

No
please review and then
give me your recommendations
EL DORADO *ENW*
10-11-04

CHEMICAL COMPANY

October 6, 2004

Mr. Martin Maner, P.E., Chief
Water Division
Arkansas Department of Environmental Quality
P.O. Box 8913
Little Rock, AR 72219-8913

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Re: Permit Modification Request – El Dorado Chemical Company NPDES Permit No. AR000752

Dear Mr. Maner:

By this letter we are requesting modifications to selected monitoring requirements in Section A of the referenced NPDES permit. The following are the requested modifications by outfall.

Outfall 001

We request that the monitoring requirements for copper, selenium and zinc be amended to reflect a sample type of "Grab" instead of a 24-hour composite. Due to the retention time of the 50-acre equalization basin from which the Outfall 001 discharge is generated, grab samples are sufficient to characterize the effluent. In addition, the use of grab samples allows the use of modified clean sampling techniques for the purpose of metals sampling. Those techniques are not feasible with the automated sampling equipment normally utilized for the collection of 24-hour composite samples. Additionally, chronic biomonitoring frequency should be revised to "quarterly" consistent with the 1990 permit.

Outfall 002

We request that the monitoring requirements for metals (copper, lead, selenium, and zinc) and acute toxicity testing be amended to reflect a sample type of "Grab" instead of 24-hour composites. As you are aware, the requirement for 24-hour composite samples for these stormwater outfalls does not parallel the monitoring requirements for other stormwater outfalls under NPDES permits in Arkansas. In addition, as stated above, the utilization of grab samples allows the use of modified clean sampling techniques for the purpose of metals sampling. Those techniques are not feasible with the automated sampling equipment normally utilized for the collection of 24-hour composite samples. Grab samples are adequate to characterize intermittent stormwater discharges such as these as, due to their ephemeral nature, it is not certain that a discharge for a period of 24 hours will occur in relation to a rain event.

Furthermore, we request that the frequency of the acute biomonitoring be revised to "quarterly". Quarterly tests will adequately characterize the outfalls in the interim period before the finalization of the hydrological analyses and are consistent with acute biomonitoring protocols in Arkansas. In addition, it brings the biomonitoring requirements in line with Section 15.4. of Part III of the permit which states that the facility "may apply for a testing frequency reduction upon the successful completion of the first four consecutive quarters of testing for one or both test species....."

Outfall 004

We request that the monitoring requirements for metals (lead and zinc) and acute toxicity testing be amended to reflect a sample type of "Grab" instead of 24-hour composites. As you are aware, the requirement for 24-hour composite samples for these stormwater outfalls does not parallel the monitoring requirements for other stormwater

Mr. Martin Maner, P.E., Chief
Water Division
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Page 2

outfalls under NPDES permits in Arkansas. In addition, as stated above, the utilization of grab samples allows the use of modified clean sampling techniques for the purpose of metals sampling. Those techniques are not feasible with the automated sampling equipment normally utilized for the collection of 24-hour composite samples. Grab samples are adequate to characterize intermittent stormwater discharges such as these as, due to their ephemeral nature, it is not certain that a discharge for a period of 24 hours will occur in relation to a rain event.

Furthermore, we request that the frequency of the acute biomonitoring be revised to "quarterly". Quarterly tests will adequately characterize the outfalls in the interim period before the finalization of the hydrological analyses and are consistent with acute biomonitoring protocols in Arkansas. In addition, it brings the biomonitoring requirements in line with Section 15.4. of Part III of the permit which states that the facility "may apply for a testing frequency reduction upon the successful completion of the first four consecutive quarters of testing for one or both test species. . . ."

Additionally, we request that the monitoring frequency for all parameters for this stormwater outfall, except biomonitoring, be revised to "monthly".

