



Alabama Department of Environmental Management
adem.alabama.gov

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NOVEMBER 16, 2022 Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

CHAD MOORE, PLANT MANAGER
SOLUTIA, INC.
702 CLYDESDALE AVENUE
ANNISTON, AL 36201

RE: **DRAFT PERMIT**
 NPDES PERMIT NUMBER AL0001201

Dear Mr. Moore:

Transmitted herein is a draft of the referenced permit.

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

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

Our records indicate that 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 Rachel Lounsberry by e-mail at restanaland@adem.alabama.gov or by phone at (334) 279-3065.

Sincerely,

A handwritten signature in black ink, appearing to be "SR", written over the word "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





NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE: SOLUTIA INC

FACILITY: SOLUTIA INC
702 CLYDESDALE AVENUE
ANNISTON, ALABAMA 36201
CALHOUN COUNTY

PERMIT NUMBER: AL0001201

RECEIVING WATERS: 012 - UNNAMED TRIBUTARY TO CHOCCOLOCCO BRANCH

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

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:

Draft

Alabama Department of Environmental Management

**INDUSTRIAL SECTION
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT**

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PART I DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

DSN 012-Q Stormwater from the closed South Landfill, from the Therminol production area, biphenyl production area, MCC Warehouse, boiler areas, offices, laboratory, employee parking lot and satellite accumulation area.

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 DSN 012, 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 Freq	Sample Type	Seasonal
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
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
PCB-1016 (Arochlor 1016) (34671) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
PCB-1221 (Arochlor 1221) (39488) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
PCB-1232 (Arochlor 1232) (39492) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
PCB-1242 (Arochlor 1242) (39496) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
PCB-1248 (Arochlor 1248) (39500) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/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.

DSN 012-Q (Continued): Stormwater from the closed South Landfill, from the Therminol production area, biphenyl production area, MCC Warehouse, boiler areas, offices, laboratory, employee parking lot and satellite accumulation area.

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 DSN 012, 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 Freq	Sample Type	Seasonal
PCB-1254 (Arochlor 1254) (39504) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
PCB-1260 (Arochlor 1260) (39508) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Instantaneous	All Months
Solids, Total Dissolved (70295) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/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.

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

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 301(c), 301(g), 301(h), 301(k), or 316(a) of the FWPCA or for fundamentally different factors;
- (9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;
- (10) When required by the reopener conditions in this permit;
- (11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);
- (12) Upon failure of the state to notify, as required by Section 402(b)(3) of the FWPCA, another state whose waters may be affected by a discharge permitted by this permit;
- (13) When required to correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions: or

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

5. Permit Termination

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

- a. Violation of any term or condition of this permit;
- b. The permittee's misrepresentation or failure to disclose fully all relevant facts in the permit application or during the permit issuance process or the permittee's misrepresentation of any relevant facts at any time;
- c. Materially false or inaccurate statements or information in the permit application or the permit;
- d. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge;
- e. The permittee's discharge threatens human life or welfare or the maintenance of water quality standards;
- f. Permanent closure of the facility generating the wastewater permitted to be discharged by this permit or permanent cessation of wastewater discharge;
- g. New or revised requirements of any applicable standard or limitation that is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA that the Director determines cannot be complied with by the permittee; or
- h. Any other cause allowed by the ADEM Administrative Code, Chapter 335-6-6.

6. Permit Suspension

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

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

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

F. COMPLIANCE WITH TOXIC POLLUTANT STANDARD OR PROHIBITION

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

G. DISCHARGE OF WASTEWATER GENERATED BY OTHERS

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

PART III OTHER PERMIT CONDITIONS

A. CIVIL AND CRIMINAL LIABILITY

1. Tampering

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

2. False Statements

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

3. Permit Enforcement

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

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

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

(2) An action for damages;

(3) An action for injunctive relief; or

(4) An action for penalties.

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

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

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

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

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

4. Relief from Liability

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

B. OIL AND HAZARDOUS SUBSTANCE LIABILITY

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

C. PROPERTY AND OTHER RIGHTS

This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to persons or property or invasion of other private rights, trespass, or any infringement of federal, state, or local laws or regulations,

nor does it authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any waters of the state or of the United States.

D. AVAILABILITY OF REPORTS

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

E. EXPIRATION OF PERMITS FOR NEW OR INCREASED DISCHARGES

1. If this permit was issued for a new discharger or new source, this permit shall expire eighteen months after the issuance date if construction of the facility has not begun during the eighteen-month period.
2. If this permit was issued or modified to allow the discharge of increased quantities of pollutants to accommodate the modification of an existing facility and if construction of this modification has not begun during the eighteen month period after issuance of this permit or permit modification, this permit shall be modified to reduce the quantities of pollutants allowed to be discharged to those levels that would have been allowed if the modification of the facility had not been planned.
3. Construction has begun when the owner or operator has:
 - a. begun, or caused to begin as part of a continuous on-site construction program:
 - (1) any placement, assembly, or installation of facilities or equipment; or
 - (2) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment;
or
 - b. entered into a binding contractual obligation for the purpose of placement, assembly, or installation of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under the paragraph. The entering into a lease with the State of Alabama for exploration and production of hydrocarbons shall also be considered beginning construction.

F. COMPLIANCE WITH WATER QUALITY STANDARDS

1. On the basis of the permittee's application, plans, or other available information, the Department has determined that compliance with the terms and conditions of this permit should assure compliance with the applicable water quality standards.
2. Compliance with permit terms and conditions notwithstanding, if the permittee's discharge(s) from point sources identified in Provision I. A. of this permit cause or contribute to a condition in contravention of state water quality standards, the Department may require abatement action to be taken by the permittee in emergency situations or modify the permit pursuant to the Department's Rules, or both.
3. If the Department determines, on the basis of a notice provided pursuant to this permit or any investigation, inspection or sampling, that a modification of this permit is necessary to assure maintenance of water quality standards or compliance with other provisions of the AWPCA or FWPCA, the Department may require such modification and, in cases of emergency, the Director may prohibit the discharge until the permit has been modified.

G. GROUNDWATER

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

H. DEFINITIONS

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

- measured during that week (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).
3. Arithmetic Mean – means the summation of the individual values of any set of values divided by the number of individual values.
 4. AWPCA - means the Alabama Water Pollution Control Act.
 5. BOD – means the five-day measure of the pollutant parameter biochemical oxygen demand.
 6. Bypass - means the intentional diversion of waste streams from any portion of a treatment facility.
 7. CBOD – means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.
 8. Daily discharge - means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.
 9. Daily maximum - means the highest value of any individual sample result obtained during a day.
 10. Daily minimum - means the lowest value of any individual sample result obtained during a day.
 11. Day - means any consecutive 24-hour period.
 12. Department - means the Alabama Department of Environmental Management.
 13. Director - means the Director of the Department.
 14. Discharge - means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other wastes into waters of the state". Code of Alabama 1975, Section 22-22-1(b)(8).
 15. Discharge Monitoring Report (DMR) - means the form approved by the Director to accomplish reporting requirements of an NPDES permit.
 16. DO – means dissolved oxygen.
 17. 8HC – means 8-hour composite sample, including any of the following:
 - a. The mixing of at least 5 equal volume samples collected at constant time intervals of not more than 2 hours over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
 - b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
 18. EPA - means the United States Environmental Protection Agency.
 19. FC – means the pollutant parameter fecal coliform.
 20. Flow – means the total volume of discharge in a 24-hour period.
 21. FWPCA - means the Federal Water Pollution Control Act.
 22. Geometric Mean – means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).
 23. Grab Sample – means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.
 24. Indirect Discharger – means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.

25. Industrial User – means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category “Division D – Manufacturing” and such other classes of significant waste producers as, by regulation, the Director deems appropriate.
26. MGD – means million gallons per day.
27. Monthly Average – means, other than for fecal coliform bacteria, the arithmetic mean of the entire composite or grab samples taken for the daily discharges collected in one month period. The monthly average for fecal coliform bacteria is the geometric mean of daily discharge samples collected in a one month period. The monthly average for flow is the arithmetic mean of all flow measurements taken in a one month period.
28. New Discharger – means a person, owning or operating any building, structure, facility or installation:
 - a. from which there is or may be a discharge of pollutants;
 - b. that did not commence the discharge of pollutants prior to August 13, 1979, and which is not a new source; and
 - c. which has never received a final effective NPDES permit for dischargers at that site.
29. NH3-N – means the pollutant parameter ammonia, measured as nitrogen.
30. Permit application - means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.
31. Point source - means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, . . . from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. Section 1362(14).
32. Pollutant - includes for purposes of this permit, but is not limited to, those pollutants specified in Code of Alabama 1975, Section 22-22-1(b)(3) and those effluent characteristics specified in Provision I. A. of this permit.
33. Privately Owned Treatment Works – means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a “POTW”.
34. Publicly Owned Treatment Works – means a wastewater collection and treatment facility owned by the State, municipality, regional entity composed of two or more municipalities, or another entity created by the State or local authority for the purpose of collecting and treating municipal wastewater.
35. Receiving Stream – means the “waters” receiving a “discharge” from a “point source”.
36. Severe property damage - means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
37. Significant Source – means a source which discharges 0.025 MGD or more to a POTW or greater than five percent of the treatment work’s capacity, or a source which is a primary industry as defined by the U.S. EPA or which discharges a priority or toxic pollutant.
38. Solvent – means any virgin, used or spent organic solvent(s) identified in the F-Listed wastes (F001 through F005) specified in 40 CFR 261.31 that is used for the purpose of solubilizing other materials.
39. TKN – means the pollutant parameter Total Kjeldahl Nitrogen.
40. TON – means the pollutant parameter Total Organic Nitrogen.
41. TRC – means Total Residual Chlorine.
42. TSS – means the pollutant parameter Total Suspended Solids.
43. 24HC – means 24-hour composite sample, including any of the following:
 - a. the mixing of at least 12 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;

- b. a sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected; or
 - c. a sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.
44. Upset - means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
45. Waters - means "[a]ll waters of any river, stream, watercourse, pond, lake, coastal, ground or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely upon the property of a single individual, partnership or corporation unless such waters are used in interstate commerce." Code of Alabama 1975, Section 22-22-1(b)(2). Waters "include all navigable waters" as defined in Section 502(7) of the FWPCA, 22 U.S.C. Section 1362(7), which are within the State of Alabama.
46. Week - means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.
47. Weekly (7-day and calendar week) Average – is the arithmetic mean of all samples collected during a consecutive 7-day period or calendar week, whichever is applicable. The calendar week is defined as beginning on Sunday and ending on Saturday. Weekly averages shall be calculated for all calendar weeks with Saturdays in the month. If a calendar week overlaps two months (i.e., the Sunday is in one month and the Saturday in the following month), the weekly average calculated for the calendar week shall be included in the data for the month that contains the Saturday.

I. SEVERABILITY

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

PART IV ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS

A. BEST MANAGEMENT PRACTICES (BMP) PLAN REQUIREMENTS

1. BMP Plan

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

2. Plan Content

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

- a. Establish specific objectives for the control of pollutants:
 - (1) Each facility component or system shall be examined for its potential for causing a release of significant amounts of pollutants to waters of the State due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.
 - (2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g. precipitation), or circumstances to result in significant amounts of pollutants reaching surface waters, the plan should include a prediction of the direction, rate of flow, and total quantity of pollutants which could be discharged from the facility as a result of each condition or circumstance.
- b. Establish specific best management practices to meet the objectives identified under paragraph a. of this section, addressing each component or system capable of causing a release of significant amounts of pollutants to the waters of the State, and identifying specific preventative or remedial measures to be implemented;
- c. Establish a program to identify and repair leaking equipment items and damaged containment structures, which may contribute to contaminated stormwater runoff. This program must include regular visual inspections of equipment, containment structures and of the facility in general to ensure that the BMP is continually implemented and effective;
- d. Prevent the spillage or loss of fluids, oil, grease, gasoline, etc. from vehicle and equipment maintenance activities and thereby prevent the contamination of stormwater from these substances;
- e. Prevent or minimize stormwater contact with material stored on site;
- f. Designate by position or name the person or persons responsible for the day to day implementation of the BMP;
- g. Provide for routine inspections, on days during which the facility is manned, of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general to ensure that the BMP is continually implemented and effective;
- h. Provide for the use and disposal of any material used to absorb spilled fluids that could contaminate stormwater;
- i. Develop a solvent management plan, if solvents are used on site. The solvent management plan shall include as a minimum lists of the solvents on site; the disposal method of solvents used instead of dumping, such as reclamation, contract hauling; and the procedures for assuring that solvents do not routinely spill or leak into the stormwater;
- j. Provide for the disposal of all used oils, hydraulic fluids, solvent degreasing material, etc. in accordance with good management practices and any applicable state or federal regulations;

- k. Include a diagram of the facility showing the locations where stormwater exits the facility, the locations of any structure or other mechanisms intended to prevent pollution of stormwater or to remove pollutants from stormwater, the locations of any collection and handling systems;
- l. Provide control sufficient to prevent or control pollution of stormwater by soil particles to the degree required to maintain compliance with the water quality standard for turbidity applicable to the waterbody(s) receiving discharge(s) under this permit;
- m. Provide spill prevention, control, and/or management sufficient to prevent or minimize contaminated stormwater runoff. Any containment system used to implement this requirement shall be constructed of materials compatible with the substance(s) contained and shall prevent the contamination of groundwater. The containment system shall also be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided;
- n. Provide and maintain curbing, diking or other means of isolating process areas to the extent necessary to allow segregation and collection for treatment of contaminated stormwater from process areas;
- o. Be reviewed by plant engineering staff and the plant manager; and
- p. Bear the signature of the plant manager.

3. Compliance Schedule

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

4. Department Review

- a. When requested by the Director or his designee, the permittee shall make the BMP available for Department review.
- b. The Director or his designee may notify the permittee at any time that the BMP is deficient and require correction of the deficiency.
- c. The permittee shall correct any BMP deficiency identified by the Director or his designee within 30 days of receipt of notification and shall certify to the Department that the correction has been made and implemented.

5. Administrative Procedures

- a. A copy of the BMP shall be maintained at the facility and shall be available for inspection by representatives of the Department.
- b. A log of the routine inspection required above shall be maintained at the facility and shall be available for inspection by representatives of the Department. The log shall contain records of all inspections performed for the last three years and each entry shall be signed by the person performing the inspection.
- c. The permittee shall provide training for any personnel required to implement the BMP and shall retain documentation of such training at the facility. This documentation shall be available for inspection by representatives of the Department. Training shall be performed prior to the date that implementation of the BMP is required.
- d. BMP Plan Modification. The permittee shall amend the BMP plan whenever there is a change in the facility or change in operation of the facility which materially increases the potential for the ancillary activities to result in a discharge of significant amounts of pollutants.
- e. BMP Plan Review. The permittee shall complete a review and evaluation of the BMP plan at least once every three years from the date of preparation of the BMP plan. Documentation of the BMP Plan review and evaluation shall be signed and dated by the Plant Manager.

B. STORMWATER FLOW MEASUREMENT AND SAMPLING REQUIREMENTS

1. Stormwater Flow Measurement

- a. All stormwater samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches.
- b. The total volume of stormwater discharged for the event must be monitored, including the date and duration (in hours) and rainfall (in inches) for storm event(s) sampled. The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event must be a minimum of 72 hours. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.
- c. The volume may be measured using flow measuring devices, or estimated based on a modification of the Rational Method using total depth of rainfall, the size of the drainage area serving a stormwater outfall, and an estimate of the runoff coefficient of the drainage area. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

2. Stormwater Sampling

- a. A grab sample, if required by this permit, shall be taken during the first thirty minutes of the discharge (or as soon thereafter as practicable); and a flow-weighted composite sample, if required by this permit, shall be taken for the entire event or for the first three hours of the event.
- b. All test procedures will be in accordance with part I.B. of this permit.

ADEM PERMIT RATIONALE

PREPARED DATE: January 26, 2022

PREPARED BY: Rachel Lounsberry

Permittee Name: Solutia Inc
Facility Name: Solutia Inc
Permit Number: AL0001201

PERMIT IS REISSUANCE DUE TO EXPIRATION

DISCHARGE SERIAL NUMBERS & DESCRIPTIONS:

DSN012: Stormwater from the closed South Landfill, from the Therminol production area, biphenyl production area, MCC Warehouse, boiler areas, offices, laboratory, employee parking lot and satellite accumulation area.

