



ARKANSAS
Department of Environmental Quality

July 2, 2009

Mr. Greg Withrow, General Manager
El Dorado Chemical Company, Inc.
P.O. Box 231
El Dorado, AR 71731

RE: Compliance Inspection

AFIN: 70-00040

NPDES Permit No.: AR0000752

Dear Mr. Withrow:

On 5/13/2009, Patricia Willis, EPA Region 6 Inspector, and I performed a routine compliance inspection of the El Dorado Chemical Company, Inc. facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. The facility did not have adequate documentation for grab sample time and analysis for pH for Outfalls 002, 003, 006, and 007 and dissolved oxygen for Outfall 001. Therefore, sample holding times cannot be justified.
2. The facility did not have dissolved oxygen meter calibration records at the time of the inspection.
3. The facility's pH meter calibration for Outfall 001 has been being bracketed with 4.0 and 7.0 buffer; however, the pH is almost always over 7.0, therefore the calibration should be bracketed with 7.0-10.0 buffers or use a three point calibration.
4. The bar screen at the domestic wastewater plant was not constructed properly. The bars are spaced too far apart.
5. The facility had one aerator out of service in "Lake Killdeer". This aerator will need to be repaired.
6. The Nitrate-Nitrogen samples taken on 3/16/009 and 3/26/2009 for Outfall 001 exceeded the allowable holding time and maximum holding temperature.
7. The staff gauge at Outfall 001 was not installed flat against the Parshall flume.

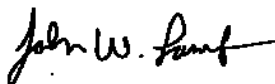
8. The flow meter at Outfall 001 had an error of 11.4%.
9. Proper operation and maintenance of the flow meter at Outfall 001 is not occurring. Monthly flow checks, to ensure accuracy with 10%, are not being performed.
10. The flow entering the Parshall flume at Outfall 001 was not entering straight into the flume. This was causing an eddy against the right wall of the flume and backwash on the left wall. The effluent must curve around to the right to enter the flume. The backwash causes excessive flow turbulence through the flume.
11. Housekeeping at the railroad contractors lay down yard needs to be improvement.
12. The annual comprehensive site compliance evaluation for 2008 was signed by Mr. David Sartain; however, the signatory authorized in the Storm Water Pollution Prevention Plan is the General Manager, not the Environmental Coordinator.
13. Outfalls 002, 006, and 007 only have an estimated flow measurement required so there is currently no way to flow weight these samples. The Permit requires the 24 hour composite samples to be flow weighted.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Technical Assistance Manager, of the Water Division Enforcement Branch of this Department. This response should be mailed to the address below. This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response with all necessary detailed documentation (i.e. pictures) is due by July 14, 2009.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,



John W. Lamb
District 8 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type																			
1 N 2 5 3 A R 0 0 0 0 7 5 2 11 12 0 9 0 5 1 3 17 18 O 19 S 20 2	Remarks																							
Inspection Work Days		Facility Evaluation Rating		BI		QA		Reserved																
67			69	70	1	71	N	72	N	73		74		75		76		77		78		79		80

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) El Dorado Chemical Company, Inc. 4500 Northwest Ave El Dorado, AR 71731	Entry Time/Date 9:07 /5/13/2009	Permit Effective Date 7/1/2002
	Exit Time/Date 15:35 /5/13/2009	Permit Expiration Date 6/30/2007
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Sartain/Environmental Coordinator/ 870-863-1484/870-863-1499 Brent Parker/Environmental Coordinator/870-863-1347	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Greg Withrow, General Manager 870-863-1400 El Dorado Chemical Company, Inc. P.O. Box 231 El Dorado,, AR 71731	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	U	Flow Measurement	U	Operations & Maintenance	U	Sampling
U	Records/Reports	U	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	U	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See Page 9 for Findings and Comments

Name(s) and Signature(s) of Inspector(s) John W. Lamb	Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality 3400 West. Hillsboro, El Dorado, AR 71730 870-862-0680/ Fax 870-862-3509	Date 28 May 2009
Patricia Willis	Unites States Environmental Protection Agency 1445 Ross Ave., Dallas TX 75202-2733 214-665-8356/Fax 214-665-7446	
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

S M U NA NEDETAILS: see page 9

- | | |
|--|--|
| 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ALL DISCHARGES ARE PERMITTED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT

S M U NA NEDETAILS: See page 9

- | | |
|--|---|
| 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. DATES AND TIME(S) OF SAMPLING: | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. EXACT LOCATION(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. NAME OF INDIVIDUAL PERFORMING SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| d. ANALYTICAL METHODS AND TECHNIQUES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| e. RESULTS OF CALIBRATIONS: | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| f. RESULTS OF ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| g. DATES AND TIMES OF ANALYSES: | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| h. NAME OF PERSON(S) PERFORMING ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

S M U NA NEDETAILS: see page 9

- | | |
|---|---|
| 1. TREATMENT UNITS PROPERLY OPERATED: | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. TREATMENT UNITS PROPERLY MAINTAINED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE: | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

S M U NA NEDETAILS: see page 9

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

S M U NA NEDETAILS: see page 9

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>001 parshall flume</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS

S M U NA NEDETAILS: see page 9

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>Arkansas Analytical, Inc.</u> <u>Bio-Analytical Labs</u>	
b. LAB ADDRESS: <u>11701 I-30, Bldg. 1, Suite 115</u> <u>3240 Spurgine Road</u> <u>Little Rock, AR 72209</u> <u>Doyline, LA 71023</u>	
c. PARAMETERS PERFORMED: <u>Ark Analytical-NH3-N, NO3-N, metals, sulfates, TDS, O&G, Fecal, CBOD, TSS; Bi o-Analytical- Bio-monitoring.</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY S M U NA NE

DETAILS: see page 9

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Slight	None	None	green	
003	None	None	None	Trace	None	colorless	
006	None	None	Trace	None	None	colorless	
007	None	None	Trace	yes	None	Lt. brown	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: S M U NA NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: S M U NA NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: Y N NA NE
2. TYPE OF SAMPLE: GRAB:___ COMPOSITE:___ METHOD:___ FREQUENCY:___
3. SAMPLES PRESERVED: Y N NA NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: Y N NA NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: Y N NA NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: Y N NA NE
7. SAMPLE SPLIT WITH PERMITTEE: Y N NA NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: Y N NA NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: Y N NA NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: see page 9

1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE: 2-22-2008 Y N NA NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: Y N NA NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: Y N NA NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: Y N NA NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: Y N NA NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: Y N NA NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: Y N NA NE
8. LIST OF STRUCTURAL BMPS: Y N NA NE
9. LIST OF NON-STRUCTURAL BMPS: Y N NA NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: Y N NA NE
11. INSPECTIONS CONDUCTED AS REQUIRED: Y N NA NE

FLOW CALCULATION SHEET

Date:	5/13/09	Time:	10:47		
Head in Inches:	12.25"	Feet:	1.02		
Type & Size of Primary Flow Measurement Device: 12" Parshall flume					
Name & Model of Secondary Flow Measurement Device:			Isco 4420 submerged		
Flow Meter					
Date of last Calibration of Secondary Flow Device: 1/22/2009					
Recorded Flow at Date & Time Listed Above:			2.36 mgd	(Facility Flow Meter)	
Calculated Flow at Date & Time Listed Above:			2.664		
(Flow is calculated using flow charts in: <u>ISCO Open Channel Flow Measurement Handbook-5th Edition</u>)					
% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				
% Error =	2.664	-	2.36	X 100	
	2.664				
% Error =	0.304	X 100			
	2.664				
% Error =	0.114	X 100			
% Error =	11.4	%			
Comments:	<u>Over 10 %, meter needs to be recalibrated, see page 9</u>				

DMR Calculation Check

Reporting Period: From 2009 March 01 To 2009 March 31
 Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass Daily Max. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Daily Max - mg/l
Reported Value:	<u>35.73</u>	<u>1.3</u>	<u>2.0</u>
Calculated Value:	<u>35.73</u>	<u>1.382</u>	<u>2.09</u>
Permit Value:	<u>811.84</u>	<u>12</u>	<u>18</u>

If calculated value does not equal reported value, explain:

Difference in rounding.

NPDES Compliance Inspection Report Further Explanation

Section A: The facility's permit expired June 30, 2007. The facility has submitted a permit application to the Permits Branch of the ADEQ Water Division.

