

RESPONSE TO COMMENTS
FINAL PERMITTING DECISION

Permit No.: ARCC00000

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The following are responses to comments received regarding the draft permit number above and developed in accordance with rules promulgated in 8 CAR pt. 11, Administrative Procedures, and Arkansas Code Annotated § 8-4-203(e)(2).

Introduction

The above permit was public noticed for public comment on July 12, 2026. The public comment period ended on August 11, 2026.

This document contains a summary of the comments that the Division of Environmental Quality (DEQ) received during the public comment period. A summary of the changes to the general permit can be found on the last page of this document.

The following people or organizations sent comments to DEQ during the public comment period. A total of fourteen (14) comments were raised by three (3) separate commenters. One commenter submitted comments after the close of the comment period.

Commenter	Number of Comments
Eugene Pfeifer, III	1
Mark Allison on behalf of Potlatch-Deltic Real Estate LLC	12
DEQ Office of Water Quality	1

Comment 1 Eugene Pfeifer, III

The draft general permit should be eliminated in favor of simple review and approval of plans and specifications. I am a 50 year investor in residential development and providing housing at reasonable costs and offer the following reasons for my comment..

This permit goes way beyond the current responsibilities and incurs additional bureaucratic steps causing additional costs and delay. If enacted there should be a specific exemption for very small municipal systems.

There is no justification given for what environmental benefits would result from all this additional and complicated paperwork.

Our Governor has endeavored to “Make Arkansas the Best State in America to Do Business”. This is the opposite of streamlining and expeditiously permitting the approval process. In addition, our President has issued an Executive Order “Removing Regulatory Barriers to Affordable Home Construction”. This new process does the exact opposite.

Summary: Please retain a system of requiring submission, approval and inspection

Response DEQ is issuing this general permit for the construction of sanitary sewer collection systems under the authority of the Arkansas Water and Air Pollution Control Act, Arkansas Code Annotated § 8-4-101 et seq.

Pursuant to Ark. Code Ann. § 8-4-203(a)(3), “The Division of Environmental Quality or its successor is given and charged with the power and duty to issue, continue in effect, revoke, modify, or deny permits, under such conditions as it may prescribe . . . for the installation, modification, or operation of disposal systems or any part of them.”

Ark. Code Ann. § 8-4-102 provides the following definitions for disposal system and sewer systems:

Disposal system means a system for disposing of sewage, industrial waste, and other wastes and includes sewer systems and treatment works.

Sewer system means pipelines or conduits, pumping stations, and force mains, and all other constructions, devices, and appliances appurtenant thereto, which are used for conducting sewage or industrial waste or other wastes to a point of disposal.

Ark. Code Ann. § 8-4-217(b)(1) states that it shall be unlawful for any person to construct, install, modify, or operate a disposal system or any part of a disposal system without having first obtained a written permit from DEQ.

This permit complies with Arkansas Governor’s Executive Order 26-04 by creating a “one-stop” application portal to enable concurrent review by DEQ and ADH. The concurrent review will also help eliminate agency overlap and limit the duplication of agency efforts.

This general permit streamlines the permitting process in compliance with the spirit of Presidential Executive Order 14394, “Removing Regulatory Barriers to Affordable Home Construction” (91 Fed.Reg.13207), issued March 18, 2026.

Sanitary sewer collection system construction is directly connected to the protection of surface water, wastewater treatment systems, and the prevention of unauthorized discharges. Permitting the construction of sanitary sewer collection systems through the environmental regulatory agency, rather than the health department, aligns the technically appropriate regulatory framework for protecting water quality and public health. Permitting construction of sanitary sewer collection systems by DEQ will also allow the design, construction, operation, and environmental impacts of the whole wastewater treatment system, including the collection system, to be evaluated within a single regulatory framework and as an integrated system rather than regulating individual components through separate agencies. When construction, operation, and discharge oversight are all managed

by one agency, there is less regulatory fragmentation and fewer gaps or inconsistencies across system components. A single permitting authority enhances consistency, improves public transparency, and simplifies administrative oversight.

Comment 2 Ark. Code Ann. § 8-4-201(a)(4) prescribes DEQ’s duties as the “approval of plans and specifications” for disposal systems and inspection of construction for compliance with the approved plans and specifications. Compliance with this statute does not require a complete new permit program that imposes additional terms and conditions that are not necessary for approving plans and specifications. The additional terms and conditions contained in the draft General Permit will unnecessarily slow down the statutorily required plan approval process, improperly and indirectly delegate control over the plan approval process to other entities, including the USEPA and the US Army Corps of Engineers, and allow “weaponization” of the plan approval requirement by adding additional unnecessary permitting steps and conditions.

