

NPDES Permit No. AR0000752
El Dorado Chemical Company
Outfall 010 Non-Compliance Report
September 2023

All parameters sampled at 010 were within permit limits except for the following:

Parameter	Date	Permit Limit	Sample Result
Nitrogen, ammonia total [as N] Daily Maximum	9/5/23	605 lbs./day	1324.03 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/6/23	605 lbs./day	1508.82 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/7/23	605 lbs./day	1525.82 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/12/23	605 lbs./day	1475.71 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/13/23	605 lbs./day	1492.87 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/14/23	605 lbs./day	1276.72 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/19/23	605 lbs./day	815.38 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/20/23	605 lbs./day	606.99 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/21/23	605 lbs./day	706.11 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/26/23	605 lbs./day	1243.78 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/27/23	605 lbs./day	1227.43 lbs./day
Nitrogen, ammonia total [as N] Daily Maximum	9/28/23	605 lbs./day	812.38 lbs./day
Nitrogen, nitrate total [as N] Daily Maximum	9/6/23	1568.3 lbs./day	1608.31 lbs./day
Nitrogen, ammonia total [as N] Monthly Average	9/1/23-9/30/23	265.2 lbs./day	1168.05 lbs./day
Nitrogen, ammonia total [as N] Monthly Average	9/1/23-9/30/23	581.3 lbs./day	1227.21 lbs./day
Solids, total suspended	9/5/23	Lab error, sample not run within holding time. Results received for analysis ran 1 day after holding time expired.	

Due to the numerous rain events over the last several months, the facility has maxed out its ability to reuse and recycle process wastewater streams. This results in elevated NH₃-N and NO₃-N in the storage lagoon. The site is investigating significant stormwater runoff into Lake Killdeer from the upslope areas surrounding Lake Killdeer that are not inside the production area footprint. Solutions to minimize this influent to Lake Killdeer are being evaluated. For a short-term solution, El Dorado Chemical Company has permitted a temporary cooling tower to operate as an ammonia stripper to remove ammonia from Lake Lee, this is a point upstream that directly discharges to Lake Killdeer. The cooling tower became operational on July 21st. Additionally, EDC is working to develop plans to reduce the source load at the facility and long-term treatment solutions. A corrective action plan was developed and submitted to ADEQ on August 9, 2023. EDC adjusted flows to decrease loadings when the risk

of overflowing into the emergency spillway was minimal. EDC has decreased the average ammonia loading by approximately 49% and average nitrate loading by approximately 39% since July 2023.

On 9/12/23, we received the report for samples sent on 9/5/23. When the results were being input into our records the next day, it was discovered that there was not an analysis for TSS. The lab was contacted, and we were informed that they failed to run the sample. At this point on 9/13/23, we were outside of the 7-day holding time for TSS. The sample was then analyzed out of holding time. and. The results were consistent with the analysis from the rest of the month, so the results were reported as part of the NetDMR. The reports with associated chains of custody are attached on the NetDMR.