

# ADEQ

ARKANSAS  
Department of Environmental Quality

August 13, 2009

Mr. Bill Luthans, Acting Director  
Water Quality Protection Division, 6WQ  
United States Environmental Protection Agency, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

RE: EPA Proposed Illinois River Watershed Model, ADEQ Review

Dear Mr. Luthans:

The Department has completed the review of the Agency's draft project proposal document transmitted by email on August 4, 2009. We appreciate EPA's coordination with the Department in this preliminary phase of the project development and the commitment made to insure that the Department is actively involved in each step of the project. In this regard, we think it is important that adequate review time be included throughout the study. Accordingly, the Department would like to coordinate with EPA on a proposed timeline for the project, including the dates for any expected milestones, review periods, and project completion.

In addition to these general comments, the Department has the following preliminary comments on the referenced sections.

## **Project Tasks**

### **Completion of a Quality Assurance Project Plan (QAPP)**

1. In an effort to fully collaborate with EPA during this project the Department would like to review and provide detailed comments on any proposed QAPP and all steps involved in the development of the model and requests that adequate time be incorporated into the schedule to complete the review.
2. EPA states "This project will not include new data collection". The Department believes that the inclusion of additional data is critical considering that this is an ever changing area with some lower TP limits already having been imposed. New data collection is important given that the intent of the model is to be a tool upon which sound technical decisions can be made in the future.

### **Data Compilation and Assessment**

3. The scope of work states that "the contractor shall compile existing data". The Department feels that it is important to reach a mutual understanding and agreement early in the process as to "existing data" that will be used by the contractor.

4. The Department suggests we discuss with EPA and reach a common understanding of the definition of “non-point source contributions” as it relates to the proposed model.

#### **Water Quality Model Development**

5. The Department feels it is important that we reach a determination and agreement early in the process on which “calibrated water quality model” will be used.

6. The Department feels it is important that we reach a determination and agreement on the exact meaning of the term “seasonality (e.g. high flow verse low flow)” in the context of the model including if wet season storm event flows will be considered.

7. The Department thinks it is important that the selected model(s) evaluate the relationships with other in-stream physical-chemical parameters influencing Total Phosphorous concentrations, e.g. DO and habitat characteristics.

We look forward to working with EPA in the development of this project. If you have any questions concerning this matter, please feel free to call me at (501) 682-0655, or E-mail at [drown@adeq.state.ar.us](mailto:drown@adeq.state.ar.us), or you may contact Mo Shafii at (501) 682-0616, or by E-mail at [shafii@adeq.state.ar.us](mailto:shafii@adeq.state.ar.us).

Respectfully submitted,



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Chief, Water Division

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