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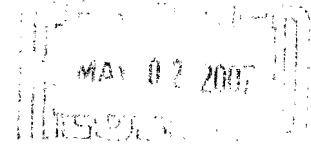
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EL DORADO

CHEMICAL COMPANY

April 24, 2007

Mr. Dennis Benson  
Enforcement Section – Water Division  
Arkansas Department of Environmental Quality  
P.O. Box 8913  
Little Rock, AR 72219-8913



Re: El Dorado Chemical Company (EDCC) Groundwater Risk Assessment  
AFIN 70-00040; CAO LIS No. 06-153; NPDES Permit No. AR0000752

Dear Mr. Benson:

As required by Paragraph 10 of the Order and Agreement Section of CAO LIS No. 06-153, EDCC must notify ADEQ of any event which causes delay in the achievement of compliance with the requirements or deadlines of the CAO. At this time, EDCC is providing notification of a delay in submitting the risk assessment report to ADEQ within 6 months of the effective date of the CAO, as required by Paragraph 6 of the Order and Agreement Section of CAO. The following information summarizes the delay:

- **Length of delay:** 90 days
- **Cause of delay:** Personnel, contractor/consultant communications
- **Measures being taken to minimize delay:** Released personnel, re-staffing of EDCC environmental department, changed consultants
- **Timetable for implementation:** 90 day extension to complete and submit risk assessment, however the remedial action plan (RAP) to be submitted on time as stipulated in Paragraph 6 of the Order and Agreement Section of CAO (November 16, 2007)

As noted above, EDCC is requesting a 90 day extension for the submittal of the risk assessment. Paragraph 6 of the Order and Agreement Section of CAO has two components: (1) complete and submit a risk assessment report, and (2) development of a RAP to address such risks identified in the risk assessment. Although EDCC is requesting an extension for submittal of the risk assessment, EDCC intends to develop the RAP within the scheduled compliance date, which is one (1) year from the effective date of the CAO (November 16, 2007).

At the request of ADEQ, EDCC would be willing to meet to discuss the delay and extension. If you have any questions, do not hesitate to contact me or Bob McKinney at (870) 863-1400.

Sincerely,

  
Greg Withrow

CC: Martin Maner, ADEQ  
Laura Leslie-Stuart, ADEQ  
John Carver, LSB Industries  
Chuck Nestrud, Chisenhall, Nestrud & Julian  
Mark Ruppel, GBMc & Associates