



ARKANSAS  
Department of Environmental Quality

May 31, 2012

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 5/2/2012, 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:

- 1. The facility's thermometers have not been calibrated within the last year. This is a violation of Part II.C.3 of the permit.**
- 2. Proper preservation of samples was not correctly documented on several of the facility's Chain of Custodies reviewed for the month of March 2012. Oil and Grease (Outfalls 002, 006 and 007), Metals, (Outfalls 001, 002, 006 and 007) TDS (one sample, Outfall 001) Nitrate and Sulfates (Outfall 001) and fecal coliform (Outfall 003) were all missing part or all of the correct preservation documentation. This is a violation of Part II.C.3 of the permit.**
- 3. The facility incorrectly reported TDS mass loading monthly average and daily maximum on the March 2012 DMR.**
- 4. The facility failed to perform the Non-Storm Water certification on outfalls 200, 300, 400 and 500 as noted in the facility's Annual Comprehensive Site Compliance Evaluation performed by the facility on August 08, 2011. This is a violation Part III.15.D.1.a of the permit.**
- 5. The facility had two areas noted on the southwest side of the property where concrete truck wash out had occurred. These areas were not designated in the Storm Water Pollution Prevention Plan (SWPPP) and had no controls installed on them. This is a violation of Part III.15.B.7.a of the permit.**

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to [Water-Inspection-report@adeq.state.ar.us](mailto:Water-Inspection-report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by June 12, 2012.

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

 <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2>	Form Approved OMB No. 2040-0003
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**Section A: National Data System Coding**

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

**Section B: Facility Data**

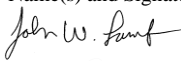
Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>El Dorado Chemical Company, Inc.</b> 4500 North West Ave El Dorado, AR	Entry Time/Date <b>09:55 /5/2/2012</b>	Permit Effective Date <b>7/1/2002</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Larken Pennington, Environmental Technician /870-863-1125</b> <b>Kyle Wimsett, EHS Manager/870-863-1484</b>	Exit Time/Date <b>15:30 /5/2/2012</b>	Permit Expiration Date <b>6/30/2007</b>
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Mr. Greg Withrow, General Manager/870-863-1400</b> 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)

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

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

SEE PAGE 9 FOR FINDINGS

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 <b>24 May 2012</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**SECTION A: PERMIT VERIFICATION**

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA NE

DETAILS: **Permit is expired, but facility has applied for a renewal as required**

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

**SECTION B: RECORDKEEPING AND REPORTING EVALUATION**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT S M U NA NE

DETAILS: **See page 8 and 9**

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

**SECTION C: OPERATIONS AND MAINTENANCE**

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED S M U NA NE

DETAILS:

- 1. TREATMENT UNITS PROPERLY OPERATED: S M U NA NE
- 2. TREATMENT UNITS PROPERLY MAINTAINED: S M U NA NE
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: S M U NA NE
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: S M U NA NE
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE: S M U NA NE
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: S M U NA NE
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: S M U NA NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: Y N NA NE
- 9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: Y N NA NE
- 10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: Y N NA NE
- 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: Y N NA NE
- 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: Y N NA NE
- 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: Y N NA NE
- 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: Y N NA NE
- 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: Y N NA 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 checked="" type="checkbox"/> Y <input 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 type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" 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 NE

DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>parshall flume</u>	<input checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> Y <input 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 NE

DETAILS:

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 and Bio-Analytical</u>	
b. LAB ADDRESS: <u>Little Rock, AR and Doyline, LA</u>	
c. PARAMETERS PERFORMED: <u>all but pH, temp, and d.o.</u> <u>Bio-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:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Slight	Trace	None	green	
002, 006, 007	No discharge						
003	None	None	None	None	None	colorless	

**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: 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: **05/02/2012**      Time: **11:35**

Head in Inches:      Feet: **0.8**

Type & Size of Primary Flow Measurement Device: **12 parshall flume**

Name & Model of Secondary Flow Measurement Device: **Isco 44220**

Date of last Calibration of Secondary Flow Device: **8/21/2011**

Recorded Flow at Date & Time Listed Above: **1.84 mgd** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **1.841 mgd**  
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition)

% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				

% Error =	1.84	-	1.841	X 100	
	1.841				

% Error =	<b>0.05</b>	%	
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Comments: **Less than 10 percent is acceptable**

