

ADEQ

ARKANSAS
Department of Environmental Quality

June 16, 2014

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

RE: El Dorado Chemical Company Inspection (Union Co)
AFIN: 70-00040 NPDES Permit No.: AR0000752
ARR154223

Dear Mr. Withrow:

On May 28, 2014 and June 4, 2014, I performed a Compliance Evaluation Inspection and Construction Stormwater Inspection of the above referenced 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. Copies of the inspection reports are enclosed for your records.


Please refer to the “Summary of Findings” sections of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to 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 30, 2014**.

If I can be of any assistance, please contact me at youngm@adeq.state.ar.us or (501) 837-2073.

Sincerely,




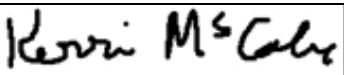
Michael Young
District 8 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT					
		AFIN: 70-00040		PERMIT #: AR0000752		DATE: 5/28/2014	
		COUNTY: 70 Union			PDS #: 078303		MEDIA: W
GPS LAT: 33.263857 LONG: -92.684743 LOCATION: General Area							
FACILITY INFORMATION				INSPECTION INFORMATION			
NAME: El Dorado Chemical Company LOCATION: 4500 North West Ave CITY: El Dorado, AR 71730				FACILITY TYPE: 2 - Industrial		INSPECTOR ID#: 101531 S - State	
RESPONSIBLE OFFICIAL NAME / TITLE: Greg Withrow / General Manager COMPANY: El Dorado Chemical Company, Inc. MAILING ADDRESS: P.O. Box 231 CITY, STATE, ZIP: El Dorado AR 71731 PHONE & EXT: / FAX: 870-863-1400 / EMAIL:				FACILITY EVALUATION RATING: 4 - Satisfactory		INSPECTION TYPE: Compliance Evaluation	
				DATE(S): 5/28/2014	ENTRY TIME: 09:05	EXIT TIME: 15:36	PERMIT EFFECTIVE DATE: 6/1/2004 PERMIT EXPIRATION DATE: 6/30/2007
CONTACTED DURING INSPECTION: Yes				FAYETTEVILLE SHALE RELATED: N			
				FAYETTEVILLE SHALE VIOLATIONS: N			
				INSPECTION PARTICIPANTS			
				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: David Sartain/Environmental Technician/870-863-1403 Barry Rowe/EDCC Kerri McCabe/ADEQ Inspector Supervisor			
AREA EVALUATIONS							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)							
S	PERMIT	S	FLOW MEASUREMENT	S	STORMWATER		
M	RECORDS/REPORTS	S	LABORATORY	M	FACILITY SITE REVIEW		
S	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM		
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT		
**	OTHER:						
SUMMARY OF FINDINGS							
Facility is operating off of an expired permit (expired 04/01/2007); however, they have applied for a new permit and are awaiting draft approval.							
1.) Steam and condensate lines were not indicated on SWPPP site map and are locations of non-stormwater discharge (see Photo 1). This is a violation of permit condition Part III. (15.) (2.) (a.) (iii.) (h.).							
2.) January 2013 TSS Mass Loading monthly average incorrectly calculated (see Page 9). This is a violation of permit condition Part IA.							
3.) Bio-Analytic Laboratories, who is completing the WET testing for Outfalls 006 and 007, is using dilution of 42% instead of the permitted 45%. This is a violation of permit condition Part III. (18.) (1.) (a.).							

GENERAL COMMENTS

Several recommendations were made to the facility at the time of inspection. These included:

- Outfalls 6 and 7 have Parshall flumes, but when the effluent is very low (which is a majority of the time at these stormwater outfalls), the amount is below the measurement device (staff gage) for the flume. Permit conditions for monitoring flow at Outfalls 006 and 007 is estimated flow. It is recommended that the facility use a graduated cylinder or bucket and a stopwatch to estimate the flow. This prompted a discussion about analysis on parameters in the permit for stormwater, and I suggested the facility needs to contact Permits Branch to discuss concerns of conducting the appropriate analysis.
- Calibration logs for pH and dissolved oxygen needs more info. pH calibration logs need the initial reading, calibrated reading and efficiency slope. Dissolved oxygen calibration logs need time, date, and readings in mg/L. It is also recommended that the facility keep a maintenance log for the meters.
- The information discussed during the CEI needs to be evaluated by the Permits Branch prior to the approval and the awaiting permit.

