

ADEQ

ARKANSAS
Department of Environmental Quality

April 23, 2007

Vince Blubaugh
Principal
GBMc & Associates
219 Brown Lane
Bryant, Arkansas 72022

RE: El Dorado Chemical Company Stormwater Flow Study
NPDES Permit No. AR0000752, AFIN 70-00040

Dear Mr. Blubaugh:

The Department has received and reviewed your correspondence dated April 17, 2007, concerning the three proposals for the stormwater outfalls at El Dorado Chemical Company (EDCC). The Department will include a form of option #3 (outlined in the Department's letter dated March 28, 2007) in EDCC's permit upon renewal. The Department will be in contact with EDCC in order to work out specific details.

If you have any questions or concerns, please feel free to contact me at (501) 682-0616.

Sincerely,



Mo Shafii
Permits Branch Manager
Water Division

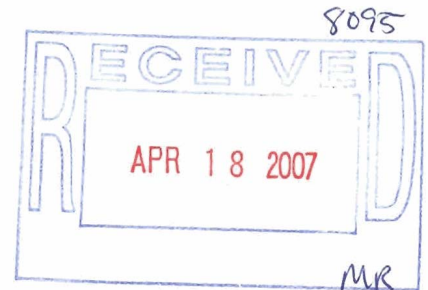
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cc: Greg Withrow, El Dorado Chemical Company



April 17, 2007

Mr. Mo Shafii
NPDES Branch Manager
Water Division
Arkansas Department of Environmental Quality
8001 National Drive
PO Box 8913
Little Rock, AR 72219-8913



RE: El Dorado Chemical Company Storm water Flow Study Report – Review Letter
GBM^c No. 2042-99-010

Dear Mr. Shafii:

We have reviewed your March 28, 2007 letter regarding the implementation of the results of the referenced flow study report. We greatly appreciate your attention to this matter. Based on our review, we offer the following comments concerning the three options presented in your letter.

Option #1. This is not a feasible option for El Dorado Chemical because they currently have no control over the flow from the outfalls. They have no means to store and then release storm water enable to maintain a specific percentage of effluent in relation to receiving stream flows.

Option #2. This is not a feasible option. The Storm water Flow Study Report documented that the current permit requirements are based on the erroneous assumption that the receiving stream has no flow upstream of the outfalls during discharge events. Consequently, the current water quality based effluent limits for the outfalls are not based on current conditions and need to be modified accordingly.

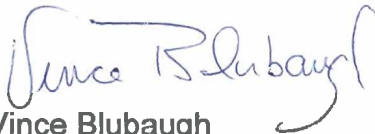
~~Option #3.~~ ~~With some modifications, this option has the potential to develop permit limitations and biomonitoring critical dilutions which are reflective of the characteristics of the discharge. However, we do not feel there is a need for monthly reporting (through DMRs) of the information listed as items 3a through 3d. As you are aware, the effluent/receiving stream data was collected in real-time. Consequently the ratios recommended for use in determining the need for or to set effluent limits represent existing conditions. The ratios were not predetermined as necessary to maintain water quality criteria. As such there is no need to verify those on a monthly basis to determine if the same flow characteristics are being maintained as the study data shows that there will be variations. Those variations are already built into the recommended ratios.~~

Mr. Mo Shafii
April 17, 2007
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However, we would entertain the concept of providing an annual report to ADEQ containing the information listed in items a through d under Option 3. In this manner the ADEQ can have a method of assessing whether the conditions which existed during the time of the Storm water Flow Study are still applicable and whether changes are appropriate during the next renewal of the NPDES permit.

Hopefully, this letter has addressed your concerns. We greatly appreciate your attention to this matter and look forward to the successful resolution of this matter.

Sincerely,
GBMc & Associates



Vince Blubaugh
Principal

cc. Greg Withrow, EDCC
John Carver, LSB
Chuck Campbell, GBMc & Associates