**DMR Calculation Check**

**Reporting Period:** From 2012 03 01 To 2012 03 31  
 Year Month Day Year Month Day

**Parameter Checked:** TDS

	<b>Loading Mass Mo. Avg. - lbs/day</b>	<b>Concentration Monthly Mo. Avg. - mg/l</b>	<b>7-day Avg. - mg/l</b>
<b>Reported Value:</b>	<u>4553.64</u>	<u>260</u>	<u>260</u>
<b>Calculated Value:</b>	<u>4878.9</u>	<u>260</u>	<u>260</u>
<b>Permit Value:</b>	<u>report</u>	<u>237</u>	<u>358</u>

**If calculated value does not equal reported value, explain:**

**DOES NOT EQUAL, SEE PAGE 9**

**Mo. Average concentration exceeds the permitted limit.**



## NPDES Compliance Inspection Report Further Explanation

**Sections B.3 and F.3:** The facility's thermometers have not been calibrated within the last year.

**Sections B and D.6.b:** Proper preservation of samples was not correctly documented on several of the facility's Chain of Custodies reviewed for the month of March 2012. Oil and Grease (Outfalls 002, 006 and 007), Metals, (Outfalls 001, 002, 006 and 007) TDS (one sample, Outfall 001) Nitrate and Sulfates (Outfall 001) and fecal coliform (Outfall 003) were all missing part or all of the correct preservation documentation. All bottles come with proper preservative in them from the contract lab, the facility needs better documentation of the preservation methods used.

**Sections B.1: and Page 8:** The facility incorrectly reported TDS mass loading monthly average and daily maximum on the March 2012 DMR. The facility reported 4553.64 lbs/day (monthly average) and 4770.48 lbs/day (daily max). The correct numbers are 4878.9 lbs/day (monthly average) and 5421 lbs/day (daily max). This occurred by using the wrong flow data for the sample taken on March 13. The flow for the March 14 was mistakenly used.

**Section J:** The facility failed to perform the Non-Storm Water certification on outfalls 200, 300, 400 and 500 as noted in the facility's Annual Comprehensive Site Compliance Evaluation performed by the facility on August 08, 2011.

**Section J.10:** The facility had two areas noted on the southwest side of the property where concrete truck wash out had occurred. These areas were not designated in the Storm Water Pollution Prevention Plan (SWPPP) and had no controls installed on them.

The facility also reported several permit violations for TDS over the last year for Outfall 001 and also several violations (zinc, and TDS) for Outfalls 006 and 007.

<b>Water Division NPDES Photographic Evidence Sheet</b>							
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<b>Location:</b>	El Dorado Chemical Company, Inc.						
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<b>Photographer:</b>	John W. Lamb	<b>Witness:</b>	None			
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<b>Photo #</b>	1	<b>Of</b>	4	<b>Date:</b>	5/2/2012	<b>Time:</b>	11:04
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<b>Description:</b>	Concrete washout on SW side of property						
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<b>Photographer:</b>	John W. Lamb	<b>Witness:</b>	None			
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<b>Photo #</b>	2	<b>Of</b>	4	<b>Date:</b>	5/2/2012	<b>Time:</b>	11:04
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<b>Description:</b>	As above						
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**Water Division NPDES Photographic Evidence Sheet**

