CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7004 1160 0003 0355 9697)

Mr. Martin Maner, P.E.
Chief, Water Division
Arkansas Department of Environmental Quality
P. O. Box 8913
Little Rock, AR 72219-8913

Re: No Objection to Preliminary Draft Permit
Great Lakes Chemical Corporation
NPDES Permit Number AR0001171

Dear Mr. Maner:

We have reviewed the draft permit transmitted via e-mail from Morteza (Mo) Shafii, ADEQ to Evelyn Rosborough, EPA on December 15, 2005. The permit appears to conform to the guidelines and requirements established by the Clean Water Act and the NPDES regulations, and the draft needs to be publically noticed.

RECOMMENDATION:

We also would like to offer the following recommendations:

1. Please include language in the permit which limits and identifies the conditions under which the permittee is authorized to switch discharging from the pipeline and the old discharge point.

2. It is unclear how the permits which discharge to the pipeline, having various effective dates, will be managed for compliance. Revoking and reissuing the permits for El Dorado Chemical, El Dorado Utilities, Great Lakes Chemical and Lion Oil will synchronize the effective and expiration dates with all the permits associated with the El Dorado Pipeline.
We will be happy to work with you and your staff to clarify or resolve the concern which initiated our objection. If we may help your office achieve its permitting goals, please call me at 214-665-7170 or have your staff contact Monica Burrell at VOICE: 214-665-7530, FAX: 214-665-2191, or EMAIL: burrell.monica@epa.gov.

Sincerely yours,

Miguel I. Flores
Director
Water Quality Protection Division

cc: Morteza (Mo) Shafii, ADEQ