

REGULATED ENTITY: Honey Creek Ranch WWTP
RN NUMBER: RN110389046
PERMIT NUMBER: WQ0015835001
COUNTY: Comal
PRINCIPAL NAME: Silesia Properties LP
CN NUMBER: CN605525542

I am writing in opposition to the above referenced permit application.

Allow me to introduce my qualifications and background to you. I am a Fellow of the National Speleological Society, a member of the National Groundwater Association, a state Registered Professional Geoscientists, a state Registered Sanitarian, and recipient of the Annual Nation Stewardship award from the Nature Conservancy. I work daily as a professional karst geologist. I have worked as a county sanitarian inspecting the design, installation, and failure of OSSFs.

In the late 1970s The Nature Conservancy, a worldwide organization, selected this area of Honey Creek and Guadalupe River for protection and preservation for the future generations of all citizens. They worked closely with the Texas Parks and Wildlife for the TPWD to take oversight and management of this unique and critical area once it was purchased for protection. Following the purchase, I was involved in conducting further in-depth geologic inventory and assessments of the area mapping several cave streams. This karst area recharges surface water into multiple cave systems that move a large volume of water a long distance. This groundwater is used by many rural farm, ranch, and homeowners in their private water wells to serve their families.

If a private OSSF or an industrial treatment plant is managed and run flawlessly it can discharge biologically acceptable wastewater. However, these systems do not remove the pharmaceutical chemicals such as endocrine disruptors, and other chemicals that are generally referred to as PPCPs. These are presently being found in wastewater discharges. Wastewater treatment methods do not remove these and discharging this waste stream onto a groundwater recharge area will move any contamination through the groundwater.

In the near future there will probable not be an issue with the running of this plant. But as we all know over time the cost of maintenance increases and equipment fails, sometimes catastrophically. Once contamination has entered a karst groundwater system it is very expensive and almost impossible to clean it up. Many attempts to clean karst groundwater systems have been attempted across the nation and several in the Edwards Aquifer. A few have had moderate success, but most have no success.

I hope that TCEQ will consider the possible irreversible impacts allowing this wastewater discharge and the loose to the many citizens who live and visit this area for the convenience of a few. In my opinion this is not the correct location for a large, dense home development.

Regards,

Jon Cradit, R.S. 3627, P.G. 5283