

From: [Dennis Benson](#)
To: [Water Draft Permit Comments](#)
Subject: Comment
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When evaluating annual reports and analytical data submitted by the permittee during the last permit cycle, did ADEQ check to see how many of the pH measurements exceeded holding time. Most of the smaller facilities rely on the contract laboratory to perform their pH measurement, however, since the holding time for pH is only 15 minutes it is impractical for contract laboratories to do the pH analysis. The contract lab would have to bring their pH meter to the industrial site and analyze for pH during a measureable rain event. Considering the number of permittees and number of contract laboratories, most of the pH analysis performed by contract laboratories under this permit do not meet holding time limits. This means to be in compliance with the permit as it relates to pH analysis, the smaller facilities will have to obtain the appropriate pH meter and set up a quality control program for the pH analysis (duplicates and statistical analysis). An appropriate pH meter costs are between \$200 and \$1000 and annual pH buffers (standards) add another \$50 in annual costs. This is a hidden cost in this permit that should be considered as part of the economic impact. Additionally, I believe the permit itself should clearly point out the holding time of the pH sample to put the permittees on notice about this parameter.



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