

TCEQ DOCKET NO. 2026-0183-MWD

APPLICATION BY  
GBRK EDGEWOOD LLC AND  
RUMMEL & ROHDE FARMS LTD.  
FOR NEW TPDES PERMIT  
NO. WQ0016601001

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BEFORE  
THE TEXAS  
COMMISSION ON  
ENVIRONMENTAL  
QUALITY

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EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS

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I. INTRODUCTION

The Executive Director (ED) of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Hearing Requests on the application by GRBK Edgewood LLC and Rummel & Rohde Farms LTD (Applicant) for new Texas Pollutant Discharge Elimination System (TPDES) permit No. WQ0016601001 (draft permit) that authorizes a discharge (proposed discharge) of treated domestic wastewater (effluent) into waters in the state.

II. ATTACHMENTS FOR COMMISSION CONSIDERATION

- Attachment A - ED's GIS Map and Appendix<sup>1</sup>

III. BACKGROUND

**A. *Application Request***

The application seeks authorization for the discharge of effluent from the North Fork Municipal Utility District Wastewater Treatment Facility (proposed facility) at daily average flow limits not to exceed 0.35 and 0.66 million gallons per day (MGD) in the Interim and Final phases, respectively. These flow limits are applicable to the proposed discharge, which is also subject to the Texas Surface Water Quality Standards (TSWQS) implemented by the Commission through the effluent limitations and conditions of the draft permit, which were established by staff in the ED's Water Quality Division (WQD Staff).

**B. *Description of the Proposed Facility and Discharge Route***

If constructed, the proposed facility will be located at 1051 County Road 369, Taylor, Texas 76574 (Williamson County). The application indicates the proposed facility will be an activated sludge process plant operated in the conventional mode with treatment units during the Interim Phase I consisting of two aeration basins, two final clarifiers, a sludge digester, and a chlorine contact chamber. During the Final phase, the treatment units consist of three aeration basins, three final clarifiers, two sludge digesters, and two chlorine contact chambers.

The route for the proposed discharge, as described in the application, is from the outfall, or discharge point, to North Fork Mustang Creek, thence to Mustang Creek, thence to Brushy Creek in Segment No. 1244 of the Brazos River Basin (Segment No. 1244).

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<sup>1</sup> The requesters' locations on the ED's GIS Maps are the locations of the physical addresses provided by the requesters in their applicable hearing requests.

The TSWQS, found in TCEQ’s rules at Title 30 of the Texas Administrative Code (30 TAC) Chapter 307, assign the water quality related uses (WQ uses) and designated aquatic life uses (ALUs) for Segment No. 1244 as primary contact recreation, public water supply, aquifer protection, and a “high” ALU designation. 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.

Table Nos. 1-2 below list the proposed limits and monitoring requirements of the draft permit. All flows, except the two-hour peak flow, are expressed in Million Gallons Per Day (MGD) or Gallons Per Day (GPD). The two-hour (2-hr) peak flow is expressed in Gallons Per Minute (GPM), and the word “minimum” is abbreviated with “min.” 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). The permit limits for for Five-Day Carbonaceous Biochemical Oxygen Demand, is abbreviated as “CBOD<sub>5</sub>”, Total Suspended Solids as “TSS,” Ammonia Nitrogen as “NH<sub>3</sub>-N,” and Total Phosphorus as “TP.”

**TABLE NO. 1 INTERIM PHASE I**

Parameter/ Pollutant	Daily Average		7-day Average	Daily Maximum	Single Grab
	mg/L	lbs/day	mg/L	mg/L	mg/L
Flow	0.035 MGD				
CBOD <sub>5</sub>	10.0	29.0	10.0	25.0	35.0
TSS	15.0	44.0	10.0	40.0	60.0
NH <sub>3</sub> -N	3.00	8.80	6.00	10.0	15.0
TP	1.00	3.00	2.00	4.00	6.00
<i>E. coli</i>	126		N/A	N/A	399
pH	Between 6.0-9.0 SU				

During Interim Phase I, the daily average effluent flow must not exceed 0.20 MGD, nor must the average discharge during any two-hour peak period exceed 550 GPM.

