



# 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/](http://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
<b>TOTAL POPULATION</b>	<b>377,127</b>

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.

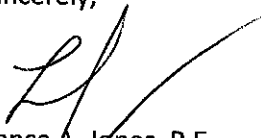
The following table summarizes the watershed impairments adjacent the Noland Plant.

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:LJ: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