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November 21, 2014

Mr. Doug Szenher  
Public Outreach and Assistance Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

Re: APC&EC Docket #14-007-R, SWEPCO 3<sup>rd</sup> Party Request to Amend Reg 2

Dear Mr. Szenher,

The following comments are submitted on behalf of International Paper (hereinafter "IP"). IP is an international manufacturer and supplier of paper and packaging materials, with operations in North America, Europe, Latin America, Asia and North Africa, including facilities in Arkansas. As indicated in the public notice published by ADEQ on October 1, 2014, comments and/or questions to the draft general permit are to be received by ADEQ not later than 4:30 p.m. on December 3, 2014.

**Comment 1-** IP has reviewed the Use Attainability Analysis submitted by SWEPCO in support of the proposed rulemaking (UAA) for dissolved minerals in the Little and Red Rivers, and found that the UAA includes references to IP's pulp and paper manufacturing operation in Texarkana, Texas that are inaccurate, in particular with respect to the manner in which the UAA characterizes IP's wastewater discharge and its effect on dissolved minerals in the Sulphur River at its confluence with the Red River. After discussing the inaccuracies with SWEPCO's UAA consultants, FTN Associates, SWEPCO agreed to change the UAA, and has provided IP with the appropriate UAA changes, which are attached hereto and are acceptable to IP. These changes clarify that the Sulphur River will comply with the applicable surface water quality standards for dissolved minerals at its confluence with the Red River. IP cannot support, and must oppose this rulemaking unless the agreed upon changes, attached hereto, are made to the UAA.

Sincerely,  
CHISENHALL, NESTRUD & JULIAN, P.A.



Charles R. Nestrud by Malcolm Means