**TABLE NO. 2 FINAL PHASE**

Parameter/ Pollutant	Daily Average		7-day Average	Daily Maximum	Single Grab
	mg/L	lbs/day	mg/L	mg/L	mg/L
Flow	0.66 MGD				
CBOD <sub>5</sub>	10.0	55.0	10.0	20.0	30.0
TSS	15.0	83.0	10.0	20.0	30.0
NH <sub>3</sub> -N	3.00	17.0	5.00	10.0	15.0
TP	1.00	5.50	2.00	4.00	6.00
<i>E. coli</i>	126		N/A	N/A	399
pH	Between 6.0-9.0 SU				

During the Final Phase, the daily average effluent flow must not exceed 0.40 MGD, nor must the average discharge during any two-hour peak period exceed 1,110 GPM.

### C. Procedural History

The TCEQ received the application on August 19, 2024, and declared it administratively complete on September 26, 2024. The Applicant published the Notice of Receipt of application and Intent to Obtain a Water Quality Permit (NORI) in Williamson County, Texas in English in the *Williamson County Sun* on October 6, 2024, and in Spanish in *La Voz* on October 21, 2024. On October 16, 2024, TCEQ's Chief Clerk's Office (CCO) received a public meeting request from Texas State Representative Caroline Harris Davila, which the ED approved and scheduled for May 20, 2025. The ED completed the technical review of the application on March 7, 2025, and prepared the draft permit, which if approved, would establish the conditions under which the proposed facility must operate. On April 13, 2025, the Applicant, in Williamson County, Texas, published in English in the *Williamson County Sun* a Combined NORI and Notice of Application and Preliminary Decision (NAPD) and Notice of Public Meeting (NOPM) to correct the facility location as published in the NORI and to publish the NOPM to the public. The Spanish version of the Combined NORI-NAPD-NOPM was published in *La Voz* on April 10, 2025. The public meeting was held on May 20, 2025, at the Williamson County Exposition Center in Taylor, Texas. The time for the public to comment and request a hearing on the application ended on May 20, 2025, and December 1, 2025, respectively.

This application was declared administratively complete after September 1, 2015; therefore, the 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 TCEQ in its rules in 30 TAC Chapters 39, 50, and 55. The Texas Legislature enacted SB 709 (*Eff.* September 1, 2015) amending the requirements for comments and contested case hearings. This application is subject to those changes in the law.


TCEQ's CCO received timely Hearing requests (Requests) from Eric Allmon for Wilson Springs Prairie LP & Edward Griffith (WSPLP & EG), Sara Thornton for the City of Taylor (Taylor), and Nathan Vassar for Terrell Timmermann Farms LP (TTFLP).

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

Please see below the applicable rules and regulations for TCEQ permits:

- All administrative rules: Secretary of State Website: [www.sos.state.tx.us](http://www.sos.state.tx.us)
- TCEQ rules: Title 30 of the Texas Administrative Code: [www.sos.state.tx.us/tac/](http://www.sos.state.tx.us/tac/)
- (select TAC Viewer on the right then Title 30 Environmental Quality) Texas statutes: [www.statutes.capitol.texas.gov](http://www.statutes.capitol.texas.gov)
- TCEQ website: [www.tceq.texas.gov](http://www.tceq.texas.gov) (for downloadable rules in WordPerfect or Adobe PDF formats select "Rules Policy & Legislation" then "Current TCEQ Rules" then "Download TCEQ Rules");
- Federal rules: Title 40 of the Code of Federal Regulations (C.F.R.) [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl)
- Federal environmental laws: <http://www.epa.gov/lawsregs/>

For information about this permit application or the permitting process please contact TCEQ's Public Education Program at (800) 687-4040 or the website below.

