

ADEQ

ARKANSAS
Department of Environmental Quality

FEB 18 2015

Greg Withrow, General Manager
El Dorado Chemical Company
P.O. Box 1414
El Dorado, Arkansas 71731

RE: AFIN: 70-00040; CAO LIS 06-153; Permit No. AR0000752
El Dorado Chemical Company, El Dorado, Union County
Nov. 4, 2014 Request for Groundwater Monitoring Frequency Change

Dear Mr. Withrow:

This letter is in response to the El Dorado Chemical Company (EDCC) November 4, 2014 Groundwater Monitoring Statistical Report (Report).

The Department has reviewed the Report and determined the following:

EDCC appears to be meeting the requirements of CAO LIS 06-153. The statistical data reported for the groundwater analysis indicate that the elevated constituent concentrations are contained in the production area. Mid-gradient and down-gradient wells do not show statistically increasing 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 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. In addition, the dissolved chromium and lead in wells 6, 18, and 21 should be further addressed.

You have requested that the monitoring frequency for up-gradient wells (1, 2, and 3), production area wells (4, 9, 12, and 13), mid-gradient wells (14, 15, and 16) and down-gradient wells (17 to 22) be reduced from the current semi-annual schedule to a biennial schedule. You stated you would continue semi-annual sampling of production area wells (5, 6, 7, 8, 10, and 11) and recovery wells (1 and 2).

Order and Agreement Condition No. 3 of CAO LIS 06-153 requires semi-annual groundwater monitoring and says that individual wells or parameters may be removed from the monitoring network. The CAO does not have provisions for changing the frequency of monitoring.

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@adcq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ellen Carpenter', with a date '2-12-15' written at the end of the signature.

Ellen Carpenter
Chief, Water Division

MS:lh

cc: John M. Carver, V.P., Safety & Environmental Compliance, (jcarver@lsbindustries.com)
Mo Shafii, Assistant Chief, Water Division, (shafii@adeq.state.ar.us)
John Bailey, P. E., Permits Branch Manager, (bailey@adeq.state.ar.us)
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Chuck Campbell, P. E., R. E. M., GBM^c & Associates, (ccampbell@gbmcassoc.com)
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