



ARKANSAS

ENERGY & ENVIRONMENT

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (9489 0090 0027 6226 5185 78)

Delmar Reppond
El Dorado Chemical Company
P.O. Box 231
El Dorado, AR 71731-0231

10/14/2020

Re: NPDES Permit Number AR0000752, AFIN 70-00040

Dear Mr. Reppond:

The Office of Water Quality (OWQ) has reviewed the Stormwater Flow Study (Study) submitted by GBMc & Associates on March 23, 2020. Submittal of the document fulfills the requirement in LIS 18-060, Order & Agreement #7.

The Study requested implementation of the average background flow to effluent flow ratio of the unnamed tributary for Outfalls 006 and 007. As explained in previous communications, the average background flow to effluent flow ratio is a higher ratio than the majority of discharge events. Use of average flows will result in periods when the water quality criteria is exceeded. In addition, OWQ does not calculate reasonable potential or permit limits based on average background flows for metals and conventional pollutants.

OWQ requests that the Study provide a proposed flow ratio that could be used as an alternative to the critical flow. For this facility, critical flow should be the statistical low flow obtained from the data gathered during the flow study.

Please revise the Study to reflect the low flow to be used in determining permit limits for Outfalls 006 and 007 no later than October 15, 2020. Thank you for your cooperation in this matter. If there are any questions concerning this submittal, please contact me by email at loretta.carstens@adeq.state.ar.us or at (501) 682-0612.

Sincerely,

A handwritten signature in blue ink that reads "Loretta Carstens".

Loretta Carstens, P.E.
Engineer, NPDES Permits
Office of Water Quality

cc: Mary Barnett, Ecologist Coordinator
Richard Healey, Enforcement Branch Manager
David Ramsey, ICIS Program Coordinator
Amanda Gallagher, P.E., GBMc & Associates