

September 12, 2025

Ms. Laurie Gharis
Chief Clerk, MC-105
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: Request for Contested Case Hearing and Comments on proposed Texas Commission on Environmental Quality ("TCEQ") TPDES Permit No. WQ0015738001, Plum Creek Caldwell, L.P. ("Applicant")

Dear Ms. Gharis,

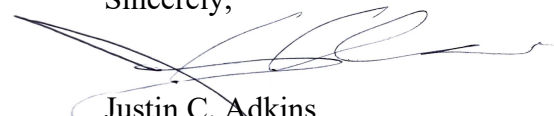
On March 15, 2024, the Guadalupe-Blanco River Authority ("GBRA") timely filed comments and its request for a contested case hearing pertaining to Plum Creek Caldwell's pending application for a major amendment of existing TPDES permit No. WQ0015738001. In addition to regionalization concerns, GBRA expressed concern that the proposed permit effluent limits in the application, particularly the lack of a Total Phosphorous ("TP") limit for all phases, would not sufficiently protect water quality in the area of the proposed discharge.

Following discussions regarding the application's lack of a proposed TP limit, GBRA and Applicant have come to an agreement regarding the addition of a daily average TP limit of 1.0 mg/L for all phases. Applicant has represented to GBRA that it will request that the TCEQ add this limit to the permit. GBRA respectfully requests confirmation of this addition and a copy of the draft permit showing that the proposed permit will contain the one mg/l TP limit.

In light of GBRA's and Applicant's agreement, GBRA's concerns regarding the proposed permit amendment have been addressed. Therefore, GBRA respectfully withdraws its comments and request for a contested case hearing relating to this proposed amendment.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin C. Adkins", is written over a circular blue ink stamp.

Justin C. Adkins
Assistant General Counsel
Guadalupe-Blanco River Authority

