

**Water Enforcement Meeting between  
El Dorado Chemical & ADEQ  
April 23, 2015  
10:00-10:30 A.M.  
NPDES Permit Number: AR0000752    AFIN: 70-00040**

Present: Scott McDonald, Mo Shafii, Deb Gerst, Richard Healey, Loretta Reiber, Layne Pemberton, ADEQ; David Sartain, Kelly Oliver, El Dorado Chemical; Vince Blubaugh, Amanda Gallagher, GB Mc & Associates.

Mr. Healey welcomed the group and introductions were made. He invited El Dorado Chemical personnel to lead the meeting. Mr. Sartain said they wanted to discuss Discharge Monitoring Reports (DMRs). Ms. Gallagher added that they were interested in getting set up for Net DMR. It was explained that until the permit was reissued, they would not be able to use Net DMR.

Mr. Shafii explained that the permit expired June 30, 2014. He mentioned that 4-5 months before it expired, the permit was modified. He said that the permit had been appealed and was, therefore, stayed. Regulation "A" explains that nothing can be done to that permit because of the appeal process. He said federal law requires that they refer to the 2002 permit. He continued by saying that Act 954 explains that an old permit appealed would be on hold and any modification could not affect the permit because the permit was expired.

Mr. Shafii explained that their permit would have a variance. Mr. Shafii said the 2002 permit will have outfall "010. He reminded the facility to report their Discharge Monitoring Reports (DMRs). He asked them to send both the preprinted DMRs and the self-generated DMRs so that ADEQ could get all the parameters entered. The Facility agreed to report under the old, as well as the new permit to prevent any missing parameters.

Mr. Blubaugh said the Total Maximum Daily Load (TMDL) is the big thing to be done. He said he needed to look at that. Ms. Reiber said she would also talk to Lyon Oil. Mr. Shafii explained that the TMDL is not correct. He said they must use a different number, and they must justify how they use the critical flow.

Mr. Shafii reminded Mr. Blubaugh that ADEQ could help revise the TMDL if needed. Mr. Blubaugh said they needed a modification. Mr. Shafii said that they could agree to a Consent Administrative Order (CAO). He explained that there would be interim limits with which to comply.

Mr. Shafii said that per the EPA, the facility must send both DMRs due to the appeal process, modification and expiration issues surrounding the permit. The Facility agreed to turn-in two sets of DMRs. The meeting was adjourned at 10:30 A.M.

Respectfully submitted,  
Deborah Gerst



A R K A N S A S  
Department of Environmental Quality

Facility: El Dorado Chemical

Permit #: ARO000752

Date: April 23, 2015

### MEETING ATTENDANCE

Name	Organization	Job Title	E-Mail Address	Telephone Number
SCOTT McDONALD	ADEQ	Enforcement Coordinator	McDonald@adeq.state.ar.us	501-682-0633
Mo Shafii	ADEQ	Assistant Chief	Shafii@adeq.state.ar.us	501-682-0616
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REMARKS: