



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 19, 2025

TO: All interested persons.

RE: City of Liberty Hill
TPDES Permit No. WQ0015000001

Decision of the Executive Director.

The executive director has made a decision that the above-referenced permit application meets the requirements of applicable law. **This decision does not authorize construction or operation of any proposed facilities.** This decision will be considered by the commissioners at a regularly scheduled public meeting before any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting.

Enclosed with this letter are instructions to view the Executive Director's Response to Public Comment (RTC) on the Internet. Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov. A complete copy of the RTC (including the mailing list), complete application, draft permit and related documents, including public comments, are available for review at the TCEQ Central Office. Additionally, a copy of the complete application, the draft permit, and executive director's preliminary decision are available for viewing and copying at Liberty Hill Public Library, 355 Loop 332, Liberty Hill, Texas.

If you disagree with the executive director's decision, and you believe you are an "affected person" as defined below, you may request a contested case hearing. In addition, anyone may request reconsideration of the executive director's decision. The procedures for the commission's evaluation of hearing requests/requests for reconsideration are located in 30 Texas Administrative Code Chapter 55, Subchapter F. A brief description of the procedures for these two requests follows.

How to Request a Contested Case Hearing.

It is important that your request include all the information that supports your right to a contested case hearing. Your hearing request must demonstrate that you meet the applicable legal requirements to have your hearing request granted. The commission's consideration of your request will be based on the information you provide.

The request must include the following:

- (1) Your name, address, daytime telephone number, and, if possible, a fax number.

- (2) The name of the applicant, the permit number and other numbers listed above so that your request may be processed properly.
- (3) A statement clearly expressing that you are requesting a contested case hearing. For example, the following statement would be sufficient: "I request a contested case hearing."
- (4) If the request is made by a group or association, the request must identify:
 - (A) one person by name, address, daytime telephone number, and, if possible, the fax number, of the person who will be responsible for receiving all communications and documents for the group;
 - (B) the comments on the application submitted by the group that are the basis of the hearing request; and
 - (C) by name and physical address one or more members of the group that would otherwise have standing to request a hearing in their own right. The interests the group seeks to protect must relate to the organization's purpose. Neither the claim asserted nor the relief requested must require the participation of the individual members in the case.

Additionally, your request must demonstrate that you are an **"affected person."** 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. Your request must describe how and why you would be adversely affected by the proposed facility or activity in a manner not common to the general public. For example, to the extent your request is based on these concerns, you should describe the likely impact on your health, safety, or uses of your property which may be adversely affected by the proposed facility or activities. To demonstrate that you have a personal justiciable interest, you must state, as specifically as you are able, your location and the distance between your location and the proposed facility or activities.

Your request must raise disputed issues of fact that are relevant and material to the commission's decision on this application that were raised **by you** during the public comment period. The request cannot be based solely on issues raised in comments that you have withdrawn.

To facilitate the commission's determination of the number and scope of issues to be referred to hearing, you should: 1) specify any of the executive director's responses to **your** comments that you dispute; 2) the factual basis of the dispute; and 3) list any disputed issues of law.

How to Request Reconsideration of the Executive Director's Decision.

Unlike a request for a contested case hearing, anyone may request reconsideration of the executive director's decision. A request for reconsideration should contain your name, address, daytime phone number, and, if possible, your fax number. The request must state that you are requesting reconsideration of the executive director's decision, and must explain why you believe the decision should be reconsidered.

Deadline for Submitting Requests.

A request for a contested case hearing or reconsideration of the executive director's decision must be **received by** the Chief Clerk's office no later than **30 calendar days** after the date

of this letter. You may submit your request electronically at www.tceq.texas.gov/agency/decisions/cc/comments.html or by mail to the following address:

Laurie Gharis, Chief Clerk
TCEQ, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

Processing of Requests.

Timely requests for a contested case hearing or for reconsideration of the executive director's decision will be referred to the TCEQ's Alternative Dispute Resolution Program and set on the agenda of one of the commission's regularly scheduled meetings. Additional instructions explaining these procedures will be sent to the attached mailing list when this meeting has been scheduled.

How to Obtain Additional Information.

If you have any questions or need additional information about the procedures described in this letter, please call the Public Education Program, toll free, at 1-800-687-4040.

Sincerely,

A handwritten signature in black ink that reads "Laurie Gharis". The signature is written in a cursive, flowing style.

Laurie Gharis
Chief Clerk

LG/vr

Enclosure

**EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT
for**

City of Liberty Hill
TPDES Permit No. WQ0015000001

The Executive Director has made the Response to Public Comment (RTC) for the application by City of Liberty Hill for TPDES Permit No. WQ0015000001 available for viewing on the Internet. You may view and print the document by visiting the TCEQ Commissioners' Integrated Database at the following link:

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

In order to view the RTC at the link above, enter the TCEQ ID Number for this application (WQ0015000001) and click the "Search" button. The search results will display a link to the RTC.

Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov.

Additional Information

For more information on the public participation process, you may contact the Office of the Public Interest Counsel at (512) 239-6363 or call the Public Education Program, toll free, at (800) 687-4040.

A complete copy of the RTC (including the mailing list), the complete application, the draft permit, and related documents, including comments, are available for review at the TCEQ Central Office in Austin, Texas. Additionally, a copy of the complete application, the draft permit, and executive director's preliminary decision are available for viewing and copying at Liberty Hill Public Library, 355 Loop 332, Liberty Hill, Texas.

MAILING LIST
for
City of Liberty Hill
TPDES Permit No. WQ0015000001

FOR THE APPLICANT:

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Aaron Laughlin, P.E., Project Manager
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INTERESTED PERSONS:

See attached list

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via electronic mail:

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FOR THE CHIEF CLERK
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LIBERTY HILL TX 78642-2509

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521 GERONA CT
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BOOK, KEVIN & WHITFIELD,TANIS
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BOYANAPALLY , NITHESH RAO
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BOYER , DAVID & VICTORIA
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BOYER , DAVID
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CARMON , JEFFREY
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205 MIRA MESA DR
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DORSA , KATHY & KEITH
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DOWD , NIKKI
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DWIGHT , MEGAN
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FLORENCE , LOUISE
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GANJI , SURENDER
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424 PALATINO BND
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GUDUR , LAXMAN SANDEEP
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HIRAY , SWAPNA
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KRISHNAN , SATISH
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LIBERTY HILL TX 78642-2297

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107 FORTUNA CT
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LAMKIN , MATTHEW
112 BANYON DR
LIBERTY HILL TX 78642-2539

LATZ , RONALD
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LAWSON , BENJAMIN
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LE , CHARLES
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LIBERTY HILL TX 78642-2617

LE , TASHA
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LIBERTY HILL TX 78642-2742

MADDIKERA , PHANI BHUSHAN R
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MADDURI , CHANDRA SEKHAR REDDY
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MAGRUDER , SHAUN
236 ROSETTA LOOP
LIBERTY HILL TX 78642-2594

MAILE , MR NAGESHBABU
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645 PICKRELL LOOP
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LIBERTY HILL TX 78642-2247

