

**TCEQ DOCKET NO. 2024-1813-MWD**

<b>APPLICATION BY</b>	<b>§</b>	<b>BEFORE</b>
<b>CADDO MILLS LAGUNA LAND</b>	<b>§</b>	<b>THE TEXAS COMMISSION</b>
<b>AZURE, LLC FOR NEW TPDES PERMIT</b>	<b>§</b>	<b>ON</b>
<b>NO. WQ0016434001</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>

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**EXECUTIVE DIRECTOR'S RESPONSE TO A HEARING REQUEST**

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**I.     INTRODUCTION**

The Executive Director (ED) of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Hearing Requests on the application by Caddo Mills Laguna Land Azure, LLC (Applicant) for new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0016434001. The City of Caddo Mills, through its representative Stephen C. Dickman, filed a timely request (Request) for a Contested Case Hearing (Hearing).

**II.     ATTACHMENTS FOR COMMISSION CONSIDERATION**

- Attachment A - ED's GIS Map

**III.    DESCRIPTION OF THE FACILITY, DISCHARGE ROUTE, AND THE EXECUTIVE DIRECTOR'S TECHNICAL REVIEW**

The Applicant applied to TCEQ for new TPDES Permit No. WQ0016434001 to authorize the discharge of treated domestic wastewater (effluent) at a daily average flow not to exceed 0.15 million gallons per day (MGD) in the Interim I Phase, a daily average flow not to exceed 0.30 MGD in the Interim II Phase, and a daily average flow not to exceed 0.95 MGD in the Final Phase. The Mykonos Wastewater Treatment Facility (WWTF) will be an activated sludge process plant operated in the complete mix mode. Treatment units in the Interim I Phase will include an on-site lift station, a bar screen, two aeration basins, a clarifier, two aerobic digesters, and a chlorine contact chamber. Treatment units in the Interim II phase will include an on-site lift station, a bar screen, three aeration basins, a clarifier, two aerobic digesters, and a chlorine contact chamber. Treatment units in the Final phase will include an on-site lift station, a bar screen, nine aeration basins, three clarifiers, six aerobic digesters, three chlorine contact chambers, and dichlorination. The facility has not been constructed.

The effluent limitations and monitoring requirements for those parameters that are limited in the draft permit are as follows:

### INTERIM I PHASE EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The daily average flow of effluent shall not exceed 0.15 MGD, nor shall the average discharge during any two-hour period exceed 417 gallons per minute.

Effluent Characteristic	Discharge Limitations			
	Daily Avg mg/l (lbs/day)	7-day Avg mg/l	Daily Max mg/l	Single Grab mg/l
Flow, MGD	Report	N/A	Report	N/A
Carbonaceous Biochemical Oxygen Demand (5-day)	10 (13)	15	25	35
Total Suspended Solids	15 (19)	25	40	60
Ammonia Nitrogen	3 (3.8)	6	10	15
<i>E. coli</i> colony-forming units or most probable number per 100 ml	126	N/A	N/A	399

The effluent shall contain a total chlorine residual of at least 1.0 mg/L and shall not exceed a total chlorine residual of 4.0 mg/L after a detention time of at least 20 minutes, based on peak flow, and shall be monitored five times per week by grab sample. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

The pH shall not be less than 6.0 standard units (SU) nor greater than 9.0 SU and shall be monitored once per month by grab sample. There shall be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/L and shall be monitored once per week by grab sample.

### INTERIM II PHASE EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The daily average flow of effluent shall not exceed 0.30 MGD, nor shall the average discharge during any two-hour period exceed 833 gallons per minute.

Effluent Characteristic	Discharge Limitations			
	Daily Avg mg/l (lbs/day)	7-day Avg mg/l	Daily Max mg/l	Single Grab mg/l
Flow, MGD	Report	N/A	Report	N/A
Carbonaceous Biochemical Oxygen Demand (5-day)	10(25)	15	25	35
Total Suspended Solids	15 (38)	25	40	60
Ammonia Nitrogen	3 (8)	6	10	15
<i>E. coli</i> colony-forming units or most probable number per 100 ml	126	N/A	N/A	399

The effluent shall contain a total chlorine residual of at least 1.0 mg/L and shall not exceed a total chlorine residual of 4.0 mg/L after a detention time of at least 20 minutes, based on peak flow, and shall be monitored five times per week by grab sample. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

The pH shall not be less than 6.0 standard units (SU) nor greater than 9.0 SU and shall be monitored once per month by grab sample. There shall be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/L and shall be monitored once per week by grab sample.

