

September 29, 2025

Chief Clerk of TCEQ,
Re: Permit WQ0016411001
TCEQ Executive Director,
Caleb Shook, Abdur Rahim, Ryan Vise
Public Interest Counsel, Ed Martinez, Garret T. Arthur,
Attorney Applicant, Robert Teeter BL374 LLC, Meg Pierce-Walsh, Jorge
Gonzalez-Rodiles,
Alternative Dispute Resolution, Kyle Lucas

I, Teri Berbel, was omitted from the group the commission (OPIC) stated received timely comments hearing request and request for reconsideration (page one of docket number 2025–0906 – MWD).

Additionally, in the same document, my name is omitted as “residing in close proximity.” TCEQ has on record that my dwelling is next to 7501 Bent Trail dwelling (which they did include as close proximity). OPIC contradicts itself when it says on page 9 that I do not live in close proximity. However, I failed to “articulate a personal justiciable interest.” When I stated my concern about erosion, it affects my bridge on Bent Trail and is the same concern as the house next door geographically along with 10 other households in our neighborhood and our Bent Trail Homeowners Association. I will be directly effected by erosion and flooding due to the only access to my home being over the creek that will be adversely effected, impeding my ability to access care in emergencies, receive assistance in case of fire, and go to work and buy essentials.

OPIC fails to acknowledge my geographical address and instead eliminates on the third person description instead of a first person description.

I request a reconsideration only after OPIC addresses this mistake, correct it and communicate this to all parties.

Sincerely,
Teri Berbel

DATE: September 29, 2025; Time 10.30 AM

TO: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Chief Clerk of the TCEQ

RE: Docket No. 2025-0906-MWD
Request(s) filed on TPDES Permit No. WQ0016411001

My name is Truman Goodman, residing at 7481 Bent Trail, Mansfield, TX 76063, phone number 817-563-1291. I live within a half mile of the proposed sewage plant. The North West corner of my property is within a few hundred feet of the un-named tributary's path of flow resulting from the sewage plants discharge to open ground. What the applicant is calling a tributary is a slight depression in the land cause by erosion from normal rainfall. Due to this close proximity, I will be adversely affected by the odor, plant noise, trucking activity while enjoying outdoor activities such as landscape/mowing, gardening, swimming, outdoor cooking and enjoying the peace and quiet of country life as I have for twenty-four years.

The tributary is proposed to discharge into a creek running through our neighborhood. I, along with many neighbors, walk our road for exercise daily, crossing the creek many times. I along with other exercisers will be adversely affected from the odor coming from the discharge into the creek. More importantly, when we have heavy rains, 4 to 6 times per year, the creek overflows the banks and road to depth of 12 to 18 inches. Leaving behind large limbs and other debris in the roadway that has to be cleared to allow traffic flow. Adding the proposed daily discharge from the sewage plant of just under a half million gallons per day will greatly exacerbate the flooding problem, sending contaminated waters higher onto neighbor's property. My home is to the east of the creek where it passes under the road. I am required to cross the creek every time I leave or return to my home.

I previously submitted timely comments and requested a contested case hearing. I am an Affected Person with personal justiciable interest as stated above.

Best Regards,

Truman Goodman
7481 Bent Trail
Mansfield, TX 76063

From: rangran@att.net
To: [PUBCOMMENT-OCC](#)
Subject: Public comment on Permit Number WQ0016411001
Date: Monday, September 29, 2025 8:48:17 PM

REGULATED ENTY NAME TARRANT COUNTY MUD NO 2 WWTF

RN NUMBER: RN111810032

PERMIT NUMBER: WQ0016411001

DOCKET NUMBER: 2025-0906-MWD

COUNTY: TARRANT

PRINCIPAL NAME: BL 374 LLC

CN NUMBER: CN606181915

NAME: Ranier Granberry

EMAIL: rangran@att.net

COMPANY:

ADDRESS: 10517 Hackamore Cir.
Mansfield, TX 76063

PHONE: 8179667775

FAX:

