



**PLUMMER**

STATEMENT OF QUALIFICATIONS

**PERMIT RENEWALS FOR WASTEWATER  
PLANTS AND JEFFERSON WATER  
TREATMENT PLANT**

**City of Laredo**

June 28, 2024

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City of Laredo Utilities Department  
5816 Daugherty Avenue  
Laredo, TX 78041



**Re: PERMIT RENEWALS FOR WASTEWATER PLANTS AND JEFFERSON WATER TREATMENT PLANT**

Dear Mr. Garcia and Members of the Selection Committee:

Plummer Associates, Inc., (Plummer) is pleased to present our qualifications for the renewal of five Texas Pollutant Discharge Elimination System (TPDES) permits for the City of Laredo (City). Plummer has been providing regulatory services to clients throughout Texas for more than 46 years and to the City for five years. Our extensive experience in serving public sector clients, coupled with our commitment to providing reliable and knowledgeable service, is demonstrated in the enclosed Statement of Qualifications. Our qualifications highlight the depth and breadth of the Water Quality/Permitting Team at Plummer. When you re-select Plummer, you will get:



**Consistent trusted advisors.** Continuity and reliability are important qualities to have in a consultant, especially during times of City staff turnover. Plummer will continue to provide the background information and timely reliability to assist the City with permit applications that support an overall water quality and operations strategy.



**Proven relationships.** Plummer not only knows the City, but we also know the TCEQ staff that will be processing the permit applications and what is important to all sides involved. With a combination like this, Plummer will navigate permit processing as your informed advocate.



**Consistent compliance assistance.** The five TPDES permit applications are all due at about the same time, which is a lot of work to condense into a short schedule. However, we do this regularly, and we have successfully helped you in similar circumstances. For example, in 2020 when the City's six TPDES permit applications were due at about the same time during the height of COVID, Plummer managed to navigate a new way of working and new TCEQ systems to get all six TPDES permit applications submitted to the TCEQ ahead of schedule.



**Regulatory tracking.** Through robust tracking of industry regulations, we help our clients stay ahead of the curve. Our involvement in industry groups, such as NACWA, WEAT, and WaterReuse bring to you our combined knowledge, thus saving you time while delivering solutions that leverage our experience with the City while also looking forward to what is coming.

The Plummer Team renews our dedication to serving the City of Laredo and bringing compliance and regulatory assistance to your permitting projects. Please let us know if you have any questions; otherwise, we are ready to make this project a success.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meg Pierce-Walsh'.

Meg Pierce-Walsh  
Principal-in-Charge  
mpierce-walsh@plummer.com  
512.359.7764

# SECTION 1

## Approach

# SECTION 1 – APPROACH

Without a doubt, the Plummer Water Quality/Permitting Team has the most experience producing and processing multiple wastewater permit applications simultaneously of any team in the business of regulatory consulting support. This experience includes assisting the City of Laredo (City) with preparing and processing Texas Pollutant Discharge Elimination System (TPDES) renewal applications through the Texas Commission on Environmental Quality (TCEQ) for its six wastewater treatment plants (WWTPs) and the Jefferson Water Treatment Plant (WTP) since 2019. Our established working relationship with the City will continue to streamline our processes and facilitate coordination on permit application needs and issues. With a focus on adhering to a schedule, **we are committed to consistently meeting all deadlines.**

We will approach your permit applications based on primary principles that we incorporate into a project from the start to set your project up for success. We will highlight these several principles throughout this SOQ:

- 1. Assign a highly experienced Technical Manager, Jenni, that will work closely with the Project Manager, Tres, to effectively shepherd each application through the permitting process.** Jenni will track the permit applications from start through submittal to make sure specific tasks are being completed on schedule.
- 2. Assign a Technical Lead, Jenni or Alex, for each permit application.** The Technical Lead will be responsible for the day-to-day tasks required for assembling the permit application and its components.
- 3. Collaborate closely with the City so everyone understands the plan.** Tres or Jenni will be in communication with the City to make sure information items are gathered and application gaps filled to keep moving towards a final product.
- 4. Assess the permit application how the TCEQ would.** The Plummer Team consists of former TCEQ permit writers and regulators, who know the TCEQ's processes from start to finish. In addition, the Plummer Team helps our clients every day with permit applications, so our unmatched permitting experience will be used as we develop the City's applications and consider how the information in the applications can be used to develop TPDES permit provisions.
- 5. Coordinate closely with the TCEQ so the City knows what to expect.** Through communication with the TCEQ, we will identify issues early in the process and assist the TCEQ with any questions. This coordination results in efficient permit processing, thus turning the permit applications into reissued TPDES permits.
- 6. Track the permit application as it is processed by the TCEQ.** Jenni has developed a permit tracking system that is continually updated by staff and is then reviewed as a team twice a month. Our tracking system results in careful consideration of the City's permit statuses and identifies when we need to reach out to the TCEQ.
- 7. Review and comment on each draft permit.** When the Plummer Team receives a draft permit, we review each condition and provision, compare it to any permit application requests, provisions we anticipate, and the previous permit. Based on the review, Jenni and Tres will develop comment letters to request permit changes. When needed, the Plummer Team will negotiate appropriate and fair permit provisions on your behalf.

**Plummer's Proven Quality, Approach, and Permit Results for the City**  
 With a history of assisting the City with applications for all five facilities, Plummer offers continuity with no learning curve. Our **proven track record of meeting your deadlines** and our extensive knowledge base results in a **streamlined process, saving time and effort.**





1

## Pre-Application Meeting with the City and Plummer

### Purpose/Activity

- Introduce City of Laredo staff to Plummer staff.
- Discuss anticipated information needs (e.g., effluent sampling, existing WET test results)
- Provide City staff with our anticipated timelines for submittal.

### Special Issues/Concerns

- A conference call can be scheduled with the TCEQ and City staff to discuss any special issues. At your discretion, this meeting could be virtual instead of in-person to save time and money.

2

## Assemble All Necessary Documents for the Submittal of the Applications

### Purpose/Activity

- Plummer staff will review existing application and permitting documents provided by the City to retrieve relevant information.
- Plummer staff will compile a request for information (RFI) that will contain all missing information that is necessary to complete the applications and provide it to City staff.
- A call/meeting may be held between Plummer and City staff to review the RFI(s) if necessary.
- City staff will provide responses to items in the RFI and provide feedback to Plummer.
- City staff will conduct effluent sampling to fulfill the requirements of the application.
- Plummer staff will compile all information available into complete draft applications.

- If requested by the City, Plummer can coordinate with the City's contracted lab to ensure the sampling is performed according to TCEQ requirements.
- Since Plummer has performed these duties for the City in the past, our historical knowledge of City staff and permitting issues will be very useful during this task.

