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Sent: Tuesday, August 29, 2017 7:20 AM
To: Paes, Wanda
Cc: Ridley, Joshua
Subject: FW: Arkansas Regulation 12 Draft

We have reviewed your regs and do have a couple questions:

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- 1) What are the implementation dates for your rules?
 - 2) ADEQ IBR which takes in all of the federal dates but many of these will be before the effective date of the rule. How will ADEQ deal with implementation dates of different issues?
 - 3) We find it confusion as to what Reg **12.104** means if there are not specified implementation dates for specific requirements: 12.104 ".....and provided that the effective date of the provisions adopted herein by reference as provisions of this Regulation shall be the date such the provisions are specified as being effective by the Commission in its rulemaking and the effective date of the federal regulations adopted herein shall have no bearing on the effective date of any provisions of this Regulation:.."

Your assistance to clarify these issues are greatly appreciated.

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