

# TCEQ Registration Form

January 26, 2023

## South Central Water Company Proposed TPDES Permit No. WQ0016060001

PLEASE PRINT

Name: Yvonne L. Chapman

Mailing Address: 30809 Sunlight Dr.

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

City/State: Bulverde TX Zip: 78103

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

Email: YvonneL.Chapman@yahoo.com

Phone Number: (210) 240-3148

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

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

Please add me to the mailing list.

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

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

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

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

**Ellie Guerra**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, January 27, 2023 3:01 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0016060001

**From:** cathy.david.tx@gmail.com <cathy.david.tx@gmail.com>  
**Sent:** Thursday, January 26, 2023 7:48 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0016060001

**REGULATED ENTY NAME** DIAMANTE RANCH WWTP

**RN NUMBER:** RN111249694

**PERMIT NUMBER:** WQ0016060001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** SOUTH CENTRAL WATER COMPANY

**CN NUMBER:** CN602602179

**FROM**

**NAME:** MS Catherine Croom

**EMAIL:** [cathy.david.tx@gmail.com](mailto:cathy.david.tx@gmail.com)

**COMPANY:**

**ADDRESS:** 30412 HEIMER CV  
BULVERDE TX 78163-4594

**PHONE:** 8309806161

**FAX:**

**COMMENTS:** I have serious concerns regarding this permit application and regarding the degradation to the Upper Cibolo Creek that will likely occur with the discharge of treated sewage into these waterways. There are several areas of concern with the current application: The effluent discharge levels in the application will negatively affect plant and animal life in the creek bed and cause dangerous algal growth. The Diamante Ranch Wastewater Treatment Plant should beneficially reuse their wastewater as opposed to discharging it. Any effluent that is not reused should be land applied.

Their proposed chlorine disinfectant treatment can cause negative impacts on human and aquatic life and should be replaced by an ultraviolet light disinfectant treatment. The discharge point of the treatment plant is extremely close to the Edwards Aquifer Recharge Zone. As a local well owner, this close proximity to the recharge zone raises grave water quality concerns since the effluent will have immediate access to the Edwards Aquifer through the permeable limestone and could negatively affect groundwater. Accidental spills of untreated or partially treated sewage could potentially enter and contaminate the aquifer. Based on these concerns, I ask that the TCEQ deny this permit. Thank you.

**Ellie Guerra**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, January 27, 2023 2:46 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0016060001

**From:** linda@lindafawcett.com <linda@lindafawcett.com>  
**Sent:** Thursday, January 26, 2023 1:00 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0016060001

**REGULATED ENTY NAME** DIAMANTE RANCH WWTP

**RN NUMBER:** RN111249694

**PERMIT NUMBER:** WQ0016060001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** SOUTH CENTRAL WATER COMPANY

**CN NUMBER:** CN602602179

**FROM**

**NAME:** Linda Fawcett

**EMAIL:** [linda@lindafawcett.com](mailto:linda@lindafawcett.com)

**COMPANY:**

**ADDRESS:** 8345 W RANCH ROAD 1674  
JUNCTION TX 76849-6018

**PHONE:** 3256654165

**FAX:**

**COMMENTS:** So much for no new wastewater discharge permits into pristine streams and that is where you know that is where it will end up besides in the aquifer. Do your duty and protect the environment, please convince South Central to at least do a well designed TLAP!

# TCEQ Registration Form

January 26, 2023

## South Central Water Company Proposed TPDES Permit No. WQ0016060001

<sup>#2</sup>  
PLEASE PRINT

Name: Ted and Gloria Hawkins

Mailing Address: 2361 Hilline Dr.

Physical Address (if different): same

City/State: Bulverde, TX Zip: 78163-1805

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

Email: gohawkins@msu.com

Phone Number: (214) 587-9477

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

Please add me to the mailing list.

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

I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.  
(Written comments may be submitted at any time during the meeting)

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

**Christina Bourque**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, January 17, 2023 1:19 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0016060001

**From:** davidmichaelhixon@gmail.com <davidmichaelhixon@gmail.com>  
**Sent:** Tuesday, January 17, 2023 10:26 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0016060001

**REGULATED ENTY NAME** DIAMANTE RANCH WWTP

**RN NUMBER:** RN111249694

**PERMIT NUMBER:** WQ0016060001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** SOUTH CENTRAL WATER COMPANY

**CN NUMBER:** CN602602179

**FROM**

**NAME:** David Hixon

**EMAIL:** [davidmichaelhixon@gmail.com](mailto:davidmichaelhixon@gmail.com)

**COMPANY:**

**ADDRESS:** 1205 KINNEY AVE E  
AUSTIN TX 78704-2156

**PHONE:** 2105080650

**FAX:**

**COMMENTS:** Please do NOT approve this Permit Application. If approved as is, this will discharge dangerous levels of contaminants into Upper Cibolo Creek.

**Ellie Guerra**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, January 27, 2023 2:37 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0016060001  
**Attachments:** SOSA Comments for South Central Water Company WQ0016060001.pdf

**From:** victoria@sosalliance.org <victoria@sosalliance.org>  
**Sent:** Thursday, January 26, 2023 2:42 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0016060001

**REGULATED ENTY NAME** DIAMANTE RANCH WWTP

**RN NUMBER:** RN111249694

**PERMIT NUMBER:** WQ0016060001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** SOUTH CENTRAL WATER COMPANY

**CN NUMBER:** CN602602179

**FROM**

**NAME:** Victoria Rose

**EMAIL:** [victoria@sosalliance.org](mailto:victoria@sosalliance.org)

**COMPANY:** Save Our Springs Alliance

**ADDRESS:** 4701 W GATE BLVD Ste. D-401  
AUSTIN TX 78745-1479

**PHONE:** 5124772320

**FAX:**

**COMMENTS:** Please find Save Our Springs Alliance's comments in the attached PDF.



Laurie Gharis  
Chief Clerk  
Texas Commission on Environmental Quality  
P.O. Box 13087 – MC 105  
Austin, Texas 787011 – 3087

January 26, 2023

**Via: Online Submission Form**

**RE: Application and Draft Permit of South Central Water Company, for Proposed TPDES Permit No. WQ0016060001**

To Ms. Gharis:

These comments are submitted on behalf of Save Our Springs Alliance (SOS), regarding the Application and Draft Permit of South Central Water Company, for proposed TPDES Permit No. WQ0016060001.

South Central Water Company. (“the Applicant”) has applied for a new discharge permit, proposed TPDES Permit No. WQ0016060001 (“the Draft Permit”), to authorize wastewater discharge at a volume not to exceed 600,000 gallons per day. The Applicant proposed to construct a new wastewater treatment plant, and the treated effluent from the facility would be discharged via pipe to an unnamed ditch, thence to Upper Cibolo Creek in Segment No. 1908 of the San Antonio River Basin. TCEQ conducted a Tier 1 antidegradation review and determined that the Draft Permit would not impair existing water quality uses, and TCEQ conducted Tier 2 antidegradation analysis of Upper Cibolo Creek to preliminarily determine that water quality would not be significantly degraded.

SOS’s primary concern with the Draft Permit is the lack of effluent limit for total phosphorus. In sensitive waterbodies such as Texas Hill Country streams, adding even seemingly small amounts of nutrient pollutants like phosphorus can lower water quality by more than a *de minimis* amount due to the sensitive nature of the ecosystem. And as the EPA explained “such activities as new discharges or expansion of existing facilities would presumably lower water quality and would not be permissible.” U.S. ENVIRONMENTAL PROTECTION AGENCY, WATER QUALITY STANDARDS HANDBOOK: CHAPTER 4: ANTIDEGRADATION 9 (2012). TCEQ, however, appears to have ignored this guidance that new discharges presumptively violate the antidegradation rules in its analysis of the Draft Permit.

Despite TCEQ’s conclusion that the Draft Permit would not impair existing water quality, the unlimited and high levels of total phosphorus allowed in the Draft Permit will degrade existing water quality and fail to protect existing uses. Based on the impacts of nutrient pollution discussed below, if the Draft Permit does not contain more stringent effluent limits on total

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phosphorus and a more stringent limit on nitrogen, the Draft Permit will violate TCEQ's antidegradation rules by failing to protect existing uses of the receiving waters and significantly degrading water quality, violate Texas Surface Water Quality Standards set out at 30 T.A.C. §307.4, harm aquatic and terrestrial wildlife, and impair adjacent and downstream landowners' use and enjoyment of their property.

