ADEQ

ARKANSAS
Department of Environmental Quality

January 5, 2007

Wes Morgan
El Dorado Chemical Company
P.O. Box 231
El Dorado, AR 71731-0231

Re: NPDES Permit Number AR0000752 – AFIN 70-00040

Dear Mr. Morgan:

The Department has received and reviewed the "Storm Water Flow Study Report" dated September 21, 2006 (the Report). The following questions have been developed based on this review. Please respond to each question within thirty days of receipt of this letter so that our review can proceed.

1. From Figure 1 on Page 2 of the Report, it appears that the background flow meters were placed downstream of Outfalls 006 and 007. If this is correct, please explain why this is appropriate. Also, please explain why monitors were not also placed at the property boundary upstream of the facility to determine the flow rate of the stream entering the property.

2. Section 5.1 of the Report:

   a. It is not clear whether the background flow to effluent flow ratios were assumed to be normally distributed in the confidence interval calculations. Please provide the assumptions made and a detailed copy of the calculations for the lower 95% confidence interval proposed (i.e., reference citations and equations used).

   b. Please explain why days without rainfall were not included in the calculations.

   c. Please explain why the lower 95% confidence interval will be protective of human health and the environment versus a more restrictive interval (e.g., lower 99.99% confidence interval). Is there any regulatory basis or precedent to the proposed confidence interval?

3. It is important to note that the final background flow to effluent flow ratio for each outfall will be included in the permit upon renewal. Please explain how compliance with these proposed limits will be met and monitored.

If you have any questions, please contact me at (501) 682-0616 or via e-mail at shafii@adeq.state.ar.us.

Sincerely,

Mo Shafii
Permits Section Chief
NPDES Section, Water Division

cc: Chuck Campbell, PE, REM, GBM^C & Associates