

Arkansas Department of Health

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Governor Asa Hutchinson
Nathaniel Smith, MD, MPH, Director and State Health Officer

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September 8, 2016

Kelly Robinson
Arkansas Department of Environmental Quality
Public Outreach and Assistance Division
5301 Northshore Drive
North Little Rock, AR 72118

RE:

APC&EC Regulation #2 Proposed Third-Party Rulemaking
Halliburton Energy Services Inc. Dresser Industries-Magcobar mine site
Magnet Cove, Hot Spring County
AFIN #30-00348, 30-00331

Docket #16-003-R

Dear Ms. Robinson:

The Arkansas Department of Health (ADH) has reviewed the proposed Third-Party Rulemaking referenced above and offers the following comments:

- In the long term, reclamation of the former mine site is supportive of maintaining water quality
 in the Ouachita River which is utilized as a drinking water source for four public water systems.
 The four public water systems are: the Kimzey Regional Water District, the Malvern
 Waterworks, the Arkadelphia Waterworks, and the Camden Waterworks. Together these four
 public water systems provide drinking water to approximately 65,000 Arkansans. Once
 reclaimed, re-vegetation of the site and other improvements should improve water quality
 entering the Ouachita River.
- Cove Creek discharges into the Ouachita River in close proximity to the Kimzey Regional Water
 District intake structure. While the potential for back mixing appears to be minimal, the ADH
 nevertheless asks that secondary drinking water standards criteria concerning minerals be
 applied to Cove Creek and this is consistent with the proposed rulemaking.
- 3. Chloride concentrations of are particular concern with regards to drinking water systems efforts to control corrosion. Corrosion concerns occur at much lower levels than the secondary drinking water standard of 250 mg/liter for chlorides. While it appears that adequate dilution of chlorides will occur in Cove Creek and then in the Ouachita River, the ADH requests that discharges from the mine site be designed such that lower flow and continuous discharge protocols are favored over higher flow and periodic discharges. This should serve to minimize minerals concentration variations seen by downstream water users and thus facilitate consistency in drinking water treatment.

If you have any questions regarding these comments, please feel free to coordinate them through Darcia Routh at (501) 661-2856.

Sincerely,

Jeff Stone, P.E.

Director, Engineering Section Arkansas Department of Health

CC:

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JS: LG: DR: sp