Extensive research on nutrient pollution in nearby, similar rivers and creeks has demonstrated that adding even small amounts of phosphorus to these phosphorus limited streams will cause huge shifts in the biological, physical, and chemical integrity of the waterbody and lead to the proliferation of harmful algae.<sup>1</sup> In fact, scientific studies funded by TCEQ show that streams in the Texas Hill Country will experience shifts in algal growth and biological communities when total phosphorus concentrations reach levels of just 20 to 25 µ/L. In addition to the shifts in biological communities, the increase in phosphorus allowed in the Draft Permit could cause harmful algal blooms, fish kills, anoxic zones, and increased cyanobacteria.<sup>2</sup> These effects can lead to sick people, pets, and wildlife, contamination of food and water, depressions in property values, closed swimming and fishing areas, and impacts on livelihoods.

The mandates of the federal Clean Water Act and TCEQ rules guidance in conjunction with the rigorous scientific studies cited in footnote one point to the same conclusion: the increase in total phosphorus in Upper Cibolo Creek that would result from the Draft Permit under low flow conditions will result in a dramatic change in aquatic species composition and primary productivity.

In addition to setting more stringent limits on total phosphorus and nitrogen, the dissolved oxygen effluent parameter must be amended to adequately protect water quality and water quality uses.

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<sup>1</sup> Bioassessment of Four Hill Country Streams Threatened by Proposed Municipal Wastewater Discharges; PowerPoint Presentation on Nutrient Pollution in the Blanco River: [https://wimberleywatershed.org/wp-content/uploads/2020/08/KingRS\\_BlancoCityCouncil\\_Public\\_Comment\\_Aug\\_2020.pdf](https://wimberleywatershed.org/wp-content/uploads/2020/08/KingRS_BlancoCityCouncil_Public_Comment_Aug_2020.pdf); Presentation on Nutrient Pollution: <https://www.youtube.com/watch?v=abxeLoBTaLA>; Dodds et al., *Suggested Classification of Stream Trophic State: Distributions of Temperate Stream Types by Chlorophyll, Total Nitrogen, and Phosphorus*, 32 WATER RESOURCES 1455 (1998); U.S. ENVIRONMENTAL PROTECTION AGENCY, AMBIENT WATER QUALITY CRITERIA RECOMMENDATIONS, INFORMATION SUPPORTING THE DEVELOPMENT OF STATE AND TRIBAL NUTRIENT CRITERIA, RIVERS AND STREAMS IN NUTRIENT ECOREGION IV (2001); RYAN KING ET AL., DEVELOPMENT OF BIOLOGICAL INDICATORS OF NUTRIENT ENRICHMENT FOR APPLICATION IN TEXAS STREAM: § 106 WATER POLLUTION CONTROL GRANT #98665304 (2009); Jason Taylor et al., *Nonlinear Response of Stream Ecosystem Structure to Low-Level Phosphorus Enrichment*, 2014 FRESHWATER BIOLOGY 1 (2014). These resources provide more general information on the impacts of phosphorus pollution: U.S. Environmental Protection Agency, *Indicators: Phosphorus*, <https://www.epa.gov/national-aquatic-resource-surveys/indicators-phosphorus>; USGS, *Phosphorus and Water*, <https://www.usgs.gov/special-topics/water-science-school/science/phosphorus-and-water>.

<sup>2</sup> U.S. ENVIRONMENTAL PROTECTION AGENCY, A COMPILATION OF COST DATA ASSOCIATED WITH THE IMPACTS AND CONTROL OF NUTRIENT POLLUTION (2015).

SOS is also concerned that the Draft Permit allows for chlorine contact chambers for disinfection of the effluent rather than UV light treatment. The use of chlorine by the Applicant increases the risk of harmful impacts to humans and aquatic life and, any chlorine residue left in the effluent will lower water quality.

Lastly, SOS is concerned about the proximity of the proposed wastewater treatment facility and discharge point with the Edwards Aquifer Recharge Zone. The wastewater effluent discharged under the Draft Permit has an unimpeded path straight into the Edwards Aquifer via Upper Cibolo Creek, and the current effluent parameters in the Draft Permit are not sufficient to be protective of groundwater as the effluent will contain high levels of phosphorus and nitrogen, pharmaceuticals, surfactants, and other harmful pollutants. Further, an accidental spill of raw sewage from the proposed facility would flow into the drinking water source for 1.7 million Texans and the home of several endangered salamanders. The Applicant cannot be permitted to endanger such a vital source of freshwater in Texas.

