

Alamo, Austin, and Lone Star chapters of  
the Sierra Club

Bexar Audubon Society

Austin, Bexar and Travis Green Parties

Bexar Grotto

Boerne Together

Bulverde Neighborhood Alliance

Bulverde Neighbors for Clean Water

Cibolo Center for Conservation

Citizens for the Protection of Cibolo Creek

Comal County Conservation Alliance

Environment Texas

First Universalist Unitarian Church of SA

Friends of Canyon Lake

Friends of Dry Comal Creek

Friends of Government Canyon

Fuerza Unida

Green Society of UTSA

Guadalupe River Road Alliance

Guardians of Lick Creek

Headwaters at Incarnate Word

Helotes Heritage Association

Hill Country Alliance

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

Native Plant Society of Texas – SA

Northwest Interstate Coalition of  
Neighborhoods

Pedernales River Alliance – Gillespie Co.

Preserve Castroville

Preserve Lake Dunlop Association

Preserve Our Hill Country Environment

RiverAid San Antonio

San Antonio Audubon Society

San Antonio Conservation Society

San Geronimo Valley Alliance

San Marcos Greenbelt Alliance

San Marcos River Foundation

Save Barton Creek Association

Save Our Springs Alliance

Scenic Loop/Boerne Stage Alliance

Securing a Future Environment

SEED Coalition

Signal Hill Area Alliance

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection Assoc.

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

PO Box 15618

San Antonio, Texas 78212

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March 17, 2022

Laurie Gharis, Chief Clerk

Office of the Chief Clerk, MC 105

Texas Commission on Environmental Quality

PO Box 13087

Austin, TX 78711-3087

*Submitted electronically at <https://www14.tceq.texas.gov/epic/eComment/>*

Re: Comments and Hearing Request Regarding Application of Gram Vikas Partners, Inc. for TPDES Permit No. WQ0015990001

Please accept the attached comments on behalf of the fifty-six member groups of the Greater Edwards Aquifer Alliance

1. **Background.** Gram Vikas Partners, Inc., 215 West Bandera Road, #114-474, Boerne, Texas, 78130, has applied to the Texas Commission on Environmental Quality (TCEQ) for new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0015990001, to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 200,000 gallons per day. The facility will be located approximately 0.3 miles south-southeast of the intersection of Farm-to-Market Road 1101 and Watson Lane, in Comal County, Texas 78130. The treated effluent will be discharged to Mesquite Creek, thence to York Creek, thence to the Lower San Marcos River in Segment No. 1808 of the Guadalupe River Basin.

2. **Greater Edwards Aquifer Alliance (GEAA).** GEAA submits the following comments on behalf of our fifty-six member organizations and requests a contested case hearing regarding this permit application. GEAA is a 501(c)(3) nonprofit organization that promotes effective broad-based advocacy for the protection and preservation of the Edwards Aquifer, its springs, watersheds, and the Texas Hill Country that sustains it. GEAA has multiple members who would be adversely affected by the proposed application of Gram Vikas Partners, Inc.

GEAA's members have serious concerns regarding the permit application and draft permit, and regarding the degradation to Mesquite Creek, York Creek, and the Lower San Marcos River that will likely occur with the discharge of treated sewage into these waterways. GEAA and its members' specific areas of concern are summarized in the following section of this letter.

3. **Comments on the application.** As noted in the Notice of Public Meeting, Notice of Application, and Preliminary Decision, the proposed discharge route is from the Mesquite Creek Wastewater Treatment Facility to Mesquite Creek, thence to York Creek, thence to the Lower San Marcos River. There are several areas of concern with the current application:

a. Implementation of Beneficial Reuse: As it stands today, the Gram Vikas Partners, Inc. draft TPDES permit does not include any capacity to conduct beneficial reuse. Accordingly, GEAA urges Gram Vikas Partners, Inc. to utilize a “One Water” approach for their wastewater treatment system, incorporating beneficial reuse of effluent, thereby eliminating the need to discharge effluent into Mesquite Creek. Gram Vikas also has the option to maximize the beneficial use of effluent by supplying the effluent to entities for use under Chapter 210 Beneficial Reuse Authorizations to the maximum extent reasonably feasible. In the event Gram Vikas Partners, Inc. is unable to reuse all of the wastewater generated, GEAA recommends that the remaining amounts be land applied, with Gram Vikas Partners, Inc. purchasing the necessary land for such and obtaining the requisite TLAP permit from TCEQ.

b. Disinfectant Method: The draft permit indicates that Gram Vikas, Partners, Inc. will be utilizing chlorine contact chambers as a means of disinfectant to further treat the effluent from the Mesquite Creek Wastewater Treatment Facility. We urge the disinfectant method be changed to an ultraviolet light disinfectant. Ultraviolet light disinfectant treatment requires less space and is a physical process (rather than a chemical process) that has no residual effect that could harm humans or aquatic life.

All forms of chlorine are highly corrosive and toxic, and chlorine residuals could cause negative impacts on aquatic life. Further, chlorine residuals are unstable in the presence of high concentrations of chlorine demanding materials (BOD). This would require wastewater with high BOD concentrations to be treated with high chlorine doses for adequate disinfection, increasing the likelihood of hazardous compounds such as trihalomethanes.

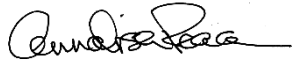
c. Water Quality and Quantity Impacts: The proposed effluent will flow from Mesquite Creek, thence to York Creek, thence to the Lower San Marcos River at a volume of 200,000 gallons per day. The river is a popular recreational spot year-round for snorkeling, fishing, swimming, tubing, and kayaking. Further, landowners have expressed concerns regarding the water quality impacts the Mesquite Creek Wastewater Treatment Facility’s effluent would have on the watering ponds’ livestock and wildlife use. Impacted landowners have noted that these ponds are the only sources of drinking water for nearby livestock and wildlife, increasing the likelihood of livestock and wildlife health concerns.

The TCEQ has previously stated that in evaluating wastewater permits, they consider baseline conditions in the receiving stream, the physical and the hydrological characteristics of the stream, waterbody uses, and the associated water quality standards that protect those uses. We recognize the TCEQ Standard Implementation Team implementing a limit of .50 mg/L effluent limit for total phosphorus (TP) and approve of this decision; bringing the effluent limitations for this draft permit to 5 mg/L carbonaceous biochemical oxygen demand (CBOD<sub>5</sub>), 5 mg/L total suspended solids (TSS), 2 mg/L ammonia-nitrogen (NH<sub>3</sub>-N), and .50mg/L total phosphorous (TP).

We trust that the TCEQ will consider the stated factors when implementing the Gram Vikas Partners, Inc. permit and will adopt standards that are in line with others in Central Texas.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Annalisa Peace  
Executive Director  
Greater Edwards Aquifer Alliance