

KAY IVEY GOVERNOR

## Alabama Department of Environmental Management adem.alabama.gov

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APRIL 8, 2024

MR. TERRY ELGIN MANAGING DIRECTOR ROBBINS HOLDINGS, INC. 3415 THOMPSON ST MUSCLE SHOALS, AL 35661

RE:

DRAFT PERMIT

NPDES PERMIT NUMBER AL0069931

Dear Mr. Elgin:

Transmitted herein is a draft of the referenced permitt.

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

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

Our records indicate that you 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 (<a href="https://prd.adem.alabama.gov/awp">https://prd.adem.alabama.gov/awp</a>) 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 Clint Dear by e-mail at clint.dear@adem.alabama.gov or by phone at (334) 271-7851.

Sincerely

Scott Ramsey, Chief Industrial/Municipal Branch Water Division

Enclosure:

**Draft Permit** 

pc via website:

Montgomery Field Office

**EPA Region IV** 

U.S. Fish & Wildlife Service AL Historical Commission

Advisory Council on Historic Preservation
Department of Conservation and Natural Resources

Birmingham Branch 110 Vulcan Road Birmingham, AL 35209-4702 (205) 942-6168 Decatur Branch 2715 Sandlin Road, S.W. Decatur, AL 35603-1333 (256) 353-1713 (256) 340-9359 (FAX)





**PERMITTEE:** 



# NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

ROBBINS HOLDINGS, INC.

FACILITY LOCATION:	ROBBINS, LLC 3415 THOMPSON ST MUSCLE SHOALS, ALABAMA 35661 COLBERT COUNTY
PERMIT NUMBER:	AL0069931
RECEIVING WATERS:	001 - UNNAMED TRIBUTARY TO SPRING CREEK
"FWPCA"), the Alabama Water Pollui the Alabama Environmental Managem	provisions of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §§1251-1388 (the tion Control Act, as amended, Code of Alabama 1975, §§ 22-22-1 to 22-22-14 (the "AWPCA") ent Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-17, and rules and regulations are to the terms and conditions set forth in this permit, the Permittee is hereby authorized to ring waters.
	DRAFT
	Alabama Department of Environmental Management

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# PART I: DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

#### A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

DSN 0011: Stormwater runoff, boiler blowdown, contact cooling water, and non-contact cooling water associated with the manufacture of rubber products.<sup>3</sup>

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from the outfall(s) listed above and described more fully in the Permittee's application. Such discharges shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration				Sample Frequency <sup>2</sup>	Sample Type <sup>1</sup>	Seasonal
Temperature, Water Deg. Fahrenheit (00011) Effluent Gross Value	****	****	****	****	****	86.0 Maximum Daily	deg F	Monthly	Grab	All Months
pH (00400) Effluent Gross Value	****	****	****	6.0 Minimum Daily	****	8.5 Maximum Daily	S.U.	Monthly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Monthly	Composite	All Months
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Monthly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	****	****	****	****	Monthly	Instantaneous	All Months
Chlorine, Total Residual (50060) See notes (1,2,5) Effluent Gross Value	****	****	****	****	0.011 Monthly Average	0.019 Maximum Daily	mg/l	Monthly	Grab	All Months
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Monthly	Composite	All Months

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

- 1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.
- 2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.
- 3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.
- 4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.
- 5/ A measurement of Total Residual Chlorine below 0.05 mg/L shall be considered in compliance with the permit limitations above and should be reported as NODI=B or \*B on the discharge monitoring reports.

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# PART I: DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

# A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

DSN 0011: Stormwater runoff, boiler blowdown, contact cooling water, and non-contact cooling water associated with the manufacture of rubber products. 3

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from the outfall(s) listed above and described more fully in the Permittee's application. Such discharges shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity o	Quantity or Loading		Quality or Concentration				Sample Frequency <sup>2</sup>	Sample Type <sup>1</sup>	Seasonal
Temperature, Water Deg. Fahrenheit (00011) Effluent Gross Value	****	****	****	****	****	86.0 Maximum Daily	deg F	Monthly	Grab	All Months
pH (00400) Effluent Gross Value	als als als als	****	****	6.0 Minimum Daily	****	8.5 Maximum Daily	S.U.	Monthly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Monthly	Composite	All Months
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Monthly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	**************************************	और और और और	ale ale ale ale	****	Monthly	Instantaneous	All Months
Chlorine, Total Residual (50060) See notes (1,2,5) Effluent Gross Value	*********	******	****	***	0.011 Monthly Average	0.019 Maximum Daily	mg/l	Monthly	Grab	All Months
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	<b>海 瀬 瀬 瀬</b>	****	****	****	***	(Report) Maximum Daily	mg/l	Monthly	Composite	All Months

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

- 1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.
- 2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.
- 3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.
- 4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.
- 5/ A measurement of Total Residual Chlorine below 0.05 mg/L shall be considered in compliance with the permit limitations above and should be reported as NODI=B or \*B on the discharge monitoring reports.

# DSN 001Q: Stormwater runoff, boiler blowdown, contact cooling water, and non-contact cooling water associated with the manufacture of rubber products. 3

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from the outfall(s) listed above and described more fully in the Permittee's application. Such discharges shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity	y or Loading	Units	Qual	Units	Sample Frequency <sup>2</sup>	Sample Type <sup>1</sup>	Seasonal		
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Instantaneous	All Months
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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

- 1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.
- 2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.
- 3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.
- 4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.
- 5/ Sample shall be collected during a qualifying storm event as defined in Part IV.B

#### DSN 01A1: Contact cooling water associated with the manufacture of rubber products.

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from the outfall(s) listed above and described more fully in the Permittee's application. Such discharges shall be limited and monitored by the Permittee as specified below:

Parameter	er Quantity or Loading Units Quality or Concentration		Quality or Concentration			Units	Sample Frequency <sup>2</sup>	Sample Type <sup>1</sup>	Seasonal	
pH (00400) Effluent Gross Value	****	****	****	6.0 Minimum Daily	****	9.0 Maximum Daily	S.U.	Weekly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	5.12 Monthly Average	10.24 Maximum Daily	lbs/day	****	****	********	****	Weekly	Composite	All Months
Oil & Grease (00556) Effluent Gross Value	2.0 Monthly Average	5.6 Maximum Daily	lbs/day	****	****	****	****	Weekly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	****	****	ate ate ate ate	****	Weekly	Instantaneous	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 MORE FREQUENTLY THAN MONTHLY AND MONTHLY TESTING shall be submitted on a monthly basis. The first report is due on the 28th day of (MONTH, YEAR). The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

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

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

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

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

- (1) If the permittee is unable to complete the electronic submittal of DMR data due to technical problems originating with the Department's electronic system (this could include entry/submittal issues with an entire set of DMRs or individual parameters), the permittee is not relieved of their obligation to submit DMR data to the Department by the date specified in Provision I.C.1.b, unless otherwise directed by the Department.
  - If the Department's electronic system is down on the 28th day of the month in which the DMR is due or is down for an extended period of time, as determined by the Department, when a DMR is required to be submitted, the permittee may submit the data in an alternate manner and format acceptable to the Department. Preapproved alternate acceptable methods include faxing, e-mailing, mailing, or hand-delivery of data such that they are received by the required reporting date. Within 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 335-6-6-0.09 or a "duly authorized representative" of such official as defined in ADEM Administrative Code Rule 335-6-6-0.09 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

 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:

- 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:
    - (i) one hundred micrograms per liter;
    - (ii) 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;
    - (iii) 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:

- (i) five hundred micrograms per liter;
- (ii) one milligram per liter for antimony;
- (iii) ten times the maximum concentration value reported for that pollutant in the permit application.

#### 3. Transfer of Permit

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

#### 4. Permit Modification and Revocation

- a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:
  - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;
  - (2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or
  - (3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.
- b. This permit may be modified during its term for cause, including but not limited to, the following:
  - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;
  - (2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;
  - (3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;
  - (4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;
  - (5) Errors in calculation of discharge limitations or typographical or clerical errors were made;
  - (6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;
  - (7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;
  - (8) To agree with a granted variance under 30l(c), 30l(g), 30l(h), 30l(k), or 3l6(a) of the FWPCA or for fundamentally different factors;
  - (9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;
  - (10) When required by the reopener conditions in this permit;
  - (11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);

- (12) Upon failure of the state to notify, as required by Section 402(b)(3) of the FWPCA, another state whose waters may be affected by a discharge permitted by this permit;
- (13) When required to correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions; or
- (14) When requested by the permittee and the Director determines that the modification has cause and will not result in a violation of federal or state law, regulations or rules.

