

ADEQ

ARKANSAS
Department of Environmental Quality

June 12, 2007

Greg Withrow
General Manager
El Dorado Chemical Company
P.O. Box 231
El Dorado, AR 71731

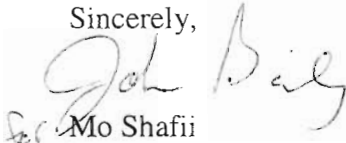
RE: NPDES Permit No. AR0000752, AFIN 70-00040
Stormwater Flow Study for Combined Outfalls 006 and 007

Dear Mr. Withrow:

The Department has reviewed your correspondence dated May 22, 2007, requesting permission to perform a stormwater flow study to combine Outfalls 006 and 007. The Department has no objections at this time to the protocol outlined in your letter.

If you have any questions, please feel free to contact Loretta Reiber, P.E., at (501) 682-0612.

Sincerely,



Mo Shafii
Permits Branch Manager
Water Division

MS:JB:lr

cc: Chuck Campbell, GBMc & Associates

4500 NORTH WEST AVE. • P. O. BOX 231 • EL DORADO, AR 71731 • (870) 863-1400

EL DORADO**CHEMICAL COMPANY**

NPDES PERMIT FILE

NPDES # AR0000752AFIN # 70-00040

Permit PN

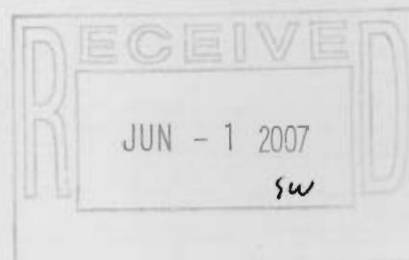
✓ Correspondence

Technical Backup

Date Scanned

May 22, 2007

Mr. Mo Shafii
 Manager, Permits Branch
 Water Division
 Arkansas Department of Environmental Quality
 P.O. Box 8913
 Little Rock, AR 72219-8913

6-1-07 sw

RE: Proposed Extended Storm Water Flow Study – Combined Outfalls 006+007
 El Dorado Chemical Company
 NPDES Permit No. AR0000752
 GBM^c No. 2042-99-010

Dear Mr. Shafii:

El Dorado Chemical Company (EDCC) submitted a Storm Water Flow Study report to ADEQ on September 21, 2006 summarizing the findings of an extensive investigation of the flow relationship between facility storm water outfalls 006/007 and the receiving stream, an unnamed tributary to Flat Creek. That study conducted by GBM^c & Associates (GBM^c) occurred over a sixteen-month period during which flows were monitored at both outfalls and a location on the unnamed tributary at the facility property boundary.

Subsequent to the completion of the Storm Water Flow Study, EDCC purchased additional property including the unnamed tributary approximately one-half mile east of the previous boundary. EDCC is considering the creation of a new storm water outfall 008 that would eliminate current outfalls 006 and 007 by combining them into a common pipeline that discharges to the unnamed tributary near the eastern property boundary. The new outfall 008 would discharge at a point on the tributary with a much larger watershed than existed for the September 2006 study (increase of 93%) and thus greater storm water flows in the tributary are anticipated. Attached is a topographic map showing the current and potential outfalls, the previous study and proposed study monitoring locations on the unnamed tributary, and the associated watershed areas.

As you recall, the purpose of the Storm Water Flow Study was to document the ratios of the facility outfall flows to the natural flows of the unnamed tributary during storm events to establish appropriate permit limits based on actual data. Because the proposed new outfall will negate the flow relationships developed during the 2005-2006 study, EDCC requests authorization of a new study to determine the storm event flow characteristics of a new outfall and discharge location. The proposed study will follow the same protocols described in the July 15, 2004 Storm Water Flow Study Plan; specifically, flows will be monitored at EDCC outfalls 006 and 007 and simultaneously at the unnamed tributary near the potential new outfall 008. Direct measurement of flow associated with

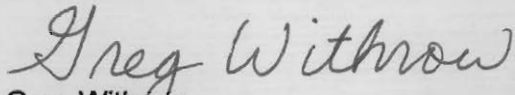
Mr. Mo Shafii
May 22, 2007
Page 2

a minimum of three storm events will be used to develop a flow/level rating curve for the tributary at the new monitoring location. The EDCC contribution to storm flows in the unnamed tributary will be subtracted from the total measured flow to determine "background" flow for use in statistical evaluation of the discharge to receiving stream ratios.

