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APR 05 2022

TO 11:37am



John Killingsworth <john.killingsworth11@gmail.com>

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## Discharge Permit Number AR0053210, AFIN 60-05010 Paradise Valley sewage treatment facility on Roland Cutoff Road, Roland, AR

1 message

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**John Killingsworth** <john.killingsworth11@gmail.com>  
To: Water-Draft-Permit-Comment@adeq.state.ar.us  
Cc: PMCC Arkansas Email <pmccarkansas@gmail.com>  
Bcc: Cheryl <motherofme53@gmail.com>

Sun, Apr 3, 2022 at 7:34 PM

Dear Mr. Khan,

Please DENY the Paradise Valley sewage treatment facility permit and hold a public hearing on the issue. Please provide at least a two-week notice prior to the public hearing to allow the community time to prepare for the hearing.

Approving this permit would create significant health and safety impacts for people and animals in the Roland area. Although there are many reasons this permit should be denied, the most egregious are described in brief below.

### **Package sewage treatment facilities are notorious for exceeding their permit limits.**

Any error or inattention to the package unit by the operator will likely result in pollution that exceeds the permit levels. This may not be detected or reported. Operator error, inattention and lack of proper maintenance have been identified as prime reasons for package units exceeding their permit limits. In some instances this has resulted in the dumping of raw sewage. Significant package unit problems have occurred across Arkansas and have been reported in Texas, Oklahoma and Louisiana. Package units are totally banned in the Lake Maumelle watershed. The Mill Bayou watershed is much more densely populated than the Lake Maumelle watershed. The Mill Bayou watershed needs the same level of protection as the Lake Maumelle watershed.

### **The unnamed creek that the facility will dump into has little to no flow in dry months.**

The area surrounding the unnamed creek is quite flat and in the dry months each year flow is minimal or non-existent. Mill Bayou itself has minimal or no flow in dry months. Package units of this type are designed to discharge into a stream with continual flow that is adequate to transport and disperse the sewage water. This unnamed creek is totally inappropriate for any sewage package unit.

### **Lack of flow will likely result in concentrated sewage water contaminating our aquifer.**

The aquifer that lies below Mill Bayou is locally recharged; surface water soaks into the ground and migrates into the aquifer. The aquifer is the source for individual wells and is the source for Maumelle Water Corporation (MWC) wells. MWC serves over 1,000 customers in a wide area around Roland. During dry months, the package unit sewer water discharge will collect in pools and will not flow away. The sewer water will evaporate and the pollutants will become more concentrated. The concentrated sewer water will migrate down into the aquifer. This puts the aquifer at significant risk of contamination, which would endanger the health and safety of everyone who depends on the aquifer

for drinking water. MWC is concerned that the package unit will contaminate the aquifer. In September, 2021, MWC requested that the ADEQ perform a study to assure that the package unit discharge will not contaminate the aquifer. This study must be completed prior to any ADEQ decision on the permit.

**Algae blooms will likely occur.**

Testing performed by Dr. Laura Ruhl, UALR Earth Science Department, indicates that existing phosphorus levels in Mill Bayou are near the level that could cause significant algae bloom. Any additional phosphorus discharged by the package unit will likely cause algae bloom formation.

**This is the first of several package units planned by the developer at this same location.**

The 50,000 gallon per day capacity of the package unit may be sufficient for the developer's Paradise Valley Phase 1 plan, but subsequent phases will necessitate additional units, discharging as much as 200,000 gallons per day. Applications for expanded capacity are typically given much less scrutiny than the initial permit application. Therefore, this application should be considered by ADEQ as ultimately generating 200,000 gallons per day, and the environmental impact of that higher output should be used in the decision to reject this initial permit.

**The problems above are worsened by significant storm water runoff from Waterview Estates and Paradise Valley.**

The dry months of the year are discussed above. But there are significant problems in the wet months as well due to the irresponsible actions of the developer regarding storm water runoff from Waterview Estates and the Paradise Valley site. In recent years, the developer has diverted approximately 100 acres of Waterview Estates storm water from the Lake Maumelle watershed to the Mill Bayou watershed, with much of this storm water flowing through the Paradise Valley site. The Waterview storm water created unprecedented flooding of homes and properties downstream of the Waterview diversion in recent years. The clearing of the Paradise Valley site by the developer was premature (approval to begin construction was granted based on incomplete and misleading information provided to state and federal agencies and Pulaski County). Paradise Valley storm water is causing a very bad flooding situation to be much worse. Storm water is also a significant source of phosphorus, making the algae bloom problem worse. Pooled, concentrated sewage water that collects during dry months will be lifted and transported to people's back yards, properties and ponds when flooding occurs. This pollution will impact many property owners.