#### *FINAL PHASE EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS*

The daily average flow of effluent shall not exceed 0.95 MGD, nor shall the average discharge during any two-hour period exceed 2,639 gallons per minute.

Effluent Characteristic	Discharge Limitations			
	Daily Avg mg/l (lbs/day)	7-day Avg mg/l	Daily Max mg/l	Single Grab mg/l
Flow, MGD	Report	N/A	Report	N/A
Carbonaceous Biochemical Oxygen Demand (5-day)	10 (79)	15	25	35
Total Suspended Solids	15 (119)	25	40	60
Ammonia Nitrogen	3 (24)	6	10	15
<i>E. coli</i> colony-forming units or most probable number per 100 ml	126	N/A	N/A	399

The effluent shall contain a total chlorine residual of at least 1.0 mg/L after a detention time of at least 20 minutes, based on peak flow, and shall be monitored daily by grab sample. The permittee shall dechlorinate the chlorinated effluent to less than 0.1 mg/L total chlorine residual and shall monitor total chlorine residual daily by grab sample after dichlorination process. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

The pH shall not be less than 6.0 standard units (SU) nor greater than 9.0 SU and shall be monitored twice per week by grab sample. There shall be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/L and shall be monitored once per week by grab sample.

The plant site will be located approximately 0.25 miles southwest of the intersection of Farm-to-Market Road 1565 and County Road 2628, in Hunt County, Texas 75201. The treated effluent will be discharged to an unnamed tributary, thence to Brushy Creek, thence to West Caddo Creek, thence to Caddo Creek, thence to Lake Tawakoni in Segment No. 0507 of the Sabine River Basin. The unclassified receiving water use is limited aquatic life use for the unnamed tributary and Brushy Creek. The designated uses for Segment No. 0507 are primary contact recreation, public water supply, and high aquatic life use. In accordance with 30 Texas Administrative Code

(TAC) Section (§) 307.5 and the TCEQ's Procedures to Implement the Texas Surface Water Quality Standards (June 2010), an antidegradation review of the receiving waters was performed. A Tier 1 antidegradation review preliminarily determined that existing water quality uses will not be impaired by this permit action. Numerical and narrative criteria to protect existing uses will be maintained. This review has preliminarily determined that no water bodies with exceptional, high, or intermediate aquatic life uses are present within the stream reach assessed; therefore, no Tier 2 degradation determination is required. No significant degradation of water quality is expected in water bodies with exceptional, high, or intermediate aquatic life uses downstream, and existing uses will be maintained and protected. The preliminary determination can be reexamined and may be modified if new information is received.

#### IV. PROCEDURAL HISTORY

TCEQ received the application on October 23, 2023, and declared it administratively complete on January 4, 2024. The Applicants published the Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) in English in the *Herald-Banner* on January 27, 2024 and in Spanish in *Al Dia* on January 31, 2024. The ED completed the technical review of the application on February 2, 2024, and prepared the proposed permit, which if approved, would establish the conditions under which the WWTF must operate. The Applicants published a Notice of Application and Preliminary Decision (NAPD) in English in the *Herald-Banner* on April 27, 2024, and in Spanish in *Al Dia* on May 1, 2024. The public comment period ended on May 31, 2024, the ED's Response to Public Comment (RTC) was mailed on September 5, 2024, and the time for filing Requests for a Hearing or a Request for Reconsideration (RFR) ended on October 7, 2024. Because this application was received after September 1, 2015, and because it was declared administratively complete after September 1, 1999, it is subject to both the procedural requirements adopted pursuant to House Bill 801, 76th Legislature, 1999, and the procedural requirements and rules implementing Senate Bill 709, 84<sup>th</sup> Legislature, 2015, which are implemented by the Commission in its rules in 30 TAC Chapters 39, 50, and 55.