INDUSTRIAL CATEGORY: NON-CATEGORICAL

MAJOR: No

STREAM INFORMATION:

Receiving Stream:	UT to Choccolocco Creek
Classification:	Fish and Wildlife
River Basin:	Coosa River Basin
7Q10:	0 cfs
7Q2:	0 cfs
1Q10:	0 cfs
Annual Average Flow:	0 cfs
303(d) List:	NO
Impairment:	_____
TMDL:	NO

DISCUSSION:

Solutia Inc is an organic chemicals manufacturer of polyphenol compounds including blending and packaging of phosphate, ester-based, non-flammable hydraulic liquids primarily used in aviation hydraulic systems. Solutia's process wastewater is discharged to the City of Anniston Choccolocco Creek WWTP through SID permit # IU 35-08-00048.

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

EPA has not promulgated specific guidelines for the discharges covered under the proposed permit. Proposed permit limits are based on Best Professional Judgment. The proposed frequencies are based on a review of site specific conditions and an evaluation of similar facilities.

012Q: Stormwater from the closed South Landfill, from the Therminol production area, biphenyl production area, MCC Warehouse, boiler areas, offices, laboratory, employee parking lot and satellite accumulation area.

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type	Seasonal	Basis
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months	BPJ
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
PCB-1016 (Arochlor 1016) (34671) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
PCB-1221 (Arochlor 1221) (39488) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
PCB-1232 (Arochlor 1232) (39492) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
PCB-1242 (Arochlor 1242) (39496) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
PCB-1248 (Arochlor 1248) (39500) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
PCB-1254 (Arochlor 1254) (39504) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
PCB-1260 (Arochlor 1260) (39508) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Instantaneous	All Months	BPJ
Solids, Total Dissolved (70295) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Chemical Oxygen Demand (COD) (2) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ

***Basis for Permit Limitation**

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

Discussion

Representative Outfall DSN012

Outfall DSN012 is considered representative of Outfall DSN001 and DSN007 through DSN012. This outfall drains a significant portion of the property. It should be noted that all other outfalls drain to DSN012, the only physical outfall associated with the site.

Best Professional Judgment (BPJ)

The parameters of concern for this facility are based on the parameters of concern listed in EPA form 2F and from the current permit. These parameters are consistent with similar facilities in the state and have been proven to be reflective of the operations at this facility. The parameters with specific limits are discussed below:

Oil & Grease

The daily maximum limit for Oil and Grease should prevent the occurrence of a visible sheen in the stream and has been shown to be achievable through the use of proper BMPs.

pH

pH will be monitored to detect any problems with the storm water runoff from contact with the material stored on site. pH is proposed to be monitored with no limits. The pH as the result of storm water is not expected to impact the receiving stream.

TSS, TDS, BOD, and COD

These parameters were in the previous permit and will continued to be monitored.

PCBs

It should be noted that PCBs are monitored to evaluate the effectiveness of corrective measures implemented under the facility's Resource Conservation and Recovery Act (RCRA) permit. Remedial actions continue at the site under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) at the direction of the EPA.

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



Solutia Inc. a subsidiary of Eastman
Chemical Company
702 Clydesdale Avenue
Anniston, AL 36201

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NOV 02 2021

INDUSTRIAL SECTION

October 28, 2021

Mr. Brian Marshall
Industrial Section, Water Division
Alabama Department of Environmental Management
1400 Coliseum Blvd.
Montgomery, AL 36110-2400

Re: Solutia, Inc. NPDES AL0001201 Permit Renewal

Dear Mr. Marshall:

Enclosed please find (2) signed copies of the National Pollutant Discharge Elimination System (NPDES_ permit renewal application for Solutia, Inc.'s Anniston, Alabama facility. A credit card will be used to pay the application fee for a minor industrial discharger permit reissuance in the amount of \$5,615.00.

We did not include analytical data for DSN012 in this initial packet. We have not been able to acquire samples from a significant rain event that meets all of the requirements for sampling. We will gather samples as soon as possible and submit the results.

Please do not hesitate to contact Andrew Wendt (Health, Safety, Environmental and Security Manager) or me at (256) 231-8400 if you have any questions or need additional information

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Moore".

Chad Moore
Plant Manager

cc: Mr. Andrew Wendt, Solutia, Inc.
Ms. E. Gayle Macolly, Solutia, Inc.

RECEIVED
NOV 02 2021
ADEM
FRONT DESK

NPDES PERMIT RENEWAL APPLICATION

Solutia, Inc.

Anniston, Alabama

NPDES Permit No. AL0001201

prepared by:

Solutia, Inc.
702 Clydesdale Avenue
Anniston, Alabama 36201

October 2021

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2. Description of Outfalls.....	2
3. Outfall Sampling Methodology and Results.....	3
4. Requested Permit Limits.....	4

TABLES

1. NPDES Stormwater Outfall Descriptions
2. Sampling Parameters
3. DSN012 Stormwater Sampling Results

APPENDICIES

- A. ADEM Form 187
- B. USEPA Form 1
- C. USEPA Form 2F

1.0 INTRODUCTION

Solutia, Inc., in Anniston, Alabama, is submitting its National Pollutant Discharge Elimination System (NPDES) permit application for renewal. Solutia Inc.'s current NPDES permit, AL0001201, expires on April 30, 2022.

Solutia, Inc. is an organic chemicals manufacturer of polyphenyl compounds and blends and packages phosphate ester-based, non-flammable hydraulic fluids at its facility located in Anniston, Calhoun County, Alabama. Polyphenyls produced include biphenyls, terphenyls and quarterphenyls that are used to make heat transfer fluids and plastic modifiers. The hydraulic fluids produced are primarily used in aviation hydraulic systems.

Solutia, Inc. does not have a direct process wastewater discharge through its NPDES permit. All process wastewater is pre-treated (equalization) prior to discharge at the Anniston Water Works and Sewer Board (AWWSB) Choccolocco Creek Wastewater Treatment Plant (CCWWTP) via discharge point DSN S011 and DSN S01S (Organic Chemicals, Plastics and Synthetic Fibers [OCPSF] hereinafter referred to as DSN002). This discharge is regulated by the Alabama Department of Environmental Management (ADEM) through State Indirect Discharge (SID) Permit No. IU350800048.

There are 12 stormwater outfalls located at the plant, only one of which is associated with industrial activities and currently regulated under the facility's NPDES permit, DSN012. Stormwater outfall DSN012 collects stormwater draining from the closed South Landfill (DSN007 through DSN011) and the active manufacturing areas at the plant (DSN001). Outfall DSN001 drains both stormwater and a limited amount of groundwater that expresses itself at the surface or infiltrates portions of the storm sewer system

Additional facility and stormwater discharge information is provided on ADEM Form 187 (Appendix A) and United States Environmental Protection Agency (USEPA) Form 1 (Appendix B).

2.0 DESCRIPTION OF OUTFALLS

Table 1 lists the stormwater outfalls at the Solutia, Inc. facility and shows both currently and formerly permitted outfalls. This table provides a description of the outfalls, the corresponding drainage basin acreage, USEPA form to be completed for the permit renewal application, and the rationale for the former elimination of certain outfalls from the NPDES permit.

Outfall DSN012 will be sampled for this NPDES permit renewal effort. This outfall drains a significant portion of the Solutia, Inc's property and is the final outfall from the facility serviced by outfalls DSN01 and DSN007 through DSN011. This outfall will be sampled and the results will be provided as Attachment C for USEPA Form 2F.

3.0 OUTFALL SAMPLING METHODOLOGY AND RESULTS

The analytical methods listed in Table 2 will be used in the analysis of the samples to be collected from outfall DSN012. Analytical results will be presented on USEPA Form 2F (Attachment C).

4.0 REQUESTED PERMIT LIMITS

Solutia, Inc. requests that monitoring requirements for outfall DSN012 remain unchanged as summarized below:

<u>Parameter (Units)</u>	<u>Limits</u>
Flow (MGD)	Monitor
pH (s.u.)	Monitor
BOD ₅ (mg/l)	Monitor
COD (mg/l)	Monitor
Oil and Grease (mg/l)	15
TDS (mg/l)	Monitor
TSS (mg/l)	Monitor
PCB 1016 (µg/l)	Monitor
PCB 1221 (µg/l)	Monitor
PCB 1232 (µg/l)	Monitor
PCB 1242 (µg/l)	Monitor
PCB 1248 (µg/l)	Monitor
PCB 1254 (µg/l)	Monitor
PCB 1260 (µg/l)	Monitor
Total PCBs (µg/l)	Monitor

MGD = Million Gallons per Day

s.u. = standard units

BOD₅ = Biochemical Oxygen Demand

COD = Chemical Oxygen Demand

TDS = Total Dissolved Solids

TSS = Total Suspended Solids

PCB = Polychlorinated Biphenyl

mg/l = milligrams per liter

µg/l = micrograms per liter

PCBs are monitored to evaluate the effectiveness of corrective measures implemented under the facility's Resource Conservation and Recovery Act (RCRA) permit (ALD004019048). As shown on Table 3, only low-level detections of PCBs were experienced during this permit renewal cycle. Monitoring only continues to be appropriate given that remedial actions continue to be implemented at the facility under the Comprehensive Environmental Response, Compensation, And Liability Act (CERCLA) at the direction of the EPA.

NPDES Permit Renewal Application
Solutia, Inc., Anniston, AL NPDES Permit No. AL0001201

Table 1

NPDES Stormwater Outfall Descriptions
Solutia, Inc. NPDES Permit Application

Outfall	Description of Sources	Acreage	2006 Sampling Required	EPA Form	Comments
DSN001	Stormwater associated with the Therminol production area, biphenyl production area, MCC warehouse, boiler area, offices, laboratory, employee parking lot, and satellite accumulation area.	15.5		N/A	Previously removed from permit; drains through DSN012.
DSN002	SID permit discharge of treated process wastewater to the Anniston Water Works and Sewer Board publicly owned treatment works.	N/A		N/A	Referred to as DSN S011 and DSN S01S (OCPSF) in SID Permit.
DSN003	Stormwater associated with the wastewater treatment area, Southeastern Regional warehouse, and closed biological wastewater treatment unit associated with former paranitrophenol production unit.	8.8		N/A	Previously removed from permit.
DSN004	Stormwater associated with Southeastern Regional Warehouse and closed paranitrophenol production area.	17.0		N/A	Previously removed from permit.
DSN005	Stormwater associated with closed paranitrophenol production area.	11.3		N/A	Previously removed from permit.
DSN006	Stormwater runoff from closed West End Landfill.	16.0		N/A	Previously removed from permit.
DSN007	Stormwater runoff from closed South Landfill.	11.0		N/A	Previously removed from permit; drains through DSN012.
DSN008	Stormwater runoff from closed South Landfill.	10.0		N/A	Previously removed from permit; drains through DSN012.
DSN009	Stormwater runoff from closed South Landfill.	11.9		N/A	Previously removed from permit; drains through DSN012.
DSN010	Stormwater runoff from closed South Landfill.	13.2		N/A	Previously removed from permit; drains through DSN012.
DSN011	Stormwater runoff from closed South Landfill.	17.3		N/A	Previously removed from permit; drains through DSN012.
DSN012	Stormwater runoff from the closed South Landfill (DSN007 through DSN011). Stormwater runoff from Therminol production area, biphenyl production area, MCC warehouse, boiler area, offices, laboratory, employee parking lot and satellite accumulation area (DSN001).	78.9		2F	This outfall is representative of all stormwater discharges associated with industrial-related activities and will be sampled for this permit renewal.
DSN013	Stormwater runoff from closed South Landfill	N/A		N/A	This outfall no longer exists due to re-routing through detention basin for discharge through DSN012.

Notes: N/A = Not Applicable
EPA = United States Environmental Protection Agency
SID = State Indirect Discharge
MCC = Monsanto Chemical Company

Table 2
 DSN012 Sampling Parameters
 Solutia, Inc. NPDES Permit Application

Parameter	Sample Type	Method (1)	Preservative	Holding Time
EPA Form 2F Requirements				
pH	Grab	EPA150.1	None	15 minutes
Oil and Grease	Grab	EPA1664	Sulfuric Acid to pH <2	28 days
BOD5	Grab/Composite	EPA405.1	None	48 hours
COD	Grab/Composite	EPA410.4	Sulfuric Acid to pH <2	28 days
TSS	Grab/Composite	EPA160.2	None	7 days
TKN	Grab/Composite	EPA351.3	Sulfuric Acid to pH <2	28 days
NO3+NO2-N	Grab/Composite	EPA353.2/.3	None	28 days
Total Phosphorus	Grab/Composite	EPA365.1	Sulfuric Acid to pH <2	28 days
Parameters Believed to be Present				
Iron	Grab/Composite	EPA236.1	Sulfuric Acid to pH <2	180 days
Manganese	Grab/Composite	EPA243.1	Sulfuric Acid to pH <2	180 days
Current NPDES Permit				
TDS	Grab/Composite	EPA160.1	None	7 days
PCB-1016	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze
PCB-1221	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze
PCB-1232	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze
PCB-1242	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze
PCB-1248	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze
PCB-1254	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze
PCB-1260	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze
Total PCBs	Grab/Composite	EPA608	None	7 days to extract, 40 days to analyze

Table 2

DSN012 Sampling Parameters
 Solutia, Inc. NPDES Permit Application

Parameter	Sample Type	Method (1)	Preservative	Holding Time
SID Parameters (Process Wastewater)				
OCPSF Parameters - Volatiles				
Benzene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Carbon Tetrachloride	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Chlorobenzene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Chloroethane	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Chloroform	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,2-Dichlorobenzene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,3-Dichlorobenzene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,4-Dichlorobenzene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,1-Dichloroethane	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,2-Dichloroethane	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,1-Dichloroethylene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,2-Trans-Dichloroethylene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,2-Dichloropropane	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,3-Dichloropropylene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Ethylbenzene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Methyl Chloride	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Methylene Chloride	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Tetrachloroethylene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Toluene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,1,1-Trichloroethane	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
1,1,2-Trichloroethane	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Trichloroethylene	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days
Vinyl Chloride	Grab/Composite	EPA624	Hydrochloric Acid to pH <2	14 days

Table 2
 DSN012 Sampling Parameters
 Solutia, Inc. NPDES Permit Application

Parameter	Sample Type	Method (1)	Preservative	Holding Time
OCPSF Parameters - Semi-Volatiles				
Acenaphthene	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Anthracene	Grab/Composite	EPA625	Sulfuric Acid to pH <2	7 days to extract, 40 days to analyze
Bis(2-ethylhexyl)phthalate	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Di-n-butylphthalate	Grab/Composite	EPA625	Sulfuric Acid to pH <2	7 days to extract, 40 days to analyze
Diethylphthalate	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Dimethylphthalate	Grab/Composite	EPA625	Sulfuric Acid to pH <2	7 days to extract, 40 days to analyze
4,6-Dinitro-o-cresol	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Fluoranthene	Grab/Composite	EPA625	Sulfuric Acid to pH <2	7 days to extract, 40 days to analyze
Fuorene	Grab/Composite	EPA625	Sulfuric Acid to pH <1	7 days to extract, 40 days to analyze
Hexachlorobenzene	Grab/Composite	EPA625	Sulfuric Acid to pH <2	7 days to extract, 40 days to analyze
Hexachlorobutadiene	Grab/Composite	EPA625	Sulfuric Acid to pH <2	7 days to extract, 40 days to analyze
Hexachlorobutadiene	Grab/Composite	EPA625	Sulfuric Acid to pH <3	7 days to extract, 40 days to analyze
Hexachlorobutadiene	Grab/Composite	EPA625	Sulfuric Acid to pH <4	7 days to extract, 40 days to analyze
Hexachloroethane	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Napthalene	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Nitrobenzene	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
2-Nitrophenol	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
4-Nitrophenol	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Phenanthrene	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
Pyrene	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
1,2,4-Trichlorobenzene	Grab/Composite	EPA625	None	7 days to extract, 40 days to analyze
OCPSF Parameters - Metals/Inorganics				
Total Cyanide	Grab/Composite	EPA335.2	Sodium Hydroxide to pH>12	14 days
Total Recoverable Lead	Grab/Composite	EPA200.7	Nitric Acid to pH <2	180 days
Total Zinc	Grab/Composite	EPA200.7	Nitric Acid to pH <2	180 days

Table 2
DSN012 Sampling Parameters
Solutia, Inc. NPDES Permit Application

Parameter	Sample Type	Method (1)	Preservative	Holding Time
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Notes:

