

June 4, 2015

Layne Pemberton
Arkansas Department of Environmental Quality
Water Division - Enforcement Branch
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: El Dorado Chemical Company
NPDES Permit No. AR0000752
Response to NPDES Permit Effluent Violations Correspondence dated May 18, 2015

Mr. Pemberton:

El Dorado Chemical Company (EDCC) is in receipt of the correspondence from ADEQ dated May 18, 2015 requesting the submittal of corrected Discharge Monitoring Reports (DMRs) for missing parameters for Outfall 010 for the months of June-October 2014.

Up until the meeting with ADEQ on April 23, 2015, EDCC was of the understanding that the facility was operating under the permit modification that was effective April 1, 2007. Monitoring at all outfalls were performed in accordance with the associated permit requirements. DMR's were submitted to ADEQ for each monitoring period on pre-printed DMR's with the exception of Outfall 010. EDCC had received written approval from ADEQ to use a blank DMR form for Outfall 010 (Email from Amy Schulterman, ADEQ Water Enforcement, to Ms. Larken Pennington, EDCC personnel, dated October 23, 2015). Thus, EDCC would like to emphasize that the missing parameters have been submitted to ADEQ with the exception of the Acute WET Testing. Only Chronic WET testing has been completed at Outfall 010 due to the above reasoning. After our meeting on April 23, 2015, EDCC initiated Acute WET testing at Outfall 010 and will continue until such time the permit is renewed.

For your convenience, the corrected DMRs have been included with this correspondence. If you have any questions, please contact me at (870) 863-1400.

Sincerely,

Edward L Pearson

Environmental Technician

Enclosures

Larken Pennington

From:

Schluterman, Amy [SCHLUTERMAN@adeq.state.ar.us]

Sent:

Wednesday, October 23, 2013 3:28 PM

To:

Larken Pennington

Subject:

RE: El Dorado Chemical Co. DMR preprints 2013-2014

Attachments:

Blank DMR Form (Fillable).pdf

Larken,

Because the DMRs cannot be generated by our ICIS system the Assistant Chief has given us permission to send you a blank DMR for reporting the necessary permit limits for Outfall 010. Please also include a copy of the lab reports with the DMRs. I apologize for this taking so long to clear up. If there is anything else you need, please let me know.

Thanks.

Amy Schluterman Water Enforcement, ADEQ 501-682-0633

From: Larken Pennington [mailto:LPennington@edc-ark.com]

Sent: Tuesday, October 22, 2013 3:31 PM

To: Schluterman, Amy

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Amy,

Since the government shutdown is over, when can we get the preprinted DMR forms?

Thanks,

Larken Tennington

El Dorado Chemical Company **Environmental Technician** Office: 870-863-1125

Cell: 870-312-1752

Email: lpennington@edc-ark.com

From: Schluterman, Amy [mailto:SCHLUTERMAN@adeq.state.ar.us]

Sent: Wednesday, October 16, 2013 9:21 AM

To: Larken Pennington

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Larken,

I do not have any blank forms to send you and we are not able to accept the forms unless they are the preprinted versions that the Department generates. Until the government shutdown is over we will not be able to generate any preprinted forms.

From: Larken Pennington [mailto:LPennington@edc-ark.com]

Sent: Tuesday, October 15, 2013 3:31 PM

To: Schluterman, Amy

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Amy,

Do you have a blank DMR that you can send me? That way I can go ahead and submit all of the data.

Thanks,

Larken Tennington

El Dorado Chemical Company Environmental Technician

Office: 870-863-1125 Cell: 870-312-1752

Email: lpennington@edc-ark.com

From: Schluterman, Amy [mailto:SCHLUTERMAN@adeq.state.ar.us]

Sent: Wednesday, October 09, 2013 8:58 AM

To: Larken Pennington

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Larken,

The system that generates the DMRs is still not operational because of the government shutdown. I would go ahead and submit what you have and hold onto all your data and we can have you submit a corrected DMR once the preprints are have been generated.

Thanks, Amy

From: Larken Pennington [mailto:LPennington@edc-ark.com]

Sent: Wednesday, October 09, 2013 8:53 AM

To: Schluterman, Amy

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Amy,

Just checking back with you to see if anything has been done to correct the DMR's. Since I do not have the correct DMR's, what do you advise me to do for completing Septembers DMR's?

Thanks,

Larken Pennington

El Dorado Chemical Company

Environmental Technician Office: 870-863-1125

Cell: 870-312-1752

Email: lpennington@edc-ark.com

From: Schluterman, Amy [mailto:SCHLUTERMAN@adeq.state.ar.us]

Sent: Tuesday, October 01, 2013 3:29 PM

To: Larken Pennington

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Larken,

We do not have them corrected yet and unfortunately the program that generates the DMRs is currently down because of the government shutdown. As soon as the system is back up we should be able to get corrections made and DMRs generated for you.

Thanks, Amv

From: Larken Pennington [mailto:LPennington@edc-ark.com]

Sent: Tuesday, October 01, 2013 3:04 PM

To: Schluterman, Amy

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Amy,

I am checking to see if you have our DMR's corrected yet.

Thanks,

Larken Tennington

El Dorado Chemical Company Environmental Technician Office: 870-863-1125

Cell: 870-312-1752

Email: lpennington@edc-ark.com

From: Schluterman, Amy [mailto:SCHLUTERMAN@adeq.state.ar.us]

Sent: Thursday, September 26, 2013 3:22 PM

To: Larken Pennington

Subject: RE: El Dorado Chemical Co. DMR preprints 2013-2014

Larken,

Yes, I did receive your email. I am just trying to make sure they are correct before making corrections.

Thanks, Amy From: Larken Pennington [mailto:LPennington@edc-ark.com]

Sent: Thursday, September 26, 2013 3:12 PM

To: Schluterman, Amy

Subject: FW: El Dorado Chemical Co. DMR preprints 2013-2014

Amy,

I am just making sure you received the email below sent on September 19. Please assist.

Thanks,

Larken Tennington

El Dorado Chemical Company Environmental Technician Office: 870-863-1125

Cell: 870-312-1752

Email: lpennington@edc-ark.com

From: Larken Pennington

Sent: Thursday, September 19, 2013 4:35 PM

To: 'schluterman@adeq.state.ar.us'

Subject: El Dorado Chemical Co. DMR preprints 2013-2014

Amy,

Attached are the DMR preprints for September 2013 that were emailed to El Dorado Chemical Co. in April 2013. Will you please check the DMR's against the permit? The parameters for Discharge Number 010-A are not all there. We received DMR preprints until March 2014; these will need to be edited as well. Please advise.

Thanks,

Larken Tennington

El Dorado Chemical Company Environmental Technician Office: 870-863-1125

Cell: 870-312-1752

Email: lpennington@edc-ark.com

From: (870) 863-1400 (Eddie Pearson ELDORADO CHEMICAL COMPANY 4500 NORTH WEST AVE Origin (D: ELDA ELDORADO, AR 71730 SHIP TO: (501) 682-0664 Layne Pemberton **ADEQ - Water Enforcement 5301 Northshore Drive NORTH LITTLE ROCK, AR 72118**

Fed∄x.

Ship Date: 08JUN15 ActWgt: 0.5 LB CAD: 5887030/INET3610

Delivery Address Bar Code

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TRK# 7737 7877 5720

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