Section B, items 2a & g: The facility needed better documentation of grab sample time and analysis time for pH for Outfalls 002, 003, 006, and 007. The facility needed better documentation of grab sample time and analysis time for dissolved oxygen for Outfall 001. Therefore, sample holding times cannot be justified.

Section B, item 3; Section F, item 3: The facility did not have any dissolved oxygen meter calibration records available at the time of the inspections. The facility's pH calibration of the continuous pH meter at Outfall 001 has been bracketed with 4.0 and 7.0 buffers, however, the pH at Outfall 001 is almost always above 7.0, therefore, the facility should either use a 7.0-10.00 bracket or a three point calibration.

Section C, item 1: The bar screen at the domestic wastewater treatment plant was not constructed correctly. The bars were spaced too far apart. See photo 12.

Section C, item 5: The facility had one aerator out of service in Lake Killdeer. The facility had two other aerators in service. See photos 1 & 2. This aerator should be repaired.

Section C, item 11: The facility had two unpermitted discharge from the 004 storm water containment system in August 2008. The containment system normally pumps back to the prill towers for make up water. The facility has built up the levee around the containment system so that the water during flash flood events will flow into the "day pond" and be discharged either out Outfall 001 or 002.

Section D, item 3: The facility does not flow weight 24 hour composites. However, Outfall 001 has a constant flow when discharging which is controlled by a manual valve and does not vary more than 10 % during a discharge day. Outfalls 002, 006, and 007 only have an estimated flow measurement required so there is no way to flow weight these samples. The Permit requires the 24 hour flow weighted samples to be flow weighted.

Section D, item 6c: The NO₃-N samples taken on 3/16/09 (Outfall 001) and 3/26/09 (Outfall 001) exceeding the allowable holding time of 48 hours. The allowable temperature storage of 6 degrees C was also exceeded for these sample dates. This was due to courier holding the samples too long in transit.

Section E, item 1: The staff gauge at the Outfall 001 Parshall flume was not installed flat against the flume. See photo 8.

Section E, item 3-6: The flow meter at Outfall 001 had an error of 11.4%. The last date of calibration was 1/22/09. The facility needs to recalibrate this meter and check it more often to insure it is measuring accurately.

Section E, item 7: At Outfall 001, the flow was not entering the Parshall flume straight. This was causing an eddy against the right wall of the flume and backwash on the left wall. The effluent must curve around to the right to enter the flume. The backwash causes excessive flow turbulence through the flume. See photos 4-7.

Section G: Outfall 007 contained a noticeable amount of foam. This foam did not persist to the fence line of the facility. See photos 9 & 10.

Section J: Housekeeping needs to be improved at the railroad contractors lay down yard. An uncovered grease bucket, was full of rainwater and overflowing onto the ground. See photo 11.

Section J, item 11: The annual comprehensive site compliance evaluation for 2008 was signed by Mr. David Sartain, Environmental Coordinator. The documented signatory authorized in the Storm Water Pollution Prevention Plan is the General Manager, not the Environmental Coordinator.

Water Division NPDES Photographic Evidence Sheet

Location:	El Dorado Chemical Company, Inc.						
------------------	----------------------------------	--	--	--	--	--	--

Photographer:	John W. Lamb			Witness:	Patricia Willis, EPA		
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Photo #	1	Of	12		Date:	5/13/09	Time:	10:26
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Description:	Aerator out of service in "Lake Killdeer"						
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Photographer:	John W. Lamb			Witness:	Patricia Willis, EPA		
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Photo #	2	Of	12		Date:	5/13/09	Time:	10:26
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Description:	Picture shows one aerator out of service, two other aerator in service						
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Water Division NPDES Photographic Evidence Sheet							
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Location:	El Dorado Chemical Company, Inc.						
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Photographer:	John W. Lamb	Witness:	Patricia Willis, EPA			
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Photo #	3	Of	12	Date:	5/13/09	Time:	10:36
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Description:	Outfall from Lake Lee						
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Photographer:	John W. Lamb	Witness:	Patricia Willis, EPA			
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Photo #	4	Of	12	Date:	5/13/09	Time:	10:58
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Description:	Outfall 001 flow channel at Parshall flume, flow not entering flume at a straight line						
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Water Division NPDES Photographic Evidence Sheet							
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Location:	El Dorado Chemical Company, Inc.						
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Photographer:	John W. Lamb	Witness:	Patricia Willis, EPA			
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Photo #	5	Of	12	Date:	5/13/09	Time:	11:03
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Description:	Parshall flume (outfall 001), flow has eddy effect to the left of photo above flume						
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Photographer:	John W. Lamb	Witness:	Patricia Willis, EPA			
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Photo #	6	Of	12	Date:	5/13/09	Time:	11:03
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Description:	As above						
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Water Division NPDES Photographic Evidence Sheet