#### V. ACCESS TO RULES, LAWS AND RECORDS

- All administrative rules: Secretary of State Website: [www.sos.state.tx.us](http://www.sos.state.tx.us)
- TCEQ rules: Title 30 of the Texas Administrative Code: [www.sos.state.tx.us/tac/](http://www.sos.state.tx.us/tac/) (select TAC Viewer on the right, then Title 30 Environmental Quality)
- Texas statutes: [www.statutes.capitol.texas.gov](http://www.statutes.capitol.texas.gov)
- TCEQ website: [www.tceq.texas.gov](http://www.tceq.texas.gov) (for downloadable rules in WordPerfect or Adobe PDF formats, select "Rules, Policy, & Legislation," then "Current TCEQ Rules," then "Download TCEQ Rules");
- Federal rules: Title 40 of the Code of Federal Regulations (C.F.R.) [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl)
- Federal environmental laws: <http://www.epa.gov/lawsregs/>
- Environmental or citizen complaints may be filed electronically at: <https://www.tceq.texas.gov/compliance/complaints> (select "use our online form") or by sending an email to the following address: [complaint@TCEQ.texas.gov](mailto:complaint@TCEQ.texas.gov)

Commission records for the WWTF are available for viewing and copying at TCEQ's main office in Austin, 12100 Park 35 Circle, Building F, 1st Floor (Office of Chief Clerk, for the current application until final action is taken). Some documents

located at the Office of the Chief Clerk may also be located in the TCEQ Commissioners' Integrated Database at [www.tceq.texas.gov/goto/cid](http://www.tceq.texas.gov/goto/cid). The permit application has been available for viewing and copying at Caddo Mills City Hall, 2313 Main Street, Caddo Mills, Texas, since publication of the NORI. The final permit application, proposed permit, statement of basis/technical summary, and the ED's preliminary decision have been available for viewing and copying at the same location since publication of the NAPD.

If you would like to file a complaint about the WWTF concerning its compliance with the provisions of its permit or with TCEQ rules, you may contact the TCEQ Regional Office (Region 4) in Fort Worth, TX at (817) 588-5800 or the statewide toll-free number at 1-888-777-3186 to address potential permit violations. In addition, complaints may be filed electronically by using the methods described above in the seventh bullet point of section five (Access to Rules, Laws, and Records). If an inspection by the Regional Office finds that the Applicants are not complying with all the requirements of the permit, or that the WWTF is out of compliance with TCEQ rules, enforcement actions may arise.

## **VI. EVALUATION OF HEARING REQUESTS**

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment and the Commission's consideration of hearing requests (Requests). The Commission implemented HB 801 by adopting procedural rules in 30 TAC chapters 39, 50, and 55. Senate Bill 709 revised the requirements for submitting public comment and the commission's consideration of Requests. This application was declared administratively complete on September 13, 2023; therefore, it is subject to the procedural requirements adopted pursuant to both HB 801 and SB 709

### **A. LEGAL AUTHORITY TO RESPOND TO HEARING REQUESTS**

"The executive director, the public interest counsel, and applicant may submit written responses to [hearing] requests . . . ."<sup>1</sup>

1. whether the requestor is an affected person;
2. whether issues raised in the hearing request are disputed;
3. whether the dispute involves questions of fact or law;
4. whether the issues were raised during the public comment period;
5. whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter by filing a written withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment;
6. whether the issues are relevant and material to the decision on the application; and
7. a maximum expected duration for the contested case hearing.<sup>2</sup>

### **B. HEARING REQUEST REQUIREMENTS**

To consider a Request, the Commission must first conclude that the requirements in 30 TAC §§ 55.201 and 55.203, are met as follows.

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<sup>1</sup> 30 TAC § 55.209(d).

<sup>2</sup> *Id.* at § 55.209(e).

A request for a contested case hearing by an affected person must be in writing, filed with the chief clerk within the time provided . . . , based only on the requester's timely comments, and not based on an issue that was raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment.<sup>3</sup>

A hearing request must substantially comply with the following:

- (1) give the name, address, telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who is responsible for receiving all official communications and documents for the group;
- (2) identify the person's justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;
- (4) for applications filed;
  - (B) on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.<sup>4</sup>

**C. REQUIREMENT THAT REQUESTOR BE AN AFFECTED PERSON**

To grant a contested case hearing, the commission must determine, pursuant to 30 TAC § 55.203, that a requestor is an affected person.

