

ADEQ

ARKANSAS
Department of Environmental Quality

April 22, 2013

Greg Withrow
El Dorado Chemical Co.
P.O. Box 231
El Dorado, AR 71731-0231

RE: NPDES Permit Number AR0000752, AFIN 70-00040
NPDES Permit Effluent Violations

Dear Mr. Withrow,

A recent review of the above referenced permit has revealed the following permit effluent violations for the monitoring periods ending November 2012, December 2012, January 2013, and February 2013:

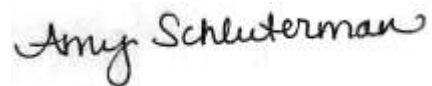
Monitoring Period	Discharge Number	Parameter	Violation	Limit
11/30/12	001-A	pH, Maximum	9.10	9.0
11/30/12	001-A	Total Dissolved Solids (Mon. Avg., mg/l)	300.0	237.0
11/30/12	006-A	Total Recoverable Zinc (Mon. Avg., ug/l)	711.0	115.62
11/30/12	006-A	Total Recoverable Zinc (Daily Max, ug/l)	711.0	231.99
11/30/12	006-A	Total Recoverable Lead (Mon. Avg., ug/l)	9.7	3.8
11/30/12	006-A	Total Recoverable Lead (Daily Max, ug/l)	9.7	7.62
11/30/12	006-A	Total Dissolved Solids (Mon. Avg., mg/l)	2500	291
11/30/12	006-A	Total Dissolved Solids (Daily Max, mg/l)	2500	436.5
11/30/12	007-A	Total Recoverable Zinc (Mon. Avg., ug/l)	661.0	115.62
11/30/12	007-A	Total Recoverable Zinc (Daily Max, ug/l)	661.0	231.99
11/30/12	007-A	Total Recoverable Lead (Mon. Avg., ug/l)	7.35	3.8
11/30/12	007-A	Total Dissolved Solids (Mon. Avg., mg/l)	2100	291
11/30/12	007-A	Total Dissolved Solids (Daily Max, mg/l)	2100	436.5
12/31/12	001-A	pH, Maximum	9.2	9.0

12/31/12	001-A	Total Dissolved Solids (Mon. Avg., mg/l)	270.0	237.0
12/31/12	006-A	Total Recoverable Zinc (Mon. Avg., ug/l)	340.9	115.62
12/31/12	006-A	Total Recoverable Zinc (Daily Max, ug/l)	617.0	231.99
12/31/12	006-A	Total Recoverable Lead (Mon. Avg., ug/l)	57.4	3.8
12/31/12	006-A	Total Recoverable Lead (Daily Max, ug/l)	111.0	7.62
12/31/12	006-A	Total Dissolved Solids (Daily Max, mg/l)	500	436.5
12/31/12	007-A	Total Recoverable Zinc (Mon. Avg., ug/l)	172.9	115.62
12/31/12	007-A	Total Recoverable Zinc (Daily Max., ug/l)	291.0	231.99
12/31/12	007-A	Total Recoverable Lead (Mon. Avg., ug/l)	30.02	3.8
12/31/12	007-A	Total Recoverable Lead (Daily Max, ug/l)	57.10	7.62
12/31/12	007-A	Total Dissolved Solids (Mon. Avg., mg/l)	1031.5	291
12/31/12	007-A	Total Dissolved Solids (Daily Max, mg/l)	2000	436.5
1/31/13	001-A	Total Dissolved Solids (Mon. Avg., mg/l)	280.0	237.0
1/31/13	006-A	Total Recoverable Zinc (Mon. Avg., ug/l)	187.0	115.62
1/31/13	006-A	Total Dissolved Solids (Mon. Avg. mg/l)	340	291
1/31/13	007-A	Total Recoverable Zinc (Mon. Avg., ug/l)	116.0	115.62
1/31/13	007-A	Total Recoverable Lead (Mon. Avg., ug/l)	6.9	3.8
1/31/13	007-A	Total Dissolved Solids (Mon. Avg., mg/l)	310.0	291
2/28/13	001-A	Total Dissolved Solids (Mon. Avg., mg/l)	270.0	237.0
2/28/13	006-A	Total Recoverable Zinc (Mon. Avg., ug/l)	259.0	115.62
2/28/13	006-A	Total Recoverable Zinc (Daily Max, ug/l)	259.0	231.99
2/28/13	006-A	Total Recoverable Lead (Mon. Avg., ug/l)	51.5	3.8
2/28/13	006-A	Total Recoverable Lead (Daily Max, ug/l)	51.5	7.62
2/28/13	007-A	Total Recoverable Lead (Mon. Avg., ug/l)	29.5	3.8
2/28/13	007-A	Total Recoverable Lead (Daily Max., ug/l)	29.5	7.62

As you know, Arkansas Pollution Control and Ecology Commission regulations and your NPDES Permit requires you to take all reasonable measures necessary to eliminate or prevent the occurrence of violations. Please note that any violation of your permit can lead to enforcement action by ADEQ pursuant to the Arkansas Water and Air Pollution Control Act. Also, be aware that we maintain records of violations and of non-compliance reports documenting corrective action to determine the appropriateness and level of the enforcement action.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0633 or e-mail at schluterman@adeq.state.ar.us.

Sincerely,

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

Amy Schluterman
Enforcement Analyst
Water Division, Enforcement Branch