



Arkansas Department of Health

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Governor Asa Hutchinson

Nathaniel Smith, MD, MPH, Director and State Health Officer

Via email

November 30, 2017

Mr. Robert E. Blanz, PhD, P.E.
Chief Technical Officer
Office of the Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: Objection to Removal of Domestic Supply Designated Use, Town Branch, Holman Creek
Third-Party Ruling Huntsville WWTP

Mr. Blanz:

This letter serves to reiterate ADH's objection to the removal of the domestic supply designated use for both Town Branch and Holman Creek as proposed in the referenced rulemaking. As you know, Town Branch and Holman Creek are tributaries of War Eagle Creek in the watershed of Beaver Lake, a source of drinking water to over 400,000 Arkansans. The Arkansas Department of Health has consistently maintained that the domestic water supply use designation is appropriate and necessary for all streams within the Beaver Lake watershed. Pollution that enters the lake from Town Branch and Holman Creek will have a direct effect upon water quality in this drinking water supply lake. While the water supply intake structures on Beaver Lake themselves are not located on either Town Branch or Holman Creek, they are nevertheless vulnerable to mineral pollution that might occur on those reaches.

Originally, the Secondary Drinking Water Standards for chlorides, sulfates, and total dissolved solids were included in the federal Safe Drinking Water Act based solely upon issues relating to palatability. However, recent events in Flint, Michigan have clearly demonstrated that dissolved chlorides can have deleterious effects upon plumbing corrosion rates even when concentrations are below the secondary standards. This complicates drinking water systems efforts to minimize consumer exposure to lead and copper and can also increase drinking water treatment costs.

Additionally, with regards to the protection of downstream designated uses, the federal regulations state, "In designating uses of a water body and the appropriate criteria for those uses, the State shall take into consideration the water quality standards of downstream waters

and shall ensure that its water quality standards provide for the attainment and maintenance of the water quality standards for downstream waters” [40 C.F.R. §131.10(b)].

For these reasons, ADH requests that Exhibit E, Economic Impact/Environmental Benefit Analysis: 2B. ENVIRONMENTAL BENEFIT, be revised to reflect that War Eagle Creek is a major tributary to Beaver Lake, a drinking supply lake that serves a growing community of over 400,000 Arkansans, and that costs associated with any future degradation of the watershed could result in increased treatment costs for the four community public water systems located there. Additionally, ADH requests that all Exhibits and documents mentioning ADH within the current proposed rulemaking reflect our opposition to the proposed rulemaking and the removal of the domestic supply designation for Town Branch and Holman Creek.

If public water supply sources—including Beaver Lake—are to remain high quality drinking water sources, it will require all relevant governmental bodies to include an awareness of and concern for drinking water protection as part of their decision-making processes. The Arkansas Department of Health will continue to be a voice for drinking water source protection and to encourage all stakeholders to adopt regulations protective of drinking water sources in their policy decisions.

Sincerely,



Jeff Stone, PE
Director Engineering Section
Arkansas Department of Health

Cc: Beaver Water District
Benton-Washington Regional Public Water Authority
Madison County Regional Water
Carrol-Boone Water District