LANCE R. LEFLEUR
DIRECTOR

KAY IVEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov
1400 Coliseum Blvd. 36110-2400 ▪ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ▪ FAX (334) 271-7950

DECEMBER 3, 2021

RICHARD K. STANLEY
PRESIDENT & CEO
TR MILLER MILL COMPANY INC
PO BOX 708
BREWTON, AL 36427

RE: **REVISED DRAFT PERMIT**
NPDES PERMIT NUMBER AL0000779

Dear Mr. Stanley:

Transmitted herein is a revised draft of the referenced permit.

We would appreciate your comments on the permit within **30 days** of the date of this letter. Please direct any comments of a technical or administrative nature to the undersigned.

By copy of this letter and the draft permit, we are also requesting comments within the same time frame from EPA.

Our records indicate that you are currently utilizing the Department's web-based electronic environmental (E2) reporting system for submittal of discharge monitoring reports (DMRs). The Department will be transitioning from the E2 Reporting System to the Alabama Environmental Permitting and Compliance System (AEPACS) for the submittal of DMRs on November 15, 2021. AEPACS is an electronic system that allows facilities to apply for and maintain permits as well as submit other required applications, registrations, and certifications. In addition, the system allows facilities to submit required compliance reports or other information to the Department. The Department will be using the E2 User account information to set up a similar User Profile in AEPACS based on the following criteria:

1. The user has logged in to E2 since October 1, 2019; and
2. The E2 user account is set up using a unique email address.

Once the transition to AEPACS occurs, E2 users that meet the above criteria will only need to establish an ADEM Web Portal account (https://prd.adem.alabama.gov/awp) under the same email address as their E2 account to have the same permissions in AEPACS as they did in E2. They will also automatically be linked to the same facilities they were in E2.

The Alabama Department of Environmental Management encourages you to voluntarily consider pollution prevention practices and alternatives at your facility. Pollution Prevention may assist you in complying with effluent limitations, and possibly reduce or eliminate monitoring requirements.

If you have questions regarding this permit or monitoring requirements, please contact Isabelle Berry by e-mail at **isabelle.berry@adem.alabama.gov** or by phone at **(334) 271-7851.**

Sincerely,

Scott Ramsey, Chief
Industrial Section
Industrial/Municipal Branch
Water Division

Enclosure: Draft Permit

pc via website: Montgomery Field Office
EPA Region IV
U.S. Fish & Wildlife Service
AL Historical Commission
Advisory Council on Historic Preservation
Department of Conservation and Natural Resources

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

Alabama Department of Environmental Management

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE: T R MILLER MILL COMPANY INC

FACILITY LOCATION: T R MILLER MILL COMPANY INC
215 DEER ST
BREWTON, AL 36426

PERMIT NUMBER: AL0000779

RECEIVING WATERS: DSN002: MURDER CREEK
DSN003: UNNAMED TRIBUTARY TO MURDER CREEK

*In accordance with and subject to the provisions of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §§1251-1388 (the "FWPCA"), the Alabama Water Pollution Control Act, as amended, **Code of Alabama 1975**, §§ 22-22-1 to 22-22-14 (the "AWPCA"), the Alabama Environmental Management Act, as amended, **Code of Alabama 1975**, §§22-22A-1 to 22-22A-17, and rules and regulations adopted thereunder, and subject further to the terms and conditions set forth in this permit, the Permittee is hereby authorized to discharge into the above-named receiving waters.*

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:

Draft

Alabama Department of Environmental Management

INDUSTRIAL SECTION
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT

TABLE OF CONTENTS

PART I DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN0021: Treated process wastewater and treated groundwater.

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Oxygen, Dissolved (DO)	-	-	REPORT mg/l	-	-	Monthly	Grab	-
BOD, 5-Day (20 Deg. C)	4.05 lbs/day	6.07 lbs/day	-	-	-	Monthly	Grab	-
pH	-	-	6.0 S.U.	-	9.0 S.U.	Weekly	Grab	-
Oil & Grease	4.18 lbs/day	8.36 lbs/day	-	-	-	Monthly	Grab	-
Nitrogen, Ammonia Total (As N)	2.7 lbs/day	4.05 lbs/day	-	-	-	Monthly	Grab	-
Nitrogen, Kjeldahl Total (As N)	5.4 lbs/day	8.1 lbs/day	-	-	-	Monthly	Grab	-
Arsenic, Total Recoverable 3/	0.69 lbs/day	1.38 lbs/day	-	-	-	Monthly	Grab	-
Chromium Total Recoverable 3/	0.63 lbs/day	1.25 lbs/day	-	-	-	Monthly	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ For the purpose of determining compliance with permit requirements, "Total" and "Total Recoverable" shall be considered equivalent.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN0021 (continued): Treated process wastewater and treated groundwater.

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Copper Total Recoverable 3/	2.29 lbs/day	4.58 lbs/day	-	-	-	Monthly	Grab	-
Acenaphthene	276 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-
Benzo (K) Fluoranthene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-
Benzo (A) Pyrene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-
Chrysene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-
Fluorene	REPORT lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-
Benzo (A) Anthracene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-
2,4-Dimethylphenol	34.56 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ For the purpose of determining compliance with permit requirements, "Total" and "Total Recoverable" shall be considered equivalent.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN0021 (continued): Treated process wastewater and treated groundwater.

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
2,4,6-Trichlorophenol	3.23 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	-
Pentachlorophenol	2.97 lbs/day	3.15 lbs/day	-	-	-	Monthly	Grab	-
Phenols	0.23 lbs/day	0.78 lbs/day	-	-	-	Monthly	Grab	-
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Daily	Totalizer	-
Chemical Oxygen Demand (COD)	192.2 lbs/day	381.5 lbs/day	-	-	-	Monthly	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN002Q: Treated process wastewater and treated groundwater.3/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Toxicity, Ceriodaphnia Acute	-	0 pass(0)/fail(1)	-	-	-	Quarterly	24-Hr Composite	-
Toxicity, Pimephales Acute	-	0 pass(0)/fail(1)	-	-	-	Quarterly	24-Hr Composite	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.C for Effluent Toxicity Limitations and Biomonitoring Requirements

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN003Q: Storm water associated with lumber and wood products industry including wood treating operations using preservatives containing copper, chromium, and arsenic, creosote, and chlorophenolic formulations. 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Arsenic, Total Recoverable 5/	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Chromium Total Recoverable 5/	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Copper Total Recoverable 5/	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Acenaphthylene	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Acenaphthene	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Benzo (K) Fluoranthene	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Benzo (A) Pyrene	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Chrysene	-	-	-	-	REPORT ug/l	Quarterly	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

5/ For the purpose of determining compliance with permit requirements, "Total" and "Total Recoverable" shall be considered equivalent.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN003Q (continued): Storm water associated with lumber and wood products industry including wood treating operations using preservatives containing copper, chromium, and arsenic, creosote, and chlorophenolic formulations. 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
Fluorene	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Phenanthrene	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
2,4-Dimethylphenol	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
2,4,6-Trichlorophenol	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Pentachlorophenol	-	-	-	-	REPORT ug/l	Quarterly	Grab	-
Phenols	-	-	-	-	REPORT ug/l	Quarterly	Grab	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from the following point source(s) outfall(s), described more fully in the permittee's application:

DSN003S: Storm water associated with lumber and wood products industry including wood treating operations using preservatives containing copper, chromium, and arsenic, creosote, and chlorophenolic formulations. 3/ 4/

Such discharge shall be limited and monitored by the permittee as specified below:

	DISCHARGE LIMITATIONS					MONITORING REQUIREMENTS 1/		
EFFLUENT CHARACTERISTIC	Monthly Average	Daily Maximum	Daily Minimum	Monthly Average	Daily Maximum	Measurement Frequency 2/	Sample Type	Seasonal
BOD, 5-Day (20 Deg. C)	-	-	-	REPORT mg/l	REPORT mg/l	Twice per Year	Grab	-
pH	-	-	REPORT S.U.	-	REPORT S.U.	Twice per Year	Grab	-
Solids, Total Suspended	-	-	-	REPORT mg/l	REPORT mg/l	Twice per Year	Grab	-
Oil and Grease	-	-	-	REPORT mg/l	15 mg/l	Twice per Year	Grab	-
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD				Twice per Year	Measured	-

THE DISCHARGE SHALL HAVE NO SHEEN, AND THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

B. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge and shall be in accordance with the provisions of this permit.

2. Test Procedures

For the purpose of reporting and compliance, permittees shall use one of the following procedures:

a. For parameters with an EPA established Minimum Level (ML), report the measured value if the analytical result is at or above the ML and report "0" for values below the ML. Test procedures for the analysis of pollutants shall conform to 40 CFR Part 136 and guidelines published pursuant to Section 304(h) of the FWPCA, 33 U.S.C. Section 1314(h). If more than one method for analysis of a substance is approved for use, a method having a minimum level lower than the permit limit shall be used. If the minimum level of all methods is higher than the permit limit, the method having the lowest minimum level shall be used and a report of less than the minimum level shall be reported as zero and will constitute compliance; however, should EPA approve a method with a lower minimum level during the term of this permit the permittee shall use the newly approved method.

b. For pollutants parameters without an established ML, an interim ML may be utilized. The interim ML shall be calculated as 3.18 times the Method Detection Level (MDL) calculated pursuant to 40 CFR Part 136, Appendix B.

Permittees may develop an effluent matrix-specific ML, where an effluent matrix prevents attainment of the established ML. However, a matrix specific ML shall be based upon proper laboratory method and technique. Matrix-specific MLs must be approved by the Department, and may be developed by the permittee during permit issuance, reissuance, modification, or during compliance schedule.

In either case the measured value should be reported if the analytical result is at or above the ML and "0" reported for values below the ML.

c. For parameters without an EPA established ML, interim ML, or matrix-specific ML, a report of less than the detection limit shall constitute compliance if the detection limit of all analytical methods is higher than the permit limit using the most sensitive EPA approved method. For the purpose of calculating a monthly average, "0" shall be used for values reported less than the detection limit.

The Minimum Level utilized for procedures A and B above shall be reported on the permittee's DMR. When an EPA approved test procedure for analysis of a pollutant does not exist, the Director shall approve the procedure to be used.

3. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The facility name and location, point source number, date, time and exact place of sampling;

b. The name(s) of person(s) who obtained the samples or measurements;

c. The dates and times the analyses were performed;

d. The name(s) of the person(s) who performed the analyses;

e. The analytical techniques or methods used, including source of method and method number; and

f. The results of all required analyses.

4. Records Retention and Production

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the above reports or the application for this permit, for a period of at least three years from the date of the sample measurement, report or application. This period may be extended by request of the Director at any time. If litigation or other enforcement action, under the AWPCA and/or the FWPCA, is ongoing which involves any of the above records, the records shall be kept until the litigation is resolved. Upon the written request of the Director or his designee, the permittee shall provide the Director with a copy of any record required to be retained by this paragraph. Copies of these records shall not be submitted unless requested.

All records required to be kept for a period of three years shall be kept at the permitted facility or an alternate location approved by the Department in writing and shall be available for inspection.

5. Monitoring Equipment and Instrumentation

All equipment and instrumentation used to determine compliance with the requirements of this permit shall be installed, maintained, and calibrated in accordance with the manufacturer's instructions or, in the absence of manufacturer's instructions, in accordance with accepted practices. The permittee shall develop and maintain quality assurance procedures to ensure proper operation and maintenance of all equipment and instrumentation. The quality assurance procedures shall include the proper use, maintenance, and installation, when appropriate, of monitoring equipment at the plant site.

C. DISCHARGE REPORTING REQUIREMENTS

1. Reporting of Monitoring Requirements

a. The permittee shall conduct the required monitoring in accordance with the following schedule:

MONITORING REQUIRED MORE FREQUENTLY THAN MONTHLY AND MONTHLY shall be conducted during the first full month following the effective date of coverage under this permit and every month thereafter.

QUARTERLY MONITORING shall be conducted at least once during each calendar quarter. Calendar quarters are the periods of January through March, April through June, July through September, and October through December. The permittee shall conduct the quarterly monitoring during the first complete calendar quarter following the effective date of this permit and is then required to monitor once during each quarter thereafter. Quarterly monitoring may be done anytime during the quarter, unless restricted elsewhere in this permit, but it should be submitted with the last DMR due for the quarter, i.e., (March, June, September and December DMR's).

SEMIANNUAL MONITORING shall be conducted at least once during the period of January through June and at least once during the period of July through December. The permittee shall conduct the semiannual monitoring during the first complete calendar semiannual period following the effective date of this permit and is then required to monitor once during each semiannual period thereafter. Semiannual monitoring may be done anytime during the semiannual period, unless restricted elsewhere in this permit, but it should be submitted with the last DMR for the month of the semiannual period, i.e. (June and December DMR's).

ANNUAL MONITORING shall be conducted at least once during the period of January through December. The permittee shall conduct the annual monitoring during the first complete calendar annual period following the effective date of this permit and is then required to monitor once during each annual period thereafter. Annual monitoring may be done anytime during the year, unless restricted elsewhere in this permit, but it should be submitted with the December DMR.

b. The permittee shall submit discharge monitoring reports (DMRs) on the forms provided by the Department and in accordance with the following schedule:

REPORTS OF MORE FREQUENTLY THAN MONTHLY AND MONTHLY TESTING shall be submitted on a **monthly** basis. The first report is due on the **28th day of (MONTH, YEAR).** The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

REPORTS OF QUARTERLY TESTING shall be submitted on a **quarterly** basis. The first report is due on the **28th day of [Month, Year].** The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

REPORTS OF SEMIANNUAL TESTING shall be submitted on a semiannual basis. The reports are due on the 28th day of JANUARY and the 28th day of JULY. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

REPORTS OF ANNUAL TESTING shall be submitted on an annual basis. The first report is due on the 28th day of JANUARY. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

c. Except as allowed by Provision I.C.1.c.(1) or (2), the permittee shall submit all Discharge Monitoring Reports (DMRs) required by Provision I.C.1.b electronically

(1) If the permittee is unable to complete the electronic submittal of DMR data due to technical problems originating with the Department's electronic system (this could include entry/submittal issues with an entire set of DMRs or individual parameters), the permittee is not relieved of their obligation to submit DMR data to the Department by the date specified in Provision I.C.1.b, unless otherwise directed by the Department.

If the Department's electronic system is down on the 28th day of the month in which the DMR is due or is down for an extended period of time, as determined by the Department, when a DMR is required to be submitted, the permittee may submit the data in an alternate manner and format acceptable to the Department. Preapproved alternate acceptable methods include faxing, e-mailing, mailing, or hand-delivery of data such that they are received by the required reporting date. Within five calendar days of the Department's electronic system resuming operation, the permittee shall enter the data into the Department's electronic system, unless an alternate timeframe is approved by the Department. A comment should be included on the electronic DMR submittal verifying the original submittal date (date of the fax, copy of dated e-mail, or hand-delivery stamped date), if applicable.

(2) The permittee may submit a request to the Department for a temporary electronic reporting waiver for DMR submittals. The waiver request should include the permit number; permittee name; facility/site name; facility address; name, address, and contact information for the responsible official or duly authorized representative; a detailed statement regarding the basis for requesting such a waiver; and the duration for which the waiver is requested. Approved electronic reporting waivers are not transferrable.

A permittee with an approved electronic reporting waiver for DMRs may submit hard copy DMRs for the period that the approved electronic reporting waiver request is effective. The permittee shall submit the Department-approved DMR forms to the address listed in Provision I.C.1.e.

(3) If a permittee is allowed to submit a hard copy DMR, the DMR must be legible and bear an original signature. Photo and electronic copies of the signature are not acceptable and shall not satisfy the reporting requirements of this permit.

(4) If the permittee, using approved analytical methods as specified in Provision I.B.2, monitors any discharge from a point source for a limited substance identified in Provision I.A. of this permit more frequently than required by this permit, the results of such monitoring shall be included in the calculation and reporting of values on the DMR and the increased frequency shall be indicated on the DMR.

(5) In the event no discharge from a point source identified in Provision I.A. of this permit and described more fully in the permittee's application occurs during a monitoring period, the permittee shall report "No Discharge" for such period on the appropriate DMR.

d. All reports and forms required to be submitted by this permit, the AWPCA and the Department's Rules, shall be electronically signed (or, if allowed by the Department, traditionally signed) by a "responsible official" of the permittee as defined in ADEM Administrative Code Rule 335-6-6-.09 or a "duly authorized representative" of such official as defined in ADEM Administrative Code Rule 335-6-6-.09 and shall bear the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

e. Discharge Monitoring Reports required by this permit, the AWPCA, and the Department's Rules that are being submitted in hard copy shall be addressed to:

Alabama Department of Environmental Management
Permits and Services Division
Environmental Data Section
Post Office Box 301463
Montgomery, Alabama 36130-1463

Certified and Registered Mail containing Discharge Monitoring Reports shall be addressed to:

Alabama Department of Environmental Management
Permits and Services Division
Environmental Data Section
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2400

f. All other correspondence and reports required to be submitted by this permit, the AWPCA, and the Department's Rules shall be addressed to:

Alabama Department of Environmental Management
Water Division

Water Division
Post Office Box 301463
Montgomery, Alabama 36130-1463

Certified and Registered Mail shall be addressed to:

Alabama Department of Environmental Management
Water Division
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2400

g. If this permit is a re-issuance, then the permittee shall continue to submit DMRs in accordance with the requirements of their previous permit until such time as DMRs are due as discussed in Part I.C.1.b above.

2. Noncompliance Notification

a. 24-Hour Noncompliance Reporting

The permittee shall report to the Director, within 24-hours of becoming aware of the noncompliance, any noncompliance which may endanger health or the environment. This shall include but is not limited to the following circumstances:

(1) does not comply with any daily minimum or maximum discharge limitation for an effluent characteristic specified in Provision I. A. of this permit which is denoted by an "(X)";

(2) threatens human health or welfare, fish or aquatic life, or water quality standards;

(3) does not comply with an applicable toxic pollutant effluent standard or prohibition established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a);

(4) contains a quantity of a hazardous substance which has been determined may be harmful to public health or welfare under Section 311(b)(4) of the FWPCA, 33 U.S.C. Section 1321(b)(4);

(5) exceeds any discharge limitation for an effluent characteristic as a result of an unanticipated bypass or upset; and

(6) is an unpermitted direct or indirect discharge of a pollutant to a water of the state (unpermitted discharges properly reported to the Department under any other requirement are not required to be reported under this provision).

The permittee shall orally report the occurrence and circumstances of such discharge to the Director within 24-hours after the permittee becomes aware of the occurrence of such discharge. In addition to the oral report, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c no later than five (5) days after becoming aware of the occurrence of such discharge.

b. If for any reason, the permittee's discharge does not comply with any limitation of this permit, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c below, such report shall be submitted with the next Discharge Monitoring Report required to be submitted by Part I.C.1 of this permit after becoming aware of the occurrence of such noncompliance.

c. Any written report required to be submitted to the Director or Designee by Part I.C.2 a. or b. shall be submitted using a Noncompliance Notification Form (ADEM Form 421) available on the Department's website (http://adem.alabama.gov/DeptForms/Form421.pdf) and include the following information:

(1) A description of the discharge and cause of noncompliance;

(2) The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and

(3) A description of the steps taken and/or being taken to reduce or eliminate the noncomplying discharge and to prevent its recurrence.

D. OTHER REPORTING AND NOTIFICATION REQUIREMENTS

1. Anticipated Noncompliance

The permittee shall give the Director written advance notice of any planned changes or other circumstances regarding a facility which may result in noncompliance with permit requirements.

2. Termination of Discharge

The permittee shall notify the Director, in writing, when all discharges from any point source(s) identified in Provision I. A. of this permit have permanently ceased. This notification shall serve as sufficient cause for instituting procedures for modification or termination of the permit.

3. Updating Information

a. The permittee shall inform the Director of any change in the permittee's mailing address, telephone number or in the permittee's designation of a facility contact or office having the authority and responsibility to prevent and abate violations of the AWPCA, the Department's Rules, and the terms and conditions of this permit, in writing, no later than ten (10) days after such change. Upon request of the Director or his designee, the permittee shall furnish the Director with an update of any information provided in the permit application.

b. If the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information with a written explanation for the mistake and/or omission.

4. Duty to Provide Information

The permittee shall furnish to the Director, within a reasonable time, any information which the Director or his designee may request to determine whether cause exists for modifying, revoking and re-issuing, suspending, or terminating this permit, in whole or in part, or to determine compliance with this permit.

5. Cooling Water and Boiler Water Additives

a. The permittee shall notify the Director in writing not later than thirty (30) days prior to instituting the use of any biocide corrosion inhibitor or chemical additive in a cooling or boiler system, not identified in the application for this permit, from which discharge is allowed by this permit. Notification is not required for additives that do not contain a heavy metal(s) as an active ingredient and that pass through a wastewater treatment system prior to discharge nor is notification required for additives that should not reasonably be expected to cause the cooling water or boiler water to exhibit toxicity as determined by analysis of manufacturer's data or testing by the permittee. Such notification shall include:

(1) name and general composition of biocide or chemical;

(2) 96-hour median tolerance limit data for organisms representative of the biota of the waterway into which the discharge will ultimately reach;

(2) quantities to be used;

(3) frequencies of use;

(4) proposed discharge concentrations; and

(6) EPA registration number, if applicable.

b. The use of a biocide or additive containing tributyl tin, tributyl tin oxide, zinc, chromium or related compounds in cooling or boiler system(s), from which a discharge regulated by this permit occurs, is prohibited except as exempted below. The use of a biocide or additive containing zinc, chromium or related compounds may be used in special circumstances if (1) the permit contains limits for these substances, or (2) the applicant demonstrates during the application process that the use of zinc, chromium or related compounds as a biocide or additive will not pose a reasonable potential to violate the applicable State water quality standards for these substances. The use of any additive, not identified in this permit or in the application for this permit or not exempted from notification under this permit is prohibited, prior to a determination by the Department that permit modification to control discharge of the additive is not required or prior to issuance of a permit modification controlling discharge of the additive.

6. Permit Issued Based On Estimated Characteristics

a. If this permit was issued based on estimates of the characteristics of a process discharge reported on an EPA NPDES Application Form 2D (EPA Form 3510-2D), the permittee shall complete and submit an EPA NPDES Application Form 2C (EPA Form 3510-2C) no later than two years after the date that discharge begins. Sampling required for completion of the Form 2C shall occur when a discharge(s) from the process(s) causing the new or increased discharge is occurring. If this permit was issued based on estimates concerning the composition of a stormwater discharge(s), the permittee shall perform the sampling required by EPA NPDES Application Form 2F (EPA Form 3510-2F) no later than one year after the industrial activity generating the stormwater discharge has been fully initiated.

b. This permit shall be reopened if required to address any new information resulting from the completion and submittal of the Form 2C and or 2F.

E. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the discharge limitations specified in Provision I. A. in accordance with the following schedule:

COMPLIANCE SHALL BE ATTAINED ON THE EFFECTIVE DATE OF THIS PERMIT

2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

PART II OTHER REQUIREMENTS, RESPONSIBILITIES, AND DUTIES

A. OPERATIONAL AND MANAGEMENT REQUIREMENTS

1. Facilities Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities only when necessary to achieve compliance with the conditions of the permit.

2. Best Management Practices

a. Dilution water shall not be added to achieve compliance with discharge limitations except when the Director or his designee has granted prior written authorization for dilution to meet water quality requirements.

b. The permittee shall prepare, implement, and maintain a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 C.F.R. Section 112 if required thereby.

c. The permittee shall prepare, submit for approval and implement a Best Management Practices (BMP) Plan for containment of any or all process liquids or solids, in a manner such that these materials do not present a significant potential for discharge, if so required by the Director or his designee. When submitted and approved, the BMP Plan shall become a part of this permit and all requirements of the BMP Plan shall become requirements of this permit.

3. Spill Prevention, Control, and Management

The permittee shall provide spill prevention, control, and/or management sufficient to prevent any spills of pollutants from entering a water of the state or a publicly or privately owned treatment works. Any containment system used to implement this requirement shall be constructed of materials compatible with the substance(s) contained and which shall prevent the contamination of groundwater and such containment system shall be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided.

B. OTHER RESPONSIBILITIES

1. Duty to Mitigate Adverse Impacts

The permittee shall promptly take all reasonable steps to mitigate and minimize or prevent any adverse impact on human health or the environment resulting from noncompliance with any discharge limitation specified in Provision I. A. of this permit, including such accelerated or additional monitoring of the discharge and/or the receiving waterbody as necessary to determine the nature and impact of the noncomplying discharge.

2. Right of Entry and Inspection

The permittee shall allow the Director, or an authorized representative, upon the presentation of proper credentials and other documents as may be required by law to:

a. enter upon the permittee's premises where a regulated facility or activity or point source is located or conducted, or where records must be kept under the conditions of the permit;

b. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and

d. sample or monitor, for the purposes of assuring permit compliance or as otherwise authorized by the AWPCA, any substances or parameters at any location.

C. BYPASS AND UPSET

1. Bypass

a. Any bypass is prohibited except as provided in b. and c. below:

b. A bypass is not prohibited if:

(1) It does not cause any discharge limitation specified in Provision I. A. of this permit to be exceeded;

(2) It enters the same receiving stream as the permitted outfall; and

(3) It is necessary for essential maintenance of a treatment or control facility or system to assure efficient operation of such facility or system.

c. A bypass is not prohibited and need not meet the discharge limitations specified in Provision I. A. of this permit if:

(1) It is unavoidable to prevent loss of life, personal injury, or severe property damage;

(2) There are no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and

(3) The permittee submits a written request for authorization to bypass to the Director at least ten (10) days prior to the anticipated bypass (if possible), the permittee is granted such authorization, and the permittee complies with any conditions imposed by the Director to minimize any adverse impact on human health or the environment resulting from the bypass.

d. The permittee has the burden of establishing that each of the conditions of Provision II.C.1.b. or c. have been met to qualify for an exception to the general prohibition against bypassing contained in a. and an exemption, where applicable, from the discharge limitations specified in Provision I. A. of this permit.

2. Upset

a. A discharge which results from an upset need not meet the discharge limitations specified in Provision I. A. of this permit if:

(1) No later than 24-hours after becoming aware of the occurrence of the upset, the permittee orally reports the occurrence and circumstances of the upset to the Director or his designee; and

(2) No later than five (5) days after becoming aware of the occurrence of the upset, the permittee furnishes the Director with evidence, including properly signed, contemporaneous operating logs, or other relevant evidence, demonstrating that (i) an upset occurred; (ii) the permittee can identify the specific cause(s) of the upset; (iii) the permittee's facility was being properly operated at the time of the upset; and (iv) the permittee promptly took all reasonable steps to minimize any adverse impact on human health or the environment resulting from the upset.

b. The permittee has the burden of establishing that each of the conditions of Provision II. C.2.a. of this permit have been met to qualify for an exemption from the discharge limitations specified in Provision I.A. of this permit.