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

**Photographer:** John W. Lamb      **Witness:** None

**Photo #** 3    **Of** 4      **Date:** 5/2/2012    **Time:** 11:05

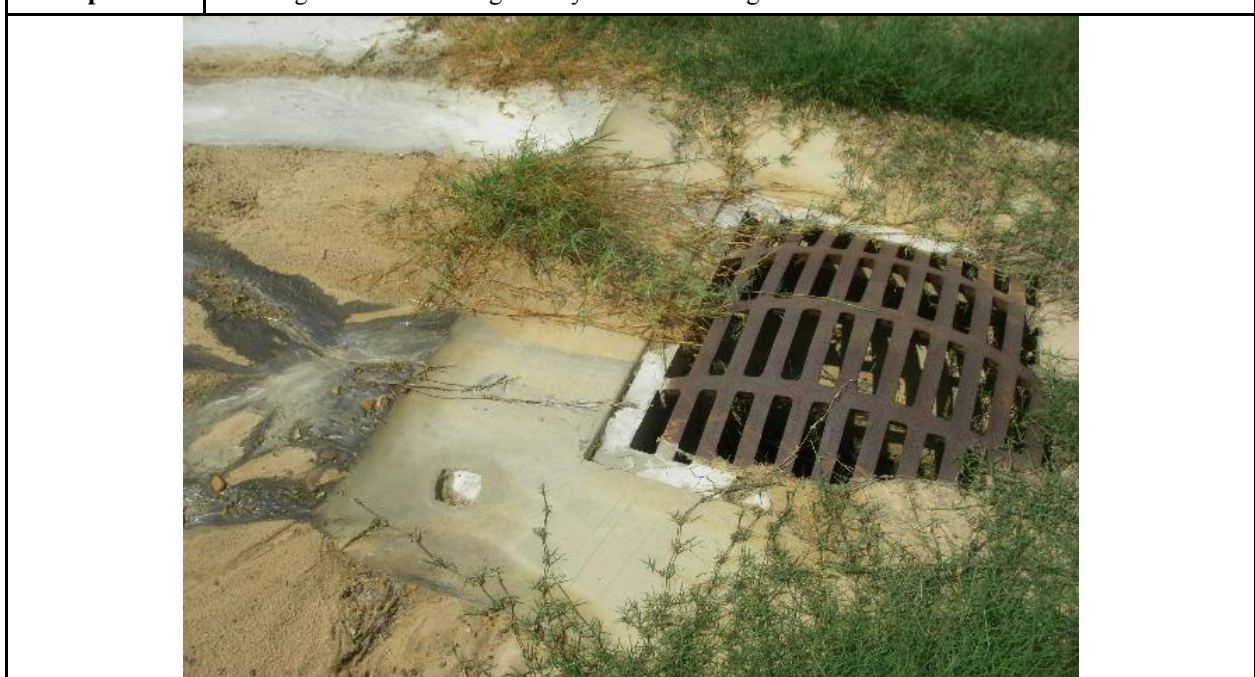
**Description:** Second area of washout on SW side of property



**Photographer:** John W. Lamb      **Witness:** None

**Photo #** 4    **Of** 4      **Date:** 5/2/2012    **Time:** 11:05

**Description:** Showing washout reaching facility's storm sewer grate



**From:** [Brent Parker](#)  
**To:** [Water-Inspection-Report](#)  
**Cc:** [Lamb, John \(LAMBJ@adeq.state.ar.us\)](#); [John Carver](#)  
**Subject:** El Dorado Chemical, Permit #: AR0000752  
**Date:** Monday, June 18, 2012 9:43:20 AM  
**Attachments:** [El Dorado Chemical Company Permit # AR0000752.pdf](#)

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Please find attached to this e-mail correspondence associated with the NPDES inspection conducted at El Dorado Chemical Company on May 2, 2012.



CHEMICAL COMPANY

June 18, 2012

Mr. John Lamb, Inspector  
Water Division  
Arkansas Department of Environmental Quality

RE: Compliance Inspection

AFIN: 70-00040                      NPDES Permit Number: AR0000752

Dear Mr. Lamb:

The following information is being submitted by El Dorado Chemical Company (EDCC) in response to the Arkansas Department of Environmental Quality's (ADEQ) letter dated May 31, 2012. This letter identified five findings which required action by EDCC.

**ADEQ Item #1**

The facility's thermometers have not been calibrated within the last year. This is a violation of Part II.C.3.

**EDCC Response to Item #1**

On June 11, 2012, EDCC conducted the necessary calibrations on both the thermometer utilized inside the ISCO refrigerator as well as the RTD utilized to calibrate the temperature measurement function on the ISCO sampler. These calibrations were conducted pursuant to Method 2550 B of Standard Methods for Examination of Water and Waste Water. The calibrations were completed utilizing a NIST Certified 100 ohm Platinum Resistance Temperature Detector (RTD) (See Attachment). The results of the calibrations revealed that both thermometers were well within 10% of the standard (See Attachment). In the future EDCC will conduct the thermometer calibrations on an annual basis as well as maintain the necessary documentation for NIST certification of the reference device.

**ADEQ Item #2**

Proper preservation of samples was not correctly documented on several of the facility's Chain of Custodies reviewed for the month of March 2012. Oil and Grease (Outfalls 002, 006, and 007), Metals, (Outfalls 001, 002, 006, and 007), TDS (one sample, Outfall 001), Nitrate and Sulfates (Outfall 001) and fecal coliform (Outfall 003) were missing part or all of the correct preservation documentation. This is a violation of Part II.C.3 of the permit.

