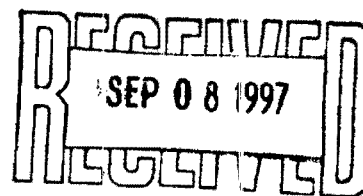




September 3, 1997

Mr. Jerry Delavan, P.G.
Arkansas Department of Pollution
Control and Ecology
Water Division
P.O. Box 8913
Little Rock, Arkansas 72219-8913



RE: Consent Administrative Order No. LIS 95-070

Dear Mr. Delavan:

Paragraph 22 of the referenced CAO required El Dorado Chemical Company ("EDC") to upgrade the Boiler Feed System ("BFS") with a minimum expenditure of \$125,000.00 and to document the level of reduction of sulfates in the facility's wastewater effluent. The sulfate reduction was to be based upon a comparison of sulfate content in the effluent two years prior to the initiation of the BFS upgrade and one year after the completion of the upgrade, along with a comparison of sulfuric acid usage in the BFS for the same time frame.

Per your request, I am enclosing an itemized listing of expenditures for this project totaling \$208,681.00. The BFS upgrade was completed in November, 1995. A two year baseline from November, 1993 to November, 1995 for sulfuric acid usage and effluent sulfate level was calculated and, after tracking these parameters for six months (May, 1996 to November, 1996), it was evident that EDC failed to meet the 50% sulfuric acid reduction and 25% effluent sulfate reduction criteria required in the CAO. EDC timely notified ADPC&E of the results of the BFS upgrade in a letter dated May 13, 1997, and indicated that the alternate Waste Minimization Plan would be implemented. That plan, prepared by Woodward-Clyde Consultants, was forwarded to ADPC&E on June 26, 1997.

Should you have additional questions, please do not hesitate to contact me at (405) 235-4546.

Sincerely,

A handwritten signature in cursive script that reads "John M. Carver".

John M. Carver
Director Safety and
Environmental Compliance

JMC/tlc

Enclosure

cc: Byron Smith, EDC
Ray Quick, W-C

jcg\delavan_97.903

Boiler House Feedwater Pretreatment Project:
AFE No. 818-1891.540

Date updated: 11/16/95

Project Spending

<u>Item</u>	<u>Date</u>	<u>Req. No.</u>	<u>Vendor</u>	<u>Dollars</u>	<u>P.O. No.</u>
1.	6/28/95	16835	ChemTreat	72,802.65	403672
Model TEDV - 66-3 Strong Base Anion Unit Includes: (2) 7000A controllers, (2) 3" badger flow meters, 140 cubic feet of anion resin, ejector, skid mount, caustic pump, ASME code stamps, Regen flow control, (2) flow output controllers, and caustic day mix tank Price does not include tax and delivery. Delivery is included on resin.					
2.	7/18/95	17731	Sepco	8,252	403808
Two Goulds Pumps (3196-STX 2x3x6) and (2) 20 hp 3500 RPM motors for Anion Unit. Original requisition for \$10,052 to Masander Engineered Equipment. Jim Seymore found better price at Sepco in Shreveport. Savings of about \$900 per pump and motor. Delivery before 9/10/95. Price does not include delivery and tax.					
3.	7/25/95	17735	ChemTreat	24,000	212422
Cation Resin (Resintech CG8-H) 400 cubic foot. Price includes delivery, but not taxes.					
4.	7/28/95	17738	Tankinetics	7,821	403830
c/o Corrosion Piping 12' ID x 9' - 6" tall FRP degasifier tank. Flat top and flat bottom. Includes 4 hold down lugs, 3 lifting lugs, and 24" manway. Nozzles: 150 lb. flanged plate gusseted, top: 8" inlet, 8" vent, 2" inst., side: 6" outlet. Delivery 4 - 6 weeks after order. FOB Harrison, AR approximately \$600. Delivery was \$600.00					
5.	7/31/95	17739	Eurotherm	2,320	403855
Process Automation Controller for degasifier tank level control. Can also be used for treated water storage tank level control and treated water flow totalizer. Controller Model No.: T640/MAINS-/HIB/HIB/M002/T710/-/-/EN. Delivery is approx. 6 weeks.					
6.	8/23/95	17759	A-1 Vacuum Truck Service, Inc.	405	403968
Vacuum truck for cation unit No.1 resin removal and disposal on 8/29/95.					
7.	8/23/95	17760	Waste Management of Arkansas	480 est.	403983
Rental of 30 cubic yard container for cation resin dewatering and disposal. To be delivered on 8/28/95.					
8.	8/23/95	17761	Tri-State	2,990	403959
(2) 2", (6) 4", and (2) 6" ABZ wafer butterfly valves EPDM lined with hand lever operators. (2) 4" wafer style S.F.					

