



## Arkansas Department of Health

---

4815 West Markham Street • Little Rock, Arkansas 72205-3867 • Telephone (501) 661-2000

Governor Asa Hutchinson

Nathaniel Smith, MD, MPH, Director and State Health Officer

November 13, 2017

Sarah Clem  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: 2018 Assessment Methodology

Dear Ms. Clem,

The Arkansas Department of Health (ADH) Engineering Section appreciates the stakeholder process used for the 2018 Assessment Methodology respectfully submits the following comments.

Section 4.2 *Designated Uses* – ADH requests an amendment to Table 4 to show the inclusion of all water quality parameters pertinent to domestic water supply. As Table 4 currently shows, Minerals, Toxic Substances, and Radioactivity are the only parameters that may be considered when determining if an assessment unit (AU) attains its designated use for domestic water supply. Turbidity, pH, Bacteria, Nutrients, Ammonia, and both site-specific and non-site-specific Minerals also should be considered when determining if an assessment unit meets its domestic water supply designation.

Section 6.6 *Bacteria - Phase II Data Quality Requirements for Bacteria* states that discrete data must be collected during primary contact season (May 1 - September 30) and 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.

Section 6.6 *Bacteria – Listing Methodology* states that AUs will be assessed as non-support when the applicable standard is exceeded in greater than 25% of samples. In practice, 37.5% (3/8) of bacterial samples must exceed the standard before an AU is assessed as non-support. ADH suggests that this is too high of a

threshold to be protective of public health and requests the inclusion of data from multiple primary contact seasons to determine if an AU attains the designated use.

Please direct any comments or concerns through Darcia Routh or Ben Gilley of our office.

Sincerely,



*for*  
Lyle Godfrey, P.E.  
Chief, Technical Support  
Engineering Section

JS:LG:DR:BG:bg