**EDCC Response to Item #2**

EDCC utilizes a contract laboratory for all sample analysis. This lab also provides EDCC with prepared sample containers. The type of container preparation is dependent upon the target parameter to be measured. It is also EDCC's Standard Operating Procedure to ice all samples in an ice chest for shipment to the EDCC contract laboratory. The completed Chain of Custodies in question reflect that

samples were received by the contract laboratory on ice. In the future EDCC will correctly document all sample preservation techniques on the Chain of Custody.

It should be noted that EDCC utilizes clean metal sampling containers as described by EPA Method 1660. Section 8.4.1 of Method 1660 states:

*"Acid preservation of samples is performed in the field or in the laboratory. Field preservation is necessary for determinations of trivalent chromium. It has also been shown that field preservation can increase sample holding times for hexavalent chromium to 30 days; therefore it is recommended that preservation of samples for hexavalent chromium be performed in the field. For other metals, however, the sampling team may prefer to utilize laboratory preservation of samples to expedite field operations and to minimize the potential for sample contamination."*

Based on Section 8.4.1 field preservation of metals samples required by Permit Number AR0000752 is not necessary.

**ADEQ Item #3**

The facility incorrectly reported TDS mass loading monthly average and daily maximum on the March 2012 DMR.

**EDCC Response to Item #3**

EDCC has corrected the March 2012 DMR as required. The corrected DMR was submitted to ADEQ on June 7, 2012 (See Attachment).

**ADEQ Item #4**

The facility failed to perform the Non-Storm Water certification on outfalls 200, 300, 400 and 500 as noted in the facility's Annual Comprehensive Site Compliance Evaluation performed by the facility on August 08, 2011. This is a violation of Part III.15.D.1.a of the permit.

**EDCC Response to Item #4**

EDCC conducted the Non-Storm Water Certification on outfalls 200, 300, 400, and 500 on May 3, 2012 (see attached). The Certifications have been inserted into the EDCC Storm Water Pollution Prevention Plan (SWPPP).

**ADEQ Item #5**

The facility had two areas noted on the southwest side of the property where concrete truck wash out had occurred. These areas were not designated in the Storm Water Pollution Prevention Plan (SWPPP) and had no controls installed on them. This is a violation of Part III.15.B.7.a of the permit.

**EDCC Response to Item #5**

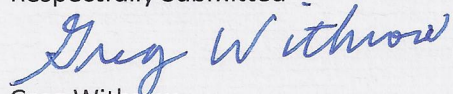
The concrete residue noted on the southwest side of the property has been removed and properly disposed of. Also, EDCC has completed construction of a concrete truck wash out facility at the East end of the EDCC Boiler House. The facility consists of a shallow earthen pit lined with plastic sheeting (see photo attached). In the event that a concrete truck needs to conduct wash out operations the plastic

Mr. John Lamb  
June 15, 2012  
Page 3

sheeting will be applied and all concrete and concrete wash out material will be contained within the earthen pit and allowed to harden. The hardened material will then be properly disposed of.

If you should have additional questions regarding this information please feel free to contact Kyle Wimsett or myself at 870-863-1400.

Respectfully Submitted



Greg Withrow  
EDCC General Manager

cc: John Carver, LSB

625 East Bunker Court  
 Vernon Hills, Illinois 60061  
 PH: 866-466-6225  
 Fax: 847-327-2993  
 www.innocalsolutions.com

*NIST Traceable*  
**Calibration Report**



Reference Number: **179879**  
 PO Number: **349892**

**EL Dorado Chemical Company**  
 4500 N West Ave  
 EL Dorado, AR 71730 United States

**Manufacturer:** Oakton  
**Model Number:** 35626-20  
**Description:** Temperature RTD, Acorn 6 Thermometer  
**Asset Number:** CP72587  
**Serial Number:** 808513  
**Procedure:** See Probe Report

**Calibration Date:** 06/01/2012  
**Calibration Due Date:** 06/01/2013  
**Condition As Found:** In Tolerance  
**Condition As Left:** In Tolerance, No adjustment

**Remarks:**

NIST-traceable calibration performed on the unit referenced above in accordance with customer requirements, published specifications and the lab's standard operating procedures. The meter was calibrated as a temperature system with probe cp72588 from certificate 224695. All measurement data from this temperature system calibration is included on the probe certificate. No adjustments were made to the unit.

