



CHEMICAL COMPANY

July 13, 2011

Mr. Gene Little
Enforcement Administrator
Water Division Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72118-5317

Re: El Dorado Chemical Company (EDCC) NPDES Permit AR0000752, CAO LIS 08-067, Quarterly Report

Dear Mr. Little:

Item 2 of the Order and Agreement section of the referenced CAO requires that EDCC submit quarterly status reports on the elimination or re-routing of outfalls 006 and 007. Item 2 also states that this report is to continue until the permit is renewed or December 31, 2009, whichever comes first. Since the December 31, 2009 deadline, EDCC has continued to submit these reports in an effort to keep the Department informed on EDCC's efforts associated with outfalls 006 and 007.

The previous quarterly report submitted to Mr. Mo Shafii on April 7, 2011 stated that EDCC had determined that the relocation of these outfalls was not a cost effective option and would not be altered at this time. The previous quarterly report also states that the primary reason for not altering the referenced outfalls at this time is that EDCC anticipated that the background flow ratios for these outfalls presented in the September 21, 2006 report to ADEQ would be utilized in the renewal of our NPDES permit as based on communication with the NPDES permitting staff. The use of those ratios will significantly change the effluent limits for outfalls 006 and 007 at such time as the permit is renewed.

Based on data submitted to ADEQ in previous quarterly reports as well as the December 31, 2009 deadline discussed in item 2 of the referenced CAO, EDCC would like confirmation from ADEQ that the quarterly reporting requirement associated with the elimination or re-routing of outfalls 006 and 007 can be discontinued.

Should you have any questions concerning this request please feel free to contact Brent Parker at 870-863-1403 or by e-mail at bparker@edc-ark.com.

Sincerely,

A handwritten signature in cursive script that reads "Greg Withrow".

Greg Withrow
General Manager
El Dorado Chemical Company