INSPECTOR'S SIGNATURE:  Michael D. Young	DATE: 06/05/2014
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 6/16/2014

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
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	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>TSS Jan 2013 DMR mass loading incorrect.</u>	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input type="checkbox"/> Y <input checked="" 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 checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input 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	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input 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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input 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 type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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 checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
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 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 checked="" type="checkbox"/> Y <input 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 type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E1: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: OUTFALL 003 is ESTIMATED flow.	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:___ TYPE OF DEVICE: <u>NONE</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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 type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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 type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E2: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: OUTFALL 006 is ESTIMATED flow.	
10. 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
11. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
14. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
15. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
16. 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
17. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
18. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E3: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: OUTFALL 007 is ESTIMATED flow.	
19. 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
20. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
21. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
22. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
23. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
24. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
25. 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
26. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
27. 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	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input 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 (6&7), Ameri-Interplex (10), Bio-Analytic (WET)</u>	
b. LAB ADDRESS: <u>Little Rock, Little Rock, Doyline, LA</u>	
c. PARAMETERS PERFORMED: <u>all but pH, D.O. and Temperature</u>	
8. BIOMONITORING PROCEDURES ADEQUATE: <u>Bio-analytic is using 42% instead of 45% dilution.</u>	<input type="checkbox"/> Y <input checked="" 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 type="checkbox"/> Y <input checked="" 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						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
003	N	N	N	N	N	Colorless	--
006	N	N	N	Y	N	Colorless	Foam not persistent
007	N	N	N	Y	N	Colorless	Foam not persistent
010	--	--	--	--	--	--	El Dorado Pipeline AR0050296
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> 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						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE: <u>1/1/2014</u>						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	

DMR Calculation Check

Reporting Period: From 2013 10 01 To 2013 10 31
 Year Month Day Year Month Day

Parameter Checked: NH3-N at
OUTFALL
010

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>26.3</u>	<u>N/A</u>	<u>N/A</u>
Calculated Value:	<u>26.3</u>	<u>N/A</u>	<u>N/A</u>
Permit Value:	<u>265.2</u>	<u>N/A</u>	<u>N/A</u>

If calculated value does not equal reported value, explain:

Equal. Outfall 010 is El Dorado Drainage Pipeline Permit # AR0050296

DMR Calculation Check

Reporting Period: From 2013 01 01 To 2013 01 31
 Year Month Day Year Month Day

Parameter Checked: TSS at
OUTFALL
001

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>120.17</u>	<u>6.35</u>	<u>12</u>
Calculated Value:	<u>55.2</u>	<u>6.35</u>	<u>12</u>
Permit Value:	<u>462</u>	<u>30</u>	<u>45</u>

If calculated value does not equal reported value, explain:

Loading mass differences are because the lab analysis data sheet had both 1/15/13 and 1/16/13 on the same page and may have been missed. 1/15/2013 TSS lab result was 5.0 mg/L and 1/16/13 was 6.0 mg/L, the facility had keyed 1/15/2013 as 6.0 mg/L and had no data recorded for 1/16/2013. Also, the analysis data from January 28, 2013 was not included in the flow weighted average on the facility's spreadsheet. This error also indicates that Mass Loading calculations for NH3-N and NO3 are not correct for January 2013 DMR as well. It is strongly recommended the facility examine old spreadsheets for similar errors and contact Enforcement Branch to do a batch correction on submitted DMRs.

January 2013 DMR had 1 exceedance for TDS at Outfall 001, 2 exceedances for Zinc and TDS at Outfall 006 and 3 exceedances for Zinc, Lead, and TDS at Outfall 007. Ongoing occurrences of Lead and Zinc exceedances at Outfalls 006 and 007 need to be addressed.

Water Division Photographic Evidence Sheet

Location:	El Dorado Chemical Company				
Photographer:	Michael Young	Date:	05/28/2014	Time:	10:13
Witness:	David Sartain; Barry Rowe; Kerri McCabe			Photo #:	1
Description:	Steam lines that are not indicated in SWPPP as non-stormwater source.				





