



• P.O. BOX 724 • PHONE: (870) 962-3206 • STRONG, AR. 71765

Reply to:
Urbana Division
1236 Urbana Road
Urbana, AR. 71768

April 4, 2012

Mr. Shane Byrum
Staff Engineer
Discharge Permits Branch, Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
byrum@adeq.state.ar.us

Re: Anthony Forest Products Company – Urbana Sawmill
Draft NPDES Permit Comments – NPDES Permit No. AR0047384 – AFIN 70-000368

Dear Mr. Byrum:

Anthony Forest Products Company – Urbana Sawmill (Anthony) has reviewed the above referenced draft NPDES permit and offers the following comments.

1. Page 1 of Part IA Permit Requirements added Total Suspended Solids concentration limits to our discharge limitations.

The TSS effluent limits in the previous permit were not concentration limits but were listed as report only. The draft permit lists numerical limits of 35 mg/L as a monthly average and 53 mg/L as a daily maximum. The Fact Sheet stated that due to a lack of technology based limits or water quality limitations, the limits have been determined based on best engineering judgment using the typical values associated with this type of facility to ensure the narrative criteria for solids, floating materials and deposits are not exceeded. The draft permit already contains debris limitations and a requirement that there can be no discharge of distinctly visible solids, scum or foam of a persistent nature, nor shall there be any formation of slime, bottom deposits, or sludge banks. We feel these requirements coupled with the requirement to collect and report TSS adequately covers necessary compliance requirements. We request that the TSS limits listed in the draft NPDES Permit be removed and report only requirements be continued through the next permitting cycle. If the limits are not removed, we request a 3 year compliance schedule associated with the new limits as is allowed by Regulation 2.

2. Page 1 of Part IA Permit Requirements changed our Dissolved Oxygen concentration limit from a 2.0 monthly average minimum to a 2.0 instantaneous minimum.

We are unsure of why this limitation was altered. We request that the limit in the final NDPEs Permit be changed back to a 2.0 monthly average minimum. We request clarification for the change.

3. **Page 1 of Part 1B states requirements associated with acquiring a licensed operator for the treatment system. Part II Other Conditions, Number 1 states within six months after the effective date of the permit, the operator of this wastewater treatment facility shall be licensed as Class I by the State of Arkansas in accordance with Act 1103 of 1991, Act 556 of 1993, Act 211 of 1971, and Regulation No. 3, as amended."**

We understand the reasoning for requiring that Urbana obtain a Class I license. However, we are concerned that six months is not an adequate amount of time to obtain the appropriate license. We request that the time frame be extended to one year in the final NPDES Permit.

4. **Page 2 of Part II, Other Conditions, Number 8 requires that storm water be managed with BMPs to control the quality of storm water discharges.**

It is our understanding that ADEQ is using BMP requirements in lieu of numerical requirements in association with storm water discharges. Our permitted Outfall has numerical requirements to monitor the quality of the storm water discharges. If we are meeting our permit limits, we are obviously implementing appropriate management practices which therefore removes the necessity to include BMP requirements in our NPDES Permit. We request that this condition be removed from the final permit.

We greatly appreciate the opportunity to present these comments and look forward to the resolution of these issues. If you have any questions, please do not hesitate to contact Kelly Olivier at (870) 962-3206 or Russell McLaren with GBM^c & Associates at 501-847-7077.

Respectfully Submitted,
Anthony Forest Products Company
Urbana Sawmill


Stephen Murphy
General Manager

cc: Russell McLaren, GBM^c & Associates