

Ellie Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, March 29, 2023 11:22 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016148001
Attachments: Greenwood Ventures WQ0016148001 - GBRA Supp Req. for Hearing and Comments.pdf

H

From: jadkins@gbra.org <jadkins@gbra.org>
Sent: Tuesday, March 28, 2023 1:17 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: Justin Adkins

EMAIL: jadkins@gbra.org

COMPANY: Guadalupe-Blanco River Authority

ADDRESS: 933 E COURT ST
SEGUIN TX 78155-5819

PHONE: 8303795822

FAX:

COMMENTS: Please see attached letter.

March 28, 2023

Ms. Laurie Gharis
Office of the Chief Clerk, MC 105
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building F
Austin, Texas 78735

Re: Supplemental Request for Contested Case Hearing and Comments on New Texas Commission on Environmental Quality ("TCEQ") Domestic Wastewater Permit No. WQ0016148001, Greenwood Ventures Group, LLC ("Greenwood")

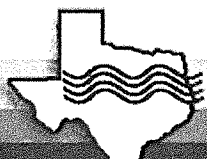
Dear Ms. Gharis,

The Guadalupe-Blanco River Authority ("GBRA") provides this supplemental request for a contested case hearing and comments in advance of the March 28, 2023 Public Meeting and in response to the Draft Permit issued on October 25, 2022.

As provided in our August 16, 2022 letter, GBRA is a conservation and reclamation district created by the State of Texas with the obligation to control, store, and preserve the waters of any rivers and streams, including the Guadalupe and Blanco Rivers and their tributaries, for all useful purposes. In fulfilling this obligation, GBRA acts as a stakeholder in the Plum Creek Watershed Protection Plan ("WPP"), which provides practical methods and recommendations for the responsible stewardship and protection of creeks and their associated watersheds. Issuance of the Draft Permit runs counter to the goals and objectives of the WPP, as well as the best management practices it establishes to reduce harmful nutrient loading of waterways in the Plum Creek Watershed. The proposed effluent limitations in the Draft Permit are insufficient to protect water quality in the watershed and in the Guadalupe and Blanco River areas. This insufficiency is made more clear in light of comparable permits with stricter effluent limitations, issued by the TCEQ for facilities in the immediate proximity and which discharge to the same river segments.

The Draft Permit requires that effluent be treated to the following limitations based on a 30-day average: 10 mg/l five-day carbonaceous biochemical oxygen demand (CBOD₅), 15 mg/l total suspended solids (TSS), 2.0 mg/l ammonia-nitrogen (NH₃-N), and 1.0 mg/l total phosphorus (TP), among others. The effluent will be discharged to an unnamed tributary, then to a second unnamed tributary, to West Fork Plum Creek, and lastly to Plum Creek in Segment No. 1810 of the Guadalupe River Basin. The effluent limitations in the Draft Permit are insufficiently protective of the waters of Plum Creek and the surrounding watershed.

Since 2010, the TCEQ has listed portions of Plum Creek as impaired on its Texas Integrated Report ("IR") of Surface Water Quality in Category 4b. The 2022 IR provides concerns for nutrients including nitrate nitrogen, E. coli, ammonia nitrogen, and total phosphorus within the Plum Creek Watershed.



Regional Laboratory: 933 East Court Street ~ Seguin, Texas 78155
830-379-5822 ~ 800-413-4130 ~ 830-379-9718 fax ~ www.gbra.org

GBRA

Guadalupe-Blanco River Authority
flowing solutions

Permits containing such lax nutrient limitations, such as the Draft Permit for Greenwood Ventures here, directly contribute to serious and ongoing problems with nutrient levels in portions of Plum Creek and are insufficient to ensure acceptable water quality. The CBOD₅ and TSS limitations in the draft permit should be revised to reflect limitations of 5 mg/l CBOD₅ and 5 mg/l TSS.

Request for a Contested Case Hearing

GBRA reiterates its request for a contested case hearing to address the effluent limitations in the Draft Permit, and other disputed issues of fact and law. Correspondence regarding the Greenwood application and Draft Permit and GBRA's comments and request for a contested case hearing should be directed to the following:

Justin C. Adkins
Assistant General Counsel
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, TX 78155

As previously noted, GBRA is an affected person with a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the Greenwood application and Draft Permit. GBRA's interest is not common to the members of the general public. The proposed wastewater treatment plant and discharge are located within GBRA's ten-county statutory district, which includes Kendall, Comal, Hays, Caldwell, Guadalupe, Gonzales, DeWitt, Victoria, Calhoun, and Refugio counties.¹

GBRA has an interest in protecting, and the authority to protect, the water quality in the rivers and streams within its district. GBRA's enabling legislation grants GBRA the authority to preserve the waters of any rivers and streams.² Additionally, Texas Water Code § 26.171 authorizes GBRA to inspect the public water in its area to determine if the quality of the water meets state water quality standards, to determine if the persons discharging effluent into the public water have obtained permits, and to determine if those permit holders are complying with the requirements of the permit. Granting a discharge permit that does not protect the water quality standards as outlined by WPP and IR, or granting a discharge permit to an entity that cannot comply with the aforementioned standards, adversely affects GBRA and thwarts its legislative directive to preserve the water within its district. GBRA's authority to protect and preserve the water quality within its district confers it with a personal justiciable interest affected by the Greenwood application and Draft Permit.

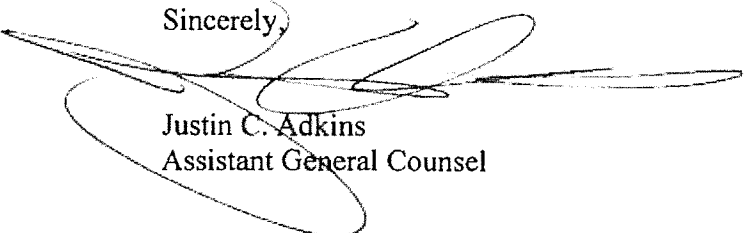
Issues to be Referred to SOAH

In light of the issues raised by GBRA in its comments above, GBRA reiterates its request that this matter be referred to the State Office of Administrative Hearings for a contested case hearing in order to address the disputed issues of fact and law.

¹ See Act Approved October 23, 1933, 43d Leg., 1st C.S., ch. 75 § 1, 1933 Tex. Gen. Laws 198; Act of October 17, 1935, 44th Leg., 1st C.S., ch. 410, § 1, 1935 Tex. Gen. Laws 1615; Act of June 2, 1969, 61st Leg., R.S., ch. 432 § 1, 1969 Tex. Gen. Laws 1465; Act of June 19, 1975, 64th Leg., R.S., ch. 433, § 1, 1975 Tex. Gen. Laws 1149.

² Act of June 19, 1975, 64th Leg., R.S., ch. 433, § 2, 1975 Tex. Gen. Laws 1149.

Sincerely,



Justin C. Adkins
Assistant General Counsel

Debbie Zachary

WQ
128306

From: PUBCOMMENT-OCC
Sent: Tuesday, August 16, 2022 1:56 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016148001
Attachments: Greenwood Ventures - GBRA Request for Public Meeting and Contested Case Hearing.pdf

PM
H

From: jadkins@gbra.org <jadkins@gbra.org>
Sent: Tuesday, August 16, 2022 1:12 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: MR Justin Adkins

EMAIL: jadkins@gbra.org

COMPANY: Guadalupe-Blanco River Authority

ADDRESS: 933 E COURT ST
SEGUIN TX 78155-5819

PHONE: 8303795822

FAX:

COMMENTS: Please see attached letter.

August 16, 2022

Ms. Laurie Gharis
Office of the Chief Clerk, MC 105
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building F
Austin, Texas 78735

Re: Request for Public Meeting and Contested Case Hearing, and Comments on New Texas Commission on Environmental Quality ("TCEQ") Domestic Wastewater Permit No. WQ0016148001, Greenwood Ventures Group, LLC ("Greenwood")

Dear Ms. Gharis,

The Guadalupe-Blanco River Authority ("GBRA") provides these comments consistent with its directive as a Conservation and Reclamation District created by the State of Texas with the obligation to control, store, and preserve the waters of any rivers and streams, including the Guadalupe and Blanco Rivers and their tributaries for all useful purposes.

Under proposed permit No. WQ0016148001, the discharge of the treated effluent will flow to an onsite pond, then to West Fort Plum Creek, then to Plum Creek, then to the San Marcos River of the Guadalupe River Basin. GBRA is concerned that the proposed permit parameter limitations in the proposed permit are not sufficiently protective. Tighter standards are needed to preserve the integrity of the water quality in this area and stream segments.

