

Department of Environmental Quality

January 31, 2014

Mark Smith El Dorado Water Utilities P.O. Box 1587 El Dorado, AR 71731

Re: Control water for Whole Effluent Toxicity (WET) Testing

NPDES Permit No.: AR0050296 AFIN No.: 70-00729

Outfall: 010R

Mr. Smith,

The Department has reviewed the WET test report conducted for Outfall 010R, test dates December 10 - 17, 2013, and confirms the control failure resulting from receiving water toxicity.

In accordance with Part II.10.3.c.ii "...if the receiving water is unsatisfactory as a result of instream toxicity..., the permittee may substitute synthetic dilution water for the receiving water..."

Since the Department verified instream toxicity of the receiving water, for the remainder of the permit term, synthetic dilution water may be used for WET tests for NPDES Permit No.: AR0050296, Outfall 010R.

The Department is aware that the associated influent effluent streams for the joint pipeline collect samples on the same days and utilize the same sample of Ouachita River receiving water for all test controls and dilution waters; therefore:

In accordance with Part III.12.3.c.ii of NPDES Permit No.: AR0000647 (Lion Oil Company), Outfall 010, for the remainder of the permit term, synthetic dilution water may be used for WET tests.

In accordance with Part II.10.C.3.b of the Draft NPDES Permit No.: AR0001171 (GLCC-Central), Outfall 010, for the remainder of the permit term, synthetic dilution water may be used for WET tests.

In accordance with Part II.13.3.c.ii of NPDES Permit No.: AR0049743 (El Dorado Water – North), Outfall 010N, for the remainder of the permit term, synthetic dilution water may be used for WET tests.

In accordance with Part II.13.3.c.ii of NPDES Permit No.: AR0049743 (El Dorado Water – South), Outfall 010S, for the remainder of the permit term, synthetic dilution water may be used for WET tests.

In accordance with Part III.17.3.c.ii of NPDES Permit No.: AR0000752 (EDCC), Outfall 010, for the remainder of the permit term, synthetic dilution water may be used for WET tests.

If you have any questions please do not hesitate to call me at (501) 682-0666.

Best regards,

Mary Barnett

Ecologist Coordinator

Ecc: Chuck Hammock, Lion Oil – El Dorado Refinery

Randall Whitmore, Great Lakes Chemical - Central Plant

Greg Withrow, El Dorado Chemical Company

Russell McLaren, GBM^c & Associates Amy Schluterman, ADEQ Enforcement

Kevin Suel, ADEQ Enforcement Loretta Reiber P.E., NPDES Permits John Overbey, American Interplex