CHEMICAL COMPANY

June 27, 2014

Mr. Michael Young
District 8 Field Inspector
Water Division Inspection Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: El Dorado Chemical Company Compliance Inspection Response
AFIN: 70-00040
NPDES Permit No. AR0000752 and Permit Tracking No. ARR154223

Dear Mr. Young:

On May 28, 2014 and June 4, 2014, ADEQ conducted a routine compliance evaluation inspection at El Dorado Chemical Company (EDCC). A copy of this compliance inspection report and letter dated July 16, 2014 was received by EDCC on June 17, 2014. The inspection report listed three findings associated with NPDES Permit No. AR0000752 and two findings associated with General Permit Tracking No. ARR154223. The letter also requested that a written response to the findings including corrective actions be submitted by June 30, 2014. EDCC's responses are as follows:

NPDES Permit No. AR0000752:

ADEQ Finding No. 1:

Steam and condensate lines were not indicated on SWPPP site map and are locations of non-storm water discharge.

EDCC Response:

The portion of the facility that contains the steam and condensate lines is within the NPDES Outfall 001 drainage basin. Contaminated storm water and process water from the NPDES Outfall 001 drainage basin drains to the "Day Pond" and then to Lake Kildeer where it receives biological treatment. Outfall 001 is not a storm water

only outfall. Thus water related to ancillary operations (i.e. steam and condensate) is considered part of the process wastewater and not a non-stormwater discharge.

However, to address the issue of non-stormwater discharges in stormwater only outfalls, a note has been added to the site map. Due to the scale of the map the number of potential non-stormwater discharges (i.e. air conditioner condensate), it is not feasible to identify the specific location of all non-storm water discharges. See **Attachment 1**.

ADEQ Finding No. 2:

The Total Suspended Solids (TSS) monthly average mass loading was incorrectly calculated for January 2013.

EDCC Response:

The DMR calculation spreadsheet for January 2013 was reviewed. TSS concentration data for January 16, 2013 was missing. Also, the formula for calculating the daily mass loading for TSS, Ammonia-Nitrogen, and Nitrate-Nitrogen was missing for January 28th and the mass loading for the 28th was not included in the monthly average mass loading calculation. The DMR calculation spreadsheet has been revised to include the missing information. The DMR's for January 2013 have been corrected and the revised pages were submitted to the Enforcement section of the Water Division on June 27, 2014. See **Attachment 2**.

ADEQ Finding No. 3:

Bio-Analytical Laboratories, who is completing the WET testing for Outfalls 006 and 007, is using dilution of 42% instead of the permitted 45%.

EDCC Response:

The current permit was modified June 1, 2004 and April 1, 2007. The dilution series in the most recent modification (April 1, 2007) contains the following dilution series for Outfalls 006 and 007: 100%, 75%, 56%, 45%, and 32%. The dilution series was not part of the modification and was supposed to remain unchanged. However, the dilution series in the June 1, 2004 modification is as follows: 100%, 75%, 56%, 42%, and 32%.

EDCC believes that the 45% in the current permit was a typo that occurred during the last modification. ADEQ's CPP document which is to be used in permits has a table identifying the dilution series based on the applied critical dilution. The 0.75 dilution series chart (Attachment 1 of Appendix D of the CPP) lists the dilution series for 100% critical dilution as 100%, 75%, 56%, 42%, and 32% dilutions. There is no regulatory basis for the 45% required by the permit. It should be the 42% of the CPP table, which is the same as utilized by the contract lab.

Until the issue can be resolved with the Permits Section, EDCC will inform the contract laboratory to perform all future WET testing at the following dilution series: 100%, 75%, 56%, 45%, and 32%.

ADEQ Recommendations:

The inspection report also contained several recommendations made by the inspector regarding flow measurement at Outfalls 006 and 007 and information on calibration and maintenance logs.

EDCC Response:

EDCC will review the recommendations and take appropriate actions, if deemed necessary.

General Permit Tracking No. ARR154223:

ADEQ Finding No. 1:

The facility site map in the construction SWPPP did not indicate locations of all surface water bodies (including wetlands).