GBRA is a stakeholder in the Plum Creek Watershed Protection Plan ("WPP"), which provides for the responsible stewardship and protection of the creeks and their associated watersheds, including voluntary and non-regulatory management. Since 2010, the TCEQ has listed portions of Plum Creek as impaired on its Texas Integrated Report ("IR") of Surface Water Quality in Category 4b. The 2022 IR provides concerns for nitrate nitrogen, E. coli, ammonia nitrogen, and total phosphorus within the Plum Creek Watershed. The proposed permit is inconsistent with the goals of the WPP, as well as the recommendations and best management practices established by said plan to reduce nutrient loading in the watershed. GBRA's commitment to water quality and compliance with such permits in the Guadalupe River basin is of paramount importance.

Request for a Public Meeting

GBRA requests a public meeting so that applicant, Greenwood, and Texas Commission on Environmental Quality staff may provide clarification on this proposed permit application and related water quality concerns. Granting the public meeting to address GBRA's water quality concerns may prevent the need for a contested case hearing on this application. GBRA's address is as follows:

Regional Laboratory: 933 East Court Street ~ Seguin, Texas 78155
830-379-5822 ~ 800-413-4130 ~ 830-379-9718 fax ~ www.gbra.org



GBRA

Guadalupe-Blanco River Authority
flowing solutions

Guadalupe-Blanco River Authority
933 East Court Street
Seguin, TX 78155

Correspondence regarding the Greenwood application and GBRA's comments and request for a contested case hearing should be directed to the following:

Justin C. Adkins
Assistant General Counsel
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, TX 78155

GBRA is an affected person with a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the Greenwood application. GBRA's interest is not common to the members of the general public. The proposed wastewater treatment plant and discharge are located within GBRA's ten-county statutory district, which includes Kendall, Comal, Hays, Caldwell, Guadalupe, Gonzales, DeWitt, Victoria, Calhoun, and Refugio. *See* Act Approved October 23, 1933, 43d Leg., 1st C.S., ch. 75 § 1, 1933 Tex. Gen. Laws 198; Act of October 17, 1935, 44th Leg., 1st C.S., ch. 410, § 1, 1935 Tex. Gen. Laws 1615; Act of June 2, 1969, 61st Leg., R.S., ch. 432 § 1, 1969 Tex. Gen. Laws 1465; Act of June 19, 1975, 64th Leg., R.S., ch. 433, § 1, 1975 Tex. Gen. Laws 1149.

GBRA has an interest in protecting, and the authority to protect, the water quality in the rivers and streams within its district. GBRA's enabling legislation grants GBRA the authority to preserve the waters of any rivers and streams. Act of June 19, 1975, 64th Leg., R.S., ch. 433, § 2, 1975 Tex. Gen. Laws 1149. Additionally, section 26.171 of the Texas Water Code authorizes GBRA to inspect the public water in its area to determine if the quality of the water meets state water quality standards, to determine if the persons discharging effluent into the public water have obtained permits, and to determine if those permit holders are complying with the requirements of the permit. Granting a discharge permit that does not protect the water quality standards as outlined by WPP and IR, or granting a discharge permit to an entity that cannot comply with the aforementioned standards, adversely affects GBRA and thwarts its legislative directive to preserve the water within its district. GBRA's authority to protect and preserve the water quality within its district confers it with a personal justiciable interest affected by the Greenwood application.

Issues to be Referred to SOAH

In light of the issues raised by GBRA in its comments above, GBRA requests that this matter be referred to the State Office of Administrative Hearings for a contested case hearing in order to address the disputed issues of fact and law.

Sincerely,



Justin C. Adkins

August 16, 2022

Ms. Laurie Gharis
Office of the Chief Clerk, MC 105
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building F
Austin, Texas 78735

Re: Request for Public Meeting and Contested Case Hearing, and Comments on New Texas Commission on Environmental Quality ("TCEQ") Domestic Wastewater Permit No. WQ0016148001, Greenwood Ventures Group, LLC ("Greenwood")

Dear Ms. Gharis,

The Guadalupe-Blanco River Authority ("GBRA") provides these comments consistent with its directive as a Conservation and Reclamation District created by the State of Texas with the obligation to control, store, and preserve the waters of any rivers and streams, including the Guadalupe and Blanco Rivers and their tributaries for all useful purposes.

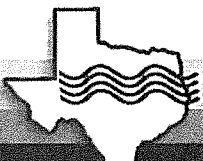
Under proposed permit No. WQ0016148001, the discharge of the treated effluent will flow to an onsite pond, then to West Fort Plum Creek, then to Plum Creek, then to the San Marcos River of the Guadalupe River Basin. GBRA is concerned that the proposed permit parameter limitations in the proposed permit are not sufficiently protective. Tighter standards are needed to preserve the integrity of the water quality in this area and stream segments.

GBRA is a stakeholder in the Plum Creek Watershed Protection Plan ("WPP"), which provides for the responsible stewardship and protection of the creeks and their associated watersheds, including voluntary and non-regulatory management. Since 2010, the TCEQ has listed portions of Plum Creek as impaired on its Texas Integrated Report ("IR") of Surface Water Quality in Category 4b. The 2022 IR provides concerns for nitrate nitrogen, E. coli, ammonia nitrogen, and total phosphorus within the Plum Creek Watershed. The proposed permit is inconsistent with the goals of the WPP, as well as the recommendations and best management practices established by said plan to reduce nutrient loading in the watershed. GBRA's commitment to water quality and compliance with such permits in the Guadalupe River basin is of paramount importance.

Request for a Public Meeting

GBRA requests a public meeting so that applicant, Greenwood, and Texas Commission on Environmental Quality staff may provide clarification on this proposed permit application and related water quality concerns. Granting the public meeting to address GBRA's water quality concerns may prevent the need for a contested case hearing on this application. GBRA's address is as follows:

Regional Laboratory: 933 East Court Street ~ Seguin, Texas 78155
830-379-5822 ~ 800-413-4130 ~ 830-379-9718 fax ~ www.gbra.org



GBRA

Guadalupe-Blanco River Authority
flowing solutions

Guadalupe-Blanco River Authority
933 East Court Street
Seguin, TX 78155

Correspondence regarding the Greenwood application and GBRA's comments and request for a contested case hearing should be directed to the following:

Justin C. Adkins
Assistant General Counsel
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, TX 78155

GBRA is an affected person with a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the Greenwood application. GBRA's interest is not common to the members of the general public. The proposed wastewater treatment plant and discharge are located within GBRA's ten-county statutory district, which includes Kendall, Comal, Hays, Caldwell, Guadalupe, Gonzales, DeWitt, Victoria, Calhoun, and Refugio. *See* Act Approved October 23, 1933, 43d Leg., 1st C.S., ch. 75 § 1, 1933 Tex. Gen. Laws 198; Act of October 17, 1935, 44th Leg., 1st C.S., ch. 410, § 1, 1935 Tex. Gen. Laws 1615; Act of June 2, 1969, 61st Leg., R.S., ch. 432 § 1, 1969 Tex. Gen. Laws 1465; Act of June 19, 1975, 64th Leg., R.S., ch. 433, § 1, 1975 Tex. Gen. Laws 1149.

GBRA has an interest in protecting, and the authority to protect, the water quality in the rivers and streams within its district. GBRA's enabling legislation grants GBRA the authority to preserve the waters of any rivers and streams. Act of June 19, 1975, 64th Leg., R.S., ch. 433, § 2, 1975 Tex. Gen. Laws 1149. Additionally, section 26.171 of the Texas Water Code authorizes GBRA to inspect the public water in its area to determine if the quality of the water meets state water quality standards, to determine if the persons discharging effluent into the public water have obtained permits, and to determine if those permit holders are complying with the requirements of the permit. Granting a discharge permit that does not protect the water quality standards as outlined by WPP and IR, or granting a discharge permit to an entity that cannot comply with the aforementioned standards, adversely affects GBRA and thwarts its legislative directive to preserve the water within its district. GBRA's authority to protect and preserve the water quality within its district confers it with a personal justiciable interest affected by the Greenwood application.

Issues to be Referred to SOAH

In light of the issues raised by GBRA in its comments above, GBRA requests that this matter be referred to the State Office of Administrative Hearings for a contested case hearing in order to address the disputed issues of fact and law.

