



CHEMICAL COMPANY

May 30, 2014

Craig Uyeda
Enforcement Branch Manager
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: Annual Progress Report – El Dorado Chemical Company
NPDES No. AR0000752

Dear Mr. Uyeda:

Although no longer required under Part IB, Section B of the referenced NPDES permit, this letter serves as our Annual Progress Report.

As stated in previous annual reports, during the past year El Dorado Chemical Company (EDCC) has continued its efforts to ensure continued compliance with current permit limitations. The following paragraphs present the details.

1. Hydrologic Study

As related in previous reports, EDCC submitted a hydrologic study plan for the storm water outfalls. This plan was approved by ADEQ and then subsequently revised to modify the location of the background monitor for Outfalls 006 and 007. During the 3rd quarter of 2006 the hydrologic study was completed and the final report submitted to the ADEQ. During the 1st quarter of 2007, EDCC received comments dated January 5, 2007 and met with ADEQ to discuss those comments. Subsequent to that meeting, GBMc received a permitting options letter for which EDCC responded. During the 1st quarter of 2008, EDCC had discussions with NPDES permitting staff regarding the utilization of the hydrologic study in the permit renewal process.

As of the date of this report, ADEQ has not proposed a modification to the NPDES permit regarding Outfalls 006 and 007 based on the hydrologic study. It is our understanding that the results of the hydrologic study will be utilized at the time of the renewal of our permit, which is expected in the second half of 2014.

2. Retention Basin Temperature Study

As documented in previous annual reports, pursuant to the requirements of the final NPDES permit, EDCC submitted a temperature study plan for the purpose of determining the influence of ambient conditions on the temperature regime of the retention basin at EDCC. The study report was completed and submitted to the ADEQ during the 4th quarter of 2005. EDCC received approval of the temperature study in a letter dated January 5, 2007 and the temperature limit will be removed from the permit upon renewal or modification of the existing permit. That modification or renewal was not proposed by ADEQ during this reporting period. We anticipate the renewal of the permit in the second half of 2014..

3. Storm Water Outfall Compliance

In June of 2008 EDCC and ADEQ signed CAO No. LIS 08-067 to address historical compliance issues at Outfalls 006 and 007. As stated in non-compliance reports attached to DMRs EDCC continued activities during 2013 to address permit excursions at Outfalls 006 and 007 while awaiting the renewal of the NPDES permit which will utilize the findings of the hydrologic study referenced Item 1 of this report. Based on our communications with the NPDES permit staff, water quality based effluent limitations for Outfalls 006 and 007 along with the critical dilutions for biomonitoring will change substantially upon renewal of the permit .

4. Source Reduction and Wastewater Treatment

During the reporting period, source reduction activities have continued to be implemented to reduce waste loading to the wastewater system. These efforts have resulted in major reductions in the ammonia and nitrate concentrations measured in our stabilization basin (Lake Lee). For 2013 Lake Lee ammonia concentrations averaged 10.85 mg/L and nitrate averaged 25.57 mg/L. These source reduction efforts along with continued efficient operation of our wastewater treatment are shown in the Outfall 001 effluent characteristics.

For 2013 Outfall 001 averaged 3.73 mg/L Ammonia-N and 11.72 mg/L Nitrate-N compared to the June 1, 2007 monthly average permit limits of 12 mg/L and 26.3 mg/L respectively. Please note that Outfall 001 ceased discharging on a regular

basis in September 2013 once the Joint Pipeline was completed and able to be utilized.

The discharge from our wastewater treatment plant is now discharged through Outfall 010 to the Joint Pipeline. During this reporting period there were no violations at Outfall 010 for Ammonia-N or Nitrate-N.

The charts attached show the source reduction and treatment effectiveness the plant accomplished through 2013 for both Outfall 001 and 010. Biomonitoring for Outfall 010 is now done quarterly. As there were only two samplings in 2013, and updated graph will be prepared and reported in next year's report.

5. Wastewater System

During the reporting period, EDCC continued use of the AquaMats in Lake Lee and Lake Kildeer. AquaMats are membranes for sustaining colonies of nitrifying and denitrifying bacteria. In addition in the spring of 2013 EDCC introduced tilapia into Lake Kildeer as an algae control measure. Under this program the tilapia were removed towards the end of 2013 to reduce biomass from Lake Kildeer.

6. Wastewater Treatment Bio-augmentation

As discussed in previous reports, during the reporting period, EDCC continued implementation of the alternative wastewater treatment technology. We continue the collection of performance data to determine the efficacy of the organisms in our wastewater treatment system.

