



ARKANSAS
Department of Environmental Quality

August 9, 2011

John M. Carver
Vice President Safety & Environmental Compliance
El Dorado Chemical Company
P.O. Box 1373
Oklahoma City, Oklahoma 73101

RE: Modification to Groundwater Monitoring Program
CAO LIS 06-153; AFIN: 70-00040

Dear Mr. Carver:

This letter is in response to the El Dorado Chemical Company (EDCC) letter dated June 3, 2011 in which you requested a modification of the groundwater sampling program in accordance with Consent Administrative Order (CAO) LIS 06-153, Order and Agreement Condition 3 consisting of the elimination of the analysis for the following parameters in all 22 groundwater monitoring wells:

1. In-situ remediation parameters: alkalinity, nitrite, phosphorus, total organic carbon, redox, dissolved iron, dissolved manganese
2. Chromium
3. Lead

Based on a review of the 2010 Annual Ground Water Report received March 31, 2011 which included historical ground water analytical data for the site, the concentrations of the above referenced parameters have been below the detection limit or very low in all of the 22 groundwater monitoring wells with the exception of lead, chromium, and total phosphorus. Background levels for dissolved iron and dissolved manganese in upgradient (background) wells and analytical results for alkalinity, total organic carbon, and redox indicate that the levels in the onsite wells do not seem to be anomalous and therefore do not require ongoing monitoring. Although the lead and total phosphorus levels detected during 2010 appear to be on a generally decreasing trend, these constituents are above detection levels and above background levels in some wells, and must continue to be monitored to verify the adequacy of the remediation system at the site. Chromium and lead levels above detection limits were found in well ECMW-18 in 2008. A chromium level of 0.011 was found in well ECMW-6 in November 2010 and a lead level of 0.017 was found in well ECMW-4 in May 2008. Both of these levels were higher than any previous levels detected in these wells.

Your request to eliminate the analysis for the alkalinity, nitrite, phosphorus, total organic carbon, redox, dissolved iron, and dissolved manganese from all 22 groundwater monitoring wells is approved. EDCC must continue to analyze for total and dissolved lead, total and dissolved chromium, pH, ammonia-N, Nitrate-N, sulfate, temperature, and specific conductance in

accordance with the conditions and requirements of Consent Administrative Order (CAO) LIS 06-153.

Please note that in the event additional information becomes available, the Department reserves the right to change the monitoring requirements.

Thank you for your cooperation in this matter. If you have any questions, please contact Ms. Linda Hanson, P.G. at (501) 682-0646 or by e-mail at hanson@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mo Shafii', written in a cursive style.

Mo Shafii
Assistant Chief
Water Division

MS:lh

cc: Sam Sawyer, Enforcement Coordinator, Enforcement Branch
File (CAO LIS 06-153; AFIN: 70-00040)