

APAC-Central NPDES General Stormwater Discharge Permit Draft Comments

1.3.2 Authorized Non-Stormwater Discharge

We suggest expanding the use of non-process water for the purpose of dust suppression to include uncontaminated roads and aggregate stockpiles.

3.1.5 Exceptions for Routine Facility Inspections for Inactive and Unstaffed Facilities

Regarding “Inactive mining facilities that have not completed reclamation are not eligible for an Inactive and Unstaffed facility Waiver”, we feel a more appropriate wording would be “Inactive mining facilities are eligible so long as there are no industrial materials or activities exposed to stormwater.” Similar wording is in use in an adjacent state’s general stormwater discharge permit.

Under the current language would sites that have an active mining permit but have not undergone any mining activities be ineligible for this waiver?

4.2.7 Receiving Stream

The basis for using five (5) stream miles as opposed to some other corridor length is not stated and a shorter distance is in use in an adjacent state.

5.4.1 Dischargers Subject to Effluent Limitations Guidelines

What is the basis for increasing sampling frequency from annually to quarterly? We suggest holding the sampling frequency at annually as exceeding effluent limits, in our experience, is rare. The previous permit language was adequate in this regard.

John Paul Williams

Project Engineer

APAC-Central, Inc.

A CRH Company

1010 Frontier Road

Barling, AR 72923

C +1 (479) 653-0511

E johnpaul.williams@apac.com

www.apacentralinc.com