The data that EDCC has collected so far indicates that the addition of various microbes continues to have a positive impact on the wastewater treatment system.

7. Joint Pipeline Activities

Construction of the joint pipeline began in July of 2012 and was completed on August 29, 2013. EDCC began utilizing the pipeline on September 9, 2013 through its Outfall 010.

8. Water Quality (4g) Study for Dissolved Minerals

EDCC has continued its efforts to get USEPA approval of the amended State of Arkansas Water Quality Standards as approved by the Arkansas Pollution Control and Ecology Commission. EDCC developed and submitted to ADEQ and USEPA additional documentation to support the site specific dissolved minerals water quality

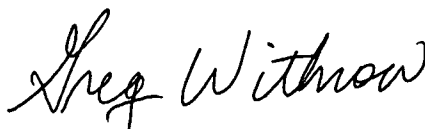
criteria. Based on that documentation, EDCC received Commission approval on another amendment which USEPA declined to approve. EDCC is continuing the pursuit of a legal remedy to the situation.

9. Outfall 002 Discharge Minimization Project

EDCC completed the project to increase the pump capacity out of the stabilization basin into the 50-acre equalization basin by 300% by installing a 3,000 gpm capacity pump and a dedicated pipe to the equalization basin. There were 4 discharges from Outfall 002 during 2013 and we would expect them to occur only under the most atypical storm events.

Hopefully, this letter has adequately explained the status of our NPDES efforts over the last year. Should you have any questions, please feel free to call me at (405) 235-4546.