For the above reasons, SOS opposes TPDES Permit No. WQ0016060001 and asks that the Application be denied. The Draft Permit will degrade water quality, cause a proliferation of nuisance algae, and disrupt the livelihoods of those living and working along the receiving waters. However, SOS believes that a zero-discharge system would alleviate the issues related to nutrient pollution and degradation of water quality associated with the Draft Permit. A zero-discharge system would allow the treated wastewater to stay on the site of the development to be put to beneficial use for the subdivision, including, reuse, landscape irrigation, potential dual piped systems to homes, and other beneficial uses or to be piped off site for other beneficial uses.

Thank you for considering SOS's comments and for holding a public meeting to allow the impacted community to learn more and express their concerns about the Draft Permit.

Sincerely,

Victoria Rose  
Staff Attorney  
Save Our Springs Alliance  
4701 Westgate Blvd.  
Bldg. D, Suite 401  
Austin, Texas 78745  
Tel.: 512-477-2320, ext. 6  
Fax: 512-477-6410  
victoria@sosalliance.org

# TCEQ Registration Form

January 26, 2023

## South Central Water Company Proposed TPDES Permit No. WQ0016060001

PLEASE PRINT

Name: David Spangh

Mailing Address: P. O. Box 17

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

City/State: Pu/wrde Zip: 78163

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

Email: DR Spangh @ R Mail

Phone Number: (210) 862-6968

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

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

Please add me to the mailing list.

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

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

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

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# TCEQ Registration Form

January 26, 2023

## South Central Water Company Proposed TPDES Permit No. WQ0016060001

PLEASE PRINT

Name: Cynthia Wallace

Mailing Address: 486 Comal Ave.

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

City/State: New Braunfels, Tx. Zip: 78130

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

Email: dhwater@yahoo.com

Phone Number: (830) 660-6933

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

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

RECEIVED

JAN 26 2023

AT PUBLIC MEETING

Please add me to the mailing list.

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

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

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

on TCEQ Needs to do a study of the effect of effluent  
on ~~of~~ Cibola Creek. Please Request funding for this.  
This is your job to follow up which could prevent other  
Issues developing

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

# TCEQ Registration Form

January 26, 2023

## South Central Water Company

### Proposed TPDES Permit No. WQ0016060001

*PLEASE PRINT*

Name: David L. Wallace

Mailing Address: 486 Comal Ave.

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

City/State: New Braunfels Tx, Zip: 78130

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

Email: dllrwater@yahoo.com

Phone Number: (830) 660-4765

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

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

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

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

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**Ellie Guerra**

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**From:** PUBCOMMENT-OCC  
**Sent:** Friday, January 27, 2023 2:50 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0016060001  
**Attachments:** SBCA statement on Diamante Ranch permit WQ0016060001.pdf

**From:** brian@savebartoncreek.org <brian@savebartoncreek.org>  
**Sent:** Thursday, January 26, 2023 4:28 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0016060001

**REGULATED ENTY NAME** DIAMANTE RANCH WWTP

**RN NUMBER:** RN111249694

**PERMIT NUMBER:** WQ0016060001

**DOCKET NUMBER:**

**COUNTY:** COMAL

**PRINCIPAL NAME:** SOUTH CENTRAL WATER COMPANY

**CN NUMBER:** CN602602179

**FROM**

**NAME:** Brian Zabcik

**EMAIL:** [brian@savebartoncreek.org](mailto:brian@savebartoncreek.org)

**COMPANY:** Save Barton Creek Association

**ADDRESS:** 15241 STATE HIGHWAY 53 Unit 670  
TEMPLE TX 76501-3489

**PHONE:** 7182880341

**FAX:**

**COMMENTS:** Save Barton Creek Association submits these comments on TPDES permit number WQ0016060001, filed by South Central Water Company for the Diamante Ranch wastewater plant. This facility would be located near Bulverde in western Comal County and would discharge up to 600,000 gallons of treated wastewater per day into Upper Cibolo Creek. For the reasons stated below, SBCA asks that a total phosphorus limit of 0.15 milligrams per liter be included in