D. DUTY TO COMPLY WITH PERMIT, RULES, AND STATUTES

1. Duty to Comply

a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the AWPCA and the FWPCA and is grounds for enforcement action, for permit termination, revocation and reissuance, suspension, modification; or denial of a permit renewal application.

b. The necessity to halt or reduce production or other activities in order to maintain compliance with the conditions of the permit shall not be a defense for a permittee in an enforcement action.

c. The discharge of a pollutant from a source not specifically identified in the permit application for this permit and not specifically included in the description of an outfall in this permit is not authorized and shall constitute noncompliance with this permit.

d. The permittee shall take all reasonable steps, including cessation of production or other activities, to minimize or prevent any violation of this permit or to minimize or prevent any adverse impact of any permit violation.

e. Nothing in this permit shall be construed to preclude and negate the permittee's responsibility or liability to apply for, obtain, or comply with other ADEM, Federal, State, or Local Government permits, certifications, licenses, or other approvals.

2. Removed Substances

Solids, sludges, filter backwash, or any other pollutant or other waste removed in the course of treatment or control of wastewaters shall be disposed of in a manner that complies with all applicable Department Rules.

3. Loss or Failure of Treatment Facilities

Upon the loss or failure of any treatment facilities, including but not limited to the loss or failure of the primary source of power of the treatment facility, the permittee shall, where necessary to maintain compliance with the discharge limitations specified in Provision I. A. of this permit, or any other terms or conditions of this permit, cease, reduce, or otherwise control production and/or all discharges until treatment is restored. If control of discharge during loss or failure of the primary source of power is to be accomplished by means of alternate power sources, standby generators, or retention of inadequately treated effluent, the permittee must furnish to the Director within six months a certification that such control mechanisms have been installed.

4. Compliance with Statutes and Rules

a. This permit has been issued under ADEM Administrative Code, Chapter 335-6-6. All provisions of this chapter, that are applicable to this permit, are hereby made a part of this permit. A copy of this chapter may be obtained for a small charge from the Office of General Counsel, Alabama Department of Environmental Management, 1400 Coliseum Blvd., Montgomery, AL 36130.

b. This permit does not authorize the noncompliance with or violation of any Laws of the State of Alabama or the United States of America or any regulations or rules implementing such laws. FWPCA, 33 U.S.C. Section 1319, and Code of Alabama 1975, Section 22-22-14.

E. PERMIT TRANSFER, MODIFICATION, SUSPENSION, REVOCATION, AND REISSUANCE

1. Duty to Reapply or Notify of Intent to Cease Discharge

a. If the permittee intends to continue to discharge beyond the expiration date of this permit, the permittee shall file a complete permit application for reissuance of this permit at least 180 days prior to its expiration. If the permittee does not intend to continue discharge beyond the expiration of this permit, the permittee shall submit written notification of this intent which shall be signed by an individual meeting the signatory requirements for a permit application as set forth in ADEM Administrative Code Rule 335-6-6-.09.

b. Failure of the permittee to apply for reissuance at least 180 days prior to permit expiration will void the automatic continuation of the expiring permit provided by ADEM Administrative Code Rule 335-6-6-.06 and should the permit not be reissued for any reason any discharge after expiration of this permit will be an unpermitted discharge.

2. Change in Discharge

a. The permittee shall apply for a permit modification at least 180 days in advance of any facility expansion, production increase, process change, or other action that could result in the discharge of additional pollutants or increase the quantity of a discharged pollutant such that existing permit limitations would be exceeded or that could result in an additional discharge point. This requirement applies to pollutants that are or that are not subject to discharge limitations in this permit. No new or increased discharge may begin until the Director has authorized it by issuance of a permit modification or a reissued permit.

b. The permittee shall notify the Director as soon as it is known or there is reason to believe:

(1) That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:

(a) one hundred micrograms per liter;

(b) two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4,6-dini-trophenol; and one milligram per liter for antimony;

(c) five times the maximum concentration value reported for that pollutant in the permit application; or

(2) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

(a) five hundred micrograms per liter;

(b) one milligram per liter for antimony;

(c) ten times the maximum concentration value reported for that pollutant in the permit application.

3. Transfer of Permit

This permit may not be transferred or the name of the permittee changed without notice to the Director and subsequent modification or revocation and reissuance of the permit to identify the new permittee and to incorporate any other changes as may be required under the FWPCA or AWPCA. In the case of a change in name, ownership or control of the permittee's premises only, a request for permit modification in a format acceptable to the Director is required at least 30 days prior to the change. In the case of a change in name, ownership or control of the permittee's premises accompanied by a change or proposed change in effluent characteristics, a complete permit application is required to be submitted to the Director at least 180 days prior to the change. Whenever the Director is notified of a change in name, ownership or control, he may decide not to modify the existing permit and require the submission of a new permit application.

4. Permit Modification and Revocation

a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:

(1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;

(2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or

(3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.

b. This permit may be modified during its term for cause, including but not limited to, the following:

(1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;

(2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;

(3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;

(4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;

(5) Errors in calculation of discharge limitations or typographical or clerical errors were made;

(6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;

(7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;

(8) To agree with a granted variance under 301(c), 301(g), 301(h), 301(k), or 316(a) of the FWPCA or for fundamentally different factors;

(9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;

(10) When required by the reopener conditions in this permit;

(11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);

(12) Upon failure of the state to notify, as required by Section 402(b)(3) of the FWPCA, another state whose waters may be affected by a discharge permitted by this permit;

(13) When required to correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions; or

(14) When requested by the permittee and the Director determines that the modification has cause and will not result in a violation of federal or state law, regulations or rules.

5. Permit Termination

This permit may be terminated during its term for cause, including but not limited to, the following:

a. Violation of any term or condition of this permit;

b. The permittee's misrepresentation or failure to disclose fully all relevant facts in the permit application or during the permit issuance process or the permittee's misrepresentation of any relevant facts at any time;

c. Materially false or inaccurate statements or information in the permit application or the permit;

d. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge;

e. The permittee's discharge threatens human life or welfare or the maintenance of water quality standards;

f. Permanent closure of the facility generating the wastewater permitted to be discharged by this permit or permanent cessation of wastewater discharge;

g. New or revised requirements of any applicable standard or limitation that is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA that the Director determines cannot be complied with by the permittee; or

h. Any other cause allowed by the ADEM Administrative Code, Chapter 335-6-6.

6. Permit Suspension

This permit may be suspended during its term for noncompliance until the permittee has taken action(s) necessary to achieve compliance.

7. Request for Permit Action Does Not Stay Any Permit Requirement

The filing of a request by the permittee for modification, suspension or revocation of this permit, in whole or in part, does not stay any permit term or condition.

F. COMPLIANCE WITH TOXIC POLLUTANT STANDARD OR PROHIBITION

If any applicable effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a), for a toxic pollutant discharged by the permittee and such standard or prohibition is more stringent than any discharge limitation on the pollutant specified in Provision I. A. of this permit, or controls a pollutant not limited in Provision I. A. of this permit, this permit shall be modified to conform to the toxic pollutant effluent standard or prohibition and the permittee shall be notified of such modification. If this permit has not been modified to conform to the toxic pollutant effluent standard or prohibition before the effective date of such standard or prohibition, the permittee shall attain compliance with the requirements of the standard or prohibition within the time period required by the standard or prohibition and shall continue to comply with the standard or prohibition until this permit is modified or reissued.

G. DISCHARGE OF WASTEWATER GENERATED BY OTHERS

The discharge of wastewater, generated by any process, facility, or by any other means not under the operational control of the permittee or not identified in the application for this permit or not identified specifically in the description of an outfall in this permit is not authorized by this permit.

PART III OTHER PERMIT CONDITIONS

A. CIVIL AND CRIMINAL LIABILITY

1. Tampering

Any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained or performed under the permit shall, upon conviction, be subject to penalties as provided by the AWPCA.

2. False Statements

Any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be subject to penalties as provided by the AWPCA.

3. Permit Enforcement

a. Any NPDES permit issued or reissued by the Department is a permit for the purpose of the AWPCA and the FWPCA and as such any terms, conditions, or limitations of the permit are enforceable under state and federal law.

b. Any person required to have a NPDES permit pursuant to ADEM Administrative Code Chapter 335-6-6 and who discharges pollutants without said permit, who violates the conditions of said permit, who discharges pollutants in a manner not authorized by the permit, or who violates applicable orders of the Department or any applicable rule or standard of the Department, is subject to any one or combination of the following enforcement actions under applicable state statutes.

(1) An administrative order requiring abatement, compliance, mitigation, cessation, clean-up, and/or penalties;

(2) An action for damages;

(3) An action for injunctive relief; or

(4) An action for penalties.

c. If the permittee is not in compliance with the conditions of an expiring or expired permit the Director may choose to do any or all of the following provided the permittee has made a timely and complete application for reissuance of the permit:

(1) initiate enforcement action based upon the permit which has been continued;

(2) issue a notice of intent to deny the permit reissuance. If the permit is denied, the owner or operator would then be required to cease the activities authorized by the continued permit or be subject to enforcement action for operating without a permit;

(3) reissue the new permit with appropriate conditions; or

(4) take other actions authorized by these rules and AWPCA.

4. Relief from Liability

Except as provided in Provision II.C.1 (Bypass) and Provision II.C.2 (Upset), nothing in this permit shall be construed to relieve the permittee of civil or criminal liability under the AWPCA or FWPCA for noncompliance with any term or condition of this permit.

B. OIL AND HAZARDOUS SUBSTANCE LIABILITY

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties to which the permittee is or may be subject under Section 311 of the FWPCA, 33 U.S.C. Section 1321.

C. PROPERTY AND OTHER RIGHTS

This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to persons or property or invasion of other private rights, trespass, or any infringement of federal, state, or local laws or regulations, nor does it authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any waters of the state or of the United States.

D. AVAILABILITY OF REPORTS

Except for data determined to be confidential under Code of Alabama 1975, Section 22-22-9(c), all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Department. Effluent data shall not be considered confidential.

E. EXPIRATION OF PERMITS FOR NEW OR INCREASED DISCHARGES

1. If this permit was issued for a new discharger or new source, this permit shall expire eighteen months after the issuance date if construction of the facility has not begun during the eighteen-month period.

2. If this permit was issued or modified to allow the discharge of increased quantities of pollutants to accommodate the modification of an existing facility and if construction of this modification has not begun during the eighteen month period after issuance of this permit or permit modification, this permit shall be modified to reduce the quantities of pollutants allowed to be discharged to those levels that would have been allowed if the modification of the facility had not been planned.

3. Construction has begun when the owner or operator has:

   a. begun, or caused to begin as part of a continuous on-site construction program:

      (1) any placement, assembly, or installation of facilities or equipment; or

      (2) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or

   b. entered into a binding contractual obligation for the purpose of placement, assembly, or installation of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under the paragraph. The entering into a lease with the State of Alabama for exploration and production of hydrocarbons shall also be considered beginning construction.

F. COMPLIANCE WITH WATER QUALITY STANDARDS

1. On the basis of the permittee's application, plans, or other available information, the Department has determined that compliance with the terms and conditions of this permit should assure compliance with the applicable water quality standards.

2. Compliance with permit terms and conditions notwithstanding, if the permittee's discharge(s) from point sources identified in Provision I. A. of this permit cause or contribute to a condition in contravention of state water quality standards, the Department may require abatement action to be taken by the permittee in emergency situations or modify the permit pursuant to the Department's Rules, or both.

3. If the Department determines, on the basis of a notice provided pursuant to this permit or any investigation, inspection or sampling, that a modification of this permit is necessary to assure maintenance of water quality standards or compliance with other provisions of the AWPCA or FWPCA, the Department may require such modification and, in cases of emergency, the Director may prohibit the discharge until the permit has been modified.

G. GROUNDWATER

Unless specifically authorized under this permit, this permit does not authorize the discharge of pollutants to groundwater. Should a threat of groundwater contamination occur, the Director may require groundwater monitoring to properly assess the degree of the problem and the Director may require that the Permittee undertake measures to abate any such discharge and/or contamination.

H. DEFINITIONS

1. Average monthly discharge limitation - means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).

2. Average weekly discharge limitation - means the highest allowable average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).

3. Arithmetic Mean – means the summation of the individual values of any set of values divided by the number of individual values.

4. AWPCA - means the Alabama Water Pollution Control Act.

5. BOD – means the five-day measure of the pollutant parameter biochemical oxygen demand.

6. Bypass - means the intentional diversion of waste streams from any portion of a treatment facility.

7. CBOD – means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.

8. Daily discharge - means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.

9. Daily maximum - means the highest value of any individual sample result obtained during a day.

10. Daily minimum - means the lowest value of any individual sample result obtained during a day.

11. Day - means any consecutive 24-hour period.

12. Department - means the Alabama Department of Environmental Management.

13. Director - means the Director of the Department.

14. Discharge - means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other wastes into waters of the state". Code of Alabama 1975, Section 22-22-1(b)(8).

15. Discharge Monitoring Report (DMR) - means the form approved by the Director to accomplish reporting requirements of an NPDES permit.

16. DO – means dissolved oxygen.

17. 8HC – means 8-hour composite sample, including any of the following:

    a. The mixing of at least 5 equal volume samples collected at constant time intervals of not more than 2 hours over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.

    b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.

18. EPA - means the United States Environmental Protection Agency.

19. FC – means the pollutant parameter fecal coliform.

20. Flow – means the total volume of discharge in a 24-hour period.

21. FWPCA - means the Federal Water Pollution Control Act.

22. Geometric Mean – means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).

23. Grab Sample – means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.

24. Indirect Discharger – means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.

25. Industrial User – means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category "Division D – Manufacturing" and such other classes of significant waste producers as, by regulation, the Director deems appropriate.

26. MGD – means million gallons per day.

27. Monthly Average – means, other than for fecal coliform bacteria, the arithmetic mean of the entire composite or grab samples taken for the daily discharges collected in one month period. The monthly average for fecal coliform bacteria is the geometric mean of daily discharge samples collected in a one month period. The monthly average for flow is the arithmetic mean of all flow measurements taken in a one month period.

28. New Discharger – means a person, owning or operating any building, structure, facility or installation:

    a. from which there is or may be a discharge of pollutants;

    b. that did not commence the discharge of pollutants prior to August 13, 1979, and which is not a new source; and

    c. which has never received a final effective NPDES permit for dischargers at that site.

29. NH3-N – means the pollutant parameter ammonia, measured as nitrogen.

30. Permit application - means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.

31. Point source - means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, . . . from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. Section 1362(14).

32. Pollutant - includes for purposes of this permit, but is not limited to, those pollutants specified in Code of Alabama 1975, Section 22-22-1(b)(3) and those effluent characteristics specified in Provision I. A. of this permit.

33. Privately Owned Treatment Works – means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a "POTW".

34. Publicly Owned Treatment Works – means a wastewater collection and treatment facility owned by the State, municipality, regional entity composed of two or more municipalities, or another entity created by the State or local authority for the purpose of collecting and treating municipal wastewater.

35. Receiving Stream – means the "waters" receiving a "discharge" from a "point source".

36. Severe property damage - means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

37. Significant Source – means a source which discharges 0.025 MGD or more to a POTW or greater than five percent of the treatment work's capacity, or a source which is a primary industry as defined by the U.S. EPA or which discharges a priority or toxic pollutant.

38. Solvent – means any virgin, used or spent organic solvent(s) identified in the F-Listed wastes (F001 through F005) specified in 40 CFR 261.31 that is used for the purpose of solubilizing other materials.

39. TKN – means the pollutant parameter Total Kjeldahl Nitrogen.

40. TON – means the pollutant parameter Total Organic Nitrogen.

41. TRC – means Total Residual Chlorine.

42. TSS – means the pollutant parameter Total Suspended Solids.

43. 24HC – means 24-hour composite sample, including any of the following:

    a. the mixing of at least 12 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;

    b. a sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected; or

    c. a sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.

44. Upset - means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

45. Waters - means "[a]ll waters of any river, stream, watercourse, pond, lake, coastal, ground or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely upon the property of a single individual, partnership or corporation unless such waters are used in interstate commerce." Code of Alabama 1975, Section 22-22-1(b)(2). Waters "include all navigable waters" as defined in Section 502(7) of the FWPCA, 22 U.S.C. Section 1362(7), which are within the State of Alabama.

46. Week - means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.

47. Weekly (7-day and calendar week) Average – is the arithmetic mean of all samples collected during a consecutive 7-day period or calendar week, whichever is applicable. The calendar week is defined as beginning on Sunday and ending on Saturday. Weekly averages shall be calculated for all calendar weeks with Saturdays in the month. If a calendar week overlaps two months (i.e., the Sunday is in one month and the Saturday in the following month), the weekly average calculated for the calendar week shall be included in the data for the month that contains the Saturday.

I. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART IV ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS

A. BEST MANAGEMENT PRACTICES (BMP) PLAN REQUIREMENTS

1. BMP Plan

The permittee shall develop and implement a Best Management Practices (BMP) Plan which prevents, or minimizes the potential for, the release of pollutants from ancillary activities, including material storage areas; plant site runoff; in-plant transfer, process and material handling areas; loading and unloading operations, and sludge and waste disposal areas, to the waters of the State through plant site runoff; spillage or leaks; sludge or waste disposal; or drainage from raw material storage.

2. Plan Content

The permittee shall prepare and implement a best management practices (BMP) plan, which shall:

a. Establish specific objectives for the control of pollutants:

(1) Each facility component or system shall be examined for its potential for causing a release of significant amounts of pollutants to waters of the State due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.

(2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g. precipitation), or circumstances to result in significant amounts of pollutants reaching surface waters, the plan should include a prediction of the direction, rate of flow, and total quantity of pollutants which could be discharged from the facility as a result of each condition or circumstance.

b. Establish specific best management practices to meet the objectives identified under paragraph a. of this section, addressing each component or system capable of causing a release of significant amounts of pollutants to the waters of the State, and identifying specific preventative or remedial measures to be implemented;

c. Establish a program to identify and repair leaking equipment items and damaged containment structures, which may contribute to contaminated stormwater runoff. This program must include regular visual inspections of equipment, containment structures and of the facility in general to ensure that the BMP is continually implemented and effective;

d. Prevent the spillage or loss of fluids, oil, grease, gasoline, etc. from vehicle and equipment maintenance activities and thereby prevent the contamination of stormwater from these substances;

e. Prevent or minimize stormwater contact with material stored on site;

f. Designate by position or name the person or persons responsible for the day to day implementation of the BMP;

g. Provide for routine inspections, on days during which the facility is manned, of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general to ensure that the BMP is continually implemented and effective;

h. Provide for the use and disposal of any material used to absorb spilled fluids that could contaminate stormwater;

i. Develop a solvent management plan, if solvents are used on site. The solvent management plan shall include as a minimum lists of the solvents on site; the disposal method of solvents used instead of dumping, such as reclamation, contract hauling; and the procedures for assuring that solvents do not routinely spill or leak into the stormwater;

j. Provide for the disposal of all used oils, hydraulic fluids, solvent degreasing material, etc. in accordance with good management practices and any applicable state or federal regulations;

k. Include a diagram of the facility showing the locations where stormwater exits the facility, the locations of any structure or other mechanisms intended to prevent pollution of stormwater or to remove pollutants from stormwater, the locations of any collection and handling systems;

l. Provide control sufficient to prevent or control pollution of stormwater by soil particles to the degree required to maintain compliance with the water quality standard for turbidity applicable to the waterbody(s) receiving discharge(s) under this permit;

m. Provide spill prevention, control, and/or management sufficient to prevent or minimize contaminated stormwater runoff. Any containment system used to implement this requirement shall be constructed of materials compatible with the substance(s) contained and shall prevent the contamination of groundwater. The containment system shall also be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided;

n. Provide and maintain curbing, diking or other means of isolating process areas to the extent necessary to allow segregation and collection for treatment of contaminated stormwater from process areas;

o. Be reviewed by plant engineering staff and the plant manager; and

p. Bear the signature of the plant manager.

3. Compliance Schedule

The permittee shall have reviewed (and revised if necessary) and fully implemented the BMP plan as soon as practicable but no later than six months after the effective date of this permit.

4. Department Review

a. When requested by the Director or his designee, the permittee shall make the BMP available for Department review.

b. The Director or his designee may notify the permittee at any time that the BMP is deficient and require correction of the deficiency.

c. The permittee shall correct any BMP deficiency identified by the Director or his designee within 30 days of receipt of notification and shall certify to the Department that the correction has been made and implemented.

5. Administrative Procedures

a. A copy of the BMP shall be maintained at the facility and shall be available for inspection by representatives of the Department.

b. A log of the routine inspection required above shall be maintained at the facility and shall be available for inspection by representatives of the Department. The log shall contain records of all inspections performed for the last three years and each entry shall be signed by the person performing the inspection.

c. The permittee shall provide training for any personnel required to implement the BMP and shall retain documentation of such training at the facility. This documentation shall be available for inspection by representatives of the Department. Training shall be performed prior to the date that implementation of the BMP is required.

d. BMP Plan Modification. The permittee shall amend the BMP plan whenever there is a change in the facility or change in operation of the facility which materially increases the potential for the ancillary activities to result in a discharge of significant amounts of pollutants.

e. BMP Plan Review. The permittee shall complete a review and evaluation of the BMP plan at least once every three years from the date of preparation of the BMP plan. Documentation of the BMP Plan review and evaluation shall be signed and dated by the Plant Manager.

B. STORMWATER FLOW MEASUREMENT AND SAMPLING REQUIREMENTS

1. Stormwater Flow Measurement

   a. All stormwater samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches.

   b. The total volume of stormwater discharged for the event must be monitored, including the date and duration (in hours) and rainfall (in inches) for storm event(s) sampled. The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event must be a minimum of 72 hours. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

   c. The volume may be measured using flow measuring devices, or estimated based on a modification of the Rational Method using total depth of rainfall, the size of the drainage area serving a stormwater outfall, and an estimate of the runoff coefficient of the drainage area. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

2. Stormwater Sampling

   a. A grab sample, if required by this permit, shall be taken during the first thirty minutes of the discharge (or as soon thereafter as practicable); and a flow-weighted composite sample, if required by this permit, shall be taken for the entire event or for the first three hours of the event.

   b. All test procedures will be in accordance with part I.B. of this permit.

C. EFFLUENT TOXICITY LIMITATIONS AND BIOMONITORING REQUIREMENTS

1. The permittee shall perform 48-hour acute toxicity tests on the wastewater discharges required to be tested for acute toxicity by Part I of this permit.

   a. Test Requirements

      (1) The tests shall be diluted, using an appropriate control water, to 17% effluent.

      (2) Any test where survival in the effluent concentration is less than 90% and statistically lower than the control indicates acute toxicity and constitutes noncompliance with this permit.

   b. General Test Requirements:

      (1) A 24-hour composite sample shall be obtained for use in above biomonitoring tests. The holding time for each sample shall not exceed 36 hours. The control water shall be a water prepared in the laboratory in accordance with the EPA procedure described in EPA 821-R-02-012 or most current edition or another control water selected by the permittee and approved by the Department.

      Effluent toxicity tests in which the control survival is less than 90% or in which the other requirements of the EPA Test Procedure are not met shall be unacceptable and the permittee shall rerun the tests as soon as practical within the monitoring period.

      In the event of an invalid test, upon subsequent completion of a valid test, the results of all tests, valid and invalid, are reported with an explanation of the tests performed and results.

   c. Reporting Requirements:

      (1) The permittee shall notify the Department in writing within 48 hours after toxicity has been demonstrated by the scheduled test(s).

      (2) Biomonitoring test results obtained during each monitoring period shall be summarized and reported using the appropriate Discharge Monitoring Report (DMR) form approved by the Department. In accordance with Section 2. of this part, an effluent toxicity report containing the information in Section 2. shall be included with the DMR. Two copies of the test results

must be submitted to the Department no later than 28 days after the month in which the tests were performed.

d. Additional Testing Requirements:

(1) If acute toxicity is indicated (noncompliance with permit limit), the permittee shall perform four additional valid acute toxicity tests in accordance with these procedures to determine the extent and duration of the toxic condition. The toxicity tests shall be performed once per week and shall be performed during the first four calendar weeks following the date on which the permittee became aware of the permit noncompliance and the results of these tests shall be submitted no later than 28 days following the month in which the tests were performed.

(2) After evaluation of the results of the follow-up tests, the Department will determine if additional action is appropriate and may require additional testing and/or toxicity reduction measures. The permittee may be required to perform a Toxicity Identification Evaluation (TIE) and/or a Toxicity Reduction Evaluation (TRE). The TIE/TRE shall be performed in accordance with the most recent protocols/guidance outlined by EPA (e.g., EPA/600/2-88/062, EPA/600/R-92/080, EPA/600R-92/081, EPA/833/B-99/022 and/or EPA/600/6-91/005F, etc.).

e. Test Methods:

(1) The tests shall be performed in accordance with the latest edition of the "EPA Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms" and shall be performed using the fathead minnow (*Pimephales promelas*) and the cladoceran (*Ceriodaphnia dubia*).

2. Effluent toxicity testing reports

The following information shall be submitted with each discharge monitoring report unless otherwise directed by the Department. The Department may at any time suspend or reinstate this requirement or may increase or decrease the frequency of submittals.

a. Introduction

(1) Facility Name, location and county

(2) Permit number

(3) Toxicity testing requirements of permit

(4) Name of receiving water body

(5) Contract laboratory information (if tests are performed under contract)

(a) Name of firm

(b) Telephone number

(c) Address

(6) Objective of test

b. Plant Operations

(1) Discharge operating schedule (if other than continuous)

(2) Volume of discharge during sample collection to include Mean daily discharge on sample collection date (MGD, CFS, GPM)

(3) Design flow of treatment facility at time of sampling

c. Source of Effluent and Dilution Water

(1) Effluent samples

(a) Sampling point

(b) Sample collection dates and times (to include composite sample start and finish times)

(c) Sample collection method

(d) Physical and chemical data of undiluted effluent samples (water temperature, pH, alkalinity, hardness, specific conductance, total residual chlorine (if applicable), etc.)

