Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 22, 2016

CERTIFIED MAIL 91 7199 9991 7036 0227 2942
RETURN RECEIPT REQUESTED

Mr. Scott Halty
Director of Resource Protection and Compliance
San Antonio Water System (SAWS)
2800 US Hwy 281 North
PO Box 2449
San Antonio, TX 78298-2449

Received
AUG 24 2016
6EN-W

Re: Notice of Violation for the Unauthorized Discharge of Wastewater at:
107-111 Yolanda Drive, San Antonio (Bexar County) Texas
Regulated Entity No.: RN102182664, TPDES Permit No. WQ0010137003
CN600529069

Dear Mr. Halty:

On June 4 and June 10, 2016, Ms. Azaria Espinoza of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for wastewater collections. Enclosed is a summary which lists the investigation findings. During the investigation, a concern was noted which was an alleged noncompliance that has been resolved as an Area of Concern based on subsequent corrective action. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violation. Therefore, no further action is required.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at http://www.tceq.state.tx.us for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at 210-490-3096 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements.

If you or members of your staff have any questions, please feel free to contact Ms. Espinoza in the San Antonio Region Office at 210-490-3096.

Sincerely,

Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/AE/adj

cc: Mr. Sandy VanCleave, TCEQ OCE, Enforcement Division, MC 169
Mr. James Sallans, TCEQ OLS, Litigation Division, MC 175
Mr. Ted Palit, EPA Region 6, Biosolids Coordinator, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733
Ms. Judy Edelbrock, EPA Region 6, Biosolids Coordinator, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

LEON CREEK WATER RECYCLING CENTER WASTEWATER
1104 MAUERMANN RD
SAN ANTONIO, BEXAR COUNTY, TX 78224

Investigation # 1343197
Investigation Date: 06/04/2016

Additional ID(s): WQ0010137003

AREA OF CONCERN

Track No: 609040

2D TWC Chapter 26.121(a)(1)
2D TWC Chapter 26.121(c)
30 TAC Chapter 305.125(1)

PERMIT WQ0010137033, WQ0010137033, Permit Condition No.2.g
There shall be no unauthorized discharge of wastewater or any other waste. For the purpose of this permit, an unauthorized discharge is considered to be any discharge of wastewater into or adjacent to water in the state at any location not permitted as an outfall defined in the Special Provisions section of this permit.

Alleged Violation:
Investigation: 1343197 Comment Date: 07/08/2016

Failure of the RE to prevent unauthorized discharge of wastewater or any other waste into or adjacent to water in the state at any location not permitted as an outfall.

On June 3, 2016 the San Antonio Water System (SAWS) contacted the Texas Commission on Environmental Quality (TCEQ) San Antonio Region office to report a sanitary sewer overflow (SSO) of sewage. The notification reported approximately 100,000 gallons of sewage was released onto land and eventually entering Zarzamora Creek. The incident location to where the SSO occurred was 107-111 Yolanda Drive in San Antonio, Texas.

On June 4 and June 10, 2016, an on-site SSO investigation was conducted.

Recommended Corrective Action: SAWS entered into a Consent Decree, CA No. 5:13-cv-00666-DAE, with the United States Environmental Protection Agency (EPA) effective October 15, 2013. This violation is being addressed in accordance with the consent decree.

Resolution: This violation had been resolved as an Area of Concern based on the subsequent corrective action. Based on the information provided, the TCEQ has adequate documentation to resolve this AOC.

On June 7, 2016, SAWS submitted a Water Quality Noncompliance 5 Day Report to the San Antonio Region office. The report stated that the SSO event started on June 2, 2016 at 0930 hours, and ended on June 4, 2016, at 0300 hours. The volume of the spill was estimated at 342,215 gallons of domestic wastewater.