EDCC Response:

Except for the Day Pond, which is a manmade flow equalization structure that is part of the wastewater treatment system, there are not any surface water bodies or wetlands within the confines of the construction boundaries. The construction boundary for EDCC is the fenced manufacturing area. The site map has been revised to show the construction boundary. Also, a note has been added to include the receiving streams for all outfalls. An example of the revised map showing these revisions can be found in **Attachment 3**.

ADEQ Finding No. 2:

Silt fencing was not properly installed and maintained.

EDCC Response:

The silt fence that was noted in the inspection report has been repaired, replaced or removed. The contractor responsible for maintaining BMP's related to construction has been made aware of the issues. Pictures showing the above described corrective actions can be found in **Attachment 4**.

We appreciate ADEQ's concerns in this matter. We trust our responses satisfy the inspection findings. Please do not hesitate to contact David Sartain at (870) 863-1400 should you have any questions or need additional information regarding this issue.

Respectfully submitted,
El Dorado Chemical Company

A handwritten signature in cursive script that reads "Greg Withrow".

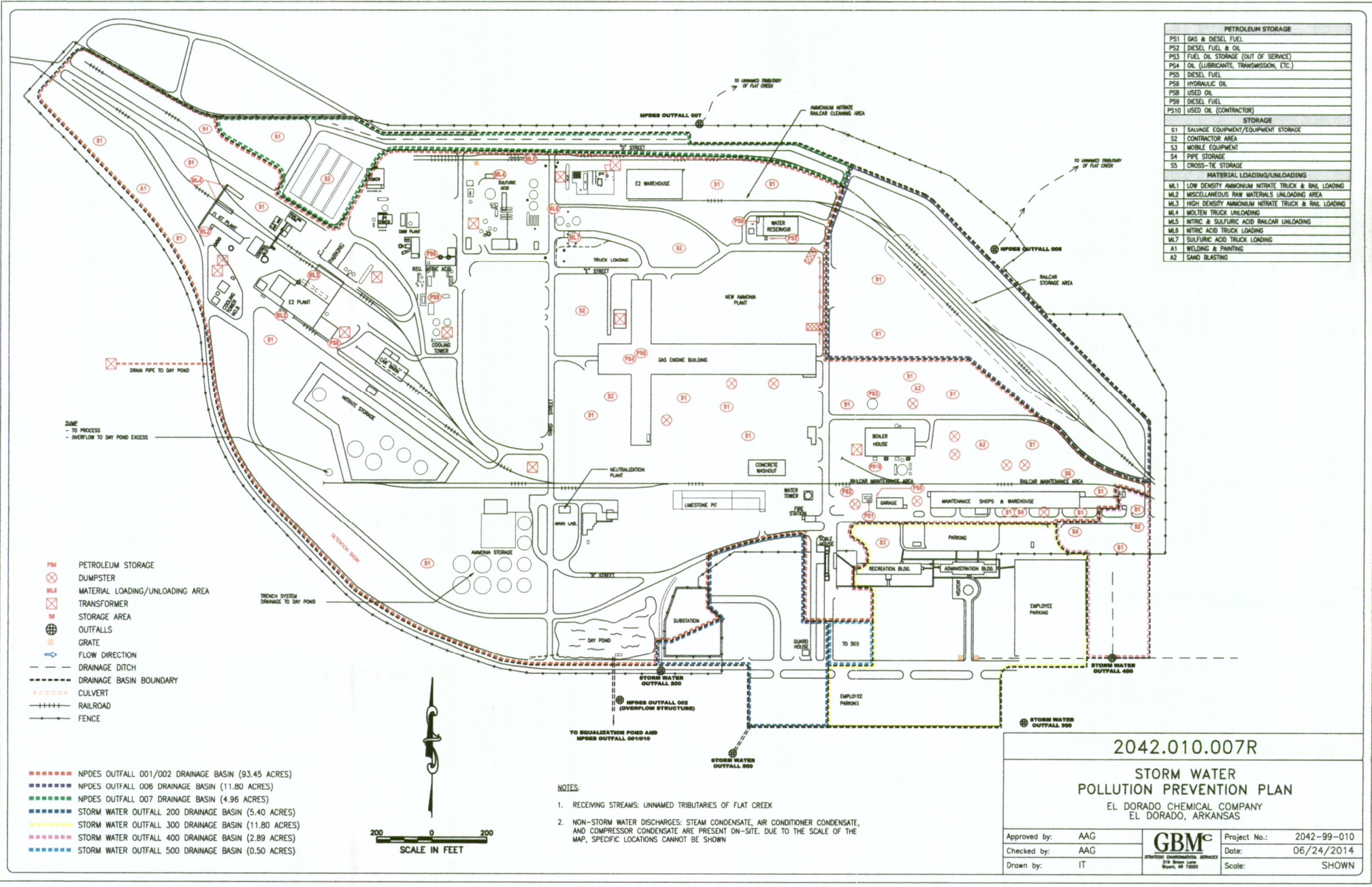
Greg Withrow
General Manager

Attachment

cc: Amanda Gallagher – GBM^c & Associates

Attachment 1

Industrial Storm Water SWPPP Site Map



PETROLEUM STORAGE	
PS1	GAS & DIESEL FUEL
PS2	DIESEL FUEL & OIL