- (a) For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the public does not qualify as a personal justiciable interest.
- (b) Governmental entities, including local governments and public agencies with authority under state law over issues raised by the application, may be considered affected persons.
- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
  - (1) whether the interest claimed is one protected by the law under which the application will be considered;

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<sup>3</sup> 30 TAC § 55.201(c).

<sup>4</sup> *Id.* at § 55.201(d).

- (2) distance restrictions or other limitations imposed by law on the affected interest;
  - (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
  - (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
  - (5) likely impact of the regulated activity on use of the impacted natural resource by the person; and
  - (6) whether the requester timely submitted comments on the application which were not withdrawn; and
  - (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.<sup>5</sup>
- (d) In making this determination, the commission may also consider, to the extent consistent with case law:
- (1) the merits of the underlying application and supporting documentation in the commission's administrative record, including whether the application meets the requirements for permit issuance;
  - (2) the analysis and opinions of the ED; and
  - (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.<sup>6</sup>

#### **D. REFERRAL TO THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

“When the commission grants a request for a contested case hearing, the commission shall issue an order specifying the number and scope of the issues to be referred to State Office of Administrative Hearing (SOAH) for a hearing.”<sup>7</sup> “The commission may not refer an issue to SOAH for a contested case hearing unless the commission determines that the issue:

- (1) involves a disputed question of fact or a mixed question of law and fact;
- (2) was raised during the public comment period by an affected person; and
- (3) is relevant and material to the decision on the application.”<sup>8</sup>

### **VII. ANALYSIS OF THE HEARING REQUESTS**

For this permit application the relevant public comment period ended on May 31, 2024, and the time for filing Requests for a Hearing or a Request for Reconsideration (RFR) ended on October 7, 2024. The ED's analyses determined whether the Requests followed TCEQ rules, if the requestors qualify as affected persons, what issues may be referred for a possible hearing, and the length of that hearing.

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<sup>5</sup> 30 TAC § 55.203(a)-(c).

<sup>6</sup> *Id.* at § 55.203(d).

<sup>7</sup> 30 TAC § 50.115(b).

<sup>8</sup> *Id.* at § 55.203(d).

**A. WHETHER THE REQUEST COMPLIED WITH 30 TAC §§ 55.201(C) AND (D).**

1. **The City of Caddo Mills** (the “City”) filed a timely, written Request that provided the requisite contact information, raised issues that form the basis of its Request in timely comments not withdrawn before the RTC was filed, and requested a hearing.

The City’s Request complied with 30 TAC §§ 55.201(c) and (d) because the Request effectively identified personal justiciable interests in a written explanation plainly describing why the City believes it will be affected by the application in a way not common to the public. The City’s Request states that the proposed facility will be located within its extraterritorial jurisdiction (ETJ), and the GIS Map prepared by the ED’s staff confirms that the proposed facility will be within the City’s ETJ. The City raised issues related to facility design, antidegradation, wildlife, nuisance odors, regionalization, and flood protections.

The ED recommends finding that the Request of the City of Caddo Mills substantially complied with 30 TAC §§ 55.201(c) and (d).

**B. WHETHER REQUESTOR IS AN AFFECTED PERSON UNDER 30 TAC § 55.203.**

1. **The City of Caddo Mills** filed a Request that effectively demonstrates that the City has statutory authority over an issue relevant to the Commission’s consideration of the application.

The City’s Request stated that the City owns a wastewater treatment facility within 3 miles of the proposed facility. The City further states that it has the capacity and willingness to serve Applicant’s proposed service area. The City’s interest in accepting waste flows from Applicant’s proposed service area through the City’s existing facility is protected under the state’s regionalization policy and demonstrates that the City has a statutory interest in an issue relevant to the Commission’s consideration of the application.

Therefore, the ED recommends the Commission find the City of Caddo Mills is an affected person under 30 TAC § 55.203 and grant its hearing request.

**VIII. ISSUES RAISED IN THE HEARING REQUEST:**

The Requests raised the issues below.

