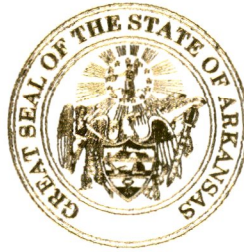


MARK JOHNSON  
SENATOR  
15<sup>TH</sup> DISTRICT  
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JOINT BUDGET  
LEGISLATIVE COUNCIL

**THE SENATE  
STATE OF ARKANSAS**

December 7, 2022

Ms. Becky Keogh  
Secretary  
Department of Energy and Environment  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

**RE: Discharge Permit Number AR0053210, AFIN 60-05010  
Paradise Valley Wastewater Treatment on Roland Cutoff – Roland, Arkansas**

Dear Secretary Keogh:

As the State Senator that represents western Pulaski County, I am writing regarding the above-described proposed permit. I have been following the development of this permit for some time and it has come to my attention that the proposed wastewater treatment plant will discharge wastewater into a wetland area that is naturally flooded at a level of six to twelve inches for over half of most years. The wastewater discharge will go into a no-flow or low-flow stream that maintains that status at all times with the exception of the times following a rainfall event.

The flooded wetland is used for hunting, fishing, and recreation as well as for some commercial and agricultural related activities. Due to the unique nature of the wetlands and their continuous use by property owners, their family members (adults and youth), and friends, the accumulation of wastewater in this area appears to present a health hazard to the community. Placing undiluted wastewater in an area where it is not likely to be diluted significantly and where it is likely to come into contact with people on their own property seems like a bad idea similar to the Bethel Heights wastewater treatment system problem in northwest Arkansas. It also appears to raise questions regarding the taking of private property and interfering with private landowners' right to the quiet use and enjoyment of their property.

If this wastewater treatment plant is to be permitted, it should not be permitted as it is currently proposed in the draft permit. The extremely critical nature of the ecology, the threat to human health, and the lack of any significant mixing/dilution should be sufficient to require that the discharge standards be raised to a level that will support human contact at the point of discharge. In other words, this wastewater should be almost drinkable due to the threat it poses to human health.

Technology is available and used by almost every manufacturer to monitor all critical points on manufacturing equipment. Similar monitoring requirements should be included in this permit so that when there is a failure, wastewater can be diverted into tanks to be held until the failure can be corrected. The wastewater treatment operator could be notified and a record could be created for the Department.

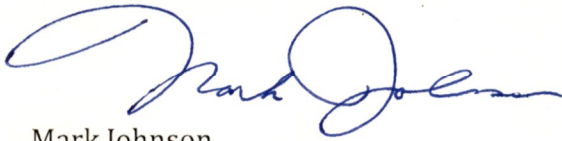
Secretary Becky Keogh  
December 7, 2022  
Page Two

This wastewater treatment plant should be held to a standard that is protective of both the environment and human health. The current draft permit does not do that.

I urge you to deny this discharge permit.

With kindest personal regards, I am

Sincerely yours,



Mark Johnson  
State Senator - District 15



MARK JOHNSON  
SENATOR  
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Ms. Becky Keogh

Secretary

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