



February 5, 2025

Submitted via email to EE.comment@arkansas.gov

**RE: Part 21 (Rule 2) Proposed Changes to the Rule Establishing Water Quality Standards for
Surface Waters of the State of Arkansas
Comment on Proposed Rule Change**

Dear Ms. Gober,

This letter provides an American Electric Power Service Corporation (AEP) comment on the proposed amendments to the Arkansas Pollution Control and Ecology Commission's Rule 2, Establishing Water Quality Standards for Surface Waters of the State of Arkansas. We appreciate the opportunity to provide this comment to the Arkansas Department of Environmental Quality (ADEQ) on behalf of our subsidiaries that operate in the State of Arkansas.

Proposed Ammonia Limits, 8 CAR §21-512.

The revision of chronic ammonia water quality standards no longer accounts for presence versus absence of fish early life stages. In addition, the proposed water quality standards for warm waters where fish early life stages are present would be reduced by approximately half, with water quality standards reduced by an even greater percentage for warm waters where fish early life stages were designated as absent. The reduction is so significant that for warm waters with high pH, AEP is concerned that the water quality standard will be below the reporting limit (RL) for laboratories we have used in the past, and that accurate monitoring results will not be feasible, even if limits are above the method detection limits. AEP encourages ADEQ to keep the limited capabilities in sample analysis in mind when using these water quality standards to develop permit limits. AEP also requests that ADEQ reconsider applying separate water quality standards based on fish early life stage presence.

If there are any questions or further information is needed, please contact me at (614) 716-2224 or mcgildow@aep.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Marie C. Gildow". The signature is fluid and cursive, with the first name "Marie" being more prominent.

Marie C. Gildow
Environmental Engineer Principal
AEP Environmental Services