

February 28, 2022

City of Blanco
Attn: Warren Escovy, City Administrator
300 Pecan Street
Blanco, TX 78606

RE: Revised Blanco Water Reclamation Task Force recommendation for consideration by Blanco City Council

Dear Mr. Escovy,

As Director of Watershed Services for The Meadows Center for Water and the Environment, I have served as the official facilitator of the Blanco Water Reclamation Task Force (Task Force) commissioned by the City of Blanco in September 2020. The purpose of this memo is to formally present a key recommendation of the Task Force for City Council consideration and possible action.

Task Force Recommendation

The City of Blanco should direct the City Engineer to proceed with the following:

1. Begin work with Texas Commission on Environmental Quality (TCEQ) staff to complete a phased Texas Land Application Permit (TLAP) application utilizing existing plant infrastructure, storage ponds and city-owned lands to minimize potential for treated effluent discharge into the Blanco River.
2. The TLAP permit should include additional phases to capture increased treatment capacity as additional storage and/or suitable lands become available for utilization under the TLAP.
3. To cover the balance of wastewater produced in exceedance of the capacity of the TLAP, complete a phased Texas Pollutant Discharge Elimination System (TPDES) to include water quality effluent limits that are protective of the nutrient-sensitive waters of the Blanco River. Final Phase of TPDES may not exceed a daily discharge rate of 0.225 MGD.
4. Upon completion of any and all water use agreements for treated effluent, seek permit coverage first under the TLAP. If water use agreements do not meet statutory/permit requirements of the TLAP, seek coverage for beneficial reuse of the maximum amount available of treated effluent through Ch. 210 Authorizations.

THE MEADOWS CENTER FOR WATER AND THE ENVIRONMENT

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This letter is an electronic communication from Texas State University.

Additionally, the City of Blanco should commit via a permit clause, settlement agreement, interlocal agreement or other binding document to the following process for managing future wastewater treatment capacity demands:

- A. The TLAP will be considered the City's primary permit for treated effluent disposal with the TPDES permit utilized only as a secondary means of reuse/disposal.
- B. As annual reclaimed water use demands are established through Ch. 210 Authorization(s), the City shall seek expanded capacity for these authorizations under the TLAP using Beneficial Reuse Credits.
- C. Every reasonable effort will be made by the City to ensure that treated effluent will be directed to land disposal and/or distributed as reclaimed water under Ch. 210 Authorization(s) prior to considering discharge to the Blanco River. This includes a commitment to maintaining additional lands under reclaimed water-use agreements for the life of the permit term to supplement City-owned property and prevent a maximum amount of wastewater effluent from being discharged.
- D. Future development agreements associated with management of wastewater through the City of Blanco should guarantee 100% beneficial reuse or land disposal of treated effluent. Options may include decentralized wastewater regimes, provisions for additional land and storage for coverage under the city's TLAP, purple pipe for coverage under a 210 Authorization.
- E. Adopt enhanced monitoring and reporting requirements of all irrigation operations designed to improve the City's ability to demonstrate firm demand for reclaimed water under the TCEQ's rules regarding Beneficial Reuse Credits.
- F. Implement third-party monitoring of effluent quality and Blanco River quality by POB, Meadows Center, or other qualified consultant to monitor impacts of transitional period on the Blanco River.

The Task Force is happy to facilitate, engage and provide ongoing support throughout the permit revision and application process.

Please feel free to contact me for additional information at 512.213.7389 or at nickdornak@txtate.edu.

Sincerely,

Nick Dornak

Nick Dornak
Director of Watershed Services,
The Meadows Center for Water and the Environment