



June 9, 2015

U.S. Department of Justice
Environmental Enforcement Section
Environment and Natural Resources Division
P.O. Box 7611
Washington, D.C. 20044-7611

Via U.S. Certified Mail
RRR# 7014 3490 0002 0783 3595

Re: DOJ Case No. [90-5-1-1-09215]

Consent Decree

Date of Entry: October 15, 2013

CA No. 5:13-cv-00666-DAE, United States of America and State of Texas v. San Antonio Water System, in the United States District Court for the Western District of Texas, San Antonio Division

Dear Sir/Madam:

Section 12 b. of the above-referenced Consent Decree requires that within 90 days after Lodging the San Antonio Water System shall provide a copy of any five-day report submitted under its TPDES permits to the United States Environmental Protection Agency at the same time the report is submitted to the Texas Commission on Environmental Quality. A copy of a five-day report submitted to TCEQ on June 9, 2015 is attached and is provided in compliance with Consent Decree requirements.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in blue ink that reads "Jeffrey J. Haby".

Jeffrey J. Haby, P.E.

Senior Director – Sewer System Improvements

Enc. as stated



June 9, 2015

U.S. Environmental Protection Agency, Region VI
Chief, Water Enforcement Branch (6EN-W)
Compliance Assurance and Enforcement Division
1445 Ross Avenue
Dallas, TX 75202-2733

Via U.S. Certified Mail
RRR# 7014 3490 0002 0783 3588

U.S. Environmental Protection Agency, Region VI
Attn: Ms. Judy Edelbrock (6EN-W)
Environmental Protection Specialist
Enforcement Branch
1445 Ross Avenue
Dallas, TX 75202-2733

Via U.S. Certified Mail
RRR# 7014 3490 0002 0783 3588

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Jeffrey J. Haby, P.E.
Senior Director – Sewer System Improvements

Enc. as stated

Water Quality Noncompliance Notification

REVISED: 05/28/15

X Unauthorized Discharge of Wastewater Reportable Effluent Violation Other

General Information

Entity Name: San Antonio Water System Telephone No.: (210) 233-3274
X Permitte Subscriber

TCEQ Region: 13 County: Bexar Permit Number: 10137-003-Leon Creek

Noncompliance Summary

Description of Noncompliance (include location, discharge route, and estimated volume if an unauthorized discharge):
The address of the spill was at 23500 IH 10 West (FERG 127F4) - Over the Edwards Aquifer Contributing Zone. Approximately 417,000 Gallons Comingled with Rainwater Spilled into Leon Creek
MH #79942 spilled 327,000 gallons, MH# 506230 spilled 90,000 gallons, Sewer Main 68541 - 67204 did not spill as indicated on previous report. Therefore Total Gallons Spilled = 417,000.
SR# 874608; INSPT# N/A; WO# 1123175; MH 79942 & MH 506230

Cause of Noncompliance: I/I

Duration: Start 5/17/2015 14:00 End 5/18/2015 17:15
(Date) (Time) (Date) (Time)

Duration: Start 5/19/2015 8:30 End 5/19/2015 16:00
(Date) (Time) (Date) (Time)

Or expected to be Corrected N/A
(Date)

Potential Dangers to Human Health and Safety or the Environment No Significant Dangers, however, the spill occurred over the Contributing Zone. There are no known sensitive features within 1/2 mile of the spill. Three businesses with groundwater wells were notified that are within 1/2 mile of the spill.

Actions Taken

Monitoring Data: Data should be attached or submitted to TCEQ when available.

X yes no Field Measurements
X yes no Laboratory Samples
yes X no Fish Kill, If yes, estimated number killed:

Actions Taken to Mitigate Adverse Effects: The area will be cleaned and disinfected after the line is repaired.

Actions Taken to Correct the Problem and Prevent Recurrence: The 24" sewer main was televised on 05/22/15 and found to be in good condition. Apparently the bubbling is some sort of natural spring or weep. Rags were removed from the LS submersible pumps and their performance was much improved

Verification Information

Information Reported By: Jeffrey J. Haby Senior Director
(Name) (Title)

Date Reported: 5/18/2015 Signature: [Handwritten Signature] 6-5-2015
Date Revised: 5/28/2015

TCEQ 0501 (November 5, 2002) *If the noncompliance is an unauthorized discharge from a wastewater collection system, use the permit number of the treatment plant to which the collection system is tied.

TCEQ Region 13 Phone: 490-3096 TCEQ Region 13 Fax: 545-4329



June 5, 2015

Ms. Lynn M. Bumguardner
Texas Commission on Environmental Quality
14250 Judson Road
San Antonio, Texas 78233-4480

Re: Water Quality Noncompliance Notification Revision
23500 IH 10 W (05/17/15) - Spill Report Signed 05/22/15
Falcon Center Sanitary Sewer Overflow Report Modification

Dear Ms. Bumguardner:

During the investigation of Leon Creek on 5/19/15, upstream of the Falcon Center lift station a site was located in which there was flow bubbling up from the creek. It was specifically located in an area just immediately upstream from a submerged manhole (67261) in the middle of the creek. The initial reaction was that flow was coming from a concentrated location which was directly over the sewer main location. Sampling for E.coli was done at the location directly in the middle of the flow. In addition, two upstream samples were also collected as a background for comparative purposes. The water was flowing several feet deep in Leon Creek and had a good velocity traveling downstream. A field ammonia sample did not show any presence but the high flow would have caused significant dilution and was inconclusive.



E.coli results showed 100 MPN at both upstream locations (including one that appeared to also be bubbling up from the streambed) and 750 MPN from the flow location in question. Thus the initial conclusion was that there was flow coming up from the sewer line being heavily diluted by storm water. Because of the conclusions, an emergency contract was requested and a contractor mobilized and started bringing in equipment and supplies to start repairs. A road was cleared to allow access to the location behind the apartments and down into the Leon Creek's creek bed.

The flow in the creek abated enough on 5/22/15 to allow a camera truck access to the manholes immediately downstream and the televising found the line (68541 – 67204) to be in good condition with no defects in the area of concern. The bubbling abated with the flow going down below the manhole top level. There was another rain event that brought the Leon Creek back up in elevation but no bubbling was seen on subsequent visits to the location on Sunday. We propose the removal of the previous submitted portion of the total volume that was associated with line segment (68541 – 67204) of 780,000 gallons from the report.

The conclusion is that something in the gravel bar and the high flow velocity caused an upwelling in the creek that gave the unusual appearance of a leak from the sewer. Furthermore the EAA also took several more samples up and downstream of this location and their results came back in the 750 MPN range showing that the range throughout the creek was similar to the upwelling location. Since the E.coli levels were consistent in the area, the sewer main was in good condition and the upwelling stopped after the following rain event, it was concluded that this was an anomaly and should not be included in the 05/22/15 flow calculation that totaled 1,197,000 gallons. The revised total spill volume associated with the Falcon Center lift station that occurred on 5/17/15 should read 417,000 gallons.

Sincerely,



Scott R. Halty, Director
Resource Protection and Compliance Department