Sincerely,


Justin C. Adkins

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Friday, October 14, 2022 2:58 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016148001

H

From: m.edmo@yahoo.com <m.edmo@yahoo.com>
Sent: Friday, October 14, 2022 12:31 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: Martin Edmondson

EMAIL: m.edmo@yahoo.com

COMPANY: Double M Ranch

ADDRESS: 162 PAINT BRUSH TRL
LOCKHART TX 78644-4565

PHONE: 4803632047

FAX:

COMMENTS: To Whom it May Concern, As a resident in the vicinity of the subject of this permit I request that this permit be rejected for the reasons stated below and request that a hearing is scheduled to review the impact of the local environment and the concerns of the area residents. -Toxicity and hazardous odors would be detrimental to human and wildlife health in the vicinity. -The negative impact of the constant smell from such a waste-water treatment plant, and its pretreatment storage and processing, will be imposed to all in the area. -Hazardous and possible explosive

environmental conditions a risk if the plant improperly operates. -Additional air pollution from the electric grid created from 24/7 running of the plant, which requires large amounts of electricity. -Noise pollution from normal operation of such a plant. -Noisy generators that most likely will be on site due to the need to have uninterrupted electrical power. - Possible contamination of natural underground reservoirs and nearby ponds from a catastrophic failure. -Possible land/home value and appeal decline from bad smelling air from the plant. -Infringement on natural wildlife habitats at site and downstream. -Erosion of naturally occurring waterways due to a possible 975,000 gallons per day of discharge, released into a wet weather ravine. -Additional roadway traffic from trucks having to pump out, haul, and dispose of sludge. - The release of chemicals (i.e. Hydrogen Sulfide gas) into the air from the STP (Sewage Treatment Plant) process, will be detrimental to the surrounding residents, livestock, and wildlife in the area. - Fire and explosion hazard to nearby residents as the process creates biogas, which if improperly handled would create a dire situation. - Contamination of nearby drinking water sources, reservoirs, ponds, and streams from treated waste water released over time with normal plant operation and/or if a catastrophic failure occurs. Environmental Pollution: - Contamination of nearby drinking water sources, reservoirs, ponds, and streams from treated waste water released over time with normal plant operation and/or if a catastrophic failure occurs. - Additional air pollution generated from the constant 24/7 requirement from the large electrical draw from the local electric grid. - Additional air pollution possible from plant infrastructure construction and sludge pumping, logistics, and disposal. Please reject this permit at this time until the impact of this project on the local environment is understood and the effected area residents are given an opportunity to provide their feedback and concerns. I look forward to your response. Regards, Marty Edmondson 162 Paint Brush Trail Lockhart TX 78644 (480) 363 2047

Ellie Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, October 25, 2022 9:08 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: CORRECTION: Public comment on Permit Number WQ0016148001

H

From: PUBCOMMENT-OCC
Sent: Monday, October 17, 2022 7:50 AM
To: PUBCOMMENT-OCC2 <pubcomment-occ2@tceq.texas.gov>; PUBCOMMENT-OPIC <pubcomment-opic@tceq.texas.gov>; PUBCOMMENT-ELD <pubcomment-eld@tceq.texas.gov>; PUBCOMMENT-WQ <pubcomment-wq@tceq.texas.gov>
Subject: FW: Public comment on Permit Number WQ0016148001

From: Buckylindsey@aol.com <Buckylindsey@aol.com>
Sent: Friday, October 14, 2022 4:37 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: Larry Lindsey

EMAIL: Buckylindsey@aol.com

COMPANY:

ADDRESS: 1635 WESTWOOD RD
LOCKHART TX 78644-4000

PHONE: 2147074774

FAX:

COMMENTS: I'm Larry Lindsey. We bought our property on Westwood Rd in 1990 to have a place for my dad to look after and for our family to escape to from DFW. We started with 200ac and grew to 640. Eventually Gale and I moved here to raise our 2 daughters. In 1990 we were between 2 water municipalities so we brought water with us whenever we visited our small cabin. The land had been over grazed and over hunted. Wildlife seemed almost non existent. We eventually started making better decisions about grazing and wildlife management. Added 2 ponds to help with water retention and erosion control. We now have a flourishing wildlife population and are able to use it for others to enjoy. We auction off 2 hunts each year to raise scholarship money for Caldwell County students and to help support Lockhart teachers. We also are active with Texas Parks and Wildlife offering a youth hunt through their Youth hunting program. The Westfork runs thru the middle of our property. We've experienced first hand what happens when heavy rains overflow it's banks. At least twice witnessing floodwaters over 200yds wide rushing through the proposed future development property and near the proposed waste water plant. I duubt this would be very good for anyone downstream. We oppose this permit and request a hearing. Thanks, Larry Lindsey LLRanch

TCEQ Registration Form

March 28, 2023

Greenwood Ventures Group LLC TPDES PERMIT FOR MUNICIPAL WASTEWATER PERMIT NO. WQ0016148001

PLEASE PRINT

Name: Larry Lindsey

Mailing Address: 1635 Westwood Rd

Physical Address (if different): _____

City/State: Lockhart, Texas Zip: 78644

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

Email: larrylindsey@aol.com

Phone Number: (214) 707-4774

- 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. *maybe*

☐ 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

From: PUBCOMMENT-OCC
Sent: Wednesday, March 29, 2023 11:31 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016148001
Attachments: GEAA Comments GreenwoodVentures_LLWWTP032823.pdf

H

From: annalisa@aquiferalliance.org <annalisa@aquiferalliance.org>
Sent: Tuesday, March 28, 2023 5:29 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: MRS Annalisa Peace

EMAIL: annalisa@aquiferalliance.org

COMPANY: Greater Edwards Aquifer Alliance

ADDRESS: PO BOX 15618
SAN ANTONIO TX 78212-8818

PHONE: 2103200149

FAX: 2103206298

COMMENTS: Please accept the attached comments on behalf of the fifty-five member groups of the Greater Edwards Aquifer Alliance.



Member Organizations

Alamo, Austin, and Lone Star chapters of the Sierra Club

Bexar Audubon Society

Austin, Bexar and Travis Green Parties

Bexar Grotto

Boerne Together

Bulverde Neighborhood Alliance

Bulverde Neighbors for Clean Water

Cibolo Center for Conservation

Citizens for the Protection of Cibolo Creek

Comal County Conservation Alliance

Environment Texas

First Universalist Unitarian Church of SA

Friends of Canyon Lake

Friends of Dry Comal Creek

Friends of Government Canyon

Fuerza Unida

Green Society of UTSA

Guadalupe River Road Alliance

Guardians of Lick Creek

Headwaters at Incarnate Word

Helotes Heritage Association

Hill Country Alliance

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

Native Plant Society of Texas – SA

Northwest Interstate Coalition of Neighborhoods

Pedernales River Alliance – Gillespie Co.

Preserve Castroville

Preserve Lake Dunlop Association

Preserve Our Hill Country Environment

RiverAid San Antonio

San Antonio Audubon Society

San Antonio Conservation Society

San Geronimo Valley Alliance

San Marcos Greenbelt Alliance

San Marcos River Foundation

Save Barton Creek Association

Save Our Springs Alliance

Scenic Loop/Boerne Stage Alliance

Securing a Future Environment

SEED Coalition

Signal Hill Area Alliance

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection Assoc.

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

March 28, 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/>

Re: Comments and Contest Case Hearing Request Regarding the Application of Greenwood Ventures LLC. for TPDES Permit No. WQ0016148001

Please accept the attached comments on behalf of the fifty-five member groups of the Greater Edwards Aquifer Alliance.

1. Background. Greenwood Ventures Group LLC, 101 Parklane Boulevard, Suite 102, Sugar Land, Texas 77478, has applied to the Texas Commission on Environmental Quality (TCEQ) for new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0016148001, to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 975,000 gallons per day

The facility will be located approximately 1.87 miles southwest of the intersection of County Road 214 and U.S. Highway 183, in Caldwell County, Texas 78644. The treated effluent will be discharged to an unnamed tributary, thence to a second unnamed tributary, thence to West Fork Plum Creek, and thence to Plum Creek in Segment No. 1810 of the Guadalupe River Basin. The unclassified receiving water uses are minimal aquatic life use for unnamed tributary and limited aquatic life use for West Fork Plum Creek (intermittent with pools), and high aquatic life use for West Fork Plum Creek (perennial). The designated uses for Segment No. 1810 are primary contact recreation, aquifer protection, and high aquatic life use

2. Greater Edwards Aquifer Alliance (GEAA). GEAA submits the following comments on behalf of our fifty-five member organizations and requests a contested case hearing regarding this permit application. GEAA also requests that our organization is recognized as an affected party with standing to represent our members who are adjacent landowners. GEAA is a 501(c)(3) nonprofit organization that promotes effective broad-based advocacy for protecting and preserving the Edwards Aquifer, its springs, watersheds, and the Texas Hill Country that sustains it. GEAA has multiple members who would be adversely affected by the proposed application of Greenwood Ventures Group LLC.