COMMENTS: From Ranier Granberry /10517 Hackamore Cir. Mansfield, TX 76063/817.966.7775/Sept. 29, 2025, 3:30 p.m. We are strongly opposed to the proposed Gibson Water Treatment Plant. Our property is located .68 miles NNW of the site, and prevailing winds are S/SSE during the preponderance of the year, which means that odors and particulates have a significant chance of being spread toward our (and our neighbors') properties. In addition, local farms and ecosystems are also at risk, not just from airborne compounds and particulates, but also from leachate and other surface and groundwater contamination. The access to the plant is a two-lane blacktop road without shoulder, and is populated by single-family residences and farms. The road was never intended for consistent commercial/industrial trucks, and would require significant improvements to ensure the viability of the road with the addition of heavy truck traffic. The current infrastructure is adequate to support systems now in place, but the flooding remediation, road maintenance, and monitoring concerns of the effluent and outflow have not been demonstrated to support the project. An analysis of similar projects in similar communities/enviornments places them within the definition of "nuisance" projects, creating adverse effects on existing homesteads, communities, and wildlife ecosystems in terms of human health, declining property values, and business degradation/disruption. These are just immediate to mid-term consequences and do not address long-term negative impacts from this proposed facility.

www.tceq.texas.gov/goto/efilings

Chief Clerk of TCEQ,

Re: Permit WQ0016411001

TCEQ Executive Director,

Caleb Shook, Abdur Rahim, Ryan Vise

Public Interest Counsel, Ed Martinez, Garrett T. Arthur,

Attorney Applicant, Robert Teeter BL374 LLC, Meg Pierce-Walsh, Jorge Gonzalez-Rodiles,

Alternative Dispute Resolution, Kyle Lucas

The Executive Director's Response to Public Comment (undated) states the Office of the Chief Clerk received timely comments and hearing requests from both Jan and Roger Hurlbut.

On 9/23/24 at 7:00 pm, I submitted my request for a contested public hearing as well as my personal comments and concerns, which were subsequently addressed by the ED in such Response under Comments 3, 18, 20, 23 and 25.

Additionally, the Executive Director's Response to Hearing Requests, dated 9/15/25, states the ED received a timely contested case hearing request from me. However, on page 10 it states I failed to submit timely comments. To the contrary, I submitted timely comments 4/10/24 5:25 PM and oral comments 9/23/24 7:00 PM.

I provided graphic information in my 4/10/24 comments regarding how erosion, debris, and flooding over my bridge will adversely affect my health and safety. I drive over the bridge every day, sometimes repeatedly, as it is the only way to exit my street, which is a cul-de-sac, get to my house, get medication, see my treating doctors, assist ill family members, as well as obtain food and life sustaining supplies. Additionally, my written comments about Oncor's ability to repair or restore our electricity to our home (we are totally electric) on its utility easements would be inaccessible along the creek and bridge, preventing it repair trucks and crew coming in to restore our power. Many times, my husband I have experienced frequent or prolonged periods of outage. Again, this affects me, my husband and family both physically and mentally. TCEQ has documented and mapped the exact geographical location of this bridge to my dwelling.

On 9/23/24, I gave comments about my concern that modeling failed to address a large church and its property which is within a mile or so of the discharge point, in which the wastewater will dumped into all three of their lakes, which are filled by and connected to the discharge route.

Those lakes are used consistently and regularly for recreational and aquatic uses (including fishing, boating and/or swimming) by the church members, guests and youth groups. Because the modeling failed to consider this important and adversely affected group of people and such property (which were known or ascertainable by the applicant and TCEQ) the justification, approval and credibility of the modeling used is too faulty and deficient to permit the sewage plant. I therefore have developed distress and anxiety about other faulty premises on the accuracy of TCEQ's model for my property which is in closer proximity to the sewage plant

There was no *specific* antidegradation review by TCEQ of such obvious receiving waters or their existing or anticipated uses.

Finally, the Executive Director has data on record that Roger Hurlbut and Jan Hurlbut are married and reside at the same address. You already have his timely made comments, which *also* specifically reference me, his wife and our family as well as our personal and outdoor activities and the adverse effects on us and our family. That information is fully part of the "data" which TCEQ already has and is fully aware of it also pertains to the adverse effects from this sewage plant will have on me personally.

Importantly, any rationalization for accepting my husband, Roger Hurlbut as an affected person, but not me, his wife, who has lives with him in the same house for over 25 years and would experience the same adverse effects is inconsistent. You are asked to look at the "data" TCEQ has from my husband as it also directly relates to my standing, also. See reg. Section 55.203(d)

I request that the ED reconsider my request for reconsideration and contested case hearing after addressing and correcting these consequential inconsistencies.