Measurements and data reflect performance of the total system; performance of individual components cannot be guaranteed.

**Temperature:** 22° C  
**Humidity:** 30% RH  
**Rpt. No.:** 224694

Calibration Performed By:			Quality Reviewer:	
Name	Title	Phone	Name	Date
Panagakis, Louis A	Metrologist	847-327-5320	Pietronico, Mike	6/4/2012

*This report may not be reproduced, except in full, without written permission of innocal. The results stated in this report relate only to the items tested or calibrated. Measurements reported herein are traceable to SI units via national standards maintained by NIST and were performed in compliance with MIL-STD-45662A, ANSI/NCCL Z540-1-1994, 10CFR50, Appendix B, ISO 9002-94, and ISO 17025:2005. Guard Banding, if reported on this certificate, is applied at a Z-factor of 30% for test points with a test uncertainty ratio (TUR) below 4:1. The estimated measurement uncertainty (EMU), if reported on this certificate, is being reported at a confidence level of 95% or K=2 unless otherwise noted in the remarks section.*



625 East Bunker Court  
 Vernon Hills, Illinois 60061  
 PH: 866-466-6225  
 Fax: 847-327-2993  
 www.innocalsolutions.com

## NIST Traceable Calibration Report



Reference Number: 179879  
 PO Number: 349892

**EL Dorado Chemical Company**  
 4500 N West Ave  
 EL Dorado, AR 71730 United States

**Manufacturer:** Cole-Parmer  
**Model Number:** 08117-70  
**Description:** RTD Probe, Immersion 10"  
**Asset Number:** CP72588  
**Serial Number:** CP72588  
**Procedure:** DS Oakton 35626-20 with a 1.1°C RTD Probe

**Calibration Date:** 06/01/2012  
**Calibration Due Date:** 06/01/2013  
**Condition As Found:** In Tolerance  
**Condition As Left:** In Tolerance, No adjustment

**Remarks:**

NIST-traceable calibration performed on the unit referenced above in accordance with customer requirements, published specifications and the lab's standard operating procedures. The probe was calibrated as a temperature system with asset # cp72587 from certificate 224694 as the readout. Measurements and data below reflect performance of the total system; performance of individual components cannot be guaranteed. No adjustments were made to the unit.

### Standards Utilized

Asset No.	Manufacturer	Model No.	Description	Cal. Date	Due Date
CP05053	Hart Scientific	5615-9	Temperature, Platinum RTD 9" Probe	06/07/2011	06/07/2012
CP32042	Hart Scientific	5680	Temperature, Probe, SPRT	01/26/2012	04/13/2013
CP41979	Hart Scientific	5628	Thermometer, PRT-Temperature Sensor	01/31/2012	07/31/2013
CP56003	Hart Scientific	1590	Temperature, Super Thermometer	02/28/2012	02/28/2013
CPM019	Hart Scientific	850	Temperature RTD, PRT Display	05/07/2011	11/07/2012
CPM062	Hart Scientific	2560	Temperature, SPRT Module	05/21/2012	05/21/2014
CPM140	Hart Scientific	5614	Temperature, Probe, PRT	06/03/2011	06/03/2012

### Calibration Data

FUNCTION TESTED	Nominal Value	As Found	Out of Tol	As Left	Out of Tol	CALIBRATION TOLERANCE
Temperature Accuracy	-38.834 °C	-38.8		Same		-39.997 to -37.671 °C [EMU 0.090 °C][TUR 13:1]
	0.010 °C	-0.1		Same		-1.108 to 1.128 °C [EMU 0.087 °C][TUR 13:1]
	231.928 °C	231.0		Same		229.500 to 234.356 °C [EMU 0.093 °C][TUR 26:1]
	419.527 °C	418.7		Same		416.964 to 422.090 °C [EMU 0.087 °C][TUR 29:1]

Temperature: 22° C  
 Humidity: 30% RH  
 Rpt. No.: 224695

Calibration Performed By:			Quality Reviewer:	
Panagakis, Louis A	Metrologist	847-327-5320	Pietronicco, Mike	6/4/2012
Name	Title	Phone	Name	Date

This report may not be reproduced, except in full, without written permission of Innocal. The results stated in this report relate only to the items tested or calibrated. Measurements reported herein are traceable to SI units via national standards maintained by NIST and were performed in compliance with MIL-STD-45662A, ANSI/NCSL Z540-1-1994, 10CFR50, Appendix B, ISO 9002-94, and ISO 17025:2005. Guard Banding, if reported on this certificate, is applied at a Z-factor of 30% for test points with a test uncertainty ratio (TUR) below 4:1. The estimated measurement uncertainty (EMU), if reported on this certificate, is being reported at a confidence level of 95%, or K=2 unless otherwise noted in the remarks section.