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Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 22, 2016

CERTIFIED MAIL 91 7199 9991 7036 0227 2959
RETURN RECEIPT REQUESTED

Mr. Scott Halty
Director of Resource Protection and Compliance
San Antonio Water System (SAWS)
2800 US Hwy 281 North
PO Box 2449
San Antonio, TX 78298-2449

Received
AUG 24 2016
6EN-W

Re: Notice of Violation for the Unauthorized Discharge of Wastewater at:
602 W Huisache Avenue, San Antonio (Bexar County) Texas
Regulated Entity No.: RN103119020, TPDES Permit No. WQ0010137033
EPA ID No.: TX0077801; CN600529069

Dear Mr. Halty:

On June 4 and June 10, 2016, Ms. Azaria Espinoza of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for wastewater collections. Enclosed is a summary which lists the investigation findings. During the investigation, a concern was noted which was an alleged noncompliance that has been resolved as an Area of Concern based on subsequent corrective action. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violation. Therefore, no further action is required.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at http://www.tceq.state.tx.us for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at 210-490-3096 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements.

If you or members of your staff have any questions, please feel free to contact Ms. Espinoza in the San Antonio Region Office at 210-490-3096.

Sincerely,

Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/AE/adj

cc: Mr. Sandy VanCleave, TCEQ OCE, Enforcement Division, MC 169
Mr. James Sallans, TCEQ OLS, Litigation Division, MC 175
Mr. Ted Palit, EPA Region 6, Biosolids Coordinator, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733
Ms. Judy Edelbrock, EPA Region 6, Biosolids Coordinator, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

DOS RIOS WATER RECYCLING CENTER

Investigation # 1343291
Investigation Date: 06/04/2016

, BEXAR COUNTY,

Additional ID(s): WQ0010137033

AREA OF CONCERN

Track No: 609028
2D TWC Chapter 26.121(a)(1)
2D TWC Chapter 26.121(c)
30 TAC Chapter 305.125(1)

PERMIT WQ0010137033, WQ0010137033, Permit Condition No. 2.g
There shall be no unauthorized discharge of wastewater or any other waste. For the purpose of this permit, an unauthorized discharge is considered to be any discharge of wastewater into or adjacent to water in the state at any location not permitted as an outfall defined in the Special Provisions section of this permit.

Alleged Violation:
Investigation: 1343291 Comment Date: 07/08/2016

Failure of the regulated entity (RE) to prevent unauthorized discharge of wastewater or any other waste into or adjacent to water in the state at any location not permitted as an outfall.

On June 3, 2016 the San Antonio Water System (SAWS) contacted the Texas Commission on Environmental Quality (TCEQ) San Antonio Region office to report a sanitary sewer overflow (SSO) of sewage that occurred on June 2, 2016. The notification reported approximately 100,000 gallons of sewage was released onto land. The incident location to where the SSO occurred was 602 W. Huisache in San Antonio, Texas.

On June 4 and June 10, 2016, an on-site investigation of the SSO was conducted.

Recommended Corrective Action: SAWS entered into a Consent Decree, CA No. 5:13-cv-00666-DAE, with the United States Environmental Protection Agency (EPA) effective October 15, 2013. This violation is being addressed in accordance with the consent decree.

Resolution: This violation had been resolved as an Area of Concern (AOC) based on the subsequent corrective action. Based on the information provided, the TCEQ has adequate documentation to resolve this AOC.

On June 7, 2016, SAWS submitted a Water Quality Noncompliance 5 Day Report. The report stated that the SSO event started on June 2, 2016, at 0822 hours and ended on June 3, 2016, at 0422 hours. The volume of the spill was estimated at 96,900 gallons of domestic wastewater.

PDF-V

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 30, 2016

CERTIFIED MAIL 91 7199 9991 7036 8501 9199
RETURN RECEIPT REQUESTED

Mr. Scott Halty
Director of Resource Protection and Compliance
San Antonio Water System (SAWS)
2800 US Hwy 281 North
PO Box 2449
San Antonio, TX 78298-2449

Re: Notice of Violation for the Unauthorized Discharge of Wastewater at:
700 Holbrook Road to 300 Ira Lee Street, San Antonio, Bexar County
Regulated Entity No.: RN100851518, TCEQ ID No.: 10137008, EPA ID No.: TX0052647
Investigation Nos. 1358157 and 1358160

Dear Mr. Halty:

On August 15 and 22, 2016, Remington Burklund of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted compliance investigations of the above-referenced regulated entity to evaluate compliance with applicable requirements for wastewater collection. Enclosed are summaries which list each investigation's findings. During the investigations, concerns were noted which were alleged noncompliances that have been resolved as Area of Concerns based on subsequent corrective actions. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violations. Therefore, no further action is required.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at http://www.tceq.state.tx.us for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at 210-490-3096 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements.