EDCC is prepared to initiate the study immediately upon your approval. The study duration will depend on collection of valid data from at least twelve storm events. Upon completion of the data collection phase, EDCC will analyze the information and prepare a summary report of the findings to ADEQ.

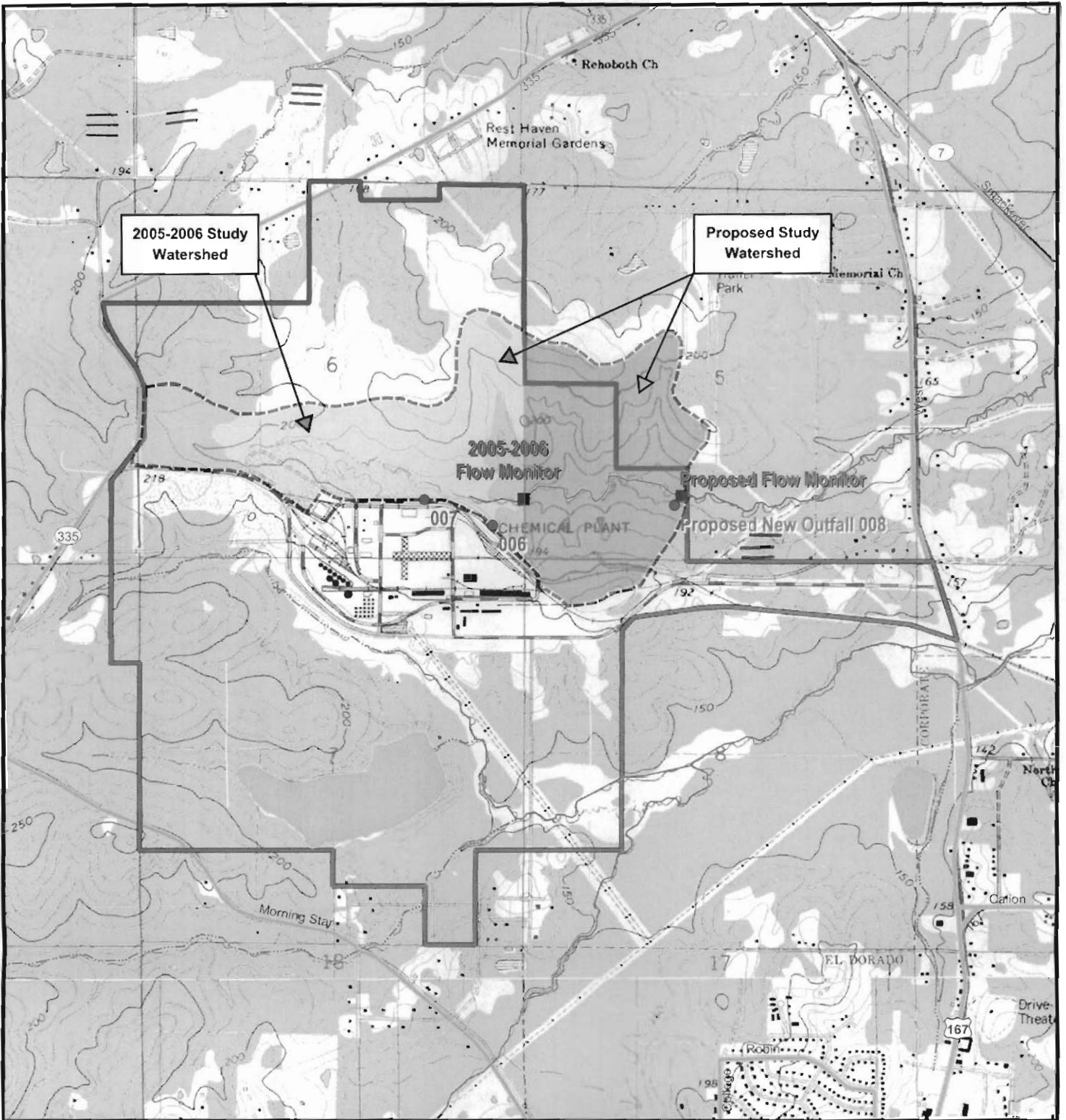
We appreciate your consideration of this matter and are available to answer any questions you or your staff may have regarding this request. Please contact Chuck Campbell - GBM^c (501-847-7077) or me at 870-863-1400 if you need additional information.

Sincerely,
El Dorado Chemical Company



Greg Withrow
General Manager

cc: Martin Maner – ADEQ
John Carver – LSB
Chuck Campbell – GBM^c



- Flow Monitors
- Outfalls
- Proposed Study Watershed Boundary

