



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

September 20, 2016

Sarah Clem
ADEQ Branch Manager
Arkansas Department of Environmental Quality
5301 Northshore Drive
Little Rock, AR 72118-5317

Re: Environmental Protection Agency comments on the Proposed 3rd party rule by Halliburton Energy Services, Inc. for the Dresser Industries-Magcobar Mine Site

Dear Ms. Clem:

The Environmental Protection Agency Region 6 (EPA) has completed its review of the *Halliburton Energy Services, Inc. Dresser Industries-Magcobar Former Mine Site Notice of Intent of An Environmental Improvement Project* and its related appendices. This notice of intent presents evidence supporting temporary modifications to water quality standards for Chamberlain Creek, Cove Creek, Lucinda Creek, Reyburn Creek, Rusher Creek, and Scull Creek including Clearwater Lake. The EPA would like to offer the following general and enclosed detailed comments for the Arkansas Department of Environmental Quality's consideration.

EPA would like to see some additional data related to this environmental improvement project (EIP) and has a number of questions related to the information submitted. In particular, EPA would like to see the results of the chronic toxicity tests performed with the discharge from the water treatment system along with the associated discharge monitoring report (DMR) data for metals, minerals, and pH. EPA would also like to see further justification of some of the concentrations proposed for modified criteria. In some instances the criteria proposed are greater than the maximum instream concentration observed over the 12 years of monitoring. In addition, EPA is interested in seeing a commitment to regular reviews of the effectiveness of the remediation activity to determine if any adjustments to the remediation plan are needed. EPA would also like to see a commitment to reassessing options available for minerals treatment at scheduled times during the remediation process.

Because the temporary modifications proposed by Halliburton Energy Services, Inc. have not yet been adopted as a revision to the Arkansas water quality standards (WQS) and formally submitted to EPA for approval, these conclusions are preliminary and do not represent a WQS approval under CWA §303(c).

EPA appreciates the opportunity to provide comments on this study. If you have any questions, please contact me at (214) 665-3185.

Sincerely,



Karen Kesler
Water Quality Standards Coordinator
Watershed Management Section

Enclosure