

**From:** [Pennye Bray](#)  
**To:** [Water Draft Permit Comment](#)  
**Cc:** [Stan Jorgensen](#); [Julie McCallister](#)  
**Subject:** ARR000000  
**Date:** Friday, July 20, 2018 11:37:52 AM  
**Attachments:** [image003.png](#)  
[ECCI IGP comments 2018.doc.docx](#)

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Good Morning,

Attached you will find comments regarding the Draft Renewal of the Arkansas Industrial General Stormwater Permit (IGP). Thank you.

Sincerely,



Pennye L. Bray  
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July 20, 2018

Mr. Caleb Osborne, Associate Director  
Office of Water Quality  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118

RE: Draft IGP Permit Renewal ARR000000

Dear Mr. Osborne;

I would first like to commend the staff for their hard work in publishing the Draft SW IGP almost a year early. This will allow the industries within the state to continue to operate seamlessly and new facilities will be able to obtain coverage under the permit with few complications.

I would like to offer the following comments to the Draft IGP Renewal.

**1. Section 1.6.6 and 1.6.7 – Allowable Non-stormwater Discharges**

The word “uncontaminated” was added to the beginning of the two sentences describing allowable discharges of building wash down water and pavement wash waters. This change is not identified in the Fact Sheet. Permittees need to be aware of this change as it impacts what is allowable in terms of washing down specific areas of their facilities.

**2. Section 3.10.2** - What is the justification for changing the language to no longer allow permittees to use alternate benchmark values if ADEQ does not specifically respond to their request. The fact sheet discusses deletion of the sentence but does not explain the reasoning behind the change in the requirement.

**3. Section 7.8.5** – This section is new to the permit and should be included in the Fact Sheet so that permittees that discharge into MS4 know that if the permit requires submission of the NOI and any other signed/certified submissions requested by the MS4.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Penny L. Bray", is written over a light blue rectangular background.

Pennye L. Bray, REM, REPA  
ECCI Senior Project Manager