

## Koon, Nancy

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**From:** Meredith Hawkins <merhawkins22@gmail.com>  
**Sent:** Saturday, May 21, 2022 12:05 AM  
**To:** Water Draft Permit Comment  
**Subject:** Deny Paradise Valley draft permit No. AR0053210

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I spoke at the May 18 public hearing. Here is a copy of my comment.

I am Meredith Hawkins, Secretary of the Pinnacle Mountain Community Coalition, and a resident of Roland. The purpose of my comment today is to tie several issues together to demonstrate the THREE STAGE threat this package wastewater treatment plant poses to our community. The overarching issues here are the fact the receiving stream is low or no flow, the proposed discharge will likely not meet its permit limits, and does not control for endocrine disrupting pollutants, and the proposed discharge is upstream of a drinking water well. Comments on many of these issues exist in the record already, but we hope by discussing them in this manner, the agency will consider all these matters together and deny this permit because 1-the discharge will pollute Mill Bayou, 2-those pollutants will transfer to groundwater, and 3-our community drinking water comes from a well downstream of the proposed discharge. I am submitting with my comments today information from an engineer, a professional geologist, a medical doctor, and an attorney to demonstrate why the agency must deny this permit to protect the environment, human health, and drinking water. I will quickly summarize that information as it pertains to each of the three stages of this threat, but I am also submitting the entirety of those comments in written format today:

FIRST, the discharge to a low or now flow stream will set the stage for groundwater contamination:

- Professional engineer Rick Barger’s letter highlights several issues with the permit terms, including NH3N which are too high to protect nearby wells and groundwater. Mr. Barger also points out the cost of treatment is not properly calculated, and the coliform levels will pose a threat to downstream usage.
- Our attorney previously commented, and we reiterate today, that meeting Water Quality Based Effluent Limits in a low or now flow stream is impossible—the discharged pollutants will simply stay put during certain times of year, causing higher and higher concentrations.
- This treatment plant contains no parameters for endocrine disruptors such as pharmaceuticals and their byproducts, hormones, and heavy metals. These pollutants will end up in Mill Bayou, as the treatment plant does not treat for them.
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SECOND, the pollutants from the treatment plant will transfer to groundwater:

- Dr. Laura Ruhl, a professional geologist, provides a letter today stating how, as she terms it, pharmaceuticals and personal care products, or PPCPs, can accumulate in the environment due to their persistent nature.
- Such PPCPs pose a threat to aquatic life due to their toxic nature.
- Dr. Ruhl also agrees with Mr. Barger—NH3N is a serious issue here due to the low or no flow nature of Mill Bayou. NH3N is toxic to aquatic organisms.

THIRD, pollutants from effluent pose a threat in drinking water:

- Dr. Ruhl points out that the pollution in this effluent, and I quote, “could make its way to the groundwater. Then it would flow along the hydraulic gradient towards the river and/or the pumping Maumelle Water Corp. Wells.”
- A letter from Dr. Stack makes it clear that known contaminants in effluent, such as drugs, pharmaceuticals, and bacteria are endocrine disruptors which cause serious harm to humans.
- Dr. Stack is a Fellow with the American College of Endocrinology. His comments are serious—endocrine disruptors cause chronic damage to humans. He is an expert. We need to trust him—creating this pathway for pollution to our drinking water is a bad idea.

Conclusion:

In summary, low or no flow Mill Bayou is not a proper receiving stream for this discharge. Other states take a much more in depth and analytical approach to discharges to low or no flow streams, such as the example policy provided today from Pennsylvania. We, in Arkansas, don't appear to be doing any of those additional steps to protect water quality in low or now flow streams. This problem is amplified by the fact this stream is connected to our drinking water. Again, we ask ADEQ to deny this permit to protect the environment, human health, and our drinking water.

Thank you,

Meredith Hawkins

29818 Hwy. 300

Roland, AR 72135

**Koon, Nancy**

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**From:** Phillip Jett <phillipjett@icloud.com>  
**Sent:** Saturday, May 21, 2022 1:15 AM  
**To:** Water Draft Permit Comment  
**Subject:** Re: APPROVE Permit Number AR0053210| AFIN:60-05101

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

My name is \_\_\_\_\_Riley Jett\_\_\_\_\_ and my address is \_\_\_\_\_26 St. Andrews\_\_\_\_\_.<BR><BR>I respectfully request that ADEQ approve permit AR0053210 regarding the Paradise Valley Subdivision. <BR><BR>Private property rights are important to me as a resident of this community, state and country and the right of ownership should allow a landowner to do as they see fit with their own property. <BR><BR>Because all of the conditions handed to the developer have been met by all other governing authorities in this matter, the development should be able to move forward and homes constructed that are necessary to the market, particularly as it relates to moderate-income families at a time when nearly no inventory is readily available to them. <BR><BR>Thank you for your time and consideration. <BR>

Sent from my iPhone

## Koon, Nancy

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**From:** Kevin Huchingson <Kevin.Huchingson@colliers.com>  
**Sent:** Saturday, May 21, 2022 9:13 AM  
**To:** Water Draft Permit Comment  
**Subject:** Re: APPROVE Permit Number AR0053210| AFIN:60-05101

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

My name is Kevin Huchingson and we live at 18 Valley Crest Court in Little Rock. We have lived at this address for almost 18 years, another subdivision developed by Rick Ferguson. I've been in the real estate business for almost 30 years in central Arkansas, and have known Mr. Ferguson for most of this time. He is one of the most responsible and creative developers in the state.

I respectfully request that ADEQ approve permit AR0053210 regarding the Paradise Valley Subdivision.

Private property rights are important to me as a resident of this community, state and country and the right of ownership should allow a landowner to do as they see fit with their own property.

Because all of the conditions handed to the developer have been met by all other governing authorities in this matter, the development should be able to move forward and homes constructed that are necessary to the market, particularly as it relates to moderate-income families at a time when nearly no inventory is readily available to them.

Thank you for your time and consideration.

Kevin Huchingson, CCIM, SIOR, CRE  
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## Koon, Nancy

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**From:** Joe Mclemore <joetmclmore@aol.com>  
**Sent:** Saturday, May 21, 2022 9:58 PM  
**To:** Water Draft Permit Comment  
**Subject:** Re: APPROVE Permit Number AR0053210| AFIN:60-05101

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

My name is \_\_\_joe Mclemore \_\_\_\_\_ and my address is 352 Geelan Marion Ar. 72364  
\_\_\_\_\_.

I respectfully request that ADEQ approve permit AR0053210 regarding the Paradise Valley Subdivision.

Private property rights are important to me as a resident of this community, state and country and the right of ownership should allow a landowner to do as they see fit with their own property.

Because all of the conditions handed to the developer have been met by all other governing authorities in this matter, the development should be able to move forward and homes constructed that are necessary to the market, particularly as it relates to moderate-income families at a time when nearly no inventory is readily available to them.

Thank you for your time and consideration.

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