

From: Carol Bitting [mailto:lcbitting@gmail.com]
Sent: Tuesday, October 20, 2015 10:03 AM
To: Reg-Comment
Subject: City of Harrison amendment to Reg. 2

Director Keogh and Commissioners

The cities of Harrison and Yellville both rely on tourism dollars for a percentage of support. (see Arkansas Tourism Visitor Center north on Hwy 65) The quality of the air and water are important to visitors and their recommendations to new and returning visitors, not to mention the health of Arkansas residents.

I recently took a walk around the lake in Harrison, Ar. I would have liked to have spent more time and canoed Crooked Creek on down to Yellville and beyond to get a visual of the water quality of this stream. I was recently told by a friend of mine it had given him the best fishing trip of his life.

Walking along the lake trail I sensed the air for odors (recently Harrison friends had told me the smell of hogs prevailed throughout the whole city). The water continued to draw my attention gently flowing and glistening between the banks. Teenage boys were catching fish, the kids on the playground are our future, are those ducks and geese receiving the right nutrition in these waters, what are the attractions that I am enjoying that would make me want to come again?

The air was actually clear this day, the sky had blue to it and the only noticeable odor was when I circled to the northwest side of the creek and approached the concrete drainage inlets. Here a rank odor emerged. Runners and walkers passed me by as I took photos of the algae and its noticeable entrance to the stream from the city. The algae was floating on the surface and increased growth was noticed below the water's surface.

Going back in time a few years here is some of my experience in the Harrison area.

In the past Harrison has had to churn the lake to reduce algae and hire someone to pick up the trash.

The stream is located near the Jr High School and the football field is located along the stream edge (pollution contributor due to need to grow a perfect grass and sits right over a spring that emerges along Crooked Creek just north of the field).

When I first moved to this community I was appalled at the people, students etc who walked past trash cans and threw their trash on the ground. At football games I was overwhelmed and embarrassed with the lack of respect due to lack of education by this community, people just throwing trash on the ground bypassing trash receptacles. The evenings brought mountains of trash as local youth congregated near the stream and Sonic cups, McDonald bags, etc. are blown into the stream. I had never witnessed this abuse anywhere before. I spoke with someone hired to clean the football stadium, this was an ongoing year after year abuse. The same with the city hired lake personnel. I lived in this community for 8 years, walked the lake daily, it didn't change.

You think, trash is not the question here...you are right, but it is about education and the educated "can make necessary changes".

Today the city wants to change the stream permit requirements so it can come into compliance with permit regulations. Do we really want to change stream quality to make a sewer treatment plant comply? Why not fix the problem? The chlorides and sulfate are high elements in bleach, soaps and laundry detergents....correct? Why not appeal to the people first and ask them to reduce before we change standards? Has this been tried? I know when I speak with people about this no one has any idea and no one wants the quality standards for Crooked Creek reduced. Wal Mart has expressed going more "green". Wal Mart is a major contributor to the elements of stream degradation by the products they sell. Why not approach Wal-Mart, Home Depot, Miller's, Hudson's etc and inform them of the problem, let them re-organize the products they sell for the needs of the community?

Recently the NPS asked for 3 streams to be added to the 303-D list in a letter sent to ADEQ. The streams are Mill Creek (runs thru Dogpatch community), Big Creek (runs thru Mt. Judea) and Bear Creek (near Snowball). This is a serious issue. These streams are adding large amounts of degradation to the Buffalo River. Crooked Creek enters the White River a major trout fishing stream in Arkansas. Should we reduce the quality standards of these streams so that the Buffalo River is degraded and these streams are in compliance? Do we want to loose the Buffalo River's water quality?

There is allot to be added to education in Arkansas. It is time to require Arkansas students to have an environmental course designed to protect our future. This course could bring awareness to the cost of the "cleanup". We require hunters to take an education course and get a license. Why not allow state drivers to take a basic environmental course to get their license? It could be done at the time of renewal and take only a few minutes as they wait holding their "number".

#1. I suggest that no modifications be made to the water quality requirements or regulations and that the treatment plants of these two cities install the equipment designed and needed to increase water quality not degrade it. Round down.

#2. There is industrial growth such as chicken, turkey houses located south of Harrison that could be contributing to the degradation of this stream. It might be important to note that fertilization and water degradation should be paid for by the source. This is ADEQ's job to find the source and enforce actions to correct it. We as citizens pay for ADEQ to protect our environment and we would like to see it upheld to the highest standards. Revalent stream data....humm, such as Mill Creek which runs south of Crooked Creek into the Buffalo River, note would ADEQ be planning to degrade the quality of this stream's criteria for compliance? This stream is highly degraded and as today my letters of complaints to ADEQ have not shown any action.

This raises many many questions and will allow for degradation throughout the state, we are already losing the battle to larger industrial business' who take the money from locals and turn

our downtown shopping into mass Chinese merchandised items or second hand thrift stores where local people try to compete for a living.

Sincerely,
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The City of Harrison is requesting the following amendment to Regulation 2:

Modification of the chloride, sulfate and total dissolved solids (TDS) water quality criteria for Crooked Creek from the outfall of the Harrison WWTP to ADEQ monitoring station WHI0193 as follows: Chloride from 20 milligrams per liter (mg/L) to 22.6 mg/L; sulfate from 20 mg/L to 24.4 mg/L; TDS from 200 mg/L to 269 mg/L.

The City of Yellville is requesting the following amendment to Regulation No. 2:

Modification of the TDS water quality criterion for Crooked Creek from ADEQ monitoring station WHI0193 to the mouth of Crooked Creek as follows: TDS from 200 mg/L to 238 mg/L.

In addition to the changes requested in the Third Party Petition, the Commission invites the Public to comment on two questions:

1. Whether the proposed new criteria should be rounded up to the nearest whole number for Chloride and Sulfate and up to the nearest multiple of ten for Total Dissolved Solids.

The Commission is interested in this idea to avoid giving the public a misleading perception of accuracy and to seek input on what levels of numerical precision constitutes environmentally significant revision to the rulemaking.

2. Whether the proposed new criteria should be revised to correspond to the 99th percentile of relevant **instream** data.

The Commission seeks input on this issue in order to consider what values reflect actual **instream** concentrations and the frequency with which those values can be met.