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Ms. Loretta Reiber
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Discharge Permit Number AR0000752, AFIN 70-00040 El Dorado Chemical Company Permit Renewal.

Ms. Reiber,

Biologists with the Arkansas Game and Fish Commission (AGFC) have reviewed the public notice for the permit renewal of the El Dorado Chemical Company (EDCC) facility. We offer the following comments and questions to the Arkansas Departments of Environmental Quality (ADEQ):

We have concerns that the highest values in the mineral samples are being thrown out as outliers without sufficient justification (i.e. page 47 of the Fact Sheet). Was a statistical outlier test performed, and if so, which one?

We continue to support the use of numerical criteria, such as concentration limits on metals and nutrients, especially in light of recent effluent violations (letters from ADEQ to EDCC dated January 23rd and February 23rd 2017.) The reduction of recoverable zinc limits to monitoring and reporting quarterly needs more justification. The Department appears to acknowledge this criteria has a reasonable potential to be exceeded, but yet is reducing the limits.

The temperature limit is planned to be removed due to a temperature study conducted by the permittee (page 4 and item 13.B of the Fact Sheet). A search of the available records for this permit yielded no temperature studies. We would like to request a copy of this temperature study.

The AGFC greatly appreciates the opportunity to comment on this proposed permit renewal. We look forward to continuing to work with ADEQ to ensure that the resources of the state are managed wisely.

Sincerely,

Justin Stroman
Federal Regulatory Biologist
Arkansas Game and Fish Commission

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The Arkansas Game and Fish Commission's mission is to conserve and enhance Arkansas's fish and wildlife and their habitats while promoting sustainable use, public understanding and support.