**Para ver la versión en español del sitio web de TCEQ, vaya a la página de inicio y busque en la esquina superior derecha lo siguiente:  [ESPAÑOL](#)**

Para obtener información sobre cómo participar en el proceso de permisos para aguas residuales, comuníquese con el Programa de Educación Pública de la TCEQ por teléfono al (800) 687-4040 o a través del sitio web que aparece a continuación. Para acceder al enlace, primero seleccione la versión en español del sitio web y luego haga clic enlace.

- <https://www.tceq.texas.gov/agency/decisions/participation/permitting-participation>

El aviso de idioma alternativo en español está disponible en la página web a continuación. Para acceder al enlace, primero seleccione la versión en español del sitio web y luego haga clic enlace.

- [www.tceq.texas.gov/permitting/wastewater/plain-language-summaries-and-public-notices](http://www.tceq.texas.gov/permitting/wastewater/plain-language-summaries-and-public-notices)

Commission records for the proposed facility are available for viewing and copying at TCEQ's central office in Austin 12100 Park 35 Circle Building F 1st Floor (CCO) for the current application until final action is taken. Some documents located in CCO may also be found in the Commissioners' Integrated Database.

- [www.tceq.texas.gov/goto/cid](http://www.tceq.texas.gov/goto/cid)

TCEQ's rules require Applicants to make a copy of the administratively complete application available for viewing by the public in a specified location within the county in which the facility is located.<sup>2</sup> The Applicant did this by placing the required copy at the Taylor Public Library, located at 801 Vance Street, Taylor, Texas 76574, which is in Williamson County. Likewise, in addition to the copy of the application, the final permit application, the draft permit, the statement of basis/technical summary and the ED's preliminary decision have been available for viewing and copying at the same location since the publication of the Combined NORI-NAPD

The ED has determined that the proposed permit, which establishes the conditions under which the proposed facility must operate, if issued, meets all statutory and regulatory requirements and is protective of the environment, water quality and human health. However, if individuals wish to file a complaint about the proposed facility concerning its compliance with the provisions of its permit or with TCEQ rules the TCEQ's Office of Compliance and Enforcement (OCE) should be contacted. The TCEQ Regional OCE Office in Austin, Texas (Region 11) may be contacted at (512) 339-2929 or the statewide toll-free number at 1-888-777-3186 to address potential permit violations. In addition, complaints may be filed electronically through the link to the TCEQ's compliance website below or sending an email to:

- [complaint@TCEQ.Texas.gov](mailto:complaint@TCEQ.Texas.gov).
- [www.tceq.texas.gov/compliance/complaints](http://www.tceq.texas.gov/compliance/complaints)

If an inspection by the TCEQ finds that the Applicant is not complying with all requirements of the proposed permit or that the proposed facility is out of compliance with TCEQ rules, enforcement actions may arise.

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<sup>2</sup> 30 TAC § 39.405(g).

## V. EVALUATION OF HEARING REQUESTS

Because the application was received after September 1, 2015, and declared administratively complete after September 1, 1999, it is subject to both the procedural requirements adopted pursuant to House Bill 801 (HB-801), 76th Legislature, 1999, and requirements of Senate Bill 709 (SB-709), 84th Legislature, 2015, which are implemented through the TCEQ rules in 30 TAC Chapters 39, 50, and specifically 55, the TCEQ's Contested Case Hearing rules.

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment and the Commission's consideration of hearing requests (Requests). The Commission implemented HB 801 by adopting procedural rules in 30 TAC chapters 39, 50, and 55. Senate Bill 709 revised the requirements for submitting public comment and the commission's consideration of Hearing Requests.

### ***A. Legal Authority to Respond to Hearing Requests***

The ED may submit written responses to requests. Responses to hearing requests must specifically address:

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

### ***B. Hearing Request Requirements***

To consider a request, the Commission must first conclude that the requirements of the TCEQ's Contested Case Hearing rules found at 30 TAC §§ 55.201 and 55.203, are met as follows.

