

# DELTIC TIMBER CORPORATION

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October 1, 2013

Ms. Loretta Reiber, P.E.  
Staff Engineer  
Discharge Permits Branch, Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317  
[reiber@adeq.state.ar.us](mailto:reiber@adeq.state.ar.us)

Re: Deltic Timber Corporation  
Draft NPDES Permit Comments – NPDES Permit No. AR0048640 – AFIN 75-00009

Dear Ms. Reiber:

Deltic Timber has reviewed the above referenced draft NPDES permit and offers the following comments.

**1. *Page 1 of Part IA - Sample Type for Debris.***

The sampling type for Debris in the previous permit was “visual”. The sample type for Debris in the draft permit has been changed to “grab”. No. 14 of the Statement of Basis states the requirements for the sample type and frequency were based on the current discharge permit. We request that the sample frequency for debris be changed back to the original type listed in the current permit.

**2. *Page 9 of Statement of Basis – Sample Type and Frequency.***

No. 14 of the Statement of Basis states that the sample frequency for Debris is once/month and is twice/week for Oil and Grease in both the previous and draft permits. It appears that the sample frequency for these two parameters were mistakenly switched. In Part IA and the current permit, the sample frequency for Debris and Oil & Grease is listed as twice/week and once/month, respectively.

We greatly appreciate the opportunity to present these comments and look forward to the resolution of these issues. If you have any questions or wish to further discuss these issues please do not hesitate to contact me at (870) 881-6425.

Respectfully Submitted,  
Deltic Timber Corporation



Jim Phillips  
Manager, Corporate Safety, Environment, & Insurance

cc: Brett Bray,           Ola  
    Kent Streeter       El Dorado  
    Russell McLaren,   GBM<sup>c</sup> & Associates