MARTIN , MRS DEANNA B
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713 FAITH DR
LIBERTY HILL TX 78642-2247

MARTIN , NATASHA J
GRAVES DOUGHERTY HEARON & MOODY PC
STE 2700
401 CONGRESS AVE
AUSTIN TX 78701-4071

MARTIN , DAVID
713 FAITH DR
LIBERTY HILL TX 78642-2247

MARTINEZ , CHRISTINE M
520 MONROVIA CT
LIBERTY HILL TX 78642-2504

MASSEY , BRIAN
3701 COUNTY ROAD 258
LIBERTY HILL TX 78642-4751

MASSEY , BRIAN & CARA
3701 COUNTY ROAD 258
LIBERTY HILL TX 78642-4751

MASSEY , CARA
3701 COUNTY ROAD 258
LIBERTY HILL TX 78642-4751

MATHUR CHANDRASEKARAN , MR GOWRI
SHANKAR
248 CANYONCREST WAY
LIBERTY HILL TX 78642-2618

MATIAS , FERNANDO
416 BEREAN LN
LIBERTY HILL TX 78642-2584

MATTAPALLY , SAI CHAND
504 BELL CHIME CV
LIBERTY HILL TX 78642-2621

MCDEVITT , PATRICK
632 HALLWOOD DR
LIBERTY HILL TX 78642-2492

MCPHEETERS , PAUL
300 OAKLEY PASS
LIBERTY HILL TX 78642-2490

MEDA , UPENDER
204 VALLETTA WAY
LIBERTY HILL TX 78642-2553

MEDAVARAPU , KRISHNA
812 OLINDA WAY
LIBERTY HILL TX 78642-2616

MEHTA , JAY K
320 VALLETTA WAY
LIBERTY HILL TX 78642-2554

MENDU , SPOORTHY
609 PICKRELL LOOP
LIBERTY HILL TX 78642-2538

MIHNOVETS , NICK
508 HALLWOOD DR
LIBERTY HILL TX 78642-2491

MILLER , BARBARA & RANDY
617 FAITH DR
LIBERTY HILL TX 78642-2150

MILLER , JAMES RANDY
617 FAITH DR
LIBERTY HILL TX 78642-2150

MINGS , ABIGAIL & JOSH
320 RIETI PKWY
LIBERTY HILL TX 78642-2308

MINGS , ABIGAIL
308 OLINDA WAY
LIBERTY HILL TX 78642-2611

MISHAN , CHAZ
845 OLINDA WAY
LIBERTY HILL TX 78642-2616

MOHAN , NISHOK
220 POOLE LN
LIBERTY HILL TX 78642-2497

MONARCH-GUSTILO , COREY BETH
512 EL VADO CIR
LIBERTY HILL TX 78642-4926

MOONSAMMY , MRS CINDY
100 ORVIETO LN
LIBERTY HILL TX 78642-4488

MORRIS , STEPHANIE RYDER
BIRDS N BEES FARM
1409 ORCHARD DR
LEANDER TX 78641-1368

MOTHUKURI , SUSHANTH
336 REDONDA DR
LIBERTY HILL TX 78642-2576

MURALI , ABHILASH
229 CANYONCREST WAY
LIBERTY HILL TX 78642-2618

MURALI , KYLA
229 CANYONCREST WAY
LIBERTY HILL TX 78642-2618

MURPHY , KORY
205 REBEL RED RD
LIBERTY HILL TX 78642-2128

MURTHY , SRINIVAS
104 ROCK KNOLL ST
LIBERTY HILL TX 78642-2427

MUTHU KRISHNA PILLAI , MRS USHA
216 CANYONCREST WAY
LIBERTY HILL TX 78642-2618

MUTHU , VIMALRAJ
421 BELLA LUNA WAY
LIBERTY HILL TX 78642-2407

MYSA , SAKETH
244 CANYONCREST WAY
LIBERTY HILL TX 78642-2618

NADIMPALLI , SAI
219 KRUPP AVE
LIBERTY HILL TX 78642-4492

NALLANAGULAGARI , LALITH
612 SPURLOCK WAY
LIBERTY HILL TX 78642-2514

NALLU , JAGADEESH
116 RAY CT
LIBERTY HILL TX 78642-2511

NASH , CINDY
205 ENCORE DR
LIBERTY HILL TX 78642-2147

NATH , AMAR
138 ARCADIAN LN
LIBERTY HILL TX 78642-2297

NEDS , RON
101 INSPIRATION DR
LIBERTY HILL TX 78642-4466

NEDUNOORI , SAKETH
101 RAY CT
LIBERTY HILL TX 78642-2511

NEELAM , MR ABHILASH
180 LA DERA DR
LIBERTY HILL TX 78642-2121

NEELD , MR DAVID
233 ALICANTE LN
LIBERTY HILL TX 78642-2550

NEELLA , MR BHASKAR
433 BELLA LUNA WAY
LIBERTY HILL TX 78642-2407

NEMANA , LAKSHMI
416 SPURLOCK WAY
LIBERTY HILL TX 78642-2512

NGUYEN , ZEE
236 ROSETTA LOOP
LIBERTY HILL TX 78642-2594

NIMMAKAYALA , ABHISHEK
304 PALATINO BND
LIBERTY HILL TX 78642-2565

NUTA , RAKESH
216 ORVIETO LN
LIBERTY HILL TX 78642-4454

P , DINESH
305 SONBRIA PASS
LIBERTY HILL TX 78642-2307

P , K
221 BELLA LUNA WAY
LIBERTY HILL TX 78642-2405

PARELLY , SRUJANA
109 RAY CT
LIBERTY HILL TX 78642-2511

PARK , JAMES
256 CANYONCREST WAY
LIBERTY HILL TX 78642-2618

PATEL , JIGAR
805 OLINDA WAY
LIBERTY HILL TX 78642-2616

PATEL , SUNIL G
128 RAVELLO ST
LIBERTY HILL TX 78642-2306

PATEL , TAMARA
128 RAVELLO ST
LIBERTY HILL TX 78642-2306

PEDDI , PHANI BHUSHAN
225 JANELLE LN
LIBERTY HILL TX 78642-2403

PETERSON , BRIAN
320 PEGGY DR
LIBERTY HILL TX 78642-4460

PETERSON , JAIME
716 GREAT LAWN BND
LIBERTY HILL TX 78642-2499

PEYTON , RENEE
121 NIGHT BLOOM PATH
LIBERTY HILL TX 78642-2365

PLASEK , JAMES D
212 CASTILLO BND
LIBERTY HILL TX 78642-2679

POOJARY , SURAJ
204 BELLA LUNA WAY
LIBERTY HILL TX 78642-2405

PRADHAN , VIMAL
536 GREAT LAWN BND
LIBERTY HILL TX 78642-2465

PRATER , ZANEIN
765 OLINDA WAY
LIBERTY HILL TX 78642-2615

PRIMROSE , BRYAN
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

PRIMROSE , BRYAN & JACKIE
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

PRIMROSE , JACKIE
3901 COUNTY ROAD 258
LIBERTY HILL TX 78642-2106

PULAGAM , KISHORE
236 CALERA ST
LIBERTY HILL TX 78642-2192

PUTHIYEDATH , AJAY
100 ROCK KNOLL ST
LIBERTY HILL TX 78642-2427

RAJ , MR BINU
121 LOCKHART DR
LIBERTY HILL TX 78642-2318

RAJAGOPALAN , SADAGOPAN
104 ORVIETO CV
LIBERTY HILL TX 78642-4452

RAMACHANDRAN , LAKSHMANA
236 JANELLE LN
LIBERTY HILL TX 78642-2403

RAMANNA , PRADEEP
145 MORNINGDALE DR
LIBERTY HILL TX 78642-2607

RAMAVARAPU , MR SRIDHAR
849 OLINDA WAY
LIBERTY HILL TX 78642-2616

RANCEL , ALEX
348 LA DERA DR
LIBERTY HILL TX 78642-2122

RANGARAJ , DHARANI
104 LOTTI LN
LIBERTY HILL TX 78642-2468

RAVILLA , MR SREE HARSHA
740 OLINDA WAY
LIBERTY HILL TX 78642-2615

RAVURI , SIVANAGAADITYA
509 MONROVIA CT
LIBERTY HILL TX 78642-2504

REBERS , RYAN
220 NORCIA LOOP
LIBERTY HILL TX 78642-4450

REDDY , MOUNIKA
204 PROSA LN
LIBERTY HILL TX 78642-0228

REDDY , SANDEEP
621 SPURLOCK WAY
LIBERTY HILL TX 78642-2514

REGEHR , ALLEN
108 PROSA LN
LIBERTY HILL TX 78642-4473

RESU , SANTOSH REDDY
217 MONROVIA WAY
LIBERTY HILL TX 78642-2726

RIGHETTI , BRIAN & JOYCE
137 KRUPP AVE
LIBERTY HILL TX 78642-4476

ROEDLAND , ANDERS
116 CORONELLA DR
LIBERTY HILL TX 78642-2323

ROMBOLA , DANIEL
412 GREAT LAWN BND
LIBERTY HILL TX 78642-2466

ROY-KONDEPATI , DR. PAMELA
205 CALERA ST
LIBERTY HILL TX 78642-2192

RUDOLPH , NATHAN
704 FAITH DR
LIBERTY HILL TX 78642-2247

SAHOO , SACHIDANANDA
100 REBEL RED RD
LIBERTY HILL TX 78642-2127

SAHUKARI , ANIL
228 BELLA LUNA WAY
LIBERTY HILL TX 78642-2405

SALIYA , NIRALI
241 CANYONCREST WAY
LIBERTY HILL TX 78642-2618

SAMPATH , ARUN BALAJI
104 LOTTI LN
LIBERTY HILL TX 78642-2468

SANDERS , TIA
564 FAITH DR
LIBERTY HILL TX 78642-2149

SANSOM , MRS MINNIE FAYE
3495 COUNTY ROAD 258
LIBERTY HILL TX 78642-4791

SARAIYA , KHANJAN
844 OLINDA WAY
LIBERTY HILL TX 78642-2616

SARGIRO , MOHAMMED MUZAMM
129 LOCKHART DR
LIBERTY HILL TX 78642-2318

SARMA , MR PANKAJ K
400 VALLETTA WAY
LIBERTY HILL TX 78642-2555

SATHYAKUMAR , SAI SUCHITHRA
208 SADABA ST
LIBERTY HILL TX 78642-2557

SHAFFER , JENNIFER
300 CANYONCREST WAY
LIBERTY HILL TX 78642-2619

SHAIKH , FURQAN
237 JANELLE LN
LIBERTY HILL TX 78642-2403

SHEN , MS JANA
408 BEREAN LN
LIBERTY HILL TX 78642-2584

SHERMAN , TRINA
251 TOWER RD
LIBERTY HILL TX 78642-2101

SHIRLEY , MR DEAN
128 LA VENTANA DR
LIBERTY HILL TX 78642-2588

SHIVAPRASAD , PRAVEEN
432 BEREAN LN
LIBERTY HILL TX 78642-2584

SING , KUMAR
160 ALICANTE LN
LIBERTY HILL TX 78642-2549

SIRUVOLU , LAKSHMAN
837 OLINDA WAY
LIBERTY HILL TX 78642-2616

SIVELLS , MATTHEW
201 JOYA DR
LIBERTY HILL TX 78642-2158

SIVELLS , MELANIE
201 JOYA DR
LIBERTY HILL TX 78642-2158

SKINNER , K
200 VALLETTA WAY
LIBERTY HILL TX 78642-2553

SMITH , DARRELL
109 OAKLEY PASS
LIBERTY HILL TX 78642-2488

SMITH , DAVID
409 TEXON DR
LIBERTY HILL TX 78642-2154

SMITH , LONDON
PO BOX 917
GEORGETOWN TX 78627-0917

SMITH , SUSAN MARIE
820 FAITH DR
LIBERTY HILL TX 78642-2225

SNEHA , KOSURI
219 KRUPP AVE
LIBERTY HILL TX 78642-4492

SOLANKI , MR ANKITKUMAR
544 GREAT LAWN BND
LIBERTY HILL TX 78642-2465

SPENCER , PATRICK M
100 ALAVA WAY
LIBERTY HILL TX 78642-2481

SRIDHAR , ARJUN
217 BELLA LUNA WAY
LIBERTY HILL TX 78642-2405

STARLING , LACY
113 TRAMMELL WAY
LIBERTY HILL TX 78642-2471

STEPHENS , KRYSTAL
101 DIAMANTES DR
LIBERTY HILL TX 78642-2160

STEWART SIERRAS , JESSICA
148 CASCATA WAY
LIBERTY HILL TX 78642-2125

STEWART , PAUL
525 MONROVIA CT
LIBERTY HILL TX 78642-2504

STEWART , SUZANNE
525 MONROVIA CT
LIBERTY HILL TX 78642-2504

STONEY , MRS GABRIELLE
113 ROSEBUSH DR
LIBERTY HILL TX 78642-2253

STUCHELL , CASI
121 DOUBLE MOUNTAIN RD
LIBERTY HILL TX 78642-2131

SUBRAMANEY , VINODKUMAR
132 BELL CHIME DR
LIBERTY HILL TX 78642-2609

SUDARSANAKUMAR , SOORAJ
309 BEREAN LN
LIBERTY HILL TX 78642-2506

SUKUMARAN , MRS SHYJA
121 LOCKHART DR
LIBERTY HILL TX 78642-2318

SURESH , SUJATHA
408 GREAT LAWN BND
LIBERTY HILL TX 78642-2466

SUWINSKI , ADRIANA ELROD
757 OLINDA WAY
LIBERTY HILL TX 78642-2615

SUWINSKI , HANS CHARLES
757 OLINDA WAY
LIBERTY HILL TX 78642-2615

SZALAY , JOZSEF
108 OAKLEY PASS
LIBERTY HILL TX 78642-2488

TANNERU , BHANU SHANKAR
820 OLINDA WAY
LIBERTY HILL TX 78642-2616

THOKALA , VINUTHA
612 SPURLOCK WAY
LIBERTY HILL TX 78642-2514

THOMAS , ERIC
201 NASH LN
LIBERTY HILL TX 78642-4456

THOTA , NIKIL TEJA
500 BELL CHIME CV
LIBERTY HILL TX 78642-2621

THOTA , MR YASH
528 SPURLOCK WAY
LIBERTY HILL TX 78642-2513

TOOMU , KRISHNA TEJA
420 PALATINO BND
LIBERTY HILL TX 78642-2566

TURK , KRISTEN
316 JOYA DR
LIBERTY HILL TX 78642-2159

UPPALA , SHASHANK
605 SPURLOCK WAY
LIBERTY HILL TX 78642-2514

VADDEPALLY , PRIYA
312 REDONDA DR
LIBERTY HILL TX 78642-2576

VAKACHARLA , SARATH
109 SURI DR
LIBERTY HILL TX 78642-4494

VAKKALAGADDA , VENKATA JAYA RA
148 BANYON DR
LIBERTY HILL TX 78642-2539

VANGA , SIVA
100 PALATINO BND
LIBERTY HILL TX 78642-2551

VEDULA , ANISH
228 DYCUS BND
LIBERTY HILL TX 78642-2509

VELEZ , GIESEL
316 NORCIA LOOP
LIBERTY HILL TX 78642-1909

VELLANKI , VINOD
328 ALICANTE LN
LIBERTY HILL TX 78642-2551

VELLORE RAJANBABU , VENKATESH KHANN
121 CHRISTIAN CT
LIBERTY HILL TX 78642-2371

VEMIREDDY , ARUN
209 PEGGY DR
LIBERTY HILL TX 78642-4459

VEMULA , NARESH
220 BELLA LUNA WAY
LIBERTY HILL TX 78642-2405

VIDIYALA , MADHU
340 RIETI PKWY
LIBERTY HILL TX 78642-2308

VUPPULURI , ROHIT
209 BELLA LUNA WAY
LIBERTY HILL TX 78642-2405

WALKER , CAROLINE
117 DOUBLE MOUNTAIN RD
LIBERTY HILL TX 78642-2131

WALKER , DYLAN
117 DOUBLE MOUNTAIN RD
LIBERTY HILL TX 78642-2131

WATSON , ROBERT
577 PEACE DR
LIBERTY HILL TX 78642-2258

WHITTAKER , ANDREA
124 RAVELLO ST
LIBERTY HILL TX 78642-2306

WILLIS , RANDY
577 FAITH DR
LIBERTY HILL TX 78642-2149

WOLFF , BEN
761 OLINDA WAY
LIBERTY HILL TX 78642-2615

WOLFF , BEN & JANELLE
761 OLINDA WAY
LIBERTY HILL TX 78642-2615

YAMPARALA , NAVEEN
128 BELL CHIME DR
LIBERTY HILL TX 78642-2609

YELAMPALLE , NAGI REDDY
120 BENNINGTON DR
LIBERTY HILL TX 78642-2571

YELURI , AVINASH
235 BELLA LUNA WAY
LIBERTY HILL TX 78642-2405

YENUMULA , SAI
109 CRIMSON ROSE CT
LIBERTY HILL TX 78642-2515

YERRAVALI , VAIDEHI
149 MORNINGDALE DR
LIBERTY HILL TX 78642-2607

TPDES PERMIT NO. WQ0015000001

APPLICATION BY THE	§	BEFORE THE
CITY OF LIBERTY HILL FOR TPDES	§	TEXAS COMMISSION
PERMIT NO. WQ0015000001	§	ON ENVIRONMENTAL
	§	QUALITY

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Public Comment (Response or RTC) on the application by City of Liberty Hill (Applicant) for a renewal of Texas Pollutant Discharge Elimination System (TPDES) permit No. WQ0015000001 and the Executive Director's preliminary decision on the application. As required by Title 30 of the Texas Administrative Code (30 TAC) Section (§) 55.156, before a permit is issued, the Executive Director prepares a response to all timely, significant, or relevant and material comments. The Office of the Chief Clerk received timely comments from the persons listed in (Attachment A through O). This response addresses all timely public comments received, whether or not withdrawn.

This application is subject to the requirements in Senate Bill (SB) 709, effective September 1, 2015. SB 709 amended the requirements for comments and contested case hearings. One of the changes required by SB 709 is that the Commission may not find that a "hearing requestor is an affected person unless the hearing requestor timely submitted comments on the permit application." Texas Water Code (TWC) § 5.115(a-1)(2)(B).

If you need more information about this permit application or the wastewater permitting process, please call the TCEQ Public Education Program at 1-800-687-4040. General information about the TCEQ can be found at the following website:

www.tceq.texas.gov.

I. BACKGROUND

A. Description Of Facility

The Applicant, City of Liberty Hill, submitted an application to the TCEQ for a renewal of TPDES Permit No. WQ0015000001 to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 100,000 gallons per day (gpd) in the Interim I phase, a daily average flow not to exceed 350,000 gpd in the Interim II phase, and an annual average flow not to exceed 1,400,000 gpd in the Final phase. The Applicant proposes to operate the Santa Rita Upper Middlebrook Wastewater Treatment Facility (WWTF), which will serve the Santa Rita/Upper Middlebrook Development.

