ADEQ
ARKANSAS
Department of Environmental Quality

August 27, 2020

Delmar R. Reppond, General Manager
El Dorado Chemical Company
4500 North West Avenue
El Dorado, AR 71730

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

Dear Mr. Reppond:

On August 6, 2020, I performed a Compliance Evaluation 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. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Office of Water Quality (OWQ) Compliance 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 **September 10, 2020**.

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 Inspector
Office of Water Quality

ADEQ
ARKANSAS
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: **70-00040** | PERMIT #: **AR0000752** | DATE: **8/6/2020**

COUNTY: **70 Union** | PDS #: **113144** | MEDIA: **WN**

GPS LAT: **33.264991** LONG: **-92.664671** LOCATION: **Entrance**

FACILITY INFORMATION

NAME:
El Dorado Chemical Company
LOCATION:
4500 North West Avenue
CITY:
El Dorado, AR

RESPONSIBLE OFFICIAL

NAME: / TITLE
Delmar R. Reppond / General Manager
COMPANY:
El Dorado Chemical Company
MAILING ADDRESS:
4500 North West Avenue
CITY, STATE, ZIP:
El Dorado AR 71730
PHONE & EXT: / FAX:
870-863-1400 /
EMAIL:
dreppond@edc-ark.com
CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: **2 - Industrial**
INSPECTOR ID#: **101531 S - State**
FACILITY EVALUATION RATING: **2 - Marginal**
INSPECTION TYPE: **Compliance Evaluation**
DATE(S): **8/6/2020**
ENTRY TIME: **09:50**
EXIT TIME: **12:12**
PERMIT EFFECTIVE DATE: **10/1/2017**
PERMIT EXPIRATION DATE: **9/30/2020**
FAYETTEVILLE SHALE RELATED: **N**
FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
David Sartain/Environmental Coordinator/dsartain@edc-ark.com
Wes Morgan/Environmental Technician
Eddy Sutton/Environmental Technician

AREA EVALUATIONS

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

S	PERMIT	**S**	FLOW MEASUREMENT	**S**	STORMWATER
S	RECORDS/REPORTS	**S**	LABORATORY	**S**	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	**S**	EFFLUENT/RECEIVING WATER	**S**	SELF-MONITORING PROGRAM
S	SAMPLING	**S**	SLUDGE HANDLING/DISPOSAL	**N**	PRETREATMENT
****	OTHER:				

SUMMARY OF FINDINGS

1.) This facility is performing monthly acute Whole Effluent Toxicity (WET) testing at Outfalls 006 and 007. This is a violation of Part IA. The current permit requires chronic WET testing at a frequency of once every two months.

2.) This facility is not performing the Outfall 104ST sum total for Total Recoverable Lead following the six month interim limits at Outfalls 006 and 007. This is a violation of permit condition Part IA.

3.) Vegetation surrounding Lake Lee and Lake Killdeer is excessive. This is a violation of permit condition Part III. (B.) (1.) (A.).

GENERAL COMMENTS

On August 6, 2020, I performed an inspection at El Dorado Chemical Company (EDCC) with the above participants. EDCC manufactures a variety of agrochemical and industrial products including regular nitric acid and concentrated nitric acid, mixed (nitrating) acids, sulfuric acid, and both agricultural and industrial grade ammonium nitrate. There are a total of six permitted outfalls at EDCC, of which four outfalls are utilized and two are reserved in the instance of an emergency discharge. Outfalls 001 and 010 are permitted to discharge treated process wastewater, Outfall 003 is permitted to discharge treated sanitary wastewater, and Outfalls 006 and 007 are permitted to discharge contaminated stormwater. Outfalls 006 and 007 have no treatment. Outfall 003 has a treatment system consisting of a bar screen, Imhoff tanks, sand filter beds, and a discharge through a manufactured flume. Outfall 010 has a treatment system consisting of pH adjustment in a spray aerated lagoon (Lake Lee) to a ~50 acre facultative lagoon with water recirculation and aeration. This inspection consisted of a records review and facility inspection.

