

# ADEQ

ARKANSAS  
Department of Environmental Quality

JUN 24 2014

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

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JUL 07 2014

RE: AFIN: 70-00040; CAO LIS 06-153; permit no. AR0000752  
2013 Annual Groundwater Report for El Dorado Chemical Company

Dear Mr. Withrow:

This letter is in response to the El Dorado Chemical Company (EDCC) 2013 Annual Ground Water Report received March 31, 2014 (Report) with additional information submitted April 11 and 17, and May 22, 2014, 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 it meets the requirements as outlined in the CAO and the sampling requirements letters. Wells 5, 6, 7, 11, and 17 (in the Production Area north of the acid and nitrate process locations) show increasing trends in ammonia, nitrate, and sulfate concentrations.

Please note that the Department hereby requests that you also complete the following actions and include the results in your 2014 Annual Ground Water Report:

- Continue to operate the ground water recovery system and continue ground water sampling and analysis during 2014 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.
- In addition to the scheduled well sampling, sample the ground water from the background wells ECMW-1, ECMW-2, and ECMW-3 for all the scheduled sampling parameters.
- Perform statistical analyses (including all analytical data) for all required parameters to determine whether or not the contaminants of concern in the site ground water are stabilizing or may necessitate additional corrective action.

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](mailto:hanson@adeq.state.ar.us).

Sincerely,



Mo Shafii  
Assistant Chief, Water Division

MS:lh

cc: Lauren Marcella, Project Geologist, EMS, Inc., ([lmcella@env-mgt.com](mailto:lmcella@env-mgt.com))  
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File (AFIN: 70-00040; CAO LIS 06-153; permit no. AR0000752)

Response to  
2013 Annual  
GW Report

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Department of Environmental Quality

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