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

A hearing request must substantially comply with the following:

- (1) give the name, address, telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who is responsible for receiving all official communications and documents for the group;
- (2) identify the person's justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the

requestor's location and distance relative to the facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the facility or activity in a manner not common to members of the general public;

(3) request a contested case hearing;

(4) for applications filed;

(B) on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, list any disputed issues of law; and

(5) provide any other information specified in the public notice of application.

### ***C. Provisions for Affected-Person Status***

To grant a contested case hearing request, the commission must determine, pursuant to the TCEQ's Contested Case Hearing rules, that a requestor is an "affected person" according to the provisions of 30 TAC § 55.203.

(a) For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the public does not qualify as a personal justiciable interest.

(b) Governmental entities, including local governments and public agencies with authority under state law over issues raised by the application may be considered affected persons.

(c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:

(1) whether the interest claimed is one protected by the law under which the application will be considered;

(2) distance restrictions or other limitations imposed by law on the affected interest;

(3) whether a reasonable relationship exists between the interest claimed and the activity regulated;

(4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;

(5) likely impact of the regulated activity on use of the impacted natural resource by the person; and

(6) whether the requestor timely submitted comments on the application which were not withdrawn; and

(7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

(d) In making this determination, the commission may also consider, to the extent consistent with case law:

- (1) the merits of the underlying application and supporting documentation in the commission's administrative record, including whether the application meets the requirements for permit issuance;
- (2) the analysis and opinions of the ED; and
- (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.

#### ***D. Referral to the State Office of Administrative Hearings***

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

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

#### ***E. Requests for Reconsideration***

TCEQ's Contested Case Hearing rules state that any person may file a Request for Reconsideration (RFR) of the ED's decision no later than 30 days after TCEQ's CCO mails the ED's decision and Response to Comments (RTC). According to TCEQ's Contested Case Hearing rules found at 30 TAC § 55.201(e), the RFR must be in writing, timely filed with CCO, and expressly state that the person is requesting reconsideration of the ED's decision and give the reasons why the decision should be reconsidered.

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

For this application the period for the public to file comments on the application ended on May 20, 2025, the ED's RTC and Final Decision letter was mailed on October 31, 2025, and the period for filing a Hearing Request (request) or a Request for Reconsideration (RFR) ended on December 1, 2025. The ED's analyses below determined whether the requests submitted on the application conformed with TCEQ rules, if the requester qualified as an affected person, the issues to be referred for a possible hearing, and the length of any hearing. As stated above, TCEQ's CCO TCEQ's Office of the Chief Clerk (OCC) received timely Requests from Eric Allmon for Wilson Springs Prairie LP & Edward Griffith (WSPLP & EG), Sara Thornton for the City of Taylor (Taylor), and Nathan Vassar for Terrell Timmermann Farms LP (TTFLP).

#### ***A. Whether the requests comply with TCEQ's rules at 30 TAC § 55.201(c).***

**TTFLP** – Filed timely, written Requests that provided the requisite contact information, raised issues that form the basis of its Requests in timely comments not withdrawn before the RTC was filed, and requested a hearing.

The ED recommends finding that the Requests of TTFLP substantially complied with 30 TAC § 55.201(c).

**WSPLP & EG** – Filed timely, written Requests that provided the requisite contact information, raised issues that form the basis of its Requests in timely comments not withdrawn before the RTC was filed, and requested a hearing.

The ED recommends finding that the Requests of WSPLP & EG substantially complied with 30 TAC § 55.201(c).

**Taylor** – Filed timely, written Requests that provided the requisite contact information, raised issues that form the basis of its Requests in timely comments not withdrawn before the RTC was filed, and requested a hearing.

The ED recommends finding that the Requests of Taylor substantially complied with 30 TAC § 55.201(c).

