

 <b>A R K A N S A S</b> Department of Environmental Quality	<b>WATER DIVISION INSPECTION REPORT</b>				
	AFIN: <b>70-00040</b>	PERMIT #: <b>ARR154223</b>	DATE: <b>6/4/2014</b>		
	COUNTY: <b>70 Union</b>	PDS #: <b>078304</b>	MEDIA: <b>W</b>		
	GPS LAT: <b>33.263857</b> LONG: <b>-92.684743</b> LOCATION: <b>General Area</b>				
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>			
NAME: <b>El Dorado Chemical Company</b> LOCATION: <b>4500 North West Ave</b> CITY: <b>El Dorado, AR 71730</b>		FACILITY TYPE: <b>2 - Industrial</b> INSPECTOR ID#: <b>101531 S - State</b> FACILITY EVALUATION RATING: <b>4 - Satisfactory</b> INSPECTION TYPE: <b>Construction Stormwater</b>			
<b>RESPONSIBLE OFFICIAL</b>		DATE(S): <b>6/4/2014</b> ENTRY TIME: <b>09:05</b> EXIT TIME: <b>10:42</b> PERMIT EFFECTIVE DATE: <b>8/20/2013</b> PERMIT EXPIRATION DATE: <b>10/31/2016</b>			
NAME / TITLE: <b>Greg Withrow / General Manager</b> COMPANY: <b>El Dorado Chemical Company, Inc.</b> MAILING ADDRESS: <b>P.O. Box 231</b> CITY, STATE, ZIP: <b>El Dorado AR 71731</b> PHONE & EXT. / FAX: <b>870-863-1400 /</b> EMAIL:		FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>			
CONTACTED DURING INSPECTION: <b>No</b>		<b>INSPECTION PARTICIPANTS</b>			
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>David Sartain/Environmental Technician/870-863-1403</b>			
<b>AREA EVALUATIONS</b>					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
<b>S</b>	PERMIT	<b>N</b>	FLOW MEASUREMENT	<b>S</b>	STORMWATER
<b>S</b>	RECORDS/REPORTS	<b>N</b>	LABORATORY	<b>S</b>	FACILITY SITE REVIEW
<b>N</b>	OPERATION & MAINTENANCE	<b>N</b>	EFFLUENT/RECEIVING WATER	<b>S</b>	SELF-MONITORING PROGRAM
<b>N</b>	SAMPLING	<b>N</b>	SLUDGE HANDLING/DISPOSAL	<b>N</b>	PRETREATMENT
<b>S</b>	OTHER: <b>Construction Stormwater</b>				
<b>SUMMARY OF FINDINGS</b>					
1.) Facility site map in construction SWPPP did not indicate locations of all surface waterbodies (including wetlands). This is a violation of permit condition Part II. (A.) (4.) (F.) (9.).					
2.) Silt fencing was not properly installed and maintained (see Photos 1-4). This is a violation of permit condition Part II. (B.) (17.) (A.).					
<b>GENERAL COMMENTS</b>					
INSPECTOR'S SIGNATURE:  <b>Michael D. Young</b>				DATE: <b>06/05/2014</b>	
SUPERVISOR'S SIGNATURE:  <b>Kerri McCabe</b>				DATE: <b>6/16/2014</b>	

