



Owned by the Citizens of Jonesboro

May 6, 2013

Doug Szenher
Public Outreach and Assistance Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Commission Regulation 2 (Arkansas Water Quality Standards) Comments
City Water and Light Plant of the City of Jonesboro

Dear Mr. Szenher:

The purpose of this letter is to provide comments on Arkansas Department of Environmental Quality's (ADEQ's) proposed changes to Commission Regulation 2 (Arkansas Water Quality Standards). City Water and Light Plant of the City of Jonesboro (CWL) appreciates the opportunity to provide comments and the efforts by ADEQ to promote participation in the process.

CWL would like to respectfully submit the following comments for ADEQ consideration:

1. Table 2.511(A)(1) includes a proposed addition for "Big Creek Ditch to Bayou DeView" with criteria of 20 mg/L chloride, 30 mg/L sulfate, and 270 mg/L TDS. According to recent informal communication between ADEQ Water Quality Planning Branch and FTN Associates, ADEQ intended this entry in the table to represent only the portion of Big Creek Ditch upstream of the unnamed tributary into which CWL discharges. This portion of Big Creek Ditch was not addressed by CWL's Use Attainability Analysis and third party rulemaking. It is FTN's understanding that the criteria of 20 mg/L chloride, 30 mg/L sulfate, and 270 mg/L TDS have never been applied to this portion of Big Creek Ditch either in Regulation No. 2 or in ADEQ's biennial assessments; therefore, site specific criteria should not be applied to this portion of Big Creek Ditch. We respectfully request that ADEQ remove the proposed addition to Table 2.511(A)(1) for "Big Creek Ditch to Bayou DeView".

If ADEQ disagrees with our request to remove "Big Creek Ditch to Bayou DeView" and the accompanying criteria from Table 2.511(A)(1), we request that ADEQ change "Big Creek Ditch to Bayou DeView" to a more specific description such as "Big Creek Ditch upstream of CWL discharge tributary". This change would clarify that ADEQ is applying these criteria only to the portion of Big Creek Ditch that was not addressed by CWL's Use Attainability Analysis.

2. On Plate D-1 in Appendix A, the boxes with the numbers 38, 39, and 40 were not carried forward from the current version of Regulation No. 2. These boxes show approximate

Ronald L. Bowen, MANAGER

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locations where site specific criteria for Big Creek Ditch and Bayou DeView apply. We request that these three boxes be added to Plate D-1 as they are shown in the current version of Regulation No. 2.

3. In the list of Site Specific Standards Variations Supported by UAA in the Delta Ecoregion (Appendix A), "TDS" was mistakenly spelled out as "total dissolved oxygen" rather than "total dissolved solids" for the Unnamed Tributary to Big Creek Ditch, Bayou DeView from AR Hwy 14 to Whistle Ditch, Bayou DeView from mouth to AR Hwy 14, and two other stream reaches.

We greatly appreciate the opportunity to submit these comments and thank ADEQ for their consideration of these issues. If you have any questions or more information is required, please contact my office at (870) 930-3310.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jake Rice, III', with a stylized flourish at the end.

Jake Rice, III, P.E.
Assistant Manager
Jonesboro City Water & Light Plant