ADEQ
ARKANSAS
Department of Environmental Quality

May 18, 2015

Greg Withrow
El Dorado Chemical Co.
P.O. Box 1414
El Dorado, AR 71731

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 and parameters:

MR End Date	Discharge Number	Parameter Description	Reported DMR Value	Permit Limit	Vio %
10/31/2014	003-A	pH (MINIMUM, SU)	5.15	6	
10/31/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	415	115.62	259%
10/31/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	640	231.99	176%
10/31/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	33.35	3.8	778%
10/31/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	61	7.62	701%
10/31/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	430	291	48%
10/31/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	530	436.5	21%
10/31/2014	007-A	pH (MINIMUM, SU)	4.29	6	
10/31/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	200	115.62	73%
10/31/2014	007-A	Lead, total recoverable (MO AVG, ug/L)	10.2	3.8	168%
10/31/2014	007-A	Lead, total recoverable (DAILY MX, ug/L)	13	7.62	71%
10/31/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	375	291	29%
11/30/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	710	115.62	514%
11/30/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	710	231.99	206%
11/30/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	8.9	3.8	134%
11/30/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	8.9	7.62	17%
11/30/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	870	291	199%

11/30/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	870	436.5	99%
11/30/2014	007-A	pH (MINIMUM, SU)	4.7	6	
11/30/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	210	115.62	82%
11/30/2014	007-A	Lead, total recoverable (MO AVG, ug/L)	7.9	3.8	108%
11/30/2014	007-A	Lead, total recoverable (DAILY MX, ug/L)	7.9	7.62	4%
11/30/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	760	291	161%
11/30/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	760	436.5	74%
12/31/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	1100	115.62	851%
12/31/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	1100	231.99	374%
12/31/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	180	3.8	4,637%
12/31/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	180	7.62	2,262%
12/31/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	750	291	158%
12/31/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	750	436.5	72%
12/31/2014	007-A	pH (MINIMUM, SU)	4.19	6	
12/31/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	1200	115.62	938%
12/31/2014	007-A	Zinc, total recoverable (DAILY MX, ug/L)	1200	231.99	417%
12/31/2014	007-A	Lead, total recoverable (MO AVG, ug/L)	9.8	3.8	158%
12/31/2014	007-A	Lead, total recoverable (DAILY MX, ug/L)	9.8	7.62	29%
12/31/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	2200	291	656%
12/31/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	2200	436.5	404%
01/31/2015	006-A	Zinc, total recoverable (MO AVG, ug/L)	450	115.62	289%
01/31/2015	006-A	Zinc, total recoverable (DAILY MX, ug/L)	450	231.99	94%
01/31/2015	006-A	Lead, total recoverable (MO AVG, ug/L)	34	3.8	795%
01/31/2015	006-A	Lead, total recoverable (DAILY MX, ug/L)	34	7.62	346%
01/31/2015	006-A	Solids, total dissolved (MO AVG, mg/L)	520	291	79%
01/31/2015	006-A	Solids, total dissolved (DAILY MX, mg/L)	520	436.5	19%
01/31/2015	007-A	Zinc, total recoverable (MO AVG, ug/L)	320	115.62	177%
01/31/2015	007-A	Zinc, total recoverable (DAILY MX, ug/L)	320	231.99	38%
01/31/2015	007-A	Lead, total recoverable (MO AVG, ug/L)	4	3.8	5%
01/31/2015	007-A	Solids, total dissolved (MO AVG, mg/L)	950	291	226%
01/31/2015	007-A	Solids, total dissolved (DAILY MX, mg/L)	950	436.5	118%

02/28/2015	006-A	Zinc, total recoverable (MO AVG, ug/L)	530	115.62	358%
02/28/2015	006-A	Zinc, total recoverable (DAILY MX, ug/L)	530	231.99	128%
02/28/2015	006-A	Lead, total recoverable (MO AVG, ug/L)	73	3.8	1,821%
02/28/2015	006-A	Lead, total recoverable (DAILY MX, ug/L)	73	7.62	858%
02/28/2015	007-A	Zinc, total recoverable (MO AVG, ug/L)	480	115.62	315%
02/28/2015	007-A	Zinc, total recoverable (DAILY MX, ug/L)	480	231.99	107%
02/28/2015	007-A	Lead, total recoverable (MO AVG, ug/L)	25	3.8	558%
02/28/2015	007-A	Lead, total recoverable (DAILY MX, ug/L)	25	7.62	228%
02/28/2015	007-A	Solids, total dissolved (MO AVG, mg/L)	780	291	168%
02/28/2015	007-A	Solids, total dissolved (DAILY MX, mg/L)	780	436.5	79%
03/31/2015	003-Q	Coliform, fecal general (7 DA GEO, #/100mL)	4600	2000	130%
03/31/2015	006-A	Zinc, total recoverable (MO AVG, ug/L)	630	115.62	445%
03/31/2015	006-A	Zinc, total recoverable (DAILY MX, ug/L)	630	231.99	172%
03/31/2015	006-A	Lead, total recoverable (MO AVG, ug/L)	64	3.8	1,584%
03/31/2015	006-A	Lead, total recoverable (DAILY MX, ug/L)	64	7.62	740%
03/31/2015	006-A	Solids, total dissolved (MO AVG, mg/L)	700	291	141%
03/31/2015	006-A	Solids, total dissolved (DAILY MX, mg/L)	700	436.5	60%
03/31/2015	007-A	Zinc, total recoverable (MO AVG, ug/L)	550	115.62	376%
03/31/2015	007-A	Zinc, total recoverable (DAILY MX, ug/L)	550	231.99	137%
03/31/2015	007-A	Lead, total recoverable (MO AVG, ug/L)	6.4	3.8	68%
03/31/2015	007-A	Solids, total dissolved (MO AVG, mg/L)	460	291	58%
03/31/2015	007-A	Solids, total dissolved (DAILY MX, mg/L)	460	436.5	5%

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 501-682-0664 or via e-mail pemberton@adeq.state.ar.us

Sincerely,

Layne Pemberton
Enforcement Analyst
Water Division, Enforcement Branch