(e) Sample temperature when received at the laboratory

(f) Lapsed time from sample collection to delivery

(g) Lapsed time from sample collection to test intiation

(2) Dilution Water Samples

(a) Source

(b) Collection date(s) and time(s) (where applicable)

(c) Pretreatment

(d) Physical and chemical characteristics (pH, hardness, water temperature, alkalinity, specific conductance, etc.)

d. Test Conditions

(1) Toxicity test method utilized

(2) End point(s) of test

(3) Deviations from referenced method, if any, and reason(s)

(4) Date and time test started

(5) Date and time test terminated

(6) Type and volume of test chambers

(7) Volume of solution per chamber

(8) Number of organisms per test chamber

(9) Number of replicate test chambers per treatment

(10) Test temperature, pH and dissolved oxygen as recommended by the method (to include ranges)

(11) Feeding frequency, and amount and type of food

(12) Light intensity (mean)

e. Test Organisms

(1) Scientific name

(2) Life stage and age

(3) Source

(4) Disease treatment (if applicable)

f. Quality Assurance

(1) Reference toxicant utilized and source

(2) Date and time of most recent acute reference toxicant test(s), raw data, and current cusum chart(s)

(3) Dilution water utilized in reference toxicant test

(4) Results of reference toxicant test(s) (LC50, etc.), report concentration-response relationship and evaluate test sensitivity. The most recent reference toxicant test shall be conducted within 30-days of the routine.

(5) Physical and chemical methods utilized

g. Results

(1) Provide raw toxicity data in tabular form, including daily records of affected organisms in each concentration (including controls) and replicate

(2) Provide table of endpoints: LC50, NOAEC, Pass/Fail (as required in the applicable NPDES permit)

(3) Indicate statistical methods used to calculate endpoints

(4) Provide all physical and chemical data required by method

(5) Results of test(s) (LC50, NOAEC, Pass/Fail, etc.), report concentration-response relationship (**definitive test only**), report percent minimum significant difference (PMSD).

h. Conclusions and Recommendations

(1) Relationship between test endpoints and permit limits

(2) Action to be taken

1/ Adapted from "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms", Fifth Edition, October 2002 (EPA 821-R-02-012), Section 12, Report Preparation

ADEM PERMIT RATIONALE

PREPARED DATE: May 14, 2020
PREPARED BY: Brian Marshall
REVISED BY: Ed Hughes/Wayne Holt
REVISION DATE: May 18, 2021
REVISED BY: Isabelle Berry
REVISION DATE: September 30, 2021

Permittee Name: T R Miller Mill Company Inc

Facility Name: T R Miller Mill Company Inc

Permit Number: AL0000779

PERMIT IS REISSUANCE DUE TO EXPIRATION

DISCHARGE SERIAL NUMBERS & DESCRIPTIONS:

DSN002: Treated process wastewater and treated groundwater.

DSN003: Storm water associated with lumber and wood products industry including wood treating operations using preservatives containing copper, chromium, and arsenic, creosote, and chlorophenolic formulations.

INDUSTRIAL CATEGORY: **Timber Products** - 40 CFR 429 Subpart G – Wood Preserving Steam Subcategory

MAJOR: N

STREAM INFORMATION:

Outfalls	DSN002	DSN003
Receiving Stream:	Murder Creek	UT to Murder Creek
Classification:	Fish & Wildlife	Fish & Wildlife
River Basin:	Escambia	Escambia
7Q10:	128.7 cfs	0.0 cfs
1Q10:	96.2 cfs	0.0 cfs
Annual Average Flow	679.58 cfs	0.31 cfs
303(d) List:	Yes	Yes*
Impairment:	Mercury	Mercury
TMDL:	No	No

*The unnamed tributary to Murder Creek is not specifically included on the 303(d) list, but because it drains to Murder Creek in the proximity of the listed segment, for the development of this permit it will be viewed as a listed stream for the pollutant of concern.

I/12/21 Revision Note: The discharge location of DSN002 was revised from the original draft. The location is based on updated GPS coordinates provided by the Facility.

DISCUSSION:

T R Miller operates a timber products facility in Brewton, Alabama. The facility produces utility poles at two different locations on-site with one plant treating with the oil-borne preservative pentachlorophenol and the other plant treating with the water borne preservative chromate copper arsenate (CCA). The facility also is permitted to discharge wastewater from a groundwater treatment system. Process water from the pentachlorophenol treatment

and any generated from the groundwater Corrective Action Program are directed to the wastewater facility which consists of precipitation/separation and oxidation using activated carbon adsorption. Treated wastewater is currently permitted to be discharged to Murder Creek via a pipeline. During the last five years, groundwater cleanup activities have not required pumping of groundwater. The permittee has requested reissuance of this permit to include the discharge of groundwater in case the discharge of treated groundwater may be required in the future. In addition, the facility anticipates that treatment with pentachlorophenol might cease by the end of 2021. Any process wastewaters generated in the meantime will be treated in batches and discharged at a rate of 5 gpm with a maximum discharge of 1000 gpd. The facility has requested that in view of the low volume of process wastewater flow (5 gpm), the DSN002 discharge be moved back to the surface drainage instead of being piped to Murder Creek. Due to the surface drainage occurring on T R Miller's property, the final discharge location of DSN002 is still considered to be Murder Creek, as that is where the discharge leaves the property.

ADEM Administrative Rule 335-6-10-.12 requires applicants to new or expanded discharges to Tier II waters demonstrate that the proposed discharge is necessary for important economic or social development in the area in which the waters are located. The application submitted by the facility is not for a new or expanded discharge. Therefore, the applicant is not required to demonstrate that the discharge is necessary for economic and social development.

0021: Treated process wastewater and treated groundwater

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Oxygen, Dissolved (DO)	-	-	REPORT mg/l	-	-	Monthly	Grab	BPJ
BOD, 5-Day (20 Deg. C)	4.05 lbs/day	6.07 lbs/day	-	-	-	Monthly	Grab	BPJ
pH	-	-	6.0 S.U.	-	9.0 S.U.	Weekly	Grab	EGL/BPJ
Oil & Grease	4.18 lbs/day	8.36 lbs/day	-	-	-	Monthly	Grab	EGL/BPJ
Nitrogen, Ammonia Total (As N)	2.7 lbs/day	4.05 lbs/day	-	-	-	Monthly	Grab	BPJ
Nitrogen, Kjeldahl Total (As N)	5.4 lbs/day	8.1 lbs/day	-	-	-	Monthly	Grab	BPJ
Arsenic, Total Recoverable	0.69 lbs/day	1.38 lbs/day	-	-	-	Monthly	Grab	WQBEL
Chromium Total Recoverable	0.63 lbs/day	1.25 lbs/day	-	-	-	Monthly	Grab	WQBEL/BPJ
Copper Total Recoverable	2.29 lbs/day	4.58 lbs/day	-	-	-	Monthly	Grab	WQBEL/BPJ
Acenaphthene	276 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	WQBEL/BPJ
Benzo (K) Fluoranthene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	WQBEL
Benzo (A) Pyrene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	WQBEL
Chrysene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	WQBEL
Fluorene	REPORT lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	BPJ
Benzo (A) Anthracene	0.0246 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	WQBEL
2,4-Dimethylphenol	34.56 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	WQBEL
2,4,6-Trichlorophenol	3.23 lbs/day	REPORT lbs/day	-	-	-	Monthly	Grab	WQBEL
Pentachlorophenol	2.97 lbs/day	3.15 lbs/day	-	-	-	Monthly	Grab	WQBEL/BPJ
Phenols	0.23 lbs/day	0.78 lbs/day	-	-	-	Monthly	Grab	EGL
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD	-	-	-	Daily	Totalizer	BPJ
Chemical Oxygen Demand (COD)	192.2 lbs/day	381.5 lbs/day	-	-	-	Monthly	Grab	EGL/BPJ

002Q: Treated process wastewater and treated groundwater

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Toxicity, Ceriodaphnia Acute	-	0 pass(0)/fail(1)	-	-	-	Quarterly	24-Hr Composite	WQBEL
Toxicity, Pimephales Acute	-	0 pass(0)/fail(1)	-	-	-	Quarterly	24-Hr Composite	WQBEL

003Q: Storm water associated with lumber and wood products industry including wood treating operations using preservatives containing copper, chromium, and arsenic, creosote, and chlorophenolic formulations.

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
Arsenic, Total Recoverable	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Chromium Total Recoverable	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Copper Total Recoverable	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Acenaphthylene	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Acenaphthene	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Benzo (K) Fluoranthene	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Benzo (A) Pyrene	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Chrysene	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Fluorene	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Phenanthrene	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
2,4-Dimethylphenol	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
2,4,6-Trichlorophenol	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Pentachlorophenol	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ
Phenols	-	-	-		REPORT ug/l	Quarterly	Grab	BPJ

003S: Storm water associated with lumber and wood products industry including wood treating operations using preservatives containing copper, chromium, and arsenic, creosote, and chlorophenolic formulations.

Parameter	Monthly Avg Loading	Daily Max Loading	Daily Min Concentration	Monthly Avg Concentration	Daily Max Concentration	Sample Frequency	Sample Type	Basis*
BOD, 5-Day (20 Deg. C)	-	-	-	REPORT mg/l	REPORT mg/l	Semi-Annually	Grab	BPJ
pH	-	-	REPORT S.U.	-	REPORT S.U.	Semi-Annually	Grab	BPJ
Solids, Total Suspended	-	-	-	REPORT mg/l	REPORT mg/l	Semi-Annually	Grab	BPJ
Oil and Grease	-	-	-	REPORT mg/l	15 mg/l	Semi-Annually	Grab	BPJ
Flow, In Conduit or Thru Treatment Plant	REPORT MGD	REPORT MGD				Semi-Annually	Measured	BPJ

*Basis for Permit Limitation

- BPJ – Best Professional Judgment
- WQBEL – Water Quality Based Effluent Limits
- EGL – Federal Effluent Guideline Limitations
- 303(d) – 303(d) List of Impaired Waters
- TMDL – Total Maximum Daily Load Requirement

Discussion

Reporting Requirements
The Part I.C.1.c permit language has been updated to reflect the electronic discharge monitoring reporting requirements due to the transition to the Department's new Alabama Environmental Permitting and Compliance System (AEPACS) from the e2 Reporting System.

DSN002: Treated process wastewater and treated groundwater

Wastewater from the Pentachlorophenol treating process emanates from three main sources: drip pad wash water, green timber steam drying process condensate and vacuum pump coolant blowdown. Groundwater collected as a part of the groundwater remediation project is also treated and permitted to discharge through this outfall. Parameters regulated by effluent guidelines are: COD, Phenols, Oil & Grease and pH. Parameters needed to evaluate water quality concerns include BOD, TKN, Nitrogen-Ammonia (as N), and Biomonitoring. In addition, based on the nature of this operation, the permittee's application and data collected in association with the existing permit, additional pollutants of concern are: Acenaphthene, Pentachlorophenol, 2,4-Dimethylphenol, 2,4,6-Trichlorophenol, Benzo(A)Anthracene, Benzo(A)Pyrene, Benzo(K)Fluoranthene, Chrysene, Fluorene, Total Recoverable Copper, Total Recoverable Chromium and Total Recoverable Arsenic.

Best Professional Judgment (BPJ)
These parameters are consistent with similar facilities in the state and have been proven to be reflective of the operations at this facility. The parameters with specific limits are discussed below:

pH
ADEM Administrative Code, Division 6 Regulations, specifically 335-6-10-.09 – Specific Water Quality for Fish and Wildlife classified streams states: "Sewage, industrial waste or other wastes shall not cause the pH to deviate more than one unit from then normal or natural pH, nor be less than 6.0, nor greater than 8.5 standard units." In view of the high ratio of stream flow as compared to wastewater flow, the existing upper limit of 9.0 will be adequate to protect water quality and ensure that the instream standard is met. The continuous monitoring pH excursion footnote on the permit limit pages is based on requirements at 40 CFR 401.17. This language allows short term excursions of the 6.0 to 9.0 range but, based on BPJ will provide adequate protection of instream water quality.

BOD_5, Ammonia, and TKN
In view of the volume of flow in the receiving stream, water quality based limits are not required. The previous permit established mass limits for BOD_5, Total Ammonia, and Total Kjeldahl Nitrogen (TKN) based on BPJ. The existing mass limits are proposed to be continued in this permit as they have been proven to be attainable and at these levels any effect on water quality in the receiving stream will be negligible.

Dissolved Oxygen
This permit proposes to continue the monitoring requirement with no limitation as it is not needed to protect water quality.

Federal Effluent Guideline Limitations (EGL)
Parameters based upon EGL have effluent guidelines established under the 40 CFR 429 Subpart G – Wood Preserving Steam Subcategory (40 CFR 429.81). The permittee's application indicates that the long term average production was 189,478 cu ft /month (highest year in the past five years). Based on a 30 day month this is a 6.31 x 1000 cu ft/day production level. Although the permittee has indicated that there has been no discharge of process wastewater in the past five years, this permit will use the reported production to calculate guideline based limits. Calculations are shown below:

Parameter	Daily Maximum (ppd)	Monthly Average (ppd)
COD	68.5*6.31 = 432.2	34.5 * 6.31= 217.7
Phenols	0.14 * 6.31 = 0.88	0.04 * 6.31 = 0.25
Oil & Grease	1.5 *6.31 = 9.46	0.75 * 6.31 = 4.73
pH range of 6.0 to 9.0		

Current limitations are more restrictive and will remain in effect for these parameters.

Water Quality Based Effluent Limits (WQBEL)

Water quality based limits were calculated for Acenaphthene, Pentachlorophenol, 2,4-Dimethylphenol, 2,4,6-Trichlorophenol, TR Copper, TR Chromium, TR Arsenic, Benzo(A)Anthracene, Benzo(A)Pyrene, Benzo(K)Fluoranthene, Chrysene, and Fluorene. The organic parameters chosen are pollutants typically found associated with wood treatment using chlorophenolic compounds. The metals being tested were chosen due to the CCA operation on site. The attached spreadsheet shows the calculated water quality based limits for these parameters. The table contained in the attachment compares the water quality based limits to the limits contained in the previous permit. This permit proposes to incorporate the more stringent of the two monthly average calculations for each of the parameters. The daily maximum for non-conventional pollutants was based on a peaking factor of 2. As in the previous issuance, Fluorene will be "monitor only" due to the unlikelihood that the discharge would contain the elevated concentration determined to protect water quality.

Reasonable Potential

The Department completed a reasonable potential analysis (RPA) of the discharge based on laboratory data provided in the Permittee's application. The RPA indicates whether pollutants in treated effluent have the potential to contribute to excursions of Alabama's in-stream water quality standards. Based on the analytical data available to the Department a reasonable potential does not exist to cause an in-stream water quality exceedance.

Acute Toxicity Biomonitoring

The potential volume of discharge through outfall DSN001 represents less than 1% of the stream 7Q10; therefore, acute toxicity testing is appropriate for this discharge. In previous permit re-issuances, Toxicity In-Stream Waste Concentrations (IWC) were based on a diffuser model that determined the IWC to be 0.04%. However, based on BPJ that previous permits continued the existing requirement of testing at 17% effluent. The facility has requested that the discharge no longer utilize the facility's diffuser.

Testing is proposed to be continued at 17%. Monitoring is proposed to remain at a frequency of once per quarter.

303(d) List of Impaired Waters/Total Maximum Daily Load (TMDL)

Murder Creek is listed on the 2020 303(d) List of Impaired Waters for Mercury. Although the unnamed tributary is not listed on the 303(d) list, it flows into Murder Creek in the segment affected by the listing. For purpose of developing this permit the tributary will be treated as impaired; however, because the discharge is not expected to contribute to the Mercury loading in the receiving stream, Mercury monitoring will not be imposed.

DSN0031: Stormwater runoff associated with lumber and wood products industry including wood treating operations using preservatives containing copper, chromium and arsenic creosote and chlorophenolic formulations

The process related areas at this site are all covered under roof; however, stormwater does come into contact with both treated and untreated poles in storage areas, roadways, parking lots and other areas associated with industrial activity. This water is discharged through outfall DSN003. Best Management Practices (BMPs) are utilized and are believed to be the most effective way to control the contamination of stormwater. This facility is required to maintain a BMP plan. The requirements of the BMP plan call for minimization of stormwater contact with waste materials, products and by-products, and for prevention of spills or loss of fluids from equipment maintenance activities. The effectiveness of the BMPs will be measured through the monitoring of the pollutants of concern.

The pollutants of concern are pH, BOD, TSS, Oil & Grease, Acenaphthene, Acenaphtylene, Benzo(K)fluoranthene, Benzo(A)pyrene, Chrysene, Fluorene, Phenanthrene, Pentachlorophenol, 2,4-Dimethylphenol, 2,4,6-

Trichlorophenol, Phenols, TR Copper, TR Chromium and TR Arsenic. Based on BPJ the existing quarterly monitoring requirements will be continued in this issuance with the exception of pH, BOD, Oil & Grease & TSS which shall remain at semi-annual.

Oil & Grease

This permit will continue the existing daily maximum limit of 15 mg/l for Oil & Grease. This limit has been proven to be achievable though the use of proper BMP measures and will be adequate to prevent the occurrence of a sheen in the receiving stream.

Best Management Practices (BMPs) are believed to be the most effective way to control the contamination of stormwater from areas of industrial activities. This facility is required to maintain a BMP plan. The requirements of the BMP plan call for minimization of stormwater contact with waste materials, products and by-products, and for prevention of spills or loss of fluids from equipment maintenance activities. The effectiveness of the BMPs will be measured through the monitoring of the pollutants of concern.

Revision May 18, 2021:

DSN002 WQBEL

The facility submitted comments and updated their application regarding the location of DSN002. Comments and the revised portions of the application are attached. Based on the facility's revisions to EPA Form 2C, along with revised topo maps of the location, Outfall DSN002's first contact with a "Water of the State" is considered to be Unnamed Tributary to Murder Creek. (Note: The previous permit listed Murder Creek as the receiving stream. Wastewaters were previously pumped to the creek via a pipeline. The facility has requested that the permit be written to allow the discharge to nearby storm drainage due to the low volume of flow).

Because of the changes describing the Outfall location of DSN002, revised Water Quality Based Effluent Limits (WQBEL) are proposed based on the 7Q10, 1Q10, and Annual Average flows of the UT to Murder Creek. The above rationale and WQBEL limits were revised to account for the change in the DSN002 discharge point.

Other changes required as result of comments received from the facility:

DSN002 Sample Types

The UV system for groundwater is/has been replaced with an activated carbon treatment system. The groundwater system will have a batch flow of no more than 1,000 gpd and the process wastewater will have a flow rate of approximately 5 gpm when discharging. The new treatment system does not have an automated pH monitor.

Based on the changes in the treatment system, pH monitoring is proposed to be changed to grab samples, and the monitoring requirements associated with continuous pH monitoring are proposed to be removed (i.e, length of longest pH, Daily excursion time, and pH excursions > 60 minutes).

Based on the batch discharge, the sample types for the following parameters are proposed to be changed from composite to grab:

> BOD5, Total Ammonia Nitrogen, TKN, Total Recoverable Arsenic, Total Recoverable Chromium, Total Recoverable Copper, and COD.

The permittee requested that the reporting frequency for DSN002 be changed from monthly to quarterly. In view of the much more stringent water quality based limits resulting from the change in receiving stream, the Department believes it is not appropriate to relax the reporting requirement in this issuance.

Revision September 29, 2021:

Based on discussions with the facility, it has been determined that Outfall DSN002 discharges to Murder Creek and not an Unnamed Tributary to Murder Creek. As such, monitoring limitations for parameters based on WQBELs have been reverted back to those of the June 11, 2020 draft, with corrections to calculation errors. Updated water quality calculations and RPA are attached. Other facility comments discussed in the May 18, 2021 revision are still applicable in this revision, including the changes in monitoring types and removal of pH excursions from the permit limitations.

Water Quality Calculations for TR Miller

September 29, 2021

Process Flow=	0.001 MGD	
Murder Creek 7Q10 =	128.7 cfs	83.2 MGD
Murder Creek 1Q10 =	96.2 cfs	62.2 MGD
Murder Creek Annual Average Flow =	679.58 cfs	439.2 MGD

Parameter	Existing Daily Max Limit	Existing Monthly Average Limit	WQ Acute Limit	WQ Chronic Limit	Human Health Limit
Acenaphthene	N/A	**276 ppd**	N/A	N/A	401.7 ppd
Pentachorophenol	**3.15 ppd**	**2.97 ppd**	4.51 ppd	4.65 ppd	6.48 ppd
2,4 Dimethylphenol	N/A	258 ppd	N/A	N/A	**34.56 ppd**
2,4,6 TCP	N/A	**3.23 ppd**	N/A	N/A	5.18 ppd
Total Recoverable Copper	8.68 ppd	8.2 ppd	23.86 ppd	**2.29 ppd**	N/A
Total Recoverable Chromium	**1.25 ppd**	**0.63 ppd**	3792.11 ppd	66.04 ppd	N/A
Total Recoverable Arsenic	1.38 ppd	**0.69 ppd**	534.4 ppd	170.89 ppd	1.1 ppd
Benzo (A) Anthracene	N/A	**0.0246 ppd**	N/A	N/A	0.039 ppd
Benzo (A) Pyrene	N/A	**0.0246 ppd**	N/A	N/A	0.039 ppd
Benzo (K) Fluoranthene	N/A	**0.0246 ppd**	N/A	N/A	0.039 ppd
Chrysene	N/A	**0.0246 ppd**	N/A	N/A	0.039 ppd
Flourene	N/A	N/A	N/A	N/A	11395 ppd

Acenaphthene (Non-Carcinogen)

Human Health Criteria (in mg/l) = 0.579

Limit=	(83.2+0.001) x (0.579)/0.001 =	48161.8	mg/l
Human Health Mass Limit=	48161.8 x 8.34 x 0.001	401.7	ppd

Pentachlorophenol (Carcinogen)

Using a pH of 7.0 s.u.

Freshwater Acute Aquatic Concentration (in mg/l)= 0.0087

Freshwater Chronic Aquatic Concentration (in mg/l)= 0.0067

Human Health Criteria (in mg/l)= 0.00177

Limit (acute) =	(62.2+0.001) x (0.0087)/0.001 =	541.15	mg/l
Acute Mass Limit=	541.15 x 8.34 x 0.001	4.51	ppd
Limit (Chronic) =	(83.2+0.001) x (0.0067)/0.001 =	557.31	mg/l
Chronic Mass Limit=	557.31 x 8.34 x 0.001	4.65	ppd
Limit (human health) =	(439.2+0.001) x (0.00177)/0.001 =	777.4	mg/l
HH Mass Limit=	777.4 x 8.34 x 0.001	6.48	ppd

2,4 Dimethylphenol (Non-Carcinogen)

Human Health Criteria (in mg/l)= 0.498

Limit=	(439.2+0.001) x (0.498)/0.001 =	4143.9	mg/l
Human Health Mass Limit=	4143.9 x 8.34 x 0.001	34.6	ppd

2,4,6 TCP (Carcinogen)	Human Health Criteria (in mg/l)= 0.001414		
Limit (human health) =	(439.2+0.01) x 0.001414)/0.01=	621.0	mg/l
HH Mass Limit=	621 x 8.34 x 0.001	5.18	ppd

Copper	Using a hardness (in mg/l) of 50		
	Freshwater Acute Aquatic Concentration (in mg/l)= 0.018		
	Freshwater Chronic Aquatic Concentration (in mg/l)= 0.0127		
	with Partition Coefficient		
	Freshwater Acute Aquatic Concentration (in mg/l)= 0.046		
	Freshwater Chronic Aquatic Concentration (in mg/l)= 0.033		
Limit (acute) =	(62.2+0.001) x (0.046)/0.001 =	2861.25	mg/l
Acute Mass Limit=	2861.25 x 8.34 x 0.001	23.86	ppd
Limit (Chronic) =	(83.2+0.001) x (0.033)/0.001 =	274.50	mg/l
Chronic Mass Limit=	274.5 x 8.34 x 0.001	2.3	ppd

Chromium	Using a hardness (in mg/l) of 50		
	Freshwater Acute Aquatic Concentration (in mg/l)= 1.537		
	Freshwater Chronic Aquatic Concentration (in mg/l)= 0.2		
	with Partition Coefficient		
	Freshwater Acute Aquatic Concentration (in mg/l)= 7.31		
	Freshwater Chronic Aquatic Concentration (in mg/l)= 0.952		
Limit (acute) =	(62.2+0.001) x (7.31)/0.001 =	454689.3	mg/l
Acute Mass Limit=	454689.31 x 8.34 x 0.001	3792	ppd
Limit (Chronic) =	(83.2+0.001) x (0.952)/0.001 =	7918.8	mg/l
Chronic Mass Limit=	7918.8 x 8.34 x 0.001	66.0	ppd

Arsenic (Carcinogen)	Human Health Concentration (in mg/l) = 0.0003		
	Freshwater Acute Aquatic Concentration (in mg/l)= 0.592		
	Freshwater Chronic Aquatic Concentration (in mg/l)= 0.261		
	with Partition Coefficient		
	Freshwater Acute Aquatic Concentration (in mg/l)= 1.03		
	Freshwater Chronic Aquatic Concentration (in mg/l)= 0.455		
Limit (acute) =	(62.2+0.01) x 1.03)/0.01=	64067.0	mg/l
Acute Mass Limit=	64067.03 x 8.34 x 0.001	534.3	ppd
Limit (Chronic) =	(83.2+0.01) x 0.455)/0.01=	3784.7	mg/l
Chronic Mass Limit=	3784.74 x 8.34 x 0.001	31.6	ppd
Limit (human health) =	(439.2+0.001) x (0.0003)/0.001 =	131.76	mg/l
HH Mass Limit=	131.76 x 8.34 x 0.001	1.10	ppd

Benzo (a) Anthracene (Carcinogen)	Human Health Concentration (in mg/l) = 0.0000107		
Limit (human health) =	(439.2+0.001) x (0.0000107)/0.001 =	4.70	mg/l
HH Mass Limit=	4.7 x 8.34 x 0.001	0.039	ppd

Benzo (a) Pyrene (Carcinogen)	Human Health Concentration (in mg/l) = 0.0000107		
Limit (human health) =	(439.2+0.001) x (0.0000107)/0.001 =	4.70	mg/l
HH Mass Limit=	4.7 x 8.34 x 0.001	0.039	ppd

Benzo (K) Fluoranthene (Carcinogen)	Human Health Concentration (in mg/l) = 0.0000107		
Limit (human health) =	(439.2+0.001) x (0.0000107)/0.001 =	4.70	mg/l
HH Mass Limit=	4.7 x 8.34 x 0.001	0.039	ppd

Chrysene(Carcinogen)	Human Health Concentration (in mg/l) = 0.0000107		
Limit (human health) =	(439.2+0.001) x (0.0000107)/0.001 =	4.70	mg/l
HH Mass Limit=	4.7 x 8.34 x 0.001	0.039	ppd

Fluorene	Human Health Concentration (in mg/l) = 3.111		
Limit (human health) =	(439.2+0.001) x (3.111)/0.001 =	1366354	mg/l
HH Mass Limit=	1366354.31 x 8.34 x 0.001	11395	ppd

Facility Name: TR Miller Mill Company, Inc.

