Richard Healey (adpce.ad)

Subject: FW: 11-17-23 Weekly Update

EDC Weekly Update 17 Nov 2023.docx; EFFLUENT LOGSHEET 2023.xls **Attachments:**

From: Charles McDowell < CMcDowell@Isbindustries.com>

Sent: Friday, November 17, 2023 1:59 PM

To: Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Water-Enforcement-Report <Water-Enforcement-

Report@adeq.state.ar.us>

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

Subject: RE: 10/6/2023 Weekly Update

Mr Healey,

Attached is the weekly update with the effluent data. 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



☎ O: 870-863-1403 | 🚨 M: 870-310-6696 | 🚨 E: email cmcdowell@lsbindustries.com

From: Charles McDowell

Sent: Friday, November 10, 2023 12:27 PM

To: 'Richard Healey (adpce.ad)' <Richard.Healey@adeq.state.ar.us>; 'Water-Enforcement-Report' <water-enforcementreport@adeq.state.ar.us>

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

Subject: RE: 10/6/2023 Weekly Update

Mr Healey,

Attached is the weekly update with the effluent data. 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



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

From: Charles McDowell

Sent: Friday, November 3, 2023 1:26 PM

To: 'Richard Healey (adpce.ad)' <Richard.Healey@adeq.state.ar.us>; 'Water-Enforcement-Report' <water-enforcementreport@adeq.state.ar.us>

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

Subject: RE: 10/6/2023 Weekly Update

Mr Healey,

Attached is the weekly update with the effluent data. We are currently in the waiting stage on several projects. 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
☎ O: 870-863-1403
From: Charles McDowell Sent: Thursday, October 26, 2023 3:33 PM To: 'Richard Healey (adpce.ad)' < Richard. Healey@adeq.state.ar.us>; 'Water-Enforcement-Report' < water-enforcement-
report@adeq.state.ar.us>
Cc: Keith Long < klong@lsbindustries.com >; Derek Turner < DTurner@lsbindustries.com > Subject: RE: 10/6/2023 Weekly Update
Mr Healey, Attached is the weekly update with the effluent data. There are two data points for Nitrate in Lake Kildeer that appear to be laboratory errors, this in noted in the report, but not in the spreadsheet. 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 C: 870-863-1403 M: 870-310-6696 E: email cmcdowell@lsbindustries.com
From: Charles McDowell Sent: Friday, October 20, 2023 10:34 AM To: 'Richard Healey (adpce.ad)' < Richard. Healey@adeq.state.ar.us>; 'Water-Enforcement-Report' < water-enforcement-
report@adeq.state.ar.us> Cc: Keith Long < <u>klong@lsbindustries.com</u> >; Derek Turner < <u>DTurner@lsbindustries.com</u> > Subject: RE: 10/6/2023 Weekly Update
Mr Healey, Attached is the weekly update with the effluent data. 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
☎ O: 870-863-1403 ☐ M: 870-310-6696 ⚠ E: email <u>cmcdowell@lsbindustries.com</u>
From: Charles McDowell < CMcDowell@lsbindustries.com > Sent: Friday, October 13, 2023 1:56 PM
To: Richard Healey (adpce.ad) < <u>Richard.Healey@adeq.state.ar.us</u> >; Water-Enforcement-Report < <u>water-enforcement-report@adeq.state.ar.us</u> >
Cc: Keith Long < klong@lsbindustries.com >; Derek Turner < DTurner@lsbindustries.com > Subject: RE: 10/6/2023 Weekly Update
Mr Healey, Attached is the weekly update with the effluent data and as requested the Black and Veatch report. If you have any questions, feel free to contact me.

West Avenue, El Dorado, Arkansas 71731

O: 870-863-1403 | M: 870-310-6696 | E: email cmcdowell@lsbindustries.com

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

From: Richard Healey (adpce.ad) < Richard.Healey@adeq.state.ar.us>

Sent: Friday, October 13, 2023 1:22 PM

To: Charles McDowell < CMcDowell@lsbindustries.com>

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

Subject: RE: 10/6/2023 Weekly Update

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Charles

EDCC weekly report references a corrective action report by Black & Veatch. DEQ is requesting a copy of the this report. If you have any questions, please do not hesitate to ask.