Location:	El Dorado Chemical Company, Inc.						
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Photographer:	John W. Lamb	Witness:	Patricia Willis, EPA		
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Photo #	7	Of	12		Date:	5/13/09	Time:	11:04
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Description:	Flow turbulence through flume at Outfall 001							
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Photographer:	John W. Lamb	Witness:	Patricia Willis, EPA		
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Photo #	8	Of	12		Date:	5/13/09	Time:	11:08
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Description:	Staff gauge at Outfall 001 flume was not flush against the flume							
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Water Division NPDES Photographic Evidence Sheet

Location: El Dorado Chemical Company, Inc.

Photographer: John W. Lamb **Witness:** Patricia Willis, EPA

Photo # 9 **Of** 12 **Date:** 5/13/09 **Time:** 11:36

Description: Outfall 007, showing foam below outfall



Photographer: John W. Lamb **Witness:** Patricia Willis, EPA

Photo # 10 **Of** 12 **Date:** 5/13/09 **Time:** 11:37

Description: Fence below Outfall 007, showing that foam has not made it offsite.



Water Division NPDES Photographic Evidence Sheet

Location: El Dorado Chemical Company, Inc.

Photographer: John W. Lamb **Witness:** Patricia Willis, EPA

Photo # 11 **Of** 12 **Date:** 5/13/09 **Time:** 11:50

Description: House keeping issues near the railroad lay down yard.



Photographer: John W. Lamb **Witness:** Patricia Willis, EPA

Photo # 12 **Of** 12 **Date:** 5/13/09 **Time:** 12:30

Description: Bar screen at domestic wastewater plant, bars are not close enough together.





CHEMICAL COMPANY

July 13, 2009

ADEQ
Cindy Garner
Water Division
NPDES Enforcement Section
5301 North Shore Drive
North Little Rock, AR 72118-5317

Re: AFIN: 70-00040; NPDES Permit No.: AR0000752

Dear Ms. Garner:

On May 13, 2009, John Lamb, District Field Inspector, performed a routine compliance inspection of the El Dorado Chemical Company's (EDCC) wastewater treatment facility. Mr. Lamb listed thirteen findings from his inspection that required corrective action. Mr. Lamb's letter dated July 2, 2009, requested that EDCC give a written response to the findings including corrective actions by July 14, 2009. EDCC's responses are as follows:

1. *The facility did not have adequate documentation for grab sample time and analysis for pH for Outfalls 002, 003, 006, and 007 and dissolved oxygen for outfall 001. Therefore, sample holding times cannot be justified.*

Response: EDCC now has a policy (see Attachment 1) in place to record exact sample and calibration times for all parameters that are recorded.

2. *The facility did not have dissolved oxygen meter calibration records at the time of inspection.*

Response: Historically the dissolved oxygen meter calibration log was maintained in the EDCC Environmental Department as required. However, the log was not available for inspection during Mr. Lamb's site visit. In lieu of this, EDCC personnel will keep the dissolved oxygen calibration logs at the Outfall 001 building, where the dissolved oxygen meter is located.

3. *The facility's pH meter calibration for Outfall 001 has been being bracketed with 4.0 and 7.0 buffer; however, the pH is almost always over 7.0, therefore the*

calibration should be bracketed with 7.0-10.0 buffers or use a three point calibration.

