Compliance and enforcement for municipal wastewater discharge permits within the Texas Hill Country

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Many municipalities in the 17-county Hill Country dispose of their wastewater effluent by discharge into nearby streams. The Texas Commission on Environmental Quality issues permits for such discharges. The U.S. Environmental Enforcement Agency maintains a database of enforcement and compliance history for all facilities regulated by the agency. The site is https://echo.epa.gov and presents compliance and enforcement data for all facilities regulated by the EPA. The data in the table below represent, for the Hill Country area, every municipal wastewater discharge facility as existed on September 22, 2018. The site documents 48 municipal wastewater facilities in the Hill Country--147 outfalls exist for the facilities https://tceq.maps.arcgis.com/apps/webappviewer/index.html?id=d47b9419f42c49dea592203aeda99da1. It is believed that several facilities are not in the database thus the table should be considered inconclusive.

The bottom of the table presents total values for the data in the columns. Based on the data in the table, the following summaries are presented:

- The permitted discharge for the facilities totals about 303 million gallons per day, which is about 9 times greater than the mean flow from Barton Springs.
- Three of the facilities (in Kerrville, Pflugerville, and Sabinal) were non compliant in meeting the permit specifications during 11 of the 12 quarters during the past 3 years.
- 31 of the 48 facilities were non compliant as of September 22, 2018.
- During the past 3 years, the facilities in Kyle and Uvalde had the most quarters with significant violations--7 and 6 respectively.
- During the past 3 years, the three facilities in New Braunfels, and the facility in Kyle and Pflugerville had the most number of effluent violations with 129, 50 and 36 respectively.
- About 1/3 of the facilities (15 of 48) had only one on-site inspection during the past 5 years.
- During the past 3 years, the 48 facilities had 411 violations, an average of 8.6 violations per facility.
- Despite 411 violations in the past 3 years, only 38 formal enforcement actions were issued during the past 5 years.

Compliance and enforcement data for 48 permitted Hill Country municipal wastewater discharge facilities

Data from www.echo.epa.gov as retrieved on September 22, 2018

			Permit discharge	Quarters non compliant	Current permit	Quarters with Significant ¹ violations	Number of effluent violations	On site inspections	Formal enforcement actions
Facility Name	City	County	mgd	last 3 years	violation	last 3 years	last 3 years	last 5 years	last 5 years
CITY OF BANDERA WWTF	BANDERA	Bandera	0.28	7	Yes	0	3	1	1
DOS RIOS WATER RECYCLING CTR.	SAN ANTONIO	Bexar	46.00	0	No	0	13	7	1
SALATRILLO CREEK WWTP	SAN ANTONIO	Bexar	5.83	7	Yes	0	12	2	1
MARTINEZ II WWTP	SAN ANTONIO	Bexar	2.00	7	No	0	9	2	-
ODO J. RIEDEL REGIONAL WWTP	BEXAR CNTY	Bexar	6.20	5	No	0	4	1	1
MITCHELL LAKE WWTF	SAN ANTONIO	Bexar	unknown	2	No	0	19	5	2
MEDIO CREEK WATER RECYC. CTR	SAN ANTONIO	Bexar	8.50	1	Yes	0	0	2	1
LEON CREEK WATER RECYCLING	SAN ANTONIO	Bexar	46.00	2	Yes	1	1	4	1
UPPER MARTINEZ CREEK WWTF	SAN ANTONIO	Bexar	2.21	1	No	0	1	2	-
MARTINEZ IV WWTP	SAN ANTONIO	Bexar	2.00	0	No	0	0	2	-
SALADO CREEK WATER RECYC.CTR	SAN ANTONIO	Bexar	36.00	1	Yes	0	0	2	1
SOMERSET WWTP	SOMERSET	Bexar	0.32	6	Yes	0	0	1	-
HIGHWAY 181 SOUTH WWTP	SAN ANTONIO	Bexar	0.09	2	No	0	2	2	-
MARTINEZ III WWTF	SAN ANTONIO	Bexar	0.15	1	Yes	0	1	1	-
JOHNSON CITY WWTP	JOHNSON CITY	Blanco	0.30	9	Yes	1	8	2	1
CITY OF BLANCO WWTP	BLANCO	Blanco	0.23	4	Yes	3	8	1	-
CITY OF BURNET WWTF	BURNET	Burnet	1.70	0	No	0	0	2	1
GRUENE ROAD RECLAMATION	NEW BRAUN.	Comal	4.90	10	Yes	5	30	2	2
SOUTH KUEHLER WWTF	NEW BRAUN.	Comal	4.20	8	Yes	3	41	3	2
CANYON PARK ESTATES WWFT	COMAL CNTY	Comal	0.10	0	No	0	0	1	-
NORTH KUEHLER WWTP	NEW BRAUN.	Comal	3.10	8	Yes	4	58	3	2
CITY OF ROCKSPRINGS WWTP	ROCKSPRINGS	Edwards	0.13	5	Yes	3	7	1	-
CITY OF BUDA WWTF	BUDA	Hays	1.50	6	Yes	0	2	3	-
CITY OF SAN MARCOS WWTF	SAN MARCOS	Hays	9.00	7	No	4	7	4	2
A & M HEEP WWTP	HAYS COUNTY	Hays	0.25	7	Yes	0	0	2	-
CITY OF KYLE WWTP	KYLE	Hays	1.50	8	Yes	7	50	3	3
ESPERANZA WWTP	KENDALL CNTY	Kendall	0.40	0	No	0	0	1	-
CITY OF BOERNE WWTP	BOERNE	Kendall	1.20	3	Yes	0	2	3	-
COMFORT WWTF	COMFORT	Kendall	0.53	0	No	0	0	1	-

