



**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

January 3, 2024

Charles McDowell, Environmental Leader
El Dorado Chemical Company
4500 North West Avenue
El Dorado, Arkansas 71731

RE: NPDES Permit No. AR0000752, AFIN 70-00040
Stormwater Diversion, Temporary Cooling Tower, and Baffles

Dear Mr. McDowell:

The Office of Water Quality (OWQ) has reviewed your emails dated December 11, 2023, December 12, 2023, and December 14, 2023, concerning the stormwater diversion, temporary cooling tower, and baffle projects.

Stormwater Diversion

Based on your December 11th email, it is the OWQ's understanding that the stormwater diversion will route the stormwater with lower levels of ammonia-nitrogen to Lake Lee in the WWTP in lieu of routing it to Pond 004. This will be done with automatic valves and conductivity testing.

The OWQ has no objections to the project as outlined in the December 11th email. Determination is made in accordance with APC&EC Rule 6.202 that a State Construction Permit is not required for the stormwater diversion project.

Temporary Cooling Tower

Based on your December 12th email and its attachments, it is the OWQ's understanding that the temporary cooling tower is being used to remove ammonia-nitrogen from the wastewater at Lake Lee. Because this facility alteration is a modification, enhancement, or alternative to the previously approved wastewater treatment process, it must be included in a State Construction Permit application for DEQ to further review and consider the requested change.

Baffles in Lake Kildeer

Based on your December 12th and December 14th emails and their attachments, it is the OWQ's understanding that the flow of the wastewater through Lake Kildeer will be altered to a serpentine pattern. Because this facility alteration is a modification, enhancement, or alternative to the previously approved wastewater treatment process, it must be included in a State Construction Permit application for DEQ to further review and consider the requested change.

Please submit an application for a State Construction Permit as soon as possible in order to expedite review of the proposed modifications. If you have any questions, please contact Loretta Carstens, P.E. of the NPDES Permits Section at loretta.carstens@adeq.state.ar.us or at (501) 682-0612.

Sincerely,

Digitally signed by Stacie R. Wassell
DN: cn=Stacie R. Wassell, o=ADEQ, ou=Law and Policy,
email=wassell@adeq.state.ar.us, c=US
Date: 2024.01.03 08:48:28 -06'00'

Stacie R. Wassell
Associate Director, Office of Water Quality