

Texas Commission on Environmental Quality

Austin, Texas

May 12, 2024,

Docket No. 2024-0596-MWD

Subject: The Psalm 25:10 Foundation and TCCI Land Development Inc.

TCCI Land Development Inc. is looking to develop several hundred acres of into a subdivision with hundreds/thousands of homes as per their submittal. As part of their design and development of this plan the project will need a wastewater treatment facility installed to treat the wastewater created/discharged by these homes and the neighborhood. This development is basically a wastewater "manufacturing plant" that they want to treat and then send in a river going down stream for miles and into a lake. This seems the same as a company who chooses to make a product that discharge chemicals into a river that in 10,20 50 years leads to environmental and health consequences and concerns for the public, wildlife and the environment.

Having the wastewater treatment plant Donated by a nonprofit seems like a way/loophole to get away from being liable for any potential water quality or health issues and environmental/wildlife damages the plant and development could affect. If TCCI and Psalm 25:10 want to build this development and donate the treatment plant, they must own and be responsible for the life of this development from beginning and over the next 100 years. This should be Evergreen and stay with the companies, no matter if they are sold, acquired, merged, spun off, file for bankruptcy or any other ways to not be held liable for the development and treatment plant along with all the water generated and discharged by the development as well as the treatment plant.

We would like clear and documented clarification on who will be liable for wastewater being discharged daily and any environmental and water quality issues that arise due to this development for the next 100 years. Who will be liable for environment damages that could happen, and the cost associated? Who will be liable for compensation to the public for health issues if this wastewater discharge is part of what is causing the environmental and health issues/concerns to the public, wildlife, water and land over the next several decades.

Who will pay for the cost to maintain the wastewater plant and make necessary upgrades from either damage cause by mother nature, wear and tear as well as when the EPA makes updates and changes the acceptable effluent water quality leading to this plant needing upgrades to meet these new requirements?

Why isn't this plant being held to discharge to the most stringent effluent water standards just like if this plant was closer to the Edwards Aquifer area.

What will be the detailed design description of the treatment plant, the redundancy/backup/emergency plans to deal with challenges from mother nature such as tornadoes, loss of power, freezing weather and so on.

Thank you for your time on this matter!

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