



ARKANSAS
Department of Environmental Quality

January 26, 2015

CERTIFIED MAIL: 91 7199 9991 7030 4937 2571

Greg Withrow
General Manager, El Dorado Chemical Company
P.O. Box 1414
El Dorado, AR 71731

RE: NPDES Permit No.: AR0000752, AFIN: 70-00040
NPDES Permit Effluent Violations and Requesting a CAP

Dear Mr. Withrow:

The Department has conducted a file review of the above referenced permit and determined your facility reported one hundred eighteen (118) effluent violations of Part I, Section A of your Permit since January 1, 2014. Attached is a detailed list.

The Department recommends that El Dorado Chemical Company consult with a Professional Engineer (PE) for the purpose of developing a Corrective Action Plan (CAP). The CAP should be certified by a PE registered in the state of Arkansas and should detail the corrective actions taken or that will be taken to achieve compliance with the terms of the Permit. The CAP should include the date the Facility expects to be in compliance along with a milestone schedule with dates. Please submit the CAP to the Department by **February 13, 2015**.

Our record indicated that you have discharged from outfalls 006 and 007 in lieu of outfall 010 to the pipeline. Please provide documentation to the Department for the period January 1, 2014 through December 31, 2014, of the dates when El Dorado Chemical Company discharged from outfalls 006 and 007 and the reason for those discharges.

Any violation of your NPDES Permit is subject to enforcement action that may include the assessment of a civil penalty by this Department.

Thank you for your attention to this matter. Should you have any questions, or would like to request a meeting, feel free to contact me at 501-682-0630 or you may e-mail me at allen-daniel@adeq.state.ar.us.

Sincerely,

Leslie Allen-Daniel
Enforcement Analyst
Water Division Enforcement Branch

El Dorado Chemical Company

AR0000752

DMR End Date	Disch-Desig	Parameter Desc	Reported DMR Value	Permit Limit	Vio %
01/31/2014	003-F	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	2.4	1.4	71%
01/31/2014	003-F	Nitrogen, ammonia total [as N] (DAILY MX, lb/d)	3.1	2.1	48%
01/31/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	443	115.62	283%
01/31/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	443	231.99	91%
01/31/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	155	3.8	3,979%
01/31/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	155	7.62	1,934%
01/31/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	650	291	123%
01/31/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	650	436.5	49%
01/31/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	271	115.62	134%
01/31/2014	007-A	Zinc, total recoverable (DAILY MX, ug/L)	271	231.99	17%
01/31/2014	007-A	Lead, total recoverable (MO AVG, ug/L)	5.26	3.8	38%
01/31/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	550	291	89%
01/31/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	550	436.5	26%
02/28/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	310	115.62	168%
02/28/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	310	231.99	34%
02/28/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	64.4	3.8	1,595%
02/28/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	64.4	7.62	745%
02/28/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	560	291	92%
02/28/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	560	436.5	28%
02/28/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	449	115.62	288%
02/28/2014	007-A	Zinc, total recoverable (DAILY MX, ug/L)	449	231.99	94%
02/28/2014	007-A	Lead, total recoverable (MO AVG, ug/L)	5.87	3.8	54%
02/28/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	1000	291	244%
02/28/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	1000	436.5	129%
03/31/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	229.5	115.62	98%
03/31/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	343	231.99	48%
03/31/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	23.3	3.8	513%
03/31/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	33.3	7.62	337%
03/31/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	335	291	15%
03/31/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	280	115.62	142%
03/31/2014	007-A	Zinc, total recoverable (DAILY MX, ug/L)	373	231.99	61%
03/31/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	665	291	129%
03/31/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	730	436.5	67%
03/31/2014	010-A	Solids, total suspended (MO AVG, mg/L)	35	30	17%
04/30/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	358	115.62	210%

04/30/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	358	231.99	54%
04/30/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	500	291	72%
04/30/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	500	436.5	15%
04/30/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	332	115.62	187%
04/30/2014	007-A	Zinc, total recoverable (DAILY MX, ug/L)	332	231.99	43%
04/30/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	470	291	62%
04/30/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	470	436.5	8%
05/31/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	393	115.62	240%
05/31/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	393	231.99	69%
05/31/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	655	291	125%
05/31/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	860	436.5	97%
05/31/2014	007-A	pH (MINIMUM, SU)	4.65	6	
05/31/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	403	115.62	249%
05/31/2014	007-A	Zinc, total recoverable (DAILY MX, ug/L)	403	231.99	74%
05/31/2014	007-A	Lead, total recoverable (MO AVG, ug/L)	11.5	3.8	203%
05/31/2014	007-A	Lead, total recoverable (DAILY MX, ug/L)	11.5	7.62	51%
05/31/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	655	291	125%
05/31/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	860	436.5	97%
06/30/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	140	115.62	21%
06/30/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	20.3	3.8	434%
06/30/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	20.3	7.62	166%
07/31/2014	002-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	16	12	33%
07/31/2014	002-A	Nitrogen, nitrate total [as N] (MO AVG, mg/L)	28	26.3	6%
07/31/2014	003-A	pH (MINIMUM, SU)	5.02	6	
07/31/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	410	115.62	255%
07/31/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	410	231.99	77%
07/31/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	24	3.8	532%
07/31/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	24	7.62	215%
07/31/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	610	291	110%
07/31/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	710	436.5	63%
07/31/2014	007-A	pH (MINIMUM, SU)	4.72	6	
07/31/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	250	115.62	116%
07/31/2014	007-A	Zinc, total recoverable (DAILY MX, ug/L)	250	231.99	8%
07/31/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	755	291	159%
07/31/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	850	436.5	95%
07/31/2014	010-A	pH (MAXIMUM, SU)	9.47	9	
07/31/2014	SUM-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	16	12	33%
07/31/2014	SUM-A	Nitrogen, nitrate total [as N] (MO AVG, mg/L)	28	26.3	6%
08/31/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	380	115.62	229%
08/31/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	380	231.99	64%
08/31/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	20	3.8	426%
08/31/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	20	7.62	162%
08/31/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	490	291	68%
08/31/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	490	436.5	12%

08/31/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	180	115.62	56%
08/31/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	600	291	106%
08/31/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	600	436.5	37%
09/30/2014	006-A	Zinc, total recoverable (MO AVG, ug/L)	560	115.62	384%
09/30/2014	006-A	Zinc, total recoverable (DAILY MX, ug/L)	560	231.99	141%
09/30/2014	006-A	Lead, total recoverable (MO AVG, ug/L)	99	3.8	2,505%
09/30/2014	006-A	Lead, total recoverable (DAILY MX, ug/L)	99	7.62	1,199%
09/30/2014	006-A	Solids, total dissolved (MO AVG, mg/L)	1200	291	312%
09/30/2014	006-A	Solids, total dissolved (DAILY MX, mg/L)	1200	436.5	175%
09/30/2014	007-A	Zinc, total recoverable (MO AVG, ug/L)	150	115.62	30%
09/30/2014	007-A	Lead, total recoverable (MO AVG, ug/L)	4.4	3.8	16%
09/30/2014	007-A	Solids, total dissolved (MO AVG, mg/L)	1000	291	244%
09/30/2014	007-A	Solids, total dissolved (DAILY MX, mg/L)	1000	436.5	129%
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%