

Vincent Redondo

From: PUBCOMMENT-OCC
Sent: Tuesday, February 20, 2024 9:17 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0010887003

RFR

From: christensen.kevinc@gmail.com <christensen.kevinc@gmail.com>
Sent: Monday, February 19, 2024 2:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0010887003

REGULATED ENTY NAME CITY OF JOSEPHINE WWTP NO 3

RN NUMBER: RN111735411

PERMIT NUMBER: WQ0010887003

DOCKET NUMBER:

COUNTY: COLLIN

PRINCIPAL NAME: CITY OF JOSEPHINE

CN NUMBER: CN600670178

NAME: Kevin Christensen

EMAIL: christensen.kevinc@gmail.com

COMPANY:

ADDRESS: 201 MONARCH LN
JOSEPHINE TX 75173-7152

PHONE: 7143831673

FAX:

COMMENTS: Hello, my name is Kevin Christensen. As a resident of Josephine, I am very concerned with the planned sewer / water treatment facility. My main two issues are odor, and runoff. We already have water treatment in the area, and depending on wind conditions, we all smell it. I have had many other residents voice their concerns with me during passing conversation. I am also concerned about the potential for more flooding. Many residents already have issues with flooding on their properties, and this would only serve to greatly exacerbate these issues. Josephine is one of the fastest growing cities in Texas, which means this is only going to increase the numbers of residents this would put at risk. I believe the best course of action would be to choose a different location for the facility, where it would not be near as

many residences. Perhaps somewhere farther north of the 380, or south of the 30. Those areas are far less dense, and many of those areas already have odor from farming. There is very little livestock farming in and around Josephine so we don't deal with any odors, except for the odor from the water treatment that we already have here. Unfortunately, many of the citizens, including myself, all feel as if the people making these decisions have no "skin in the game." The city administrator doesn't even live here, and it shows. These decisions are made without input from the public, and when the public does voice their concerns and displeasure, it falls on deaf ears. I hope you reconsider your options. Thank you for your time and consideration.

James Ridgway
5754 FM 6
Josephine, Tx 75189
Hunt County

7-2-2024

Reviewed By GWR

JUL 09 2024

RFR/H
CHIEF CLERKS OFFICE

2024 JUL -8 PM 2:37

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

**REQUEST FOR RECONSIDERATION AND A CONTESTED CASE HEARING ON
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
TPDES PERMIT NUMBER WQ0010887003**

Aurie Gharis, Chief Clerk
CEQ, MC 105
P O BOX 13087
Austin, TX 78711-3087

Name of Person Contesting:
Mailing Address:
Daytime Phone:
Fax Number:
Physical Property Location
and Homestead

James Ridgway
P O Box 127, Caddo Mills, TX 75135-0127
972-834-8686
None
5754 FM 6, Josephine, TX 75189 - Hunt County

Email: jridgway1971@gmail.com (no "e" in ridgway)
Applicant: City of Josephine - TPDES PERMIT NUMBER WQ0010887003

I am again requesting a contested case hearing and also reconsideration of July 17 letter Decision of the Executive Director. I am affected within a mile of the proposed facility. Wastewater runoff will be dispatched to the creek directly behind my neighbor's house which backs up to the creek. He lives directly behind my 2 acres. Water from creek seeps into surrounding ground.

ACT- In 2015 there were no subdivisions on FM6 in Hunt County. In 2024, there are 2 subdivisions on FM6 and two subdivisions on East St. "old Josephine" which dump wastewater into the creek, and when it rains the runoff floods in the properties to the east, mine included. If the flow increases .75MGD for a total of **.82MGD**, I can only see more water coming on my property and it becoming a FEMA zone A. More water on my property makes it. Historical Google Earth Maps and wastewater plan link in next paragraph support this.

ACT- see- https://www.cityofjosephinetx.com/pdf/Josephine_Wastewater%20Master%20Plan_Final_Signed.pdf **City Of Josephine Wastewater Master Plan Section 6.4 Lagoon Wastewater Treatment Plant - An additional .75 MGD.** The City of Josephine currently owns and operates a lagoon wastewater treatment plant. The treatment train includes an aeration oxidation tank and two mixed lagoons. The current permit allows for a daily average flow of 0.07 MGD. The WWTP is located in the northeast area of the city and existing flows from the west region of the city are lifted to the lagoon wastewater treatment plant. A project to expand the current wastewater treatment plant and add an **additional 0.75 MGD** treatment capacity is currently under design by DBI. DBI is also pursuing a new wastewater permit with the TCEQ. This master plan report assumes the 0.75 MGD addition will be incorporated onsite." This means my property will be taking on more water through the ground. This is more water than citizens were told will be going into the creek and my litigation will become worse, or property may become Zone A if not already, due to subdivision development, more houses equals more sewage.

ACT- Application was submitted without a current flood map for the building site. FEMA requires review every 5 years and this has not been done. City now requires LOMR maps, since 2023.

ACT - FEMA FLOOD MAPS ARE OUTDATED - <https://firststreet.org/research-library/understanding-fema-flood-maps-and-limitations> - TCEQ attempting to approve a permit with outdated and potentially incorrect information.

ACT- City has allowed the developer to build Magnolia Point MUD with FEMA MAP 48085C0460J Eff 6/2/2009 maps, & after a flooding of homes on FM 1777(822 East St, Josephine, TX, 75164, USA) during Waverly Development, LOMR maps LOMR 23-06-0194P eff 8/18/2023 and LOMR 23-06-1047P eff 5/6/2024 were required. <https://hazards-ma.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-131407548995618,33.04846476625197,-96.27253343673354,33.066448955590076>

THANK YOU
James Ridgway
7-2-24



magnolia
 ← fema 4808SC049J
 etp 6/2/2009

JT - City contracted for a Prelim Flood Study for the Public Safety Building - Kimley Horn IPO 20 - \$10,000. Then IPO 21 was approved along with other developer maps for \$94k to file the flood map. https://www.cityofjosephinetx.com/pdf/Agendas_Minutes/Minutes---City-Council-Meeting-July-10-2023---AMENDED.pdf "Doug Ewing made a motion to approve Individual Project Order (IPO) #21 between the City of Josephine and Kimley-Horn and Associates for a Conditional Letter of Map Revision, Fully Developed Floodplain Study, and Letter of Map Revision for the proposed site of the new Public Safety Building Project located on the northwest corner of FM 6 and Main Street in a projected amount of \$94,700 to be paid from funds previously set aside for the project. Seconded by Joyce Miller. All in favor, the motion carried." Conditional action-See 8/14/2023 City Council Agenda https://www.cityofjosephinetx.com/pdf/Agendas_Minutes/Minutes---City-Council-Meeting-August-14-2023.pdf, under Consent Agenda - Kimley-Horn Engineering Status Report- PROJECTS- 064611431 - PUBLIC SAFETY BUILDING FLOOD STUDY - Performing updates to existing and conceptual proposed condition model based on on-ground survey. Kick off ESA. Awaiting proposed grading of project site.

The city should adhere to their rules for all construction. - CITY OF JOSEPHINE SUBDIVISION ORDINANCE

<https://www.cityofjosephinetx.com/pdf/City-of-Josephine-Subdivision-Regulations-Approved-6-6-15.pdf> -" Section 3.10: Storm Water Collection and Conveyance Systems, Item C- No person, individual, partnership, firm or corporation shall deepen, widen, fill, reclaim, reroute, change the course or location of any existing ditch, channel, stream or drainage way without first obtaining written permission of the City Engineer and any other applicable agency (such as FEMA or the U.S. Army Corps of Engineers) having jurisdiction. The City Engineer may, in his or her discretion, require preparation and submission of a flood study for a proposed development if there are concerns regarding storm drainage on the subject property or upstream or downstream from the subject property. The costs of such study, if required, shall be borne by the developer." My observation is that this would mean the city.

JT - There has been no flood study for the site for the sewer plant. The city and TCEQ are/will be making decisions based on 15 years old data.

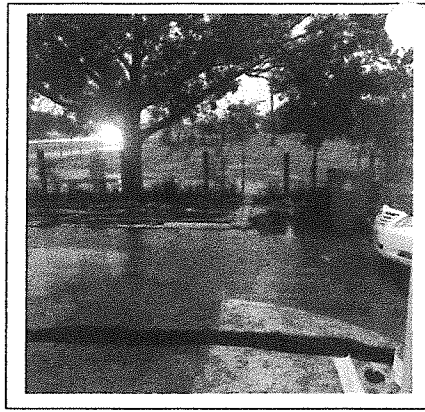
JT- There is no Flood Mitigation plan for the city. On 9-12-2022 there was an item to "Discuss, consider, and act on Resolution No. 2022-12 adopting the 2022 Collin County Hazard Mitigation Plan." Details under Josephine Texas show Josephine having a higher rate of flooding, which flows down into HUNT CO, where residents in the discharge path are. There is not a solid plan for flooding, or for critical infrastructure in the Collin County Hazard Mitigation Plan. There is NO flood mitigation for the HUNT COUNTY side of Josephine.

Collin County Hazard Mitigation Action Plan

Location	Residential Parcels located in the 100-year Floodplain	Percentage of Total Residential Parcels located in the 100-year Floodplain	Commercial and Utility parcels in the 100-year Floodplain	Percentage of Commercial and Utility Parcels in the 100-year Floodplain
Don	350	1.13%	71	6.31%
Anna	139	1.82%	8	3.56%
Ridge	18	3.65%	3	4.17%
Alma	332	4.16%	22	8.43%
View	260	7.52%	2	2.02%
Orville	79	5.25%	21	7.00%
Isco	410	1.22%	142	7.28%
Josephine	92	10.13%	23	60.53%

JT - City Council Minutes 7-8-2019 - Closed city and county roads due to high water. This was not in the 2022 Hazard Mitigation Plan. As a former CISD Bus Monitor, I have observed Caddo Street flooded. 620 Caddo St. is address of the sewer plant.

request for a contested hearing is because my home is coded Zone X on FEMA MAP . It did not flood in 2015 when the rest of the city had flooding or in 2019. This year my property began to take on more water than in past years. **See photos next page**



Developments causing more water-this will be issue for sewer plant as well



the current wastewater lagoon system is .07MGD. Evidently this was missed on my first submission by reviewers and I need to make sure this is understood. There has not been a current flood **map since 2009** in Josephine, **Collin County**. On the **Hunt County** side of Josephine, the last flood study was **2012** by my former neighbor behind my property who got flooded. In the area across the creek directly back of my neighbors home which is directly in back of my home, that is under development by DR HORTON has not had a flood study since 2009. When it rains, water dumps water into the creek from the "infrastructure in process". See photos below.

RESPONSE 1 - Certain People - Not understanding Mr.Hensley issue.

Challenge to RESPONSE 2 -I requested a contested hearing - My property has already taken on more water from the creek where the water flows during rainy season. This affects my safety (I'm 77) when I have to leave my home, is eroding my soil and causing me to have to mitigate manually and with limited funds this is not an easy task. It is affecting my health. Taking on more water will make my Zone X property Zone A. Items I have outlined below and above are fact and will back up my request to have a contested hearing.

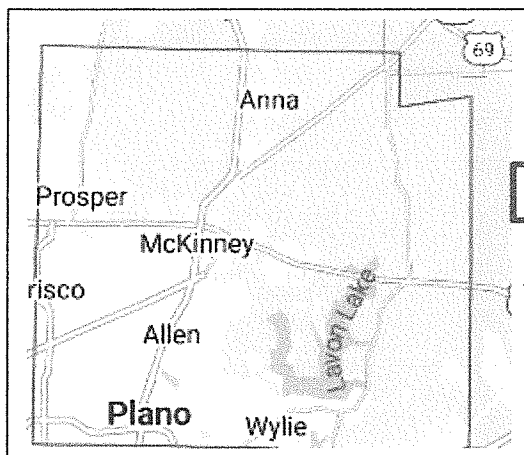
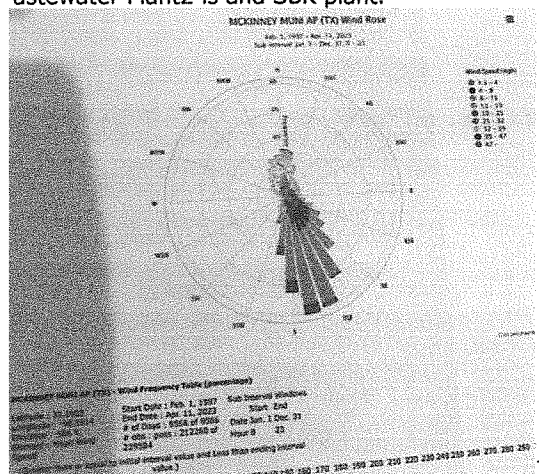
RESPONSE 3 – Not my issue

Challenge to RESPONSE 4 – Public Interest-Because not all landowners were notified (see list below on Comment 9), there was not a chance to get more public interest. The application explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility will discharge more effluent than is currently discharged.

due to the fact that more than 1000 homes are being built, commercial business, zoning for apartments and more dense housing has been proposed by the city. Additionally, the explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility will discharge more effluent than is currently discharged, due to the fact that more than 1000 homes are being built NOW IN 2024 and commercial business and zoning for apartments and more dense housing has been proposed by the city administrator, sanctioned by PZ & Council and is in the works. At the last zoning meeting a long time wastewater worker said we need to think about increasing now, and that means more money. The City needs to be transparent or at a minimum appear to be transparent.

challenge to RESPONSE 5 – Flooding- Though TCEQ contends they do not have jurisdiction to address flooding, TCEQ alludes to another requirement No 5.” that the city provide protection for the wastewater treatment facilities from the 100 year flood. There is no indication of how the city is going to protect the wastewater treatment from a 100 year flood in the application that we can see. There is no current flood study so to complete this requirement may be impossible for the city as they cannot gauge protection. If TCEQ provides an approval, **they will be providing approval without full knowledge.** City should conduct a FEMA flood study of land north of the sewer plant that is being developed currently because it will affect the sewer plant as other development in the city has affected my property. City could also conduct a flood study at a minimum in the area that is in the one mile area adjacent to the discharge route-see Landowner Map. TCEQ does work with FEMA re: https://www.tceq.texas.gov/assets/public/comm_exec/agendas/worksess/backup/2017-12-14/harvey.pdf. To preclude flooding TCEQ could lobby to work with FEMA to ensure flood maps are updated.

challenge to RESPONSE 6 – Air Pollution-Quality The EPA has already been called on the current sewer plant smell. The Windrose map from McKinney TX 25 miles from Josephine. The Wind blows SSE according to the Windrose provided and as it happens, Josephine is SSE from McKinney with approximate same winds 4-25 mph on any given day. The wind always blows here. My home is southeast of the current sewer and I smell it. Magnolia folks live south of the Josephine Wastewater Plant2 and they smell odors from it on some days. Josephine Wastewater Plant2 is and SBR plant.



challenge to RESPONSE 7 – Nuisance Odors- – see Response 6, but thank you for the phone numbers.

response 8 – Not mine to challenge

challenge to RESPONSE 9-Notices- No mailings received by most folks in Hunt County – Other permits have had mailings in addition to paper Publications – The list of landowners supplied **on the application** only included 2 landowners in Hunt Co from what I can tell, Bockmehl and Bass. The list on the application did not include others in Hunt County who were Kevin Bowman 5784 FM6, Brian, Lauren Towel (Harrell) 5333 FM 6 James Akers 5509 FM 6 Josephine 75164/Caddo Mills 75135, Debra McCorkle, 5521 FM 6, Jay & Rochelle Wildfong, 5497 FM 6, Aaron, 5475 FM 6, Lauren Harrell 5533 FM 6, Christina Jones, 5569 FM 6 Fabiola/Juan Aguilar 5581 FM 6 Blanca Basinger, and of course me. The Discharge goes directly to landowners with “55” in their address.

challenge to RESPONSE 10 – application not totally correct – concerning Public Interest TCEQ-20960 form page 1 of 4

I believe the second checkbox on this page should be checked because this project does have considerable public interest since it is being paid for by Certificates of Obligation for a minimum of \$10m with the City getting ready to ask for more Certificates of Obligation or other public funding. **\$5,065,000 plus \$10,845,000** as of July 2022. – The third checkbox should be checked since Josephine is online as being in the FW area. See this-<https://www.bestplaces.net/city/texas/josephine>
The explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility will discharge more effluent than is currently discharged, due to the fact that more than 1000 homes are being built NOW IN 2024 and commercial business and zoning for apartments and more dense housing has been proposed by the city administrator, sanctioned by PZ & Council and is in the works. At the last zoning meeting a long time wastewater worker said we need to think about increasing now, and that means more money. The City needs to be transparent or at a minimum appear to be transparent.

TCEQ Form -10054 form page 8 of 80 Question 4 and 5 and 6 not answered. (Understand now this was not needed)

TCEQ Form -10054 form page 15 of 80 – checkboxes in Section 11, are not marked. Actually checkbox with “no” marked is incorrect. The city current lagoon road Caddo Street floods. The FEMA flood map shows Zone A directly below. This may be misunderstanding on my part but the Kimley Horn reports says both lagoon and SBR - **City Of Josephine Wastewater Master Plan Section 6.4 Lagoon Wastewater Treatment Plant – An additional .75 MGD**

ie 32 of .80 – C Waterbody aesthetics (of receiving water – Common setting: not offensive; developed by uncluttered, water may be colored turbid. Actually walking in the creek there is evidence of trash from the developer in the creek.



Different area

erent kind of insulation/trash going to creek



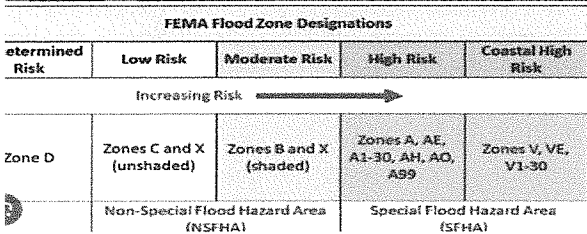
ment 11 – I understand the other respondents opposition.

Challenge to Comment 13-Wildlife - Wastewater will affect wildlife, TCEQ Response says that that **water** in the state is to be safe for humans, therefore it is safe for wildlife. However, it has been determined that water has PFAS. Nearly all municipal wastewater treatment plants have measurable levels of PFAS in their discharge. The vast majority of that PFAS comes from upstream sources — such as industries, household products, and human waste — and flows through the facilities. See link .

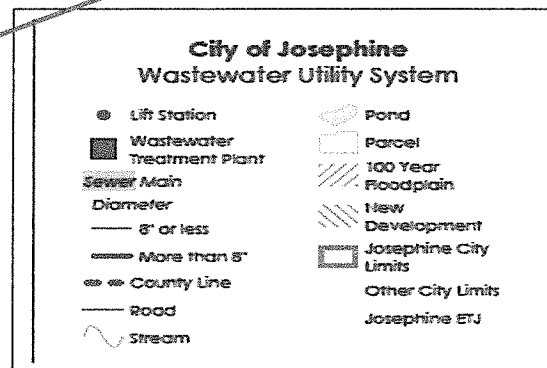
[s://www.tceq.texas.gov/assistance/resources/the-advocate-1/funding-available-for-pfas-and-emerging-contaminants](https://www.tceq.texas.gov/assistance/resources/the-advocate-1/funding-available-for-pfas-and-emerging-contaminants) (link broken)

[s://www.eea.europa.eu/en/about/contact-us/faqs/what-are-pfas-and-how-are-they-dangerous-for-my-health#:~:text=They%20are%20known%20as%20forever,Europe%20%E2%80%93%20PFAS%20for%20further%20information.](https://www.eea.europa.eu/en/about/contact-us/faqs/what-are-pfas-and-how-are-they-dangerous-for-my-health#:~:text=They%20are%20known%20as%20forever,Europe%20%E2%80%93%20PFAS%20for%20further%20information.)

Challenge to RESPONSE 14 – The applicant **only published the notice in the local Farmerville and Greenville papers AFTER** **gway notified** them they were not transparent. The subscription is cost to Collin County Commercial Record is cost prohibitive – 3 mo. , 6 mo.\$125,1yr\$200. Collin County Commercial Record is not the largest circulation, at least Dallas Morning News has been used in the ; so not sure why they chose the Collin County as per their website. Per the website – “The Collin County Commercial Record is an important source for **business leads**. These types of up-to-date legal and business leads are published each weekday. Call (214) 733-8489 subscribe today..” <http://collincountycommercialrecords.com/publications.html?mqiToken=yjwwptwd>



The map shows the Riverfield area with the Wastewater Treatment Plant located near CR 1003 and CR 89. The Riverfield area is shown with a hatched pattern. The Riverfield Tract 2 is also indicated. The Bridge Trl is shown at the bottom of the map. The map also shows the location of the Riverfield and the Riverfield Tract 2. The map includes labels for CR 1003, CR 89, CR 37, and the Bridge Trl. The map also shows the location of the Riverfield and the Riverfield Tract 2.



ause there has not been any flood mapping since 2012 in the are behind my home of the current sewer plant site, more houses PLUS
e usage equals more water in the creek daily and potential NTMWD monofil run-off (when implemented) gives an increased risk of adding
property to a zone A on FEMA flood map.

C



sh and flood fences fail in the light rain that has been experienced. What happens if the same conditions exist with future building north of city? Some of our city streets look like this . Trash in ditches.

use review document at this link – even the EPA recommends there needs to be flood mitigation for water and wastewater facilities.
https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf

Pollution –TCEQ needs to monitor the entire area Before the Magnolia/City of Josephine Wastewater 2 Plant, the waste stabilization d/anaerobic pond/existing lagoon treatment plant facility used by the City of Josephine on Caddo Street did not emit any odor we could ect at our property. The Fountain View subdivision located in the City of Josephine was diverted to the SBR Plant constructed by DR RTON, Magnolia MUD, and then given to the City contractually as City of Josephine Wastewater Plant 2. Currently that SBR plant which des in the Magnolia MUD housing area releases odor that I smell at my property less than a mile away. If this new SBR plant releases the re odor, at least more than 800 homes or more in the area will not be smelling fresh country air. **See my challenge to RESPONSE 6**

nted, TCEQ does not monitor air quality but the McKinney MUNI AP (TX) Wind Rose was included in the documentation, therefore one to conclude wind (and an assumed air quality)IS AN issue.

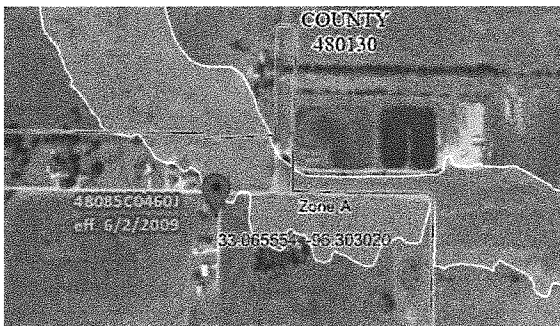
-environment The wooded Brushy Creek area behind my home houses hawks, birds, fowl, beaver, skunks, frogs, turtles, and more. ough chemicals treating sewer are not supposed to be harmful to fish, fowl, animals, an increase in the amount of flow may negate that ight. **See Challenge to Comment 13.**

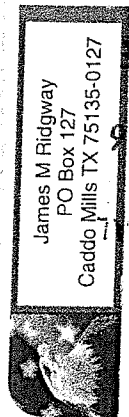
planation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not ate the fact that the new facility could/will discharge more effluent than is currently discharged, due to the fact that more than 1000 res are being built and commercial business and zoning for apartments and more dense housing has been proposed by the city inistrator.

itionally, I request to be placed on the permanent mailing list for the City of Josephine permit number WQ0010887003 or new permit umber.

nk you for your consideration.

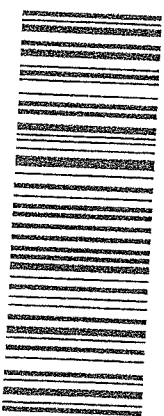
ies Ridgway





James M Ridgway
 PO Box 127
 Caddo Mills TX 75135-0127

TEXAS
 COMMISSION
 ON ENVIRONMENT
 QUALITY
 2024 JUL -8 PM 2:25
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RDC 99

Renee Lyle

10 279348

From: PUBCOMMENT-OCC
Sent: Wednesday, February 21, 2024 5:04 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0010887003
Attachments: JAMESMRIDGWAY 5754 FM 6 Josephine-response2-20-2024.docx

H
PML

Jesús Bárcena
Office of the Chief Clerk
Texas Commission on Environmental Quality
Office Phone: 512-239-3319

How is our customer service? Fill out our online customer satisfaction survey at:
www.tceq.texas.gov/customersurvey

From: jridgway1965@yahoo.com <jridgway1965@yahoo.com>
Sent: Tuesday, February 20, 2024 5:44 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0010887003

REGULATED ENTY NAME CITY OF JOSEPHINE WWTP NO 3

RN NUMBER: RN111735411

PERMIT NUMBER: WQ0010887003

DOCKET NUMBER:

COUNTY: COLLIN

PRINCIPAL NAME: CITY OF JOSEPHINE

CN NUMBER: CN600670178

NAME: James M Ridgway

EMAIL: jridgway1965@yahoo.com

COMPANY:

ADDRESS: 5754 FM 6
JOSEPHINE TX 75189-4000

PHONE: 9729511353

FAX:

COMMENTS: See attached document.

James Ridgway 5754 FM 6 Josephine, TX 75889, Mailing address P O Box 127 Caddo Parish, LA 75135 – I live in the HUNT COUNTY side of Josephine.

Why I believe my property is affected.

Potential Flooding -

More houses PLUS more usage equals more water in the creek daily and potential monofil run-off gives an increased risk of adding my property to a zone A on FEMA flood map. All property owners along or near this creek are at risk of flooding. In 2015, flooding was experienced as far as Clay Drive.

There has not been a new flood map for the City of Josephine since 2009 in Colling County and 2012 in Hunt County. Only LOMR studies by developers have been given to FEMA to receive a blessing before building, which is biased, in my opinion since the developers develop the flood maps.

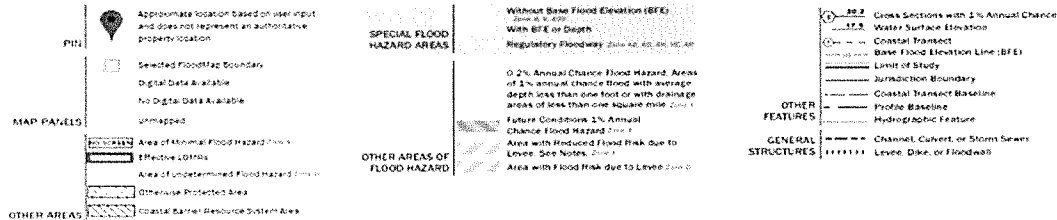
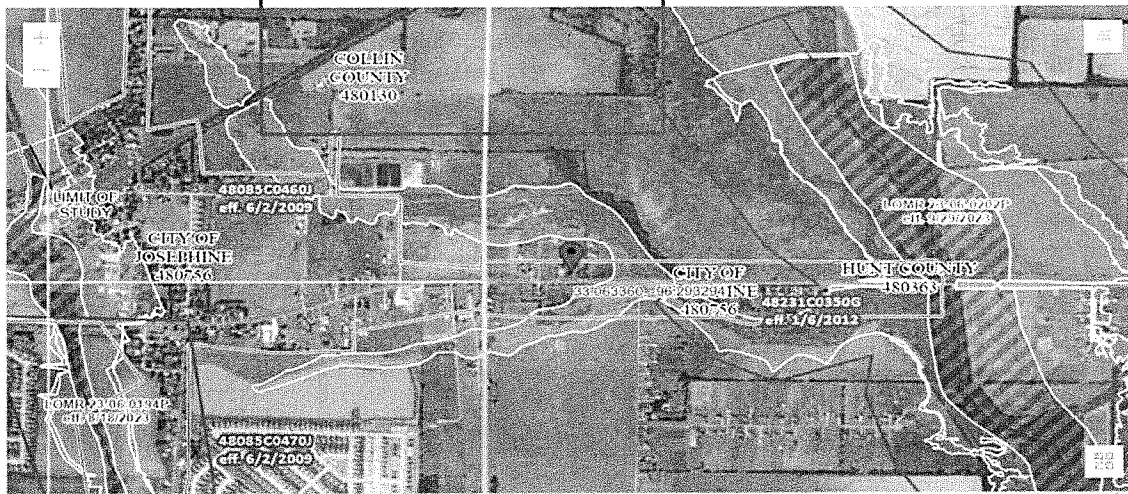
Here is a photo of the property Horton is developing and the 3 ft culvert running underneath is running down into the creek. I do not see a FEMA map on the new part of the Riverfield property that is being developed.



Trash and flood fences fail in the light rain that has been experienced. What happens if the same conditions exist with future building north of the city? Some of our city streets look like this. Trash in ditches.



<https://msc.fema.gov/portal/search> See the new LOMR from Horton – lines in blue. There is no LOMR for the area I have outlined in Red. Horton is building here now and have a big 4 ft (at lease) pipe channelled into the creek behind. The Red bubble is my house. May or may not be important, until the creek backs up because of trash buildup, beavers, etc.)



I know of no flood mitigation plan for this city.

