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Short Term Activity Authorizations (STAA): Lazendra L. Harston (Arkansas Department of Environmental Quality) Arkansas Water Works & Water Environment Association Presentation

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Ms. Lazendra L. Harston undertook a presentation at the Arkansas Water Works & Water Environment Association conference titled Short Term Activity Authorizations (STAA) ("Presentation").

Ms. Harston is an ecologist in the Arkansas Department of Environmental Quality ("ADEQ") Office of Water Quality.

The focus of her presentation was Short Term Activity Authorizations ("STAA").

Arkansas Pollution Control & Ecology Commission Regulation No. 2 provides for STAAs which allow applicants (under certain circumstances) to:

... exceed the water quality standards (mainly due to turbidity) for work that involves in-stream activities. (Cite is from Ms. Harston's presentation)

Besides defining STAAs, the discussion addressed the length of time permitted for such work (up to six months) and noted an authorization must be obtained prior to the initiation of in-stream activities (unless it is an emergency situation).

The discussion also addressed various in-stream activities that have the potential to exceed water quality standards such as:

- Gravel removal
- Bank stabilization
- Culvert replacement
- Flood control projects
- Entry of machinery
- Bridge construction, demolition, crossings, repairs or maintenance
- Activities conducted in any water that might cause a violation of the Arkansas water quality standards

Other activities that might also be covered by an STAA were stated to be those essential to the protection or promotion of the public interest and that result in no permanent or long-term impairment of beneficial uses of the water such as:

- Wastewater treatment facility maintenance
- Fish eradication projects
- Mosquito abatement projects
- Algae and weed control projects
- Dredge and fill projects
- Construction activities
- Debris removal
- Activities that maintain or enhance beneficial uses

The presentation provided recommendations for in-stream activities and visual images of “what not to do”.

A detailed discussion of the process for obtaining an STAA, including situations involving emergencies, was undertaken.

The role of the United States Army Corps of Engineers and the Section 401 Clean Water Act Water Quality Certification process were also addressed. The discussion of the United States Army Corps of Engineers included potential applicability of Clean Water Act nationwide permits and required public notices.

[A copy of the presentation can be downloaded here.](#)