**The developer is a bad actor.**

The developer has entered into a Consent Administrative Order with ADEQ regarding the Waterview Estates package unit and has had multiple permit violations. The developer provided incomplete and misleading information during the initial Paradise Valley application phase. For example, the developer obtained Arkansas Health Department re-approval of an old Saddle Ranch application that did not even include a sewage treatment plant, and then informed ADEQ that AHD had approved the Paradise Valley plan! This sleight-of-hand by the developer was fortunately discovered by AHD / ADEQ and resulted (at least in part) in the re-opening of the Public Comment Period (for which the community is very grateful). The developer attempted to claim that the Paradise Valley site was not a wetlands area based on maps from the wrong agency and contacted the US Corps of Engineers about Paradise Valley only after being prompted to do so by ADEQ. The developer is causing real-time flooding damage by flagrantly dumping storm water from Waterview Estates and Paradise Valley on innocent, unsuspecting

property owners. These facts, coupled with the fact that the developer wants to dump up to 200,000 gallons per day of sewage water into a creek bed that doesn't flow in dry months and that is connected to a vital aquifer demonstrates that the developer is irresponsible and a danger to the community – a bad actor.

I urgently request that the Paradise Valley sewage treatment facility permit be rejected.

Sincerely,

John Killingsworth

25100 Roland Cutoff Road

Roland, AR 72135

A handwritten signature in black ink that reads "John A Killingsworth". The signature is written in a cursive style with a long, sweeping underline that extends to the right.



John Killingsworth <john.killingsworth11@gmail.com>

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## Fwd: FW: Paradise Valley Sewage Treatment

1 message

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**Chris Centofante** <pmccarkansas@gmail.com>  
To: John Killingsworth <john.killingsworth11@gmail.com>

Tue, Apr 5, 2022 at 10:33 AM

----- Forwarded message -----

**From:** Doug Reed <doug-reed@att.net>  
**Date:** Mon, Apr 4, 2022 at 5:10 PM  
**Subject:** FW: Paradise Valley Sewage Treatment  
**To:** <pmccarkansas@gmail.com>

Would you all please forward this to Mr. Khan for me. I have tried over and over and it is always blocked.

Thanks YOu

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**From:** Doug Reed <doug-reed@att.net>  
**Sent:** Friday, March 18, 2022 1:55 PM  
**To:** 'Water-Draft-Permit-Comment@adeq.state.ar.us' <Water-Draft-Permit-Comment@adeq.state.ar.us>  
**Cc:** 'pmccarkansas@gmail.com' <pmccarkansas@gmail.com>; 'dorisareed1@outlook.com' <dorisareed1@outlook.com>  
**Subject:** Paradise Valley Sewage Treatment

Dear Mr. Khan,

Hi, my name is Doug Reed and I represent the people of this area on the Quorum Court as a Justice of the Peace. I ask that ADEQ deny the permit for the sewage treatment facility for Paradise Valley and I also request a public hearing on this issue if/when that time comes. Mill Bayou is not an appropriate use as a sewage facility's pipe - in this location especially. Some of the reasons for opposing this are listed below

1. Mill Bayou is often stagnant with very little flow. Pools of water remain in low areas, which can promote growth of algae blooms and cause the water to become toxic. The addition of a sewage treatment facility could potentially add to this problem and cause irreversible environmental harm in several other ways. The continuous rise and fall of waterways can create more pools of water with lethal levels of nitrogen and phosphorus. This lethal combination depletes the oxygen level of the water killing fish, other aquatic animals, and plant life. When these pools of water are dispersed due to flooding, the pollutants are spread to other areas causing a potential increase in contaminated areas. The process of a sewage treatment facility would also contribute additional chemicals such as chlorine and release suspended fecal solids to the waterway multiplying the health risk
2. This, as you know, would be the second sewage treatment facility on Mill Bayou(Waterview Estates being this same developer's other sewage facility)which would more than double the amount of treated sewage and chemicals going into Mill Bayou and into the Arkansas River. Consider this "Bad Actor's" history and how he has been operating the Waterview Estates sewage treatment facility. He has been consistently cited

for noncompliance violations with the ADEQ. This same "Bad Actor" is now proposing to build another sewage treatment facility that will empty into Mill Bayou, on Roland Cutoff Road.

3. A rural community like ours should continue to be individual homes with independent septic systems to help protect the residents living here, the culture and the environment. We welcome new neighbors to join us in our beautiful community. In the best interest of everyone living in this community, those moving to this area and those who come to enjoy the abundant recreational activities, please safeguard the existing environment and rural culture. Keep this rural countryside in a natural state for us and future generations. Please do not knowingly add unnecessary chemicals and bacteria to poison our waterways and destroy our way of life.

Save Mill Bayou-DENY this permit!

Have a public hearing on the issue!

Sincerely,

Doug Reed, Justice of the Peace, District One  
11610 Barrett Rd.  
Roland, AR 72135  
501-951-5489