

Robinson, Kelly

From: dane schumacher <dane.schumacher@yahoo.com>
Sent: Tuesday, May 01, 2018 9:18 AM
To: Reg-Comment
Cc: Robinson, Kelly
Subject: Comment re Proposed Changes to Regulation #37 (Docket No. 18-001-R)

To Whom It May Concern:

My comment as follows is in regard to the proposed changes re Regulation #37:

Regulation 37 as drafted is in need of more substantive and technical input with regard to nutrient trading and its *actual* effect, i.e., measurable indicators, that will be protective of AR water quality. Information in this regard is severely lacking. Further, the regulation as drafted fails to incorporate language with regard to ADEQ's enforcement standards as set forth in the NPDES program delegated to ADEQ by the U.S. EPA.