Sincerely,

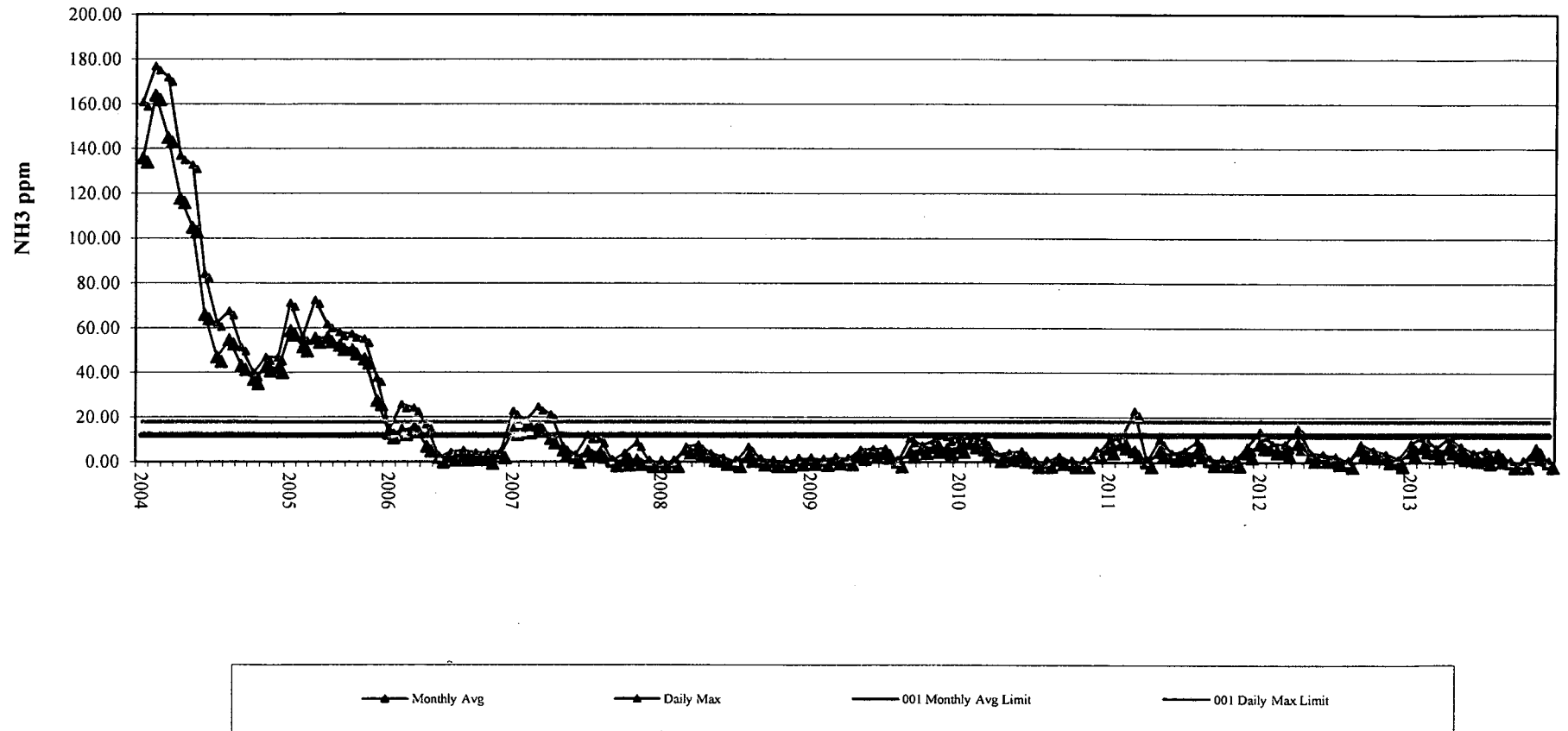


Greg Withrow
General Manager

JMC/ymq

cc: Mo Shaffi, Water Division Asst. Chief, ADEQ

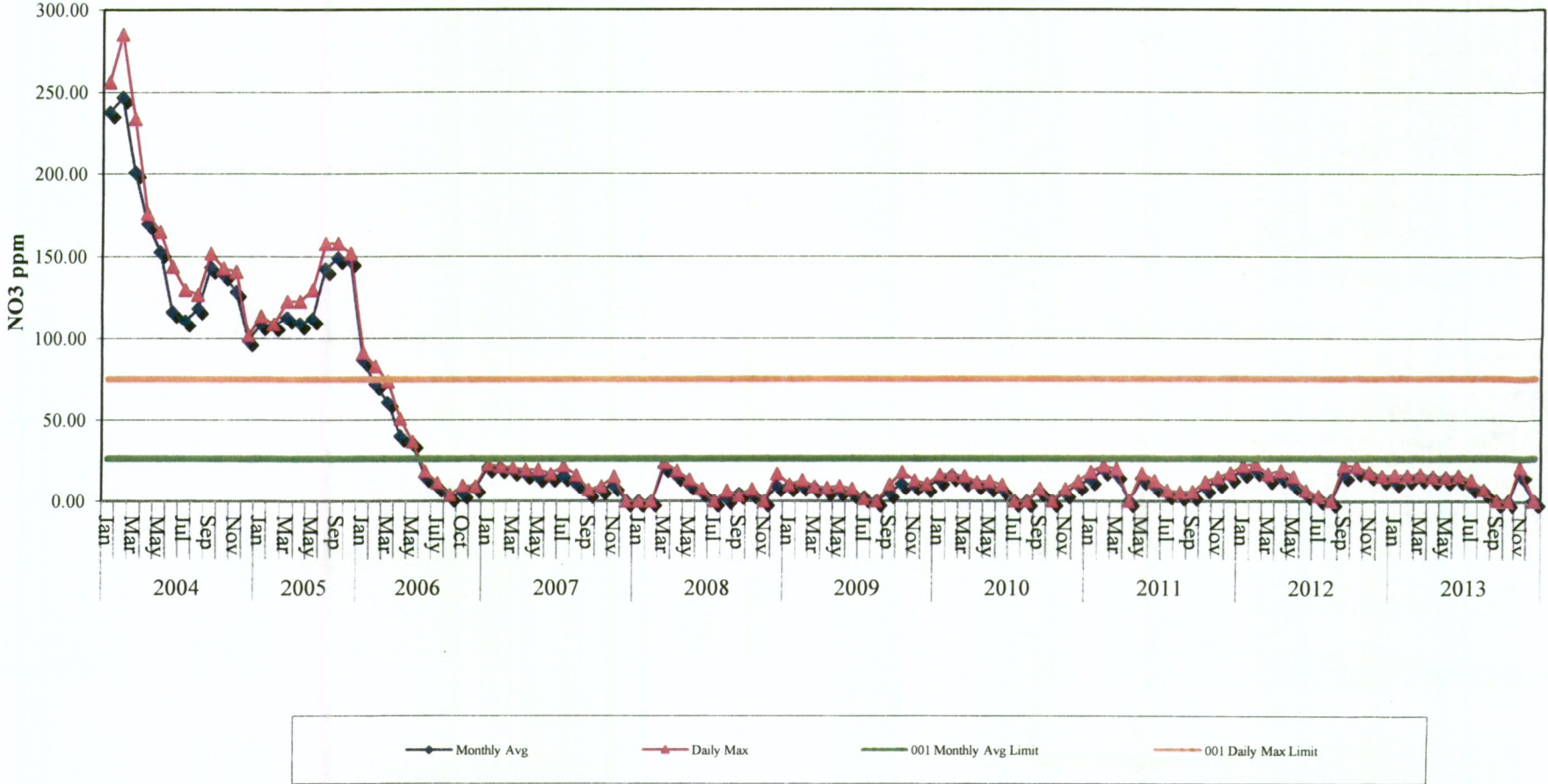
NH3 Compared to 001Outfall Limits



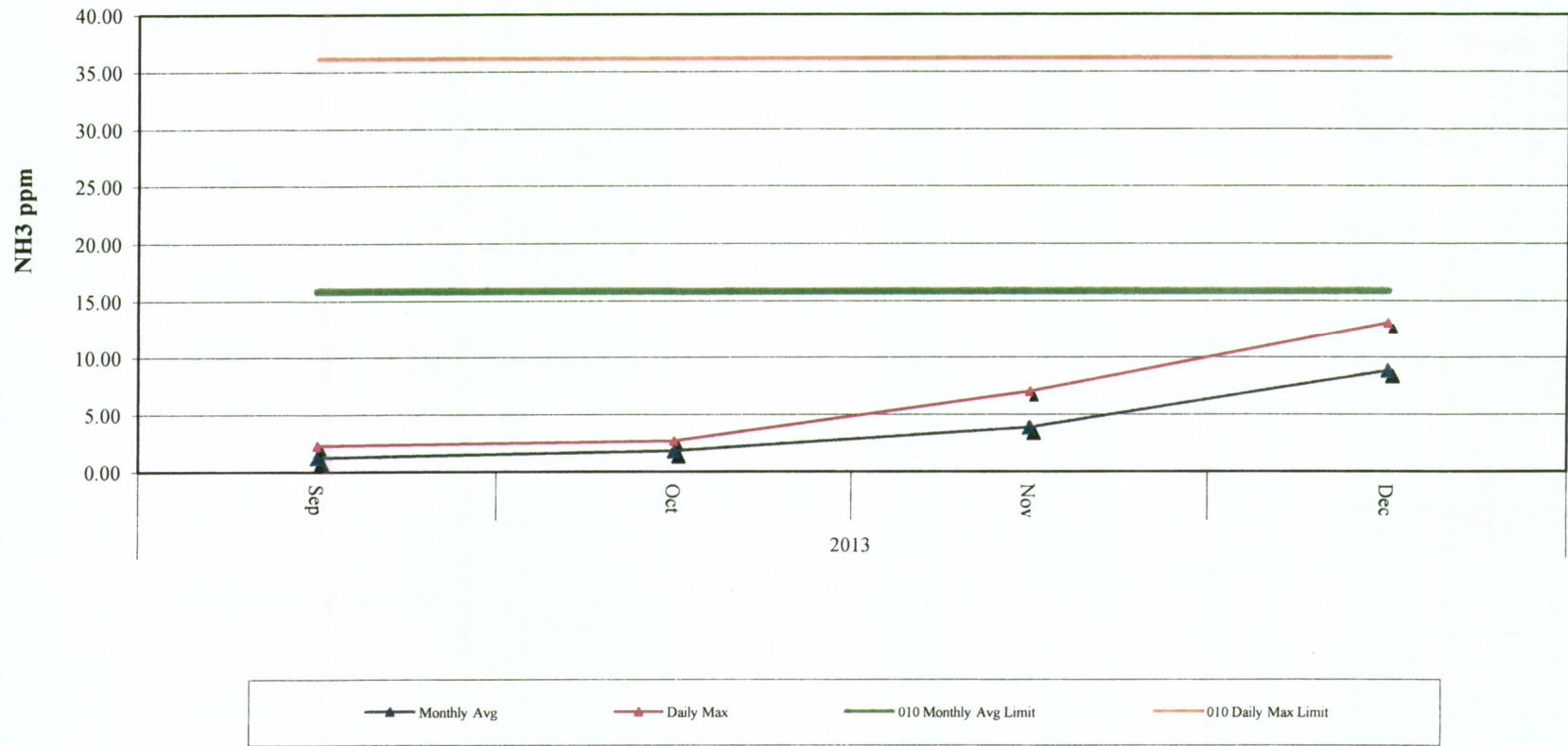
NH3 Compared to 001Outfall Limits



