

P O Box 520 Blanco, Texas 78606

March 1, 2022

Dear Mayor Lumpee and members of the Blanco City Council,

Protect Our Blanco supports the recommendations of the Water Reclamation Task Force dated February 28, 2022 and in support of those recommendations offers the attached proposed permit terms to bring a little specificity to the discussions.

I have included two attachments to this letter. **Attachment A** reflects one possible permit scenario, beginning at 0.180 MGD total capacity. **Attachment B** is a spreadsheet showing the City's actual effluent volume for the past 6.5 years has averaged less than 144,000 gpd. POB acknowledges that the City's current permit is for 0.225 MGD total capacity; however, POB believes the proposed 0.180 MGD scenario is preferable if the City's goal is to transition to a 100% TLAP permit.

First, since the transition to a TLAP will potentially be a slow one—because this scenario does not impose any hard timeline on the City to make infrastructure improvements--the 0.180 MGD scenario has the effect of limiting the amount of wastewater that could end up being discharged into the Blanco River during the interim phases. The City would progress through these phases as it adds additional capacity with each improvement it makes (such as added storage or added irrigable land). At the same time, the 0.180 MGD scenario would not limit (or alter) the City's current practices or the City's ability to expand its capacity in future phases—that is entirely dependent on how much reclaimed water the City leases in the meantime (i.e., reuse credits are based on firm demand).

The second main reason POB prefers the 0.180 MGD scenario is because it incentivizes the City to transition to a 100% TLAP based on reasonably attainable infrastructure improvements identified today and to a robust reclaimed water program, by using reclaimed water credits for achieving a 100% TLAP. And POB's primary objective is to map out a clear and achievable path to transition from a TPDES permit to a 100% TLAP.

If you look at Attachment A, you'll see that POB estimates that with 19.1 MG of storage (to which the City has already committed) and with 60 acres of irrigable TLAP land that the City owns (which the City says is possible in its October 2020 permit application), the City could dispose of approximately 180,000 gpd under a TLAP, which would be more than sufficient considering the City's current reported average of roughly 144,000 gpd. POB further estimates that the Harbison reclaimed water lease (for 26 irrigable acres) could conservatively demand 20,000 gpd on average. Should the City be able to demonstrate 45,000 gpd through reclaimed water leases, then it could achieve a TLAP at 0.225 MGD. In fact, using reclaimed water credits, the City could eventually expand its total capacity to as much as 0.360 MGD.

Please keep in mind that the only way the City would need to discharge over 200,000 gpd in the next 20 years is if the City were to expand its City Limits or should enter into an agreement to provide services to some development outside the city limits - in both events the tax base and development fees could fund more storage or acquisition of irrigable acreage and those developments could be subject to the requirement of purple pipe treatment of effluent.

Finally, POB would like to be clear that its support for the above scenarios assumes that the City adopts effluent treatment quality as shown in Attachment A and that POB and the City can come to an agreement on some of the remaining issues in the Task Force recommendations regarding future land developments, enhanced monitoring and reporting requirements, and third-party monitoring of effluent quality and the Blanco River. Should the Council approve these remaining recommendations in principle, POB is confident that an agreement can be reached as to the precise details, but it will require additional negotiations to simply wrap up the remaining details.

Therefore, POB respectfully requests that the Council take the following actions:

- Approve the Task Force recommendations (1)-(4) in the Task Force letter of February 28, 2022 and direct staff to work with TCEQ and amend the City's WWTP application with terms substantially similar to those in Attachment A; and
- 2. Approve the Task recommendations (a)-(g) and direct staff to continue good faith negotiations with the Task Force, POB, and other stakeholders regarding an agreement for how to deal with future developments, enhanced monitoring and reporting, and third-party monitoring of effluent quality and the Blanco River, in pursuit of avoiding any contested case hearing on the City's WWTP application.

Thank you for considering these comments. Please contact me with any questions.

Sinceret POB Board President

ATTACHMENT A

POB's Proposed Permit Terms for the City of Blanco WWTP – 0.180-0.360 MGD

POB proposes a 5-year permit in several phases that moves the City to 100% TLAP utilizing Reuse Credits:

• Phase I, 0.180 MGD total capacity (43% TLAP / 57% TPDES)

(NOTE: The City is reporting less than 144,000 gpd monthly average, about 80% of 0.180 MGD)

