

Robinson, Kelly

Subject: FW: Questions

From: cathy klein [<mailto:cathyklein@ymail.com>]

Sent: Tuesday, April 03, 2018 2:30 PM

To: Robinson, Kelly

Subject: RE: Questions

This is for public comment on Reg 37:

Why are BMPs already in use and paid for by the Beaver Watershed Alliance and Beaver Water District, along with other Water Districts allowed to be sold as credits to point source users?

Why isn't there a TMDL set for the upper Beaver Lake watershed. How does ADEQ determine the limits of pollutants and nutrients the lake can handle? Beaver Lake is already listed on the impaired water list 303d

How will nutrient credits be measured, where, and by who. How will these results be posted for public review? How will higher discharges be measured, where and by who?

Is there a Watershed Protection Fee being added to point source dischargers? Who will clean up our lake when it is proven that this isn't a good idea?

Nutrient Trading is a new concept and is unproven in AR. Why isn't ADEQ allowed to monitor non point source credits and verify claims (section 3c of Reg 37)

Why are Fayetteville and Huntsville Waste Water plants not just upgrading their systems, instead of looking for creative ways to sidestep the issue? This just takes their "cost of upgrade" and spreads it to the rest of the users of the lake.

Drinking water treatment plants will be left with no alternative but to raise the cost of drinking water to offset additional chemicals needed to treat the water. Why does ADEQ & ARPEC reason that it is OK to double the amount of chloride, sulfates, and TSS disposed into the lake, remove "designated drinking water supply" from the tributary they discharge into, and purchase credits that can not be verified or validated to cover up their over the discharge permit limits?

Discuss all alternatives that were considered prior to proposal of Reg 37. Why isn't AR Dept of Health and AR Game & Fish involved in the financial impact statement? How is drinking water considered in the overall strategy and implementation of Reg 37?

Beaver Lake is the drinking water source for 1 in 7 Arkansans! We need our ADEQ to protect our water quality and this should be the primary goal of all involved in Reg 37!

Thank you,
Cathy Klein

On Sat, Mar 31, 2018 at 8:24 AM, cathy klein
<cathyklein@ymail.com> wrote:

What is the TMDL for the upper Beaver Lake?

Thank you,
Cathy Klein

On Thu, Mar 29, 2018 at 1:05 PM, Robinson, Kelly
<ROBINSON@adeq.state.ar.us> wrote:

What are your questions, Ms. Klein?