9.	8/24/95	17764	Talley Electric	1,599.60	403964
			(2) 20 hp starters for anion pumps. Delivery within 2 weeks.		
10.	9/5/95	17773	A-1 Vacuum	435	404042
			Vacuum truck for cation unit No.2 resin removal and disposal on 9/12/95.		
11.	9/15/95	19641		1400 est	
			Electrical equipment for boiler house modifications.		
12.	9/25/95	17786	Liberty Supply Inc.	15,679.32	404096
			Schd 10s 316 SS pipe and fittings from degasifier tank and anion units.		
13.	9/25/95	17787	Milam Construction	30,000 est.	404995
			Contractor to install new system.		
14.	9/25/95	17789	Cortrol	731.70	213313
			Material to repair bulk NaOH FRP tank.		
15.	9/27/95	17792	Stone Auto	161.50	213358
		17792	Sherwin Will.	58.72	213361
			Supplies for FRP tank repair.		
16.	9/29/95	17794	Rainwater	659.23	404176
			PVC pipe and fittings.		
17.	9/29/95	17795	Bradshaw	176.95	404175
			Nuts, bolts, and washers.		
18.	9/29/95	17796	Triplex	712.69	404142
			Gaskets.		
19.	9/29/95	17797	Evers Elec.	7500 est.	
			Electrical contractor.		
20.	10/2/95	17798	Cortrol	62.40	404165
			CL-200 adhesive for FRP tank repair.		
21.	10/3/95	17804	Rainwater	7.52	404199
			PVC fittings.		
22.	10/3/95	17805	P&E	69	404198
			4" 90 degree elbows (2)		
23.	10/6/95	17811	Liberty	227.45	404273
			Check valves and gate valves.		
		17811	McMaster Carr	297.40	404274
24.	10/6/95	17812			
			304 SS pipe and fittings. Got from stock. Not ordered.		
25.	10/6/95	17813	Rainwater	100 est.	404258
			Schd 40 PVC pipe and fittings.		
26.	10/12/95	17816	Talley	100 est.	
			Start/stop kit for starters of Req. 17764.		
27.	10/17/95	17821	Rainwater	8.57	213537
			3" Schd 80 PVC flange.		
28.	10/17/95	17822	Rainwater	114.75	213551
			Schd 80 PVC pipe and fittings.		
29.	10/19/95	17824	Liberty	1212	213608
			4" Schd 10s 316 SS pipe (60') and 2 tees.		
30.	10/17/95	17825	Sequentia	509.25	404427
			Not yet ordered for fiberglass siding.		
31.	10/20/95	17828	Rainwater	27.95	213633

Sched 80 PVC fittings.				
32.	10/20/95	17829	Change Order for Req. 11773 for \$105	213645
33.	10/23/95	17831	Weeks Sup. 150 est. Electrical supplies.	
34.	10/24/95	17836	Milam Const 15,000 est.	213667
35.	10/27/95	17837	Liberty 957	404412
36.	10/30/95	17838	TriState 200 est.	213726
37.	10/30/95	17839	P&E 352.20	213710
38.	10/30/95	17840	Rainwater 280 est. PVC fittings. With Req. 24641.	404435
39.	10/30/95	17841	Ind. Mill 435	404433
40.	10/31/95	17842	Barker 360.99	404457
41.	10/31/95	17843	McMaster 112.29	404455
42.	11/1/95	17844	Mid-Am 134.72	404491
43.	11/8/95	17855	Rainwater 54.57	404544
44.	11/13/95	17863	Mal-tex 2764	
45.	11/14/95	17866	Delta Dist. Not on this project	6900
46.	11/15/95	17868	McMaster 315.20	404605
47.	10/95		EDC warehouse 6,043.52 stock parts for 10/95	

Total spending to date excluding delivery charges, taxes, EDC labor, and EDC stock parts for 11/95: \$ 208,681.14