Response: EDCC instrumentation technicians have started to perform a three point calibration on the pH meter at Outfall 001. The technicians now use a 4.0, 7.0 and 10.0 buffer to calibrate the instrument two times per week. (See Attachment 2)

4. *The bar screen at the domestic wastewater plant was not constructed properly. The bars are spaced too far apart.*

Response: Outfall 003 receives treated sanitary waste effluent. The sanitary waste is treated using an Imhoff treatment system followed by filter beds. The Imhoff system is meant to separate and capture the solids associated with the sanitary waste. The bar screen is only meant to capture larger solids. The treatment system appears to be functioning properly as demonstrated by the fact that we consistently discharge within our required permit limits. The NPDES permit states that there will be no discharge of distinctly visible solids, scum or foam of a persistent nature. We are unaware of any sizing requirements for the bar screen associated with our NPDES permit. However, we will continue to monitor Outfall 003 and take the appropriate action, which could include the resizing of the bar screen, if the discharge of solids becomes an issue.

5. *The facility had one aerator out of service in "Lake Killdeer". This aerator will need to be repaired.*

Response: The one aerator that was out of service has been replaced. (See Attachment 3)

6. *The Nitrate-Nitrogen samples taken on 3/16/2009 and 3/26/2009 for Outfall 001 exceeded the allowable holding time and maximum holding temperature.*

Response: Since Mr. Lamb's inspection, EDCC has started using Fed-Ex to ship our water samples to Arkansas Analytical, our contract laboratory. All samples subsequently have been delivered within allowable holding times and well below maximum holding temperatures.

7. *The staff gauge at Outfall 001 was not installed flat against the Parshall flume.*

Response: The staff gauge at Outfall 001 has been replaced with a Plant PRO Porcelain Enameled Iron Staff Gauge. (See Attachment 4)

8. *The flow meter at Outfall 001 had an error of 11.4%.*

Response: The flow meter at Outfall 001 was recalibrated following Mr. Lamb's inspection and had a less than 5% error.

9. *Proper operation and maintenance of the flow meter at Outfall 001 is not occurring. Monthly flow checks, to ensure accuracy with 10%, are not being performed.*

Response: EDCC has implemented a new Flow Calculation Sheet that will be completed once per week to ensure proper accuracy of the flow meter. The form will be kept at the Outfall 001 building or in the EDCC Environmental Department. (See Attachment 5)

10. *The flow entering the Parshall flume at Outfall 001 was not entering straight into the flume. This was causing an eddy against the right wall of the flume and backwash on the left wall. The effluent must curve around to the right to enter the flume. The backwash causes excessive flow turbulence through the flume.*

Response: Concrete work has been done on the basin leading to the entrance of Parshall flume at Outfall 001. This has straightened the flow entering the flume significantly. EDCC personnel will continue to closely monitor these changes and perform more changes as warranted.

11. *Housekeeping at the railroad contractors lay down yard needs to be improvement.*

Response: The railroad contractor's area was cleaned and all trash and debris was properly disposed.

12. *The annual comprehensive site compliance evaluation for 2008 was signed by Mr. David Sartain; however, the signatory authorized in the Storm Water Pollution Prevention Plan is the General Manager, not the Environmental Coordinator.*

Response: The 2009 annual comprehensive site compliance evaluation was performed by GBMc. & Associates on June 05, 2009. The evaluation was signed by EDCC's General Manager, Greg Withrow.

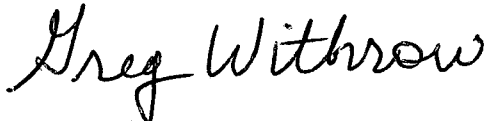
13. *Outfalls 002, 006, and 007 only have an estimated flow measurement required so there is currently no way to flow weight these samples. The Permit requires the 24 hour composite samples to be flow weighted.*

Response: As stated in the above comment, the NPDES Permit requirements for flow at Outfalls 002, 006 and 007 are that flow will be monitored and estimated once per day when discharging. Outfall 002 is an emergency overflow for our initial treatment pond and seldom discharges. Outfalls 006 and 007 discharges consists of storm water only. When discharge begins at 006 and 007, a sample is collected with enough volume to be sure appropriate analyses can be conducted. If discharge continues for more than an hour, samples are collected and measurements are taken from the staff gages which are located in the Outfall


flumes. Samples are composited using all of the aliquot with the highest flow and the appropriate percentage of the aliquots with lesser flows. Although the flows are estimated, they are still usable for compositing purposes.