PS3	FUEL OIL STORAGE (OUT OF SERVICE)
PS4	OIL (LUBRICANTS, TRANSMISSION, ETC.)
PS5	DIESEL FUEL
PS6	HYDRAULIC OIL
PS8	USED OIL
PS9	DIESEL FUEL
PS10	USED OIL (CONTRACTOR)
STORAGE	
S1	SALVAGE EQUIPMENT/EQUIPMENT STORAGE
S2	CONTRACTOR AREA
S3	MOBILE EQUIPMENT
S4	PIPE STORAGE
S5	CROSS-TIE STORAGE
MATERIAL LOADING/UNLOADING	
M1.1	LOW DENSITY AMMONIUM NITRATE TRUCK & RAIL LOADING
M1.2	MISCELLANEOUS RAW MATERIALS UNLOADING AREA
M1.3	HIGH DENSITY AMMONIUM NITRATE TRUCK & RAIL LOADING
M1.4	MOLTEN TRUCK UNLOADING
M1.5	NITRIC & SULFURIC ACID RAILCAR UNLOADING
M1.6	NITRIC ACID TRUCK LOADING
M1.7	SULFURIC ACID TRUCK LOADING
OTHER	
A1	WELDING & PAINTING
A2	SAND BLASTING

- PS# PETROLEUM STORAGE
 - ⊗ DUMPSTER
 - M# MATERIAL LOADING/UNLOADING AREA
 - ⊠ TRANSFORMER
 - ⊞ STORAGE AREA
 - ⊕ OUTFALLS
 - ⊞ GRATE
 - FLOW DIRECTION
 - - - DRAINAGE DITCH
 - - - DRAINAGE BASIN BOUNDARY
 - - - CULVERT
 - ++++ RAILROAD
 - FENCE
-
- NPDES OUTFALL 001/002 DRAINAGE BASIN (93.45 ACRES)
 - NPDES OUTFALL 006 DRAINAGE BASIN (11.80 ACRES)
 - NPDES OUTFALL 007 DRAINAGE BASIN (4.96 ACRES)
 - STORM WATER OUTFALL 200 DRAINAGE BASIN (5.40 ACRES)
 - STORM WATER OUTFALL 300 DRAINAGE BASIN (11.80 ACRES)
 - STORM WATER OUTFALL 400 DRAINAGE BASIN (2.89 ACRES)
 - STORM WATER OUTFALL 500 DRAINAGE BASIN (0.50 ACRES)

NOTES:

- RECEIVING STREAMS: UNNAMED TRIBUTARIES OF FLAT CREEK
- NON-STORM WATER DISCHARGES: STEAM CONDENSATE, AIR CONDITIONER CONDENSATE, AND COMPRESSOR CONDENSATE ARE PRESENT ON-SITE. DUE TO THE SCALE OF THE MAP, SPECIFIC LOCATIONS CANNOT BE SHOWN

