

From: [Ben Gilley](#)
To: [am-comments](#)
Cc: [Darcia Routh](#)
Subject: 2018 AM - 6.6 Bacteria
Date: Tuesday, October 17, 2017 11:46:55 AM

Greetings,

In section 6.6 Bacteria, Phase II Data Quality Requirements for Bacteria, it states that discrete data must be collected during primary contact season (May 1 - September 30) and that eight (8) discrete samples are required per primary contact season to be used for assessment. The Department of Health collects **monthly** bacteriological samples from source waters across the state including during the primary contact season (5 total for each source). The Phase II Data Quality Requirements seemingly would exclude ADH data as our testing regimen does not include 8 samples for those 5 months. The Department of Health's bacteriological data is a consistent data source that significantly contributes to understanding water quality in Arkansas and, for that reason, should be included in the assessment of impairment.

Thank you for taking our comments.

Benjamin Gilley
Environmental Health Supervisor
Source Water Protection
Engineering Section, AR Dept. of Health
4815 W Markham St
Little Rock AR 72205
501-661-2703
benjamin.gilley@arkansas.gov