NPDES No.: AL0000779

8/13/2017

$$Q_d*C_d + Q_{d2}*C_{d2} + Q_s*C_s = Q_r*C_r$$

ID	Pollutant	Carcinogen "Yes"	Type	Background from upstream source (C_{d2}) Daily Max	Background from upstream source (C_{d2}) Monthly Ave	Background Instream (C_s) Daily Max	Background Instream (C_s) Monthly Ave	Enter Max Daily Discharge as reported by Applicant (C_d) Max	Enter Avg Daily Discharge as reported by Applicant (C_d) Ave	Partition Coefficient (Stream / Lake)
				µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	
1	Antimony		Metals	0	0	0	0	0	0	-
2	Arsenic†,**	YES	Metals	0	0	0	0	5.1	2.7	0.574
3	Beryllium		Metals	0	0	0	0	0	0	-
4	Cadmium**		Metals	0	0	0	0	0	0	0.236
5	Chromium / Chromium III**		Metals	0	0	0	0	6	3	0.210
6	Chromium / Chromium VI**		Metals	0	0	0	0	0	0	-
7	Copper**		Metals	0	0	0	0	290	39.2	0.368
8	Lead**		Metals	0	0	0	0	0	0	0.205
9	Mercury**		Metals	0	0	0	0	0	0	0.302
10	Nickel**		Metals	0	0	0	0	0	0	0.505
11	Selenium		Metals	0	0	0	0	0	0	-
12	Silver		Metals	0	0	0	0	0	0	-
13	Thallium		Metals	0	0	0	0	0	0	-
14	Zinc**		Metals	0	0	0	0	0	0	0.330
15	Cyanide		Metals	0	0	0	0	0	0	-
16	Total Phenolic Compounds		Metals	0	0	0	0	0	0	-
17	Hardness (As CaCO3)		Metals	0	0	0	0	0	0	-
18	Acrolein		VOC	0	0	0	0	0	0	-
19	Acrylonitrile*	YES	VOC	0	0	0	0	0	0	-
20	Aldrin	YES	VOC	0	0	0	0	0	0	-
21	Benzene*	YES	VOC	0	0	0	0	0	0	-
22	Bromoform*	YES	VOC	0	0	0	0	0	0	-
23	Carbon Tetrachloride*	YES	VOC	0	0	0	0	0	0	-
24	Chlordane	YES	VOC	0	0	0	0	0	0	-
25	Clorobenzene		VOC	0	0	0	0	0	0	-
26	Chlorodibromo-Methane*	YES	VOC	0	0	0	0	0	0	-
27	Chloroethane		VOC	0	0	0	0	0	0	-
28	2-Chloro-Ethylvinyl Ether		VOC	0	0	0	0	0	0	-
29	Chloroform*	YES	VOC	0	0	0	0	0	0	-
30	4,4'-DDD	YES	VOC	0	0	0	0	0	0	-
31	4,4'-DDE	YES	VOC	0	0	0	0	0	0	-
32	4,4'-DDT	YES	VOC	0	0	0	0	0	0	-
33	Dichlorobromo-Methane*	YES	VOC	0	0	0	0	0	0	-
34	1, 1-Dichloroethane		VOC	0	0	0	0	0	0	-
35	1, 2-Dichloroethane*	YES	VOC	0	0	0	0	0	0	-
36	Trans-1, 2-Dichloro-Ethylene		VOC	0	0	0	0	0	0	-
37	1, 1-Dichloroethylene*	YES	VOC	0	0	0	0	0	0	-
38	1, 2-Dichloropropane		VOC	0	0	0	0	0	0	-
39	1, 3-Dichloro-Propylene		VOC	0	0	0	0	0	0	-
40	Dieldrin	YES	VOC	0	0	0	0	0	0	-
41	Ethylbenzene		VOC	0	0	0	0	0	0	-
42	Methyl Bromide		VOC	0	0	0	0	0	0	-
43	Methyl Chloride		VOC	0	0	0	0	0	0	-
44	Methylene Chloride*	YES	VOC	0	0	0	0	0	0	-
45	1, 1, 2, 2-Tetrachloro-Ethane*	YES	VOC	0	0	0	0	0	0	-
46	Tetrachloro-Ethylene*	YES	VOC	0	0	0	0	0	0	-
47	Toluene		VOC	0	0	0	0	0	0	-
48	Toxaphene	YES	VOC	0	0	0	0	0	0	-
49	Tributyltine (TBT)	YES	VOC	0	0	0	0	0	0	-
50	1, 1, 1-Trichloroethane		VOC	0	0	0	0	0	0	-
51	1, 1, 2-Trichloroethane*	YES	VOC	0	0	0	0	0	0	-
52	Trichloroethylene*	YES	VOC	0	0	0	0	0	0	-
53	Vinyl Chloride*	YES	VOC	0	0	0	0	0	0	-
54	P-Chloro-M-Cresol		Acids	0	0	0	0	0	0	-
55	2-Chlorophenol		Acids	0	0	0	0	0	0	-
56	2, 4-Dichlorophenol		Acids	0	0	0	0	0	0	-
57	2, 4-Dimethylphenol		Acids	0	0	0	0	0	0	-
58	4, 6-Dinitro-O-Cresol		Acids	0	0	0	0	0	0	-
59	2, 4-Dinitrophenol		Acids	0	0	0	0	0	0	-
60	4,6-Dinitro-2-methylphenol	YES	Acids	0	0	0	0	0	0	-
61	Dioxin (2,3,7,8-TCDD)	YES	Acids	0	0	0	0	0	0	-
62	2-Nitrophenol		Acids	0	0	0	0	0	0	-
63	4-Nitrophenol		Acids	0	0	0	0	0	0	-
64	Pentachlorophenol*	YES	Acids	0	0	0	0	0	0	-
65	Phenol		Acids	0	0	0	0	12	5.5	-
66	2, 4, 6-Trichlorophenol*	YES	Acids	0	0	0	0	0	0	-
67	Acenaphthene		Bases	0	0	0	0	0	0	-
68	Acenaphthylene		Bases	0	0	0	0	0	0	-
69	Anthracene		Bases	0	0	0	0	0	0	-
70	Benzidine		Bases	0	0	0	0	0	0	-
71	Benzo(A)Anthracene*	YES	Bases	0	0	0	0	0	0	-
72	Benzo(A)Pyrene*	YES	Bases	0	0	0	0	0	0	-
73	3, 4 Benzo-Fluoranthene		Bases	0	0	0	0	0	0	-
74	Benzo(GHI)Perylene		Bases	0	0	0	0	0	0	-
75	Benzo(K)Fluoranthene		Bases	0	0	0	0	0	0	-
76	Bis (2-Chloroethoxy) Methane		Bases	0	0	0	0	0	0	-
77	Bis (2-Chloroethyl)-Ether*	YES	Bases	0	0	0	0	0	0	-
78	Bis (2-Chloroiso-Propyl) Ether		Bases	0	0	0	0	0	0	-
79	Bis (2-Ethylhexyl) Phthalate*	YES	Bases	0	0	0	0	0	0	-
80	4-Bromophenyl Phenyl Ether		Bases	0	0	0	0	0	0	-
81	Butyl Benzyl Phthalate		Bases	0	0	0	0	0	0	-
82	2-Chloronaphalene		Bases	0	0	0	0	0	0	-
83	4-Chlorophenyl Phenyl Ether		Bases	0	0	0	0	0	0	-
84	Chrysene*	YES	Bases	0	0	0	0	0	0	-
85	Di-N-Butyl Phthalate		Bases	0	0	0	0	0	0	-
86	Di-N-Octyl Phthalate		Bases	0	0	0	0	0	0	-
87	Dibenzo(A,H)Anthracene*	YES	Bases	0	0	0	0	0	0	-
88	1, 2-Dichlorobenzene		Bases	0	0	0	0	0	0	-
89	1, 3-Dichlorobenzene		Bases	0	0	0	0	0	0	-
90	1, 4-Dichlorobenzene		Bases	0	0	0	0	0	0	-
91	3, 3-Dichlorobenzidine*	YES	Bases	0	0	0	0	0	0	-
92	Diethyl Phthalate		Bases	0	0	0	0	0	0	-
93	Dimethyl Phthalate		Bases	0	0	0	0	0	0	-
94	2, 4-Dinitrotoluene*	YES	Bases	0	0	0	0	0	0	-
95	2, 6-Dinitrotoluene		Bases	0	0	0	0	0	0	-
96	1,2-Diphenylhydrazine		Bases	0	0	0	0	0	0	-
97	Endosulfan (alpha)	YES	Bases	0	0	0	0	0	0	-
98	Endosulfan (beta)	YES	Bases	0	0	0	0	0	0	-
99	Endosulfan sulfate	YES	Bases	0	0	0	0	0	0	-
100	Endrin	YES	Bases	0	0	0	0	0	0	-
101	Endrin Aldeyhide	YES	Bases	0	0	0	0	0	0	-
102	Fluoranthene		Bases	0	0	0	0	0	0	-
103	Fluorene		Bases	0	0	0	0	0	0	-
104	Heptachlor	YES	Bases	0	0	0	0	0	0	-
105	Heptachlor Epoxide	YES	Bases	0	0	0	0	0	0	-
106	Hexachlorobenzene*	YES	Bases	0	0	0	0	0	0	-
107	Hexachlorobutadiene*	YES	Bases	0	0	0	0	0	0	-
108	Hexachlorocyclohexan (alpa)	YES	Bases	0	0	0	0	0	0	-
109	Hexachlorocyclohexan (beta)	YES	Bases	0	0	0	0	0	0	-
110	Hexachlorocyclohexan (gamma)	YES	Bases	0	0	0	0	0	0	-
111	HexachlorocycloPentadiene		Bases	0	0	0	0	0	0	-
112	Hexachloroethane		Bases	0	0	0	0	0	0	-
113	Indeno(1, 2, 3-CD)Pyrene*	YES	Bases	0	0	0	0	0	0	-
114	Isophorone		Bases	0	0	0	0	0	0	-
115	Naphthalene		Bases	0	0	0	0	0	0	-
116	Nitrobenzene		Bases	0	0	0	0	0	0	-
117	N-Nitrosodi-N-Propylamine*	YES	Bases	0	0	0	0	0	0	-
118	N-Nitrosodi-N-Methylamine*	YES	Bases	0	0	0	0	0	0	-
119	N-Nitrosodi-N-Phenylamine*	YES	Bases	0	0	0	0	0	0	-
120	PCB-1016	YES	Bases	0	0	0	0	0	0	-
121	PCB-1221	YES	Bases	0	0	0	0	0	0	-
122	PCB-1232	YES	Bases	0	0	0	0	0	0	-
123	PCB-1242	YES	Bases	0	0	0	0	0	0	-
124	PCB-1248	YES	Bases	0	0	0	0	0	0	-
125	PCB-1254	YES	Bases	0	0	0	0	0	0	-
126	PCB-1260	YES	Bases	0	0	0	0	0	0	-
127	Phenanthrene		Bases	0	0	0	0	0	0	-
128	Pyrene		Bases	0	0	0	0	0	0	-
129	1, 2, 4-Trichlorobenzene		Bases	0	0	0	0	0	0	-

† Inorganic

0.001	Enter Q_d = wastewater discharge flow from facility (MGD)
0.00154723	Q_s = wastewater discharge flow (cfs) (this value is calculated from the MGD)
0	Enter flow from upstream discharge Qd2 = background stream flow in MGD above point of discharge
0	Qd2 = background stream flow from upstream source (cfs)
128.27	Enter 7Q10, Q_s = background stream flow in cfs above point of discharge
98.2	Enter or estimated, 1Q10, Q_s = background stream flow in cfs above point of discharge (1Q10 estimated at 75% of 7Q10)
679.58	Enter Mean Annual Flow, Q_s = background stream flow in cfs above point of discharge
211.25	Enter 7Q2, Q_s = background stream flow in cfs above point of discharge (For tWF class streams)
Enter to Left	Enter C_s = background in-stream pollutant concentration in µg/l (assuming this is zero "0" unless there is data)
Q_s +Qd2+Q_d	Q_r = resultant in-stream flow, after discharge
Calculated on other	C_r = resultant in-stream pollutant concentration in µg/l in the stream (after complete mixing occurs)
50	Enter, Background Hardness above point of discharge (assumed 50 South of Birmingham and 100 North of Birmingham)
7.00 s.u.	Enter, Background pH above point of discharge
YES	Enter, Is discharge to a stream? "YES" Other option would be to a Lake. (This changes the partition coefficients for the metals)

** Using Partition Coefficients

September 30, 2021

Facility Name: TR Miller Mill Company, Inc.

NPDES No.: AL0000779

						Freshwater F&W classification.						Freshwater Acute (µg/l) Q_s = 1Q10					Freshwater Chronic (µg/l) Q_s = 7Q10					Human Health Consumption Fish only (µg/l) Carcinogen Q_s = Annual Average Non-Carcinogen Q_s = 7Q10			
ID	Pollutant	RP?	Carcinogen yes	Background from upstream source (Cd2) Daily Max	Max Daily Discharge as reported by Applicant (C_{max})	Water Quality Criteria (C_s)	Draft Permit Limit (C_{max})	20% of Draft Permit Limit	RP?	Background from upstream source (Cd2) Monthly Ave	Avg Daily Discharge as reported by Applicant (C_{avg})	Water Quality Criteria (C_s)	Draft Permit Limit (C_{max})	20% of Draft Permit Limit	RP?	Water Quality Criteria (C_s)	Draft Permit Limit (C_{max})	20% of Draft Permit Limit	RP?
1	Antimony			0	0	-	-	-	-	0	0	-	-	-	-	3.73E+02	3.10E+07	6.19E+06	No
2	Arsenic		YES	0	5.1	362.334	36829386.518	7365877.304	No	0	2.7	261.324	21684820.837	4332964.178	No	3.03E-01	1.33E+05	2.66E+04	No
3	Beryllium			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
4	Cadmium			0	0	4.347	270290.017	54058.003	No	0	0	0.644	53357.829	10671.566	No	-	-	-	-
5	Chromium/ Chromium III			0	6	1537.913	95622303.902	19124460.780	No	0	3	200.051	16585027.183	3317005.437	No	-	-	-	-
6	Chromium/ Chromium VI			0	0	16.000	994826.723	198965.345	No	0	0	11.000	911944.526	182388.905	No	-	-	-	-
7	Copper			0	290	19.026	1120820.037	224164.007	No	0	39.2	12.766	1058317.322	211663.464	No	-	-	-	-
8	Lead			0	0	148.291	9095877.459	1819175.492	No	0	0	5.701	472614.763	94522.953	No	-	-	-	-
9	Mercury			0	0	2.400	149224.008	29844.802	No	0	0	0.012	994.849	198.970	No	4.24E-02	3.52E+03	7.03E+02	No
10	Nickel			0	0	515.824	32072240.773	6414448.155	No	0	0	57.292	4749752.041	949950.408	No	9.93E+02	8.23E+07	1.65E+07	No
11	Selenium			0	0	20.000	1243533.464	248706.681	No	0	0	5.000	414520.240	82904.048	No	2.43E+03	2.02E+08	4.03E+07	No
12	Silver			0	0	0.976	60711.947	12142.389	No	0	0	-	-	-	-	-	-	-	-
13	Thallium			0	0	-	-	-	-	0	0	-	-	-	-	2.74E-01	2.27E+04	4.54E+03	No
14	Zinc			0	0	197.369	12271735.374	2454347.075	No	0	0	160.963	18496518.250	3299303.850	No	1.49E+04	1.23E+09	2.47E+08	No
15	Cyanide			0	0	22.000	1367688.744	273577.349	No	0	0	5.200	431101.043	86220.210	No	6.33E+03	5.24E+08	1.05E+08	No
16	Total Phenolic Compounds			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
17	Hardness (As CaCO3)			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
18	Acrolein			0	0	-	-	-	-	0	0	-	-	-	-	5.43E+00	4.50E+05	9.00E+04	No
19	Acrylonitrile		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.44E-01	6.33E+04	1.27E+04	No
20	Aldrin		YES	0	0	3.000	186530.011	37306.002	No	0	0	-	-	-	-	2.94E-05	1.29E+01	2.58E+00	No
21	Benzene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.55E+01	6.80E+06	1.36E+06	No
22	Bromoform		YES	0	0	-	-	-	-	0	0	-	-	-	-	7.88E+01	3.46E+07	6.92E+06	No
23	Carbon Tetrachloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.57E-01	4.20E+05	8.41E+04	No
24	Chlordane		YES	0	0	2.400	149224.008	29844.802	No	0	0	0.0043	356.467	71.297	No	4.73E-04	2.08E+02	4.15E+01	No
25	Clorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	5.06E+02	7.51E+07	1.50E+07	No
26	Chlorodibromo-Methane		YES	0	0	-	-	-	-	0	0	-	-	-	-	7.41E+00	3.25E+06	6.51E+05	No
27	Chloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
28	2-Chloro-Ethylvinyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
29	Chloroform		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.02E+02	4.48E+07	8.96E+06	No
30	4,4' - DDD		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.81E-04	7.97E+01	1.59E+01	No
31	4,4' - DDE		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.28E-04	5.62E+01	1.12E+01	No
32	4,4' - DDT		YES	0	0	1.100	68394.337	13678.867	No	0	0	0.001	82.904	16.581	No	1.28E-04	5.62E+01	1.12E+01	No
33	Dichlorobromo-Methane		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.00E+01	4.41E+06	8.82E+05	No
34	1, 1-Dichloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
35	1, 2-Dichloroethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.14E+01	9.39E+06	1.88E+06	No
36	Trans-1, 2-Dichloro-Ethylene			0	0	-	-	-	-	0	0	-	-	-	-	5.91E+03	4.90E+08	9.78E+07	No
37	1, 1-Dichloroethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	4.17E+03	1.83E+09	3.66E+08	No
38	1, 2-Dichloropropane			0	0	-	-	-	-	0	0	-	-	-	-	8.49E+00	7.04E+05	1.41E+05	No
39	1, 3-Dichloro-Propylene			0	0	-	-	-	-	0	0	-	-	-	-	1.23E+01	1.02E+06	2.04E+05	No
40	Dieldrin		YES	0	0	0.240	14922.401	2984.480	No	0	0	0.056	4642.627	928.525	No	3.12E-05	1.37E+01	2.74E+00	No
41	Ethylbenzene			0	0	-	-	-	-	0	0	-	-	-	-	5.24E+03	1.03E+08	2.06E+07	No
42	Methyl Bromide			0	0	-	-	-	-	0	0	-	-	-	-	8.71E+02	7.22E+07	1.44E+07	No
43	Methyl Chloride			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
44	Methylene Chloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.46E+02	1.52E+08	3.04E+07	No
45	1, 1, 2, 2-Tetrachloro-Ethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.33E+00	1.02E+06	2.05E+05	No
46	Tetrachloro-Ethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.92E+00	8.42E+05	1.68E+05	No
47	Toluene			0	0	-	-	-	-	0	0	-	-	-	-	8.72E+03	7.23E+08	1.45E+08	No
48	Toxaphene		YES	0	0	0.730	45388.969	9077.794	No	0	0	0.0002	16.581	3.316	No	1.62E-04	7.11E+01	1.42E+01	No
49	Tributyltin (TBT)		YES	0	0	0.400	28601.268	5720.254	No	0	0	0.072	5969.091	1193.818	No	-	-	-	-
50	1, 1, 1-Trichloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
51	1, 1, 2-Trichloroethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.10E+00	4.00E+06	7.99E+05	No
52	Trichloroethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.75E+01	7.67E+06	1.53E+06	No
53	Vinyl Chloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.42E+00	6.26E+05	1.25E+05	No
54	P-Chloro-M-Cresol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
55	2-Chlorophenol			0	0	-	-	-	-	0	0	-	-	-	-	8.71E+01	7.22E+08	1.44E+08	No
56	2, 4-Dichlorophenol			0	0	-	-	-	-	0	0	-	-	-	-	1.72E+02	1.43E+07	2.85E+08	No
57	2, 4-Dimethylphenol			0	0	-	-	-	-	0	0	-	-	-	-	4.95E+02	4.12E+07	8.25E+08	No
58	4, 6-Dinitro-O-Cresol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
59	2, 4-Dinitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	5.11E+03	2.58E+08	5.16E+07	No
60	4,6-Dinitro-2-methylphenol		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.65E+02	7.27E+07	1.45E+07	No
61	Dioxin (2,3,7,8-TCDD)		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.57E-08	1.17E-02	2.34E-03	No
62	2-Nitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
63	4-Nitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
64	Pentachlorophenol		YES	0	0	8.720	542387.045	108477.409	No	0	0	6.603	554842.278	110968.456	No	1.77E+00	7.76E+05	1.55E+05	No
65	Phenol			0	12	-	-	-	-	0	5.5	-	-	-	-	5.00E+05	4.15E+10	8.29E+09	No
66	2, 4, 6-Trichlorophenol		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.41E+00	6.21E+05	1.24E+05	No
67	Acenaphthene			0	0	-	-	-	-	0	0	-	-	-	-	5.79E+02	4.80E+07	9.59E+06	No
68	Acenaphthylene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
69	Anthracene			0	0	-	-	-	-	0	0	-	-	-	-	2.34E+04	1.93E+09	3.87E+08	No
70	Benzidine			0	0	-	-	-	-	0	0	-	-	-	-	1.16E-04	9.61E+00	1.92E+00	No
71	Benzo(A)Anthracene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	4.68E+03	9.36E+02	No
72	Benzo(A)Pyrene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	4.68E+03	9.36E+02	No
73	Benzo(b)fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	8.83E+02	1.77E+02	No
74	Benzo(GHI)Perylene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
75	Benzo(K)Fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	8.83E+02	1.77E+02	No
76	Bis (2-Chloroethoxy) Methane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
77	Bis (2-Chloroethyl)-Ether		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.07E-01	1.35E+05	2.70E+04	No
78	Bis (2-Chloroiso-Propyl) Ether			0	0	-	-	-	-	0	0	-	-	-	-	3.73E+04	3.13E+09	6.27E+08	No
79	Bis (2-Ethylhexyl) Phthalate		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.28E+00	5.63E+05	1.13E+05	No
80	4-Bromophenyl Phenyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
81	Butyl Benzyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	1.13E+03	9.35E+07	1.87E+07	No
82	2-Chloronaphthalene			0	0	-	-	-	-	0	0	-	-	-	-	9.24E+02	7.66E+07	1.53E+07	No
83	4-Chlorophenyl Phenyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
84	Chrysene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	4.68E+03	9.36E+02	No
85	Di-N-Butyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	2.62E+03	2.17E+08	4.35E+07	No
86	Di-N-Octyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
87	Dibenzo(A,H)Anthracene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	4.68E+03	9.36E+02	No
88	1, 2-Dichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	7.55E+02	6.26E+07	1.25E+07	No
89	1, 3-Dichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	1.62E+02	4.66E+07	9.32E+06	No
90	1, 4-Dichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	1.12E+02	9.32E+06	1.86E+06	No
91	3, 3-Dichlorobenzidine		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.66E+02	7.30E+03	1.46E+03	No
92	Diethyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	2.56E+04	2.12E+09	4.24E+08	No
93	Dimethyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	6.43E+05	5.37E+10	1.07E+10	No
94	2, 4-Dinitrotoluene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.39E+00	8.70E+05	1.74E+05	No
95	2, 6-Dinitrotoluene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
96	1,2-Diphenylhydrazine			0	0	-	-	-	-	0	0	-	-	-	-	1.17E-01	9.71E+03	1.94E+03	No
97	Endosulfan (alpha)		YES	0	0	0.22	13678.867	2735.773	No	0	0	0.056	4642.627	928.525	No	5.19E+01	2.28E+07	4.55E+06	No
98	Endosulfan (beta)		YES	0	0	0.22	13678.867	2735.773	No	0	0	0.056	4642.627	928.525	No	5.19E+01	2.28E+07	4.55E+06	No
99	Endosulfan sulfate		YES	0	0	-	-	-	-	0	0	-	-	-	-	5.19E+01	2.28E+07	4.55E+06	No
100	Endrin		YES	0	0	0.086	5347.194	1069.439	No	0	0	0.036	2984.548	596.900	No	3.53E-02	1.55E+04	3.10E+03	No
101	Endrin Aldehyde		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.76E+01	7.74E+04	1.55E+04	No
102	Fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	6.12E+01	1.35E+08	1.35E+08	No
103	Fluorene			0	0	-	-	-	-	0	0	-	-	-	-	5.11E+03	2.58E+08	5.16E+07	No
104	Heptachlor		YES	0	0	0.52	32331.868	6466.374	No	0	0	0.0038	315.035	63.007	No	1.63E-03	2.03E+01	4.07E+00	No
105	Heptachlor Epoxide		YES	0	0	0.52	32331.868	6466.374	No	0	0	0.0038	315.035	63.007	No	2.29E-05	1.01E+01	2.01E+00	No
106	Hexachlorobenzene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.68E-04	7.37E+01	1.47E+01	No
107	Hexachlorobutadiene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.08E+01	4.73E+06	9.45E+05	No
108	Hexachlorocyclohexan (alpha)		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.85E-03	1.25E+03	2.50E+02	No
109	Hexachlorocyclohexan (beta)		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.97E-03	4.38E+03	8.76E+02	No
110	Hexachlorocyclohexan (gamma)		YES	0	0	0.95	59067.837	11813.567	No	0	0	-	-	-	-	1.08E+00	4.73E+05	9.46E+04	No
111	HexachlorocyclоPentadiene			0	0	-	-	-	-	0	0	-	-	-	-	8.15E+02	5.35E+07	1.07E+07	No
112	Hexachloroethane			0	0	-	-	-	-	0	0	-	-	-	-	1.92E+00	1.59E+05	3.18E+04	No
113	Indeno(1, 2, 3-CD)Pyrene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	4.68E+03	9.36E+02	No
114	Isophorone			0	0	-	-	-	-	0	0	-	-	-	-	5.61E+02	4.65E+07	9.30E+06	No
115	Naphthalene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
116	Nitrobenzene			0	0	-	-	-	-	0	0	-	-	-	-	4.04E+02	3.35E+07	6.69E+06	No
117	N-Nitrosodi-N-Propylamine		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.95E-01	1.30E+05	2.59E+04	No
118	N-Nitrosodimethylamine		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.78E+00	7.73E+05	1.55E+05	No
119	N-Nitrosodiphenylamine		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.50E+00	1.54E+06	3.08E+05	No
120	PCB-1016		YES	0	0	-	-	-	-	0	0	0.014	1160.657	232.131	No	3.74E-05	1.64E+01	3.28E+00	No
121	PCB-1221		YES	0	0	-	-	-	-	0	0	0.014	1160.657	232.131	No	3.74E-05	1.64E+01	3.28E+00	No
122	PCB-1232		YES	0	0	-	-	-	-	0	0	0.014	1160.657	232.131	No	3.74E-05	1.64E+01	3.28E+00	No
123	PCB-1242		YES	0	0	-	-	-	-	0	0	0.014	1160.657	232.131	No	3.74E-05	1.64E+01	3.28E+00	No
124	PCB-1248		YES	0	0	-	-	-	-	0	0	0.014	1160.657	232.131	No	3.74E-05	1.64E+01	3.28E+00	No
125	PCB-1254		YES	0	0	-	-	-	-	0	0	0.014	1160.657	232.131	No	3.74E-05	1.64E+01	3.28E+00	No
126	PCB-1260		YES	0	0	-	-	-	-	0	0	0.014	1160.657	232.131	No	3.74E-05	1.64E+01	3.28E+00	No
127	Phenanthrene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
128	Pyrene			0	0	-	-	-	-	0	0	-	-	-	-	2.35E+03	1.93E+08	3.87E+07	No
129	1, 2, 4-Trichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	4.09E+01	3.39E+06	6.79E+05	No

T. R. Miller Mill Company) Inc.

215 Deer Street, P. O. Box 708, Brewton, Alabama 36427

Richard K. Stanley
President and CEO

SINCE 1872

Telephone; 251-867-4331
Facsimile; 251-867-6882
Outside Alabama; 800-633-6740
Inside Alabama; 800-672-1614

August 13,2020

CERTIFIED MAIL, RETURN RECEIPT REQUESTED-7017 2400 0000 1402 1052

Mr. Jeffery W. Kitchens, Chief
ADEM - Water Division
P. O. Box 301463
Montgomery, AL 36130-1463

Re: Comments on Draft Permit
T. R. Miller Mill Company, Inc.
NPDES Permit No. AL 0000779

Dear Mr. Kitchens:

We would like to provide the following comments to our NPDES Permit currently at public notice. Several updates to the parameters, frequencies, and sample types are required due to our intent to utilize carbon adsorption treatment rather than ultraviolet treatment.