Please review document at this link – even the EPA recommends there needs to be flood mitigation for water and wastewater facilities.
https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf

Air Pollution – Before the Magnolia/City of Josephine Wastewater 2 Plant, the waste stabilization pond/anaerobic pond/existing lagoon treatment plant facility used by the City of Josephine on Caddo Street did not emit any odor we could detect at our property. The Fountain View subdivision located in the City of Josephine was diverted to the SBR Plant constructed by DR HORTON, Magnolia MUD, and then given to the City contractually as City of Josephine Wastewater Plant 2. Currently that SBR plant which resides in the Magnolia MUD housing area releases odor that I smell at my property less than a mile away. If this new SBR plant releases the same odor, at least more than 800 homes or more in the area will not be smelling fresh country air.

Granted, TCEQ does not monitor air quality but the McKinney MUNI AP (TX) Wind Rose was included in the documentation, therefore one has to conclude wind (and an assumed air quality) IS AN issue.

Eco-environment The wooded Brushy Creek area behind my home houses hawks, birds, fowl, beaver, skunks, frogs, turtles, and more. Though chemicals treating sewer are not supposed to be harmful to fish, fowl, animals, an increase in the amount of flow may negate that thought.

Transparency.

Hearing Request

I request a contested case hearing because homeowners are at risk and a lot of folks do not know about the new plant. I know citizens need to find out for themselves, but the city website is not good to find anything.

TCEQ-20960 form page 1 of 4

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<https://www.bestplaces.net/city/texas/josephine>

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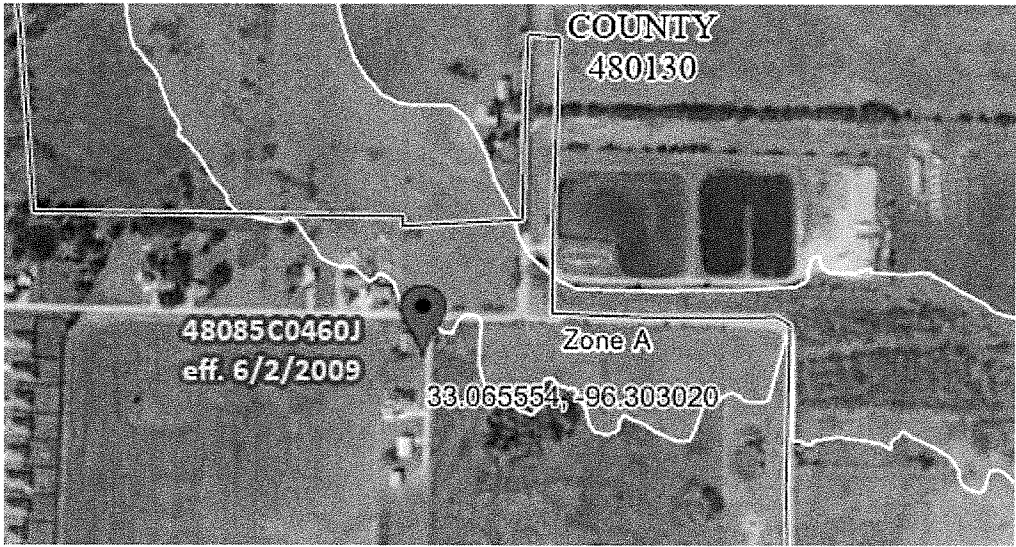
FCEQ Form -10054 form page 8 of 80 Question 4 and 5 and 6 not answered.
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There are a lot of check boxes that are not marked.

Additionally, I request to be placed on the permanent mailing list for the City of Josephine permit number WQ0010887003 or new permit number.

Thank you for your consideration.

James Ridgway



FEMA Flood Zone Designations				
Undetermined Risk	Low Risk	Moderate Risk	High Risk	Coastal High Risk
Increasing Risk				
Zone D	Zones C and X (unshaded)	Zones B and X (shaded)	Zones A, AE, A1-30, AH, AO, A99	Zones V, VE, V1-30
	Non-Special Flood Hazard Area (NSFHA)		Special Flood Hazard Area (SFHA)	

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https://www14.tceq.texas.gov/epic/eCID/index.cfm?fuseaction=main.detail&item_id=587547912023157&detail=action&StartRow=1&EndRow=1&Step=25&requesttimeout=5000

it shows comment period ended 1/4/2024

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TCEQ Commissioners' Integrated Database - All Activity Actions

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Activity Action List:

Date	Document Type	Action
01/04/2024	COMMENT PERIOD	END
12/19/2023	AFFIDAVIT - NAPD	RECEIVED
12/19/2023	NEWSPAPER TEARSHEET	RECEIVED
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12/19/2023	PUBLIC NOTICE VERIFICATION FORM	RECEIVED
12/05/2023	NOTICE - PRELIM DECISION	PUBLISHED
11/21/2023	NOTICE - PRELIM DECISION	MAILED
11/16/2023	FILE	RECEIVED
06/20/2023	NOTICE OF RECEIPT/INTENT	COMPLETE
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06/20/2023	AFFIDAVIT - NORI	RECEIVED
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05/01/2023	APPLICATION	RECEIVED

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Vincent Redondo

IP 279348

From: PUBCOMMENT-OCC
Sent: Wednesday, February 21, 2024 5:04 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0010887003
Attachments: JAMESMRIDGWAY 5754 FM 6 Josephine-response2-20-2024.docx

H
PML

Jesús Bárcena
Office of the Chief Clerk
Texas Commission on Environmental Quality
Office Phone: 512-239-3319

How is our customer service? Fill out our online customer satisfaction survey at:
www.tceq.texas.gov/customersurvey

From: jridgway1965@yahoo.com <jridgway1965@yahoo.com>
Sent: Tuesday, February 20, 2024 5:44 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0010887003

REGULATED ENTY NAME CITY OF JOSEPHINE WWTP NO 3

RN NUMBER: RN111735411

PERMIT NUMBER: WQ0010887003

DOCKET NUMBER:

COUNTY: COLLIN

PRINCIPAL NAME: CITY OF JOSEPHINE

CN NUMBER: CN600670178

NAME: James M Ridgway

EMAIL: jridgway1965@yahoo.com

COMPANY:

ADDRESS: 5754 FM 6
JOSEPHINE TX 75189-4000

PHONE: 9729511353

FAX:

COMMENTS: See attached document.

James Ridgway 5754 FM 6 Josephine, TX 75189, Mailing address P O Box 127 Caddo Mills, TX 75135 – I live in the HUNT COUNTY side of Josephine.

Why I believe my property is affected.

Potential Flooding -

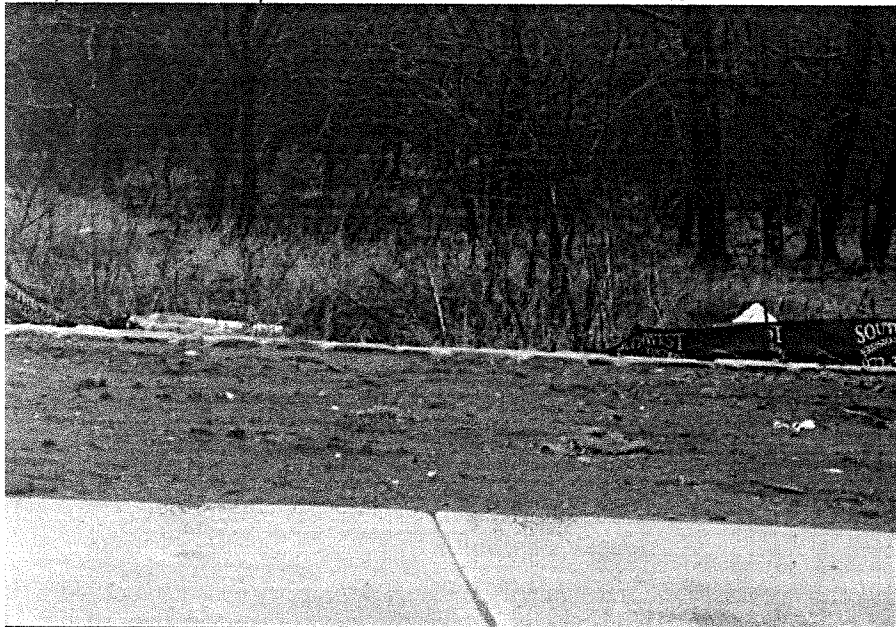
More houses PLUS more usage equals more water in the creek daily and potential runoff gives an increased risk of adding my property to a zone A on FEMA flood map. All property owners along or near this creek are at risk of flooding. In 2015, flooding was experienced as far as Clay Drive.

There has not been a new flood map for the City of Josephine since 2009 in Colling County and 2012 in Hunt County. Only LOMR studies by developers have been given to FEMA to receive a blessing before building, which is biased, in my opinion since the developers develop the flood maps.

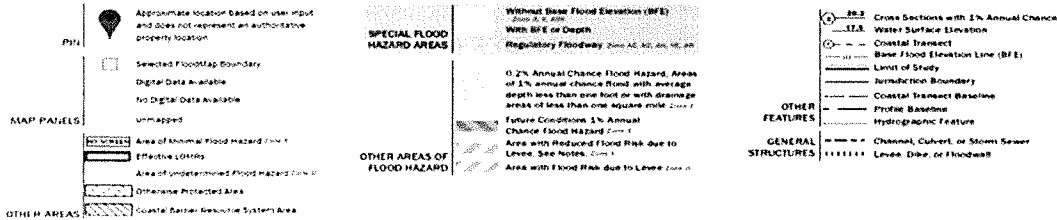
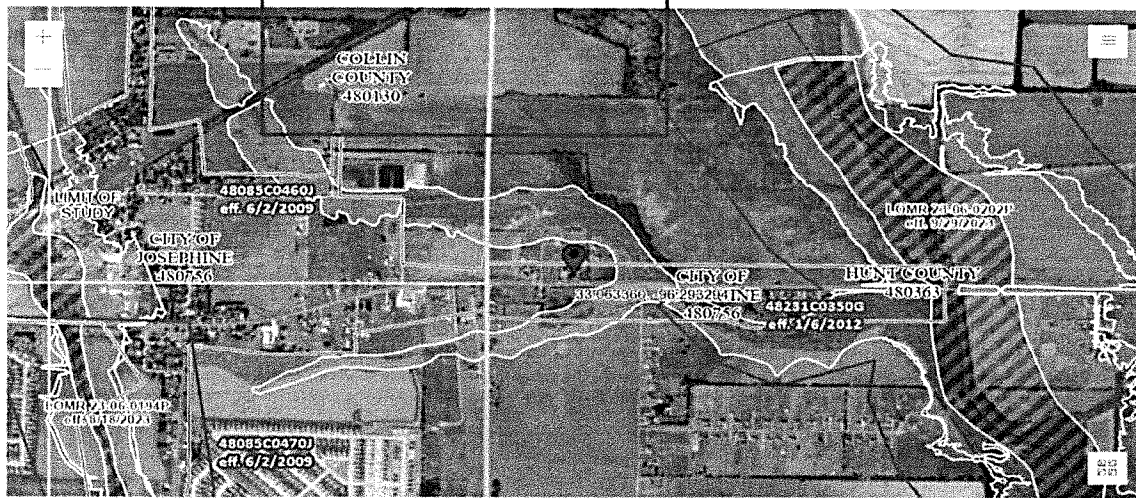
Here is a photo of the property Horton is developing and the 3 ft culvert running underneath is running down into the creek. I do not see a FEMA map on the new part of the Riverfield property that is being developed.



Trash and flood fences fail in the light rain that has been experienced. What happens if the same conditions exist with future building north of the city? Some of our city streets look like this. Trash in ditches.



<https://msc.fema.gov/portal/search> See the new LOMR from Horton – lines in blue. There is no LOMR for the area I have outlined in Red. Horton is building here now and have a big 4 ft (at lease) pipe channelled into the creek behind. The Red bubble is my house. May or may not be important, until the creek backs up because of trash buildup, beavers, etc.



I know of no flood mitigation plan for this city.

Please review document at this link – even the EPA recommends there needs to be flood mitigation for water and wastewater facilities.
https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf

Air Pollution – Before the Magnolia/City of Josephine Wastewater 2 Plant, the waste stabilization pond/anaerobic pond/existing lagoon treatment plant facility used by the City of Josephine on Caddo Street did not emit any odor we could detect at our property. The Fountain View subdivision located in the City of Josephine was diverted to the SBR Plant constructed by DR HORTON, Magnolia MUD, and then given to the City contractually as City of Josephine Wastewater Plant 2. Currently that SBR plant which resides in the Magnolia MUD housing area releases odor that I smell at my property less than a mile away. If this new SBR plant releases the same odor, at least more than 800 homes or more in the area will not be smelling fresh country air.

Granted, TCEQ does not monitor air quality but the McKinney MUNI AP (TX) Wind Rose was included in the documentation, therefore one has to conclude wind (and an assumed air quality) IS AN issue.

Eco-environment The wooded Brushy Creek area behind my home houses hawks, birds, fowl, beaver, skunks, frogs, turtles, and more. Though chemicals treating sewer are not supposed to be harmful to fish, fowl, animals, an increase in the amount of flow may negate that thought.

Transparency.

Hearing Request

I request a contested case hearing because homeowners are at risk and a lot of folks do not know about the new plant. I know citizens need to find out for themselves, but the city website is not good to find anything.

