



CHEMICAL COMPANY

May 13, 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 95-079

Paragraph 22 of the referenced CAO adopted a Supplemental Environmental Project ("SEP") which required El Dorado Chemical Company ("EDC") to upgrade the Boiler Feed System within 120 days and document, after the upgrade has been in effect for one year, the level of reduction of sulfates in the facility's wastewater effluent. The Boiler Feed System SEP has been completed, and the first year's operations have been evaluated. The sulfate reduction targets have not been realized, and EDC has initiated the alternative SEP outlined in Paragraph 23 of the CAO, i.e., implementation of a Hazardous Waste Minimization Plan following EPA's "Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program", 58 FR 31114 (May 28, 1993).

Although EDC has not yet received notice from ADPC&E requesting the Waste Minimization Plan, EDC has retained the services of Woodward-Clyde Consultants to prepare the plan, which should be available for your review by July 1, 1997.

Should you need any additional information at this time, 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

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

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