***B. Whether the Requests comply with TCEQ's rules at 30 TAC § 55.201(d).***

**TTFLP** – The Requests of TTFLP complied with 30 TAC § 55.201(d) because the Requests effectively identified a personal justiciable interest in the application through brief, but specific, plain language explanations about the requester's location and distance relative to the proposed facility and why the requester believes it will be adversely affected by the proposed facility or its operation in a manner not common to members of the general public.

The Requests of TTFLP explained that the proposed facility would be in proximity to its property, which increases the likelihood that TTFLP may be affected in way not common to the public, and raised relevant and material considerations to a decision on the application that were the subject of TTFLP timely comments on the application, including water quality concerns, whether the draft permit complies with TCEQ's antidegradation policy, potential nuisance odors from the proposed facility, whether the application was complete and accurate, and whether the proposed facility is in violation of TCEQ's Regionalization policy.

The ED recommends finding that the Requests of TTFLP substantially complied with 30 TAC § 55.201(d).

**WSPLP & EG** – The Requests of WSPLP & EG complied with 30 TAC § 55.201(d) because the Requests effectively identified a personal justiciable interest in the application through brief, but specific, plain language explanations about the requester's location and distance relative to the proposed facility and why the requester believes it will be adversely affected by the proposed facility or its operation in a manner not common to members of the general public.

The Requests of WSPLP & EG explained that the proposed facility would be in proximity to its property, which increases the likelihood that WSPLP & EG may be affected in way not common to the public, and raised relevant and material considerations to a decision on the application that were the subject of WSPLP & EG timely comments on the application, including water quality impacts, whether the draft permit complies with TCEQ's antidegradation policy, potential nuisance odors from the proposed facility, whether the application was complete and accurate, and whether the proposed facility is in violation of TCEQ's Regionalization policy.

The ED recommends finding that the Requests of WSPLP & EG substantially complied with 30 TAC § 55.201(d).

**Taylor** – The Requests of Taylor failed to comply with 30 TAC § 55.201(d) because the Requests failed to identify a personal justiciable interest in the application.

While the Requests of Taylor may have appeared to raise relevant and material considerations to a decision on the application, such as regionalization, the Requests of Taylor acknowledge that the location of the proposed facility is barely "outside the

city's service area," and is not within Taylor's corporate limits or its ETJ. These facts decrease the likelihood that Taylor may be affected in way not common to the public.

The ED recommends finding that the Requests of Taylor did not substantially comply with 30 TAC § 55.201(d).

***C. Whether the Requestor is an Affected Person under 30 TAC § 55.203.***

**TTFLP** - The Requests of TTFLP effectively identified a personal, justiciable interest affected by the application. The Requests of TTFLP stated that the proposed facility is in proximity to its property, which the GIS Map and its Appendix prepared by the ED's staff confirmed as accurate, as its distances to relevant features of the proposed facility measure 0.42 miles to the facility, outfall, and discharge route.

Additionally, the Requests of TTFLP raised relevant concerns including water quality concerns, whether the draft permit complies with TCEQ's antidegradation policy, potential nuisance odors from the proposed facility, whether the application was complete and accurate, and whether the proposed facility is in violation of TCEQ's Regionalization policy. All of which were the subject of their timely comments on the application. These issues are related to the interests of the requester, demonstrating a reasonable relationship between the interests claimed and the activity regulated, which also increases the likelihood that TTFLP may be affected in a way not common to the public

The ED recommends that the Commission find that TTFLP is an Affected Person under 30 TAC § 55.203.

**WSPLP & EG** - The Requests of WSPLP & EG effectively identified a personal, justiciable interest affected by the application. The Requests of WSPLP & EG stated that the proposed facility is in proximity to its property, which the GIS Map and its Appendix prepared by the ED's staff confirmed as accurate, as its distances to relevant features of the proposed facility measure 0.18 miles to the facility, 0.19 miles to the outfall, and 0.04 miles to the discharge route, which WSPLP & EG's property is along.

