

ADEQ

ARKANSAS
Department of Environmental Quality

October 30, 2012

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

RE: NOEL reporting
Corrected DMR needed for July 2012 WET test, Outfall 007
Permit No: AR0000752, AFIN No: 70-00040

Dear Mr. Withrow,

For the July 2012 WET test it has been noted that the value reported on the DMR for the *P. promelas* (TOM6C) and *Daphnia pulex* (TOM3D) NOEL parameters are not in line with what is reported in the WET test report provided by the testing laboratory (Bio-Analytical).

The summary page provided by the testing laboratory for the WET test report also appears to be erroneous.

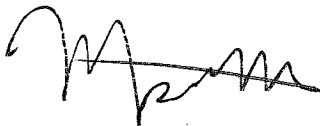
Table 1 Section 3.0 Results and Discussion on page 6 of 35 reports the percent survival for all 6 dilutions at 0.0% for both organisms.

Appendix C pages 24 of 35 and 25 of 35 both report significant differences from the control for all 6 dilutions for both organisms.

A corrected DMR is required for the July 2012 WET test. Please revise the NOEL parameters (TOM6C and TOM3D) to reflect the NOEL of 0% and submit the corrected DMR to the Department. Additionally please take steps to prevent this type of error in reporting for future tests.

Thank you for your attention with this matter. If you have any questions please call me at 501-682-0666 or e-mail me at barnett@adeq.state.ar.us.

Best Regards,



Mary Barnett
Ecologist

ECC: Michelle Bolenbaugh, Enforcement