

ADEQ

ARKANSAS
Department of Environmental Quality

April 8, 2011

Brent Parker
El Dorado Chemical Company
P.O. Box 231
El Dorado, AR 71731

RE: Response to EDCC's request for authorization to utilize the TRE dilution series in lieu of the current permit defined series for NPDES compliance WET testing until such time as the permit renewal is effective.

NPDES No. AR0000752

AFIN: 70-00040

Dear Mr. Parker:

After consultation with the NPDES Permitting and NPDES Enforcement sections, it has been determined that the revision of WET test dilution series for NPDES compliance can be considered upon the submittal of a request for a major permit modification.

Data submitted in the flow study conducted in 2006 would be considered new information according to 40CFR §122.62(a)(2). Therefore, modification of the current permit would be needed to revise WET test dilution series for NPDES compliance.

However, this request does not meet one of the specific categories in 40CFR §122.63 for minor permit modifications. Please contact NPDES permitting if you wish to move forward with a major permit modification.

If you have any questions, please contact myself or Sarah Clem.

Sincerely,



Mary Barnett
Ecologist
501-682-0666
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ECC: Loretta Reiber, NPDES Permitting
Cindy Garner, NPDES Enforcement
Greg Withrow, EDCC
Kyle Wimsett, EDCC
John Carver, LSB Industries
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