The Santa Rita Upper Middlebrook Wastewater Treatment Facility will consist of a membrane bioreactor (MBR) treatment system, which combines conventional biological activated sludge processes with membrane filtration. Treatment units in the Interim I and Interim II phases will include a fine screen, two anoxic basins, two anaerobic basins, two aerobic basins, two MBR basins, a sludge holding tank, and either a chlorine contact chamber, or an ultraviolet light (UV) disinfection system. Treatment units in the Final Phase will include a fine screen, two anoxic basins, two anaerobic basins, two aerobic basins, three MBR basins, a sludge holding tank, and either a chlorine contact chamber, or a UV disinfection system. The facility has not been constructed.

If the draft permit is issued, the treated effluent will be discharged to an unnamed tributary, thence to Soves Branch, thence to North Fork San Gabriel River in Segment No. 1251 of the Brazos River Basin. The designated uses for Segment No. 1251 are primary contact recreation, public water supply, aquifer protection, and high aquatic life use. The effluent limits in the draft permit will maintain and protect the existing instream uses. All determinations are preliminary and subject to additional review and revisions.

Geographic coordinates of the outfall location in decimal degrees are provided in Table 1. If this permit is issued, the proposed facility will be located approximately 2.5 miles north of the intersection of Ronald Reagan Boulevard and State Highway 29, in Williamson County, Texas 78628.

Table 1. Outfall Coordinate Location

Outfall Number	Latitude	Longitude
001	30.672886 N	97.842258 W

The draft permit includes the following proposed effluent limitations and monitoring requirements. All flows, except the two-hour peak flow, are expressed in million gallons per day (MGD). The two-hour (2-hr) peak flow is expressed in gallons per minute (gpm). All pH values are expressed in standard units (SU). Concentration values are expressed in milligrams per liter (mg/L). Mass-based values are expressed as pounds per day (lbs/day). Bacteria values are expressed in colony-forming units (CFU) or most probable number (MPN) per 100 milliliters (CFU or MPN/100 mL).

Table 2. Interim I Phase Effluent Limitations: Outfall 001

Parameter/Pollutant	Daily Average		7-day Average	Daily Maximum	Single Grab	Monitoring Requirements
	mg/L	lbs/day	mg/L	mg/L	mg/L	
Flow	0.10		N/A	N/A	N/A	Continuous
Carbonaceous Biochemical Oxygen Demand, 5-day (CBOD ₅)	5	4.2	10	20	30	One/week
Total Suspended Solids (TSS)	5	4.2	10	20	30	One/week
Ammonia Nitrogen (NH ₃ -N)	2	1.7	5	10	15	One/week
Total Phosphorus (P)	1	0.83	2	4	6	
<i>E. coli</i> (CFU or MPN/100 mL)	126	N/A	N/A	N/A	399	Five/week* One/month**

*Sampling frequency for an Ultraviolet Light disinfection system.

**Sampling frequency for a chlorination disinfection system.

The daily average flow of effluent shall not exceed 0.10 MGD, nor shall the average discharge during any two-hour period (2-hour peak) exceed 139 gpm. The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per month by grab sample. The permittee shall utilize a UV system for disinfection purposes. Or the effluent shall contain a chlorine residual of at least 1.0 mg/l and shall not exceed a 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 effluent shall contain a minimum dissolved oxygen of 4.0 mg/l and shall be monitored once per week by grab sample.

Table 3. Interim II Phase Effluent Limitations: Outfall 001

Parameter/Pollutant	Daily	Average	7-day	Daily	Single	Monitoring Requirements
	mg/L	lbs/day	Average mg/L	Maximum mg/L	Grab mg/L	
Flow	0.35		N/A	N/A	N/A	Continuous
Carbonaceous Biochemical Oxygen Demand, 5-day (CBOD ₅)	5	15	10	20	30	One/week
Total Suspended Solids (TSS)	5	15	10	20	30	One/week
Ammonia Nitrogen (NH ₃ -N)	2	5.8	5	10	15	One/week
Total Phosphorus (P)	1	2.9	2	4	6	One/week
<i>E. coli</i> (CFU or MPN/100 mL)	126	N/A	N/A	N/A	399	Five/week* One/month**

*Sampling frequency for an Ultraviolet Light disinfection system.

**Sampling frequency for a chlorination disinfection system.

The daily average flow of effluent shall not exceed 0.35 MGD, nor shall the average discharge during any two-hour period (2-hour peak) exceed 486 gpm. The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per month by grab sample. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/l and shall be monitored once per week by grab sample. The permittee shall utilize an UV system for disinfection purposes. Or the effluent shall contain a chlorine residual of at least 1.0 mg/l and shall not exceed a 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.

Table 4. Final Phase Effluent Limitations: Outfall 001

Parameter/Pollutant	Daily	Average	7-day	Daily	Single	Monitoring Requirements
	mg/L	lbs/day	Average mg/L	Maximum mg/L	Grab mg/L	
Flow	1.4		N/A	N/A	N/A	Continuous
Carbonaceous Biochemical Oxygen Demand, 5-day (CBOD ₅)	5	58	10	20	30	Two/week
Total Suspended Solids (TSS)	5	58	10	20	30	Two/week
Ammonia Nitrogen (NH ₃ -N)	2	23	5	10	15	Two/week
Total Phosphorus (P)	0.5	5.8	1	2	3	Two/week
<i>E. coli</i> (CFU or MPN/100 mL)	126	N/A	N/A	N/A	399	Daily* One/week**

*Sampling frequency for an Ultraviolet Light disinfection system.

**Sampling frequency for a chlorination disinfection system.

The annual average flow of effluent shall not exceed 1.4 MGD, nor shall the average discharge during any two-hour period (2-hour peak) exceed 1,944 gpm. The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per month by grab sample. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/l and shall be monitored twice per week by grab sample.

The permittee shall utilize an UV system for disinfection purposes. Or the effluent shall contain a 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 chlorine residual and shall monitor chlorine residual daily by grab sample after the dechlorination process. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

B. Procedural Background

The permit application was received on March 23, 2023, and declared administratively complete on May 10, 2023. The Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) was published on July 2, 2023, in the *Williamson County Sunday Sun*. The Notice of Application and Preliminary Decision (NAPD) was published on April 24, 2024, in the *Williamson County Sunday Sun*. The revised NORI, NAPD, and

the Notice of Public Meeting was published on October 30, 2024, in the *Williamson County Sunday Sun*. The public comment period ended on December 3, 2024.

This application was filed on or after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill (HB) 801, 76th Legislature (1999), and Senate Bill (SB) 709, 84th Legislature (2015), both implemented by the Commission in its rules in 30 TAC Chapters 39, 50, and 55. The Texas Legislature enacted SB 709, effective September 1, 2015, amending the requirements for comments and contested case hearings. This application is subject to those changes in the law.

C. Access to Rules, Laws, and Records

Please consult the following websites to access the rules and regulations applicable to this permit:

- Secretary of State website: www.sos.state.tx.us;
- TCEQ rules in 30 TAC: www.sos.state.tx.us/tac;
- Texas statutes: www.statutes.legis.state.tx.us;
- TCEQ downloadable rules: www.tceq.texas.gov/rules/indxpdx.html;
- Federal rules in Title 40 of the Code of Federal Regulations: <https://www.ecfr.gov/current/title-40>; and
- Federal environmental laws: www.epa.gov/lawsregs.

Commission records for this application are available for viewing and copying and are located at TCEQ's main office in Austin, 12100 Park 35 Circle, Building F, 1st Floor (Office of Chief Clerk). The permit application, Executive Director's preliminary decision, and draft permit are available for viewing and copying at Liberty Hill Public Library, 355 Loop 332, Liberty Hill, Texas.

II. COMMENTS AND RESPONSES

COMMENT 1:

The individuals listed in Attachment A expressed a general opposition to the draft permit.

RESPONSE 1:

The Executive Director acknowledges these comments.

COMMENT 2:

The following individuals expressed support for the draft permit: James Edward Horne, Ron Neds, James D. Plasek, Teresa Cantu, and Brian Birdwell.

RESPONSE 2:

The Executive Director acknowledges these comments.

COMMENT 3:

The individuals listed in Attachment B expressed concern about water quality. They expressed concern about potential adverse effects on the dry creek, negative impacts to Lake Georgetown, a toxic mix of contaminants and chemicals resulting in water contamination, low-flow, eutrophication, and the proliferation of algae. Many of these individuals request the highest level of treatment at the facility. Many individuals recommended more stringent effluent limits.

RESPONSE 3:

TCEQ is responsible for the protection of water quality with federal regulatory authority over discharges of pollutants to Texas surface water. TCEQ has a legislative responsibility to protect water quality in the State of Texas and to authorize wastewater discharge TPDES permits under Texas Water Code (TWC) Chapter 26, and 30 TAC Chapters 305, 307 and 309, including specific rules regarding wastewater treatment systems under 30 TAC Chapters 217 and 309.

The proposed draft permit was developed in accordance with the TSWQS to be protective of water quality, provided that City of Liberty Hill operates and maintains the proposed facility according to TCEQ rules and the proposed permit's requirements. The methodology outlined in the *Procedures to Implement the Texas Surface Water Quality Standards* (June 2010) is designed to ensure compliance with the TSWQS (30 TAC Chapter 307).

Specifically, the methodology is designed to ensure that no source will be allowed to discharge any wastewater that: 1) results in instream aquatic toxicity; 2) causes a violation of an applicable narrative or numerical state water quality standard; 3) results in the endangerment of a drinking water supply; or 4) results in aquatic bioaccumulation that threatens human health.

As part of the application process, TCEQ staff must determine the uses of the receiving waters and set effluent limits that are protective of those uses. In order to achieve the goal of maintaining a level of water quality sufficient to protect existing water body uses, the proposed permit contains several water quality specific parameter requirements that limit the potential impact of the discharge on the receiving waters.

Effluent limitations in the draft permit for the conventional effluent parameters (i.e. CBOD₅, TSS, NH₃-N, Total Phosphorus and minimum DO) are based on stream standards and waste load allocations for water quality-limited streams as established in the TSWQS and the State of Texas Water Quality Management Plan (WQMP).

The treated effluent will be discharged to an unnamed tributary, thence to Sowes Branch, thence to North Fork San Gabriel River in Segment No. 1251 of the Brazos River Basin. As per TCEQ Water Quality Assessment's review, the unnamed tributary is an intermittent stream and Sowes Branch is intermittent stream with perennial pools. The definition of an intermittent stream with perennial pools is an intermittent stream that maintains persistent pools even when flow in the stream is less than 0.1 cubic feet per second. This discharge will not have a negative impact on Lake Georgetown.

A total phosphorous (TP) screening was conducted to determine whether a nutrient limit was necessary. The TP screening determined that best professional judgement should be used to determine whether TP monitoring or a TP limit is needed. The TCEQ Standards Implementation Team recommends a 1.0/1.0/0.5 mg/L (Interim I, Interim II, and Final phases) of total phosphorus limits to protect and maintain water quality within the receiving streams and segment. Considering the nutrient screening results, stream characteristics, the size of the discharge, similar discharges, and the increasing number of discharges within the watershed, these TP limits were added to the permit to help preclude degradation due to nutrients that could lead to algal growth. Related to phosphorus, a key nutrient necessary for algae growth and often in limited supply in freshwater systems, consistent with TCEQ's IPs (June 2010), a nutrient screening was performed for the proposed discharge and indicated that site-specific conditions in the receiving waters may be conducive to algal growth.

The draft permit prepared by the Executive Director complies with all applicable statutory and regulatory requirements, and therefore, will be protective of water quality, and aquatic life. Specifically, to ensure that aquatic life will be protected, a dissolved oxygen (DO) modeling analysis was performed. The higher stringent effluent limits of 5.0 mg/L CBOD₅, 5.0 mg/L TSS, 2.0 mg/l NH₃-N, 1.0/1.0/0.5 mg/L TP (Interim I, Interim II, and Final phases), and 4.0 mg/l minimum effluent DO in the draft permit were set to maintain and protect the existing instream uses.

In the application, the Applicants indicated that the treatment process of the proposed facility would use an activated sludge and biological nutrient removal process plant using a membrane bioreactor (MBR) operated with supervisory control and data acquisition control system process. This treatment process will not make a significant contribution of air contaminants to the atmosphere pursuant to the Texas Health and Safety Code's Texas Clean Air Act §§ 382.057 and 382.05196 and is therefore permitted by rule.

COMMENT 4:

The individuals listed in Attachment C expressed concern about groundwater quality and/or water supply. These individuals pointed out that the effluent will flow into Sowes Branch, then into the North Fork of San Gabriel River, and then into Lake Georgetown, which is one of their drinking water sources. They point out that drinking water might be contaminated for thousands of residents.

RESPONSE 4:

The legislature has determined that “the goal of groundwater policy in this state is that the existing quality of groundwater is not degraded. This goal of non-degradation does not mean zero-contaminant discharge.”¹ Chapter 26 of the Texas Water Code further states, “discharges of pollutants, disposal of wastes, or other activities subject to regulation by state agencies be conducted in a manner that will maintain present uses and not impair potential uses of groundwater or pose a public health hazard.”²

¹ Texas Water Code § 26.401(b).

² Texas Water Code § 26.401(c)(2).

The Water Quality Division has determined that the draft permit is in accordance with the TSWQS, which ensures that the effluent discharge is protective of aquatic life, human health, and the environment. The review process for surface water quality is conducted by the Standards Implementation Team and Water Quality Assessment Team surface water modelers. The Water Quality Division has determined that if the surface water quality is protected, then the groundwater quality in the vicinity will not be impacted by the discharge. Therefore, the permit limits given in the draft permit intended to maintain the existing uses of the surface waters and preclude degradation will also protect groundwater.

