

Richard Healey (adpce.ad)

From: Charles McDowell <CMcDowell@lsbindustries.com>
Sent: Friday, January 12, 2024 9:37 AM
To: Richard Healey (adpce.ad); Water-Enforcement-Report
Cc: Keith Long; Howard Stevens
Subject: RE: EDCC, NPDES Permit AR0000752
Attachments: EDC Weekly Update 2024-1-12.docx; 2023-24 Waste Water Data.xlsx

Mr Healey,
Attached is the weekly update with the effluent data.

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

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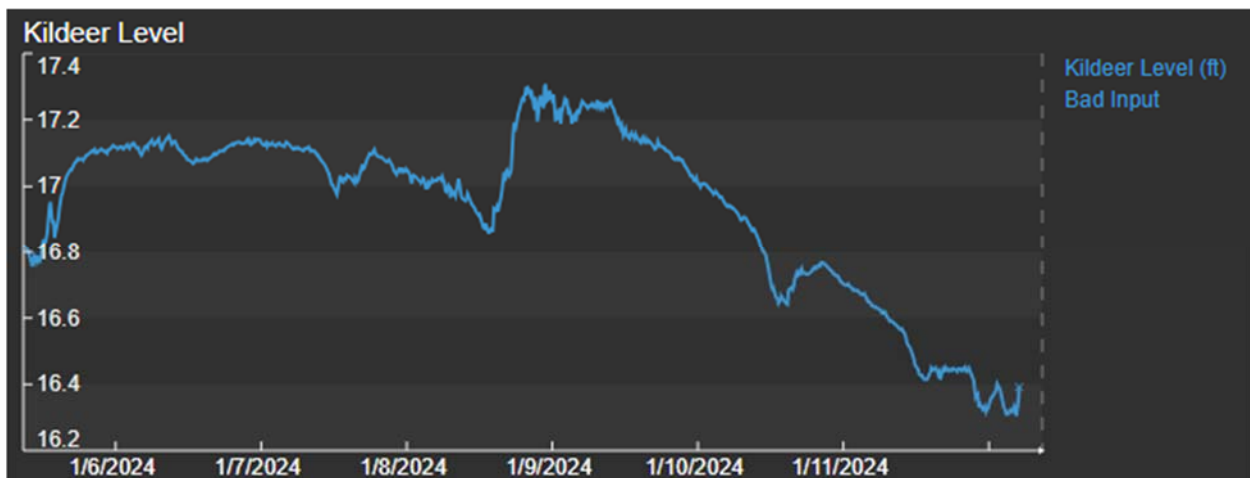
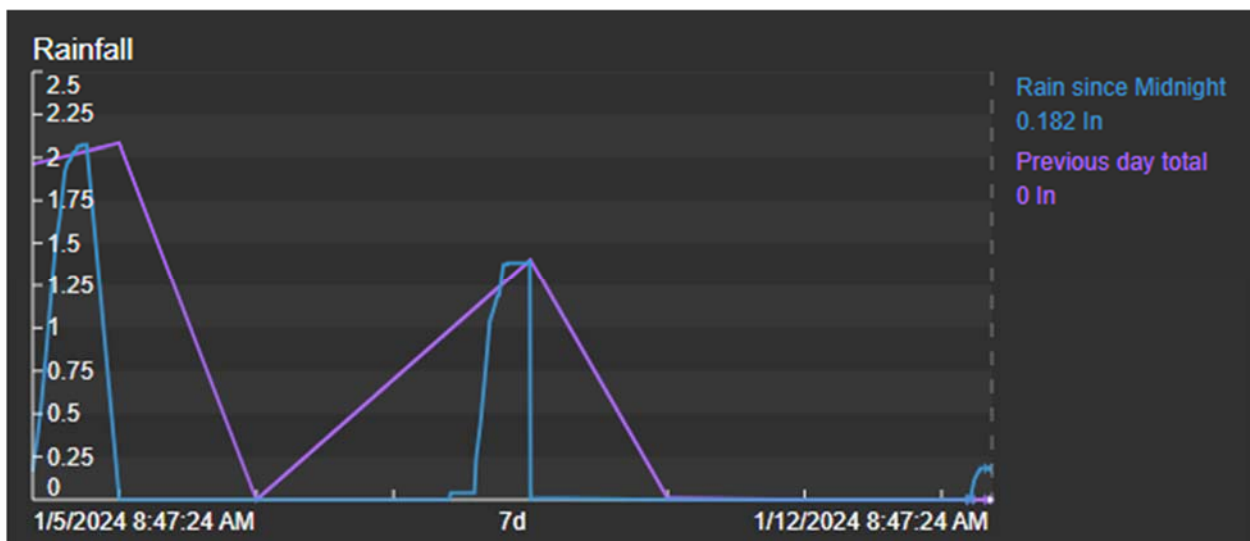
Weekly Report Required by Interim Measures Letter dated 8/4/2023

LSB Chemical Company, NPDES Permit Number: AR0000752, AFIN: 70-00040

Weekly Report Date: January 12, Updated portions are underlined.

Discharges and Implementation of Emergency Action Plan

LSB did not discharge any water through Outfall 001, Outfall 010, or the emergency spillway between when our interim measures plan was initiated on August 9th, 2023 and the 28th. Over the last week, the facility received 3.4 inches of rain. Based on the forecast we increased our discharge rate to 2.0 MGD on January 2nd. With the two rain events, we were unable to maintain the levels in Kildeer. On the 8th at 7:45 PM, we opened Outfall 001 to prevent Kildeer from overtopping the spillway. Kildeer is currently at 16.4 feet and the discharge from Outfall 010 has been reduced to 1.0 MDG. LSB has kept outfall 001 open in order to collect required WET testing samples based on a conversation with ADEQ and it will be closed today. This morning around 5 a.m. the pumps at Kildeer went down due to a power outage and we are working to restart them. Once restarted they will be operated in accordance with the approved discharge plan. LSB is attempting to keep the levels of Kildeer below 16.80 feet. In the event of additional rain, LSB will manage the discharge from Kildeer as necessary to ensure water does not overtop the emergency spillway in accordance with the August 4, 2023 Interim Measures letter.



Conduct Daily Sampling of Lake Lee, Lake Killdeer, and Pond 004

LSB commenced this required sampling on August 5, 2023. Updated Information is in the attached 2023 spreadsheet.

Provide Copies of Sampling of Lake Lee, Lake Killdeer, and Pond 004 Since January 1, 2023

Please see the LSB Interim Measures response dated August 9, 2023.

Corrective Action Plan Activities [updates from the previous week are underlined]

During our August 17th conference call we discussed that these proposed activities may trigger a communication to the ADEQ and possible permit changes. We will continue to communicate plans and improvements to obtain ADEQ's guidance on proper permitting.

Minimize Wastewater Contaminant Loading

Water Reuse:

LSB has evaluated its processes to assess locations where water can be reutilized in processes. Currently we are reusing as much wastewater as possible, that would otherwise flow into Pond 004, and are reusing some water from Pond 004 when the opportunity arises.

Minimize Wastewater Inflow

LSB has diverted approximately 15% of the water flowing into Pond 004. Parts are now on order that will allow us to divert approximately an additional 15% of stormwater from Pond 004. Work has started to prepare to have the valves installed. All valves are expected to arrive in December. It is expected to have these installed and operation by the first quarter of 2023. LSB met with ADEQ on the 19th to discuss permit applicability. Based on the discussions this action will not require a construction permit. Physical work on the project has started. Additionally, we have started an engineering study to divert additional water away from the Ammonia Nitrate facility. This project will focus on paving in and around the Ammonia Nitrate area and is upstream of any waste/process water connections and will not require a construction permit. LSB has utilized seven frac tanks to increase the storage capacity of Ammonia Nitrate water to reduce the overflow into Pond 004 from rain events.

Maximize Treatment Efficiency and Capacity

Lake Lee Ammonia Stripper

LSB continues to operate the ammonia stripper with an approximate 20% efficiency.

Short Term Treatment of Pond 004

LSB has met with Clean Harbors to develop a short-term treatment system (approximately one year) to provide treatment pending implementation of a permanent solution. LSB has collected samples for Clean Harbors to develop a short-term biological treatment system. Clean Harbors proposed a secondary solution utilizing membrane filtration. This may be a viable alternative; however, it will create a further concentrated wastewater stream that will have to be managed. After further investigation, this process is not viable.

LSB met with Black & Veatch, a wastewater consulting firm, to determine the best treatment possibilities for Pond 004. Based on these initial conversations a biological system seems to be the best path forward. The B&V report was attached in the 13 Oct 2023 report.

Based on review of the Black and Veatch data, LSB is proceeding with biological treatment of 004, but we are still assessing how to address treatment barriers such as predilution, carbon addition, and sludge generation. LSB has evaluated two existing package plants that would be moved to El Dorado to facilitate biological treatment. This will allow LSB to avoid long lead times on construction of new units and have a solution in place soon. This will probably require permit coverage from ADEQ.