Regards,

Jan Hurlbut

**Reply to Responses to Hearing Requests & Requests for Reconsideration and
Objection to TCEQ Jurisdiction**

Permit No: WQ0016411001
Docket No: 2025-0906-MWD
Applicant: BL 374 LLC, CN606181915
TPDES Permit: No. WQ001641101
Regulated Entity: Tarrant County MUD

In my prior comments, I mentioned that the creek is at risk of flooding/erosion, etc. due to the volume of resulting water from the sewage discharge. I also complained of the lack of any onsite investigation by TCEQ to determine existing uses, etc.. The following further addresses those concerns.

First, the proposed discharge volume of some 200,000 – 490,000 gallons will not be dumped into a defined water course, but instead into a diffused drainage area for storm water runoff. Upon discharge the wastewater will generally drain as a sheet flow, traveling a long way before it meets up with Willow Creek which then flows under our neighborhood bridge. It will also have eroded or flooded yards/areas that do not ordinarily receive or channel water.

Second, before the discharge route meets Willow Creek it will not have traveled within be defined channel with a bed or banks, ordinary flow or high water marks. Instead, whether in whole or in segments, it is essentially or in large measure a drainage area or mere water shed. It is an undefined dry or depressed drainage area on privately owned land. At such point, it does not appear as creek or water course.

The TCEQ has incorrectly assumed that the Applicant's discharge point is into waters of the state, when, in fact, it appears to be nothing more than a depressed drainage area. While calling it "unnamed tributary," TCEQ admittedly conducted no on-site investigation to see if the discharge was actually into a fully defined water course.

The proposed outfall or discharge point for the sewage plant's wastewater does not discharge the wastewater into the waters of the state. It does not discharge into or follow an established or consistent water course. Instead, the so-called tributary relied upon in the permit is not a creek, per se. Rather it consists of some low spots for water shedding or drainage.

As such, the subject wastewater discharge would be onto private property and should be treated as a dry land application, for which TCEQ has no authority/jurisdiction to grant a permit. It would invade private property, which the Applicant does not own and has not otherwise acquired.

Respectfully,

Roger L. Hurlbut
7501 Bent Trail,
Mansfield, Texas 76063
(817) 201-9732

Filed this day, with Chief Clerk of TCEQ at www.tceq.texas.gov/goto/efilings;
Copies sent to Executive Director, Public Interest Counsel and Applicant by email.
Copies sent to other requestors by email or by mail.

From:

Patrick Seth Lewis
7370 Sunflower Creek DR
Mansfield, TX 76063

To:

Texas Commission on Environmental Quality
Office of the Chief Clerk (MC-105)
P.O. Box 13087
Austin, Texas 78711-3087

Dated: 2025-09-29

Re: In the Matter of the Application by BL 374 LLC for TPDES Permit No. WQ0016411001, TCEQ Docket No. 2025-0960-MWD

I. Introduction

I respectfully submit this response to the Commission's denial of my request for a contested case hearing. My name is Patrick Seth Lewis, and I reside at 7370 Sunflower Creek Drive, Mansfield, Texas 76063, which is located approximately 2,000 feet from the proposed wastewater treatment plant and discharge point, and approximately 280 feet from the drainage area into which the effluent will flow.

Pursuant to Texas Water Code § 5.115 and 30 TAC § 55.203, I qualify as an affected person because I have a personal justiciable interest in the outcome of this permit application that is not common to the general public. The Office of Public Interest Counsel (OPIC), in its September 15, 2025 Response, reached the same conclusion and expressly recommended that I be recognized as an affected party and granted a hearing.

II. Statutory Framework

Under 30 TAC § 55.203(a), 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. The Commission considers factors including:

- Proximity to the proposed facility and outfall,
- Relationship of the interest to the regulated activity,

- Likely impacts on health, safety, property use, and natural resources, and
- Whether the interest is distinct from the general public.

Hearing requests must be based on timely comments (30 TAC § 55.201(c)) and must raise issues that are relevant and material to the Commission's decision (30 TAC § 55.211(c)(2)(A)(ii)).