### Quality Assurance Review

- Plummer's Project Manager, Tres Koenings, will coordinate the assembly of the applications.
- Tres will review all work products performed by project engineers and scientists.
- Due to the holiday season, coordination will be very important during this phase to accommodate vacation and holiday scheduling.

**Having assisted the City with previous applications for these facilities, we already possess most of the necessary information, thereby **streamlining the process and saving both time and effort.****



3

## Conduct Sites Visit (If Necessary)

### Purpose/Activity

- If necessary, Plummer staff will visit specific plant(s) of concern. Site visits are not anticipated to be necessary.

### Special Issues/Concerns

- Site visits are not typically necessary when performing permit renewals when there are no major issues or changes at the site.



# 4

## Provide PDF Version of Draft Application to the City for Review and Comment

### Purpose/Activity

- Plummer will provide PDF versions of the completed draft applications for City staff to review.
- City staff will perform a review of all draft application documents and provide comments or revisions to Plummer.

### Quality Assurance Review

- Tres and Plummer's Principal, Meg Pierce-Walsh, will conduct a final review of all draft documents prior to submission to City staff or the TCEQ.



**We bring strong working relationships with City staff who will be overseeing these renewals.**

# 5

## Finalize Permit Applications and Submit to the TCEQ

### Purpose/Activity

- Plummer will make any necessary revisions to the draft application based on the City's comments.
- The City will provide original signature pages and application fee checks prior to application submittal.
- Plummer will produce the final hard copy of the applications and submit them to the TCEQ prior to their respective due dates.

### Quality Assurance Review

- Tres will coordinate with our engineers/scientists to make all necessary revisions to the draft application based on the City's comments.
- Tres will conduct a review of the final applications prior to submission to the TCEQ.
- Meg will conduct a final review of final applications prior to submission to the TCEQ.

### Accelerate Your Permit: The Power of Precision

An accurate application helps to speed up the application processing by reducing the number of questions from the TCEQ.



# 6

## Follow-Up With the TCEQ During Permit Processing

### Purpose/Activity

Plummer will coordinate with the TCEQ throughout the review of the City's applications. Anticipated coordination with the TCEQ includes:

- Respond to any requests for additional information during the TCEQ administrative review process.
- Respond to any requests for additional information during the TCEQ technical review process.
- City staff will also review the draft applications and provide comments.
- Plummer will coordinate with City staff to consolidate comments on the draft permits and compile a draft permit comment letter for submission to the TCEQ.
- We will negotiate permit conditions and limits if necessary to provide practical permit provisions.
- City staff will publish public notices during the application review process.

### Special Issues/Concerns

- Plummer will assist the City with publishing the public notices.
- There will be a total of up to 20 notices between all of the renewal applications.
- Public notice is also required in both Spanish- and English-language newspapers.
- Plummer staff will assist City staff with notice publication if requested.

### Quality Assurance Review

- Tres will coordinate with Plummer Engineers to respond to any requests received from the TCEQ.
- Tres will review all responses between the TCEQ and the City.
- Meg will be consulted as needed.

### Compliance: Meticulous Permit Evaluation and Client-Centric Response

We carefully evaluate the draft permits produced by the TCEQ, discuss with you any issues identified with the draft permit and provide prompt responses to TCEQ permitting staff to address any such issues.

To the last point, we complete the process by reviewing the issued permit to ensure there have been no inadvertent changes to the permit in its finalization by the TCEQ.



Using this management control program, Plummer's Water Quality/ Permitting Team routinely ensures that the renewed TPDES permit is a document that you can work with throughout the ensuing permit term.

# SECTION 2

## Project Organization



# SECTION 2 – PROJECT ORGANIZATION



Our Water Quality/Permitting Team’s expertise combined with our broad regulatory experience will continue to provide you with the client service and technical excellence required to maintain your TPDES permits.

## Lead Firm Information

### YEARS IN BUSINESS/ OFFICE LOCATIONS

#### PLUMMER ASSOCIATES, INC. (PLUMMER)

46 Years

**Fort Worth:** 1320 South University Drive, Suite 300, Fort Worth, Texas 76107 | Phone: 817.806.1700

**Austin:** 8911 N Capital of TX Hwy, Suite 1250, Austin, Texas 78759 | Phone: 512.452.5905



### FIRM OVERVIEW

With more than 220 engineering and scientific professionals and offices in Texas, Florida, Colorado, and Oklahoma, Plummer Associates, Inc. (Plummer) has been dedicated to the planning and design of water and wastewater infrastructure since 1978 – water is what we do every day. Our engineers and scientists have become recognized experts in their fields at the local, state, and national levels. We strive to perform every project in keeping with our core values: unyielding integrity, a passion for service, a caring culture, and technical and quality excellence.

Solving your greatest water challenges inspires us, and our goal is to improve the environment and advance your community through our service to you. To do this, we use state-of-the-art tools and proven processes, balancing sound engineering principles with innovative technology tailored to your needs. From project kick-off through stringent quality control review to a completed project, we focus on developing cost-effective solutions and delivering value in all that we do.