Further, 30 TAC § 309.13(c) states that a wastewater treatment plant unit may not be located closer than 500 feet from a public water well nor 250 feet from a private water well. The Ground Water Rule does not address private wells because they are not under the jurisdiction of the Safe Drinking Water Act and are therefore not subject to TCEQ regulation. TCEQ recommends that private well owners periodically test their water for microbial and chemical contaminants and properly maintain their well.

TCEQ water quality division staff evaluated the application as an authorization to discharge treated wastewater into water in the State. Thus, the quality of the discharge and method of achieving that quality must follow the Federal Clean Water Act (CWA), Texas Water Code (TWC), and the Texas Surface Water Quality Standard (TSWQS).

The TSWQS is a primary mechanism for the TCEQ to protect human health, surface and groundwater quality, aquatic life, the environment, and specifically, the designated uses of the receiving waters. The TSWQS requires that discharges not cause surface waters to be toxic to aquatic life, terrestrial wildlife, livestock, or domestic animals, not degrade receiving waters, and not result in situations that impair existing, attainable, or designated uses. Likewise, the TPDES program mandates that discharges of treated effluent into water in the state from facilities regulated by TPDES permits meet the requirements of the TSWQS.

As specified in the methodologies from the TCEQ IPs, TPDES permits issued by the TCEQ must maintain water in the state to preclude adverse toxic effects on human health resulting from contact recreation, consumption of aquatic organisms, consumption of drinking water, or any combination of the three. Relatedly, municipal

facilities typically do not have industrial contributors, and therefore, do not have toxins in their effluent. In addition, permits must prevent adverse toxic effects on aquatic life, terrestrial life, livestock, and domestic animals resulting from contact, consumption of aquatic organisms, consumption of water, or any combination of the three. The design of the proposed permit ensures these water quality standards will be met.

COMMENT 5:

The individuals listed in Attachment D expressed a general concern about the WWTPs impact on the environment. Several individuals expressed concern about the environment resulting from construction of the facility. Many note environmental concerns related to the facility placed in a densely populated area that may cause nuisance odors for the residents. Many individuals express concern regarding soil health and ecosystems.

RESPONSE 5:

The TCEQ has primary authority over water quality in Texas and also federal regulatory authority for the TPDES program, which controls discharges of pollutants into Texas surface waterbodies (“water in the state”). The Texas Water Code (TWC) § 26.027, authorizes the TCEQ to issue permits for discharges into water in the state, and the ED evaluates applications for discharge permits based on the information provided in the application and can recommend issuance or denial of an application based on its compliance with the TWC and TCEQ rules. Specifically, the ED’s technical review evaluates impacts from the proposed discharge on the environment, receiving waters, starting at the discharge point (an unnamed tributary), according to 30 TAC Chapter 307, the Texas Surface Water Quality Standards (TSWQS), and the TCEQ’s *Implementation Procedures for the Texas Surface Water Quality Standards*-June 2010 (IPs).

The wastewater treatment facility’s design will undergo further review during the TCEQ Plans and Specifications Team’s review under section 217.6 of the TCEQ’s rules, which must be completed prior to facility construction. The construction impact will be contained within the treatment facility boundary, with an approximate maximum depth of excavation of 30 feet. According to the applicants, the nearest wastewater treatment unit will be more than 300 feet from the closest neighboring

property boundary, thereby exceeding the minimum distance of 250 feet between a wastewater treatment plant unit and private water well required by section 309.13(c) of TCEQ's rules. The proposed draft permit was developed in accordance with the Texas Surface Water Quality Standards (TSWQS) found in title 30, chapter 307 of the Texas Administrative Code. These standards were designed to maintain the quality of water in the state and to be protective of human health and the environment. Section 307.4(d) of the TSWQS states, "Surface waters will not be toxic to man from ingestion of water, consumption of aquatic organisms, or contact with the skin, or to terrestrial or aquatic life." The methodology outlined in the TCEQ's "Procedures to Implement the TSWQS" (IPs) ensures compliance with the requirements of chapter 307. Specifically, the methodology is designed to ensure that no source will be allowed to discharge any wastewater which (1) results in instream aquatic toxicity; (2) causes a violation of an applicable narrative or numerical state water quality standard; (3) results in the endangerment of a drinking water supply; or (4) results in aquatic bioaccumulation that threatens human health.

Section 309.13(e) of TCEQ's rules requires domestic facilities to meet buffer zone requirements for the abatement and control of nuisance odor by complying with one of three options: 1) ownership of the buffer zone area; 2) restrictive easements from the adjacent property owners for any part of the buffer zone not owned by the applicant; or 3) providing nuisance odor control. According to their application, the applicants intend to comply with the requirement to abate and control nuisance odor by the restrictive easements from the adjacent property owners for any part of the buffer zone not owned by the applicant, i.e., by locating the treatment units at least 150 feet from their property line. This requirement was incorporated into the draft permit at Other Requirement No. 4. Therefore, nuisance odor is not expected to occur as a result of the permitted activities at the facility if the applicant operates the facility in compliance with TCEQ rules and the terms and conditions of the draft permit.

COMMENT 6:

The individuals listed in Attachment E expressed concern about wildlife and/or livestock. Several individuals express concern about aquatic life, habitat loss and extinction, local wildlife including fish, and local ecosystems especially in the event of a leak or spill.

RESPONSE 6:

Chapter 26 of the TWC and TCEQ's water quality rules are written for the protection of public health, aquatic life, and the environment. Accordingly, the stated policy of both the Water Code and the TSWQS is:

to maintain the quality of water in the state consistent with the public health and enjoyment, the propagation and protection of terrestrial and aquatic life, and the operation of existing industries, taking into consideration the economic development of the state; to encourage and promote the development and use of regional and area-wide waste collection, treatment, and disposal systems to serve the waste disposal needs of the citizens of the state; and to require the use of all reasonable methods to implement this policy.³

The proposed permit also requires the Applicant to “take all reasonable steps to minimize or prevent any discharge or sludge use or disposal or other permit violation that has a reasonable likelihood of adversely affecting human health.

WQD staff evaluated the application as an authorization to discharge treated wastewater into water in the State. Thus, the quality of the discharge and method of achieving that quality must follow the Federal Clean Water Act, TWC, and the TSWQS. The TSWQS is a primary mechanism for the TCEQ to protect human health, surface and groundwater quality, aquatic life, the environment, and specifically, the designated uses of the receiving waters. The TSWQS require that discharges not cause surface waters to be toxic to aquatic life, terrestrial wildlife, livestock, or domestic animals, not degrade receiving waters, and not result in situations that impair existing, attainable, or designated uses. Likewise, the TPDES program mandates that discharges of treated effluent into water in the state from facilities regulated by TPDES permits meet the requirements of the TSWQS.

As specified in the methodologies from the TCEQ IPs, TPDES permits issued by the TCEQ must maintain water in the state to preclude adverse toxic effects on human health resulting from contact recreation, consumption of aquatic organisms, consumption of drinking water, or any combination of the three. Relatedly, municipal facilities typically do not have industrial contributors, and therefore, do not have

³ Texas Water Code § 26.003 and 30 TAC § 307.1.

toxins in their effluent. In addition, permits must prevent adverse toxic effects on aquatic life, terrestrial life, livestock, and domestic animals resulting from contact, consumption of aquatic organisms, consumption of water, or any combination of the three. The design of the proposed permit ensures these water quality standards will be supported.

WQD Staff drafted the proposed permit with provisions to ensure that the TSWQS will be maintained, ensuring the proposed discharge is protective of human health, aquatic life, livestock, domestic animals, and the environment. Likewise, the proposed permit's effluent limits will protect the uses and quality of the waterbodies in the route of the proposed discharge for the benefit of the aquatic life and terrestrial wildlife that depend on it. WQD Staff determined that the proposed permit complies with the TSWQS, ensuring that the effluent discharged is protective of human health.

Finally, The Texas Parks and Wildlife Department (TPWD) is the state agency that oversees and protects wildlife and their habitat. TPWD received notice of the permit application pursuant to 30 TAC § 39.413(5). They can be contacted by phone at 1-800-792-1112 or by mail at 4200 Smith School Road, Austin, Texas 78744.

The draft permit contains multiple requirements related to preventing unauthorized discharges at the proposed facility. For example, Permit Condition No. 2.g prohibits unauthorized discharges, Operational Requirement No. 1 requires the permittee to properly operate and maintain the facility at all times, and Operational Requirement No. 4 requires the permittee to install safeguards that will prevent the discharge of untreated wastewater during a power failure. Under Monitoring and Reporting Requirement No. 1, the Applicant must submit their effluent test results to TCEQ each month. If an unauthorized discharge that endangers human health or the environment occurs, the Applicant is required to report it to TCEQ within 24 hours under Monitoring and Reporting Requirement No. 7. This must be followed up by a written report within five working days that includes a description of the potential danger to human health and the environment, the timeframe for when the problem will be corrected, and the steps the Applicant will take to mitigate any damage and prevent this type of problem from reoccurring. Failure to comply with TCEQ rules or the permit may subject the Applicant to enforcement action.

TCEQ's Office of Compliance and Enforcement ensures ongoing compliance with applicable state and federal regulations. As part of that responsibility, the Region 11 Office is required to conduct a mandatory comprehensive compliance investigation at the facilities. Additional mandatory investigations can be required if the facility is considered to be in significant noncompliance with its permit, which is determined by TCEQ's Compliance Monitoring Section and is based on self-reported effluent violations. If citizens observe any unauthorized discharges or other permit violations, the violations can be reported to the Region 11 Office at 512-339-3795. If the proposed facility is found to be out of compliance with the draft permit, the Applicant may be subject to enforcement action. Records relating to the facility are public record and may be accessed at TCEQ's main office at 12100 Park 35 Circle in Austin.

Furthermore, 30 TAC Chapter 319 outlines specific instances in which facility owners are required to notify members of the public in the event of unauthorized discharges as well as sanitary sewer overflows. Under 30 TAC § 319.302(b), the owner of a facility, through its responsible individual, must notify appropriate local government officials and the local media for spills regardless of volume, that the facility owner knows or has reason to know will adversely affect a public or private source of drinking water.

COMMENT 7:

Siva Vanga, Rajarajan Jagadesan, Manjunath Keetani, Srinivas Murthy, Rakesh Nuta, Jay K. Mehta, Vinod Vellanki, and Ben Wolff request a comprehensive environmental impact assessment study.

RESPONSE 7:

When Federal Agencies are considering whether to move forward with a federal project or action, the National Environmental Policy Act (NEPA) requires those federal agencies to integrate environmental values into their decision-making processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions. To meet this requirement, federal agencies must first prepare a detailed statement called an Environmental Assessment ("EA"), which includes the federal agency's Finding of No Significant Impact ("FONSI") or a finding that an Environmental Impact Statement ("EIS") is required. Executive Order 13186 directed executive departments and agencies to take certain actions to further

implement the Migratory Bird Treaty Act (16 U.S.C.703–711), the Bald and Golden Eagle Protection Acts (16 U.S.C. 668–668d), the Fish and Wildlife Coordination Act (16 U.S.C. 661–666c), the Endangered Species Act of 1973 (16 U.S.C. 1531–1544), the National Environmental Policy Act of 1969 (42 U.S.C. 4321–4347), and other pertinent statutes. The TPDES wastewater permitting process is a state process related to state action and does not involve compliance with NEPA, the requirements to perform an EA, and the resulting FONSI or EIS.

Furthermore, the Executive Director sent a copy of the draft permit to the EPA for review. The EPA approved the City of Liberty Hill draft permit (WQ0015000001) on April 29, 2024.

COMMENT 8:

The individuals in Attachment F expressed concern regarding the existing and recreational uses of the receiving stream. Several individuals comment that children and animals swim in the water near the facility site. Several individuals comment that the stream is used for kayaking.

RESPONSE 8:

The proposed permit was developed according to the TSWQS and the TCEQ IPs to be protective of water quality and maintain the recreational uses of the waterbodies in the route of the proposed discharge, provided that the Applicant operates and maintains the proposed facility according to TCEQ rules and the proposed permit's requirements.

According to the TCEQ Water Quality Standard's review, the unnamed tributary is intermittent, and Sowes Branch is intermittent with perennial pools. The Sowes Branch is in the Contributing Zone of the Edwards Aquifer, adjacent to the Recharge Zone. The designated uses for Segment No. 1251 are primary contact recreation, public water supply, aquifer protection, and high aquatic life use. The proposed permit considers recreational uses of each receiving water body during review. The receiving streams are presumed to have primary contact recreational uses which include swimming, boating, fishing, and incidental ingestion. Recreational uses are protected with a bacteria limit typically. The most stringent recommended bacteria limit for freshwater, using *E. coli*, is 126 CFU or MPN/100 mL for waters that have recreational uses.

COMMENT 9:

Randy Willis suggests looking at regional solutions including connecting to a different facility.