1. Analytical Methods and Detection Limits must conform to NPDES requirements (40 CFR 136)

BOD₅ = Biochemical Oxygen Demand

COD = Chemical Oxygen Demand

TSS = Total Suspended Solids

TKN = Total Kjeldahl Nitrogen

NO₃+NO₂-N = Nitrate plus Nitrite Nitrogen, as Nitrogen

TDS = Total Dissolved Solids

PCB = Polychlorinated Biphenyl

OCPSF = Organic Chemicals, Plastics and Synthetic Fibers

SID = State Indirect Discharge

Solutia, Inc. NPDES Permit Application+N1:235
DSN012 Quarterly Sampling Results
Solutia, Inc. NPDES Permit Application

Parameter (Units)	Limits	Q3 2016	Q4 2016	Q1 2017	Q2 2017	Q3/2017	Q4 2017	Q1 2018	Q2 2018	Q3 2018	Q4 2018	Q1 2019	Q2 2019	Q3 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021
Flow (MGD)	Monitor	No DI	0.45	0.9	1	7	0.427	0.65	2.5	No DI	2.5	12	4	E	6	0.9	0.25	0.2	E	0.2	0.228	0.2
pH (s.u.)	Monitor	No DI	7.12	7.28	7.28	7.23	7.16	6.97	7.37	No DI	7.1	7.34	6.97	E	7.15	6.73	6.97	6.84	E	6.84	6.77	6.54
BOD ₅ (mg/l)	Monitor	No DI	19	5.3	4.1	8.9	8.8	3.7	16	No DI	6	BDL	5	E	BDL	BDL	8	BDL	E	BDL	BDL	BDL
COD (mg/l)	Monitor	No DI	11	16	28	20	31	20	76	No DI	20.1	BDL	16.8	E	15.4	BDL	88.9	8	E	16.8	BDL	BDL
Oil and Grease (mg/l)	15	No DI	BDL	BDL	BDL	BDL	BDL	BDL	BDL	No DI	BDL	BDL	BDL	E	BDL	1.4	16	BDL	E	BDL	BDL	BDL
TDS (mg/l)	Monitor	No DI	270	130	44	39	76	48	92.9	No DI	49	82	138	E	38.6	104	49.3	125	E	52	119	134
TSS (mg/l)	Monitor	No DI	4.7	33	98	31	170	44	144	No DI	115	82	38	E	138	5	91	8	E	17	21	BDL
PCB 1016 (µg/l)	Monitor	No DI	BDL	BDL	BDL	BDL	BDL	BDL	BDL	No DI	BDL	BDL	BDL	E	BDL	BDL	BDL	BDL	E	BDL	BDL	BDL
PCB 1221 (µg/l)	Monitor	No DI	BDL	BDL	BDL	BDL	BDL	BDL	BDL	No DI	BDL	BDL	BDL	E	BDL	BDL	BDL	BDL	E	BDL	BDL	BDL
PCB 1232 (µg/l)	Monitor	No DI	BDL	BDL	BDL	BDL	BDL	BDL	BDL	No DI	BDL	BDL	BDL	E	BDL	BDL	BDL	BDL	E	BDL	BDL	BDL
PCB 1242 (µg/l)	Monitor	No DI	BDL	BDL	3.4	BDL	BDL	BDL	11.3	No DI	4.06	1.95	6.61	E	3.88	BDL	BDL	BDL	E	3.1	6.96	1.98
PCB 1248 (µg/l)	Monitor	No DI	3.4	2.9	BDL	BDL	2.5	1.6	BDL	No DI	BDL	BDL	BDL	E	BDL	BDL	BDL	BDL	E	BDL	BDL	BDL
PCB 1254 (µg/l)	Monitor	No DI	BDL	BDL	BDL	47	BDL	BDL	BDL	No DI	2.51	BDL	BDL	E	BDL	BDL	1.14	0.752	E	BDL	BDL	BDL
PCB 1260 (µg/l)	Monitor	No DI	BDL	BDL	1.8	31	BDL	BDL	6.29	No DI	BDL	0.35	BDL	E	1.57	BDL	BDL	BDL	E	0.408	1.71	0.415
Total PCBs (µg/l)	Monitor	No DI	3.4	2.9	5.2	78	2.5	1.6	17.59	No DI	6.57	2.3	6.61	E	6.45	BDL	1.14	0.752	E	3.508	8.67	2.4

Notes:

No DI = No discharge Rainfall amount did not meet criteria for a qualifying event

Q = Quarter

P - the %RPD between the primary and confirmation column/detector is >40%. The lower value has been reported.

E = No sampling completed for designated sample timeframe.

BDL = Below Detection Limit

MGD = Million Gallons per Day

s.u. = standard units

mg/l = milligrams per liter

µg/l = micrograms per liter

TDS = Total Dissolved Solids

TSS = Total Suspended Solids

PCB = Polychlorinated Biphenyl

APPENDIX A
ADEM FORM 187

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

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

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

RECEIVED

NOV 02 2021

PURPOSE OF THIS APPLICATION

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

- Initial Permit Application for Existing Facility*
 Reissuance of Existing Permit

INDUSTRIAL SECTION

* 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: Solutia, Inc.
2. NPDES Permit Number: AL_0001201 (not applicable if initial permit application)
3. SID Permit Number (if applicable): IU_350800048
4. NPDES General Permit Number (if applicable): ALG
5. Facility Location (Front Gate): Latitude: 33.65117257533583 Longitude: -85.85371255874634
6. Responsible Official (as described on the last page of this application):
Name: Chad Moore Title: Plant Manager
Address: 702 Clydesdale Avenue
City: Anniston State: AL Zip: 36201
Phone Number: 256-231-8526 Email Address: cmoore@eastman.com
7. Designated Discharge Monitoring Report (DMR) Contact:
Name: Andrew Wendt Title: HSES Manager
Phone Number: 256-231-8509 Email Address: andrewd.wendt@eastman.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: Incorporated in Delaware as Eastman Chemical Company at 200 South Wilcox Drive
City: Kingsport County: Sullivan, Hawkins, Wash. State: TN Zip: 37660
- b) Parent Corporation of Applicant:
Name: Eastman Chemical Company
Address: 200 South Wilcox Drive
City: Kingsport State: TN Zip: 37660

c) Subsidiary Corporation(s) of Applicant:

Name: Solutia Inc.

Address: 575 Maryville Centre Drive

City: St. Louis State: MO Zip: 63141

d) Corporate Officers:

Name: Kelly Walker, Senior Vice President

Address: 200 South Wilcox Drive

City: Kingsport State: TN Zip: 37660

Name: David A. Woodmansee, Director

Address: 200 South Wilcox Drive

City: Kingsport State: TN Zip: 37660

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

Name: Corporation Service Company

Address: 2711 Centerville Road, Suite 400

City: Wilmington State: Delaware 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):

<u>Facility Name</u>	<u>Permit Number</u>	<u>Type of Action</u>	<u>Date of Action</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

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

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

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?
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

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

Current:	Flow Metering	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
	Sampling Equipment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Planned:	Flow Metering	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
	Sampling Equipment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> 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:

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:

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

Trade Name	Chemical Composition
See Attachment 1	

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):

- | | |
|-----------------------------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Private Well | <input type="checkbox"/> Surface Water |
| <input checked="" type="checkbox"/> Municipal Water Utility (Specify City): | <input type="checkbox"/> Other (Specify): <u>City of Anniston</u> |

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

City: 0.460 MGD* Well: _____ MGD* Well Depth: _____ Ft. Latitude: _____ Longitude: _____

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

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

Name of Surface Water Source: _____

* MGD – Million Gallons per Day

Cooling Water Intake Structure Information

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

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

a) Name of Provider: _____ b) Location of Provider: _____

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

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

3. Is any water withdrawn from the source water used for cooling? Yes No
4. Using the average monthly measurements over any 12-month period, approximately what percentage of water withdrawn is used exclusively for cooling purposes? _____%
5. Does the cooling water consist of treated effluent that would otherwise be discharged? Yes No
(If yes, go to Section E, if no, complete D.6 – D.17)
6. a. Is the cooling water used in a once-through cooling system? Yes No
b. Is the cooling water used in a closed cycle cooling system? Yes No
7. When was the intake installed? _____
(Please provide dates for all major construction/installation of intake components including screens)
8. What is the maximum intake volume? _____
(maximum pumping capacity in gallons per day)
9. What is the average intake volume? _____
(average intake pump rate in gallons per day average in any 30-day period)
10. What is the actual intake flow (AIF) as defined in 40 CFR §125.92(a)? _____ MGD
11. How is the intake operated? (e.g., continuously, intermittently, batch) _____
12. What is the mesh size of the screen on your intake? _____
13. What is the intake screen flow-through area? _____
14. What is the through-screen design intake flow velocity? _____ ft/sec
15. What is the through-screen actual velocity (in ft/sec)? _____ ft/sec
16. What is the mechanism for cleaning the screen? (e.g., does it rotate for cleaning) _____
17. Do you have any additional fish detraction technology on your intake? Yes No
18. Have there been any studies to determine the impact of the intake on aquatic organisms? Yes No (If yes, please provide.)
19. Attach a site map showing the location of the water intake in relation to the facility, shoreline, water depth, etc.

SECTION E – WASTE STORAGE AND DISPOSAL INFORMATION

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

Description of Waste	Description of Storage Location
See Attachment 2	

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? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Will the project be a source of new air emissions? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Does the project involve dredging and/or filling of a wetland area or water way? | <input type="checkbox"/> | <input type="checkbox"/> |
| If Yes, has the Corps of Engineers (COE) permit been received? | <input type="checkbox"/> | <input type="checkbox"/> |
| COE Project No. _____ | | |
| 4. Does the project involve wetlands and/or submersed grassbeds? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Are oyster reefs located near the project site? | <input type="checkbox"/> | <input type="checkbox"/> |
| 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)? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Does the project involve mitigation of shoreline or coastal area erosion?..... | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Does the project involve construction on beaches or dune areas?..... | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Will the project interfere with public access to coastal waters?..... | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Does the project lie within the 100-year floodplain?..... | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Does the project involve the registration, sale, use, or application of pesticides?..... | <input type="checkbox"/> | <input type="checkbox"/> |
| 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)?..... | <input type="checkbox"/> | <input type="checkbox"/> |
| If yes, has the applicable permit for groundwater recovery or for groundwater well installation been obtained? | <input type="checkbox"/> | <input type="checkbox"/> |

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.

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

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

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

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

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

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

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

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

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

SECTION H – EPA Application Forms

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

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

SECTION I – ENGINEERING REPORT/BMP PLAN REQUIREMENTS

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

SECTION J- RECEIVING WATERS

Outfall No.	Receiving Water(s)	303(d) Segment?		Included in TMDL?*	
	Unnamed Tributary to Snow Creek	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> 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: Chad Moore Date Signed: 10/28/2021

Name: Chad Moore Title: Plant Manager (Signatory Authorization attached)

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

Mailing Address: 702 Clydesdale Avenue

City: Anniston State: AL Zip: 36201

Phone Number: 256-231-8526 Email Address: chadmoore@eastman.com

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.



Table A-1

Additional Permits held by Applicant

Solutia, Inc. NPDES Permit Application

I. RCRA Permit

AHWMMA Post-Closure Permit Issuance

USEPA ID Num

II. Air Permits

Permit Number	Description of Source	Date Issued
301-0007-X011	Santotar Storage Tank (22,000 Gallons)	1/21/1998
301-0007-X012	Two (2) 25,000 Gallon Tanks for Storage of Therminol 66J and Returned Therminol 66	1/21/1998
301-0007-X013	Benzene Storage System with Two 60,000 Gallon Horizontal Tanks, and One 11,800 Gallon Benzene Feed Tank Vented to Boiler with Carbon Cannisters as Backup	1/21/1998
301-0007-X014	60,000 Gallon General VOC Storage Tank Vented to Boiler with Carbon Cannisters as Backup	12/12/1997
301-0007-X017	24,400 Gallon Fixed Roof Therminol Storage Tank (#721)	1/21/1998
301-0007-X018	31,800 Gallon Fixed Roof Storage Tank for the Storage of VOCs with Maximum True Vapor Pressures less than 2.17 psia (Tank #741)	1/21/1998
301-0007-X019	24,400 Gallon Fixed Roof Storage Tank for the Storage of VOCs with Maximum True Vapor Pressures less than 2.17 psia (Tank #751)	1/21/1998
301-0007-X020	31,800 Gallon Fixed Roof Diphenyl Oxide Storage Tank (#730)	1/21/1998
301-0007-X021	50,000 Gallon Storage Tank for General VOCs with Vapor Pressures less than 0.51 psia	2/5/1998
301-0007-X022	12,000 Gallon Fixed Roof Storage Tank for Returned Therminol-66 (Tank No. VE0119)	2/10/2000
301-0007-X024	40 MMBtu/hr Natural Gas and Used Oil Fired Process Steam Boiler	5/19/2020
301-0007-Z002	Polyphenyl Manufacturing Process (with Hydrogen-Benzene Flare) and Associated Equipment Including Polyethylbenzene By-Product Distillation	1/21/1998

ATTACHMENT 1
BIOCIDE AND CORROSION INHIBITOR DATA

ChemTreat Biocide Information

Product Name: ChemTreat C-2189T

Chemical Composition (see below):

1-Bromo-3-Chloro-5,5-Dimethylhydantoin (96 wt.%)

Binding agents such as water and salts (2-6 wt.%)

96-hour aquatic toxicity information: Refer to Section 12 of the attached SDS.

Quantity Used: 500 lbs/year

Frequency of Use: Continuous

Proposed Discharge Concentrations: None to stormwater discharge associated with NPDES permit.

EPA Registration Number: 83451-4-15300

ChemTreat Corrosion Inhibitor Information

Product Name: Quadrasperse CL5852

Chemical Composition (see below):

1-Hydroxyethylidene-1,1-diphosphoric acid, disodium salt (1-5 wt.%)

Sodium phosphate, monobasic (3-7 wt.%)

Organic/inorganic salts (3-7 wt.%)

Acrylic polymer (10-30 wt.%)

Water (balance)

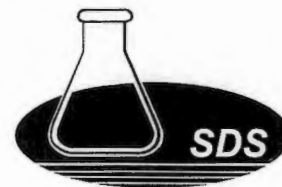
96-hour aquatic toxicity information: Refer to Section 12 of the attached SDS.

Quantity Used: 32,000 lbs/year

Frequency of Use: Continuous

Proposed Discharge Concentrations: None to stormwater discharge associated with NPDES permit.

EPA Registration Number: N/A



SAFETY DATA SHEET

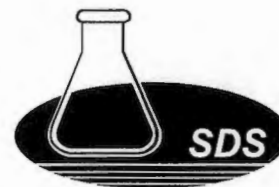
Section 1. Chemical Product and Company Identification

Product Name:	ChemTreat C2189T
Product Use:	Cooling Water Microbiocide
Supplier's Name:	ChemTreat, Inc.
Emergency Telephone Number:	(800)424-9300 (Toll Free)
Address (Corporate Headquarters):	5640 Cox Road Glen Allen, VA 23060
Telephone Number for Information:	(800)648-4579
Date of SDS:	January 12, 2017
Revision Date:	January 12, 2017
Revision Number:	17011201AN

Section 2. Hazard(s) Identification



Signal Word:	DANGER
GHS Classification(s):	Skin corrosion/irritation – Category 1b Eye damage/irritation – Category 1 Acute Toxicity Dermal – Category 4 Acute Toxicity Inhalation – Category 4 Acute Toxicity Oral – Category 4 Hazardous to the aquatic environment Acute – Category 2 Oxidizing Solids – Category 3
Hazard Statement(s):	H314 Causes severe skin burns and eye damage. H318 Causes serious eye damage. H312 Harmful in contact with skin. H332 Harmful if inhaled. H302 Harmful if swallowed. H401 Toxic to aquatic life. H272 May intensify fire; oxidizer.
Precautionary Statement(s):	



Prevention:

P260 Do not breathe dust/fume/gas/mist/vapors/spray.
P264 Wash thoroughly after handling.
P270 Do not eat, drink, or smoke when using this product.
P271 Use only outdoors or in a well-ventilated area.
P280 Wear protective gloves/protective clothing/eye protection/face protection.
P273 Avoid release into the environment.
P210 Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
P220 Keep away from clothing and other combustible materials.

Response:

P301 + P312 IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
P301 + 330 + 331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
P303 + P361 + P353 IF ON SKIN (or hair): Remove/take off immediately all contaminated clothing. Rinse skin with water/shower
P304 + P340 IF INHALED: Remove person to fresh air and keep comfortable for breathing
P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
P310 Immediately call a POISON CENTER/doctor.
P363 Wash contaminated clothing before reuse.
P370 + P378 In case of fire: Use extinguishing media suitable to surrounding fire to extinguish.