Thanks

Richard C. Healey | Enforcement Branch Manager
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: 501-682-0640| e: richard.healey@adeq.state.ar.us



From: Charles McDowell < CMcDowell@lsbindustries.com >

Sent: Friday, October 6, 2023 11:42 AM

To: Water-Enforcement-Report < Water-Enforcement-Report@adeq.state.ar.us>

Cc: Richard Healey (adpce.ad) < <u>Richard.Healey@adeq.state.ar.us</u>>; Keith Long < <u>klong@lsbindustries.com</u>>; Derek Turner

<DTurner@lsbindustries.com>

Subject: RE: 10/6/2023 Weekly Update

Please find attached the weekly update, stratification memo, and updated 2023 water parameters for El Dorado Chemical Company.

If you have any questions or concerns, please do not hesitate to contact me.

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

west Avenue, El Dorado, Arkansas 7173.

From: Charles McDowell

Sent: Friday, September 29, 2023 10:05 AM

To: 'water-enforcement-report@adeq.state.ar.us' < water-enforcement-report@adeq.state.ar.us>

Cc: 'Richard Healey (adpce.ad)' < Richard. Healey@adeq.state.ar.us>; Keith Long < klong@lsbindustries.com>; Derek

Turner < DTurner@lsbindustries.com> Subject: RE: 9/29/2023 Weekly Update

Please find attached the weekly update, and updated 2023 water parameters for El Dorado Chemical Company.

If you have any questions or concerns, please do not hesitate to contact me.

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, September 19, 2023 2:25 PM

To: 'water-enforcement-report@adeq.state.ar.us' < water-enforcement-report@adeq.state.ar.us >

Cc: 'Richard Healey (adpce.ad)' <Richard.Healey@adeq.state.ar.us>; Keith Long <klong@lsbindustries.com>; Derek

Turner <DTurner@lsbindustries.com> Subject: RE: 9/5/2023 Weekly Update

Please find attached the weekly update, and updated 2023 water parameters for El Dorado Chemical Company.

If you have any questions or concerns, please do not hesitate to contact me.

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, September 12, 2023 4:23 PM To: water-enforcement-report@adeq.state.ar.us

Cc: Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Keith Long <klong@lsbindustries.com>; Derek Turner

<DTurner@lsbindustries.com>

Subject: RE: 9/5/2023 Weekly Update

Please find attached the weekly update, and updated 2023 water parameters for El Dorado Chemical Company.

If you have any questions or concerns, please do not hesitate to contact me.

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, September 5, 2023 2:22 PM

To: 'water-enforcement-report@adeq.state.ar.us' <water-enforcement-report@adeq.state.ar.us>

Cc: 'Richard Healey (adpce.ad)' <Richard.Healey@adeq.state.ar.us>; Keith Long <klong@lsbindustries.com>; Derek

Turner < <u>DTurner@lsbindustries.com</u>> **Subject:** 9/5/2023 Weekly Update

Please find attached the weekly update and updated 2023 water parameters for El Dorado Chemical Company.

If you have any questions or concerns, please do not hesitate to contact me.

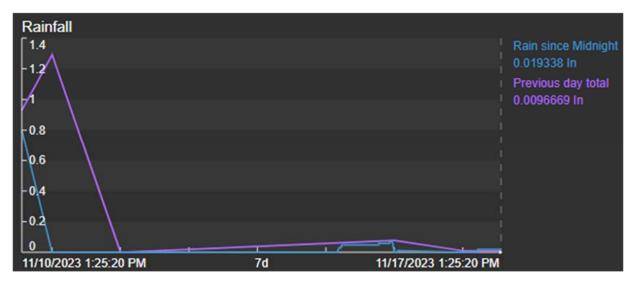
Charles McDowell | Environmental Leader | LSB INDUSTRIES, Inc. (NYSE: LXU) | El Dorado Chemical Plant | 4500 North West Avenue, El Dorado, Arkansas 71731

