



4500 NORTH WEST AVE. • P. O. BOX 231 • EL DORADO, AR 71731 • (870) 863-1400 • FAX: (870) 863-1426

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 4th 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 or (870-863-1403) for additional information. Kyle Hathcote of GBMc & Associates can also be contacted for questions or information at khathcote@gbmcassoc.com or 501-847-7077.

Respectfully submitted,

David Sartain
El Dorado Chemical Company