Additionally, the Requests of WSPLP & EG raised relevant concerns including water quality concerns, whether the draft permit complies with TCEQ's antidegradation policy, potential nuisance odors from the proposed facility, whether the application was complete and accurate, and whether the proposed facility is in violation of TCEQ's Regionalization policy. All of which were the subject of their timely comments on the application. These issues are related to the interests of the requester, demonstrating a reasonable relationship between the interests claimed and the activity regulated, which also increases the likelihood that WSPLP & EG may be affected in a way not common to the public

The ED recommends that the Commission find that WSPLP & EG is an Affected Person under 30 TAC § 55.203.

**Taylor** - For requests from governmental entities like Taylor to be granted and found affected, the requests must identify issues that Taylor has statutory authority over or interests in. Taylor's Requests explained that the corporate boundaries of the city are near the proposed facility but not within it limits, its ETJ limits, nor its wastewater service area. The GIS map prepared by the ED's staff confirms that none of Taylor's limits include the location of the proposed facility.

The Requests of Taylor raised potentially relevant issues related to Regionalization, as Taylor has its own TPDES permitted facility that it states is within three miles of the

proposed facility. However, Taylor's claim to affectedness rests entirely on an interest in the Regionalization policy of Texas being implemented correctly. However, Taylor's Requests acknowledge that the proposed facility is barely "outside the city's service area." Moreover, Taylor has no statutory authority over Regionalization, and the location for the proposed facility is not within Taylor's corporate limits, its ETJ, nor does Taylor have a wastewater CCN that the facility is within. Because of these facts, Taylor's Regionalization interest does not rise to the level of a personal justiciable interest and does not demonstrate that a reasonable relationship between the interests claimed and the activity regulated.

The ED recommends that the Commission find that Taylor is not an Affected Person under 30 TAC § 55.203.

#### VII. ISSUES RAISED IN THE HEARING REQUESTS:

The following issues were raised in the hearing requests that the ED recommends the Commission grant.

**1. Whether the draft permit's nuisance odor provisions comply with the applicable TCEQ rules.**

(RTC Response No. 4) This is an issue of fact which, if shown to be factually accurate, would be relevant and material to a decision on the application.

**2. Whether the draft permit is protective of surface and groundwater quality in compliance with the TSWQS in 30 Texas Administrative Code, Chapter 307 and TCEQ's antidegradation policy.**

(RTC Response Nos. 1 & 2) This is an issue of fact which, if shown to be factually accurate, would be relevant and material to a decision on the application.

**3. Whether the Commission should deny or alter the terms of the draft permit based on consideration of need under Texas Water Code § 26.0282 and the general policy to promote regional or area-wide systems under § 26.081.**

(RTC Response No. 7) This is an issue of fact which, if shown to be factually accurate, would be relevant and material to a decision on the application.

**4. Whether the application is deficient and the draft permit is based on incomplete information.**

(RTC Response No. 3) This is an issue of fact which, if shown to be factually accurate, would be relevant and material to a decision on the application.

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

#### VIII. CONTESTED CASE HEARING DURATION

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

#### IX. REQUESTS FOR RECONSIDERATION

On behalf of TTFLP, an RFR was filed. However, the RFR failed to raise any new information for the ED to analyze. Therefore, the ED recommends denying the RFR.

X. EXECUTIVE DIRECTOR'S RECOMMENDATION

The ED recommends the following actions by the Commission:

1. Find that TTFLP and WSPLP & EG are affected persons under 30 TAC § 55.203(c).
2. Grants the Requests of TTFLP and WSPLP & EG and deny all others.
3. Deny the RFR filed on behalf of TTFLP.
4. Should the Commission decide to refer this case to SOAH:
  - a. refer the case to Alternative Dispute Resolution for a reasonable time; and
  - b. refer the issues identified in section VII (1)-(4) above to SOAH for a contested case hearing.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel, *Executive Director*

Phillip Ledbetter, *Director*  
Office of Legal Services

Amy L. Browning, *Acting Deputy Director*  
Environmental Law Division



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Michael T. Parr II, Staff Attorney  
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REPRESENTING THE EXECUTIVE DIRECTOR  
OF THE TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

**CERTIFICATE OF SERVICE**

I certify that on March 9, 2026, the Executive Director's Response to Hearing Requests for TCEQ Permit No. WQ0016601001 was filed with the Texas Commission on Environmental Quality's Office of the Chief Clerk.

