



METROPOLITAN HEALTH DISTRICT

May 8, 2023

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

Comment
Permit No. WQ0016171001

Chief Clerk and Commissioners,

This will serve as a formal request to the TCEQ to deny Permit # WQ0016171001 due to potential environmental impacts which are outlined below.

The San Antonio Metropolitan Health District (Metro Health) is the public health agency for San Antonio and unincorporated areas of Bexar County. Metro Health is a Department of the City of San Antonio, Texas. San Antonio is the 7th most populous United States city (1.5 million) and is the 2nd most populous city in the state of Texas. San Antonio relies on the Edwards Aquifer for most of its drinking water. The Guajolote Ranch WRRF Domestic Wastewater Permit Application is requesting to discharge up to 1,000,000 gallons a day of treated effluent into Helotes Creek and into and over the Edwards Recharge Zone. Your notice of application and preliminary decision of TPDES permit for municipal wastewater states that a Tier 1 antidegradation review has preliminarily determined that existing water quality uses will not be impaired by this permit action. The application does not state where the data can be reviewed for this determination. Please provide data analysis that led to this determination and an explanation of how the determination was made as well as an associated literature review. Also, the application notice states a Tier 2 review has preliminarily determined that no significant degradation of water quality is expected in Lower Leon Creek which have been identified as having high aquatic life uses. Again, no data was given nor was it linked. Please provide the data and analysis along with explanation of results that has led to this predetermination including associated literature review of supporting evidence.

A general location of the facility map was provided. The location and the creek system where the discharge will occur has been an area of concern for contamination for many years. At least, three known incidents have occurred that have led to human illness. One was a wastewater system located approximately three miles from the proposed facility where a wastewater plant was

operated for a subdivision. Effluent entered the creek system and residential wells were affected and residents became ill. The second and more recent case occurred in Helotes during a mulch fire. Water placed on the fire by TCEQ found its way up hill and contaminated several residential wells. This was the most expensive emergency response conducted by TCEQ until the West explosion. A third incident occurred in a SAWS drinking water well located near a creek. This well was contaminated with cryptosporidium which is very hard to sample and test for and does not take a lot of contamination to cause human illness. The well was taken offline because of illnesses that occurred. All these incidents were due to the lack of understanding for karst terrain. Simply stated, contamination is not predictable in karst terrain. Since there is no filtration in karst, contamination occurs quickly and moves in surprising ways.

A municipal well and many residential wells are located very near and downstream from the proposed location of this wastewater treatment facility which will discharge *Escherichia coli* as well as chemicals associated with wastewater treatment into a karst creek system.

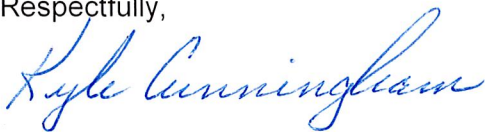
The Helotes Creek also has several caves including at least one karst preserve that are known habitat for Bexar County Cave Invertebrates that have been declared by US Fish and Wildlife as endangered. Please provide documentation that the U.S. Fish and Wildlife Service has been properly notified of this permit application and have granted their approval of the 1,000,000 gallons a day of wastewater to be discharged into Helotes Creek possibly impacting the endangered species and their habitat.

Metro Health also has a concern for air quality. San Antonio is in moderate nonattainment for ozone and may well be placed in severe nonattainment for ozone if ozone levels cannot be lowered. Exceedance levels of ozone were produced April 30, 2020. This was during the Covid shutdown with low levels of NOx recorded. This exceedance level of ozone was reported at a monitor close to a wastewater treatment facility that experienced a spill. There were no other exceedances or even high levels of ozone recorded anywhere else in Texas for the day of the spill.

Simply stated without clean water and clean air a healthy community cannot exist.

For the reasons stated above, we request that the TCEQ deny Permit No. WQ0016171001 without further action and require that each residential structure built uses an individual aerobic wastewater system designed and constructed in accordance with the requirements of the Bexar County Public Works Department which would result in no discharge of wastewater into Helotes Creek or any creek in a karst terrain.

Respectfully,



Kyle Cunningham M.S., R.S.

Health Program Manager

Public Center for Environmental Health