

Nancy Koon (adpce.ad)

From: Jerry Phillips <jerp@mindspring.com>
Sent: Friday, November 18, 2022 2:03 PM
To: Water Draft Permit Comment
Subject: Deny Paradise Valley draft permit No. AR0053210

Dear Ms. Loretta Carstens P.E.,

I request that ADEQ deny the permit being considered for the Paradise Valley sewage facility and I request a public hearing. The revised draft permit would allow pollution of a pristine wetlands area, Mill Bayou and its tributaries. The sewage facility would endanger drinking water, livestock, wildlife and the environment.

Maumelle Water Corporation (MWC) has asked repeatedly for a study to determine the sewage facility's impact on the aquifer that supplies their wells. That crucial study has not been performed and is not addressed in the revised draft permit. It appears that MWC's request is being ignored. In the previous comment period, outside experts provided data and analysis on the damage the sewage facility would inflict on the Mill Bayou Watershed. ADEQ is sending a clear message to the Roland community that protecting drinking water and the environment in the Mill Bayou Watershed is not important.

Mill Bayou is a basin, more similar to a shallow lake than a flowing stream. The water quality in Mill Bayou is pristine as documented in recent testing; this water quality must be protected and maintained. ADEQ describes Mill Bayou's water as "fishable, swimmable, drinkable" and this will no longer be the case if ADEQ allows the sewage facility to be installed. The sewer water generated by the treatment facility will simply accumulate in Mill Bayou's basin during low flow and dry periods. A long or severe dry period (as recently experienced, with photographic evidence provided to ADEQ) will mean that undiluted sewer water will soak into the ground and potentially migrate into the aquifer beneath Mill Bayou. Hazardous algae blooms will form. Then when significant rains bring flooding, the accumulated sewer water will be spread to surrounding properties and ponds. This infringes on the property rights of others. Mill Bayou is a place of extremes: extreme drying, extreme stagnation, extreme flooding. A sewage facility should never be allowed in Mill Bayou!

The sewage facility would require daily action by a licensed operator, including manually raking solid waste from the input screen, bagging the waste and hauling it away for proper disposal. What if this is not done for a day, or a week or several weeks? What if the sewage facility breaks down? Who would be responsible for the clean-up? The revised draft permit does not even require a 3-day retention tank to collect waste while repairs are made! This sewage facility would be an environmental disaster waiting to happen.

Arkansas environmental regulations and training materials define a "bad actor" as a person with a history of noncompliance with federal and state environmental regulations. The Paradise Valley developer has a history of noncompliance with environmental regulations.

For these reasons and more, ADEQ must deny this permit. Please hold a public hearing.

Thank you,

Jerry Phillips
319 Walnut Street
Little Rock, AR 72205