



ARKANSAS
Department of Environmental Quality

Certified Mail No.: 7009 0960 0000 7899 0831

January 12, 2010

David Sartain
El Dorado Chemical Company
P.O. Box 231
El Dorado, AR 71731-0231

RE: Request to begin Toxicity Reduction Evaluation (TRE).
NPDES Permit No. AR0000752
AFIN: 70-00040
Outfall 001

Dear Mr. Sartain:

During a review of the whole effluent toxicity (WET) testing data for the past five years, it was noted that there have been numerous failures reported for sub-lethality for *P. promelas* (growth) and *C. dubia* (reproduction). It is necessary at this time for EDCC to take the appropriate actions to address *P. promelas* and *C. dubia* toxicity at outfall 001. Therefore, the Department requires that EDCC begin a Toxicity Reduction Evaluation (TRE) for *P. promelas* and *C. dubia* sub-lethality.

Reg 2.508 states "Toxic substances shall not be present in receiving waters, after mixing, in such quantities as to be toxic to human, animal, plant or aquatic life or to interfere with the normal propagation, growth and survival of the indigenous aquatic biota."

Below is a summary of the reported WET test failures for NPDES Permit No. AR0000752

Number of tests performed during previous 5 years by species:

***Pimephales promelas* (Fathead minnow): 42**

***Ceriodaphnia dubia* (water flea):42**

Failed test dates during previous 5 years by species:

<i>Pimephales promelas</i> (Fathead minnow):	<u>Lethal</u>	<u>Sub-lethal</u>
	01-05	01-05
	02-05	02-05
	03-05	03-05
	03-09	04-05
		05-05
		06-05
		03-06
		09-06

01-07
10-07
11-07
10-08
03-09

***Ceriodaphnia dubia* (water flea):**

Lethal
12-08
02-09

Sub-lethal
01-05
03-05
05-05
09-05
04-06
12-08
02-09
04-09
06-09
07-09
09-09
10-09

Enclosed are the Departments standard requirements for permittee's conducting a TRE, including guidelines, schedules, and reporting requirements.

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

Sincerely,



Mary Barnett
Ecologist
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