Response The commenter’s claims about allowing “weaponization” are inaccurate.

Draft General Permit ARCC00000 authorizes the construction of sanitary sewer collection systems including gravity sewer extensions, force mains, lift stations, pumping stations, storage basins considered part of the collection system, and inline storage. Collection systems are a necessary component of the sewer treatment system. If the collection systems are not adequate, raw wastewater could be discharged to waters of the state or in an area where it could come into contact with individuals. Contact with raw wastewater is a public health and environmental concern and should be avoided.

Draft General Permit ARCC00000 requires that applicants submit “plans and specifications” for the proposed construction, extension, or modification of the sanitary sewer collection system. More simply, the creation, expansion, or modification of a sewer collection system requires coverage under this general permit. DEQ approves those submitted plans and specifications through this permitting process.

It is inaccurate to suggest that this general permit delegates any authority to the United States Environmental Protection Agency (EPA) or the United States Army Corps of Engineers (COE). Draft General Permit ARCC00000, Condition 18, states:

The United States (U.S.) Army Corps of Engineers (ACE) may require a Clean Water Act Section 404 permit (404) and a DEQ Water Quality Certification (401) for the activities described in this general permit.

This condition puts the applicant on notice that activities authorized by this general permit may also be subject to Section 404 permitting under the Federal Clean Water Act. As stated in the permit, the permittee is responsible for contacting the COE to

determine permitting requirements. Please note that Arkansas does not have delegated authority over Section 404 permitting.

EPA has authority under the Federal Clean Water Act to review DEQ's discharge permits. EPA does not have authority under the Federal Clean Water Act to review DEQ's construction permits, like ARCC00000. EPA is not mentioned in this permit and has no authority to review this permit.

DEQ does not allow "weaponization" of the plan approval requirement by these federal agencies because DEQ does not allow these federal agencies to interfere with its authority to issue construction permits under Arkansas law, including ARCC00000.

Comment 3 The General Permit should expressly specify which edition and which portions of the Ten States Standards is to be used and should explain why such version is chosen. Those portions to be incorporated should have been included together with the body of the draft General Permit to allow proper public comment. In addition, if the incorporated version of the Ten States Standards is not available except by purchase from the publisher or other third parties, DEQ should make a copy of the incorporated standards readily available at no charge to persons seeking coverage under the permit.

Response The collection system is a necessary component of wastewater facilities.

Arkansas has a rule that addresses the requirements for construction of wastewater facilities, specifically: 8 CAR § 25-202. Application requirements for construction and operation of wastewater facilities.

The design criteria for wastewater treatment plants in the State of Arkansas should be based on the latest edition of the Ten States Standards.... 8 CAR § 25-202 (a)(4)(A). "Ten States Standards" means the latest edition of the "Recommended Standards for Wastewater Facilities" or "Recommended Standards for Water Works" published by Health Research, Inc., Health Education Services Division. 8 CAR § 25-103(b)(28). The Pollution Control and Ecology Commission first adopted "Ten States Standards" with certain exception as the minimum design criteria for wastewater facilities in 1973. The Pollution Control and Ecology Commission formally adopted the requirement referencing the latest version of "Ten States Standards" into its rules in 2006. Minute Order No. 06-29. Over the past 50 years, DEQ has required the use of "Ten States Standards" as the basis for design criteria for wastewater treatment plants in the State of Arkansas.

Pursuant to Ark. Code Ann. § 8-4-203(e)(2)(B)(ii), this permit requires the same standard as the applicable rule.

For any standard or requirement that is identical to an applicable federal regulation or state rule, this demonstration may be satisfied by reference to the federal regulation or state rule. Ark. Code Ann. § 8-4-203(e)(2)(B)(ii).

Comment 4 The General Permit should recognize that the Ten States Standards is intended for conventional municipal systems, and not for “very small municipal systems.” (Ten States Standards, 2014 Ed., p. V). An exclusion or exemption from the requirement for a permit should be included for such very small systems.