Facility Name	City	County	Permit discharge mgd	Quarters non compliant last 3 years	Current permit violation	Quarters with Significant ¹ violations last 3 years	Number of effluent violations last 3 years	On site inspections last 5 years	Formal enforcement actions last 5 years	
BOERNE WWT AND RECYCLING	BOERNE	Kendall	1.40	4	Yes	0	o	3	3	
CITY OF KERRVILLE WWTF	KERRVILLE	Kerr	4.50	11	Yes	1	7	2	-	
CITY OF JUNCTION WWTP	JUNCTION	Kimble	0.28	4	Yes	1	21	2	2	
KINGSLAND MUD - WWTF	KINGSLAND	Llano	0.75	5	Yes	0	9	1	-	
CITY OF MASON WWTP	MASON	Mason	unknown	6	Yes	2	8	3	1	
HONDO WWTP	HONDO	Medina	1.80	7	Yes	4	0	2	1	
CITY OF NATALIA WWTP	NATALIA	Medina	0.19	2	No	0	0	1	-	
CITY OF LA COSTE WWTP	LA COSTE	Medina	0.20	4	Yes	0	1	4	1	
MEDINA COUNTY WCID 2 WWTF	MEDINA CNTY	Medina	0.08	5	Yes	1	3	1	-	
CITY OF DEVINE WWTP	DEVINE	Medina	0.65	6	Yes	0	1	1	-	
THOROUGHBRED FARMS WWTP	AUSTIN	Travis	0.07	2	No	0	1	1	-	
WILD HORSE RANCH WWTP	AUSTIN	Travis	0.75	3	No	0	4	1	-	
CITY OF AUSTIN (WALNUT CREEK)	AUSTIN	Travis	25.00	7	Yes	0	4	2	-	
WILBARGER CREEK WWTP	MANOR	Travis	0.50	9	Yes	0	10	2	1	
SOUTH AUSTIN REGIONAL WWTF	AUSTIN	Travis	75.00	3	No	0	6	7	2	
UPPER GILLELAND CREEK WWTP	PFLUGERVILLE	Travis	4.40	11	Yes	4	36	2	3	
TAYLOR LANE WWTF	AUSTIN	Travis	0.10	0	No	0	0	-	-	
CITY OF SABINAL WWTP	SABINAL	Uvalde	0.34	11	Yes	3	5	2	-	
CITY OF UVALDE WWTF	UVALDE	Uvalde	2.44	8	Yes	6	17	2	2	
	TOTALS		303.058	225	31 yes	53	411	105	38	
			mgd	out of 576				15		
				total quarters				inspected		
							once in 5 yrs			

¹ Violations by point source dischargers of sufficient magnitude or duration to be a regulatory priority.

Detailed descriptions for column headings at https://echo.epa.gov/help/facility-search/water-search-results-help#results