Due to its operational complexity, its inability to handle low volume periodic flows, and its complex maintenance requirements, T. R. Miller proposed in its renewal application to replace the UV system with a new activated carbon treatment system. The activated carbon system will be designed to meet the present applicable limits and have a batch flow of no more than 1,000 GPD with a flow rate of 5 gpm when process wastewater alone is discharged. The system will have the capacity for higher flows on a continuous basis in the event that ADEM requires a resumption of active groundwater remediation. Presently, it is believed that pentachlorophenol will no longer be produced after 2021, so it is possible we will not need a wastewater treatment system for production purposes. If process wastewater is generated prior to this, it will be treated in batches and the treated wastewater will be stored in a tank prior to sampling and analysis of the batch. Once analytical results indicate that all parameters are below the permit limits, the batch will be discharged at a rate of approximately 5 gpm. T. R. Miller requested permission to discharge this low volume flow into existing surface drainage on-site as it would be difficult to pump at this low rate through the existing pipe running to Murder Creek. The discharge of the treated process wastewater to on-site drainage would be beneficial as some volume would evaporate or percolate into the ground enroute and any flow that

reached Murder Creek would be fully oxygenated during its transit.
We believe the Department's in-stream calculations and limits were based on this request already, which was in our application and subsequent conversations with ADEM, but the permit itself did not get updated to indicate the DSN 002 discharge would first go to an unnamed tributary to Murder Creek, rather than straight to Murder Creek via a diffuser. Without a UV system, some changes need to be made to some of the parameters. The ADEM loading calculations showed that our present limits are already more stringent than currently required, should a discharge occur.

DSN 002 Changes:

- The continuous recording of pH should be removed as that was a parameter specific to the UV system to ensure it was operating correctly. We propose to monitor pH with a monthly grab sample, or at each batch discharge.

- Parameters with composite sampling frequency should be changed to a grab sample as the automated composite sampling was an old feature of the UV system only:
  - BOD, 5-Day
  - Nitrogen, Ammonia Total (As N)
  - Nitrogen, Kjeldahl (As N)
  - Arsenic, Total Recoverable
  - Chromium, Total Recoverable
  - Copper, Total Recoverable
  - Chemical Oxygen Demand (COD)
  - Toxicity Testing (Quarterly)

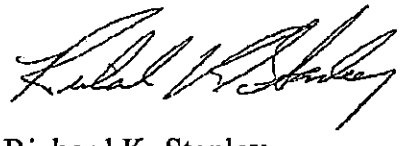
- The following parameters should be removed completely as they were required specifically to monitor the UV system performance only:
  - Length of longest pH excursion
  - Daily excursion time
  - pH Range Excursions, >60 minutes

Finally, we had requested that our monthly 002 DMRs be reported in the eDMR system on a quarterly basis to coincide with our quarterly 002Q sample. In our present permit on Page 9, Section 1b, it is shown as "[monthly] or [quarterly]", but the draft permit has

changed this to "monthly". Quarterly reporting is helpful from an administrative standpoint as we have been required to enter "No Discharge" reports every month for the past 10 years. Aligning this monthly sampling with quarterly reporting in the eDMR system helps with efficiency and minimizing paperwork errors or errors in the eDMR system itself that have occurred from time-to-time.

We appreciate the opportunity to provide our comments to this draft permit. If we can provide any further information or documentation to assist with the evaluation of these comments, please contact me.

Sincerely,



Richard K. Stanley
President and CEO

cc: H. M. Rollins Company, Inc.

File 160.030.013

T. R. MILLER MILL COMPANY, INC.
BREWTON, ALABAMA

NPDES Permit Renewal Application

Prepared By:
H. M. Rollins Company, Inc.
P. O. Box 3471
Gulfport, Mississippi 39505
(228) 832-1738

December 30, 2019

INTRODUCTION

T. R. Miller Mill Company, Inc. (T. R. Miller) operates a wood preserving plant on its site at 215 Deer Street in Brewton, Alabama. The location and layout of the site can be seen in the drawings located in Exhibit 5 of this application. The facility uses the oil-borne wood preservative, pentachlorophenol (penta) and the water-borne preservative chromated copper arsenate (CCA). The preservatives are applied to wood products, primarily utility poles, in pressure retorts at separate plants on the T. R. Miller site.

T. R. Miller's wood preserving operations and NPDES permit have been largely unchanged over the past 10 years. The permit was reissued on April 2, 2010, and June 24, 2015. The current permit expires on June 30, 2020. This permit covers discharges of storm water associated with industrial activity, treated process wastewater from the pentachlorophenol wood preserving operations, and treated groundwater (under the facility's Resource Conservation and Recovery Act (RCRA) Hazardous Waste Post-Closure Permit). No treated groundwater or treated penta process wastewater has been discharged over the past two permit cycles (Outfall 002), only storm water (Outfall 003).

WATER TREATMENT SYSTEM (OUTFALL 002)

The present water treatment system uses physical treatment followed by chemical oxidation to remove the contaminants from the effluent. The system was designed to treat the combined flow of process wastewater from the penta plant and contaminated groundwater. The influent stream is first subjected to oil/water separation and is then chemically oxidized by the use of a very high power ultraviolet light. If the system operated, the effluent would be discharged via an underground pipe that runs to Murder Creek where it would be diffused into the stream. A line drawing of the treatment system

is included in Exhibit 6. Note that there is no process wastewater discharge from the CCA plant, which is prohibited from discharging per 40 CFR Part 429 Subpart F. All process wastewater from the CCA Plant is reused in the process.

Since T. R. Miller is no longer actively recovering groundwater and no penta process wastewater has been treated during the last two permit cycles, this treatment system has not been operated under the present permit; however, the discharge must remain as a permitted and monitored discharge in the event ADEM requires T. R. Miller to restart active groundwater remediation. In 2020, for the upcoming permit renewal, the UV treatment system is being replaced with a system employing activated carbon adsorption as described under Facility Changes and Requested Permit Modifications.

STORM WATER (OUTFALL 003)

Representative storm water discharge from the facility is located at Outfall 003. The location of this outfall may be seen on the drawings in Exhibit 5.

The facility's current permit requires that storm water be monitored on a quarterly and semiannual basis, using only grab samples. As a result, all of the data that is readily available is data from grab samples. Form 2F requests information from composite sampling, but no recent data is available. The facility supplied composite data in the early 1990's as part of the original permit application, and it is not believed that there have been any changes in the operations at the facility since that time which would be expected to increase contaminants in the discharge. Laboratory-confirmed results above the method detection limit, including estimated values, from 2015 through 2019 are reported in this application.

FACILITY CHANGES AND REQUESTED PERMIT MODIFICATIONS

Due to the operational complexity, the inability to handle low volume periodic flows, and the significant maintenance requirements of the present treatment system, T. R. Miller is planning to replace the UV system with a new activated carbon treatment system. This system will be designed to meet present applicable limits and have a batch flow of no more than 1,000 GPD with a flow rate of 5 gpm when process wastewater alone is discharged. The system will have the capacity for higher flows on a continuous basis in the event that ADEM requires a resumption of active groundwater remediation. Process wastewater will be treated in batches, and the treated wastewater will be stored in a tank prior to sampling and analysis of the batch. Once analytical results indicate that all parameters are below the permit limits, the batch will be discharged at a rate of approximately 5 gpm. T. R. Miller is requesting permission to discharge this low volume flow into existing surface drainage on-site as it would be difficult to pump at this low rate through the existing pipe running to Murder Creek. The discharge of the treated process wastewater to on-site drainage would be beneficial as some volume would evaporate or percolate into the ground enroute and any flow that reached Murder Creek would be fully oxygenated during its transit.

The system will be made ready for use in the first half of 2020, and it will be utilized once the permit authorizing the discharge has been reissued. While this system is intended for use on the pentachlorophenol process wastewater, carbon adsorption will also be utilized for treatment of contaminated groundwater should ADEM require active remediation at a future time.

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (ADEM)
NPDES INDIVIDUAL PERMIT APPLICATION
SUPPLEMENTARY INFORMATION FOR INDUSTRIAL FACILITIES

Instructions: This form should be used to submit the required supplementary information for an application for an NPDES individual permit for industrial facilities. The completed application should be submitted to ADEM in duplicate. If insufficient space is available to address any item, please continue on an attached sheet of paper. Please mark "N/A" in the appropriate box when an item is not applicable to the applicant. **Please type or print legibly in blue or black ink.** Mail the completed application to:

ADEM-Water Division
Industrial Section
P O Box 301463
Montgomery, AL 36130-1463

RECEIVED
JAN 03 2020
IND/MUN BRANCH

PURPOSE OF THIS APPLICATION

- ☐ Initial Permit Application for New Facility*
- ☐ Initial Permit Application for Existing Facility*
- ☐ Modification of Existing Permit
- ☒ Reissuance of Existing Permit
- ☐ Revocation & Reissuance of Existing Permit

* *An application for participation in the ADEM's Electronic Environmental (E2) Reporting must be submitted to allow permittee to electronically submit reports as required.*

SECTION A – GENERAL INFORMATION

1. Facility Name: T. R. Miller Mill Company, Inc.

   a. Operator Name: T. R. Miller Mill Company, Inc.

   b. Is the operator identified in A.1.a, the owner of the facility? ☒ Yes ☐ No
   If no, provide name and address of the operator and submit information indicating the operator's scope of responsibility for the facility.

2. NPDES Permit Number: AL 0 0 0 0 7 7 9 (not applicable if initial permit application)

3. SID Permit Number (if applicable): IU ___ ___ - ___ ___ - ___ ___ ___ ___ ___

4. NPDES General Permit Number (if applicable): ALG ___ ___ ___ ___ ___ ___

5. Facility Physical Location: (**Attach a map with location marked; street, route no. or other specific identifier**)
   Street: 215 Deer St.
   City: Brewton County: Escambia State: AL Zip: 36426
   Facility Location (Front Gate): Latitude: 31.104092 Longitude: -87.068021

6. Facility Mailing Address: P. O. Box 708
   City: Brewton County: Escambia State: AL Zip: 36427

7. Responsible Official (as described on the last page of this application):
   Name and Title: Richard K. Stanley
   Address: 215 Deer St.
   City: Brewton State: AL Zip: 36426
   Phone Number: 251-867-4331 Email Address: rks@trmillermill.com

8. Designated Facility Contact:
   Name and Title: David Brittain
   Phone Number: 251-867-4331 Email Address: dbrittain@trmillermill.com

9. Designated Discharge Monitoring Report (DMR) Contact:

Name and Title: David Brittain

Phone Number: 251-867-4331 Email Address: dbrittain@trmillermill.com

10. Type of Business Entity:

☒ Corporation ☐ General Partnership ☐ Limited Partnership ☐ Limited Liability Company ☐ Sole Proprietorship

☐ Other (Please Specify)_____

11. Complete this section if the Applicant's business entity is a Corporation

a) Location of Incorporation:

Address: 215 Deer St.

City: Brewton County: Escambia State: AL Zip: 36426

b) Parent Corporation of Applicant:

Name: N/A

Address:_____

City:_____ State:_____ Zip:_____

c) Subsidiary Corporation(s) of Applicant:

Name: N/A

Address:_____

City:_____ State:_____ Zip:_____

d) Corporate Officers:

Name: Richard K. Stanley

Address: 215 Deer St.

City: Brewton State: AL Zip: 36426

Name:_____

Address:_____

City:_____ State:_____ Zip:_____

e) Agent designated by the corporation for purposes of service:

Name:_____

Address:_____

City:_____ State:_____ Zip:_____

12. If the Applicant's business entity is a Partnership, please list the general partners.

Name:_____ Name:_____

Address:_____ Address:_____

City:_____ State:_____ Zip:_____ City:_____ State:_____ Zip:_____

13. If the Applicant's business entity is a Proprietorship, please enter the proprietor's information.

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

14. Permit numbers for Applicant's previously issued NPDES Permits and identification of any other State of Alabama Environmental Permits presently held by the Applicant, its parent corporation, or subsidiary corporations within the State of Alabama:

Permit Name	Permit Number	Held By
NPDES (Pole Division, Indiv.)	AL0000779	Applicant
NPDES (Lumber Div., General)	ALG060076	Applicant
RCRA/HSWA	ALD008161416	Applicant
Operating Permit	502-S002	Applicant

15. Identify all Administrative Complaints, Notices of Violation, Directives, Administrative Orders, or Litigation concerning water pollution, if any, against the Applicant, its parent corporation or subsidiary corporations within the State of Alabama within the past five years (attach additional sheets if necessary):

Facility Name	Permit Number	Type of Action	Date of Action

SECTION B – BUSINESS ACTIVITY

1. Indicate applicable Standard Industrial Classification (SIC) Codes for all processes. If more than one applies, list in order of importance:

a. 2491

b. 2421

c. _____

d. _____

e. _____

f. _____

2. If your facility conducts or will be conducting any of the processes listed below (regardless of whether they generate wastewater, waste sludge, or hazardous waste), place a check beside the category of business activity (check all that apply):

Industrial Categories

- ☐ Aluminum Forming
- ☐ Asbestos Manufacturing
- ☐ Battery Manufacturing
- ☐ Can Making
- ☐ Canned and Preserved Fruit and Vegetables
- ☐ Canned and Preserved Seafood
- ☐ Cement Manufacturing
- ☐ Centralized Waste Treatment
- ☐ Carbon Black
- ☐ Coal Mining
- ☐ Coil Coating
- ☐ Copper Forming
- ☐ Electric and Electronic Components Manufacturing
- ☐ Electroplating
- ☐ Explosives Manufacturing
- ☐ Feedlots
- ☐ Ferroalloy Manufacturing
- ☐ Fertilizer Manufacturing
- ☐ Foundries (Metal Molding and Casting)
- ☐ Glass Manufacturing
- ☐ Grain Mills
- ☐ Gum and Wood Chemicals Manufacturing
- ☐ Inorganic Chemicals
- ☐ Iron and Steel
- ☐ Leather Tanning and Finishing
- ☐ Metal Finishing
- ☐ Meat Products
- ☐ Metal Molding and Casting
- ☐ Metal Products
- ☐ Nonferrous Metals Forming
- ☐ Nonferrous Metals Manufacturing
- ☐ Oil and Gas Extraction
- ☐ Organic Chemicals Manufacturing
- ☐ Paint and Ink Formulating
- ☐ Paving and Roofing Manufacturing
- ☐ Pesticides Manufacturing
- ☐ Petroleum Refining
- ☐ Phosphate Manufacturing
- ☐ Photographic
- ☐ Pharmaceutical
- ☐ Plastic & Synthetic Materials
- ☐ Plastics Processing Manufacturing
- ☐ Porcelain Enamel
- ☐ Pulp, Paper, and Fiberboard Manufacturing
- ☐ Rubber
- ☐ Soap and Detergent Manufacturing
- ☐ Steam and Electric
- ☐ Sugar Processing
- ☐ Textile Mills
- ☒ Timber Products
- ☐ Transportation Equipment Cleaning
- ☐ Waste Combustion
- ☐ Other (specify)_____

A facility with processes inclusive in these business areas may be covered by Environmental Protection (EPA) categorical standards. These facilities are termed "categorical users" and should skip to question 2 of Section C.

3. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

This facility produces utility poles at two different locations on-site with one plant treating with the oil borne preservative pentachlorophenol and the other plant treating with the water borne preservative chromated copper arsenate (CCA). The facility also has a permitted discharge for groundwater treatment. There are no ELGs associated with the oil borne plant or the groundwater remediation. The water borne operation is subject to a no discharge ELG for PWW.

SECTION C – WASTEWATER DISCHARGE INFORMATION

Facilities that checked activities in B.2 and are considered Categorical Industrial Users should skip to C.2 of this section.

1. **For Non-Categorical Users Only**: Provide wastewater flows for each of the processes or proposed processes. Using the process flow schematic (Figure 1), enter the description that corresponds to each process. **(The flow schematic should include all treatment units as well as monitoring and discharge points).** [New facilities should provide estimates for each discharge.]

Process Description	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5 (gals/day) Monthly Avg. Flow	Discharge Type (batch, continuous, intermittent)

If batch discharge occurs or will occur, indicate: [new facilities may estimate.]

a. Number of batch discharges: _____ per day

b. Average discharge per batch: _____ (GPD)

c. Time of batch discharges _____ (days of week) at _____ (hours of day)

d. Flow rate: _____ gallons/minute

e. Percent of total discharge: _____

Non-Process Discharges (e.g. non-contact cooling water)	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5 (gals/day) Monthly Avg. Flow

2. **Complete this Section only if you are subject to Categorical Standards and plan to directly discharge the associated wastewater to a water of the State.** If Categorical wastewater is discharged exclusively via an indirect discharge to a public or privately-owned treatment works, check "Yes" in the appropriate space below and proceed directly to part 2.c .

☐ Yes

For Categorical Users: Provide the wastewater discharge flows or production (whichever is applicable by the effluent guidelines) for each of your processes or proposed processes. Using the process flow schematic (Figure 1, pg 14), enter the description that corresponds to each process. [New facilities should provide estimates for each discharge.]

2a.

Regulated Process	Applicable Category	Applicable Subpart	Type of Discharge Flow (batch, continuous, intermittent)
Water Borne Wood Treatment	Timber Products	F	No discharge allowed

2b.

Process Description	Last 12 Months (gals/day), (lbs/day), etc. Highest Month Average*	Highest Flow Year of Last 5 (gals/day), (lbs/day), etc. Monthly Average*	Discharge Type (batch, continuous, intermittent)
Wood treatment (Subpart F)	0 - all PWW reused in process	0 - all PWW reused in process	NONE
Wood treatment (production)	246,217 cu.ft./month	189,478 cu.ft./month	

*** Reported values should be expressed in units of the applicable Federal production-based standard. For example, flow (MGD), production (pounds per day), etc.**

If batch discharge occurs or will occur, indicate: [new facilities may estimate.]

a. Number of batch discharges: _____ per day

b. Average discharge per batch: _____ (GPD)

c. Time of batch discharges _____ (days of week) at _____ (hours of day)

d. Flow rate: _____ gallons/minute

e. Percent of total discharge: _____

2c.

Non categorical Process Description	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5. (gals/day) Monthly Avg. Flow	Discharge Type (batch, continuous, intermittent)
groundwater discharge	not currently discharging	not currently discharging	continuous if discharging
Penta PWW	currently inactive	currently inactive	batch if discharging

If batch discharge occurs or will occur, indicate: [new facilities may estimate.]

a. Number of batch discharges: 0-1 per day

b. Average discharge per batch: 1000 (GPD)

c. Time of batch discharges Mon - Fri (days of week) at 8am - 5pm (hours of day)

d. Flow rate: 5 gallons/minute

e. Percent of total discharge: 100

2d.

Non-Process Discharges (e.g. non-contact cooling water)	Last 12 Months (gals/day) Highest Month Avg. Flow	Highest Flow Year of Last 5 (gals/day) Monthly Avg. Flow
stormwater		

All Applicants must complete C.3 – C.6.

3. Do you share an outfall with another facility? ☐ Yes ■ No (If no, continue to C.4)

For each shared outfall, provide the following:

Applicant's Outfall No.	Name of Other Permittee/Facility	NPDES Permit No.	Where is sample collected by Applicant?

4. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current:	Flow Metering	■ Yes	☐ No	☐ N/A
	Sampling Equipment	■ Yes	☐ No	☐ N/A
Planned:	Flow Metering	☐ Yes	■ No	☐ N/A
	Sampling Equipment	☐ Yes	■ No	☐ N/A

If so, please attach a schematic diagram of the sewer system indicating the present or future location of this equipment and describe the equipment below:

Some flow and limited sampling equipment are located on the UV system however treated groundwater and process waste water is not presently being discharged so this equipment has not been used since before the prior renewal.

5. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics?
■ Yes ☐ No (If no, continue to C.6)

Briefly describe these changes and their anticipated effects on the wastewater volume and characteristics:

Facility is planning to move to an activated carbon system which has lower maintenance costs, easier upkeep, and provides equivalent or better treatment than the present UV system.

6. List the trade name and chemical composition of all biocides and corrosion inhibitors used:

Trade Name	Chemical Composition

For each biocide and/or corrosion inhibitor used, please include the following information:

(1) 96-hour median tolerance limit data for organisms representative of the biota of the waterway into which the discharge will ultimately reach,
(2) quantities to be used,
(3) frequencies of use,
(4) proposed discharge concentrations, and
(5) EPA registration number, if applicable

SECTION D – WATER SUPPLY

Water Sources (check as many as are applicable):

☐ Private Well ☐ Surface Water

☒ Municipal Water Utility (Specify City): ☐ Other (Specify): _____

IF MORE THAN ONE WELL OR SURFACE INTAKE, PROVIDE DATA FOR EACH ON AN ATTACHMENT

City: .01 MGD* Well: _____ MGD* Well Depth: _____ Ft. Latitude: _____ Longitude: _____

Surface Intake Volume: _____ MGD* Intake Elevation in Relation to Bottom: _____ Ft.

Intake Elevation: _____ Ft. Latitude: _____ Longitude: _____

Name of Surface Water Source: _____

*** MGD – Million Gallons per Day**

Cooling Water Intake Structure Information

Complete D.1 and D.2 if your water supply is provided by an outside source and not by an onsite water intake structure? (e.g., another industry, municipality, etc...)

1. Does the provider of your source water operate a surface water intake? Yes ☐ No ☐
   (If yes, continue, if no, go to Section E.)

   a) Name of Provider: City of Brewton b) Location of Provider: Brewton AL

   c) Latitude: _____ Longitude: _____

2. Is the provider a public water system (defined as a system which provides water to the public for human consumption or which provides only treated water, not raw water)? ☒ Yes ☐ No (If yes, go to Section E, if no, continue.)

Only to be completed if you have a cooling water intake structure or the provider of your water supply uses an intake structure and does not treat the raw water.

3. Is any water withdrawn from the source water used for cooling? ☐ Yes ☐ No

4. Using the average monthly measurements over any 12-month period, approximately what percentage of water withdrawn is used exclusively for cooling purposes? _____%

5. Does the cooling water consist of treated effluent that would otherwise be discharged? ☐ Yes ☐ No
   (If yes, go to Section E, if no, complete D.6 – D.17)

6. a. Is the cooling water used in a once-through cooling system? ☐ Yes ☐ No

   b. Is the cooling water used in a closed cycle cooling system? ☐ Yes ☐ No

7. When was the intake installed? _____
(Please provide dates for all major construction/installation of intake components including screens)

8. What is the maximum intake volume? _____
(maximum pumping capacity in gallons per day)

9. What is the average intake volume? _____
(average intake pump rate in gallons per day average in any 30-day period)

10. What is the actual intake flow (AIF) as defined in 40 CFR §125.92(a)? _____MGD

11. How is the intake operated? (e.g., continuously, intermittently, batch) _____

12. What is the mesh size of the screen on your intake?_____

13. What is the intake screen flow-through area?_____

14. What is the through-screen design intake flow velocity? _____ft/sec

15. What is the through-screen actual velocity (in ft/sec)? _____ft/sec

16. What is the mechanism for cleaning the screen? (e.g., does it rotate for cleaning) _____

17. Do you have any additional fish detraction technology on your intake? ☐ Yes ☐ No

18. Have there been any studies to determine the impact of the intake on aquatic organisms? ☐ Yes ☐ No (If yes, please provide.)