<u>Records Review</u>:

EDCC has samples collected from Outfalls 003, 006, 007, and 010 by EDCC personnel. Flow at Outfall 003 and Outfall 010 is consistent and provides a regular sampling interval. Outfalls 006 and 007 are stormwater outfalls, where samples are collected during rain events. All samples for all outfalls are collected and packaged to be sent to American Interplex for analysis. pH and Dissolved Oxygen (DO) are collected instantaneously using meters maintained and calibrated by EDCC personnel. I observed calibration records to be complete and include all required information. American Interplex sends an ice chest for each day of sampling with bottles and a Chain of Custody (COC); and after sampling, the ice chest is sent by courier to American Interplex with the other entities of the Ouachita Joint Pipeline (AR0050296). After analysis, the bench sheet results are transferred to a spreadsheet to calculate the results for reporting on Discharge Monitoring Reports (DMR) in NetDMR. There were no inconsistencies with the data reviewed.

<u>Facility Inspection</u>:

I observed the treatment system in association with sanitary wastewater at Outfall 003. Materials from the bar screen are collected daily (see Photo 1) and water enters the Imhoff tanks after bar screening (see Photo 2). Following the bar screen, there are several sand filter beds and there was some water observed to be filtering through the sand filter beds (see Photos 3-5). Following sand filter treatment, treated wastewater is discharged through a manufactured Parshall flume, where sampling is conducted (see Photos 6-7). I advised the staff, if using chemical herbicide application, care needs to be taken not to spray in the location of the discharge stream. Next, I observed the outfalls associated with the discharge of untreated stormwater. Outfall 007 has a large flow measurement device (see Photos 8-10) that is monitored during each rain event that produces a discharge. During discharges at Outfall 007, the facility is required to sample in accordance with Part IA. At the time of inspection, there was not a discharge from Outfall 007 and I observed a totalizer (see Photo 11) that is used to record instantaneous flow measurements. There is also a staff gage in the flow device that is used to perform flow checks (see Photos 12-13). Outfall 006 is designed the same as Outfall 007 and discharges during rain events (see Photos 14-19). At this outfall, some lime is used to adjust the pH because there have been several instances of low pH at this outfall (see Photo 15). For the process wastewater treatment, I observed Lake Killdeer first and Lake Lee second. Lake Killdeer is a large facultative lagoon with aeration and a sprayer. At the time of inspection, there was excessive vegetation around the Lake (see Photos 20-22). David Sartain, Environmental Coordinator, stated that the contract for mowing had been affected by the ongoing pandemic and there would be removal of the vegetation very soon. I advised Mr. Sartain to obtain photos of removed vegetation to supply as a response to this inspection report. Sampling equipment, meters, and the flow device were all in good working condition and the staff demonstrated calibrating the meters (see Photos 23-34). Outfall 010 is a set of pumps that deliver the wastewater to the Ouachita Joint Pipeline (AR0050296), which then discharges in the Ouachita River. Outfall 001 is an emergency outfall that would discharge in the instance that the Ouachita Joint Pipeline is not in operation (see Photos 35-36). After observing Lake Kildeer, we proceeded to Lake Lee, which is a small pond with aerators following chemical pH

neutralization. At Lake Lee, I observed several spray nozzles that were recirculating water in the pond (see Photos 37-40). Mr. Sartain explained that the aerators were used, but had several issues so they started recirculating the water through fire spray nozzles and found that there was a significant reduction in algae bloom. Vegetation surrounding Lake Lee was also excessive (see Photo 37).

<u>Permit Appeal Resolution (PAR) Lis 18-060 Comments</u>:

On July 2, 2018, EDCC signed a PAR with DEQ to have some conditions stayed during a collection of background flow monitoring data. Violations 1 and 2 are the result of conditions that have been stayed as part of the PAR, but the permit has not been modified, so the violations were included with this inspection. While no response is required by DEQ - OWQ Compliance Branch, it is strongly encouraged that the permittee contact Permits Branch and Office of Legal in relation to the PAR. Collection of the background flow was completed and submitted for the years of 2018 and 2019 by EDCC, and the 3-year interim period for the permit expires October 1, 2020. Conditions of the PAR state that a modification of the permit shall be before December 31, 2020.

