

ADEQ

ARKANSAS
Department of Environmental Quality

February 7, 2008

Greg Withrow, General Manager
El Dorado Chemical Company
P.O. Box 231
El Dorado, AR 71731

NPDES PERMIT FILE
NPDES # <u>AR0000752</u>
AFIN # <u>70-00040</u>
Permit PN
<input checked="" type="checkbox"/> Correspondence
<input type="checkbox"/> Technical Backup
<u>2/12/08</u> <u>HL</u> Date Scanned

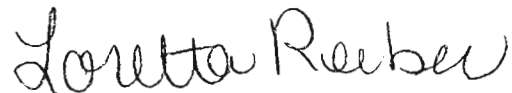
RE: NPDES Permit No. AR0000752, AFIN 70-00040

Dear Mr. Withrow:

1. The NH₃-N permit limits are being lowered due to the toxicity criteria in Section 2.512 of Arkansas Pollution Control and Ecology Commission Regulation No. 2 and the Total Maximum Daily Load (TMDL) which has been set by EPA for the receiving stream. How will the facility meet the lower NH₃-N limits at each of the outfalls? The Department recognizes that the NH₃-N levels in the effluent discharged through Outfall 001 have fallen a significant amount over the past few years. However, the levels reported are still above what the new permit limits will be.
2. How will the facility meet the lower chlorides limit at Outfall 001? All reported values are above what the permit limit will be (16 mg/l).
3. The Department has agreed to the use of background flow to effluent flow ratios for Outfalls 006 and 007 based upon a study performed for the facility by GBMc & Associates. Part of the background flow for Outfall 006 will consist of the effluent from Outfall 007. Therefore, the Department will be considering the permit limits for Outfall 007 as part of the background concentration when determining the limits for Outfall 006. The Department does not want to set a limit at one of the outfalls that is at a level which would cause a limit that is too restrictive at the other outfall. Therefore, the Department will set the limits at Outfall 007 as close as possible to the limits for Outfall 006 while ensuring that all limits meet the required water quality standards.
4. How will the facility meet the new permit limits for Outfalls 006 and 007? The Department recognizes that there will likely be a schedule of compliance for NH₃-N for these two outfalls. However, there is currently no treatment in place at these outfalls and any change in operation at these outfalls may affect the background to effluent flow ratios used to calculate the permit limits.

If you have any questions or would like to schedule a meeting to discuss the issues in this letter, please feel free to contact me at reiber@adeq.state.ar.us or call me at (501) 682-0612.

Sincerely,



Loretta Reiber, P.E.
Engineer, NPDES Permits

cc: Vince Blubaugh, GBMc & Associates