Texas Commission on Environmental Quality Investigation Report

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Customer: Silesia Properties, LP Customer Number: CN605525542

Regulated Entity Name: HONEY CREEK RANCH WWTP

Regulated Entity Number: RN110389046

Investigation # 1624374 **Incident Numbers**

Investigator: CHRISTOPHER DZIUK Site Classification DOMESTIC MINOR

DOMESTIC LAND DISPOSAL

Conducted: 01/09/2020 -- 01/22/2020 No Industry Code Assigned

WASTEWATER **Program(s):**

Investigation Type: Site Assessment **Location:**

Additional ID(s): WQ0015835001

Address: 26226 HIGHWAY 46 W, Local Unit: REGION 13 - SAN ANTONIO

SPRING BRANCH, TX, 78070 **Activity Type(s):** WWTLPRECON - WW TLAP Recon

Principal(s):

Role Name

RESPONDENT SILESIA PROPERTIES LP

Contact(s):

Title Phone Role Name MS KARA POSSO PARTICIPATED GIT IN

REGULATED **DEVELOPER** KELLY LEACH Work (210) 827-7918

ENTITY CONTACT

Other Staff Member(s):

Role Name

Investigator KIMBERLY BRADY **QA Reviewer** JAVIER ANGUIANO Investigator SUSAN ROBERTS Investigator JAVIER ANGUIANO **QA** Reviewer JOY THURSTON-COOK

Associated Check List

Checklist Name Unit Name WQ SUBSURFACE AREA DRIP DISPERSAL SITE Honey Creek

ASSESSMENT

Investigation Comments:

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INTRODUCTION

The Silesia Properties, LP Honey Creek Ranch Wastewater Treatment Plant, Texas Land Application Permit (WQ0015835-001) Subsurface Application Drip Dispersal System (SADDS) site assessment was performed on January 9, 2020. The site assessment was performed to verify information provided in the Permittee's wastewater application. The site was evaluated by Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office investigators Mr. Chris Dziuk, Mr. Javier Anguiano, Ms. Kimberly Brady and Ms. Susan Roberts. Some additional information was requested from the facility representative, Mr. Kelly Leach, after the site visit was performed to substantiate materials provided in the wastewater application.

ADDITIONAL DISCUSSION

On January 9, 2020 TCEQ investigators met with representatives of the consulting firm, aci Group, LLC, at the proposed SADDS location. Consultant representatives Ms. Kara Posso and Mr. Mark Adams were present to meet with the investigators. Ms. Posso indicated that she would escort the investigators around the proposed irrigation sites to answer any questions or document any previously unidentified features that may arise from the site visit. Site map referencing field numbers is attached.

The investigators initiated the assessment in "Field 11" as noted in the wastewater application. The field was listed as 29.2 acres in size. The area appeared to be free from features or rock outcrops within the area directly east of the game fence. The topography and soil changed as the investigators moved farther to the east while still remaining in what was designated as "Field 11". Several areas of rock outcrops were noted on the eastern side of the ranch road located on the eastern edge of "Field 11". Ms. Posso was able to have a GPS overlay of the proposed drainfield locations which aided the investigators in determining what areas of the application fields were to be used for effluent application or where the buffer areas, as noted by the consultants, were located. The investigators also noted the presence of a gas pipeline easement that traverses "Field 11". Mr. Dziuk spoke with Mr. Kelly Leach, site representative for the development, regarding this easement being present and if this would be an issue for SADDS placement. Mr. Leach indicated that the easement will not pose a problem for SADDS placement. Also noted outside of the north/northwestern edge of the application area was a windmill used for agriculture water. The windmill was located outside of the game fence which denotes that area of "Field 11". Features noted by the consultants as well as other features encountered by the investigators worth mentioning are noted in the attached photograph log. Refer to Photograph Numbers 3-12 referencing "Field 11".

The investigators then proceeded to "Field 9". This application area is located adjacent to the "Entertainment Venue" on the property and is listed as 2.8 acres in size. This area is referenced in Photograph Numbers 1 and 2. These structures have service from at least one water well present but is located upgradient of the proposed "Field 9".

The investigators then assessed Fields 6, 7, and 8. The fields were noted to be separated by a dry stream/creekbed. The fields appeared to be free from obvious features. The field sizes are listed as 1,2, 1,5 and 1,9 acres.

The investigators then proceeded with Ms. Posso to "Field 5". This field is listed as 9.7 acres in size. The investigators noted an earthen pond located on the western edge of "Field 5" and eastern side of "Field 3". Refer to Photographs 14 and 15 for representation of the pond. Ms. Posso also indicated the presence of a feature not assessed as sensitive that is located on the eastern edge of "Field 5" but prior to the dry stream/creek that separates "Field 5 and 3". Photograph number 16 represents the area not listed as a sensitive feature.

The investigators proceeded to "Field 4" that is located on the southeastern portion of the property along Highway 46. The investigators noted several areas of rocks protruding in this proposed application area. The rocks were noted in a significant portion of this proposed application area. An earthen pond and water well were noted in the southeastern portion of the application area based on the maps provided to the investigators. Refer to Photographs 17, 18, 19 and 20 for images of the rock outcrops and water well/pond in "Field 4".

Fields 2 and 3 were evaluated next by the investigators. The investigators began the assessment on the eastern side of "Field 3", which is listed as 15.4 acres in size, and proceeded westward. The area was scattered with mixed woody vegetation with some rocky outcrops observed in the western edge of the application field. Separating "Fields 3 and 2" was an earthen pond that was fed by a water well. Refer to photograph No. 21 for images of the well and earthen pond. Investigators noted that portions of the pond liner were exposed to weathering above the soil layers. "Field 2", listed as 5.8 acres in size, was similar in nature to "Field 3" with scattered woody vegetation and areas of rock outcrop present in the proposed application field. This application field extends westward along Highway 46 to the game fence.

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The investigators then proceeded with Ms. Posso to the western edge of "Field 1". This application site also borders Highway 46 and is very densely populated with low-limbed woody vegetation and is listed as 11 acres in size. This area had not been cleared or enhanced making assessment very difficult. The investigators and Ms. Posso walked the area noted with rock outcrops. Refer to Photograph No. 22 for images of the vegetation and rocks noted.

After the site assessment was concluded, additional clarification was requested from the Regulated Entity. Mr. Kelly Leach met with Mr. Dziuk on January 22, 2020 to clarify questions that arose from information received in the TCEQ San Antonio Regional Office date-stamped January 17, 2020. The investigator specifically requested clarification on the finalized site map. Mr. Leach confirmed the map used during the site assessment was the most accurate.

At the time of this site assessment the application fields were not visually marked or delineated. The boundaries of the application fields were approximated by using an overlay on Ms. Posso's GPS-enabled phone. Therefore, the investigators visually evaluated the proposed land application areas where accessible. It would be helpful for future assessments that all the proposed application fields be marked/flagged for the investigators to more accurately and efficiently evaluate.

No Violations Associated to this Investigation

Signed Environmental Investigator	Date
Signed	Date
Supervisor	
Attachments: (in order of final report	submittal)
Enforcement Action Request (EAR)	Maps, Plans, Sketches
Letter to Facility (specify type) :	Photographs
Investigation Report	Correspondence from the facility
Sample Analysis Results	Other (specify):
Manifests	
Notice of Registration	

List of Attached files

Honey Creek Photolog.pptx