<b>SECTION I: SITE POSTING AND SITE INFORMATION</b>	
<b>SITE NAME:</b> Expansion Project	<b>TOTAL ACREAGE:</b> 11 <b>ACREAGE DISTURBED:</b> 11
<b>LATITUDE</b> 33.263857	<b>LONGITUDE</b> -92.684743 <b>STARTING DATE</b> 08/20/2013
A. Is site is posted with Notice Of Coverage (NOC) (Part II, A.2.D)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
B. Is posting at construction entrance and visible to the public (Part II, A.2.D)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
C. If project is linear, is posting at area actively under construction? (Part I,B.8.C)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
D. If project is part of larger common plan of development, what is development name and permit number Development Name: _____ Development Permit No: _____	
<b>SECTION II: STORM WATER POLLUTION PREVENTION PLAN EVALUATION AND IMPLEMENTATION</b>	
A. Is the SWPPP being maintained on site from 08:00 am to 5:00 pm (Part II,A.2.A) Using guidance document with construction plans maintained at site.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
B. Is the SWPPP properly signed as required by Part II,A.2.A of the permit?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
C. Is the SWPPP being updated as required by Part II,A.3 of the permit?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>D. Site map in SWPPP (Part II,A.4.F)</b>	
1) Pre-construction topographic view (Part II,A.4.F.1);	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2) Direction of storm water flow (i.e., use arrows to show which direction storm water will flow) and approximate slopes anticipated after major grading activities (Part II,A.4.F.2);	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Delineate on the site map areas of soil disturbance and areas that will not be disturbed under the coverage of this permit (Part II,A.4.F.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Location of major structural and nonstructural controls identified in the plan (Part II,A.4.F.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Location of main construction entrance and exit (Part II,A.4.F.5)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6) Location where stabilization practices are expected to occur (Part II,A.4.F.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7) Locations of off-site materials, waste, borrow area, or equipment storage area (Part II,A.4.F.7)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8) Location of areas used for concrete wash-out (Part II,A.4.F.8)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9) Location of all surface water bodies (including wetlands) (Part II,A.4.F.9)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10) Locations where storm water is discharged to a surface water and/or municipal separate storm sewer system if applicable (Part II,A.4.F.10)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11) Locations where storm water is discharged off-site (should be continuously updated) (Part II,A.4.F.11)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12) Areas where final stabilization has been accomplished and no further construction phase permit requirements apply (Part II,A.4.F.12)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>E. Stormwater Controls</b>	
1) Are all controls installed as described in the SWPPP (Part II,A.4.G) transitioning silt fence locations due to new phase (STAA).	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2) Silt fences properly installed and maintained (Part II,B.17.A)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Check dams and velocity dissipation devices properly installed and maintained (Part II,B.17.A)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Sedimentation basins and sediment traps properly installed and maintained (sediment removed when 50% capacity) (Part II,B.17.A) and (Part II,A.4.G.1.e)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5) Has sediment that has gotten offsite been removed? (Part II,A.4.G.1.d)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6) Is construction site entrance sufficiently stabilized to prevent off site tracking? (Part II,A.4.H.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7) Are stabilization methods described in SWPPP being implemented in a timely manner? (Part II,A.4.G.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

<b>F. Inspections</b>	
1) Inspection Frequency in SWPPP – <input checked="" type="checkbox"/> <b>Once every 7 days</b> <input type="checkbox"/> <b>14 days and after ½ inch rain event</b>	
1a) If inspection frequency is every 14 days, do they have a rain gauge on site? ( <i>Part II,A.4.L.1.b</i> )	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
1b) Is rain gauge properly installed? (nothing obstructing rain gauge) ( <i>Part II,B.17.A</i> )	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2) Are inspection records being maintained on site? ( <i>Part II,A.4.L.3</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Are ADEQ inspection forms being used or do the forms contain the elements required by the permit? ( <i>Part II,A.4.L.2</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3a) Inspector Name and Title ( <i>Part II,A.4.L.2.a</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3b) Date of Inspection ( <i>Part II,A.4.L.2.b</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3c) Amount of Rainfall and Days Since Last Rain Event (only if inspection frequency is 14 days) ( <i>Part II,A.4.L.2.c</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3d) Approximate beginning and duration of the storm event ( <i>Part II,A.4.L.2.d</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3e) Description of any discharges during inspection ( <i>Part II,A.4.L.2.e</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3f) Locations of discharges of sediment/other pollutants ( <i>Part II,A.4.L.2.f</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3g) Locations of BMPs in need of maintenance or where maintenance was performed ( <i>Part II,A.4.L.2.g</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3h) If the BMPs are in working order and if maintenance is required (when scheduled and completed) ( <i>Part II,A.4.L.2.h</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3i) Locations that are in need of additional controls ( <i>Part II,A.4.L.2.i</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3j) Location and Dates When Major Construction Activities Begin, Occur or Cease ( <i>Part II,A.4.L.2.j</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3k) Report Signature of Inspector ( <i>Part II,A.4.L.2.k</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Are inspections conducted in accordance with the requirements of the SWPPP? ( <i>Part II,A.4.L</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Are corrective actions being implemented within 3 business days? ( <i>Part II,A.4.M</i> ) <i>Pending response.</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>G. Stormwater management</b>	
1) Is solid waste being controlled as described in SWPPP? ( <i>Part II, A.4.H.1</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2) Are stabilized buffer zones being maintained? (25 feet from stream, 50 feet if 303 d, TMDL, ERW, ESW or NSW) ( <i>Part II, A.4.G.2.b</i> ) <i>STAA obtained.</i>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3) Have velocity dissipation devices been installed at discharge points, within concentrated flow areas serving two or more acres and along drainage courses where required to prevent erosive flows ( <i>Part II, A.4.G.3.b</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Has silt or sediment gotten off the construction site? <i>A.C.A. § 8-4-217(a)(2)</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Has silt and sediment been discharged to the waters of the state? <i>A.C.A. § 8-4-217(a)(2)STAA</i>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
If yes, give the name of the stream or water body: _____	
6) Is the washout of concrete being done at the designated location? ( <i>Part II,A.4.G.8</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7) Does the liquid waste from concrete washout reach the waters of the state? ( <i>Part II, A.4.H.5</i> )	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8) Are fuel storage areas protected as described by SWPPP? ( <i>Part II, A.4.H.6</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9) Have temporary erosion controls been removed from areas finally stabilized? ( <i>Part II, A.4.G</i> )	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10) Are there any allowable non-storm water discharges that have not been addressed in the SWPPP ( <i>Part II, A.4.I</i> )	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11) Are there any process waters or non-storm water discharges that are not allowed under the permit being discharged? <i>A.C.A. § 8-4-217(b)(1)(E)</i>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12) Does the SWPPP include the required information about employee training (dates of training,	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

