



United States Department of the Interior
NATIONAL PARK SERVICE
Buffalo National River
402 N. Walnut, Suite 136
Harrison, AR 72601

IN REPLY REFER TO:

1.A.1 (BUFF)

June 2, 2017

Becky Keogh
Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Dear Director Keogh:

This letter is in reference to the proposed renewal for the Marble Falls Sewer Improvement District (MF-SID) permit AR0034088 – AFIN 51-00011.

Upon reviewing the proposed permit and related records found in the ADEQ PDS database, we have serious concerns about the re-issuance of this permit. According to recent records, the facility was inspected four times in 2014-2015. During this time, inspectors noted eighteen (18) permit violations. While we do not find a record of inspection for 2016, it is noted that there were no discharges from the waste water treatment plant in 2016 and 2017. This may indicate a facility and/or supply system that is not functioning properly.

We estimate the facility served approximately 30 customers in 2016-2017, including one commercial customer with a restaurant, yet there is no record of discharge leaving the treatment plant. This may be an indication that effluent is not actually reaching the treatment plant and, instead, may be leaching into the underlying soil and bedrock. As you know, this area of the Buffalo River watershed is underlain by karst. Any leakage of the gravity main can infiltrate to the groundwater via fractures, solutionally enlarged fractures, or cave passages. Once in the groundwater, the effluent can be directed toward the Buffalo River, likely via Mill Creek. A thorough groundwater dye tracing study from the gravity main should be undertaken by an investigator who is familiar with dye tracing in karst areas such as this. Such a study would determine which sections, if any, of the gravity main are losing effluent, where that effluent is transported, and how long it takes

to move from the main to its resurgence. The National Park Service (NPS) has conducted a number of studies in the Buffalo River watershed, and particularly in the Mill Creek area to better understand the groundwater flow, but significant information gaps remain. As NPS and ADEQ have a shared responsibility to protect the water quality of the Buffalo River, we remain ready to assist this effort in any way we can.

We also note that the MF- SID is under Consent Decree CV-2010-10-1. Until MF-SID has completed necessary work to be relieved of this legal obligation under the decree, we remain concerned about the granting of an additional 5 year permit.

Thank you for the opportunity to comment on this very important project. I look forward to your response.

Sincerely,

A handwritten signature in blue ink that reads "Kevin G. Cheri". The signature is written in a cursive style with a large initial "K" and "C".

Kevin G. Cheri
Superintendent