this permit. Founded in 1979 and based in Austin, SBCA is one of the oldest citizens' environmental groups in Texas. As a result, we have gained extensive experience with wastewater permit applications in Central Texas. SBCA also serves as the facilitator for the No Dumping Sewage coalition, a collection of organizations and individuals working for better wastewater practices in the Hill Country. In addition, SBCA was one of the organizations that filed the Pristine Streams Petition with TCEQ in 2022, which asked the commission to stop issuing new wastewater discharge permits on streams with extremely low levels of phosphorus. As has been amply demonstrated by discharge facilities on the South San Gabriel River, the Blanco River, and elsewhere, even treated wastewater can contain enough phosphorus to cause out-of-control algae growths on pristine streams. Because of these activities, SBCA has a deep interest in wastewater permits on both pristine and near-pristine streams throughout the Hill Country. We have seen that TCEQ's standards have a huge effect on all parts of the region, including the part where SBCA is based. SBCA is a member of the Greater Edwards Aquifer Alliance, and we endorse all of the recommendations that GEAA listed in its letter to TCEQ on the Diamante Ranch application. In particular, we want to highlight the complete absence of a limit on total phosphorus in the draft permit that the commission's staff has already released. As mentioned above, even treated wastewater has been shown to contain enough phosphorus to cause suffocating algae growths on streams with very low phosphorus levels. While not as dramatic, the same effect can happen on streams with slightly higher levels of phosphorus. Because of the unique geography, climate, and geology in the Hill Country, streams in the region are very different from the rest of the state, and accordingly need different standards and regulations. TCEQ has recognized this, to a limited degree, by including a total phosphorus limit of 0.15 milligrams per liter in three discharge permits in the Hill Country — for Dripping Springs, Belterra, and Liberty Hill. It's worth noting that none of these permit holders have actually discharged wastewater containing that level of phosphorus, meaning that TCEQ has no real world evidence that a phosphorus limit of 0.15 mg/L will actually protect low-phosphorus streams. That's partly why the administrative law judges who reviewed TCEQ's proposed renewed permit for Liberty Hill recommended last fall that the city's phosphorus limit should be lowered even more, to 0.05 mg/L. TCEQ has not included a total phosphorus limit in any wastewater discharge permit issued since 2019. SBCA and many of our partners in the No Dumping Sewage coalition believe that the commission must start including a phosphorus limit in all new and renewed wastewater discharge permits in the Hill Country. A phosphorus limit is even more crucial for the Diamante Ranch permit with its maximum discharge rate of 600,000 gallons per day, which is very high for a non-municipal plant. The large volume means that larger amounts of pollutants will eventually flow into Upper Cibolo Creek. Because TCEQ has previously determined that a total phosphorus limit of 0.15 mg/L is necessary in some Hill Country discharge permits, SBCA respectfully asks that the same total phosphorus limit of 0.15 mg/L be included in the discharge permit for Diamante Ranch. Submitted by: Brian Zabcik  
Advocacy Director Save Barton Creek Association [brian@savebartoncreek.org](mailto:brian@savebartoncreek.org)



**Save Barton Creek Association**  
*Protecting the streams of Central Texas since 1979*

January 26, 2023

Laurie Gharis, Chief Clerk  
Office of the Chief Clerk, MC 105  
Texas Commission on Environmental Quality PO Box 13087  
Austin, TX 78711-3087

Submitted electronically at <https://www14.tceq.texas.gov/epic/eComment/>

**SBCA Statement on Diamante Ranch permit, TPDES # WQ0016060001**

Save Barton Creek Association submits these comments on TPDES permit number WQ0016060001, filed by South Central Water Company for the Diamante Ranch wastewater plant. This facility would be located near Bulverde in western Comal County and would discharge up to 600,000 gallons of treated wastewater per day into Upper Cibolo Creek. For the reasons stated below, SBCA asks that a total phosphorus limit of 0.15 milligrams per liter be included in this permit.

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In addition, SBCA was one of the organizations that filed the Pristine Streams Petition with TCEQ in 2022, which asked the commission to stop issuing new wastewater discharge permits on streams with extremely low levels of phosphorus. As has been amply demonstrated by discharge facilities on the South San Gabriel River, the Blanco River, and elsewhere, even treated wastewater can contain enough phosphorus to cause out-of-control algae growths on pristine streams. Because of these activities, SBCA has a deep interest in wastewater permits on both pristine and near-pristine streams throughout the Hill Country. We have seen that TCEQ's standards have an effect on all parts of the region, including the part where SBCA is based.

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Submitted by:

Brian Zabcik  
Advocacy Director  
Save Barton Creek Association  
brian@savebartoncreek.org