2042.010.007R

**STORM WATER
POLLUTION PREVENTION PLAN**
EL DORADO CHEMICAL COMPANY
EL DORADO, ARKANSAS

Approved by: AAG	GBM <small>STRATEGIC ENVIRONMENTAL SERVICES 210 BRIDGE LANE EL DORADO, AR 72025</small>	Project No.: 2042-99-010
Checked by: AAG		Date: 06/24/2014
Drawn by: IT		Scale: SHOWN

Attachment 2

Revised DMR pages for January 2013



CHEMICAL COMPANY

June 26, 2014

Arkansas Department of Environmental Quality
ADEQ Water Division – NPDES Enforcement Section
Attention: Enforcement Administrator
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: NPDES Permit No. ARR0000752 – El Dorado Chemical Corporation
Revised January 2013 Discharge Monitoring Report

To Whom It May Concern:

Please find enclosed revised Discharge Monitoring Report Page for the above referenced permit for the January 2013. Total Suspended Solids (monthly average loading and concentration), Ammonia-Nitrogen (monthly average loading), and Nitrate-Nitrogen (monthly average loading) were miscalculated in the Discharge Monitoring Report submitted in February 2013.

Data for Total Suspended Solids was not entered in the DMR calculation excel spreadsheet for January 15, 2013. Also, the formula to calculate the daily mass loading for Total Suspended Solids, Ammonia-Nitrogen, and Nitrate-Nitrogen was missing for January 28, 2013. These issues resulted in the calculated values for the above mentioned parameters being inaccurate.

We appreciate your attention in this matter. Please do not hesitate to contact Barry Rowe at (870) 863-1400 if you have any questions or need additional information.

Respectfully Submitted,
El Dorado Chemical Corporation

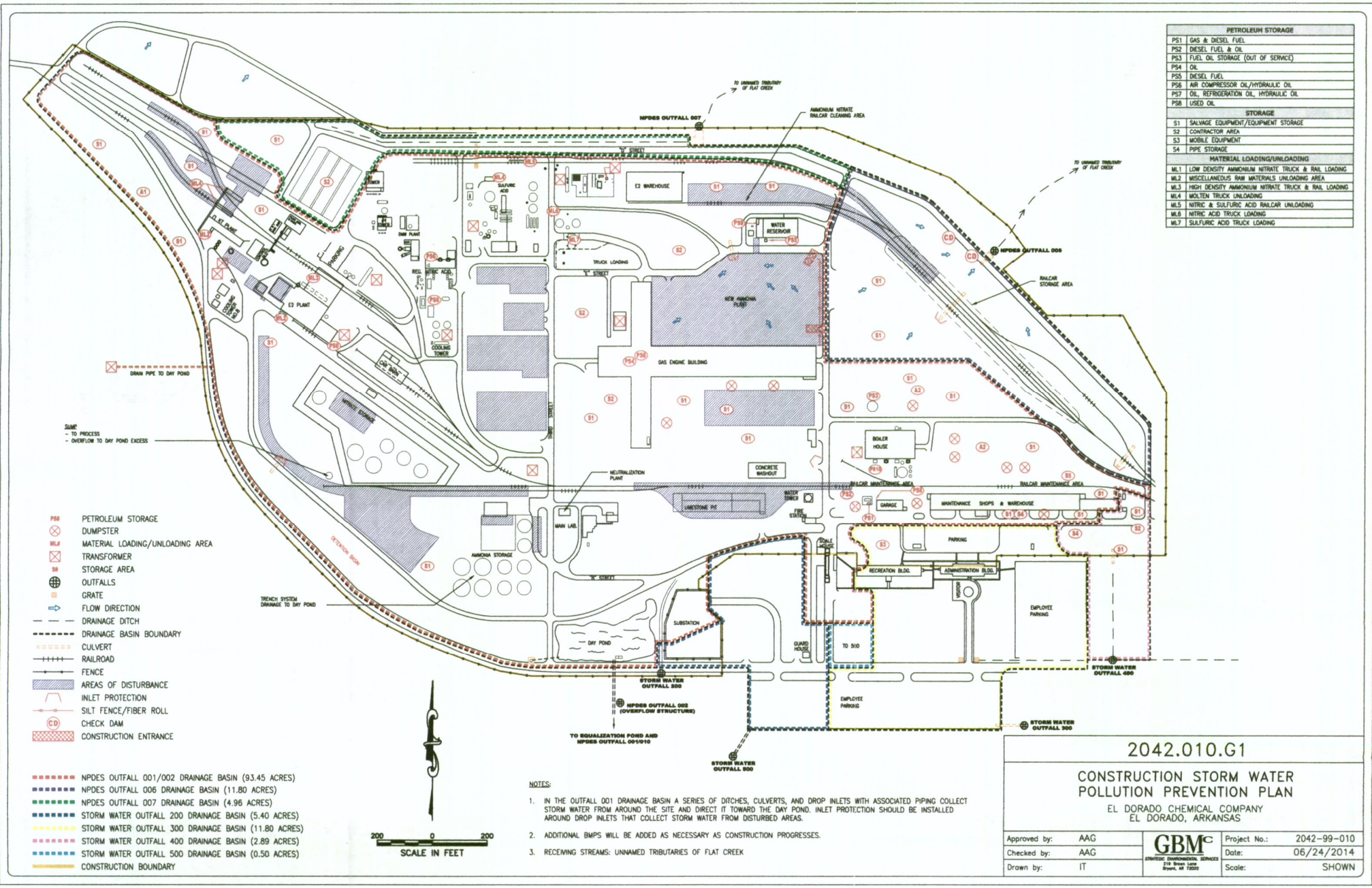
A handwritten signature in black ink that reads "Greg Withrow". The signature is written in a cursive, flowing style.

