

Morgan Henske

Please see the attached document. Thank you.



OFFICE OF THE COUNTY ENGINEER
HARRIS COUNTY • TEXAS

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Watershed Protection Group
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Houston, Texas 77002

July 17, 2026

TCEQ OSSF Program
P.O. Box 13087, MC-235
Austin, TX 78711-3087

Via Web Form: [TCEQ Invites Stakeholder Comments on Potential Rule Changes](#)

Subject: Comments on the Proposed Revisions to Title 30, Texas Administrative Code, Chapter 285

To the TCEQ OSSF Team,

The Harris County Office of the County Engineer Watershed Protection Group appreciates the opportunity to review and comment on the proposed changes to 30 TAC 285.

We commend the Texas Commission on Environmental Quality staff for the extensive time, technical expertise, and collaborative effort invested in drafting these revisions. Your work to clarify regulatory requirements while protecting water quality across the state is highly valued.

As an Authorized Agent and stakeholder deeply invested in regional water quality, the Watershed Protection Group has compiled feedback to ensure the regulation remains effective, clear, and practical to implement. Please find our specific comments, suggestions, and requested modifications in the attached document.

Thank you for your dedication to protecting Texas water resources and for considering our input. If you require further clarification regarding our submission, please contact me directly.

Sincerely,

Morgan Henske
Water Quality Team Lead – Watershed Protection Group
Office of the County Engineer

Comments:

285.30 Site Evaluation:

Soil Analysis: Only calls for 2' in depth for disposal, but this does leave out the soil class present at the bottom of the tank. It often occurs that Installers assume they won't need sand to backfill the tank, but that's not always the case due to clay rich soils at depth (refers to 285.32b.F.) If D.R.'s are not Site Evaluators, they can receive push back when making judgements of soils at depth that have not been officially evaluated.

285.6 Cluster Systems:

Does "condominium regimes" also include multi-unit commercial complexes on a common septic system? Who would hold responsibility for OSSF functionality?

Concerns to be Potentially Addressed:

Will there be classes provided on new regulation sciences to help stakeholders better understand updated requirements and ensure compliance.

Illegal installations occurring across multiple counties would benefit from stronger state-level intervention. Centralized enforcement could allow the state to build larger cases and impose more meaningful consequences, rather than small fees that fail to deter violations for unlicensed installers. Additionally, identifying compliance pathways for individuals who do not hold licenses would help ensure safer, lawful operations.