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July 31, 2019

Layne Pemberton  
Enforcement Analyst  
Office of Water Quality  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR, 72118

Re: Quarterly Activity Report – TRE Plan El Dorado Chemical Company  
NPDES No. AR0000752, AFIN- 70-00040

Dear Mr. Pemberton:

This letter represents the 4<sup>th</sup> Quarterly Activity Report pursuant to the project schedule for the Toxicity Reduction Evaluation Plan for El Dorado Chemical Company, Outfall 007 for *Pimephales promelas*.

Outfall 007 has passed the monthly 48-hour Whole Effluent Toxicity (WET) Test for *Pimephales promelas* required by the permit for the months of May 2019, June 2019, and July 2019 at 100% effluent. In accordance with the approved TRE plan, no additional TIE or TRE activities can be pursued in the absence of toxicity at the 100% effluent dilution.

Please note that because no additional effluent toxicity has been observed following our April 2019 WET Test failure, additional TIE pH adjusted tests have not been completed. However, we believe that TIE pH adjustment manipulation completed on the April 2019 WET Test demonstrated that low pH of the original sample was the primary toxicity factor and care will be taken to monitor effluent pH as it relates to WET testing.

Monthly WET testing will continue for Outfall 007 and TIE/TRE activities will be conducted should the outfall exhibit toxicity at the 100% effluent dilution. Please contact me at [DSartain@edc-ark.com](mailto:DSartain@edc-ark.com) or (870-863-1403) for additional information. Kyle Hathcote of GBMc & Associates can also be contacted for questions or information at [khathcote@gbmcassoc.com](mailto:khathcote@gbmcassoc.com) or 501-847-7077.

Respectfully submitted,

David Sartain  
El Dorado Chemical Company