19. Attach a site map showing the location of the water intake in relation to the facility, shoreline, water depth, etc.

SECTION E – WASTE STORAGE AND DISPOSAL INFORMATION

Provide a description of the location of all sites involved in the storage of solids or liquids that could be accidentally discharged to a water of the state, either directly or indirectly via such avenues as storm water drainage, municipal wastewater systems, etc., which are located at the facility for which the NPDES application is being made. Where possible, the location should be noted on a map and included with this application:

Description of Waste	Description of Storage Location
K001, F032, F035	Drums in wood preserving process area, drip pads
Petroleum products	Maintenance areas

Provide a description of the location of the ultimate disposal sites of solid or liquid waste by-products (such as sludges) from any wastewater treatment system located at the facility.

Description of Waste	Quantity (lbs/day)	Disposal Method*
K001, F032, F035	0-100	Off-site treatment

***Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site. If any wastes are sent to an off-site centralized waste treatment facility, identify the waste and the facility.**

SECTION F – COASTAL ZONE INFORMATION

Is the discharge(s) located within the 10-foot elevation contour and within the limits of Mobile or Baldwin County? ☐ Yes ■ No

If yes, complete items F.1 – F.12:

	Yes	No
1. Does the project require new construction?	☐	☐
2. Will the project be a source of new air emissions?	☐	☐

		Yes	No
3.	Does the project involve dredging and/or filling of a wetland area or water way?	☐	☐
	If Yes, has the Corps of Engineers (COE) permit been received?	☐	☐
	COE Project No. _____		
4.	Does the project involve wetlands and/or submersed grassbeds?	☐	☐
5.	Are oyster reefs located near the project site?	☐	☐
	If Yes, include a map showing project and discharge location with respect to oyster reefs		
6.	Does the project involve the site development, construction and operation of an energy facility as defined in ADEM Admin. Code r. 335-8-1-.02(bb)?	☐	☐
7.	Does the project involve mitigation of shoreline or coastal area erosion?	☐	☐
8.	Does the project involve construction on beaches or dune areas?	☐	☐
9.	Will the project interfere with public access to coastal waters?	☐	☐
10.	Does the project lie within the 100-year floodplain?	☐	☐
11.	Does the project involve the registration, sale, use, or application of pesticides?	☐	☐
12.	Does the project propose or require construction of a new well or to alter an existing groundwater well to pump more than 50 gallons per day (GPD)?	☐	☐
	If yes, has the applicable permit for groundwater recovery or for groundwater well installation been obtained?	☐	☐

SECTION G – ANTI-DEGRADATION EVALUATION

In accordance with 40 CFR §131.12 and the ADEM Admin. Code r. 335-6-10-.04 for anti-degradation, the following information must be provided, if applicable. It is the applicant's responsibility to demonstrate the social and economic importance of the proposed activity. If further information is required to make this demonstration, attach additional sheets to the application.

1. Is this a new or increased discharge that began after April 3, 1991? ☐ Yes ■ No
   If yes, complete G.2 below. If no, go to Section H.

2. Has an Anti-Degradation Analysis been previously conducted and submitted to the Department for the new or increased discharge referenced in G.1? ☐ Yes ☐ No

   If yes, do not complete this section. If no, and the discharge is to a Tier II waterbody as defined in ADEM Admin. Code r. 335-6-10-.12(4), complete G.2.A – G.2.F below and ADEM Forms 311 and 313 (attached). ADEM Form 313 must be provided for each alternative considered technically viable.

   Information required for new or increased discharges to high quality waters:

   A. What environmental or public health problem will the discharger be correcting?

   _____

   B. How much will the discharger be increasing employment (at its existing facility or as the result of locating a new facility)?

   _____

   C. How much reduction in employment will the discharger be avoiding?

   _____

   D. How much additional state or local taxes will the discharger be paying?

   _____

   E. What public service to the community will the discharger be providing?

   _____

   F. What economic or social benefit will the discharger be providing to the community?

   _____

SECTION H – EPA Application Forms

All Applicants must submit EPA permit application forms. More than one application form may be required from a facility depending on the number and types of discharges or outfalls found. The EPA application forms are found on the Department's website at http://www.adem.alabama.gov/programs/water/waterforms.cnt . The EPA application forms must be submitted in duplicate as follows:

1. All applicants must submit Form 1.
2. Applicants for existing industrial facilities (including manufacturing facilities, commercial facilities, mining activities, and silvicultural activities) which discharge process wastewater must submit Form 2C.
3. Applicants for new industrial facilities which propose to discharge process wastewater must submit Form 2D.
4. Applicants for new and existing industrial facilities which discharge only non-process wastewater (i.e., non-contact cooling water and/or sanitary wastewater) must submit Form 2E.
5. Applicants for new and existing facilities whose discharge is composed entirely of storm water associated with industrial activity must submit Form 2F, unless exempted by § 122.26(c)(1)(ii). If the discharge is composed of storm water and non-storm water, the applicant must also submit Forms 2C, 2D, and/or 2E, as appropriate (in addition to Form 2F).

SECTION I – ENGINEERING REPORT/BMP PLAN REQUIREMENTS

See ADEM 335-6-6-.08(i) & (j)

SECTION J– RECEIVING WATERS

Outfall No.	Receiving Water(s)	303(d) Segment?	Included in TMDL?*
All	Murder Creek	☐ Yes ■ No	☐ Yes ■ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No
		☐ Yes ☐ No	☐ Yes ☐ No

*If a TMDL Compliance Schedule is requested, the following should be attached as supporting documentation:

(1) Justification for the requested Compliance Schedule (e.g. time for design and installation of control equipment, etc.);

(2) Monitoring results for the pollutant(s) of concern which have not previously been submitted to the Department (sample collection dates, analytical results (mass and concentration), methods utilized, MDL/ML, etc. should be submitted as available);

(3) Requested interim limitations, if applicable;

(4) Date of final compliance with the TMDL limitations; and,

(5) Any other additional information available to support requested compliance schedule.

SECTION K – APPLICATION CERTIFICATION

The information contained in this form must be certified by a responsible official as defined in ADEM Administrative Code r. 335-6-6-.09 "signatories to permit applications and reports" (see below).

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

Signature of Responsible Official: _____ Date Signed: 12/31/19

Name and Title: Richard K. Stanley, President & CEO

If the Responsible Official signing this application is <u>not</u> identified in Section A.7, provide the following information:

Mailing Address: _____

City: _____ State: _____ Zip: _____

Phone Number: _____ Email Address: _____

335-6-6-.09 SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS.

(1) The application for an NPDES permit shall be signed by a responsible official, as indicated below:

(a) In the case of a corporation, by a principal executive officer of at least the level of vice president, or a manager assigned or delegated in accordance with corporate procedures, with such delegation submitted in writing if required by the Department, who is responsible for manufacturing, production, or operating facilities and is authorized to make management decisions which govern the operation of the regulated facility;

(b) In the case of a partnership, by a general partner;

(c) In the case of a sole proprietorship, by the proprietor; or

(d) In the case of a municipal, state, federal, or other public entity, by either a principal executive officer, or ranking elected official.

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

Form 1 NPDES

EPA

U.S. Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater

GENERAL INFORMATION

SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(f) and (f)(1))

Activities Requiring an NPDES Permit

1.1 Applicants *Not Required* to Submit Form 1

1.1.1	Is the facility a new or existing **publicly owned treatment works**? If yes, STOP. Do NOT complete Form 1. Complete Form 2A. ☑ No	1.1.2	Is the facility a new or existing **treatment works treating domestic sewage**? If yes, STOP. Do NOT complete Form 1. Complete Form 2S. ☑ No

1.2 Applicants *Required* to Submit Form 1

1.2.1	Is the facility a **concentrated animal feeding operation** or a **concentrated aquatic animal production facility?** ☐ Yes → Complete Form 1 ***and*** Form 2B. ☑ No	1.2.2	Is the facility an **existing** manufacturing, commercial, mining, or silvicultural **facility** that **is currently discharging process wastewater?** ☑ Yes → Complete Form 1 ***and*** Form 2C. ☐ No
1.2.3	Is the facility a **new** manufacturing, commercial, mining, or silvicultural **facility** that has **not yet commenced to discharge**? ☐ Yes → Complete Form 1 ***and*** Form 2D. ☑ No	1.2.4	Is the facility a **new or existing** manufacturing, commercial, mining, or silvicultural **facility** that **discharges only nonprocess wastewater?** ☐ Yes → Complete Form 1 ***and*** Form 2E. ☑ No
1.2.5	Is the facility a **new or existing facility** whose discharge is composed entirely of **stormwater associated with industrial activity** or whose discharge is composed of **both stormwater and non-stormwater**? ☑ Yes → Complete Form 1 ***and*** Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). ☐ No		

SECTION 2. NAME, MAILING ADDRESS, AND LOCATION (40 CFR 122.21(f)(2))

Name, Mailing Address, and Location

2.1 Facility Name

T. R. Miller Mill Company, Inc.

2.2 EPA Identification Number

ALD008161416

2.3 Facility Contact

Name (first and last)	Title	Phone number
David Brittain	Environmental and Safety Manager	(251) 867-4331

Email address
dbrittain@trmillermill.com

2.4 Facility Mailing Address

Street or P.O. box
P. O. Box 708

City or town	State	ZIP code
Brewton	AL	36427

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

Name, Mailing Address, and Location Continued

2.5 Facility Location		
Street, route number, or other specific identifier 215 Deer St.		
County name Escambia	County code (if known)	
City or town Brewton	State AL	ZIP code 36426

SECTION 3. SIC AND NAICS CODES (40 CFR 122.21(f)(3))

SIC and NAICS Codes

3.1 SIC Code(s)	Description (optional)
2491	Wood Preserving
2421	Sawmills

3.2 NAICS Code(s)	Description (optional)
321114	Wood Preserving
321113	Sawmills

SECTION 4. OPERATOR INFORMATION (40 CFR 122.21(f)(4))

Operator Information

4.1 Name of Operator

T. R. Miller Mill Company, Inc.

4.2 Is the name you listed in Item 4.1 also the owner?

☑ Yes ☐ No

4.3 Operator Status

☐ Public—federal ☐ Public—state ☐ Other public (specify)_____

☑ Private ☐ Other (specify) _____

4.4 Phone Number of Operator

(251) 867-4331

Operator Information Continued

4.5 Operator Address

Street or P.O. Box P. O. Box 708		
City or town Brewton	State AL	ZIP code 36427
Email address of operator dbrittain@trmillermill.com		

SECTION 5. INDIAN LAND (40 CFR 122.21(f)(5))

Indian Land

5.1 Is the facility located on Indian Land?

☐ Yes ☑ No

SECTION 6. EXISTING ENVIRONMENTAL PERMITS (40 CFR 122.21(f)(6))

Existing Environmental Permits

6.1 **Existing Environmental Permits** (check all that apply and print or type the corresponding permit number for each)

☑ NPDES (discharges to surface water) AL0000779	☑ RCRA (hazardous wastes) ALD008161416	☐ UIC (underground injection of fluids)
☑ PSD (air emissions) 502-S002	☐ Nonattainment program (CAA)	☐ NESHAPs (CAA)
☐ Ocean dumping (MPRSA)	☐ Dredge or fill (CWA Section 404)	☐ Other (specify)

SECTION 7. MAP (40 CFR 122.21(f)(7))

Map

7.1 Have you attached a topographic map containing all required information to this application? (See instructions for specific requirements.)

☑ Yes ☐ No ☐ CAFO—Not Applicable (See requirements in Form 2B.)

SECTION 8. NATURE OF BUSINESS (40 CFR 122.21(f)(8))

Nature of Business

8.1 Describe the nature of your business.

T. R. Miller Mill Company, Inc. operates a wood preserving operation and a sawmill in Brewton AL. The wood preserving operation (designated the Pole Division) is physically separate from the sawmill (designated the Lumber Division), and the sawmill operates under its own General NPDES permit. The Pole Division maintains a separate Individual NPDES permit and is the subject of this renewal application. The Pole Division produces pressure-treated wood products with either Pentachlorophenol or Chromated Copper Arsenate (CCA), primarily utility poles. This operation involves bringing in raw timber, debarking, peeling, drying in pole kilns, and then pressure treating. Finished poles are stored onsite until sold/shipped to customers.

SECTION 9. COOLING WATER INTAKE STRUCTURES (40 CFR 122.21(f)(9))

Cooling Water Intake Structures

9.1 Does your facility use cooling water?

☐ Yes ☑ No ➔ SKIP to Item 10.1.

9.2 Identify the source of cooling water. (Note that facilities that use a cooling water intake structure as described at 40 CFR 125, Subparts I and J may have additional application requirements at 40 CFR 122.21(r). Consult with your NPDES permitting authority to determine what specific information needs to be submitted and when.)

SECTION 10. VARIANCE REQUESTS (40 CFR 122.21(f)(10))

Variance Requests

10.1 Do you intend to request or renew one or more of the variances authorized at 40 CFR 122.21(m)? (Check all that apply. Consult with your NPDES permitting authority to determine what information needs to be submitted and when.)

☐ Fundamentally different factors (CWA Section 301(n))	☐ Water quality related effluent limitations (CWA Section 302(b)(2))
☐ Non-conventional pollutants (CWA Section 301(c) and (g))	☐ Thermal discharges (CWA Section 316(a))
☑ Not applicable	

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

SECTION 11. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

11.1 In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.

Column 1	Column 2
☑ Section 1: Activities Requiring an NPDES Permit	☐ w/ attachments
☑ Section 2: Name, Mailing Address, and Location	☐ w/ attachments
☑ Section 3: SIC Codes	☐ w/ attachments
☑ Section 4: Operator Information	☐ w/ attachments
☑ Section 5: Indian Land	☐ w/ attachments
☑ Section 6: Existing Environmental Permits	☐ w/ attachments
☑ Section 7: Map	☑ w/ topographic map ☐ w/ additional attachments
☑ Section 8: Nature of Business	☐ w/ attachments
☐ Section 9: Cooling Water Intake Structures	☐ w/ attachments
☐ Section 10: Variance Requests	☐ w/ attachments
☑ Section 11: Checklist and Certification Statement	☐ w/ attachments

11.2 **Certification Statement**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Richard K. Stanley	President & CEO
Signature: Richard K. Stanley	Date signed: 12/31/19

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

Form 2C NPDES

EPA

U.S. Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater
EXISTING MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURE OPERATIONS

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1))

Outfall Location

1.1 Provide information on each of the facility's outfalls in the table below.

Outfall Number	Receiving Water Name	Latitude	Longitude
002	Murder Creek	31° 06′ 28″ N	87° 03′ 13″ W
	002 Sample Location	31° 06′ 39.75″ N	87° 03′ 21.75″ W
		° ′ ″	° ′ ″

SECTION 2. LINE DRAWING (40 CFR 122.21(g)(2))

Line Drawing

2.1 Have you attached a line drawing to this application that shows the water flow through your facility with a water balance? (See instructions for drawing requirements. See Exhibit 2C–1 at end of instructions for example.)

☑ Yes ☐ No

SECTION 3. AVERAGE FLOWS AND TREATMENT (40 CFR 122.21(g)(3))

Average Flows and Treatment

3.1 For each outfall identified under Item 1.1, provide average flow and treatment information. Add additional sheets if necessary.

****Outfall Number**** 002

Operations Contributing to Flow

Operation	Average Flow
Estimated Groundwater Recovery, if Discharging	0.0061 mgd
Estimated Penta Process Wastewater, if Discharging	0.0005 mgd
NOTE: No discharges in past 10 years	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
Oil/Water Separator	1-U	Offsite disposal
UV Oxidation(SD Jun2020)/Carbon Adsorption(SU Jun2020)	2-B / 2-A	Offsite disposal
Discharge to Murder Creek	4-A	NA

Average Flows and Treatment Continued

3.1 cont.

****Outfall Number**** _____

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge

****Outfall Number**** _____

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge

System Users

3.2 Are you applying for an NPDES permit to operate a privately owned treatment works?

☐ Yes ☑ No ➔ SKIP to Section 4.

3.3 Have you attached a list that identifies each user of the treatment works?

☐ Yes ☐ No

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

SECTION 4. INTERMITTENT FLOWS (40 CFR 122.21(g)(4))

Intermittent Flows

4.1 Except for storm runoff, leaks, or spills, are any discharges described in Sections 1 and 3 intermittent or seasonal?

☑ Yes ☐ No ➔ SKIP to Section 5.

4.2 Provide information on intermittent or seasonal flows for each applicable outfall. Attach additional pages, if necessary.

Outfall Number	Operation (list)	Frequency		Flow Rate		Duration
		Average Days/Week	Average Months/Year	Long-Term Average	Maximum Daily	
002	Recovered GW	7 days/week	12 months/year	0.0061 mgd	0.0152 mgd	days
	Penta Process WW	5 days/week	12 months/year	0.0005 mgd	0.0010 mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days

SECTION 5. PRODUCTION (40 CFR 122.21(g)(5))

Applicable ELGs

5.1 Do any effluent limitation guidelines (ELGs) promulgated by EPA under Section 304 of the CWA apply to your facility?

☑ Yes ☐ No ➔ SKIP to Section 6.

5.2 Provide the following information on applicable ELGs.

ELG Category	ELG Subcategory	Regulatory Citation
Timber Products Processing	Wood Preserving - Water Borne (no discharge)	40 CFR Part 429 Subpart F

Production-Based Limitations

5.3 Are any of the applicable ELGs expressed in terms of production (or other measure of operation)?

☐ Yes ☑ No ➔ SKIP to Section 6.

5.4 Provide an actual measure of daily production expressed in terms and units of applicable ELGs.

Outfall Number	Operation, Product, or Material	Quantity per Day	Unit of Measure
	Note: There is no discharge of PWW from the Water Borne		
	treatment, this renewal is for the existing Penta PWW (No ELG)		
	(Oil Borne, no steam or Boulton) and the groundwater recovery		

SECTION 6. IMPROVEMENTS (40 CFR 122.21(g)(6))

Upgrades and Improvements

6.1 Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?

☐ Yes ☑ No ➔ SKIP to Item 6.3.

6.2 Briefly identify each applicable project in the table below.

Brief Identification and Description of Project	Affected Outfalls (list outfall number)	Source(s) of Discharge	Final Compliance Dates	
			Required	Projected

6.3 Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? *(optional item)*

☑ Yes ☐ No ☐ Not applicable

SECTION 7. EFFLUENT AND INTAKE CHARACTERISTICS (40 CFR 122.21(g)(7))

Effluent and Intake Characteristics

See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.

Table A. Conventional and Non-Conventional Pollutants

7.1 Are you requesting a waiver from your NPDES permitting authority for one or more of the Table A pollutants for any of your outfalls?

☐ Yes ☑ No ➔ SKIP to Item 7.3.

7.2 If yes, indicate the applicable outfalls below. Attach waiver request and other required information to the application.

Outfall Number _____ Outfall Number _____ Outfall Number _____

7.3 Have you completed monitoring for all Table A pollutants at each of your outfalls for which a waiver has not been requested and attached the results to this application package?

☑ Yes ☐ No; a waiver has been requested from my NPDES permitting authority for all pollutants at all outfalls.

Table B. Toxic Metals, Cyanide, Total Phenols, and Organic Toxic Pollutants

7.4 Do any of the facility's processes that contribute wastewater fall into one or more of the primary industry categories listed in Exhibit 2C-3? (See end of instructions for exhibit.)

☐ Yes ☑ No ➔ SKIP to Item 7.8.

7.5 Have you checked "Testing Required" for all toxic metals, cyanide, and total phenols in Section 1 of Table B?

☐ Yes ☐ No

7.6 List the applicable primary industry categories and check the boxes indicating the required GC/MS fraction(s) identified in Exhibit 2C-3.

Primary Industry Category	Required GC/MS Fraction(s) (Check applicable boxes.)			
	☐ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide
	☐ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide
	☐ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide

Effluent and Intake Characteristics Continued

7.7	Have you checked "Testing Required" for all required pollutants in Sections 2 through 5 of Table B for each of the GC/MS fractions checked in Item 7.6? ☐ Yes ☐ No
7.8	Have you checked "Believed Present" or "Believed Absent" for all pollutants listed in Sections 1 through 5 of Table B where testing is not required? ☑ Yes ☐ No
7.9	Have you provided (1) quantitative data for those Section 1, Table B, pollutants for which you have indicated testing is required or (2) quantitative data or other required information for those Section 1, Table B, pollutants that you have indicated are "Believed Present" in your discharge? ☑ Yes ☐ No
7.10	Does the applicant qualify for a small business exemption under the criteria specified in the instructions? ☐ Yes ➔ Note that you qualify at the top of Table B, then SKIP to Item 7.12. ☑ No
7.11	Have you provided (1) quantitative data for those Sections 2 through 5, Table B, pollutants for which you have determined testing is required or (2) quantitative data or an explanation for those Sections 2 through 5, Table B, pollutants you have indicated are "Believed Present" in your discharge? ☑ Yes ☐ No
Table C. Certain Conventional and Non-Conventional Pollutants	
7.12	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed on Table C for all outfalls? ☑ Yes ☐ No
7.13	Have you completed Table C by providing (1) quantitative data for those pollutants that are limited either directly or indirectly in an ELG and/or (2) quantitative data or an explanation for those pollutants for which you have indicated "Believed Present"? ☑ Yes ☐ No
Table D. Certain Hazardous Substances and Asbestos	
7.14	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed in Table D for all outfalls? ☑ Yes ☐ No
7.15	Have you completed Table D by (1) describing the reasons the applicable pollutants are expected to be discharged and (2) by providing quantitative data, if available? ☑ Yes ☐ No
Table E. 2,3,7,8-Tetrachlorodibenzo-p-Dioxin (2,3,7,8-TCDD)	
7.16	Does the facility use or manufacture one or more of the 2,3,7,8-TCDD congeners listed in the instructions, or do you know or have reason to believe that TCDD is or may be present in the effluent? ☐ Yes ➔ Complete Table E. ☑ No ➔ SKIP to Section 8.
7.17	Have you completed Table E by reporting *qualitative* data for TCDD? ☐ Yes ☐ No

SECTION 8. USED OR MANUFACTURED TOXICS (40 CFR 122.21(g)(9))

Used or Manufactured Toxics

8.1	Is any pollutant listed in Table B a substance or a component of a substance used or manufactured at your facility as an intermediate or final product or byproduct? ☑ Yes ☐ No ➔ SKIP to Section 9.
8.2	List the pollutants below. 1. Arsenic 4. Naphthalene 7. Hexachlorobenzene 2. Chromium 5. Pentachlorophenol 8. 3. Copper 6. 2-4-6 Trichlorophenol 9.

SECTION 9. BIOLOGICAL TOXICITY TESTS (40 CFR 122.21(g)(11))

Biological Toxicity Tests

9.1 Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made within the last three years on (1) any of your discharges or (2) on a receiving water in relation to your discharge?

☐ Yes ☑ No ➔ SKIP to Section 10.

9.2 Identify the tests and their purposes below.

Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

SECTION 10. CONTRACT ANALYSES (40 CFR 122.21(g)(12))

Contract Analyses

10.1 Were any of the analyses reported in Section 7 performed by a contract laboratory or consulting firm?

☑ Yes ☐ No ➔ SKIP to Section 11.

10.2 Provide information for each contract laboratory or consulting firm below.

	Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
Name of laboratory/firm	Micro-Methods Inc. (historic data from previous discharges)	Test America (historic data from previous discharges)	
Laboratory address	6500 Sunplex Dr. Ocean Springs MS 39564	3355 McLemore Dr. Pensacola, FL 32514	
Phone number	(228) 875-6420	(850) 474-1001	
Pollutant(s) analyzed	VOC, TSS, TOC, Cyanide, most metals, Pesticides, Barium, Iron, Magnesium, Manganese Note: there has been no discharge in past 10 years.	BOD, COD, Ammonia, O&G, Total Phenols, Arsenic, Chromium, Acids, Base/ Neutrals Note: there has been no discharge in past 10 years.	

SECTION 11. ADDITIONAL INFORMATION (40 CFR 122.21(g)(13))

Additional Information

11.1 Has the NPDES permitting authority requested additional information?

☐ Yes ☑ No ➔ SKIP to Section 12.

11.2 List the information requested and attach it to this application.

1.	4.
2.	5.
3.	6.

