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JARED D. WILEY, P.E.
DIRECTOR

February 5, 2025

Ms. Melissa Gober
Department of Energy and Environment
5301 Northshore Drive
North Little Rock, AR 72118

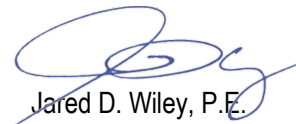
Dear Ms. Gober:

Reference is made to the Arkansas Department of Energy and Environment, Division of Environmental Quality's (DEQ) proposed amendments to the Arkansas Pollution Control and Ecology Commission Rule 2, "Rule Establishing Water Quality Standards for Surface Waters of the State of Arkansas". The Arkansas Department of Transportation (ARDOT) provides the following comments regarding the proposed amendments.

- It is recommended that adequate information/procedures be included in the proposed rule to allow permittees to calculate their new permit limits. This information is necessary to adequately assess the potential impacts of the proposed changes.
- It is unclear how the removal of the fecal coliform standard will affect permittees. Clarification is needed to inform permittees on what the new standard will be and how DEQ will assess the permit limits.
- Implementation of any proposed amendments should be part of the regular permitting renewal process unless some other action by the permittee triggers a permit modification.
- As a state agency and member of the regulated community, ARDOT requests to be a stakeholder for discussions of amendments affecting water quality standards.

Thank you for the opportunity to comment on the proposed amendments. Should you have any questions regarding our comments, please contact Josh Seagraves, Division Head - Environmental, at (501) 569-2281 or Josh.Seagraves@ardot.gov.

Sincerely,



Jared D. Wiley, P.E.
Director

c: Highway Commission
Chief of Administration
Chief Engineer – Operations
Chief Engineer – Preconstruction
Assistant Chief Engineer – Maintenance
Assistant Chief Engineer – Planning
Environmental
Maintenance