If there are any questions regarding this matter, please contact David Sartain at (870) 863-1400.

Sincerely,

A handwritten signature in cursive script that reads "Greg Withrow". The signature is written in black ink and is positioned above the printed name and title.

Greg Withrow
General Manager

	SUBJECT: Wastewater Sample Collection			Approved: <i>[Signature]</i>
	REFERENCE/ SUPERCEDES: New	PREPARED BY: D. Sartain	LOCATION: Environmental	NUMBER: ENV-01 DATE: 06/15/09

I. PURPOSE AND SCOPE

The following procedures are to be used by all El Dorado Chemical Company (EDCC) environmental employees to ensure accountability for and documentation of sample integrity from the time all samples are collected until receipt by the receiving laboratory. These procedures are intended to document each stage of the sample's life cycle (i.e., collection, transport, and delivery).

II. DEFINITIONS

2.1 Custody-Physical Possession or Control.

A sample is "under custody" if it is in the possession or under the control of the Sample Custodian so as to prevent tampering or alteration of its characteristics. A sample is under custody if:

2.1.1 It is in your possession or in your view after assuming possession.

2.1.2 It was in your possession and then you locked or sealed the sample in a manner to prevent tampering, or

2.2 Sample


A portion of an environmental or source matrix that is collected and used to characterize that matrix.

2.3 Sample Custodian

The person possessing the sample.

2.4 Chain of Custody

A process whereby a sample is maintained under physical possession or control. Chain of custody procedures are one piece of a large quality assurance program to assure data and conclusions are defensible in a legal or regulatory situation.

	SUBJECT: Wastewater Sample Collection			Approved:
				NUMBER: ENV-01
	REFERENCE/ SUPERCEDES: New	PREPARED BY: D. Sartain	LOCATION: Environmental	DATE: <u>06/15/09</u>

2.5. Sample Set

Collection of samples collected during one sampling event.

II. SAMPLE COLLECTION

3.1. Sampling.

Samples are routinely collected by EDCC employees using standard collection procedures defined by media specific Standard Operating Procedures ("SOPs").

3.2. Custody Assignment

The sampler shall ensure proper collection, preservation and labeling of the sample. The sampler will also initiate the chain of custody documentation process, prepare sample submission information, and prepare and store samples for transport to the laboratory. Since as few people as possible should handle samples, the sampler is responsible for the initial custody of the sample.

3.3. Sample Kits.


Collection kits with containers, preservatives, and sampling instructions may be provided by EDCC's contracted lab. EDCC's contracted lab is available for consultation purposes if there are questions about sample collection and preservation regardless of the laboratory used.

3.4. Sample Identification.

To ensure samples are traceable, samples shall be clearly labeled immediately upon collection. Labeling information may vary by media SOPs, but labels must be written legibly, using a ballpoint (indelible) pen, unique for the sample/case and firmly fixed to the sample. The sample label shall contain the unique sample number or identification, sample type, name of sampler, preservation method, priority code, and exact date and time of collection.

3.5 Sample Preservation

Sample preservation instructions are provided in sample kit collection instructions. Sample

	SUBJECT: Wastewater Sample Collection			Approved:
				NUMBER: ENV-01
	REFERENCE/ SUPERCEDES: New	PREPARED BY: D. Sartain	LOCATION: Environmental	DATE: <u>06/15/09</u>

preservation actions shall be documented in field logs, on chain of custody forms, on lab sheets, and on sample labels.


IV. SAMPLING DOCUMENTATION

4.1. Field Logbooks

In any sampling effort, there are field information and measurements that need to be recorded. This information shall be retained in a sampler's field log. Examples of information entered include: purpose of sampling, producer, type of sample, address, sample composition, description of sampling point, sampling method, date and time of collection, sample identification number, field data, and preservation method. This record may be considered evidence and part of the larger aspect of data defensibility. Logbooks shall be kept in a safe place.