TCEQ-20960 form page 1 of 4

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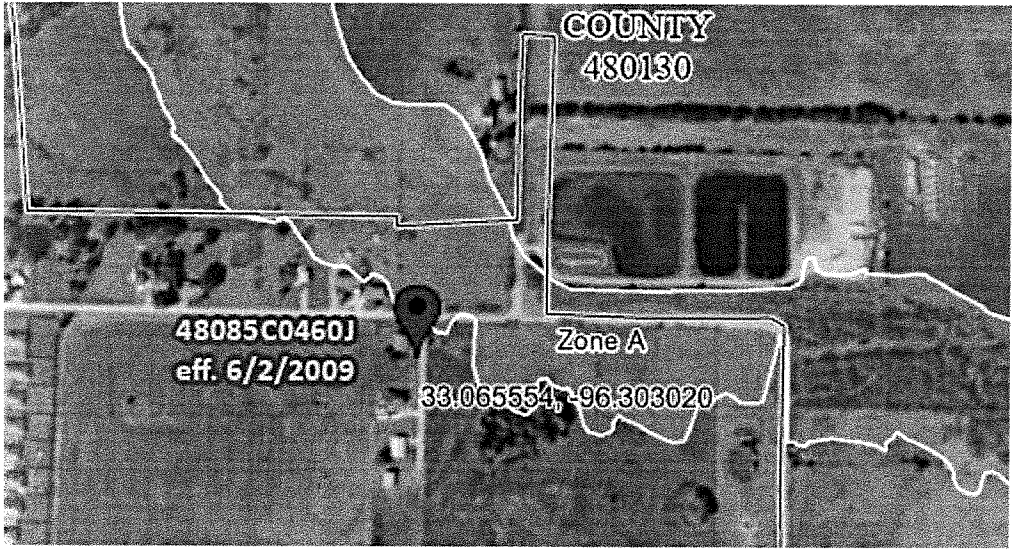
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01/10/2024	NOTICE - PRELIM DECISION	PUBLISHED
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Jane Ridgway
5754 FM 6
Josephine, Tx 75189
Hunt County

7-3-2024

Reviewed By 7500

JUL 09 2024 RFR/H

Aurie Gharis, Chief Clerk
TCEQ, MC 105
P O BOX 13087
Austin, TX 78711-3087

REQUEST FOR RECONSIDERATION AND A CONTESTED CASE HEARING ON
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
TPDES PERMIT NUMBER WQ0010887003

Name of Person Contesting: Jane Ridgway
Mailing Address: P O Box 127, Caddo Mills, TX 75135-0127
Daytime Phone: 972-834-8686
Fax Number: None
Physical Property Location and Homestead: 5754 FM 6, Josephine, TX 75189 - Hunt County

Email: jridgway1971@gmail.com (no "e" in ridgway)
Applicant: City of Josephine - TPDES PERMIT NUMBER WQ0010887003

CHIEF CLERKS OFFICE
2024 JUL -8 PM 2:35
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

I am again requesting a contested case hearing and also reconsideration of June 17 letter Decision of the Executive Director. I live within one mile of the proposed facility. Wastewater runoff is already dispatched to the creek directly behind my neighbor's house which backs up to the creek. He lives directly behind my 2 acres. Water from creek seeps into surrounding ground. Last night on FM 6 odor was bad, and could have been either the current lagoon WQ0010887001 or SBR WQ0010887002 at Magnolia MUD. Both dump water to Brushy Creek meandering down to Lake Tawakoni.

ACT- 2015 there were no subdivisions on FM6 in Hunt County. In 2024, there are 2 subdivisions on FM6 and two subdivisions on East St. in old Josephine which dump wastewater into the creek, and when it rains the runoff floods in the properties to the east, mine included. If the flow increases .75MGD for a total of .82MGD, I can only see more water coming on my property and it becoming a FEMA zone A. More water on my property makes it. Historical Google Earth Maps and wastewater plan link in next paragraph support this.

ACT- see- https://www.cityofjosephinetx.com/pdf/Josephine_Wastewater%20Master%20Plan_Final_Signed.pdf **City Of Josephine Wastewater Master Plan Section 6.4 Lagoon Wastewater Treatment Plant - An additional .75 MGD.**

The City of Josephine currently owns and operates a lagoon wastewater treatment plant. The treatment train includes an aeration oxidation ditch and two mixed lagoons. The current permit allows for a daily average flow of 0.07 MGD. The WWTP is located in the northeast area of the city and existing flows from the west region of the city are lifted to the lagoon wastewater treatment plant. A project to expand the current wastewater treatment plant and add an **additional** 0.75 MGD treatment capacity is currently under design by DBI. DBI is also pursuing a new wastewater permit with the TCEQ. This master plan report assumes the 0.75 MGD addition will be incorporated onsite. This means my property will be taking on more water through the ground. This is more water than citizens were told will be going into the creek and my mitigation will become worse, or property may become Zone A if not already, due to subdivision development, more houses equals more sewage.

ACT- Application was submitted without a current flood map for the building site. FEMA requires review every 5 years and this has not been one. City now requires LOMR maps, since 2023.

ACT - FEMA FLOOD MAPS ARE OUTDATED - <https://firststreet.org/research-library/understanding-fema-flood-maps-and-limitations> - TCEQ attempting to approve a permit with outdated and potentially incorrect information.

ACT- City has allowed the developer to build Magnolia Point MUD with FEMA MAP 48085C0460J Eff 6/2/2009 maps, & after a flooding of homes on FM 1777(822 East St, Josephine, TX, 75164, USA) during Waverly Development, LOMR maps LOMR 23-06-0194P eff 8/18/2023 and LOMR 23-06-1047P eff 5/6/2024 were required. <https://hazards-prisma.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-6.31407548995618,33.04846476625197,-96.27253343673354,33.066448955590076>

ACT - City contracted for a Prelim Flood Study for the Public Safety Building - Kimley Horn IPO 20 - \$10,000. Then IPO 21 was approved using other developer maps for \$94k to file the flood map. https://www.cityofjosephinetx.com/pdf/Agendas_Minutes/Minutes---City-Council-meeting-July-10-2023---AMENDED.pdf "Doug Ewing made a motion to approve Individual Project Order (IPO) #21 between the City of Josephine and Kimley-Horn and Associates for a Conditional Letter of Map Revision, Fully Developed Floodplain Study, and Letter of Map Revision for the proposed site of the new Public Safety Building Project located on the northwest corner of FM 6 and Main Street in a projected amount of \$94,700 to be paid from funds previously set aside for the project. Seconded by Joyce Miller. All in favor, the motion carried." Additional action-See 8/14/2023 City Council Agenda https://www.cityofjosephinetx.com/pdf/Agendas_Minutes/Minutes---City-Council-meeting-August-14-2023.pdf, under Consent Agenda - Kimley-Horn Engineering Status Report- PROJECTS- 064611431 - PUBLIC SAFETY BUILDING FLOOD STUDY - Performing updates to existing and conceptual proposed condition model based on on-ground survey. Kick off ESA. waiting proposed grading of project site.

The city should adhere to their rules for all construction. - CITY OF JOSEPHINE SUBDIVISION ORDINANCE <https://www.cityofjosephinetx.com/pdf/City-of-Josephine-Subdivision-Regulations-Approved-6-6-15.pdf> "Section 3.10: Storm Water Collection and Conveyance Systems, **Item C- No person, individual, partnership, firm or corporation shall deepen, widen, fill, reclaim, reroute or change the course or location of any existing ditch, channel, stream or drainage way without first obtaining written permission of the City Engineer and any other applicable agency (such as FEMA or the U.S. Army Corps of Engineers) having jurisdiction.** The City Engineer may, at his or her discretion, require preparation and submission of a flood study for a proposed development if there are concerns regarding storm

drainage on the subject property or upstream or downstream from the subject property. The costs of such study, if required, shall be borne by the developer." My observation is that this would mean the city is also subject to the rules they put in place and approved. Creek is already made wider with current outflow.

FACT - There has been no flood study for the site for the sewer plant. The city and TCEQ are/will be making decisions based on 15 year old data.

FACT - There is no Flood Mitigation plan for the city. On 9-12-2022 there was an item to "Discuss, consider, and act on Resolution No. 2022-09-12 adopting the 2022 Collin County Hazard Mitigation Plan." I could not locate a solid plan to prevent or lessen critical infrastructure from flooding in the Collin County Hazard Mitigation Plan. This link to the City of Josephine Agenda 9-12-2022 contains the Collin County Hazard Mitigation Plan. <https://www.cityofjosephinetx.com/pdf/September%2012%2C%202022%20Agenda%20Packet.pdf>

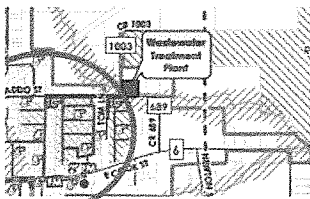
The chart on Page 113 of the plan show under Josephine Texas show Josephine having a higher rate of flooding, which flows down into HUNT CO, where residents in the discharge path are. Josephine shows 60.53% of Commercial and Utility Parcels in 100 year Floodplain and 10.13% (now more) for Residential Parcels. Sewer Plant would be infrastructure.

FACT - City Council Minutes 7-8-2019 - Closed city and county roads due to high water. This was not in the 2022 Hazard Mitigation Plan. As a former CISO Bus Monitor, I have observed Caddo Street flooded. 620 Caddo St. is address of the sewer plant.

My request for a contested hearing is because my home is coded Zone X on FEMA MAP. It did not flood in 2015 when the rest of the city had flooding or in 2019. This year my property began to take on more water than in past years. **See photos**



Developments
causing more
water-this will be
issue for sewer
plant as well



4 subdivisions have been almost completed (this is part of the Wastewater Map page 57- from City of Josephine Comprehensive Plan)

houses are built now (not shown on 2009 flood maps, and it has to be that the development that has happened since 2015. With just the .07 MGD lagoon (and adding wastewater to current system I believe that and with an additional 750 MGD coming into the creek as additional wastewater.

The current wastewater lagoon system is .07 MGD. There has not been a current flood map **since 2009** in Josephine, **Collin County**. On the **Hunt County** side of Josephine, the last flood study was **2012** by my former neighbor behind my property who got flooded. The area across the creek directly in back of my neighbors home which is directly in back of my home, is under development by DR HORTON has not had a flood study since 2009. When it rains, water dumps water into the creek from the "infrastructure in process" for Riverfield Development. If Flood Administrator/Public Utility Director has followed advise in https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf the application for permit should show those details.

Challenge to Responses in Executive Directors Response to Public Comment.

RESPONSE 1 - Certain People - Not understanding Mr. Hensley issue.

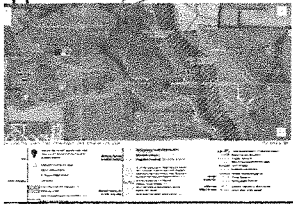
Challenge to RESPONSE 2 - I requested a contested hearing - I still request it with reconsideration of the decision. More water pouring on property in rain affects my safety (I'm 71). Soil washes and causing my husband and I mitigate manually. (limited funds) This is not light work. Taking on more water will alter this Zone X property to Zone A.

RESPONSE 3 - Not my issue

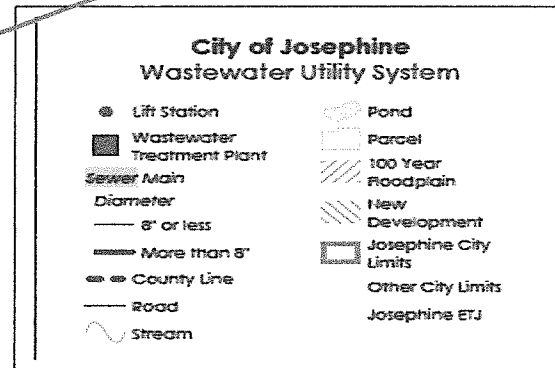
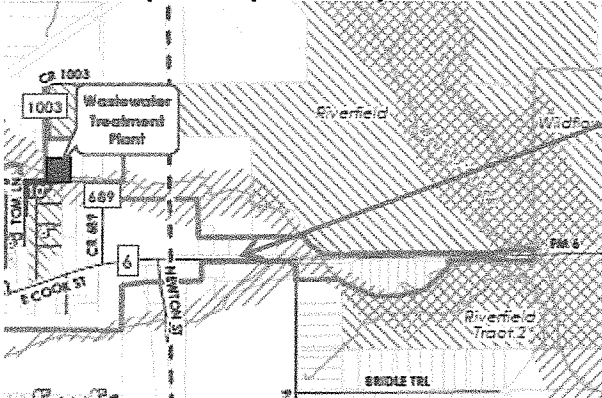
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Challenge to RESPONSE 5 - Flooding - Though TCEQ contends they do not have jurisdiction to address flooding, TCEQ alludes to an "Other requirement No 5." that the city provide protection for the wastewater treatment facilities from the 100 year flood. There is no indication of how the city is going to protect the wastewater treatment from a 100 year flood in the application that we can see. **There is no current flood study** so to complete this requirement may be impossible for the city as they cannot gauge protection. If TCEQ provides an approval, **they will be providing approval without full knowledge**. City should conduct a FEMA flood study of land north of the sewer plant that is being developed currently because it will affect the sewer plant as other development in the city has affected my property. City should also conduct a flood study at a minimum in the area that is in the one mile area adjacent to the discharge route-see Landowner Map in permit app. TCEQ does work with FEMA re: https://www.tceq.texas.gov/assets/public/comm_exec/agendas/worksess/backup/2017-12-14/harvey.pdf. To preclude flooding TCEQ could lobby to work with FEMA to ensure flood maps are updated. Per conversation with a staff member of TCEQ Resource Protection Team, TexasFlood.org is a project of Department of Emergency Management, Texas Water Development Board (TWDB) and General Land Office. This indicates that an overall culture should be looked at before committing to a design without a flood plan and millions of dollars to implement design without protection. One of the TWDB responsibilities is "assist with regional water supply and flood planning that contributes to expanding the state water plan and state flood

FEMA MAP 48085C0460J- THIS MAP IS 6/2/2014. The orange square is under development by DR HORTON and can significantly alter the site for the proposed sewer plant. It has NOT BEEN INCLUDED IN THE LOMR STUDIES BY DR HORTON. I know my land has been altered by the development, so I believe this property will be affected as well. My photographs show flooding where there has not been flooding. The application may say the proposed site is above the 100 year flood plain, however this entry must be based on 2009 data. The city had DR Horton make LOMRs for Riverfield, but evidently they missed this part of the development. I have driven on streets that have been made in the orange area, and the water dumps down a gravel chute. As the NEW SUBDIVISION streets progress to the CR 1003 water may be directed into the floodway, which could back up onto the sewer area. I did not see a flood mitigation anywhere in city documentation or application for the sewer.



Additionally there is already wastewater in the creek from the current lagoon system. My house is from the City of Josephine Comprehensive Plan



Please review document at this link – even the EPA recommends there needs to be flood mitigation for water and wastewater facilities. https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf

3. Have you obtained FEMA Flood Maps? Yes No

If no, go to the [Map Service Center](#) to find FEMA Flood Maps, categorized by community. Flood Maps show areas that will be affected by both 100-year and 500-year floods. A "100-year flood" is a flood event that has a one percent chance of occurring in a given year. A "500-year flood" is a flood event that has a two tenths percent chance of occurring in a given year. Click on the icon to learn more about interpreting a Flood Map. If your Flood Map is not up to date, talk with your local community planning department or floodplain manager.



I have said many times the city needs new maps but it falls on deaf ears. LOMR's finally started, but not for all property – like the sewer

Page 285 Collin County Hazard Mitigation Action Plan

When a community chooses to join the NFIP, it must require permits for all development in the SFP to ensure that construction materials and methods used will minimize future flood damage. Permit files must contain documentation to substantiate how buildings were actually constructed. In return, the Federal Government makes flood insurance available for almost every building and its contents within the community.

Communities must ensure that their adopted floodplain management ordinance and enforcement procedures meet program requirements. Local regulations must be updated when additional data are provided by FEMA or when Federal or State standards are revised.

A more in-depth description of each jurisdiction's NFIP program is addressed in the jurisdictional annexes.

The sewer should have at least one structure for testing wastewater, if designed like current SBR. Drawings in permit are small. How will it be constructed?