Storage:

P405 Store locked up.

Disposal:

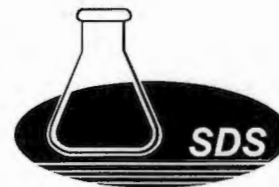
P501 Dispose of contents and container in accordance with applicable local, regional, national, and/or international regulations.

System of Classification Used:

Classification under 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

Hazards Not Otherwise Classified:

None.



Section 3. Composition/Hazardous Ingredients

1-Bromo-3-chloro-5,5-dimethylhydantoin	16079-88-2	96
----------------------------------------	------------	----

Comments If chemical identity and/or exact percentage of composition has been withheld, this information is considered to be a trade secret.

Section 4. First Aid Measures

Inhalation: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a poison center or doctor/physician.

Eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a poison center or doctor/physician.

Skin: Immediately remove/take off all contaminated clothing. Rinse skin with water/shower. Wash contaminated clothing before re-use. Immediately call a poison center or doctor/physician.

Ingestion: DO NOT INDUCE VOMITING. Rinse mouth. Call a POISON CENTER or doctor/physician.

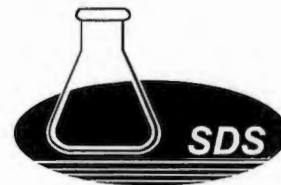
Most Important Symptoms: N/D

Indication of Immediate Medical Attention and Special Treatment Needed, If Necessary: Probable mucosal damage may contraindicate the use of gastric lavage.

Section 5. Fire Fighting Measures

Flammability of the Product: Product is an oxidizer. Oxidizers may increase the intensity of a fire.

Suitable Extinguishing Media: Use extinguishing media suitable to surrounding fire. Do not use ammonium phosphate dry chemical.



Specific Hazards Arising from the Chemical:

None known.

Protective Equipment:

If product is involved in a fire, wear full protective clothing including a positive-pressure, NIOSH approved, self-contained breathing apparatus.

Section 6. Accidental Release Measures

Personal Precautions:

Use appropriate Personal Protective Equipment (PPE).

Environmental Precautions:

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit, and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Methods for Cleaning up:

Carefully shovel or sweep up spilled material and place in suitable container.
Avoid generating dust.

Other Statements:

None.

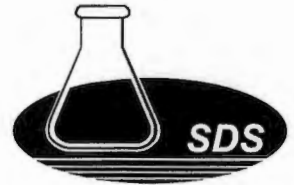
Section 7. Handling and Storage

Handling:

Wear appropriate Personal Protective Equipment (PPE) when handling this product. Do not get in eyes, or on skin and clothing. Wash thoroughly after handling. Do not ingest. Avoid breathing vapors, mist or dust.

Storage:

Store away from incompatible materials (see Section 10). Store at ambient temperatures. Keep container securely closed when not in use. Label precautions also apply to empty container. Recondition or dispose of empty containers in accordance with government regulations. For Industrial use only.
Store in dry place.
Protect from heat and sources of ignition.



Section 8. Exposure Controls/Personal Protection

Exposure Limits

	Source	Exposure Limits
1-Bromo-3-chloro-5,5-dimethylhydantoin	N/E	N/E

Engineering Controls:

Use only with adequate ventilation. The use of local ventilation is recommended to control emission near the source.

Personal Protection

Eyes:

Wear chemical splash goggles or safety glasses with full-face shield. Maintain eyewash fountain in work area.

Skin:

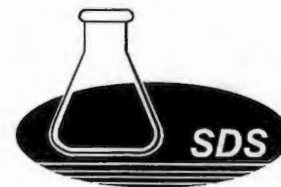
Maintain quick-drench facilities in work area. Wear butyl rubber or neoprene gloves. Wash them after each use and replace as necessary. If conditions warrant, wear protective clothing such as boots, aprons, and coveralls to prevent skin contact.

Respiratory:

If dust is present during handling, wear a dust mask.

Section 9. Physical and Chemical Properties

Physical State and Appearance:	Tableted Solid, White, Opaque
Specific Gravity:	N/A
pH:	4.2 @ 20°C, 0.1%
Freezing Point:	N/A
Flash Point:	N/D
Odor:	Mild
Melting Point:	293 - 302°F
Initial Boiling Point and Boiling Range:	N/D
Solubility in Water:	Soluble
Evaporation Rate:	N/D
Vapor Density:	N/D
Molecular Weight:	N/D
Viscosity:	N/A
Flammability (solid, gas):	N/D
Flammable Limits:	N/A
Autoignition Temperature:	N/A
Density:	0.00 LB/GA
Vapor Pressure:	N/D
% VOC:	0



Odor Threshold N/D
n-octanol Partition Coefficient N/D
Decomposition Temperature N/D

Section 10. Stability and Reactivity

Chemical Stability: Stable at normal temperatures and pressures.

Incompatibility with Various Substances: Reducing agents, Strong bases, Ammonia.

Hazardous Decomposition Products: Hydrogen bromide, Hydrogen chloride, Bromine, Chlorine, Oxides of carbon, Oxides of nitrogen.

Possibility of Hazardous Reactions: None known.

Reactivity: N/D

Conditions To Avoid: N/D

Section 11. Toxicological Information

Acute Toxicity

Chemical Name	Exposure	Type of Effect	Concentration	Species
ChemTreat C2189T	Oral	LD50	578 MG/KG	Rat
	Dermal	LD50	2000 MG/KG	Rabbit

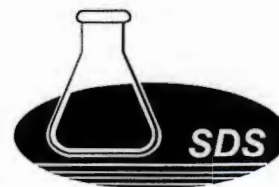
Carcinogenicity Category

Chemical Name	Source	Code	Brief Description
1-Bromo-3-chloro-5,5-dimethylhydantoin	N/E	N/E	N/E

Likely Routes of Exposure: N/D

Symptoms

Inhalation: N/D
Eye Contact: N/D
Skin Contact: N/D
Ingestion: N/D



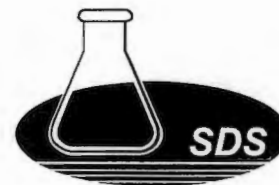
Skin Corrosion/Irritation: N/D
Serious Eye Damage/Eye Irritation: N/D
Sensitization: N/D
Germ Cell Mutagenicity: N/D
Reproductive/Developmental Toxicity: N/D
Specific Target Organ Toxicity
Single Exposure: N/D
Repeated Exposure: N/D
Aspiration Hazard: N/D
Comments: None.

Section 12. Ecological Information

Ecotoxicity

Species	Duration	Type of Effect	Test Results
Fathead Minnow	96h	LC50	2.25 mg/l
Rainbow Trout	96h	LC50	0.87 mg/l
Daphnia magna	48h	LC50	0.46 mg/l
Sheepshead Minnow	96h	LC50	20 mg/l
Ceriodaphnia dubia	48h	LC50	1.593 mg/l
Mysid Shrimp	24h	LC50	3.3 mg/l
	48h	LC50	2.1 mg/l
Inland Silverside	24h	LC50	1.8 mg/l
	96h	LC50	1.8 mg/l

Persistence and Biodegradability: N/D
Bioaccumulative Potential: N/D
Mobility In Soil: N/D
Other Adverse Effects: N/D
Comments: None.



Section 13. Disposal Considerations

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities. EPA ignitibility characteristic hazardous waste D001 when disposed of in the original product form.

Section 14. Transport Information

Controlling Regulation	UN/NA#:	Proper Shipping Name:	Technical Name:	Hazard Class:	Packing Group:
DOT	UN3085	OXIDIZING SOLID, CORROSIVE, N.O.S.	(CONTAINS BROMO-CHLORO- DIMETHYLHYDANTOIN)	5.1, 8	PGIII
ICAO	UN3085	OXIDIZING SOLID, CORROSIVE, N.O.S.	(CONTAINS BROMO-CHLORO- DIMETHYLHYDANTOIN)	5.1, 8	PGIII
TDG	UN3085	OXIDIZING SOLID, CORROSIVE, N.O.S.	(CONTAINS BROMO-CHLORO- DIMETHYLHYDANTOIN)	5.1, 8	PGIII
IMDG	UN3085	OXIDIZING SOLID, CORROSIVE, N.O.S.	(CONTAINS BROMO-CHLORO- DIMETHYLHYDANTOIN)	5.1, 8	PGIII

Note: Marine Pollutant

Section 15. Regulatory Information

Inventory Status

United States (TSCA):
Canada (DSL/NDL):

All ingredients listed.
All ingredients listed.



Federal Regulations

SARA Title III Rules

Sections 311/312 Hazard Classes

Fire Hazard:	No
Reactive Hazard:	No
Release of Pressure:	No
Acute Health Hazard:	Yes
Chronic Health Hazard:	No

Other Sections

Component	Section 313 Toxic Chemical	Section 302 EHS TPQ	CERCLA RQ
1-Bromo-3-chloro-5,5-dimethylhydantoin	N/A	N/A	N/A

Comments: None.

State Regulations

California Proposition 65: None.

Special Regulations

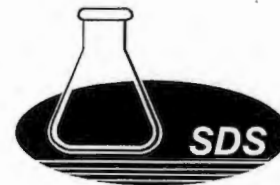
1-Bromo-3-chloro-5,5-dimethylhydantoin	S	None.
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International Regulations

Canada

WHMIS Classification: N/A

Controlled Product Regulations (CPR): N/A



Compliance Information

NSF: Certified to NSF/ANSI Standard 60
 Maximum use rate for potable water – 9 mg/L
 This product ships as NSF from:
 Facility #1 China

Food Regulations: N/A

KOSHER: This product is certified by the Orthodox Union as Kosher for Passover and year-round use.
 Only when prepared by the following ChemTreat facilities:
 Ashland, VA; Eldridge, IA; Nederland, TX; Vernon, CA.

FIFRA: Registered pesticide under 40 CFR 152.10, Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), EPA Registration Number: 83451-4-15300.

Other: PMRA biocide registration NO. 26538.

Comments: None.

Section 16. Other Information

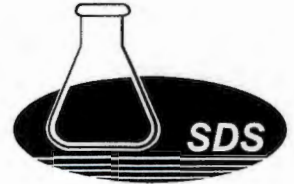
HMIS Hazard Rating

Health: 3
Flammability: 1
Physical Hazard: 1
PPE: X

Notes: The PPE rating depends on circumstances of use. See Section 8 for recommended PPE.
 The Hazardous Material Information System (HMIS) is a voluntary, subjective alpha-numeric symbolic system for recommending hazard risk and personal protection equipment information. It is a subjective rating system based on the evaluator's understanding of the chemical associated risks. The end-user must determine if the code is appropriate for their use.

Abbreviations

Abbreviation	Definition
<	Less Than
>	Greater Than
ACGIH	American Conference of Governmental Industrial Hygienists
EHS	Environmental Health and Safety Dept



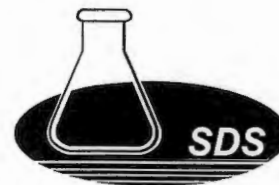
Abbreviation	Definition
N/A	Not Applicable
N/D	Not Determined
N/E	Not Established
OSHA	Occupational Health and Safety Dept
PEL	Personal Exposure Limit
STEL	Short Term Exposure Limit
TLV	Threshold Limit Value
TWA	Time Weight Average
UNK	Unknown

Prepared by: Product Compliance Department; ProductCompliance@chemtreat.com

Revision Date: January 12, 2017

Disclaimer

Although the information and recommendations set forth herein (hereinafter "information") are presented in good faith and believed to be correct as of the date hereof, ChemTreat, Inc. makes no representations as to the completeness or accuracy thereof. Information is supplied upon the condition that the persons receiving same will make their own determination as to its suitability for their purposes prior to use. In no event will ChemTreat, Inc. be responsible for damages of any nature whatsoever resulting from the use or reliance upon information. No representation or warranties, either expressed or implied, of merchantability, fitness for a particular purpose, or of any other nature are made hereunder with respect to information or the product to which information refers.



SAFETY DATA SHEET

Section 1. Chemical Product and Company Identification

Product Name: Quadrasperse® CL5852
Product Use: Cooling Water Treatment
Supplier's Name: ChemTreat, Inc.
Emergency Telephone Number: (800)424-9300 (Toll Free)
Address (Corporate Headquarters): 5640 Cox Road
Glen Allen, VA 23060
Telephone Number for Information: (800)648-4579
Date of MSDS: April 27, 2015
Revision Date: April 27, 2015
Revision Number: 15042701AN

Section 2. Hazard(s) Identification



Signal Word: WARNING

GHS Classification(s): Eye damage/irritation – Category 2b
Acute Toxicity Dermal – Category 5
Acute Toxicity Inhalation – Category 5
Acute Toxicity Oral – Category 4

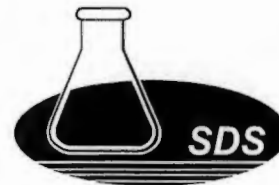
Hazard Statement(s): Causes eye irritation.
May be harmful in contact with skin.
May be harmful if inhaled.
Harmful if swallowed.

Precautionary Statement(s): Wash thoroughly after handling.
Do not eat, drink, or smoke when using this product.

Section 3. Composition/Hazardous Ingredients

Component	CAS Registry #	Wt. %
1-Hydroxyethylidene-1,1-diphosphonic acid, disodium salt	7414-83-7	1-5
Sodium phosphate, monobasic	7558-80-7	3-7

Comments N/A



Section 4. First Aid Measures

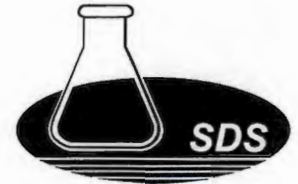
Inhalation:	Remove to fresh air and keep at rest in a position comfortable for breathing. Call a poison center or doctor/physician if you feel unwell.
Eyes:	Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists, get medical advice/attention.
Skin:	Wash with plenty of soap and water. Call a poison center or doctor/physician if you feel unwell.
Ingestion:	DO NOT INDUCE VOMITING. Rinse mouth. Call a POISON CENTER or doctor/physician.
Notes to Physician:	N/A
Additional First Aid Remarks:	N/A

Section 5. Fire Fighting Measures

Flammability of the Product:	Not flammable.
Suitable Extinguishing Media:	Use extinguishing media suitable to surrounding fire.
Specific Hazards Arising from the Chemical:	Use water spray to keep containers cool.
Protective Equipment:	If product is involved in a fire, wear full protective clothing including a positive-pressure, NIOSH approved, self-contained breathing apparatus.

Section 6. Accidental Release Measures

Personal Precautions:	Use appropriate Personal Protective Equipment (PPE).
Environmental Precautions:	Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains, and sewers.



Methods for Cleaning up: Contain and recover liquid when possible. Flush spill area with water spray.

Other Statements: If RQ (Reportable Quantity) is exceeded, report to National Spill Response Office at 1-800-424-8802.

Section 7. Handling and Storage

Handling: Wear appropriate Personal Protective Equipment (PPE) when handling this product. Do not get in eyes, or on skin and clothing. Wash thoroughly after handling. Do not ingest. Avoid breathing vapors, mist or dust.

Storage: Store away from incompatible materials (see Section 10). Store at ambient temperatures. Keep container securely closed when not in use. Label precautions also apply to empty container. Recondition or dispose of empty containers in accordance with government regulations. For Industrial use only. Store above Freeze Point.

Section 8. Exposure Controls/Personal Protection

Exposure Limits

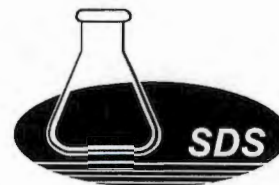
Component	Source	Exposure Limits
1-Hydroxyethylidene-1,1-diphosphonic acid, disodium salt	N/E	N/E
Sodium phosphate, monobasic	N/E	N/E

Engineering Controls: Use only with adequate ventilation. The use of local ventilation is recommended to control emission near the source.

Personal Protection

Eyes: Wear chemical splash goggles or safety glasses with full-face shield. Maintain eyewash fountain in work area.

Skin: Maintain quick-drench facilities in work area. Wear butyl rubber or neoprene gloves. Wash them after each use and replace as necessary. If conditions warrant, wear protective clothing such as boots, aprons, and coveralls to prevent skin contact.



Respiratory:

If misting occurs, use NIOSH approved organic vapor/acid gas dual cartridge respirator with a dust/mist prefilter in accordance with 29 CFR 1910.134.