GEAA's members have serious concerns regarding the permit application and draft permit, and regarding the degradation of Plum Creek that will likely occur with the increased discharge of treated sewage into these waterways. GEAA and its members' specific areas of concern are summarized in the following section of this letter.

PO Box 15618

San Antonio, Texas 78212

(210) 320-6294

3. **Comments on the application.** As noted in the Notice of Application and Preliminary Decision for TPDES Permit for Municipal Wastewater, the discharge route is from an unnamed tributary, thence to a second unnamed tributary, thence to West Fork Plum Creek, thence to Plum Creek in Segment No. 1810 of the Guadalupe River Basin. There are several areas of concern with the current application:

A. Effluent Discharge Levels: The effluent discharge levels in the draft permit currently depict a phased approach for effluent discharge levels as the construction of the Lockhart Landing Wastewater Treatment Facility (WWTF) occurs, with the applicant being granted effluent discharge level limits of 10 mg/l carbonaceous biochemical oxygen demand (CBOD₅), 15 mg/l total suspended solids (TSS), 2 mg/l ammonia-nitrogen (NH₃-N), and 1 mg/l for total phosphorus (TP).

CBOD₅ is the amount of dissolved oxygen consumed in five days by biological processes breaking down organic matter, but in which the contribution from nitrogenous bacteria has been suppressed. Essentially, CBOD₅ is a marker of how much waste has been left untreated during the wastewater treatment process. This results in the untreated waste being treated in the stream itself, which is a process that consumes oxygen, including the dissolved oxygen in the water that's used by fish and other aquatic life. A high level of CBOD₅ threatens the health of the aquatic life of the receiving waterbody and raises the chance of fish kills.

TSS are waterborne particles that are larger than 2 microns that float or "suspend" in water. A variety of particles can be considered suspended solids, including plankton, sand, and sediment. In some instances, algae and bacteria may also be considered total suspended solids. The impact total suspended solids have on water quality is associated with a waterbody's clarity. The higher the amount of total suspended solids present in a waterbody, the increased chance of lowering the waterbody's natural dissolved oxygen level and increasing its water temperature. These implications would threaten the survival of the high aquatic life that is present in Plum Creek, a receiving waterbody for the Lockhart Landing WWTF's discharged effluent. Further, the increased levels of total suspended solids could block the needed sunlight that Plum Creek utilizes for photosynthesis; decreasing the survival of plants and further decreasing the waterbody's oxygen levels.

Lastly, phosphorus is a "limiting nutrient" in ecosystems, meaning the quantity of this nutrient controls the pace of algal and aquatic plant production. However, excess quantities of phosphorus, even in small amounts, can lead to eutrophication and harmful algal growth in a waterbody.

GEAA strongly encourages the adoption of a CBOD₅ limit of 5 mg/l, a Total Suspended Solids limit of 5 mg/l, and a Total Phosphorus limit of 0.5 mg/l; **bringing the effluent discharge level to a 5mg/l CBOD₅, 5mg/l TSS, 2 mg/l NH₃-N, and 0.50 mg/l TP maximum effluent discharge limits.**

B. Water Quality and Quantity Impacts: As stated in the application, the discharged effluent from an unnamed tributary, thence to a second unnamed tributary, thence to West Fork Plum Creek, thence to Plum Creek in Segment No. 1810 of the Guadalupe River Basin at a maximum rate of 975,000 gallons per day. Since 2008, Plum Creek has been actively following strategies found in a United States Environmental Protection Agency (USEPA) sponsored watershed protection plan (WPP) to restore and protect the water quality of Plum Creek. According to the Plum Creek WPP¹, water quality data dating back to 1998 indicated *E. coli* levels were not meeting Texas water quality standards for recreation use.

¹Berg, Matt, et al. Plum Creek Watershed Partnership, College Station, TX, 2008, pp. 1–170, Plum Creek Watershed Protection Plan.

Further, a 2022 Plum Creek WPP update² revealed that the upper, middle, and lower reaches of Plum Creek are still not meeting water quality standards for *E. coli*, and are listed in the Texas Commission on Environmental Quality's (TCEQ) Integrated Report; a biannual report indicating the water quality status of Texas' natural waters.

The 2022 Plum Creek WPP update also showed that Plum Creek is currently receiving treated wastewater discharge from 23 outfalls that are associated with 18 different TPDES permits across the watershed area (with three permits still pending). From these outfalls, prior to the potential approval of this major amendment, Plum Creek has the potential to receive an approximate range of 9.8 – 19.8 million gallons of treated effluent. With the potential increase of treated effluent entering Plum Creek resulting from Greenwood Ventures LLC. application, GEAA would have serious concerns about the overall environmental integrity and stability of Plum Creek and threatened the success of meeting the implementation goals of the Plum Creek WPP.

C. Disinfectant Method: The application indicates that Greenwood Ventures LLC. will be utilizing chlorine contact chambers as a means of disinfectant to further treat the effluent from the Lockhart Landing Wastewater Treatment Facility. We urge the disinfectant method to be changed to an ultraviolet light disinfectant. Ultraviolet light disinfectant treatment requires less space and is a physical process (rather than a chemical process) that has no residual effect that could harm humans or aquatic life.

All forms of chlorine are highly corrosive and toxic, and chlorine residuals could cause negative impacts on aquatic life. Further, chlorine residuals are unstable in the presence of high concentrations of chlorine-demanding materials (BOD). This would require wastewater with high BOD concentrations to be treated with high chlorine doses for adequate disinfection, increasing the likelihood of hazardous compounds such as trihalomethanes.

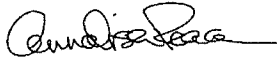
D. Incorporation of Beneficial Reuse: Examining the application paperwork, the Greenwood Ventures LLC. application does not include any capacity to conduct beneficial reuse, which would reduce the risk of promoting environmental harm to Plum Creek and the surrounding watershed areas. Accordingly, GEAA urges Greenwood Ventures LLC. to utilize a "One Water" approach for their wastewater treatment system, incorporating beneficial reuse of effluent (to the extent possible), thereby eliminating the need to discharge effluent into Plum Creek. In the event that Greenwood Ventures LLC. is unable to reuse all the wastewater generated, it is GEAA's recommendation that the remaining amounts be land applied, with Greenwood Ventures LLC. purchasing the necessary land for such and obtaining the requisite Texas Land Application Permit (TLAP) from TCEQ.

The TCEQ has previously stated that in evaluating wastewater permits, they consider baseline conditions in the receiving stream, the physical and hydrological characteristics of the stream, waterbody uses, and the associated water quality standards that protect those uses. We trust that the TCEQ will consider the stated factors when implementing Greenwood Ventures LLC. TPDES application and will adopt standards that are in line with others in Central Texas.

²Plum Creek Watershed Partnership. Plum Creek Watershed Partnership, College Station, TX, 2022, pp. 1–83, *2022 Update to The Plum Creek Watershed Protection Plan*.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace", written over a horizontal line.

Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance

A handwritten signature in black ink, appearing to read "Nathan Glavy", written over a horizontal line.

Nathan Glavy
Technical Director
Greater Edwards Aquifer Alliance

A handwritten signature in black ink, appearing to read "Mike Clifford", written over a horizontal line.

Mike Clifford
Technical Director
Greater Edwards Aquifer Alliance

TCEQ Registration Form

March 28, 2023

Greenwood Ventures Group LLC TPDES PERMIT FOR MUNICIPAL WASTEWATER PERMIT NO. WQ0016148001

PLEASE PRINT

Name: Mike Clifford

Mailing Address: 5104 Maulding Pass Ave

Physical Address (if different): _____

City/State: Austin, TX Zip: 78749

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

Email: mike@aquiferalliance.org

Phone Number: (512) 426-4463

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

If yes, which one? Greater Edwards Aquifer Alliance (GEAA)

☐ 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.

Renee Lyle

From: PUBCOMMENT-OCC
Sent: Thursday, October 5, 2023 11:56 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0016148001
Attachments: SMRF Contested Case Hearing Request Greenwood Ventures WQ0016148001.pdf

H

From: victoria@sosalliance.org <victoria@sosalliance.org>
Sent: Wednesday, October 4, 2023 4:16 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

NAME: Victoria Rose

EMAIL: 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 SMRF's contested case hearing request in the attached PDF

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

October 4, 2023

Via: Online Submission Form

Re: Request for Contested Case Hearing on the Application and Draft Permit of Greenwood Ventures Group, LLC for Proposed TPDES Permit No. WQ0016148001

Dear Ms. Gharis:

The San Marcos River Foundation (SMRF) requests a contested case hearing on the application and draft permit of Greenwood Ventures Group, LLC for new proposed TPDES Permit No. WQ0016148001.