INSPECTOR'S SIGNATURE:	**Michael Young**	DATE: **8/26/2020**
SUPERVISOR'S SIGNATURE:	**Kerri McCabe**	DATE: **8/26/2020**

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
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:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑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: **Excessive vegetation around Lake Lee and Lake Killdeer.**	☐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 ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y ☐N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE
SECTION E1: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS: **Outfall 003**	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: **Engineered Parshall Flume**	☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☐Y ☐N ☑NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE:	☐Y ☐N ☑NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☐Y ☐N ☑NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☐Y ☐N ☑NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE
SECTION E2: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS: **Outfall 006**	
10. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: **Yes** TYPE OF DEVICE: **Parshall Flume**	☑Y ☐N ☐NA ☐NE
11. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
12. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y ☐N ☐NA ☐NE
13. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
14. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
15. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
16. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
17. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
18. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE
SECTION E3: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS: **Outfall 007**	
19. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: **Yes** TYPE OF DEVICE: **Parshall Flume**	☑Y ☐N ☐NA ☐NE
20. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
21. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: **Totalizer**	☑Y ☐N ☐NA ☐NE
22. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
23. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
24. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
25. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
26. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
27. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION E4: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS: **Outfall 010**	
28. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: **In-pipe Mag-flow**	☑Y ☐N ☐NA ☐NE
29. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
30. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: **Totalizer**	☑Y ☐N ☐NA ☐NE
31. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
32. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
33. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
34. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☐Y ☐N ☐NA ☑NE
35. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
36. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐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) :	☑Y ☐N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☑Y ☐N ☐NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☑Y ☐N ☐NA ☐NE
a. LAB NAME: **American Interplex**	
b. LAB ADDRESS: **8600 Kanis Road Little Rock, AR**	
c. PARAMETERS PERFORMED: **All except pH and DO**	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION: **Outfalls 006 and 007 run Acute; permit says Chronic. PAR has condition stayed.**	☐Y ☑N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: **Retest after failure in 2018. Final report due August 17, 2020. No failures during TRE.**	☑Y ☐N ☐NA ☐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							No Discharge; Emergency use only
002							No Discharge; Emergency use only
003	No	No	No	No	No	Colorless	
006							No Discharge
007							No Discharge
010	No	No	No	No	No	Colorless	Routed to Ouachita Pipeline

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:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐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

DMR Calculation Check

Reporting Period:	**From**	**2019**	**04**	**01**	**To**	**2019**	**04**	
		Year	**Month**	**Day**		**Year**	**Month**	**Day**

Parameter Checked: **NH3-N – Outfall 006**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**16.93/102.1**	**16.93**	**34**
Calculated Value:	**16.93/102.1**	**16.93**	**34**
Permit Value:	**Report**	**Report**	**Report**

If calculated value does not equal reported value, explain:

Equal.

This outfall is under interim limits of "report only."

Final limits for this outfall are concentrations of 0 mg/L NH3-N.

DMR Calculation Check

Reporting Period:	**From**	**2020** (Year)	**01** (Month)	**01** (Day)	**To**	**2020** (Year)	**01** (Month)	**31** (Day)

Parameter Checked: **Sulfates – Outfall 007**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**69.64/69.64**	**130**	**130**
Calculated Value:	**69.64/69.64**	**130**	**130**
Permit Value:	**Report**	**Report**	**Report**

If calculated value does not equal reported value, explain:

Equal.

This outfall is under interim limits of "report only."

Final limits for this outfall are concentrations of 41 mg/L (Mon. Avg.) and 61.5 mg/L (Daily Max) Sulfates.