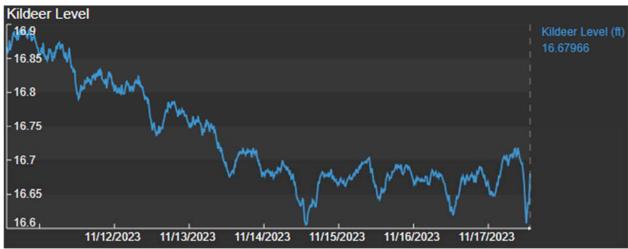
Weekly Report Required by Interim Measures Letter dated 8/4/2023

El Dorado Chemical Company, NPDES Permit Number: AR0000752, AFIN: 70-00040 Weekly Report Date: November 3, 2023 Updated portions are underlined.

Discharges and Implementation of Emergency Action Plan

EDC 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 approximately 0.1 inches of rain, however at the end of the previous week we received 1.3 inches. Lake Killdeer levels are currently at 16.68 feet. EDC is attempting to keep the levels of Kildeer below 17.0 feet. Entering this week, EDC increased our discharge rate to 2.0 MGD due to previous rain, on the 14th, we dropped our discharge rate to 1.0 MGD. In the event of additional rain, EDC 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

EDC 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 EDC 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:

EDC 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

EDC 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. The valves are expected to arrive in December. It is expected to have these installed and operation by the first quarter of 2023. 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. EDC 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

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

Short Term Treatment of Pond 004

EDC has met with Clean Harbors to develop a short-term treatment system (approximately one year) to provide treatment pending implementation of a permanent solution. EDC 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.

EDC 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, EDC 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. EDC has evaluated two existing package plants that would be moved to El Dorado to facilitate biological treatment. This will allow EDC 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. <u>EDC 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.</u>

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.

Evaluating siting and location where to put these package plants with internal engineering in a location near the Pond 004 outfall area.

Contacted local Geotech engineer in Little Rock to provide estimate for sub-surface geo survey to determine how to design package plant foundations.

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, EDC 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. EDC 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 Kildeer.

Baffles in Lake Killdeer

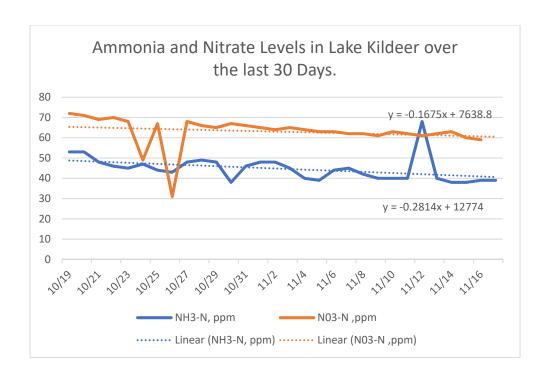
EDC selected a vendor to install baffles in Lake Killdeer. As discussed in our August 17th conference call, this should promote longer residence time and further increase biological activity to reduce the amount of ammonia in Lake Killdeer and the effluent discharge. <u>Baffles are expected to arrive in January</u>. 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. The increase in ammonia and nitrate in Lake Lee was due to Pond 004 overflowing into Lake Lee from the 11th to the 14th.

Water Column Profile Measurements

EDC 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.



Other Actions

In this call EDC was informed we need to obtain a wastewater operator's license as quickly as possible. Charles McDowell has completed the wastewater operator course work has successfully passed the testing for industrial wastewater operator on the 27th of this month. EDC currently has a third certified operator. Second, ADEQ advised that EDC should coordinate with other Joint Pipeline members regarding discharges and volumes. We have initiated this communication.

EDC 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.

EDC would like to offer for some of our staff to visit the Little Rock ADEQ office to discuss our corrective actions, permit implications, and the appropriate path forward. If this would be advantageous for ADEQ, let us know when this would work for your schedule.

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