## Our Resources

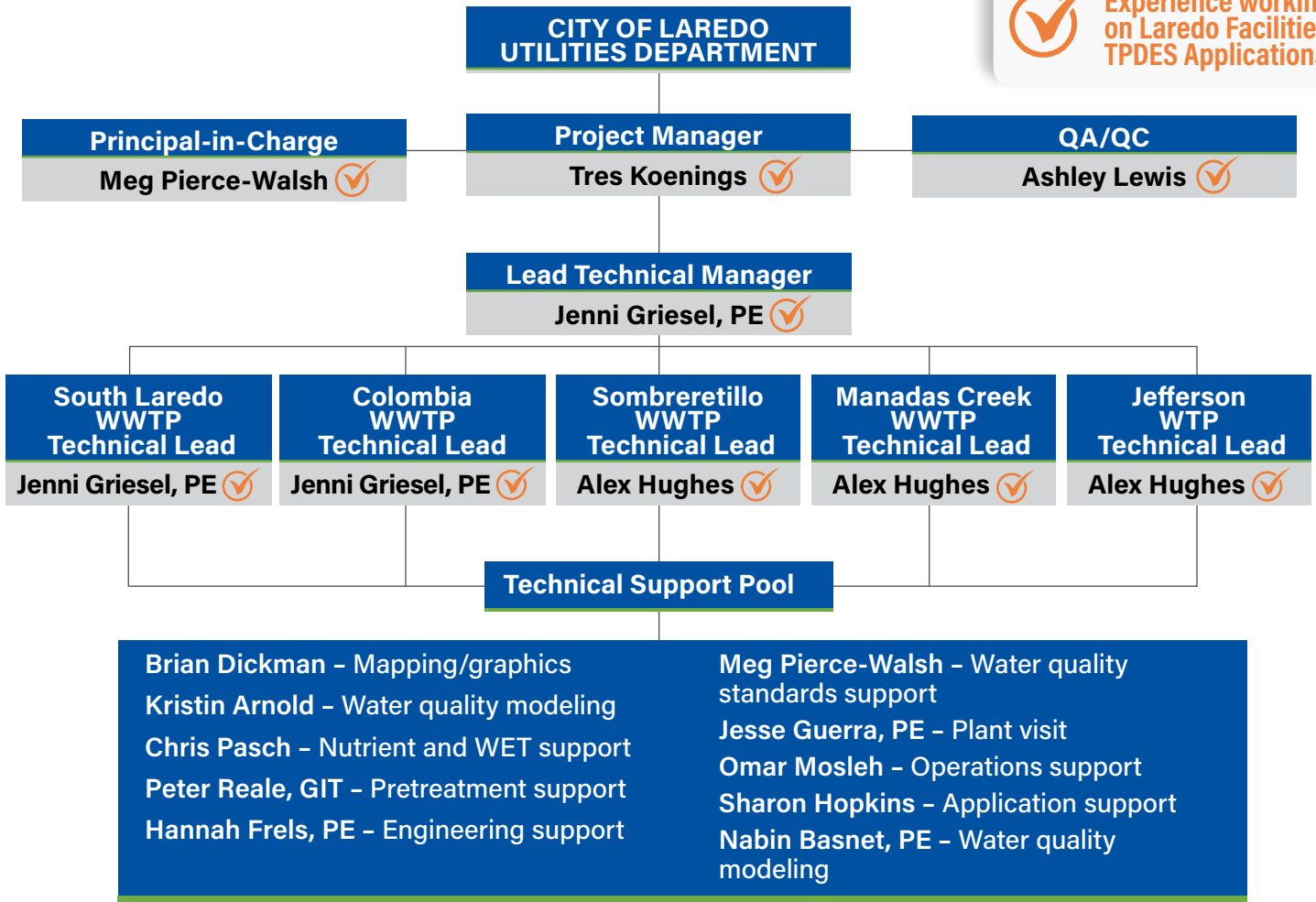
**With unsurpassed experience and expertise, the Water Quality/Permitting Team includes four former TCEQ regulators: a TPDES permit writer, a pretreatment coordinator, a water quality modeler, and a Texas Risk Reduction Program project manager. Furthermore, the team also includes a wetland scientist, a chemist, biologists, geologists, and engineers.**



Based on decades of experience, the team has developed an efficient permitting process that will again benefit you. We will discuss with you the anticipated permit conditions before submitting the application. **Our in-depth knowledge is recognized by TCEQ staff for reliably producing applications that require little to no clarification.** We have all the necessary resources to assess the permit application information as the TCEQ would, including the water quality modeling software QUAL-TX and the pollutant data screening software Textox. We continuously track the application process, provide periodic updates, and initiate check-ins with the TCEQ.

# ORGANIZATIONAL CHART

Plummer's Water Quality/Permitting Team has effectively overseen the City of Laredo's TPDES permit renewals for the last five years, underscoring our comprehensive knowledge of your specific regulatory demands and operational dynamics. Our consistent success in navigating local requirements and ensuring compliance uniquely qualifies us to maintain our commitment to delivering outstanding service and technical excellence for your upcoming permit renewals.



## WHEN YOU RE-SELECT PLUMMER, YOU ARE CHOOSING:



### PROVEN WORKING RELATIONSHIPS.

- ✓ Existing solid relationships with City staff who we will work with on these projects.
- ✓ Proven ability to secure TPDES permits for all Laredo facilities with practical effluent limits and permit conditions.



### TIME-SAVING KNOWLEDGE OF THE PROJECT HISTORY.

- ✓ Demonstrated experience assisting the City with submitting the previous applications for these facilities to the TCEQ ahead of schedule, therefore, we have most of the information necessary for the renewals, thereby saving time and effort.



### DEEP PERMITTING EXPERTISE AND RELATIONSHIPS.

- ✓ Strong relationships with TCEQ staff will help streamline agency review of resources and permit applications.
- ✓ A firm recognized by TCEQ staff for reliably producing applications that require little to no clarification.



## MEG PIERCE-WALSH

### Principal-in-Charge

#### EXPERIENCE:

15 years

#### EDUCATION:

MS, Geological Sciences, University of Minnesota-Duluth

BS, Geological Sciences, University of Minnesota-Duluth

Meg brings extensive experience in water discharge permitting, including TPDES, across various sectors and jurisdictions. Her proven track record includes successfully managing permit applications and regulatory compliance projects for numerous wastewater facilities, ensuring thorough, timely, and accurate submissions.

Meg's deep understanding of TCEQ requirements and her ability to lead collaborative, multi-disciplinary teams make her exceptionally well-suited to serve as Principal for Laredo's TPDES permit renewals, thus delivering streamlined processes and effective solutions.

Meg is Plummer's Environmental Services Leader, a water resources scientist, and a senior project manager. Her expertise includes the Clean Water Act, water discharge permitting, and developing strategic National and Texas Pollutant Discharge Elimination System (NPDES and TPDES) permitting solutions clients in the power, mining, public, and other industrial sectors in more than a dozen states and jurisdictions. She also has experience with developing complex alternative administrative water permitting strategies, planning and implementing watershed-scale baseline studies, managing water permitting and compliance projects, environmental review, and cross-subject matter collaboration. Her passion lies at the intersection of facilitating spaces for teams and clients to develop solutions using collaborative multi-layered problem-solving.

#### REPRESENTATIVE PROJECT EXPERIENCE

**Water and Wastewater Regulatory Support | City of Houston | Principal-in-Charge and Quality Assurance/Quality Control.** Worked with the Plummer project manager to process multiple TPDES permit application major amendments and assist with compliance for the City's drinking water and wastewater programs.

**Regulatory Support Services | Trinity River Authority of Texas | Principal-in-Charge and QA/QC.** Meg has served as Plummer's QA/QC for projects conducted under TRA's regulatory support services contracts for the last two years. Meg has provided QA/QC services for a number of permit applications, industrial stormwater pollution prevention plans, and TCEQ communications for TRA's wastewater treatment facilities.

**New and Expanded Water Reclamation Facilities TPDES Permitting | City of Celina | Project Manager.** As a subconsultant, Plummer assisted the City of Celina with Texas Pollutant Discharge Elimination System (TPDES) permitting for new and expanded water reclamation facilities (WRFs). Meg served as the Plummer project

manager for the project. Meg and her team modeled discharge scenarios for the WRFs and other watershed dischargers and worked with the Texas Commission on Environmental Quality (TCEQ), other consultants, and the City to develop permit applications justifying rapid expansion for the two water reclamation facilities.