I. Background.

Greenwood Ventures Group, LLC (“the Applicant”) has applied for a new TPDES permit no. WQ0016148001 (“the draft permit”) to authorize discharge of 975,000 gallons per day of wastewater into an unnamed tributary, thence to another unnamed tributary, thence to West Fork Plum Creek, thence to Plum Creek in Segment 1810 of the Guadalupe River Basin. West Fork Plum Creek and Plum Creek are designated as having high aquatic life use.

II. The San Marco River Foundation Meets the Requirements to be Considered an “Affected Person” in Order to Contest the Draft Permit.

SMRF meets the requirements set out in 30 T.A.C. § 55.205 for a group or association to be considered an “affected person” for the purposes of requesting a contested case hearing.

SMRF is a non-profit organization that was established to protect public access to and to preserve the San Marcos River and its tributaries. To carry out this mission, SMRF works to protect the flow of aquifer fed springs into the San Marcos River, improve the water quality of the river, protect the beauty of the river and nearby parks, and protect streams what flow into the San Marcos River. A large part of SMRF’s work involves water quality monitoring and scientific studies aimed at improving the quality of effluent discharged from wastewater facilities, and SMRF regularly participates in the wastewater permitting process. SMRF’s work and mission directly encompass protecting the receiving waters for the Draft Permit since the receiving waters for the Draft Permit flow into the San Marcos River, and the issuance of the Draft Permit will harm SMRF’s interest in the protection of water quality, aquatic life, property values, recreation, conservation, and aesthetic beauty of the San Marcos River and Plum Creek. SMRF submitted timely comments on March 28, 2023, detailing the ways in which the Draft Permit will harm these interests and the receiving waters.

SMRF has members who would otherwise have standing to request a contested case hearing for the Draft Permit in their own right. Among these is SMRF member Chelsea Collie.

Jerry Doyle is a SMRF member who owns real property and lives at 832 FM 671, Lockhart TX 78644 which is less than a mile from the discharge point for the draft permit. Mr. Doyle's economic, property, aesthetic, recreation, and personal health and safety interests will be harmed by the Draft Permit. And Mr. Doyle has concerns about the effect of the draft permit on the receiving waters, odor related to the plant, and the impact of the treatment plant on land values. Mr. Doyle is also concerned that with increased flow in the creek due to the wastewater discharge, he will no longer be able to get to the other side of his property without significant driving and delay. LCRA also regularly uses the creek crossing on Mr. Doyle's property. Mr. Doyle's phone number is 512-213-7267, and his email is jldoyle_1969@yahoo.com.

For these reasons, SMRF is an "affected person" entitled to a contested case hearing on the application and Draft Permit. 30 T.A.C. § 55.205

I. The TCEQ Executive Director Did Not Sufficiently Address the Issues Raised by SMRF, and SMRF Requests a Contested Case Hearing on These Issues.

SMRF remains concerned about the impacts of the Draft Permit on the receiving waters in light of, and among other concerns, the high levels of nutrients in the wastewater effluent. The following relevant and material issues were timely raised by SMRF during the comment period for the Draft Permit and were not sufficiently addressed by the TCEQ Executive Director ("ED"). SMRF reiterates the concerns and comments raised during the comment period as the basis for this request for a contested case hearing, and to further show that the ED did not adequately address SMRF's comments.

These issues were raised by SMRF and were not adequately addressed in the ED's Response to Comments ("RTC"):

1. Whether the draft permit complies with the Texas Surface Water Quality Standards.
2. Whether the draft permit complies with applicable antidegradation rules.
3. Whether the draft permit is protective of wildlife.
4. Whether the draft permit is protective of human health.

This request for Contested Case Hearing identifies specific comments made by SMRF related to the above issues (as numbered by the ED), the ED's corresponding response in her RTC, and the factual basis of each dispute, as well as any related disputed issues of law.

Issue 1: Whether the draft permit complies with the Texas Surface Water Quality Standards.

Comments 5, 6, 8.

SMRF commented that in order to comply with Texas Surface Water Quality Standards, the draft permit must have more strict effluent limitations. The effluent limitations must be no less

stringent than 5 mg/L 5-day Carbonaceous Biochemical Oxygen Demand (CBOD5), 5 mg/L Total Suspended Solids (TSS), 2 mg/L ammonia nitrogen, and 0.5 mg/L Total Phosphorus (TP), although lower would of course be better. SMRF also commented that it was concerned about nutrients and bacteria in the wastewater. SMRF also commented that the draft permit would violate the Texas Surface Water Quality Standards.

In response, the ED stated that the Draft Permit was developed to comply with applicable water quality standards. The ED's response is inadequate because the response did not contain any justification, beyond vague assertions that TCEQ screened the draft permit, to conclude that the Draft Permit will in fact comply with the Texas Surface Water Quality Standards. The ED also failed to address the studies submitted by SMRF that discuss the ways that nutrient pollution can lead to violations of Texas Surface Water Quality Standards and other issues raised by SMRF.

Issue 2: Whether the draft permit complies with applicable antidegradation rules.

Comment 7.

SMRF commented that the draft permit would degrade water quality in Plum Creek and violate TCEQ's Tier 1 and Tier 2 antidegradation standards while citing to scientific studies showing that increased nutrient concentrations in streams like the receiving waters leads to degradation of water quality.

The ED responded by reciting the effluent limitations for the draft permit and concluding, without evidence, that the limitations in the draft permit would protect water quality. The ED also collapsed the Tier 1 and Tier 2 antidegradation standard into one analysis for dissolved oxygen. The ED's response is inadequate because it failed to address the studies submitted by SMRF showing that water quality degradation will occur as a result of the draft permit and because the response impermissibly collapsed the Tier 1 and Tier 2 antidegradation standard for dissolved oxygen.

Issue 3: Whether the draft permit is protective of wildlife.

Comments 4, 10.

SMRF commented that without a limit on total nitrogen, the level of nitrates in the discharged wastewater could be harmful to wildlife. SMRF also commented that more stringent effluent limitations were needed to protect wildlife. Additionally, SMRF commented that UV disinfection should be used instead of chlorine to protect wildlife.

The ED responded to comments about concerns about wildlife made by other groups and individuals. ED stated that since the regulations prevent a wastewater discharge from degrading the receiving waters, then the draft permit automatically complies with the regulations and will protect wildlife. The ED's response is inadequate because it failed to address SMRF's comments, and the response to the concerns raised by others failed to show that the draft permit would indeed be protective of wildlife. The ED did not address SMRF's concerns about the impact of chlorine on wildlife.

Issue 4: Whether the draft permit is protective of human health.

Comment 2.

SMRF commented that the draft permit must include more stringent effluent limitation in order to protect human health, including a limit on total nitrogen.

The ED responded to comments made about human health concerns from other individuals but did not respond to or acknowledge SMRF's concerns or recommendation. The ED's response is inadequate because it failed to address SMRF's comments, and the response to other's concerns about human health simply parroted the regulatory requirements. While the ED did mention SMRF's concerns with nitrogen in response to comment 6, the response failed to address the human health concerns associated with nitrogen in wastewater.

I. Conclusion.

SMRF respectfully requests a contested case hearing on the application and draft permit of Greenwood Ventures Group, LLC for new proposed TPDES Permit No. WQ0016148001. SMRF requests that the TCEQ Commissioners refer the case to the State Office of Administrative Hearings on the issues listed and discussed above. SMRF continues to urge the Applicant and TCEQ to provide for the re-use of wastewater effluent and/or to apply for a TLAP permit to avoid the discharge of treated sewage into the sensitive receiving waters.

Thank you for considering SMRF's comments and concerns associated with the application and draft permit and for considering SMRF's Contested Case Hearing Request. Please use the contact information below for all communications with SMRF on this matter.

Sincerely,
/s/ Victoria Rose
Victoria Ann Rose
State Bar No. 24131088
victoria@sosalliance.org

Bill Bunch
State Bar No. 03342520
bill@sosalliance.org

Save Our Springs Alliance
4701 Westgate Blvd.
Bldg. D, Suite 401
Austin, Texas 78745
Tel.: 512-477-2320
Fax: 512-477-6410

Attorneys for San Marcos River Foundation

TCEQ Registration Form

March 28, 2023

Greenwood Ventures Group LLC TPDES PERMIT FOR MUNICIPAL WASTEWATER PERMIT NO. WQ0016148001

PLEASE PRINT

Name: Virginia Parker

Mailing Address: P.O. Box 1393, San Marcos TX 78667

Physical Address (if different): 1061 Martindale Falls Rd

City/State: _____ Zip: _____

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

Email: virginia@sanmarcosriver.org

Phone Number: (210) 860-4515

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

If yes, which one? San Marcos River Foundation

☒ 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.

