

From: [Chuck Bitting](#)
To: [Public Comment](#)
Subject: Regulation 2 comments
Date: Tuesday, September 8, 2020 2:41:36 PM

Dear Director Keogh,

I appreciate the offer to send in these comments.

Title should remove "surface" as it is not consistent with Arkansas law.

I support the comments submitted by EPA.

2.102: remove "surface" as that is not protective of all waters of the State.

2.106 impairment definition does not consider a lowering of water quality, cultural, or societal conditions of Tier 3 streams.

2.106 water bodies, waterways, waters fails to consider all waters of the State.

2.302 ORW streams may also have high cultural and societal values not captured by water quality parameters. This should be clarified. (2.302 C)

2.309 the maximum length of a temporary variance should be stated.

2.401 remove " surface".

2.408 define "of a persistent nature" in terms of days, weeks, or months, and whether this is a one-time event or repeating event.

2.507 remove fecal coliform

Sincerely,

Chuck Bitting