A handwritten signature in black ink, appearing to read "Michael T. Parr II". The signature is written in a cursive style with a horizontal line extending from the end of the name.

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Michael T. Parr II, *Staff Attorney*  
State Bar No. 24062936

MAILING LIST

GRBK Edgewood LLC and Rummel & Rohde Farms Ltd.  
TCEQ Docket No./TCEQ Expediente N.º 2026-0183-MWD  
TPDES Permit No./TPDES Permiso N.º WQ0016601001

FOR THE APPLICANT/PARA EL SOLICITANTE

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FOR PUBLIC INTEREST COUNSEL/PARA ABOGADOS DE INTERÉS PÚBLICO

via electronic mail/vía correo electrónico:

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

FOR ALTERNATIVE DISPUTE RESOLUTION/PARA LA RESOLUCIÓN ALTERNATIVA DE DISPUTAS

via electronic mail/vía correo electrónico:

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

FOR THE CHIEF CLERK/PARA LA SECRETARIA OFICIAL

via eFilings:

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

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

REQUESTERS/SOLICITANTES

See attached list/Ver listado adjunto.

REQUESTERS/SOLICITANTES

Allmon, Eric  
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1206 San Antonio St  
Austin Tx 78701-1834

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Thornton, Sara R  
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Vassar, Nathan E  
Lloyd Gosselink Rochelle & Townsend PC  
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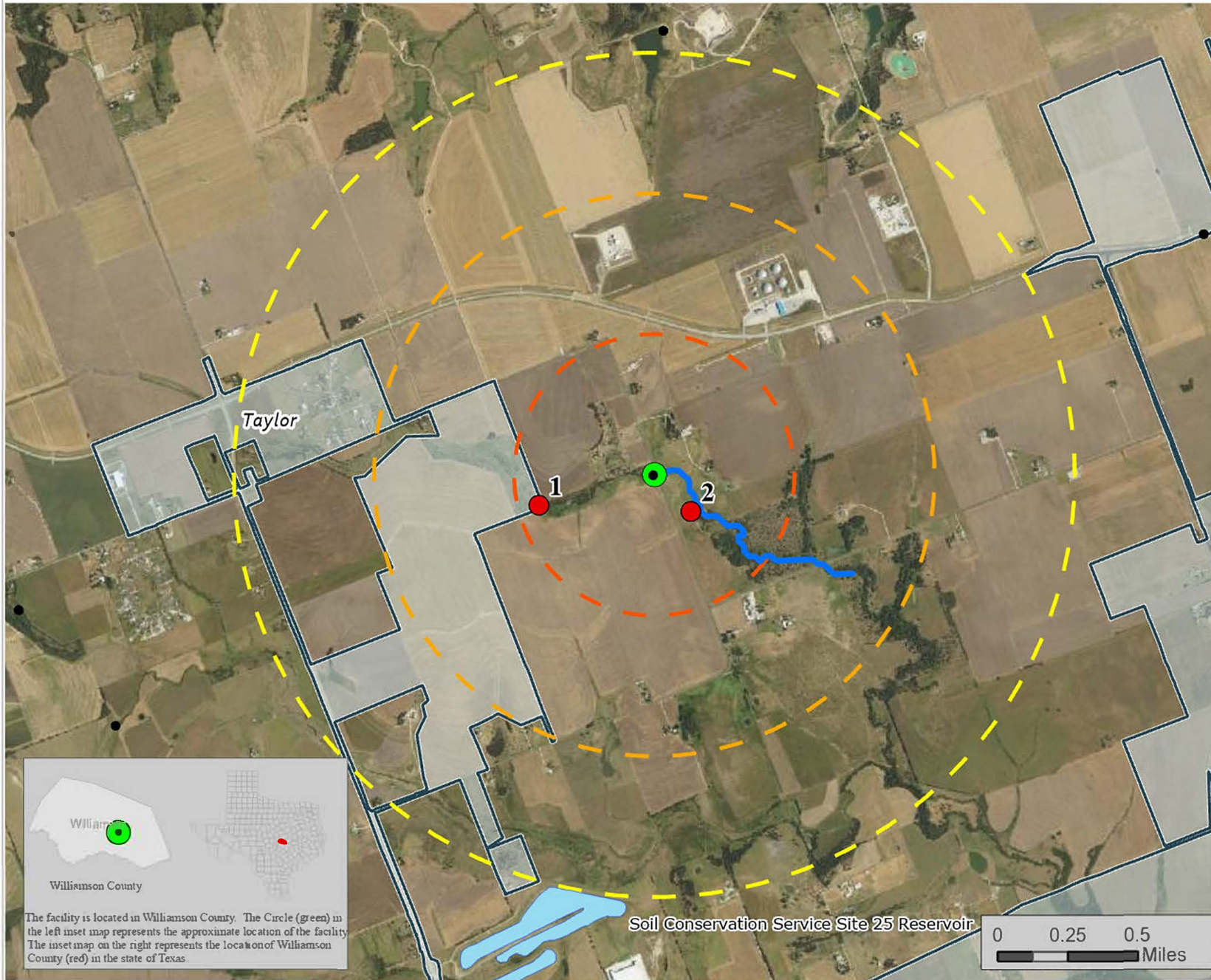
# Attachment A