RESPONSE 9:

The Texas Legislature has directed TCEQ to consider regionalization when issuing TPDES permits. TWC § 26.0282 provides, “[i]n considering the issuance, amendment, or renewal of a permit to discharge waste, the commission may deny or alter the terms and conditions of the proposed permit, amendment, or renewal based on consideration of need, including the expected volume and quality of the influent and the availability of existing or proposed areawide or regional waste collection, treatment, and disposal systems not designated such by commission order. This section is expressly directed to the control and treatment of conventional pollutants normally found in domestic wastewater.” According to TWC § 26.081(a), TCEQ shall “encourage and promote the development and use of regional and area-wide waste collection, treatment, and disposal systems to serve the waste disposal needs of the citizens of the state and to prevent pollution and maintain and enhance the quality of the water in the state.”

To implement TCEQ’s regionalization requirements, Domestic Wastewater Permit Application Technical Report 1.1 requires applicants that are applying for a new or amended permit to provide information concerning local WWTFs. If there is a WWTF or collection system within three miles of the proposed facility, the applicant is required to provide information to the ED as to whether the nearby facility has sufficient existing capacity or is willing to expand its capacity to accept the additional volume of wastewater proposed in the application. If such a facility exists and is willing to accept the proposed wastewater, the applicant must provide an analysis of expenditures required to connect to that wastewater treatment facility. Additionally, the applicant is required to provide copies of all correspondence with the owners of any nearby existing facilities regarding connecting to their systems.

In Section 3 of Domestic Technical Report 1.1 in the application, the Applicant answered ‘No’ indicating there are no permitted WWTFs or collection systems located within a three-mile radius of this proposed facility, which can provide service to this

residential subdivision. ED staff's regionalization review also found that there is no constructed WWTP located within three miles radius of this proposed facility.

COMMENT 10:

The individuals listed in Attachment G expressed concern about the Applicant's compliance history. Several individuals are concern about a similar negligent situation to the City's other plant near the South San Gabriel River. Many individuals express concern that the Applicants won't comply with TCEQ standards.

RESPONSE 10:

The Executive Director reviews the compliance history for both the applicant and site for the five-year period prior to the date the permit application was received by TCEQ. During the technical review of the application, the TCEQ reviewed the City of Liberty Hill's compliance history according to the rules in 30 TAC Chapter 60. The compliance history includes multimedia compliance-related components about the site under review. These components include the following: enforcement orders, consent decrees, court judgments, criminal convictions, chronic excessive emissions events, investigations, notices of violations, audits and violations disclosed under the Audit Act, environmental management systems, voluntary on-site compliance assessments, voluntary pollution reduction programs and early compliance.

This permit renewal application was received after September 1, 2002, and the company and site have been rated and classified pursuant to 30 TAC Chapter 60. A company and site may have one of the following classifications and ratings:

1. a ***high performer classification***, has a rating of fewer than 0.10 points and is considered to have an above-satisfactory compliance record;
2. a ***satisfactory performer classification***, has a rating between 0.10 points to 55 points and is considered to generally comply with environmental regulations; or
3. an ***unsatisfactory performer classification***, has a rating above 55 points and is considered to perform below minimal acceptable performance standards established by the commission.⁴

⁴ 30 Tex. Admin. Code § 60. 2 (Compliance History Classification).

This site has a rating of 40.27 and a classification of satisfactory. The Santa Rita Upper Middlebrook WWTP facility must be operated by a chief operator or an operator holding a Class B (Interim I and II phases) and Class A (Final phase) license or higher.

COMMENT 11:

The individuals listed in Attachment H expressed concern regarding the plant's emergency protocols. These individuals asked what the emergency protocols are during large rainfalls and freezes, or during an accidents, spills, or malfunctions.

RESPONSE 11:

As provided by state law, a permittee is subject to administrative penalties for negligently or knowingly violating the Clean Water Act, Texas Water Code §§ 26, 27, and 28, and the Texas Health and Safety Code § 361, including but not limited to knowingly making any false statement, representation, or certification on any report, record, or other document submitted or required to be maintained under the draft permit, including monitoring reports or reports of compliance or noncompliance, or falsifying, tampering with or knowingly rendering inaccurate any monitoring device or method required by this permit or violating any other requirement imposed by state or federal regulations.⁵

The applicants will also be required to take certain steps to minimize the possibility of an accidental discharge of untreated wastewater from the treatment facility. For example, Operational Requirement No. 4 of the draft permit requires the applicants to maintain “adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failures by means of alternate power sources, standby generators, and/or retention of inadequately treated wastewater.” The applicants will also be required to comply with the requirements for emergency backup power found in 30 TAC Section 217.36 of the TCEQ's rules.

TPDES permits establish terms and conditions that are intended to provide water quality pollution control. Therefore, the ED's review of an application for a TPDES permit focuses on controlling the discharge of pollutants into water in the state. TCEQ does not have the authority to regulate flooding in the wastewater permitting process unless there is an associated water quality concern. The draft permit includes

⁵ The City of Liberty Hill Draft Permit, Monitoring and Reporting Requirements, Item 1, page 5.

effluent limits and other requirements that it must meet even during freezes, large rainfall events, and periods of flooding.

COMMENT 12:

The individuals listed in Attachment I expressed concern about the facility design. Several individuals noted that the design of the sewage intake is critical to ensure the effective collection and handling of raw sewage, thereby minimizing the risk of overflows and odor emission.

RESPONSE 12:

The application went through a thorough technical review during the permit drafting process. The application was technically complete and contained detailed schematics of the facility's treatment units in attachment I. Nothing in the application indicated the facility will fail to sufficiently treat domestic wastewater influent in compliance with the draft permit. The facility's design will undergo additional review upon permit issuance, when the applicants will be required to submit a summary transmittal letter under 30 TAC Section 217.6(d) of the TCEQ's rules that must include, among other things, a statement certifying that the treatment facility's plans and specifications substantially complying with the domestic treatment facility design requirements in 30 TAC Chapter 217. If requested by ED staff, the applicants must also submit the plans and specifications to the TCEQ Water Quality Plans and Specifications Team for an engineering review of the treatment units. Any deficiencies in the design and specifications will be addressed at that time. Under Other Requirement No. 6 in the draft permit, this process must be repeated for each phase of the permit.

The proposed permit would prohibit unauthorized discharge of wastewater or any other waste and includes appropriate requirements. For example, a permittee must maintain adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failures by means of alternate power sources, standby generators, or retention of inadequately treated wastewater.⁶ In addition, the plans and specifications for domestic sewage collection and treatment works associated with any domestic permit must be approved by TCEQ. All of these permit

⁶ 30 Tex. Admin. Code § 217.36.

provisions are designed to prevent unauthorized discharges of raw sewage. Except as allowed by 30 TACA § 305.132, The City of Liberty Hill will be required to report any unauthorized discharge to the TCEQ within 24 hours.⁷ Finally, The City of Liberty Hill will be subject to potential enforcement action for failure to comply with TCEQ rules. The issuance of this permit does not grant to the permittee the right to use private or public property for conveyance of wastewater along the discharge route described in this permit. This includes, but is not limited to, property belonging to any individual, partnership, corporation, or other entity. Neither does this permit authorize any invasion of personal rights nor any violation of federal, state, or local laws or regulations. It is the responsibility of the permittee to acquire property rights as may be necessary to use the discharge route. The permittee is required to build a wastewater collection system or treatment facility according to the plans and specifications approved by the ED and must ensure the proposed facility's plans and specifications meet all design requirements in the proposed permit. The proposed permit also requires the Applicant to "take all reasonable steps to minimize or prevent any discharge or sludge use or disposal or other permit violation that has a reasonable likelihood of adversely affecting human health."

Furthermore, the draft permit does not limit the ability of an individual to seek legal remedies against the applicant regarding any potential trespass, nuisance odors, or other cause of action in response to activities that may result in injury to human health or property or interfere with the normal use and enjoyment of property.

COMMENT 13:

The individuals listed in Attachment J expressed concern about human health. These individuals noted that the proposed facility would be located near homes and schools. Many individuals pointed out health risks including respiratory issues including asthma and other serious health conditions. Many individuals noted that the people nearby may be exposed to harmful chemicals and pollutants. Many individuals expressed additional concerns for children, the elderly, and those with preexisting health conditions including allergies. Several individuals comment that studies have

⁷ The City of Liberty Hill Draft Permit, Monitoring and Reporting Requirements, Item 7, page 7.

shown that sustained exposure to pollutants from WWTs can lead to chronic health problems in nearby populations.

RESPONSE 13:

The draft permit was developed to protect aquatic life, human health, and the environment in accordance with the TCEQ's Water Quality Standards as long as the applicant operates and maintains the facility according to TCEQ rules and the requirements in the draft permit.

The draft permit prohibits unauthorized discharges of wastewater or any other waste through various requirements. For example, Operational Requirement No. 1 states, "The permittee shall at all times ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. This includes, but is not limited to, the regular, periodic examination of wastewater solids within the treatment plant by the operator in order to maintain an appropriate quantity and quality of solids inventory as described in the various operator training manuals and according to accepted industry standards for process control. Process control, maintenance, and operations records shall be retained at the facility site, or shall be readily available for review by a TCEQ representative, for a period of three years." Under Operational Requirement No. 4, the applicant must maintain adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failures through alternate power sources, standby generators, or the retention of inadequately treated wastewater.⁸ Other Requirement No. 7 requires the applicant to submit a summary transmittal letter, and plans and specifications if requested by the ED, that demonstrate the treatment facility will meet the permit's effluent limits for each phase of the facility.⁹ These and other related permit provisions are designed to prevent unauthorized discharges of raw sewage.

The applicant's acceptance of the draft permit constitutes acknowledgement of and an agreement to comply with all terms and conditions embodied in the draft permit as well as the rules and orders of the Commission. In accordance with 30 TAC Section 305.125(9) of TCEQ's rules and Monitoring and Reporting Requirement No. 7 of the draft permit, the applicant must report to TCEQ any noncompliance that may

⁸ See also TEX. ADMIN. CODE § 217.36(i) (West 2021).

⁹ See also *id.* § 217.6(d).

endanger human health or safety or the environment. This information must be reported orally or by facsimile transmission to the TCEQ Region 11 Office at Austin within twenty-four hours of knowledge of the noncompliance. The applicant must also submit this information in writing to the Region 11 Office and TCEQ's Enforcement Division within five working days of knowledge of the noncompliance.

The applicant's compliance with the draft permit and TCEQ's rules regarding wastewater treatment facility design and operation will protect human health. However, if any unauthorized discharge or other permit violation is observed, the violation can be reported to TCEQ's Region 11 Office at Austin using the contact information listed in section I(C) above. Citizens may also gather data to show the applicant is not in compliance with TCEQ rules. For more information regarding citizen-collected evidence, please visit the TCEQ's webpage on the subject at <https://www.tceq.texas.gov/compliance/complaints/protocols>.

TCEQ is the state agency that is responsible for enforcing air pollution laws. Certain types of facilities have been found to not make significant contributions of air contaminants to the atmosphere. Such facilities are permitted by rule under the Texas Clean Air Act, found in chapter 382 of the Texas Health and Safety Code, and TCEQ air quality rules. Wastewater treatment facilities performing only the functions listed in section 106.532 of TCEQ's rules are permitted by rule. That includes domestic facilities, like the proposed facility in this case. Pursuant to section 382.057 of the Texas Health and Safety Code, the activities listed in 30 TAC Section 106.532 have been reviewed and determined not to make a significant contribution of air contaminants to the atmosphere. In its application, City of Liberty Hill indicated that the treatment process of the proposed wastewater treatment facility will consist of a MBR treatment system, which combines conventional biological activated sludge processes with membrane filtration. This treatment process will not make a significant contribution of air contaminants to the atmosphere pursuant to the Texas Health and Safety Code's (THSC) Texas Clean Air Act § 382.057 and § 382.05196 and is therefore permitted by rule.

Furthermore, the draft permit does not limit the ability of an individual to seek legal remedies against the applicant regarding any potential trespass, nuisance, or

other cause of action in response to activities that may result in injury to human health or property or interfere with the normal use and enjoyment of property.

COMMENT 14:

The individuals listed in Attachment K expressed their concern about odor.

RESPONSE 14:

All wastewater treatment facilities have the potential to generate odors. 30 TAC Section 309.13(e) of TCEQ's rules requires domestic wastewater facilities to control nuisance odor by complying with one of three options: 1) ownership of the buffer zone area; 2) restrictive easements from the adjacent property owners for any part of the buffer zone not owned by the applicant; or 3) providing nuisance odor control. According to its application, the Applicant intends to comply with the requirement to abate and control nuisance of odor by legal restrictions prohibiting the construction of residences within the buffer zone.¹⁰ This requirement is incorporated in the draft permit.¹¹ These legal restrictions may include an agreement with the adjacent landowner or some other form of restrictive easement in accordance with 30 TAC § 309.13(e)(3). Therefore, if this permit is issued, nuisance odor is not expected to occur as a result of the permitted activities at the facility if the permittee operates the facility in compliance with TCEQ's rules and the terms and conditions of the permit.