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

March 28, 2023

Via: Online Submission Form

RE: Application and Draft Permit of Greenwood Ventures Group LLC, for new TPDES Permit No. WQ0016148001

Dear Ms. Gharis:

These comments are submitted on behalf of San Marcos River Foundation (SMRF), regarding the Application and Draft Permit of Greenwood Venture Group LLC, for new TPDES Permit No. WQ0016148001.

Greenwood Ventures LLC has applied for a new TPDES Permit WQ0016148001 (“the Draft Permit”) to authorize the discharge of 975,000 gallons per day of wastewater into an unnamed tributary, thence to another unnamed tributary, thence to West Fork Plum Creek, thence to Plum Creek in Segment 1810 of the Guadalupe River Basin. West Fork Plum Creek and Plum Creek are designated as having high aquatic life use.

Plum Creek itself has long been a valued resource for those living in its watershed and is home to a diverse array of mammals and birds. However, this beloved resource is at risk from the increased pressures posed by rapid development and the associated water pollution. And because of these pressures, portions of Plum Creek are listed as impaired in the Texas Integrated Water Report and Plum Creek has concerns for *E. coli*, ammonia nitrogen, and total phosphorus, that is pollutants commonly found in wastewater. With the water quality in the Plum Creek watershed already threatened by urbanization and other wastewater discharge permits, TCEQ cannot allow the applicant to discharge almost a million gallons of wastewater per day that contains high levels pollutants of concern into the Plum Creek watershed without violating TCEQ regulations and the Clean Water Act.

To protect water quality in the Plum Creek watershed, the Draft Permit must contain effluent limits no less stringent than 5 mg/L CBOD, 5 mg/L TSS, 2 mg/L Ammonia Nitrogen and 0.5 mg/L Total Phosphorus. The negative impacts of these pollutants in wastewater effluent on receiving waterbodies are well documented, and elevated levels of Carbonaceous Biochemical Oxygen Demand (CBOD), Total Suspended Solids (TSS), nitrogen and phosphorus from treated wastewater causes increased algal growth, proliferation of cyanotoxins, and increased murkiness in water. U.S. ENVIRONMENTAL PROTECTION AGENCY, A COMPILATION OF COST DATA

RECEIVED

MAR 28 2023

AT PUBLIC MEETING

ASSOCIATED WITH THE IMPACTS AND CONTROL OF NUTRIENT POLLUTION (2015).¹ Recent studies in nearby waterways have also demonstrated the connection between nutrient pollution from wastewater effluent and increased nuisance algae and significant shifts in aquatic biological assemblages. KING ET AL, BIOASSESSMENT OF FOUR HILL COUNTRY STREAMS THREATENED BY PROPOSED MUNICIPAL WASTEWATER DISCHARGES (2020). Since Plum Creek is already under stress from nutrient pollution, the Draft Permit, without more stringent effluent limitations on key pollutants such as phosphorus and nitrogen, will lower water quality in the Plum Creek watershed. Moreover, the current Draft Permit will violate the Tier 2 antidegradation standard by degrading water quality, violate the Tier 1 antidegradation standard by impairing uses, and violate the other Texas Surface Water Quality Standards.

The Draft Permit must include a more stringent effluent limitation for total phosphorus in order to avoid degradation of water quality in Plum Creek and harm to wildlife and humans. The Plum Creek Watershed Partnership has identified the screening criteria for total phosphorus as 0.69 mg/L. THE PLUM CREEK WATERSHED PARTNERSHIP, PLUM CREEK WATERSHED PROTECTION PLAN (2008). However, the applicant has requested no limit on total phosphorus for the Draft Permit. A lack of a total phosphorus effluent limitation will lead to phosphorus concentrations that are much higher than the identified screening criteria. The absence of a total phosphorus limit is also particularly concerning since the Applicant will be permitted to discharge nearly 1 million gallons per day into a stream that has little assimilative capacity for additional nutrients. The Draft Permit, as is, leaves Plum Creek at high risk for excessive growth of algae and aquatic plants, damage to aquatic habitat, fish kills, and loss of recreational opportunities.

In addition to more stringent effluent limitations for total phosphorus, the Draft Permit also needs to include a limit on total nitrogen to adequately protect against adverse ecological and human health effects. Although the Draft Permit has a limit on ammonia nitrogen, studies show that this is not an effective surrogate for controlling other forms of nitrogen in wastewater, including nitrates. Exposure to nitrates in humans can lead to a potentially fatal condition in infants known as blue baby syndrome, and exposure to nitrates in livestock and wildlife can lead to nitrate toxicity. Moreover, the EPA has set maximum contaminant levels for nitrates in drinking water at 10 mg/L. Although potable water suppliers are responsible for treating drinking water to the applicable standards, recreational users of the receiving waters may ingest raw water unintentionally. High levels of nitrates in wastewater also leave wildlife at risk from the well document risks associated with excessive nitrate consumption. Isaza et al., *Living in Polluted Waters: A Meta-Analysis of the Effects of Nitrate and Interactions with Other Environmental Stressors on Freshwater Taxa*, 261 ENVIRONMENTAL POLLUTION 1 (2020).

The Applicant and TCEQ should also reduce the amount of *E. coli* colony forming units permitted by the Draft Permit. The Draft Permit currently allows 126 CFU, which is part of the limit under Texas Surface Water Quality Standards for contact recreation uses. However, Plum

¹ U.S. Environmental Protection Agency, *Indicators: Phosphorus*, (last visited May 5, 2022) <https://www.epa.gov/national-aquatic-resource-surveys/indicators-phosphorus>; USGS, *Phosphorus and Water*, (last visited May 5, 2022) <https://www.usgs.gov/special-topics/water-science-school/science/phosphorus-and-water>.

Creek is already close to exceeding these limits. THE PLUM CREEK WATERSHED PARTNERSHIP, PLUM CREEK WATERSHED PROTECTION PLAN (2008). Permitting the discharge of wastewater effluent containing such high levels of *E. coli* places Plum Creek at high risk of not supporting its designated use of contact recreation in violation of the Tier 1 antidegradation standard. SMRF also asks that the Applicant and TCEQ choose a UV disinfection technique for the wastewater treatment process to avoid the discharge of chlorine and chlorine residue into the receiving waters and to avoid the negative impacts on wildlife and stream uses associated with the use of chlorine.

SMRF is also concerned about the adequacy of the notice provided for the Draft Permit. On the map in Appendix B of the application, it looks like the wastewater will flow into "N Fork Plum Creek" within one mile of the discharge point. However, this was not identified in the discharge route in the provided notices for the Draft Permit.

SMRF believes that more stringent effluent limitations or a zero-discharge system would alleviate many of the issues mentioned in this comment letter. 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 rather than allowing the treated sewage to pollute the waters of the Plum Creek Watershed.

For the above reasons, SMRF opposes the proposed Draft Permit TPDES Permit No. WQ0016148001 and asks that the application be denied. Thank you for considering our comments and allowing us to express our 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

Virginia Parker
Executive Director
San Marcos River Foundation
P.O. Box 1393
San Marcos, Texas 78667
Tel.: 512-353-4628
virginia@sanmarcosriver.org

Ellie Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, March 29, 2023 11:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016148001
Attachments: Greenwood Ventures West Plum Creek Permit Comments.docx

From: virginia@sanmarcosriver.org <virginia@sanmarcosriver.org>
Sent: Tuesday, March 28, 2023 3:34 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: Virginia Parker

EMAIL: virginia@sanmarcosriver.org

COMPANY: San Marcos River Foundation

ADDRESS: 1061 MARTINDALE FALLS RD
MARTINDALE TX 78655-2536

PHONE: 2108604575

FAX:

COMMENTS: Laurie Gharis March 28, 2023 Chief Clerk Texas Commission on Environmental Quality P.O. Box 13087 – MC 105 Austin, Texas 787011 – 3087 Via: Online Submission Form RE: Application and Draft Permit of Greenwood Ventures Group LLC, for new TPDES Permit No. WQ0016148001 Dear Ms. Gharis: These comments are submitted on behalf of San Marcos River Foundation (SMRF), regarding the Application and Draft Permit of Greenwood Venture Group

