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4500 NORTH WEST AVE. • P. O. BOX 231 • EL DORADO, AR 71731 • (501) 863-1400

EL DORADO

CHEMICAL COMPANY

September 25, 2018

Richard Healey
Enforcement Branch Manager
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

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RE: El Dorado Chemical Company
NPDES Permit No. AR0000752 – AFIN 70-00040
Compliance Schedule – Year 1 Progress Report

Dear Mr. Healey:

El Dorado Chemical Company (EDCC) currently maintains coverage under NPDES Permit No. AR0000752, effective October 1, 2017. Pursuant to the requirements of Condition No. 1 of Part 1B of the referenced permit, this letter serves as the first-year progress report toward achieving compliance with final effluent limitations for:

- a. Dissolved Oxygen for the months of May through October for Outfall 003,
- b. Ammonia-Nitrogen, Chlorides, Sulfates, and TDS at Outfalls 001, 002, 003, 006, 007, 102ST, and 103ST,
- c. *P. promelas* and *C. dubia* sub-lethal limits at Outfall 001.

The following paragraphs address the compliance issues regarding activities related to permit compliance in Year 1.

- a. Final Effluent Limitations for Dissolved Oxygen for the months of May through October for Outfall 003

The Dissolved Oxygen limits at Outfall 003 were stayed as part of the permit appealed filed on September 27, 2018 for the referenced permit. In accordance with Permit Appeal Resolution for Docket No. 17-001-P, LIS 18-060, July 6, 2018, the interim permit limit will go into effect on January 1, 2019. Thus, sampling for Dissolved Oxygen at Outfall 003 will not be initiated until January 1, 2019. Compliance with final permit limits can be further evaluated once routine sampling begins.

b. Ammonia-Nitrogen, Chlorides, Sulfates, and TDS at Outfalls 001, 002, 003, 006, 007, 102ST, and 103ST

Final permit limits for Ammonia-Nitrogen, Chlorides, Sulfates, and TDS at Outfalls 001, 002, 003, 006, 007, 102ST, and 103ST were stayed as part of the permit appeal filed on September 27, 2017 for the referenced permit.

In accordance with Permit Appeal Resolution for Docket No. 17-001-P, LIS 18-060, July 6, 2018, EDCC proposed a TMDL study that would collect water quality data in the ELCC Tributary and other information that can be used to modify the TMDL for the ELCC Tributary (and other tributaries) that are subject to the TMDL. EDCC and ADEQ agreed that a modified permit with final effluent limitations should not be issued pursuant to the Permit Appeal Resolution until after EDCC has been given time to complete the TMDL study and seek EPA approval of a modified TMDL.

The data collected during the TMDL study will be used to re-evaluate the TMDL, including load and wasteload allocations (upon which final limits for Ammonia-Nitrogen, Chlorides, Sulfates, TDS are to be based). ADEQ agreed to the proposed scope of work. Field data collection for the TMDL study has been completed and the data is being analyzed. Ancillary information is currently being collected and should be complete by December 31, 2018. As specified in Order and Agreement No. 5 of the PAR, a revised ELCC tributary report (a modified TMDL) will be submitted to ADEQ by March 31, 2019.

c. *P. promelas* and *C. dubia* sub-lethal limits at Outfall 001

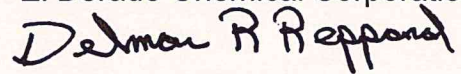
In accordance with NPDES Permit No. AR0000752, EDCC utilizes Outfall 010, which discharges to the Ouachita River Joint Pipeline, as its primary outfall. Outfall 001 would only be used during emergency situations. EDCC commenced discharging to the Ouachita River Joint Pipeline in September 2013. Outfall 001 has not discharged since November 2013. If future discharges from Outfall 001 occur, evaluation with final permit limitations will be conducted.

In addition to these activities, Condition No. 2 pertaining to flow monitoring downstream of Outfalls 006 and 007 has been completed. A letter of written certification for flow equipment installation and operation was submitted to ADEQ on April 9, 2018.

Hopefully, this letter has adequately explained the status of our NPDES efforts with respect to Schedule of Compliance activities over the last year. Should you have any questions, please feel free to call David Sartain at (870) 863-1403.

Sincerely,

El Dorado Chemical Corporation

A handwritten signature in black ink that reads "Delmar R. Reppond". The signature is written in a cursive style with a large, stylized 'D' at the beginning.

Delmar R. Reppond
General Manager