5729

David Lapham
29 Lone Oak Trl
Sunset Valley, TX 78745-2609

Patrick Lynch III
376 Aspen Waters
New Braunfels, TX 78130-0115

Patrick Lynch
2115 Stephens Pl
Ste 400E
New Braunfels, TX 78130-2134

Brittney Madden
Chief of Staff, Texas House Representative

John Kuempel
Po Box 2910
Austin, TX 78768-2910

Barbara Mayfield
2517 Stetson
New Braunfels, TX 78130-0209

Thomas L Mayfield
2517 Stetson
New Braunfels, TX 78130-0209

Crystal Dawn Mishler
2513 Stetson
New Braunfels, TX 78130-0209

John Franklin Montgomery
2536 Stetson
New Braunfels, TX 78130-0209

Steve Morga
1700 Isaac Creek Cir
New Braunfels, TX 78132-3253

Alan Lee Mow
2548 Stetson
New Braunfels, TX 78130-0209

Corina Bautista Mow
2548 Stetson
New Braunfels, TX 78130-0209

Cody Murdoch
Clayton Homes
2524 Stetson
New Braunfels, TX 78130-0209

Cody Murdoch
Clayton Homes
2528 Stetson
New Braunfels, TX 78130-0209

Cody Murdoch
Clayton Homes
2544 Stetson
New Braunfels, TX 78130-0209

Cody Murdoch
Clayton Homes
2553 Stetson
New Braunfels, TX 78130-0209

Charles Pfluger
6960 Fm 1101
New Braunfels, TX 78130-7108

Charlie & Lindsay Pfluger
6960 Fm 1101
New Braunfels, TX 78130-7108

Steve Rasette
2553 Stetson
New Braunfels, TX 78130-0209

Trina Seagraves
2552 Stetson
New Braunfels, TX 78130-0209

Sheena Sihvonen
761 Moonglow Ave
New Braunfels, TX 78130-5341

Jennifer Tapia
2533 Stetson
New Braunfels, TX 78130-0209

David Tuckfield
The Al Law Group Plc
12400 W Highway 71
Ste 350-150
Bee Cave, TX 78738-6517

Roger Tuttle
14 Horseshoe Trl
New Braunfels, TX 78132-3726

Jeni Ware Clayton Homes
2137 N Ih 35
New Braunfels, TX 78130-2511