III. Application to My Circumstances

A. Proximity and Family Impact

My family and I live within 2,000 feet of the proposed plant and discharge point, and only 280 feet from the drainage channel where effluent will flow. We have young children who play outside daily. We rely on clean air, safe water, and a healthy environment for our quality of life. The proposed plant raises concerns for:

- Air Quality and Odors: Activated sludge treatment and chlorine disinfection often create nuisance odors that would directly affect our outdoor use and enjoyment of our home.
- Water Quality and Health: Effluent discharge risks nutrient overload, algal blooms, bacteria, and PFAS contamination in the receiving waters leading to Joe Pool Lake (Segment 0838, which is designated for public water supply, recreation, and aquatic life use).
- Property and Safety: Flooding, erosion, and degradation of the drainage channel threaten not just property values but the physical safety and stability of nearby homes, including mine.

These are personal impacts unique to my family, not general concerns shared equally by the public.

B. Failure to Study the Effluent Flow Path

Neither the Applicant nor TCEQ staff has physically walked the proposed effluent flow path. Instead, they relied on maps and labeled the feature as a "creek." In reality, this is not a creek but a low-lying drainage area that only carries water during rainfall events.

- Surrounding properties, including mine, already experience flooding during rain.
- Continuous effluent flow will worsen flooding and erosion, destabilizing the channel.
- The Applicant's design team confirmed they have not conducted any field inspection or accounted for these conditions.

This deficiency raises significant concerns under 30 TAC § 309.12 (site and discharge route suitability). It also falls squarely within OPIC's Disputed Issue No. 7 ("whether the draft permit depicts a suitable discharge route"). Without a physical study, the draft permit cannot ensure protection of water quality as required by 30 TAC § 307.1.

C. Combined Effects of Effluent and Stormwater Runoff

The proposed development itself will dramatically increase stormwater runoff once the property is paved with concrete and asphalt. This runoff will likely flow into the same drainage channel designated for effluent discharge.

- The channel is already inadequate during rainfall events.
- Combined effluent and stormwater flows will exceed its capacity.
- This will intensify erosion, sediment transport, and pollutant loading, degrading water quality downstream in Willow Branch, Walnut Creek, and Joe Pool Lake.

This concern directly relates to discharge suitability under 30 TAC § 309.12 and the requirement to protect designated uses under 30 TAC Chapter 307.

IV. Reliance on OPIC's Recommendation

The Office of Public Interest Counsel explicitly recommended that the Commission find me to be an affected person and grant my hearing request. OPIC found that:

- My proximity to the discharge route creates a reasonable connection between my interests and the regulated activity,
- The risks to health, safety, property, and natural resources are increased by my proximity, and
- My interests are distinct from the general public.

I fully adopt and rely upon OPIC's reasoning and respectfully urge the Commission to follow OPIC's recommendation.

V. Request for Relief

For the reasons stated above, I respectfully request that the Commission:

1. Find that I qualify as an affected person under Texas Water Code § 5.115 and 30 TAC § 55.203;
2. Grant my hearing request and refer this matter to the State Office of Administrative Hearings (SOAH) for a contested case hearing; and
3. Ensure that the disputed issues identified by OPIC (Nos. 1–11) — including

suitability of the discharge route, water quality impacts, and adequacy of the draft permit — are fully considered during the hearing.

VI. Rebuttal to Applicant's Claims

The Applicant asserts that no requestors, including myself, qualify as “affected persons.” This assertion is incorrect under 30 TAC §§ 55.201–55.203. My property is approximately 2,000 feet from the proposed plant and discharge point, and only about 280 feet from the drainage route that will carry effluent and stormwater runoff. My family, including young children, regularly uses our yard and surrounding areas for recreation, placing us at direct risk from odors, degraded air quality, and runoff. The drainage feature identified as a “creek” is in fact an unclassified low-lying area that already floods onto private property during rainfall events, and additional effluent and stormwater runoff will exacerbate both flooding and erosion, directly impacting my land. These facts establish a personal justiciable interest not common to the general public, satisfying the standard in 30 TAC § 55.203(c)(4)–(5). The Applicant’s attempt to dismiss my standing is therefore unfounded.

VII. Conclusion

The law and the record clearly establish my standing as an affected person. The Applicant has not adequately demonstrated that the proposed discharge route is suitable or that the draft permit will protect water quality. A contested case hearing is necessary to evaluate these significant, unresolved issues.

