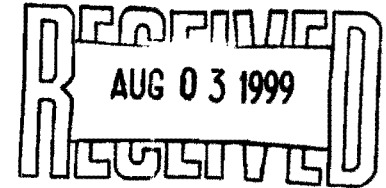


August 2, 1999



Mo Shafii  
NPDES Permitting Branch, Water Division  
Arkansas Department of Environmental Quality  
PO Box 8913  
Little Rock, AR 72219-8913

Re: Sumbittal of NPDES Application AR0000752  
GBM<sup>©</sup> No: 2042-99-050

Dear Mr. Shafii:

On behalf of El Dorado Chemical Company (EDCC), please find enclosed the permit application package for the above referenced permit. This permit application is being submitted in compliance with CAO 98-119 Section 2g, of the Order and Agreement. As has been discussed with you, there are several issues for which we offer clarification. These are as follows:

- 1) Outfall 002 is an emergency overflow for the 1-acre aeration basin. It discharges partially treated non-process, process, and industrial activity storm water waste streams. This Outfall discharges infrequently, and is intended to discharge in the event of flood conditions (since 1996, Outfall 002 has discharged 3 times). For the purpose of providing priority pollutant data, a discharge from Outfall 002 was simulated by pulling samples from the 50-acre equalization basin influent. It should be noted that these samples do not represent actual flow conditions that would be necessary to cause a discharge from Outfall 002.
- 2) Outfall 004 discharges untreated storm water. Although the sampling was conducted, due to laboratory error, no pesticide analyses were performed during the preparation of the application package. As conveyed to you by phone on July 29, 1999, pesticide analysis results for Outfall 004 will be forwarded to ADEQ upon completion of storm water sampling. The sampling of Outfall 004 will be conducted during the next storm event that meets storm sampling criteria.
- 3) Outfalls 005, 006, and 007 discharge untreated storm water. These outfalls are not covered by NPDES permit AR0000752. They are currently permitted by storm water permit ARR00B036. With this

August 2, 1999

Page 2

application, EDCC is requesting coverage of these Outfalls under AR0000752.

- 4) As agreed upon by you by phone on June 3, 1999, priority pollutant scans were performed for Outfalls 001, 002, and 004. A single sampling event, associated test method, and the MDL were inputted for each pollutant required in ADEQ's PPS Form. Multiple sample results for single parameters were summarized in EPA Form 2C for Outfalls 001 and 002, and in EPA Form 2F for Outfall 004. All laboratory results, QAQC's, and Chain of Custodies for all priority pollutant parameters are included with this application.
- 5) Please note that the application contains two potential outfalls directly to the Ouachita River via direct pipeline.

We very much appreciate your cooperation on these issues. If you have any questions, do not hesitate to contact Byron Smith of EDCC at (870) 863-1498 or me.

Sincerely,  
GBM<sup>c</sup> & Associates



Vince Blubaugh  
Principal

Enclosure

cc: Art Riddle, Arkansas Department of Environmental Quality w/o enclosure  
Belinda Colby, Arkansas Department of Environmental Quality w/o enclosure  
Keith Brown, Arkansas Department of Environmental Quality w/o enclosure  
Byron Smith, EDCC w/enclosure  
Ralph Freeman, EDCC w/enclosure  
John Carver, EDCC w/ enclosure  
Chuck Nestrud, Chisenhall, Nestrud and Julian, PA w/enclosure