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**09:54**
Witness:				Photo #:	**1**
Description:	**Bar screen for influent wastewater entering wastewater treatment plant.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**09:55**
Witness:				Photo #:	**2**
Description:	**Imhoff tanks for the treatment of sanitary wastewater.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**09:56**
Witness:				Photo #:	**3**
Description:	**Wastewater from Imhoff tanks entering piping for sand filter beds.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**09:56**
Witness:				Photo #:	**4**
Description:	**Sand filter system for the treatment of sanitary wastewater.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**09:56**
Witness:				Photo #:	**5**
Description:	**Sand filter system for the treatment of sanitary wastewater.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**09:59**
Witness:				Photo #:	**6**
Description:	**Flow device for Outfall 003 and sample location.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**09:59**
Witness:				Photo #:	**7**
Description:	**Discharge location for Outfall 003.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:14**
Witness:				Photo #:	**8**
Description:	**Stormwater ditch leading to Outfall 007.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:15**
Witness:				Photo #:	**9**
Description:	**Discharge pipe for stormwater routing to Outfall 007.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:15**
Witness:				Photo #:	**10**
Description:	**Outfall 007 flow device.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:15**
Witness:				Photo #:	**11**
Description:	**Totalizer used at Outfall 007 to read instantaneous measurement.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:15**
Witness:				Photo #:	**12**
Description:	**Sample location for Outfall 007.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:16**
Witness:				Photo #:	**13**
Description:	**Staff gage used at Outfall 007 to perform flow checks on totalizer.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:20**
Witness:				Photo #:	**14**
Description:	**Stormwater discharge location to Outfall 006.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:20**
Witness:				Photo #:	**15**
Description:	**Outlet for stormwater with white staining. Staining stated to be lime residuals.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:20**
Witness:				Photo #:	**16**
Description:	**Monitoring location for Outfall 006.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:20**
Witness:				Photo #:	**17**
Description:	**Staff gage for Outfall 006.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:20**
Witness:				Photo #:	**18**
Description:	**Outfall 006 before monitoring point.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:21**
Witness:				Photo #:	**19**
Description:	**Discharge from Outfall 006 from EDCC.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:31**
Witness:				Photo #:	**20**
Description:	**Lake Killdeer with excessive vegetation.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:32**
Witness:				Photo #:	**21**
Description:	**Sprayer used to diffuse air.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:32**
Witness:				Photo #:	**22**
Description:	**Lake Killdeer with aeration.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:32**
Witness:				Photo #:	**23**
Description:	**pH buffer containers and calibration records.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:33**
Witness:				Photo #:	**24**
Description:	**Composite sampler used to collect samples.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:33**
Witness:				Photo #:	**25**
Description:	**Back-up composite sampler.**				

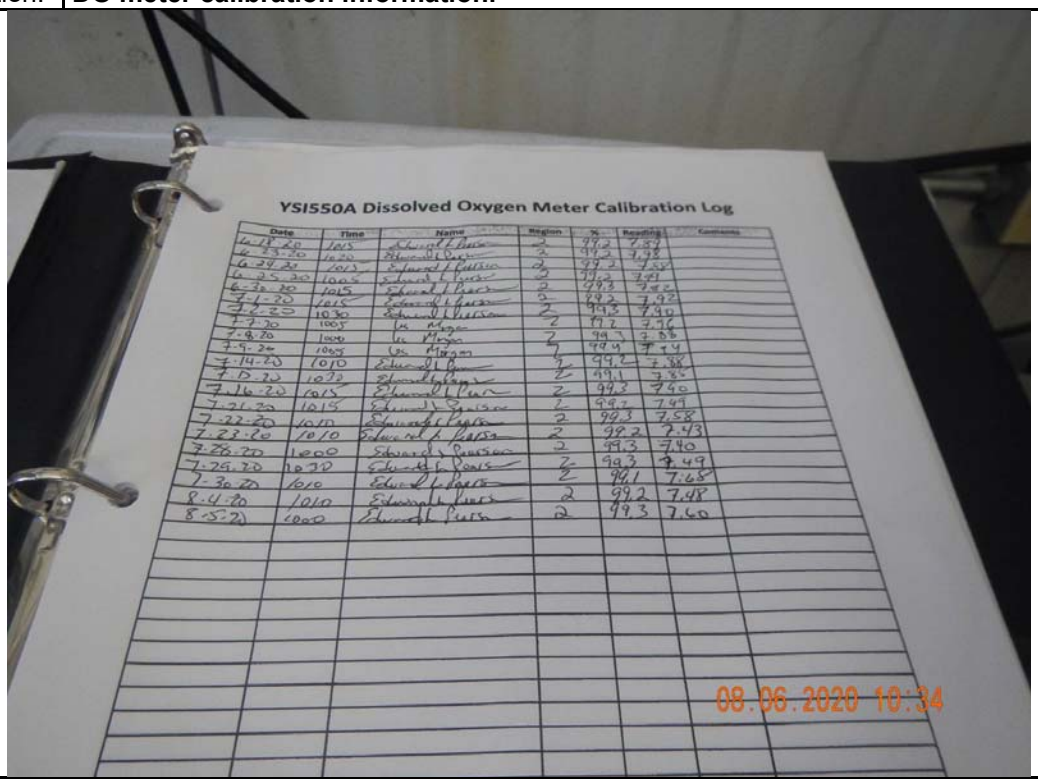
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:33**
Witness:				Photo #:	**26**
Description:	**Temperature was between 0-6°C.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:33**
Witness:				Photo #:	**27**
Description:	**Composite sampler with sample collected for Thursday.**				