Respectfully submitted,

Patrick Seth Lewis
7370 Sunflower Creek Drive
Mansfield, TX 76063
817-905-9054
sethlew37@gmail.com

Daren & Kerry Smith
7470 Bent Trail Mansfield, TX 76063

Cell: 214-892-9961
Email: dkj7470@gmail.com

0.52 Miles from Outfall 001

Firstly, I would like to address the applicant and the executive director's response and TCEQ that I am not an affected person. I have stated on numerous occasions in my submissions that the creek runs the full length of my property, approximately 200ft away from my house, this alone makes me and my family affected. I have also stated many times the effects on my family this will have. I have explained our interactions with the creek and its relevant issues when it floods, this also makes us highly affected by this proposed treatment plant. I have listed below my previous concerns for reconsideration.

I have great concerns over my family's human health when the creek floods over into my yard E. coli and other pathogens will be left on the sod transferred to our footwear and ultimately end up in our house. This will also transfer into vehicles and be spread by pets.

I have concerns that this will also affect our recreational use of our yard swimming pool, my son's climbing frame and swingset, odors emanating from the discharge route and plant will seriously affect our family, gatherings, entertaining and barbecues.

I fear for our human health as well, as we will be exposed to lots of pathogens when we have to get into the creek to make essential maintenance to the rip wrap, stone and cutting down the banks that our HOA makes us maintain. I do not think that the proposed discharge route is adequate at all its simply a small depression in the ground and not a creek at all. This has not been inspected by anyone if they had, they would real realize it's totally inadequate, in the summer when it's dry the discharge will be highly concentrated as there is no additional water to carry or dilute the effluent downstream or away, potentially leading to nutrient overload and algae blooms.

I have concerns that my water well that is only 75 feet away from the creek will become contaminated if this happens, contaminated water will be spread all over our yard when I irrigate in the summer. I have faucets connected to this and my swimming pool is automatically topped up from the well.

My family has issues with the modeling that has been used in this application. Firstly the discharge route is bone dry 6 to 7 months of the year so any discharge that ends up in the creek will increase the amount of water, especially in times of seasonal flooding. We were told at the public meeting, no additional water would end up in the creek which is absolutely ludicrous because 490,000 gallons of waste water would be coming down every day. This equates to a 4 inch pipe going full bore 24hrs a day 7 days a week.

I don't think that the applicant or TCEQ has adequately considered the regionalization of the application as we know that city sewer is available to pipe into approximately 1 mile from the proposed site. This would also negate the need for sludge removal, having to be hauled away every week.

Overall, this would have a profound effect on my family to our health and safety and the use of our property. This is my official response to all parties.

Finally I would like to re-iterate that I request a contested case hearing.

Kind regards,

Daren Smith.



Application By BL 374 LLC For TPDES Permit No. WQ0016411001 TCEQ Docket No. 2025-0906-MWD

Paul Smith

Date: 28th of September 2025

Address: 7457 Bent Trail Mansfield, TX 76063

Cell number: 469-350-4014

Email: pljc22@gmail.com

Located 0.49 miles away from Outfall 001.

My property is located directly in the path of the proposed discharge route.
I would be directly affected by the sewage plant outflow.

PLEASE NOTE:

There is no creek or tributary to the rear of my land boundary or where it enters my property after the boundary. It is an ephemeral stream, only containing water after precipitation.

No on-site survey of my land or this ephemeral stream has ever been conducted by the Applicant or TCEQ or any Independent Survey Company at any time.

This means that those parties are unaware of the fact that there is no creek, creek bed or tributary that has banks or retains any kind of water other than natural drainage immediately after precipitation existing on the land to the rear of my property and on my neighbors land at the rear of my property.

THIS IS THE PROPOSED DISCHARGE ROUTE!

Aerial surveys or satellite imaging will not show an accurate depiction of this ephemeral stream as the dense trees and foliage hide the view of the terrain. Only an on ground, physical inspection would give an accurate topographical survey.

Therefore this cannot be classified as "Waters Of The State" in any legal classification and as such TCEQ has no jurisdictional rights over my land.

Therefore, I DO NOT give permission for ANY discharge from the proposed plant to cross my land.

