

My view on the Peninsula RV Resort's pending permit application with TCEQ for proposed Texas Pollutant Discharge Elimination System Permit No. WQ0016276001:

I would like to begin by saying that I support all economic growth in this town, and I support the concept of the Peninsula RV Resort Project. What I do not support, is the release of effluent into Hubbard Creek Reservoir. I feel strongly that if the Texas Pollutant Discharge Elimination System permit were approved by TCEQ, and the plan is implemented, it could negatively affect what is most likely this community's most valued economic and recreational resource...our beautiful lake.

What the citizens of Breckenridge and Stephens County need to consider is "Do we really want to risk the potential impact on the water quality of the lake, over the long term, that effluent being discharged into the lake may create? How will the perception of the lake of those coming to the lake to fish, boat, ski, and swim, be impacted by the idea of effluent being discharged directly into the lake? During times of drought, as a major source of drinking water for the community, how will the release of effluent into the lake affect the drinking water quality? Will the potential economic growth generated by the Peninsula RV Resort offset the potential negative effect from the effluent discharge on property values around the lake...that are also an economic driver for the community? Will approval of this treated wastewater permit to discharge into Hubbard Creek Reservoir set a precedent that may encourage other effluent discharge into the lake in the future?

It is vital that we preserve our aquatic ecosystem and our water quality, not just for economic purposes such as bringing people to our community, but also for drinking water and food consumption. We all need to remember that Hubbard Creek Reservoir is a source for drinking water for Breckenridge, Albany, Abilene and Anson as well, and many residents and visitors consume the fish caught from the lake.

Treated effluent appears to be crystal clear, and the chlorination process used is supposed to kill 99% of the illness causing bacteria, but even in the most modern wastewater treatment plants, all nutrients cannot be removed. Treated wastewater may contain nitrogen and phosphorus content that could result in

algae blooms. Algal blooms deplete oxygen levels and can harm the aquatic habitat. Another factor to be considered are the non-organic pollutants that might not be removed from effluent such as pharmaceuticals, personal healthcare products, and certain cleaning supplies and other miscellaneous chemicals. Heavy metals such as lead, zinc, and mercury are also found in effluent at times.

The Environmental Protection Agency and TCEQ sets acceptable levels of contaminants for treated wastewater and the concentrations of pollutants are expressed in terms of parts per million. There is an acceptable amount of E.coli bacteria with the monthly average in fresh water as being 126 colony units per 100 milliliters. Most, but not all, treated wastewater is discharged into streams or rivers due to the filtration and dilution characteristics of running bodies of water. The proposed effluent coming from the Peninsula RV Resort project will be discharged at 15,000 gallons per day into a body of water that does not have the advantage of the filtration and dilution characteristics of a running body of water and that can be severely affected by drought. Hubbard Creek Reservoir is currently at 66.1% capacity. If we are not receiving substantial rains, there is no in and out water flow for our lake, which could affect the dilution and distribution of the effluent.

Another significant concern is that our area will experience another summer of multiple days of temperatures above 103 degrees with no rain. If so, with the lake level continuing to drop and the proposed discharge point for the effluent ends up above the water line, will the discharge go onto the ground or what is left of the reservoir in that area? Will the chlorine amount utilized in the disinfecting process stay in certain areas?

I understand that effluent discharge such that is being proposed is a "common" practice in Texas, but does that mean that it should be deemed acceptable to us? Is there a certain stigma attached to lakes that have treated wastewater discharged into them, and does it lessen their desirability? These are all questions to consider.

I recognize that the plans for this wastewater treatment plant were developed, and will be implemented, by a highly skilled group of engineers. I have reviewed the 138 page TPDES permit application developed by the engineering firm of Hibbs and Todd. I am not contesting the fact that it will be built to specification

and that no expense will be spared. I also recognize the owner of the Peninsula Resort LLC has proven herself as a successful business owner. I appreciate and respect the work that she has done in the development of this project.

My concern regarding the domestic wastewater treatment facility is there is always room for error. Sewage treatment plants may regularly malfunction due to mechanical failure or operational errors. I confirmed with the engineer who wrote the permit with Hibbs and Todd, that there will not be an operator onsite at all times, but they will be "on call" when not at the plant. Although there are many domestic TPDES permits granted, most wastewater treatment plants are operated by municipalities, and not individual, (domestic), groups. It is my understanding that the initial plan for the Peninsula RV Resort LLC was to place an aerobic system on the premises and use a portion of the wastewater for purposes of irrigation.

I began the petition process, (with the help of others), because I felt that many people were unaware that a permit to release effluent into Hubbard Creek Reservoir had been filed with TCEQ. My purpose was to share the Notice of Receipt of Application and Intent to Obtain Water Quality Permit from TCEQ, (that only 17 of us homeowners within a half mile radius of the discharge site received). Although public notice requirements were met, the permit application stated that a public involvement plan was not applicable to the situation. The explanation given was, "The new wastewater treatment plant for the Peninsula RV Resort to be located at Hubbard Creek Reservoir is not anticipated to have any significant public interest." The petition proved there was opposition to the approval of the permit by TCEQ, and it showed considerable public interest. The petitioning process has ceased, and the results were submitted to TCEQ for review. I am in hopes that TCEQ holds a public meeting so that we can all have chance to voice our questions and concerns in an organized, civil manner.

I realize that the decision of approving the TPEDS permit is now in the hands of the Texas Commission on Environmental Quality. We are all stakeholders regardless of where we live, or what stand we take on the matter. We live directly across from the discharge site. The letter we received on February 10, 2023, made me challenge myself to decide whether to take a stand for what I believe in, or be silent and deal with the consequences. Taking a stand is

uncomfortable and not enjoyable, but I am doing what I personally feel is right to preserve our lake. If you agree with the permitting and discharge of the treated wastewater into Hubbard Creek Reservoir back it wholeheartedly. If you disagree, submit a public comment in writing to Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, PO Box 13087, Austin, Texas 78711-3087, or electronically to <https://www14.tceq.texas.gov/epic/eComment/>.