# Outfall 001 Temperature Calibration

Meter: NIST Cert. Oakton RTD

Date	Technician	Thermometer (Isco sampler refrigerator)	NIST RTD	Difference	Coments
6/11/2012	B. Parker	74.1 F	73.9 F	0.003%	None

Date	Technician	Outfall 001 RTD	NIST RTD	Difference	Coments
6/11/2012	B. Parker	73.6 F	73.6 F	0.000%	None



CHEMICAL COMPANY

June 7, 2012

Arkansas Department of Environmental Quality  
Water Enforcement Branch  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: NPDES Permit AR0000752 Discharge Monitoring Report for period ending March 31, 2012.

Enclosed you will find a corrected copy of the Discharge Monitoring Report 001-Monthly-Process Wastewater ending March 31, 2012. Total Dissolved Solids (monthly average loading and daily max loading) were miscalculated in the Discharge Monitoring Report submitted on April 24, 2012. This occurred by using the incorrect flow data for the sample taken on March 13, 2012. The flow for March 14, 2012 was mistakenly used.

If you have any questions regarding this report, please contact Larken Pennington at (870) 863-1125.

Sincerely,

A handwritten signature in blue ink that reads "Greg Withrow".

Greg Withrow  
General Manager

Enclosures

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: EL DORADO CHEMICAL CO.  
ADDRESS: P.O. BOX 231  
EL DORADO, AR 717310231

AR0000762  
PERMIT NUMBER

001A  
DISCHARGE NUMBER

DMR Mailing ZIP CODE: 717310231  
MAJOR

FACILITY: EL DORADO CHEMICAL CO., INC.  
LOCATION: 4500 NORTHWEST AV  
EL DORADO, AR 71730

MONITORING PERIOD  
FROM 3/1/12 TO 3/31/12

001-MONTHLY-PROCESS WASTEWATER  
External Outfall

No Discharge

PARAMETER	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
	VALUE	UNITS	PERMIT REQUIREMENT	VALUE	UNITS	PERMIT REQUIREMENT			
Sulfate, total (as SO4)	588.8	lb/d	588.8	35.3	mg/L	35.3	0	Monthly	Com24
	MEASUREMENT	Reg. Mon. MO AVG	Reg. Mon. DAILY MX	Monthly Average	Daily Max				
00945 1 0 Effluent Gross	0.00	lb/d	0.00	0.00	ug/L	0.00	0	Monthly	Com24
	SAMPLE MEASUREMENT	MO AVG	DAILY MX	MO AVG	DAILY MX				
Selenium, total recoverable	0.18	lb/d	0.18	10.7	ug/L	10.7	0	Monthly	Com24
	MEASUREMENT	MO AVG	DAILY MX	MO AVG	DAILY MX				
00981 1 0 Effluent Gross	0.14	lb/d	0.14	8.10	ug/L	8.10	0	Monthly	Com24
	SAMPLE MEASUREMENT	MO AVG	DAILY MX	MO AVG	DAILY MX				
Zinc, total recoverable	2.43	Mgal/d	3.20	260.0	ug/L	260.0	1	2x Month	Com24
	MEASUREMENT	MO AVG	DAILY MX	Monthly Average	Daily Max				
01119 1 0 Effluent Gross	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24
	SAMPLE MEASUREMENT	MO AVG	DAILY MX	Monthly Average	Daily Max				
Flow, in conduit or thru treatment plant	2.43	Mgal/d	3.20	260.0	mg/L	260.0	1	2x Month	Com24
	MEASUREMENT	MO AVG	DAILY MX	Monthly Average	Daily Max				
50050 1 0 Effluent Gross	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24
	SAMPLE MEASUREMENT	MO AVG	DAILY MX	Monthly Average	Daily Max				
Solids, total dissolved	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24
	MEASUREMENT	MO AVG	DAILY MX	Monthly Average	Daily Max				
70295 1 0 Effluent Gross	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24
	SAMPLE MEASUREMENT	MO AVG	DAILY MX	Monthly Average	Daily Max				

