



ARKANSAS
Department of Environmental Quality

RESPONSE TO COMMENTS

This is the response to comments received from EPA about the draft permit.

Permit No.: AR0000752
Applicant: El Dorado Chemical Company
Prepared by: Loretta Reiber, P.E.
Date Prepared : April 10, 2006

The following comments have been received on the draft permit.

Letter from Miguel Flores to Martin Maner, P.E. dated February 3, 2006.

I. Response to issues raised

Required Changes

ISSUE #1

Applicable TMDL limits must be included in the permit for those outfalls which discharge to Flat Creek.

RESPONSE #1

Since the permit already contains WET limits, the NH₃-N TMDL limits are not necessary at this time. The NH₃-N limits in the current permit are based on water quality modelling. The water quality mineral limits in the current permit are more stringent than the TMDL limits. The ammonia and the mineral limits will therefore remain unchanged. Additionally, please note that in accordance with 40 CFR 122.62, when a permit is modified, only the conditions (i.e., Outfall 010) subject to modification are reopened.

Suggestions and Recommendations

ISSUE #2

EPA has several suggestions and recommendations for clarifying El Dorado Chemical Company's permit. These comments can be found in the permit file.

RESPONSE #2

1. Language has been included in Part III, #2 of the permit which states that except as outlined in Condition #6 of Part III, the permittee may only discharge to Outfalls 001, 004, 006, and 007 in emergency situations once discharge to the pipeline has commenced. The permittee is responsible for submitting documentation that an emergency situation requiring discharge to Outfalls 001, 004, 006, and 007 occurred. This documentation must be submitted within 48 hours of the occurrence of the emergency.
2. The Department also acknowledges receipt of EPA's comment recommending that all of the individual permits for the facilities discharging to the joint pipeline be revoked and reissued to synchronize the effective and the expiration dates. ADEQ does not concur with this comment at this time.

RESPONSE TO EPA COMMENTS

PERMIT NAME	El Dorado Chemical Company		
PERMIT NUMBER	AR0000752		
	DATE DUE	INITIALS	DATE INITIALED
LORETTA REIBER, P.E. REVIEWING ENGINEER			
MO SHAFII PERMITS SECTION CHIEF			
MARTIN MANER, P.E. CHIEF			

ARE THERE ANY CHANGES IN THE FINAL PERMIT?

YES _____ NO _____

REMARKS: _____
