

## Nancy Koon (adpce.ad)

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**From:** Steve Quaid <SteveQuaid@outlook.com>  
**Sent:** Thursday, December 8, 2022 10:49 AM  
**To:** Water Draft Permit Comment  
**Subject:** Discharge Permit Number AR0053210, AFIN 60-05010

Dear Ms. Carstens , I request that ADEQ deny the permit being considered for the Paradise Valley sewage facility and I request a public hearing. I have many concerns about the placement of this facility. According to the application it will be placed on a 5 acre tract owned by a separate entity. Most of this parcel (according to PAgis) is wet lands. I don't believe Arkansas deals with wetlands so do you just treat it as surface water? If so why would this be an appropriate location. If the intent is to use the adjacent property (30 acres) owned by CAPITAL CITY PROPERTIES HOLDINGS LLC then it holds a greater risk of actually being in a flood plain according to the FEMA map 05045C0400H 12/19/2006. This is also a questionable location.

I understand that you are the authority having jurisdiction and I sympathize with the decisions you are faced with.

If this were an individual property owner I believe that the system to the home would need to be on the same parcel so that if the home was sold the septic system would not end up on a different property. Would this need to be the same for a subdivisions sewage system? Would the CAPITAL CITY PROPERTIES HOLDINGS properties need to be replatted to show that they are part of PARADISE VALLEY?

In addition I would like to include all of the other concerns.

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 their put 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, PLESAE deny the request

Sincerely,

Steve Quaid

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Sent from [Mail](#) for Windows