Response DEQ disagrees with the commenter’s paraphrasing of the statement in the Forward of Ten States Standards and refers to the whole text, which states,

The design criteria in these standards are intended for the more conventional municipal wastewater collection and treatment systems. Innovative approaches to collection and treatment, particularly for the very small municipal systems, are not included. The individual reviewing authority should be contacted for design guidance and criteria where such systems are being considered.

Ten State Standards do not exclude “very small municipal systems” from a requirement that those systems be designed properly. Ten State Standards states: “Innovative approaches to collection and treatment, particularly for the very small municipal systems, are not included.” That statement does not exempt “very small municipal systems” from the basic requirements in these standards or the need to have designs for those systems reviewed and approved through the permitting process. Further, when “very small municipal systems” grow rapidly, it is imperative that those systems are properly designed and that each expansion is evaluated.

Commission Rule 8 CAR § 25-202 (a)(4)(B) already addresses the possibility that a system could deviate from these standards by stating: “Exceptions to these criteria will only be approved by the division when fully justified.”

Comment 5 The General Permit does not explain what a “downstream sewer evaluation” is.

Response Ten State Standards, Chapter 20, 20.14 Design Criteria states, “For sewer and lift station projects, information shall be submitted to verify adequate downstream sewer pump station and treatment plant capacity.”

Comment 6 The one-year limit on beginning construction in section 14 of the General Permit is unnecessary. This time limit unnecessarily constrains project development since ultimate development of a project often depends on authorizations, permits and approvals from several other government agencies. Such a short approval period frame does not recognize the realities of project development and will result in needless duplication of submissions to DEQ and possibly other agencies.

Response Condition 14 of the permit is not a “one-year limit on beginning construction.”
Condition 14 states:

Failure to begin construction within one (1) year of the effective date may result in termination of this authorization if a request for an extension is not submitted to the Division in a timely manner.

No duplicate submissions are required. For example, if the COE has not issued a required Section 404 permit, a permittee would simply request an extension from DEQ.

Comment 7 The draft General Permit and the Fact Sheet do not explain what environmental benefits the General Permit achieves over a simply sewer collection plan approval process; instead, the permitting process creates a more complicated administrative paperwork exercise. The draft General Permit does not comply with Ark. Code Ann. §8-11-102 which states that Arkansas environmental regulatory methods should “reduce the time and money spent by agencies and facility owners and operators on paperwork and other administrative tasks that do not benefit the environment.”

Response Ark. Code Ann. § 8-11-102 states:

- (a) The improvement of the environment of the State of Arkansas is a matter of concern to all citizens of this state, and existing environmental law plays a critical role in protecting the environment.
- (b) Environmental protection could be enhanced by authorizing innovative advances in environmental regulatory methods.
- (c) Arkansas should develop environmental regulatory methods that:
 - (1) Encourage facility owners and operators to assess the pollution they emit or cause, directly and indirectly, to the air, water, and land;
 - (2) Encourage facility owners and operators to innovate, set measurable and verifiable goals, and implement the most effective pollution prevention, source reduction, or other pollution reduction strategies for their particular facilities while complying with verifiable and enforceable pollution limits;
 - (3) Reward facility owners and operators that reduce pollution to levels below those required by applicable law; and
 - (4) Reduce the time and money spent by agencies and facility owners and operators on paperwork and other administrative tasks that do not benefit the environment.

First, properly designed collection systems and expansions of collection systems are necessary to protect the environment. If the collection systems are not adequate, raw wastewater could be discharged to waters of the state or in an area where it

could come into contact with individuals. Contact with raw wastewater is a public health and environmental concern and should be avoided.

Second, the general permit requires the submission of plans, specifications, calculations, evaluations, and certifications necessary to demonstrate that the collection system is designed properly and that the wastewater it conveys can be properly treated. This information is directly relevant to documenting that this collection system is designed so that raw wastewater will not be discharged to waters of the state or in an area where it could come into contact with individuals. Preventing those discharges before they happen is an environmental benefit.

Finally, through this shift in processing, applicants will submit the information to DEQ, and DEQ and ADH will review this information concurrently.

Comment 8 The General Permit does not comply with the Arkansas Governor’s Executive Order 26-04 “To Make Arkansas the Best State in America to Do Business Through Streamlined, Clear, and Expeditionary Permitting Processes that Protect Natural Resources and Foster Economic Development.” Coverage under the permit is expressly conditioned on demonstrating compliance with rules and agency approvals from other agencies (see General Permit Prerequisites 9 and 10 and Permit Conditions 15, 16, 17, 18, 19, and 22), including but not limited to the US Army Corps of Engineers. As a result, the draft General Permit does not create or foster a “one-step” process and does not “reduce the cost of regulatory compliance.” Instead, the General Permit makes the approval process for sewer system plans and specifications more complicated, more time-consuming and more costly.