ADEQ Water NPDES Inspection	AFIN:	Permit #:
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records of training, etc.) (Part II,A.4.N)	
E. Comments and Observations:	

**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Chemical Company</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>06/04/2014</b>
Witness:	<b>David Sartain</b>	Time:	<b>10:03</b>
		Photo #:	<b>1</b>
Description:	<b>Entrance of new ammonia plant. Note silt fencing not maintained.</b>		



Photographer:	<b>Michael Young</b>	Date:	<b>06/04/2014</b>
Witness:	<b>David Sartain</b>	Time:	<b>10:04</b>
		Photo #:	<b>2</b>
Description:	<b>Silt fencing installed mid-channel in a ditch. Note silt fencing down and not maintained. Silt fencing in ditch is acting as a dam also.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Chemical Company</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>06/04/2014</b>
Witness:	<b>David Sartain</b>	Time:	<b>10:09</b>
		Photo #:	<b>3</b>
Description:	<b>Silt fencing improperly installed directly upstream of culvert.</b>		



Photographer:	<b>Michael Young</b>	Date:	<b>06/04/2014</b>
Witness:	<b>David Sartain</b>	Time:	<b>10:09</b>
		Photo #:	<b>4</b>
Description:	<b>Silt fencing improperly installed directly downstream of culvert mid-channel.</b>		





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 28<sup>th</sup> and the mass loading for the 28<sup>th</sup> 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

