Richard Healey (adpce.ad)

From: Charles McDowell < CMcDowell@Isbindustries.com>

Sent: Monday, January 9, 2023 1:40 PM

To: Michael Young (adpce.ad); Richard Healey (adpce.ad)

Cc: Keith Long; Derek Turner

RE: UPDATE: El Dorado Chemical Company AR0000752 **Subject:**

At 10:30 this morning, we stopped discharging through Outfall 001. Lake Kildeer currently has 0.99 feet of freeboard.

Charles McDowell | Environmental Leader | LSB INDUSTRIES, Inc. (NYSE: LXU) | El Dorado Chemical Plant | 4500 North West Avenue, El Dorado, Arkansas 71731

☎ 0: 870-863-1403 | **□** M: 870-310-6696 | **᠌** E: email cmcdowell@lsbindustries.com

From: Charles McDowell

Sent: Thursday, January 5, 2023 9:48 AM

To: youngm@adeq.state.ar.us; Healey, Richard <healeyr@adeq.state.ar.us>

Cc: Keith Long <klong@lsbindustries.com>; Derek Turner <DTurner@lsbindustries.com>

Subject: UPDATE: El Dorado Chemical Company AR0000752

At approximately 7:08 this morning. The overflow for Lake Kildeer is no longer overflowing. It reached it's highest level at 9:00 am on the 2nd at 0.55 feet over the spillway. Due to being at the maximum level at Lake Kildeer, Outfalls 001 and 010 are continuing to discharge.

Charles McDowell | Environmental Leader | LSB INDUSTRIES, Inc. (NYSE: LXU) | El Dorado Chemical Plant | 4500 North West Avenue, El Dorado, Arkansas 71731

From: Charles McDowell

Sent: Tuesday, January 3, 2023 3:18 PM

To: youngm@adeq.state.ar.us; Healey, Richard <healeyr@adeq.state.ar.us>

Cc: Keith Long <klong@lsbindustries.com>; Derek Turner <DTurner@lsbindustries.com>

Subject: El Dorado Chemical Company AR0000752

Since July, El Dorado Chemical has been actively managing its discharges from Outfall 010, i.e., from Lake Killdeer, to be in compliance with Outfall 010 compliance parameters. Due to high rainfall and choosing to limit discharge volume through Outfall 010 the water level in Lake Killdeer was not able to be reduced as much as normal during the late summer months.

During the night, the facility received 3.5 inches of rain. Rainfall results in increased volume of Lake Killdeer from the plant footprint which all drains into Lake Killdeer, drainage from owned property outside the plant drainage system, and from non-owned off plant property. This rainfall coupled with the already high levels at Lake Kildeer caused the water depth to exceed the spillway height. This was discovered at 8:03 AM this morning. Notification was attempted at 8:11 am to ADEQ at 870.310.3804, but the line did not pick up. Richard Healey with ADEQ was notified at 8:17 AM.

To help reduce the Lake Killdeer water levels, El Dorado Chemical opened Outfall 001 at 8:19 AM in addition to maximizing the discharge from Outfall 010. Samples are being collected for each discharge, including the overflow.

Since October, El Dorado Chemical has been working with Barr Engineering to develop a plan to reduce the volume of water being sent to Lake Kildeer. Additionally, EDC is working on ways to reduce the loading of the Nitrates and Ammonia in the wastewater. As we develop this corrective action plan we will continue to keep ADEQ informed.

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To: Michael Young (adpce.ad); Richard Healey (adpce.ad)

Cc: Keith Long; Derek Turner

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Richard Healey (adpce.ad)

From: Charles McDowell < CMcDowell@Isbindustries.com>

Sent: Friday, December 30, 2022 8:38 AM

To: Michael Young (adpce.ad); Richard Healey (adpce.ad)

Cc: Derek Turner; Keith Long

Subject: Probable exceedance from Outfall 002 (El Dorado Chemical Company AR0000752)

Mr. Healey

Last night we had to discharge from Outfall 002. We typically do not discharge from this outfall due to stringent permit limits. We expect that we will exceed for ammonia and nitrate. During the night the transfer pumps shut down, this was discovered at approximately 3:00 am. We restarted the transfer pumps at 7:45 am this morning. If Outfall 002 had not be utilized, the levee would have overtopped resulting in an un permitted discharge.

Preliminary investigation shows that a power fluctuation due to the storm caused the PLC to lose it's programing. The battery backup for the PLC failed to protect it. We are currently conducting a more thorough investigation. We will provide details on the levels on Nitrate and Ammonia when we receive lab results early next week.

If you have any questions, feel free to contact me.

Charles McDowell | Environmental Leader | LSB INDUSTRIES, Inc. (NYSE: LXU) | El Dorado Chemical Plant | 4500 North West Avenue, El Dorado, Arkansas 71731

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