

Rucker Creek Discharge Versus Alternatives

Note: The following section contains a comparison of the Rucker Creek effluent discharge route versus an alternative discharge to the main body of the Brazos River, where it can be more safely diluted and dispersed. A sub-section is also included on a consideration of the South Plant Alternative, as well as a section on the benefits of applying for a TLAP permit, rather than a discharge permit.

KEY POINTS:

- The proposed effluent discharge route down Rucker Creek—a Primary Contact Recreation water body for hundreds of families, including young children—poses significant health, environmental and economic risks. Rucker Creek is a narrow, shallow, winding creek where the wastewater and its contaminants cannot be adequately diluted and dispersed, as they would be, if discharged directly the main body of the Brazos. The likely impacts of the proposed WWTP location include, but are not limited to:
 1. High risk of another Golden Algae Bloom and fish kill (see next section for details);
 2. Significant negative impacts to the environment—particularly endangered species, wildlife, and aquatic life along Rucker Creek—a High Aquatic Life water body;
 3. High risk of failing the required WWTP bio-monitoring tests, resulting in costly toxicity-reduction evaluations and expensive controls.
 4. Potential Water Quality Standard Violations resulting from *E. coli* growth in a shallow stream that lacks proper dilution/dispersion capability; lack of compliance with the adopted Lake Granbury WPP *e.coli* Standards, thus hindering WPP advantages in acquiring future competitive water quality-related grants and loan applications;
 5. Creating the need for highly stringent criteria (e.g. multiple Category A licensed operators, rigorous EOP development, etc.) for the proposed WWTP, as a result of the severe consequences of discharging effluent-dominant treated wastewater into a popular recreational creek, where children swim and engage in numerous contact recreational activities; and
 6. Triggering the need for special studies to be conducted, prior to final permitting, including the relationship between *E. coli* and *Naegleria fowleri* in Rucker Creek.
- Noxious odors from the proposed WWTP will negatively impact a very densely-populated area of schools, parks, recreational facilities, and established homes.
- It is not necessary build a new WWTP at this time, since expansion of the existing South WWTP alternative is possible and highly cost-effective.
- When a new WWTP is needed, it should be in keeping with NCTCOG recommendations for regional economy-of-scale facilities and should include the consideration of a TLAP permit, rather than a TPDES discharge permit. In keeping with community needs. A TLAP permit will protect the water bodies, can generate revenue, and will preserve the public drinking water for future generations.