Outfalls 005, 006 and 007

We request that the monitoring requirements for metals (cadmium, lead and zinc) and acute toxicity testing be amended to reflect a sample type of "Grab" instead of 24-hour composites. As you are aware, the requirement for 24-hour composite samples for these stormwater outfalls does not parallel the monitoring requirements for other stormwater outfalls under NPDES permits in Arkansas. In addition, as stated above, the utilization of grab samples allows the use of modified clean sampling techniques for the purpose of metals sampling. Those techniques are not feasible with the automated sampling equipment normally utilized for the collection of 24-hour composite samples. Grab samples are adequate to characterize intermittent stormwater discharges such as these as, due to their ephemeral nature, it is not certain that a discharge for a period of 24 hours will occur in relation to a rain event.

Furthermore, we request that the frequency of the acute biomonitoring be revised to "quarterly". Quarterly tests will adequately characterize the outfalls in the interim period before the finalization of the hydrological analyses and are consistent with acute biomonitoring protocols in Arkansas. In addition, it brings the biomonitoring requirements in line with Section 15.4. of Part III of the permit which states that the facility "may apply for a testing frequency reduction upon the successful completion of the first four consecutive quarters of testing for one or both test species....."

Additionally, we request that the monitoring frequency for all parameters for these stormwater outfalls, except biomonitoring, be revised to "monthly" consistent with the Outfall 004 sampling protocol.

Outfall 010

Outfall 010 addresses the effluent from EDCC which will be discharged into a pipeline. The current plan is for the pipeline to be used by four entities, the City of El Dorado, Lion Oil Company, Great Lakes Chemical Corporation and EDCC. Concurrently with this request, these four entities are filing a joint application for a Joint NPDES Permit which will address the combined effluent discharge from the pipeline into the Ouachita River. It is our understanding that the Joint NPDES permit will contain certain water quality based effluent limitations, and the corresponding effluent limitations in EDCC's individual NPDES Permit may need to be re-evaluated and modified to coordinate the Joint NPDES Permit with the NPDES Permits issued to each of the four entities.. It is also our understanding that ADEQ desires to coordinate the monitoring requirements for certain common constituents between the individual NPDES Permits issued to each of the four entities, and the Joint NPDES Permit. This letter

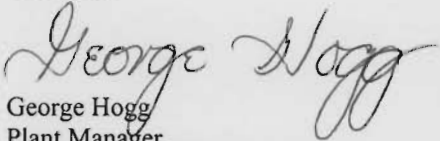
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Water Division
Arkansas Department of Environmental Quality
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serves as our request to modify the effluent limitations and/or monitoring requirements for Outfall 010 as necessary to coordinate the Joint NPDES Permit and EDCC's individual NPDES Permit.

This modification request is limited to only those effluent limitations and/or monitoring requirements required to coordinate the Joint NPDES Permit and EDCC's individual NPDES Permit. Through this modification request, EDCC reserves its right to comment upon and object to any more restrictive effluent limitation and/or monitoring requirement that may be imposed upon the EDCC NPDES Permit.

Hopefully this letter has clearly expressed our modification request. If not, do not hesitate to contact Randall Whitmore of my staff. We greatly appreciate your prompt attention to this matter.

Sincerely,



George Hogg
Plant Manager
El Dorado Chemical Company

cc: Mo Shafii, ADEQ
John Carver, LSB Industries
Chuck Nestrud, Chisenhall, Nestrud & Julian
Randall Whitmore, EDCC
Vince Blubaugh, GBMc & Associates

From: Origin ID: (870)863-1498
Randall Whilmore
El Dorado Chemical Company
4500 NW Avenue



El Dorado, AR 71730

Ship Date: 06OCT04
Actual Wgt: 1 LB
System#: 5887030/INET1900
Account#: S *****

REF:

