

## Summary of BSEACD Position on the TPDES Permit Application by the City of Dripping Springs

*Approved by the Board of Directors on June 30, 2016*

BSEACD's position, based on sound science and good public policy, is that:

1. The BSEACD is an affected party based on 1) the immediate risk of potential adverse impacts to the Trinity Aquifer that is shared by both the Hays Trinity GCD and the BSEACD, and 2) the long-term risk of potential adverse impacts to the Edwards and Trinity Aquifers from the cumulative increasing levels of non-point source pollutant loading and/or future point source wastewater discharges.
2. The proposed permit, if approved, should include conditions and limits that are equivalent to or more protective than the Belterra Permit including, at minimum: creek flow minimums, more stringent effluent limits, a reduced discharge volume, and/or other measures necessary to avoid degradation beyond a *de minimis* level.
3. Recognizing there is a growing demand for water supply and that high quality effluent can be as source of supply to accommodate that demand, the City of Dripping Springs should join ongoing efforts to maximize the beneficial reuse of treated effluent by advocating for 1) sensible reductions in TCEQ effluent storage and land application area requirements and 2) firm-demand types of beneficial reuse within the City and the ETJ;
4. On the basis of the consensus, qualitative wastewater-management standards previously established in developing HB 2046, a higher level of treatment of the wastewater to be discharged to Onion Creek should be required, including more effective nutrient removal, so that the effluent is treated to a standard that doesn't:
  - a. exceed the primary and secondary drinking-water standards established by TCEQ,
  - b. contribute to toxic effects on aquatic life in Onion Creek,
  - c. contribute to adverse toxic effects on human health from consuming water or aquatic organisms in the creek or from contact with the creek water, and
  - d. increase the nutrient concentrations in Onion Creek during non-storm conditions beyond *de minimis* levels;
5. There are other proven alternatives available to reduce the potential volume of water required to be directly discharged that should be assessed. For example, further evaluation of Direct Potable Reuse (DPR) through a system of decentralized advanced-level treatment plants should be undertaken by the City of Dripping Springs. This would not only reduce

risks of in-stream water quality impairment, but also provide a reliable new water supply for the City that could be scaled up with growing demand. As part of this evaluation, the efficacy of SWIFT funding to defray capital costs of DPR should be examined in coordination with the Regional Water Planning Groups. It also should be confirmed that DPR is a full-time alternative water supply not requiring alternative disposal methods, rather than an episodic Chapter 210 re-use strategy, which would require storage and alternative disposal under a TPDES/TLAP permit;

6. Beneficial impacts associated with the replacement of the existing system of “package sewage treatment plants” would be offset by impacts of the larger wastewater volumes and the increased development intensity that the relatively large-scale centralized regional plant, as proposed, would promote.
7. Current regional water supplies must be maintained at a quality protective of designated stream segment uses, including public water supply and aquifer protection, before advancing the benefits of the proposed effluent as an augmented downstream water supply;
8. Hays Trinity GCD and BSEACD should work collaboratively and expeditiously to determine the potential impacts of the direct discharge on public (including those of the City of Dripping Springs) and private drinking-water supply wells in the Trinity Aquifer. A draft TPDES permit should not be issued until the planned study is able to be completed to better inform the potential risk and likely magnitude of impacts to the Trinity Aquifer as an important source of water supply in the area.