

Richard Healey (adpce.ad)

Subject: FW: 9/19/2023 Weekly Update
Attachments: 2023 Waste Water Data.xlsx; EDC Weekly Update 19 sept 23.docx

From: Charles McDowell <CMcDowell@lsbindustries.com>
Sent: Tuesday, September 19, 2023 2:25 PM
To: Water-Enforcement-Report <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

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

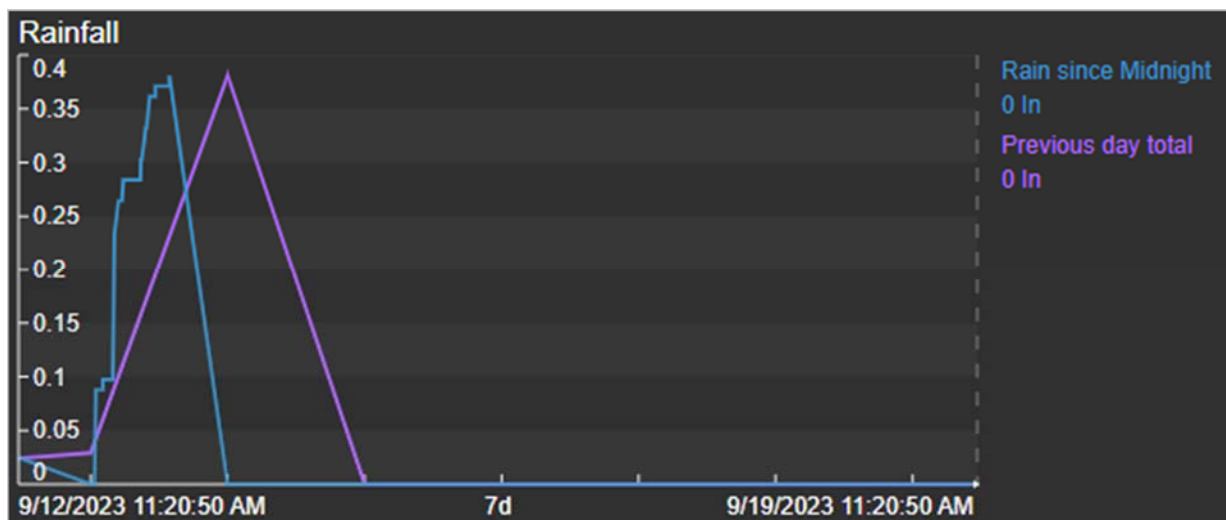
Weekly Report Required by Interim Measures Letter dated 8/4/2023

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

Weekly Report Date: Sept 19, 2023 Updated portions are underlined.

Discharges and Implementation of Emergency Action Plan

EDC has not discharged 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 0.4 inches of rainfall. Killdeer levels are currently at 16.86 feet. EDC is attempting to keep the levels of Kildeer below 17.0 feet and once we dropped below 17.0 feet, we lowered our discharge rate to approximately 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. We are currently evaluating additional steps that can be taken. However, these steps will require engineering assessments to ensure that we do not create unforeseen second-order challenges. EDC has utilized frac tanks to increase the storage capacity of Ammonia Nitrate water to reduce the overflow into Pond 004 from rain events. During the previous rain event it did not appear that any process water overflowed into 004.

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. The biological treatment system proposed is not viable due to the volume of solid waste that would be generated (16,000 lbs per day). Clean Harbors proposed a secondary solution utilizing membrane filtration. This may be a viable alternative; however, it will create a further concentrated waste water stream that will have to be managed.

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. EDC is waiting on the report from the meeting, it is expected this week.

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 Killdeer.

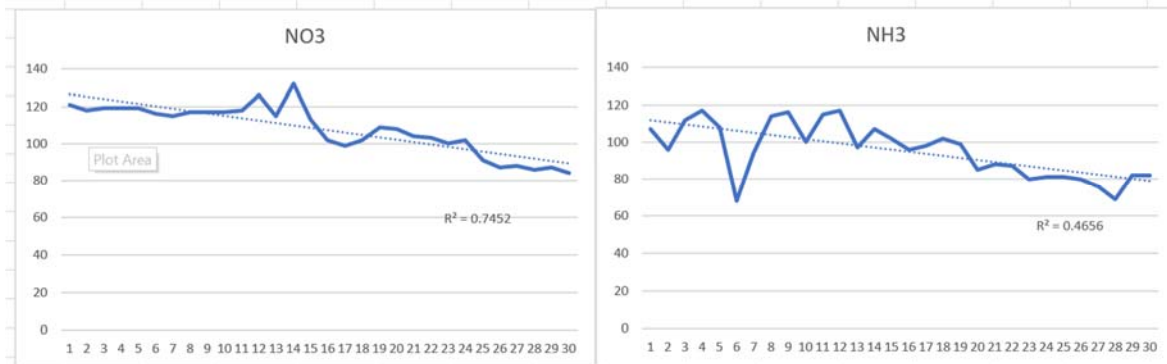
Baffles in Lake Killdeer

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.