1. **Whether the antidegradation review complies with applicable regulations and the Draft Permit includes adequate nutrient limits.**

(RTC Response Nos. 3 & 5) This issue involves a disputed question of mixed fact and law. If it can be shown that the antidegradation review did not comply with applicable regulations or that the Draft Permit should include additional or stricter effluent limitations, then that information would be relevant and material to a decision on this application.

The ED concludes this issue is relevant and material, and if this case is referred to SOAH, the ED recommends the Commission refer this issue.



**2. Whether the draft permit is protective of wildlife, aquatic life, and vegetation.**

(RTC Response No. 4) This issue involves a disputed question of mixed fact and law. If it can be shown that the draft permit is not protective of wildlife, aquatic life, and vegetation, in accordance with applicable regulations, then that information would be relevant and material to a decision on this application.

The ED concludes this issue is relevant and material, and if this case is referred to SOAH, the ED recommends the Commission refer this issue.

**3. Whether the draft permit adequately addresses nuisance odors in compliance with 30 Texas Administrative Code § 309.13(e).**

(RTC Response No. 6) This issue involves a disputed question of mixed fact and law. If it can be shown that the draft permit does not require adequate nuisance odor prevention, then that information would be relevant and material to a decision on this application.

The ED concludes this issue is relevant and material, and if this case is referred to SOAH, the ED recommends the Commission refer this issue.

**4. Whether Applicant complied with the regionalization policy pursuant to Texas Water Code §§ 26.0282 & 26.081.**

(RTC Response No. 1) This issue involves a disputed question of mixed fact and law. If it can be shown that Applicant did not comply with its regionalization obligations, then that information would be relevant and material to a decision on this application.

The ED concludes this issue is relevant and material, and if this case is referred to SOAH, the ED recommends the Commission refer this issue.

**5. Whether the Draft Permit should require protections from the 100-year flood event as contemplated by 30 Texas Administrative Code § 309.13(a).**

(RTC Response No. 8) This issue involves a disputed question of mixed fact and law. If it can be shown that the Draft Permit should require inundation protections from a 100-year flood event, then that information would be relevant and material to a decision on this application.

The ED concludes this issue is relevant and material, and if this case is referred to SOAH, the ED recommends the Commission refer this issue.

**6. Whether the proposed facility will be designed according to 30 Texas Administrative Code Chapter 217 such that it can treat waste to the Draft Permit's specifications.**

(RTC Response No. 2) This issue involves a disputed question of mixed fact and law. However, pursuant to 30 TAC § 217.6(a), an owner is not required to submit facility plans and specifications to the executive director for approval prior to the commission issuing the wastewater treatment facility's wastewater permit.

The ED concludes this issue is not relevant and material, and if this case is referred to SOAH, the ED recommends the Commission not refer this issue.

IX. CONTESTED CASE HEARING DURATION

If the Commission grants a hearing on this application, the ED recommends that the duration of the hearing be 180 days from the preliminary hearing to the presentation of a proposal for decision to the Commission.

X. REQUESTS FOR RECONSIDERATION

No Requests for Reconsideration were submitted.

XI. EXECUTIVE DIRECTOR'S RECOMMENDATION

The ED recommends the following actions by the Commission:

1. Find that the City of Caddo Mills is an affected person under 30 TAC § 55.203.
2. Grant the Hearing Requests of the City of Caddo Mills.
3. Should the Commission decide to refer this case to SOAH:
  - a. refer the case to Alternative Dispute Resolution for a reasonable time; and
  - b. refer issues 1 through 5 above in section VIII. to SOAH for a contested case hearing.
4. Should the Commission decide to deny the Requests, issue the Draft Permit as written.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel, *Executive Director*

Philip Ledbetter, *Director*  
Office of Legal Services

Charmaine Backens, *Deputy Director*  
Environmental Law Division



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Bradford Eckhart, Staff Attorney  
Environmental Law Division  
State Bar No. 24137368  
P.O. Box 13087, MC 173  
Austin, Texas 78711 3087  
Telephone No. 512-239-1283  
Email: bradford.eckhart@tceq.texas.gov

REPRESENTING THE EXECUTIVE DIRECTOR  
OF THE TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

XII. CERTIFICATE OF SERVICE

I certify that on December 2, 2024, the Executive Director's Response to Hearing Requests for TPDES Permit No. WQ0016434001 was filed with the Texas Commission on Environmental Quality's Office of the Chief Clerk, and a copy was served to all persons listed on the attached mailing list via hand delivery, electronic delivery, inter-agency mail, or by deposit in the U.S. Mail.

