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From: David Gruenwald [mailto:dgruene@swbell.net]

Sent: Wednesday, May 08, 2013 12:41 PM

To: Reg-Comment

Subject: Triennial Review/Regulation 2

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I briefly followed the Stakeholder's meetings while the Triennial Review was in process and wish to make a few comments.

Critical Flow, I understand that the 4 cfs was removed several reasons, in part because of the new state law, Act 954.

It seems that the Harmonic mean flow is a better way to define critical flow in large streams with greater flow than 4 cvs, but small streams are still a problem since there is apparently no suitable way to remove total dissolved minerals and many small water treatment facilities cannot meet the current standards.

Endangered species - If the changes to Regulation 2 indeed provide a way to identify and add new or unlisted species of concern, then I agree with the changes.

Minerals - The current standards of 250 ppm Phosphorus, 250 ppm for Chlorides and 500 ppm for total dissolved solids are recognized as difficult or economically impossible for small water treatment facilities to achieve. I have been advised that these standards are not harmful to aquatic communities since they adjust slowly over time to these levels of minerals. Would it not be possible to create new standards that are slightly higher to accommodate water utilities and allow them to be in compliance without doing a use attainability analysis ecoregion by ecoregion. A level should be set that accomplishes this without endangering aquatic biota. There would likely be some environmental impact but aquatic life does adjust in time to small changes.

Other issues - I see no immediate concern with other proposed changes to Regulation 2. I fully understand that Act 954 may change many issues in the Regulation (2). It is apparently unknown at this time what EPA may decide and how the Clean Water Act may come into play.

Thank you for the opportunity to comment.

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