

**Koon, Nancy**

---

**From:** Nick Valdez <nickvaldez@gmail.com>  
**Sent:** Thursday, March 31, 2022 2:19 PM  
**To:** Water Draft Permit Comment  
**Cc:** pmccarkansas@gmail.com  
**Subject:** Discharge Permit Number AR0053210, AFIN 60-05010  
**Attachments:** Valdez ADEQ Letter.pdf

Mr. Khan,

Please find my attached letter in reference to Discharge Permit Number AR0053210, AFIN 60-05010 for Paradise Valley sewage treatment facility on Roland Cutoff Road, Roland, AR.

Best Regards,  
Nick Valdez

Faizan Khan  
Permits Branch, Office of Water Quality  
Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

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

Dear Mr. Khan,

As a constituent of Roland, Arkansas (Pulaski County) I benevolently request your review and denial of the aforementioned sewage treatment facility Permit AR0053210, AFIN 60-05010. I would like to humbly request the Division of Environmental Quality please have consideration for a public hearing to be held on the related issues associated with the impact of the approval of Permit AR0053210, AFIN 60-05010. I write to you in the hopes that the Division of Environmental Quality's review of the Discharge Permit Number AR0053210, AFIN 60-05010 is approached from a broad-minded receptive nonpartisan perspective. My name is Nicholas Valdez and I am a land owner, constituent, tax payer, and water/wastewater professional in Roland, Arkansas (Pulaski County). My property is directly impacted, as a neighboring lot to the proposed wastewater treatment facility. As a professional in the Water/Wastewater industry I have firsthand knowledge and experience related to the impacts that package sewage treatment plants can have, on a community, from an ecological, environmental, and economical standpoint.

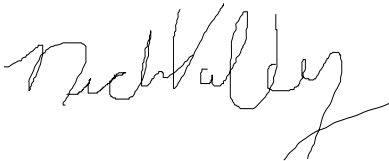
In my profession I am the Director of Manufacturing for water and wastewater lift stations, treatment stations, controls, monitoring systems, pumps, and service. My organization has been in and supporting the water/wastewater industry since 1974. My organization employs individuals that have committed their careers to the betterment of the water/wastewater industry and have been recognized as industry leaders in our segment. As a supplier, service provider, and engineering provider to this segment my teams and I work directly on applications very similar to Paradise Valley sewage treatment facility on Roland Cutoff Rd, Roland, AR. Upon the review of the application submitted to the Division of Environmental Quality, my engineering team has many concerns that they feel would warrant Discharge Permit Number AR0053210, AFIN 60-05010's denial. M. Whitaker, Professional Civil Engineer Iowa, reviewed Discharge Permit Number AR0053210, AFIN 60-05010 and the proposed treatment facilities submittal to find that there are concerning details that need to be addressed before Discharge Permit Number AR0053210, AFIN 60-05010 approval is granted. These details would have serious impact on the treatment facility's ability to handle the proposed 50,000 GPD influent thus greatly diminishing the effluent quality being discharged into Mill Bayou. Her concerns also extend into the proposed handling of the bio-solids coming into the facility on a daily basis. The proposed facility requires the solids filter screens be managed and clean daily. The lack of a dedicated, "staff," operator for this facility's required daily maintenance, per the submittal package and specifications, of the proposed package treatment plant has a high probability to yield less than optimal performance from the facility. The diminishing performance of the facility will have a proverbial "downstream" effect thus diminishing the quality of the effluent.

Diminishing effluent quality will fall outside of the standards established by the "Ten States Standards" for wastewater treatment facilities. "Ten State Standards" reference state and local Department of Health and Division of Environmental Quality's requirements for effluent quality discharged. These requirements are not subject to interpretation and have to be maintained under the requirements for Discharge Permit Number AR0053210, AFIN 60-05010 application. Under Discharge Permit Number AR0053210, AFIN 60-05010, if granted approval, the wastewater treatment facility has the potential to greatly impact our community and greatly impact our environment. Effluent that does not meet the requirements of the Department of Health and the Division of Environmental being dumped into Mill Bayou will have a drastic ecological impact on Roland and subsequently environments downstream.

The continuous rise and fall of waterways, due to varying quality of effluent based on the operational capacity of the treatment facility, 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.

In closing, again I benevolently request your broad-minded receptive nonpartisan review and denial of the aforementioned sewage treatment facility Permit AR0053210, AFIN 60-05010.

Respectfully,

A handwritten signature in black ink, appearing to read "Nicholas Valdez". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nicholas Valdez

23407 Roland Cutoff Rd

Roland, AR 72135

03/31/2022