**Brushy Creek East Regional Wastewater Treatment Plant Expansion | City of Round Rock | QA/QC and Compliance Support.** Meg provided permitting support for Brushy Creek including support for the expansion to 30 MGD (currently the draft permit has been issued), as well as helping the partners with TCEQ investigations into performance during construction.

**Permit Renewals and Regulatory Support for Multiple Wastewater Facilities | City of Denison | Principal-in-Charge and QA/QC.** Includes two domestic WWTPs; TPDES permit applications and permitting support; Stormwater Pollution Prevention Plan preparation for WWTPs; Municipal Separate Storm Sewer System (MS4) compliance support; Pretreatment Program support; and other compliance support, as necessary for all WWTPs.



## TRES KOENIGS

### Project Manager

#### EXPERIENCE:

22 years

#### EDUCATION:

BS, Resource and Environmental Studies, Southwest Texas State University

#### MEMBERSHIPS:

Water Environmental Association of Texas (WEAT)

Texas Association of Clean Water Agencies (TACWA)

National Association of Clean Water Agencies (NACWA)

Tres brings an intimate understanding of the TPDES renewal process, having successfully completed previous renewals for the City of Laredo's WWTPs and Jefferson WTP. His proactive approach and deep knowledge of Laredo's regulatory environment ensure meticulous compliance and efficient permit processing. With a track record of providing robust technical guidance and unwavering support throughout the application process, he is ideally positioned to manage and streamline your upcoming permit renewals once again.

Tres has over two decades of experience as a project manager, environmental scientist, and regulatory specialist, assisting both municipal and industrial clients with regulatory compliance and wastewater-related permitting projects. This experience includes both working as a wastewater consultant and as a wastewater permit writer at the Texas Commission on Environmental Quality (TCEQ). Tres has extensive experience dealing with environmental rules and procedures both as a regulator and as a consultant. His expertise includes wastewater permitting regulations, preparing and negotiating wastewater discharge permit applications for the Texas Pollutant Discharge Elimination System (TPDES) permitting program, and managing specialized water quality studies.

### REPRESENTATIVE PROJECT EXPERIENCE

**WWTPs and WTP TPDES Permit Application Support | City of Laredo | Project Manager.** Tres assisted the City with **renewing and amending a total of eight TPDES permits for all of the City's WWTPs and the Jefferson WTP.** The project involved producing and processing multiple applications concurrently.

**General Regulatory and TPDES Permit Renewal Assistance | Sandy Creek Energy Station | On-Call/Regulatory Assistance.** Tres provided on-call technical and regulatory assistance to Sandy Creek Energy Station for several years. He produced a renewal application for the TPDES permit, which included generating the application documents, negotiating permit terms with the TCEQ, ensuring compliance with the 40 CFR 423 effluent limitations guideline, aiding with public notice publication, and providing effluent sampling guidance.

**General Regulatory and Evaporation Pond Assistance | Golden Spread Energy Cooperative | On-Call/Regulatory Assistance.** Tres has continued to provide on-call technical and regulatory assistance to the Mustang Station and Elk Antelope

Power Plants operated by GSEC for several years. As part of this duty, Tres assisted GSEC with confirming TCEQ evaporation pond sizing calculations performed during the previous permit renewal. During the review, it was determined that the TCEQ's calculations were incorrect, which led to less stringent permitting requirements for the facility. Tres produced a renewal application for its TPDES permit which included generating the application documents, negotiating permit terms with the TCEQ, aiding with public notice publication, and providing effluent sampling guidance.

**TPDES Permit and Receiving Water Assessment | Magellan Terminals Holdings | Compliance.** Tres has provided on-call technical and regulatory assistance to the Corpus Christi Terminal, owned and operated by Magellan Terminals Holding, LP and Magellan Processing, LP for nearly a decade. Tres has assisted the Corpus Christi Terminal with TPDES permit renewal and amendment applications, compliance guidance, outfall locations determination, and stormwater management.





## ASHLEY LEWIS

### QA/QC

#### EXPERIENCE:

9 years

#### EDUCATION:

MS, Data Analytics,  
University of North  
Texas

BS, Biology, Texas State  
University

#### REGISTRATIONS/ CERTIFICATIONS

GIS Level II

Ashley brings valuable experience from supporting the City of Laredo's previous TPDES permit renewals for its WWTPs and Jefferson WTP. She will again help to ensure meticulous quality assurance and quality control throughout the next renewal process.

With a keen understanding of Laredo's regulatory framework and a commitment to technical excellence, Ashley will review deliverables thoroughly for compliance and streamline the upcoming permit renewal process.

Ashley has experience as a project manager assisting with permitting and regulatory compliance related to National Pollutant Discharge Elimination Systems. She also supports a variety of clients with tracking and evaluating facility compliance, developing industrial stormwater pollution prevention plans, municipal separate storm sewer system (MS4) program evaluations, assessing stormwater infrastructure and best management practices, evaluating surface water quality, and planning waste management. Similarly, Ashley has provided substantial technical support for a wide variety of regulatory issues including stream studies, pretreatment programs, and water quality modeling. Ashley manages and supports a number of permitting and other wastewater and stormwater projects for the Water Quality/Permitting team.

#### REPRESENTATIVE PROJECT EXPERIENCE

**WWTPs and WTP TPDES Permit Application Support | City of Laredo | Technical Lead.** Plummer assisted the City with **renewing and amending a total of eight TPDES permits for all of the City's WWTPs and the Jefferson WTP.** The project involved producing and processing multiple applications concurrently.

**Wastewater Permit Assistance | City of Corpus Christi | Project Scientist.** The projects include a wide range of regulatory assistance and TPDES permitting. Ashley has worked on preparing all six of the City of Corpus Christi's permit applications over the past five years. This includes gathering appropriate information, evaluating analytical data, and preparing required maps. She has worked directly with the TCEQ to obtain the appropriate language in each draft permit. Ashley worked on provided the statistical data analysis for the changes to the Oso Bay water quality standards. This statistical data analysis was taken to EPA headquarters to defend the City's case for the revision to the water quality standards. Ashley has worked with City staff on coordinating a detailed sampling plan for the Laguna Madre Wastewater Treatment Facility.

**Wastewater Assistance and Regulatory Support | City of Houston | Project Manager.** Ashley

has managed the submittal of several major amendment permit applications for the City of Houston's wastewater treatment facilities which included the removal of WET limits and the consolidation and expansion of a wastewater treatment facility. Plummer assists the City of Houston by reviewing draft permit applications. Plummer evaluates effluent data by comparing it the appropriate TexTox menus, total phosphorus menus, and total dissolved solids menus. Ashley has managed the submittal of the renewal for the City of Houston's water treatment plant's residuals disposal sites and completed a compliance review of these permits.