Working with Borderland Construction who is developing a cost estimate for disassembling the package plants and shipping them from Arizona to ELD. LSB is attempting to get the units onsite by the end of the calendar year, however with the numerous entities involved this is ambitious and may not be achieved within that timeframe. It now appears the units will be on site in January. A construction permit will be submitted as soon as engineering is completed.

Working with Black and Veatch to develop a written plan to use these package plants in the setup they are proposing. Provide modifications and changes to adapt these package plants for the El Dorado wastewater contaminants. Once the plans are developed, we can propose permit modification to facilitate this. We are currently developing a list of longer lead time items (i.e. Transformers) to try to find alternative sources of procurement to prevent unforeseen delays.

LSB internal engineering is evaluating siting and location for these package plants, this has been narrowed down to two locations. LSB contracted HSG to do site investigations for the foundation and to develop the foundation plans.

Additionally, we are evaluating possibilities of reuse of the process wastewater as an input into a product.

Increased Efficiency in Lake Killdeer Biological Activity

Based upon discussion with supplier of nitrification/denitrification bacteria, LSB will begin dosing Lake Killdeer with calcium carbonate or magnesium carbonate to increase the available of carbon and alkalinity in Lake Killdeer. Increasing available carbon should promote additional biological activity to reduce the amount of ammonia in Lake Killdeer and the effluent discharge. LSB has also ordered one ton of lime and will begin dosing Lake Lee with the lime in efforts to increase alkalinity in Lake Lee which flows into Lake Killdeer. Before any dosing begins a construction, permit will be submitted.

Baffles in Lake Killdeer

LSB selected a vendor to install baffles in Lake Killdeer. As discussed in our August 17th conference call, this should promote longer residence time and further increase biological activity to reduce the amount of ammonia in Lake Killdeer and the effluent discharge. Baffles have arrived onsite. Construction drawings and design basis have been submitted to apply for the construction permit. A teleconference was conducted on the 19th with ADEQ to discuss the path forward. ECD is working with Alliance Technical Group to develop the application and is expected to be completed next week. The installation is expected to be completed in the first quarter of 2024.

Water Quality Sampling Results

Water quality sampling required by the Interim Measures letter is included in the attached 2023 spreadsheet.

Water Column Profile Measurements

LSB has contracted with Alliance Technology Group (formerly GBMc) to complete the profile and sampling of Pond 004, Lake Lee, and Lake Killdeer. The field work was completed on September 28th.

KT French Drain

KT French Drain is located south west of the KT plant on the west edge of the facility. Water is collected in a wet well then pumped back into the facility, much like a municipality utilized lift stations. During the previous inspection the pump was not operating and the wet well was overflowing. LSB has implemented daily inspections to ensure that the pump remains operational.

As requested, LSB collected samples from KT Wier. Samples collected on December 8th were collected based on the December 7, 2023 conversation with ADEQ and before we received the official request thus all requested in-situ parameters were not collected. Data is presented below:

Date	Temp	pH	D.O.	Cond.	Ammonia mg/l	Nitrate mg/l	Nitrite mg/l	Total – N mg/l	Nitrate + Nitrite
12-8-2023	NA	4.35	NA	79,150	6,600	10,351	0.43	16,951.4	10,351.4
12-12-2023	16	4.40	5.63	79,250	6,500	10,633	0.41	16,833.4	10,633.4
12-14-2023	18	4.37	5.16	77,440	6,350	10,669	0.46	17,019.46	10,669.46
12-19-2023	16	4.35	6.16	78630	12080	11,477	ND	23,557	11,477
12-21-2023	18	4.35	5.43	77,750	9200	11,108	ND	20,308	11,108

Other Actions

Derek Turner has stepped down as the general manager effective the 4th of January. Howard Stevens is the new General Manager for the facility. All documentation has been submitted through ePortal and hard copies were mailed on the 4th of January.

In this call LSB was informed we need to obtain a wastewater operator's license as quickly as possible. Charles McDowell is planning on completing the advanced industrial wastewater class in March. LSB currently has a three certified operators. Second, ADEQ advised that LSB should coordinate with other Joint Pipeline members regarding discharges and volumes. We have initiated this communication.

LSB has contracted Alliance Technology to conduct a bathometric survey of 004. The results of the study indicate that Pond 004 contains approximately 1.5 Million Gallons of water.

Date	Lake Killdeer (KD)									Lake Lee							Pond 004								
	KD Grab Sample	KD Grab Sample	KD Composite EDCC LAB	KD Grab Sample	KD Composite EDCC LAB	KD Composite EDCC LAB	KD Composite EDCC LAB	KD Composite EDCC LAB	KD Composite EDCC LAB	LEE Grab Sample	LEE Grab Sample	Lee Composite EDCC LAB	LEE Grab Sample	Lee Composite EDCC LAB	Lee Composite EDCC LAB	Lee Composite EDCC LAB	Lee Composite EDCC LAB	004 Grab	004 Grab	004 Grab	004 Grab	004 Grab	004 Grab	004 Grab	004 Grab
Time of Grab	Temp °C	pH	DO, ppm	Conductivity	NH _{3-N} , ppm	NO _{3-N} , ppm	P, ppm	SO ₄ ppm	Time of Grab	Temp °C	pH	DO, ppm	NH _{3-N} , ppm	NO _{3-N} , ppm	Phosphorous, ppm	SO ₄ ppm	DATE/ TIME	Temp °C	DO, ppm	pH	Conductivity	NH _{3-N} , ppm	NO _{3-N} , ppm	SO ₄ ppm	
6/21/2023				6.60	1688	115	131	138					7.31	141	153	201									
6/22/2023													6.86	123	130	322									
6/23/2023				6.68	1705	115	133	141					7.17	101	116	287									
6/24/2023													6.84	78	94	200									
6/25/2023													7.14	55	69	199									
6/26/2023				6.69	1690	119	130	1.32	143				6.72	49	54	184									
6/27/2023													7.02	125	136	180									
6/28/2023				6.75	1672	122	127		142				7.61	195	201	143									
6/29/2023													7.82	192	194	146									
6/30/2023				6.64	1720	119	133		141				7.97	132	164	167									
7/1/2023													7.59	108	126	167									
7/2/2023													7.23	75	100	167									
7/3/2023				6.69	1730	120	137	1.38	144				7.09	72	86	149									
7/4/2023													7.06	51	67	158									
7/5/2023				6.77	1724	125	133		142				6.82	102	116	152									
7/6/2023													6.96	188	209	172									
7/7/2023				6.74	1720	116	132		140				7.62	186	223	161									
7/8/2023													7.66	134	130	186									
7/9/2023													8.21	132	126	195									
7/10/2023				6.75	1780	130	136	5.24	140				8.16	209	231	155									
7/11/2023													7.88	157	196	125									
7/12/2023				6.64	1782	102	113		139				5.74	52	66	73									
7/13/2023													8.49	136	215	75									
7/14/2023				7.50	2240	179	69		34				8.22	281	119	36	07/14/23			9.02	24910	4320	2989	2	
7/15/2023													8.29	278	323	109									
7/16/2023													8.50	231	270	110									
7/17/2023				6.98	1890	151	153	6.08	112				8.35	222	229	124									
7/18/2023													8.03	167	189	122									
7/19/2023				6.95	1820	143	143		104				7.92	133	143	110									
7/20/2023													8.17	128	137	170									
7/21/2023				6.91	1804	140	141		108				8.05	120	129	123									
7/22/2023													7.49	95	93	113									
7/23/2023													6.86	86	82	121									
7/24/2023				6.90	1763	125	136	2.03	110				7.69	86	90	133									
7/25/2023													7.38	72	79	146									
7/26/2023				6.85	1764	126	134		110				7.22	58	72	125									
7/27/2023													7.43	53	57	101									
7/28/2023				6.84	1753	120	132		110				8.14	36	42	121									
7/29/2023													8.27	16	30	107									
7/30/2023													6.99	10	24	121									
7/31/2023				6.83	1745	128	129	1.96	110				7.19	13	20	119									
8/1/2023													6.92	64	75	126									
8/2/2023				6.77	1726	114	128		111				7.09	38	51	122									
8/3/2023													8.10	16	32	113									
8/4/2023				6.79	1710	119	126		111				7.44	9	22	143									
8/5/2023	8:53AM	28	6.79	7.65	1703	114	125			6:00AM	26	6.60	6.03	6	17	1.22	147	11:20am	34	10.63	7.14	48920	5280	6293	25
8/6/2023	9:57AM	29	6.77	8.27	1676	105	123			6:00AM	25	6.45	6.12	6	15	125	10:09AM	27	6.02	6.95	49870	6200	6657	20	
8/7/2023	8:25AM	26	6.80	6.45	1683	115	124	1.75	113	7:00AM	27	6.48	7.69	7	14	115	8:40AM	30	6.5	6.84	49750	6240	6216	33	
8/8/2023	8:45AM	26	6.84	6.13	1678	114	124			7:00AM	26	6.81	6.08	10	18	111	8:53AM	25	5.62	6.81	34560	4260	4281	22	
8/9/2023	8:13AM	27	7.11	7.34	1584	114	120			7:00AM	24	7.26	7.86	102	102	80	8:39AM	25	6.63	6.63	29930	3660	3553	18	