

**Luci Dunn, PE**  
Enprotec / Hibbs & Todd, Inc.

**PROFESSIONAL EXPERIENCE**

Ms. Dunn has 33 years of experience in regulatory compliance with respect to wastewater systems. Having worked as an EPA Region VI staff member, she possesses valuable insights to help client's obtain appropriate permits from regulatory agencies. Her expertise is applied to planning municipal water and wastewater systems.

**PROJECT EXPERIENCE**

**Wastewater**

Ms. Dunn prepares municipal and industrial (municipal reverse osmosis (RO)) Texas Discharge Elimination System (TDDES) permits for wastewater discharges and Texas Land Application Permits (TLAPs) for land disposal via irrigation and evaporation. She has been the primary preparer of 45 TDDES permit applications, 11 TLAP applications, and 11 RO TDDES permit applications, and has assisted with an additional 62 TDDES permit applications and TLAP applications. Ms. Dunn prepares reclaimed water use authorizations to beneficially reuse treated wastewater effluent.

**Planning**

Ms. Dunn prepares environmental assessments (EAs) in the preliminary planning stage of projects in accordance with the National Environmental Policy Act (NEPA) and evaluates the project alternatives and their impacts to cultural resources, floodplains, wetlands, threatened and endangered species, Wild and Scenic Rivers, the Clean Air Act, Farmland Protection, noise, toxics, environmental justice, and water quality. Ms. Dunn prepares Phase I Environmental Site Assessments (ESAs) in accordance with standards for all appropriate inquiries by identifying past, existing, probable, and potential environmental concerns. She has been the environmental professional of record on over 30 Phase 1 ESAs and assisted with numerous others.

**Water**

As a project engineer, Ms. Dunn prepares disinfection protocol studies for water treatment plants in compliance with the Long-term 2 Enhanced Surface Water Treatment Rule and Stage 2 DBP Rule. Contact times are established to ensure proper disinfection is provided at the plant prior to distribution. Ms. Dunn developed the first watershed program for EPA Region 6. She provided technical oversight for the watershed project and acted as a regional liaison on watershed issues. The program's framework included integration of non-point source and point source priorities.

**Regulatory Compliance**

Ms. Dunn prepares a variety of plans, including construction and industrial stormwater pollution prevention plans, risk management plans, spill prevention control and countermeasures, WWTP unit closure plans and closure reports, and groundwater sampling and analysis.

Ms. Dunn has experience preparing sludge beneficial use WWTP sludge permit applications and WTP residuals registration applications, and municipal solid waste permit applications and associated support documents.



**EDUCATION**

Master of Science, Chemical Engineering  
Texas Tech University, 1987

Bachelor of Science, Chemical Engineering  
Texas Tech University, 1986

**REGISTRATIONS**

Registered Professional Engineer –  
Texas #73943, 1993

**PROFESSIONAL/CIVIC**

**ORGANIZATIONS**

Brazos G Regional Water Planning  
Group, Voting Member

Society of Women Engineers

Texas Society of Professional  
Engineers

**CERTIFICATIONS/EDUCATION**

AWWA Utility Risk & Resilience  
Certified, 2019

Certified Nutrient Management  
Specialist, Texas A&M AgriLife, 2013

Applied Groundwater Statistics  
Short Course, Intelligent Decision  
Technologies, Inc., 2002

Construction QA/QC for Geosynthetic  
Installations Short Course, TRI/  
Environmental, Inc., 2001

Vadose Monitoring / EPA, Oklahoma,  
1995

Ms. Dunn assists facilities in the negotiation of Agreed Orders, and Notice of Violations for water, wastewater, solid waste and hazardous waste enforcement issues, as well as negotiation of supplemental environmental projects in lieu of penalty payments. Typically, this work includes preparing all required documentation to maintain compliance with Agreed Orders and Notices of Violation

### Management

Ms. Dunn develops Management Plans for organizations. She served as the first Watershed Coordinator for EPA-Region 6 and developed the Regional Management Plan prototype for the Program. She gathered data from personnel in various government agencies/departments in order to develop program mission statements, prepared organization charts, established lines of responsibility and defined roles with a Management Plan structure.