**Regulatory Assistance | San Jacinto River Authority | Project Scientist.** Ashley has provided regulatory assistance to SJRA. Ashley assisted SJRA by providing a technical assessment of three wastewater treatment facilities permit renewals. This included reviewing permit applications and draft permits for SJRA. Ashley was fundamental in strategizing the negotiations with the TCEQ on draft permit language. Ashley also assisted SJRA in developing SWP3s for three wastewater treatment facilities and achieving compliance with the Multi-Sector General Permit.



## JENNI GRIESEL, PE

### Lead Technical Manager and Technical Lead for the South Laredo WWTP and Colombia WWTP

Jenni's experience with Plummer includes permitting support for over 50 domestic wastewater and 8 industrial TPDES permits in Texas, water quality studies, data analytics, geographic information systems (GIS), and pretreatment program support. Her attention to detail and intricate knowledge of TCEQ procedures make her an important asset on this project. She has supported project managers in the development of new, renewal, minor, and major amendment permit actions.

#### EXPERIENCE:

5 years

#### EDUCATION:

BS, Chemical Engineering, Texas Tech University

#### REGISTRATION/ CERTIFICATION:

Texas PE, #150150

#### MEMBERSHIPS:

Central Texas Section of the Water Environment Association of Texas  
Water Environment Federation (WEF)

Jenni's extensive experience in producing permit applications for multiple facilities, including in Laredo, makes her a strong fit to serve as the Lead Technical Manager. Her precise approach ensures compliance with regulatory standards. Jenni's proficiency in managing public notices and draft permits demonstrates her expertise in navigating Laredo's regulatory requirements effectively, positioning her well to oversee the upcoming TPDES permit renewals efficiently.

#### REPRESENTATIVE PROJECT EXPERIENCE

##### WWTPs and WTP TPDES Permit Application Support | City of Laredo | Engineer-in-Training.

Jenni produced permit applications for seven of the City of Laredo's facilities, including an amendment application to authorize a new outfall. For combined TPDES-TLAP applications, she produced cropping plans and groundwater quality reports in addition to the evaluation of possible permit limits. She ensured that the public notices and draft permit contained appropriate language for each facility and coordinated directly with newspaper publishers to fulfill all public notice requirements.

##### Wastewater and Stormwater Regulatory Support | City of Denison | Engineer-in-Training.



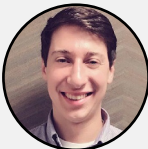
Jenni produced permit applications for both of the City of Denison's wastewater treatment facilities. She evaluated the possibility of permit limits by comparing effluent data to TexTox menus, total dissolved solids menus, and total phosphorus menus. Additionally, she supported compliance with the Stormwater MSGP by visiting both sites and producing Stormwater Pollution Prevention Plans for both facilities.

##### Wastewater Regulatory Support | City of Houston | Engineer-in-Training.

Jenni has produced several major amendment applications for the City of Houston's wastewater treatment facilities, including the removal of WET limits and the consolidation and expansion of a wastewater treatment facility. She evaluates the possibility of permit limits by comparing effluent data to TexTox menus, total dissolved solids menus, and total phosphorus menus. Jenni ensures that the public notices and draft permit contain appropriate language for each facility.

##### Wastewater Regulatory Support | Texas Water Utilities, Inc. | Engineer-in-Training.

Jenni is the primary permit application consultant for Texas Water Utilities, Inc. (formerly SouthWest Water Company), processing 28 applications and counting. She evaluates the possibility of permit limits by comparing effluent data to total dissolved solids menus, ensures that the public notices and draft permit contain appropriate language for each facility, and coordinates directly with newspaper publishers to fulfill all public notice requirements.

NAME ROLE	YRS. EXPERIENCE EDUCATION	EXPERIENCE OVERVIEW	KEY PROJECT EXPERIENCE   ROLE
 <b>Alexandra Hughes</b> Technical Lead – Sombrettillo WWTP, Jefferson WTP, and Manadas Creek WWTP	Total years: 8  BS, Aquatic Biology, Texas State University	Alex's expertise encompasses TPDES wastewater and industrial permitting, Texas Land Application Permits (TLAPs), and geographic information systems (GIS). She has assisted project managers in developing new, renewal, and major amendment permit applications. Additionally, she has provided substantial technical support on a wide range of regulatory issues, including stream studies, pretreatment programs, and water quality data collection.	<ul style="list-style-type: none"> <li>■ <b>City of Waxahachie, Waxahachie Wastewater Treatment Facility (WWTF)   Preparer.</b> Prepare and submit the TPDES renewal application for the WWTF.</li> <li>■ <b>City of Houston, Kingwood Central WWTF   Preparer.</b> Prepare and submit the TPDES renewal application for the WWTF.</li> <li>■ <b>City of Beaumont, Hillebrandt WWTF   Preparer.</b> Prepare and submit the TPDES renewal application for the WWTF.</li> </ul>
 <b>Kristin Arnold</b> Water Quality Modeling	Total years: 9  MS, Environ. Engineering, California State University, Fullerton  BS, Environ. Geoscience, Texas A&M University at College Station	Kristin is a scientist on Plummer's Water Quality/ Permitting Team. Her experience is in applying for and obtaining permits (municipal and industrial) and performing water quality modeling of receiving streams to determine effluent quality limits for permits. She has expertise with dissolved oxygen and nutrient modeling. She was previously employed by the TCEQ.	<ul style="list-style-type: none"> <li>■ <b>Trinity River Water Authority, Water Quality Model for Padera Lake, Mountain Creek Regional Wastewater System   Project Scientist.</b> Kristin developed a WASP model to simulate lake water quality with the increased effluent flow and incorporated field sampling data into the model.</li> <li>■ <b>North Texas Municipal Water District, Lower East Fork Regional Water Resource Reclamation Facility Conceptual Study   Project Scientist.</b> As a subconsultant, Plummer is aiding in siting a new facility. Kristin has conducted evaluations on DO modeling, nutrients, TDS, solids, and odor to aid in siting the new LEF RWRRF.</li> </ul>
 <b>Peter Reale</b> Pretreatment Support	Total years: 8  BS, Geology, Tulane University	Peter has a wealth of knowledge, having worked both sides of wastewater regulation with experience at the TCEQ and as a Project Manager at Plummer. Peter has provided substantial technical support for a wide variety of pretreatment program projects, from minor modifications to implementation of full pretreatment programs. He understands what needs to be done to maintain a successful pretreatment program. His experience includes pretreatment program assistance, wastewater permitting, air permitting, and other regulatory projects.	<ul style="list-style-type: none"> <li>■ <b>San Jacinto River Authority, Pretreatment Regulatory Assistance   Pretreatment Project Manager.</b> Plummer has assisted SJRA with various regulatory programs including the development and approval of their pretreatment program.</li> <li>■ <b>Trinity River Authority, Denton Creek Regional Wastewater System TPDES Major Amendment Application   Project Manager.</b> Prepared application to increase permitted flow from 11.5 to 16.5 MGD. Prepared permit justification and other attachments to support flow increases.</li> <li>■ <b>Trinity River Authority, Mountain Creek Regional Wastewater System Permitting   Project Manager.</b> Coordination with modeling staff to ensure appropriate permit effluent limits were included.</li> </ul>