#### 5. Permit Termination

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

- 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 <u>Code of Alabama</u> 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

- 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. <u>Daily discharge</u> 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. <u>Discharge</u> 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. <u>Discharge Monitoring Report (DMR)</u> 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. <u>Grab Sample</u> 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. <u>Indirect Distharger</u> means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.
- 25. <u>Industrial User</u> 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. <u>Permit application</u> means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.
- 31. <u>Point source</u> 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. <u>Pollutant</u> 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. <u>Privately Owned Treatment Works</u> 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. <u>Publicly Owned Treatment Works</u> 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. <u>Significant Source</u> 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. <u>Solvent</u> 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. <u>Upset</u> 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;
- 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, firefighting foams, 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;
- Provide control sufficient to prevent or control pollution of stormwater by soil particles to the degree required to maintain compliance with the water quality standard for turbidity applicable to the waterbody(s) receiving discharge(s) under this permit;
- m. Provide spill prevention, control, and/or management sufficient to prevent or minimize contaminated stormwater runoff.

  Any containment system used to implement this requirement shall be constructed of materials compatible with the

substance(s) contained and shall prevent the contamination of groundwater. The containment system shall also be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided;

- n. Provide and maintain curbing, diking or other means of isolating process areas to the extent necessary to allow segregation and collection for treatment of contaminated stormwater from process areas;
- o. Be reviewed by plant engineering staff and the plant manager; and
- p. Bear the signature of the plant manager.

# 3. Compliance Schedule

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

#### 4. Department Review

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

#### 5. Administrative Procedures

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

#### B. STORMWATER FLOW MEASUREMENT AND SAMPLING REQUIREMENTS

#### 1. Stormwater Flow Measurement

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

## 2. Stormwater Sampling

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

# C. 316(B) COOLING WATER INTAKE STRUCTURE REQUIREMENTS

1. The Department has determined that the Clean Water Act section 316(b) regulations are not applicable.

#### ADEM PERMIT RATIONALE

PREPARED DATE: March 6, 2024

PREPARED BY: Clint Dear

Permittee Name: Robbins Holdings, Inc.

Facility Name: Robbins, LLC

Permit Number: AL0069931

#### PERMIT IS A REISSUANCE DUE TO EXPIRATION

#### DISCHARGE SERIAL NUMBERS (DSN) & DESCRIPTIONS:

DSN	Description
001	Stormwater runoff, boiler blowdown, contact cooling water, and non-contact cooling water associated with the manufacture of rubber products.
01A	Contact cooling water associated with the manufacture of rubber products.

Unnamed Tributary of Spring Creek

INDUSTRIAL CATEGORY: 40 CFR Part 428 – Subpart E

MAJOR: No

#### STREAM INFORMATION:

Impairment:

Receiving Stream:

Classification: Fish & Wildlife
River Basin: Tennessee
7Q10: 0 cfs
7Q2: 0 cfs
1Q10: 0 cfs
Annual Average Flow: 0 cfs
303(d) List: No

No

TMDL: No

#### DISCUSSION:

The facility produces extruded rubber and polymer products for use in the molded rubber industry. The facility has previously been required to conduct a hydrologic evaluation of the facility discharge pond. The evaluation determined that waters discharged into the pond are ultimately discharged into Spring Creek. Since the pond is not utilized as a treatment unit, the facility has historically shown compliance with permit limitations prior to discharging into the pond.

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.

DSN 0011: Stormwater runoff, boiler blowdown, contact cooling water, and non-contact cooling water associated with the manufacture of rubber products.

Parameter	Quantity of	r Loading	Units Quality or Concentration				Units	Sample Freq	Sample Type	Seasonal	Basis
Temperature, Water Deg. Fahrenheit (00011) Effluent Gross Value	nde nde nde nde	nje nje nje nje	****	वोट वोह वोट वोट	afe afe afe afe	86.0 Maximum Daily	deg F	Monthly	Grab	All Months	WQBEL
pH (00400) Effluent Gross Value	****	****	****	6.0 Minimum Daily	****	8.5 Maximum Daily	S.U.	Monthly	Grab	All Months	WQBEL
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Monthly	Composite	All Months	ВРЈ
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Monthly	Grab	All Months	ВРЈ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	वर्षः वर्षः वर्षः वर्षः वर्षः	****	***	****	Monthly	Instantaneo us	All Months	ВРЈ
Chlorine, Total Residual (50060) See notes (1,2) Effluent Gross Value	ale ale ale ale ale	विद्यान्त्रित विद्यान्त्रित विद्यान्त्रित	ale ale ale ale ale	spic spic spic spic spic	0.011 Monthly Average	0.019 Maximum Daily	mg/l	Monthly	Grab	All Months	WQBEL
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	ale ale ale ale	****	****	***	***	(Report) Maximum Daily	mg/l	Monthly	Composite	All Months	ВРЈ

# DSN 001Q: Stormwater runoff, boiler blowdown, contact cooling water, and non-contact cooling water associated with the manufacture of rubber products.

Parameter	Quantity	ty or Loading Units Quality or Concentration				Units	Sample Freq	Sample Type	Seasonal	Basis	
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	ВРЈ
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months	ВРЈ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	<b>************************************</b>	****	Quarterly	Instantaneo us	All Months	ВРЈ
Chemical Oxygen Demand (COD) \$1017) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	ВРЈ

DSN 01A1: Contact cooling water associated with the manufacture of rubber products.

Parameter	Quantity or Loading		Units	Qua	lity or Concentrat	Units	Sample Freq	Sample Type	Seasonal	Basis	
pH (00400) Effluent Gross Value	****	****	*****	6.0 Minimum Daily	****	9.0 Maximum Daily	S.U.	Weekly	Grab	All Months	ELG
Solids, Total Suspended (00530) Effluent Gross Value	5.12 Monthly Average	10.24 Maximum Daily	lbs/day	****	****	****	****	Weekly	Composite	All Months	ELG
Oil & Grease (00556) Effluent Gross Value	2.0 Monthly Average	5.6 Maximum Daily	lbs/day	****	****	****	****	Weekly	Grab	All Months	ELG
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	****	****	****	****	Weekly	Instantaneo us	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

Stormwater runoff, boiler blowdown, contact cooling water, and non-contact cooling water are discharged into a settling pond on the facility property which has been determined to ultimately discharge into Spring Creek via an unnamed tributary. Outfall DSN001 is monitored after comingling of all wastestreams but prior to discharge into the pond since the pond is not utilized as a treatment unit and is an unnamed tributary of Spring Creek. The 001Q sample should be collected during a qualifying storm event as defined by permit condition Part IV.B.

#### Best Professional Judgment (BPJ)

The parameters of concern for this facility are based on the parameters of concern listed in the permit application, 40 CFR Part 428 – Subpart E, 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.

#### 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.

#### Whole Effluent Toxicity (Cooling Water and Boiler Water Additives)

The discharge of biocides and corrosion infinitions with non-process wastewaters (e.g. cooling tower blowdown, etc.) can introduce the potential for toxicity in receiving waters. The facility is expected to verify that the use of these chemicals will not present potential toxic affects to representative organisms in the receiving waters and to ensure that the chemicals are used in a manner that is consistent with their labeling and standard industry practices. Monitoring for Whole Effluent Toxicity is not proposed to be included in this permit issuance based on the use of the chemicals specified in the permit application; however, the permittee should refer to Part I.D.5 of the permit for further requirements regarding Cooling Water and Boiler Water Additives.

#### Naphthalene, Benzene, Toluene, Ethylbenzene, and Xylene

Monitoring for naphthalene, benzene, toluene, ethylbenzene, and xylene will be removed due to the waste oil above ground storage tanks being empty and oil is no longer being stored.

#### **Total Organic Carbon (TOC)**

The previous permit version imposed a monitoring requirement for Total Organic Carbon. The analytical data submitted by the Permittee and Discharge Monitoring Reports (DMRs) submitted by the Permittee to the Department for Robbins, LLC from April 2019 to April 2024 indicates that the outfall does not discharge this pollutant in significant concentrations. As a result, the daily maximum limitation for Total Organic Carbon is no longer required and will be removed from this permit version.

#### Flow, In Conduit or Thru Treatment Plant

The sample type for the Flow, In Conduit or Thru Treatment Plant is being changed from Totalizer to Instantaneous due to the nature of the discharge of the facility.

#### E.Coli

The Permittee took two in-pond grab samples for Fecal Coliform with a reported result of 17300 MPN/100 mL (October 19, 2023) and 3650 MPN/100 mL (October 20, 2023). The Permittee indicated that the high reported value was due to wildlife contamination in the area that the sample was obtained. On February 15, 2024, the Permittee took a grab sample before it reached the original sample location and reported the value as 10 MPN/ 100 mL. The Department does not consider discharges from a regulated activity of this type to be a contributor of E. Coli. Therefore, additional limitations related to E. Coli are not imposed.

#### Water Quality Based Effluent Limits (WQBEL)

The Department completed a reasonable potential analysis (RPA) of the discharge based on the effluent data provided in the Permittee's application. The RPA indicates whether pollutants in the treated effluent have the potential to contribute to excursions of Alabama's in-stream water quality standards. There was no background data available for use in the RPA. Based on the analysis, no parameters have shown a reasonable potential.

#### pH

ADEM Administrative Code, Division 6 Regulations, specifically 335-6-10-.09(5) – Specific Water Quality for Fish and Wildlife classified streams states: "Sewage, industrial waste or other wastes shall not cause the pH to deviate more than one unit from the normal or natural pH, nor be less than 6.0, nor greater than 8.5 standard units."