Water Quality Sampling Results

Water quality sampling required by the Interim Measures letter are included in the attached 2023 spreadsheet. For the ammonia data for 004, on the 6th through the 10th, the sample testing did not result in complete release of ammonia, resulting in lower levels of ammonia being reported.

Thirty Day trendline for ADEQ requested daily sampling at Lake Killdeer.



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 the 28th, final results are pending.

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 and will be taking the wastewater operator exam on the 27th of this month, but if we encounter any delays we will look into contracting for this capability. Second, ADEQ advised that EDC should coordinate with other Joint Pipeline members regarding discharges and volumes. We have initiated this communication.

EDC plans to continue all measures outlined in the interim measure response submitted to ADEQ. We request to shift from weekly reports to the reporting outlined in the Notice of Non-Compliance Corrective action plan. In that report we will update the information listed in this weekly report in addition to the data indicated in the Corrective Action Plan.

2023	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			
	Date	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	
3/28																											
3/29			7.12			1620	130	134				7.13			132	143		178									
3/30												7.16			140	141		140									
3/31			6.98			1622	119	136				7.18			126	129		123									
4/1												7.01			87	103		107									
4/2												7.30			68	76		93									
4/3			7.16			1588	122	134	0.04			7.92			53	70		127									
4/4												7.10			67	77	1.01	115									
4/5			7.04			1867	164	167				7.56			141	134		103	04/04/23			8.33	70340	10060	9506	28	
4/6												7.54			139	148		99									
4/7			6.87			1806	159	166				6.95			168	170		122									
4/8												6.78			272	294		97									
4/9												6.94			330	343		112									
4/10			7.04			2042	169	188	0.00			9.95			164	248		97									
4/11												7.36			175	190	0.24	99									
4/12			7.00			1814	140	162				7.02			136	141		154									
4/13												6.58			87	122		149	04/12/23			8.61	39320	4400	5032	20	
4/14			6.90			1675	132	146				6.47			78	109		138									
4/15												5.86			63	81		231									
4/16												6.24			47	56		182									
4/17			7.18			1598	131	140	1.42			6.56			30	44		171									
4/18												5.56			72	82	1.28	205									
4/18												7.03			64	61		272	04/18/23			7.68	57620	8240	3691	16	
4/19			6.75			1615	131	141				6.94			35	36		233									
4/20												6.89			19	21		198									
4/21			6.82			1580	124	137				6.37			18	20		178									
4/22												5.21			75	87		202									
4/23												5.42			181	199		187									
4/24			7.03			1565	130	133	1.41			6.26			210	212	2.70	179									
4/25												6.89			175	177		191									
4/26			7.02			1582	121	137				6.95			109	117		219									
4/27												6.65			93	95		184									
4/28			6.93			1570	112	135				5.71			140	154		162									
4/29												7.63			142	180		174									
4/30												6.82			169	204		176									
5/1			6.87			1611	112	139	1.46			5.50			122	169	2.02	189									
5/2												7.18			133	150		246									
5/3			6.82			1633	122	140				7.03			95	108		191									
5/4												6.73			57	68		168									
5/5			6.85			1628	120	138				4.68			44	51		209									
5/6												6.94			73	89		210									
5/7												8.07			95	108		152									
5/8			6.88			1613	123	139	1.24			8.19			81	97	1.50	122									
5/9												7.58			163	157		75									
5/10			6.65			1588	120	132				7.55			335	361		82	05/10/23			8.71	34840	5080	4463	26	
5/11												7.60			323	332		139									
5/12			6.81			1841	138	161				7.02			208	243		90									
5/13												7.19			213	235		171									
5/14												7.15			164	187		169									
5/15			6.80			1805	142	156	1.61			7.71			138	156	2.96	192									
5/16												7.63			103	119		176									
5/17			6.86			1812	138	158				7.36			81	105		171									
5/18												7.35			81	95		175									
5/19			7.03			1825	145	160				7.21			64	75		176									
5/20												6.68			52	65		170									
5/21												6.27			111	133		171									
5/22			6.97			1786	143	155	1.79			6.51			182	199	2.72	194									
5/23												6.78			142	158		221									
5/24			7.10			1758	117	153				6.72			75	103		206									
5/25												6.55			68	83		405									
5/26			6.73			1760	135	149				3.80			63	65		672									
5/27												3.32			46	49		511									
5/28												3.17			30	48		432									
5/29			6.18			1740	122	146	0.32			3.14			20	53	1.12	332									
5/30												3.67			16	32		298									
5/31			6.59			1734	119	146				4.88			14	20		283									
6/1												6.67			11	13		275									
6/2			6.73			1721	120	147				7.24			7	10		234									
6/3												7.25			4	9		199									
6/4												7.36			6	9		227									
6/5			6.68			1680	122	137	1.64			7.38			7	10	0.65	205									
6/6												7.25			7	10		192									
6/7			6.06			1674	116	135				7.27			8	10		205	06/07/23			7.42	79560	10600	10832	42	
6/8												7.49			6	18		259									
6/9			6.22			1655	114	132				7.60			5	23		202									
6/10												7.46			3	15		146									
6/11												6.35			12	26		190									
6/12			6.44			1624	116	126	1.31			6.70			30	42	0.22	197									
6/13												6.53			27	42		140									
6/14			6.55			1590	111</																				