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	Gregg Withrow - General Manager	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NUMBER	DATE
TYPED OR PRINTED		<i>Gregg Withrow</i>	870 - 863 - 1400	6.7.12
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)	I certify under penalty of law that this document and all attachments were prepared under no direction or coercion in accordance with a system designed to assure that qualified personnel prepare, gather and analyze the monitoring information based on my expertise, the person or persons performing the analysis, and the test of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			

REPORT FLOW AS MONTHLY AVG. & DAILY MAX. IN MGD (MILLION GALLONS/DAY), P.O. MUST BE EQUAL OR EXCEED THE PERMIT LIMIT AT ALL TIMES (INSTANTANEOUS MINIMUM), PERMIT APPEAL 06/27/67, CAO 02-059  
LIMITS APPLY FOR YEARS FROM THE EFFECTIVE DATE OF THE RENEWAL PERMIT: 70-00040

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: EL DORADO CHEMICAL CO.  
ADDRESS: P.O. BOX 231  
EL DORADO, AR 717310231

AR0000752  
PERMIT NUMBER

001A  
DISCHARGE NUMBER

DMR Mailing ZIP CODE: 717310231  
MAJOR

FACILITY: EL DORADO CHEMICAL CO., INC.  
LOCATION: 4500 NORTHWEST AV  
EL DORADO, AR 71730

MONITORING PERIOD  
FROM 3/1/12 TO 3/31/12

001-MONTHLY PROCESS WASTEWATER  
External Outfall

No Discharge

ATTN: DAVID SARTAIN/GREG WITHROW

PARAMETER	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
	VALUE	UNITS	PERMIT REQUIREMENT	VALUE	UNITS	PERMIT REQUIREMENT			
Sulfate, total (as SO4)	588.8	lb/d	588.8	35.3	mg/L	35.3	0	Monthly	Com24
	0.00	lb/d	0.00	0.00	ug/L	0.00	0	Monthly	Com24
00945 1 0 Effluent Gross	0.00	lb/d	0.00	0.00	ug/L	0.00	0	Monthly	Com24
	0.18	lb/d	0.18	10.7	ug/L	10.7	0	Monthly	Com24
Zinc, total recoverable	0.18	lb/d	0.18	8.10	ug/L	8.10	0	Monthly	Com24
	0.14	lb/d	0.14	8.10	ug/L	8.10	0	Monthly	Com24
01094 1 0 Effluent Gross	0.14	lb/d	0.14	8.10	ug/L	8.10	0	Monthly	Com24
	0.14	lb/d	0.14	8.10	ug/L	8.10	0	Monthly	Com24
Copper, total recoverable	0.14	lb/d	0.14	8.10	ug/L	8.10	0	Monthly	Com24
	0.14	lb/d	0.14	8.10	ug/L	8.10	0	Monthly	Com24
Flow, in conduit or thru treatment plant	2.43	Mgal/d	3.20	260.0	mg/L	260.0	1	2x Month	Com24
	2.43	Mgal/d	3.20	260.0	mg/L	260.0	1	2x Month	Com24
50050 1 0 Effluent Gross	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24
	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24
70295 1 0 Effluent Gross	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24
	4878.9	lb/d	5421.0	260.0	mg/L	260.0	1	2x Month	Com24

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER  
Greg Withrow - General Manager

DATE: 6.7.12

TELEPHONE: 870-863-1400

AREA CODE: 870

NUMBER: 863-1400

DATE: MMDDYY

TYPED OR PRINTED

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: *Greg Withrow*

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

REPORT FLOW AS MONTHLY AVG. & DAILY MAX. IN MGD (MILLION GALLONS/DAY), D.O. MUST BE EQUAL OR EXCEED THEREPERMIT LIMIT AT ALL TIMES (INSTANTANEOUS MINIMUM), PERMIT APPEAL 06/27/97, CA002-059  
LIMITS APPLY FOR 3 YEARS FROM THE EFFECTIVE DATE OF THE RENEWAL PERMIT.

EL DORADO CHEMICAL COMPANY  
EL DORADO, ARKANSAS  
NON-STORM WATER CERTIFICATION

I, Larken Pennington, certify that (1) the outfalls and drainage areas covered by Permit No. ARR000000 have been evaluated for the presence of non-storm water discharges, (2) that non-storm water discharges from these outfalls, and drainage areas if applicable, are identified in the SWPPP, and (3) that no non-storm water discharges are made via the outfalls covered by the permit other than those non-storm water discharges authorized and identified in the SWPPP.

