

From: [McLaren, Russell](#)
To: [Water Draft Permit Comment](#)
Cc: [Chivers, Stanley A](#); [McMaster, Wesley](#); [Parker, Charles Brent](#)
Subject: Draft Arkansas General Stormwater Permit for Industrial Users (ARR000000) Comments
Date: Thursday, July 19, 2018 9:48:07 AM
Attachments: [AR_18-038 - Draft Arkansas Stormwater General Permit Comments.pdf](#)

Please find attached Entergy's comments on the Draft Arkansas General Stormwater Permit for Industrial Users. If you have any questions or require any clarification or additional information please don't hesitate to contact me.

Thank you.

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David Triplett, Manager
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AR-18-038

July 19, 2018

General Permit Section
ADEQ Office of Water Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118
water-permit-application@adeq.state.ar.us

Subject: Arkansas General Storm Water Permit for Industrial Dischargers – NPDES Permit ARR000000; Draft Permit Comments

We are in receipt of and have reviewed the draft Arkansas General Stormwater Permit for Industrial Dischargers ARR000000 and have prepared the following comments:

1. Section 3.8.2.2 Measurable Storm Events:

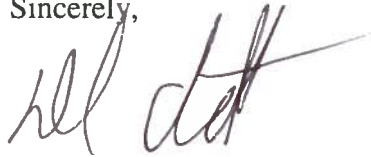
This section discusses the definition of a measurable storm event as it relates to sampling procedures. Required monitoring must be performed on a storm event that results in an actual discharge from the site ("measurable storm event") that follows the preceding measurable storm event by at least 72 hours (3 days). The last paragraph of the section states ... *"For discharges from stormwater detention ponds, the measurable storm event begins when the pond begins to discharge. The sample must be taken within the first 30 minutes of the discharge from the pond."*

The current Stormwater General Permit sampling requirements are written to address collection of samples that are not collected from a detention pond. The small paragraph added to the draft permit addressing detention ponds is not adequate to cover sampling from ponds or the reporting that goes with the Stormwater Annual Report (SWAR). A stormwater detention pond could hold water from several rain events before discharging. This is a good use of the pond for best management practices purposes. We recommend that a section be added to the sampling requirements addressing the collection of storm event samples from a detention pond. The section should address the collection of samples for ponds with controlled discharges and ponds with simple overflows. We also recommend that grab samples be allowed from ponds even if the pond is not discharging. If the pond has adequate retention, a grab sample at any time would be representative of a

discharge. The SWAR should also be edited to include a box that asks if the sample was collected from a pond. This should automatically negate the need to list the estimate of the rainfall or the time since the last measurable event.

We appreciate the opportunity to review and comment on the draft and look forward to resolving any issues before the finalization of the permit. If you have any questions or require additional information, please contact Russell McLaren or me at 501-377-4038 or 501-377-4030, respectively.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David Triplett', with a long horizontal flourish extending to the right.

David Triplett
Manager, Arkansas Environmental Support

DCT:rbm

cc: Eugene Knighten
Clay McMaster
Gary Herrin
Bob Hughey
Stan Chivers
Tom Burger
Brent Parker
File: 8206.1
8209.1
8212.1
8214.1
8215.1