Air Pollution –TCEQ needs to monitor the entire area Before the Magnolia/City of Josephine Wastewater 2 Plant, the waste stabilization pond/anaerobic pond/existing lagoon treatment plant facility used by the City of Josephine on Caddo Street did not emit any odor we could detect at our property. The Fountain view subdivision located in the City of Josephine was diverted to the SBR Plant constructed by DR HORTON, Magnolia MUD, and then given to the City contractually as City of Josephine Wastewater Plant 2. Currently that SBR plant which resides in the Magnolia MUD housing area releases odor that I smell at my property less than a mile away. If this new SBR plant releases the same odor, 1000+ homes or more in the area will not be smelling fresh country air. **See my challenge to RESPONSE 6** Granted, the Directors response says TCEQ does not monitor air quality but the McKinney MUNI AP (TX) Wind Rose was included in the documentation, therefore one has to conclude wind (and an assumed air quality) IS AN issue. <https://www.tceq.texas.gov/airquality/monops/>

eco-environment The wooded Brushy Creek area behind my home houses hawks, birds, fowl, beaver, skunks, frogs, turtles, and more. Although chemicals treating sewer are not supposed to be harmful to fish, fowl, animals, an increase in the amount of flow may negate that thought. See **Challenge to Comment 13**.

Additionally, I request to be placed on the permanent mailing list for the City of Josephine permit number WQ0010887003 or new permit number.

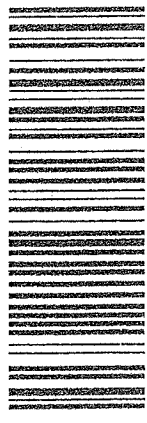
Jane Ridgway
5754 Fm 6
Josephine, TX 75189-4009

ON ENVIRONMENTAL
QUALITY

2024 JUL -8 PM 2:26

CHIEF CLERKS OFFICE

REGISTERED MAIL



7022 1670 0003 440J 0230

Retail



RDC 99

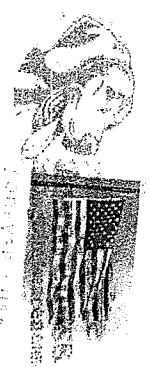


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U.S. POSTAGE PAID
FCM LETTER
GREENVILLE, TX 75402
JUL 05, 2024



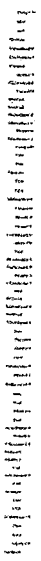
RECEIVED

JUL 05 2024

TECO MAIL CENTER
PM

Laurie Ghans Chief Clerk
TC EQ MC 105
PO Box 13087
Austin TX 78711-3087

78711-3087



Jennifer Cox

From: PUBCOMMENT-OCC
Sent: Monday, July 8, 2024 9:29 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0010887003
Attachments: 2024-07-03Jane Ridgway 5754 FM 6 Josephine-final-pdf.pdf

eComment = RFR, H
Attachment = RFR, H

From: jridgway1971@gmail.com <jridgway1971@gmail.com>
Sent: Thursday, July 4, 2024 5:26 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0010887003

REGULATED ENTY NAME CITY OF JOSEPHINE WWTP NO 3

RN NUMBER: RN111735411

PERMIT NUMBER: WQ0010887003

DOCKET NUMBER:

COUNTY: COLLIN

PRINCIPAL NAME: CITY OF JOSEPHINE

CN NUMBER: CN600670178

NAME: Jane Ridgway

EMAIL: jridgway1971@gmail.com

COMPANY:

ADDRESS: 5754 FM 6
JOSEPHINE TX 75189-4000

PHONE: 9728348686

FAX:

COMMENTS: I REQUEST FOR RECONSIDERATION of June 17 letter Decision of the Executive Director AND a CONTESTED CASE HEARING ON TEXAS COMMISSION ON ENVIRONMENTAL QUALITY TPDES PERMIT NUMBER WQ0010887003. I again submit contested case hearing request. Concerns are flooding, air quality and eco environment. In attached document I tried to show facts with supporting

links to internet info and city info. I live within a mile of the proposed facility. Wastewater runoff is already dispatched to the creek directly behind my neighbor's house and property floods when it rains. His house backs up to the creek, directly behind my 2 acres. Water from creek seeps into surrounding ground to my place. Flooding water also affects wildlife in the creek and on my property and me when I need to walk out to see if water is going to come into my house. Last night on FM 6 odor was bad, which could have been either the current lagoon WQ0010887001 or SBR WQ0010887002 at Magnolia MUD. I expect new plant will probably produce the same odors. Similar to the Trinity River in Dallas as night. Per conversation with a staff member of TCEQ Resource Protection Team, TexasFlood.org is a project of Department of Emergency Management, Texas Water Development Board and General Land Office. Additionally TCEQ has worked with FEMA during floods. With Flooding a major theme in these state government agencies, I think collaboration with all agencies and local sewer departments/flood administrators is key so current FEMA Maps/LOMRs are used data before approving any permits, whether it be Sewer, WaterTower, SUD or MUD. Thank you.

Jane Ridgway
5754 FM 6
Josephine, Tx 75189
Hunt County

7-3-2024

Laurie Gharis, Chief Clerk
TCEQ, MC 105
P O BOX 13087
Austin, TX 78711-3087

REQUEST FOR RECONSIDERATION AND A CONTESTED CASE HEARING ON
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
TPDES PERMIT NUMBER WQ0010887003

Name of Person Contesting: Jane Ridgway
Mailing Address: P O Box 127, Caddo Mills, TX 75135-0127
Daytime Phone: 972-834-8686
Fax Number: None
My Physical Property Location and Homestead 5754 FM 6, Josephine, TX 75189 - Hunt County

Email: iridgway1971@gmail.com (no "e" in ridgway)
Applicant: City of Josephine - TPDES PERMIT NUMBER WQ0010887003

I also am again requesting a contested case hearing and also reconsideration of June 17 letter Decision of the Executive Director. I live within a mile of the proposed facility. Wastewater runoff is already dispatched to the creek directly behind my neighbor's house which backs up to the creek. He lives directly behind my 2 acres. Water from creek seeps into surrounding ground. Last night on FM 6 odor was bad, and could have been either the current lagoon WQ0010887001 or SBR WQ0010887002 at Magnolia MUD. Both dump water to Brushy Creek meandering down to Lake Tawakoni.

FACT- 2015 there were no subdivisions on FM6 in Hunt County. In 2024, there are 2 subdivisions on FM6 and two subdivisions on East St. in "old Josephine" which dump wastewater into the creek, and when it rains the runoff floods in the properties to the east, mine included. If the flow increases .75MGD for a total of .82MGD, I can only see more water coming on my property and it becoming a FEMA zone A. More water on my property makes it. Historical Google Earth Maps and wastewater plan link in next paragraph support this.

FACT- see- https://www.cityofjosephinetx.com/pdf/Josephine_Wastewater%20Master%20Plan_Final_Signed.pdf **City Of Josephine Wastewater Master Plan Section 6.4 Lagoon Wastewater Treatment Plant – An additional .75 MGD.**

"The City of Josephine currently owns and operates a lagoon wastewater treatment plant. The treatment train includes an aeration oxidation ditch and two mixed lagoons. The current permit allows for a daily average flow of 0.07 MGD. The WWTP is located in the northeast area of the city and existing flows from the west region of the city are lifted to the lagoon wastewater treatment plant. A project to expand the current wastewater treatment plant and add an **additional** 0.75 MGD treatment capacity is currently under design by DBI. DBI is also pursuing a new wastewater permit with the TCEQ. This master plan report assumes the 0.75 MGD addition will be incorporated onsite." This means my property will be taking on more water through the ground. This is more water than citizens were told will be going into the creek and my mitigation will become worse, or property may become Zone A if not already, due to subdivision development, more houses equals more sewage.

FACT- Application was submitted without a current flood map for the building site. FEMA requires review every 5 years and this has not been done. City now requires LOMR maps, since 2023.

FACT - FEMA FLOOD MAPS ARE OUTDATED - <https://firststreet.org/research-library/understanding-fema-flood-maps-and-limitations> - TCEQ is attempting to approve a permit with outdated and potentially incorrect information.

FACT- City has allowed the developer to build Magnolia Point MUD with FEMA MAP 48085C0460J Eff 6/2/2009 maps, & after a flooding of homes on FM 1777 (822 East St, Josephine, TX, 75164, USA) during Waverly Development, LOMR maps LOMR 23-06-0194P eff 8/18/2023 and LOMR 23-06-1047P eff 5/6/2024 were required. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-96.31407548995618,33.04846476625197,-96.27253343673354,33.066448955590076>

FACT - City contracted for a Prelim Flood Study for the Public Safety Building – Kimley Horn IPO 20 - \$10,000. Then IPO 21 was approved using other developer maps for \$94k to file the flood map. https://www.cityofjosephinetx.com/pdf/Agendas_Minutes/Minutes---City-Council-Meeting-July-10-2023---AMENDED.pdf "Doug Ewing made a motion to approve Individual Project Order (IPO) #21 between the City of Josephine and Kimley-Horn and Associates for a Conditional Letter of Map Revision, Fully Developed Floodplain Study, and Letter of Map revision for the proposed site of the new Public Safety Building Project located on the northwest corner of FM 6 and Main Street in a projected amount of \$94,700 to be paid from funds previously set aside for the project. Seconded by Joyce Miller. All in favor, the motion carried." Additional action-See 8/14/2023 City Council Agenda https://www.cityofjosephinetx.com/pdf/Agendas_Minutes/Minutes---City-Council-Meeting-August-14-2023.pdf, under Consent Agenda - Kimley-Horn Engineering Status Report- PROJECTS- 064611431 - PUBLIC SAFETY BUILDING FLOOD STUDY - Performing updates to existing and conceptual proposed condition model based on on-ground survey. Kick off ESA. Awaiting proposed grading of project site.

The city should adhere to their rules for all construction. - CITY OF JOSEPHINE SUBDIVISION ORDINANCE
<https://www.cityofjosephinetx.com/pdf/City-of-Josephine-Subdivision-Regulations-Approved-6-6-15.pdf> -" Section 3.10: Storm Water Collection and Conveyance Systems, **Item C- No person, individual, partnership, firm or corporation shall deepen, widen, fill, reclaim, reroute or change the course or location of any existing ditch, channel, stream or drainage way without first obtaining written permission of the City Engineer and any other applicable agency (such as FEMA or the U.S. Army Corps of Engineers) having jurisdiction.** The City Engineer may, at his or her discretion, require preparation and submission of a flood study for a proposed development if there are concerns regarding storm

drainage on the subject property or upstream or downstream from the subject property. The costs of such study, if required, shall be borne by the developer." My observation is that this would mean the city is also subject to the rules they put in place and approved. Creek is already made wider with current outflow.

FACT - There has been no flood study for the site for the sewer plant. The city and TCEQ are/will be making decisions based on 15 year old data.

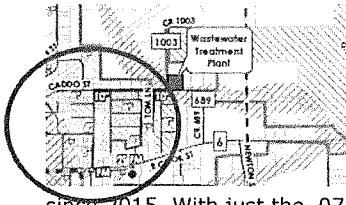
FACT- There is no Flood Mitigation plan for the city. On 9-12-2022 there was an item to "Discuss, consider, and act on Resolution No. 2022-09-12 adopting the 2022 Collin County Hazard Mitigation Plan." I could not locate a solid plan to prevent or lessen critical infrastructure from flooding in the Collin County Hazard Mitigation Plan-This link to the City of Josephine Agenda 9-12-2022 contains the Collin County Hazard Mitigation Plan. <https://www.cityofjosephinetx.com/pdf/September%2012%2C%202022%20Agenda%20Packet.pdf> The chart on Page 113 of the plan show under Josephine Texas show Josephine having a higher rate of flooding, which flows down into HUNT CO, where residents in the discharge path are. Josephine shows 60.53% of Commercial and Utility Parcels in 100 year Floodplain and 10.13%(now more) for Residential Parcels. Sewer Plant would be infrastructure.

FACT - City Council Minutes 7-8-2019 -Closed city and county roads due to high water. This was not in the 2022 Hazard Mitigation Plan. As a former Cisd Bus Monitor, I have observed Caddo Street flooded. 620 Caddo St. is address of the sewer plant.

My request for a contested hearing is because my home is coded Zone X on FEMA MAP . It did not flood in 2015 when the rest of the city had flooding or in 2019. This year my property began to take on more water than in past years. **See photos**



Developments causing more water-this will be issue for sewer plant as well



4 subdivisions have been almost completed (this is part of the Wastewater Map page 57- from City of Josephine Comprehensive Plan)

houses are built now (not shown on 2009 flood maps, and it has to be that the development that has happened since 2015. With just the .07 MGD lagoon (and adding wastewater to current system I believe that and with an additional 750 MGD coming into the creek as additional wastewater.

The current wastewater lagoon system is .07MGD. There has not been a current flood map **since 2009** in Josephine, **Collin County**. On the **Hunt County** side of Josephine, the last flood study was **2012** by my former neighbor behind my property who got flooded. The area across the creek directly in back of my neighbors home which is directly in back of my home, is under development by DR HORTON has not had a flood study since 2009. When it rains, water dumps water into the creek from the "infrastructure in process" for Riverfield Development. If Flood Administrator/Public Utility Director has followed advise in https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf the application for permit should show those details.

Challenge to Responses in Executive Directors Response to Public Comment.

RESPONSE 1 – Certain People - Not understanding Mr.Hensley issue.

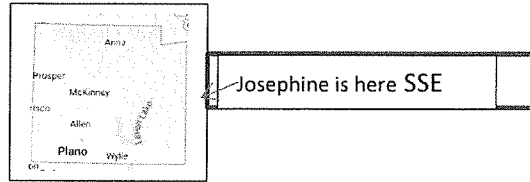
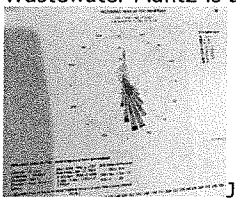
Challenge to RESPONSE 2 -I requested a contested hearing – I still request it with reconsideration of the decision. More water pouring on property in rain affects my safety (I'm 71). Soil washes and causing my husband and I mitigate manually. (limited funds) This is not light work. Taking on more water will alter this Zone X property to Zone A.

RESPONSE 3 – Not my issue

Challenge to RESPONSE 4 – Public Interest-Only 2 landowners in Hunt Co were notified (see list below on Comment 9), there was not a chance to get more public interest. The application explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility will discharge more effluent than is currently discharged, due to the fact that 1000 plus homes are being built, commercial business, zoning for apartments and more dense housing has been proposed by the city. Additionally, the explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility will discharge more effluent than is currently discharged, due to the fact that more than 1000 homes are being built NOW IN 2024 .Additional dense housing has been proposed by the city staff, sanctioned by PZ & Council. At the last zoning meeting a long time wastewater worker said we need to think about increasing sewer to 2.0MGD, so that statement says more certificate of obligation (non-voter bonds) and more wastewater flow.