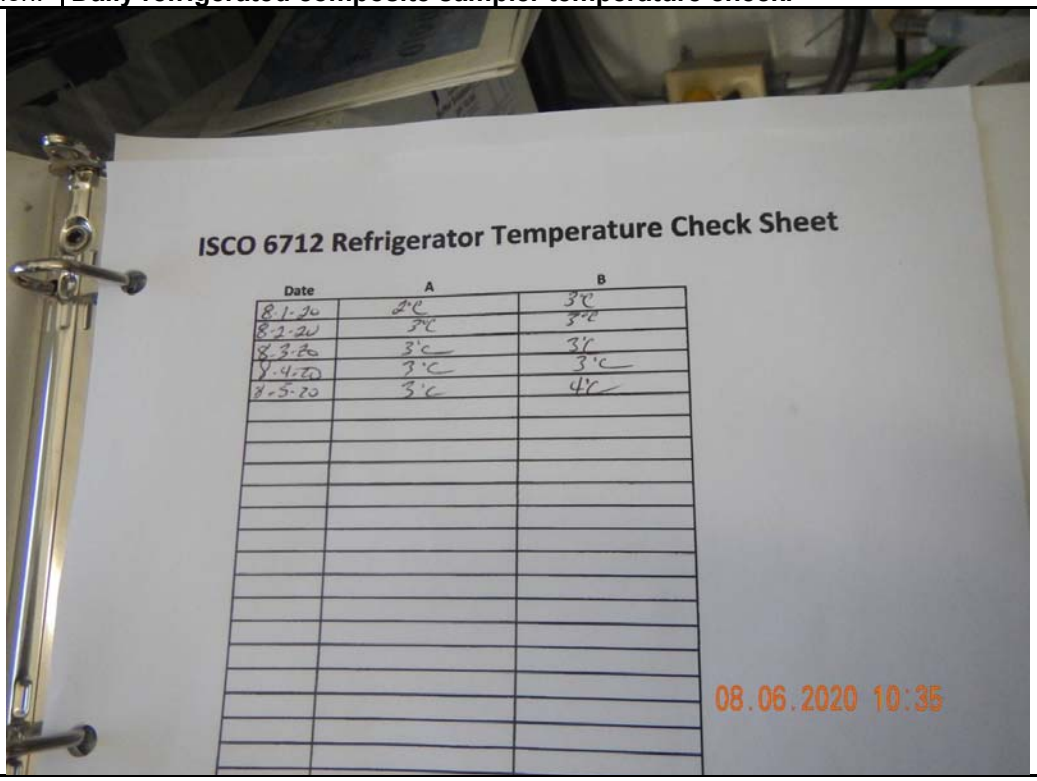
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:33**
Witness:				Photo #:	**28**
Description:	**Flowmeter for Outfall 010.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:34**
Witness:				Photo #:	**29**
Description:	**pH meter calibration information.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:34**
Witness:				Photo #:	**30**
Description:	**DO meter calibration information.**				



Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:35**
Witness:				Photo #:	**31**
Description:	**Daily refrigerated composite sampler temperature check.**				



Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:35**
Witness:				Photo #:	**32**
Description:	**Ice chest from American Interplex with sampling equipment for Thursday.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:35**
Witness:				Photo #:	**33**
Description:	**Water routed to allow for continuous pH measurements.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:36**
Witness:				Photo #:	**34**
Description:	**In-line continuous pH meter.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:41**
Witness:				Photo #:	**35**
Description:	**Outfall 001 with a cap. Outfall only used in emergencies and when pipeline is down.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:41**
Witness:				Photo #:	**36**
Description:	**Discharge location in the instance that there is a discharge from Outfall 001.**				