# GRBK Edgewood LLC and Rummel & Rhode Farms Ltd. GIS MAP (WQ0016601001)



Protecting Texas by  
Reducing and  
Preventing Pollution

Texas Commission on Environmental Quality  
GIS Team (Mail Code 197)  
P.O. Box 13087  
Austin, Texas 78711-3087  
Date: 2/18/2026  
CRF 0135060  
Cartographer: AProvenc

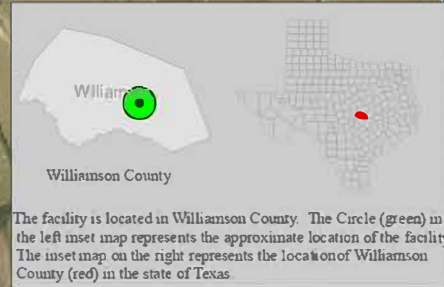


- Outfall
- Facility Point
- Requestors
- 1 Mile Discharge Route
- ▭ City of Taylor
- ▭ 0.5 Mile Radius
- ▭ 1.0 Mile Radius
- ▭ 1.5 Mile Radius
- ▭ Lake/Pond

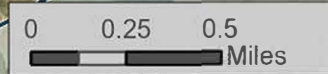
Distances between Requestors, Outfall, Discharge Route and Facility Point are shown in miles in the accompanying Appendix.

Source: This map was requested by the Office of Legal Services (OLS) and is based on information provided in the application and hearing requests. The applicant provided site location information and the hearing requestors provide physical addresses. The map is a visual representation and approximation.

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



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



# Appendix for GRBK Edgewood LLC and Rummel & Rhode Farms Ltd. GIS Map (WQ0016601001)

Map #	Requester	Latitude	Longitude	Distance in miles to:		
				Facility	Outfall	Discharge Route
1	Terrell Timmermann Farms LP	30.597451	-97.485828	0.42	0.42	0.42
2	Wilson Springs Prairie LP and Edward Griffith	30.596952	-97.476741	0.18	0.19	0.04
3	City of Taylor			0.41	0.40	0.40