#### **Temperature**

ADEM Administrative Code, Division 6 Regulations, specifically 335-6-10-.09(5) – Specific Water Quality for Fish & Wildlife classified streams states: "the maximum temperature rise above natural temperatures due to the addition of artificial heat shall not exceed 5 °F in streams, lakes, and reservoirs." Additionally, the maximum water temperature shall not exceed 86 °F in the Tennessee River Basin.

#### **Total Residual Chlorine**

Total Residual Chlorine (TRC) limitations will be imposed due to the use of chlorinated city water. The TRC limitations are based on the United States Environmental Protection Agency's (EPA) recommended water quality standard. In accordance with a letter dated August 11, 1998 from EPA Headquarters and a 1991 memorandum from EPA Region 4's Environmental Services Division (ESD), due to testing and method detection limitations, a Total Residual Chlorine measurement below 0.05 mg/L shall be considered below detection for compliance purposes.

#### Federal Effluent Guideline Limitations (EGL)

Parameters based upon EGL have had effluent guidelines established under 40 CFR 428 Subpart E. The categorical guideline limitations are applied at internal Outfall 01A1. The facility does not produce lead-sheathed hose as defined by the guideline. The proposed limits are:

#### Oil and Grease

Daily Maximum: 8,000 lbs of raw materials x 0.70 lbs per 1000 lbs of raw materials = 5.6 lbs/day
Monthly Average: 8,000 lbs of raw materials x 0.25 lbs per 1000 lbs of raw materials = 2 lbs/day

#### **Total Suspended Solids**

Daily Maximum: 8,000 lbs of raw materials x 1.28 lbs per 1000 lbs of raw materials = 10.24 lbs/day
Monthly Average: 8,000 lbs of raw materials x 0.64 lbs per 1000 lbs of raw materials = 5.12 lbs/day

#### pH

The EGL sets limits on the pH of categorical wastewater discharged.

#### 316(b) Cooling Water Intake Structure Requirements

The Department has determined that the 316(b) regulations are not applicable to the facility because the Permittee obtains cooling water from private wells. The facility extracts approximately 0.460 MGD from four on-site wells which are pumped into the same water system. The Permittee also obtains water from the City of Muscle Shoals for sanitary uses and fire suppression.

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.

NPDES No.: AL0069931

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14	Zinc** Cyanide		Metals	0	0		4	.0	0	0.330
16			Metals Metals	0	0	· Salestana		0		***************************************
18	Acrolein Acrylonitrile*	YES	VOC	0	0		TOTAL STATE	0	0	*********
20	Aldrin	YES	VOC	0	0	20020 A	ellerene Muser grande	0	0	
22	Brumoform*	YES	VOC	0	0	1	Comments of the Comments of th	0	ő	
24	Chlordane	YES	VOC	0	0	1110000000		.0	0	#
26		YES	VOC	0	0	arren ass.	200	0	0	**************************************
28	2-Chloro-Ethylvinyl Ether Chloro-Form*	YES	VOC	0	0	TANGET A	STATE AND STATES	.0	0	
30	4,4'-DDD	YES	VOC	0	0	, No. 2	200	0	<u>6</u>	
32	4.4'-DDT	YES	VOC	0	0	Confidential Production	di, e jamer roce i goden	0		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
34	1, 1-Dichloroethane		VOC	0	0	TO DESCRIPTION OF THE PARTY.	erapy Paus as est of cross	0	0	
35 36	Trans-1, 2-Dichloro-Ethylene	YES	VOC	0	0	TANKS COME	THE REAL PROPERTY.	0	0	
37 38 39		YES	VOC	0	0	100	Spanish (1970) School (1973)	0	0	
40	Dieldrin	YES	VOC	0	0	//2.00**) 		0.	0	2000 00
42			VOC	0	0	CONTRACTOR OF		0	0	*****
43	Methylene Chloride*	YES	VOC	0	0	and the same of	21 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	.0	0	
45 46	Tetrachioro-Ethylene*	YES	VOC	0	0	200	2000	0	0	
	Toxaphene	YES	VOC	0	0	- Salas Carata	in the second	0	.0	
49 50	1, 1, 1-Trichloroethane	YES	AOC	0	0			0	0	
	Tricklorethylene*	YES	VOC	0	0	omities -	inate datase s	9.0	.0	
53 54	P-Chloro-M-Cresol	AEZ	VOC Acids	0	0		0	0	0	
56	2-Chlorophenol 2, 4-Otchlorophenol		Acids Acids	0	0	en in Paris es	9	.0	0	*
	2, 4-Dimethylphenol 4, 6-Dinitro-O-Cresol		Acids Acids	0	0	7 d. 3 cm. 200	agambara sa	0	0	
59 60	2, 4-Dintrophenol 4,6-Dintro-2-methylophenol	YES	Acids Acids	0	0		9	0	0	
61 62	Dioxin (2,3,7,8-TCDD) 2-Nitrophenol	YES	Acids Acids	0	0	Sayon Barrier	200200 12200 1	0	,0, ,0	
63 64		YES	Acids Acids	0	0	ratus ar	Annal Control of	0	0	, ,,,,,,
65 66	Phenol  2, 4, 6-Trichlorophenol	YES	Acids Acids	0	0			0	0	
67 68	Acenaphthene		Bases Bases	0	0	0	28	0	.0	******
69 70			Bases Bases	0	0			9.	0	
71 72		HES	Bases Bases	0	0	A11 1 12 12 12 12 12 12 12 12 12 12 12 12	9	0	. 0	:
73 74	3, 4 Benzo-Ruoranthene Benzo(GHI)Perylene		Bases Bases	0	0	1000 ×	0	0	0.0	
75 76			Bases Bases	0	0	Cook Prince	ne 👌 in	9	0	
77 78	Bis (2-Chloroethyl)-Ether* Bis (2-Chloroiso-Propyl) Ether	YES	Bases Bases	0	0			0	0	
	Bis (2-Ethylhexyl) Phthalate* 4-Bromophenyl Phenyl Ether	YES	Bases Bases	0	0		- เรียนสมาชานการ รายนสมาชาน สมาช	.0.	0.	0 0 0
82	Butyl Benzyl Phthalate 2-Chloronaphthalene		Bases Bases	0	0	-Property Leden.S.		0	0	
84	4-Chlorophenyl Phenyl Ether Chrysene*	YES	Bases Bases	0	0	cout frame	on the street	0	0	- 1
86	DI-N-Butyl Phthalate DI-N-Octyl Phthalate		Bases Bases	0	0		republican	0	0	*********
88	Dibenzo(A,H)Anthracene*  1, 2-Okhloroberzene  1, 2-Dkhloroberzene	YES	Bases Bases	0	Ω 0		control organic	0	0	:
09	1, 3-Dictionostizere		Bases Bases	0	0	ar dram.	ACCOUNT OF THE PARTY.	0	0	
92	1, 4-Dichlorobenzene 3, 3-Oichlorobenzidine* Diethyl Phthalate	HES	Bases Bases	0	0			0	0	
94	2, 4-Dinitrotoluene®	YES	Bases Bases		0			0	.0	
96	1.2-Diphenylhydrazine		Bases Bases	0	0		constitution of	0.0	0	
96	Endosulfan (beta)	HEZ	Bases Bases	0	0	-17301   177   177   170	April Particle	.0.	0	
100	Endosulfan sulfate	YES	Bases Bases	0	0	Day Carpan	Total Capter	.0.	.0	
102	Endrin Alderhide Fluoranthene	HES	Bases Bases	0	0			. 0	0	
103	Fluorene Heptochlor	YES	Bases Bases	0	0	ALTERNATION (C.)		9.	0	
100	Heptachlor Epoxide	YES	Bases Bases	0	0		ő	0		
108	Hexachiorobutadiene* Hexachiorocyclohexan (alpa)	YES	Bases Bases	0	0	n marketical	200000000000000000000000000000000000000	, b		
109	Hexachlorocyclohexan (beta) Hexachlorocyclohexan (gamma)	YES	Bases Bases	0	0			0	and and and	
111	HexachiorocycloPentadiene	10 5000	Bases Bases	0	0	Delita de la constitución de la				******
113	Indeno(1, 2, 3-CK)Pyrene*	YES	Bases Bases	0	0				0	
115	Naphthalene Nitrobenzene		Bases Bases	0	0					
117	N-Nitrosodi-N-Propylamine*	YES	Bases Bases	0	9				9	
119	N-Nitrogodi-N-Phenylamine*	YES	Bases Bases	0	0		20 607	.0	0	***************************************
121	PC8-1221	AE2	Bases Bases	0	0	2,200	Same areas	0		
123	PCB-1242 PCB-1242 PCB-1248	YES YES	Bases Bases	0	0			0		
	PCB-1254 PCB-1260	YES	Bases Bases		0			0	.0	
127	Phenanthrene	AEZ	Bases Bases		0	Confidence of	2723230 (2553) 22 (25727)	0	0	
128	Pyrene		Dases			PRINCES.	The property	0	0	

