# Arkansas Department of Health

4815 West Markham Street • Little Rock, Arkansas 72205-3867 • Telephone (501) 661-2000
**Governor Mike Beebe**
**Nathaniel Smith, MD, MPH, Interim Director and State Health Officer**

Engineering Section, Slot 37
www.HealthyArkansas.com/eng/
Ph 501-661-2623
Fax 501-661-2032
After Hours Emergency 501-661-2136


February 27, 2014

Mr. Tim Nyander
Manager
Fayetteville Waterworks
113 West Mountain
Fayetteville, AR 72701

RE: Public Comments
"White River Use Attainability Analysis—Fayetteville, Arkansas" Report posted 10/11/2013
Third Party Rulemaking
City of Fayetteville, Washington County, AR
APC&E Docket # 13-010-R

Dear Mr. Nyander:

The UAA Report for the above-referenced project has been reviewed, and ADH-Engineering staff has the following comments.

ADH is opposed to the removal of the domestic water supply designated use from any stream within the watershed of Beaver Lake, a source of drinking water for 4 regional public water systems which supply drinking water to much of Northwest Arkansas. These systems and their population served are listed, below:

| Public Water System | Total population served |
|---|---|
| Beaver Water District | 261,468 |
| Benton-Washington Regional | 72,672 |
| Carroll-Boone Water District | 31,895 |
| Madison County Regional | 11,092 |
| **TOTAL POPULATION** | **377,127** |

The Paul R Noland Wastewater Treatment Plant is located and discharges treated effluent into an impaired stream segment of the White River. Beaver Water District, serving a total population of 261,468 Arkansans, uses raw water in an impaired segment of Upper Beaver Lake.

The following table summarizes the watershed impairments adjacent the Noland Plant.

| Name | Relation to Discharge Point | HUC/Planning | Designated use not met: Impairment |
|---|---|---|---|
| West Fork White River | Upstream | 1101001-024-4K | Fisheries: Temperature, Turbidity, Sulfates, Total Dissolved Solids |
| White River | Point of discharge | 1101001-023-4K | Turbidity, Sulfates |
| Upper Beaver Lake | Downstream | 1101001 | Aquatic Life, Primary Contact: Turbidity, Pathogens |

Waterbodies impaired by minerals or turbidity can significantly increase the cost of treatment required to meet Safe Drinking Water Act standards. They can also increase the risk of exposure to regulated pathogenic contaminants. For example, high sediment in a stream increases the cost for the water utility to meet the drinking water standard for turbidity, and sediment is one indicator of the increased presence of microbiological contaminants in the source water, including *E. coli*, *Giardia lamblia* and *Cryptosporidium*.

ADH requests that any effluent from the WWTP should include concentration limits on TDS, chlorides, and sulfates that meet the Secondary Maximum Contaminant Levels. The national secondary MCLs for TDS, chlorides, and sulfates in drinking water are 500, 250, and 250 mg/l, respectively.

Sincerely,

Lance A. Jones, P.E.
Chief Engineer
ADH Engineering Section

LJ:LG:CC:CH:BB:KB:CWR:DR:sb

cc: Hon. Charles Moulton, APC&EC Administrative Hearing Officer, APC&EC Docket # 13-010-R
Mr. Doug Szenher, Public Information Officer, ADEQ, APC&EC Docket # 13-010-R
Jeff Stone, P.E., Director, Engineering Section, ADH
Dr. Joseph Bates, Deputy State Health Officer, Chief Science Officer, & Science Advisory Committee Chair, ADH