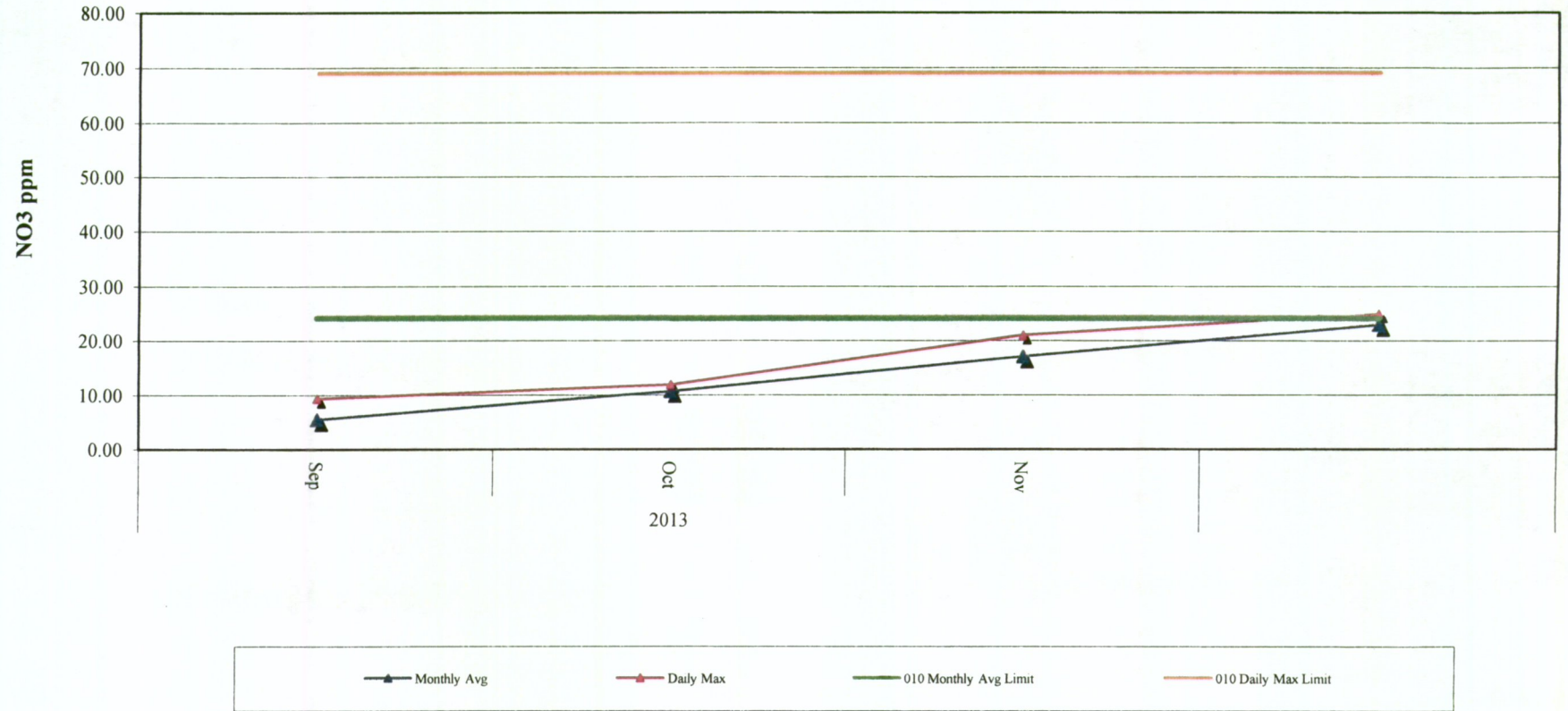
NO3 Compared to 001 Outfall Limits



NH3 Compared to 010 Outfall Limits

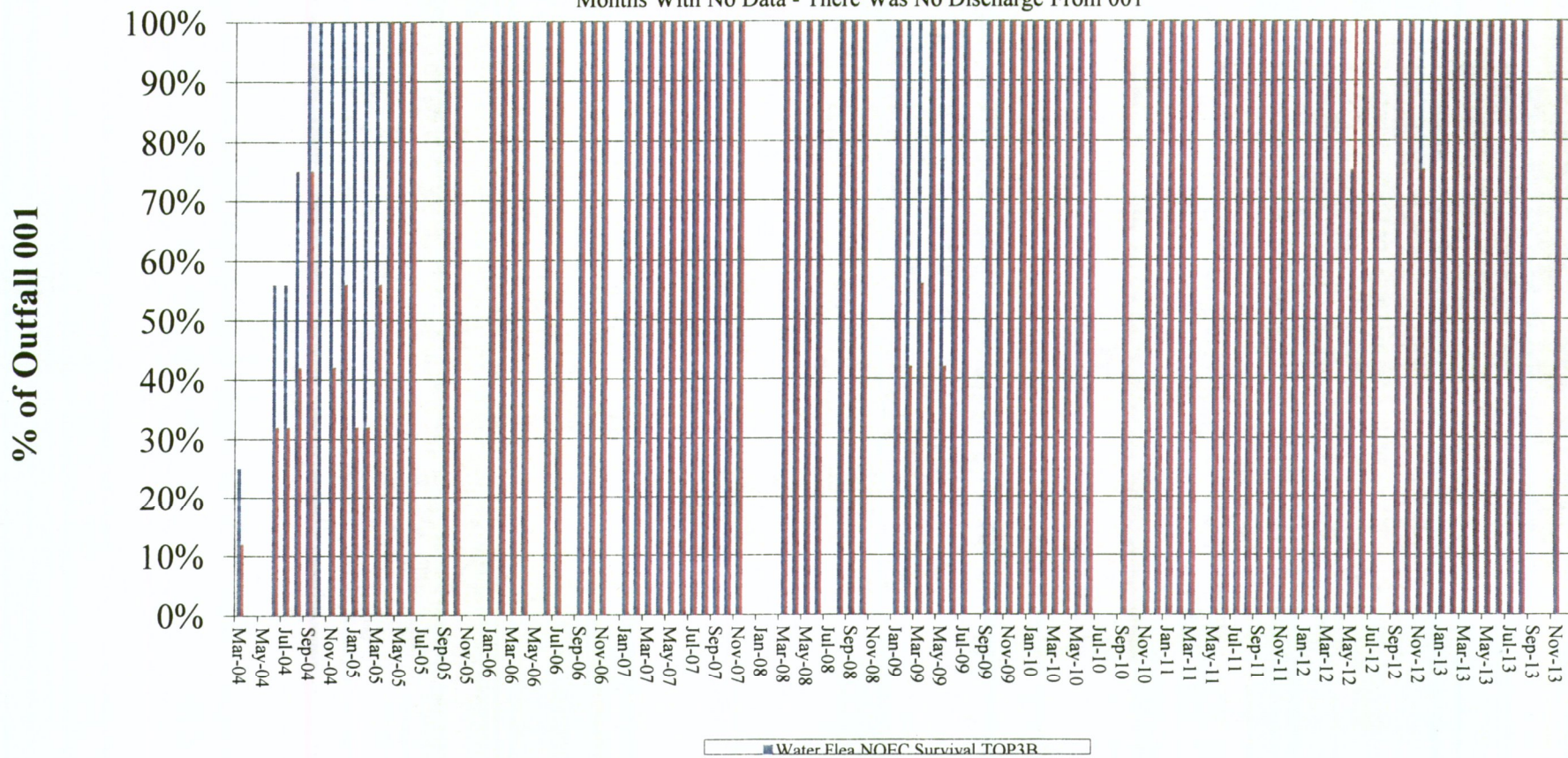


NO3 Compared to 010 Outfall Limits



El Dorado Chemical Co. Outfall 001 Biomonitoring Test Results

No Observed Effects Concentration - Survival
Months With No Data - There Was No Discharge From 001



From: (870) 863-1403
 David Sartain
 El Dorado Chemical Company
 4500 NW Ave

Origin ID: ELDA



Ship Date: 30MAY14
 ActWgt: 0.5 LB
 CAD: 5867030/NET3490

El Dorado, AR 71730

Delivery Address Bar Code



SHIP TO: (501) 682-0616

BILL SENDER

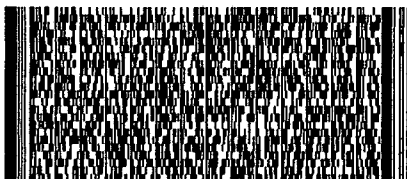
Mo Shafii - Assistant Chief
ADEQ - Water Division
5301 NORTSHORE DRIVE

NORTH LITTLE ROCK, AR 72118

Ref #
 Invoice #
 PO #
 Dept #

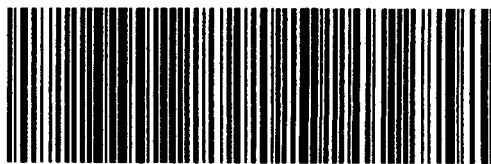
MON - 02 JUN 10:30A
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