



ARKANSAS

ENERGY & ENVIRONMENT

October 28, 2021

Rick Ferguson, President
Southwest Equity Investments, LLC
P.O. Box 23670
Little Rock, AR 72221

RE: Southwest Equity Investments, LLC – Paradise Subdivision WWTP
NPDES Permit No. AR0053210, AFIN: 60-05010

Dear Mr. Ferguson:

The Division of Environmental Quality's (DEQ) review of the NPDES Individual Discharge Permit application for the referenced facility and permit number is currently on hold. Please note the following deficiencies and items required for continuation of the permit review process:

1. Arkansas Department of Health (ADH) approval of the project and NPDES Individual Discharge Permit application; the State Construction Permit AR0053210C also requires ADH approval before construction activities for the facility may begin.
2. Nonmunicipal Domestic Sewage Treatment Works (NDSTW) Trust Fund Certification requirements, including:
 - a full list of all necessary capital expenditures, system upgrades, or significant repairs that may be needed within the following five (5) years;
 - a financial plan that demonstrates to DEQ's satisfaction the permittee's financial ability to operate and maintain the NDSTW for five (5) years along with a summary of the number and types of connections; a plat for the area served by the NDSTW that includes the wastewater treatment plant itself; and
 - a list of potable water sources and suppliers for the service area.

The items must be stamped by a Professional Engineer (P.E.) licensed in Arkansas. Specifically, the Financial Plan was identified as incomplete; it must be submitted in consideration of all requirements and including all known updates in pursuit of these requirements.

3. Certification of Compliance: The project and the applicant must be in compliance with all local zoning laws, local planning authority regulations, local permitting requirements, and all other local regulations necessary for both the construction and operation of the facility. Although a signed certificate of compliance for the referenced requirements was received with the permit application, DEQ was informed that the local regulatory approvals were based on prior versions of the facility's plans. DEQ requires a certification of compliance with the aforementioned ordinances and regulations for the same plans and specifications

submitted to DEQ for review.

Please cure the above defects within sixty (60) days to allow DEQ staff to continue to process your application.

If you have any questions concerning this matter or need additional information, please feel free to contact the Office of Water Quality at (501) 682-0623.

Sincerely,

Alan J. York
Associate Director,
Office of Water Quality, DEQ
5301 Northshore Drive, North Little Rock, AR 72118

cc: Doug Ford, P.E., Consulting Engineer: dford@pmico.com