Section 9. Physical and Chemical Properties

Physical State and Appearance:	Liquid, Straw, Clear
Specific Gravity:	1.170 @ 20°C
pH:	3.5 @ 20°C, 100.0%
Freezing Point:	32°F
Flash Point:	N/D
Odor:	Mild
Melting Point:	N/A
Boiling Point:	N/D
Solubility in Water:	Complete
Evaporation Rate:	N/D
Vapor Density:	N/D
Molecular Weight:	N/D
Viscosity:	<100 CPS @ 20°C
Flammable Limits:	N/A
Autoignition Temperature:	N/A
Density:	9.76 LB/GA
Vapor Pressure:	N/D
% VOC:	N/D
Odor Threshold	N/D
n-octanol Partition Coefficient	N/D
Decomposition Temperature	N/D

Section 10. Stability and Reactivity

Chemical Stability:	Stable at normal temperatures and pressures.
Incompatibility with Various Substances:	Strong bases, Strong oxidizers.
Hazardous Decomposition Products:	Oxides of carbon, Oxides of nitrogen, Oxides of phosphorus.
Possibility of Hazardous Reactions:	None known.



Section 11. Toxicological Information

Chemical Name	Exposure	Type of Effect	Concentration	Species
Sodium phosphate, monobasic	Oral	LD50	8290 MG/KG	Rat

Carcinogenicity Category

Component	Source	Code	Brief Description
1-Hydroxyethylidene-1,1-diphosphonic acid, disodium salt	N/E	N/E	N/E
Sodium phosphate, monobasic	N/E	N/E	N/E

Comments: None.

Section 12. Ecological Information

Species	Duration	Type of Effect	Test Results
Ceriodaphnia dubia	48h	LC50	2102 mg/l
Fathead Minnow	96h	LC50	>10000 mg/l

Comments: Aquatic toxicity data is based on testing of a similar product.

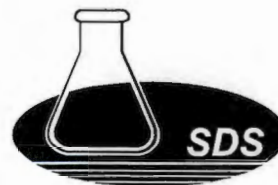
Section 13. Disposal Considerations

Dispose of in accordance with local, state and federal regulations.

Section 14. Transport Information

Controlling Regulation	Proper Shipping Name:	Technical Name:	Hazard Class:	UN/NA#:	Packing Group:
DOT	COMPOUND, INDUSTRIAL WATER TREATMENT, LIQUID	N/A	Not D.O.T. Regulated	N/A	N/A

Note: N/A



Section 15. Regulatory Information

Inventory Status

United States (TSCA):
Canada (DSL/NDSL):

All ingredients listed.
All ingredients listed.

Federal Regulations

SARA Title III Rules

Sections 311/312 Hazard Classes

Fire Hazard:	No
Reactive Hazard:	No
Release of Pressure:	No
Acute Health Hazard:	Yes
Chronic Health Hazard:	No

Other Sections

Component	Section 313 Toxic Chemical	Section 302 EHS TPQ	CERCLA RQ
1-Hydroxyethylidene-1,1-diphosphonic acid, disodium salt	N/A	N/A	N/A
Sodium phosphate, monobasic	N/A	N/A	N/A

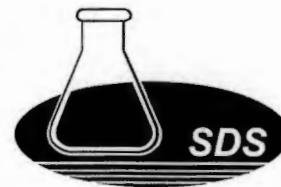
Comments: None.

State Regulations

California Proposition 65: None known.

Special Regulations

Component	States
1-Hydroxyethylidene-1,1-diphosphonic acid, disodium salt	None.
Sodium phosphate, monobasic	None.



International Regulations

Canada

WHMIS Classification:	D2B (Toxic Material)
Controlled Product Regulations (CPR):	This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all the information required by the CPR.

Section 16. Other Information

HMIS Hazard Rating

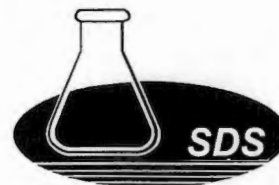
Health:	2
Flammability:	0
Physical Hazard:	0
PPE:	X

Notes: The PPE rating depends on circumstances of use. See Section 8 for recommended PPE. The Hazardous Material Information System (HMIS) is a voluntary, subjective alpha-numeric symbolic system for recommending hazard risk and personal protection equipment information. It is a subjective rating system based on the evaluator's understanding of the chemical associated risks. The end-user must determine if the code is appropriate for their use.

NSF:	N/A
FDA/USDA/GRAS:	N/A
KOSHER:	This product has not been evaluated for Kosher approval.
FIFRA:	N/A
Other:	None

Abbreviations

Abbreviation	Definition
<	Less Than
>	Greater Than
ACGIH	American Conference of Governmental Industrial Hygienists
EHS	Environmental Health and Safety Dept
N/A	Not Applicable



Abbreviation	Definition
N/D	Not Determined
N/E	Not Established
OSHA	Occupational Health and Safety Dept
PEL	Personal Exposure Limit
STEL	Short Term Exposure Limit
TLV	Threshold Limit Value
TWA	Time Weight Average
UNK	Unknown

Prepared by: Product Compliance Department; ProductCompliance@chemtreat.com

Disclaimer

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ATTACHMENT 2

Waste Storage and Disposal Information

NPDES Permit Renewal Application
Solutia, Inc., Anniston, AL NPDES Permit No. AL0001201

Description of Waste	Description of Storage Location
Hazardous Waste Solvents	Satellite Accumulation Area
Used Oil	Satellite Accumulation Area, Maintenance Building
Filter Media Waste	MCC Warehouse
Spent Activated Carbon	MCC Warehouse

SOLUTIA INC.
ACTION BY WRITTEN CONSENT
Power of Attorney

The undersigned, being the sole director of Solutia Inc., a Delaware corporation (the "Corporation"), pursuant to the Delaware General Corporation Law and the Bylaws of the Corporation do hereby consent to the following corporate actions:

RESOLVED, that the Corporation hereby delegates to the Site Manager, and in the Site Manager's absence, the Acting Site Manager ("Authorized Representative") the authority to sign on behalf of the Corporation:

(a) manifests, orders, certifications, applications for or amendments to permits, and reports regarding environmental, health, safety, or security matters to any federal, state, or local government agency; and

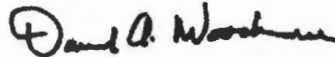
(b) certifications to, applications for or amendments to permits from, and reports to the Bureau of Alcohol and Tobacco Tax and Trade Bureau

(collectively, a "Document") provided the Authorized Representative is satisfied that execution and delivery of such Document is in compliance with applicable policies and procedures of the Corporation and its parent corporation, Eastman Chemical Company, and has received such prior review and approval (including review by legal counsel or a representative of Eastman's Global Health, Safety, Environment and Security organization) as is appropriate for the circumstances; and

FURTHER RESOLVED, THAT the above granted delegation of authority shall remain in force until such time as amended, rescinded or terminated by the Corporation, and that the authorities granted shall automatically terminate as to the Authorized Representative in the event the Authorized Representative's roles and responsibilities no longer encompass the stated areas in the delegation or such Authorized Representative is no longer an employee of Eastman Chemical Company or one of its affiliated companies.


Dated this 1st day of November, 2021.

Solutia Inc.

By: 

David A. Woodmansee
Director

APPENDIX B
USEPA FORM 1

Form 1 NPDES		U.S. Environmental Protection Agency Application for NPDES Permit to Discharge Wastewater GENERAL INFORMATION
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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. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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 ? <input type="checkbox"/> Yes → Complete Form 1 and Form 2B. <input checked="" type="checkbox"/> No
	1.2.2	Is the facility an existing manufacturing, commercial, mining, or silvicultural facility that is currently discharging process wastewater ? <input type="checkbox"/> Yes → Complete Form 1 and Form 2C. <input checked="" type="checkbox"/> No
1.2.3	Is the facility a new manufacturing, commercial, mining, or silvicultural facility that has not yet commenced to discharge ? <input type="checkbox"/> Yes → Complete Form 1 and Form 2D. <input checked="" type="checkbox"/> No	
1.2.4	Is the facility a new or existing manufacturing, commercial, mining, or silvicultural facility that discharges only nonprocess wastewater ? <input type="checkbox"/> Yes → Complete Form 1 and Form 2E. <input checked="" type="checkbox"/> 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 ? <input checked="" type="checkbox"/> Yes → Complete Form 1 and Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). <input type="checkbox"/> No	

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

Name, Mailing Address, and Location	2.1 Facility Name	
	Solutia, Inc.	
	2.2 EPA Identification Number	
	ALD004019048	
	2.3 Facility Contact	
	Name (first and last) Andrew Wendt	Title HSES Manager
Email address andrewd.wendt@eastman.com		
2.4 Facility Mailing Address		
Street or P.O. box 702 Clydesdale Ave.		
City or town Anniston	State AL	ZIP code 36201

RECEIVED

NOV 02 2021

EPA Identification Number ALD004019048	NPDES Permit Number AL0001201	Facility Name Solutia, Inc.	Form Approved 03/05/19 OMB No. 2040-0004
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Name, Mailing Address, and Location Continued	2.5	Facility Location		
		Street, route number, or other specific identifier 702 Clydesdale Ave.		
		County name Calhoun	County code (if known) 015	
		City or town Anniston	State AL	ZIP code 36201

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

SIC and NAICS Codes	3.1	SIC Code(s)	Description (optional)
		2869	Industrial Organic Chemicals, NEC
	3.2	NAICS Code(s)	Description (optional)

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

Operator Information	4.1	Name of Operator		
		Solutia, Inc.		
	4.2	Is the name you listed in Item 4.1 also the owner? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
	4.3	Operator Status		
	<input type="checkbox"/> Public—federal	<input type="checkbox"/> Public—state	<input type="checkbox"/> Other public (specify) _____	
	<input checked="" type="checkbox"/> Private	<input type="checkbox"/> Other (specify) _____		
4.4	Phone Number of Operator			
	(256) 231-8400			
Operator Information Continued	4.5	Operator Address		
		Street or P.O. Box 702 Clydesdale Ave.		
		City or town Anniston	State AL	ZIP code 36201
		Email address of operator chadmoore@eastman.com		

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

Indian Land	5.1	Is the facility located on Indian Land? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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EPA Identification Number ALD004019048	NPDES Permit Number AL0001201	Facility Name Solutia, Inc.
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Form Approved 03/05/19
OMB No. 2040-0004

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)				
	<input checked="" type="checkbox"/>	NPDES (discharges to surface water) AL00121	<input checked="" type="checkbox"/>	RCRA (hazardous wastes) ALD004019048	<input type="checkbox"/>	UIC (underground injection of fluids)
	<input type="checkbox"/>	PSD (air emissions)	<input type="checkbox"/>	Nonattainment program (CAA)	<input type="checkbox"/>	NESHAPs (CAA)
<input type="checkbox"/>	Ocean dumping (MPRSA)	<input type="checkbox"/>	Dredge or fill (CWA Section 404)	<input checked="" type="checkbox"/>	Other (specify) SID Permit, IU350800048; Air F	

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.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> CAFO—Not Applicable (See requirements in Form 2B.)
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SECTION 8. NATURE OF BUSINESS (40 CFR 122.21(f)(8))

Nature of Business	8.1	Describe the nature of your business. The Solutia, Inc. Anniston, AL plant manufactures polyphenyl compounds and blends and packages phosphate ester-based, non-flammable hydraulic fluids.
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SECTION 9. COOLING WATER INTAKE STRUCTURES (40 CFR 122.21(f)(9))

Cooling Water Intake Structures	9.1	Does your facility use cooling water? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.) Municipal Supply

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.)	
<input type="checkbox"/>	Fundamentally different factors (CWA Section 301(n))	<input type="checkbox"/>	Water quality related effluent limitations (CWA Section 302(b)(2))
<input type="checkbox"/>	Non-conventional pollutants (CWA Section 301(c) and (g))	<input type="checkbox"/>	Thermal discharges (CWA Section 316(a))
<input checked="" type="checkbox"/>	Not applicable		

EPA Identification Number
ALD004019048

NPDES Permit Number
AL0001201

Facility Name
Solutia, Inc.

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

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
<input checked="" type="checkbox"/> Section 1: Activities Requiring an NPDES Permit	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 2: Name, Mailing Address, and Location	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 3: SIC Codes	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 4: Operator Information	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 5: Indian Land	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 6: Existing Environmental Permits	<input checked="" type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 7: Map	<input checked="" type="checkbox"/> w/ topographic map <input type="checkbox"/> w/ additional attachments
<input checked="" type="checkbox"/> Section 8: Nature of Business	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 9: Cooling Water Intake Structures	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 10: Variance Requests	<input type="checkbox"/> w/ attachments
<input checked="" type="checkbox"/> Section 11: Checklist and Certification Statement	<input type="checkbox"/> 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)
Chad Moore

Official title
Plant Manager



Signature

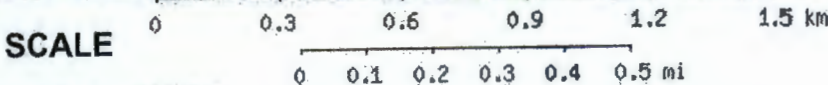
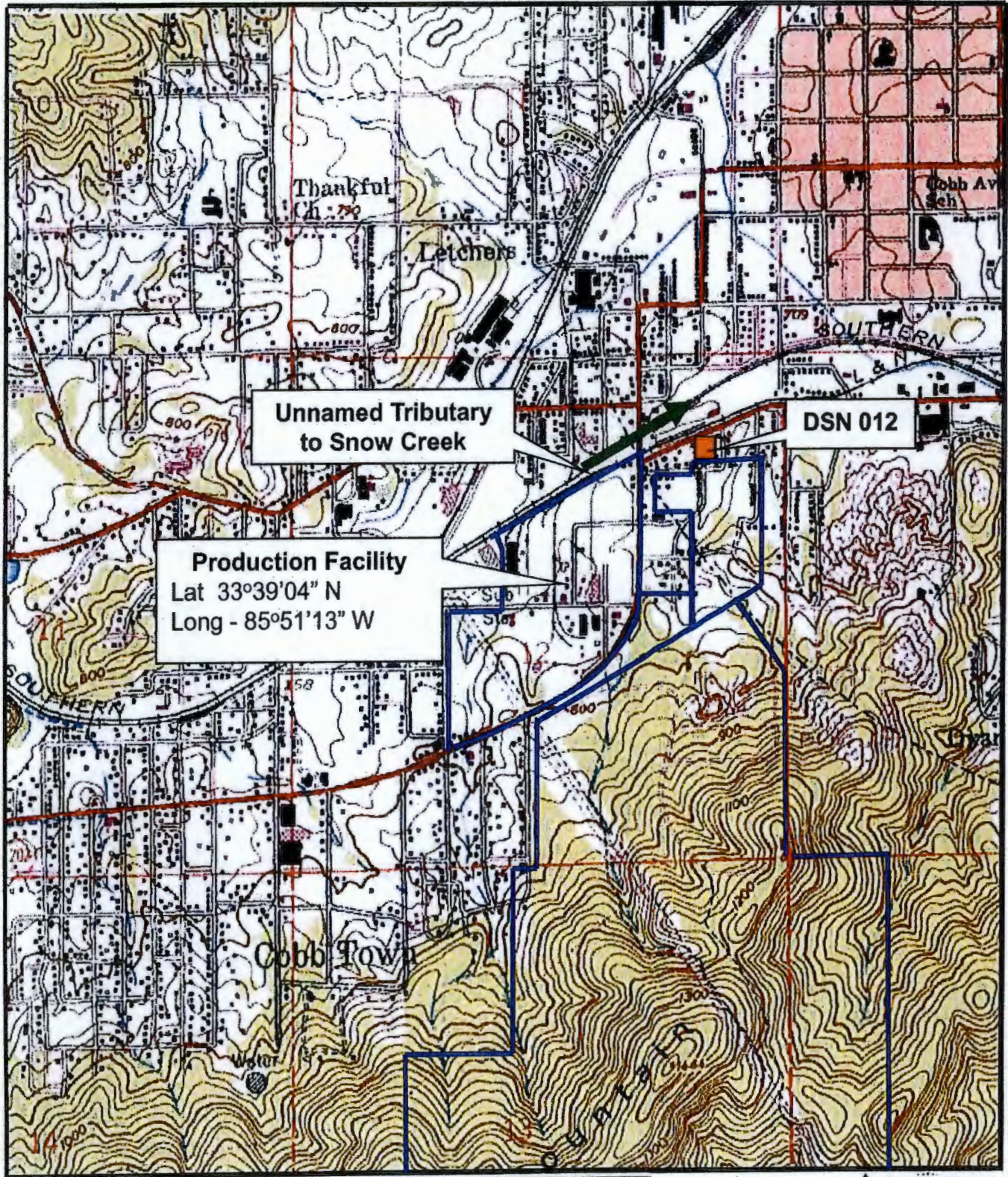


Date signed

10/28/2021

FIGURE A-1
FACILITY LOCATION
SOLUTIA INC. - ANNISTON, ALABAMA

LEGEND	
	Storm Water Outfall
	Site Boundary



Source Data: USGS

NPDES Permit Renewal Application
 Solutia, Inc., Anniston, AL NPDES Permit No. AL0001201

Table XE
 Air Permits
Solutia, Inc. NPDES Permit Application

Permit Number	Description of Source	Date Issued
301-0007-X011	Santotar Storage Tank (22,000 Gallons)	1/21/1998
301-0007-X012	Two (2) 25,000 Gallon Tanks for Storage of Therminol 66J and Returned Therminol 66	1/21/1998
301-0007-X013	Benzene Storage System with Two 60,000 Gallon Horizontal Tanks, and One 11,800 Gallon Benzene Feed Tank Vented to Boiler with Carbon Cannisters as Backup	1/21/1998
301-0007-X014	60,000 Gallon General VOC Storage Tank Vented to Boiler with Carbon Cannisters as Backup	12/12/1997
301-0007-X017	24,400 Gallon Fixed Roof Therminol Storage Tank (#721)	1/21/1998
301-0007-X018	31,800 Gallon Fixed Roof Storage Tank for the Storage of VOCs with Maximum True Vapor Pressures less than 2.17 psia (Tank #741)	1/21/1998
301-0007-X019	24,400 Gallon Fixed Roof Storage Tank for the Storage of VOCs with Maximum True Vapor Pressures less than 2.17 psia (Tank #751)	1/21/1998
301-0007-X020	31,800 Gallon Fixed Roof Diphenyl Oxide Storage Tank (#730)	1/21/1998
301-0007-X021	50,000 Gallon Storage Tank for General VOCs with Vapor Pressures less than 0.51 psia	2/5/1998
301-0007-X022	12,000 Gallon Fixed Roof Storage Tank for Returned Therminol-66 (Tank No. VE0119)	2/10/2000
301-0007-X024	40 MMBtu/hr Natural Gas and Used Oil Fired Process Steam Boiler	5/19/2020
301-0007-Z002	Polyphenyl Manufacturing Process (with Hydrogen-Benzene Flare) and Associated Equipment Including Polyethylbenzene By-Product Distillation	1/21/1998

SOLUTIA INC.
ACTION BY WRITTEN CONSENT
Power of Attorney

The undersigned, being the sole director of Solutia Inc., a Delaware corporation (the "Corporation"), pursuant to the Delaware General Corporation Law and the Bylaws of the Corporation do hereby consent to the following corporate actions:

RESOLVED, that the Corporation hereby delegates to the Site Manager, and in the Site Manager's absence, the Acting Site Manager ("Authorized Representative") the authority to sign on behalf of the Corporation:

(a) manifests, orders, certifications, applications for or amendments to permits, and reports regarding environmental, health, safety, or security matters to any federal, state, or local government agency; and

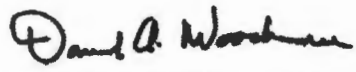
(b) certifications to, applications for or amendments to permits from, and reports to the Bureau of Alcohol and Tobacco Tax and Trade Bureau

(collectively, a "Document") provided the Authorized Representative is satisfied that execution and delivery of such Document is in compliance with applicable policies and procedures of the Corporation and its parent corporation, Eastman Chemical Company, and has received such prior review and approval (including review by legal counsel or a representative of Eastman's Global Health, Safety, Environment and Security organization) as is appropriate for the circumstances; and

FURTHER RESOLVED, THAT the above granted delegation of authority shall remain in force until such time as amended, rescinded or terminated by the Corporation, and that the authorities granted shall automatically terminate as to the Authorized Representative in the event the Authorized Representative's roles and responsibilities no longer encompass the stated areas in the delegation or such Authorized Representative is no longer an employee of Eastman Chemical Company or one of its affiliated companies.


Dated this 1st day of November, 2021.

Solutia Inc.

By: 

David A. Woodmansee
Director

APPENDIX C
USEPA FORM 2F

Form 2F NPDES		U.S Environmental Protection Agency Application for NPDES Permit to Discharge Wastewater STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY
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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
	DSN012	Unnamed Tributary to <i>Snow Creek</i>	33° 39' 22" N	<input checked="" type="checkbox"/>	85° 50' 59"
			° ' "	<input type="checkbox"/>	° ' "
			° ' "	<input type="checkbox"/>	° ' "
			° ' "	<input type="checkbox"/>	° ' "
			° ' "	<input type="checkbox"/>	° ' "
			° ' "	<input type="checkbox"/>	° ' "

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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
		Condition IV.E. RCRA Post-Closure Permit ALD004019048, residual impacts being investigated and addressed under RCRA Corrective Action Program	DNS012	Residual Surface Soil Impact in Unimproved Areas.	
	CERCLA Partial Consent Decree CV-02-PT-0749-E, residual impacts being investigated and addressed under CERCLA	DSN012	Residual Surface Soil Impact in Unimproved Areas		
	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) <input type="checkbox"/> Yes RECEIVED <input checked="" type="checkbox"/> No			

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.)
		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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)		
		DSN012	12.8	<i>specify units</i> acres	67.1	<i>specify units</i> acres
				<i>specify units</i>		<i>specify units</i>
				<i>specify units</i>		<i>specify units</i>
				<i>specify units</i>		<i>specify units</i>
				<i>specify units</i>		<i>specify units</i>
				<i>specify units</i>		<i>specify units</i>
				<i>specify units</i>		<i>specify units</i>
				<i>specify units</i>		<i>specify units</i>
	4.2	Provide a narrative description of the facility's significant material in the space below. (See instructions for content requirements.) The DSN 012 drainage area includes an employee parking lot, administration building and laboratory, polyphenyl and phosphate ester-based hydraulic fluid raw material and product storage areas, a boiler house, loading and unloading areas, a fully-enclosed warehouse, a satellite waste accumulation area, and a closed landfill (South Landfill). The rail loading/unloading areas are covered to minimize stormwater intrusion and are equipped with fiberglass rail pans or paved to allow collection of any material spilled during unloading. Materials stored in the satellite waste accumulation area have secondary containment and are placed under roof prior to off-site disposal. Tank storage areas are secondarily contained via concrete dikes which are drained to the on-site wastewater treatment system.				
	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)		
		DSN012	Stormwater runoff from the closed South Landfill is routed through a retention basin prior to	1-U; 1-Q; 2-		

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

Non-Stormwater Discharges	5.1	<i>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.</i>			
		Name (print or type first and last name)	Official title		
		Chad Moore	Plant Manager		
		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
		DSN 012	r lines are visually inspected quarterly and after signifi		

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

Significant Leaks or Spills	6.1	<p>Describe any significant leaks or spills of toxic or hazardous pollutants in the last three years.</p> <p>T66 leak near the Therminol control room on July 6, 2020. Material was not in secondary containment and was introduced into stormwater discharge. A slight sheen was found at the DSN012 outfall, however no material made it off-site. DSN012 is within the boundary of our property. We viewed the point where the discharge water leaves our site and enters the 11th Street Ditch and there was no sheen present.</p> <p>Effluent violations for pH in November and December 2020: The cause of the low pH readings was tied to a clanout of equipment on the sout side of the Solutia property performed by the Remediation department. It was assumed that all of the cleaning chemical was contained within the system and removed, but some of the chemical escaped and made its way to the S031 outfall causing low pH numbers.</p> <p>Sampling from 12/1/20 showed an out-of-compliance level for Benzene: This incident was traced back to an unloading event from a benzene delivery truck where aproximately 5 lbs of benzene was spilled onto the ground while</p>
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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	<p>Is this a new source or new discharge?</p> <p><input type="checkbox"/> Yes → See instructions regarding submission of <i>estimated data</i>.</p> <p><input checked="" type="checkbox"/> No → See instructions regarding submission of <i>actual data</i>.</p>
	Tables A, B, C, and D	
7.2	<p>Have you completed Table A for each outfall?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	

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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input type="checkbox"/> Yes <input type="checkbox"/> No
7.5	Do you know or have reason to believe any pollutants in Exhibit 2F-2 are present in the discharge? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7.7	Do you qualify for a small business exemption under the criteria specified in the Instructions? <input type="checkbox"/> Yes → SKIP to Item 7.18. <input checked="" type="checkbox"/> No
7.8	Do you know or have reason to believe any pollutants in Exhibit 2F-3 are present in the discharge? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7.10	Do you expect any of the pollutants in Exhibit 2F-3 to be discharged in concentrations of 10 ppb or greater? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)? <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7.15	Do you know or have reason to believe any pollutants in Exhibit 2F-4 are present in the discharge? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7.17	Have you provided information for the storm event(s) sampled in Table D? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

EPA Identification Number ALD004019048	NPDES Permit Number AL0001201	Facility Name Solutia, Inc.
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Form Approved 03/05/19
OMB No. 2040-0004

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?	
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Section 8.	
	7.19	List the pollutants below, including TCDD if applicable.	
	1.	4.	7.
	2.	5.	8.
	3.	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?		
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> 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?		
		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Section 10.		
	9.2	Provide information for each contract laboratory or consulting firm below.		
			Laboratory Number 1	Laboratory Number 2
		Name of laboratory/firm	Laboratory Resources & Solutions, Inc.	
		Laboratory address	205 6th Avenue Ashville, AL 35953	
	Phone number	(205) 594-1445		
	Pollutant(s) analyzed	All analyses		

EPA Identification Number
ALD004019048

NPDES Permit Number
AL0001201


Facility Name
Solutia, Inc.

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

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
	<input checked="" type="checkbox"/> Section 1	<input type="checkbox"/> w/ attachments (e.g., responses for additional outfalls)
	<input checked="" type="checkbox"/> Section 2	<input type="checkbox"/> w/ attachments
	<input checked="" type="checkbox"/> Section 3	<input type="checkbox"/> w/ site drainage map
	<input checked="" type="checkbox"/> Section 4	<input type="checkbox"/> w/ attachments
	<input checked="" type="checkbox"/> Section 5	<input type="checkbox"/> w/ attachments
	<input checked="" type="checkbox"/> Section 6	<input type="checkbox"/> w/ attachments
	<input checked="" type="checkbox"/> Section 7	<input type="checkbox"/> Table A <input type="checkbox"/> w/ small business exemption request <input checked="" type="checkbox"/> Table B <input type="checkbox"/> w/ analytical results as an attachment <input checked="" type="checkbox"/> Table C <input type="checkbox"/> Table D
	<input type="checkbox"/> Section 8	<input type="checkbox"/> w/attachments
	<input checked="" type="checkbox"/> Section 9	<input type="checkbox"/> w/attachments (e.g., responses for additional contact laboratories or firms)
	<input checked="" type="checkbox"/> Section 10	<input type="checkbox"/>

10.2	Certification Statement	
	<p><i>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.</i></p>	
	Name (print or type first and last name) Chad Moore	Official title Plant Manager
	Signature 	Date signed 10/28/2021

EPA Identification Number ALD004019048	NPDES Permit Number AL0001201	Facility Name Solutia, Inc.	Outfall Number DSN012
-------------------------------------------	----------------------------------	--------------------------------	--------------------------

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. Biochemical oxygen demand (BOD ₅)						
3. Chemical oxygen demand (COD)						
4. Total suspended solids (TSS)						
5. Total phosphorus						
6. Total Kjeldahl nitrogen (TKN)						
7. Total nitrogen (as N)						
8. pH (minimum)						
pH (maximum)						

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 ALD004019048	NPDES Permit Number ALO001201	Facility Name Solutia, Inc.	Outfall Number DSN012
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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		
Benzene						
Carbon Tetrachloride						
Chlorobenzene						
Chloroethane						
Chloroform						
1,2-Dichlorobenzene						
1,3-Dichlorobenzene						
1/4-Dichlorobenzene						
1,1-Dichloroethane						
1,2-Dichloroethane						
1,1-Dichloroethylene						
1,2-Trans-Dichloroethylene						
1,2-Dichloropropane						
1,3-Dichloropropylene						
Ethylbenzene						
Methyl Chloride						

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).

EPA Identification Number ALD004019048	NPDES Permit Number AL0001201	Facility Name Solutia, Inc.	Outfall Number DSN012
-------------------------------------------	----------------------------------	--------------------------------	--------------------------

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 <small>(new source/new dischargers only; use codes in instructions)</small>
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
Methylene Chloride						
Tetrachloroethylene						
Toluene						
1,1,1-Trichloroethane						
1,1,2-Trichloroethane						
Trichloroethylene						
Vinyl Chloride						
Acenaphthylene						
Anthracene						

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 ALD004019048	NPDES Permit Number AL0001201	Facility Name Solutia, Inc.	Outfall Number DSN012
-------------------------------------------	----------------------------------	--------------------------------	--------------------------

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		
Iron						
Manganese						
Total Dissolved Solids						
PCB-1016						
PCB-1221						
PCB-1232						
PCB-1242						
PCB-1248						
PCB-1254						
PCB-1260						
Total PCBs						

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
ALD004019048

NPDES Permit Number
AL0001201

Facility name
Solutia, Inc.

Outfall Number
DSN012

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.
V-notched weir rating table

SOLUTIA INC.
ACTION BY WRITTEN CONSENT
Power of Attorney

The undersigned, being the sole director of Solutia Inc., a Delaware corporation (the "Corporation"), pursuant to the Delaware General Corporation Law and the Bylaws of the Corporation do hereby consent to the following corporate actions:

RESOLVED, that the Corporation hereby delegates to the Site Manager, and in the Site Manager's absence, the Acting Site Manager ("Authorized Representative") the authority to sign on behalf of the Corporation:

(a) manifests, orders, certifications, applications for or amendments to permits, and reports regarding environmental, health, safety, or security matters to any federal, state, or local government agency; and

(b) certifications to, applications for or amendments to permits from, and reports to the Bureau of Alcohol and Tobacco Tax and Trade Bureau

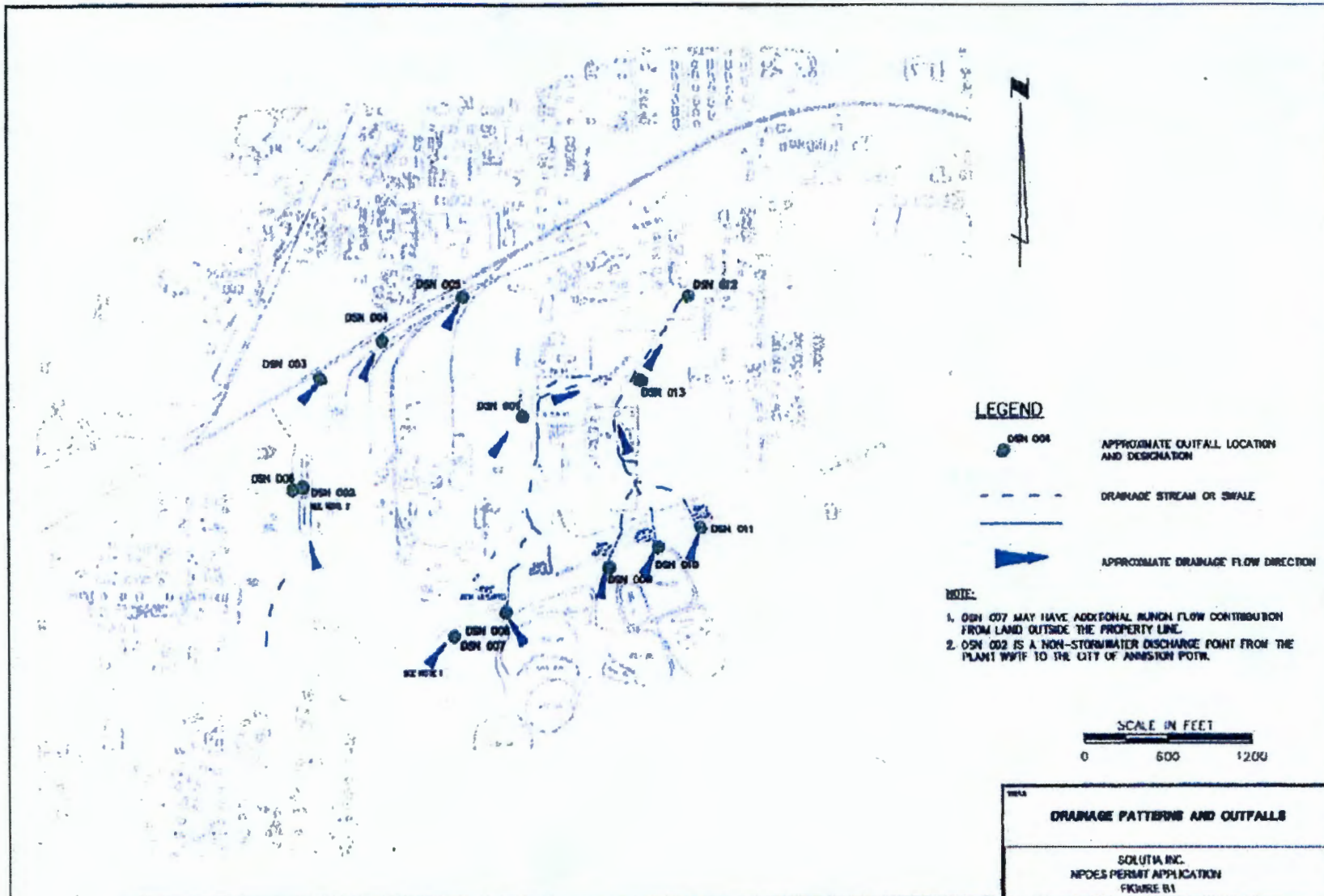
(collectively, a "Document") provided the Authorized Representative is satisfied that execution and delivery of such Document is in compliance with applicable policies and procedures of the Corporation and its parent corporation, Eastman Chemical Company, and has received such prior review and approval (including review by legal counsel or a representative of Eastman's Global Health, Safety, Environment and Security organization) as is appropriate for the circumstances; and

FURTHER RESOLVED, THAT the above granted delegation of authority shall remain in force until such time as amended, rescinded or terminated by the Corporation, and that the authorities granted shall automatically terminate as to the Authorized Representative in the event the Authorized Representative's roles and responsibilities no longer encompass the stated areas in the delegation or such Authorized Representative is no longer an employee of Eastman Chemical Company or one of its affiliated companies.

Dated this 1st day of November, 2021.

Solutia Inc.

By: David A. Woodmansee
David A. Woodmansee
Director





LRS, Inc.

Laboratory Resources & Solutions, Inc.

P.O. Box 1260
205 6th Avenue
Ashville, AL 35953
(205) 594-1445
www.lab-resource.com

Analytical Data Report

Client: **Eastman Chemical Company**

702 Clyesdale Avenue
Anniston, AL 36201

Attention: Ms. Heather Hollingsworth

Project ID: **Eastman Stormwater Renewal (October 12, 2022)**
Permit # AL0001201

Laboratory Report Numbers:

L-101422-08 (LRS)
22-287-0096 (Waypoint)

Report Date: October 28, 2022

Data Reviewed by:

Sherry McKinney

Sherry McKinney
Assistant Project Manager
Laboratory Resources & Solutions, Inc.
smckinney@lab-resource.com

- This report contains results of analysis conducted by two lab facilities:
 - Laboratory Resources & Solutions, Inc. (LRS)
 - Waypoint Analytical, Inc., 2790 Whitten Road, Memphis, TN 38133. NELAC #460181
- These results relate only to the items tested. This report may only be reproduced in full.
- Local support services for this project are also provided by LRS.
- All questions regarding this report should be directed to LRS, Inc. at (205) 594-1445.



Laboratory Resources and Solutions, Inc.
A Full Service Analytical Laboratory Provider

www.lab-resource.com
PO Box 1260/205 6th Ave
Ashville, Alabama 35953
Telephone: 1-205-594-1445
Fax: 1-205 594-1132

CERTIFICATE OF ANALYSIS

Laboratory Report ID: L-101422-08

Client: Eastman Chemical Company

Address: 702 Clydesdale Avenue
Anniston, AL 36201

Contact: Heather Hollowingsworth
Telephone: 256-231-8549
Email: HeatherL.Hollingsworth@eastman.com

Project ID: Eastman Stormwater Renewal
Permit ID: AL001201

LRS Sample ID: 101422-0809
Client Sample ID: DSN012Q

Date & Time Collected: 10/12/22@1305
Date & Time Received: 10/14/22@0845
Matrix: Aqueous

Parameter	Result	Units	MQL	DF	Date/Time Analyzed	Analyst	Method
Biochemical Oxygen Demand (5-day)	5	mg/L	2	1	10/14/22@1232	JKL	SM5210B
Total Suspended Solids (TSS)	46	mg/L	2	1	10/17/22@1338	JKL	SM2540D
Total Dissolved Solids (TDS)	179	mg/L	2	1	10/17/22@1338	JKL	SM2540C

Method Reference – Standard Methods for the Examination of Water and Wastewater, 23rd Edition



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QUALITY CONTROL DATA

PROJECT INFORMATION
Eastman Stormwater Renewal
L-101422-08

BOD-5-Day QC Analytical Batch: R-120172

Lab. Reagent Blank (LRB)

Parameter	LRB Results	Units	MQL	DF	Date/Time Analyzed	Method
Biochemical Oxygen Demand (5-day)	<2	mg/L	2	1	10/14/22@1232	SM5210B

Laboratory Control (LC)*

Parameter	LC Result	Units	LC Range	LC % Recovered	Date/Time Analyzed	Method
Biochemical Oxygen Demand (5-day)	187	mg/L	168-228	95%	10/13/22@1439	SM5210B

Duplicate: 101422-1112R

Parameter	Sample Result	Duplicate Result	Units	RPD	Date/Time Analyzed	Method
Biochemical Oxygen Demand (5-day)	5	4	mg/L	20%	10/13/22@1439	SM5210B

Method Reference – Standard Methods for the Examination of Water and Wastewater, 23rd Edition

Laboratory Control (LC) for BOD is Dextrose/d-glutamic acid – Certified @ 198mg/L (168-228).

RPD= Relative Percent Difference, acceptable range: <25%



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QUALITY CONTROL DATA

PROJECT INFORMATION
Eastman Stormwater Renewal
L-101422-08

Total Suspended Solids QC Analytical Batch: R-100154

Lab. Reagent Blank (LRB)

Parameter	LRB Results	Units	MQL	DF	Date/Time Analyzed	Method
Total Suspended Solids (TSS)	<2	mg/L	2	1	10/17/22@1338	SM2540D

Laboratory Control (LC)

Parameter	LC Result	Units	LC Range	LC % Recovered	Date/Time Analyzed	Method
Total Suspended Solids (TSS)	94	mg/L	80-120	94%	10/17/22@1338	SM2540D

Duplicate: 101422-0607R

Parameter	Sample Result	Duplicate Result	Units	RPD	Date/Time Analyzed	Method
Total Suspended Solids (TSS)	10	9	mg/L	10%	10/17/22@1338	SM2540D

Method Reference – Standard Methods for the Examination of Water and Wastewater, 23rd Edition

Laboratory Control – Celite 545 certified at 100mg/L (Acceptable Range = 80-120mg/L)

RPD= Relative Percent Difference, acceptable range: <25%



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QUALITY CONTROL DATA

PROJECT INFORMATION
Eastman Stormwater Renewal
L-101422-08

Total Dissolved Solids QC Analytical Batch: R-110028

Lab. Reagent Blank (LRB)

Parameter	LRB Results	Units	MQL	DF	Date/Time Analyzed	Method
Total Dissolved Solids (TDS)	<2	mg/L	2	1	10/17/22@1338	SM2540C

Laboratory Control (LC)

Parameter	LC Result	Units	LC Range	LC % Recovered	Date/Time Analyzed	Method
Total Dissolved Solids (TDS)	61	mg/L	40-60	122%	10/17/22@1338	SM2540C

Duplicate: 101422-0607R

Parameter	Sample Result	Duplicate Result	Units	RPD	Date/Time Analyzed	Method
Total Dissolved Solids (TDS)	180	192	mg/L	6%	10/17/22@1338	SM2540C

* The Laboratory Control result for the QC sample for Total Dissolved Solids fell outside the acceptable range (40mg/L-60mg/L). All other QA/QC were within limits, the data is considered acceptable.

Method Reference – Standard Methods for the Examination of Water and Wastewater, 23rd Edition

Laboratory Control – Sodium Chloride Standard Certified @ 50 mg/L (Acceptable Range 40-50 mg/L)

RPD= Relative Percent Difference, acceptable range: <25%

10/27/2022

Eastman Chemical Company
Ms. Heather Hollingsworth
702 Clydesdale Ave
Anniston, AL, 36201

Ref: Analytical Testing
Lab Report Number: 22-287-0096
Client Project Description: Eastman Chemical Stormwater Renewal
Anniston, AL
Project #AL0001201

Dear Ms. Heather Hollingsworth:

Waypoint Analytical, LLC. received sample(s) on 10/14/2022 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method. Where the laboratory was not responsible for the sampling stage (refer to the chain of custody) results apply to the sample as received.

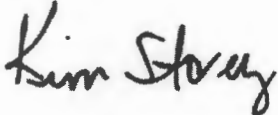
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2021) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Kim S Storey

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.





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www.waypointanalytical.com

Certification Summary

Laboratory ID: WP MTN: Waypoint Analytical, LLC., Memphis, TN

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/28/2023
Arkansas	State Program	88-0650	02/07/2023
California	State Program	2904	06/30/2023
Florida	State Program - NELAP	E871157	06/30/2023
Georgia	State Program	C044	02/18/2023
Georgia	State Program	04015	06/30/2023
Illinois	State Program - NELAP	200078	10/10/2023
Kentucky	State Program	80215	06/30/2023
Kentucky	State Program	KY90047	12/31/2022
Louisiana	State Program - NELAP	LA037	12/31/2022
Louisiana	State Program - NELAP	04015	06/30/2023
Mississippi	State Program	MS	02/11/2023
North Carolina	State Program	47701	07/31/2023
North Carolina	State Program	415	12/31/2022
Pennsylvania	State Program - NELAP	68-03195	05/31/2023
South Carolina	State Program	84002	06/30/2022
Tennessee	State Program	02027	02/11/2023
Texas	State Program - NELAP	T104704180	09/30/2022
Virginia	State Program	00106	06/30/2023
Virginia	State Program - NELAP	460181	09/14/2023



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Sample Summary Table

Report Number: 22-287-0096
Client Project Description: Eastman Chemical Stormwater Renewal
Anniston, AL
Project #AL0001201

Lab No	Client Sample ID	Matrix	Date Collected	Date Received
97126	DSN012Q	Aqueous	10/12/2022 13:05	10/14/2022



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21058
 Eastman Chemical Company
 Ms. Heather Hollingsworth
 702 Clydesdale Ave
 Anniston , AL 36201

Project Eastman Chemical Stormwater Renewal
 Information : Anniston, AL
 Project #AL0001201

Report Date : 10/27/2022
 Received : 10/14/2022

Report Number : 22-287-0096

REPORT OF ANALYSIS

Lab No : 97126
 Sample ID : DSN012Q

Matrix: Aqueous
 Sampled: 10/12/2022 13:05

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	10/21/22 11:00	FMM	4500CNE-2016
COD (Chemical Oxygen Demand)	<15.0	mg/L	15.0	1	10/19/22 13:20	SLT	5220D-2011
Nitrate (NO3-N)	0.610	mg/L	0.100	1	10/14/22 12:59	SRJ	EPA-300.0
Nitrite (NO2-N)	<0.100	mg/L	0.100	1	10/14/22 12:59	SRJ	EPA-300.0
Nitrate+Nitrite-N	0.654	mg/L	0.100	1	10/20/22 14:28	ZBD	4500NO3F-2016
HEM: Oil and Grease	<1.4	mg/L	1.4	1	10/26/22 15:30	RDP	1664B
Total Kjeldahl Nitrogen	<1.00	mg/L	1.00	1	10/19/22 13:15	ANH	4500NORGD-2011
Phosphorus	3.51	mg/L	0.100	1	10/19/22 04:53	EAL	EPA-200.7
Iron	7.09	mg/L	0.100	1	10/19/22 04:53	EAL	EPA-200.7
Lead	0.0062	mg/L	0.0060	1	10/19/22 04:53	EAL	EPA-200.7
Manganese	2.87	mg/L	0.0100	1	10/19/22 04:53	EAL	EPA-200.7
Zinc	0.182	mg/L	0.0200	1	10/19/22 04:53	EAL	EPA-200.7

**Qualifiers/
 Definitions**

DF Dilution Factor

MQL Method Quantitation Limit



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21058
 Eastman Chemical Company
 Ms. Heather Hollingsworth
 702 Clydesdale Ave
 Anniston, AL 36201

Project Eastman Chemical Stormwater Renewal
 Information : Anniston, AL
 Project #AL0001201

Report Date : 10/27/2022
 Received : 10/14/2022

Report Number : 22-287-0096

REPORT OF ANALYSIS

Lab No : 97126
 Sample ID : DSN012Q

Matrix: Aqueous
 Sampled: 10/12/2022 13:05

Analytical Method: 608.3 (PCB) **Prep Batch(es):** L643813 10/18/22 01:03
Prep Method: EPA-608.3 (PCB PREP)

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Aroclor 1016	<0.200	µg/L	0.200	1	10/19/22 15:08	VIC	L644138
Aroclor 1221	<0.200	µg/L	0.200	1	10/19/22 15:08	VIC	L644138
Aroclor 1232	<0.200	µg/L	0.200	1	10/19/22 15:08	VIC	L644138
Aroclor 1242	5.67	µg/L	0.200	1	10/19/22 15:08	VIC	L644138
Aroclor 1248	<0.200	µg/L	0.200	1	10/19/22 15:08	VIC	L644138
Aroclor 1254	<0.200	µg/L	0.200	1	10/19/22 15:08	VIC	L644138
Aroclor 1260	<0.200	µg/L	0.200	1	10/19/22 15:08	VIC	L644138
Surrogate: Decachlorobiphenyl	66.5		Limits: 25-125%	1	10/19/22 15:08	VIC	608.3 (PCB)
Surrogate: Tetrachloro-m-xylene	85.8		Limits: 25-125%	1	10/19/22 15:08	VIC	608.3 (PCB)

Analytical Method: 624.1 **Prep Batch(es):** L643976 10/18/22 11:29
Prep Method: 624.1

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Acrolein	<20.0	µg/L	20.0	1	10/18/22 17:37	HRS	L644039
Acrylonitrile	<20.0	µg/L	20.0	1	10/18/22 17:37	HRS	L644039
Benzene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Bromodichloromethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Bromoform	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Bromomethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Carbon Tetrachloride	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Chlorobenzene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Chlorodibromomethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit



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21058
 Eastman Chemical Company
 Ms. Heather Hollingsworth
 702 Clydesdale Ave
 Anniston, AL 36201

Project Eastman Chemical Stormwater Renewal
 Information : Anniston, AL
 Project #AL0001201

Report Date : 10/27/2022
 Received : 10/14/2022

Report Number : 22-287-0096

REPORT OF ANALYSIS

Lab No : 97126
 Sample ID : DSN012Q

Matrix: Aqueous
 Sampled: 10/12/2022 13:05

Analytical Method: 624.1 Prep Batch(es): L643976 10/18/22 11:29
 Prep Method: 624.1

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Chloroethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
2-Chloroethylvinyl Ether	<5.00	µg/L	5.00	1	10/18/22 17:37	HRS	L644039
Chloroform	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Chloromethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,2-Dichlorobenzene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,3-Dichlorobenzene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,4-Dichlorobenzene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,1-Dichloroethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,2-Dichloroethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,1-Dichloroethene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
cis-1,2-Dichloroethene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
trans-1,2-Dichloroethene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,2-Dichloroethene (Total)	<1.00	µg/L	1.00	1	10/18/22 17:37		L644039
1,2-Dichloropropane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
cis-1,3-Dichloropropene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
trans-1,3-Dichloropropene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,3-Dichloropropene (Total)	<1.00	µg/L	1.00	1	10/18/22 17:37		L644039
Ethylbenzene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Methylene Chloride	<10.0	µg/L	10.0	1	10/18/22 17:37	HRS	L644039
1,1,1,2-Tetrachloroethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,1,2,2-Tetrachloroethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Tetrachloroethene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Toluene	<5.00	µg/L	5.00	1	10/18/22 17:37	HRS	L644039

Qualifiers/Definitions DF Dilution Factor MQL Method Quantitation Limit



2790 Whitten Road, Memphis, TN 38133
 Main 901.213.2400 ° Fax 901.213.2440
 www.waypointanalytical.com

21058
 Eastman Chemical Company
 Ms. Heather Hollingsworth
 702 Clydesdale Ave
 Anniston , AL 36201

Project Eastman Chemical Stormwater Renewal
 Information : Anniston, AL
 Project #AL0001201

Report Date : 10/27/2022
 Received : 10/14/2022

Report Number : 22-287-0096

REPORT OF ANALYSIS

Lab No : 97126
 Sample ID : DSN012Q

Matrix: Aqueous
 Sampled: 10/12/2022 13:05

Analytical Method: 624.1 **Prep Batch(es):** L643976 10/18/22 11:29
Prep Method: 624.1

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
1,1,1-Trichloroethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
1,1,2-Trichloroethane	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Trichloroethene	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Vinyl Chloride	<1.00	µg/L	1.00	1	10/18/22 17:37	HRS	L644039
Surrogate: 4-Bromofluorobenzene	84.6		Limits: 71-131%	1	10/18/22 17:37	HRS	L644039
Surrogate: Dibromofluoromethane	101		Limits: 70-128%	1	10/18/22 17:37	HRS	L644039
Surrogate: 1,2-Dichloroethane - d4	85.6		Limits: 67-136%	1	10/18/22 17:37	HRS	L644039
Surrogate: Toluene-d8	84.6		Limits: 70-130%	1	10/18/22 17:37	HRS	L644039

Analytical Method: 625.1 **Prep Batch(es):** L644112 10/19/22 13:49
Prep Method: 625.1

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Acenaphthene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Acenaphthylene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Anthracene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Benzidine	<22.2	µg/L	22.2	1	10/22/22 00:44	VBW	L644272
Benzo(a)anthracene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Benzo(a)pyrene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Benzo(b)fluoranthene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Benzo(g,h,i)perylene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Benzo(k)fluoranthene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Bis(2-Chloroethoxy)methane	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit



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21058
 Eastman Chemical Company
 Ms. Heather Hollingsworth
 702 Clydesdale Ave
 Anniston , AL 36201

Project Eastman Chemical Stormwater Renewal
 Information : Anniston, AL
 Project #AL0001201

Report Date : 10/27/2022
 Received : 10/14/2022

Report Number : 22-287-0096

REPORT OF ANALYSIS

Lab No : 97126
 Sample ID : DSN012Q

Matrix: Aqueous
 Sampled: 10/12/2022 13:05

Analytical Method: 625.1 Prep Batch(es): L644112 10/19/22 13:49
 Prep Method: 625.1

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Bis(2-Chloroethyl)ether	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Bis(2-Chloroisopropyl)ether	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Bis(2-ethylhexyl)phthalate	<11.1	µg/L	11.1	1	10/22/22 00:44	VBW	L644272
4-Bromophenyl phenyl ether	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Butyl benzyl phthalate	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
4-Chloro-3-methylphenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
2-Chloronaphthalene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
2-Chlorophenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
4-Chlorophenyl phenyl ether	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Chrysene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Dibenz(a,h)anthracene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
1,2-Dichlorobenzene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
1,3-Dichlorobenzene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
1,4-Dichlorobenzene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
3,3'-Dichlorobenzidine	<11.1	µg/L	11.1	1	10/22/22 00:44	VBW	L644272
2,4-Dichlorophenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Diethyl phthalate	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Dimethyl phthalate	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
2,4-Dimethylphenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Di-n-butyl phthalate	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
4,6-Dinitro-2-methylphenol	<11.1	µg/L	11.1	1	10/22/22 00:44	VBW	L644272
2,4-Dinitrophenol	<22.2	µg/L	22.2	1	10/22/22 00:44	VBW	L644272
2,4-Dinitrotoluene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit



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21058
 Eastman Chemical Company
 Ms. Heather Hollingsworth
 702 Clydesdale Ave
 Anniston , AL 36201

Project Eastman Chemical Stormwater Renewal
 Information : Anniston, AL
 Project #AL0001201

Report Date : 10/27/2022
 Received : 10/14/2022

Report Number : 22-287-0096

REPORT OF ANALYSIS

Lab No : 97126
 Sample ID : DSN012Q

Matrix: Aqueous
 Sampled: 10/12/2022 13:05

Analytical Method: 625.1 Prep Batch(es): L644112 10/19/22 13:49
 Prep Method: 625.1

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
2,6-Dinitrotoluene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Di-n-Octyl Phthalate	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
1,2-Diphenylhydrazine/Azobenzene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Fluoranthene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Fluorene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Hexachlorobenzene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Hexachlorobutadiene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Hexachlorocyclopentadiene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Hexachloroethane	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Indeno(1,2,3-cd)pyrene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Isophorone	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Naphthalene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Nitrobenzene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
2-Nitrophenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
4-Nitrophenol	<11.1	µg/L	11.1	1	10/22/22 00:44	VBW	L644272
N-Nitrosodimethylamine	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
N-Nitrosodiphenylamine	<11.1	µg/L	11.1	1	10/22/22 00:44	VBW	L644272
N-Nitroso-di-n-propylamine	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Pentachlorophenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Phenanthrene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
Phenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Pyrene	<2.22	µg/L	2.22	1	10/22/22 00:44	VBW	L644272
1,2,4-Trichlorobenzene	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit



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 www.waypointanalytical.com

21058
 Eastman Chemical Company
 Ms. Heather Hollingsworth
 702 Clydesdale Ave
 Anniston, AL 36201

Project Eastman Chemical Stormwater Renewal
 Information : Anniston, AL
 Project #AL0001201

Report Date : 10/27/2022
 Received : 10/14/2022

Report Number : 22-287-0096

REPORT OF ANALYSIS

Lab No : 97126
 Sample ID : DSN012Q

Matrix: Aqueous
 Sampled: 10/12/2022 13:05

Analytical Method: 625.1 Prep Batch(es): L644112 10/19/22 13:49
 Prep Method: 625.1

Test	Results	Units	MLL	DF	Date / Time Analyzed	By	Analytical Batch
2,4,6-Trichlorophenol	<5.56	µg/L	5.56	1	10/22/22 00:44	VBW	L644272
Surrogate: 2-Fluorobiphenyl	58.1		Limits: 30-107%	1	10/22/22 00:44	VBW	L644272
Surrogate: 2-Fluorophenol	19.0		Limits: 8-88%	1	10/22/22 00:44	VBW	L644272
Surrogate: Nitrobenzene-d5	50.8		Limits: 29-105%	1	10/22/22 00:44	VBW	L644272
Surrogate: Phenol-d6	12.0		Limits: 7-58%	1	10/22/22 00:44	VBW	L644272
Surrogate: 4-Terphenyl-d14	73.3		Limits: 30-130%	1	10/22/22 00:44	VBW	L644272
Surrogate: 2,4,6-Tribromophenol	70.2		Limits: 16-138%	1	10/22/22 00:44	VBW	L644272

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit

Shipment Receipt Form

Customer Number: **21058**
 Customer Name: **Eastman Chemical Company**
 Report Number: **22-287-0096**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID:

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers/boxes received	<input type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Not Present
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Present
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)		<input type="checkbox"/> Low concentration EnCore samplers (48 hr)	
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)		<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)	
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Signature: Date & Time:

Billing Information:

Laboratory Resources and Solutions, Inc.
 P.O. Box 1260
 205 6th Avenue
 Ashville, Alabama 35953
 (205) 594-1445



LRS Client Information:

Eastman Chemical Company
 702 Clydesdale Avenue
 Anniston, AL 36201

"Report to" Contact
Ms. Heather Hollingsworth

Analysis/Container/Preservative

Total Nitrate (NO3) E300.0 (One 250-mL HDPE, non-preserved)	Total Nitrite (NO2) E300.0	NO2/NO3 SM4500-NO3 (One 250-mL HDPE, H2SO4-preserved)	Total Cyanide SM4500-CN-E (One 250-mL HDPE, NaOH-pres.)	TSS SM2540B (One 500-mL HDPE, non-preserved)	TDS SM2540C	BOD SM5210 (One 1-liter HDPE, non-preserved)	Oil & Grease E1664 (One 1-liter amber glass, H2SO4-preserved)	COD SM5220 (One 500-mL HDPE, H2SO4-preserved)	TKN SM4500-Norg	Fe, Pb, Mn, Zn and Phos. E200.7 (One 250-mL HDPE, HNO3-pres)	Total VOCs E624.1 (Two 40-mL VOA vials, HCl-preserved)	Total SVOCs E625.1 (One 1-Liter amber glass, non-preserved)	PCBs E608 (One 1-liter amber glass, non-preserved)
-------------------------------------------------------------	----------------------------	-------------------------------------------------------	---------------------------------------------------------	----------------------------------------------	-------------	----------------------------------------------	---------------------------------------------------------------	-----------------------------------------------	-----------------	--------------------------------------------------------------	--------------------------------------------------------	-------------------------------------------------------------	----------------------------------------------------

Laboratory Resources and Solutions, Inc.
 A Laboratory Service Provider



Laboratory:
 Waypoint Analytical
 2790 Whitten Road
 Memphis, TN 38133

Project Name: Eastman Stormwater Renewal

City/State collected
 Anniston, Alabama
 P O #

Collected by
 Heather Hollingsworth

Client Project #: AL0001201

Collected by (signature)
 Heather Hollingsworth

Project Turnaround (Begins on Lab Login Date)

RUSH? Please Notify LRS
 ___ Same Day (200%)
 ___ Next Day (100%)
 ___ Two Day (50%)
 ___ Three Day (25%)

Date Results Needed:

Number of Containers

Packed on ice? N Y

Sample Information	Sample ID	Comp/Grab	Matrix	Depth	Date	Time	Analysis/Container/Preservative													Sample Remarks					
	DSN012Q Composite	Comp	SW				Total Nitrate (NO3) E300.0	Total Nitrite (NO2) E300.0	NO2/NO3 SM4500-NO3	Total Cyanide SM4500-CN-E	TSS SM2540B	TDS SM2540C	BOD SM5210	Oil & Grease E1664	COD SM5220	TKN SM4500-Norg	Fe, Pb, Mn, Zn and Phos. E200.7	Total VOCs E624.1	Total SVOCs E625.1		PCBs E608				
	DSN012Q - Grab	Grab	SW	*****	10/12/22	1:05 PM	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	HEAT 10/12/22

Custody Seals

received on:

Cooler(s)/Container(s)

22-287-0096
 21058
 10-14-2022
 12:11:51
 Eastman Chemical Company
 Eastman Chemical Stormwater

Matrix*: SS - Soil/Solid GW - Groundwater WW - Wastewater SW - Surface Water DW - Drinking Water SLW - Solid Waste LQW - Liquid Waste
 SOL - Solvent OI - Oil WI - Wipes PW - Process Water OT - Other (Describe)

pH _____ Temp 1.32
 Flow _____ Other T135

Project Remarks:

Rainfall in inches _____

Custody Info	Relinquished by (Signature)	Date	Time	Received by (Signature)	Date	Time	Condition
	<i>Heather Hollingsworth</i>	10/12/22	2:10 PM	<i>d. Bunsley</i>	10/13/22	0931	
	Relinquished by (Signature)	Date	Time	Received by (Signature)	Date	Time	Bottles Received
<i>d. Bunsley</i>	10/13/22	1700	<i>Smiley Peterson</i>	10/14/22	1030		

Client signature implies acceptance of LRS Terms and Conditions, which can be viewed online at www.lab-resource.com

Billing Information:

Laboratory Resources and Solutions, Inc.

P.O. Box 1260
205 6th Avenue
Ashville, Alabama 35953
(205) 594-1445



LRS Client Information:

Eastman Chemical Company

702 Clydesdale Avenue
Anniston, AL 36201

"Report to" Contact:

Ms. Heather Hollingsworth

Analysis/Container/Preservative

Chain of Custody
Page 1 of 1

Laboratory Resources and Solutions, Inc.

A Laboratory Service Provider



Laboratory:

Waypoint Analytical
2790 Whitten Road
Memphis, TN 38133

Project Name: Eastman Stormwater Renewal

City/State collected

Anniston, Alabama

Collected by: *Heather Hollingsworth*

Client Project # **AL0001201**

P.O. #

Collected by (signature)

Heather Hollingsworth

Project Turnaround (Begins on Lab Login Date)

RUSH? Please Notify LRS

Date Results Needed:

- Same Day (200%)
- Next Day (100%)
- Two Day (50%)
- Three Day (25%)

Number of Containers

Total Nitrate (NO3) E300.0 (One 250-mL HDPE, non-preserved)	Total Nitrite (NO2) E300.0	NO2/NO3 SM4500-NO3 (One 250-mL HDPE, H2SO4-preserved)	Total Cyanide SM4500-CN-E (One 250-mL HDPE, NaOH-pres.)	TSS SM2540D (One 500-mL HDPE, non-preserved)	TDS SM2540C	BOD SM5210 (One 1-liter HDPE, non-preserved)	Oil & Grease E1664 (One 1-liter amber glass, H2SO4-preserved)	COD SM5220 (One 500-mL HDPE, H2SO4-preserved)	TKN SM4500-Norg	Fe, Pb, Mn, Zn and Phos. E200.7 (One 250-mL HDPE, HNO3-pres)	Total VOCs E624.1 (Two 40-mL VOA vials, HCl-preserved)	Total SVOCs E625.1 (One 1-Liter amber glass, non-preserved)	PCBs E608 (One 1-liter amber glass, non-preserved)
-------------------------------------------------------------	----------------------------	-------------------------------------------------------	---------------------------------------------------------	----------------------------------------------	-------------	----------------------------------------------	---------------------------------------------------------------	-----------------------------------------------	-----------------	--------------------------------------------------------------	--------------------------------------------------------	-------------------------------------------------------------	----------------------------------------------------

Packed on Ice? N Y

Sample Information	Sample ID	Comp/Grab	Matrix	Depth	Date	Time	Number of Containers	Total Nitrate (NO3) E300.0	Total Nitrite (NO2) E300.0	NO2/NO3 SM4500-NO3	Total Cyanide SM4500-CN-E	TSS SM2540D	TDS SM2540C	BOD SM5210	Oil & Grease E1664	COD SM5220	TKN SM4500-Norg	Fe, Pb, Mn, Zn and Phos. E200.7	Total VOCs E624.1	Total SVOCs E625.1	PCBs E608	Sample Remarks	
		DSN012Q Composite	Comp	SW				3	X	X	X												
	DSN012Q - Grab	Grab	SW	*****	10/12/22	1:05 PM	12	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	

Matrix: SS - Soil/Solid GW - Groundwater WW - Wastewater SW - Surface Water DW - Drinking Water SLW - Solid Waste LQW - Liquid Waste
SOL - Solvent OI - Oil WI - Wipes PW - Process Water OT - Other (Describe) _____

pH _____ Temp _____

Project Remarks _____ Rainfall in Inches _____ Flow _____ Other _____

Custody info	Relinquished by (Signature)	Date	Time	Received by (Signature)	Date	Time	Condition (Lab use only)
	<i>Heather Hollingsworth</i>	10/12/22	2:10 PM	<i>A. Busby</i>	10/13/22	0931	
	Relinquished by (Signature)	Date	Time	Received by (Signature)	Date	Time	
	<i>A. Busby</i>	10-14-22	0845	<i>Sherry McKinney</i>	10-14-22	0845	
	Relinquished by (Signature)	Date	Time	Received by (Signature)	Date	Time	Bottles Received
							pH Checked
							NCF

Client signature implies acceptance of LRS Terms and Conditions, which can be viewed online at www.lab-resource.com



Laboratory Resources and Solutions, Inc.
A Full Service Analytical Laboratory Provider

PO Box 1260 / 205 6th Avenue
 Ashville, Alabama 35953
 Phone 205-594-1445 / Fax 205-594-1132
 www.lab-resource.com

Shipment Receipt Form

Customer Name: Eastman Chemical Company

Project Name: Eastman Chemical Stormwater_Renewal

LRS Work Order #: L-101422-08 (0809)

Shipment Method

LRS Client D.O. FedEx UPS US Postal Other:

Shipping Container/cooler compromised?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
Number of Coolers / Boxes received? <u>1</u>		Total Container Count? <u>2</u>	
Custody Seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input checked="" type="radio"/> Cooler / <input type="radio"/> Sample Temp upon receipt? <u>5.6°</u>		Thermometer ID: <u>70995</u>	
Sample(s) received at 0-6°C (or 0-8°C for BACT)	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Samples are considered acceptable as cooling process has begun?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Chain of Custody (CoC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
CoC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Collection times noted?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper container types?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample contains proper preservative?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Requested turn-around time on CoC?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Signature:

Sherry McKinney

Date/Time of Receipt:

10-14-22 @ 0845