0.578	Enter Q <sub>d</sub> = wastewater discharge flow from facility (MGD)
0.89429836	$Q_d$ = wastewater discharge flow (cfs) (this value is caluclated from the MGD)
0	Enter flow from upstream discharge Qd2 = beckground stream flow in MGD above point of discharge
0	Qd2 = background stream flow from upstream source (cfs)
0	Enter 7010, Q <sub>e</sub> = background stream flow in cfs above point of discharge
0	Enter or estimated, 1Q10, Q <sub>e</sub> = background stream flow in cfs above point of discharge (1Q10 estimated at 75% of 7Q10)
0	Enter Mean Annual Flow, Q <sub>e</sub> = background stream flow in cfs above point of discharge
٥	Enter 7Q2, Q <sub>6</sub> = beckground stream flow in cfs above point of discharge (For LWF class streams)
Enter in	Enter $C_a$ = background in-stream pollutant concentration in µg/l (assuming this is zero "0" unless there is data)
Q <sub>d</sub> +Qd2+Q <sub>s</sub>	Q, = resultant in-stream Sow, after discharge
Calculated on other	C, = resultant in-stream pollutant concentration in µg/l in the stream (after complete mixing occurs)
100.00	Enter, Background Hardness above point of discharge (assumed 50 South of Birmingham and 100 North of Birmingham)
7.00 s.u.	Enter, Background pH above point of discharge
yes	Enter, is discharge to a stream? "YES" Other option would be to a Lake. (This changes the partition coefficients for the metals)

<sup>\*\*</sup> Using Partition Coefficients

March 8, 2024

of contribution.				Freetwater Acute (Jupit) Q <sub>a</sub> =1C10						Treatment Change paylics, in them,				Section Control of the Control of th			
D Pollutont	RP?	a 2 HOLDING COME	Contage of specially Applicati (Cont	Water Charles	Dreft Permit	SINS of Deal Person Shork	RPT	Designment, Juny (princes) person (Califo		Water	Stufffeed United	1005 of Final Franksion	RP?	**************************************	Total Front	95.454	
1 Antimony		Daily Man	0					Manage Re-	0	- American	-			The said	3.73E+02	7.47E+01	
2 Areenic 3 Berylium 4 Cadmium	YE	0	0	California.	592.334 8.533	118.487	No No	0	0	THUNK!	1.042	0.208	No	0.30	0.30	0.06	
6 Chromium/ Chromium III 6 Chromium/ Chromium VI 7 Copper		0	0		2713.159 16.000 34.637	542.632 3.200 6.927	No No	0	0	E I	352.926 11.000 23.082	70.585 2.200 4.616	No No				
8 Lead 9 Mercury		0	0	# 11 1 1 2 24 1 1 2	313.502 2.400	62.700 0.480	No No	0	0		12.217	2.443	No No	0.0424	0.0424	0.0085	
10 Nickel 11 Selenium		0	0	□ 1/1 = 13     □ 1/1 ≥     □ 1/1	927.200 20.000	185.440 4.000	No No	0	0	# 1 	102.983 5.000	20.597 1.000	No No	9.93E+02	9.93E+02 2.43E+03	1.99E+02 4.66E+02	
12 Silver 13 Thallium 14 Zinc		0	0		3.217	71.018	No No	0	0		357.997	71.599	No	1.49E+04	0.27 1.49E+04	0.05 2.98E+03	
15 Cyanide 16 Total Phenolic Compounds		0	0		22.000	4.400	No	0	0		5.200	1.040	No		9.33E+03	1.87E+03	
17 Hardness (As CaCO3) 18 Acrolein		0 0 8	0	**************************************				0	0				÷	A	5.43E+00	1.09E+00	
19 Acrylonitrile 20 Aldrin 21 Benzene	YE YE	8 0	0		3.000	0.600	No	0	0						1.44E-01 2.94E-05 1.55E+01	2.88E-02 5.88E-06 3.09E+00	
22 Bromoform 23 Carbon Tetrachloride	YE	8 0	0				:	0	0		-				7.88E+01 9.57E-01	1.58E+01 1.91E-01	
24 Chlordane 25 Clorobenzene	YE	0	0		2.400	0.480	No_	0	.0		0.004	0.001	No		4.73E-04 9.06E+02	9.48E-05 1.81E+02	
26 Chlorodibromo-Methane 27 Chloroethane 28 2-Chloro-Ethylvinyl Ether	YE	0 0	0					0	0		**************************************	***************************************	1		7.41E+00	1.48E+00	
29 ChloroForm 30 4,4' - DOO	YE YE	8 0	0					0	0			ļ		E SILL A	1.02E+02 1.81E-04	2.04E+01 3.63E-05	
31 4,4' - DDE 32 4,4' - DDT	YE	8 0	- 0	1.100	1.100	0.220	No	0	0	0.001	0.001	0.000	No		1.28E-04 1.28E-04	2.56E-05 2.56E-05	
33 Dichlorobromo-Methane 34 1, 1-Dichloroethane 35 1, 2-Dichloroethane	YE	0	0	***************************************				0.	00	* ****				DUE OF	1.00E+01 2.14E+01	2.01E+00 4.27E+00	
36 Trans-1, 2-Dichloro-Ethylene 37 1, 1-Dichloroethylene	YE	0	0	- Water 1997	*			0	0		-				5.91E+03 4.17E+03	4.27E+00 1.16E+03 8.33E+02	
8 1, 2-Dichloropropane 9 1, 3-Dichloro-Propylene	1	0	0	: .				0	0						8.49E+00 1.23E+01	1.70E+00 2.46E+00	
Dieldrin II Ethylbenzene	YE	0	0		0.240	0,048	No	0	0		0.056	0.011	No		3.12E-05 1.24E+03	8.25E-06 2.49E+02	
12 Methyl Bromide 13 Methyl Chloride 14 Methylene Chloride	YE	0 0 8	0	***************************************		***************************************		0	0		**************************************	***************************************	J		8.71E+02	1.74E+02 6.91E+01	
15 1, 1, 2, 2-Tetrachloro-Ethane 16 Tetrachloro-Ethylene	YE	8 0	0	w			******	0	0						3.48E+02 2.33E+00 1.92E+00	4.67E-01 3.83E-01	
7 Toluene 8 Toxaphene	YE	o o	0	60.20	0.730	0.146	No	0	0		0.000	0.000	No		8.72E+03 1.62E-04	1.74E+03 3.24E-05	
9 Tributyttn (TBT) 0 1, 1, 1-Trichloroethane	YE	0	0	BARK	0.460	0.002	No	0	0		0.072	0.014	No				
1 1, 1, 2-Trichloroethane Trichlorethylene 3 Vinyl Chloride	YE YE	8 0	0	***************************************	***************************************			0	0		4		-	E1 : - (1)   W	9.10E+00 1.75E+01 1.42E+00	1.82E+00 3.49E+00 2.85E-01	
4 P-Chloro-M-Cresol 5 2-Chlorophenol	1 "	0	0	Varganer H	***************************************			0	0			***************************************			8.71E+01	1.74E+01	
6 2, 4-Dichiorophenol 7 2, 4-Dimethylphenol		0	0	***************************************				0	0		*	***********			1.72E+02 4.98E+02	3.44E+01 9.95E+01	
8 4, 6-Dinitro-O-Cresol 9 2, 4-Dinitrophenol		0 0	0	***************************************				0	0		***************************************	promises	•		3.11E+03	6.22E+02	
0 4,6-Dinitro-2-methylphenol 1 Dioxin (2,3,7,8-TCDD) 2 2-Nitrophenol	YE		0		***************************************			0	0						1.65E+02 2.67E-08	3.31E+01 5.33E-09	
3 4-Nitrophenol 4 Pentachiorophenol	YE	0	0	C3098CS	8.723	1.746	No	0	0	(Cataoles)	6.693	1.339	No.		1.77E+00	3.54E-01	
5 Phenol 6 2, 4, 6-Trichlorophenol	YE		0	* ******			- 1	0	.0			ļ	1	2 41	5.00E+05 1.41E+00	1.00E+05 2.83E-01	
7 Acenaphthene 8 Acenaphthylene 9 Anthracene		0	0	***************************************		40.000 00.000	a	0	0			******	:		5.79E+02 2.33E+04	1.16E+02 4.67E+03	
0 Benzidine 1 Benzo(A)Anthracene	YE	0	0		***************************************	***************************************		0	0	~~~~~		ļ	-:-		1.16E-04 1.07E-02	2.32E-05 2.13E-03	
2 Benzo(A)Pyrene 3 Benzo(b)fluoranthene	YE		0	***************************************	9	-	-	0	0	*	*			E INSTALL	1.07E-02 1.07E-02	2.13E-03 2.13E-03	
4 Benzo(GHI)Perylene 5 Benzo(K)Fluoranthene	****	0	0					0	0	*	*	-	:	SHIP IN	1.07E-02	2.13E-03	
6 Bis (2-Chicroethoxy) Methane 7 Bis (2-Chicroethyl)-Ether 8 Bis (2-Chicroiso-Propyl) Ether	YE	9 0	0	***************************************				0	0						3.07E-01 3.78E+04	8.15E-02 7.58E+03	
9 Bis (2-Ethylhexyl) Phthalate 0 4-Bromopheryl Phenyl Ether	YE		0				-	0	0			**************************************	1	= Comments	1.28E+00	2.56E-01	
1 Butyl Benzyl Phthalate 2 2-Chloronaphthalene		0	0				- :	0	0					# 1 × 1	1.13E+03 9.24E+02	2.25E+02 1.85E+02	
4 -Chicrophenyl Phenyl Ether Chrysene 5 Di-N-Butyl Phthelete	YE	8 0	0	***************************************				0	0	***************************************			:	- n -	1.07E-02 2.82E+03	2.13E-03 5.24E+02	
6 DI-N-Octyl Phthalate 7 Dibenzo(A,H)Anthracene	YE	8 0	0					0	0					L. Marine	1.07E-02	2.13E-03	
3 1, 2-Oichlorobenzene 9 1, 3-Dichlorobenzene		0	0					0	0					- I	7.55E+02 5.62E+02	1.51E+02 1.12E+02	
1 1, 4-Dichlorobenzene 1 3, 3-Dichlorobenzidine 2 Diethyl Phthalate	YE	S 0	0		# # # #			0	0			***************************************			1.12E+02 1.66E-02 2.56E+04	2.25E+01 3.32E-03 5.11E+03	
3 Dimethyl Phthelate 4 2, 4-Dinitrololuene	YE	0	0				-	0	0		***************************************			N H	6.48E+05 1.98E+00	1.30E+05 3.96E-01	
5 2, 6-Dinitrotoluene 3 1,2-Diphenythydrazine		0	0	***************************************				0	0	and the same of th				<b>E</b> N	1.17E-01	2.34E-02	
Endoeulfan (alpha) Endoeulfan (beta) Endoeulfan eulfate	YE YE	8 0	0		0.220 0.220	0.044	No	0	0		0.056	0.011	No No		5.19E+01 5.19E+01 5.19E+01	1.04E+01 1.04E+01 1.04E+01	
D Endrin 1 Endrin Aldeyhde	YE	8 0	0		0.086	0.017	No	0	0		0.036	0.007	No	E TERRITOR	3.53E-02 1.76E-01	7.05E-03 3.53E-02	
2 Fluoranthene 3 Fluorene		0	0					0	0					Water Dirk	8.12E+01 3.11E+03	1.62E+01 8.22E+02	
4 Heptochlor 5 Heptachlor Epcadde	YE YE	S 0	0	#   f  >    =	0.520 0.520	0.104	No No	0	0	Bellinnin. Bellinnin	0.004	0.001	No No		4.63E-05 2.29E-05 1.68E-04	9.26E-06 4.58E-08 3.36E-05	
6 Hexachlorobutadiene 7 Hexachlorobutadiene 8 Hexachlorocyclohexan (alpha)	YE YE	8 0	0			,	:	0	0						1,06E+01 2.85E-03	2.15E+00 5.70E-04	
9 Hexachlorocyclohexan (beta) 0 Hexachlorocyclohexan (gemma)	YE YE	S 0 S 0		Nat 7 Tal	0.950	0.190	No	0	0						9.97E-03 1.08E+00	1.99E-03 2.15E-01	
1 HexachlorocycloPentadiene 2 Hexachloroethane		0	0				:	0	0					A	8.45E+02 1.92E+00	1.29E+02 3.84E-01	
3 Indeno(1, 2, 3-CK)Pyrene 4 Isophorone	YE	0	0					0	0	**************	*****************				1.07E-02 5.61E+02	2.13E-03 1.12E+02	
5 Nephthalene 6 Nitrobenzene 7 N-Nitroeodi-N-Propytamine	YE	0 0	0					0	0	. :		,		Manager 2	4.04E+02 2.95E-01	8.07E+01 5.90E-02	
8 N-Nitrosodimethylamine 9 N-Nitrosodiphenylamine	YE	S 0 S 0	0	*,				0	0	/				Major (III M a) II II II II I	1.76E+00 3.50E+00	3.52E-01 7.00E-01	
0 PC8-1016 1 PC8-1221	YE	S 0 S 0	0	**************************************			-	0	0		0.014	0.003	No No	4.77	3.74E-05 3.74E-05	7.48E-06 7.48E-06 7.48E-06	
22 PCB-1232 23 PCB-1242 24 PCB-1248	YE YE	8 0	0				: :	0	0	AND INC.	0.014 0.014 0.014	0.003 0.003 0.003	No No	SECTION AND ADDRESS.	3.74E-05 3.74E-05 3.74E-05	7.48E-06 7.48E-08 7.48E-08	
24 PCB-1248 25 PCB-1254 26 PCB-1260	YE YE	9 0	0					0	0		0.014	0.003	No No	±1/m = 1	3.74E-05 3.74E-05	7.48E-06 7.48E-06	
Phenanthrene Pyrane		0 0	0			-		0	0					Marina	2.33E+03	4.67E+02	
9 1, 2, 4-Trichlorobenzene		Ō	0		-		-	0	o		-	-		4.09E+01	4.09E+01	8.19E+00	