The applicant proposes in its application that the City of Liberty Hill wastewater treatment facility will consist of a membrane bioreactor (MBR) treatment system, which combines conventional biological activated sludge processes with membrane filtration. An MBR is a process which combines a microfiltration or ultrafiltration membrane unit with a suspended growth bioreactor and is now widely used in both municipal and industrial Wastewater Treatment Plants (WWTPs). When properly treated by the proposed wastewater treatment process, the effluent is not expected to have an offensive odor. If anyone experiences nuisance odor conditions or any other suspected incidents of noncompliance with the permit or TCEQ rules, they may be reported to TCEQ by calling the TCEQ Environmental Complaint Line at 1-888-777-3186. Calls will

¹⁰ The City of Liberty Hill Draft Permit Application, Administrative Report, 1.1, Item No. 2(b), page 2.

¹¹ The City of Liberty Hill Draft Permit, Other Requirements, Item No. 3, page 34.

be routed automatically to the closest TCEQ regional office. Complaints may also be filed online at tceq.texas.gov/compliance/complaints.

Moreover, the permit does not limit the ability of an individual to seek legal remedies against the Applicant regarding any potential trespass, nuisance, or other causes of action in response to activities that may result in injury to human health or property or that may interfere with the normal use and enjoyment of property.

COMMENT 15:

Cindy Moonsammy, Hemantha Kumar Chitturi, Amy Looper, Nathan Rudolph, and Brad Gorden expressed concern about public notice. They believe homeowners should have been notified beforehand and that there was not adequate notice to affected citizens.

RESPONSE 15:

There are two public notices regarding this permit action, the Notice of Receipt of Application and Intent to Obtain a Wastewater Permit (NORI), and the Notice of Application and Preliminary Decision (NAPD). TCEQ's notice rules require applicants to provide public notices for wastewater permits by publishing the NORI in a "newspaper of largest circulation in the county in which the facility is located or proposed to be located. If the facility is located or proposed to be located in a municipality, the applicant [must] publish notice in any newspaper of general circulation in the municipality."¹² After the Office of the Chief Clerk has mailed the preliminary decision and the NAPD to the applicant, they are required to publish the NAPD "at least once in a newspaper regularly published or circulated within each county where the proposed facility or discharge is located and in each county affected by the discharge."¹³

Additionally, TCEQ's notice rules for a new permit or major amendment require mailed notice of the NORI and NAPD to landowners named on the application map and persons on the mailing list maintained by the Office of the Chief Clerk.¹⁴ The applicant is required to submit a landowner map as part of the application materials. The landowner map must include the property boundaries of landowners surrounding the

¹² 30 TEX. ADMIN. CODE § 39.405(f)(1). *See generally* 30 Tex. Admin. Code §§ 39.405, 39.418, 39.419, and 39.551.

¹³ 30 TEX. ADMIN. CODE § 39.551(c)(1).

¹⁴ *See* 30 TEX. ADMIN. CODE §§ 39.413, 39.418, 39.419, and 39.551.

applicant's property and the property boundaries of all landowners surrounding the discharge point and on both sides of the discharge route for one full stream mile downstream of the discharge point. The City of Liberty Hill permit application is for a 'renewal without change' of an existing permit issued on March 21, 2019. There is no requirement for an applicant to notify landowners prior to submitting an application.

In accordance with TCEQ's notice rules, two public notices were published for the submitted application. The Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) was published on July 2, 2023, in the *Williamson County Sunday Sun*. The Notice of Application and Preliminary Decision (NAPD) was published on April 24, 2024, in the *Williamson County Sunday Sun*. The revised NORI, NAPD, and the Notice of Public Meeting were published on October 30, 2024, in the *Williamson County Sunday Sun*. Additionally, the notices were mailed to the individuals listed on the affected landowner list that was submitted by the Applicant with the application, and the permit application, Executive Director's preliminary decision, and draft permit were made available for viewing and copying at Liberty Hill Public Library, 355 Loop 332, Liberty Hill, Texas.

COMMENT 16:

The individuals listed in Attachment L expressed concern about the public disclosure of the facility. Many individuals state that the City of Liberty Hill, Williamson County, the Santa Rita Developers, and home builders provided no information about the WWTP prior the purchase of their home in Santa Rita Ranch. These individuals state that they should have been made aware of the facility much sooner. Many individuals note the lack of transparency and communication regarding the WWTP and it was a shock to them. Many note that this would have impacted them purchasing property in Santa Rita Ranch and that the lack of disclosure is unjust.

RESPONSE 16:

The public notice required for a TPDES permit is described in Response 15. Concerns about additional disclosures by the City of Liberty Hill or Santa Rita Ranch are outside the TCEQ's jurisdiction to address.

COMMENT 17:

The individuals listed in Attachment M expressed concern about the facility's location and recommended a new location. These individuals state that the facility should not be placed this close to schools and a residential area. Many individuals request the Applicant put the facility in a different location.

RESPONSE 17:

TCEQ does not have the authority to mandate a different discharge location or wastewater treatment plant location if the applicant's proposed location and discharge route comply with the TWC Chapter 26 and 30 TAC Chapter 309, relating to "Domestic Wastewater Effluent Limitations and Plant Siting." The TCEQ does not have jurisdiction over zoning.

If the City of Liberty Hill updates its application with a different location or a different discharge route, the Executive Director will reevaluate the discharge route to make sure that the draft permit contains appropriate limits and conditions for the revised discharge location or route. Additionally, new landowners may need to be notified of a change of the facility location or the discharge route.

The TCEQ's rules require a permit holder to establish buffer zones or an odor control plan for abating nuisance odor. Residential structures are prohibited within the parts of buffer zones not owned by the applicant. Other than for unaerated wastewater treatment units with anaerobic zones, treatment units require a buffer zone distance of 150 feet. Based on the application, the 150-foot distance would apply to all of the City of Liberty Hill's' treatment units.

Please refer to Response 5, addressing odor.

The scope of the TCEQ's jurisdiction does not affect or limit the ability of a landowner to seek relief from a court in response to activities that interfere with the landowner's use and enjoyment of their property. Under title 30, section 305.122(d) of the Texas Administrative Code, the issuance of a permit does not authorize any injury to persons or property, invasion of other property rights, or infringement of state or local laws. In addition, under title 30, sections 305.122(c) and 305.125(16) of the Texas Administrative Code, the issuance of a permit does not convey any property right or exclusive privilege. The proposed permit incorporates these rules into Permit

Condition No. 8, which states, “A permit does not convey any property rights of any sort, or any exclusive privilege.”

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with the terms of any permit or other environmental regulation by using the contact information provided above in section I.C. of this RTC. The TCEQ investigates all complaints received. If the City of Liberty Hill is found to be out of compliance with its permit, it will be subject to additional investigation and possible enforcement action.

COMMENT 18:

The individuals listed in Attachment N expressed concern about quality of life resulting from living near the WWTP. Many of these individuals note that it will disrupt the peaceful environment of their community.

RESPONSE 18:

The ED acknowledges the significance of these concerns; however, while the ED encourages the participation of all citizens in the environmental permitting process, there are certain concerns of citizens that the TCEQ cannot address in the review of a wastewater discharge permit, as the scope of the ED’s jurisdiction in a TPDES application is limited to the issues set out by statute.

The Texas Legislature has given the TCEQ the responsibility to protect water quality, and section 26.027 of the Texas Water Code authorizes the TCEQ to issue permits to control the discharge of wastes or pollutants into the state’s waters and to protect the water quality of the state’s rivers, lakes, and coastal waters. As discussed above, the proposed permit protects water quality according to the TCEQ rules and the Texas Water Code. According to the TCEQ rules, the plans and specifications of the plant design must comply with 30 TAC Chapter 217, relating to “Design Criteria for Domestic Wastewater Systems.” The Applicant is required at all times to ensure that the City of Liberty Hill facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. Consequently, health impacts from pests should not occur.

Additional protection of human health comes from the rule in 30 TAC § 309.3(g)(1) (Disinfection), which requires disinfection of domestic wastewater into

water in the state in a manner conducive to the protection of both public health and aquatic life. The rules do not mandate a specific method of disinfection, as a permittee may disinfect domestic wastewater through use of 1) chlorination, 2) ultra-violet light, or 3) an equivalent method of disinfection with prior approval from the ED. Whichever form is used, the design criteria for chemical disinfection by chlorine, including safety requirements, in 30 TAC Chapter 217, Subchapter K must be observed. Therefore, in accordance with the TCEQ rules (30 TAC § 309.3(g)(1)), the proposed permit requires the treated effluent to be disinfected prior to discharge in a manner conducive to protect both the public health and aquatic life.

COMMENT 19:

The individuals listed in Attachment O expressed concern about flooding, property values, aesthetics, nuisance sound, increased traffic, impact to local businesses, and/or PFAS.

RESPONSE 19:

Flooding

TCEQ does not have jurisdiction to regulate flooding in the context of a wastewater discharge permit. The permitting process is limited to controlling the discharge of pollutants into water in the state and protecting the water quality of the state's rivers, lakes and coastal waters. However, to the extent that an issue related to flooding also involves water quality, The City of Liberty Hill is required to comply with all the numeric and narrative effluent limitations and other conditions in the proposed permit at all times, including during flooding conditions. According to the application, the proposed facility is located above the 100-year flood plain. For additional protection, the proposed permit includes Other Requirement No. 5, which requires the permittee to provide protection for the facility from a 100-year flood.¹⁵

For flooding concerns, you can contact the local floodplain administrator for the area of concern, Williamson County Floodplain Management, at (512) 943-3330 or access its website at <https://www.wilcotx.gov/652/Floodplain-Management>. If you need help finding the local floodplain administrator, please call the TCEQ Resource Protection Team at (512) 239-4691. Additionally, the Federal Emergency Management

¹⁵ The City of Liberty Hill Draft Permit, Other Requirements, Item No. 5, page 34.

Agency and Texas Water Development Board have programs that are designed to mitigate damage caused by flooding. More information is available on the Board's website at <http://www.twdb.texas.gov/flood/index.asp>.

The ED notes that the draft permit does not limit the ability of nearby landowners to seek legal remedies from the applicant regarding any potential trespass, nuisance, or other cause of action in response to the proposed facility's activities that may result in injury to human health or property or interfere with the normal use and enjoyment of property.

Property Values, Nuisance Sound, Traffic, Impacts to Businesses

The TCEQ does not have jurisdiction under the Texas Water Code or its regulations to address or consider property values or the marketability of adjacent property when determining whether to approve or deny a permit application. Texas Water Code Chapter 26 and applicable wastewater regulations do not authorize the TCEQ to consider issues such as aesthetics, nuisance sound, increased traffic and impacts on local business. Additionally, the TCEQ does not have the authority to address concerns about the impact of the facility on the economy, businesses, tourism, or the resale of homes as part of the wastewater permitting process. The scope of the TCEQ's regulatory jurisdiction does not affect or limit the ability of a landowner to seek relief from a court in response to activities that interfere with landowner's use and enjoyment of his property.

Emerging Contaminants

Neither TCEQ nor EPA has promulgated rules or criteria limiting emerging contaminants or PFAS in wastewater. EPA is currently investigating emerging contaminants and PFAS and potential adverse human health effects from emerging contaminants and PFAS in the environment. Removal of some emerging contaminants has been documented during municipal wastewater treatment; however, standard removal efficiencies have not been established. In addition, there are currently no federal or state effluent limits for emerging contaminants or PFAS. Accordingly, neither the TCEQ nor the EPA has rules on the treatment of contaminants such as pharmaceuticals and PFAS in domestic wastewater.