The following are to be read in conjunction with my previously submitted comments and photographs of:

04/23/2024 6:43pm
06/06/2024 10:24pm
09/23/2024 2:48pm
09/23/2024 3:02pm
09/23/2024 5:01pm
09/23/2024 7:00pm
05/03/2025 2:33pm

1. The “unnamed tributary” enters my property at the rear boundary. IT IS NOT A CREEK OR WATER COURSE. These are two different segments. It runs to and intersects with Willow creek approximately halfway across my yard. Willow Creek floods on a regular basis directly onto my yard up to 100 feet on all sides. This is a regular yearly occurrence, ranging from 4-10 times annually depending on rainfall. This means that the majority of my yard would become unusable after heavy rain due to contaminants (including E-Coli as stated in the Applicants initial application) being spread in the flood waters onto my yard and surrounding areas.
1. Part of Bent Trail H.O.A. Bylaws state that I must maintain my Lot/yard or face breach penalties etc. In order to comply, Willow Creek must be maintained regularly. This includes washout repaired, washed down debris/blockages removed, plants and grass cut/trimmed, RipRap reinstated etc. This can ONLY be achieved by ENTERING the creek. This in turn would expose myself and my sons or anyone else I hire to carry out this maintenance that I am LEGALLY OBLIGATED to do.
1. I am very concerned that my well that is located only 110 feet away from the Willow Creek flood plain will be adversely affected and contaminated by the discharge and contaminants contained within. This will severely affect the water quality from the well and contaminate the surface water. My well feeds my Lawn irrigation system and the faucets in my yard and cookout and the soaker system to the perimeter of my property. This could lead to myself, guests, and grandchildren, being DIRECTLY contaminated through handwashing and walking through my irrigated yard. This goes completely against TCEQ guidelines for protecting the ground and surface water, which would subsequently endanger human health and safety.

1. As stated in previously submitted comments, the whole of my land is used for recreational purposes and activities, including the ephemeral stream and Willow Creek. This is the reason we purchased this property at this location. We like to spend quality family time with our friends and visitors, enjoying the outdoors together. We own a golf cart, an ATV, a UTV, a Tractor and a mower that are all used in the vicinity or come into direct contact with the ephemeral stream and Willow Creek.

1. I have 2 dogs. Naturally they exercise and play in my yard. This includes entering the creek. They will come into contact with the discharge from the proposed plant. This would contaminate them and cause possible health issues and in turn transfer contaminate to us and my home.

1. No on-site survey has been conducted to assess the damage/effect on wildlife we have that uses Willow Creek or the ephemeral stream and surrounding land?

In conclusion, this outfall discharge route is not adequate for the requirements of this volume of effluent. Any discharge would become highly concentrated in dry periods without rainfall.

It will be damaging and harmful to the surrounding area and water quality.

Human health will ultimately be negatively affected.

My family's recreational use of our own property will be severely diminished and possibly destroyed.

Plant and animal life including both pets and wildlife will be detrimentally affected by the effluent discharge and volume.

To reiterate: I request that you grant a Contested Case Hearing In The Matter Of The Application By BL 374 LLC For TPDES Permit No. WQ0016411001 TCEQ Docket No. 2025-0906-MWD

Please include myself and my wife Leanne Smith as "affected persons".

I think I have clearly shown that I/we have personal justiciable interest and must be added to the affected persons list.

Regards,
Paul Smith

From: jjwatkins67@gmail.com
To: [PUBCOMMENT-OCC](#)
Subject: Public comment on Permit Number WQ0016411001
Date: Monday, September 29, 2025 8:44:57 PM

REGULATED ENTY NAME TARRANT COUNTY MUD NO 2 WWTF

RN NUMBER: RN111810032

PERMIT NUMBER: WQ0016411001

DOCKET NUMBER: 2025-0906-MWD

COUNTY: TARRANT

PRINCIPAL NAME: BL 374 LLC

CN NUMBER: CN606181915

NAME: John Watkins

EMAIL: jjwatkins67@gmail.com

COMPANY:

ADDRESS: 10525 Hackamore Cir
Mansfield, TX 76063

PHONE: 8174565571

FAX:

COMMENTS: Please consider the following comment regarding the sewage treatment plant. This plant has been determined by many Mansfield residents as an environmental hazard and safety concern for residents, park goers and wildlife. The nuisance conditions, including odor, volume and quality could pose a direct health hazard to humans, dogs and aquatic life, as it isn't a suitable discharge route.