# NPDES/SID Permit Fee Sheet

Permit Number: AL0069931

Permittee: Robbins Holdings, Inc.

Site: Robbins Holdings, Inc.

County: Colbert

Submission Reference Number: HPX-2E2B-WFFAK

Submission Received Date 11/27/2023
Assigned Staff: Clint Dear

Total Charges: \$5615.00
Totals Payments: \$5615.00

Amount Due: \$0.00

# Charges

Туре	Amount
Base Charge: NPDES Individual Permit	
Mod/Reissue (Form 187) - Supplementary	\$5615.00
Information for Industrial Facilities: ;	

# **Payments**

Туре	Amount	Date	Check/Payment Confirmation Number
Payment	\$5615.00	11/27/2023	96646646

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

Digitally signed by: AEPACS Date: 2023.11.27 08:31:48 -06:00 Reason: Submission Data Location: State of Alabama

version 2.8

(Submission #: HPX-2E2B-WFFAK, version 1)

#### **Details**

Submission ID HPX-2E2B-WFFAK

# Form Input

#### **General Instructions**

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

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

#### Applicable Base Fees:

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

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

# **Processing Information**

#### **Purpose of Application**

Reissuance of Permit Due to Approaching Expiration

Please indicate if the Permittee is applying for a permit transfer and/or name change in addition to permit modification or reissuance:

None

#### **Action Type**

Reissuance

11/27/2023 8:31:48 AM Page 1 of 11

If applicable, briefly describe any planned changes at the facility that are included in this reissuance application: NONE PROVIDED

#### General Information

SID Permit Number (if your facility currently holds an SID permit, please provide that number below): NONE PROVIDED

NPDES or General Permit Numbers (if applicable, please list all permit numbers): AL0069931

Is this facility/site only applying for permit coverage for discharges from stormwater?

Is a new stormwater outfall being added? No

#### Permit Information

**Permit Number** 

AL0069931

**Current Permittee Name** 

Robbins Holdings, Inc.

#### Permittee

Permittee Name

Robbins Holdings, Inc.

**Mailing Address** 

3415 Thompson Street

MUSCLE SHOALS, AL 35661

Per ADEM Admin. Code r. 335-6-6-.09 (1), a Responsible Official is defined as CEO, President, any position at a level of Vice President or higher, Owner, Partner, Managing Member (LLC), or ranking elected official. Please provide the contact information for the person meeting this definition.

Do NOT enter information for a person that is/will be a Duly Authorized Representative (DAR) (i.e. a person that has been delegated signatory permissions by a Responsible Official). A person that is a Duly Authorized Representative is NOT considered a RESPONSIBLE OFFICIAL.

#### Responsible Official

**Prefix** 

Mr.

First Name

Last Name

Terry

Elgin

Managing Director

**Organization Name** 

Robbins Holdings, Inc.

Phone Type Number

Extension

Business

2563835441

**Email** 

terry.elgin@hexpol.com

**Mailing Address** 

3415 THOMPSON ST

MUSCLE SHOALS, AL 35661

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Does the Responsible Official intend to delegate signatory authority for DMRs or other compliance reports to an individual as a duly authorized representative (DAR) for this site?

**Existing Permit Contacts** 

Affiliation Type	Contact Information	Remove?	
Permittee	Robbins Holdings, Inc.	Keep	
Environmental Contact, Notification Recipient, Responsible Official, DMR Contact	Terry Elgin, Robbins Holdings, Inc.	Keep	

# Facility/Site Information

#### Facility/Site Name

Robbins, LLC

#### Organization/Ownership Type

Corporation

#### Facility/Site Address or Location Description

3415 THOMPSON ST

MUSCLE SHOALS, AL 35661

#### Facility/Site County

Colbert

#### **Detailed Directions to the Facility/Site**

Travel south on Woodward Avenue/US43 in Muscle Shoals, AL until you reach 6th Street. Turn right onto 6th Street and travel west until you reach Thompson Street just past the railroad tracks. Turn left onto Thompson Street and travel south until you reach the facility at 3415 Thompson Street on the left.