2023	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	
Date	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			6.60		1688	115	131		138			7.31		141	153		201									
6/22												6.86		123	130		322									
6/23			6.68		1705	115	133		141			7.17		101	116		287									
6/24												6.84		78	94		200									
6/25												7.14		55	69		199									
6/26			6.69		1690	119	130	1.32	143			6.72		49	54	1.27	184									
6/27												7.02		125	136		180									
6/28			6.75		1672	122	127		142			7.61		195	201		143									
6/29												7.82		192	194		146									
6/30			6.64		1720	119	133		141			7.97		132	164		167									
7/1												7.59		108	126		167									
7/2												7.23		75	100		167									
7/3			6.69		1730	120	137	1.38	144			7.09		72	86	2.21	149									
7/4												7.06		51	67		158									
7/5			6.77		1724	125	133		142			6.82		102	116		152									
7/6												6.96		188	209		172									
7/7			6.74		1720	116	132		140			7.62		186	223		161									
7/8												7.66		134	130		186									
7/9												8.21		132	126		195									
7/10			6.75		1780	130	136	5.24	140			8.16		209	231	3.83	155									
7/11												7.88		157	196		125									
7/12			6.64		1782	102	113		139			5.74		52	66		73									
7/13												8.49		136	215		75									
7/14			7.50		2240	179	69		34			8.22		281	119		36	07/14/23			9.02	24910	4320	2989	2	
7/15												8.29		278	323		109									
7/16												8.50		231	270		110									
7/17			6.98		1890	151	153	6.08	112			8.35		222	229	4.11	124									
7/18												8.03		167	189		122									
7/19			6.95		1820	143	143		104			7.92		133	143		110									
7/20												8.17		128	137		170									
7/21			6.91		1804	140	141		108			8.05		120	129		123									
7/22												7.49		95	93		113									
7/23												6.86		86	82		121									
7/24			6.90		1763	125	136	2.03	110			7.69		86	90	2.89	133									
7/25												7.38		72	79		146									
7/26			6.85		1764	126	134		110			7.22		58	72		125									
7/27												7.43		53	57		101									
7/28			6.84		1753	120	132		110			8.14		36	42		121									
7/29												8.27		16	30		107									
7/30												6.99		10	24		121									
7/31			6.83		1745	128	129	1.96	110			7.19		13	20	1.34	119									
8/1												6.92		64	75		126									
8/2			6.77		1726	114	128		111			7.09		38	51		122									
8/3												8.10		16	32		113									
8/4			6.79		1710	119	126		111			7.44		9	22		143									
8/5	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	9:57AM	29	6.77	8.27	1676	105	123			6:00AM	25	6.45	6.12	6	15		125	9:50AM	28	5.61	7.07	49230	6200	6191	34	
8/7	8:25AM	26	6.80	6.45	1683	115	124	1.75	113	7:00AM	27	6.48	7.69	7	14		115	10:09AM	27	6.02	6.95	49870	6200	6657	20	
8/8	8:45AM	26	6.84	6.13	1678	114	124			7:00AM	26	6.81	6.08	10	18		111	8:40AM	30	6.5	6.84	49750	6240	6216	33	
8/9	8:13AM	27	7.11	7.34	1584	114	120			7:00AM	24	7.26	7.86	102	102		80	8:53AM	25	5.62	6.81	34560	4260	4281	22	
																		8:39AM	25	6.63	6.63	29930	3660	3553	18	