Challenge to RESPONSE 5 – Flooding- Though TCEQ contends they do not have jurisdiction to address flooding, TCEQ alludes to an "Other requirement No 5." that the city provide protection for the wastewater treatment facilities from the 100 year flood. There is no indication of how the city is going to protect the wastewater treatment from a 100 year flood in the application that we can see. **There is no current flood study** so to complete this requirement may be impossible for the city as they cannot gauge protection. If TCEQ provides an approval, **they will be providing approval without full knowledge**. City should conduct a FEMA flood study of land north of the sewer plant that is being developed currently because it will affect the sewer plant as other development in the city has affected my property. City should also conduct a flood study at a minimum in the area that is in the one mile area adjacent to the discharge route-see Landowner Map in permit app. TCEQ does work with FEMA re: https://www.tceq.texas.gov/assets/public/comm_exec/agendas/worksess/backlog/2017-12-14/harvey.pdf. To preclude flooding TCEQ could lobby to work with FEMA to ensure flood maps are updated. Per conversation with a staff member of TCEQ Resource Protection Team, TexasFlood.org is a project of Department of Emergency Management, Texas Water Development Board (TWDB) and General Land Office. This indicates that an overall picture should be looked at before committing to a design without a flood plan and millions of dollars to implement design without protection. One of the TXWB responsibilities is "assists with regional water supply and flood planning that contributes to preparing the state water plan and state flood plan." <https://www.twdb.texas.gov/about/index.asp> I don't think TXWB is the same as the ED Water Quality Division.

Challenge to RESPONSE 6 – Air Pollution-Quality The EPA has already been called on the current sewer plant smell. The Windrose map is from McKinney TX 25 miles from Josephine. The Wind blows SSE according to the Windrose provided and as it happens, Josephine is SSE from McKinney with approximate same winds 4-25 mph on any given day. The wind always blows here. My home is southeast of the current sewer and I smell it. Magnolia folks live south of the Josephine Wastewater Plant2 and they smell odors from it on some days. Josephine Wastewater Plant2 is and SBR plant.



Challenge to RESPONSE 7 – Nuisance Odors- – see Response 6, but thank you for the phone numbers.

Response 8 – Not mine to challenge

Challenge to RESPONSE 9-Notices-No mailings received by most folks in Hunt County – Other permits have had mailings in addition to Paper Publications – The list of landowners supplied **on the application** only included 2 landowners in Hunt Co from what I can tell, Bockmehl and Bass. The list on the application did not include others in Hunt County who were Kevin Bowman 5784 FM6, Brian, Lauren Towel(Harrell) 5533 FM 6 James Akers 5509 FM 6 Josephine 75164/Caddo Mills 75135, Debra McCorkle, 5521 FM 6, Jay & Rochelle Wildfong, 5497 FM 6, Baron, 5475 FM 6, Lauren Harrell 5533 FM 6, Christina Jones, 5569 FM 6 Fabiola/Juan Aguilar 5581 FM 6 Blanca Basinger, and of course me. The Discharge goes directly to landowners with “55” in their address.

Challenge to RESPONSE 10 – application not totally correct – concerning Public Interest TCEQ-20960 form page 1 of 4 – I believe the second checkbox on this page should be checked because this project does have considerable public interest since it is being paid for by Certificates of Obligation for a minimum of \$10m with the City getting ready to ask for more Certificates of Obligation or other type funding. \$5,065,000 plus \$10,845,000 as of July 2022. – The third checkbox should be checked since Josephine is online as being in the DFW area. See this-<https://www.bestplaces.net/city/texas/josephine>
The explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility will discharge more effluent than is currently discharged, due to the fact that more than 1000 homes are being built NOW IN 2024 and commercial business and zoning for apartments and more dense housing has been proposed by the city administrator, sanctioned by PZ & Council and is in the works. At the last zoning meeting a long time wastewater worker said we need to think about increasing now, and that means more money. The City needs to be transparent or at a minimum appear to be transparent.

TCEQ Form -10054 form page8 of 80 Question 4 and 5 and 6 not answered. (Understand now this was not needed)
TCEQ Form -10054 form page 15 of 80 – checkboxes in Section 11, are not marked. Actually checkbox with “no” marked is incorrect. The City current lagoon road Caddo Street floods. The FEMA flood map shows Zone A directly below. This may be misunderstanding on my part but the Kimley Horn reports says both lagoon and SBR - **City Of Josephine Wastewater Master Plan Section 6.4 Lagoon Wastewater Treatment Plant – An additional .75 MGD**
Page 32 of 80 – C Waterbody aesthetics (of receiving water – Common setting: not offensive; developed by uncluttered, water may be colored or turbid. Actually walking in the creek there is evidence of trash from the developer in the creek.



Different kind of insulation/trash going to creek

Comment 11 – I understand the other respondents opposition

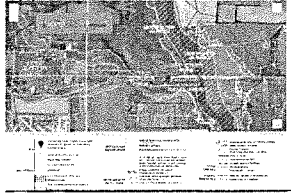
Challenge to Comment 13-Wildlife - Wastewater will affect wildlife, TCEQ Response says that that **water** in the state is to be safe for humans, therefore it is safe for wildlife. However, it has been determined that water has PFAS. Nearly all municipal wastewater treatment plants have measurable levels of PFAS in their discharge. The vast majority of that PFAS comes from upstream sources — such as industries, **household products, and human waste** — and flows through the facilities. See link .

<https://www.tceq.texas.gov/assistance/resources/the-advocate-1/funding-available-for-pfas-and-emerging-contaminants> (link broken)

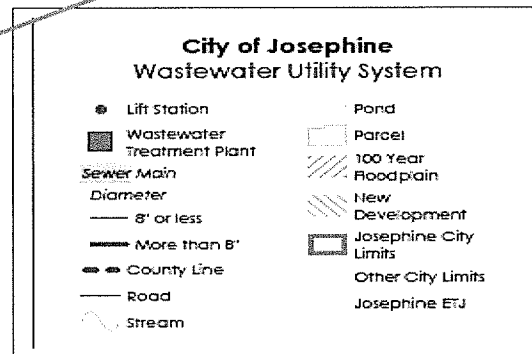
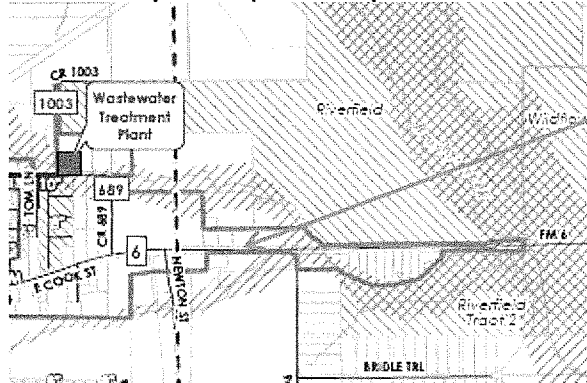
<https://www.eea.europa.eu/en/about/contact-us/faqs/what-are-pfas-and-how-are-they-dangerous-for-my-health#:~:text=They%20are%20known%20as%20'forever,Europe%20%E2%80%93%20PFAS%20for%20further%20information.>

Challenge to RESPONSE 14 – The applicant **only published the notice in the local Farmerville and Greenville papers AFTER Ridgway notified** them they were not transparent. The subscription is cost to Collin County Commercial Record is cost prohibitive – 3 mo. \$75, 6 mo.\$125, 1yr\$200. Collin County Commercial Record is not the largest circulation, at least Dallas Morning News has been used in the past, so not sure why they chose the Collin County as per their website. Per the website – “The Collin County Commercial Record is an important source for **business leads**. These types of up-to-date legal and business leads are published each weekday. Call (214) 733-8489 and subscribe today..” <http://collincountycommercialrecords.com/publications.html?mqiToken=yjwwptwd>

FEMA MAP 48085C0460J- THIS MAP IS 6/2/2009 The orange square is under development by DR HORTON and can significantly alter the site for the proposed sewer plant. It has NOT BEEN INCLUDED IN THE LOMR STUDIES BY DR HORTON. I know my land has been altered by the development, so I believe this property will be affected as well. My photographs show flooding where there has not been flooding. The application may say the proposed site is above the 100 year flood plain, however this entry must be based on 2009 data. The city had DR Horton make LOMRs for Riverfield, but evidently they missed this part of the development. I have driven on streets that have been made in the orange area, and the water dumps down a gravel chute. As the NEW SUBDIVISION streets progress to the CR 1003 water may be directed into the floodway, which could back up onto the sewer area. I did not see a flood mitigation anywhere in city documentation or application for the sewer.



Additionally there is already wastewater in the creek from the current lagoon system. My house
From the City of Josephine Comprehensive Plan



Please review document at this link – even the EPA recommends there needs to be flood mitigation for water and wastewater facilities.

https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf

1.3 Have you obtained FEMA Flood Maps? ☐ Yes ☐ No

If no, go to the [Map Source Center](#) to find FEMA Flood Maps, categorized by community. Flood Maps show areas that will be affected by both 100-year and 500-year floods. A "100-year flood" is a flood event that has a one percent chance of occurring in a given year. A "500-year flood" is a flood event that has a two tenths percent chance of occurring in a given year. Click on the icon to learn more about interpreting a Flood Map. If your Flood Map is not up to date, talk with your local community planning department or floodplain manager.



I have said many times the city needs new maps but it falls on dead ear. LOMR's finally started, but not for all property – like the sewer

Page 285 Collin County Hazard Mitigation Action Plan

When development is increasing the local official shall protect new and existing buildings from anticipated flood events.

When a community chooses to join the NFIP, it must require permits for all development in the SFH ensure that construction materials and methods used will minimize future flood damage. Permit files must contain documentation to substantiate how buildings were actually constructed. In return, the Federal Government makes flood insurance available for almost every building and its contents within the community.

Communities must ensure that their adopted floodplain management ordinance and enforcement procedures meet program requirements. Local regulations must be updated when additional data are provided by FEMA or when Federal or State standards are revised.

A more in-depth description of each jurisdiction's NFIP program is addressed in the jurisdictional annexes.

The sewer should have at least one structure for testing wastewater, if designed like current SBR. Drawings in permit are small. How will it be constructed?

Air Pollution –TCEQ needs to monitor the entire area Before the Magnolia/City of Josephine Wastewater 2 Plant, the waste stabilization pond/anaerobic pond/existing lagoon treatment plant facility used by the City of Josephine on Caddo Street did not emit any odor we could detect at our property. The Fountain View subdivision located in the City of Josephine was diverted to the SBR Plant constructed by DR HORTON, Magnolia MUD, and then given to the City contractually as City of Josephine Wastewater Plant 2. Currently that SBR plant which resides in the Magnolia MUD housing area releases odor that I smell at my property less than a mile away. If this new SBR plant releases the same odor, 1000+ homes or more in the area will not be smelling fresh country air. **See my challenge to RESPONSE 6** Granted, the Directors response says TCEQ does not monitor air quality but the McKinney MUNI AP (TX) Wind Rose was included in the documentation, therefore one has to conclude wind (and an assumed air quality) IS AN issue. <https://www.tceq.texas.gov/airquality/monops/>

Eco-environment The wooded Brushy Creek area behind my home houses hawks, birds, fowl, beaver, skunks, frogs, turtles, and more. Though chemicals treating sewer are not supposed to be harmful to fish, fowl, animals, an increase in the amount of flow may negate that thought. See **Challenge to Comment 13**.

Additionally, I request to be placed on the permanent mailing list for the City of Josephine permit number WQ0010887003 or new permit number.

Thank you for your consideration.

Vincent Redondo

IP 246971

From: PUBCOMMENT-OCC
Sent: Tuesday, February 20, 2024 9:01 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0010887003
Attachments: Jane Ridgway 5754 FM 6 Josephine-response on 2024-02-18.docx

H
PML for the permit

From: jridgway1971@gmail.com <jridgway1971@gmail.com>
Sent: Sunday, February 18, 2024 4:08 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0010887003

REGULATED ENTY NAME CITY OF JOSEPHINE WWTP NO 3

RN NUMBER: RN111735411

PERMIT NUMBER: WQ0010887003

DOCKET NUMBER:

COUNTY: COLLIN

PRINCIPAL NAME: CITY OF JOSEPHINE

CN NUMBER: CN600670178

NAME: Jane E Ridgway

EMAIL: jridgway1971@gmail.com

COMPANY:

ADDRESS: 5754 FM 6
JOSEPHINE TX 75189-4000

PHONE: 9728348686

FAX:

COMMENTS: This is my Second Response for TCEQ Permit No.: WQ0010887003 – this number is for the current lagoon and future SBR plant. It looks like a new comment period was opened contrary to what I thought was going to happen, so I am submitting again, as it looks like the whole timeline has been changed since the last comment period ended 1/4/2024 and I am not sure what happened. Why I believe my property is affected. Potential Flooding - My property backs up to the property owned by Kevin & Brittany Bowman at 5784 FM 6 ROYSE CITY TX 75189, who were NOT

notified. Their property is in the flood path of the unnamed tributary/Brushy Creek and has flooded before. See FEMA MAP 48231C0350G 1/6/2012. The owner LECHAU who was notified and gave easement is also in the floodpath. When it rains heavy, our property takes on water through the ground from the west, with fish flowing into our pond from the creek or wherever. We are getting land erosion already with the increase (about 185 houses) of Deberry, Murray Manor, Bradley Estates, and the 12 houses added to East St. which are west of our property. I anticipate it will be worse when almost 1900 homes (currently) are completed. From reading this document looks like the new Wastewater plant will dispense more water than is currently dispensed by the current lagoon. into the creeks. DR Horton is building 820 or more houses on the north side of the creek. I observed a huge downhill ditch into the creek from a stormwater culvert which will flood the creek in addition to the wastewater. Additionally, there has been no consideration about potential flooding and other issues associated with the PENDING NTMWD Monofil TCEQ PERMIT NO. WQ0005323000. This matter is currently being reviewed by SOAH which has not been scheduled for a hearing as of Dec 21, 2023. More houses PLUS more usage equals more water in the creek daily and potential monofil run-off gives an increased risk of adding my property to a zone A on FEMA flood map. All property owners along or near this creek are at risk of flooding. In 2015, flooding was experienced as far as Clay Drive. There has not been a new flood map for the City of Josephine since 2009 in Colling County and 2012 in Hunt County. Only LOMR studies by developers have been given to FEMA to receive a blessing before building, which is biased, in my opinion since the developers develop the flood maps. I know of no flood mitigation plan for this city. Please review document at this link – even the EPA recommends there needs to be flood mitigation for water and wastewater facilities. https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf Air Pollution – Before the Magnolia/City of Josephine Wastewater 2 Plant, the waste stabilization pond/anaerobic pond/existing lagoon treatment plant facility used by the City of Josephine on Caddo Street did not emit any odor we could detect at our property. The Fountain View subdivision located in the City of Josephine was diverted to the SBR Plant constructed by DR HORTON, Magnolia MUD, and then given to the City contractually as City of Josephine Wastewater Plant 2. Currently that SBR plant which resides in the Magnolia MUD housing area releases odor that I smell at my property less than a mile away. If this new SBR plant releases the same odor, at least more than 800 homes or more in the area will not be smelling fresh country air. 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Property owners who are not listed in documentation provided are: 1) -Parcel Owner: MCCORKLE DEBORAH D 5521 FM 6 CADDO MILLS 2) -Parcel Owner: AB PETROLEUM INC 507 E COOK ST JOSEPHINE, TX 75173 3) -Parcel Owner: AKERS JAMES ANDREW JR 5509 FM 6 CADDO MILLS TX 75135 4) -Parcel Owner: WILDFONG JAY D & ROCHELLE M 5497 FM 6 JOSEPHINE TX 75135 5) -Parcel Owner: BARRON COREY L & SYDNEY STUBBS 5475 FM 6 CADDO MILLS TX 75135 6) -Parcel Owner: BOWMAN KEVIN C & BRITTANY D 5784 FM 6 ROYSE CITY TX 75189 7) -Parcel Owner: RECTOR MARVIN 5792 FM 6 JOSEPHINE TX 75164 – PO BOX 461 – CADDO MILLS TX 75135 8) -Owner Name: STEPHEN DEAN HOMES INC PO BOX 941562 PLANO TX 75094 I believe these homeowners are as affected as the others listed with Caddo Mills addresses, as they are neighbors. Location and Distance of property/activities relative to proposed facility: ½ mi or less Specific description of how affected: see above- my property could potentially be put into an “A” flood map. My property has always been “X” This will have an economic effect (not property value) for current and future owners, specifically in flood mitigation since the city has not seemed to take this into consideration. <https://portadam.com/wp-content/uploads/2021/03/Portadam-Expanded-Flood-Fighting-Brochure.pdf> Additionally Erosion Control becomes an issue which costs money to mitigate.- <https://www.nrdc.org/stories/soil-erosion-101#control> While floodplains have benefits, there are not articles that discuss the benefit of dumping wastewater in a floodplain. There is however an article about how pollution can still be flowing in wastewater. <https://www.gao.gov/blog/thousands-discharges-keep-pollution-flowing-how-can-epa-better-protect-our-nations-waters#:~:text=These%20systems%20can%20discharge%20untreated,public%20health%20and%20water%20quality.> Hearing Request I request a contested case hearing because homeowners are at risk and some may not have been notified properly. TCEQ-20960 form page 1 of 4 – I believe the second checkbox on this page should be checked because

this project does have considerable public interest since it is being paid for by Certificates of Obligation for a minimum of \$10m with the City getting ready to ask for more Certificates of Obligation or other type funding. \$5,065,000 plus \$10,845,000 as of July 2022. - The third checkbox should be checked since Josephine is online as being in the DFW area. <https://www.bestplaces.net/city/texas/josephine> The explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility could/will discharge more effluent than is currently discharged, due to the fact that more than 1000 homes are being built and commercial business and zoning for apartments and more dense housing has been proposed by the city administrator. The City needs to be transparent or at a minimum appear to be transparent. TCEQ Form -10054 form page 8 of 80 Question 4 and 5 and 6 not answered. TCEQ Form -10054 form page 15 of 80 – checkboxes in Section 11, are not marked. The current lagoon road Caddo Street floods. The FEMA flood map shows Zone A directly below There are a lot of check boxes that are not marked. Additionally, I request to be placed on the permanent mailing list for the City of Josephine permit number WQ0010887003 or new permit number.

Renee Lyle

1P 246971

From: PUBCOMMENT-OCC
Sent: Tuesday, February 20, 2024 9:01 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0010887003
Attachments: Jane Ridgway 5754 FM 6 Josephine-response on 2024-02-18.docx

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PML for the permit

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To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0010887003

REGULATED ENTY NAME CITY OF JOSEPHINE WWTP NO 3

RN NUMBER: RN111735411

PERMIT NUMBER: WQ0010887003

DOCKET NUMBER:

COUNTY: COLLIN

PRINCIPAL NAME: CITY OF JOSEPHINE

CN NUMBER: CN600670178

NAME: Jane E Ridgway

EMAIL: jridgway1971@gmail.com

COMPANY:

ADDRESS: 5754 FM 6
JOSEPHINE TX 75189-4000

PHONE: 9728348686

FAX:

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TCEQ-20960 form page 1 of 4 – I believe the second checkbox on this page should be checked because

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ane Ridgway 5754 FM 6 Josephine, TX 75799, Mailing address P O Box 127 Caddo Mills TX 75135

This is my Second Response for TCEQ Permit No.: WQ0010887003 – this number is for the current lagoon and future SBR plant. It looks like a new comment period was opened contrary to what I thought was going to happen, so I am submitting again. It looks like the whole timeline has been changed since the last comment period ended 1/4/2024 and I am not sure what happened.

Regulated Entity:

RN111735411

TCEQ Docket No: Not Applicable

County: COLLIN

Principal Name:

Customer Number with TCEQ - CN600670178 - CITY OF JOSEPHINE -

Why I believe my property is affected.

Potential Flooding - My property backs up to the property owned by Kevin & Brittany Bowman at 5784 FM 6 ROYSE CITY TX 75189, who were NOT notified. Their property is in the flood path of the unnamed tributary/Brushy Creek and has flooded before. See FEMA MAP 8231C0350G 1/6/2012. The owner LECHAU who was notified and gave easement is also in the floodpath.

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Additionally, there has been no consideration about potential flooding and other issues associated with the **PENDING NTMWD Monofil TCEQ PERMIT NO. WQ0005323000**. This matter is currently being reviewed by SOAH which has not been scheduled for a hearing as of Dec 21, 2023.

More houses PLUS more usage equals more water in the creek daily and potential monofil run-off gives an increased risk of adding my property to a zone A on FEMA flood map. All property owners along or near this creek are at risk of flooding. In 2015, flooding was experienced as far as Clay Drive.

There has not been a new flood map for the City of Josephine since 2009 in Colling County and 2012 in Hunt County. Only LOMR studies by developers have been given to FEMA to receive a blessing before building, which is biased, in my opinion since the developers develop the flood maps.

I know of no flood mitigation plan for this city.

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Transparency. Though we were aware there was going to be a new sewer plant in the vicinity of the old wastewater pond, I was not notified of this particular permit and know my property is in the immediate area within 1100 ft of the flow of the plan sewer wastewater flow and/or Lechau easement. I have identified 8 other property owners who were not on the list of City of Josephine Landowner Cross Reference grid presented in the application.

Property owners who are not listed in documentation provided are:

1 - **Parcel Owner: MCCORKLE DEBORAH D**
521 FM 6 CADDO MILLS

2) -Parcel Owner: AB PETROLEUM INC
507 E COOK ST JOSEPHINE, TX 75173
3) -Parcel Owner: AKERS JAMES ANDREW JR
5509 FM 6 CADDO MILLS TX 75135

4) -Parcel Owner: WILDFONG JAY D & ROCHELLE M
5497 FM 6 JOSEPHINE TX 75135

5) -Parcel Owner: BARRON COREY L & SYDNEY STUBBS
5475 FM 6 CADDO MILLS TX 75135

6) -Parcel Owner: BOWMAN KEVIN C & BRITTANY D
5784 FM 6 ROYSE CITY TX 75189

7) -Parcel Owner: RECTOR MARVIN
5792 FM 6 JOSEPHINE TX 75164 – PO BOX 461 – CADDO MILLS TX 75135

8) -Owner Name: STEPHEN DEAN HOMES INC
PO BOX 941562 PLANO TX 75094

I believe these homeowners are as affected as the others listed with Caddo Mills addresses, as they are neighbors.

Name: Jane and James Ridgway
Address: 5754 FM 6 Josephine, TX 75189 P O Box 127 Caddo Mills TX 75135
Phone: 972-834-8686
Applicant: City of Josephine:
Proposed Permit Number: WQ0010887003

Location and Distance of property/activities relative to proposed facility: ½ mi or less
Specific description of how affected: see above- my property could potentially be put into an "A" flood map. My property has always been "X"

This will have an economic effect (not property value) for current and future owners, specifically in **flood mitigation** since the city has not seemed to take this into consideration. <https://portadam.com/wp-content/uploads/2021/03/Portadam-Expanded-Flood-Fighting-Brochure.pdf>

Additionally Erosion Control becomes an issue which costs money to mitigate.- <https://www.nrdc.org/stories/soil-erosion-101#control>

While floodplains have benefits, there are not articles that discuss the **benefit** of dumping wastewater in a floodplain. There is however an article about how pollution can still be flowing in wastewater. <https://www.gao.gov/blog/thousands-discharges-keep-pollution-flowing-how-can-epa-better-protect-our-nations-waters#:~:text=These%20systems%20can%20discharge%20untreated,public%20health%20and%20water%20quality.>

Hearing Request

I request a contested case hearing because homeowners are at risk and some may not have been notified properly.

TCEQ-20960 form page 1 of 4

- I believe the second checkbox on this page should be checked because this project does have considerable public interest since it is being paid for by Certificates of Obligation for a minimum of \$10m with the City getting ready to ask for more Certificates of Obligation or other type funding. \$5,065,000 plus \$10,845,000 as of July 2022.

- The third checkbox should be checked since Josephine is online as being in the DFW area.

<https://www.bestplaces.net/city/texas/josephine>

The explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility could/will discharge more effluent than is currently discharged, due to the fact that more than 1000 homes are being built and commercial business and zoning for apartments and more dense housing has been proposed by the city administrator.

The City needs to be transparent or at a minimum appear to be transparent.

TCEQ Form -10054 form page 8 of 80 Question 4 and 5 and 6 not answered.

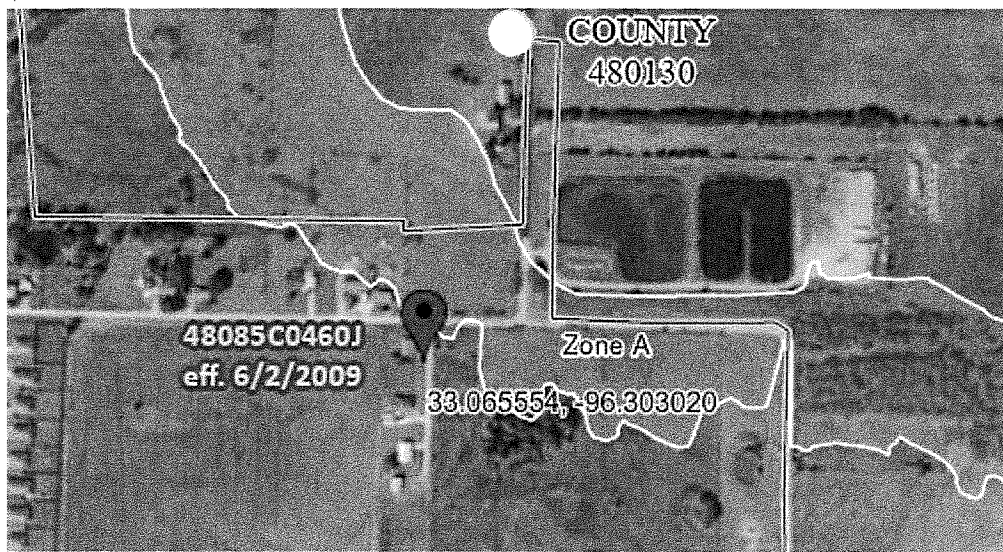
TCEQ Form -10054 form page 15 of 80 – checkboxes in Section 11, are not marked. The current lagoon road Caddo Street floods. The FEMA flood map shows Zone A directly below



There are a lot of check boxes that are not marked.

Additionally, I request to be placed on the permanent mailing list for the City of Josephine permit number WQ0010887003 or new permit number.

Thank you for your consideration.

Jane Ridgway.



FEMA Flood Zone Designations				
Undetermined Risk	Low Risk	Moderate Risk	High Risk	Coastal High Risk
Increasing Risk 				
Zone D	Zones C and X (unshaded)	Zones B and X (shaded)	Zones A, AE, A1-30, AH, AO, A99	Zones V, VE, V1-30
	Non-Special Flood Hazard Area (NSFHA)		Special Flood Hazard Area (SFHA)	

Why does the NEW permit have the same permit number as the OLD lagoon? They are two different types of wastewater plants.

Identify the outfall on a map. If there are some in Hunt County, there need to be a viewing in Hunt County pg 7 of 24 – letter dated 4-27-2023 Dunaway to CEQ.- how many at 33.065760 -96.298724?

Follow up on – page 31 Reporting Requirements – In which building are annual reports kept? Maintained on site on a monthly basis.

CEQ Form -10053 form page 9 of 24 – A & B are not checked

CEQ Form – 10053 page 18 says permit WQ00 New Permit EPA ID No. TX new permit

Link to actions so far:

https://www14.tceq.texas.gov/epic/eCID/index.cfm?fuseaction=main.detail&item_id=587547912023157&detail=action&StartRow=1&EndRow=1&Step=5&requesttimeout=5000

Activity Action List:

Date	Document Type	Action
1/04/2024	COMMENT PERIOD	END
2/19/2023	NEWSPAPER TEARSHEET	RECEIVED
2/19/2023	PUBLIC NOTICE VERIFICATION FORM	COMPLETE
2/19/2023	ALTERNATIVE LANGUAGE VERIFICATION FORM	RECEIVED

12/19/2023	AFFIDAVIT - APD	RECEIVED
12/19/2023	PUBLIC NOTICE VERIFICATION FORM	RECEIVED
12/05/2023	NOTICE - PRELIM DECISION	PUBLISHED
11/21/2023	<u>NOTICE - PRELIM DECISION</u>	MAILED
11/16/2023	FILE	RECEIVED
06/20/2023	VERIFICATION/APPLICATION	RECEIVED
06/20/2023	NEWSPAPER TEARSHEET	RECEIVED
06/20/2023	AFFIDAVIT - NORI	RECEIVED
06/20/2023	NOTICE OF RECEIPT/INTENT	COMPLETE
06/20/2023	ALTERNATIVE LANGUAGE VERIFICATION FORM	RECEIVED
06/15/2023	NOTICE OF RECEIPT/INTENT	PUBLISHED
06/14/2023	<u>LETTER</u>	SENT TO
06/07/2023	<u>NOTICE OF RECEIPT/INTENT</u>	MAILED
06/06/2023	NOTICE OF RECEIPT/INTENT	RECEIVED
06/06/2023	ADMIN REVIEW	COMPLETE
05/01/2023	APPLICATION	RECEIVED

Letter – 6/14/2023

City of Josephine, P.O. Box 99, Josephine, Texas 75164, has applied to the TCEQ for proposed Texas Pollutant Discharge Elimination System No. WQ0010887003 (EPA I.D. No. TX0144517) to authorize the discharge of treated wastewater at a volume not to exceed a daily average flow of 750,000 gallons per day.