4.2 Chain of Custody Records

Agency Chain of Custody Records (COCR) shall be used when submitting a sample for analysis. Chain of custody forms shall be completed by the sampler at the time of sample collection and shall be submitted with each sample set. The sampler shall print their name, sign, and date the form. The completed form shall be signed by the sampler and dated (chain of custody block) and placed in a waterproof carrier (e.g., zip-lock bag) if it is a water sample. The form shall be packaged with the sample for transport to the laboratory.

	SUBJECT: Wastewater Sample Collection		Approved:
	NUMBER: ENV-01		
	REFERENCE/ SUPERCEDES: New	PREPARED BY: D. Sartain	LOCATION: Environmental

4.3. Sample Submittal and Test Request Form. With each sample submitted to the laboratory for analysis, the sampler shall include the following information:

- 4.3.1. The analytical request
- 4.3.2. Sample identification
- 4.3.3. Field data
- 4.3.4. The Chain of Custody Record
- 4.3.5. Copies of applicable documents (e.g., MSDS, sample formulations (if applicable)).
- 4.3.6. Any other information required to meet laboratory testing and reporting requirements

V. SAMPLE PACKAGING, TRANSPORT AND TRANSFER OF CUSTODY

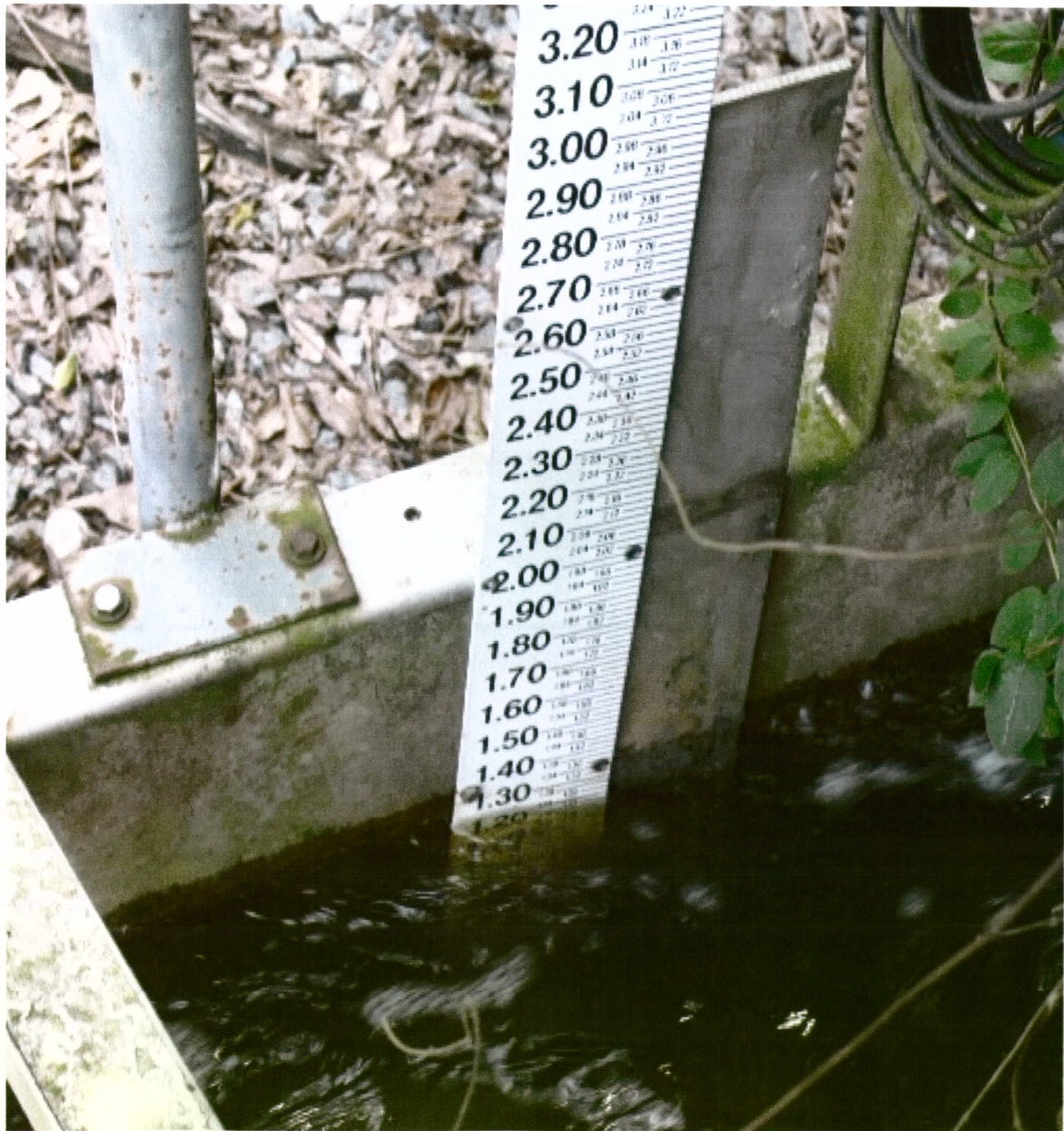
5.1. Sample Packaging. The correct preparation and preservation of samples for transport are critical to ensure sample integrity.