If you or members of your staff have any questions, please feel free to contact Remington Burklund in the San Antonio Region Office at 210-490-3096.

Sincerely,

Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/RB/adj

cc: Mr. Sandy VanCleave, TCEQ OCE, Enforcement Division, MC 169
Mr. James Sallans, TCEQ OLS, Litigation Division, MC 175
Mr. Ted Palit, EPA Region 6, Biosolids Coordinator, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733
Ms. Judy Edelbrock, EPA Region 6, Biosolids Coordinator, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733

Enclosure: Summary of Investigation Findings Nos. 1358157 and 1358160

Summary of Investigation Findings

SALADO CREEK WATER RECYCLING
13496 BLUE WING RD
SAN ANTONIO, BEXAR COUNTY, TX 78223

Investigation # 1358157
Investigation Date: 08/16/2016

Additional ID(s): TX0052647
WQ0010137008

AREA OF CONCERN

Track No: 617469
2D TWC Chapter 26.121(a)(1)
30 TAC Chapter 305.125(1)

PERMIT WQ0010137008, Permit Condition No. 2.g.
There shall be no unauthorized discharge of wastewater or any other waste. For the purpose of this permit, an unauthorized discharge is considered to be any discharge of wastewater into or adjacent to water in the state at any location not permitted as an outfall defined in the Special Provisions section of this permit.

Alleged Violation:
Investigation: 1358157

Comment Date: 09/09/2016

Failure to prevent unauthorized discharges of wastewater or any other waste into or adjacent to water in the state at any location not permitted as an outfall.

The San Antonio Water System (SAWS) contacted the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office on August 15, 2016, to report a sanitary sewer overflow (SSO) of sewage that began on August 15, 2016, from sewer collection system manholes adjacent to Salado Creek crossing underneath the Rittman Road overpass and along Holbrook Road to Ira Lee Street. The SSO was estimated to be approximately 800,675 gallons of sewage entering Salado Creek, Segment 1910. The discharge was caused by inflow and infiltration during a storm event.

Recommended Corrective Action: SAWS entered into a Consent Decree, CA No. 5:13-cv-00666-DAE, with the United States Environmental Protection Agency (EPA) effective October 15, 2013. This violation is being addressed in accordance with the consent decree.

Resolution: This violation has been resolved as an Area of Concern based on subsequent corrective action and documentation received by the TCEQ.

Summary of Investigation Findings

SALADO CREEK WATER RECYCLING
13496 BLUE WING RD
SAN ANTONIO, BEXAR COUNTY, TX 78223

Investigation # 1358160
Investigation Date: 08/22/2016

Additional ID(s): TX0052647
WQ0010137008

AREA OF CONCERN

Track No: 617501
2D TWC Chapter 26.121(a)(1)
30 TAC Chapter 305.125(1)

PERMIT WQ0010137008, Permit Condition No. 2.g.
There shall be no unauthorized discharge of wastewater or any other waste. For the purpose of this permit, an unauthorized discharge is considered to be any discharge of wastewater into or adjacent to water in the state at any location not permitted as an outfall defined in the Special Provisions section of this permit.

Alleged Violation:
Investigation: 1358160 Comment Date: 09/07/2016

Failure to prevent unauthorized discharges of wastewater or any other waste into or adjacent to water in the state at any location not permitted as an outfall.

The San Antonio Water System (SAWS) contacted the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office on August 22, 2016, to report a sanitary sewer overflow (SSO) of sewage that began on August 21, 2016, from sewer collection system manholes adjacent to Salado Creek crossing underneath the Rittman Road overpass and along Holbrook Road to Ira Lee Street at Tobin Park. The SSO was estimated to be more than 100,000 gallons of sewage entering Salado Creek, Segment 1910. The discharge was caused by inflow and infiltration during a storm event.

Recommended Corrective Action: SAWS entered into a Consent Decree, CA No. 5:13-cv-00666-DAE, with the United States Environmental Protection Agency (EPA) effective October 15, 2013. This violation is being addressed in accordance with the consent decree.