Fig 5:

Constructed and Proposed New Developments in Josephine (2023)

New and Proposed Developments	Number of Units	Potential Population (2.9 persons/DU) Per Development
Bradley Estates	26	75
DeBerry Heritage	100	290
High Meadow Estates Ph. 2	196	568
Liberty Ranch	185	537
Liberty Ranch West	43	125
Meadow Ridge	141	409
Morningside Ph. 1	219	635
Murray Manor	51	148
TOTAL PER CURRENT CITY	961	2,787
Harvest Bend	11	32
Hidden Creek Village*	350	1,015
Magnolia Ph. 1-4	656	1,902
Magnolia Ph. 5-9	932	2,703
Magnolia Ph. 10	330	957
Morningside Ph. 2	406	1,177
Riverfield	821	2,381
Waverly Estates	784	2,274
Wildflower	3,061	8,877
TOTAL FOR CURRENT ETJ	7,351	21,318
Hunt County Proposed Dev.	TBD	TBD
TOTAL FOR OUTSIDE ETJ	TBD	TBD
TOTAL FOR ALL NEW DEVELOPMENT	8,312	24,105

description – about the size of my house I think

50,000 Gallon Corrugated Bolted Steel Tank with dimensions of 74.3 feet in diameter and 24.1 high. 10° low J rib roof with a long list of accessories including OSHA Approved Ladders, Cages, Appurtenances, Lockable Deck manways, and Roof Vents. Each tank comes with an SF61 Certified Liner of 30-60 mil flexible membrane. The Zinc Galvanized Steel in both G115 & G140 come standard and each tank can also have exterior insulation included. Get a quote on this tank for your next Fire Protection, Potable Water Storage, Irrigation, Rainwater Harvesting, or Wastewater project.

Manufacturer	<i>SteelCore Tanks</i>
Gallons	<i>750000</i>
Size (Gallon)	<i>750000</i>
Nominal Gallons	<i>766535</i>
M3	<i>2901.65</i>
BBL	<i>24334.44</i>
Roof	<i>10° low J rib</i>
Diameter	<i>74.3</i>
Eve Height	<i>24.1</i>
Overall Height FT.	<i>31.8</i>
Manufacturer	<i>SteelCore Tanks</i>
Accessories	<i>OSHA Approved ladders, cages, appurtenances, Lockable Deck manways, Side Shell Manway, Roof vents</i>
Additional Accessories	<i>Catwalks & Other Specialty Systems. Liquid Level Gauge Board and Target</i>

Interior Liner	ASTM F61 Certified Coatings / Liners, 30-60 mil flexible membr
Structural Design	IBC and ASCE7 Structural code for water storage
Exterior Color Options	Available
NFPA 22 Compliant Fire protection	Yes
Seismic Anchoring Design	Yes
High Wind Designs	Yes
Material	Zinc Galvanized Steel â€” G115 & G140
Insulation Systems Interior	Available
Insulation Systems Exterior	Available
Fittings	ASTM Bolts, Flanges â€” ANSI150#, Wall Penetrations, Floor Penetrations

Renee Lyle

From: PUBCOMMENT-OCC
Sent: Friday, December 22, 2023 12:44 PM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0010887003
Attachments: Filed-Jane Ridgway 5754 FM 6 Josephine-shortversion.docx

eComment = PML+, H
Attachment = PML+, H

From: jridgway1971@gmail.com <jridgway1971@gmail.com>
Sent: Friday, December 22, 2023 12:19 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0010887003

REGULATED ENTY NAME CITY OF JOSEPHINE WWTP NO 3

RN NUMBER: RN111735411

PERMIT NUMBER: WQ0010887003

DOCKET NUMBER:

COUNTY: COLLIN

PRINCIPAL NAME: CITY OF JOSEPHINE

CN NUMBER: CN600670178

NAME: Jane E Ridgway

EMAIL: jridgway1971@gmail.com

COMPANY:

ADDRESS: 5754 FM 6
JOSEPHINE TX 75189-4000

PHONE: 9728348686

FAX:

COMMENTS: Please review the document that is attached. I believe that the city might need to do a bit more work to ensure flooding and air pollution is not going to occur with this new plant. Also there were 8 people who I believe were not notified properly whose addresses are included in the document. They live next to some people who were notified I request a contested hearing at this time and will attempt to notify people who I believe should have been included in the permit. My mailing address is P O Box 127 Caddo Mills, because I live in HUNT CO, but I live within a 1/2 mile of the

proposed plant. Please put me on a PERMANENT MAILING LIST for any action with this permit and other permits by the City of Josephine. Thank you.

ane Ridgway 5754 FM 6 Josephine, TX 75189, Mailing address P O Box 127 Caddo Mills, TX 75135

Response for TCEQ Permit No.: WQ0010887003 – this number is for the current lagoon and future SBR plant

Regulated Entity:

RN111735411

TCEQ Docket No: Not Applicable

County: COLLIN

Principal Name:

Customer Number with TCEQ - CN600670178 - CITY OF JOSEPHINE -

Why I believe my property is affected.

Potential Flooding - My property backs up to the property owned by Kevin & Brittany Bowman at 5784 FM 6 ROYSE CITY TX 75189, who were NOT notified. Their property is in the flood path of the unnamed tributary/Brushy Creek and has flooded before. See FEMA MAP 8231C0350G 1/6/2012. The owner LECHAU who was notified and gave easement is also in the floodpath.

When it rains heavy, our property takes on water through the ground from the west, with fish flowing into our pond from the creek or wherever. We are getting land erosion already with the increase (about 185 houses) of Deberry, Murray Manor, Bradley Estates, and the 12 houses added to East St. which are west of our property. I anticipate it will be worse when almost 1900 homes (currently) are completed.

From reading this document looks like the new Wastewater plant will dispense more water than is currently dispensed by the current lagoon. Up to the creeks. DR Horton is building 820 or more houses on the north side of the creek. I observed a huge downhill ditch into the creek from stormwater culvert which will flood the creek in addition to the wastewater.

Additionally, there has been no consideration about potential flooding and other issues associated with the **PENDING NTMWD Monofil TCEQ PERMIT NO. WQ0005323000**. This matter is currently being reviewed by SOAH which has not been scheduled for a hearing as of Dec 21, 2023.

More houses PLUS more usage equals more water in the creek daily and potential monofil run-off gives an increased risk of adding my property to a zone A on FEMA flood map. All property owners along or near this creek are at risk of flooding. In 2015, flooding was experienced as far as Clay Drive.

There has not been a new flood map for the City of Josephine since 2009 in Colling County and 2012 in Hunt County. Only LOMR studies by developers have been given to FEMA to receive a blessing before building, which is biased, in my opinion since the developers develop the flood maps.

I know of no flood mitigation plan for this city.

Please review document at this link – even the EPA recommends there needs to be flood mitigation for water and wastewater facilities.
https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf

Air Pollution – Before the Magnolia/City of Josephine Wastewater 2 Plant, the waste stabilization pond/anaerobic pond/existing lagoon treatment plant facility used by the City of Josephine on Caddo Street did not emit any odor we could detect at our property. The Fountain view subdivision located in the City of Josephine was diverted to the SBR Plant constructed by DR HORTON, Magnolia MUD, and then given to the City contractually as City of Josephine Wastewater Plant 2. Currently that SBR plant which resides in the Magnolia MUD housing area releases odor that I smell at my property less than a mile away. If this new SBR plant releases the same odor, at least more than 800 homes or more in the area will not be smelling fresh country air.

Granted, TCEQ does not monitor air quality but the McKinney MUNI AP (TX) Wind Rose was included in the documentation, therefore one has to conclude wind (and an assumed air quality) could be an issue.

Co-environment The wooded Brushy Creek area behind my home houses hawks, birds, fowl, beaver, skunks, frogs, turtles, and more. Rough chemicals treating sewer are not supposed to be harmful to fish, fowl, animals, an increase in the amount of flow may negate that thought.

Transparency. Though we were aware there was going to be a new sewer plant in the vicinity of the old wastewater pond, I was not notified of this particular permit and know my property is in the immediate area within 1100 ft of the flow of the plan sewer wastewater flow and/or Lechau easement. I have identified 8 other property owners who were not on the list of City of Josephine Landowner Cross Reference grid presented in the application.

Property owners who are not listed in documentation provided are:

-Parcel Owner: MCCORKLE DEBORAH D
521 FM 6 CADDO MILLS

-Parcel Owner: AB PETROLEUM INC
17 E COOK ST JOSEPHINE, TX 75173

3) -Parcel Owner: AKERS JAMES ANDREW J
5509 FM 6 CADDO MILLS TX 75135

4) -Parcel Owner: WILDFONG JAY D & ROCHELLE M
5497 FM 6 JOSEPHINE TX 75135

5) -Parcel Owner: BARRON COREY L & SYDNEY STUBBS
5475 FM 6 CADDO MILLS TX 75135

6) -Parcel Owner: BOWMAN KEVIN C & BRITTANY D
5784 FM 6 ROYSE CITY TX 75189

7) -Parcel Owner: RECTOR MARVIN
5792 FM 6 JOSEPHINE TX 75164 – PO BOX 461 – CADDO MILLS TX 75135

8) -Owner Name: STEPHEN DEAN HOMES INC
PO BOX 941562 PLANO TX 75094

I believe these homeowners are as affected as the others listed with Caddo Mills addresses, as they are neighbors.

Name: Jane and James Ridgway
Address: 5754 FM 6 Josephine, TX 75189 P O Box 127 Caddo Mills TX 75135
Phone: 972-834-8686
Applicant: City of Josephine:
Proposed Permit Number: WQ0010887003

Location and Distance of property/activities relative to proposed facility: ½ mi or less
Specific description of how affected: see above- my property could potentially be put into an "A" flood map. My property has always been "X"

This will have an economic effect (not property value) for current and future owners, specifically in **flood mitigation** since the city has not seemed to take this into consideration. <https://portadam.com/wp-content/uploads/2021/03/Portadam-Expanded-Flood-Fighting-Brochure.pdf>

Additionally Erosion Control becomes an issue which costs money to mitigate.- <https://www.nrdc.org/stories/soil-erosion-101#control>

While floodplains have benefits, there are not articles that discuss the **benefit** of dumping wastewater in a floodplain. There is however an article about how pollution can still be flowing in wastewater. <https://www.gao.gov/blog/thousands-discharges-keep-pollution-flowing-how-can-epa-better-protect-our-nations-waters#:~:text=These%20systems%20can%20discharge%20untreated,public%20health%20and%20water%20quality.>

Hearing Request

I request a contested case hearing because homeowners are at risk and some may not have been notified properly.

TCEQ-20960 form page 1 of 4

- I believe the second checkbox on this page should be checked because this project does have considerable public interest since it is being paid for by Certificates of Obligation for a minimum of \$10m with the City getting ready to ask for more Certificates of Obligation or other type funding. \$5,065,000 plus \$10,845,000 as of July 2022.

- The third checkbox should be checked since Josephine is online as being in the DFW area.

<https://www.bestplaces.net/city/texas/josephine>

The explanation about a Public Involvement Plan not being applicable because the activity exists in the same property boundary does not negate the fact that the new facility could/will discharge more effluent than is currently discharged, due to the fact that more than 1000 homes are being built and commercial business and zoning for apartments and more dense housing has been proposed by the city administrator.

The City needs to be transparent or at a minimum appear to be transparent.

TCEQ Form -10054 form page 8 of 80 Question 4 and 5 and 6 not answered.

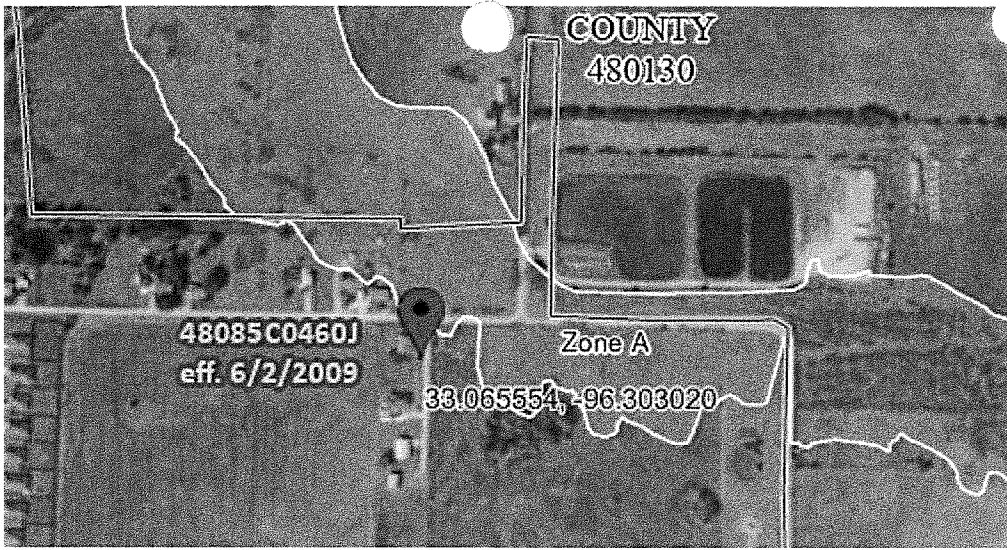
TCEQ Form -10054 form page 15 of 80 – checkboxes in Section 11, are not marked. The current lagoon road Caddo Street floods. The FEMA flood map shows Zone A directly below

There are a lot of check boxes that are not marked.


Additionally, I request to be placed on the permanent mailing list for the City of Josephine permit number WQ0010887003 or new permit number.

Thank you for your consideration.

Jane Ridgway.



FEMA Flood Zone Designations

Undetermined Risk	Low Risk	Moderate Risk	High Risk	Coastal High Risk
Increasing Risk →				
Zone D	Zones C and X (unshaded)	Zones B and X (shaded)	Zones A, AE, A1-30, AH, AO, A99	Zones V, VE, V1-30
	Non-Special Flood Hazard Area (NSFHA)		Special Flood Hazard Area (SFHA)	

CEQ Form -10053 form page 9 of 24 – A & B are not checked

CEQ Form – 10053 page 18 says permit WQ00 New Permit EPA ID No. TX new permit