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

SECTION 12. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

12.1 In Column 1 below, mark the sections of Form 2C that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.

Column 1	Column 2	
☑ Section 1: Outfall Location	☑ w/ attachments	
☑ Section 2: Line Drawing	☑ w/ line drawing	☐ w/ additional attachments
☑ Section 3: Average Flows and Treatment	☐ w/ attachments	☐ w/ list of each user of privately owned treatment works
☑ Section 4: Intermittent Flows	☐ w/ attachments	
☑ Section 5: Production	☐ w/ attachments	
☑ Section 6: Improvements	☑ w/ attachments	☑ w/ optional additional sheets describing any additional pollution control plans
☑ Section 7: Effluent and Intake Characteristics	☐ w/ request for a waiver and supporting information ☐ w/ small business exemption request ☑ w/ Table A ☑ w/ Table C ☑ w/ Table E	☐ w/ explanation for identical outfalls ☐ w/ other attachments ☑ w/ Table B ☑ w/ Table D ☐ w/ analytical results as an attachment
☑ Section 8: Used or Manufactured Toxics	☐ w/ attachments	
☐ Section 9: Biological Toxicity Tests	☐ w/ attachments	
☑ Section 10: Contract Analyses	☐ w/ attachments	
☑ Section 11: Additional Information	☐ w/ attachments	
☑ Section 12: Checklist and Certification Statement	☐ w/ attachments	

12.2 **Certification Statement**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Richard K. Stanley	President & CEO
Signature: Richard K. Stanley	Date signed: 12/31/19

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...entification Number	NPDES Permit Number	Facility N...	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approve... ...19
OMB No. 2040-0004

TABLE A. CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(iii)).[1]

	Pollutant	Waiver Requested (if applicable)	Units (specify)		Effluent: Maximum Daily Discharge (required)	Effluent: Maximum Monthly Discharge (if available)	Effluent: Long-Term Average Daily Discharge (if available)	Effluent: Number of Analyses	Intake (Optional): Long-Term Average Value	Intake (Optional): Number of Analyses
☐	Check here if you have applied to your NPDES permitting authority for a waiver for *all* of the pollutants listed on this table for the noted outfall.									
1.	Biochemical oxygen demand (BOD_5)	☐	Concentration	mg/l	hist: 60		hist: 13.6	26		
			Mass	lb/day	hist: 8.1		hist: 0.75			
2.	Chemical oxygen demand (COD)	☐	Concentration	mg/l	hist: 54		hist: 20.7	26		
			Mass	lb/day	hist: 7.3		hist: 1.14			
3.	Total organic carbon (TOC)	☐	Concentration	mg/l	hist: 5.38			1		
			Mass	lb/day	hist: 0.7					
4.	Total suspended solids (TSS)	☐	Concentration	mg/l	hist: 2			1		
			Mass	lb/day	hist: 0.3					
5.	Ammonia (as N)	☐	Concentration	mg/l	hist: 0.53		hist: 0.2	26		
			Mass	lb/day	hist: 0.1		hist: 0.01			
6.	Flow	☐	Rate	MGD	hist: 0.0162		hist: 0.0066	daily		
7.	Temperature (winter)	☐	°C	°C	hist: 18			1		
	Temperature (summer)	☐	°C	°C	hist: 28			1		
8.	pH (minimum)	☐	Standard units	s.u.	hist: 6.2			daily		
	pH (maximum)	☐	Standard units	s.u.	hist: 8.7			daily		

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you qualify as a small business per the instructions to Form 2C and, therefore, do not need to submit quantitative data for any of the organic toxic pollutants in Sections 2 through 5 of this table. Note, however, that you must still indicate in the appropriate column of this table if you believe any of the pollutants listed are present in your discharge.											
Section 1. Toxic Metals, Cyanide, and Total Phenols												
1.1	Antimony, total (7440-36-0)	☐	☐	☑	Concentration							
					Mass							
1.2	Arsenic, total (7440-38-2)	☐	☑	☐	Concentration	mg/l	hist: 0.0051		hist: 0.0027	13		
					Mass	lb/day	hist: 0.001		hist: 0.00015			
1.3	Beryllium, total (7440-41-7)	☐	☐	☑	Concentration							
					Mass							
1.4	Cadmium, total (7440-43-9)	☐	☐	☑	Concentration							
					Mass							
1.5	Chromium, total (7440-47-3)	☐	☑	☐	Concentration	mg/l	hist: 0.006		hist: 0.003	13		
					Mass	lb/day	hist: 0.001		hist: 0.00017			
1.6	Copper, total (7440-50-8)	☐	☑	☐	Concentration	mg/l	hist: 0.29		hist: 0.0392	13		
					Mass	lb/day	hist: 0.04		hist: 0.00216			
1.7	Lead, total (7439-92-1)	☐	☐	☑	Concentration							
					Mass							
1.8	Mercury, total (7439-97-6)	☐	☐	☑	Concentration							
					Mass							
1.9	Nickel, total (7440-02-0)	☐	☐	☑	Concentration							
					Mass							
1.10	Selenium, total (7782-49-2)	☐	☐	☑	Concentration							
					Mass							
1.11	Silver, total (7440-22-4)	☐	☐	☑	Concentration							
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
1.12	Thallium, total (7440-28-0)	☐	☐	☑	Concentration							
					Mass							
1.13	Zinc, total (7440-66-6)	☐	☐	☑	Concentration							
					Mass							
1.14	Cyanide, total (57-12-5)	☐	☐	☑	Concentration							
					Mass							
1.15	Phenols, total	☐	☑	☐	Concentration	mg/l	hist: 0.0087		hist: 0.004	26		
					Mass	lb/day	hist: 0.001		hist: 0.00022			
Section 2. Organic Toxic Pollutants (GC/MS Fraction—Volatile Compounds)												
2.1	Acrolein (107-02-8)	☐	☐	☑	Concentration							
					Mass							
2.2	Acrylonitrile (107-13-1)	☐	☐	☑	Concentration							
					Mass							
2.3	Benzene (71-43-2)	☐	☐	☑	Concentration							
					Mass							
2.4	Bromoform (75-25-2)	☐	☐	☑	Concentration							
					Mass							
2.5	Carbon tetrachloride (56-23-5)	☐	☐	☑	Concentration							
					Mass							
2.6	Chlorobenzene (108-90-7)	☐	☐	☑	Concentration							
					Mass							
2.7	Chlorodibromomethane (124-48-1)	☐	☐	☑	Concentration							
					Mass							
2.8	Chloroethane (75-00-3)	☐	☐	☑	Concentration							
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.9	2-chloroethylvinyl ether (110-75-8)	☐	☐	☑	Concentration							
					Mass							
2.10	Chloroform (67-66-3)	☐	☐	☑	Concentration							
					Mass							
2.11	Dichlorobromomethane (75-27-4)	☐	☐	☑	Concentration							
					Mass							
2.12	1,1-dichloroethane (75-34-3)	☐	☐	☑	Concentration							
					Mass							
2.13	1,2-dichloroethane (107-06-2)	☐	☐	☑	Concentration							
					Mass							
2.14	1,1-dichloroethylene (75-35-4)	☐	☐	☑	Concentration							
					Mass							
2.15	1,2-dichloropropane (78-87-5)	☐	☐	☑	Concentration							
					Mass							
2.16	1,3-dichloropropylene (542-75-6)	☐	☐	☑	Concentration							
					Mass							
2.17	Ethylbenzene (100-41-4)	☐	☐	☑	Concentration							
					Mass							
2.18	Methyl bromide (74-83-9)	☐	☐	☑	Concentration							
					Mass							
2.19	Methyl chloride (74-87-3)	☐	☐	☑	Concentration							
					Mass							
2.20	Methylene chloride (75-09-2)	☐	☐	☑	Concentration							
					Mass							
2.21	1,1,2,2- tetrachloroethane (79-34-5)	☐	☐	☑	Concentration							
					Mass							

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.22	Tetrachloroethylene (127-18-4)	☐	☐	☑	Concentration							
					Mass							
2.23	Toluene (108-88-3)	☐	☐	☑	Concentration							
					Mass							
2.24	1,2-trans-dichloroethylene (156-60-5)	☐	☐	☑	Concentration							
					Mass							
2.25	1,1,1-trichloroethane (71-55-6)	☐	☐	☑	Concentration							
					Mass							
2.26	1,1,2-trichloroethane (79-00-5)	☐	☐	☑	Concentration							
					Mass							
2.27	Trichloroethylene (79-01-6)	☐	☐	☑	Concentration							
					Mass							
2.28	Vinyl chloride (75-01-4)	☐	☐	☑	Concentration							
					Mass							
Section 3. Organic Toxic Pollutants (GC/MS Fraction—Acid Compounds)												
3.1	2-chlorophenol (95-57-8)	☐	☐	☑	Concentration							
					Mass							
3.2	2,4-dichlorophenol (120-83-2)	☐	☐	☑	Concentration							
					Mass							
3.3	2,4-dimethylphenol (105-67-9)	☐	☐	☑	Concentration							
					Mass							
3.4	4,6-dinitro-o-cresol (534-52-1)	☐	☐	☑	Concentration							
					Mass							
3.5	2,4-dinitrophenol (51-28-5)	☐	☐	☑	Concentration							
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

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	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
3.6	2-nitrophenol (88-75-5)	☐	☐	☑	Concentration							
					Mass							
3.7	4-nitrophenol (100-02-7)	☐	☐	☑	Concentration							
					Mass							
3.8	p-chloro-m-cresol (59-50-7)	☐	☐	☑	Concentration							
					Mass							
3.9	Pentachlorophenol (87-86-5)	☑	☑	☐	Concentration	ug/l	hist: ND @10		hist: ND @ 10	12		
					Mass							
3.10	Phenol (108-95-2)	☐	☑	☐	Concentration	ug/l	hist: 12		hist: 5.5	12		
					Mass	lb/day	hist: 0.002		hist: 0.0003			
3.11	2,4,6-trichlorophenol (88-05-2)	☑	☑	☐	Concentration	ug/l	hist: ND @10		hist: ND@10	12		
					Mass							
Section 4. Organic Toxic Pollutants (GC/MS Fraction—Base /Neutral Compounds)												
4.1	Acenaphthene (83-32-9)	☐	☑	☐	Concentration	ug/l	hist: ND @10		hist: ND @10	12		
					Mass							
4.2	Acenaphthylene (208-96-8)	☐	☑	☐	Concentration	ug/l	hist: ND @10		hist: ND @10	12		
					Mass							
4.3	Anthracene (120-12-7)	☐	☐	☑	Concentration							
					Mass							
4.4	Benzidine (92-87-5)	☐	☐	☑	Concentration							
					Mass							
4.5	Benzo (a) anthracene (56-55-3)	☐	☑	☐	Concentration	ug/l	hist: ND @10		hist: ND @10	12		
					Mass							
4.6	Benzo (a) pyrene (50-32-8)	☐	☑	☐	Concentration	ug/l	hist: ND @10		hist: ND @10	12		
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

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	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.7	3,4-benzofluoranthene (205-99-2)	☐	☐	☑	Concentration							
					Mass							
4.8	Benzo (ghi) perylene (191-24-2)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND @10	12		
					Mass							
4.9	Benzo (k) fluoranthene (207-08-9)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND @10	12		
					Mass							
4.10	Bis (2-chloroethoxy) methane (111-91-1)	☐	☐	☑	Concentration							
					Mass							
4.11	Bis (2-chloroethyl) ether (111-44-4)	☐	☐	☑	Concentration							
					Mass							
4.12	Bis (2-chloroisopropyl) ether (102-80-1)	☐	☐	☑	Concentration							
					Mass							
4.13	Bis (2-ethylhexyl) phthalate (117-81-7)	☐	☐	☑	Concentration							
					Mass							
4.14	4-bromophenyl phenyl ether (101-55-3)	☐	☐	☑	Concentration							
					Mass							
4.15	Butyl benzyl phthalate (85-68-7)	☐	☐	☑	Concentration							
					Mass							
4.16	2-chloronaphthalene (91-58-7)	☐	☐	☑	Concentration							
					Mass							
4.17	4-chlorophenyl phenyl ether (7005-72-3)	☐	☐	☑	Concentration							
					Mass							
4.18	Chrysene (218-01-9)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							
4.19	Dibenzo (a,h) anthracene (53-70-3)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.20	1,2-dichlorobenzene (95-50-1)	☐	☐	☑	Concentration							
					Mass							
4.21	1,3-dichlorobenzene (541-73-1)	☐	☐	☑	Concentration							
					Mass							
4.22	1,4-dichlorobenzene (106-46-7)	☐	☐	☑	Concentration							
					Mass							
4.23	3,3-dichlorobenzidine (91-94-1)	☐	☐	☑	Concentration							
					Mass							
4.24	Diethyl phthalate (84-66-2)	☐	☐	☑	Concentration							
					Mass							
4.25	Dimethyl phthalate (131-11-3)	☐	☐	☑	Concentration							
					Mass							
4.26	Di-n-butyl phthalate (84-74-2)	☐	☐	☑	Concentration							
					Mass							
4.27	2,4-dinitrotoluene (121-14-2)	☐	☐	☑	Concentration							
					Mass							
4.28	2,6-dinitrotoluene (606-20-2)	☐	☐	☑	Concentration							
					Mass							
4.29	Di-n-octyl phthalate (117-84-0)	☐	☐	☑	Concentration							
					Mass							
4.30	1,2-Diphenylhydrazine (as azobenzene) (122-66-7)	☐	☐	☑	Concentration							
					Mass							
4.31	Fluoranthene (206-44-0)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							
4.32	Fluorene (86-73-7)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.33	Hexachlorobenzene (118-74-1)	☑	☐	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							
4.34	Hexachlorobutadiene (87-68-3)	☐	☐	☑	Concentration							
					Mass							
4.35	Hexachlorocyclopentadiene (77-47-4)	☐	☐	☑	Concentration							
					Mass							
4.36	Hexachloroethane (67-72-1)	☐	☐	☑	Concentration							
					Mass							
4.37	Indeno (1,2,3-cd) pyrene (193-39-5)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							
4.38	Isophorone (78-59-1)	☐	☐	☑	Concentration							
					Mass							
4.39	Naphthalene (91-20-3)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							
4.40	Nitrobenzene (98-95-3)	☐	☐	☑	Concentration							
					Mass							
4.41	N-nitrosodimethylamine (62-75-9)	☐	☐	☑	Concentration							
					Mass							
4.42	N-nitrosodi-n-propylamine (621-64-7)	☐	☐	☑	Concentration							
					Mass							
4.43	N-nitrosodiphenylamine (86-30-6)	☐	☐	☑	Concentration							
					Mass							
4.44	Phenanthrene (85-01-8)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist: ND@10	12		
					Mass							
4.45	Pyrene (129-00-0)	☐	☑	☐	Concentration	ug/l	hist: ND@10		hist:ND@10	12		
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.46	1,2,4-trichlorobenzene (120-82-1)	☐	☐	☑	Concentration							
					Mass							
Section 5. Organic Toxic Pollutants (GC/MS Fraction—Pesticides)												
5.1	Aldrin (309-00-2)	☐	☐	☑	Concentration							
					Mass							
5.2	α-BHC (319-84-6)	☐	☐	☑	Concentration							
					Mass							
5.3	β-BHC (319-85-7)	☐	☐	☑	Concentration							
					Mass							
5.4	γ-BHC (58-89-9)	☐	☐	☑	Concentration							
					Mass							
5.5	δ-BHC (319-86-8)	☐	☐	☑	Concentration							
					Mass							
5.6	Chlordane (57-74-9)	☐	☐	☑	Concentration							
					Mass							
5.7	4,4'-DDT (50-29-3)	☐	☐	☑	Concentration							
					Mass							
5.8	4,4'-DDE (72-55-9)	☐	☐	☑	Concentration							
					Mass							
5.9	4,4'-DDD (72-54-8)	☐	☐	☑	Concentration							
					Mass							
5.10	Dieldrin (60-57-1)	☐	☐	☑	Concentration							
					Mass							
5.11	α-endosulfan (115-29-7)	☐	☐	☑	Concentration							
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.12	β-endosulfan (115-29-7)	☐	☐	☑	Concentration							
					Mass							
5.13	Endosulfan sulfate (1031-07-8)	☐	☐	☑	Concentration							
					Mass							
5.14	Endrin (72-20-8)	☐	☐	☑	Concentration							
					Mass							
5.15	Endrin aldehyde (7421-93-4)	☐	☐	☑	Concentration							
					Mass							
5.16	Heptachlor (76-44-8)	☐	☐	☑	Concentration							
					Mass							
5.17	Heptachlor epoxide (1024-57-3)	☐	☐	☑	Concentration							
					Mass							
5.18	PCB-1242 (53469-21-9)	☐	☐	☑	Concentration							
					Mass							
5.19	PCB-1254 (11097-69-1)	☐	☐	☑	Concentration							
					Mass							
5.20	PCB-1221 (11104-28-2)	☐	☐	☑	Concentration							
					Mass							
5.21	PCB-1232 (11141-16-5)	☐	☐	☑	Concentration							
					Mass							
5.22	PCB-1248 (12672-29-6)	☐	☐	☑	Concentration							
					Mass							
5.23	PCB-1260 (11096-82-5)	☐	☐	☑	Concentration							
					Mass							
5.24	PCB-1016 (12674-11-2)	☐	☐	☑	Concentration							
					Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.25	Toxaphene (8001-35-2)	☐	☐	☑	Concentration							
					Mass							

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you believe all pollutants on Table C to be ***present*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
☐	Check here if you believe all pollutants on Table C to be ***absent*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
1.	Bromide (24959-67-9)	☐	☑	Concentration							
				Mass							
2.	Chlorine, total residual	☐	☑	Concentration							
				Mass							
3.	Color	☐	☑	Concentration							
				Mass							
4.	Fecal coliform	☐	☑	Concentration							
				Mass							
5.	Fluoride (16984-48-8)	☐	☑	Concentration							
				Mass							
6	Nitrate-nitrite	☐	☑	Concentration							
				Mass							
7.	Nitrogen, total organic (as N)	☐	☑	Concentration							
				Mass							
8.	Oil and grease	☑	☐	Concentration	mg/l	hist: ND @ 5.3		hist: ND @ 4.8	26		
				Mass							
9.	Phosphorus (as P), total (7723-14-0)	☐	☑	Concentration							
				Mass							
10.	Sulfate (as SO_4) (14808-79-8)	☐	☑	Concentration							
				Mass							
11.	Sulfide (as S)	☐	☑	Concentration							
				Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
12.	Sulfite (as SO_3) (14265-45-3)	☐	☑	Concentration							
				Mass							
13.	Surfactants	☐	☑	Concentration							
				Mass							
14.	Aluminum, total (7429-90-5)	☐	☑	Concentration							
				Mass							
15.	Barium, total (7440-39-3)	☑	☐	Concentration	mg/l	hist: 0.015			1		
				Mass	lb/day	hist: 0.002					
16.	Boron, total (7440-42-8)	☐	☑	Concentration							
				Mass							
17.	Cobalt, total (7440-48-4)	☐	☑	Concentration							
				Mass							
18.	Iron, total (7439-89-6)	☑	☐	Concentration	mg/l	hist: 1.87			1		
				Mass	lb/day	hist: 0.25					
19.	Magnesium, total (7439-95-4)	☑	☐	Concentration	mg/l	hist: 0.948			1		
				Mass	lb/day	hist: 0.13					
20.	Molybdenum, total (7439-98-7)	☐	☑	Concentration							
				Mass							
21.	Manganese, total (7439-96-5)	☑	☐	Concentration	mg/l	hist: 0.206			1		
				Mass	lb/day	hist: 0.03					
22.	Tin, total (7440-31-5)	☐	☑	Concentration							
				Mass							
23.	Titanium, total (7440-32-6)	☐	☑	Concentration							
				Mass							

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
24.	**Radioactivity**										
	Alpha, total	☐	☑	Concentration							
				Mass							
	Beta, total	☐	☑	Concentration							
				Mass							
	Radium, total	☐	☑	Concentration							
				Mass							
	Radium 226, total	☐	☑	Concentration							
				Mass							

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
1.	Asbestos	☐	☑		
2.	Acetaldehyde	☐	☑		
3.	Allyl alcohol	☐	☑		
4.	Allyl chloride	☐	☑		
5.	Amyl acetate	☐	☑		
6.	Aniline	☐	☑		
7.	Benzonitrile	☐	☑		
8.	Benzyl chloride	☐	☑		
9.	Butyl acetate	☐	☑		
10.	Butylamine	☐	☑		
11.	Captan	☐	☑		
12.	Carbaryl	☐	☑		
13.	Carbofuran	☐	☑		
14.	Carbon disulfide	☐	☑		
15.	Chlorpyrifos	☐	☑		
16.	Coumaphos	☐	☑		
17.	Cresol	☐	☑		
18.	Crotonaldehyde	☐	☑		
19.	Cyclohexane	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
20.	2,4-D (2,4-dichlorophenoxyacetic acid)	☐	☑		
21.	Diazinon	☐	☑		
22.	Dicamba	☐	☑		
23.	Dichlobenil	☐	☑		
24.	Dichlone	☐	☑		
25.	2,2-dichloropropionic acid	☐	☑		
26.	Dichlorvos	☐	☑		
27.	Diethyl amine	☐	☑		
28.	Dimethyl amine	☐	☑		
29.	Dintrobenzene	☐	☑		
30.	Diquat	☐	☑		
31.	Disulfoton	☐	☑		
32.	Diuron	☐	☑		
33.	Epichlorohydrin	☐	☑		
34.	Ethion	☐	☑		
35.	Ethylene diamine	☐	☑		
36.	Ethylene dibromide	☐	☑		
37.	Formaldehyde	☐	☑		
38.	Furfural	☐	☑		

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	002

Form Approved 03/05/19
OMB No. 2040-0004

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
39.	Guthion	☐	☑		
40.	Isoprene	☐	☑		
41.	Isopropanolamine	☐	☑		
42.	Kelthane	☐	☑		
43.	Kepone	☐	☑		
44.	Malathion	☐	☑		
45.	Mercaptodimethur	☐	☑		
46.	Methoxychlor	☐	☑		
47.	Methyl mercaptan	☐	☑		
48.	Methyl methacrylate	☐	☑		
49.	Methyl parathion	☐	☑		
50.	Mevinphos	☐	☑		
51.	Mexacarbate	☐	☑		
52.	Monoethyl amine	☐	☑		
53.	Monomethyl amine	☐	☑		
54.	Naled	☐	☑		
55.	Naphthenic acid	☐	☑		
56.	Nitrotoluene	☐	☑		
57.	Parathion	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
58.	Phenolsulfonate	☐	☑		
59.	Phosgene	☐	☑		
60.	Propargite	☐	☑		
61.	Propylene oxide	☐	☑		
62.	Pyrethrins	☐	☑		
63.	Quinoline	☐	☑		
64.	Resorcinol	☐	☑		
65.	Strontium	☐	☑		
66.	Strychnine	☐	☑		
67.	Styrene	☐	☑		
68.	2,4,5-T (2,4,5-trichlorophenoxyacetic acid)	☐	☑		
69.	TDE (tetrachlorodiphenyl ethane)	☐	☑		
70.	2,4,5-TP [2-(2,4,5-trichlorophenoxy) propanoic acid]	☐	☑		
71.	Trichlorofon	☐	☑		
72.	Triethanolamine	☐	☑		
73.	Triethylamine	☐	☑		
74.	Trimethylamine	☐	☑		
75.	Uranium	☐	☑		
76.	Vanadium	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
77.	Vinyl acetate	☐	☑		
78.	Xylene	☐	☑		
79.	Xylenol	☐	☑		
80.	Zirconium	☐	☑		

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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TABLE E. 2,3,7,8 TETRACHLORODIBENZO P DIOXIN (2,3,7,8 TCDD) (40 CFR 122.21(g)(7)(viii))

Pollutant	TCDD Congeners Used or Manufactured	Presence or Absence (check one)		Results of Screening Procedure
		Believed Present	Believed Absent	
2,3,7,8-TCDD	☐	☐	☑	

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

Form 2F NPDES

EPA

U.S Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater

STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1))

Outfall Location

1.1 Provide information on each of the facility's outfalls in the table below

Outfall Number	Receiving Water Name	Latitude	Longitude
003	Ditch to Murder Creek	31° 06′ 24.75″ N	87° 03′ 17.25″ W
	(003 sampling location)	31° 06′ 33.5″ N	87° 03′ 27.25″ W
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″

SECTION 2. IMPROVEMENTS (40 CFR 122.21(g)(6))

Improvements

2.1 Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?

☐ Yes ☑ No ➔ SKIP to Section 3.

2.2 Briefly identify each applicable project in the table below.

Brief Identification and Description of Project	Affected Outfalls (list outfall numbers)	Source(s) of Discharge	Final Compliance Dates	
			Required	Projected

2.3 Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? (Optional Item)

☐ Yes ☐ No

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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

SECTION 3. SITE DRAINAGE MAP (40 CFR 122.26(c)(1)(i)(A))

Site Drainage Map

3.1 Have you attached a site drainage map containing all required information to this application? (See instructions for specific guidance.)

☑ Yes ☐ No

SECTION 4. POLLUTANT SOURCES (40 CFR 122.26(c)(1)(i)(B))

Pollutant Sources

4.1 Provide information on the facility's pollutant sources in the table below.

Outfall Number	Impervious Surface Area (within a mile radius of the facility)		Total Surface Area Drained (within a mile radius of the facility)	
003	260,000 (onsite)	specify units sq.ft.	2,600,000 (onsite)	specify units sq.ft.
		specify units		specify units
		specify units		specify units
		specify units		specify units
		specify units		specify units
		specify units		specify units

4.2 Provide a narrative description of the facility's significant material in the space below. (See instructions for content requirements.)

Significant materials produced, stored, and exposed to rainfall at the site are utility poles treated with CCA or pentachlorophenol. These poles are processed in a manner that minimizes any preservative drippage by pulling a final vacuum on all charges. Impervious, roofed, drip pads are used to minimize soil or storm water contamination from freshly treated poles. Daily inspections and clean-up in the storage yard of any observed drippage is part of the drippage management contingency plan. Any blown rainfall within the pentachlorophenol process area is retained as process wastewater. Any blown rainfall within the CCA process area is retained and used as make-up water in the treating process.

4.3 Provide the location and a description of existing structural and non-structural control measures to reduce pollutants in stormwater runoff. (See instructions for specific guidance.)

Stormwater Treatment		
Outfall Number	Control Measures and Treatment	Codes from Exhibit 2F–1 (list)
003	Process areas under roof. Drip pads. Drippage management contingency plan, inspections.	
003	Final vacuum on charges. Tanks under roof and within secondary containment.	
003	There is no treatment of storm water.	

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

SECTION 5. NON STORMWATER DISCHARGES (40 CFR 122.26(c)(1)(i)(C))

Non-Stormwater Discharges

5.1 *I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of non-stormwater discharges. Moreover, I certify that the outfalls identified as having non-stormwater discharges are described in either an accompanying NPDES Form 2C, 2D, or 2E application.*

Name (print or type first and last name)	Official title
Richard K. Stanley	President & CEO
Signature	**Date signed**
Richard K. Stanley	12/31/19

5.2 Provide the testing information requested in the table below.

Outfall Number	Description of Testing Method Used	Date(s) of Testing	Onsite Drainage Points Directly Observed During Test
003	Visual Observation	12/12/2019	003 Sampling Location

SECTION 6. SIGNIFICANT LEAKS OR SPILLS (40 CFR 122.26(c)(1)(i)(D))

Significant Leaks or Spills

6.1 Describe any significant leaks or spills of toxic or hazardous pollutants in the last three years.

None

SECTION 7. DISCHARGE INFORMATION (40 CFR 122.26(c)(1)(i)(E))

Discharge Information

See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.

7.1 Is this a new source or new discharge?

☐ Yes → See instructions regarding submission of *estimated* data.

☑ No → See instructions regarding submission of *actual* data.