Greg Withrow
General Manager

Enclosure

Attachment 3

Construction Storm Water SWPPP Site Map



PETROLEUM STORAGE	
PS1	GAS & DIESEL FUEL
PS2	DIESEL FUEL & OIL
PS3	FUEL OIL STORAGE (OUT OF SERVICE)
PS4	OIL
PS5	DIESEL FUEL
PS6	AIR COMPRESSOR OIL/HYDRAULIC OIL
PS7	OIL REFRIGERATION OIL/HYDRAULIC OIL
PS8	USED OIL
STORAGE	
S1	SCRAP EQUIPMENT/EQUIPMENT STORAGE
S2	CONTRACTOR AREA
S3	MOBILE EQUIPMENT
S4	PIPE STORAGE
MATERIAL LOADING/UNLOADING	
ML1	LOW DENSITY AMMONIUM NITRATE TRUCK & RAIL LOADING
ML2	MISCELLANEOUS RAW MATERIALS UNLOADING AREA
ML3	HIGH DENSITY AMMONIUM NITRATE TRUCK & RAIL LOADING
ML4	MOLTEN TRUCK UNLOADING
ML5	NITRIC & SULFURIC ACID RAILCAR UNLOADING
ML6	NITRIC ACID TRUCK LOADING
ML7	SULFURIC ACID TRUCK LOADING

- PSB PETROLEUM STORAGE
- DUMPSTER
- MLF MATERIAL LOADING/UNLOADING AREA
- TRANSFORMER
- STORAGE AREA
- OUTFALLS
- GRATE
- FLOW DIRECTION
- DRAINAGE DITCH
- DRAINAGE BASIN BOUNDARY
- CULVERT
- RAILROAD
- FENCE
- AREAS OF DISTURBANCE
- INLET PROTECTION
- SILT FENCE/FIBER ROLL
- CHECK DAM
- CONSTRUCTION ENTRANCE

- NPDES OUTFALL 001/002 DRAINAGE BASIN (93.45 ACRES)
- NPDES OUTFALL 006 DRAINAGE BASIN (11.80 ACRES)
- NPDES OUTFALL 007 DRAINAGE BASIN (4.96 ACRES)
- STORM WATER OUTFALL 200 DRAINAGE BASIN (5.40 ACRES)
- STORM WATER OUTFALL 300 DRAINAGE BASIN (11.80 ACRES)
- STORM WATER OUTFALL 400 DRAINAGE BASIN (2.89 ACRES)
- STORM WATER OUTFALL 500 DRAINAGE BASIN (0.50 ACRES)
- CONSTRUCTION BOUNDARY