# SECTION 3

## Schedule



## SECTION 3 - SCHEDULE

Plummer's Water Quality/Permitting staff consistently produce high-quality application documents that meet client expectations while also meeting deadlines. Please see the schedule provided below establishing Plummer's strategy for meeting the application due date for each plant. Plummer will start the application twelve months prior to each permit's expiration date to meet the TCEQ deadline for submitting a renewal application six months prior to each permit's expiration date, as specified by the City. Plummer has developed the following schedule for completing applications in a timely manner. The depth of the Plummer Team available to assist with this project means seamless application development for your permits.



### Challenges / Recommendations:

- Plummer will coordinate with the City during the holidays (Christmas, New Year), which fall within a crucial part of the Colombia Wastewater Treatment Plant (WWTP) and Jefferson Water Treatment Plant (WTP) projects.
- Dates provided in the schedule that occur after the applications are submitted to the TCEQ are estimates. Once in the hands of the TCEQ, the five applications will likely be distributed to various permit writers and technical reviewers within the organization. The timeframes for permit processing, therefore, include estimated ranges of various TCEQ permit writers' and technical reviewers' time, which are based on the Plummer team's experience with TCEQ permit renewal applications.
- TCEQ permit writers are understaffed and most are inexperienced, meaning the permitting process can be slow when the permittee is not actively engaged in the process. Plummer staff maintains positive working relationships with TCEQ staff and management to provide answers to questions and guidance as needed to keep to process moving along.

### Approach to Meeting the Schedule:

Our approach begins with the applications for the Jefferson Water Treatment Plant and the Colombia WWTP. To provide ample time for Plummer to complete an application, we begin work six months before the final application is due to the TCEQ. To meet this deadline, Plummer will begin producing the applications for the Colombia WWTP and the Jefferson WTP in November 2024. Work on the South Laredo WWTP would begin soon after in January 2025, followed by the Manadas Creek WWTP in March 2025, and Sombretillo WWTP in May 2025. This proposed schedule allows an approximate two-month span between the application start dates, which will allow Plummer and City staff **more time to concentrate on each application individually** rather than managing them all simultaneously.

The potential schedule for three of the plants is further complicated by the holiday season (November-January). Additional coordination between Plummer and the City may be needed during this period to complete applications in a timely manner.

**PERMIT RENEWALS FOR WASTEWATER PLANTS AND JEFFERSON WATER TREATMENT PLANT**

TASK	START	FINISH	2024		2025									
			NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT
Jefferson WTP Application Productionw	11/26/2024	4/16/2025												
Kick Off Meeting	11/26/2024	11/26/2024												
Plummer Provides Request for Information (RFI)	11/27/2024	12/10/2024												
Generate Application Documents	12/11/2024	3/18/2025												
Applicant Reviews Draft Application	3/19/2025	4/1/2025												
Generate Application Documents	4/2/2025	4/15/2025												
Submit Final Application to TCEQ	4/16/2025	4/16/2025												
Colombia WWTP Application Production	11/26/2024	5/19/2025												
Kick Off Meeting	11/26/2024	11/26/2024												
Plummer Provides Request for Information (RFI)	11/27/2024	12/10/2024												
Generate Application Documents	12/23/2024	4/18/2025												
Applicant Reviews Draft Application	4/21/2025	5/2/2025												
Generate Application Documents	5/5/2025	5/16/2025												
Submit Final Application to TCEQ	5/19/2025	5/19/2025												
South Laredo WWTP Application Production	1/10/2025	6/23/2025												
Kick Off Meeting	1/10/2025	1/10/2025												
Plummer Provides Request for Information (RFI)	1/13/2025	1/24/2025												
Generate Application Documents	1/27/2025	5/23/2025												
Applicant Reviews Draft Application	5/26/2025	6/6/2025												
Generate Application Documents	6/9/2025	6/20/2025												
Submit Final Application to TCEQ	6/23/2025	6/23/2025												

# PERMIT RENEWALS FOR WASTEWATER PLANTS AND JEFFERSON WATER TREATMENT PLANT

TASK	START	FINISH	2024		2025									
			NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT
Manadas Creek WWTP Application Production	3/24/2025	8/26/2025												
Kick Off Meeting	3/24/2025	3/24/2025												
Plummer Provides Request for Information (RFI)	3/25/2025	3/24/2025												
Generate Application Documents	4/8/2025	7/28/2025												
Applicant Reviews Draft Application	7/29/2025	8/11/2025												
Generate Application Documents	8/12/2025	8/25/2025												
Submit Final Application to TCEQ	8/26/2025	8/26/2025												
Sombreretillo WWTP Application Production *	5/2/2025	10/13/2025												
Kick Off Meeting	5/2/2025	5/2/2025												
Plummer Provides Request for Information (RFI)	5/5/2025	5/16/2025												
Generate Application Documents	5/19/2025	9/12/2025												
Applicant Reviews Draft Application	9/15/2025	9/26/2025												
Generate Application Documents	9/29/2025	10/10/2025												
Submit Final Application to TCEQ	10/13/2025	10/13/2025												

\* If the City decides to renew the permit.



# SECTION 4

## Personnel Effort










## SECTION 4 – PERSONNEL EFFORT

The table provided below provides a list of each task and the Plummer staff member(s) who will be working on that specific task. Please also refer to Section 1 for additional breakdown regarding the type of services provided by Plummer staff during each task.

Our staff will serve multiple purposes for this project. For example, Jenni Griesel is a licensed professional engineer who has helped the City with its TPDES permit applications since 2019. In addition to being an engineer, she is well-versed in permit applications and has a comprehensive understanding of the TCEQ permitting process; therefore, she will serve as the overall lead technical manager in addition to an application technical lead (please see the organization chart in Section 3).

As the Principal-in-Charge of the Plummer Team, Meg Pierce-Walsh brings wide-ranging experience in all aspects of TPDES permitting and is also available, where needed, to help ensure the process goes smoothly. Meg is a skilled strategist and negotiator on specific regulatory issues, such as nutrient criteria and whole effluent toxicity, should some such issue arise in one or more draft permits.

Plummer's Water Quality/Permitting Team is an integrated team of professionals. We are ready to use our skills in regulatory support to the benefit of Laredo Utilities on your five TPDES permits.