Tables A, B, C, and D

7.2 Have you completed Table A for each outfall?

☑ Yes ☐ No

Discharge Information Continued

7.3	Is the facility subject to an effluent limitation guideline (ELG) or effluent limitations in an NPDES permit for its process wastewater? ☑ Yes ☐ No ➔ SKIP to Item 7.5.
7.4	Have you completed Table B by providing quantitative data for those pollutants that are (1) limited either directly or indirectly in an ELG and/or (2) subject to effluent limitations in an NPDES permit for the facility's process wastewater? ☑ Yes ☐ No
7.5	Do you know or have reason to believe any pollutants in Exhibit 2F–2 are present in the discharge? ☑ Yes ☐ No ➔ SKIP to Item 7.7.
7.6	Have you listed all pollutants in Exhibit 2F–2 that you know or have reason to believe are present in the discharge and provided quantitative data or an explanation for those pollutants in Table C? ☑ Yes ☐ No
7.7	Do you qualify for a small business exemption under the criteria specified in the Instructions? ☐ Yes ➔ SKIP to Item 7.18. ☑ No
7.8	Do you know or have reason to believe any pollutants in Exhibit 2F–3 are present in the discharge? ☑ Yes ☐ No ➔ SKIP to Item 7.10.
7.9	Have you listed all pollutants in Exhibit 2F–3 that you know or have reason to believe are present in the discharge in Table C? ☑ Yes ☐ No
7.10	Do you expect any of the pollutants in Exhibit 2F–3 to be discharged in concentrations of 10 ppb or greater? ☑ Yes ☐ No ➔ SKIP to Item 7.12.
7.11	Have you provided quantitative data in Table C for those pollutants in Exhibit 2F–3 that you expect to be discharged in concentrations of 10 ppb or greater? ☑ Yes ☐ No
7.12	Do you expect acrolein, acrylonitrile, 2,4-dinitrophenol, or 2-methyl-4,6-dinitrophenol to be discharged in concentrations of 100 ppb or greater? ☐ Yes ☑ No ➔ SKIP to Item 7.14.
7.13	Have you provided quantitative data in Table C for the pollutants identified in Item 7.12 that you expect to be discharged in concentrations of 100 ppb or greater? ☐ Yes ☐ No
7.14	Have you provided quantitative data or an explanation in Table C for pollutants you expect to be present in the discharge at concentrations less than 10 ppb (or less than 100 ppb for the pollutants identified in Item 7.12)? ☑ Yes ☐ No
7.15	Do you know or have reason to believe any pollutants in Exhibit 2F–4 are present in the discharge? ☐ Yes ☑ No ➔ SKIP to Item 7.17.
7.16	Have you listed pollutants in Exhibit 2F–4 that you know or believe to be present in the discharge and provided an explanation in Table C? ☐ Yes ☐ No
7.17	Have you provided information for the storm event(s) sampled in Table D? ☐ Yes ☑ No

Discharge Information Continued

Used or Manufactured Toxics

7.18 Is any pollutant listed on Exhibits 2F–2 through 2F–4 a substance or a component of a substance used or manufactured as an intermediate or final product or byproduct?

☑ Yes ☐ No ➔ SKIP to Section 8.

7.19 List the pollutants below, including TCDD if applicable.

1. Pentachlorophenol	4. Copper	7. Naphthalene
2. Arsenic	5. Oil & Grease	8. Hexachlorobenzene
3. Chromium	6. 2-4-6 Trichlorophenol	9.

SECTION 8. BIOLOGICAL TOXICITY TESTING DATA (40 CFR 122.21(g)(11))

Biological Toxicity Testing Data

8.1 Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last three years?

☐ Yes ☑ No ➔ SKIP to Section 9.

8.2 Identify the tests and their purposes below.

Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

SECTION 9. CONTRACT ANALYSIS INFORMATION (40 CFR 122.21(g)(12))

Contract Analysis Information

9.1 Were any of the analyses reported in Section 7 (on Tables A through C) performed by a contract laboratory or consulting firm?

☑ Yes ☐ No ➔ SKIP to Section 10.

9.2 Provide information for each contract laboratory or consulting firm below.

	Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
Name of laboratory/firm	Test America		
Laboratory address	3355 McLemore Dr. Pensacola, FL 32514		
Phone number	(850) 474-1001		
Pollutant(s) analyzed	All		

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	

SECTION 10. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

10.1 In Column 1 below, mark the sections of Form 2F that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.

Column 1	Column 2
☑ Section 1	☐ w/ attachments (e.g., responses for additional outfalls)
☐ Section 2	☐ w/ attachments
☑ Section 3	☑ w/ site drainage map
☑ Section 4	☐ w/ attachments
☑ Section 5	☐ w/ attachments
☐ Section 6	☐ w/ attachments
☑ Section 7	☑ Table A ☐ w/ small business exemption request ☑ Table B ☐ w/ analytical results as an attachment ☑ Table C ☐ Table D
☐ Section 8	☐ w/attachments
☑ Section 9	☐ w/attachments (e.g., responses for additional contact laboratories or firms)
☑ Section 10	☐

10.2 **Certification Statement**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Richard K. Stanley	President & CEO
Signature: Richard K Stanley	Date signed: 12/31/19

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	003

Form Approved 03/05/19
OMB No. 2040-0004

TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETERS (40 CFR 122.26(c)(1)(i)(E)(3))[1]

You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details and requirements.

	Pollutant or Parameter	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
1.	Oil and grease	1.9 mg/L		0.3 mg/L		11	
2.	Biochemical oxygen demand (BOD_5)	9.4 mg/L	No data	2 mg/L	No data	11	
3.	Chemical oxygen demand (COD)	30 mg/L	No data	6 mg/L	No data	0	est. from BOD
4.	Total suspended solids (TSS)	160 mg/L	No data	35 mg/L	No data	11	
5.	Total phosphorus	0.16 mg/L	No data	0.16 mg/L	No data	1	Historic data
6.	Total Kjeldahl nitrogen (TKN)	1.4 mg/L	No data	1.4 mg/L	No data	1	Historic data
7.	Total nitrogen (as N)	<0.10 mg/L	No data	<0.10 mg/L	No data	1	Historic data
8.	pH (minimum)	6.30		6.87		6	
	pH (maximum)	7.57		6.87		6	

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	003

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.26(c)(1)(i)(E)(4) and 40 CFR 122.21(g)(7)(vi)(A))[1]

List each pollutant that is limited in an effluent limitation guideline (ELG) that the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
Acenaphthene	14 ug/L	no data	5 ug/L	no data	16	
Acenaphthylene	1.6 ug/L	no data	0.2 ug/L	no data	16	
Benzo(a)pyrene	< 0.56 ug/L	no data	< 0.56 ug/L	no data	16	
Benzo(k)pyrene	< 0.43 ug/L	no data	< 0.43 ug/L	no data	16	
Chrysene	< 0.49 ug/L	no data	< 0.49 ug/L	no data	16	
Fluorene	9.4 ug/L	no data	3 ug/L	no data	16	
Phenanthrene	6.6 ug/L	no data	1 ug/L	no data	16	
Pentachlorophenol	310 ug/L	no data	31 ug/L	no data	16	
Total Phenols	180 ug/L	no data	33 ug/L	no data	16	
2,4-Dimethylphenol	51 ug/L	no data	10 ug/L	no data	16	
2,4,6-Trichlorophenol	< 3.5 ug/L	no data	< 3.5 ug/L	no data	16	
Arsenic	95 ug/L	no data	33 ug/L	no data	16	
Chromium	88 ug/L	no data	19 ug/L	no data	16	
Copper	43 ug/L	no data	9 ug/L	no data	16	

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	003

Form Approved 03/05/19
OMB No. 2040-0004

TABLE C. TOXIC POLLUTANTS, CERTAIN HAZARDOUS SUBSTANCES, AND ASBESTOS (40 CFR 122.26(c)(1)(i)(E)(4) and 40 CFR 122.21(g)(7)(vi)(B) and (vii))[1]

List each pollutant shown in Exhibits 2F–2, 2F–3, and 2F–4 that you know or have reason to believe is present. Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
Naphthalene	15 ug/L	no data	15 ug/L	no data	1	
Hexachlorobenzene	<1 ug/L	no data	< 1 ug/L	no data	1	

[1] Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number	NPDES Permit Number	Facility name	Outfall Number
ALD008161416	AL0000779	T. R. Miller Mill Company, Inc.	003

Form Approved 03/05/19
OMB No. 2040-0004

TABLE D. STORM EVENT INFORMATION (40 CFR 122.26(c)(1)(i)(E)(6))

Provide data for the storm event(s) that resulted in the maximum daily discharges for the flow-weighted composite sample.

Date of Storm Event	Duration of Storm Event (in hours)	Total Rainfall During Storm Event (in inches)	Number of Hours Between Beginning of Storm Measured and End of Previous Measurable Rain Event	Maximum Flow Rate During Rain Event (in gpm or specify units)	Total Flow from Rain Event (in gallons or specify units)

Provide a description of the method of flow measurement or estimate.

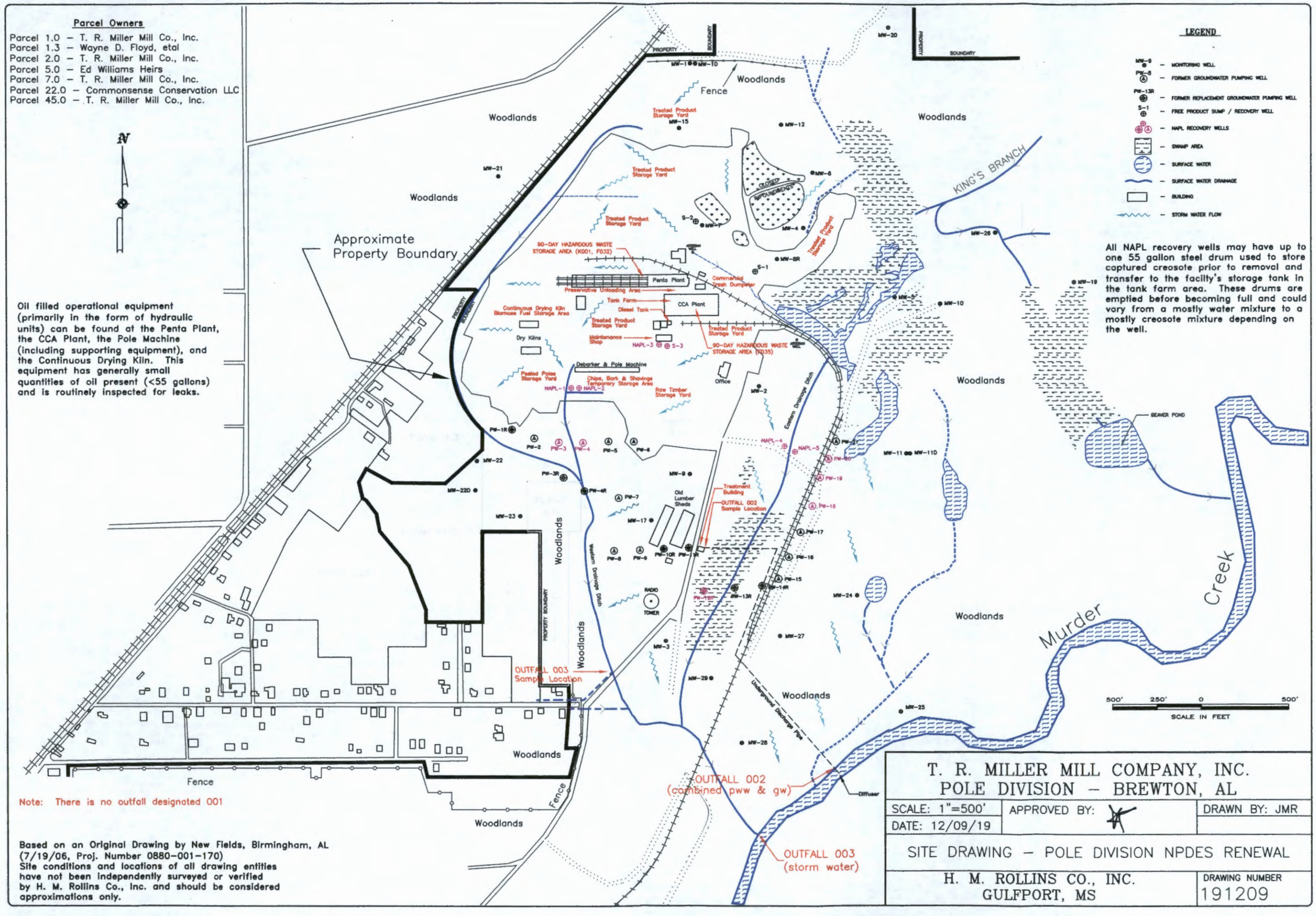
No recent flow-weighted composite data is available and flow-weighted composite sampling is not required under facility's permit.

Parcel Owners

Parcel 1.0 – T. R. Miller Mill Co., Inc.
Parcel 1.3 – Wayne D. Floyd, etal
Parcel 2.0 – T. R. Miller Mill Co., Inc.
Parcel 5.0 – Ed Williams Heirs
Parcel 7.0 – T. R. Miller Mill Co., Inc.
Parcel 22.0 – Commonsense Conservation LLC
Parcel 45.0 – T. R. Miller Mill Co., Inc.

N

Oil filled operational equipment (primarily in the form of hydraulic units) can be found at the Penta Plant, the CCA Plant, the Pole Machine (including supporting equipment), and the Continuous Drying Kiln. This equipment has generally small quantities of oil present (<55 gallons) and is routinely inspected for leaks.



LEGEND

- MW-9 – MONITORING WELL
- PW-8 – FORMER GROUNDWATER PUMPING WELL
- PW-13R – FORMER REPLACEMENT GROUNDWATER PUMPING WELL
- S-1 – FREE PRODUCT SUMP / RECOVERY WELL
- – NAPL RECOVERY WELLS
- – SWAMP AREA
- – SURFACE WATER
- – SURFACE WATER DRAINAGE
- – BUILDING
- – STORM WATER FLOW

All NAPL recovery wells may have up to one 55 gallon steel drum used to store captured creosote prior to removal and transfer to the facilty's storage tank in the tank farm area. These drums are emptied before becoming full and could vary from a mostly water mixture to a mostly creosote mixture depending on the well.

Note: There is no outfall designated 001

Based on an Original Drawing by New Fields, Birmingham, AL (7/19/06, Proj. Number 0880-001-170)
Site conditions and locations of all drawing entities have not been independently surveyed or verified by H. M. Rollins Co., Inc. and should be considered approximations only.

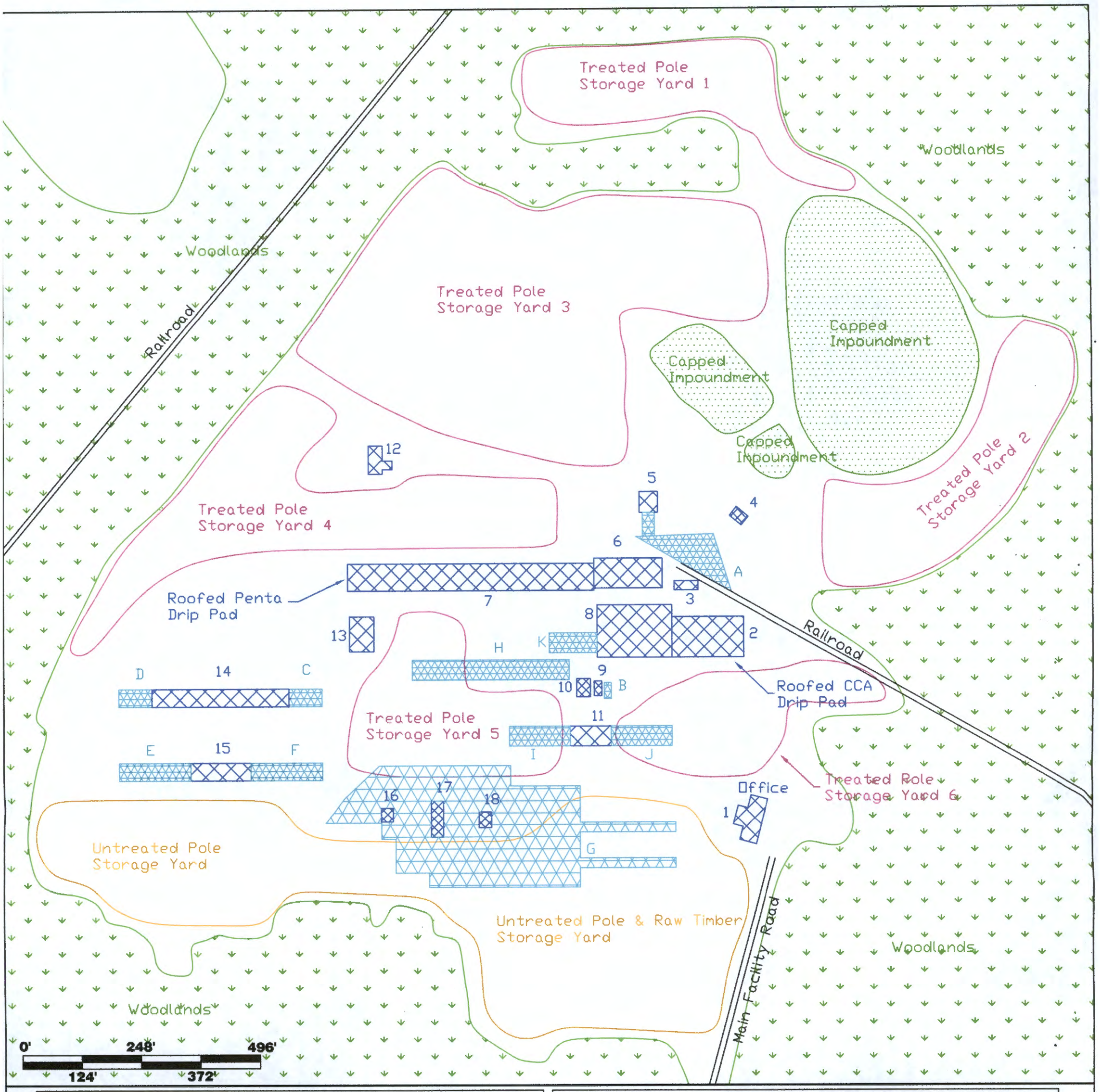
T. R. MILLER MILL COMPANY, INC.
POLE DIVISION – BREWTON, AL

SCALE: 1"=500'	APPROVED BY:	DRAWN BY: JMR
DATE: 12/09/19		

SITE DRAWING – POLE DIVISION NPDES RENEWAL

H. M. ROLLINS CO., INC.
GULFPORT, MS

DRAWING NUMBER
191209



APPROXIMATE AREAS OF SIGNIFICANT LOCATIONS

Location	Area (SQ. FT.)	LOCATION	AREA (SQ. FT)
Bld 1	4,308	Bld 10	1,074
Bld 2	12,581	Bld 11	3,500
Bld 3	956	Bld 12	2,047
Bld 4	735	Bld 13	3,663
Bld 5	1,648	Bld 14	10,289
Bld 6	8.861	Bld 15	4,518
Bld 7	28,683	Bld 16	714
Bld 8	16,905	Bld 17	1,885
Bld 9	485	Bld 18	863

APPROXIMATE AREAS OF SIGNIFICANT LOCATIONS

Location	Area (SQ. FT.)	LOCATION	AREA (SQ. FT)
Treated Pole Storage Yard 1	94,706	Area A	10,943
Treated Pole Storage Yard 2	120,042	Area B	490
Treated Pole Storage Yard 3	372,448	Area C	2,497
Treated Pole Storage Yard 4	174,656	Area D	2,497
Treated Pole Storage Yard 5	102,412	Area E	5,382
Treated Pole Storage Yard 6	77,084	Area F	5,382
Untreated Storage	402,039	Area G	109,140
Combined Impoundments	224,521	Area H	13,422
		Area I	5,206
		Area J	5,206
		Area K	4,101

Roofed Structure

Concrete or Asphalt Area

This drawing was created from an aerial photograph linked to GIS data to provide accurate scaling and orientation. However the objects and locations depicted are not from an on-site survey and should be considered approximations useful for relative site relationships between the different areas of the facility. The calculated areas are not represented to be exact values and should be considered approximations only.

T. R. MILLER MILL COMPANY, INC.
TREATING PLANT – BREWTON, AL

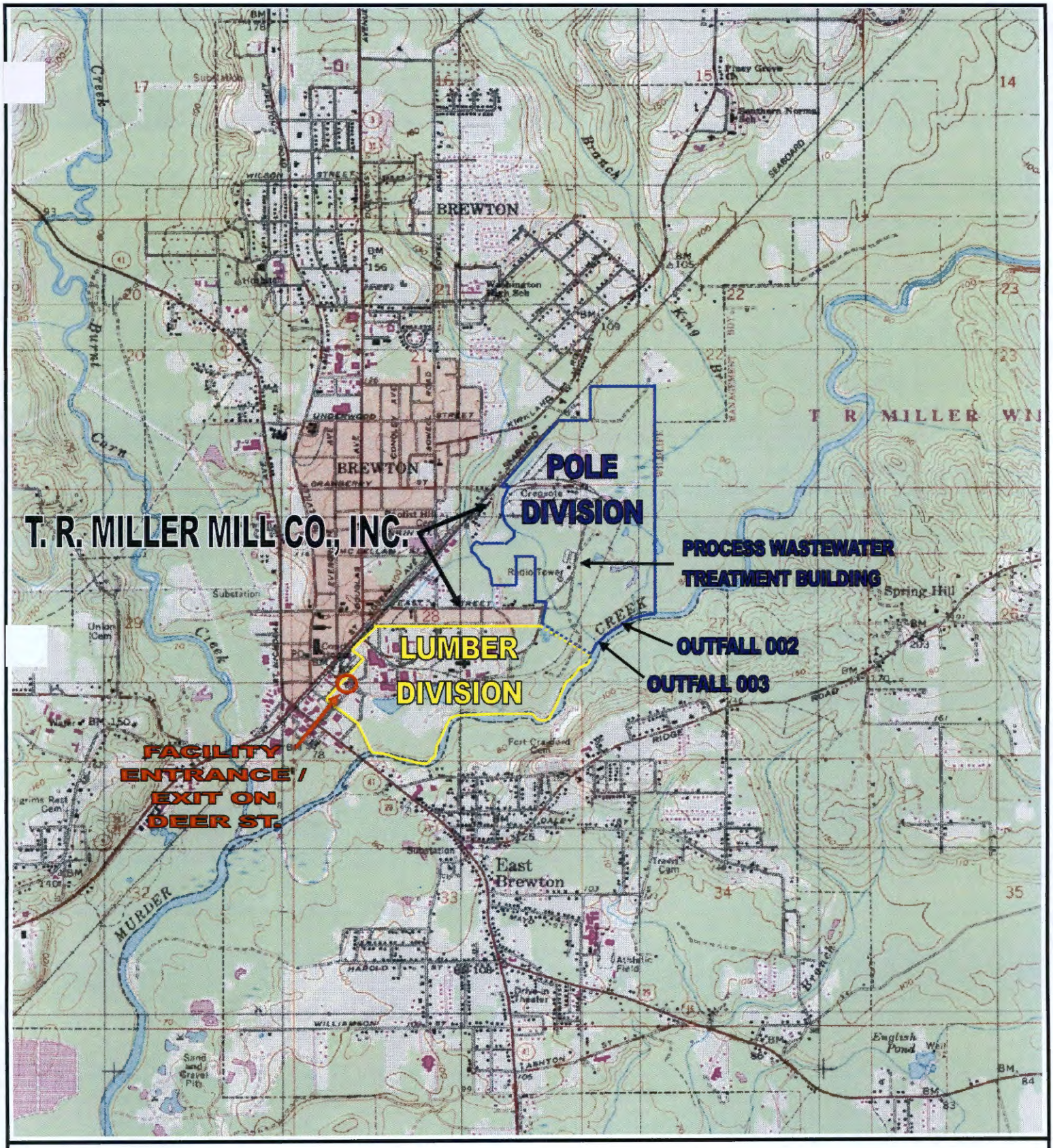
SCALE: AS SHOWN | APPROVED BY: | DRAWN BY: JMR

DATE: 10/27/08

Site Drawing of Roofed and Concreted Areas

H. M. ROLLINS CO., INC.
GULFPORT, MS

DRAWING NUMBER
070801a1



T. R. MILLER MILL COMPANY, INC.	U.S.G.S. TOPOGRAPHIC MAP	SCALE:	H.M. ROLLINS CO., INC.
BREWTON, ALABAMA	QUAD: BREWTON SOUTH	1" = 2450'	GULFPORT, MS

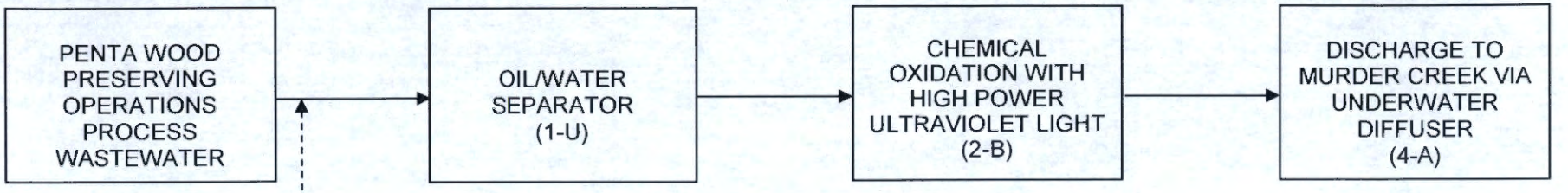
FILENAME: TRMiller_USGS_v6 for TP NPDES

12/9/2019

T. R. MILLER MILL COMPANY, INC.
BREWTON, ALABAMA
POLE DIVISION AERIAL PHOTOGRAPH
H. M. ROLLINS CO., INC. GULFPORT, MS

T. R. MILLER MILL COMPANY, INC.

CURRENT LINE DRAWING



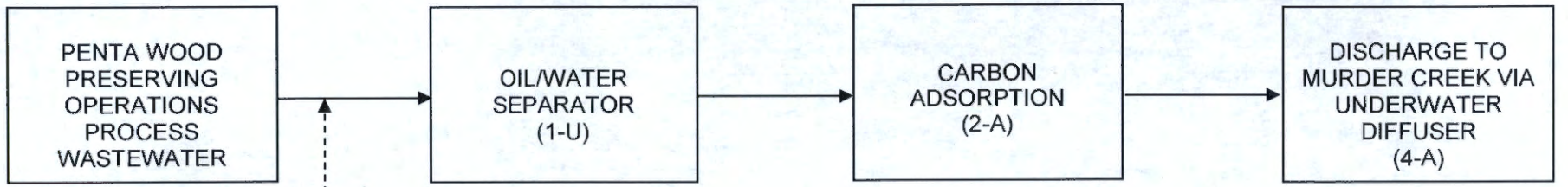
Process wastewater to be discharged in batches when enough is accumulated.

Discharge of 1,000 gallons per day per event. No discharge event has occurred in the last 10 years.

Note: Groundwater is presently not required to be extracted and treated.

T. R. Miller still needs the ability to treat and discharge groundwater in the event that the State requires that the groundwater pump-and-treat system be restarted. T. R. Miller is proposing to continue on the same monitoring schedule with the same pollutants as in the current permit (which was established based on treating and discharging groundwater) to help facilitate this request.

PLANNED NEW LINE DRAWING FOR PERMIT RENEWAL



Facility is in planning stages of replacing the UV System with an Activated Carbon System to be initialized at permit renewal.