



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

September 19, 2019

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

RE: El Dorado Chemical Company
NPDES Permit No. AR0000752 – AFIN 70-00040
Compliance Schedule – Year 2 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 appeal filed on September 27, 2017 for the referenced permit. In accordance with Permit

Appeal Resolution for Docket No. 17-001-P, the interim permit limit went into effect on January 1, 2019.

Since January 1, 2019, quarterly sampling for Dissolved Oxygen has been performed at Outfall 003. The table below provides a summary of these sampling results.

| Sample Date | Dissolved Oxygen Sample Result (mg/L) | Final Dissolved Oxygen Permit Limit (mg/L) |
|-------------|---------------------------------------|--|
| 01/30/2019 | 4.8 | 2.0 |
| 05/06/2019 | 5.9 | 4.0 |
| 08/08/2019 | 5.18 | 4.0 |

Based on the limited data, compliance with final permit limits for Dissolved Oxygen at Outfall 003 have been achieved. However, EDCC will utilize the time remaining in the Schedule of Compliance to further evaluate continued compliance with final permit limits.

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, 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. A draft ELCC tributary report (a modified TMDL) was submitted to ADEQ on March 29, 2019. A meeting to discuss the draft was held with ADEQ on June 20, 2019. The report is currently being revised to address requested amendments by ADEQ. A revised report is expected to be submitted to ADEQ in September 2019.

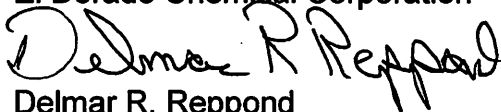
c. *P. promelas* and *C. dubia* sub-lethal limits at Outfall 001

In accordance with NPDES Permit No. AR0000752, EDCC utilizes Outfall 010, which discharges 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.

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, appearing to read "Delmar R. Reppond". The signature is written in a cursive style with a large initial "D".

Delmar R. Reppond
General Manager