



May 21, 2019

Delmar Reppond, General Manager
El Dorado Chemical Company
4500 North West Avenue
El Dorado, AR 71730

**RE: NPDES Permit Number: AR0000752, AFIN: 70-0040
Whole Effluent Toxicity Test Lab Error**

Dear Mr. Reppond:


The Department has conducted a review of the Whole Effluent Toxicity (WET) tests performed by American Interplex Corporation from September 2016 to January 2019. The review revealed that acute WET tests for *Pimephales promelas* and *Daphnia pulex* conducted for Outfalls 006 and 007 during June 15, 2018, July 7, 2018, August 18, 2018, and September 5, 2018, as required by NPDES Permit No. AR0000752 (Permit) deviated from the 48-hour test duration specified in EPA-821-R-02-012. These tests have been deemed invalid.

Please correct the TX6-Q Discharge Monitoring Reports (DMRs) for June 30, 2018, July 31, 2018, August 31, 2018, September 30, 2018 and TX7-Q DMRs for June 30, 2018, July 31, 2018, August 31, 2018, and September 30, 2018, to reflect "NODI M – Laboratory Error" and attach this letter as your non-compliance report. These corrections should be made by June 1, 2019.

Reporting Laboratory Error on your DMR is a violation of Part I, Section A of your Permit. The Department has elected not to take formal enforcement action for these violations of your Permit.

Thank you for your attention to this matter. If you have questions or would like to discuss this matter further, please feel free to contact Layne Pemberton at 501-682-0664, or by e-mail at pemberton@adeq.state.ar.us.

Sincerely,


Richard Healey
Enforcement Branch Manager
Office of Water Quality

cc: David Sartain, Environmental Coordinator, EDCC (dsartain@edc-ark.com)
John Overbey, Laboratory Director, American Interplex Corporation
(joverbey@americaninterplex.com)