### Notable Projects

- TPDES Permit Applications: Acton Municipal Utility District Wastewater Treatment Plant (WWTP) #1 and #2, City of Albany WWTP, City of Big Lake WWTP, City of Breckenridge WWTP, City of Bridgeport WWTP, City of Brownwood WWTP, City of Cisco Water Treatment Plant (WTP) and WWTP, Crockett Heights WWTP, City of Eastland WWTP, Eastland County Water Supply District (WSD), City of Glen Rose WWTP, City of Granbury South WWTP, City of Huntsville AJ Brown/Parker Creek WWTP, City of Jacksboro WWTP, City of Mason WWTP, City of Robert Lee WWTP, City of Roma WTP and WWTP, City of Stamford WTP and WWTP, Texas Parks and Wildlife Lake Arrowhead State Park WWTP and Dinosaur Valley State Park WWTP, Upper Leon River Municipal Water District (MUD) Proctor WTP and Fritts WWTP, and White River WTP.
- TLAP Applications: City of Ballinger WWTP, City of Brady WTP, Circle Bar Truck Corral WWTP, City of Paducah WWTP, City of Rankin WWTP, City of Roby WWTP, City of Roscoe WWTP, City of Santa Anna WWTP, Sheffield Water Supply Corporation WWTP, City of Spur WWTP, City of Sterling City WWTP, and City of Winters WWTP.
- Industrial RO TPDES Permit Applications: City of Abilene Raw Water Roughing Facility, Brazos Regional Public Utility Agency (PUA) Surface Water Treatment System (SWATS), Granbury WTP, Parker County Special Utility District (SUD), Possum Kingdom WSC, and Stephens Regional SUD.
- EAs: City of Abilene Hamby Water Reclamation Facility and Effluent Pipeline, City of Abilene Possum Kingdom Drought Response Improvements, City of Brady Radium Reduction Project, City of Cisco Emergency WTP Replacement, City of Cisco New WWTP, City of Coahoma 2020 WWTP Improvements, City of Eastland 2017 WWTP Improvements and 2018 WTP Improvements, Eastland County WSD 2019 Water System Improvements, City of Granbury 2017 Water System Improvements, City of Granbury Phase II WTP Expansion, City of Granbury Rucker Street Bridge Utility Support, Hawley WSC 2017-2018 Water System Improvements, Johnson County SUD 2018 Water System Improvements, City of Mason Radionuclide Reduction Project, City of Midland Northeast Water System Improvements, Parker County SUD Phase 1 Water System Improvements, Rolling Hills Water Service 2016 Water System Improvements, City of Roma 2020 Paving Improvements, City of Roma Landfill Expansion, City of Roscoe 2020 Water Distribution System Improvements, City of San Angelo Hickory Groundwater Supply Buildout, City of Stamford 2016 Water System Improvements, City of Sweetwater 2013 Emergency Water Supply Improvements, City of Sweetwater 2016 Water System Improvements

### CERTIFICATIONS/EDUCATION (CONT.)

Basic RCRA Inspector Training Course / EPA, Dallas, Texas, 1994

Applied Fluvial Geomorphology, Wildlance Hydrology Consultants / EPA, Dallas, Texas, 1994

Air Surveillance for Hazardous Materials / EPA, Phoenix, Arizona, 1991

Statistics, Data Analysis and Designed Experiments, 3M, Brownwood, Texas, 1990

### PUBLICATIONS/PRESENTATIONS

Brine Disposal, Texas Water Conservation Association Conference, 2015

Disinfection ByProduct, Texas Water Utilities Seminar, 2004

### PROFESSIONAL ENDEAVORS

Enprotec / Hibbs & Todd, Inc.  
Senior Project Manager  
Abilene, Texas  
1998 - present

Regulatory Compliance Services  
Chemical Engineer  
Rockwall, Texas  
1997 - 1998

Environmental Protection Agency  
Hazardous Waste Enforcement Officer  
Dallas, Texas  
1994 - 1995

Environmental Protection Agency  
Regional Watershed Coordinator  
Dallas, Texas  
1993 - 1994

Dyess AFB, Engineering Branch  
Chemical Engineer  
Dyess AFB, Texas  
1991 - 1993

3M Traffic Control, Materials Division  
Advanced Process Engineer  
Brownwood, Texas  
1987 - 1991

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- Risk Management Plans: Brazos Regional PUA, , City of Abilene, City of Albany, City of Ballinger, City of Brownwood, City of Cisco, City of Midlothian, City of Midland, City of Stamford, City of Sweetwater, Upper Leon River MWD, White River MWD, City of Winters
- Air Permit-by-Rule Documentation: City of Abilene, City of Brownwood, City of Roma, , Stephens Regional PUA, and various industries
- Compliance assistance with Notice of Violations, Agreed Orders and Supplemental Environmental projects for wastewater, water, air and solid waste issues: Various municipal clients over the past 20 years
- Disinfection protocols for water treatment plants
- Industrial stormwater pollution prevention plans for wastewater treatment plants with flow of >1 MGD, landfills, airports, and other industrial facilities
- Spill prevention, control and countermeasure plans for municipal airports, landfills and industrial facilities
- Watershed Coordinator, EPA Region 6