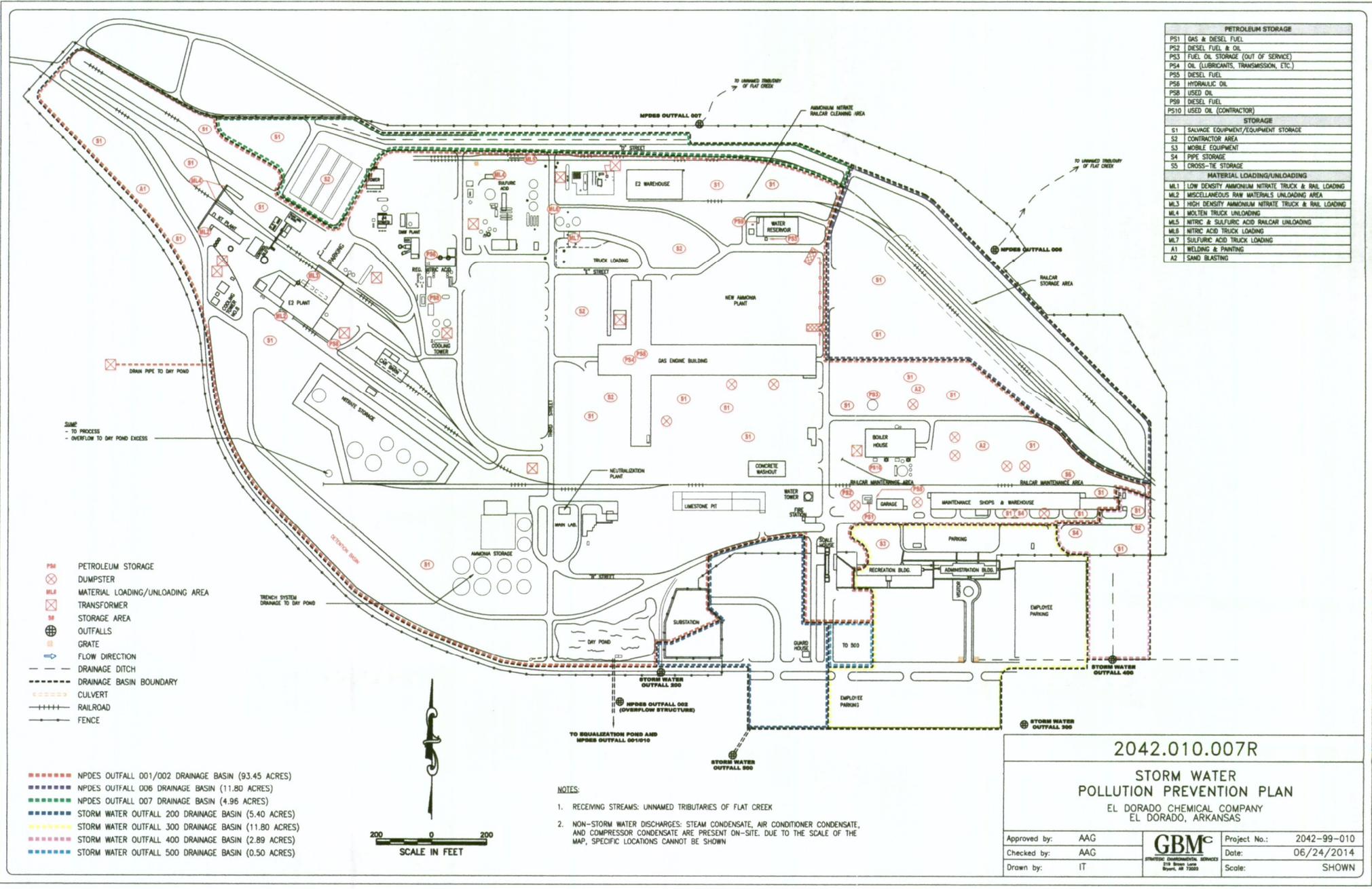
Attachment

cc: Amanda Gallagher – GBM<sup>c</sup> & Associates

## **Attachment 1**

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# **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	
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
A1	WELDING & PAINTING
A2	SAND BLASTING

- PS# PETROLEUM STORAGE
- ⊗ DUMPSTER
- ML# MATERIAL LOADING/UNLOADING AREA
- ⊠ TRANSFORMER
- SA STORAGE AREA
- ⊕ OUTFALLS
- GR# 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	<b>GBM</b> <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**

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**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, AR72118-5317

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.