*Bradford S Eckhart*

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Bradford Eckhart, *Staff Attorney*  
State Bar No. 24137368

MAILING LIST

Caddo Mills Laguna Land Azure, LLC  
TCEQ Docket No./TCEQ Expediente N.º 2024-1813-MWD;  
TPDES Permit No./TPDES Permiso N.º WQ0016434001

FOR THE APPLICANT/PARA EL  
SOLICITANTE

Zach Ipour, Co-President  
Caddo Mills Laguna Land Azure, LLC  
2101 Cedar Springs Road, Suite 700  
Dallas, Texas 75201

Laura Preston, P.E. & Meredith McCall, P.E.  
LJA Engineering, Inc.  
6060 North Central Expressway, Suite 400  
Dallas, Texas 75206

REQUESTER(S) SOLICITANTE(S)

Steven Dickman  
6005 Up Valley Run  
Austin, Texas 78731

FOR THE EXECUTIVE DIRECTOR/PARA  
EL DIRECTOR EJECUTIVO

via electronic mail/vía correo  
electrónico:

Bradford Eckhart, Staff Attorney  
Texas Commission on  
Environmental Quality  
Environmental Law Division, MC-173  
P.O. Box 13087  
Austin, Texas 78711

Sujata Sinha, Technical Staff  
Texas Commission on  
Environmental Quality  
Water Quality Division, MC-148  
P.O. Box 13087  
Austin, Texas 78711

Ryan Vise, Deputy Director  
Texas Commission on  
Environmental Quality  
External Relations Division  
Public Education Program, MC-108  
P.O. Box 13087  
Austin, Texas 78711

FOR PUBLIC INTEREST COUNSEL/PARA  
ABOGADOS DE INTERÉS PÚBLICO

via electronic mail/vía correo electrónico:

Garrett T. Arthur, Attorney  
Texas Commission on  
Environmental Quality  
Public Interest Counsel, MC-103  
P.O. Box 13087  
Austin, Texas 78711

FOR ALTERNATIVE DISPUTE  
RESOLUTION/PARA LA RESOLUCIÓN  
ALTERNATIVA DE DISPUTAS

via electronic mail/vía correo electrónico:

Kyle Lucas  
Texas Commission on  
Environmental Quality  
Alternative Dispute Resolution, MC-222  
P.O. Box 13087  
Austin, Texas 78711

FOR THE CHIEF CLERK/PARA EL  
SECRETARIO OFICIAL

via eFilings:

Docket Clerk  
Texas Commission on  
Environmental Quality  
Office of Chief Clerk, MC-105  
P.O. Box 13087  
Austin, Texas 78711

