



ARKANSAS

ENERGY & ENVIRONMENT

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (9489 0090 0027 6226 5107 32)

July 14, 2022

Rick Ferguson, Chairman
Pulaski Co. Property Owners Multipurpose Improvement District No. 2021-2
P.O. Box 23670
Little Rock, AR 72221

RE: Paradise Valley Subdivision WWTP
NPDES Draft Permit: AR0053210; AFIN: 60-05010

Dear Mr. Ferguson:

During processing of the NPDES permit application and review of the comments submitted on the draft permit, the Division determined that the construction cost estimate provided for use in calculation of the Nonmunicipal Domestic Sewage Treatment Works (NDSTW) initial trust fund fee does not include the full cost of the facility components and equipment that will make up the proposed nonmunicipal domestic sewage treatment works. Arkansas Code Annotated (A.C.A.) 8-4-203(b)(4)(B)(ii)(b) requires the initial fee to be calculated as follows:

The initial trust fund contribution fee required by the division for a new nonmunicipal domestic sewage treatment works is ten percent (10%) of the estimated cost of construction of the new nonmunicipal domestic sewage treatment works as certified by the engineer of record.

The construction cost estimate provided by the engineer of record includes line item 1 as follows:

1. *Assemble treatment plant equipment \$100,000.*

DEQ confirmed through communication with the engineer of record that the construction cost estimate does not include the cost of the facility components and equipment that will make up the proposed nonmunicipal domestic sewage treatment works as part of the total cost of construction of the proposed facility.

The cost estimate must include all facility components, equipment, and installation cost, and include the cost to install, repair or replace the following required facility components as proposed in the application:

- Emergency generator, and
- Components identified for replacement in the NDSTW Certification Form – *Paradise Valley WWTP Capital Expenditures Schedule*, including but not limited to pumps, panels,

aerators, and blowers. Repair or replacement of the identified components will be required before facility operations may begin.

The cost estimate must be revised in accordance with requirements of A.C.A 8-4-203(b) before DEQ can continue processing the NPDES permit application for this facility. Please update all portions of the NDSTW Forms and attachments to complete this request.

If you have any questions concerning this matter, please feel free to contact the Office of Water Quality at (501) 682-0656.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Leamons", with a long horizontal flourish extending to the right.

Bryan Leamons, P.E.
Senior Operations Manager, Office of Water Quality
Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118

cc: Rick Ferguson (ferguson.office@gmail.com)
Doug Ford (DFord@pmico.com)