

**RESPONSE TO COMMENTS
FINAL PERMITTING DECISION**

Permit No.: ARG640000
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The following are responses to comments received by the Division of Environmental Quality (DEQ) regarding the draft permit number referenced above and are developed in accordance with regulations promulgated at 40 C.F.R. § 124.17, 8 CAR pt. 11, and Arkansas Code Annotated § 8-4-203(e)(2).

Introduction

The above permit was published for public comment on October 19, 2025. The public comment period ended on November 18, 2025. This document contains a summary of the comments that DEQ received during the public comment period.

The following people or organizations sent comments to DEQ during the public comment period. A total of one (1) comment was raised by one (1) commenter.

Commenter	Number of Comments Raised
1. Beaver Water District	1

Comment 1 Draft Permit Section Part 3.5.9:

BWD understands from previous permit renewal cycles that permittees qualified for and operating consistent with the reduced monitoring frequencies under ARG640000 will continue to monitor at the existing monitoring frequency reductions when coverage is recertified under the renewed general permit, as long as there are no exceedances of the permit limits for the applicable parameter.

BWD currently has a Type 103 Outfall and monitors the outfall consistent with approved monitoring frequency reductions for Total Suspended Solids (TSS) and Total Residual Chlorine (TRC). The provisions of the draft renewal permit state the outfall will now be recategorized as a Type 105 Outfall, which significantly increase baseline and/or reduced sampling frequencies for TSS and TRC, as shown below:

Monitoring Frequency				
	Standard Under Existing Permit	Reduced Frequency Under Existing Permit	Standard Under Draft Permit	Reduced Frequency Under Draft Renewal Permit
	Outfall 103	Outfall 103	Outfall 105	Outfall 105
TSS	once/week	once/quarter	once/week	once/month
TRC	once/week	once/year	three/week	once/week

BWD requests clarification under the draft renewal permit Section 3.5.9 that BWD's reduced monitoring frequencies will remain the same as current under its approved monitoring frequency

reduction, namely: Annually for TRC, and Quarterly for TSS. BWD believes review of its historical DMR supports continuation of the existing reduced monitoring frequencies.

In the alternative, BWD requests DEQ reconsider the draft baseline and reduced sampling frequencies for new Outfall Type 105 to avoid immediate and significant increases in monitoring frequency, regulatory burden, and costs to public water treatment facilities like BWD that have a long-term history of compliance with DEQ's general permit requirements.

Response: Part 3.5.9 states, “The reduced monitoring frequency for a given parameter will continue through the term of this permit, as long as there are no exceedances of the permit limits for that parameter. A return to the baseline monitoring frequency for a parameter is required if a monitoring result is in exceedance of the limit. The permittee must then re-qualify for reduced monitoring frequency, in accordance with Parts 3.5.1–3.5.4 above. At the time of permit recertification, the permittee may request continuation of any existing monitoring frequency reductions or be given the opportunity to apply for them. DEQ will then review the permittee's request(s) in accordance with the process and conditions outlined in Part 3.5.”

For clarification, this means that any facility that has reduced monitoring frequencies for any given parameter may request to continue with the reduced monitoring during permit recertification if the facility has not exceeded monitoring limits. However, the reduced monitoring frequencies were revised based on the 2025 CPP that outlines the standard monitoring frequencies of a given parameter based on the daily average flowrate of the facility. The facility must comply with the revised reduced monitoring frequencies of once per month for TSS and once per week for TRC.