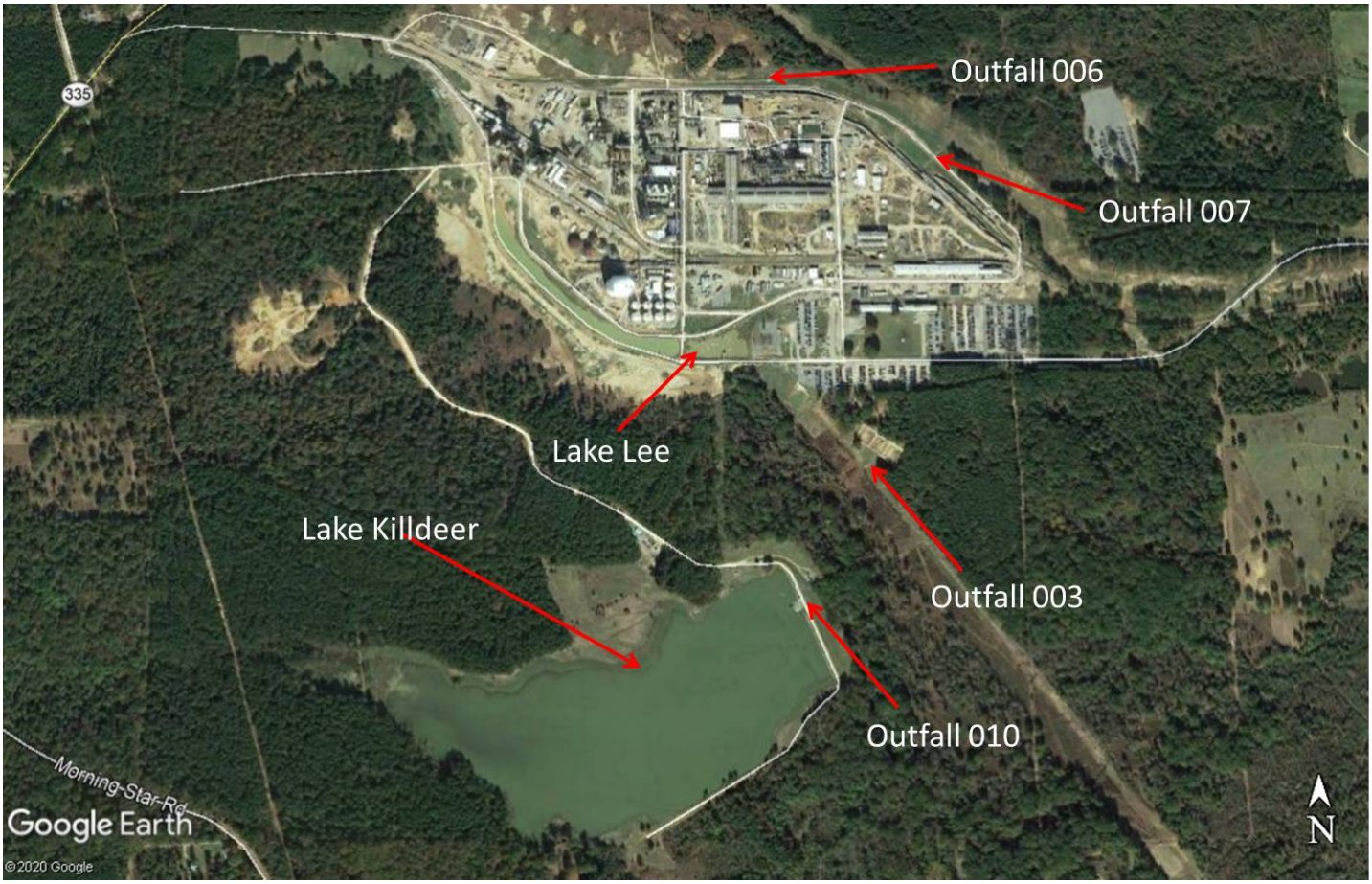
Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:52**
Witness:				Photo #:	**37**
Description:	**Lake Lee with excessive vegetation.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:53**
Witness:				Photo #:	**38**
Description:	**Water being routed to Lake Lee.**				

Water Division Photographic Evidence Sheet					
Location:	**El Dorado Chemical Company**				
Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:53**
Witness:				Photo #:	**39**
Description:	**Lake Lee with some excessive vegetation and sprayers.**				

Photographer:	**Michael Young**	Date:	**08/06/2020**	Time:	**10:54**
Witness:				Photo #:	**40**
Description:	**Pumps at Lake Lee delivering water to Lake Killdeer.**				

Figure 1. Overview of El Dorado Chemical and the location of treatment units and outfalls.



ADEQ

ARKANSAS
Department of Environmental Quality

October 21, 2020

Delmar R. Reppond, General Manager
El Dorado Chemical Company
4500 North West Avenue
El Dorado, AR 71730

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

Dear Mr. Reppond:

I have reviewed the response pertaining to my August 6, 2020 inspection of El Dorado Chemical Company. 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 Young
District 8 Field Inspector
Office of Water Quality