Date of evaluation: 5/3/12

Description of the evaluation criteria or testing method used:

no flow

List of the outfalls that were directly observed during the evaluation:

Outfall 200

A. Name and Official Title (type or print)

Larken Pennington  
Environmental Technician

B. Area Code and Telephone No.

870-863-1125

C. Signature

Larken Pennington

D. Date Signed

5/3/12

EL DORADO CHEMICAL COMPANY  
EL DORADO, ARKANSAS  
NON-STORM WATER CERTIFICATION

I, Lariken Pennington, certify that (1) the outfalls and drainage areas covered by Permit No. ARR000000 have been evaluated for the presence of non-storm water discharges, (2) that non-storm water discharges from these outfalls, and drainage areas if applicable, are identified in the SWPPP, and (3) that no non-storm water discharges are made via the outfalls covered by the permit other than those non-storm water discharges authorized and identified in the SWPPP.

Date of evaluation: 5/3/12

Description of the evaluation criteria or testing method used:

no flow

List of the outfalls that were directly observed during the evaluation:

Outfall 300

A. Name and Official Title (type or print)

Lariken Pennington  
Environmental Technician

B. Area Code and Telephone No.

870-863-1125

C. Signature

Lariken Pennington

D. Date Signed

5/3/12

EL DORADO CHEMICAL COMPANY  
EL DORADO, ARKANSAS  
NON-STORM WATER CERTIFICATION

I, Carlen Pennington, certify that (1) the outfalls and drainage areas covered by Permit No. ARR000000 have been evaluated for the presence of non-storm water discharges, (2) that non-storm water discharges from these outfalls, and drainage areas if applicable, are identified in the SWPPP, and (3) that no non-storm water discharges are made via the outfalls covered by the permit other than those non-storm water discharges authorized and identified in the SWPPP.

Date of evaluation: 5/3/12

Description of the evaluation criteria or testing method used:

no flow

List of the outfalls that were directly observed during the evaluation:

Outfall 400

A. Name and Official Title (type or print) <u>Carlen Pennington</u> <u>Environmental Technician</u>	B. Area Code and Telephone No. <u>870-863-1125</u>
C. Signature <u>Carlen Pennington</u>	D. Date Signed <u>5/3/12</u>



EL DORADO CHEMICAL COMPANY  
EL DORADO, ARKANSAS  
NON-STORM WATER CERTIFICATION

I, Larken Pennington, certify that (1) the outfalls and drainage areas covered by Permit No. ARR000000 have been evaluated for the presence of non-storm water discharges, (2) that non-storm water discharges from these outfalls, and drainage areas if applicable, are identified in the SWPPP, and (3) that no non-storm water discharges are made via the outfalls covered by the permit other than those non-storm water discharges authorized and identified in the SWPPP.

Date of evaluation: 5/3/12

Description of the evaluation criteria or testing method used:

Very small flow caused by a leaking valve (can only be replaced if power is out across the plant)

List of the outfalls that were directly observed during the evaluation:

Outfall 500

A. Name and Official Title (type or print)

Larken Pennington  
Environmental Technician

B. Area Code and Telephone No.

870-863-1125

C. Signature

Larken Pennington

D. Date Signed

5/3/12

**El Dorado Chemical Company, Permit Number: AR0000752**



**Concrete washout removal, Southwest side of property, Item #5, June 15, 2012**



**Concrete washout removal, Southwest side of property, Item #5, June 15, 2012**



Concrete washout removal, Southwest side of property, Item #5, June 15, 2012



Designated Concrete Washout Area, June 15, 2012

El Dorado Chemical Company, Permit Number: AR0000752



Designated Concrete Washout Area, June 15, 2012

# ADEQ

ARKANSAS  
Department of Environmental Quality

June 19, 2012

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

AFIN: 70-00040

NPDES Permit No.: AR0000752

Dear Greg Withrow:

I have reviewed the response pertaining to my 5/2/2012 inspection of the EDCC facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 870-862-0680 or you may e-mail me at [lambj@adeq.state.ar.us](mailto:lambj@adeq.state.ar.us).

Sincerely,



John W. Lamb  
District 8 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch