

EXHIBIT 14
ADMINISTRATIVE RECORD # 122



San Jacinto River Authority

Woodlands Division

P.O. Box 7537 The Woodlands, Texas 77387

November 4, 2008

Mr. Phillip Jennings, 6WQ-PP
Effluent Toxicity Coordinator
U.S. Environmental Protection Agency (EPA)
Region 6
1445 Ross Ave.
Dallas, TX 75202

Re: San Jacinto River Authority
NPDES Permit No. TX0054186
Sublethal Toxicity Evaluation

Dear Mr. Jennings:

San Jacinto River Authority (SJRA) appreciates the opportunity to provide EPA with a summary report and supporting documents that demonstrate SJRA's efforts to identify the cause(s) of sporadic sublethal WET test failures in the Ceriodaphnia dubia test during the past three years. This information is provided for review and comment, as a follow-up to SJRA's August 20, 2008 conference call with EPA.

Enclosed is a Sublethal Toxicity Evaluation (STE) summary report of SJRA's activities associated with evaluating sublethal toxicity. A copy of sublethal toxicity characterization studies that SJRA conducted during the past three years are enclosed as attachments to the STE summary report. Also, enclosed is a compact-disc (CD) that contains routine Ceriodaphnia dubia biomonitoring reports, sublethal toxicity evaluation reports, an evaluation of Significant Industrial Users, and a copy of the recently issued (October 16, 2008) TCEQ permit for the referenced facility.

SJRA has engaged the services of an excellent team of professionals to assist with its biomonitoring and STE efforts. Information provided in the enclosed Sublethal Toxicity Evaluation summary report is a joint-effort by SJRA and its following team members:

Alan Plummer Associates, Inc.
EA Engineering, Science, and Technology, Inc.
ENVIRON International Corp.

Mr. Phillip Jennings
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We look forward to an opportunity to discuss, with EPA, the information that is provided in the summary report and attachments, as well as SJRA's conclusion concerning the cause of sublethal WET failures. Should you have any questions, please contact Mrs. Tojuana Cooper or me at (281)367-9512.

Yours truly,



Donald R. Sarich, P.E.
Division Manager – The Woodlands

Enclosures

DRS:TC

cc: Dr. Peggy Glass, Alan Plummer Associates, Inc.
Mr. Rex Hunt, Alan Plummer Associates, Inc.
Mrs. Lauren Kalisek, Lloyd Gosselink Rochelle & Townsend, P.C.
Mr. Reed Eichelberger, P.E., San Jacinto River Authority
Mr. Scott Hall, ENVIRON International Corp.
Mr. John Baummer, EA Engineering, Science, and Technology, Inc.
Mr. Jim Davenport, Texas Commission on Environmental Quality
Mr. Michael Pfeil, Texas Commission on Environmental Quality



San Jacinto River Authority
Woodlands Division

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TRANSMITTAL

Date: November 4, 2008

To: U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202

Attn: Mr. Phillip Jennings, 6WQ-PP

We are transmitting the following:

- Tracings, Prints, Specifications, Contract Documents, Information, Other

Table with 3 columns: Copies, Date, Description. Rows include cover letter, Sublethal Toxicity Evaluation (notebook), Sublethal Toxicity Evaluation (compact-disc), and Sublethal Toxicity Evaluation (attachments).

These are transmitted as checked below:

- For your approval, For review and approval, For your files, For your use, As requested, Other: For review and comment

Remarks:

Large empty rectangular box for remarks.

Copies to: D. Sarich

By: Tojuana Cooper (handwritten signature)

- Transmittal only, Transmittal with Enclosures