Resolution: This violation has been resolved as an Area of Concern based on subsequent corrective action and documentation received by the TCEQ.

PDF ✓

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 4, 2016

CERTIFIED MAIL 91 7199 9991 7036 8501 9205
RETURN RECEIPT REQUESTED

Mr. Scott Halty
Director of Resource Protection and Compliance
San Antonio Water System (SAWS)
2800 US Hwy 281 North
PO Box 2449
San Antonio, Texas 78298-2449

Re: Notice of Violation for Compliance Investigation at: SAWS Dos Rios Creek Wastewater Recycling Center's Sewage Collection System, located near the intersections of South Flores and Cass Avenue, South Flores and Mitchell Street, and at 1135 Mission Road, San Antonio, Bexar County, Texas
Regulated Entity No.: RN103119020, TCEQ ID No.: WQ0010137033, EPA ID No.: TX0077801, Investigation No. 1344463

Dear Mr. Halty:

On May 20, June 10, and July 8, 2016, Javier Anguiano of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for wastewater collection. Enclosed is a summary which lists the investigation findings. During the investigation, a concern was noted which was an alleged noncompliance that has been resolved as an Area of Concern based on subsequent corrective action. Based on the information you have provided, the TCEQ has adequate documentation to resolve the alleged violation. Therefore, no further action is required.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at http://www.tceq.state.tx.us for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the San Antonio Region Office at (210) 490-3096 or the Central Office Publications Ordering Team at (512) 239-0028. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violation as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the San Antonio Region Office within 10 days from the date of this letter. At that time, Water Section Manager, Ms. Lynn Bumguardner will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the

violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of the contested violation.

If you or members of your staff have any questions, please feel free to contact Mr. Javier Anguiano in the San Antonio Region Office at (210) 403-4019.

Sincerely,

Joy Thurston-Cook, Water Section Team Leader
San Antonio Region Office
Texas Commission on Environmental Quality

JTC/JA/adj

cc: Mr. Sandy VanCleave, TCEQ OCE, Enforcement Division, MC 169
Mr. James Sallans, TCEQ OLS, Litigation Division, MC 175
Mr. Ted Palit, EPA Region 6, Biosolids Coordinator, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733
Ms. Judy Edelbrock, EPA Region 6, Enforcement Branch, 1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

DOS RIOS WATER RECYCLING CENTER

Investigation # 1344463
Investigation Date: 05/20/2016

, BEXAR COUNTY,

Additional ID(s): WQ0010137033
R10137033
TX0077801

AREA OF CONCERN

Track No: 618951

2D TWC Chapter 26.121(a)
2D TWC Chapter 26.121(c)
30 TAC Chapter 305.125(1)

PERMIT WQ0010137033, Permit Condition No. 2.g
There shall be no unauthorized discharge of wastewater or any other waste. For the purpose of this permit, an unauthorized discharge is considered to be any discharge of wastewater into or adjacent to water in the state at any location not permitted as an outfall defined in the Special Provisions section of this permit.

Alleged Violation:
Investigation: 1344463 Comment Date: 09/23/2016

Failure to prevent unauthorized discharges of wastewater or any other waste into or adjacent to water in the state at any location not permitted as an outfall.

Unauthorized discharges of wastewater from sanitary sewer overflows (SSOs) occurred on May 19 from multiple manholes (MHs) located on Cass Avenue and Mitchell Street, and on May 19 - 20, 2016 from a siphon box located in front of 1135 Mission Rd. It was reported that the two events resulted in approximately 183,300 gallons of sewage entering into San Pedro Creek and 146,625 gallons of sewage entering into the San Antonio River. A total of 329,925 gallons of sewage entered into water in the state within Stream Segment 1911 of the San Antonio River Basin. The SSOs were caused by inflow and infiltration into the SCS during a storm event.

Recommended Corrective Action: SAWS entered into a Consent Decree, CA No. 5:13 cv 00666 DAE, with the United States Environmental Protection Agency (EPA) effective October 15, 2013. This violation is being addressed in accordance with the consent decree.

Resolution: This violation has been resolved as an Area of Concern based on subsequent corrective action and documentation received by the TCEQ.