

ADEQ

ARKANSAS
Department of Environmental Quality

APR 20 2015

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

RE: AFIN: 70-00040; CAO LIS 06-153
2014 Annual Groundwater Report for El Dorado Chemical Company

Dear Mr. Carver:

This letter is in response to the El Dorado Chemical Company (EDCC) 2014 Annual Ground Water Report received March 31, 2014 (Report) with additional information submitted April 1, 2015, in accordance with Consent Administrative Order (CAO) LIS 06-153 Condition 4 and in accordance with letters regarding sampling requirements dated October 2005, June, 2007, September, 2009 and July, 2011.

The Department has reviewed the Report and determined that the mid-gradient and down-gradient wells do not show statistically increasing contaminant trends and are generally statistically similar to background wells or within the same order of magnitude. All trends over time observed in these wells are decreasing. The highest concentrations at the wells nearest the recovery wells have shown significantly increasing trends over time, (approximately one order of magnitude greater than the down gradient well values within the production area). This indicates that the recovery wells are controlling the production area ground water and keeping these contaminants from migrating out of the production area. However, some of the down-gradient wells have shown ammonia levels of greater than 0.55 mg/L (as listed in the Remedial Action Work Plan) during recent sampling, so shutting off the recovery wells could likely result in the down-gradient movement of contaminants. EDCC should continue operating the recovery wells and should continue the current sampling and analysis schedule in accordance with the conditions and requirements of the sampling protocol outlined in Consent Administrative Order (CAO) LIS 06-153 and the subsequent sampling requirement letters listed above.

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,



Mo Shafii Assistant Chief Water
Division

MS:lh

cc: Greg Withrow, General Manager, EDCC, gwithrow@edc-ark.com
Lauren Marcella, Project Geologist, EMS, Inc., lmarella@env-mgt.com
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File (CAO LIS 06-153; AFIN: 70-00040)