

**Jennifer Cox**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, July 2, 2024 3:44 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0016517001  
**Attachments:** 062024 183 258 Liberty Hill Application Permit Response\_FINAL.pdf

**From:** tiffanym@brazos.org <tiffanym@brazos.org>  
**Sent:** Tuesday, July 2, 2024 3:03 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:** Tiffany Malzahn

**EMAIL:** [tiffanym@brazos.org](mailto:tiffanym@brazos.org)

**COMPANY:** Brazos River Authority

**ADDRESS:** PO BOX 7555  
WACO TX 76714-7555

**PHONE:** 2547613151

**FAX:**

**COMMENTS:** Please see attached letter.



Brazos River Authority

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July 2, 2024

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

Re: Application for TPDES Permit No. WQ0016517001 (EPA I.D. No. TX0145882)  
Facility: 183 258 Liberty Hill WWTP (RN111949236)  
Applicant: 183 258 Liberty Hill LLC (CN606248698)

Dear Chief Clerk:

The Brazos River Authority (BRA) appreciates the opportunity to provide comment on the above referenced application for permit for the discharge of domestic wastewater.

Without appropriate protective measures, the BRA has concerns with adding a discharge to this sensitive segment of the South Fork San Gabriel River (Segment 1250). Downstream sections of this clear running limestone bedrock and gravel dominant stream have been negatively impacted by upwardly trending nitrate levels from wastewater discharges that have resulted in excessive algal growth affecting both aquatic life and general aesthetics. This impact can be observed in the surface water quality monitoring from South Fork San Gabriel (Segment 1250\_02). TCEQ Station 12116, the most upstream Clean Rivers Program monitoring point at this time, best represents the current conditions of the questioned segment whereas station 21739 (2.5 miles downstream of station 12116) illustrates the impact increased nutrient loads are having on this stream.

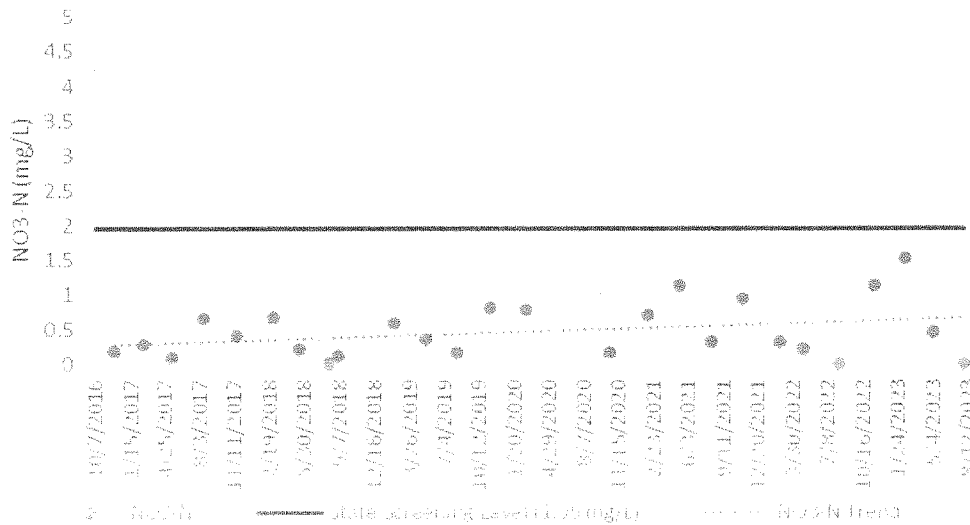
We believe issuance of this permit has the potential to cause damage to the fragile local ecosystem similar to that observed downstream on the South Fork San Gabriel River. Additionally, continued residential growth in the watershed will only exacerbate these trends of increasing nutrient loads and the resultant growth of nuisance vegetation. We respectfully request that TCEQ considers inclusion of nutrient monitoring requirements in the permit and encourage the entity to pursue reuse of some or all of the treated wastewater.

Sincerely,

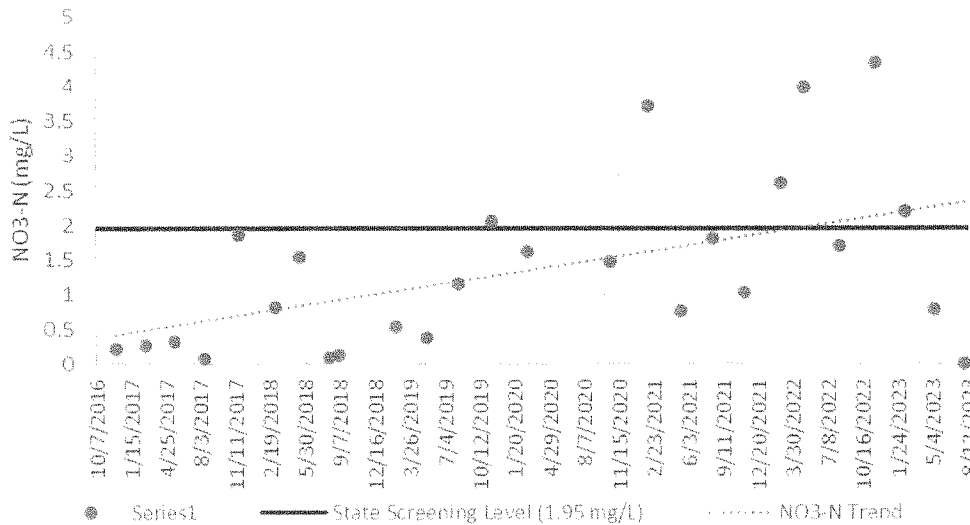
Tiffany Malzahn  
Environmental and Compliance Manager



NO3-N Station 12116



NO3-N Station 21739





Brazos River Authority



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