

**Tammy Washington**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, September 8, 2025 4:31 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0016517001  
**Attachments:** 2025.09.25 Comment Letter to TCEQ re Liberty Hill TPDES Permit Application.pdf

PM  
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**From:** pstarkie@jw.com <pstarkie@jw.com>  
**Sent:** Monday, September 8, 2025 3:45 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0016517001

**REGULATED ENTY NAME** 183 258 LIBERTY HILL WWTP

**RN NUMBER:** RN111949236

**PERMIT NUMBER:** WQ0016517001

**DOCKET NUMBER:**

**COUNTY:** WILLIAMSON

**PRINCIPAL NAME:** 183 258 LIBERTY HILL LLC

**CN NUMBER:** CN606248698

**NAME:** Ali Abazari

**EMAIL:** [pstarkie@jw.com](mailto:pstarkie@jw.com)

**COMPANY:** Jackson Walker LLP

**ADDRESS:** 100 Congress Avenue Suite 1100  
Austin, TX 78701

**PHONE:** 5122362239

**FAX:**

**COMMENTS:** Comments, Request for Public Meeting, and Request for Contested Case Hearing on the Application of Liberty Hill 183 WWTP, TPDES Permit No. WQ0016517001

## HOLMES 29 LLC

3616 Far West Boulevard, Suite 117-314  
Austin, TX 78731

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

### VIA ELECTRONIC FILING

### **Re: Comments, Request for Public Meeting, and Request for Contested Case Hearing on the Application of Liberty Hill 183 WWTP, TPDES Permit No. WQ0016517001**

Dear Ms. Gharis:

Holmes 29 LLC (the "Landowner") submits these comments and hereby requests both a public meeting and a contested case hearing regarding the application of 183 258 Liberty Hill LLC for TPDES Permit No. WQ0016517001. The application seeks authorization for the discharge of treated domestic wastewater from the proposed 183 258 Liberty Hill Wastewater Treatment Facility, a phased facility with daily average flows up to 0.15 MGD (Interim I), 0.30 MGD (Interim II), and 0.50 MGD (Final), via pipe to an unnamed tributary, thence to the South Fork San Gabriel River in Segment No. 1250 of the Brazos River Basin, in Williamson County, Texas.

The Landowner owns property identified in Map Numbers 18–22 of Appendix C to the Application, located adjacent to the proposed discharge route and within approximately one mile downstream of the Facility's proposed outfall. The Landowner has a near-term plan to develop this land for residential, commercial and light industrial uses

The Landowner is concerned that the proposed discharge may adversely affect their property through changes in water quality, alteration of flow conditions and its impact on the environment, and potential impact to human health and the environment due to the exposure to the subject effluent discharges. These concerns fall within the Commission's jurisdiction to protect water quality and designated uses under the Texas Water Code and the Texas Surface Water Quality Standards. Accordingly, the Landowner has a personal justiciable interest not common to the general public and qualify as affected persons.

### Issues of Concern

Based on the materials available in the record, the Landowner raises the following issues of concern. These represent relevant and material disputed issues of fact forming the basis for this hearing request:

1. Compliance with Siting Requirements. The Application indicates that required buffer zones extend onto adjacent properties. The Application does not include sufficient siting information pursuant to 30 TAC Ch. 309, including information required in 30 TAC § 309.13.

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2. Characterization of the Discharge Route. The Application and Draft Permit describe the outfall as discharging via pipe to an unnamed tributary, thence to the South Fork Gabriel River. The Landowner disputes whether the feature receiving the discharge is properly characterized as a watercourse. The record does not establish the hydrologic characteristics of this feature or whether it conveys water in a manner that would render it a watercourse.
3. Regionalization Analysis. The Application provides only a brief, conclusory statement regarding regionalization and does not evaluate nearby facilities in Williamson County that may provide service. Whether regionalization has been adequately considered under the Texas Water Code and applicable regulations and Commission policy is a disputed factual issue.
4. Sewage Solids Management. The Sewage Solids Management Plan does not identify disposal locations or capacity arrangements. Whether the sludge management plan complies with 30 TAC Chapter 312 is a disputed factual issue.
5. Additional Issues. The Landowner also raises the following comments and issues for consideration:
  - Whether the Application is administratively and technically complete and accurate;
  - Whether the treatment process description is sufficiently detailed;
  - Whether the Draft Permit includes adequate effluent limits, monitoring, and reporting;
  - Whether the Draft Permit is protective of human health, recreation, and contact recreation uses, as required by the Texas Surface Water Quality Standards;
  - Whether the Draft Permit complies with antidegradation requirements in 30 TAC §307.5;
  - Whether public notice satisfied all requirements; and
  - Whether the Draft Permit adequately considers cumulative and downstream impacts.

### Request for Public Meeting and Contested Case Hearing

The Landowner respectfully requests that the Executive Director hold a public meeting on the Application in Williamson County. A public meeting would provide an appropriate forum for additional information and public input from affected persons.

In addition, the Landowner hereby requests a contested case hearing on TPDES Permit No. WQ0016517001. The Landowner has identified their personal justiciable interests, their location

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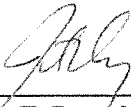
relative to the Facility and discharge route, the nature of the potential adverse effects, and the relevant and material disputed issues of fact raised during the comment period.

These comments, together with this request for a public meeting and request for a contested case hearing, are submitted to preserve the Landowner's rights to participate further in this matter.

Respectfully submitted,

HOLMES 29, LLC  
(a Texas limited liability company)

By: INTREPID EQUITY INVESTMENTS, LLC  
(a Texas limited liability company)  
*Its Manager*

By:   
Justin T. Day, *Manager*

Address: 3616 Far West Boulevard, Suite 117-314  
Austin, Texas 78731  
Daytime Phone: (512) 225-1400  
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## Tammy Washington

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**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, August 21, 2025 5:13 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0016517001

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Jesús Bárcena  
Office of the Chief Clerk  
Texas Commission on Environmental Quality  
Office Phone: 512-239-3319

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**From:** shawnh199@yahoo.com <shawnh199@yahoo.com>  
**Sent:** Thursday, August 21, 2025 12:37 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0016517001

**REGULATED ENTY NAME** 183 258 LIBERTY HILL WWTP

**RN NUMBER:** RN111949236

**PERMIT NUMBER:** WQ0016517001

**DOCKET NUMBER:**

**COUNTY:** WILLIAMSON

**PRINCIPAL NAME:** 183 258 LIBERTY HILL LLC

**CN NUMBER:** CN606248698

**NAME:** MR Shawn Hight

**EMAIL:** [shawnh199@yahoo.com](mailto:shawnh199@yahoo.com)

**COMPANY:**

**ADDRESS:** 1081 County Road 257  
Liberty Hill, TX 78642

**PHONE:** 5126261475

**FAX:**

**COMMENTS:** I'm requesting a contested hearing concerning the water treatment plant being placed off of counter of 258 and do not want the extension or mismanagement that has been previously shown by the other water plant at the city of liberty Hills put in outside of their own city. My other concern is to the potential damage that will be done to the north Saint Gabriel River by the dumping of treated sewage waste.