#### **Facility Map**

Robbins - 2023 - Site Map (Form 2F).pdf - 11/10/2023 02:29 PM

Comment

NONE PROVIDED

#### Please refer to the link below for Lat/Long map instruction help:

Map Instruction Help

#### Facility/Site Front Gate Latitude and Longitude

34.726635407587295,-87.67260434365964

3415 Thompson Street, Muscle Shoals, AL

# SIC Code(s) [Please enter Primary SIC Code first followed by any additional applicable SIC Codes] 3069-Fabricated Rubber Products

NAICS Code(s) [Please enter Primary NAICS Code first followed by any additional applicable NAICS Codes] 326299-All Other Rubber Product Manufacturing

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Facility/Site Contact

**Prefix** 

Mr.

First Name Last Name Terry Elgin

Title

Managing Director

Organization Name

Robbins Holdings, Inc.

Phone Type Number Extension

Business

2563835441

**Email** 

terry.elgin@hexpol.com

**Address** 

3415 THOMPSON ST

MUSCLE SHOALS, AL 35661

# DMR Contact(s) (1 of 1)

#### **DMR Contact**

**Prefix** 

Mr.

First Name Last Name Terry Elgin

Title

Managing Director

Phone Type Number Extension

Business 2563835441

Email

terry.elgin@hexpol.com

**Address** 

3415 THOMPSON ST

MUSCLE SHOALS, AL 35661

# **Applicant Business Entity Information**

Address of Incorporation

3415 Thompson Street, Muscle Shoals, AL 35661

Agent Designated by the Corporation for Purposes of Service

Name	Address	
Terry Elgin	3415 Thompson Street, Muscle Shoals, AL 35661	

Please provide all corporate officers

Name	Title	Address	
Gary Moore	CEO	1440 Kinsman Road, Burton, OH 44021	
Andrew Chan	COO	1440 Kinsman Road, Burton, OH 44021	

Does the applicant applying for coverage have a Parent Corporation?

Yes

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**Parent Corporation of Applicant** 

Name	Address	
Hexpol Compounding, LLC	14330 Kinsman Road, Burton, OH 44021	

Does the applicant applying for coverage have Subsidiary Corporations?

# **Enforcement History**

Has the applicant been issued any Notices of Violation, Orders (Consent or Administrative/Unilateral), or Judicial Actions (Complaint, Settlement Agreement, Consent Decree, or Court Order) concerning water pollution or other permit violations within the State of Alabama in the past five years?

No

# **Business Activity**

A facility with processes inclusive in the business areas shown below may be covered by Environmental Protection Agency (EPA) categorical effluent guideline standards. These facilities are termed \*\*categorical users\*\*. If unsure, please call the Industrial Section at (334) 271-7943 to discuss or use the link below to contact the Permit Engineer for the county the facility is/will be located in.

Industrial Section Assignment Map

If your facility conducts or will be conducting any of the processes listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), please check the category of business activity: Rubber

Give a brief description of all operations at this facility including primary products or services:

Raw polymers are brought onsite and/or mixed together onsite with a portion being extruded forming molded rubber products. Additional polymers are extruded and provided to customers as specific compounds for use in the molded rubber industry.

# Water Supply

Water Sources (check all that apply):

Municipal Water Utility Private Well

Please specify the City of the Municipal Water Utility:

City of Muscle Shoals, AL

Name of Utility	Million Gallons per Day (MGD)
City of Muscle Shoals. AL	0.0060001

Well ID	Private Well in Million Gallions per Day (MGD)
Well 1, 2, 3, and 4	0.460
	Sum: 0.46

# **Cooling Water Intake Structure Information**

Does the provider of your source water operate a surface water intake? No

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

# Outfalls (1 of 2)

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Please click below if this discharge no longer exists or is no longer required: NONE PROVIDED

**Outfall Identifier** 

001

**Receiving Water** 

Spring Creek

Does the discharge enter the named receiving water via an unnamed tributary? Unnamed Tributary

Indicate if either of the following characteristics apply to this discharge:

Process Water commingled with Stormwater

Estimated Average Daily Flow (MGD)

0.360

Monitoring/Sampling Point Location

34.727550,-87.671178

#### Outfalls (2 of 2)

01A

Please click below if this discharge no longer exists or is no longer required: NONE PROVIDED

**Outfall Identifier** 

01A

**Receiving Water** 

Spring Creek

Does the discharge enter the named receiving water via an unnamed tributary? Unnamed Tributary

Indicate if either of the following characteristics apply to this discharge: Intermittent Discharge

Estimated Average Daily Flow (MGD)

0.135924

Monitoring/Sampling Point Location

34.72592137018095,-87.67064564523683

# Stormwater Outfalls (1 of 1)

SW01

Please click below if this discharge no longer exists or is no longer required: NONE PROVIDED

**Outfall Identifier** 

SW01

#### **Receiving Water**

Spring Creek

Does the discharge enter the named receiving water via an unnamed tributary?

**Unnamed Tributary** 

Indicate if either of the following characteristics apply to this discharge:

None apply

Monitoring/Sampling Point Location

34.727710,-87.671304

# Process Flow Schematic with Wastewater Treatment(s), If Applicable

For an example of a process flow diagram, please use the link below. Figure 1: Example of Process Flow Schematic

#### **Process Flow Schematic**

Robbins - 2023 - Water Flow Diagram.pdf - 11/10/2023 02:30 PM

Comment

NONE PROVIDED

# **Anti-Degradation Evaluation**

Is this a new or increased discharge that began after April 3, 1991?

# **Additional Information**

Do you share an outfall with another facility?

No

Indicate if automatic sampling equipment or continuous wastewater flow metering equipment is being operated at this facility:

Current	Yes/No
Continuous Wastewater Flow Metering Equipment	Yes
Automatic Sampling Equipment	Yes

Indicate if installation automatic sampling equipment or continuous wastewater flow metering equipment planned at this facility:

Planned	'(railto
Continuous Wastewater Flow Metering Equipment	140
Automatic Sampling Equipment	No

#### Please describe the equipment below:

Automatic Isco sampler and continuous wastewater flow meter is present at outfall DSN01A1. Automatic Isco sampler is present at outfall DSN001. There is no flow meter at DSN001.

Please attach the process schematic with sampling equipment locations.

Robbins - 2023 - Water Flow Diagram.pdf - 11/10/2023 02:31 PM

Comment

NONE PROVIDED

Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics (Consider production processes as well as air or water pollution treatment processes that may affect the discharge.)?

No

Do you use biocides, corrosion inhibitors, or chemical additives in your cooling or blowdown water? Yes

#### The applicant must provide a list of the following information for each biocide or chemical:

- (1) Name and general composition of biocide or chemical (if composition is not provided on MSDS sheet)
- (2) 48-hour or 96-hour LC50 data for organisms representative of the biota of the waterway into which the discharge will ultimately reach. For freshwater, the fathead minnow (Pimephales promelas) and cladoceran (Ceriodaphnia dubia) are the test organisms. For salt water, the mysid shrimp and the sheepshead minnow or inland silverside are the test organisms. Other acceptable aquatic organisms may be allowed by the Department if sufficient information is provided. If the MSDS sheet does not provide data for the organisms specified above, the facility must provide the data unless the Department grants approval for an alternate organism.
- (3) Quantities to be used
- (4) Frequencies of use
- (5) Maximum proposed discharge concentrations
- (6) EPA registration of number, if applicable and is not provided on the MSDS sheet.

#### List of Biocides

Please list biocides below:			
None			

#### Biocide/Corrosion Inhibitor Summary Sheet

NONE PROVIDED

Comment

NONE PROVIDED

#### Safety Data Sheets (SDS)

Robbins LLC - 2023 - SDSs.pdf - 11/10/2023 02:31 PM

Comment

NONE PROVIDED

#### **Treatment**

Is any form of wastewater treatment (see list below) practiced at this facility?

Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the next three years?

No

# **Facility Operational Characteristics**

#### Indicate whether the facility discharge is:

Continuous through the year

#### Comments:

NONE PROVIDED

# **Non-Discharged Wastes**

Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?

Waste Generated	Quantity (lbs/day)	Disposal Method	On-Site or Off-Site?	If Off-Site, Identify the Facility:
Oily Water	2617	Third Party	On-Site	

Does any outside firm remove any of the above checked wastes?

Yes

#### Hauler Information

Name	Address	City	State	Zip	
Classic Environmental	237 Posey Loop	Tuscumbia	AL	35674	

# **EPA Application Forms**

All Applicants must submit certain EPA permit application forms. More than one application form may be required.

Form 1 - General Information Form required for all applications

Form 2C - Should be submitted for facilities with existing discharge(s) of process wastewater.

Form 2D - Should be submitted for facilities that have not yet commenced discharge(s) of process wastewater.

Form 2E - Should be submitted for facilities who discharge non-process wastewater, such as non-contact cooling water or boiler blowdown.

