ADEQ
ARKANSAS
Department of Environmental Quality

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Return Receipt Requested

November 6, 2012

U.S. EPA Region 6
Attn: Mr. Ruben Moya
Mail Code: 6SF
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: Monthly Progress Report–September 2012
Arkwood, Inc. Site, Omaha, Arkansas

Dear Mr. Moya:

The Arkansas Department of Environmental Quality - Hazardous Waste Division (ADEQ) has received the Monthly Progress Report–September 2012 for Arkwood, Inc. Site, Omaha, Arkansas dated October 10, 2012. After reviewing the report ADEQ has the following comments:

1. According to the email from Jean Mescher, McKesson, dated October 3, 2012 provided with the subject report, samples cannot be obtained 20 feet downstream from the weir as requested by ADEQ during periods of low flow since the effluent "sinks into the subsurface before reaching the culvert". This statement describes the effluent returning to a subsurface status and therefore returning to the state of groundwater. For this reason the Maximum Contaminant Level (MCL) for pentachlorophenol (PCP) of 1.0 ug/l should be used in lieu of the aquatic toxicity standard of 15.57 ug/l which is currently used.

2. Due to the concern discussed in Comment 1 above, a review was performed of past correspondence for clarification concerning applicable risk levels. During the review, it was noticed that the ADEQ water quality standard of 15.57 ug/l is apparently being used as the screening level for PCP in lieu of the MCL of 1.0 ug/l. However, this standard pertains to aquatic toxicity only and does not address potential human health concerns. Even as it is apparently assumed that the stream is not a source for potable water, the MCL of 1.0 ug/l should be the applicable screening level for the following reasons:

    - Much of the groundwater which rises from the spring and becomes surface water returns to groundwater and appears to migrate offsite, as groundwater.

    - According to past correspondence, it appears the consensus of the EPA, ADEQ and McKesson, that some groundwater is circumventing the spring and migrating beyond the spring as groundwater.

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3. Since the MCL for PCP is applicable for potential risk evaluation, the minimum reporting limit for pentachlorophenol should be less than 1.0 ug/l and not the current reporting limit of 5.0 ug/l.

4. It is noted the increase in concentration to 73.2 ppb PCP at the mouth of New Cricket Spring occurred after onsite injection of clean water ceased. The flow from the spring was 0.4 gpm at the time of sampling. It is recommended that monthly sampling and testing at the site continue as scheduled.

To address concerns discussed above, a minimum PCP reporting limit equal to or less than 1.0 ug/l is recommended for a mutually agreed upon limited period of time by the parties involved or may be used seasonally during low-flow conditions. If you have any comments or questions, please contact me at 501-682-0852 or via e-mail moix@adeq.state.ar.us.

Sincerely,

Mark Moix

Mark Moix
Engineer, PE
Technical Branch
Hazardous Waste Division

cc: Jean Mescher, McKesson Corporation