- 5.1.1. The sampler should contact the laboratory if unsure of any aspect of sample collection, preservation, packaging, and transport.

Aerators in Lake Killdeer



New Staff Gauge At Outfall 001



El Dorado Chemical Flow Calculation Sheet

Date: _____ Time: _____

Name: _____

Head in Inches: _____ Head in Feet: _____

Recorded Flow: _____

Calculated Flow: _____

ISCO Open channel Flow Chart

$$\% \text{ Error} = \frac{\text{Recorded Flow} - \text{Calculated Flow}}{\text{Calculated Flow}} \times 100$$

% Error = _____

If Over 10% recalibrate ISCO 4220 Submerged Probe

COMMENTS:

From: Origin ID: ELDA (870) 863-1484
David Sartain
El Dorado Chemical Co.
4500 Northwest Ave.



El Dorado, AR 71730

Ship Date: 14JUL09
ActWgt: 1.0 LB
CAD: 5887030/NET9060
Account#: S *****

Delivery Address Bar Code



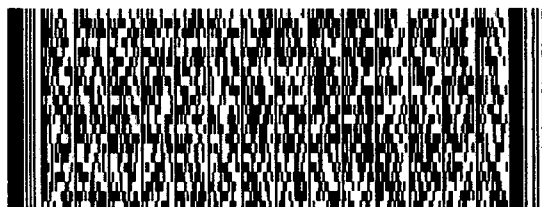
Ref #
Invoice #
PO #
Dept #

SHIP TO: (501) 682-0640 BILL SENDER
Cindy Garner
ADEQ - Water Division Enforcement
5301 N SHORE DR

NORTH LITTLE ROCK, AR 72118

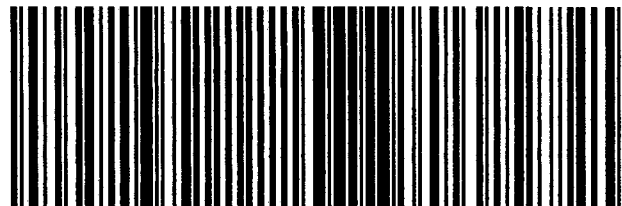
WED - 15JUL AA
PRIORITY OVERNIGHT

TRK# 7977 6040 2673
0201



XH LITA

72118
AR-US
MEM



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ADEQ

ARKANSAS
Department of Environmental Quality

July 28, 2009

Greg Withrow, General Manager
El Dorado Chemical Company, Inc.
P.O. Box 231
El Dorado, AR 71731

RE: NPDES Permit AR0000752, AFIN 70-00040
Response to Inspection

Dear Mr. Withrow:

ADEQ has received your response to the May 13, 2009 routine compliance of your facility by our District Field Inspector, John Lamb. Your letter appears to adequately address the discrepancies identified during the visit.

The Department will keep the inspection and response on file and will consider them as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires ADEQ to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any violations.

Thank you for your attention to this matter. If we need further information, we will contact you. Should you have any questions, feel free to contact me by phone at 501-682-0632 or e-mail at robertsa@adeq.state.ar.us. In any written correspondence to this Department, please refer to NPDES Permit AR0000752 and AFIN 70-00040.

Sincerely,



Anne Roberts
Enforcement Analyst
Enforcement Branch
Water Division