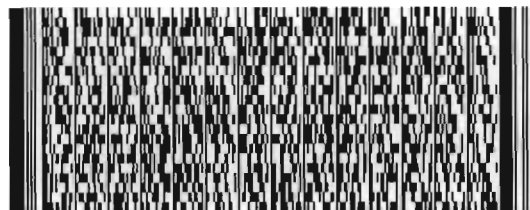


Delivery Address Bar Code

SHIP TO: (870)863-1428 **BILL SENDER**

Martin Maner, P.E., Chief
Water Division - ADEQ
8001 National Drive

Little Rock, AR 72207



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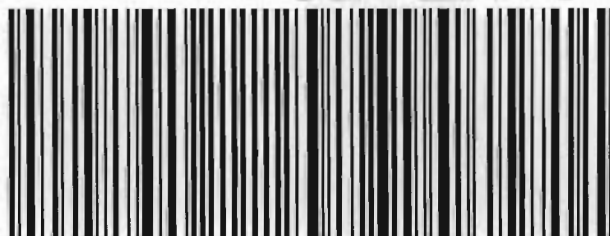
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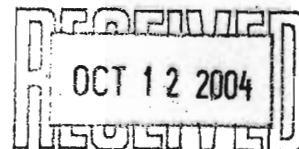
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CHEMICAL COMPANY

October 11, 2004

Mr. Henry Insua, PE
Arkansas Department of Environmental Quality
State Permits Branch
Water Division
8001 National Drive
P. O. Box 8913
Little Rock, AR 72219-8913



RE: El Dorado Chemical Company – NPDES No. AR0000752
Request for Authorization of Temporary Staging Area for Wastewater Solids
GBM^o No. 2042-99-010

Dear Mr. Insua:

El Dorado Chemical Company (EDCC) respectfully requests authorization of an on-site area to be used for the temporary staging and dewatering of solids removed from a wastewater treatment basin during maintenance activities. Specifically, EDCC proposes to remove accumulated solids from the day pond (Lake Lee) by dredging and stage them for dewatering purposes on a ten-acre area (approximate) adjacent to the final treatment/polishing basin (Lake Killdeer). Measurements in the day pond indicate that 16,000 cubic yards of inorganic solid materials and biological treatment residuals are present in the basin. The basin has reached its solids storage capacity and removal of solids is essential to maintain the safe and efficient operation of the treatment unit.

GBM^o & Associates (GBM^o) characterized the basin solids and their study results are attached. After the solids have dewatered, EDCC will manage or dispose of the materials in a manner approved by ADEQ. The intent is to develop the solids for use as an on-site soil amendment to revegetate eroded areas at the facility. A permit application and management plan detailing the proposal for beneficial use of the solids will be submitted to ADEQ under separate cover. Nevertheless, the removal of solids from the day pond to provide solids separation is a part of the overall effort to improve wastewater quality at EDCC and we ask that this matter be considered independent of the land application/beneficial use request.

We have also attached an aerial photograph and topographic map showing the desired staging location. Note that the area generally slopes toward the final treatment/polishing basin, and we propose to modify the staging area by the construction of a series of temporary earthen berms perpendicular to the natural slope to maximize the settling time for wet solids from the dredge equipment. Water separated from the solids will flow into the final basin for additional treatment prior to discharge through NPDES permitted Outfall 001. Diversion berms and/or trenches will be constructed to minimize storm water run-on to the staging area. Storm water from direct contact with the dewatered solids will flow to the final basin for treatment and discharge.

Mr. Henry Insua, PE
ADEQ State Permits Branch
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In conclusion, removal of solids from the day pond is a maintenance activity essential to the continued function of the EDCC wastewater treatment system. We are prepared to initiate the solids removal project immediately upon your authorization of the staging/dewatering area. To allow our contractor to complete the solids dredging project during optimum weather, we ask for your timely consideration of this request.

Thank you for your consideration and assistance in this matter. If you have any question, please contact me at (870) 863-1498, or Chuck Campbell (GBM^c) at (501) 847-7077.

Sincerely,
El Dorado Chemical Company



Randall Whitmore
Responsible Care[®] Manager

Attachments

cc: John Carver-LSB
Kyle Wimsett-EDCC
Chuck Campbell-GBM^c