<https://www.tceq.texas.gov/goto/efilings>

# Attachment A



# Caddo Mills Laguna Land Azure, LLC

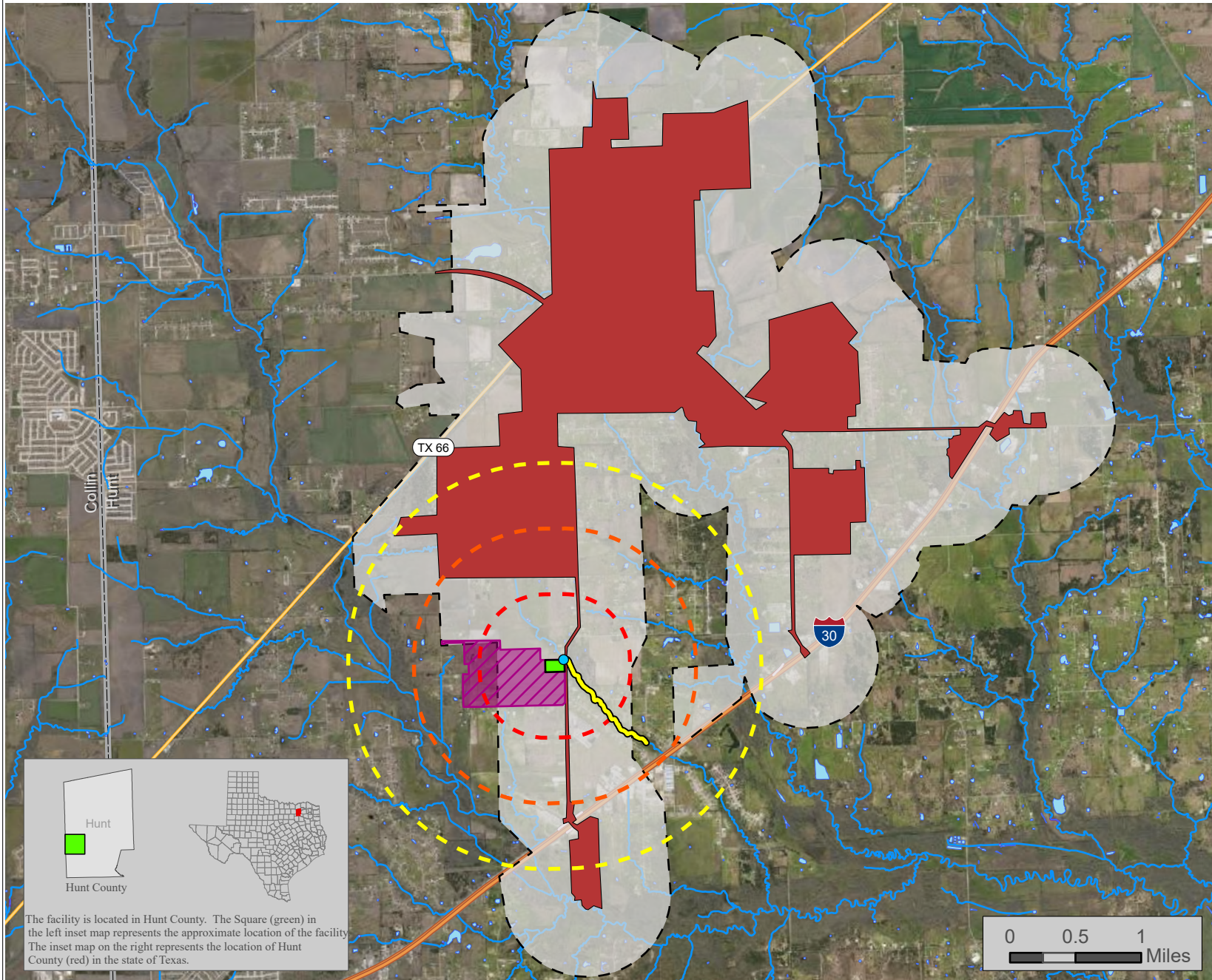
## Mykonos Wastewater Treatment Facility

Map Requested by TCEQ Office of Legal Services  
for Commissioners' Agenda

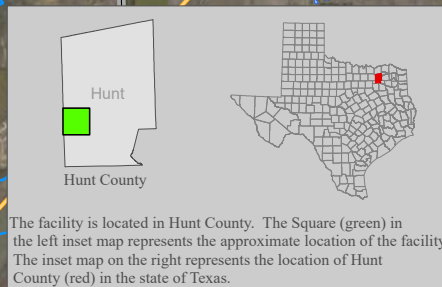


*Protecting Texas by  
Reducing and  
Preventing Pollution*

Texas Commission on Environmental Quality  
GIS Team (Mail Code 197)  
P.O. Box 13087  
Austin, Texas 78711-3087  
Date: 10/31/2024  
CRF 0113630\_1  
Cartographer: RKukushk



- Facility Boundary
- Service Area Boundary
- Outfall
- Discharge Route
- 1.5 miles
- 1 mile
- 0.5 miles
- Caddo Mills City Limits
- Caddo Mills ETJ
- Lake/Pond
- Reservoir
- Interstate
- Highway
- Intermediate Roads
- Stream/River
- Artificial Path
- County Boundary



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

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.