Form 2F - Should be submitted for all discharges of storm water associated with an industrial activity. The EPA application forms are found on the Department s website here.

#### **EPA Form 1**

Robbins - 2023 - Form 1.pdf - 11/22/2023 03:18 PM **Comment**NONE PROVIDED

#### Additional EPA Forms (EPA Form 2C, 2D, 2E and/or 2F)

Robbins - 2023 - Form 2F.pdf - 11/22/2023 03:19 PM Robbins - 2023 - Form 2C.pdf - 11/22/2023 03:19 PM Comment NONE PROVIDED

#### Other attachments (as needed)

NONE PROVIDED

Comment

NONE PROVIDED

# **Additional Attachments**

Please attach any additional information as needed.

NONE PROVIDED

Comment

NONE PROVIDED

# Application Preparer

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#### **Application Preparer**

**Prefix** 

Mr.

First Name Last Name

Jacob

Dennison

Title

Environmental Scientist

**Organization Name** 

Southern Environmental Engineering Inc.

Phone Type Number

Extension

Mobile

2564430528

**Email** 

jdennison@see-env.com

Address

1222 HELTON DR

FLORENCE, AL 35630

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# Agreements and Signature(s)

#### SUBMISSION AGREEMENTS

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

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

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

#### NOTE: 335-6-5-.14 SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS.

The application shall be signed by a responsible official, a request for variance from categorical pretreatment standards, and a category determination request shall be signed by a responsible official, as indicated below.

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

Signed By

Terry Elgin on 11/27/2023 at 8:26 AM



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 1 of 9

#### 1 Identification

· Product identifier

· Trade name: GI 270 Dispersant

· Article number: No other identifiers

· Recommended use and restriction on use

· Recommended use:

Dispersing agent, Dispersant

Deposit remover

· Restrictions on use: No further relevant information available.

· Details of the supplier of the Safety Data Sheet

· Manufacturer/Supplier:

Guardian IPCO, Inc.

P.O. Box 380128

Birmingham, AL

35238-0128

(205) 991-5316

· Emergency telephone number:

ChemTel Inc.

(800)255-3924, +1 (813)248-0585

# 2 Hazard(s) identification

· Classification of the substance or mixture



GHS07

Eye Irrit. 2A H319 Causes serious eye irritation.

Additional information:

There are no other hazards not otherwise classified that have been identified.

0 percent of the mixture consists of ingredient(s) of unknown toxicity.

- · Label elements
- · GHS label elements

The procluct is classified and labeled according to the Globally Harmonized System (GHS).

· Hazard pictograms



GHS07

- · Signal word Warning
- · Hazard-determining components of labeling:

[nitrilotris(methylene)]trisphosphonic acid, potassium salt

· Hazard statements

H319 Causes serious eye irritation.

· Precautionary statements

P280

Wear protective gloves and eye protection.

(Contd. on page 2)



# **Safety Data Sheet** acc. to OSHA HCS (29 CFR 1910.1200)

Page 2 of 9

#### Trade name: GI 270 Dispersant

P264 Wash thoroughly after handling. (Contd. of page 1)

P305+P351+P338 If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P337+P313

If eye irritation persists: Get medical advice/attention.

· Hazard description:

- · WHMIS-symbols: Not hazardous under WHMIS.
- · Classification system:
- · NFPA ratings (scale 0 4)



Health = 1 Fire = 0 Reactivity = 0

· HMIS-ratings (scale 0 - 4)



1 Health = 1 Fire = 0

- · Other hazards
- · Results of PBT and vPvB assessment
- · PBT: Not applicable.
- · vPvB: Not applicable.

#### 3 Composition/information on ingredients

- · Chemical characterization: Mixtures
- · Description: Mixture of the substances listed below with nonhazardous additions.

-	components:	
27794-93-0	[nitrilotris(methylene)]trisphosphonic acid, potassium salt	10-20%
	① Eye Irrit. 2A, H319	
26099-09-2	polymaleic acid	< 10%
	♦ Skin Irrit. 2, H315; Eye Irrit. 2A, H319	
70247-90-4	2,5-furandione homoploymer sodium salt	≤ 2.5%
	♦ Skin Irrit. 2, H315; Eye Irrit. 2A, H319	

· Additional information:

For the listed ingredients, the identity and exact percentages are being withheld as a trade secret.

#### 4 First-aid measures

- · Description of first aid measures
- · General information: Immediately remove any clothing soiled by the product.
- · After inhalation: Supply fresh air; consult doctor in case of complaints.
- · After skin contact:

Immediately rinse with water.

If skin irritation is experienced, consult a doctor.

(Contd. on page 3)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200)

Page 3 of 9

(Contd. of page 2)

Trade name: GI 270 Dispersant

· After eye contact:

Remove contact lenses if worn.

Rinse opened eye for several minutes under running water. If symptoms persist, consult a doctor.

· After swallowing:

Rinse out mouth and then drink plenty of water.

Do not induce vomiting; immediately call for medical help.

· Information for doctor:

· Most important symptoms and effects, both acute and delayed

May cause gastro-intestinal irritation if ingested.

Nausea in case of ingestion.

· Danger Danger of gastric perforation.

· Indication of any immediate medical attention and special treatment needed

No further relevant information available.

#### 5 Fire-fighting measures

· Extinguishing media

· Suitable extinguishing agents:

The product is not flammable.

Use fire fighting measures that suit the environment.

· For safety reasons unsuitable extinguishing agents: None.

· Special hazards arising from the substance or mixture

Formation of toxic gases is possible during heating or in case of fire.

· Advice for firefighters

· Protective equipment:

Wear self-contained respiratory protective device.

Wear fully protective suit.

· Additional information No further relevant information available.

#### 6 Accidental release measures

· Personal precautions, protective equipment and emergency procedures

Ensure adequate ventilation.

Wear protective equipment. Keep unprotected persons away.

· Environmental precautions:

Dilute with plenty of water.

Avoid release to the environment.

· Methods and material for containment and cleaning up:

Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).

Dispose contaminated material as waste according to item 13.

Send for recovery or disposal in suitable receptacles.

· Reference to other sections

See Section 7 for information on safe handling.

See Section 8 for information on personal protection equipment.

See Section 13 for disposal information.

(Contd. on page 4)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 4 of 9

Trade name: GI 270 Dispersant

(Contd. of page 3)

#### 7 Handling and storage

- · Handling:
- · Precautions for safe handling

Use only in well ventilated areas.

Prevent formation of aerosols.

- · Information about protection against explosions and fires: No special measures required.
- · Conditions for safe storage, including any incompatibilities
- · Storage:
- Requirements to be met by storerooms and receptacles: No special requirements.
- · Information about storage in one common storage facility:

Store away from foodstuffs.

Do not store together with acids.

Store away from oxidizing agents.

- Further information about storage conditions: Keep receptacle tightly sealed.
- · Specific end use(s) No further relevant information available.

# 8 Exposure controls/personal protection

- · Additional information about design of technical systems: No further data; see item 7.
- · Control parameters
- · Components with limit values that require monitoring at the workplace:

The product does not contain any relevant quantities of materials with critical values that have to be monitored at the workplace.

- · Additional information: The lists that were valid during the creation were used as basis.
- · Exposure controls
- · Personal protective equipment:
- · General protective and hygienic measures:

The usual precautionary measures for handling chemicals should be followed.

Keep away from foodstuffs, beverages and feed.

Immediately remove all soiled and contaminated clothing.

Wash hands before breaks and at the end of work.

Avoid contact with the eyes and skin.

- · Engineering controls: No further relevant information available.
- · Breathing equipment: Not required under normal conditions of use.
- · Protection of hands:



Protective gloves

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation. Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation

· Material of gloves

(Contd. on page 5)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200)

Page 5 of 9

Trade name: GI 270 Dispersant

(Contd. of page 4)

The selection of the suitable gloves does not only depend on the material, but also on further marks of quality and varies from manufacturer to manufacturer. As the product is a preparation of several substances, the resistance of the glove material can not be calculated in advance and has therefore to be checked prior to the application.

· Penetration time of glove material

The exact break through time has to be found out by the manufacturer of the protective gloves and has to be observed.

· Eye protection:



Safety glasses

· Body protection: Protective work clothing

· Limitation and supervision of exposure into the environment

No further relevant information available.

# 9 Physical and chemical properties

· Information on basic physical and chemical properties

· General Information

· Appearance:

Form: Liquid Color: Light v

Color: Light yellow Odor: Mild

· Odor threshold: Not determined.

· pH-value at 20 °C (68 °F): 7-7.5

· Change in condition

Melting point/Melting range:
Boiling point/Boiling range:
Undetermined.

Flash point:
Not applicable.

• Flammability (solid, gaseous): Not applicable.
• Auto-ignition temperature: Not determined.

· Decomposition temperature: Not determined.

· Auto igniting: Product is not self-igniting.

Danger of explosion: Product does not present an explosion hazard.

· Explosion limits:

Lower: Not determined. Not determined.

Vapor pressure: Not determined.

Density at 20 °C (68 °F): 1.13 g/cm³ (9.43 lbs/gal)

Relative density

Vapour density

Not determined.

