Arkansas Department of Health

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March 10, 2016

Sarah Clem
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72218
email: ImpairedWaterbodies_Comments@adeq.state.ar.us

RE: Comments on ADEQ 2016 Draft Impaired Waterbodies List 303(d)

Dear Ms. Clem,

Attached is a table listing 13 of the proposed impaired stream or lake segments and the 10 public water systems—serving a total population of 638,851 Arkansans—who may be potentially impacted by them. This table was compiled by comparing the recently-issued ADEQ draft 303(d) impaired waterbodies list for 2016 and GIS geodatabases to surface water intake locations and their respective watershed protection areas for public water systems (PWS) in the state. The table includes specific stream or lake information compiled by ADEQ, the affected public water system(s) with an intake or source assessment zone within the impaired segment, and the population served by the water system. Turbidity, pH, pathogens, and nitrogen are of particular concern for drinking water supplies; additionally, mercury/fish consumption advisories are a public health issue for the general public, given the toxicity and bioaccumulation hazards they present.

The Arkansas Department of Health Engineering Section has primacy in the state for implementation of the federal Safe Drinking Water Act and ADEQ implements the federal Clean Water Act. The primary mission of the ADH is the protection of public health, and the strong link between safe public drinking water and public health drives our program. We recognize ADEQ shares this goal and we request your continued partnership in this worthwhile endeavor. To that end, ADH requests that drinking water sources always be a priority when determining the final 303(d) Impaired Waterbodies Listings.

Water bodies impaired by pathogens, turbidity, and/or minerals can significantly increase the cost of treatment required to meet Safe Drinking Water Act standards. Turbidity and mineral impairment 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 Primary Drinking Water Standard for turbidity, and sediment loading is one indicator of the increased presence of microbiological

contaminants in the source water, including *E. coli, Guiardia lamblia,* and *Cryptosporidium sp.*, further increasing treatment costs.

We request your assistance in placing a high priority on protecting these vulnerable drinking water sources—which serve approximately 25% of all public drinking water users—when evaluating and addressing the 2016 list of impaired waterbodies.

ADH recommends the following actions that your agency and other Clean Water Act partners could take that would reflect that priority:

1. Higher priority in protecting any in-use drinking water source.
2. Increased monitoring to better identify the temporal and spatial areas of impairment, especially for the Category 4a waterbodies, which may impact public water supplies.
3. Higher priority in identifying and correcting the sources of impairment, which remain unknown for several source waters.
4. Increased compliance scrutiny on the monitoring and operational reports of wastewater, stormwater, resource extraction, and other applicable permittees.
5. Stricter effluent standards for new and renewed permits, or a ban on new permits, when warranted in source waters.
6. The timely establishment of TMDLS in source waters.
7. Increased emphasis and coordination on controlling nonpoint pollution sources, including better utilization of EPA's extensive Source Water Collaborative resources and tool kit.
8. Preferential funding of assessment, restoration, and mitigation projects for nonpoint pollution sources.

The protection of drinking water sources (minerals, turbidity, pathogens) and the protection of public health (mercury/fish consumption) require the active engagement of both the public and all levels of government. The Department of Health will continue to pursue these goals through its public water system oversight program. Other agencies—federal, state, and local—must also contribute. Your collaborative efforts are appreciated.

Should you wish to discuss these matters further, you may call me or Darcia Routh, Geology Supervisor, at 501-661-2623.

Sincerely,

Jeff Stone, P.E.
Director, Engineering Sections

JS:LG:DR:sp

cc: J. Randy Young, P.E., Executive Director, AR Natural Resources Commission
Mary Barnett, ADEQ
Joe Bates, MD, ADH, Deputy State Public Health Officer
Terry Paul, Chief, ADH Environmental Branch

Enclosure: 2016 303(d) list impaired segments with public water system intakes

2016 Impaired Water Bodies 303(d) within Source Water Assessment Areas for Public Water Systems

Stream Name	HUC	Rch/PSeg	Use not supported	WQ Standard	Source	Public Water System	Total Population served
White River Basin							
Dota Creek	11010009	902/4G		Pathogens		Batesville (White River)	17,166
Middle Fork, Little Red River	11010014	027/4E	Primary contact	Pathogens	Unknown	Community Water (Greers Ferry)	54,324
Johnson Hole	11010014	036/4E	Fish Cons.	Hg	Unknown	Clinton (Greers Ferry)	12,788
South Fork, Little Red River	11010014	036/4E	Fish cons.	Hg	Unknown	Clinton (Greers Ferry)	
Little Red River	11010014	007/4E 008/4E 010/4E 012/4E		Pathogens		Searcy (Little Red River)	58,523
Tenmile Creek	11010014	009/4E		Turbidity, Pathogens		Searcy (Little Red River)	
Ouachita River Basin							
Lake Winona	08040203	302/2C	Fish Cons.	Hg	Unknown	Central AR Water	412,785
Arkansas River Basin							
Mulberry River	11110201	009/3H		pH		Cass	264
Cadron Creek	11110205	011/3D 012/3D		Turbidity		Conway	58,908
Fourche La Fave River	11110206	002/3E	Fish cons.	Hg	Unknown	Perryville	4,639
Red River Basin							
Rolling Fork	11140109	927/1C		Total Phosphorous, Nitrogen	Industrial source	Sevier County (Lake Dequeen)	4,454
Beech Creek	11140203	025/1A		Turbidity, DO, Pb		Magnolia (Lake Columbia)	15,000
Lake Columbia	11140203	105/1A	Fish Cons.	Hg	Unknown	Magnolia	