- NOTES:**
1. IN THE OUTFALL 001 DRAINAGE BASIN A SERIES OF DITCHES, CULVERTS, AND DROP INLETS WITH ASSOCIATED PIPING COLLECT STORM WATER FROM AROUND THE SITE AND DIRECT IT TOWARD THE DRY POND. INLET PROTECTION SHOULD BE INSTALLED AROUND DROP INLETS THAT COLLECT STORM WATER FROM DISTURBED AREAS.
 2. ADDITIONAL BMPs WILL BE ADDED AS NECESSARY AS CONSTRUCTION PROGRESSES.
 3. RECEIVING STREAMS: UNNAMED TRIBUTARIES OF FLAT CREEK

2042.010.G1

CONSTRUCTION STORM WATER POLLUTION PREVENTION PLAN

EL DORADO CHEMICAL COMPANY
EL DORADO, ARKANSAS

Approved by: AAG	GBM STRATEGIC ENVIRONMENTAL SERVICES 210 BRIDGE LANE DORADO, AR 70020	Project No.: 2042-99-010
Checked by: AAG		Date: 06/24/2014
Drawn by: IT		Scale: SHOWN

Attachment 4

BMP Photos

Photograph 1 of the compliance inspection showed the silt fence at the entrance to the new ammonia plant was not being maintained. The silt fence has been repaired as shown in the photograph below.



EDCC area referenced in ADEQ photo # 1. Silt fence has been repaired.

Photograph 2 of the compliance inspection showed silt fence had been installed in the road ditch. The silt fence was not being maintained and it was damming up water in the ditch. After review of site conditions and the site map, EDCC determined that the use of silt fence in the road ditch was not necessary. Other BMP's that are currently installed is sufficient to minimize the amount of sediment leaving the site. Thus, the silt fence has been removed as shown in the photograph below.



EDCC area referenced in ADEQ photo # 2. Silt fence has been removed along the ditch.

Photograph 3 of the compliance inspection showed silt fence had been improperly installed directly upstream of a culvert. After review of the SWPPP and site map, EDCC determined that the use of silt fence at this location was not necessary. The area upstream of the culvert is a vegetated area. Any planned disturbance is minimal and other BMP's that are currently installed are sufficient to retain any sediment on-site. Thus, the silt fence has been removed as shown in the photograph below.



EDCC area referenced in ADEQ photo # 3. Silt fence has been removed.

Photograph 4 of the compliance inspection showed silt fence had been improperly installed directly downstream of the culvert. After review of site conditions and the site map, EDCC determined that the use of silt fence downstream of the culvert was not necessary. The area drained by the culvert has minimal disturbance and other BMP's that are currently installed are sufficient to retain any sediment on-site. Thus, the silt fence has been removed as shown in the photograph below.



EDCC area referenced in ADEQ photo # 4. Silt fence has been removed.

From: (870) 863-1121
 Barry Rowe
 El Dorado Chemical Co.
 P. O. Box 231

Origin ID: ELDA



J14101402070306

El Dorado, AR 71730

Ship Date: 27JUN14
 ActWgt: 0.5 LB
 CAD: 5887030/INET3490

Delivery Address Bar Code



SHIP TO: (501) 682-0744

BILL SENDER

Michael Young
 Arkansas Dept. of Environ. Quality
 5301 Northshore Drive

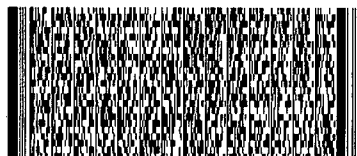
North Little Rock, AR 72118

Ref #
 Invoice #
 PO #
 Dept #

TUE - 01 JUL 10:30A
 MORNING 2DAY

TRK# 7704 4785 9590
 0201

72118
 AR-US
 LIT



SA LITA



52205/68C4/F220

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ADEQ

A R K A N S A S
Department of Environmental Quality

July 7, 2014

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

RE: Response to Inspection (Union Co)
AFIN: 70-00040 **NPDES Permit No.: AR0000752**
ARR154223

Dear Mr. Withrow:

I have reviewed the response pertaining to my May 28, 2014 and June 4, 2014 inspections of El Dorado Chemical Company, Inc. 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 (501) 837-2073 or you may e-mail me at youngm@adeq.state.ar.us.

Sincerely,



Michael D. Young
District 8 Field Inspector
Water Division