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Alabama Department of Environmental Management
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Montgomery, Alabama 36130-1463
(334) 271-7700 ▪ FAX (334) 271-7950

December 28, 2022

PHIL FULTZ
CHIEF OPERATING OFFICER
AM/NS CALVERT LLC
1 AM/NS WAY
CALVERT, AL 36513

RE: REVISED DRAFT PERMIT MODIFICATION
NPDES PERMIT NUMBER AL0080233

Dear Mr. Fultz:

Transmitted herein is a revised draft of the referenced permit modification.

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 have utilized the Department's web-based electronic environmental (E2) reporting system for submittal of discharge monitoring reports (DMRs). The Department transitioned 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 has used 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.

E2 users that met 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 Scott Jackson by e-mail at **scott.jackson@adem.alabama.gov** or by phone at **(334) 394-4366.**

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)

ADEM
Alabama Department of Environmental Management

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE:	AM/NS CALVERT LLC	
FACILITY:	AM/NS CALVERT LLC 1 AM/NS WAY CALVERT, ALABAMA 36513	
PERMIT NUMBER:	AL0080233	
PERMIT NUMBER:	DSN001, DSN009, & DSN010:	TOMBIGBEE RIVER
	DSN002 & DSN003:	SHEPPARD LAKE
	DSN004:	UNNAMED TRIBUTARYU TO SHEPPARD LAKE
	DSN007:	BARROW CREEK
	DSN011:	DABNEY 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: JANUARY 31, 2022

EFFECTIVE DATE: FEBRUARY 01, 2022

EXPIRATION DATE: JANUARY 31, 2027

MODIFICATION ISSUED DATE:

MODIFICATION EFFECTIVE DATE:

Revised 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

DSN0011: Treated wastewater from acid cleaning and nickel-plating operations. **3/ 4/**

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 DSN001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Temperature, Water Deg. Fahrenheit (00011) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	115 Maximum Daily	deg F	Daily	Grab	All Months
Oxygen, Dissolved (DO) (00300) Effluent Gross Value	*****	*****	*****	2.0 Minimum Daily	(Report) Monthly Average	*****	mg/l	2X Monthly	Grab	All Months
pH (00400) Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	9.0 Maximum Daily	S.U.	Daily	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	31 Monthly Average	60 Maximum Daily	mg/l	Weekly	Composite	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	26 Monthly Average	52 Maximum Daily	mg/l	Weekly	Grab	All Months
Nitrogen, Ammonia Total (As N) (00610) Effluent Gross Value	*****	*****	*****	*****	16 Monthly Average	24 Maximum Daily	mg/l	2X Monthly	Composite	All Months
Nitrogen, Kjeldahl Total (As N) (00625) Effluent Gross Value	*****	*****	*****	*****	46 Monthly Average	69 Maximum Daily	mg/l	2X Monthly	Composite	Apr, May, Jun, Jul, Aug, Sep, Oct
Nitrite Plus Nitrate Total 1 Det. (As N) (00630) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Composite	Apr, May, Jun, Jul, Aug, Sep, Oct

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/ No user subject to the provisions of this subpart shall augment the use of process wastewater or otherwise dilute the wastewater as a partial or total substitute for adequate treatment to achieve compliance with this limitation.

DSN0011 (Continued): Treated wastewater from acid cleaning and nickel-plating operations. **3/ 4/**

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 DSN001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Phosphorus, Total (As P) (00665) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Composite	Apr, May, Jun, Jul, Aug, Sep, Oct
Cyanide, Total (As CN) (00720) Effluent Gross Value	*****	*****	*****	*****	0.65 Monthly Average	1.2 Maximum Daily	mg/l	Weekly	Grab	All Months
Cadmium, Total (As Cd) (01027) Effluent Gross Value	*****	*****	*****	*****	0.07 Monthly Average	0.11 Maximum Daily	mg/l	Weekly	Composite	All Months
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	1.71 Monthly Average	2.77 Maximum Daily	mg/l	Weekly	Composite	All Months
Copper, Total (As Cu) (01042) Effluent Gross Value	*****	*****	*****	*****	2.07 Monthly Average	3.38 Maximum Daily	mg/l	Weekly	Composite	All Months
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	0.43 Monthly Average	0.69 Maximum Daily	mg/l	Weekly	Composite	All Months
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	2.38 Monthly Average	3.98 Maximum Daily	mg/l	Weekly	Composite	All Months
Silver, Total (As Ag) (01077) Effluent Gross Value	*****	*****	*****	*****	0.24 Monthly Average	0.43 Maximum Daily	mg/l	Weekly	Composite	All Months

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/ No user subject to the provisions of this subpart shall augment the use of process wastewater or otherwise dilute the wastewater as a partial or total substitute for adequate treatment to achieve compliance with this limitation.

DSN0011 (Continued): Treated wastewater from acid cleaning and nickel-plating operations. **3/ 5/**

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 DSN001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	1.48 Monthly Average	2.61 Maximum Daily	mg/l	Weekly	Composite	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Daily	Totalizer	All Months
Mercury Total Recoverable **6/** (71901) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	Monthly	Composite	All Months
Organics, Total Toxic (TTO) **4/** (78141) Effluent Gross Value	*****	*****	*****	*****	*****	2.13 Maximum Daily	mg/l	Monthly	Composite	All Months
BOD, Carbonaceous 05 Day, 20C (80082) Effluent Gross Value	*****	*****	*****	*****	38 Monthly Average	57 Maximum Daily	mg/l	2X Monthly	Composite	All Months

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.E and F for Total Toxic Organics (TTO) Requirements and Listing.

5/ The permittee shall not augment the use of process wastewater or otherwise dilute the wastewater as a partial or total substitute for adequate treatment to achieve compliance with these limitations.

6/ See Part I.B.2 for testing methods.

DSN001T Treated wastewater from acid cleaning and nickel-plating operations. **3/ 4/**

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 DSN001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Toxicity, Ceriodaphnia Acute (61425) Effluent Gross Value	*****	0 Single Sample	pass=0;fail=1	*****	*****	*****	*****	Quarterly	Composite	All Months
Toxicity, Pimephales Acute (61427) Effluent Gross Value	*****	0 Single Sample	pass=0;fail=1	*****	*****	*****	*****	Quarterly	Composite	All Months

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.C for Effluent Toxicity and Biomonitoring Requirements.

DSN002Q & DSN003Q: Utility wastewaters including boiler blowdown, non-contact cooling water, demineralizer blowdown/backwash water, discharge from the ASU, RO reject water, condensates, treated river water tank effluent/overflow, air conditioner unit non-contact cooling water, equipment maintenance wastewaters and vehicle rinse water, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities. **3/ 4/ 5/**

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 DSN002 & DSN003, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Estimate	All Months

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.D for 316 (b) Requirements.

5/ Outfalls DSN002 and DSN004 are deemed representative of Outfall DSN003. Monitoring is only required at Outfalls DSN002 and DSN004.

DSN002Q & DSN003Q (Continued): Utility wastewaters including boiler blowdown, non-contact cooling water, demineralizer blowdown/backwash water, discharge from the ASU, RO reject water, condensates, treated river water tank effluent/overflow, air conditioner unit non-contact cooling water, equipment maintenance wastewaters and vehicle rinse water, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities. **3/ 4/ 5/**

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 DSN002 & DSN003, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Mercury Total Recoverable **6/** (71901) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
Chemical Oxygen Demand (COD) (2) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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.D for 316 (b) Requirements.

5/ Outfalls DSN002 and DSN004 are deemed representative of Outfall DSN003. Monitoring is only required at Outfalls DSN002 and DSN004.

6/ See Part I.B.2 for testing methods.

DSN004Q: Utility wastewaters including boiler blowdown, non-contact cooling water, demineralizer blowdown/backwash water, condensates, treated river water tank effluent/overflow, equipment maintenance wastewaters and vehicle rinse water, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities. **3/ 4/ 5/**

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 DSN004, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Estimate	All Months

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.D for 316 (b) Requirements.

5/ Outfalls DSN002 and DSN004 are deemed representative of Outfall DSN003. Monitoring is only required at Outfalls DSN002 and DSN004.

DSN004Q (Continued): Utility wastewaters including boiler blowdown, non-contact cooling water, demineralizer blowdown/backwash water, condensates, treated river water tank effluent/overflow, equipment maintenance wastewaters and vehicle rinse water, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities.. **3/ 4/ 5/**

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 DSN004, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Mercury Total Recoverable 6/ (71901) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
Chemical Oxygen Demand (COD) (2) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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.D for 316 (b) Requirements.

5/ Outfalls DSN002 and DSN004 are deemed representative of Outfall DSN003. Monitoring is only required at Outfalls DSN002 and DSN004.

6/ See Part I.B.2 for testing methods.

DSN007Q: Stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water. **3/ 4/**

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 DSN007, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Estimate	All Months

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.

DSN007Q (Continued): Stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water. **3/ 4/**

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 DSN007, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Mercury Total Recoverable **5/** (71901) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
Chemical Oxygen Demand (COD) (2) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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/ See Part I.B.2 for testing methods.

DSN009Q & DSN010Q: Stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities, and from scrap, raw materials, and finished products unloading from the river terminal, and dust suppression water. **3/ 4/ 5/**

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 DSN009, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Estimate	All Months

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/ Outfall DSN009 is deemed representative of Outfall DSN010. Monitoring is only required at Outfall DSN009.

DSN009Q & DSN010Q: (Continued): Stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities, and from scrap, raw materials, and finished products unloading from the river terminal, and dust suppression water. **3/ 4/ 5/**

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 DSN009, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Mercury Total Recoverable 6/ (71901) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
Chemical Oxygen Demand (COD) (2) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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/ Outfall DSN009 is deemed representative of Outfall DSN010. Monitoring is only required at Outfall DSN009.

6/ See Part I.B.2 for testing methods.

DSN011S: Stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water. **3/ 4/**

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 DSN011, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Semi-Annually	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Semi-Annually	Estimate	All Months

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.

DSN011S (Continued): Stormwater runoff associated with manufacturing of carbon steel including transportation equipment activities, and dust suppression water. **3/ 4/**

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 DSN011, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Mercury Total Recoverable **5/** (71901) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Semi-Annually	Grab	All Months
Chemical Oxygen Demand (COD) (2) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months

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/ See Part I.B.2 for testing methods.

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 March, 2022.** 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 July, 2022.** 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 5 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 the 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.

Permittees 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
Water Division
Office of Water Services
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
Water Division
Office of Water Services
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

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;

      (3) quantities to be used;

      (4) frequencies of use;

      (5) 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 30l(c), 30l(g), 30l(h), 30l(k), or 3l6(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 samples shall be diluted using an appropriate control water, to the Instream Waste Concentration (IWC) which is 11.0% effluent. The IWC is the actual concentration of effluent, after mixing, in the receiving stream during a 1-day, 10-year flow period.

(2) The samples shall be representative of the combined discharge flow from Outokumpu Stainless (AL0079901) and AM/NS Calvert (AL0080233). The samples may be taken after the flows combine from each facility or prior to commingling in which the samples must be flow-weighted based on the actual flow from each facility during the sampling period.

(3) 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

D. COOLING WATER INTAKE STRUCTURE (CWIS) REQUIREMENTS

The Permittee receives its cooling water from Outokumpu Stainless USA whose intake structure has been determined to meet the BTA requirements in accordance with section 316 (b) of the federal Clean Water Act.

E. TOTAL TOXIC ORGANIC (TTO) REQUIREMENTS

Total Toxic Organics (TTO) shall be defined as found in the applicable regulation (e.g., 40 CFR Parts 413, 433, 464, 465, 467, 468, or 469). TTO monitoring shall be necessary only for those compounds which are possibly present as a result of screening analyses, and/or a detailed review of TTO sources used in the facility. Annual certification shall be submitted by the permittee in January that the TTO parameters tested during the previous calendar year were those which could reasonably be expected as a result of screening analyses and/or presence of the TTO compound on-site. In addition to TTO monitoring, the Director or his designee may require that the permittee prepare and submit for approval and implementation a toxic organic management plan *[or solvent management plan]*.

In lieu of TTO monitoring, facilities subject to 40 CFR Part 413, 433, and 469 may submit a toxic organics management plan *[or solvent management plan,]* which identifies toxic organic compounds used, the method of disposal used instead of discharge (such as reclamation, contract hauling or incineration) and procedures used for ensuring that toxic organics do not routinely spill or leak into the wastewater. The Department shall review the plan and initial TTO analysis, and if the plan is approved, the plan and any Department comments shall become a requirement of this permit. If design or construction is needed for the plan, engineering plans and specifications shall be submitted to the Department for review.

Should toxic organic pollutant levels be sufficiently low for those facilities subject to 40 CFR Part 413, 433, or 469 and the toxic organic management plan *[or solvent management plan]* is approved by the Department, the Department may waive further monitoring requirements provided all monitoring reports submitted thereafter include the following certification:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan [or solvent management plan] submitted to the permitting (or control) authority."

Should in-plant conditions change such that the toxic organic management plan [or solvent management plan] is no longer valid (i.e., spill containment is modified, toxic organic compounds used are changed, etc.), a modified plan and implementation schedule shall be submitted 90 days prior to such change and must be approved by the Department to again discontinue TTO monitoring. In any event, the toxic organic management plan [or solvent management plan] shall be reviewed and updated at least yearly after approval by the Department, to assure that the plan is still valid and meets the intent of this permit. Such review and update shall include, but not be limited to, a review of toxic organics used, containment provisions for each, and a physical examination of all components of the containment or management system used. Records of this yearly review shall be maintained by the permittee for a minimum of three years.

Discharge of TTO to any waste stream limited by this permit shall in no case be intentional, unless the waste treatment system is designed to remove TTO, and such discharge has been specifically approved by the ADEM Water Division.

F. TOTAL TOXIC ORGANICS (TTO) LISTING

Acenaphthene	Bis (2-chloroethoxy) methane	Tetrachloroethylene
Acrolein	Methylene chloride (dichloromethane)	Toluene
Acrylonitrile	Methyl chloride (chloromethane)	Trichloroethylene
Benzene	Methyl bromide (bromomethane)	Vinyl chloride (chloroethylene)
Benzidine	Bromoform (tribromomethane)	Aldrin
Carbon tetrachloride (tetrachloromethane)	Dichlorobromomethane	Dieldrin
Chlorobenzene	Chlorodibromomethane	Chlordane (technical mixture and metabolites)
1,2,4-Trichlorobenzene	Hexachlorobutadiene	4,4-DDT
Hexachlorobenzene	Hexachlorocyclopentadiene	4,4-DDE (p,p-DDX)
1,2,-Dichloroethane	Isophorone	4,4-DDD (p,p-TDE)
1,1,1-Trichloroethane	Naphthalene	Alpha-endosulfan
Hexachloroethane	Nitrobenzene	Beta-endosulfan
1,1-Dichloroethane	2-Nitrophenol	Endosulfan sulfate
1,1,2-Trichloroethane	4-Nitrophenol	Endrin
1,1,2,2-Tetrachloroethane	2,4-Dinitrophenol	Endrin aldehyde
Chloroethane	4,6-Dinitro-o-cresol	Heptachlor
Bis (2-chloroethyl) ether	N-nitrosodimethylamine	Heptachlor epoxide
2-Chloroethyl vinyl ether (mixed)	N-nitrosodiphenylamine	(BHC-hexachloro-
2-Chloronaphthalene	N-nitrosodi-n-propylamine	cyclohexane)
2,4,6-Trichlorophenol	Pentachlorophenol	Alpha-BHC
Parachlorometa cresol	Phenol	Beta-BHC
Chloroform (trichloromethane)	Bis (2-ethylhexyl) phthalate	Gamma-BHC
2-Chlorophenol	Butyl benzyl phthalate	Delta-BHC
1,2-Dichlorobenzene	Di-n-butyl phthalate	(PCB-polychlorinated biphenyls)
1,3-Dichlorobenzene	Di-n-octyl phthalate	PCB-1242 (Arochlor 1242)
1,4-Dichlorobenzene	Diethyl phthalate	PCB-1254 (Arochlor 1254)

3,3-Dichlorobenzidine
1,1-Dichloroethylene
1,2-Trans-dichloroethylene
2,4-Dichlorophenol
1,2-Dichloropropane
1,3-Dichloropropylene (1,3-dichloropropene)
2,4-Dimethylphenol
2,4-Dinitrotoluene
2,6-Dinitrotoluene
1,2-Diphenylhydrazine
Ethylbenzene
Fluoranthene
4-Chlorophenyl phenyl ether
4-Bromophenyl phenyl ether
Bis (2-chloroisopropyl) ether

Dimethyl phthalate
1,2-Benzanthracene
(benzo(a)anthracene)
Benzo(a)pyrene (3,4-benzopyrene)
3,4-Benzofluoranthene (benzo(b)fluoranthene)
11,12-Benzofluoranthene (benzo(k)fluoranthene)
Chrysene
Acenaphthylene
Anthracene
1,12-Benzoperylene (benzo(ghi)perylene)
Fluorene
Phenanthrene
1,2,5,6-Dibenzanthracene (dibenzo(a,h)anthracene)
Indeno(1,2,3-cd) pyrene (2,3-o-phenlene pyrene)
Pyrene

PCB-1221 (Arochlor 1221)
PCB-1232 (Arochlor 1232)
PCB-1248 (Arochlor 1248)
PCB-1260 (Arochlor 1260)
PCB-1016 (Arochlor 1016)
Toxaphene
2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)

ADEM PERMIT RATIONALE

PREPARED DATE: November 15, 2022
PREPARED BY: Scott Jackson

Permittee Name: AM/NS Calvert LLC

Facility Name: AM/NS Calvert LLC

Permit Number: AL0080233

PERMIT IS MODIFICATION

DISCHARGE SERIAL NUMBERS (DSN) & DESCRIPTIONS:

DSN001: Treated waste water from acid cleaning and nickel-plating operations.

DSN002 & DSN003: Utility wastewaters including boiler blowdown, non-contact cooling water, demineralizer blowdown/backwash water, discharge from the ASU, RO reject water, condensates, treated river water tank effluent/overflow, air conditioner unit non-contact cooling water, equipment maintenance wastewaters and vehicle rinse water, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities.

DSN004: Utility wastewaters including boiler blowdown, non-contact cooling water, demineralizer blowdown/backwash water, condensates, treated river water tank effluent/overflow, equipment maintenance wastewaters and vehicle rinse water, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities.

DSN007 & DSN011: Stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water.

DSN009 & DSN010: Stormwater runoff associated with the manufacturing of carbon steel including transportation activities, and from scrap, raw materials, and finished products unloading from river terminal, and dust suppression water.

INDUSTRIAL CATEGORY: 40 CFR Part 433 – Metal Finishing Point Source Category
433.16 Subpart A – Metal Finishing Subcategory

MAJOR: **N**

STREAM INFORMATION:

Receiving Stream:	Tombigbee River (DSN001, DSN009 & DSN010)
Classification:	Fish & Wildlife
River Basin:	Lower Tombigbee
7Q10:	1601 cfs
1Q10:	1201 cfs
Annual Average Flow:	18558 cfs
303(d) List:	YES
Impairment:	Metals (Mercury)
TMDL:	NO

Receiving Stream:	Sheppard Lake (DSN002 & DSN003)
	Unnamed Tributary to Sheppard Lake (DSN004)
	Barrow Creek (DSN007)
	Dabney Creek (DSN011)
Classification:	Fish & Wildlife
River Basin:	Lower Tombigbee
7Q10:	0.0 cfs
Annual Average Flow:	0.0 cfs
303(d) List:	NO
Impairment:	N/A
TMDL:	NO

DISCUSSION:

AM/NS Calvert LLC (AM/NS) owns and operates a carbon steel strip mill. The mill manufactures and processes carbon steel products for high-value applications. The facility produces various grades and types of steel strips with various coatings, finishes, and properties for general industrial use. Traditionally, the raw materials in the production of steel strip have been steel slabs that are barged in from overseas or local suppliers. The steel slabs are heated and rolled to form a flat strip in the Hot Strip Mill (HSM). The coils are then prepared for sales or proceed to the pickling line. After pickling, the strips may be cold-rolled in the Cold Rolling Mill (CRM) to customer specifications and then sold or further processed in the Hot Dip Galvanizing Lines (HDGL), annealed in furnaces, or temper rolled.

Wastewaters from the three steel products manufacturing products are discharged through the facility's private State Indirect Discharge (SID) Permit IU414900830 to Outokumpu Stainless USA (OTK) which holds NPDES Permit AL0079901. The facility also performs acid cleaning and nickel-plating at the site. Wastewaters generated from these operations are treated and discharged through a shared outfall with OTK to the Tombigbee River.

AM/NS is applying for modification of its NPDES Permit. The facility has planned phased construction of two melt shops which will allow the facility the capability to produce steel slabs for the strip mill onsite. Each melt shop will consist of an electric arc furnace (EAF), twin ladle metallurgy furnace (LMF), and a continuous caster. In addition to the two melt shops, the expansion will include the addition of a mold and segment shop, new contact cooling water towers, new non-contact cooling water towers, an air separation unit (ASU), an air compressor complex (ACC), scrap and raw material storage and handling operations, a slab conditioning operation for steel slabs, a new marine terminal for material handling, and slag quench/cooling and sizing operations.

Process wastewaters

The expansion is not expected to result in any impacts on the process wastewaters from the acid cleaning and nickel-plating operations discharged through Outfall DSN001. There are no modifications being proposed for this outfall in this modification. Process wastewaters resulting from the expansion including the cooling water tower blowdown and contact cooling water will be discharged through AM/NS's private SID permit for treatment and discharged to OTK. AM/NS's private SID permit and OTK's NPDES permit will be modified as necessary to address the new process discharges resulting from the expansion.

Air Separation Unit (ASU)

An ASU is being installed at the facility which will produce discharges consisting of condensate, non-contact cooling water, and cleaning waters. The discharge from the ASU is subject to 40 CFR Part 415 – Inorganic Chemical Manufacturing Point Source Category effluent guidelines, specifically 40 CFR Part 415.192 Subpart AW – Oxygen and Nitrogen Production Subcategory. AM/NS is requiring Linde, Inc. to meet the effluent guideline limitations and to apply for and obtain a private State Indirect Discharge (SID) permit to discharge the ASU wastewater to AM/NS.

Non-contact cooling water (NCCW), ACC condensate, and Reverse osmosis (RO) reject water
Reject water from the RO system will either be recycled back into the process or discharged through AM/NS's private SID permit to OTK for treatment and discharge. Any RO reject water that is left over and not used will be sent to Pond 1 and discharged through Outfalls DSN002 and DSN003. Additionally, NCCW from the melt shops and condensate from the ACC will be discharged through DSN002 and DSN003.

Stormwater
Stormwater runoff at the site is managed primarily by three drainage basins: Pond 1, Pond 2, and Pond 4. Stormwater runoff from the area around the new melt shops and areas associated with raw materials and finished products unloading, storage, and handling, and stormwater from the baghouse area is combined with stormwater from the southern portion of the CRM, HSM, scrap yard, and slab yard flows into Pond 1 which discharges to Outfalls DSN002 and DSN003. Stormwater from the HDGL, north side of CRM, and administration building flows into Pond 2 which discharges to Outfall DSN004. Stormwater from the main entrance, the mold and segment shop area, the steel warehouse area, the spare parts and maintenance products storage area, and undeveloped area southwest of the mill flows into Pond 4 which discharges to Outfall DSN007. Stormwater from the new marine terminal will be collected by a drain system and sent through an oil/water separator to Harbor Pond which discharges to Outfall DSN009. Stormwater from the existing marine terminal and tugboat berths will discharge to Outfalls DSN009 and DSN010. Stormwater from portions of the area around the mold and segment shop will flow to a small pond and then to Outfall DSN011.

Dust suppression water
Water used for dust suppression throughout the facility will be industrial treated river water and/or recycled stormwater commingled with non-process wastewaters from Ponds 1 and 2. Depending on weather and soil conditions, dust suppression water may be discharged to any of the facility's stormwater outfalls.

Based on the data and information submitted in the application for modification, the characteristics and nature of the stormwater and non-process wastewater discharges from AM/NS are not expected to be significantly altered with the new additions of the melt shops, mold and segment shop, and supporting facilities. The current parameters of concern included in the outfalls being modified are expected to remain protective of the existing discharges and the discharges resulting from the expansion. The outfall descriptions for Outfalls DSN002, DSN003, DSN004, DSN007, DSN009, DSN010, and DSN011 will be updated to reflect new discharges resulting from the facility's expansion.

Outfall DSN011
The facility has requested to reduce the monitoring frequency at Outfall DSN011 from quarterly to semi-annual. Based on historical DMR data submitted by the facility, data submitted in the modification application, and that the outfall is not expected to receive additional discharges as a result of the expansion project, it is proposed to reduce the monitoring frequency at DSN011 from quarterly to semi-annual. There are no changes being made to the pollutants of concern or the existing limitations.

Representative Sampling (DSN009 & DSN010)
The facility has requested to allow for representative sampling of Outfall DSN009 for Outfall DSN010. DSN009 receives most of the stormwater from the existing marine terminal and will receive the stormwater from the new marine terminal once installation is complete. Based on historical DMR data submitted by the facility, data submitted in the modification application, similar sources contributing to DSN009 and DSN010, and DSN009 receiving a majority of the stormwater flow, representative sampling of DSN009 for DSN010 is proposed in this modification. There are no changes being made to the pollutants of concern, existing limitations, or monitoring frequencies.

Total Recoverable Mercury
The footnote for mercury which states "EPA Method 1631E/1669 shall be used for the determination of compliance with this parameter." is being removed from all outfalls in this permit modification. The test procedures for the analysis of pollutants shall conform to 40 CFR Part 136. An updated footnote for mercury will read, "See Part I.B.2 for testing methods."

Cooling Water Intake Structure (CWIS) Requirements
The Permittee receives its cooling water from OTK whose intake structure has been determined to meet the BTA requirements in accordance with section 316 (b) of the federal Clean Water Act.

Anti-degradation
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 for new and expanded discharges and the anti-degradation rationales are attached.

December 22, 2022 Revision

The facility submitted comments on the draft permit on December 16, 2022 (see attached). The response and/or revision to each comment is addressed below:

- Once-through non-contact cooling water from the air conditioner units is being added a source to the discharges through Outfalls DSN002 and DSN003.

- The outfall descriptions for Outfalls DSN002, DSN003, and DSN004 have been updated to reflect the requested revisions as noted in the facility's application.

- Inadvertent typographical errors have been corrected in the above rationale.

ANTIDEGRADATION RATIONALE

Permit Number:	**AL0080233**
Facility Name:	**AM/NS Calvert LLC**
Receiving waters:	**Sheppard Lake, Unnamed tributary to Sheppard Lake, Barrow Creek, Dabney Creek**
Stream Category:	**Tier 2 as defined by ADEM Admin. Code 335-6-10-.12**
Discharge Description:	**Non-process wastewaters and stormwater**

The following preliminary determination was prepared in accordance with ADEM Admin. Code 335-6-10-.12 (7) (c):

The Department has reviewed the information submitted by applicant in accordance with ADEM Admin. Code 335-6-10-.12 (9). The applicant has demonstrated that there are no alternative options which are economically feasible or technically viable. In the case of technically viable options, the applicant has shown them to be cost prohibitive through the alternatives analysis required by the permit application.

The permit applicant has indicated that the following economic and/or social benefits will result from the issuance of this permit:

- The expansion will require an additional 200 new employees for the operation of the electric arc furnace and supporting facilities.
- The Permittee will pay $2,798,495 in state and local taxes associated with the addition of the electric arc furnaces and supporting facilities.
- The Permittee will have the ability to provide emergency response services to the local community.
- The Permittee will invest $290,000 in the local community, pay $1,999,022,544 in employee wages and benefits, and generate $138,176,000 in revenue to locally sourced engineering services and labor during construction of the electric arc furnaces and supporting facilities.
- Alternative discharge options are not viable due to, but not limited to, the following: a majority of the water needing disposal being stormwater which would require a large application site and could not be applied during or after storm events, introduction of stormwater to a publically owned treatment works is prohibited under local ordinances, relocation would require additional construction which would increase the likelihood of unpermitted discharges and impact nearby wetlands, and injection of the water could impact underlying groundwater resources and also result in unpermitted discharges.

The Department has determined that the discharge as proposed by the permit applicant is necessary for important economic and social development in the area in which the receiving water is located.

Prepared By: **Scott Ramsey**
Date: **November 15, 2022**

Jackson, Scott A

Subject: RE: AM/NS NPDES Draft Permit Comments

From: Singleton, Corey <corey.singleton@arcelormittal.com>
Sent: Friday, December 16, 2022 4:04 PM
To: Jackson, Scott A <scott.jackson@adem.alabama.gov>
Cc: Hall, Johnathan <johnathan.hall@jacobs.com>; Dean, Glenda <glenda.dean@jacobs.com>; Hernaez, Olivia <olivia.hernaez@arcelormittal.com>
Subject: AM/NS NPDES Draft Permit Comments

Good Afternoon Scott,

Please find the attached draft comments for AM/NS NPDES draft permit. A hard copy is being sent out to you today. Please let us know if you have any questions or concerns.

Thanks

Corey Singleton | Sr. Environmental Engineer, Steelmaking

AM/NS Calvert

A joint venture between ArcelorMittal and Nippon Steel Corporation

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AM/NS CALVERT

December 16, 2022

Scott Ramsey, Chief
Alabama Department of Environmental Management
Industrial Section
Water Division
PO Box 301463
Montgomery, Al 36130-1463

Subject: Comments on Draft Permit Modification for NPDES Permit AL0080233 (Dated November 28, 2022)

Dear Mr. Ramsey:

AM/NS Calvert LLC has received the above-referenced draft permit modification for the AM/NS Calvert LLC facility and has prepared the following comments on the draft permit modification for your consideration.

Comment 1:

AM/NS requests that the following outfall descriptions are amended in accordance with the application submitted for the NPDES permit modification. In addition, AMNS requests that air conditioner unit once-through non-contact cooling water is added to the outfall description for DSN002Q and DSN003Q. Attachment A for EPA Form 2E and Attachment C for EPA Form 2F has been amended and is attached to this letter. The requested revisions (indicated in bold) are as follows for each outfall.

DSN002Q and DSN003Q: ***Utility wastewaters including*** boiler blowdown, non-contact cooling water, ***demineralizer blowdown/backwash water,*** discharge from the ASU, RO reject water, ~~***air compressor***~~ condensate***s, treated river water tank effluent/overflow;*** **air conditioner** ***unit non-contact cooling water***, equipment maintenance wastewaters ***and vehicle rinse water***, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities.

AM/NS Calvert
P. O. Box 456
Calvert, Alabama 36513

T: +1 (251) 289-3000
www.arcelormittal.com

ArcelorMittal NIPPON STEEL

A joint venture between ArcelorMittal and Nippon Steel Corporation

AM/NS CALVERT

DSN004Q: ***Utility wastewaters including*** boiler blowdown, non-contact cooling water, ***demineralizer blowdown/backwash water,*** ~~***air compressor***~~ condensates, ***treated river water tank effluent/overflow***; equipment maintenance wastewaters ***and vehicle rinse water***, emergency fire and dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel including transportation equipment activities.

Please contact me at your earliest convenience if you have any questions or concerns about our comments, or if you anticipate any delays in issuing the final NPDES permit modification.

Thank you for considering our comments in a timely manner.

Sincerely,

Phil Fultz, Chief Operating Officer
AM/NS Calvert LLC

Attachment

- Amended EPA Application Form 2E Attachment A
- Amended EPA Application Form 2F Attachment C

AM/NS Calvert
P. O. Box 456
Calvert, Alabama 36513

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ArcelorMittal NIPPON STEEL

A joint venture between ArcelorMittal and Nippon Steel Corporation

EPA Form 2E

Attachment A. AM/NS Calvert LLC Wastewater Sources

Outfall	Wastewater Sources
DSN002 & DSN003	Utility wastewaters including those listed below
	Condensates
	Non-contact cooling water
	Boiler blowdown
	Demineralizer blowdown/backwash water
	Equipment/vehicle rinse waters
	Fire suppression water
	Dust suppression water
	RO reject water
	Treated river water tank effluent/overflow
	Air separation unit (ASU) condensate, non-contact cooling water, and cleaning waters
	Stormwater associated with carbon steel manufacturing and processing
	Air conditioner unit once-through non-contact cooling water

Note: DSN 002 and DSN 003 discharge from Pond 1. They are considered significantly similar outfalls. DSN002 is sampled and DSN 003 is not required to be sampled.

EPA Form 2F
Attachment C. AM/NS Calvert LLC Wastewater Sources

Outfall	Wastewater Sources
DSN002 & DSN003	Utility wastewaters including those listed below
	Condensates
	Non-contact cooling water
	Boiler blowdown
	Demineralizer blowdown/backwash water
	Equipment/vehicle rinse waters
	Fire suppression water
	Dust suppression water
	RO reject water
	Treated river water tank effluent/overflow
	Air separation unit (ASU) condensate, non-contact cooling water, and cleaning waters
	Stormwater associated with carbon steel manufacturing and processing
	Air conditioner unit once-through non-contact cooling water
DSN004	Utility wastewaters including those listed below
	Condensates
	Boiler blowdown
	Demineralizer blowdown/backwash water
	Equipment/vehicle rinse water
	Fire suppression water
	Dust suppression water
	Non-contact cooling water
	Treated river water tank effluent/overflow
	Stormwater associated with Carbon Steel Manufacturing
DSN007	Stormwater associated with Carbon Steel Manufacturing including the Mold and Segment Shop
	Dust suppression water
DSN009 & DSN010	Stormwater associated with Carbon Steel Manufacturing including scrap and material handling, the Melt Shops, and the marine terminal
	Dust suppression water
DSN011	Storm water associated with Carbon Steel Manufacturing
	Dust suppression water

Note: DSN 002 and DSN 003 discharge from Pond 1. They are considered significantly similar outfalls. DSN002 is sampled and DSN003 is not required to be sampled.

Digitally signed by:
GlobalSign RSA OV SSL CA 2018
Date: 2022.09.28 10:19:40 -05:00
Reason: Submission Data
Location: State of Alabama

NPDES Individual Permit Mod/Reissue (Form 187) - Supplementary Information for Industrial Facilities

version 2.4

(Submission #: HPM-VF4N-24WC5, version 1)

Details

Submission ID HPM-VF4N-24WC5

Form Input

General Instructions

This form should be used to submit the following permit requests for permitted Industrial Individual NPDES facilities

-Permit Transfers
-Permittee/Facility Name Changes
-Minor Modifications, for example:
> Frequency of monitoring or reporting modifications
> Changes to interim compliance dates in a schedule of compliance, not including the final compliance date.
> Removal of a point source outfall, provided the discharge is terminated and does not result in discharge of pollutants from other outfalls, except in accordance with permit limits.
-Major Modifications, (Any modifications not covered by minor mod◆s, whether Effluent Limit changes occur or not)
-Reissuances
-Reissuance of a permit due to approaching expiration
-Revocation and Reissuance of permit prior to its scheduled expiration

Applicable Base Fees:
-Permit Transfers and/or Permittee/Facility Name Changes
> $800
-Minor Modifications (see examples above)
> $3,940 (Major Sources)
> $3,120 (Minor Sources)
-Major Modifications
> $17,990 (Major Sources)
> $5,615 (Minor Sources)
-Reissuances
> $17,990 (Major Sources)
> $5,615 (Minor Sources)

For assistance, please click here to determine the permit staff responsible for the site or call (334) 271-7943

Processing Information

Purpose of Application
Minor Modification

Please indicate if the Permittee is applying for a permit transfer and/or name change in addition to permit modification or reissuance:
None

Action Type
Minor Modification

Brief description of the action/change that has resulted in the request for this permit modification:
AM/NS Calvert LLC is adding two electric arc furnaces and supporting facilities to the facility to produce steel slabs on site. This permit modification is to cover the new industrial activities on the site for the electric arc furnaces and their supporting facilities.

For your minor modifications, please attach the supporting information detailing the changes at this facility requiring this minor modification request:
AMNS_Permit_Application_Supplemental_Information.pdf - 09/20/2022 09:37 PM
Comment
The attached file contains detailed information describing the facility changes associated with the addition of the electric arc furnaces and supporting facilities.

General Information

SID Permit Number (if your facility currently holds an SID permit, please provide that number below):
IU414900830

NPDES or General Permit Numbers (if applicable, please list all permit numbers):
AL0080233

Is this facility/site only applying for permit coverage for discharges from stormwater?
No

Permit Information

Permit Number
AL0080233

Current Permittee Name
AM/NS CALVERT LLC

Permittee

Permittee Name
AM/NS CALVERT LLC

Mailing Address

1 AM/NS Way

Calvert, AL 36513

Responsible Official

Prefix
Mr.

First Name	Last Name
Phil	*Fultz*

Title
Chief Operating Officer

Organization Name
AM/NS Calvert LLC

Phone Type	Number	Extension
Business	251-289-3000	

Email
phil.fultz@arcelormittal.com

Mailing Address

1 AM/NS Way

Calvert, AL 36513

Existing Permit Contacts

Affiliation Type	Contact Information	Remove?
Permittee	AM/NS CALVERT LLC	NONE PROVIDED
Environmental Contact,Facility Contact	Olivia Hernaez	NONE PROVIDED
Responsible Official,Notification Recipient	Phil Fultz	NONE PROVIDED
DMR Contact	Ralph Lopez, AM/NS Calvert	NONE PROVIDED
Facility Contact	Robert Pinckard	NONE PROVIDED

Facility/Site Information

Facility/Site Name
AM/NS Calvert LLC

Organization/Ownership Type
LLC

Facility/Site Address or Location Description
1 AM/NS Way
Calvert, AL 36513

Facility/Site County
Mobile

Detailed Directions to the Facility/Site
NONE PROVIDED

Facility Map
AMNS_Facility_Map.pdf - 09/20/2022 09:43 PM
Comment
NONE PROVIDED

Please refer to the link below for Lat/Long map instruction help:
Map Instruction Help

Facility/Site Front Gate Latitude and Longitude
31.143803782603285,-87.99929492469788

SIC Code(s) [Please enter Primary SIC Code first followed by any additional applicable SIC Codes]
3316-Cold-Rolled Steel Sheet Strip and Bars
3312-Steel Works Blast Furnaces (Including Coke Ovens) and Rolling Mills
3471-Electroplating Plating Polishing Anodizing and Coloring

NAICS Code(s) [Please enter Primary NAICS Code first followed by any additional applicable NAICS Codes]
331110-Iron and Steel Mills and Ferroalloy Manufacturing
331221-Rolled Steel Shape Manufacturing
332813-Electroplating Plating Polishing Anodizing and Coloring

Facility/Site Contact

Prefix
Mr.

First Name	Last Name
Robert	*Pinckard*

Title
Environmental Manager

Organization Name
AM/NS Calvert, LLC

Phone Type	Number	Extension
Business	2512894424	
Mobile	2512146895	

Email
robert.pinckard@arcelormittal.com

Address
PO Box 456
Calvert, AL 36513

DMR Contact(s) (1 of 1)

DMR Contact

Prefix
Ms.

First Name	Last Name
Olivia	*Hernaez*

Title
Mfg. Technology - Environmental

Phone Type	Number	Extension
Business	2512894385	

Email
olivia.hernaez@arcelormittal.com

Address
PO Box 456
Calvert, AL 36513

Additional Attachments

Please attach any additional information as needed.
ADEM_Form_187_complete_with_attachments.pdf - 09/20/2022 09:48 PM
EPA_Form_1_complete_with_attachments.pdf - 09/20/2022 10:04 PM
EPA_Form_2D_complete.pdf - 09/20/2022 10:07 PM
EPA_Form_2E_Outfall_complete_with_attachments.pdf - 09/20/2022 10:10 PM
EPA_Form_2F_complete_with_attachments.pdf - 09/20/2022 10:19 PM

Comment
An electronic version of ADEM Form 187, EPA Form 1, EPA Form 2D, EPA Form 2E, and EPA Form 2F with referenced attachments are included here.

Application Preparer

Application Preparer

Prefix
NONE PROVIDED

First Name	Last Name
Johnathan	*Hall*

Title
NONE PROVIDED

Organization Name
Jacobs Engineering Group Inc.

Phone Type	Number	Extension
Mobile	251-593-1093	

Email
johnathan.hall@jacobs.com

Address
4121 CARMICHAEL RD
STE 400
MONTGOMERY, AL 36106

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- ☑ I am the owner of the account used to perform the electronic submission and signature.
- ☑ I have the authority to submit the data on behalf of the facility I am representing.
- ☑ I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- ☑ I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

"I certify under penalty of lawthat 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."

"I further certify under penalty of lawthat all analyses reported as less than detectable in this application or attachments thereto were performed using the EPA approved test method having the lowest detection limit for the substance tested."

NOTE: 335-6-5-.14 SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS.
The application shall be signed by a responsible official, a request for variance from categorical pretreatment standards, and a category determination request shall be signed by a responsible official, as indicated below.

- *In the case of a corporation, by a principal executive officer of at least the level of vice president;*
- *In the case of a partnership, by a general partner;*
- *In the case of a sole proprietorship, by the proprietor; or*
- *In the case of a municipal, state, federal, or other public entity, by either a principal executive officer, or ranking elected official*

Signed By Phil Fultz on 09/28/2022 at 10:08 AM

AM/NS Calvert, LLC:
Calvert, Alabama

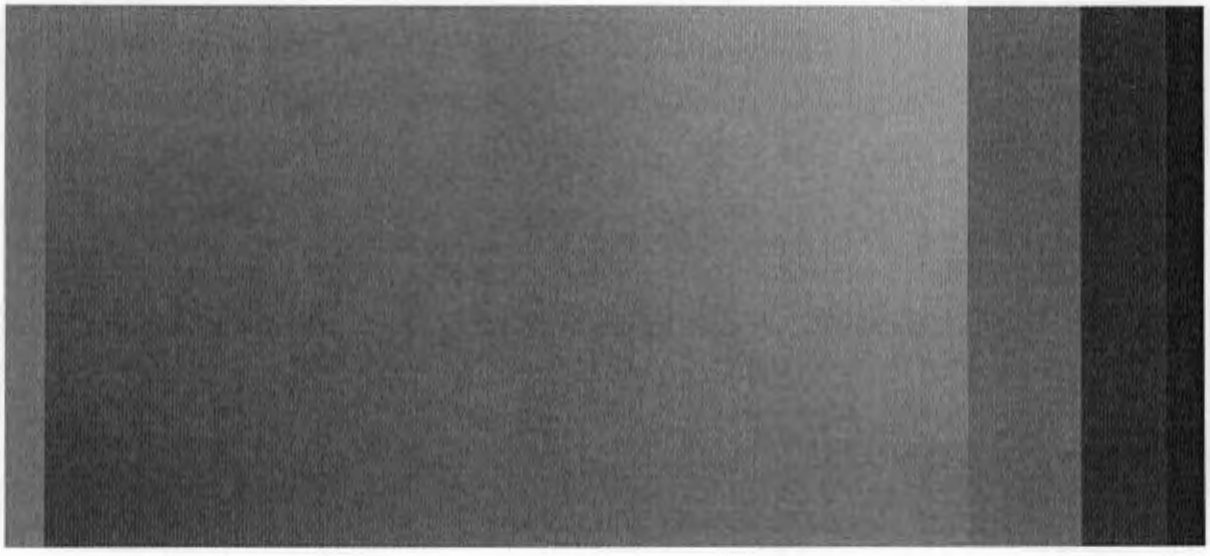
Application for Modification of NPDES Permit No. AL0080233

September 2022

Prepared by

Jacobs

Prepared for
Alabama Department of Environmental Management



ADEM Watermark

Contents

ADEM Watermark

Acronyms and Abbreviations

1Q10	Lowest 1-day average flow that occurs (on average) once every 10 years
7Q10	Lowest 7-day average flow that occurs (on average) once every 10 years
ACC	air compressor complex
ADEM	Alabama Department of Environmental Management
AM/NS	AM/NS Calvert LLC
ASU	air separation unit
BMP	best management practices
BPJ	best professional judgement
BTA	best technology available
CFR	Code of Federal Regulations
cfs	cubic feet per second
CRM	cold rolling mill
CWT	cooling water tower
DRI	direct reduced iron
EAF	electric arc furnace
ELG	Effluent Limitation Guidelines
EPA	U.S. Environmental Protection Agency
FL	finishing line
G	grab sample
GC/MS	gas chromatography/mass spectrometry
HBI	hot briquetted iron
HDGL	hot dip galvanizing lines
HSM	hot strip mill
lb/day	pounds per day
LMF	ladle metallurgy furnace
mg/L	milligrams per liter
NAFTA	North American Free Trade Agreement
NPDES	National Pollutant Discharge Elimination System
NSPS	New Source Performance Standards
OTK	Outokumpu Stainless USA, LLC
RO	reverse osmosis

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SID	State Indirect Discharge
SPCC	spill prevention control and countermeasures
s.u.	standard units
T	total
TBEL	technology-based effluent limitation
TMDL	total maximum daily load
TR	total recoverable
WQBEL	water quality-based effluent limitation

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1. Introduction

AM/NS Calvert, LLC (AM/NS) owns and operates a carbon steel strip mill in Calvert, AL. The mill manufactures and processes carbon steel products for high-value applications by manufacturers in North America and throughout the North American Free Trade Agreement (NAFTA) region.

1.1 Facility Description

The facility can produce various grades and/or types of steel strips in various forms (i.e., coils, slits, sheets, etc.) with various coatings, finishes, and properties for general industrial use. The finished products are consumed by the automotive industry, appliance industry, tube manufacturers, steel fabricators, and steel service centers, among others. The raw materials in the production of steel strip have historically been steel slabs that are barged to the facility from Brazil or received from other locations or suppliers. The steel slabs are heated and rolled to form a flat strip in the Hot Strip Mill (HSM). From the HSM, the coils (flat strips) are prepared for sales or proceed to the pickling lines. After pickling, if needed, the strips may be cold-rolled in the Cold Rolling Mill (CRM) to customer specifications and then sold or further processed in the Hot Dip Galvanizing Lines (HDGL), annealed in furnaces, or temper rolled.

1.2 Proposed Facility Modifications

AM/NS is proposing the following facility modifications: Phased construction of two (2) Melt Shops to reduce reliance on third party raw material providers. Each melt shop will consist of:

- One (1) Electric Arc Furnace (EAF)
- One (1) Twin Ladle Metallurgy Furnace (LMF)
- One (1) Continuous Caster

In addition to the Melt Shops, the project will include the addition of a Mold and Segment Shop and installation of auxiliary equipment including one (1) new contact cooling water tower (CWT), and one (1) new non-contact CWT for each Melt Shop construction phase, an air separation unit (ASU), an air compressor complex (ACC), scrap and raw material storage and handling operations, a slab conditioning operation for steel slabs, a new marine terminal for material handling, and slag quench/cooling and sizing operations.

The construction of the Melt Shops is proposed to be conducted in phases. Phase 1 (July 2023 estimated start-up) will include the installation of the first Melt Shop, contact and non-contact CWTs, ASU, ACC, degassing operation, scrap and raw material storage and handling operations, marine terminal, slag management process, and auxiliary equipment. Phase 2 will include the installation of the second Melt Shop and auxiliary equipment with an estimated start-up of July 2024.

1.2.1 Process Description and Proposed Modifications

Currently, AM/NS receives carbon steel slabs primarily by barge. The carbon steel slabs are heated and rolled to form a long strip in the HSM. After rolling, the coils are either prepared for

ADEM Watermark

sale or proceed to the pickling lines. After pickling, if needed, the strips are cold-rolled or further processed in the galvanizing lines, annealed in batch furnaces, or temper rolled.

Melt Shops

Carbon steel slabs processed in the existing steel strip mill are currently purchased from other facilities. The new Melt Shops will allow AM/NS to produce steel slabs for the strip mill at the facility in Calvert, AL. Steel scrap that is brought to the facility by truck, rail, or barge will be charged into and melted in an EAF. Molten steel will be refined to specifications in the LMF, and further impurities may be removed via degassing operations. Ladles of refined molten steel will be transferred to the continuous caster to produce slabs that will be used as feedstock for the existing strip mill.

Within the Melt Shops, AM/NS will operate each EAF in batch mode consisting of charging scrap steel and scrap substitutes, alloys, melting, and tapping. During normal operation, cold scrap metal and scrap substitutes, carbon, and fluxing agents are charged into the EAF. The combination of the heat from the arcing process, chemical reactions, and gas jets melts the scrap and scrap substitutes into molten steel. Ladles of molten steel will be transferred by crane to the new Continuous Caster. The molten steel will drain into a vertical, water-cooled mold that is the desired width and thickness of the resulting slab. The contact cooling water from the caster sprays are a closed loop system where the water is recycled back into the process. The continuous steel slab will exit at the bottom of the spray chamber where it will be torch cut at specified lengths into discreet slabs. Slab conditioning is performed to remove surface material from the cast slab and improve the surface quality of the finished steel sheet.

Cooling Water Towers

Due to additional cooling water demand for the new Melt Shops one (1) new contact cooling water tower (CWT) and (1) new non-contact CWT per Melt Shop construction phase will be installed to manage and recycle contact and non-contact water during Melt Shop operations. Wastewater blowdown from the contact CWTs will be sent to the sewer for treatment and blowdown from the non-contact CWTs will be sent to Pond 1 and discharged through outfalls DSN002/003 of the AM/NS NPDES permit (see Section 2).

The industrial water supply for the CWTs will be treated utilizing reverse osmosis (RO). The reject water from the RO system will be used as slag quench and either recycled back into the process (slag processing operations) or discharged to the sewer for treatment (see Section 2). Any RO reject water that is left over and not used for slag quench will be sent to Pond 1 and discharged through outfalls DSN002/003 of the AM/NS NPDES permit (See Section2).

Air Compressor Complex

Due to the additional demand for the Melt Shops a new Air Compressor Complex (ACC) will be installed in the vicinity of the cooling water circuit area. The ACC will provide dry air for plant processes by compressing atmospheric air to remove the moisture. Condensate and non-contact

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cooling water from the ACC will be discharged through outfalls DSN002/003 of the AM/NS NPDES permit (See Section2).

Air Separation Unit

An air separation unit (ASU) will be installed to produce high purity oxygen, nitrogen, and argon through the separation of atmospheric air by a combination of adsorption purification, cryogenic distillation, and internal compression. In carbon steel manufacturing, oxygen, nitrogen, and argon are used in the smelting process. The ASU will be installed and operated by Linde, Inc. under contract with AM/NS.

The discharges resulting from the production of oxygen and nitrogen by air liquification are subject to the effluent limitations guidelines in 40 CFR 415 (Inorganic Chemicals Manufacturing Point Source Category) Subpart AW – Oxygen and Nitrogen Production Subcategory. Based on the contractual operation of the ASU by Linde, Inc. AM/NS will be requiring Linde, Inc. to apply for and obtain a State Indirect Discharge (SID) permit to discharge wastewater to AM/NS. The wastewater and stormwater from the ASU will be discharged by Linde, Inc to a surface ditch, gravity flow to AM/NS Pond 1 and be discharged through outfalls DSN002/003 of the AM/NS NPDES permit (see Section 2).

Mold and Segment Shop

A Mold and Segment Shop will be constructed to support the operations conducted in the new Melt Shops. Activities conducted in the Mold and Segment will consist of fabrication of steel equipment modules and assembled segment parts used in the Melt Shops, Continuous Casting lines, and maintenance for the components of the EAF, the LMF, and the Continuous Caster. Process wastewaters from the Mold and Segment Shop will be routed through an oil/water separator to the sewer for treatment (see Section 2). Stormwater runoff from the Mold and Segment Shop area will be discharged through outfall DSN007 of the AM/NS NPDES permit (see Section 2).

Scrap, Raw Materials, and Finished Products Unloading, Storage, and Handling

The Melt Shops will receive raw materials (scrap, alloys, and additives) by barge, rail, and trucks. Scrap and raw materials will be stored outside or in contained storage silos. The scrap yard will be lined and stormwater from the scrap yard will be sent through an oil/water separator to a lined pond and discharged through Pond 1 under the AM/NS NPDES Permit at outfalls DSN002/003 (see Section 2).

Due to the expected increase in raw materials and finished products received by barge, AM/NS is installing a new marine terminal. Stormwater from the new terminal will be collected by a drain system and sent through an oil/water separator to the Harbor Pond and be discharged through outfall DSN009. Stormwater from the existing marine terminal and tugboat berths will continue to discharge to the Tombigbee River through outfalls DSN009 and DSN010. The drainage areas for the new terminal and most of the existing terminal will discharge through outfall DSN009.

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Both outfalls DSN009 and DSN010 are permitted under the AM/NS NPDES Permit (see Section 2).

AM/NS is proposing to install a slag handling operation that includes the quench, storage, handling, crushing, and sizing of slag. The system will be located outside of the Melt Shops. AM/NS will be installing a drainage, collection, and recirculation system at the slag pits. This area will be graded towards the pits so that no stormwater that is in contact with the slag handling operation is discharged. AM/NS will only maintain a level of moisture in the pre-processed slag sufficient for air emission control purposes. While run-off is negligible, this area will be graded towards the pit drainage system as well. The sizing operation will consist of water sprays, and the water from the process will be recycled. The unprocessed slag will be fed into a vibrating grizzly feed hopper. The oversized slag will route to the crusher for further processing. Once the slag is sized and, if necessary, crushed it will be marketed and sold by a third party.

AM/NS is proposing to install the following silos for the storage of raw materials and baghouse dust:

- 24 silos for the storage of alloys
- Ten (10) silos for the storage of lime, dolomite, and bauxite
- Eight (8) silos for the storage of direct reduced iron (DRI)
- Five (5) silos for the storage of flux injection materials
- Four (4) silos for the storage of hot briquetted iron (HBI)
- Two (2) silos for the storage of baghouse dust

While most of the raw material will be stored in silos equipped with bag houses, wet suppression will be utilized, as appropriate, to control emissions from the raw materials, such as briquetted iron, that may also be stored outside in piles. The water used for dust suppression throughout the AM/NS facility will be industrial water, and/or recycled stormwater commingled with non-process wastewaters from Ponds 1 and 2.

With exception to the portion that sheet flows off-site to the east of the area, stormwater runoff from the raw materials, storage silo area, and finished products unloading, storage, and handling areas associated with the Melt Shops will be sent to Pond 1 and discharged through outfalls DSN002/003 of the AM/NS NPDES permit (see Section 2).

1.3 Application for NPDES Permit Modification

This NPDES permit modification application summarizes the discharge locations, outfall sampling methods and results, and derivation and discussion of requested permit limitations and monitoring requirements. The AM/NS current NPDES permit expires on January 31, 2027. This document supplements the required ADEM and EPA Forms, and AEPACS input. The sections of this document include:

- Discharge Descriptions (Section 2)
- Derivation of Permit Limitations (Section 3)

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- Requested Permit Limits and Monitoring (Section 4)

2. Discharge Descriptions

Process Wastewaters

Wastewaters from the existing HSM, CRM, and HDGL manufacturing processes are discharged through the AM/NS private State Indirect Discharge (SID) permit (IU 41-49-00830) to Outokumpu Stainless USA LLC (OTK) for treatment and discharge to the Tombigbee River under OTK's NPDES permit (AL0079901). The addition of the Melt Shops, the Mold and Segment Shop, and auxiliary facilities will not result in any impacts on existing process wastewaters discharged to OTK from the HSM, CRM, and HDGL manufacturing processes.

Wastewater from the existing acid cleaning and nickel-plating operations are treated and discharged to the Tombigbee River through the outfall line shared with OTK under the AM/NS NPDES permitted outfall DSN001. Wastewaters from the acid cleaning and nickel-plating operations are subject to the 40 CFR 433 (Metal Finishing Point Source Category) Subpart A – Metal Finishing Subcategory New Source Performance Standards (NSPS). The addition of the Melt Shops and its ancillary facilities will not result in any impacts on the process wastewaters from the acid cleaning and nickel-plating operations discharged through the AM/NS NPDES permitted outfall DSN001.

Process wastewaters resulting from the addition of the Mold and Segment Shop, and Melt Shops, including the contact CWT blowdown from the continuous caster and contact cooling water for the slag quench will be discharged through the AM/NS private State Indirect Discharge permit IU 41-49-00830 to OTK for treatment and discharge to the Tombigbee River under OTK's NPDES permit (AL0079901). Reject water from the RO system that is used as slag quench will either be recycled back into the process (slag processing operations) or discharged through the AM/NS private SID permit to OTK for treatment and discharge. Any RO reject water that is left over and not used for slag quench will be sent to Pond 1 and discharged through outfalls DSN002/003 of the AM/NS NPDES permit. The AM/NS SID permit and OTK NPDES permit will be modified as necessary to address process wastewaters resulting from the addition of the new Mold and Segment Shop and Melt Shops including supporting facilities.

Stormwater and Non-Process Wastewaters

The exiting HSM, CRM, HDGL, and Finishing Line (FL) are located inside buildings. The new Melt Shops will also be located inside buildings. Material storage and handling areas, including carbon steel slabs and finished products (steel coils), and scrap are located outside and exposed to stormwater. The addition of the new Melt Shops will result in an increase in stormwater runoff associated with scrap, raw materials, and finished products unloading, storage, and handling.

Stormwater runoff associated with all the manufacturing operations at the site is addressed in the site Best Management Practices Plan (BMP Plan). Fuel and oil stored in above-ground tanks that may be exposed to stormwater are addressed in the site Spill Prevention, Control, and Countermeasures Plan (SPCC).

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Stormwater runoff is managed primarily by three drainage basins (Ponds 1, 2 and 4) as described in Table 2.1. Stormwater runoff from the area around the new Melt Shops and areas associated with raw materials and finished products unloading, storage, and handling, and stormwater from the baghouse area is routed along with the stormwater from the southern portion of the CRM, HSM, scrap yard, and slab yard into Pond 1 (Outfalls DSN002/003). Stormwater from the HDGL, north side of CRM, and administration building flows into Pond 2 (Outfall DSN004). Stormwater from the main entrance, the Mold and Segment Shop area, the Steel Warehouse area (acid pickling of coils conducted inside), the Klockner Warehouse area (spare parts and maintenance products storage inside), and undeveloped area southwest of the mill flows south to Pond 4 (Outfall DSN007). Stormwater from the new marine terminal will be collected by a drain system and sent through an oil/water separator to the Harbor Pond (Outfall 009). Stormwater from the existing marine terminal and tugboat berths will continue to discharge to the Tombigbee River through outfalls DSN009 and DSN010. However, most of stormwater from the existing marine terminal discharges through DSN009. Stormwater from portions of the area around the Mold and Segment Shop will flow to Dabney Creek from a small pond through outfall DSN011.

Non-contact cooling water from Melt Shops, condensate from the ACC, and any RO reject water that is left over and not used for slag quench will be sent to Pond 1 and discharged through outfalls DSN002/003 of the AM/NS NPDES permit.

Additionally, water used for dust suppression throughout the AM/NS facility will be industrial treated river water, and/or recycled stormwater commingled with non-process wastewaters from Ponds 1 and 2. Depending on weather and soil conditions dust suppression water may on occasion discharge to any of the facility's stormwater outfalls.

2.1 Description of Outfalls

The AM/NS facility currently has eight permitted outfalls:

Table 2.1 Outfall Descriptions

Outfall	Receiving Water	Description of Existing Sources	Modified Description Based on New Sources Added	Requested Outfall Description
DSN001	Tombigbee River	Treated wastewater from acid and nickel-plating operations	Not applicable. No new sources added.	Treated wastewater from acid and nickel-plating operations
DSN002 and DSN003	Sheppard Lake	Non-contact cooling water, water tank effluent overflow, boiler blowdown, demineralizer blowdown/backwash, equipment/vehicle rinse water, emergency fire suppression water, compressor condensate, and stormwater runoff	Pond 1 consisting of non-contact cooling water, Reverse Osmosis (RO) reject water, industrial treated river water tank effluent overflow, boiler blowdown, demineralizer blowdown/backwash, equipment/vehicle rinse water, emergency fire suppression water, air	Discharge from Pond 1 consisting of utility wastewaters including boiler blowdown, non-contact cooling water blowdown; discharge from the ASU; RO reject water, air compressor condensate and non-contact cooling water blowdown; equipment

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Table 2.1 Outfall Descriptions

Outfall	Receiving Water	Description of Existing Sources	Modified Description Based on New Sources Added	Requested Outfall Description
			compressor condensate and non-contact blowdown, Air Separation Unit (ASU) non-contact blowdown, condensate and cleaning; and stormwater runoff and dust suppression water (industrial or recycle stormwater/non-process wastewater) runoff from areas associated with the Cold Rolling Mill (CRM), Hot Strip Mill (HSM), Melt Shops, material handling, baghouse area, slab yard and scrap yard, and stormwater runoff from transportation equipment activities	maintenance wastewaters, emergency fire suppression water, dust suppression water, and stormwater water runoff associated with the manufacturing of carbon steel, including transportation equipment activities
DSN004	Unnamed Tributary to Sheppard Lake	Non-contact cooling water, water tank effluent overflow, boiler blowdown, demineralizer blowdown/backwash, equipment/vehicle rinse water, emergency fire suppression water, compressor condensate, and stormwater runoff	Pond 2 consisting of non-contact cooling water, industrial treated river water tank effluent overflow, boiler blowdown, demineralizer blowdown/backwash, equipment/vehicle rinse water, emergency fire suppression water, compressor condensate, and stormwater runoff from areas associated with the Hot Dip Galvanizing Line (HDGL), Cold Rolling Mill (CRM), and administration building, including dust suppression water (industrial or recycle stormwater/non-process wastewater), and stormwater runoff from transportation equipment activities	Discharge from Pond 2 consisting of utility wastewaters including boiler blowdown, non-contact cooling water blowdown, air compressor condensate; equipment maintenance wastewaters, emergency fire suppression water, dust suppression water, and stormwater runoff associated with the manufacturing of carbon steel, including transportation equipment activities
DSN007	Barrow Creek	Stormwater runoff associated with the manufacturing of carbon	Pond 4 consisting of stormwater runoff associated with the	Discharge from Pond 4 consisting of stormwater water runoff associated

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Table 2.1 Outfall Descriptions

Outfall	Receiving Water	Description of Existing Sources	Modified Description Based on New Sources Added	Requested Outfall Description
		steel, including transportation equipment activities	manufacturing of carbon steel, including the Mold and Segment Shop areas, the Steel Warehouse area, Klockner Warehouse area, and transportation equipment activities from the main entrance and undeveloped areas south of the mill and dust suppression water (industrial or recycle stormwater/non-process wastewater)	with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water
DSN009	Tombigbee River	Stormwater runoff associated with the manufacturing of carbon steel	Harbor Pond consisting of stormwater runoff associated with the manufacturing of carbon steel, including scrap, raw materials, and finished products unloading from the marine terminals and tugboat areas, and other transportation equipment activities and dust suppression water (industrial or recycle stormwater/non-process wastewater	Stormwater runoff associated with the manufacturing of carbon steel, including stormwater runoff from transportation equipment activities, and stormwater runoff from scrap, raw materials, and finished products unloading from the river terminal and tugboat areas, and dust suppression water
DSN010	Tombigbee River	Stormwater runoff associated with the manufacturing of carbon steel	Stormwater runoff associated with the manufacturing of carbon steel, including scrap, raw materials, and finished products unloading from the marine terminals and tugboat areas, and other transportation equipment activities and dust suppression water (industrial or recycle stormwater/non-process wastewater	Stormwater runoff associated with the manufacturing of carbon steel, including stormwater runoff from transportation equipment activities, and stormwater runoff from scrap, raw materials, and finished products unloading from the river terminal and tugboat areas, and dust suppression water
DSN011	Dabney Creek	Stormwater runoff associated with the manufacturing of carbon steel, including	Stormwater runoff associated with the manufacturing of carbon steel, including transportation equipment	Stormwater water runoff associated with the manufacturing of carbon steel, including transportation equipment

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Table 2.1 Outfall Descriptions

Outfall	Receiving Water	Description of Existing Sources	Modified Description Based on New Sources Added	Requested Outfall Description
		transportation equipment activities	activities and dust suppression water (industrial or recycle stormwater/non-process wastewater)	activities, and dust suppression water

3. Derivation of Permit Limitations

This section discusses the applicable technology-based effluent limitations (TBELS) and water quality-based effluent limitations (WQBELs) for the AM/NS NPDES permit modification.

3.1 Applicable Effluent Limitation Guidelines

Process Wastewaters (SID Permit and DSN001)

Process wastewaters from the existing three steel manufacturing processes (HSM, CRM, and HDGL) are discharged through the AM/NS private State Indirect Discharge (SID) permit IU 41-49-00830 to Outokumpu Stainless USA, LLC (OTK) for treatment and discharge to the Tombigbee River under OTK's NPDES permit (AL0079901). The addition of the Melt Shops, Mold and Segment Shop, and auxiliary facilities will not result in any impacts on existing process wastewaters discharged to OTK from the HSM, CRM, and HDGL manufacturing processes.

Process wastewater from the acid cleaning and nickel-plating operations are treated and discharged to the Tombigbee River through the outfall line shared with OTK under the AM/NS NPDES permitted outfall DSN001. Process wastewaters from the acid cleaning and nickel-plating operations are subject to the EPA Federal Effluent Limitations Guidelines (ELGs) at 40 CFR 433 (Metal Finishing Point Source Category) Subpart A – Metal Finishing Subcategory New Source Performance Standards (NSPS) in 40 CFR 433.16. The addition of the Melt Shops, the Mold and Segment Shop, and its auxiliary facilities will not have an impact on the acid cleaning and nickel-plating process wastewaters discharged through Outfall DSN001.

Process wastewaters from the Melt Shops, the Mold and Segment Shop, and auxiliary facilities will be discharged through the AM/NS private SID permit to OTK for treatment and discharge to the Tombigbee River under OTK's NPDES permit. Prior to discharge, both the AM/NS SID permit and OTK NPDES permit will modified as necessary to address wastewaters resulting from the addition of the new Melt Shops, Mold and Segment Shop, and supporting facilities. Since the SID permit for AM/NS is discharged to a privately-owned treatment works, not a publicly-owned treatment works, the EPA Federal Pretreatment ELGs for Iron and Steelmaking are not applicable to the AM/NS indirect discharges to OTK. However, the Melt Shop process wastewater discharges through the OTK NPDES permit are subject to EPA Federal ELGs for the Iron and Steel

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Manufacturing Point Source Category (40 CFR 420) and will be applied in the modified NPDES permit for OTK. The applicable ELGs from 40 CFR 420 are:

- Subpart (D) Steelmaking -420.46(a) Electric Arc Furnace Steelmaking – semi-wet; or 40 CFR 420.44 (c) –Electric Arc Furnace Steelmaking – wet; and
- Subpart (F) Continuous Casting Subcategory-40 CFR 420.64

3.2 Technology-Based Effluent Limitations (TBELs) and/or Best Professional Judgement (BPJ) Limitations

Stormwater Runoff and Non-Process Wastewaters (DSN002/003, DSN004, DSN007, DSN009/010 and DSN011)

The proposed discharges from the new Melt Shops will consist of stormwater runoff and non-process wastewaters, including dust suppression water consisting of industrial water and/or recycled stormwater and non-process wastewaters from Ponds 1 and 2. All non-process wastewaters will be discharged along with stormwater runoff from manufacturing areas to two existing large capacity retention ponds (Ponds 1 and 2). Given the large capacities of the retention ponds, discharges are expected to occur only during significant storm events. Stormwater runoff from the remaining manufacturing areas will be discharged either through the Harbor Pond, the other two retention ponds or through drainage ditches.

In the current AM/NS NPDES permit, the pollutants of concern for all the stormwater and non-process outfalls listed are pH, total suspended solids (TSS), oil and grease (O/G), chromium (Cr, T), lead (Pb, T), zinc (Zn, T), mercury (Hg, TR), and chemical oxygen demand (COD). With exception for a best professional judgement (BPJ) limitation for oil and grease, the permit requires monitoring only for the pollutants of concern. Total residual chlorine and temperature are not considered pollutants of concern given all non-process wastewaters are discharged through retention ponds with long holding times.

A BPJ daily maximum permit limitation of 15 mg/l for oil and grease is imposed on all stormwater and non-process wastewater outfalls. The BPJ limitation is expected to be achievable for stormwater runoff through implementation of Best Management Practices (BMPs). Where necessary, for non-stormwater discharges the use of oil/water separators are expected to be utilized. The use of BMPs and oil/water separators have both been demonstrated to prevent the occurrence of a visible oil sheen on receiving waters.

It is not expected that the characteristics and nature of the stormwater and non-process wastewater discharges from AM/NS will be significantly altered because of the addition the new Melt Shops, the Mold and Segment Shop, and supporting facilities; therefore, the existing NPDES permit limitations are requested to be continued in the NPDES Permit Modification.

3.2.1 Cooling Water Intake Requirements

If an entity provides water to the Permittee which is used for cooling by means of a surface water intake, the intake structure operated by the entity must be determined to represent the best technology available (BTA) to minimize adverse environmental impact in accordance with

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Section 316(b) of the federal Clean Water Act (33 U.S.C. Section 1326) and rules adopted under this Section. If the entity's intake structure does not represent BTA, the Permittee must obtain water for cooling purposed from another source. AM/NS receives its cooling water from OTK whose intake structure has been determined to meet BTA in accordance with Section 316(b) of the federal Clean Water Act.

3.3 Water Quality-Based Effluent Limitations

3.3.1 Receiving Water Characteristics

The characteristics for the receiving streams for the stormwater and non-process water outfalls which are the subject of the NPDES permit modification request are listed in Table 3.1.

Table 3.1 Receiving Waters Characteristics

Outfall	Receiving Water	Stream Classification	$7Q_{10}$ (CFS)	$1Q_{10}$ CFS)	Annual Average Flow (CFS)	§303(d) List	Impaired	TMDL
DSN002/003	Sheppard Lake	Fish and Wildlife	0.0	0.0	0.0	No	No	N/A
DSN004	UT to Sheppard Lake	Fish and Wildlife	0.0	0.0	0.0	No	No	N/A
DSN007	Barrow Creek	Fish and Wildlife	0.0	0.0	0.0	No	No	N/A
DSN009/010	Tombigbee River	Fish and Wildlife	1,601	1,201	18,558	Mercury	Yes	No
DSN011	Dabney Creek	Fish and Wildlife	0.0	0.0	0.0	No	No	N/A

3.3.2 Reasonable Potential Analysis

A Reasonable Potential Analysis was conducted for the 2022 NPDES permit renewal and the discharges from AM/NS were determined not to pose a potential to cause or contribute to a violation of the applicable Alabama Water Quality Criteria. The proposed increases in stormwater and wastewaters resulting from the operation of the new Melt Shops, the Mold and Segment Shop, and supporting facilities are not expected to change the parameters of concern, or the results of the Reasonable Potential Analysis previously conducted during the 2022 permit renewal; therefore, WQBELs are not deemed necessary.

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The Tombigbee River is on Alabama's §303(d) List for impaired streams for Mercury. All the receiving streams listed in Table 3.1 are within 24-hr travel time to the Tombigbee River; however, the discharges from these outfalls are not expected to contribute to the impairment. As in the existing NPDES permit, it is expected that monitoring for mercury will continue in the modified permit to provide data for future Total Maximum Daily Load (TMDL) development. However, in consideration of the complexities in conducting low level sampling and analysis methodologies during storm water events, AM/NS requests that the requirement to use EPA Method 1631E/1669 for total recoverable mercury in the current NPDES permit is removed.

3.3.3 Antidegradation Demonstration

The manufacturing operations and auxiliary activities associated with the new Melt Shops, Mold and Segment Shop, and supporting facilities will result in new or increased discharges of stormwater runoff and wastewaters to high quality waters (Tier II Waterbodies) as defined by ADEM Admin. Code r. 335-6-10-.12(4). Therefore, in accordance with Antidegradation requirements established at 40 CFR 131.12 and ADEM Admin. Code r. 335-6-10-.04, it is the responsibility of AM/NS in the application for modification of the AM/NS NPDES permit to demonstrate the social and economic importance of the proposed additions to the facility. The antidegradation demonstration is included as part of ADEM Form 187 in the application.

4. Requested Permit Limits and Monitoring

This section presents the requested permit limitations and monitoring requirements for the AM/NS NPDES permit modification. It is not expected that the characteristics and nature of the stormwater and wastewater discharges from AM/NS will be significantly altered because of the addition the new Melt Shops, the Mold and Segment Shop, and associated auxiliary operations. Therefore, the parameters of concern and existing limitations and monitoring frequencies, with exception to the monitoring frequency for DSN011, are requested to be to be continued in the modified AM/NS NPDES permit. AM/NS requests that the monitoring frequency for all parameters listed for DSN011 are revised from once per quarter to semi-annual. This request is based on DSN011 will not receive additional discharges as a result of the new operations, and a review of historical monitoring data indicates all parameters are either non-detect or are present at levels below concern (Table 4.1).

Table 4.1 DSN011 DMR Data Summary

Parameter (units)	Current Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Range of Monitoring Results
Flow (mgd)	Monitor	1/quarter	0.0162 – 1.32
pH (s.u.)	Monitor [1/]	1/quarter	6.96 – 8.75
Total Suspended Solids (mg/L)	Monitor	1/quarter	6 – 69.6
Oil and Grease (mg/l)	15	1/quarter	ND
Chromium, Total (mg/l)	Monitor	1/quarter	ND – 0.011

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Table 4.1 DSN011 DMR Data Summary

Parameter (units)	Current Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Range of Monitoring Results
Lead, Total (mg/l)	Monitor	1/quarter	ND – 0.00136
Nickel, Total (mg/l)	Monitor	1/quarter	ND – 0.00287
Zinc, Total (mg/l)	Monitor	1/quarter	ND – 0.00649
[2/]Mercury, Total Recoverable (µg/l)	Monitor	1/quarter	0.00261 – 0.0101
Chemical Oxygen Demand (mg/l)	Monitor	1/quarter	17 – 50

[1/] Daily Minimum
[2/] Mercury results from EPA Method 1631E/1669
ND – Non detect

AM/NS also requests the monitoring requirements allowing representative sampling of outfalls DSN002 and DSN004 for outfall DSN003 are continued, and that sampling requirements for DSN010 allow for representative sampling of outfall DSN009 for DSN010. DSN009, which receives most of the stormwater from the existing marine terminal, will receive the stormwater from the new marine terminal once installation is completed.

Table 4.2 DSN002/003: Discharges from Pond 1 consisting of utility wastewaters including boiler blowdown, non-contact cooling water; ASU non-contact cooling water blowdown, condensate, and cleaning water; RO reject water; and air compressor condensate and non-contact cooling water blowdown; equipment maintenance wastewaters, emergency fire suppression water, dust suppression water, and stormwater water runoff associated with the manufacturing of carbon steel, including transportation equipment activities [2/3/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency
Flow (mgd)	Monitor	Monitor	1/quarter	1/quarter
pH (s.u.)	Monitor [1/]	Monitor	1/quarter	1/quarter
Total Suspended Solids (mg/L)	Monitor	Monitor	1/quarter	1/quarter
Oil and Grease (mg/l)	15	15	1/quarter	1/quarter
Chromium, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Lead, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Nickel, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Zinc, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter

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Table 4.2 DSN002/003: Discharges from Pond 1 consisting of utility wastewaters including boiler blowdown, non-contact cooling water; ASU non-contact cooling water blowdown, condensate, and cleaning water; RO reject water; and air compressor condensate and non-contact cooling water blowdown; equipment maintenance wastewaters, emergency fire suppression water, dust suppression water, and stormwater water runoff associated with the manufacturing of carbon steel, including transportation equipment activities [2/3/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency
Mercury, Total Recoverable (µg/l)	Monitor	Monitor	1/quarter	1/quarter
Chemical Oxygen Demand (mg/l)	Monitor	Monitor	1/quarter	1/quarter

[1/] Daily Minimum
[2/] 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
[3/] Outfalls DSN002 and DSN004 are deemed representative and therefore no sampling is required at DSN003

Table 4.3 DSN004: Discharges from Pond 2 consisting of utility wastewaters including boiler blowdown, non-contact cooling water, compressor condensate; equipment maintenance wastewaters, emergency fire suppression water, dust suppression water, and stormwater water runoff associated with the manufacturing of carbon steel, including transportation equipment activities[2/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency
Flow (mgd)	Monitor	Monitor	1/quarter	1/quarter
pH (s.u.)	Monitor [1/]	Monitor	1/quarter	1/quarter
Total Suspended Solids (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Oil and Grease (mg/L)	15	15	1/quarter	1/quarter
Chromium, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Lead, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Nickel, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Zinc, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Mercury, Total Recoverable (µg/l)	Monitor	Monitor	1/quarter	1/quarter
Chemical Oxygen Demand (mg/l)	Monitor	Monitor	1/quarter	1/quarter

[1/] Daily Minimum

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Table 4.3 DSN004: Discharges from Pond 2 consisting of utility wastewaters including boiler blowdown, non-contact cooling water, compressor condensate; equipment maintenance wastewaters, emergency fire suppression water, dust suppression water, and stormwater water runoff associated with the manufacturing of carbon steel, including transportation equipment activities[2/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency

[2/] 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

Table 4.4 DSN007: Discharges from Pond 4 consisting of stormwater water runoff associated with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water[2/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency
Flow (mgd)	Monitor	Monitor	1/quarter	1/quarter
pH (s.u.)	Monitor [1/]	Monitor	1/quarter	1/quarter
Total Suspended Solids (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Oil and Grease (mg/l)	15	15	1/quarter	1/quarter
Chromium, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Lead, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Nickel, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Zinc, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Mercury, Total Recoverable (µg/l)	Monitor	Monitor	1/quarter	1/quarter
Chemical Oxygen Demand (mg/l)	Monitor	Monitor	1/quarter	1/quarter

[1/] Daily Minimum

[2/] 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

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Table 4.5 DSN009/010: Stormwater runoff associated with the manufacturing of carbon steel, including stormwater runoff from transportation equipment activities, and stormwater runoff from scrap, raw materials, and finished products unloading from the river terminals and tugboat areas, and dust suppression water[2/3/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency
Flow (mgd)	Monitor	Monitor	1/quarter	1/quarter
pH (s.u.)	Monitor [1/]	Monitor	1/quarter	1/quarter
Total Suspended Solids (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Oil and Grease (mg/l)	15	15	1/quarter	1/quarter
Chromium, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Lead, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Nickel, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Zinc, Total (mg/l)	Monitor	Monitor	1/quarter	1/quarter
Mercury, Total Recoverable (µg/l)	Monitor	Monitor	1/quarter	1/quarter
Chemical Oxygen Demand (mg/L)	Monitor	Monitor	1/quarter	1/quarter

[1/] Daily Minimum

[2/] 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

[3/]Outfall DSN009 is deemed representative and therefore no sampling is required at DSN010

Table 4.6 DSN011: Stormwater water runoff associated with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water[2/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency
Flow (mgd)	Monitor	Monitor	1/quarter	Semi-Annual
pH (s.u.)	Monitor [1/]	Monitor	1/quarter	Semi-Annual
Total Suspended Solids (mg/l)	Monitor	Monitor	1/quarter	Semi-Annual
Oil and Grease (mg/l)	15	15	1/quarter	Semi-Annual

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Table 4.6 DSN011: Stormwater water runoff associated with the manufacturing of carbon steel including transportation equipment activities, and dust suppression water[2/]

Parameter (units)	Current Permit Limitations (Daily Maximum)	Requested Permit Limitations (Daily Maximum)	Current Permit Monitoring Frequency	Requested Permit Monitoring Frequency
Chromium, Total (mg/l)	Monitor	Monitor	1/quarter	Semi-Annual
Lead, Total (mg/l)	Monitor	Monitor	1/quarter	Semi-Annual
Nickel, Total (mg/l)	Monitor	Monitor	1/quarter	Semi-Annual
Zinc, Total (mg/l)	Monitor	Monitor	1/quarter	Semi-Annual
Mercury, Total Recoverable (µg/l)	Monitor	Monitor	1/quarter	Semi-Annual
Chemical Oxygen Demand (mg/l)	Monitor	Monitor	1/quarter	Semi-Annual

[1/] Daily Minimum

[2/] 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

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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

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. Permittee Name: AM/NS Calvert LLC
2. NPDES Permit Number: AL 0080233 (not applicable if initial permit application)
3. SID Permit Number (if applicable): IU 41-49-00830
4. NPDES General Permit Number (if applicable): ALG
5. Facility Location (Front Gate): Latitude: 31.152008 Longitude: -87.986710
6. Responsible Official (as described on the last page of this application):

   Name: Phil Fultz Title: Chief Operating Officer

   Address: 1 AM/NS Way

   City: Calvert State: AL Zip: 36513

   Phone Number: 251-289-3000 Email Address: phil.fultz@arcelormittal.com
7. Designated Discharge Monitoring Report (DMR) Contact:

   Name: Olivia Hernaez Title: Mfg.Technology - Environmental

   Phone Number: 251-289-3112 Email Address: olivia.hernaez@arcelormittal.com
8. Type of Business Entity:

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

   ☐ Other (Please Specify)
8. Complete this section if the Applicant's business entity is a Corporation

   a) Location of Incorporation:

   Address: State of Delaware, 2711 Centerville Rd, Suite 400

   City: Wilmington County: New Castle State: DE Zip: 19808

   b) Parent Corporation of Applicant:

   Name: Two Companies: ArcelorMittal Calvert, LLC / NS Kote, Inc

   Address: 1 South Dearborn Street / 1251 6th Avenue, Suite 2320

   City: Chicago / New York State: IL / NY Zip: 60603 / 10020

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c) Subsidiary Corporation(s) of Applicant:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

d) Corporate Officers:

Name: Chuck Greene, Chief Executive Officer

Address: 1 AM/NS Way

City: Calvert State: AL Zip: 36513

Name: Phil Fultz , Chief Operating Officer

Address: 1 AM/NS Way

City: Calvert State: AL Zip: 36513

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

Name: Corporation Service Company ('CSC")

Address: 2711 Centerville Road, Suit 400

City: Wilmington State: DE Zip: 19808

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

Name: _____ Name: _____

Address: _____ Address: _____

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

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

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

11. Identify all Administrative Complaints, Notices of Violation, Directives, Administrative Orders, or Litigation concerning water 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
AM/NS Calvert, LLC	AL0080233	Consent Order 18-043-CWP	March 01, 2018
AM/NS Calvert, LLC	AL0080233	NOV	September 11, 2018

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SECTION B – BUSINESS ACTIVITY

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".

SECTION C – WASTEWATER DISCHARGE INFORMATION

1. Do you share an outfall with another facility? ☒ Yes ☐ No (If no, continue to C.2)

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?
DSN001	Outokumpu Stainless USA, LLC (OTK)	AL0079901	sample collected prior to combination with OTK wastewater

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2. 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:

Outfall DSN001 and TOP 5 (DSNS031), 6 (DSNS041), 9 (DSNS051), 15 DSNS021), and 21 (DSNS011) have flow monitoring equipment and continuous sampling equipment. See ADEM Form 187 Attachment A for a current process flow diagram.

3. 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.4)

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

See ADEM Form 187 Attachment B.

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

Trade Name	Chemical Composition
See ADEM FORM 187 Attachment C	

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
■ Municipal Water Utility (Specify City):
■ Surface Water
☐ Other (Specify): _____

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

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

Surface Intake Volume: 17 MGD* Intake Elevation in Relation to Bottom: -10 Ft.

Intake Elevation: -5 Ft. Latitude: 31 09' 15.014" Longitude: -87 58' 30.150"

Name of Surface Water Source: Tombigbee River

*** MGD – Million Gallons per Day**

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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: Outokumpu Stainless USA,LLC b) Location of Provider: Calvert, AL
   c) Latitude: 31.152008 Longitude: -87.986710
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? 82 %
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? Construction completion - September 2009
   (Please provide dates for all major construction/installation of intake components including screens)
8. What is the maximum intake volume? 21.6 MGD Design Peak Flow
   (maximum pumping capacity in gallons per day)
9. What is the average intake volume? 3.2 MGD (Nov 2019)
   (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)? 4.10 MGD
11. How is the intake operated? (e.g., continuously, intermittently, batch) Continuously
12. What is the mesh size of the screen on your intake? 0.125 inch screen opening
13. What is the intake screen flow-through area? Sweep velocity is 2.28 feet/second
14. What is the through-screen design intake flow velocity? 0.41 ft/sec
15. What is the through-screen actual velocity (in ft/sec)? 0.04 (avg) ft/sec
16. What is the mechanism for cleaning the screen? (e.g., does it rotate for cleaning) Passive wedgewire screens with an air scour system
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.) Source water baseline biological characterization and velocity/biological impingement entrainment monitoring/sampling
19. Attach a site map showing the location of the water intake in relation to the facility, shoreline, water depth, etc.

Documentation for items 3 through 19 are in the ADEM file for OTK NPDES Permit No. AL0079901 (2009 & 2015 permit applications)

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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
Filter Press Sludge	Roll-off container at treatment facility
Spent Pickle Liquor	Tank inside main plant
Nickel Flash Wastewater Treatment Sludge	Hazardous waste storage area

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?	☒	☐
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. SAM-2007-635-DMY		
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.

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

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

Not applicable to this industrial manufacturing facility

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

200 new employees will be needed for the operation of the electric arc furnaces and supporting facilities

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

Not applicable

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

AM/NS Calvert LLC anticipates paying $2,798,495 in state and local taxes associated with the addition of the electric arc furnaces and supporting facilities

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

Not applicable to this industrial manufacturing facility

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

The ability to provide emergency response services to the local community; $290,000 in community investments; $1,999,022,544 in annual employee wages and benefits; $138,176,000 in revenue to locally sourced engineering services and labor during construction of the electric arc furnaces and supporting facilities

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)

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SECTION J– RECEIVING WATERS

Outfall No.	Receiving Water(s)	303(d) Segment?		Included in TMDL?*	
002, 003	Sheppard Lake	☐ Yes	☒ No	☐ Yes	☒ No
004	Unnamed Tributary to Sheppard Lake	☐ Yes	☒ No	☐ Yes	☒ No
007	Borrow Creek	☐ Yes	☒ No	☐ Yes	☒ No
001, 009, 010	Tombigbee River	☒ Yes	☐ No	☐ Yes	☒ No
011	Dabney Creek	☐ 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:_____

Name: Phil Fultz Title: Chief Operating Officer

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.

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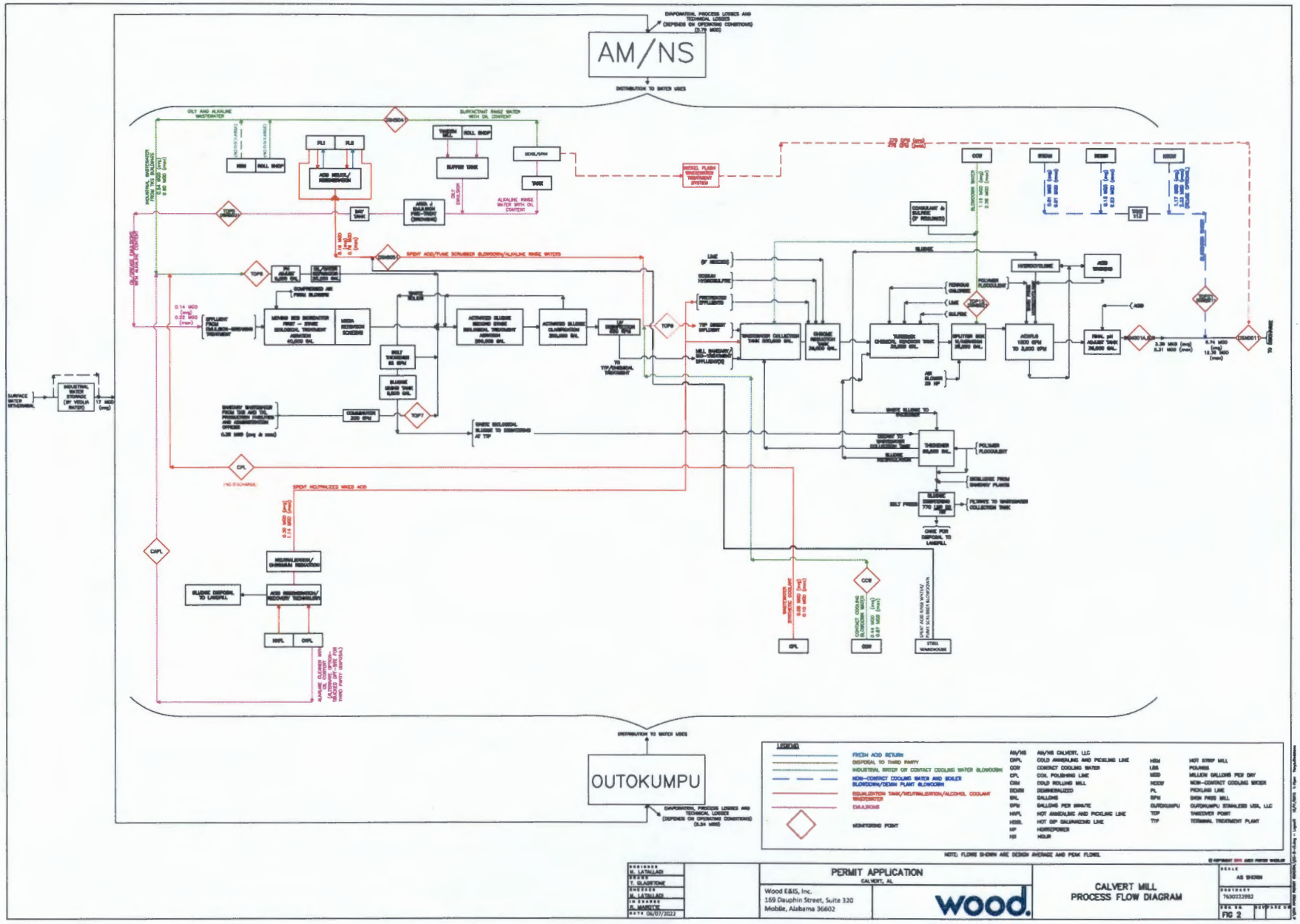
Attachment A. AM/NS Calvert LLC Process Flow Diagram



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Attachment B. AM/NS Calvert, LLC Proposed Facility Modifications

AM/NS is proposing the following facility modifications: Phased construction of two (2) Melt Shops to reduce reliance on third party raw material providers. Each melt shop will consist of:

- One (1) Electric Arc Furnace (EAF)
- One (1) Twin Ladle Metallurgy Furnace (LMF)
- One (1) Continuous Caster

In addition to the Melt Shops, the project will include the addition of a Mold and Segment Shop and installation of auxiliary equipment including one (1) new contact cooling water tower (CWT), and one (1) new non-contact CWT for each Melt Shop construction phase, an air separation unit (ASU), an air compressor complex (ACC), scrap and raw material storage and handling operations, a slab conditioning operation for steel slabs, a new marine terminal for material handling, and slag quench/cooling and sizing operations.

The construction of the Melt Shops is proposed to be conducted in phases. Phase 1 (July 2023 estimated start-up) will include the installation of the first Melt Shop, contact and non- contact CWTs, ASU, ACC, degassing operation, scrap and raw material storage and handling operations, marine terminal, slag management process, and auxiliary equipment. Phase 2 will include the installation of the second Melt Shop and auxiliary equipment with an estimated start-up of July 2024.

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Appendix A: AM/NS Calvert, LLC Water Treatment Additives

Product Name	Product Type	Product Use	Active Component(s)	96-hour LC50	Quantity Used (lbs/yr)[1]	Frequency of Use	CAS Registry Number	Discharge Concentration[2] (lbs/MG)	Location of Use
ChemTreat BL122	Scavenger	Dechlorination and Boiler Water Treatment	Sodium Bisulfite	Fathead Minnow: >1,000 mg/L Sheepshead Minnow: 100 mg/L	34,932	Continuous	7631-90-5	4.88	CAL2 WWTP
ChemTreat BL1283	Scavenger	Cooling Water Treatment	Diethylhydroxylamine	Not determined	12,049	Continuous	3710-84-7	1.68	CCW, Boilers
ChemTreat BL1285	Scavenger	Closed Loop Treatment	Diethylhydroxylamine	Guppies: 1,765 mg/L Fathead Minnow: >10,000 mg/L	Not Used	Not Used	3710-84-7	Not Used	Not Used
ChemTreat BL1302	Alkalinity Adjustment	Boiler Water Treatment	Sodium hydroxide	Bluegill Sunfish: 198 mg/L Mosquito Fish: 250 mg/L	Not Used	Not Used	1310-73-2	Not Used	Not Used
ChemTreat BL1513	CO_2 Neutralizer	Steam Line Treatment	Morpholine Cyclohexylamine	Fathead Minnow: 354 mg/L	Not Used	Not Used	110-91-8 108-91-8	Not Used	Not Used
ChemTreat BL1771	Dispersant	Boiler Water Treatment	Tetrapotassium pyrophosphate	Not determined	Not Used	Not Used	7320-34-5	Not Used	Not Used
ChemTreat BL8681	Dispersant	Boiler Water Treatment	Sodium bisulfite Tetrapotassium pyrophosphate Potassium hydroxide	Fathead Minnow: >1,000 mg/L	Not Used	Not Used	7631-90-5 7320-34-5 1310-58-3	Not Used	Not Used
ChemTreat BL8760	Dispersant	Boiler Water Treatment	Sodium sulfite Sodium phosphate, tribasic Potassium hydroxide	Not determined	27,737	Continuous	7757-83-7 7601-54-9 1310-58-3	3.87	HDGL, Boilers
ChemTreat CD23	Raw Material	Cooling Water Treatment	Sodium hypochlorite	Bluegill Sunfish: 0.6 mg/L Ceriodaphnia Dubia: 1.23 ppm Fathead Minnow: 1.19 ppm	221,383	Continuous	7681-52-9	30.92	CCW
ChemTreat CD24	Raw Material	Cooling Water Treatment	Sulfuric Acid	Bluegill Sunfish: 10.5 ppm	195,497	Continuous	7664-93-9	27.30	CCW
ChemTreat CD30	Biocide	Cooling Water Treatment	Chlorine dioxide	Fathead Minnow: 0.02 mg/L	15,758	Continuous	10049-04-4	2.20	Melt Shops
ChemTreat CD260	Chlorite Scavenger	Dechlorination Treatment	Ferrous Chloride Hydrochloric acid	Fathead Minnow: 718.4 mg/L	88,572	Continuous	7758-94-3 7647-01-0	12.37	CCW
ChemTreat CL16	pH Adjustment	Cooling Water Treatment	Citric Acid 1-Hydroxyethylidene-1,1-diphosphonic acid	Fathead Minnow: >1,000 mg/L Rainbow Trout: 7,906 mg/L	Not Used	Not Used	77-92-9 2809-21-4	Not Used	Not Used
ChemTreat CL25D	Biocide	Cooling Water Microbiocide and Chlorine Dioxide Precursor	Sodium chlorite	Fathead Minnow: 147.4 mg/L Sheepshead Minnow: 105 mg/L	258,976	Continuous	7758-19-2	36.17	CCW
ChemTreat CL41	Biocide	Cooling Water Microbiocide	Sodium bromide	Bluegill Sunfish: > 1,000 mg/L Rainbow Trout: > 1,000 mg/L Fathead Minnow: > 1,000 mg/L Inland Silverside: > 1,000 mg/L	22,648	Continuous	7647-15-6	3.16	HDGL NCCW
ChemTreat CL49	Biocide	Cooling Water Microbiocide	Sodium chlorosulfamate Sodium bromosulfamate Sodium hydroxide	Bluegill Sunfish: 3.8 mg/L Algae: 2.6 mg/L	Not Used	Not Used	17172-27-9 134509-56-1 1310-73-2	Not Used	Not Used
ChemTreat CL206	Biocide	Cooling Water and Reverse Osmosis Disinfectant	2-2-Dibromo-3-nitrilopropionamide	Bluegill Sunfish: 3.8 mg/L Rainbow Trout: 5 mg/L Fathead Minnow: 6.8 mg/L Sheepshead Minnow: 7 mg/L	58	Monthly	10222-01-2	0.01	HDGL NCCW
ChemTreat CL215	Biocide	Cooling Water Microbiocide	5-chloro-2-methyl-4-isothiazolin-3-one 2-methyl-4-isothiazolin-3-one	Bluegill Sunfish: 23 mg/L Rainbow Trout: 16 mg/L	1488	Monthly	26172-55-4 2682-20-4	0.21	HDGL NCCW
ChemTreat CL1441	Inhibitor	Cooling Water Treatment	Tetrapotassium pyrophosphate	Fathead Minnow: 916 mg/L	Not Used	Not Used	7320-34-5	Not Used	Not Used
ChemTreat CL1443	Inhibitor	Cooling Water Treatment	Sodium hexametaphosphate	Fathead Minnow: 1,768 mg/L	354,214	Continuous	10124-56-8	49.47	CCW
ChemTreat CL2032	Biocide	Cooling Water Microbiocide and Algicide	2-(Tert-butylamino)-4-chloro-6-(ethylamino)-s-triazine	Fathead Minnow: 4,364 mg/L (48-hr LC50) Daphnia Pulex: 5,750 mg/L (48-hr LC50)	Not Used	Not Used	5915-41-3	Not Used	Not Used

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Appendix A: AM/NS Calvert, LLC Water Treatment Additives

Product Name	Product Type	Product Use	Active Component(s)	96-hour LC50	Quantity Used (lbs/yr)[1]	Frequency of Use	CAS Registry Number	Discharge Concentration[2] (lbs/MG)	Location of Use
ChemTreat CL2062	Biocide	Cooling Water Microbiocide	Polyethylene Glycol DBNPA 20% Other components below reportable levels	Not determined	360	Continuous	25322-68-3 10222-01-2	0.05	Melt Shops
ChemTreat CL2840D	Inhibitor	Closed System Treatment	Nitrous acid, sodium salt Sodium hydroxide Tolyltriazole, sodium salt	Not determined	5,791	Continuous	7632-00-0 1310-73-2 64665-57-2	0.81	HDGL NCCW
ChemTreat CL2941	Inhibitor	Cooling Water Treatment	Sodium Nitrite Disodium Molybdate Sodium Nitrate Other components below reportable levels	Not determined	12	Continuous	7632-00-0 7631-95-0 7631-99-4	0.0017	Melt Shops
ChemTreat CL3857	Inhibitor	Cooling Water Treatment	2-Phosohono-1,2,4-butane tricarboxylic acid	Fathead Minnow: >1,000 mg/L	Not Used	Not Used	37971-36-1	Not Used	Not Used
ChemTreat CL4075	Cleaner	Cooling water Treatment	1-Hydroxyethylidene-1,1-diphosphonic acid	Rainbow Trout: 300 mg/L Fathead Minnow: 2,267 mg/L	Not Used	Not Used	2809-21-4	Not Used	Not Used
ChemTreat CL4125	Inhibitor	Cooling Water Treatment	Tolyltriazole, sodium salt	Bluegill Sunfish: 173 mg/L Rainbow Trout: 25 mg/L Fathead Minnow: 70-154 mg/L	Not Used	Not Used	64665-57-2	Not Used	Not Used
ChemTreat CL4127	Inhibitor	Cooling Water Treatment	Tolyltriazole, sodium salt Benzotriazole	Fathead Minnow: 198 mg/L	Not Used	Not Used	64665-57-2 95-14-7	Not Used	Not Used
ChemTreat CL4132	Inhibitor	Cooling Water Treatment	Sodium; 4-chloro-5-(4-methylphenyl)-1,2-diaza-3-azanidacyclopenta-1,4-diene Sodium tolyltriazole Sodium hydroxide	Fathead Minnow: 44.1 mg/L	27,519	Continuous	202420-04-0 64665-57-2 1310-73-2	3.84	NCCW
ChemTreat CL4847	Inhibitor	Cooling Water Treatment	2-Phosphono-1,2,4-butanetricarboxylic acid, sodium salt Sodium hydroxide Sodium molybdate Tolyltriazole, sodium salt	Not determined	Not Used	Not Used	40372-66-5 1310-73-2 7631-95-0 64665-57-2	Not Used	Not Used
ChemTreat CL5456	Inhibitor	Cooling Water Treatment Dispersant	2-Phosphono-1,2,4-butane tricarboxylic acid	Fathead Minnow: 6,598 mg/L	Not Used	Not Used	37971-36-1	Not Used	Not Used
ChemTreat CL5678	Inhibitor	Cooling Water Treatment	Sodium hydroxide	Fathead Minnow: >10,000 mg/L Ceriodaphnia dubia: 6,156 mg/L	6,544	Continuous	1310-73-2	0.91	Melt Shops
ChemTreat CL5685	Inhibitor	Cooling Water Treatment	Sodium hydroxide Chlorotolyltriazole sodium salt	Fathead Minnow: 583 mg/L	81,356	Continuous	1310-73-2 202720-04-0	11.36	NCCW
ChemTreat CL5852	Inhibitor	Cooling Water Treatment Dispersant	1-Hydroxyethylidene-1,1-diphosphonic acid, disodium salt Sodium phosphate, monobasic	Ceriodaphnia Dubia: 2,102 mg/L (48-hr LC50) Fathead Minnow: >10,000 mg/L	53,803	Continuous	7414-83-7 7558-80-7	7.51	NCCW
ChemTreat CL6030	Alkalinity Adjustment	Closed System Treatment	Sodium tetraborate pentahydrate Potassium hydroxide	Fathead Minnow: 225 mg/L	Not Used	Not Used	12179-04-3 1310-58-3	Not Used	Not Used
ChemTreat CN220	Degreaser	Cleaner	Silicic acid, disodium salt Ethylene diamine tetraacetic acid, tetrasodium salt 1-Methoxy-2-propanol	Not Determined	Not Used	Not Used	6834-92-0 64-02-8 107-98-2	Not Used	Not Used
ChemTreat CT130	Chlorite Scavenger	Dechlorination Treatment	Sodium thiosulfate	Fathead Minnow: >10,000 mg/L	93,745	Continuous	7772-98-7	13.09	Spray Roaster
ChemTreat DG500	Surfactant	Cleaner	There are no hazardous ingredients in this product as defined in 29 CFR 1910.1200.	Not determined	Not Used	Not Used	Proprietary	Not Used	Not Used

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ADEM Form 187
Appendix A: AM/NS Calvert, LLC Water Treatment Additives

Product Name	Product Type	Product Use	Active Component(s)	96-hour LC50	Quantity Used (lbs/yr)[1]	Frequency of Use	CAS Registry Number	Discharge Concentration[2] (lbs/MG)	Location of Use
ChemTreat F0120	Defoamer	Defoamer	There are no hazardous ingredients in this product as defined in 29 CFR 1910.1200.	Fathead Minnow: 181.841 mg/L	Not Used	Not Used	Proprietary	Not Used	Not Used
ChemTreat P612A	Flocculant	Water Clarification/Solids Conditioning	There are no hazardous ingredients in this product as defined in 29 CFR 1910.1200.	Fathead Minnow: 670 mg/L Bluegill Sunfish: 180 mg/L Rainbow Trout: 130 mg/L	Not Used	Not Used	Proprietary	Not Used	Not Used
ChemTreat P803	Flocculant	Water Clarification/Solids Conditioning	Adipic acid Acrylamide copolymer	Fish: 1 - 10 mg/L	1,657	Continuous	124-04-9 Proprietary	0.23	NCCW
ChemTreat P812A	Flocculant	Water Clarifications/Solids Conditioning	Components not listed are either non hazardous or in concentration of less than 1%	Fathead Minnow: 178.1 mg/L	7,826	Continuous	N/A	1.09	CAL2 WWTP, CCW
ChemTreat P817E	Flocculant	Water Clarification/Solids Conditioning	There are no hazardous ingredients in this product as defined in 29 CFR 1910.1200.	Inland Silverside: 320 mg/L Fathead Minnow: 104 mg/L	50,430	Continuous	N/A	7.04	CCW
ChemTreat P835E	Flocculant	Water Clarification/Solids Conditioning	There are no hazardous ingredients in this product as defined in 29 CFR 1910.1200.	Sheepshead Minnow: 117.5 mg/L Fathead Minnow: 5.815 mg/L	Not Used	Not Used	Proprietary	Not Used	Not Used
ChemTreat P841L	Coagulant	Water Clarification Agent	Tannis, ammonium salts	Fathead Minnow: 183 mg/L Rainbow Trout: 168 mg/L	20,315	Continuous	71631-09-9	2.84	Emulsion Breaking
ChemTreat P873L	Coagulant	Water Clarification Agent	Poly(dimethyldiallylammonium chloride)	Fathead Minnow: 2.253 mg/L Rainbow Trout: 0.6 mg/L	317,781	Continuous	26062-79-3	44.38	CCW
ChemTreat P890L	Coagulant	Water Clarification Agent	Polyaluminum chloride	Fathead Minnow: 230.4 mg/L Sheepshead Minnow: >1,000 mg/L	35,090	Continuous	1327-41-9	4.90	Emulsion Breaking
ChemTreat P893L	Coagulant	Water Clarification Agent	Aluminum chloride hydroxide Other components below reportable levels	Fathead Minnow: 4.218 mg/L	4,432	Continuous	12042-91-0	0.62	Melt Shops
ChemTreat P8141E	Flocculant	Water Clarification/Solids Conditioning	Alcohols (C10-16) ethoxylated Alcohols (C12-16) ethoxylated Alcohols (C12-14-secondary) ethoxylated Alcohols (C12-C14) ethoxylated Petroleum distillate hydrotreated tight	Fathead Minnow: 35.7 mg/L	Not Used	Not Used	68002-97-1 68551-12-2 84133-50-6 68439-50-9 64742-47-8	Not Used	Not Used
ChemTreat RL1700	Cleaner	Reverse Osmosis Membrane Cleaner	Sodium hydroxide Benzene, 1,1-oxybis,tetrapropylene sulfonated sodium salt Citric acid Ethylene diamine tetraacetic acid, tetrasodium salt	Fathead Minnow: 91.9 mg/L	17,467	Batch	1310-73-2 119345-04-9 77-92-9 64-02-8	2.44	RO System
ChemTreat RL2016	Cleaner	Reverse Osmosis and Resin Cleaner	Citric acid 1-hydroxyethylidene-1,1-disphosphonic acid	Fathead Minnow: >1,000 mg/L Rainbow Trout: 7,906 mg/L Sheepshead Minnow: >1,000 mg/L	16,372	Batch	77-92-9 2809-21-4	2.29	RO System
ChemTreat RL9007	Cleaner	Reverse Osmosis Treatment	Diethylenetriamine penta methylene phosphonic acid, sodium salt 2-Phosphono-1,2,4-butane tricarboxylic acid	Fathead Minnow: 2,609 mg/L	18,368	Continuous	22042-96-2 37971-36-1	2.57	RO System
ChemTreat UC1000	Inhibitor	Closed System Treatment	Morpholine Tolyltriazole, sodium salt	Not determined	Not Used	Not Used	110-91-8 64665-57-2	Not Used	Not Used
ChemTreat UC2000	Inhibitor	Closed System Treatment	Diethylhydroxylamine Hydroquinone	Fathead Minnow: 0.732 mg/L Inland Silverside: 1.3 mg/L	Not Used	Not Used	3710-84-7 123-31-9	Not Used	Not Used
ChemTreat UC3001	Alkalinity Adjustment	Scale Control	Potassium Carbonate Other components below reportable levels	Bluegill: 230 mg/L Fathead Minnow: 510 mg/L	18,310	Continuous	584-08-7	2.56	Melt Shops

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Appendix A: AM/NS Calvert, LLC Water Treatment Additives

Product Name	Product Type	Product Use	Active Component(s)	96-hour LC50	Quantity Used (lbs/yr)[1]	Frequency of Use	CAS Registry Number	Discharge Concentration[2] (lbs/MG)	Location of Use
ChemTreat UC3002	Alkalinity Adjustment	Scale Control	Potassium carbonate Other components below reportable levels	Fathead Minnow: 1,895 mg/L	755,415	Continuous	584-08-7	NA	Spray Roaster
ChemTreat UC3003	Alkalinity Adjustment	Scale Control	Potassium Carbonate Other components below reportable levels	Not Available. Toxicity still being evaluated by the manufacturer.	36,054	Continuous	584-08-7	5.04	Melt Shops
ChemTreat UC4000	Inhibitor	Corrosion Inhibitor	Morpholine Chlorotolyltriazole sodium salt Other components below reportable levels	Not determined	5,265	Continuous	110-91-8 202420-04-0	0.74	Melt Shops
Eskaphor K6952	Degreaser	Degreasing Agent	Potassium hydroxide solution	Not Determined	Not Used	Not Used	1310-58-3	Not Used	Not Used
Quadrasperse® CL4B00	Dispersant	Cooling Water Treatment	Thera are no hazardous ingredients in this product as defined in 29 CFR 1910.1200.	Fathead Minnow: >1,000 mg/L Inland Silverside: >10,000 mg/L	Not Used	Not Used	Proprietary	Not Used	Not Used
Suez GENGARD GN8144	Inhibitor	Corrosion Inhibitor	Chlorotolyltriazole sodium salt Sodium Hydroxide	Fathead Minnow: 185 mg/L Mysid Shrimp: 462.7 mg/L	13,107	Continuous	202420-04-0 1310-73-2	1.83	ASU
Suez GENGARD GN8301	Inhibitor	Corrosion Inhibitor	Phosphoric Acid, tripotassium salt Sodium Hydroxide	Fathead Minnow: 1,640 mg/L	33,690	Continuous	7778-53-2	4.71	ASU

Acronyms:
ASU - Air Separation Unit
BD -Blowdown
CAS - Chemical Abstract Service
CCW - Contact Cooling Water
CFR - Code of Federal Regulations
CO_2 - Carbon Dioxide
lbs/MG - Pounds Per Million Gallons
lbs/yr - Pounds Per Year
LC50 - The effluent concentration which is lethal to 50 percent of the test organisms in the time period prescribed by the test
mg/L - Milligrams Per Liter
N/A - Not Applicable
N/D - Not Determined
NCCW - Non-Contact Cooling Water
ppm - Parts Per Million
Outokumpu - Outokumpu Stainless USA, LLC
WWTP - Wastewater Treatment Plant

Notes:
1. Quantity used during 2021 and estimated for the new processes associated with operations of the electric arc furnaces and supporting facilites.
2. These components are not routinely tested. Concentration shown assumes components are not degraded or otherwise transformed by the various treatment units before discharge.

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Attachment 1 to Supplementary Form
ADEM Form 311

Alternatives Analysis

Applicant/Project: AM/NS Calvert LLC - DSN002 & DSN003

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of ADEM's antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate " . . . that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, including a calculation of the total annualized project costs for each technically feasible alternative (using ADEM Form 312 for public-sector projects and ADEM Form 313 for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1 Land Application		x	Land application not technically feasible; see attachment
2 Pretreatment/Discharge to POTW		x	Introduction of stormwater to POTW is prohibited, see attachment
3 Relocation of Discharge		x	Relocation of Discharge is not technically feasible; see attachment
4 Reuse/Recycle		x	Complete recycle is not technically feasible; see attachment.
5 Process/Treatment Alternatives		x	Not applicable for stormwater and nonprocess water; see attachment
6 On-site/Sub-surface Disposal		x	This alternative is not technically feasible; see attachment
(other project-specific alternatives considered by the applicant; attach additional sheets if necessary)			
7 NPDES Discharge to Sheppard Lake	x		Most viable option for this nonprocess water and stormwater; see attachment
8			
9			

Pursuant to ADEM Administrative Code Rule 335-6-3-.04, I certify on behalf of the applicant that I have completed an evaluation of the discharge alternatives identified above, and reached the conclusions indicated.

Signature: _____ *(Professional Engineer)*

Date: 09/20/2022

ALABAMA LICENSED No. 24947 PROFESSIONAL ENGINEER MICHAEL C. STICKLEY

(Supporting documentation to be attached, referenced, or otherwise handled as appropriate.)

ADEM Form 311 3/02

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1. ALTERNATIVE ANALYSIS

Applicant/Project: AM/NS Calvert LLC - DSN002 & DSN003

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of the antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate " . . . that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, to include calculation of total annualized project costs for each technically feasible alternative using the attached worksheets (Worksheet B for public-sector projects and Worksheet R for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1. Land Application		X	Land application technically is not feasible because a large percentage of the water that would require disposal is stormwater, and its volume would require an extremely large application site. It would not be possible to land apply during and after storm events. Therefore, runoff from the site would have to be collected, pumped, and then stored in holding basins or tanks until the land application area soil was dry enough to accept additional water. The storage facility would have to be designed to retain the volume of a recurrent interval design storm, because sizing it for all possible events would not be feasible. Should a rain event occur that was larger than the design event, or if numerous small events should occur that would keep the ground saturated and prevent the application of the stored water, then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state. In addition to the storage issues, the land acreage required for the application of even a small rain event would be extremely large. General planning guidelines for the land application of wastewater recommend between 50 and 550 acres of land per million gallons of water. The uppermost stratum at the Calvert Mill site contains a 15- to 20-foot layer of low and high plasticity, and stiff clays, along with non-elastic silts and firm sand based upon a review of data in a Waste Management Report dated November 25, 2008 (prepared by MACTEC Engineering and Consulting, Inc). This type of soil strata would severely restrict infiltration and probably result in an area requirement in the upper guideline range. To land apply approximately 9 million gallons of total volume, between 450 and 4,950 acres would be required. Therefore, because this is stormwater and an extremely large area would be required for land disposal, this alternative technically is not feasible.
2. Pretreatment/Discharge to POTW		X	Introduction of storm water to a POTW is prohibited under local ordinances; therefore, this is not technically feasible.
3. Relocation of Discharge		X	Alternate discharge locations would include discharging of the flow directly into the Tombigbee River or to the next larger water body which is the Mobile Bay which is approximately 15 miles from the site. To convey this nonprocess wastewater and stormwater flows to either of these discharge locations is considered not technically feasible. This would require the construction of several large pump stations due to the general site layout, a peak flow storage facility, and a transmission

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			main from the pump stations river or bay. Similar to the issues associated with land application, the system would have to be large enough to store and/or convey a design frequency rain event. When a rain event occurs that exceeded the design event, the hydraulic capacity of the system would be exceeded, resulting in an uncontrolled and unpermitted discharge. Construction cost would be prohibitively expensive, would require acquisition of property and would impact numerous wetlands that would have to be crossed for the construction of the force mains.
4. Reuse / Recycle		X	Nonprocess wastewater is reused and recycled to the maximum extent possible. Complete recycle/reuse is not technically feasible.
5. Process/Treatment Alternatives		X	This alternative is not applicable as this is stormwater and nonprocess wastewater.
6. On Site/Subsurface, combination of above or other disposal alternatives.		X	This alternative is not considered to be technically feasible. Injection of the water would require construction of a pump station and drilling several large, high-capacity wells. In addition, an online monitoring system and potentially a membrane or other type of water treatment system would be required to achieve the injection limits. The concentrations of dissolved solids in the sand and gravel aquifer (shallow groundwater) are less than 50 milligrams per liter (mg/L). Deep groundwater sampling indicates that concentrations of dissolved solids are less than 2,500 mg/L. Therefore, the groundwater quality at the site is suitable for drinking water as defined by ADEM Admin. Code R. 335-6-8-.03. Depending on the quality of the nonprocess wastewater and stormwater, treatment might be required before it could be injected to ensure that the water would not degrade the underlying groundwater resources. In addition to achieving the injection limits, the storage, treatment and pumping system would have to be designed to retain, treat and inject the volume of a recurrent interval design recurrent interval design storm, because of sizing it for all possible events would not be feasible. Should a rain event occur that was longer than the design event then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state.
7. NPDES Discharge to Sheppard Lake	X		This is the most viable alternative available for this nonprocess wastewater and stormwater flow. With continued proper monitoring of the outfalls, source discharge control and proper installation and monitoring of Best Management Practices, water quality in the receiving stream will continue to be protected.
Note: Discharge from DSN002/DSN003 may include the following: utility wastewaters including boiler blowdown; non-contact cooling water blowdown; discharge from the ASU; RO reject water; air compressor condensate and non-contact cooling water blowdown; equipment maintenance wastewaters; emergency fire suppression water; dust suppression water; and stormwater runoff associated with the manufacturing of carbon steel, including transportation equipment activities.			

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AM/NS Calvert LLC - DSN002 & DSN003

Calculation of Total Annualized Project Costs for Private-Sector Projects

Capital Costs to be Financed (Supplied by applicant)	$ 14,600	(1)
Interest rate for Financing (Expressed as a decimal)	n/a	(i)
Time Period of Financing (Assume 10 years*)	10 years	(n)
Annualization Factor = $\frac{i}{(1+i)^{10} - 1} + i$	n/a	(2)
Annualized Capital Cost [Calculate: (1) x (2)]	$ n/a	(3)
Annual Cost of Operation and Maintenance (including but not limited to monitoring, inspection, permitting fees, waste disposal charges, repair, administration and replacement)**	$ 5,000	(4)
Total Annual Cost of Pollution Control Project [(3) + (4)]	$ 19,600	(5)

* While actual payback schedules may differ across projects and companies, assume equal annual payments over a 10-year period for consistency in comparing projects.

** For recurring costs that occur less frequently than once a year, pro rate the cost over the relevant number of years (e.g., for pumps replaced once every three years, include one-third of the cost in each year).

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Attachment 1 to Supplementary Form
ADEM Form 311

Alternatives Analysis

Applicant/Project: AM/NS Calvert LLC - DSN004

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of ADEM's antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate " . . . that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, including a calculation of the total annualized project costs for each technically feasible alternative (using ADEM Form 312 for public-sector projects and ADEM Form 313 for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1 Land Application		x	Land application not technically feasible; see attachment
2 Pretreatment/Discharge to POTW		x	Introduction of stormwater to POTW is prohibited, see attachment
3 Relocation of Discharge		x	Relocation of Discharge is not technically feasible; see attachment
4 Reuse/Recycle		x	Complete recycle is not technically feasible; see attachment.
5 Process/Treatment Alternatives		x	Not applicable for stormwater and nonprocess water; see attachment
6 On-site/Sub-surface Disposal		x	This alternative is not technically feasible; see attachment
(other project-specific alternatives considered by the applicant; attach additional sheets if necessary)			
7 NPDES Discharge to Unnamed Tributary to Sheppard Lake	x		Most viable option for this nonprocess water and stormwater; see attachment
8			
9			

Pursuant to ADEM Administrative Code Rule 335-6-3-.04, I certify on behalf of the applicant that I have completed an evaluation of the discharge alternatives identified above, and reached the conclusions indicated.

Signature: _____ *(Professional Engineer)*

Date: 09/20/2022

ALABAMA LICENSED No. 24947 PROFESSIONAL ENGINEER MICHAEL C. STANLEY

(Supporting documentation to be attached, referenced, or otherwise handled as appropriate.)

ADEM Form 311 3/02

1. ALTERNATIVE ANALYSIS

Applicant/Project: AM/NS Calvert LLC - DSN004

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of the antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate "... that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, to include calculation of total annualized project costs for each technically feasible alternative using the attached worksheets (Worksheet B for public-sector projects and Worksheet R for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1. Land Application		X	Land application technically is not feasible because a large percentage of the water that would require disposal is stormwater, and its volume would require an extremely large application site. It would not be possible to land apply during and after storm events. Therefore, runoff from the site would have to be collected, pumped, and then stored in holding basins or tanks until the land application area soil was dry enough to accept additional water. The storage facility would have to be designed to retain the volume of a recurrent interval design storm, because sizing it for all possible events would not be feasible. Should a rain event occur that was larger than the design event, or if numerous small events should occur that would keep the ground saturated and prevent the application of the stored water, then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state. In addition to the storage issues, the land acreage required for the application of even a small rain event would be extremely large. General planning guidelines for the land application of wastewater recommend between 50 and 550 acres of land per million gallons of water. The uppermost stratum at the Calvert Mill site contains a 15- to 20-foot layer of low and high plasticity, and stiff clays, along with non-elastic silts and firm sand based upon a review of data in a Waste Management Report dated November 25, 2008 (prepared by MACTEC Engineering and Consulting, Inc). This type of soil strata would severely restrict infiltration and probably result in an area requirement in the upper guideline range. To land apply approximately 9 million gallons of total volume, between 450 and 4,950 acres would be required. Therefore, because this is stormwater and an extremely large area would be required for land disposal, this alternative technically is not feasible.
2. Pretreatment/Discharge to POTW		X	Introduction of storm water to a POTW is prohibited under local ordinances; therefore, this is not technically feasible.
3. Relocation of Discharge		X	Alternate discharge locations would include discharging of the flow directly into the Tombigbee River or to the next larger water body which is the Mobile Bay which is approximately 15 miles from the site. To convey this nonprocess wastewater and stormwater flows to either of these discharge locations is considered not technically feasible. This would require the construction of several large pump stations due to the general site layout, a peak flow storage facility, and a transmission

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			main from the pump stations river or bay. Similar to the issues associated with land application, the system would have to be large enough to store and/or convey a design frequency rain event. When a rain event occurs that exceeded the design event, the hydraulic capacity of the system would be exceeded, resulting in an uncontrolled and unpermitted discharge. Construction cost would be prohibitively expensive, would require acquisition of property and would impact numerous wetlands that would have to be crossed for the construction of the force mains.
4. Reuse / Recycle		X	Nonprocess wastewater is reused and recycled to the maximum extent possible. Complete recycle/reuse is not technically feasible.
5. Process/Treatment Alternatives		X	This alternative is not applicable as this is storm water and nonprocess wastewater.
6. On Site/Subsurface, combination of above or other disposal alternatives.		X	This alternative is not considered to be technically feasible. Injection of the water would require construction of a pump station and drilling several large, high-capacity wells. In addition, an online monitoring system and potentially a membrane or other type of water treatment system would be required to achieve the injection limits. The concentrations of dissolved solids in the sand and gravel aquifer (shallow groundwater) are less than 50 milligrams per liter (mg/L). Deep groundwater sampling indicates that concentrations of dissolved solids are less than 2,500 mg/L. Therefore, the groundwater quality at the site is suitable for drinking water as defined by ADEM Admin. Code R. 335-6-8-.03. Depending on the quality of the nonprocess wastewater and stormwater, treatment might be required before it could be injected to ensure that the water would not degrade the underlying groundwater resources. In addition to achieving the injection limits, the storage, treatment and pumping system would have to be designed to retain, treat and inject the volume of a recurrent interval design recurrent interval design storm, because of sizing it for all possible events would not be feasible. Should a rain event occur that was longer than the design event then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state.
7. NPDES Discharge to Unnamed Tributary to Sheppard Lake	X		This is the most viable alternative available for this nonprocess wastewater and stormwater flow. With continued proper monitoring of the outfalls, source discharge control and proper installation and monitoring of Best Management Practices, water quality in the receiving stream will continue to be protected.
Note: Discharge from DSN004 may include the following: utility wastewaters including boiler blowdown; non-contact cooling water blowdown; air compressor condensate; equipment maintenance wastewaters; emergency fire suppression water; dust suppression water; and stormwater runoff associated with the manufacturing of carbon steel, including transportation equipment activities.			

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AM/NS Calvert LLC - DSN004

Calculation of Total Annualized Project Costs for Private-Sector Projects

Capital Costs to be Financed (Supplied by applicant)	$ 14,600	(1)
Interest rate for Financing (Expressed as a decimal)	n/a	(i)
Time Period of Financing (Assume 10 years*)	10 years	(n)
Annualization Factor $= \frac{i}{(1+i)^{10} - 1} + i$	n/a	(2)
Annualized Capital Cost [Calculate: (1) x (2)]	$ n/a	(3)
Annual Cost of Operation and Maintenance (including but not limited to monitoring, inspection, permitting fees, waste disposal charges, repair, administration and replacement)**	$ 5,000	(4)
Total Annual Cost of Pollution Control Project [(3) + (4)]	$ 19,600	(5)

* While actual payback schedules may differ across projects and companies, assume equal annual payments over a 10-year period for consistency in comparing projects.

** For recurring costs that occur less frequently than once a year, pro rate the cost over the relevant number of years (e.g., for pumps replaced once every three years, include one-third of the cost in each year).

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Attachment 1 to Supplementary Form
ADEM Form 311

Alternatives Analysis

Applicant/Project: AM/NS Calvert LLC - DSN007

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of ADEM's antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate " . . . that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, including a calculation of the total annualized project costs for each technically feasible alternative (using ADEM Form 312 for public-sector projects and ADEM Form 313 for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1 Land Application		x	Land application not technically feasible; see attachment
2 Pretreatment/Discharge to POTW		x	Introduction of stormwater to POTW is prohibited, see attachment
3 Relocation of Discharge		x	Relocation of Discharge is not technically feasible; see attachment
4 Reuse/Recycle		x	Not applicable for stormwater; see attachment.
5 Process/Treatment Alternatives		x	Not applicable for stormwater; see attachment
6 On-site/Sub-surface Disposal		x	This alternative is not technically feasible; see attachment
(other project-specific alternatives considered by the applicant; attach additional sheets if necessary)			
7 NPDES Discharge to Barrow Creek	x		Most viable option for this nonprocess water and stormwater; see attachment
8			
9			

Pursuant to ADEM Administrative Code Rule 335-6-3-.04, I certify on behalf of the applicant that I have completed an evaluation of the discharge alternatives identified above, and reached the conclusions indicated.

Signature: _____ *(Professional Engineer)*

Date: 09/29/2022

ALABAMA LICENSED No. 24947 PROFESSIONAL ENGINEER MICHAEL C. STICKLEY

(Supporting documentation to be attached, referenced, or otherwise handled as appropriate)

ADEM Form 311 3/02

ADEM Watermark

1. ALTERNATIVE ANALYSIS

Applicant/Project: AM/NS Calvert LLC - DSN007

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of the antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate " . . . that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, to include calculation of total annualized project costs for each technically feasible alternative using the attached worksheets (Worksheet B for public-sector projects and Worksheet R for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1. Land Application		X	Land application technically is not feasible because a large percentage of the water that would require disposal is stormwater, and its volume would require an extremely large application site. It would not be possible to land apply during and after storm events. Therefore, runoff from the site would have to be collected, pumped, and then stored in holding basins or tanks until the land application area soil was dry enough to accept additional water. The storage facility would have to be designed to retain the volume of a recurrent interval design storm, because sizing it for all possible events would not be feasible. Should a rain event occur that was larger than the design event, or if numerous small events should occur that would keep the ground saturated and prevent the application of the stored water, then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state. In addition to the storage issues, the land acreage required for the application of even a small rain event would be extremely large. General planning guidelines for the land application of wastewater recommend between 50 and 550 acres of land per million gallons of water. The uppermost stratum at the Calvert Mill site contains a 15- to 20-foot layer of low and high plasticity, and stiff clays, along with non-elastic silts and firm sand based upon a review of data in a Waste Management Report dated November 25, 2008 (prepared by MACTEC Engineering and Consulting, Inc). This type of soil strata would severely restrict infiltration and probably result in an area requirement in the upper guideline range. To land apply approximately 9 million gallons of total volume, between 450 and 4,950 acres would be required. Therefore, because this is stormwater and an extremely large area would be required for land disposal, this alternative technically is not feasible.
2. Pretreatment/Discharge to POTW		X	Introduction of storm water to a POTW is prohibited under local ordinances; therefore, this is not technically feasible.
3. Relocation of Discharge		X	Alternate discharge locations would include discharging of the flow directly into the Tombigbee River or to the next larger water body which is the Mobile Bay which is approximately 15 miles from the site. To convey this nonprocess wastewater and stormwater flows to either of these discharge locations is considered not technically feasible. This would require the construction of several large pump stations due to the general site layout, a peak flow storage facility, and a transmission

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			main from the pump stations river or bay. Similar to the issues associated with land application, the system would have to be large enough to store and/or convey a design frequency rain event. When a rain event occurs that exceeded the design event, the hydraulic capacity of the system would be exceeded, resulting in an uncontrolled and unpermitted discharge. Construction cost would be prohibitively expensive, would require acquisition of property and would impact numerous wetlands that would have to be crossed for the construction of the force mains.
4. Reuse / Recycle		X	Nonprocess wastewater is reused and recycled to the maximum extent possible. Complete recycle/reuse is not technically feasible.
5. Process/Treatment Alternatives		X	This alternative is not applicable as this is storm water.
6. On Site/Subsurface, combination of above or other disposal alternatives.		X	This alternative is not considered to be technically feasible. Injection of the water would require construction of a pump station and drilling several large, high-capacity wells. In addition, an online monitoring system and potentially a membrane or other type of water treatment system would be required to achieve the injection limits. The concentrations of dissolved solids in the sand and gravel aquifer (shallow groundwater) are less than 50 milligrams per liter (mg/L). Deep groundwater sampling indicates that concentrations of dissolved solids are less than 2,500 mg/L. Therefore, the groundwater quality at the site is suitable for drinking water as defined by ADEM Admin. Code R. 335-6-8-.03. Depending on the quality of the nonprocess wastewater and stormwater, treatment might be required before it could be injected to ensure that the water would not degrade the underlying groundwater resources. In addition to achieving the injection limits, the storage, treatment and pumping system would have to be designed to retain, treat and inject the volume of a recurrent interval design recurrent interval design storm, because of sizing it for all possible events would not be feasible. Should a rain event occur that was longer than the design event then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state.
7. NPDES Discharge to Barrow Creek	X		This is the most viable alternative available for this stormwater flow. With continued proper monitoring of the outfalls, source discharge control and proper installation and monitoring of Best Management Practices, water quality in the receiving stream will continue to be protected.
Note: Discharge from DSN007may include the following: stormwater runoff associated with the manufacturing of carbon steel, including transportation equipment activities; dust suppression water.			

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AM/NS Calvert LLC - DSN007

Calculation of Total Annualized Project Costs
for Private-Sector Projects

Capital Costs to be Financed (Supplied by applicant)	$ 14,600	(1)
Interest rate for Financing (Expressed as a decimal)	n/a	(i)
Time Period of Financing (Assume 10 years*)	10 years	(n)
Annualization Factor = $\frac{i}{(1+i)^{10} - 1} + i$	n/a	(2)
Annualized Capital Cost [Calculate: (1) x (2)]	$ n/a	(3)
Annual Cost of Operation and Maintenance (including but not limited to monitoring, inspection, permitting fees, waste disposal charges, repair, administration and replacement)**	$ 5,000	(4)
Total Annual Cost of Pollution Control Project [(3) + (4)]	$ 19,600	(5)

* While actual payback schedules may differ across projects and companies, assume equal annual payments over a 10-year period for consistency in comparing projects.

** For recurring costs that occur less frequently than once a year, pro rate the cost over the relevant number of years (e.g., for pumps replaced once every three years, include one-third of the cost in each year).

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Attachment 1 to Supplementary Form
ADEM Form 311

Alternatives Analysis

Applicant/Project: AM/NS Calvert LLC - DSN011

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of ADEM's antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate " . . . that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, including a calculation of the total annualized project costs for each technically feasible alternative (using ADEM Form 312 for public-sector projects and ADEM Form 313 for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1 Land Application		x	Land application not technically feasible; see attachment
2 Pretreatment/Discharge to POTW		x	Introduction of stormwater to POTW is prohibited, see attachment
3 Relocation of Discharge		x	Relocation of Discharge is not technically feasible; see attachment
4 Reuse/Recycle		x	Not applicable for stormwater; see attachment
5 Process/Treatment Alternatives		x	Not applicable for stormwater; see attachment
6 On-site/Sub-surface Disposal		x	This alternative is not technically feasible; see attachment
(other project-specific alternatives considered by the applicant; attach additional sheets if necessary)			
7 NPDES Discharge to Dabney Creek	x		Most viable option for this stormwater; see attachment
8			
9			

Pursuant to ADEM Administrative Code Rule 335-6-3-.04, I certify on behalf of the applicant that I have completed an evaluation of the discharge alternatives identified above, and reached the conclusions indicated.

Signature: _____ *(Professional Engineer)*

Date: 05/20/2022

ALABAMA LICENSED No. 24947 PROFESSIONAL ENGINEER MICHAEL C. STICKLEY

(Supporting documentation to be attached, referenced, or otherwise handled as appropriate)

ADEM Form 311 3/02

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1. ALTERNATIVE ANALYSIS

Applicant/Project: AM/NS Calvert LLC - DSN0011

All new or expanded discharges (except discharges eligible for coverage under general permits) covered by the NPDES permitting program are subject to the provisions of the antidegradation policy. Applicants for such discharges to Tier 2 waters are required to demonstrate "... that the proposed discharge is necessary for important economic or social development." As a part of this demonstration, the applicant must complete an evaluation of the discharge alternatives listed below, to include calculation of total annualized project costs for each technically feasible alternative using the attached worksheets (Worksheet B for public-sector projects and Worksheet R for private-sector projects). Alternatives with total annualized project costs that are less than 110% of the total annualized project costs for the Tier 2 discharge proposal are considered viable alternatives.

Alternative	Viable	Non-Viable	Comment
1. Land Application		X	Land application technically is not feasible because a large percentage of the water that would require disposal is stormwater, and its volume would require an extremely large application site. It would not be possible to land apply during and after storm events. Therefore, runoff from the site would have to be collected, pumped, and then stored in holding basins or tanks until the land application area soil was dry enough to accept additional water. The storage facility would have to be designed to retain the volume of a recurrent interval design storm, because sizing it for all possible events would not be feasible. Should a rain event occur that was larger than the design event, or if numerous small events should occur that would keep the ground saturated and prevent the application of the stored water, then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state. In addition to the storage issues, the land acreage required for the application of even a small rain event would be extremely large. General planning guidelines for the land application of wastewater recommend between 50 and 550 acres of land per million gallons of water. The uppermost stratum at the Calvert Mill site contains a 15- to 20-foot layer of low and high plasticity, and stiff clays, along with non-elastic silts and firm sand based upon a review of data in a Waste Management Report dated November 25, 2008 (prepared by MACTEC Engineering and Consulting, Inc). This type of soil strata would severely restrict infiltration and probably result in an area requirement in the upper guideline range. To land apply approximately 9 million gallons of total volume, between 450 and 4,950 acres would be required. Therefore, because this is stormwater and an extremely large area would be required for land disposal, this alternative technically is not feasible.
2. Pretreatment/Discharge to POTW		X	Introduction of storm water to a POTW is prohibited under local ordinances; therefore, this is not technically feasible.
3. Relocation of Discharge		X	Alternate discharge locations would include discharging of the flow directly into the Tombigbee River or to the next larger water body which is the Mobile Bay which is approximately 15 miles from the site. To convey this nonprocess wastewater and stormwater flows to either of these discharge locations is considered not technically feasible. This would require the construction of several large pump stations due to the general site layout, a peak flow storage facility, and a transmission

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			main from the pump stations river or bay. Similar to the issues associated with land application, the system would have to be large enough to store and/or convey a design frequency rain event. When a rain event occurs that exceeded the design event, the hydraulic capacity of the system would be exceeded, resulting in an uncontrolled and unpermitted discharge. Construction cost would be prohibitively expensive, would require acquisition of property and would impact numerous wetlands that would have to be crossed for the construction of the force mains.
4. Reuse / Recycle		X	Nonprocess wastewater is reused and recycled to the maximum extent possible. Complete recycle/reuse is not technically feasible.
5. Process/Treatment Alternatives		X	This alternative is not applicable as this is storm water.
6. On Site/Subsurface, combination of above or other disposal alternatives.		X	This alternative is not considered to be technically feasible. Injection of the water would require construction of a pump station and drilling several large, high-capacity wells. In addition, an online monitoring system and potentially a membrane or other type of water treatment system would be required to achieve the injection limits. The concentrations of dissolved solids in the sand and gravel aquifer (shallow groundwater) are less than 50 milligrams per liter (mg/L). Deep groundwater sampling indicates that concentrations of dissolved solids are less than 2,500 mg/L. Therefore, the groundwater quality at the site is suitable for drinking water as defined by ADEM Admin. Code R. 335-6-8-.03. Depending on the quality of the nonprocess wastewater and stormwater, treatment might be required before it could be injected to ensure that the water would not degrade the underlying groundwater resources. In addition to achieving the injection limits, the storage, treatment and pumping system would have to be designed to retain, treat and inject the volume of a recurrent interval design recurrent interval design storm, because of sizing it for all possible events would not be feasible. Should a rain event occur that was longer than the design event then the storage facility would overflow. Such a storage facility overflow would result in an uncontrolled and unpermitted discharge to waters of the state.
7. NPDES Discharge to Dabney Creek	X		This is the most viable alternative available for this stormwater flow. With continued proper monitoring of the outfalls, source discharge control and proper installation and monitoring of Best Management Practices, water quality in the receiving stream will continue to be protected.
Note: Discharge from DSN011 may include the following: stormwater runoff associated with the manufacturing of carbon steel, including transportation equipment activities; dust suppression water.			

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AM/NS Calvert LLC - DSN011

Calculation of Total Annualized Project Costs for Private-Sector Projects

Capital Costs to be Financed (Supplied by applicant)	$ 14,600	(1)
Interest rate for Financing (Expressed as a decimal)	n/a	(i)
Time Period of Financing (Assume 10 years*)	10 years	(n)
Annualization Factor = $\frac{i}{(1+i)^{10} - 1} + i$	n/a	(2)
Annualized Capital Cost [Calculate: (1) x (2)]	$ n/a	(3)
Annual Cost of Operation and Maintenance (including but not limited to monitoring, inspection, permitting fees, waste disposal charges, repair, administration and replacement)**	$ 5,000	(4)
Total Annual Cost of Pollution Control Project [(3) + (4)]	$ 19,600	(5)

* While actual payback schedules may differ across projects and companies, assume equal annual payments over a 10-year period for consistency in comparing projects.

** For recurring costs that occur less frequently than once a year, pro rate the cost over the relevant number of years (e.g., for pumps replaced once every three years, include one-third of the cost in each year).

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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110039169333	AL0080233	AM/NS Calvert LLC	

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

AM/NS Calvert LLC

2.2 EPA Identification Number

110039169333

2.3 Facility Contact

Name (first and last)	Title	Phone number
Robert Pinkard	Area Manager - Manufacturing Technology	(251) 289-3316

Email address
robert.pinkard@arcelormittal.com

2.4 Facility Mailing Address

Street or P.O. box
PO Box 456

City or town	State	ZIP code
Calvert	AL	36513

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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110039169333	AL0080233	AM/NS Calvert LLC	

Name, Mailing Address, and Location Continued

2.5 **Facility Location**

Street, route number, or other specific identifier
1 AM/NS Way

County name	County code (if known)	
Mobile	01097	
City or town	**State**	**ZIP code**
Calvert	AL	36513

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

SIC and NAICS Codes

3.1

SIC Code(s)	Description (optional)
3312	Steel Works, Blast Furnaces (including Coke Ovens), and Rolling Mills
3471	Electroplating, Plating, Polishing, Anodizing, and Coloring

3.2

NAICS Code(s)	Description (optional)
331110	Iron and Steel Mills and Ferroalloy Manufacturing
331221	Rolled Steel Shape Manufacturing
332813	Electroplating, Plating, Polishing, Anodizing, and Coloring

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

Operator Information

4.1 **Name of Operator**

AM/NS Calvert LLC

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) 289-3000

Operator Information Continued

4.5 **Operator Address**

Street or P.O. Box
1 AM/NS Way

City or town	State	ZIP code
Calvert	AL	36513

Email address of operator
phil.fultz @arcelormittal.com

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

Indian Land

5.1 Is the facility located on Indian Land?

☐ Yes ☑ No

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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110039169333	AL0080233	AM/NS Calvert LLC	

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) AL0080233	☑ RCRA (hazardous wastes) ALR000042689	☐ UIC (underground injection of fluids)
☑ PSD (air emissions) Title V Major 503-0095	☐ Nonattainment program (CAA)	☐ NESHAPs (CAA)
☐ Ocean dumping (MPRSA)	☑ Dredge or fill (CWA Section 404) SAM-2007-635-DMY	☑ Other (specify) SID IU 41-49-00830

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.

The carbon steel mill owned and operated by AM/NS Calvert LLC produces an array of steel products using three steel mill processes: Hot Strip Mill (HSM), Cold Rolling Mill (CRM), and Hot Dip/Galvanizing (HDG) Mill. Carbon steel slabs are received via barge, truck, and rail and processed based on customers' needs. The initial processing of the steel slabs begins in the HSM. The HSM reheats the carbon steel slabs to produce carbon steel coils that can be sold into commerce or further processed in the CRM. The CRM is an ambient temperature process that strengthens the steel coils while improving the aesthetics of the finished surface. These steel coils can be sold into commerce or further processed in the HDG Mill. In the HDG Mill, the steel coils are sent through the galvanizing, annealing, or skin-rolling processes based on the customers' requirements prior to being shipped offsite.

The AM/NS Calvert LLC facility is in the process of adding two new electric arc furnaces and supporting equipment to manufacture steel slabs on-site from recycled materials.

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.)

The source of the cooling water is an intake station located in the Tombigbee River that is owned and operated by Outokumpu Stainless USA, LLC.

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	

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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110039169333	AL0080233	AM/NS Calvert LLC	

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 EPA Form 1 Attachment A
☑ 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
Phil Fultz	Chief Operating Officer
Signature	Date signed

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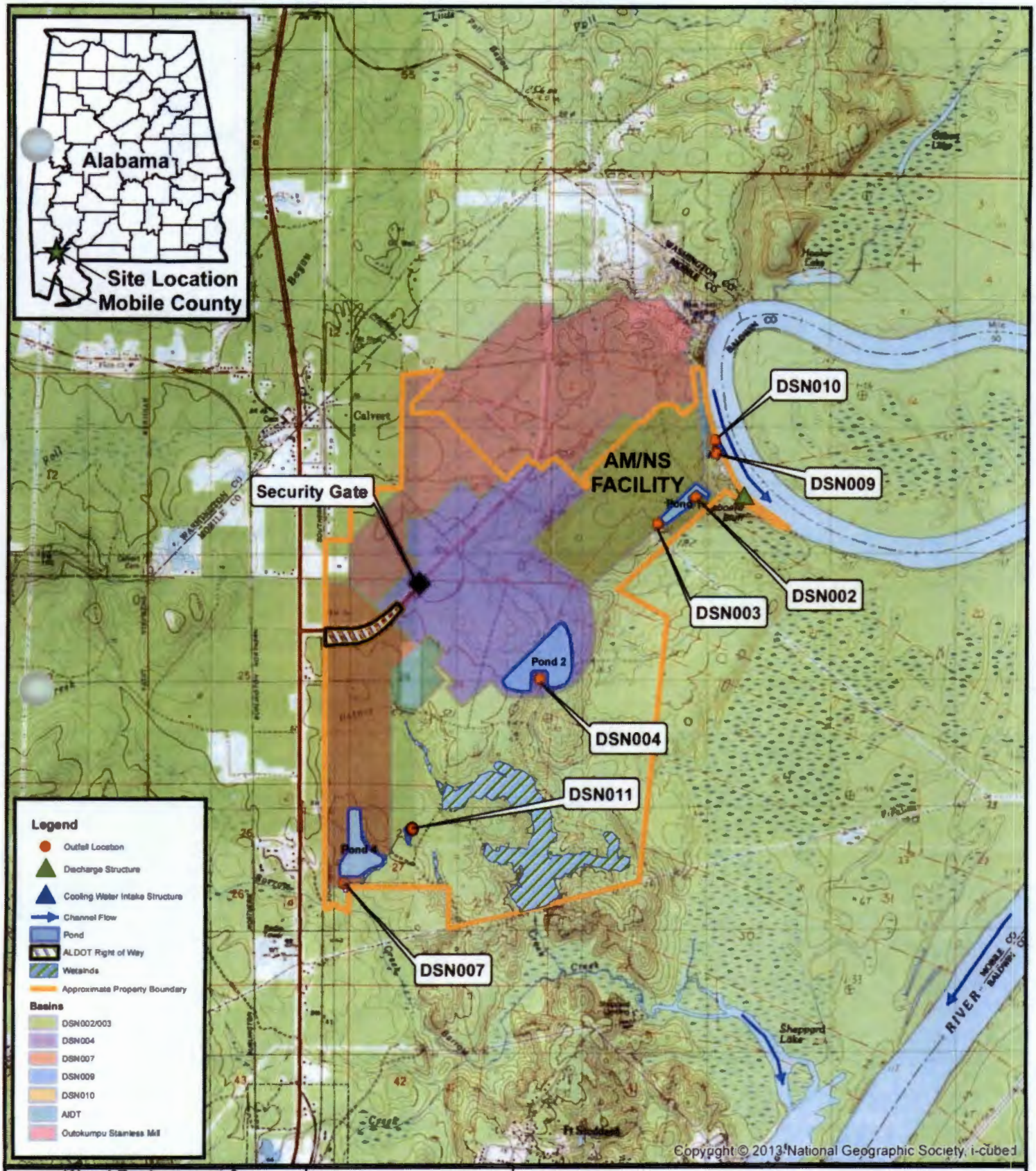

Wood Environment & Infrastructure Solutions, Inc. 169 Dauphin Street, Suite 320 Mobile, Alabama 36602	N	CLIENT **AM/NS Calvert, LLC**	
PROJECT AM/NS Calvert 1 AM/NS Drive Calvert, Alabama 36513	wood.	DWN BY SH / DATUM / DATE 1/6/2020 CHK'D BY ML / REV. NO. 1 / PROJECT NO. 6376191024	
TITLE **TOPOGRAPHICAL MAP**	0 1,700 3,400 6,800 Feet		FIGURE NO. 1

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EPA Form 1
Attachment A. AM/NS Calvert LLC List of Environmental Permits

AM/NS Calvert LLC List of Environmental Permits		
Permit Owner	**Permit Number**	**Permit Type**
AM/NS Calvert LLC	SAM-2007-635-DMY	Section 401 Water Quality Certification
	ALR10C05L	Construction Stormwater Permit
	072319001022BD	Department of Transportation Hazardous Materials Certificate of Registration
	ALR000042689	Hazardous Waste Generator
		Alabama Department of Public Health Radiation Control License

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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AL0080233	AM/NS Calvert LLC	

Form 2D NPDES

EPA

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

NEW MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURAL OPERATIONS THAT HAVE NOT YET COMMENCED DISCHARGE OF PROCESS WASTEWATER

SECTION 1. EXPECTED OUTFALL LOCATION (40 CFR 122.21(k)(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
DSN002	Sheppard Lake	31° 08′ 59.11″	-87° 58′ 35.86″
DSN003	Sheppard Lake	31° 08′ 53.76″	-87° 58′ 46.16″
		° ′ ″	° ′ ″

SECTION 2. EXPECTED DISCHARGE DATE (40 CFR 122.21(k)(2))

Expected Discharge Date

2.1

Month	Day	Year
July	01	2023

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

Average Flows and Treatment

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

****Outfall Number**** DSN002

Operations Contributing to Flow

Operation	Average Flow
See EPA Form 2D Attachment A	Intermittent mgd
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, ~~retention time, etc.~~)	Code from Exhibit 2D-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
Screening	1-T	
Sedimentation (settling) (> 24-hr retention time)	1-U	
Evaporation	1-F	
Discharge to surface water	4-A	

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Average Flows and Treatment Continued

3.1 Cont.

Outfall Number DSN003

Operations Contributing to Flow

Operation	Average Flow
See EPA Form 2D Attachment A	mgd
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Exhibit 2D-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
Same as DSN002		

Outfall Number _____

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd
	mgd

Treatment Units

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

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AL0080233	AM/NS Calvert LLC	

SECTION 4. LINE DRAWING (40 CFR 122.21(k)(3)(ii))

Line Drawing

4.1 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 2D–2 at end of instructions for example.)

☐ Yes ☐ No

SECTION 5. INTERMITTENT OR SEASONAL FLOWS (40 CFR 122.21(k)(3)(iii))

Intermittent or Seasonal Flows

5.1 Except for stormwater runoff, leaks, or spills, are any expected discharges described in Sections 1 and 3 intermittent or seasonal?

☐ Yes ☑ No ➔ SKIP to Section 6.

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

Outfall Number	Operations (list)	Frequency		Rate and Volume		Duration
		Average Days/Week	Average Months/Year	Maximum Daily Discharge	Maximum Total Volume	
		days/week	months/year	mgd	gallons	days
		days/week	months/year	mgd	gallons	days
		days/week	months/year	mgd	gallons	days

Outfall Number	Operations (list)	Frequency		Rate and Volume		Duration
		Average Days/Week	Average Months/Year	Maximum Daily Discharge	Maximum Total Volume	
		days/week	months/year	mgd	gallons	days
		days/week	months/year	mgd	gallons	days
		days/week	months/year	mgd	gallons	days

Outfall Number	Operations (list)	Frequency		Rate and Volume		Duration
		Average Days/Week	Average Months/Year	Maximum Daily Discharge	Maximum Total Volume	
		days/week	months/year	mgd	gallons	days
		days/week	months/year	mgd	gallons	days
		days/week	months/year	mgd	gallons	days

SECTION 6. PRODUCTION (40 CFR 122.21(k)(4))

Production

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

☑ Yes ☐ No ➔ SKIP to Section 7.

6.2 Provide the following information on applicable ELGs.

ELG Category	ELG Subcategory	Regulatory Citation
Inorganic Chemical Manufacturin	Oxygen and Nitrogen Production	40 CFR 415 Subpart AW

Note: Outfalls DSN002 & DSN003 will have discharges from the Air Separations Unit that are subject to 40 CFR 415 Subpart AW. Outfall DSN001 has discharges that are subject to 40 CFR 433 but they are already permitted.

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Production Continued

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

☑ Yes ☐ No ➔ SKIP to Section 7.

6.4 Provide an expected measure of average daily production expressed in terms and units of applicable ELGs.

Expected Actual Average Daily Production for First Three Years

Outfall Number	Year	Operation, Product, or Material	Quantity per Day (note basis if applicable)	Unit of Measure
DSN002/ 003	Year 1	Oxygen / Nitrogen / Argon	11,016 / 1,194 / 378	Nm3/hr
	Year 2	Oxygen / Nitrogen / Argon	22,032 / 2388 / 756	Nm3/hr
	Year 3	Oxygen / Nitrogen / Argon	22,032 / 2388 / 756	Nm3/hr
	Year 1			
	Year 2			
	Year 3			
	Year 1			
	Year 2			
	Year 3			

SECTION 7. EFFLUENT CHARACTERISTICS (40 CFR 122.21(k)(5))

Effluent Characteristics

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

Table A. Conventional and Non-Conventional Parameters

7.1 Are you requesting a waiver from your NPDES permitting authority for one or more of the Table A parameters 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 have provided estimates or actual data for all Table A parameters for 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 parameters at all outfalls.

Table B. Certain Conventional and Non-Conventional Pollutants

7.4 Have you checked "Believed Present" for all pollutants listed in Table B that are limited directly or indirectly by an applicable ELG?

☑ Yes ☐ No

7.5 Have you checked "Believed Present" or "Believed Absent" for all remaining pollutants listed in Table B?

☑ Yes ☐ No

7.6 Have you provided estimated data for those Table B pollutants for which you have indicated are "Believed Present" in your discharge?

☑ Yes ☐ No

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Effluent Characteristics Continued

Table C. Toxic Metals, Total Cyanide, and Total Phenols

7.7	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed on Table C for all outfalls?	☑ Yes ☐ No
7.8	Have you completed Table C by providing estimated data for pollutants you indicated are "Believed Present," including the source of the information, for each applicable outfall?	☑ Yes ☐ No

Table D. Organic Toxic Pollutants (GC/MS Fractions)

7.9	Do you qualify for a small business exemption under the criteria specified in the Instructions?	☐ Yes ➔ Note that you qualify at the top of Table D, then SKIP to Item 7.12. ☑ No
7.10	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed on Table D for all outfalls?	☑ Yes ☐ No
7.11	Have you completed Table D by providing estimated data for pollutants you indicated are "Believed Present," including the source of the information, for each applicable outfall?	☑ Yes ☐ No

2,3,7,8-Tetrachlorodibenzo-p-Dioxin (TCDD)

7.12	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 effluent from any of your outfalls?	☐ Yes ☑ No

Table E. Certain Hazardous Substances and Asbestos

7.13	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed in Table E for all outfalls?	☑ Yes ☐ No
7.14	Have you completed Table E by reporting the reason the pollutants are expected to be present and available quantitative data for pollutants you indicated are "Believed Present" for each applicable outfall?	☑ Yes ☐ No

Intake Credits, Tables A through E

7.15	Are you applying for net credits for the presence of any of the pollutants on Tables A through E for any of your outfalls?	☐ Yes ➔ Consult with your NPDES permitting authority. ☑ No

SECTION 8. ENGINEERING REPORT (40 CFR 122.21(k)(6))

Engineering Report

8.1	Do you have any technical evaluations of your wastewater treatment, including engineering reports or pilot plant studies?	☐ Yes ☑ No ➔ SKIP to Item 8.3.
8.2	Have you provided the technical evaluation and all related documents to this application package?	☐ Yes ☑ No
8.3	Are you aware of any existing plant(s) that resemble production processes, wastewater constituents, or wastewater treatment at your facility?	☐ Yes ☑ No ➔ SKIP to Section 9.

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Engineering Report Continued

8.4 Provide the name and location of the similar plants.

Name of Similar Plants	Location of Similar Plants

SECTION 9. OTHER INFORMATION (40 CFR 122.21(k)(7))

Other Information

9.1 Have you attached any optional information that you would like considered as part of the application review process (i.e., material beyond that which you have already noted in the application as being attached)?

☐ Yes ☑ No ➔ SKIP to Section 10.

9.2 List the additional items and briefly note why you have included them.

1.
2.
3.
4.
5.

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 2D 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 tables, or provide attachments.

Column 1	Column 2
☑ Section 1: Expected Outfall Location	☐ w/ attachments (e.g., responses for additional outfalls)
☑ Section 2: Expected Discharge Date	☐ w/ attachments
☑ Section 3: Average Flows and Treatment	☐ w/ attachments
☐ Section 4: Line Drawing	☐ w/ line drawing ☐ w/ additional attachments
☑ Section 5: Intermittent or Seasonal Flows	☐ w/ attachments
☑ Section 6: Production	☐ w/ attachments
☑ Section 7: Effluent Characteristics	☐ w/ Table A waiver request or approval ☑ Table A ☑ Table B ☑ Table C ☑ Table D ☐ Table E ☐ w/ other attachments
☑ Section 8: Engineering Report	☐ w/ technical evaluations and related attachments
☑ Section 9: Other Information	☐ w/ optional information
☑ Section 10: Checklist and Certification Statement	☐ w/ attachments

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Checklist and Certification Statement Continued

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
Phil Fultz	Chief Operating Officer
Signature	Date signed

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EPA Identification Number	Facility Name	Outfall Number	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AM/NS Calvert LLC		

TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETER ESTIMATES (40 CFR 122.21(k)(5)(i))[1]

	Pollutant	Waiver Requested (if applicable)	Units		Effluent Data: Maximum Daily Discharge (required)	Effluent Data: Average Daily Discharge (if available)	Effluent Data: Source of Information (use codes in instructions)	Intake Water: Believed Present? (check only one response per parameter)	
☐	Check here if you have applied to your NPDES 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	<3.0		4	☐ Yes	☐ No
			Mass						
2.	Chemical oxygen demand (COD)	☐	Concentration	mg/L	32		4	☐ Yes	☑ No
			Mass						
3.	Total organic carbon (TOC)	☐	Concentration	mg/L	<25		4	☐ Yes	☐ No
			Mass						
4.	Total suspended solids (TSS)	☐	Concentration	mg/L	130		4	☐ Yes	☐ No
			Mass						
5.	Ammonia (as N)	☐	Concentration	mg/L	<2		4	☐ Yes	☐ No
			Mass						
6.	Flow	☐	Rate	mgd	intermittent		4	☐ Yes	☐ No
7.	Temperature (winter)	☐	°C	°C	28		4	☐ Yes	☐ No
	Temperature (summer)	☐	°C	°C	18		4		
8.	pH (minimum)	☐	Standard units	s.u.	6		4	☐ Yes	☐ No
	pH (maximum)	☐	Standard units	s.u.	9		4		

[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 B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(k)(5)(ii))[1]

	Pollutant	Presence or Absence (check one)		Estimated Data for Pollutants Expected to be Present or Limited by an ELG (Provide both concentration and mass estimates for each pollutant.)					
				Effluent					Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge (required)	Average Daily Discharge (if available)	Source of Information (use codes in instructions)	Believed Present? (check only one response per item)
☐	Check (✓) here if you believe all pollutants listed to be absent from the discharge. You need not complete Table B for the noted outfall *unless* you have quantitative data available.								
1.	Bromide (24959-67-9)	☑	☐	Concentration	mg/L	<0.05		5 - sample result	☐ Yes ☐ No
				Mass					
2.	Chlorine, total residual	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
3.	Color	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
4.	Fecal coliform	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
5.	Fluoride (16984-48-8)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
6.	Nitrate-nitrite	☑	☐	Concentration	mg/L	<0.025		5 - sample result	☐ Yes ☐ No
				Mass					
7.	Nitrogen, total organic (as N)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
8.	Oil and grease	☑	☐	Concentration	mg/L	<2.5		5 - sample result	☐ Yes ☐ No
				Mass					
9.	Phosphorus (as P), total (7723-14-0)	☑	☐	Concentration	mg/L	<0.05		5 - sample result	☐ Yes ☐ No
				Mass					
10.	Sulfate (as SO_4) (14808-79-8)	☑	☐	Concentration	mg/L	5.8		5 - sample result	☐ Yes ☐ No
				Mass					
11.	Sulfide (as S)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					

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TABLE B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(k)(5)(ii))[1]

	Pollutant	Presence or Absence (check one)		Estimated Data for Pollutants Expected to be Present or Limited by an ELG (Provide both concentration and mass estimates for each pollutant.)					
				Effluent					Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge (required)	Average Daily Discharge (if available)	Source of Information (use codes in instructions)	Believed Present? (check only one response per item)
12.	Sulfite (as SO_3) (14265-45-3)	☑	☐	Concentration	mg/L	0.64		5 - sample	☐ Yes ☐ No
				Mass					
13.	Surfactants	☑	☐	Concentration	mg/L	<0.01		5 - sample	☐ Yes ☐ No
				Mass					
14.	Aluminum, total (7429-90-5)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
15.	Barium, total (7440-39-3)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
16.	Boron, total (7440-42-8)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
17.	Cobalt, total (7440-48-4)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
18.	Iron, total (7439-89-6)	☑	☐	Concentration	mg/L	<1.0		4	☐ Yes ☐ No
				Mass					
19.	Magnesium, total (7439-95-4)	☑	☐	Concentration	mg/L	4.9		5 - sample	☐ Yes ☐ No
				Mass					
20.	Molybdenum, total (7439-98-7)	☑	☐	Concentration	mg/L	0.025		5 - sample	☐ Yes ☐ No
				Mass					
21.	Manganese, total (7439-96-5)	☑	☐	Concentration	mg/L	0.188		5 - sample	☐ Yes ☐ No
				Mass					
22.	Tin, total (7440-31-5)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					

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TABLE B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(k)(5)(ii))[1]

Pollutant		Presence or Absence (check one)		Estimated Data for Pollutants Expected to be Present or Limited by an ELG (Provide both concentration and mass estimates for each pollutant.)					
				Effluent					Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge (required)	Average Daily Discharge (if available)	Source of Information (use codes in instructions)	Believed Present? (check only one response per item)
23.	Titanium, total (7440-32-6)	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
24.	Radioactivity								
24.1	Alpha, total	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
24.2	Beta, total	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
24.3.	Radium, total	☐	☑	Concentration				4	☐ Yes ☐ No
				Mass					
24.4	Radium 226, total	☐	☑	Concentration				4	☐ Yes ☐ No
				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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TABLE C. TOXIC METALS, TOTAL CYANIDE, AND TOTAL PHENOLS (40 CFR 122.21(k)(5)(iii)(A))[1]

	Pollutant (CAS Number, if available)	Presence or Absence (check one)		Estimated Data for Pollutants Expected to be Present in Discharge (Provide both concentration and mass estimates for each pollutant.)						
				Effluent					Intake Water	
		Believed Present	Believed Absent	Units		Maximum Daily Discharge (required)	Average Daily Discharge (if available)	Source of Information (Use codes in Instructions.)	Believed Present? (Check only one response per pollutant.)	
☐	Check (✓) here if you believe all pollutants listed to be absent from the discharge. You need not complete Table C for the noted outfall *unless* you have quantitative data available.									
1.	Antimony, Total (7440-36-0)	☐	☑	Concentration				4	☐ Yes	☐ No
				Mass						
2.	Arsenic, Total (7440-38-2)	☐	☑	Concentration				4	☐ Yes	☐ No
				Mass						
3.	Beryllium, Total (7440-41-7)	☐	☑	Concentration				4	☐ Yes	☐ No
				Mass						
4.	Cadmium, Total (7440-43-9)	☑	☐	Concentration	mg/L	<0.0025		5 - sample	☐ Yes	☐ No
				Mass						
5.	Chromium, Total (7440-47-3)	☑	☐	Concentration	mg/L	0.062		5 - sample	☐ Yes	☐ No
				Mass						
6.	Copper, Total (7440-50-8)	☑	☐	Concentration	mg/L	<0.005		5 - sample	☐ Yes	☐ No
				Mass						
7.	Lead, Total (7439-92-1)	☑	☐	Concentration	mg/L	0.0028		5 - sample	☐ Yes	☐ No
				Mass						
8.	Mercury, Total (7439-97-6)	☑	☐	Concentration	mg/L	<0.0001		5 - sample	☐ Yes	☐ No
				Mass						
9.	Nickel, Total (7440-02-0)	☑	☐	Concentration	mg/L	<0.02		5 - sample	☐ Yes	☐ No
				Mass						
10.	Selenium, Total (7782-49-2)	☑	☐	Concentration	mg/L	<0.005		4	☐ Yes	☐ No
				Mass						
11.	Silver, Total (7440-22-4)	☑	☐	Concentration	mg/L	<0.005		5 - sample	☐ Yes	☐ No
				Mass						
12.	Thallium, Total (7440-28-0)	☐	☑	Concentration				4	☐ Yes	☐ No
				Mass						
13.	Zinc, Total (7440-66-6)	☑	☐	Concentration	mg/L	0.044		5 - sample	☐ Yes	☐ No
				Mass						
14.	Cyanide, Total (57-12-5)	☐	☑	Concentration				4	☐ Yes	☐ No
				Mass						
15.	Phenols, Total	☐	☑	Concentration				4	☐ Yes	☐ No
				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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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

Pollutant (CAS Number, if available)		Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
					Effluent			Intake Water	
		Believed Present	Believed Absent	Units	Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)	
☑	Check here if all pollutants listed in Table D are expected to be absent from your facility's discharge.								
☐	Check here if the facility believes it is exempt from Table D reporting requirements because it is a qualified small business. See the instructions for exemption criteria and for a list of materials you must attach to the application.								
Note: If you check either of the above boxes, you do not need to complete Table D for the noted outfall *unless* you have quantitative data available.									
1. Organic Toxic Pollutants (GC/MS Fraction—Volatile Compounds)									
1.1	Acrolein (107-02-8)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.2	Acrylonitrile (107-13-1)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.3	Benzene (71-43-2)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.4	Bromoform (75-25-2)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.5	Carbon tetrachloride (56-23-5)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.6	Chlorobenzene (108-90-7)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.7	Chlorodibromomethane (124-48-1)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.8	Chloroethane (75-00-3)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.9	2-chloroethylvinyl ether (110-75-8)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.10	Chloroform (67-66-3)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					
1.11	Dichlorobromomethane (75-27-4)	☐	☐	Concentration				☐ Yes	☐ No
				Mass					

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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

Pollutant (CAS Number, if available)		Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
1.12	1,1-dichloroethane (75-34-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.13	1,2-dichloroethane (107-06-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.14	1,1-dichloroethylene (75-35-4)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.15	1,2-dichloropropane (78-87-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.16	1,3-dichloropropylene (542-75-6)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.17	Ethylbenzene (100-41-4)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.18	Methyl bromide (74-83-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.19	Methyl chloride (74-87-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.20	Methylene chloride (75-09-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.21	1,1,2,2-tetrachloroethane (79-34-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.22	Tetrachloroethylene (127-18-4)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.23	Toluene (108-88-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.24	1,2-trans-dichloroethylene (156-60-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					

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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

Pollutant (CAS Number, if available)		Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
1.25	1,1,1-trichloroethane (71-55-6)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.26	1,1,2-trichloroethane (79-00-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.27	Trichloroethylene (79-01-6)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
1.28	Vinyl chloride (75-01-4)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2. Organic Toxic Pollutants (GC/MS Fraction—Acid Compounds)									
2.1	2-chlorophenol (95-57-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.2	2,4-dichlorophenol (120-83-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.3	2,4-dimethylphenol (105-67-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.4	4,6-dinitro-o-cresol (534-52-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.5	2,4-dinitrophenol (51-28-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.6	2-nitrophenol (88-75-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.7	4-nitrophenol (100-02-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.8	p-chloro-m-cresol (59-50-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.9	Pentachlorophenol (87-86-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					

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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

	Pollutant (CAS Number, if available)	Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
2.10	Phenol (108-95-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
2.11	2,4,6-trichlorophenol (88-05-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3. Organic Toxic Pollutants (GC/MS Fraction—Base /Neutral Compounds)									
3.1	Acenaphthene (83-32-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.2	Acenaphthylene (208-96-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.3	Anthracene (120-12-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.4	Benzidine (92-87-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.5	Benzo (a) anthracene (56-55-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.6	Benzo (a) pyrene (50-32-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.7	3,4-benzofluoranthene (205-99-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.8	Benzo (ghi) perylene (191-24-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.9	Benzo (k) fluoranthene (207-08-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.10	Bis (2-chloroethoxy) methane (111-91-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.11	Bis (2-chloroethyl) ether (111-44-4)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					

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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

Pollutant (CAS Number, if available)		Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
3.12	Bis (2-chloroisopropyl) ether (102-80-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.13	Bis (2-ethylhexyl) phthalate (117-81-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.14	4-bromophenyl phenyl ether (101-55-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.15	Butyl benzyl phthalate (85-68-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.16	2-chloronaphthalene (91-58-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.17	4-chlorophenyl phenyl ether (7005-72-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.18	Chrysene (218-01-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.19	Dibenzo (a,h) anthracene (53-70-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.20	1,2-dichlorobenzene (95-50-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.21	1,3-dichlorobenzene (541-73-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.22	1,4-dichlorobenzene (106-46-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.23	3,3-dichlorobenzidine (91-94-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.24	Diethyl phthalate (84-66-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.25	Dimethyl phthalate (131-11-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					

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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

	Pollutant (CAS Number, if available)	Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
3.26	Di-n-butyl phthalate (84-74-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.27	2,4-dinitrotoluene (121-14-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.28	2,6-dinitrotoluene (606-20-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.29	Di-n-octyl phthalate (117-84-0)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.30	1,2-diphenylhydrazine (as azobenzene) (122-66-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.31	Fluoranthene (206-44-0)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.32	Fluorene (86-73-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.33	Hexachlorobenzene (118-74-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.34	Hexachlorobutadiene (87-68-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.35	Hexachlorocyclopentadiene (77-47-4)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.36	Hexachloroethane (67-72-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.37.	Indeno (1,2,3-cd) pyrene (193-39-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.38	Isophorone (78-59-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.39	Naphthalene (91-20-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					

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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

	Pollutant (CAS Number, if available)	Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
3.40	Nitrobenzene (98-95-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.41	N-nitrosodimethylamine (62-75-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.42	N-nitrosodi-n-propylamine (621-64-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.43	N-nitrosodiphenylamine (86-30-6)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.44	Phenanthrene (85-01-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.45	Pyrene (129-00-0)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
3.46	1,2,4-trichlorobenzene (120-82-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4. Organic Toxic Pollutants (GC/MS Fraction—Pesticides)									
4.1.	Aldrin (309-00-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.2	α-BHC (319-84-6)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.3	β-BHC (319-85-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.4	γ-BHC (58-89-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.5	δ-BHC (319-86-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.6	Chlordane (57-74-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					

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EPA Identification Number	Facility Name	Outfall Number	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AM/NS Calvert LLC		

TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

Pollutant (CAS Number, if available)		Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
4.7	4,4'-DDT (50-29-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.8	4,4'-DDE (72-55-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.9	4,4'-DDD (72-54-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.10	Dieldrin (60-57-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.11	α-endosulfan (115-29-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.12	β-endosulfan (115-29-7)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.13	Endosulfan sulfate (1031-07-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.14	Endrin (72-20-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.15	Endrin aldehyde (7421-93-4)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					

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TABLE D. ORGANIC TOXIC POLLUTANTS (Gas Chromatography/Mass Spectrometry or GC/MS Fractions) (40 CFR 122.21(k)(5)(iii)(B))[1]

Pollutant (CAS Number, if available)		Presence or Absence (check one)		Estimated Data for Pollutants Expected to Be Present in Discharge (provide both concentration and mass estimates for each pollutant)					
						Effluent			Intake Water
		Believed Present	Believed Absent	Units		Maximum Daily Discharge	Average Daily Discharge	Source of Information (use codes in instructions)	Believed Present? (check only one response per pollutant)
4.16	Heptachlor (76-44-8)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.17	Heptachlor epoxide (1024-57-3)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.18	PCB-1242 (53469-21-9)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.19	PCB-1254 (11097-69-1)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.20	PCB-1221 (11104-28-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.21	PCB-1232 (11141-16-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.22	PCB-1248 (12672-29-6)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.23	PCB-1260 (11096-82-5)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.24	PCB-1016 (12674-11-2)	☐	☐	Concentration					☐ Yes ☐ No
				Mass					
4.25	Toxaphene (8001-35-2)	☐	☐	Concentration					☐ Yes ☐ No
				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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TABLE E. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(k)(5)(v))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
☑	Check (✓) here if you believe all pollutants listed to be absent from the discharge. You need not complete Table E for the noted outfall *unless* you have quantitative data available.				
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	☐	☐		

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TABLE E. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(k)(5)(v))[1]

Pollutant		Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
19.	Cyclohexane	☐	☐		
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	☐	☐		

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TABLE E. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(k)(5)(v))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
38.	Furfural	☐	☐		
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	☐	☐		

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TABLE E. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(k)(5)(v))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
57.	Parathion	☐	☐		
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	☐	☐		

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TABLE E. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(k)(5)(v))[1]

Pollutant		Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
76.	Vanadium	☐	☐		
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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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AL0080233	AM/NS Calvert LLC	

FORM 2E NPDES

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

MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURAL FACILITIES WHICH DISCHARGE ONLY NONPROCESS WASTEWATER

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(h)(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
DSN002	Sheppard Lake	31° 08′ 59.11″	-87° 58′ 35.86″
DSN003	Sheppard Lake	31° 08′ 53.76″	-87° 58′ 46.16″
		° ′ ″	° ′ ″

SECTION 2. DISCHARGE DATE (40 CFR 122.21(h)(2))

Discharge Date

2.1 Are you a new or existing discharger? (Check only one response.)

☐ New discharger ☑ Existing discharger ➔ SKIP to Section 3.

2.2 Specify your anticipated discharge date:

SECTION 3. WASTE TYPES (40 CFR 122.21(h)(3))

Waste Types

3.1 What types of wastes are currently being discharged if you are an existing discharger or will be discharged if you are a new discharger? (Check all that apply.)

☐ Sanitary wastes
☐ Restaurant or cafeteria waste
☑ Non-contact cooling water
☑ Other nonprocess wastewater (describe/explain directly below)

See EPA Form 2E Attachment A

3.2 Does the facility use cooling water additives?

☑ Yes ☐ No ➔ SKIP to Section 4.

3.3 List the cooling water additives used and describe their composition.

Cooling Water Additives (list)	Composition of Additives (if available to you)
See ADEM Form 187 Attachment C	See ADEM Form 187 Attachment C

SECTION 4. EFFLUENT CHARACTERISTICS (40 CFR 122.21(h)(4))

Effluent Characteristics

4.1 Have you completed monitoring for all parameters in the table below at each of your outfalls and attached the results to this application package?

☑ Yes ☐ No; a waiver has been requested from my NPDES permitting authority (attach waiver request and additional information) ➔ SKIP to Section 5.

4.2 Provide data as requested in the table below.[1] (See instructions for specifics.)

Parameter or Pollutant	Number of Analyses (if actual data reported)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Source (use codes per instructions)
		Mass	Conc.	Mass	Conc.	
Biochemical oxygen demand (BOD_5)	1		< 3 mg/L			sample
Total suspended solids (TSS)	4		309 mg/L		213 mg/	DMR
Oil and grease	4		15 mg/L		6.27 mg/	DMR
Ammonia (as N)	1		<0.05 mg/l			sample
Discharge flow	4	20.71 MGD				DMR
pH (report as range)	4	7.25 - 8.62 s.u.				DMR
Temperature (winter)	1	56.5 F				sample
Temperature (summer)						

[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	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AL0080233	AM/NS Calvert LLC	

Effluent Characteristics Continued

4.3 Is fecal coliform believed present, or is sanitary waste discharged (or will it be discharged)?

☐ Yes ☑ No ➔ SKIP to Item 4.5.

4.4 Provide data as requested in the table below.[1] (See instructions for specifics.)

Parameter or Pollutant	Number of Analyses (if actual data reported)	Maximum Daily Discharge (specify units) Mass	Maximum Daily Discharge (specify units) Conc.	Average Daily Discharge (specify units) Mass	Average Daily Discharge (specify units) Conc.	Source (Use codes per Instructions.)
Fecal coliform						
E. coli						
Enterococci						

4.5 Is chlorine used (or will it be used)?

☑ Yes ☐ No ➔ SKIP to Item 4.7.

4.6 Provide data as requested in the table below.[1] (See instructions for specifics.)

Parameter or Pollutant	Number of Analyses (if actual data reported)	Maximum Daily Discharge (specify units) Mass	Maximum Daily Discharge (specify units) Conc.	Average Daily Discharge (specify units) Mass	Average Daily Discharge (specify units) Conc.	Source (use codes per instructions)
Total Residual Chlorine	Due to the non-continuous nature of the discharge and large residence time from Pond 1, chlorine residuals are not expected in the discharge.					

4.7 Is non-contact cooling water discharged (or will it be discharged)?

☑ Yes ☐ No ➔ SKIP to Section 5.

4.8 Provide data as requested in the table below.[1] (See instructions for specifics.)

Parameter or Pollutant	Number of Analyses (if actual data reported)	Maximum Daily Discharge (specify units) Mass	Maximum Daily Discharge (specify units) Conc.	Average Daily Discharge (specify units) Mass	Average Daily Discharge (specify units) Conc.	Source (use codes per instructions)
Chemical oxygen demand (COD)	4		22 mg/L		17 mg/l	DMR
Total organic carbon (TOC)						

SECTION 5. FLOW (40 CFR 122.21(h)(5))

Flow

5.1 Except for stormwater water runoff, leaks, or spills, are any of the discharges you described in Sections 1 and 3 of this application intermittent or seasonal?

☐ Yes ➔ Complete this section. ☑ No ➔ SKIP to Section 6.

5.2 Briefly describe the frequency and duration of flow.

Industrial stormwater runoff and non-process water from a portion of the site flow into Pond 1, which discharges through the permitted outfalls DSN002 and DSN003. The frequency and duration of discharge is rainfall-dependent. DSN002 & DSN 003 discharge from Pond 1. Pond 1 is constructed with a large diameter stand pipes as the discharge structures and it provides passive containment when not in an overflow condition.

SECTION 6. TREATMENT SYSTEM (40 CFR 122.21(h)(6))

Treatment System

6.1 Briefly describe any treatment system(s) used (or to be used).

Please refer to Operation Best Management Practice (BMP), revised November 2017. The BMP is currently under revision to include changes associated with the addition of the electric arc furnaces and supporting facilities.

[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	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AL0080233	AM/NS Calvert LLC	

SECTION 7. OTHER INFORMATION (40 CFR 122.21(h)(7))

Other Information

7.1 Use the space below to expand upon any of the above items. Use this space to provide any information you believe the reviewer should consider in establishing permit limitations. Attach additional sheets as needed.

Outfall DSN002 and DSN003 discharge from Pond 1. Discharge from DSN002 occurs prior to discharge from DSN003 because DSN003 is at an elevation approximately 3 feet higher than DSN002. They are considered significantly similar outfalls. DSN002 is sampled and DSN003 is not required to be sampled.

SECTION 8. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

8.1 In Column 1 below, mark the sections of Form 2E 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: Outfall Location	☐ w/ attachments (e.g., responses for additional outfalls)
☑ Section 2: Discharge Date	☐ w/ attachments
☑ Section 3: Waste Types	☑ w/ attachments EPA Form 2E Attachment A
☑ Section 4: Effluent Characteristics	☐ w/ attachments
☑ Section 5: Flow	☐ w/ attachments
☑ Section 6: Treatment System	☐ w/ attachments
☑ Section 7: Other Information	☐ w/ attachments
☑ Section 8: Checklist and Certification Statement	☐ w/ attachments

8.2 **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
Phil Fultz	Chief Operating Officer
Signature	Date signed

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EPA Form 2E
Attachment A. AM/NS Calvert LLC Wastewater Sources

Outfall	Wastewater Sources
DSN002 & DSN003	Utility wastewaters including those listed below
	Condensates
	Non-contact cooling water
	Boiler blowdown
	Demineralizer blowdown/backwash water
	Equipment/vehicle rinse waters
	Fire suppression water
	Dust suppression water
	RO reject water
	Treated river water tank effluent/overflow
	Air separation unit (ASU) condensate, non-contact cooling water, and cleaning waters
	Stormwater associated with carbon steel manufacturing and processing

Note: DSN 002 and DSN 003 discharge from Pond 1. They are considered significantly similar outfalls. DSN002 is sampled and DSN 003 is not required to be sampled.

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EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110069711869	AL0080233	AM/NS Calvert LLC	

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
	See EPA Form 2F	° ' "	° ' "
	Attachment A	° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "
		° ' "	° ' "

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
110069711869	AL0080233	AM/NS Calvert LLC	

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)	
	See EPA Form 2F	*specify units*		*specify units*
	Attachment B	*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.)

Please refer to Chapter 3.0 of the Operation Best Management Practices (BMP) plan, revised July 2022, for significant materials information. The BMP plan will be revised as needed for the addition of the electric arc furnaces and supporting facilities.

After hand-weeding, Reward Herbicide is spot-spared in landscaped areas and rock borders during prime growing season. It is applied approximately every 3 weeks, as needed. Reward Herbicide (6,7-dihydrodipyrido(1,2-a:2',1'-c) pyrazinedium dibromide is stored in liquid form in a 2.5 gallon plastic containers. Fertilizer(13-13-13 fertilizer) is used in new construction areas to establish plant growth. The fertilizer is stored in granular form in 40-pound bags. No pesticides or soil conditioners are used at the site.

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)**
All	Refer to the Operations BMP Plan and the Spill Prevention, Control, and Countermeasures	1-T
	(SPCC) Plan (Onshore, Non-production Facility) both updated in July 2022	1-U
		1-F
		4-A

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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
Phil Fultz	Chief Operating Officer
Signature	**Date signed**

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
DSN007	EPA 40 CFR 136	08/27/2019	DSN007
DSN007	EPA 40 CFR 136	09/05/2019	DSN007
DSN010	EPA 40 CFR 136	12/21/2019	DSN010
DSN002	EPA 40 CFR 136	12/17/2019	DSN002
DSN004	EPA 40 CFR 136	12/17/2019	DSN004
DSN009	EPA 40 CFR 136	12/17/2019	DSN009

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.

There were three spills at the facility in the last three years.

- A spill of sodium hydroxide occured on June 4, 2021 from a broken underground pipe.The spilled material was contained on the AM/NS site.
- A spill occurred on 5/15/2021 which resulted in a release of approximately 3,400 gallons of treated effluent wastewater that flowed to Pond 1.
- An equipment failure occurred on 4/14/2021 resulting in the spill of less than 1 gallon of gear oil on the slab barge, river and terminal dock. It was estimated less than half a gallon of gear oil spilled into the Tombigbee River.

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

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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

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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. Relevant pollutants listed in NPDES	4. Manganese - in raw materials	7.
2. Magnesium - in raw materials	5. Sulfate/sulfide - pickling	8.
3. Molybdenum - in raw materials	6.	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
Acute Toxicity	DSN001 NPDES Compliance	☑ Yes ☐ No	Quarterly testing results submitted to ADEM
		☐ 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	Pace Analytical Services, LLC	Micro-Methods Laboratory, Inc	Auburn Environmental Consulting and Testing
Laboratory address	169 Dauphin Street, Suite 201, Mobile, AL, 36602	6500 Sunplex Drive Ocean Springs, MS 39564	6485 Lee Road 54 Auburn, AL 36830
Phone number	(251) 344-9106	(228) 875-6420	(334) 745-0055
Pollutant(s) analyzed	All parameters except WET testing (All outfalls except Outfall DSN010)	All parameters except WET testing (Outfall DSN010 only)	WET Testing

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110069711869	AL0080233	AM/NS Calvert LLC	

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
Phil Fultz	Chief Operating Officer
Signature	Date signed

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110069711869	AL0080233	AM/NS Calvert LLC	DSN002 / DSN003

Form Approved 03/05/19
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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	<2.5 mg/L		<2.5 mg/L		12	
2.	Biochemical oxygen demand (BOD_5)	<3.0 mg/L				1	
3.	Chemical oxygen demand (COD)	32 mg/L		<13 mg/L		2	
4.	Total suspended solids (TSS)	130 mg/L		<36 mg/L		4	
5.	Total phosphorus	< 0.05 mg/L				1	
6.	Total Kjeldahl nitrogen (TKN)	0.37 mg/L				1	
7.	Total nitrogen (as N)	0.39 mg/L				1	
8.	pH (minimum)	5.6 SU				12	
	pH (maximum)	9.0 SU				12	

[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
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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		
Temperature	56.5 F				1	
Dissolved Oxygen	7.4 mg/L				1	
nitrogen, Ammonia Total	< 0.05 mg/L				1	
Nitrite Plus Nitrate, Total	< 0.025 mg/L				1	
Cyanide, Total	< 0.01 mg/L				1	
Cadmium, Total	< 2.5 ug/L				1	
Chromium, Total	0.062 mg/L		< 0.027 mg/L		12	
Copper, Total	< 5 ug/L				1	
Lead, Total	0.0028 mg/L		< 0.0025 mg/L		12	
Nickel, Total	< 0.02 mg/L		< 0.019 mg/L		2	
Silver, Total	< 5 ug/L				1	
Zinc, Total	0.044 mg/L		< 0.02 mg/L		12	
Mercury	< 0.0001 mg/L		< 0.0000169 mg/L		12	
CBOD	< 3 mg/L				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
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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		
Bromide	< 0.05 mg/L				1	
Nitrate-nitrite	< 0.025 mg/L				1	
Oil and Grease	< 2.5 mg/L		< 2.5 mg/L		12	
Phosphorus, Total	< 0.05 mg/L				1	
Sulfate	5.8 mg/L				1	
Sulfite	0.64 mg/L				1	
Surfactants	< 0.1 mg/L				1	
Magnesium	4,960 ug/L				1	
Molybdenum	25 ug/L				1	
Manganese	188 ug/L				1	
Cadmium	< 2.5 ug/L				1	
Chromium	0.062 mg/L		< 0.027 mg/L		12	
Copper	< 5 ug/L				1	
Lead	0.0028 mg/L		< 0.0025 mg/L		12	
Nickel	< 0.02 mg/L		< 0.19 mg/L		12	
Silver	< 5 ug/L				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
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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)
12/17/2019	24	1.41	96	0.32 MGD	0.32 MGD

Provide a description of the method of flow measurement or estimate.

Rainfall runoff calculation using time of concentration, curve number, initial abstraction, and storm duration.

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110069711869	AL0080233	AM/NS Calvert LLC	DSN004

Form Approved 03/05/19
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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	< 2.5 mg/L		< 2.5 mg/L		12	
2.	Biochemical oxygen demand (BOD_5)	< 3.0 mg/L				1	
3.	Chemical oxygen demand (COD)	27 mg/L		< 16 mg/L		12	
4.	Total suspended solids (TSS)	130 mg/L		< 28 mg/L		12	
5.	Total phosphorus	0.25 mg/L				1	
6.	Total Kjeldahl nitrogen (TKN)	0.48 mg/L				1	
7.	Total nitrogen (as N)	0.48 mg/L				1	
8.	pH (minimum)	5.2 SU				12	
	pH (maximum)	9.1 SU				12	

[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
110069711869	AL0080233	AM/NS Calvert LLC	DSN004

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		
Temperature	58 F				1	
Dissolved Oxygen	7.2 mg/L				1	
nitrogen, Ammonia Total	< 0.05 mg/L				1	
Nitrite Plus Nitrate, Total	< 0.025 mg/L				1	
Cyanide, Total	< 0.01 mg/L				1	
Cadmium, Total	< 2.5 ug/L				1	
Chromium, Total	0.0081 mg/L		< 0.005 mg/L		12	
Copper, Total	< 5 ug/L				1	
Lead, Total	0.004 mg/L		< 0.0026 mg/L		12	
Nickel, Total	< 0.02 mg/L		< 0.02 mg/L		12	
Silver, Total	< 5 ug/L				1	
Zinc, Total	0.041 mg/L		< 0.01 mg/L		12	
Mercury	< 0.0001 mg/L		< 0.000019 mg/L		12	
CBOD	< 3 mg/L				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
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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		
Bromide	< 0.05 mg/L				1	
Nitrate-nitrite	< 0.025 mg/L				1	
Oil and Grease	< 2.5 mg/L		< 2.5 mg/L		12	
Phosphorus, Total	0.25 mg/L				1	
Sulfate	2.5 mg/L				1	
Sulfite	0.64 mg/L				1	
Surfactants	< 0.100 mg/L				1	
Magnesium	1,730 ug/L				1	
Molybdenum	< 5 ug/L				1	
Manganese	27.8 ug/L				1	
Cadmium	< 2.5 ug/L				1	
Chromium	0.0081 mg/L		< 0.005 mg/L		12	
Copper	< 5 ug/L				1	
Lead	0.004 mg/L		< 0.0026 mg/L		12	
Nickel	< .02 mg/L		< 0.02 mg/L		12	
Silver	< 5 ug/L				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
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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)
12/17/2019	24	1.41	96	5.11 MGD	5.11 MGD

Provide a description of the method of flow measurement or estimate.

Rainfall runoff calculation using time of concentration, curve number, initial abstraction, and storm duration.

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110069711869	AL0080233	AM/NS Calvert LLC	DSN007

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	< 2.5 mg/L		< 2.5 mg/L		12	
2.	Biochemical oxygen demand (BOD_5)	< 3.0 mg/L				1	
3.	Chemical oxygen demand (COD)	31 mg/L		< 19 mg/L		12	
4.	Total suspended solids (TSS)	42 mg/L		< 10 mg/L		12	
5.	Total phosphorus	< 50 ug/L				1	
6.	Total Kjeldahl nitrogen (TKN)	301 ug/L				1	
7.	Total nitrogen (as N)	413 ug/L				1	
8.	pH (minimum)	5.4 SU				12	
	pH (maximum)	8.9 SU				12	

[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
110069711869	AL0080233	AM/NS Calvert LLC	DSN007

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		
Temperature	61.1 F				1	
Dissolved Oxygen	10.1 mg/L				1	
nitrogen, Ammonia Total	< 50 ug/L				1	
Nitrite Plus Nitrate, Total	112 ug/L				1	
Cyanide, Total	< 0.01 mg/L				1	
Cadmium, Total	< 5 ug/L				1	
Chromium, Total	0.0062 mg/L		< 0.005 mg/L		12	
Copper, Total	< 10 ug/L				1	
Lead, Total	< 0.0025 mg/L		< 0.0024 mg/L		12	
Nickel, Total	< 0.02 mg/L		< 0.02 mg/L		12	
Silver, Total	< 10 ug/L				1	
Zinc, Total	0.026 mg/L		< 0.01 mg/L		12	
Mercury	0.000842 mg/L				1	
CBOD	< 3 mg/L				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
110069711869	AL0080233	AM/NS Calvert LLC	DSN007

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		
Bromide	< 0.05 mg/L				1	
Nitrate-nitrite	112 ug/L				1	
Oil and Grease	< 2.5 mg/L		< 2.5 mg/L		12	
Phosphorus, Total	< 50 ug/L				1	
Sulfate	1.3 mg/L				1	
Sulfite	0.64 mg/L				1	
Surfactants	< 0.1 mg/L				1	
Magnesium	< 2,090 ug/L				1	
Molybdenum	< 10 ug/L				1	
Manganese	< 10 ug/L				1	
Cadmium	< 5 ug/L				1	
Chromium	0.0062 mg/L		< 0.005 mg/L		12	
Copper	< 10 ug/L				1	
Lead	< 0.0025 mg/L		< 0.0024 mg/L		12	
Nickel	< 0.02 mg/L		< 0.02 mg/L		12	
Silver	< 10 ug/L				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
110069711869	AL0080233	AM/NS Calvert LLC	DSN007

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)
12/17/2019	24	1.41	96	2.22 MGD	2.22 MGD

Provide a description of the method of flow measurement or estimate.

Rainfall runoff calculation using time of concentration, curve number, initial abstraction, and storm duration.

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110069711869	AL0080233	AM/NS Calvert LLC	DSN009

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	< 2.5 mg/L		< 2.5 mg/L		12	
2.	Biochemical oxygen demand (BOD_5)	< 3.0 mg/L				1	
3.	Chemical oxygen demand (COD)	36 mg/L		< 17 mg/L		12	
4.	Total suspended solids (TSS)	140 mg/L		< 42 mg/L		12	
5.	Total phosphorus	< 0.05 mg/L				1	
6.	Total Kjeldahl nitrogen (TKN)	0.02 mg/L				1	
7.	Total nitrogen (as N)	0.22 mg/L				1	
8.	pH (minimum)	5.3 SU				12	
	pH (maximum)	8.7 SU				12	

[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
110069711869	AL0080233	AM/NS Calvert LLC	DSN009

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		
Temperature	59.5 F				1	
Dissolved Oxygen	7.6 mg/L				1	
nitrogen, Ammonia Total	< 0.05 mg/L				1	
Nitrite Plus Nitrate, Total	< 0.025 mg/L				1	
Cyanide, Total	< 0.01 mg/L				1	
Cadmium, Total	< 2.5 ug/L				1	
Chromium, Total	0.0096 mg/L		< 0.0026 mg/L		12	
Copper, Total	10.1 ug/L				1	
Lead, Total	0.005 mg/L		< 0.0027 mg/L		12	
Nickel, Total	0.022 mg/L		< 0.019 mg/L		12	
Silver, Total	< 5 ug/L				1	
Zinc, Total	0.057 mg/L		< 0.02 mg/L		12	
Mercury	< 0.0001 mg/L		< 0.0000161 mg/L		12	
CBOD	< 3 mg/L				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
110069711869	AL0080233	AM/NS Calvert LLC	DSN009

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		
Bromide	< 0.5 mg/L				1	
Nitrate-nitrite	< 0.025 mg/L				1	
Oil and Grease	< 2.5 mg/L		< 2.5 mg/L		12	
Phosphorus, Total	< 0.05 mg/L				1	
Sulfate	4.0 mg/L				1	
Sulfite	0.64 mg/L				1	
Surfactants	< 0.1 mg/L				1	
Magnesium	7,880 ug/L				1	
Molybdenum	29.7 ug/L				1	
Manganese	198 ug/L				1	
Cadmium	< 2.5 ug/L				1	
Chromium	0.096 mg/L		< 0.0026 mg/L		12	
Copper	10.1 ug/L				1	
Lead	0.005 mg/L		< 0.0027 mg/L		12	
Nickel	0.022 mg/L		< 0.019 mg/L		12	
Silver	< 5 ug/L				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
110069711869	AL0080233	AM/NS Calvert LLC	DSN009

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)
12/17/2019	24	1.41	96	0.01 MGD	0.01 MGD

Provide a description of the method of flow measurement or estimate.

Rainfall runoff calculation using time of concentration, curve number, initial abstraction, and storm duration.

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110069711869	AL0080233	AM/NS Calvert LLC	DSN010

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	< 2.5 mg/L		< 2.5 mg/L		9	
2.	Biochemical oxygen demand (BOD_5)	< 1.5 mg/L				1	
3.	Chemical oxygen demand (COD)	27 mg/L		< 16 mg/L		9	
4.	Total suspended solids (TSS)	159 mg/L		60 mg/L		9	
5.	Total phosphorus	< 0.05 mg/L				1	
6.	Total Kjeldahl nitrogen (TKN)	0.733 mg/L				1	
7.	Total nitrogen (as N)	1.01 mg/L				1	
8.	pH (minimum)	7.3 SU				9	
	pH (maximum)	9.6 SU				9	

[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
110069711869	AL0080233	AM/NS Calvert LLC	DSN010

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		
Temperature	51.4 F				1	
Dissolved Oxygen	10.1 mg/L				1	
nitrogen, Ammonia Total	< 0.105 mg/L				1	
Nitrite Plus Nitrate, Total	0.279 mg/L				1	
Cyanide, Total	< 0.025 mg/L				1	
Cadmium, Total	< 0.0005 mg/L				1	
Chromium, Total	0.0464 mg/L		< 0.012 mg/L		9	
Copper, Total	0.00303				1	
Lead, Total	< 0.0025 mg/L		< 0.0022 mg/L		9	
Nickel, Total	< 0.02 mg/L		< 0.016 mg/L		9	
Silver, Total	< 0.005 mg/L				1	
Zinc, Total	0.0288 mg/L		< 0.01 mg/L		9	
Mercury	< 0.001 mg/L				1	
CBOD	< 1.5 mg/L				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
110069711869	AL0080233	AM/NS Calvert LLC	DSN010

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		
Bromide	< 0.25 mg/L				1	
Nitrate-nitrite	< 0.5 mg/L				1	
Oil and Grease	< 2.5 mg/L		< 2.5 mg/L		9	
Phosphorus, Total	< 0.05 mg/L				1	
Sulfate	5.74 mg/L				1	
Sulfite	0.64 mg/L				1	
Surfactants	< 0.04 mg/L				1	
Magnesium	4.14 mg/l				1	
Molybdenum	0.00487 mg/L				1	
Manganese	0.0089 mg/L				1	
Cadmium	< 0.005 mg/L				1	
Chromium	0.0464 mg/L		< 0.012 mg/L		9	
Copper	0.00303 mg/L				1	
Lead	< 0.0025 mg/L		< 0.0022 mg/L		9	
Nickel	< 0.02 mg/L		< 0.016 mg/L		9	
Silver	0.0005 mg/L				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
110069711869	AL0080233	AM/NS Calvert LLC	DSN010

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)
12/21/2019	24	1.24	96	0.23 MGD	0.23 MGD

Provide a description of the method of flow measurement or estimate.

Rainfall runoff calculation using time of concentration, curve number, initial abstraction, and storm duration.

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110069711869	AL0080233	AM/NS Calvert LLC	DSN011

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	< 2.5 mg/L		< 2.5 mg/L		4	DMR
2.	Biochemical oxygen demand (BOD_5)						
3.	Chemical oxygen demand (COD)	50 mg/L		39 mg/L		4	DMR
4.	Total suspended solids (TSS)	69.6 mg/L		35.6 mg/L		4	DMR
5.	Total phosphorus						
6.	Total Kjeldahl nitrogen (TKN)						
7.	Total nitrogen (as N)						
8.	pH (minimum)	7.5 SU				4	DMR
	pH (maximum)	8.75 SU				4	DMR

[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
110069711869	AL0080233	AM/NS Calvert LLC	DSN011

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		
Temperature						
Dissolved Oxygen						
Nitrogen, Ammonia Total						
Nitrite Plus Nitrate, Total						
Cyanide, Total						
Cadmium, Total						
Chromium, Total	0.011 mg/L		0.00599 mg/L		4	DMR
Copper, Total						
Lead, Total	< 0.00136 mg/L		< 0.00136 mg/L		4	DMR
Nickel, Total	< 0.0287 mg/L		< 0.0221 mg/L		4	DMR
Silver, Total						
Zinc, Total	< 0.00649mg/L		< 0.00362 mg/L		4	DMR
Mercury	< 0.010 mg/L		<0.00324		4	DMR
CBOD						

[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
110069711869	AL0080233	AM/NS Calvert LLC	DSN011

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		
Bromide						
Nitrate-nitrite						
Oil and Grease	< 2.5 mg/L		< 2.5 mg/L		4	DMR
Phosphorus, Total						
Sulfate						
Sulfite						
Surfactants						
Magnesium						
Molybdenum						
Manganese						
Cadmium						
Chromium	0.011 mg/L		0.00599 mg/L		4	DMR
Copper						
Lead	< 0.00136 mg/L		< 0.00136 mg/L		4	DMR
Nickel	< 0.0287 mg/L		< 0.0221 mg/L		4	DMR
Silver						

[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
110069711869	AL0080233	AM/NS Calvert LLC	DSN011

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.

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EPA Form 2F
Attachment A. AM/NS Calvert LLC Outfall Locations

Outfall Number	Receiving Water Name	Latitude	Longitude
DSN 002	Sheppard Lake	31 08' 59.11"	-87 58' 35.86"
DSN 003	Sheppard Lake	31 08' 53.76"	-87 58' 46.16"
DSN 004	Unnamed Tributary to Sheppard Lake	31 08' 16.42"	-87 58' 21.78"
DSN 007	Borrow Creek	31 07' 21.48"	-87 58' 22.10"
DSN 009	Tombigbee River	31 09' 12.28"	-87 58' 30.53"
DSN 010	Tombigbee River	31 09' 14.81"	-87 58' 29.95"
DSN 011	Dabney Creek	31 07' 34.54"	-88 0' 0.838"

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EPA Form 2F
Attachment B. AM/NS Calvert LLC Outfall Areas

Outfall Number	Impervious Surface Area (ft2)	Total Surface Area Drained (Acres)
DSN 002	3,988,696	268.73
DSN 003	3,988,696	268.73
DSN 004	4,720,300	534.03
DSN 007	648,500	298.9
DSN 009	251,000	10.08
DSN 010	127,000	3.63
DSN 011	2,238,898	13.75

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EPA Form 2F
Attachment C. AM/NS Calvert LLC Wastewater Sources

Outfall	Wastewater Sources
DSN002 & DSN003	Utility wastewaters including those listed below
	Condensates
	Non-contact cooling water
	Boiler blowdown
	Demineralizer blowdown/backwash water
	Equipment/vehicle rinse waters
	Fire suppression water
	Dust suppression water
	RO reject water
	Treated river water tank effluent/overflow
	Air separation unit (ASU) condensate, non-contact cooling water, and cleaning waters
	Stormwater associated with carbon steel manufacturing and processing
DSN004	Utility wastewaters including those listed below
	Air compressor condensate
	Boiler blowdown
	Demin blowdown/backwash water
	Equipment/vehicle rinse
	Fire suppression water
	Dust suppression water
	Non-contact cooling water
	Treated river water tank effluent/overflow
	Stormwater associated with Carbon Steel Manufacturing
DSN007	Stormwater associated with Carbon Steel Manufacturing including the Mold and Segment Shop
	Dust suppression water
DSN009 & DSN010	Stormwater associated with Carbon Steel Manufacturing including scrap and material handling, the Melt Shops, and the marine terminal
	Dust suppression water
DSN011	Storm water associated with Carbon Steel Manufacturing
	Dust suppression water

Note: DSN 002 and DSN 003 discharge from Pond 1. They are considered significantly similar outfalls. DSN002 is sampled and DSN 003 is not required to be sampled.

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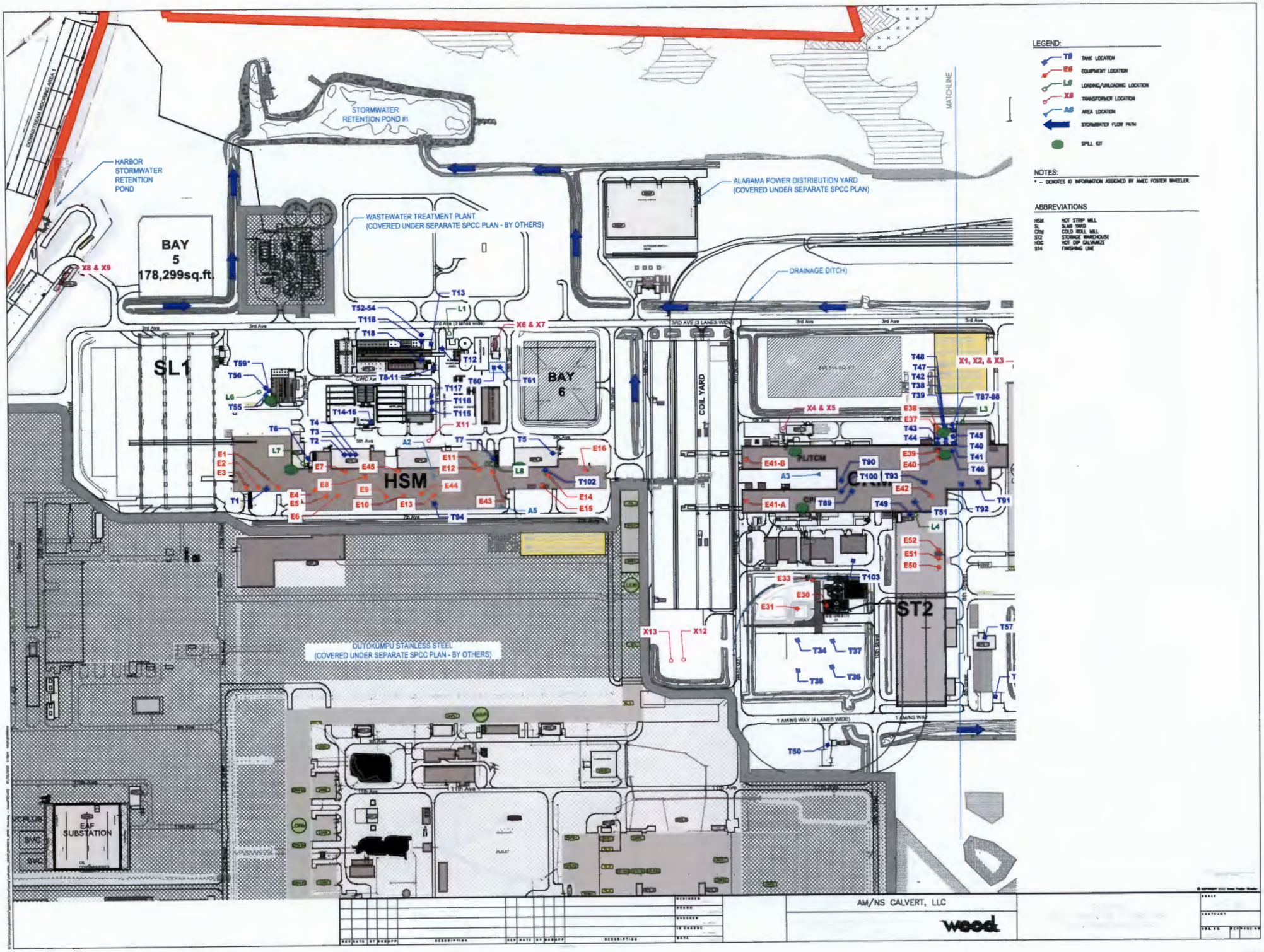
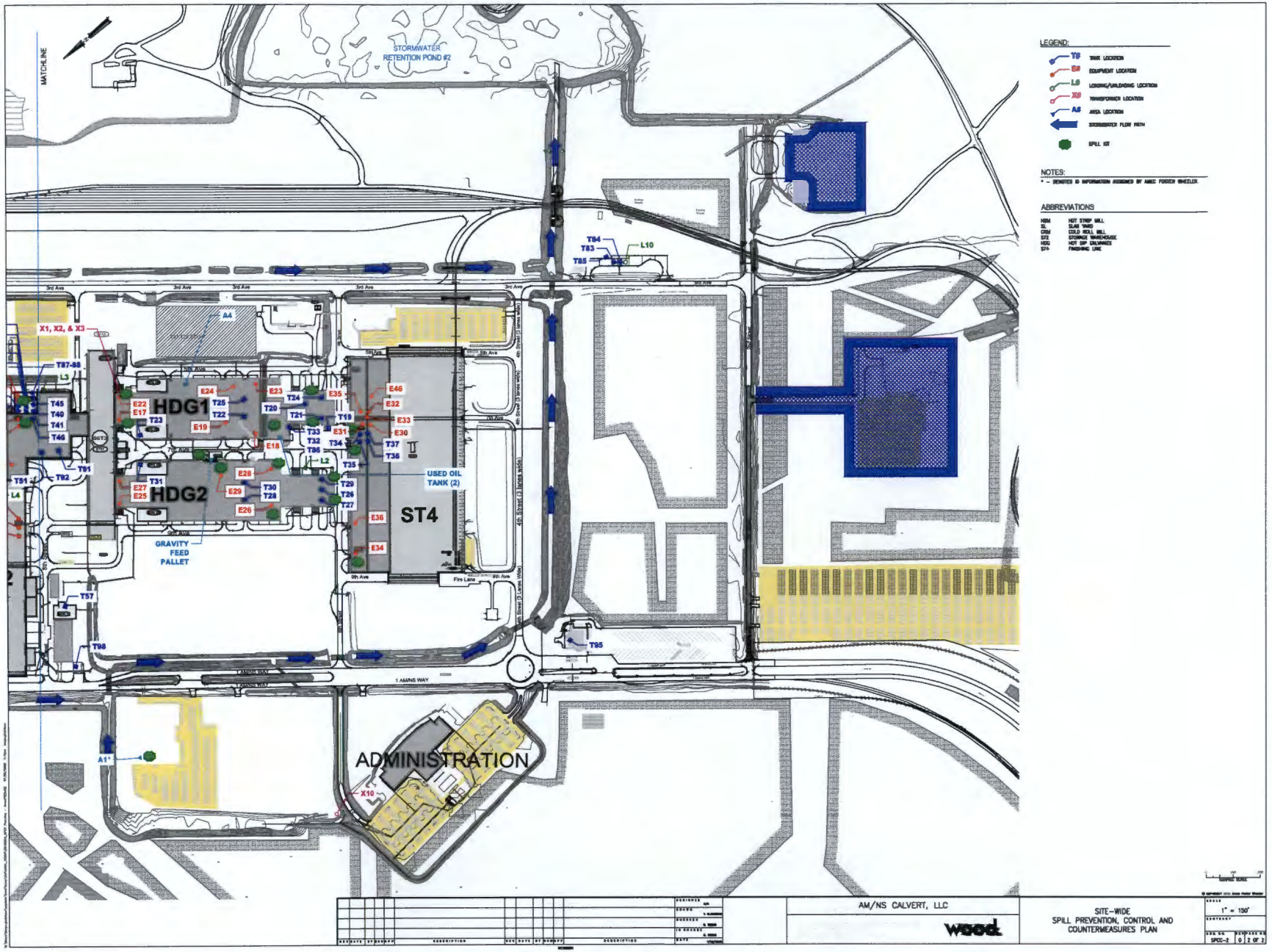

LEGEND:
TANK LOCATION
EQUIPMENT LOCATION
LOADING/UNLOADING LOCATION
TRANSFORMER LOCATION
AREA LOCATION
STORMWATER FLOW PATH
SPILL KIT
NOTES:
* – DENOTES ID INFORMATION ASSIGNED BY AMEC FOSTER WHEELER.
ABBREVIATIONS
HSM HOT STRIP MILL
SL SLAB YARD
CRM COLD ROLL MILL
ST2 STORAGE WAREHOUSE
HDG HOT DIP GALVANIZE
ST4 FINISHING LINE
STORMWATER RETENTION POND #1
HARBOR STORMWATER RETENTION POND
BAY 5 178,299sq.ft.
WASTEWATER TREATMENT PLANT (COVERED UNDER SEPARATE SPCC PLAN - BY OTHERS)
ALABAMA POWER DISTRIBUTION YARD (COVERED UNDER SEPARATE SPCC PLAN)
DRAINAGE DITCH)
MATCHLINE
SL1
BAY 6
HSM
COIL YARD
ST2
OUTOKUMPU STAINLESS STEEL (COVERED UNDER SEPARATE SPCC PLAN - BY OTHERS)
EAF SUBSTATION
AM/NS CALVERT, LLC
wood.



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