Response As stated above, this permit complies with Arkansas Governor’s Executive Order 26-04 by creating a single submission that will be reviewed concurrently by DEQ and ADH. This will also eliminate the possibility of overlapping agency actions and streamline the review of these submissions.

Coverage under the general permit is not expressly conditioned on demonstrating compliance with rules and agency approvals from other agencies.

Prerequisite 9:

Both DEQ and ADH require that wastewater be properly treated to protect public health and the environment.

Prerequisite 9 documents that the untreated wastewater from the collection system will be treated by a permitted wastewater treatment plant that has sufficient capacity to treat the increased flow of wastewater.

If the receiving wastewater treatment plant has not agreed to treat the wastewater or does not have the capacity to treat wastewater from the new collection system,

then the residences that are to connect to the collection system would not have adequate sewer service.

Prerequisite 10:

Prerequisite 10 requires that the applicant document who will be responsible for ongoing operation and maintenance of the new collection system.

Collection systems are a necessary component of the sewer treatment system. If a collection system is not operated and maintained properly, raw wastewater could be discharged to waters of the state or in an area where it could come into contact with individuals. Contact with raw wastewater is a public health and environmental concern and should be avoided.

The “agency” providing approvals under Prerequisites 9 and 10 is the agency responsible for treating the raw wastewater, operating and maintaining the collection system, or both. If a collection system cannot send its raw wastewater to a permitted treatment system, neither DEQ nor ADH should authorize its construction. If a collection system does not have an entity responsible for its ongoing operation and maintenance, neither DEQ nor ADH should authorize its construction. Once Prerequisites 9 and 10 are satisfied, DEQ may authorize the construction of the collection system through this permitting process.

Condition 15:

Condition 15 is based on 40 C.F.R. § 122.26. Condition 15 states the existing requirement for sites that must obtain permit coverage under the Stormwater Construction General Permit Number ARR150000, which DEQ issues pursuant to its delegated authority under the Federal Clean Water Act.

Nothing in Condition 15 requires that permittees obtain coverage under the Stormwater Construction General Permit Number ARR150000 or conditions coverage under ARCC00000 on demonstrating that an applicant has complied with the Stormwater Construction General Permit Number ARR150000.

Condition 16:

Condition 16 is based on Ark. Code Ann. §§ 8-4-203 and 8-4-217(b). Condition 16 states that state and federal law does not permit discharge of raw wastewater and requires that permittees take steps to prevent any discharge of raw wastewater during construction. Nothing in Condition 16 conditions coverage under ARCC00000 on a permittee taking steps to prevent any discharge of raw wastewater during construction.

A permittee who failed to take steps to prevent any discharge of raw wastewater during construction would be in violation of Condition 16. Additionally, under state and federal law, Permit ARCC00000 cannot authorize any discharge of raw

wastewater. A permittee who does discharge raw wastewater during construction could be subjected to enforcement for violations of state and federal law.

Condition 17:

Condition 17 is based on Ark. Code Ann. § 8-4-234. Condition 17 states the existing requirement for a Short Term Activity Authorization (STAA).

Nothing in Condition 17 requires that permittees obtain a Short Term Activity Authorization (STAA) or conditions coverage under ARCC00000 on demonstrating that an applicant has obtained a Short Term Activity Authorization (STAA). A permittee who performs activities requiring a STAA without receiving the appropriate authorization could be subjected to enforcement for violations of state law.

Condition 18:

Condition 18 is based on Sections 404 and 401 of the Clean Water Act. Condition 18 states the existing requirement for a Clean Water Act Section 404 permit and corresponding Section 401 Certification.

Nothing in Condition 18 requires that permittees obtain a Clean Water Act Section 404 permit or conditions coverage under ARCC00000 on demonstrating that an applicant has obtained a Clean Water Act Section 404 permit. A Section 401 Certification would be required if a Section 404 permit is required.

Condition 19:

Condition 19 states the existing requirement that protection of drinking water supplies must meet the requirements of the Arkansas Department of Health.

Previously, applicants would submit plans to the ADH. Under this permit, applicants would provide a single submission that is reviewed concurrently by DEQ and ADH. Condition 19 reflects that concurrent review. Separating this condition from the permit would result in the duplicate submissions that that Arkansas Governor's Executive Order 26-04 directs state agencies to avoid.

Condition 22:

Condition 22 states, "Permittees are responsible for compliance with all applicable terms and conditions of this general permit. Receipt of this general permit does not relieve any operator of the responsibility to comply with any other applicable federal, state, or local statute, ordinance, policy, rule, or regulation."

Permit ARCC00000 authorizes the construction of sanitary sewer collection systems, including gravity sewer extensions, force mains, lift stations, pumping stations, storage basins considered part of the collection system, and inline storage.

Condition 22 states that Permit ARCC00000 does not authorize the permittee to violate other applicable laws or rules.

Permit ARCC00000 creates a streamlined single submission that will be reviewed concurrently by DEQ and ADH. Permit ARCC00000 cannot authorize the permittee to violate other applicable laws or rules.

Neither DEQ nor ADH can waive permitting requirements under Section 404 of the Clean Water Act, which are administered by the COE.

Comment 9 The General Permit does not comply with the spirit of Presidential Executive Order 14394, “Removing Regulatory Barriers to Affordable Home Construction” (91 Fed.Reg.13207), issued March 18, 2026. E.O. 14394 directs federal agencies, including the EPA and the US Army Corps of Engineers to “review and revise requirements related to stormwater, wetlands, lakes, rivers and other bodies of water to reduce housing construction and ownership costs” by “streamlined regulatory and agency decision-making.” E.O. 14394 also will result in “regulatory best practices for State and local governments to promote home construction and affordability including streamlining permitting processes for housing development.” Instead of streamlining the simple act of approving plans for sewer collection systems, the General Permit creates an entire new permitting regime that requires approval from and compliance with other state and federal agencies as a condition of coverage under the General Permit.

Response This general permit streamlines the permitting process. See above.

Comment 10 The Fact Sheet discusses a “Designated Project Review Program”, which appears to delegate DEQ’s permitting authority, in whole or in part, to other local agencies. No explanation of this process is included in the Fact Sheet and the General Permit does not specify how this process will work to obtain coverage under the General Permit, or whether this process will result in quicker, simpler and less costly approvals of plans for sewer collection systems.

Response A designated project review program means a permit program for which the technical review for the construction of sanitary sewer collection systems under this general permit is delegated to an approved entity. Permit ARCC00000, Fact Sheet, p. 1.

Permit ARCC00000 states that a complete NOI, permit fee, and all required information should be submitted at least forty-five (45) days prior to the date coverage is desired. Permit ARCC00000, Prerequisites, Condition 4.

Permit ARCC00000 states that, for designated project review program submissions, a complete NOI, permit fee, and all required information should be submitted least twenty (20) days prior to the date coverage is desired. Permit ARCC00000, Prerequisites, Condition 5.

Accordingly, Permit ARCC00000 indicates that a complete submission that comes through a designated project review program should be processed within twenty (20) days, which is less than the forty-five (45) days for other submissions.

Please note that incomplete submissions cannot be processed until the omissions or deficiencies are addressed and the submission becomes complete. Errors and inconsistencies discovered during the technical review process will also delay processing until those issues are resolved.

DEQ will develop and provide a submission packet for applicants to the designated reviewer program.

Comment 11 The General Permit does not contain an adequate explanation of the economic impact and environmental benefits of the Permit, including the economic impact on “those entities that may apply for coverage under the general permit” as required by Ark. Code Ann. §8-4-203(m)(3)(A). The Fact Sheet states only that the “permit fees for construction of sanitary sewer collection systems will be paid to the Division instead of the Dept. of Health.” However, the Fact Sheet also seems to specify that there will be an additional \$500 fee under DEQ rules. The Fact Sheet also lacks any analysis of whether the additional prerequisites and terms and conditions of the General Permit will result in any additional environmental benefit or result in any additional economic impact to housing developers.

Response Ark. Code Ann. § 8-4-203 states, “[t]he division may rely upon readily available information for its consideration of the economic impact and environmental benefit of the general permit and its terms and conditions.” Ark. Code Ann. § 8-4-203(m)(3)(D).

