

From: [Vickerson, Casey](#)
To: [Richardson, Stefanie](#)
Subject: FW: 4811-WR-3 & -4
Date: Wednesday, November 19, 2014 1:02:26 PM

4811-WR-3 and 4811-WR-4, thanks!!

From: Vickerson, Casey
Sent: Wednesday, November 19, 2014 1:01 PM
To: 'Kathy Bartlett'
Subject: RE: 4811-WR-3 & -4

I know Tim Clevenger deals with financial mechanisms in Legal. Clevenger@adeq.state.ar.us or 501 682 0811. You will need to submit documentation proving you are an improvement district and request an exemption I assume through him. I am not really sure of their process, but he should be able to give you more information about how to proceed. Hope he can help! Please let me know if you have issues and keep me updated on the status so I know not to ask for financial assurance later. Thanks!

From: Kathy Bartlett [<mailto:kathy@aquatechsys.com>]
Sent: Wednesday, November 19, 2014 12:37 PM
To: Vickerson, Casey
Subject: RE: 4811-WR-3 & -4

Ok, so what do I need to do next to get the Legal Division involved for verification of the improvement district and exemption on the FA?

From: Vickerson, Casey [<mailto:Vickerson@adeq.state.ar.us>]
Sent: Wednesday, November 19, 2014 11:03 AM
To: Kathy Bartlett
Subject: RE: 4811-WR-3 & -4

Colby said it has to be verified through our Legal Division that you are a sewer improvement district and you must request through them to be exempt from obtaining financial assurance.

From: Vickerson, Casey
Sent: Wednesday, November 19, 2014 10:44 AM
To: 'Kathy Bartlett'
Subject: RE: 4811-WR-3 & -4

Kathy, now I am seeing your active permit states "if the permit is modified or renewed, the facility at that time must obtain financial assurance." Colby did that permit. I can see if he remembers why...

From: Kathy Bartlett [<mailto:kathy@aquatechsys.com>]
Sent: Wednesday, November 19, 2014 10:34 AM
To: Vickerson, Casey
Subject: RE: 4811-WR-3 & -4

So just to confirm, if I keep the permit in the name of Greenfield the FA is waived, is that correct?

From: Vickerson, Casey [<mailto:Vickerson@adeq.state.ar.us>]
Sent: Wednesday, November 19, 2014 10:28 AM
To: Kathy Bartlett
Subject: RE: 4811-WR-3 & -4

Yes, sewer improvement districts' FA is waived.

From: Kathy Bartlett [<mailto:kathy@aquatechsys.com>]
Sent: Wednesday, November 19, 2014 10:25 AM
To: Vickerson, Casey
Subject: RE: 4811-WR-3 & -4

I just want to know that the FA requirement would be the same as it was when Greenfield was issued the permit, in that the FA was waived because of the facility being a sewer improvement district. I will wait your confirmation before proceeding to withdraw the transfer request and proceed with renewal of the permit under the Greenfield entity name

Thanks
Kathy Bartlett

From: Vickerson, Casey [<mailto:Vickerson@adeq.state.ar.us>]
Sent: Wednesday, November 19, 2014 9:26 AM
To: Kathy Bartlett (kathy@aquatechsys.com)
Subject: FW: 4811-WR-3 & -4

Kathy,

Please see below per my supervisor...

If all of the paperwork can be submitted in Greenfield's name for the renewal (4811-WR-4), you can request to withdraw the permit transfer (4811-WR-3).

Thanks,

Casey

From: Yarberr, Katherine
Sent: Wednesday, November 19, 2014 9:24 AM
To: Vickerson, Casey
Subject: RE: 4811-WR-3 & -4

I'm not a lawyer, so I don't know if it could work the way the paperwork is, but I do know that it would be fine if the deed was in Greenfield's name.

She can wait until we get a determination from Legal or she can change the deed.

Thanks,

Katherine Yarberr, PE
501-682-0647

From: Vickerson, Casey
Sent: Wednesday, November 19, 2014 9:22 AM
To: Yarberry, Katherine
Subject: RE: 4811-WR-3 & -4

She said that Greenfield/Dixie is the same company, they were just changing their name, but she can get the deed in Greenfield.

From: Yarberry, Katherine
Sent: Wednesday, November 19, 2014 9:21 AM
To: Vickerson, Casey
Subject: RE: 4811-WR-3 & -4

But Dixieland owns the system, as far as I can tell from the deed (page 14 of pdf:
http://www.adeg.state.ar.us/ftproot/Pub/WebDatabases/PermitsOnline/NPDES/PermitInformation/4811-WR-4_Application%20Packet%20and%20Permit%20Transfer%20Form_20140723.pdf)

The permit has to be issued to the owner of the system. If that's Dixieland, they need the permit...

Katherine Yarberry, PE
501-682-0647

From: Vickerson, Casey
Sent: Wednesday, November 19, 2014 8:32 AM
To: Yarberry, Katherine
Subject: 4811-WR-3 & -4

Hey,

Kathy Bartlett called me asking if they withdrew their request to transfer from Greenfield Capital to Dixieland if they'd still need financial assurance. Greenfield is a Sewer Improvement District so FA was waived in the past. She said if it'd be smoother, she won't transfer and can resubmit paperwork under Greenfield. I don't see why that's not okay...

For reference, the most recent letter we sent her:

http://www.adeg.state.ar.us/ftproot/Pub/WebDatabases/PermitsOnline/NPDES/PermitInformation/4811-WR-3_Request%20for%20Financial%20Mechanism%202nd%20Notice_20141112.pdf

Thanks,

Casey Vickerson
Permit Engineer
ADEQ Water Division
501-682-0653