							
	Principal-in-Charge	Project Manager	QA/QC Manager	Scientist / Engineer	Draftsman	WQ Modeler	Pretreatment Review
TASK	MEG PIERCE-WALSH	TRES KOENINGS	ASHLEY LEWIS	ALEX HUGHES/JENNI GRIESEL	BRIAN DICKMAN	KRISTIN ARNOLD/NABIN BASNET	PETER REALE
1. Pre-application meeting with the City and Plummer	✓	✓		✓			
2. Assemble all necessary documents for the submittal of the application		✓	✓	✓	✓	*	*
3. Conduct site visits (if necessary)	✓	✓					
4. Provide PDF version of draft applications to City for review and comment/approval		✓	✓	✓			
5. Finalize permit applications and submit to the TCEQ		✓	✓	✓	✓	*	*
6. Follow up with the TCEQ during permit processing	✓	✓	✓	✓		*	*

\* As needed

# SECTION 5

## Management Control Program

## SECTION 5 – MANAGEMENT CONTROL PROGRAM

The Water Quality/Permitting Team at Plummer considers several hallmarks crucial for proper management control of a TPDES permitting project. It starts early with spending the time it takes to properly scope the project and ends with appropriate attention to closing out the project and considering possible improvements to the process for future projects. Between these two bookends is a “library” of additional management support. We would summarize our management control system as follows:

- Scope, schedule, and budget developed.
- Contract approved and signed.
- Internal “0-percent QC” meeting with staff assigned to the project.
- Kick-off meeting with Laredo staff to ensure everyone is on the same page regarding the scope and schedule milestones.
- Early communication with the TCEQ permitting staff regarding the project. This is usually less critical for straight permit renewals, but given that Laredo will be submitting five in close succession, we believe this to be important to the success of this project.
- Continuous internal communication among the team to ensure tasks are being accomplished as necessary and to ensure the product quality goals are met. Plummer’s Water Quality/Permitting team does this for every project, all of the time.
- Frequent communication with the City during application preparation to keep you informed of progress or issues.
- Communication, as needed, with TCEQ permitting staff during their review of the application.
- Careful evaluation of every draft permit produced by the TCEQ, discussion with you regarding any issues identified with the draft permit and prompt response to TCEQ permitting staff to address any such issues.

**To the last point, we complete the process by reviewing the issued permit to ensure there have been no inadvertent changes to the permit in its finalization by the TCEQ.**

Using this management control program, Plummer’s Water Quality/Permitting Team routinely ensures that the renewed TPDES permit is a document that you can work with throughout the ensuing permit term.



As demonstrated in our past TPDES renewal applications for Laredo, our team has extensive experience managing multiple permit applications simultaneously. We maintain a cooperative approach with daily communication and updates to ensure all project aspects are effectively managed. Using tools like internal tracking spreadsheets, the TCEQ’s application database, and consistent communication with the TCEQ and our clients, we diligently monitor our projects resulting in timely and smooth processing. This is a routine practice for us, and we will continue to apply this strategy for Laredo.

# SECTION 6

## Experience and References

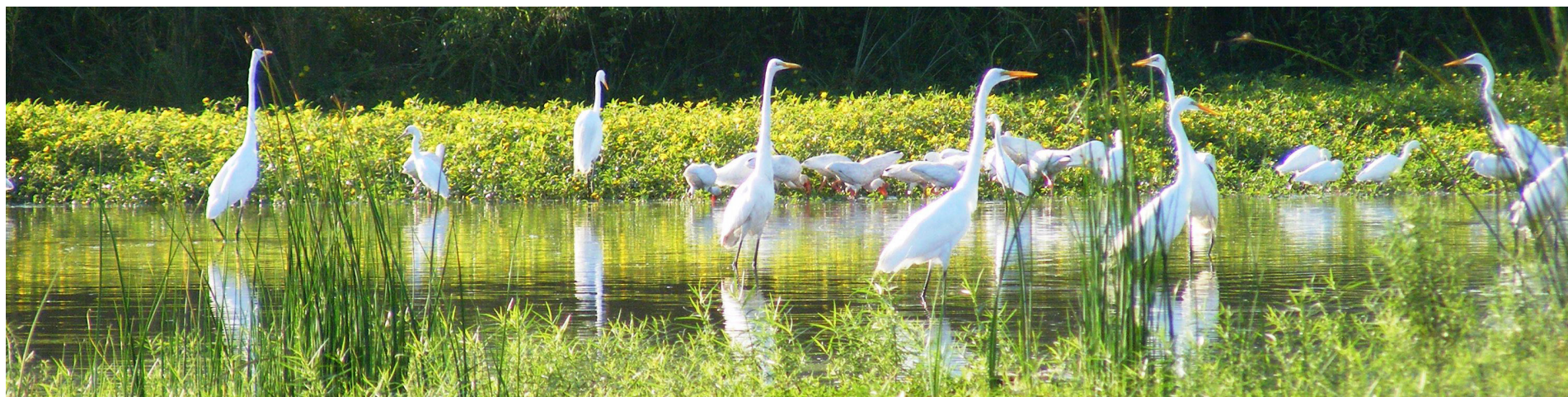


# SECTION 6 – EXPERIENCE AND REFERENCES

CLIENT/REFERENCE	PROJECT HIGHLIGHTS	PROJECT MANAGER	PROJECT SCIENTIST / PROJECT ENGINEER	WATER QUALITY MODELER	DRAFTING / GRAPHICS	QUALITY CONTROL / QUALITY ASSURANCE	PRINCIPAL
<p>Texas Water Utilities, Inc.</p> <p>Chuck Barry TWU, Inc. Phone: 512.784.7632</p> <p>1620 Grand Avenue Parkway, Suite 140 Pflugerville, Texas 78660</p>	<p><b>Permit Renewal and Regulatory Support for Multiple Wastewater and Water Facilities</b></p> <ul style="list-style-type: none"> <li>35 domestic WWTPs and WTPs</li> <li>TPDES permit applications</li> <li>O&amp;M manuals</li> <li>Facility transfers</li> <li>Other regulatory support, as necessary</li> <li>Stormwater Pollution Prevention Plan (SWP3) Assistance</li> </ul>	Tres Koenings	Jenni Griesel	Kristin Arnold	Brian Dickman	Chris Pasch / Ashley Lewis	Meg Pierce-Walsh
<p>City of Corpus Christi</p> <p>Daniel Deng, PE Assistant Director of Wastewater Treatment Phone: 361.826.1805</p> <p>1201 Leopard Street Corpus Christi, Texas</p>	<p><b>Wastewater and Water Regulatory Support for Multiple Facilities</b></p> <ul style="list-style-type: none"> <li>6 domestic WWTPs and 1 WTP</li> <li>Managed simultaneous TPDES permit applications</li> <li>Pretreatment program support (separate contract)</li> <li>Other compliance support, as necessary for all plants</li> </ul>	Tres Koenings	Alex Hughes	Kristin Arnold	Brian Dickman	Ashley Lewis	Meg Pierce-Walsh
<p>Trinity River Authority</p> <p>Jennifer Moore Phone: 817.493.5145 mooreJ@trinityra.org</p> <p>5300 S. Collins Arlington, Texas 76018</p>	<p><b>Northern Region Regulatory Contracts for Multiple Wastewater and Water Facilities</b></p> <ul style="list-style-type: none"> <li>5 regional domestic WWTPs</li> <li>2 TPDES major amendment application underway</li> <li>Water quality modeling is being performed for a planned expansion/major TPDES amendment of 1 plant</li> <li>Pretreatment program support</li> <li>WET testing review support</li> <li>Stormwater permit compliance support</li> <li>Other regulatory compliance support, as necessary</li> </ul>	Peter Reale	Ashley Lewis / Jenni Griesel	Nabin Basnet / Kristin Arnold	Brian Dickman	Chris Pasch / Ashley Lewis	Meg Pierce-Walsh