LLC, for new TPDES Permit No. WQ0016148001. Greenwood Ventures LLC has applied for a new TPDES Permit WQ0016148001 ("the Draft Permit") to authorize the discharge of 975,000 gallons per day of wastewater into an unnamed tributary, thence to another unnamed tributary, thence to West Fork Plum Creek, thence to Plum Creek in Segment 1810 of the Guadalupe River Basin. West Fork Plum Creek and Plum Creek are designated as having high aquatic life use. Plum Creek itself has long been a valued resource for those living in its watershed and is home to a diverse array of mammals and birds. However, this beloved resource is at risk from the increased pressures posed by rapid development and the associated water pollution. And because of these pressures, portions of Plum Creek are listed as impaired in the Texas Integrated Water Report and Plum Creek has concerns for E. coli, ammonia nitrogen, and total phosphorus, that is pollutants commonly found in wastewater. With the water quality in the Plum Creek watershed already threatened by urbanization and other wastewater discharge permits, TCEQ cannot allow the applicant to discharge almost a million gallons of wastewater per day that contains high levels pollutants of concern into the Plum Creek watershed without violating TCEQ regulations and the Clean Water Act. To protect water quality in the Plum Creek watershed, the Draft Permit must contain effluent limits no less stringent than 5 mg/L CBOD, 5 mg/L TSS, 2 mg/L Ammonia Nitrogen and 0.5 mg/L Total Phosphorus. The negative impacts of these pollutants in wastewater effluent on receiving waterbodies are well documented, and elevated levels of Carbonaceous Biochemical Oxygen Demand (CBOD), Total Suspended Solids (TSS), nitrogen and phosphorus from treated wastewater causes increased algal growth, proliferation of cyanotoxins, and increased murkiness in water. U.S. ENVIRONMENTAL PROTECTION AGENCY, A COMPILATION OF COST DATA ASSOCIATED WITH THE IMPACTS AND CONTROL OF NUTRIENT POLLUTION (2015). 1 Recent studies in nearby waterways 1 U.S. Environmental Protection Agency, Indicators: Phosphorus, (last visited May 5, 2022) <https://www.epa.gov/national-aquatic-resource-surveys/indicators-phosphorus>; USGS, Phosphorus and Water, (last visited May 5, 2022) <https://www.usgs.gov/special-topics/water-science-school/science/phosphorus-and-water>. have also demonstrated the connection between nutrient pollution from wastewater effluent and increased nuisance algae and significant shifts in aquatic biological assemblages. KING ET AL, BIOASSESSMENT OF FOUR HILL COUNTRY STREAMS THREATENED BY PROPOSED MUNICIPAL WASTEWATER DISCHARGES (2020). Since Plum Creek is already under stress from nutrient pollution, the Draft Permit, without more stringent effluent limitations on key pollutants such as phosphorus and nitrogen, will lower water quality in the Plum Creek watershed. Moreover, the current Draft Permit will violate the Tier 2 antidegradation standard by degrading water quality, violate the Tier 1 antidegradation standard by impairing uses, and violate the other Texas Surface Water Quality Standards. The Draft Permit must include a more stringent effluent limitation for total phosphorus in order to avoid degradation of water quality in Plum Creek and harm to wildlife and humans. The Plum Creek Watershed Partnership has identified the screening criteria for total phosphorus as 0.69 mg/L. THE PLUM CREEK WATERSHED PARTNERSHIP, PLUM CREEK WATERSHED PROTECTION PLAN (2008). However, the applicant has requested no limit on total phosphorus for the Draft Permit. A lack of a total phosphorus effluent limitation will lead to phosphorus concentrations that are much higher than the identified screening criteria. The absence of a total phosphorus limit is also particularly concerning since the Applicant will be permitted to discharge nearly 1 million gallons per day into a stream that has little assimilative capacity for additional nutrients. The Draft Permit, as is, leaves Plum Creek at high risk for excessive growth of algae and aquatic plants, damage to aquatic habitat, fish kills, and loss of recreational opportunities. In addition to more stringent effluent limitations for total phosphorus, the Draft Permit also needs to include a limit on total nitrogen to adequately protect against adverse ecological and human health effects. Although the Draft Permit has a limit on ammonia nitrogen, studies show that this is not an effective surrogate for controlling other forms of nitrogen in wastewater, including nitrates. Exposure to nitrates in humans can lead to a potentially fatal condition in infants known as blue baby syndrome, and exposure to nitrates in livestock and wildlife can lead to nitrate toxicity. Moreover, the EPA has set maximum contaminant levels for nitrates in drinking water at 10 mg/L. Although potable water suppliers are responsible for treating drinking water to the applicable standards, recreational users of the receiving waters may ingest raw water unintentionally. High levels of nitrates in wastewater also leave wildlife at risk from the well document risks associated with excessive nitrate consumption. Isaza et al., Living in Polluted Waters: A Meta-Analysis of the Effects of Nitrate and Interactions with Other Environmental Stressors on Freshwater Taxa, 261 ENVIRONMENTAL POLLUTION 1 (2020). The Applicant and TCEQ should also reduce the amount of E. coli colony forming units permitted by the Draft Permit. The Draft Permit currently allows 126 CFU, which is part of the limit under Texas Surface Water Quality Standards for contact recreation uses. However, Plum Creek is already close to exceeding these limits. THE PLUM CREEK WATERSHED PARTNERSHIP, PLUM CREEK WATERSHED PROTECTION PLAN (2008). Permitting the discharge of wastewater effluent containing such high levels of E. coli places Plum Creek at high risk of not supporting its designated use of contact recreation in violation of the Tier 1

antidegradation standard. SMRF also asks that the Applicant and TCEQ choose a UV disinfection technique for the wastewater treatment process to avoid the discharge of chlorine and chlorine residue into the receiving waters and to avoid the negative impacts on wildlife and stream uses associated with the use of chlorine. SMRF is also concerned about the adequacy of the notice provided for the Draft Permit. On the map in Appendix B of the application, it looks like the wastewater will flow into "N Fork Plum Creek" within one mile of the discharge point. However, this was not identified in the discharge route in the provided notices for the Draft Permit. SMRF believes that more stringent effluent limitations or a zero-discharge system would alleviate many of the issues mentioned in this comment letter. 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 rather than allowing the treated sewage to pollute the waters of the Plum Creek Watershed. For the above reasons, SMRF opposes the proposed Draft Permit TPDES Permit No. WQ0016148001 and asks that the application be denied. Thank you for considering our comments and allowing us to express our 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 Virginia Parker Executive Director San Marcos River Foundation P.O. Box 1393 San Marcos, Texas 78667 Tel.: 512-353-4628 virginia@sanmarcosriver.org

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

March 28, 2023

Via: Online Submission Form

RE: Application and Draft Permit of Greenwood Ventures Group LLC, for new TPDES Permit No. WQ0016148001

Dear Ms. Gharis:

These comments are submitted on behalf of San Marcos River Foundation (SMRF), regarding the Application and Draft Permit of Greenwood Venture Group LLC, for new TPDES Permit No. WQ0016148001.

Greenwood Ventures LLC has applied for a new TPDES Permit WQ0016148001 (“the Draft Permit”) to authorize the discharge of 975,000 gallons per day of wastewater into an unnamed tributary, thence to another unnamed tributary, thence to West Fork Plum Creek, thence to Plum Creek in Segment 1810 of the Guadalupe River Basin. West Fork Plum Creek and Plum Creek are designated as having high aquatic life use.

Plum Creek itself has long been a valued resource for those living in its watershed and is home to a diverse array of mammals and birds. However, this beloved resource is at risk from the increased pressures posed by rapid development and the associated water pollution. And because of these pressures, portions of Plum Creek are listed as impaired in the Texas Integrated Water Report and Plum Creek has concerns for *E. coli*, ammonia nitrogen, and total phosphorus, that is pollutants commonly found in wastewater. With the water quality in the Plum Creek watershed already threatened by urbanization and other wastewater discharge permits, TCEQ cannot allow the applicant to discharge almost a million gallons of wastewater per day that contains high levels pollutants of concern into the Plum Creek watershed without violating TCEQ regulations and the Clean Water Act.

