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Written Comment
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Hearing Location JASPER

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Director Keogh

This proposed modification as stated in ADEQ's March 23rd news release reads as follows and I quote:

"This involves modifying the Nutrient Management Plan to allow land application of wastewater from Waste Storage Pond 2 via tanker wagon."

Now... When I look at the latest Nutrient Management plan, Section M shows both ponds 1 and 2 with a land application method of Tank Wagon, and this aligns with what is stated in the news release. However.. when I read section A of this same plan, it reads as follows:

Effluent from Waste Storage Pond 1 will be applied through a Vac Tanker, whereas the effluent from Waste Storage Pond 2 will be applied through a traveling gun and a permanent pipeline.

So... Section A does not say anything about a vac tanker for pond 2. The information regarding Pond 2 in sections A and M of this plan DO NOT AGREE. Section A and the content of your news release DO NOT AGREE. This indicates to me that this Nutrient Management Plan is not clear, not consistent, and not complete.

Mr. Benefield

Director; clarity, consistency, and completeness have been ongoing complaints, regarding this permit, from the start. Such complaints have been called out repeatedly by: the public... the press... and the courts. Perhaps your staff think this permit is well written, but no one else does. Director; Can we not make a fresh start in regard to the accuracy of the information that is inserted into this document? Based on how ADEQ has handled previous inconsistencies, I would respectfully request that you follow your own precedents and return the Notice of Intent to the applicant, have him correct it, resubmit it, and then reschedule this hearing for public input at a later date.