

Dear Mr. Szenher:

Following are public comments that FTN Associates, Ltd. (FTN) is hereby submitting concerning ADEQ's proposed changes to Regulation No. 2:

1. Table 2.511(A)(1) includes a proposed addition for "Big Creek Ditch to Bayou DeView" with criteria of 20 mg/L chloride, 30 mg/L sulfate, and 270 mg/L TDS. According to recent informal communication between ADEQ Water Quality Planning Branch and FTN, ADEQ intended this entry in the table to represent only the portion of Big Creek Ditch upstream of the unnamed tributary into which Jonesboro City Water & Light (CWL) discharges. This portion of Big Creek Ditch was not addressed by CWL's Use Attainability Analysis and third party rulemaking. It is FTN's understanding that the criteria of 20 mg/L chloride, 30 mg/L sulfate, and 270 mg/L TDS have never been applied to this portion of Big Creek Ditch either in Regulation No. 2 or in ADEQ's biennial assessments; therefore, these site specific criteria should not be applied to this portion of Big Creek Ditch. We respectfully request that ADEQ remove the proposed addition to Table 2.511(A)(1) for "Big Creek Ditch to Bayou DeView".

If ADEQ disagrees with our request to remove "Big Creek Ditch to Bayou DeView" and the accompanying criteria from Table 2.511(A)(1), we request that ADEQ change "Big Creek Ditch to Bayou DeView" to a more specific description such as "Big Creek Ditch upstream of CWL discharge tributary". This change would clarify that ADEQ is applying these criteria only to the portion of Big Creek Ditch that was not addressed by CWL's Use Attainability Analysis.

2. In Table 2.511(A)(2), certain criteria are marked with either a single asterisk or double asterisk. Do the single asterisk and double asterisk have the same meanings as in the current version of Regulation No. 2.511? The explanations of the single asterisk and double asterisk have been stricken in the redline version.
3. On Plate OM-2 in Appendix A, the boxes with the numbers 6 and 7 were not carried forward from the current version of Regulation No. 2. These boxes show approximate locations where site specific criteria apply for two reaches of Wilson Creek. We request that these two boxes be added to Plate OM-2 as they are shown in the current version of Regulation No. 2.
4. In the list of Site Specific Standards Variations in the Gulf Coastal Ecoregion (Appendix A), the existing entry for "Boggy Creek from the discharge from Clean Harbors El Dorado LCC downstream to the confluence of Bayou de Loutre" does not include a reference to a number on a map. We request that "(GC-2, #51)" be appended to this entry for clarification purposes.
5. On Plate GC-4 in Appendix A, the boxes with the numbers 52, 53, and 54 were not carried forward from the current version of Regulation No. 2. These boxes show

approximate locations where site specific criteria apply for McGeorge Creek, Willow Springs Branch, and Little Fourche Creek. We request that these three boxes be added to Plate GC-4 as they are shown in the current version of Regulation No. 2.

6. In the list of Site Specific Standards Variations in the Delta Ecoregion (Appendix A), "TDS" was mistakenly spelled out as "total dissolved oxygen" rather than "total dissolved solids" for five stream reaches.
7. On Plate D-1 in Appendix A, the boxes with the numbers 38, 39, and 40 were not carried forward from the current version of Regulation No. 2. These boxes show approximate locations where site specific criteria for Big Creek Ditch and Bayou DeView apply. We request that these three boxes be added to Plate D-1 as they are shown in the current version of Regulation No. 2.

Thank you for the opportunity to submit comments on the proposed changes to Regulation No. 2. If anything is unclear about these comments or if additional information is needed from FTN, please contact Philip Massirer or Jim Malcolm at 501-225-7779 or by e-mail (pjm@ftn-assoc.com or jtm@ftn-assoc.com).

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