# SECTION 6 – EXPERIENCE AND REFERENCES *CONTINUED*

CLIENT/REFERENCE	PROJECT HIGHLIGHTS	PROJECT MANAGER	PROJECT SCIENTIST / PROJECT ENGINEER	WATER QUALITY MODELER	DRAFTING / GRAPHICS	QUALITY CONTROL / QUALITY ASSURANCE	PRINCIPAL
<p><b>City of Houston</b></p> <p><b>Walid Samarneh, PE</b> Managing Engineer Phone: 832.395.5771 Walid.Samarneh@houstontx.gov</p> <p>901 Bagby Street Houston, TX 77002</p>	<p><b>Regulatory Support for Multiple Wastewater Facilities</b></p> <ul style="list-style-type: none"> <li>• 36 domestic WWTPs</li> <li>• 3 TPDES major amendment applications pending</li> <li>• 2 WTP residual permits</li> <li>• Other regulatory compliance support, as necessary</li> </ul>	<b>Ashley Lewis</b>	<b>Jenni Griesel</b>	<b>Kristin Arnold</b>	<b>Brian Dickman</b>	<b>Chris Pasch / Meg Pierce-Walsh</b>	<b>Meg Pierce-Walsh</b>
<p><b>City of Round Rock</b></p> <p><b>Laton Carr, PE</b> Engineer - Principal Phone: 512.218.3238 lcarr@roundrocktexas.gov</p> <p>221 East Main Street Round Rock, TX 78664</p>	<p><b>Permit Renewals and Amendments for Multiple Wastewater Facilities</b></p> <ul style="list-style-type: none"> <li>• 2 domestic WWTPs</li> <li>• 1 TPDES renewal application pending</li> <li>• 1 TPDES minor amendment with renewal application pending</li> <li>• Major water quality modeling effort necessary for both permits</li> </ul>	<b>Ashley Lewis</b>	<b>Jenni Griesel</b>	<b>Kristin Arnold</b>	<b>Brian Dickman</b>	<b>Chris Pasch / Meg Pierce-Walsh</b>	<b>Meg Pierce-Walsh</b>



# Conflict of Interest Questionnaire

# CONFLICT OF INTEREST QUESTIONNAIRE

<b>CONFLICT OF INTEREST QUESTIONNAIRE</b> <b>For vendor or other person doing business with local governmental entity</b>		<b>FORM CIQ</b>
<p><b>This questionnaire reflects changes made to the law by H.B. 1491, 80th Leg., Regular Session.</b></p> <p>This questionnaire is being filed in accordance with Chapter 176, Local Government Code by a person who has a business relationship as defined by Section 176.001(1-a) with a local governmental entity and the person meets requirements under Section 176.006(a).</p> <p>By law this questionnaire must be filed with the records administrator of the local governmental entity not later than the 7th business day after the date the person becomes aware of facts that require the statement to be filed. See Section 176.006, Local Government Code.</p> <p>A person commits an offense if the person knowingly violates Section 176.006, Local Government Code. An offense under this section is a Class C misdemeanor.</p>	<div style="border: 1px solid black; padding: 2px; text-align: center;"><b>OFFICE USE ONLY</b></div> <div style="border: 1px solid black; padding: 2px;">Date Received</div>	
<div style="border: 1px solid black; padding: 2px;"> <b>1</b> Name of person who has a business relationship with local governmental entity.                 </div>		
<div style="border: 1px solid black; padding: 2px;"> <b>2</b> <input type="checkbox"/> Check this box if you are filing an update to a previously filed questionnaire.                       (The law requires that you file an updated completed questionnaire with the appropriate filing authority not later than the 7th business day after the date the originally filed questionnaire becomes incomplete or inaccurate.)                 </div>		
<div style="border: 1px solid black; padding: 2px;"> <b>3</b> Name of local government officer with whom filer has employment or business relationship.                     </div> <div style="text-align: center; margin: 10px 0;"> <b>N/A</b>  <hr style="width: 30%; margin: 0 auto;"/>                     Name of Officer                 </div> <p>This section (item 3 including subparts A, B, C &amp; D) must be completed for each officer with whom the filer has an employment or other business relationship as defined by Section 176.001(1-a), Local Government Code. Attach additional pages to this Form CIQ as necessary.</p> <p>A. Is the local government officer named in this section receiving or likely to receive taxable income, other than investment income, from the filer of the questionnaire?</p> <div style="display: flex; justify-content: space-around; margin: 10px 0;"> <input type="checkbox"/> Yes                 <input type="checkbox"/> No             </div> <p>B. Is the filer of the questionnaire receiving or likely to receive taxable income, other than investment income, from or at the direction of the local government officer named in this section AND the taxable income is not received from the local governmental entity?</p> <div style="display: flex; justify-content: space-around; margin: 10px 0;"> <input type="checkbox"/> Yes                 <input type="checkbox"/> No             </div> <p>C. Is the filer of this questionnaire employed by a corporation or other business entity with respect to which the local government officer serves as an officer or director, or holds an ownership of 10 percent or more?</p> <div style="display: flex; justify-content: space-around; margin: 10px 0;"> <input type="checkbox"/> Yes                 <input type="checkbox"/> No             </div> <p>D. Describe each employment or business relationship with the local government officer named in this section.</p>		
<div style="border: 1px solid black; padding: 2px;"> <b>4</b> <div style="display: flex; justify-content: space-between; align-items: flex-end; margin-top: 20px;"> <div style="text-align: center;">   <hr style="width: 100%;"/>                         Signature of person doing business with the governmental entity                     </div> <div style="text-align: center;">                         June 28, 2024  <hr style="width: 100%;"/>                         Date                     </div> </div> </div>		

Adopted 06/29/2007