III. CHANGES MADE TO THE DRAFT PERMIT IN RESPONSE TO COMMENTS:

The Executive Director made changes to the draft permit in response to comments No. 9. The facility must be operated by a chief operator or an operator holding a Class B (Interim I and II phases) and Class A (Final phase) license or higher.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel,
Executive Director

Charmaine Backens
Deputy Director
Environmental Law Division



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REPRESENTING THE EXECUTIVE DIRECTOR OF
THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

Attachment A – General Opposition

Bhanu Addanki
Rohan Reddy Ambati
Pavan Bachu
Lana R Blake
James Blake
Christina Caruso
Ashok Erugu
Murali Gogula
Genesis Gomez
Puneel Gutta
Mallory A Harwick
Mark Harwick
Sandra Hutchinson
Nathalia Joy Johnson
Krishna Kakarla
Kiran Kumar Kaukuntla
Sitarama Likith Koppaka
Nishitha Kotla
Srilakshmi Kudavalli Prakash
Akhil Kusa
Keith Lundquist
Sai Chand Mattapally
Cindy Moonsammy
Stephanie Ryder Morris
Kory Murphy
Sai Nadimpalli
Vimal Pradhan
Zanein Prater
Sree Harsha Ravilla
Sivanagaaditya Ravuri
Sachidananda Sahoo
Mohammed Muzamm Sargiro
Darrell Smith
Landon Smith
Hans Charles Suwinski
Vinutha Thokala
Yash Thota
Shashank Uppala
Naresh Vemula
Nagi Reddy Yelampalle

Attachment B – Water Quality

Bhanu Addanki
Rohan Reddy Ambati
Pavan Bachu
Lana R Blake
James Blake
Christina Caruso
Ashok Erugu
Murali Gogula
Genesis Gomez
Puneel Gutta
Mallory A Harwick
Mark Harwick
Sandra Hutchinson
Nathalia Joy Johnson
Krishna Kakarla
Kiran Kumar Kaukuntla
Sitarama Likith Koppaka
Nishitha Kotla
Srilakshmi Kudavalli Prakash
Akhil Kusa
Keith Lundquist
Sai Chand Mattapally
Cindy Moonsammy
Stephanie Ryder Morris
Kory Murphy
Sai Nadimpalli
Vimal Pradhan
Zanein Prater
Sree Harsha Ravilla
Sivanagaaditya Ravuri
Sachidananda Sahoo
Mohammed Muzamm Sargiro
Darrell Smith
Landon Smith
Hans Charles Suwinski
Vinutha Thokala
Yash Thota
Shashank Uppala
Naresh Vemula
Nagi Reddy Yelampalle

Attachment C - Groundwater

Janet and Michael Aguilar
Jesus G Alva
Nishanth Goud Athelli
Nerissa and Brent Bailey
Kathryn and Robert Bandas
Kevin Book
Victoria and David Boyer
Beth Carls
Jennifer and Wallie Ching
Shiva Chitikeshi
Charles and Michelle Cox
Lynda Decker
Cathy and Dennis Doescher
Nikki and Mike Dowd
Megan Dwight
Julie and Paul R. Epperson
Taylor Fallon
Beth Garrett
Adrienne and Anthony Gomez
Megan Hall
Sarah Havard
Beverly and Mike Heimstead
Gregory James
Corey Johnson
Sindhu Konkapaka
Ronald Latz
Rick Levitz
Claudia Loewenstein
Shaun Magruder
Tiffany Malzahn
Christine M. Martinez
Cara Massey
Brian Massey
Barbara and Randy Miller
James Randy Miller
Abigail and Josh Mings
Zee Nguyen
Renee Peyton
Bryan Primrose
Jackie Primrose
Nathan Rudolph
Anil Sahukari
Minnie Faye Sansom
Paul Stewart
Suzanne Stewart
Jessica Stewart Sierras
Gabrielle Stoney
Sujatha Suresh

Priya Vaddepally
Tanis Whitfield
Randy Willis
Ben and Janelle Wolff

Attachment D – Environmental Impacts

Bhanu Addanki
Lauren Adix
Janet and Michael Aguilar
Abhinay Sai Alishetty
Nerissa and Brent Bailey
Kathryn and Robert Bandas
Naveen Bandi
Ganesh Bankey
Megha Bhavale
Justin Black
Lana R Blake
Sukesh Bodavula
Kevin Book
Yash Boravelli
Nithesh Rao Boyanapally
Victoria and David Boyer
David Boyer
Hima Reddy Burri
Veena C.
Beth Carls
Heather Carmon
Arun Kumar Redd Challa
Naveen Challa
Jennifer and Wallie Ching
Hemantha Kumar Chitturi
David Corney
Charles and Michelle Cox
Murali Krishna Dechiraju
Lynda Decker
Cathy and Dennis Doescher
Cathy Doescher
Nikki and Mike Dowd
Megan Dwight
Julie and Paul R. Epperson
Taylor Fallon
Beth Garrett
Adrienne and Anthony Gomez
Karunakar Gunde
Puneel Gutta
Megan Hall
Hemant Hardas
Beverly and Mike Heimstead
Yaroslav Honcharuk
Rajarajan Jagadesan
Gregory James
Corey Johnson
Nathalia Joy Johnson
Anand K.

Suresh Kalatoor
Manjunath Keetani
Ratna Deep Kesani
Yamini Mounika Kollu
Sowmya Konanki
Sindhu Konkapaka
Aditya Koyyalamudi
Satish Krishnan
Ronald Latz
Tasha Le
Rick Levitz
Claudia Loewenstein
Amy Looper
Megha M.
Shaun Magruder
Nageshbabu Maile
Prabhakran Malairaju
Jay Malepat
Venkata Marella
Srikanth Maringanti
David Martin
Deanna B Martin
Cara Massey
Krishna Medavarapu
Jay K Mehta
Spoorthy Mendu
Barbara And Randy Miller
Abigail And Josh Mings
Nishok Mohan
Sushanth Mothukuri
Kory Murphy
Srinivas Murthy
Lalith Nallanagulagari
Saketh Nedunoori
Abhilash Neelam
David Neeld
Zee Nguyen
Abhishek Nimmakayala
Dinesh P.
K. P.
Jigar Patel
Tamara Patel
Jaime Peterson
Renee Peyton
Vimal Pradhan
Bryan Primrose
Jackie Primrose
Ajay Puthiyedath

Sadagopan Rajagopalan
Lakshmana Ramachandran
Sivanagaaditya Ravuri
Mounika Reddy
Pamela Roy-Kondepati
Anil Sahukari
Arun Balaji Sampath
Khanjan Saraiya
Pankaj K Sarma
Sai Suchithra Sathyakumar
Furqan Shaikh
Praveen Shivaprasad
Kumar Sing
Lakshman Siruvolu
Susan Marie Smith
Ankitkumar Solanki
Paul Stewart
Suzanne Stewart
Jessica Stewart Sierras
Shyja Sukumaran
Sujatha Suresh
Bhanu Shankar Tanneru
Krishna Teja Toomu
Shashank Uppala
Sarath Vakacharla
Venkata Jaya Ra Vakkalagadda
Siva Vanga
Giesel Velez
Vinod Vellanki
Venkatesh Khann Vellore Rajanbabu
Arun Vemireddy
Madhu Vidiyala
Rohit Vuppuluri
Tanis Whitfield
Randy Willis
Ben and Janelle Wolff
Nagi Reddy Yelampalle
Avinash Yeluri

Attachment E – Wildlife, Livestock, Aquatic Life, Habitats

Bhanu Addanki
Abhinay Sai Alishetty
Naveen Bandi
Ajithraj Bijady Shankaranarayana
Yash Boravelli
Nithesh Rao Boyanapally
Hima Reddy Burri
Arun Kumar Redd Challa
Sateesh Ganta
Ratna Deep Kesani
Sindhu Konkapaka
Nageshbabu Maile
Jay Malepat
Venkata Marella
Cara Massey
Nishok Mohan
Abhishek Nimmakayala
Dinesh P.
Jigar Patel
Tamara Patel
Bryan Primrose
Jackie Primrose
Lakshmana Ramachandran
Kumar Sing
Lakshman Siruvolu
Krishna Teja Toomu
Venkata Jaya Ra Vakkalagadda
Siva Vanga

Attachment F – Uses

Cathy Doescher
Julie and Paul R. Epperson
Sarah Havard
Tiffany Malzahn
Cara Massey
Brian Massey

Attachment G – Compliance History

Danielle G Alva
David Boyer
Bronson Buell
Beth Carls
Naveen Challa
David Corney
Cathy and Dennis Doescher
Cathy Doescher
Sarah Havard
Yaroslav Honcharuk
Venkata Sai Man Illendula
Nathalia Joy Johnson
Rajsekhar Konda
Matthew Lamkin
Ronald Latz
Claudia Loewenstein
Amy Looper
Preethi Malla
Christine M. Martinez
Brian Massey
Cara Massey
Patrick Mcdevitt
Bryan Primrose
Jackie Primrose
Nathan Rudolph
Darrell Smith
David Smith
Arjun Sridhar
Gabrielle Stoney
Randy T. Willis
Giesel Velez
Randy Willis
Naveen Yamparala

Attachment H – Emergency Protocol

Lauren Adix
Beth Carls
Megan Dwight
Louise Florence
Sindhu Konkapaka
Ronald Latz
Claudia Loewenstein
Jigar Patel
Ben and Janelle Wolff
Ben Wolff

Attachment I – Facility Design

Nerissa and Brent Bailey
Kathryn and Robert Bandas
Kevin Book
Victoria and David Boyer
Beth Carls
Jennifer and Wallie Ching
David Corney
Charles and Michelle Cox
Lynda Decker
Cathy and Dennis Doescher
Nikki and Mike Dowd
Beth Garrett
Adrienne and Anthony Gomez
Megan Hall
Beverly and Mike Heimstead
Gregory James,
Corey Johnson
Rick Levitz
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Shaun Magruder
Christine M. Martinez
James Randy Miller
Abigail and Josh Mings
Zee Nguyen
Jessica Sierras
Paul Stewart
Suzanne Stewart
Sujatha Suresh
Tanis Whitfield
Randy Willis

Attachment J – Human Health

Bhanu Addanki	Avinash Reddy Kambam
Lauren Adix	Srinivas Kandula
Abhinay Sai Alishetty	Manjunath Keetani
Danielle G Alva	Betzi Kelton
Christina Arrambide	Ratna Deep Kesani
Naveen Bandi	Sowmya Konanki
Chandu Bathineni	Rajsekhar Konda
Sadanand Bhat	Naresh Kondepati
Megha Bhavale	Sindhu Konkapaka
Ajithraj Bijady Shankaranarayana	Satish Krishnan
Lana R Blake	Praveen Kumar
Yash Boravelli	Divine Lakshmi
Nithesh Rao Boyanapally	Matthew Lamkin
David Boyer	Ronald Latz
Bronson Buell	Charles Le
Ashok Bungatavula	Tasha Le
Hima Reddy Burri	Claudia Loewenstein
Shravya Bussari	Amy Looper
Jeffrey Carmon	Prabhakran Malairaju
Arun Kumar Redd Challa	Jay Malepat
Naveen Challa	Preethi Malla
Gowri Shankar Mathur Chandrasekaran	Venkata Marella
Songhua Chen	David Martin
Hemantha Kumar Chitturi	Deanna B Martin
Kiran Cholleti	Christine M Martinez
Cathy and Dennis Doescher	Brian Massey
Cathy Doescher	Cara Massey
Akshith Donkanti	Jay K Mehta
Sandeep Duvvuru	Corey Beth Monarch-Gustilo
Mahidhar Reddy Dwaram	Sushanth Mothukuri
Julie and Paul R. Epperson	Kyla Murali
Surender Ganji	Kory Murphy
Sateesh Ganta	Srinivas Murthy
Sagnik Ghosh	Saketh Mysa
Trina Ghosh	Lalith Nallanagulagari
Rahul Gonuru	Amar Nath
Brad Gordon	Bhaskar Neella
Laxman Sandeep Gudur	Lakshmi Nemana
Puneel Gutta	Rakesh Nuta
Megan Hall	Dinesh P.
Anne Hankey	Srujana Parelly
Yaroslav Honcharuk	James Park
Venkata Sai Man Illendula	Jigar Patel
Rajarajan Jagadesan	Tamara Patel
Nathalia Joy Johnson	Jaime Peterson
Anand K.	Vimal Pradhan
Tejas Dhananjay Kadale	Bryan Primrose

Jackie Primrose
Binu Raj
Lakshmana Ramachandran
Sridhar Ramavarapu
Dharani Rangaraj
Sivanagaaditya Ravuri
Mounika Reddy
Allen Regehr
Pamela Roy-Kondepati
Anil Sahukari
Khanjan Saraiya
Kumar Sing
Lakshman Siruvolu
David Smith
Kosuri Sneha
Ankitkumar Solanki
Patrick M Spencer
Casi Stuchell
Shyja Sukumaran
Adriana Elrod Suwinski
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Nikil Teja Thota
Krishna Teja Toomu
Venkata Jaya Ra Vakkalagadda
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Vinod Vellanki
Venkatesh Khann Vellore Rajanbabu
Rohit Vuppuluri
Caroline Walker
Randy Willis
Ben and Janelle Wolff
Naveen Yamparala
Nagi Reddy Yelampalle

Attachment K - Odor

Abhinay Sai Alishetty
Danielle G Alva
Naveen Bandi
Ajithraj Bijady Shankaranarayana
Sukesh Bodavula
Yash Boravelli
David Boyer
Bronson Buell
Ashok Bungatavula
Hima Reddy Burri
Shravya Bussari
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Beth Carls
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Julie and Paul R. Epperson
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Sateesh Ganta
Genesis Gomez
Rahul Gonuru
Laxman Sandeep Gudur
Karunakar Gunde
Hemant Hardas
Yaroslav Honcharuk
Will Hutchinson
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Nathalia Joy Johnson
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Avinash Reddy Kambam
Preethi Kankanala
Bharath Karnati
Betzi Kelton
Ratna Deep Kesani
Yamini Mounika Kollu
Naga Kolukula
Naresh Kondepoti

Pradeep Konduru
Sindhu Konkapaka
Aditya Koyyalamudi
Praveen Kumar
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Matthew Lamkin
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Phani Bhushan R Maddikera
Nageshbabu Maile
Jay Malepat
Preethi Malla
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Srikanth Maringanti
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Krishna Medavarapu
Spoorthy Mendu
James Randy Miller
Kyla Murali
Kory Murphy
Cindy Nash
Saketh Nedunoori
Abhilash Neelam
David Neeld
Abhishek Nimmakayala
Dinesh P.
K. P.
Srujana Parelly
James Park
Jigar Patel
Tamara Patel
Bryan Primrose
Jackie Primrose
Ajay Puthiyedath
Binu Raj
Sadagopan Rajagopalan
Sridhar Ramavarapu
Sivanagaaditya Ravuri
Ryan Rebers
Sandeep Reddy
Daniel Rombola
Nathan Rudolph
Anil Sahukari
Khanjan Saraiya