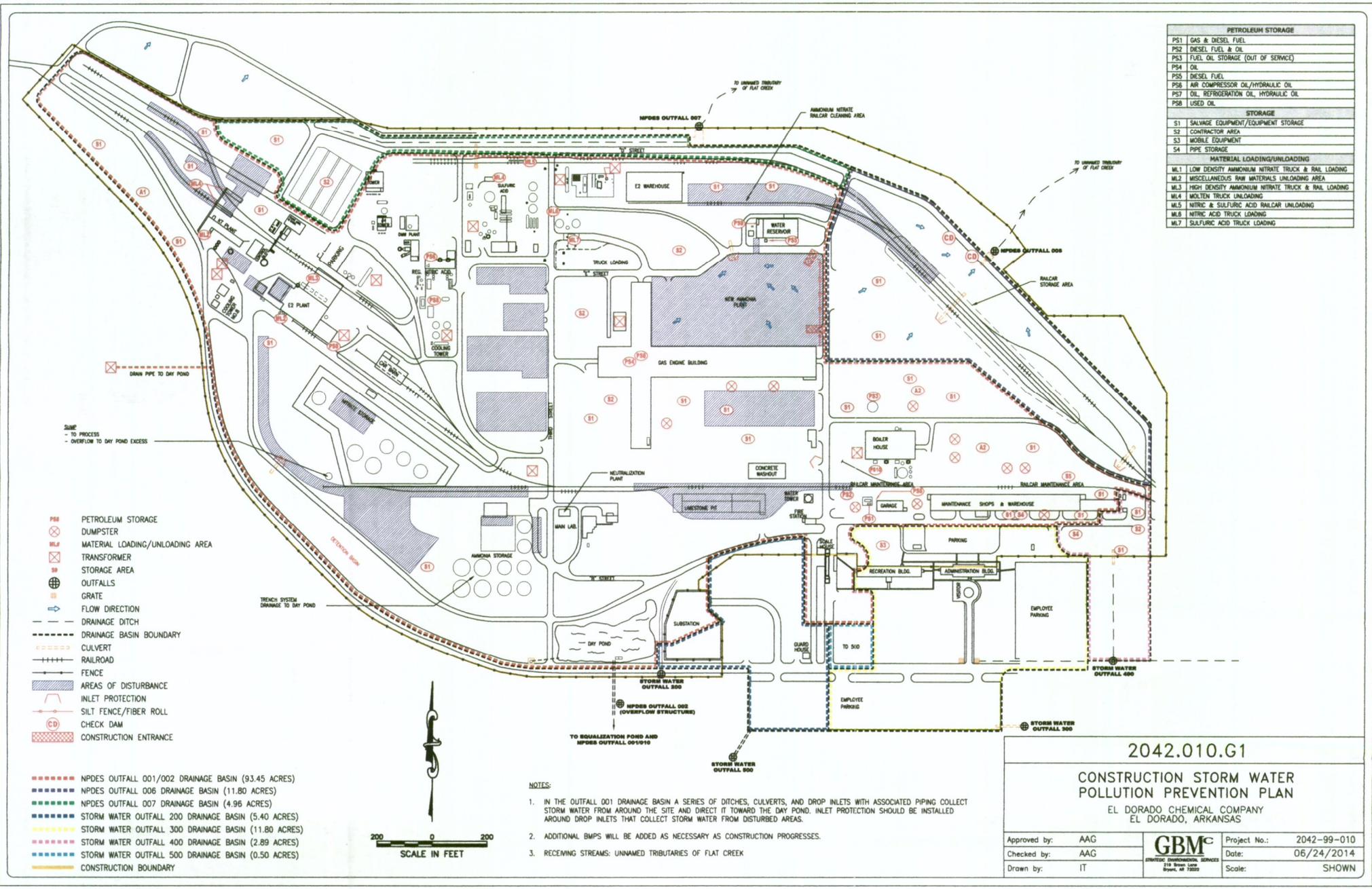
Greg Withrow  
General Manager

Enclosure

**Attachment 3**

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**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	SALVAGE 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:**

- 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.
- ADDITIONAL BMPs WILL BE ADDED AS NECESSARY AS CONSTRUCTION PROGRESSES.
- 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	<b>GBM</b> STRATEGIC ENVIRONMENTAL SERVICES 210 BRICK LANE DORADO, AR 70022	Project No.: 2042-99-010
Checked by: AAG		Date: 06/24/2014
Drawn by: IT		Scale: SHOWN

## **Attachment 4**

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## **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

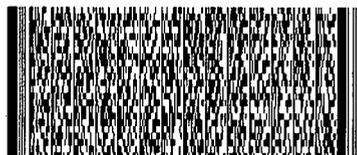
North Little Rock, AR 72118

Ref #  
Invoice #  
PO #  
Dept #

TUE - 01 JUL 10:30A  
MORNING 2DAY

TRK# 7704 4785 9590  
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72118  
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# ADEQ

ARKANSAS  
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](mailto:youngm@adeq.state.ar.us).

Sincerely,



Michael D. Young  
District 8 Field Inspector  
Water Division