Date Submitted: <u>9/30/19</u>

US EPA Integrated Compliance Information System-NPDES

Date Entered _____

ICIS-NPDES

EA Initials:	LP	PERMIT SCHEDULE CODING FORM
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PERMITS

NPDES PERMIT #: $AR_{0000752}$

Document Link:

PERMITTEE NAME: <u>El Dorado Chemical Company</u>

	C		
TRANS CODE	C	TRANS CODE	С
NARRATIVE CONDITION	2	NARRATIVE CONDITION	
DESCRIPTION	-	DESCRIPTION	
NARRATIVE CONDITION	P	NARRATIVE CONDITION	Р-
TYPE-NUMBER	1	TYPE-NUMBER	1-
PERMIT EVENT CODE/	02999	PERMIT EVENT CODE/	
DESCRIPTION		DESCRIPTION	
PERMIT SCHEDULE DATE	7/31/17	PERMIT SCHEDULE DATE	
ACTUAL DATE	7/31/19	ACTUAL DATE	
REPORT RECEIVED DATE	<u>8/1/19</u>	REPORT RECEIVED DATE	
COMMENTS	Comments must be included below to describe the event.	COMMENTS	Comments must be included below to describe the event.
	C		C
TRANS CODE	<u> </u>	TRANS CODE	
NARRATIVE CONDITION		NARRATIVE CONDITION	
DESCRIPTION		DESCRIPTION	
NARRATIVE CONDITION	P-	NARRATIVE CONDITION	Р-
TYPE-NUMBER		TYPE-NUMBER	
EVENT CODE/		EVENT CODE/	
DESCRIPTION		DESCRIPTION	
PERMIT SCHEDULE DATE		PERMIT SCHEDULE DATE	
ACTUAL DATE		ACTUAL DATE	
REPORT RECEIVED DATE		REPORT RECEIVED DATE	
COMMENTS	Comments must be included below to describe the event.	COMMENTS	Comments must be included below to describe the event.
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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

ICIS-NPDES NARRATIVE CONDITION CODING FORM

PERMITS

NARRATIVE CONDITION **DESCRIPTIONS**

Common Narrative Condition Descriptions				
Biosolids Program Report	Permit Schedule			
Capacity, Management, Operation and Maintenance (CMOM)	Pretreatment Performance Summary Report			
Construction Schedule	Storm Water MS4 Program Report			
Inflow and infiltration	Toxicity Identification/Remediation Evaluation			

(See Tables/Schedule Descriptions for more descriptions.)

NARRATIVE CONDITION EVENT CODES/DESCRIPTIONS

Schedule Event Code	Common Schedule Event Desc	Schedule Event Code	Common Schedule Event Desc
CS031	Achieve Final Compliance With All Obligations	90008	Delinquent DMR(s)
	Under This order		
CS017	Achieve Final Compliance With Emission or	90108	Delinquent Report
00303	Discharge Limits Adopt Local Limits	62199	Develop Storm Water Pollution Prevention Plan
00303	Adopt Local Lillins	62199	(SWPPP)
00403	Advertise for Bids	00301	Dry Weather Overflow Report
08099	Alternate Power Source	06599	Hire a Consultant/Professional Engineer
74905	Apply for Permits	59399	Hire Additional Staff
43199	Apply for Storm Water Permit	59299	Hire Certified Operator
110MS	Biosolids Analysis Report	12099	Industrial User Report
10599	Biosolids Monitoring Report	50599	Industrial User Survey
91099	Bypass Elimination	01499	Initiate Drawings and Specifications
08599	Bypass Elimination Schedule	PR010	MS4 Program Report
05199	Cease Discharge	04701	Obtain Permits
401SC	CMOM Plan	00105	Overflow/Bypass Information
989ME	Collection System Plans	CS001	Pay Required Civil Penalty Amount
CS027	Commence Required SEP	SEP99	Pay Required Contribution to SEP
CS015	Commence Required Work or On-Site Construction	CS003	Pay Required Stipulated Penalty Amount
CS028	Complete Required SEP	001LA	Payment of Permit Fees
CS016	Complete Required Work or On-Site Construction	CS013	Permit Application
148IN	Complete Sewer Connections	CS011	Plan, Report, or Scope of Work
82199	Complete Sewer System Evaluation	PR001	Pretreatment Performance Summary Report
41099	Complete SIU Inspections	60899	Pretreatment Program Modification
40599	Complete SIU Permits	82299	Sewer System Evaluation Report
		CS010	Status/Progress Report
01999	Complete Toxic Reduction Evaluation (TRE)	52399	Sewer Use Ordinance
013AR	Corrected DMR(s)	21599	Special Study
60799	Corrective Action Completed	34099	Study Plan
60699	Corrective Action Plan	02199	Toxic Reduction Evaluation (TRE) Plan
91299	Corrective Action Plan	96299	Toxics Pollutant Study
		02999	Toxics Report

(See ...\Tables\Schedule Events.xlsx for more descriptions.)