



CHEMICAL COMPANY

December 16, 2010

Ms. Loretta Reiber P.E.
Arkansas Department of Environmental Quality
Permits Branch – Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: El Dorado Chemical Company NPDES Storm Water Coverage
NPDES Permit No. AR0000752, AFIN 70-00040

Dear Ms. Reiber:

El Dorado Chemical Company (EDCC) is in receipt of your letter dated October 18, 2010. In this letter you stated that EDCC's current permit contains language requiring the development of a Storm Water Pollution Prevention Plan (SWPPP) for storm water associated with industrial activity which is not discharged through one of the outfalls in the NPDES Permit. Upon renewal, ADEQ is now requiring EDCC to obtain a separate permit to cover the storm water associated with industrial activity not discharging through already permitted outfalls. You asked that a Notice of Intent and SWPPP be submitted to gain this separate coverage no later than January 31, 2011.

We understand that a storm water permit will be required in addition to our current permit. We are assuming that the January 31, 2011 deadline for submittal was put into place to accelerate the permitting process. Our understanding is that EDCC has storm water coverage in place under the current individual permit until it is renewed.

EDCC is currently in the process of reviewing all storm water run-off at the facility and possible options for combining or eliminating existing outfalls. Justification for similar outfalls is also being evaluated. The SWPPP will also require updating to include the new requirements of the Arkansas Storm Water General Permit. This is going to take more time than originally expected. For the reasons mentioned in the previous paragraphs, EDCC requests that the deadline on the application process be extended to March 31, 2011 or until the effective date of the permit, whichever is later.

We appreciate your consideration of this matter. If you have any questions or require additional information please do not hesitate to contact me or Russell McLaren with GBM^c & Associates at 501-847-7077.

Respectfully submitted,
El Dorado Chemical Company

A handwritten signature in cursive script, appearing to read "David Sartain", is written over the typed name.

David Sartain
EDCC Environmental Specialist

cc: Russell McLaren - GBM^c & Associates

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David Sartain
El Dorado Chemical Co.
4500 Northwest Ave.

El Dorado, AR 71730



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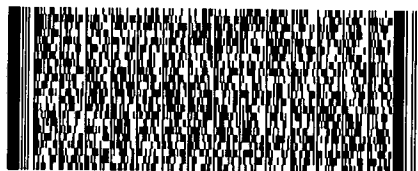
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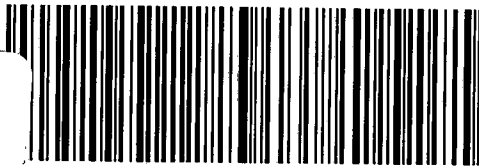
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