- TLAP: Blanco is authorized to dispose of the first 78,000 gpd on 26 acres of land owned by the City via spray irrigation and must maintain at least 9 MG of storage.
- TPDES: Blanco is authorized to dispose of 102,000 gpd of via direct discharge.
- Phase II, 0.195 MGD total capacity (60% TLAP / 40% TPDES)
 - TLAP: Blanco is authorized to dispose of the first 120,000 gpd on 26 acres of land owned by the City via spray irrigation and must maintain at least 19.1 MG of storage (already committed in 2021).
 - TPDES: Blanco is authorized to dispose of 75,000 gpd of effluent via direct discharge.
- Phase III, 0.210 MGD total capacity (86% TLAP / 14% TPDES)
 - TLAP: Blanco is authorized to dispose of the first 180,000 gpd on 60 acres of land owned by the City via spray irrigation (as in existing permit application) and must maintain at least 19.1 MG of storage.
 - TPDES: Blanco is authorized to dispose of 30,000 gpd of effluent via direct discharge.
- Final Phase, 0.225 MGD total capacity (up to 100% TLAP w/ Reuse Credits)
 - TLAP: Blanco is authorized to dispose of 225,000 gpd on 60 acres of land owned by the City via spray irrigation and must maintain at least 19.1 MG of storage <u>WITH REUSE CREDITS of at least 20,000 gpd</u>.
 - For example, if the permitted flow is 225,000 gpd and the calculated beneficial reuse credit is 20,000 gpd, the City would use 205,000 gpd to calculate the required acreage of the land application area. If the City only owned 60 acres, it would have the ability to land apply 180,000 gpd and would need to retain the ability to discharge up to 25,000 gpd. But, if the City could demonstrate as much as 45,000 gpd in reuse credits, then the City could transition to a 100% TLAP at that time.
 - The City cannot expand beyond 0.225 MGD until it has transitioned to a 100% TLAP. The City would convert the discharge route to a reclaimed water delivery route.

- Future Phases, up to 0.360 MGD total capacity (100% TLAP)
 - TLAP: Blanco is authorized to dispose of 360,00 gpd on 60 acres of land owned by the City via spray irrigation and must maintain at least 19.1 MG of storage <u>WITH REUSE CREDITS of 180,000 gpd</u>.
 - Under current commitments, Blanco can expand to as much as 0.360 MGD of total capacity with reuse credits alone (would need to demonstrate firm demand of 180,000 gpd).
- Special Conditions to the Permit apply under ALL ABOVE PHASES:
 - Blanco must first dispose of its effluent through TLAP and the levels stated above before utilizing TPDES (direct discharge) under either Phase I, II, III, or the Final Phase.
 - Blanco must store and reuse its effluent to the maximum extent possible before directly discharging under either Phase I, II, III, or the Final Phase.
 - Blanco must maintain a lease for reuse water on at least 26 acres for the life of the permit (5 years) (nothing prevents more reuse leases).
 - Once increased storage and increased TLAP land is brought online, Blanco is compelled to operate in the next phase.
 - Blanco is required to maintain ownership of at least the acres it currently owns around the plant for its purposes for the life of the permit.
- Under TLAP
 - City would take annual soil samples on area where it is land applying effluent, consistent with TCEQ requirements (e.g. pH, Electrical Conductivity, Nitrate-nitrogen, ammonium nitrogen, Total Kjeldahl Nitrogen (TKN), Total Nitrogen, Plant-available Phosphorus, and Plant-available Potassium.)
- Under TPDES
 - Any effluent discharged must meet TCEQ's standards in prior draft permit:
 - CBOD (5-day): 5 mg/l
 - Total Suspended Solids: 5 mg/l
 - Ammonia Nitrogen: 1.9 mg/l
 - Total Phosphorus: 0.15 mg/l
 - *E. coli*: 126
 - pH: 6.0-9.0
 - Dissolved Oxygen: ≥ 6.0 mg/l
 - Chlorine residual: 0.1 mg/l

ATTACHMENT B

	City of Blanco reported
	Average Daily Influent
	(gallons)
May-15	278,710
Jun-15	166,763
Jul-15	132,516
Aug-15	124,194
Sep-15	119,200
Oct-15	152,516
Nov-15	179,767
Dec-15	163,630
2015 Average	164,662
Jan-16	149,355
Feb-16	128,586
Mar-16	139,452
Apr-16	138,667
May-16	165,129
Jun-16	231,600
Jul-16	131,774
Aug-16	129,129
Sep-16	143,067
Oct-16	129,613
Nov-16	134,400
Dec-16	141,871
2016 Average	146,887
Jan-17	140,806
Feb-17	144,704
Mar-17	142,226
Apr-17	138,867
May-17	126,968
Jun-17	127,733
Jul-17	104,581
Aug-17	123,323
Sep-17	Not Available
Oct-17	122,387
Nov-17	116,733
Dec-17	124,806
2017 Average	128,467
Jan-18	115,677
Feb-18	110,179
Mar-18	112,355
Apr-18	108,167
May-18	114,323
Jun-18	111,233
Jul-18	Not Available
Aug-18	118,000
Sep-18	154,950
Oct-18	195.133

Nov-18	139,828
Dec-18	194,226
2018 Average	134,006
Jan-19	194,065
Feb-19	157,885
Mar-19	152,871
Apr-19	157,100
May-19	235,742
Jun-19	155,067
Jul-19	139,000
Aug-19	141,677
Sep-19	135,167
Oct-19	139,516
Nov-19	145,333
Dec-19	134,806
2019 Average	157,352
Jan-20	136,323
Feb-20	149,103
Mar-20	138,000
Apr-20	145,600
May-20	165,355
Jun-20	142,655
Jul-20	119,419
Aug-20	131,871
Sep-20	137,800
Oct-20	138,067
Nov-20	129,600
Dec-20	137,567
2020 Average	139,280
Jan-21	135,000
Feb-21	132,938
Mar-21	141,710
Apr-21	142,700
May-21	163,742
Jun-21	159,433
Jul-21	166,000
Aug-21	119,968
Sep-21	116,167
Oct-21	132,516
Nov-21	139,913
Dec-21	122,097
2021 Average	139,349
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5/15-12/21	
TOTAL AVERAGE	143,576