To protect water quality in the Plum Creek watershed, the Draft Permit must contain effluent limits no less stringent than 5 mg/L CBOD, 5 mg/L TSS, 2 mg/L Ammonia Nitrogen and 0.5 mg/L Total Phosphorus. The negative impacts of these pollutants in wastewater effluent on receiving waterbodies are well documented, and elevated levels of Carbonaceous Biochemical Oxygen Demand (CBOD), Total Suspended Solids (TSS), nitrogen and phosphorus from treated wastewater causes increased algal growth, proliferation of cyanotoxins, and increased murkiness in water. U.S. ENVIRONMENTAL PROTECTION AGENCY, A COMPILATION OF COST DATA

ASSOCIATED WITH THE IMPACTS AND CONTROL OF NUTRIENT POLLUTION (2015).¹ Recent studies in nearby waterways have also demonstrated the connection between nutrient pollution from wastewater effluent and increased nuisance algae and significant shifts in aquatic biological assemblages. KING ET AL, BIOASSESSMENT OF FOUR HILL COUNTRY STREAMS THREATENED BY PROPOSED MUNICIPAL WASTEWATER DISCHARGES (2020). Since Plum Creek is already under stress from nutrient pollution, the Draft Permit, without more stringent effluent limitations on key pollutants such as phosphorus and nitrogen, will lower water quality in the Plum Creek watershed. Moreover, the current Draft Permit will violate the Tier 2 antidegradation standard by degrading water quality, violate the Tier 1 antidegradation standard by impairing uses, and violate the other Texas Surface Water Quality Standards.

The Draft Permit must include a more stringent effluent limitation for total phosphorus in order to avoid degradation of water quality in Plum Creek and harm to wildlife and humans. The Plum Creek Watershed Partnership has identified the screening criteria for total phosphorus as 0.69 mg/L. THE PLUM CREEK WATERSHED PARTNERSHIP, PLUM CREEK WATERSHED PROTECTION PLAN (2008). However, the applicant has requested no limit on total phosphorus for the Draft Permit. A lack of a total phosphorus effluent limitation will lead to phosphorus concentrations that are much higher than the identified screening criteria. The absence of a total phosphorus limit is also particularly concerning since the Applicant will be permitted to discharge nearly 1 million gallons per day into a stream that has little assimilative capacity for additional nutrients. The Draft Permit, as is, leaves Plum Creek at high risk for excessive growth of algae and aquatic plants, damage to aquatic habitat, fish kills, and loss of recreational opportunities.

In addition to more stringent effluent limitations for total phosphorus, the Draft Permit also needs to include a limit on total nitrogen to adequately protect against adverse ecological and human health effects. Although the Draft Permit has a limit on ammonia nitrogen, studies show that this is not an effective surrogate for controlling other forms of nitrogen in wastewater, including nitrates. Exposure to nitrates in humans can lead to a potentially fatal condition in infants known as blue baby syndrome, and exposure to nitrates in livestock and wildlife can lead to nitrate toxicity. Moreover, the EPA has set maximum contaminant levels for nitrates in drinking water at 10 mg/L. Although potable water suppliers are responsible for treating drinking water to the applicable standards, recreational users of the receiving waters may ingest raw water unintentionally. High levels of nitrates in wastewater also leave wildlife at risk from the well document risks associated with excessive nitrate consumption. Isaza et al., *Living in Polluted Waters: A Meta-Analysis of the Effects of Nitrate and Interactions with Other Environmental Stressors on Freshwater Taxa*, 261 ENVIRONMENTAL POLLUTION 1 (2020).

The Applicant and TCEQ should also reduce the amount of *E. coli* colony forming units permitted by the Draft Permit. The Draft Permit currently allows 126 CFU, which is part of the limit under Texas Surface Water Quality Standards for contact recreation uses. However, Plum

¹ U.S. Environmental Protection Agency, *Indicators: Phosphorus*, (last visited May 5, 2022)

<https://www.epa.gov/national-aquatic-resource-surveys/indicators-phosphorus>; USGS, *Phosphorus and Water*, (last visited May 5, 2022) <https://www.usgs.gov/special-topics/water-science-school/science/phosphorus-and-water>.

Creek is already close to exceeding these limits. THE PLUM CREEK WATERSHED PARTNERSHIP, PLUM CREEK WATERSHED PROTECTION PLAN (2008). Permitting the discharge of wastewater effluent containing such high levels of *E. coli* places Plum Creek at high risk of not supporting its designated use of contact recreation in violation of the Tier 1 antidegradation standard. SMRF also asks that the Applicant and TCEQ choose a UV disinfection technique for the wastewater treatment process to avoid the discharge of chlorine and chlorine residue into the receiving waters and to avoid the negative impacts on wildlife and stream uses associated with the use of chlorine.

SMRF is also concerned about the adequacy of the notice provided for the Draft Permit. On the map in Appendix B of the application, it looks like the wastewater will flow into "N Fork Plum Creek" within one mile of the discharge point. However, this was not identified in the discharge route in the provided notices for the Draft Permit.

SMRF believes that more stringent effluent limitations or a zero-discharge system would alleviate many of the issues mentioned in this comment letter. 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 rather than allowing the treated sewage to pollute the waters of the Plum Creek Watershed.

For the above reasons, SMRF opposes the proposed Draft Permit TPDES Permit No. WQ0016148001 and asks that the application be denied. Thank you for considering our comments and allowing us to express our 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

Virginia Parker
Executive Director
San Marcos River Foundation
P.O. Box 1393
San Marcos, Texas 78667
Tel.: 512-353-4628
virginia@sanmarcosriver.org

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Friday, October 14, 2022 3:07 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016148001

H

From: erin_a_stephens@yahoo.com <erin_a_stephens@yahoo.com>
Sent: Friday, October 14, 2022 2:25 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: Erin A Stephens

EMAIL: erin_a_stephens@yahoo.com

COMPANY: Sola Fe Ranch LLC

ADDRESS: 680 WESTWOOD RD
LOCKHART TX 78644-4699

PHONE: 5122271799

FAX:

COMMENTS: Hello, We own a larger piece of land neighboring on the north side of the proposed development and waste plant as well as our home and headquarters on Westwood Road. We are very concerned about this proposed development in whole but today I am addressing specifically the serious concerns about the environmental impact of such a large scale plant and development. First, where will they get the water from? Second, what will the impact be putting so much water and waste into west fork and plum creek? The infringement to natural habitat and wildlife at the

site of the plant and down stream is a concern. Specifically erosion of natural waterways, quality of drinking water for wildlife, air solution from toxic hydrogen sulfite gases, and increased traffic and lights, . West fork and plum creek are important areas with less development providing forage and water to wildlife and livestock. The smell from the operation of the plant and hazardous accidents are of serious concern as well. As neighboring properties we are at risk to have lower valuation of our ag lands and homes with such an intrusive grasshopper development. Plopping a high density development in the middle of rural properties is unethical development of our lands. This development is strongly opposed and we request a public hearing be held. Thanks, Colby and Erin Stephens

TCEQ Registration Form

June 13, 2023

6

Greenwood Ventures Group LLC Proposed TPDES Permit No. WQ0016148001

PLEASE PRINT

Name: Colby Stephens

Mailing Address: 680 Westwood Rd. Lockhart, TX 78644

Physical Address (if different): _____

City/State: Lockhart TX Zip: 78644

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

Email: stephenscolby@yahoo.com

Phone Number: (512) 787-9477

- 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.

TCEQ Registration Form

March 28, 2023

Greenwood Ventures Group LLC TPDES PERMIT FOR MUNICIPAL WASTEWATER PERMIT NO. WQ0016148001

PLEASE PRINT

Name: Erin Stephens

Mailing Address: 680 Westwood Rd

Physical Address (if different): _____

City/State: Lockhart TX Zip: 78644

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

Email: erin-a-stephens@yahoo.com

Phone Number: (512) 227-1799

- 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.

WQ
128306

Debbie Zachary

From: PUBCOMMENT-OCC
Sent: Wednesday, June 29, 2022 2:37 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016148001

H

From: vinklarek@me.com <vinklarek@me.com>
Sent: Wednesday, June 29, 2022 2:24 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016148001

REGULATED ENTY NAME LOCKHART LANDING WWTP

RN NUMBER: RN111484846

PERMIT NUMBER: WQ0016148001

DOCKET NUMBER:

COUNTY: CALDWELL

PRINCIPAL NAME: GREENWOOD VENTURES GROUP LLC

CN NUMBER: CN606011039

FROM

NAME: Susan Vinklarek

EMAIL: vinklarek@me.com

COMPANY:

ADDRESS: 8901 BROOK HILL LN
FORT WORTH TX 76244-7683

PHONE: 5126808617

FAX:

COMMENTS: I oppose the approval of permit number: WQ0016148001. I oppose the construction of the wastewater treatment facility. I oppose the discharge of treated wastewater into any tributaries. It is my opinion that the Executive Director should not approve this permit and it should be referred for a contested case hearing.