



Arkansas Red River Commission

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February 18, 2015

Arkansas Department of Environmental Quality
Public Outreach and Assistance Division
Attn: Mr. Doug Szenher
5301 Northshore Drive
North Little Rock, AR 72118

RE: Domtar A.W. LLC, Public Hearing, to Change APC&EC Regulation 2, Arkansas Water Quality Standards

Dear Mr. Szenher:

The Arkansas Red River Commission (ARRC) is submitting comments to the referenced public meeting held in Ashdown, Arkansas, on January 26, 2015. The permit proposes to change the APC&EC Regulation 2, the Arkansas Water Quality Standards, through a technical adjustment, for the Red River from the Arkansas-Oklahoma state line to the Arkansas-Louisiana state line.

The ARRC understands that Domtar is required to renew its permit for water discharge and is not requesting a change to the actual emissions from their plant. This Commission does not object to Domtar's request for discharge, since there would be no change to existing river quality.

The issue is the Arkansas State standards for the stretch of Red River from the confluence of Little River and the Louisiana State line. We understand that the existing standards for the stretches above and below this section of river are higher. Due to the natural Chlorides, Sulfates and minerals the existing TDS of 500 mg/L cannot be met.

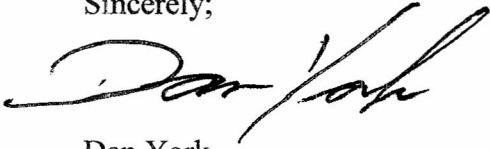
Our questions pertain to the proposed rule change to increase the allowed TDS in the Red River from the Oklahoma/Arkansas line to the Arkansas/Louisiana line.

1. With the proposed rule changes to the water quality standards and the issuance of the Domtar permit, will there be any change to the water quality and total TDS levels currently existing in the Red River?
2. The proposed change to water quality standards will change the designation in the Little River to Louisiana line stretch from 'domestic water supply' to 'non-domestic water supply'. Is there another designation that can be used, such as 'supplemental water supply'? If not, what is the process to get such a designation approved and accepted by ADEQ?
3. Does the removal of the 'domestic water supply' designation on the Red River prevent or interfere with any future project that might involve use, sale or transfer of water from Red River in Arkansas to out of state or in state users?

4. Why is there such an inconsistent and conflicting set of mineral water quality standards for the Red River within Arkansas? (The stretch from the Oklahoma line to Little River and from Little River to the Louisiana line?)

Thank you for the opportunity to submit comments and we look forward to your responses.

Sincerely;

A handwritten signature in black ink, appearing to read "Dan York", with a stylized flourish at the end.

Dan York
Chairman