As stated above the environmental benefits are that properly designed collection systems and expansions of collection systems are necessary to protect the environment. If the collection systems are not adequate, raw wastewater could be discharged to waters of the state or in an area where it could come into contact with individuals. Contact with raw wastewater is a public health and environmental concern and should be avoided.

Permit ARCC00000 creates a streamlined single submission that will be reviewed concurrently by DEQ and ADH. Specifically, this permitting process will expand the use of concurrent reviews among agencies and is part of developing a “one-stop” online application portal for this process in accordance with the Arkansas Governor’s Executive Order 26-04.

The Fact Sheet for Permit ARCC00000 states:

The permit fees for construction of sanitary sewer collection systems will be paid to the Division instead of the Department of Health.

This statement makes it clear that the permit fee will replace the fee charged by the Department of Health.

Comment 12 There does not appear to be any evidence in the permitting record about any outreach to utilities, communities or developers about the economic impact of the General Permit nor about the permit in general, as required by Ark. Code Ann. §8-203(m) and Section 4 of the Arkansas Governor’s Executive Order 26-04.

Response Section 4 of the Arkansas Governor’s Executive Order 26-04 states: “Agencies shall engage with relevant stakeholders from the regulated community and industry to ensure permitting processes are informed by real-world experience and support economic growth.”

Ark. Code Ann. § 8-4-203(m)(3)(A)(i) states, “[b]efore the submittal to public comment of a general permit that has not been previously issued, the division shall consider the economic impact and environmental benefit of the general permit and its terms and conditions upon the people of the State of Arkansas, including those entities that may apply for coverage under the general permit.” Ark. Code Ann. § 8-4-203(m)(3)(D) states, “[t]he division may rely upon readily available information for its consideration of the economic impact and environmental benefit of the general permit and its terms and conditions.”

DEQ and ADH heard from multiple stakeholders that they wanted to clarify the review process and to eliminate any overlap between DEQ and ADH that was occurring. Those stakeholders requested a streamlined process so that a single submission would be reviewed concurrently by DEQ and ADH.

If you were not part of those discussions, please reach out to the Office of Water Quality and provide a name and contact number for your representative, and the Office of Water Quality will let you know the next time it meets with those stakeholders. In addition, some of the referenced discussions were facilitated by legislators. You should reach out to your representative and request that you be included in future discussions on this topic.

The economic impact is addressed in the Fact Sheet, which states, “permit fees for construction of sanitary sewer collection systems will be paid to the Division instead of the Dept. of Health.” In other words, DEQ’s permit fee will replace the fee charged by ADH for this review. Between that explanation and the concurrent review established in this permitting process, the net economic impact imposed by this permit should be positive. This permit does change which agency will receive the fee for reviewing sewer collection systems. It also creates a “one-stop” online application portal for this process, which is an economic benefit for the regulated community.

Comment 13 In summary, the Division should eliminate the permitting requirement for sewer collection systems (whether by individual permit or by general permit), in favor of

a simple submission, approval and inspection process for sanitary sewer collection systems plans and specifications. Alternatively, the General Permit should be drastically reduced and simplified to only address the process for submission and approval of sewer system plans and specifications.

Response General Permit ARCC00000 simplifies the review and approval process for sewer collection system plans. It creates a streamlined single submission that will be reviewed concurrently by DEQ and ADH and helps eliminate any overlap by DEQ and ADH that was occurring.

A complete submission for coverage under Permit ARCC00000 should demonstrate that (1) the collection system is designed in accordance with Ten States Standards, (2) the wastewater from the collection system will go to a permitted facility that has agreed to treat that wastewater, (3) that permitted facility has capacity to treat the incoming wastewater, and (4) the collection system for the permitted facility will be able to transport the incoming wastewater without any unpermitted discharges from the collection system before that wastewater can be fully treated the permitted facility. Each of these demonstrations are required to ensure that the collections system is designed to prevent raw wastewater from being discharged to waters of the state or being discharged to a location where individuals could come into contact with that raw wastewater before it can be properly treated.

Comment 14 DEQ recognizes that coverage under this general permit is not necessary for POTWs performing routine repair, maintenance, or replacement of the existing sanitary sewer collection system unless components will be added to the sanitary sewer collection system that were not already present, i.e. lift station, in-line storage, etc.

Response DEQ has included a statement that coverage under this general permit is not required for POTWs performing routine repair, maintenance, or replacement of existing sanitary sewer collection systems unless components will be added to the sanitary sewer collection system that are not already present.