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Sent: Friday, September 23, 2016 11:00 AM

To: Reg-Comment

Cc: Steven.Carpenter@ch2m.com; Mayo.Miller@ch2m.com; Jeff.Heroux@CH2M.com; Gilliam, Allen

Subject: Comments on Proposed Revisions to Regulation 6

To whom it may concern,

These comments pertain to proposed revisions to APC&EC Regulation 6 (Regulations for State Administration of the National Pollutant Discharge Elimination System (NPDES)).

References are to the document at the link titled “**8/12/2016 – DRAFT Regulation 6 Markup**” with the link address <https://www.adeg.state.ar.us/regs/drafts/reg06/16-004-R/reg06-draft-docket-16-004-r-ex-a-markup.pdf> on the ADEQ web page <https://www.adeg.state.ar.us/regs/drafts/reg06/16-004-R/>.

In Exhibit A, on page 2-5, Reg.6.204 contains language for industrial user discharge to a POTW WITH an approved program (6.204(B)), and industrial user discharge to a POTW WITHOUT an approved program (6.204(C)).

In 6.204(B), the language specifies that the industrial must comply with the more stringent of federal pretreatment standards or POTW local limits and pretreatment standards.

In 6.204(C), because the phrase “*more stringent*” is omitted, the language implies that the industrial user would be in compliance by meeting EITHER Categorical standards, OR POTW NPDES pretreatment conditions OR local ordinances, rather than having to comply with the most stringent requirement.

Incorporating the clause “more stringent” into 6.204(C) will eliminate this issue.

Sincerely,

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Industrial Pretreatment Coordinator

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