Furqan Shaikh
Praveen Shivaprasad
Lakshman Siruvolu
David Smith
Arjun Sridhar
Gabrielle Stoney
Casi Stuchell
Sooraj Sudarsanakumar
Shyja Sukumaran
Sujatha Suresh
Hans Charles Suwinski
Adriana Elrod Suwinski
Randy T. Willis
Krishna Teja Toomu
Kristen Turk
Sarath Vakacharla
Venkata Jaya Ra Vakkalagadda
Giesel Velez
Arun Vemireddy
Madhu Vidiyala
Randy Willis
Naveen Yamparala
Nagi Reddy Yelampalle
Avinash Yeluri

Attachment L - Public Disclosure

Lauren Adix
Janet and Michael Aguilar
Jesus G Alva
Sukesh Bodavula
Sarah Bowers
David Boyer
Shravya Bussari
Veena C.
Beth Carls
Christina Caruso
Naveen Challa
Hemantha Kumar Chitturi
Murali Krishna Dechiraju
Akshith Donkanti
Nikki Dowd
Sandeep Duvvuru
Mahidhar Reddy Dwaram
Louise Florence
Surender Ganji
Murali Gogula
Brad Gordon
Karunakar Gunde
Puneel Gutta
Anne Hankey
Hemant Hardas
Swapna Hiray
Yaroslav Honcharuk
Mounika R Janagam
Nathalia Joy Johnson
Avinash Reddy Kambam
Manjunath Keetani
Yamini Mounika Kollu
Sowmya Konanki
Naresh Kondepati
Aditya Koyyalamudi
Satish Krishnan
Praveen Kumar
Divine Lakshmi
Ronald Latz
Benjamin Lawson
Claudia Loewenstein
Amy Looper
Megha M.
Chandra Sekhar Reddy Madduri
Prabhakran Malairaju
Srikanth Maringanti
David Martin

Deanna B Martin
Krishna Medavarapu
Jay K Mehta
Spoorthy Mendu
Sushanth Mothukuri
Kyla Murali
Srinivas Murthy
Vimalraj Muthu
Saketh Nedunoori
Rakesh Nuta
K. P.
Srujana Parelly
James Park
Jigar Patel
Ajay Puthiyedath
Binu Raj
Lakshmana Ramachandran
Sridhar Ramavarapu
Dharani Rangaraj
Mounika Reddy
Santosh Reddy Resu
Daniel Rombola
Anil Sahukari
Pankaj K Sarma
Sai Suchithra Sathyakumar
Jennifer Shaffer
Furqan Shaikh
Landon Smith
Ankitkumar Solanki
Patrick M Spencer
Arjun Sridhar
Sooraj Sudarsanakumar
Shyja Sukumaran
Hans Charles Suwinski
Adriana Elrod Suwinski
Randy T. Willis
Sarath Vakacharla
Anish Vedula
Vinod Vellanki
Arun Vemireddy
Madhu Vidiyala
Rohit Vuppuluri
Randy Willis
Ben and Janelle Wolff
Nagi Reddy Yelampalle
Avinash Yeluri

Attachment M – Facility Location

Bhanu Addanki	Yaroslav Honcharuk
Lauren Adix	Rajarajan Jagadesan
Abhinay Sai Alishetty	Nathalia Joy Johnson
Jesus G Alva	Anand K.
Nagendra Pavan Anganna	Suresh Kalatoor
Nishanth Goud Athelli	Avinash Reddy Kambam
Naveen Bandi	Srinivas Kandula
Ganesh Bankey	Preethi Kankanala
Sadanand Bhat	Betzi Kelton
Megha Bhavale	Ratna Deep Kesani
Kristen Biondi	Naga Kolukula
Justin Black	Rajsekhar Konda
Lana R Blake	Naresh Kondepati
James Blake	Sindhu Konkapaka
Yash Boravelli	Vamsi Kosuru
Sarah Bowers	Praveen Kumar
Nithesh Rao Boyanapally	Divine Lakshmi
David Boyer	Benjamin Lawson
Ashok Bungatavula	Charles Le
Hima Reddy Burri	Tasha Le
Shravya Bussari	Claudia Loewenstein
Beth Carls	Amy Looper
Jeffrey Carmon	Vijay M.
Heather Carmon	Jalan Macherla
Arun Kumar Redd Challa	Phani Bhushan R Maddikera
Naveen Challa	Nageshbabu Maile
Simhadri Chiramaneni	Jay Malepat
Shiva Chitikeshi	Nidhi Malik
Hemantha Kumar Chitturi	Venkata Marella
Rajesh Kumar Dasariraju	Srikanth Maringanti
Lynda Decker	David Martin
Cathy Doescher	Deanna B Martin
Nikki Dowd	Christine M. Martinez
Sandeep Duvvuru	Cara Massey
Mahidhar Reddy Dwaram	Brian Massey
Megan Dwight	Upender Meda
Laura Ellison	James Randy Miller
Julie and Paul R. Epperson	Abigail Mings
Ashok Erugu	Corey Beth Monarch-Gustilo
Surender Ganji	Cindy Moonsammy
Sateesh Ganta	Kyla Murali
Genesis Gomez	Kory Murphy
Brad Gordon	Lalith Nallanagulagari
Megan Hall	Jagadeesh Nallu
Anne Hankey	Cindy Nash
Sarah Havard	David Neeld
Beverly and Mike Heimstead	Bhaskar Neella
Swapna Hiray	Abhishek Nimmakayala

Dinesh P.
Srujana Parelly
James Park
Jigar Patel
Tamara Patel
Phani Bhushan Peddi
Jaime Peterson
Suraj Poojary
Bryan Primrose
Kishore Pulagam
Binu Raj
Sadagopan Rajagopalan
Lakshmana Ramachandran
Sridhar Ramavarapu
Dharani Rangaraj
Ryan Rebers
Sandeep Reddy
Allen Regehr
Santosh Reddy Resu
Daniel Rombola
Pamela Roy-Kondepati
Nathan Rudolph
Sachidananda Sahoo
Arun Balaji Sampath
Khanjan Saraiya
Pankaj K Sarma
Sai Suchithra Sathyakumar
Jennifer Shaffer
Dean Shirley
Praveen Shivaprasad
Susan Marie Smith
Kosuri Sneha
Patrick M Spencer
Gabrielle Stoney
Sooraj Sudarsanakumar
Shyja Sukumaran
Sujatha Suresh
Hans Charles Suwinski
Adriana Elrod Suwinski
Jozsef Szalay
Bhanu Shankar Tanneru
Krishna Teja Toomu
Kristen Turk
Shashank Uppala
Priya Vaddepally
Siva Vanga
Anish Vedula
Giesel Velez
Venkatesh Khann Vellore Rajanbabu
Andrea Whittaker

Randy Willis
Ben and Janelle Wolff
Nagi Reddy Yelampalle
Sai Yenumula

Attachment N – Quality of Life

Bhanu Addanki
Janet and Michael Aguilar
Abhinay Sai Alishetty
Danielle G Alva
Naveen Bandi
Chandu Bathineni
Yash Boravelli
David Boyer
Bronson Buell
Hima Reddy Burri
Shravya Bussari
Arun Kumar Redd Challa
Rajesh Kumar Dasariraju
Murali Krishna Dechiraju
Akshith Donkanti
Sandeep Duvvuru
Mahidhar Reddy Dwaram
Julie and Paul R. Epperson
Louise Florence
Surender Ganji
Sateesh Ganta
Rahul Gonuru
Laxman Sandeep Gudur
Karunakar Gunde
Sarah Havard
Swapna Hiray
Venkata Sai Man Illendula
Nathalia Joy Johnson
Krishna Kakarla
Avinash Reddy Kambam
Ratna Deep Kesani
Naresh Kondepoti
Sindhu Konkapaka
Aditya Koyyalamudi
Praveen Kumar
Divine Lakshmi
Matthew Lamkin
Ronald Latz
Tasha Le
Phani Bhushan R Maddikera
Nageshbabu Maile
Jay Malepat
Venkata Marella
Christine M Martinez
Patrick Mcdevitt
Rakesh Nuta
Dinesh P.
K. P.

Jigar Patel
Binu Raj
Lakshmana Ramachandran
Sridhar Ramavarapu
Sivanagaaditya Ravuri
Santosh Reddy Resu
Sai Suchithra Sathyakumar
Furqan Shaikh
Praveen Shivaprasad
Lakshman Siruvolu
David Smith
Arjun Sridhar
Casi Stuchell
Sooraj Sudarsanakumar
Shyja Sukumaran
Jozsef Szalay
Bhanu Shankar Tanneru
Krishna Teja Toomu
Venkata Jaya Ra Vakkalagadda
Giesel Velez
Arun Vemireddy
Naveen Yamparala
Nagi Reddy Yelampalle
Avinash Yeluri

Attachment O – Outside Juris

Bhanu Addanki
Lauren Adix
Janet and Michael Aguilar
Abhinay Sai Alishetty
Danielle G Alva
Nerissa and Brent Bailey
Kathryn and Robert Bandas
Naveen Bandi
Megha Bhavale
Ajithraj Bijady Shankaranarayana
Justin Black
Lana R Blake
Sukesh Bodavula
Kevin Book
Yash Boravelli
Nithesh Rao Boyanapally
Victoria and David Boyer
David Boyer
Bronson Buell
Ashok Bungatavula
Hima Reddy Burri
Shravya Bussari
Veena C.
Beth Carls
Jeffrey Carmon
Heather Carmon
Arun Kumar Redd Challa
Naveen Challa
Gowri Shankar Mathur Chandrasekaran
Jennifer and Wallie Ching
Kiran Cholleti
Charles and Michelle Cox
Rajesh Kumar Dasariraju
Murali Krishna Dechiraju
Lynda Decker
Cathy and Dennis Doescher
Cathy Doescher
Akshith Donkanti
Nikki and Mike Dowd
Nikki Dowd
Sandeep Duvvuru
Mahidhar Reddy Dwaram
Megan Dwight
Julie and Paul R. Epperson
Taylor Fallon
Louise Florence
Surender Ganji
Sateesh Ganta

Beth Garrett
Adrienne and Anthony Gomez
Rahul Gonuru
Brad Gordon
Laxman Sandeep Gudur
Karunakar Gunde
Megan Hall
Anne Hankey
Hemant Hardas
Sarah Havard
Beverly and Mike Heimstead
Swapna Hiray
Yaroslav Honcharuk
Venkata Sai Man Illendula
Rajarajan Jagadesan
Gregory James
Corey Johnson
Nathalia Joy Johnson
Suresh Kalatoor
Avinash Reddy Kambam
Bharath Karnati
Manjunath Keetani
Betzi Kelton
Ratna Deep Kesani
Yamini Mounika Kollu
Sowmya Konanki
Naresh Kondepati
Pradeep Konduru
Sindhu Konkapaka
Aditya Koyyalamudi
Satish Krishnan
Praveen Kumar
Divine Lakshmi
Matthew Lamkin
Ronald Latz
Benjamin Lawson
Tasha Le
Rick Levitz
Claudia Loewenstein
Amy Looper
Vijay M.
Megha M.
Phani Bhushan R Maddikera
Shaun Magruder
Nageshbabu Maile
Prabhakran Malairaju
Jay Malepat
Nidhi Malik

Preethi Malla
Deanna B Martin
Christine M. Martinez
Cara Massey
Patrick Mcdevitt
Krishna Medavarapu
Jay K Mehta
Spoorthy Mendu
Barbara and Randy Miller
Abigail and Josh Mings
Kyla Murali
Kory Murphy
Srinivas Murthy
Saketh Mysa
Lalith Nallanagulagari
Cindy Nash
Amar Nath
Saketh Nedunoori
Abhilash Neelam
David Neeld
Lakshmi Nemana
Zee Nguyen
Abhishek Nimmakayala
Dinesh P.
K. P.
Srujana Parelly
James Park
Jigar Patel
Tamara Patel
Phani Bhushan Peddi
Jaime Peterson
Renee Peyton
Bryan Primrose
Ajay Puthiyedath
Binu Raj
Sadagopan Rajagopalan
Lakshmana Ramachandran
Sridhar Ramavarapu
Sivanagaaditya Ravuri
Ryan Rebers
Mounika Reddy
Santosh Reddy Resu
Daniel Rombola
Pamela Roy-Kondepati
Nathan Rudolph
Minnie Faye Sansom
Khanjan Saraiya
Sai Suchithra Sathyakumar
Furqan Shaikh
Dean Shirley

Venkata Marella

Praveen Shivaprasad
Kumar Sing
Lakshman Siruvolu
David Smith
Ankitkumar Solanki
Arjun Sridhar
Paul Stewart
Suzanne Stewart
Jessica Stewart Sierras
Gabrielle Stoney
Casi Stuchell
Vinodkumar Subramaney
Sooraj Sudarsanakumar
Shyja Sukumaran
Sujatha Suresh
Jozsef Szalay
Nikil Teja Thota
Krishna Teja Toomu
Shashank Uppala
Sarath Vakacharla
Venkata Jaya Ra Vakkalagadda
Siva Vanga
Anish Vedula
Giesel Velez
Vinod Vellanki
Arun Vemireddy
Madhu Vidiyala
Rohit Vuppuluri
Tanis Whitfield
Randy Willis
Naveen Yamparala
Nagi Reddy Yelampalle
Avinash Yeluri