

Koon, Nancy

From: Kristy Eanes <kristyeanes@yahoo.com>
Sent: Friday, March 18, 2022 1:07 PM
To: Water Draft Permit Comment
Subject: RE: Discharge Permit Number AR0053210, AFIN 60-05010

Dear Faizan,

I respectfully ask that the ADEQ deny the Paradise Valley NPDES permit referenced above (AR0053210). I also request that the ADEQ hold a public hearing and if possible no earlier than April 14 to allow the community a proper grace period to both learn from the commenting period and prepare for a hearing.

As a local resident living in Little Italy, founded in 1915 by my great-grandfather Joseph Belotti, I have deep roots and a love for my community with serious concerns for the health and well-being of my neighbors and especially the community of Roland who will bear the full brunt of the Waste Water Treatment Plant's (WWTP) ill-effects. My reasons to deny this permit include the following:

1. The Pulaski County Planning Board never received the full scope of work from the developer for Paradise Valley. As a Commissioner on the Pulaski County Planning Board, I can attest to the incomplete filing. I reason the very integral-to-the-development site across the road should have been presented as a variance. Indeed, the subdivision could not exist without it as it has the location of the WWTP. If so, the property owners abutting the site would have been notified according to Subdivision Ordinance Code Notification Procedure. As it is, they have never received their due process. The site was not mentioned to the Planning Board nor was it mentioned to Staff. I also object to the signing and certification of the Preliminary Plat by the Director of Planning on December 21, 2021 as another violation of Subdivision Ordinance Code since the ADEQ approval has not yet been given, a requirement of code before it can be signed. There are other discrepancies of this kind. Therefore, I argue that the ADEQ condition for NPDES permit approval which first requires site plan approval by the County cannot have been met on this point. The approval from the County was flawed and needs to be corrected or it will taint any approvals that rely upon it. The developer needs to be told to re-submit it properly.
2. The history of the developer as a "Bad Actor" in managing existing WWTPs cannot be discounted and must be considered before issuing a permit with ADEQ's name on it for yet another irresponsibly run sewage facility. Now the ADEQ knows his history. The "Bad Actor" title is well-earned if one only looks at the ADEQ website to see the stack of violations with the existing Waterview Estates WWTP owned by this same developer. I issued a complaint on your website on January 24, 2022 when powerful fumes emanating from it could be detected while driving on Highway 300 with my windows up from the hours of from 6:30am – 8:30am. This is what the people of Roland can expect.

3. The Arkansas Department of Health (ADH) conducts site inspections as part of the review process. These inspections identify potentially adverse public health impacts that might occur as a result of the treated sewage. Has this been done? Clearly defined receiving streams should be utilized. This tributary is an intermittent first-order stream and smallest of the world's streams with little to no flowing water. Hazardous sewage and algae blooms will sit until the next storm. If there ever was an inappropriate use of a stream for a WWTP, Paradise Valley is Exhibit A. As an aside, I think the Construction Permit for this development, AR0053210C, fails to include a stream segment in #11. There is both a resequent and an obsequent stream to be added to the description.
4. In a letter dated September 20, 2021, the Maumelle Water Corporation expresses concern regarding the impact of the WWTP on their aquifers and wells. This was never answered by the ADEQ. I share this concern and also question the impact of stormwater runoff from the subdivision as well into the Mill Bayou Watershed. What will the long term effects be especially when the subdivision adds another WWTP to accommodate the 450+ homes at full build-out? A study should be responsibly conducted before issuing this permit.
5. The WWTP will affect an archeological site near there and an Arkansas treasure. Aside from the optics of this desecration, what of the damage this site will bear as stormwater and additional WWTPs are added? Is the ADEQ willing to take full responsibility for this erosion knowing the history of this "bad actor"?
6. This "bad actor" developer has other better options than the one this permit represents, which will poison Mill Bayou, and an affront to everything ADEQ stands for. The original plans for Paradise Valley (f.k.a. "Saddle Ranch") included a pump station sending the sewage to an existing WWTP for Waterview Estates for example. Discharging into Mill Bayou at this location is a forced solution.

Sincerely,

Kristy Eanes
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