Not determined.

(Contd. on page 6)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200)

Page 6 of 9

Trade name: GI 270 Dispersant

Not determined.

(Contd. of page 5)

· Solubility in / Miscibility with

Water:

Fully miscible.

· Partition coefficient (n-octanol/water): Not determined.

· Viscosity:

Dynamic: Kinematic:

· Evaporation rate

Not determined. Not determined.

· Other information

No further relevant information available.

# 10 Stability and reactivity

- Reactivity
- · Chemical stability
- · Thermal decomposition / conditions to be avoided:

No decomposition if used and stored according to specifications.

· Possibility of hazardous reactions

Reacts with acids.

Reacts with oxidizing agents.

· Conditions to avoid

Avoid acids.

Store away from oxidizing agents.

- · Incompatible materials: Oxidizers, strong bases, strong acids
- · Hazardous decomposition products:

Carbon monoxide and carbon dioxide

Nitrogen oxides (NOx)

Sulfur oxides (SOx)

Phosphorus oxides (e.g. P2O5)

# 11 Toxicological information

- · Information on toxicological effects
- · Acute toxicity:
- · LD/LC50 values that are relevant for classification: None.
- · Primary irritant effect:
- on the skin: Slight irritant effect on skin and mucous membranes.
- on the eye: Irritating effect.
- · Sensitization: No sensitizing effects known.
- · Subacute to chronic toxicity: No further relevant information available.
- · Additional toxicological information:
- · Carcinogenic categories

#### NTP (National Toxicology Program)

None of the ingredients is listed.

· OSHA-Ca (Occupational Safety & Health Administration)

None of the ingredients is listed.

(Contd. on page 7)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 7 of 9

Trade name: GI 270 Dispersant

(Contd. of page 6)

· Probable Routes of Exposure

Eye contact.

Skin contact.

- · Acute effects (acute toxicity, irritation and corrosivity): Ingestion may cause gastrointestinal upset.
- Repeated Dose Toxicity: No further relevant information available.

#### 12 Ecological information

- · Toxicity
- · Aquatic toxicity: 48 hr LC50 C. Dubia 2,530 ppm P. Promelas 6,460 ppm
- · Persistence and degradability No further relevant information available.
- · Behavior in environmental systems:
- · Bioaccumulative potential No further relevant information available.
- · Mobility in soil No further relevant information available.
- · Additional ecological information:
- · General notes:

Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.

· Other adverse effects No further relevant information available.

# 13 Disposal considerations

- · Waste treatment methods
- · Recommendation:

Must not be disposed of together with household garbage. Do not allow product to reach sewage system. Small amounts may be diluted with plenty of water and washed away. Dispose of bigger amounts in accordance with Local Authority requirements.

The user of this material has the responsibility to dispose of unused material, residues and containers in compliance with all relevant local, state and federal laws and regulations regarding treatment, storage and disposal for hazardous and nonhazardous wastes. Residual materials should be treated as hazardous.

- · Uncleaned packagings:
- · Recommendation: Disposal must be made according to official regulations.

#### 14 Transport information

· UN-Number

DOT, ADR, ADN, IMDG, IATA

Not Regulated

· UN proper shipping name

DOT, ADR, ADN, IMDG, IATA

Not Regulated

· Transport hazard class(es)

DOT, ADR, ADN, IMDG, IATA

· Class

Not Regulated

· Packing group

DOT, ADR, IMDG, IATA

Not Regulated

(Contd. on page 8)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200)

Page 8 of 9

Trade name: GI 270 Dispersant

(Contd. of page 7)

· Environmental hazards:

· Marine pollutant:

No

Not applicable. · Special precautions for user

· Transport in bulk according to Annex II of

MARPOL73/78 and the IBC Code Not applicable.

· UN "Model Regulation":

#### 15 Regulatory information

- · Safety, health and environmental regulations/legislation specific for the substance or mixture
- · United States (USA)
- SARA
- Section 355 (extremely hazardous substances):

None of the ingredients is listed.

· Section 313 (Specific toxic chemical listings):

None of the ingredients are listed.

· TSCA (Toxic Substances Control Act):

All ingredients are listed.

- · Proposition 65 (California)
- · Chemicals known to cause cancer:

None of the ingredients are listed.

· Chemicals known to cause reproductive toxicity for females:

None of the ingredients are listed.

· Chemicals known to cause reproductive toxicity for males:

None of the ingredients is listed.

· Chemicals known to cause developmental toxicity:

None of the ingredients is listed.

- · Carcinogenic categories
- · EPA (Environmental Protection Agency)

None of the ingredients is listed.

· IARC (International Agency for Research on Cancer)

None of the ingredients is listed.

TLV (Threshold Limit Value established by ACGIH)

None of the ingredients is listed.

· NIOSH-Ca (National Institute for Occupational Safety and Health)

None of the ingredients is listed.

· State Right to Know Listings

None of the ingredients is listed.

(Contd. on page 9)



# **Safety Data Sheet** acc. to OSHA HCS (29 CFR 1910.1200)

Page 9 of 9

Trade name: GI 270 Dispersant

· Canadian substance listings:

(Contd. of page 8)

· Canadian Domestic Substances List (DSL)

All ingredients are listed.

· Canadian Ingredient Disclosure list (limit 0.1%)

None of the ingredients is listed.

· Canadian Ingredient Disclosure list (limit 1%)

None of the ingredients is listed.

· Other regulations, limitations and prohibitive regulations

This product has been classified in accordance with hazard criteria of the Controlled Products Regulations and the SDS contains all the information required by the Controlled Products Regulations.

· Chemical safety assessment: A Chemical Safety Assessment has not been carried out.

#### 16 Other information

This information is based on our present knowledge. However, this shall not constitute a guarantee for any specific product features and shall not establish a legally valid contractual relationship.

· Date of preparation / last revision 04/07/2015 / -

Abbreviations and acronyms:

ADR: Accord européen sur le transport des marchandises dangereuses par Route (European Agreement concerning the International Carriage of Dangerous Goods by Road)

IMDG: International Maritime Code for Dangerous Goods

DOT: US Department of Transportation

IATA: International Air Transport Association

ACGIH: American Conference of Governmental Industrial Hygienists

EINECS: European Inventory of Existing Commercial Chemical Substances

**ELINCS: European List of Notified Chemical Substances** 

CAS: Chemical Abstracts Service (division of the American Chemical Society)

NFPA: National Fire Protection Association (USA)

HMIS: Hazardous Materials Identification System (USA)

WHMIS: Workplace Hazardous Materials Information System (Canada)

LC50: Lethal concentration, 50 percent

LD50: Lethal dose, 50 percent

Skin Irrit. 2: Skin corrosion/irritation, Hazard Category 2

Eye Irrit. 2A: Serious eye damage/eye irritation, Hazard Category 2A

Sources

SDS Prepared by:

ChemTel Inc.

1305 North Florida Avenue

Tampa, Florida USA 33602-2902

Toll Free North America 1-888-255-3924 Intl. +01 813-248-0573

Website: www.chemtelinc.com



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 1 of 9

#### 1 Identification

- · Product identifier
- · Trade name: GI 628 Oxygen Scavenger
- · Article number: No other identifiers
- · Recommended use and restriction on use
- · Recommended use: Corrosion inhibitors
- · Restrictions on use: No further relevant information available.
- · Details of the supplier of the Safety Data Sheet
- · Manufacturer/Supplier:

Guardian IPCO, Inc.

P.O. Box 380128

Birmingham, AL

35238-0128

(205) 991-5316

· Emergency telephone number:

ChemTel Inc.

(800)255-3924, +1 (813)248-0585

### 2 Hazard(s) identification

- · Classification of the substance or mixture
- The product is not classified as hazardous according to the Globally Harmonized System (GHS).
- · Additional information:

Contact with acids liberates toxic gas.

There are no other hazards not otherwise classified that have been identified.

O percent of the mixture consists of ingredient(s) of unknown toxicity.

- · Label elements
- · GHS label elements Not Regulated
- · Hazard pictograms Not Regulated
- · Signal word Not Regulated
- · Hazard-determining components of labeling:

sodium sulphite

- · Hazard statements Not Regulated
- · Precautionary statements Not Regulated
- · Additional information: Contact with acids liberates toxic gas.
- · Hazard description:
- · WHMIS-symbols: Not hazardous under WHMIS.
- · Classification system:
- · NFPA ratings (scale 0 4)



Health = 0 Fire = 0 Reactivity = 0

(Contd. on page 2)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200)

Page 2 of 9

Trade name: GI 628 Oxygen Scavenger

(Contd. of page 1)

· HMIS-ratings (scale 0 - 4)

HEALTH 0
FIRE 0
REACTIVITY 0

Health = 0Fire = 0

REACTIVITY Reactivity = 0

- · Other hazards
- · Results of PBT and vPvB assessment
- · PBT: Not applicable.
- · vPvB: Not applicable.

# 3 Composition/information on ingredients

- · Chemical characterization: Mixtures
- · Description: Mixture of the substances listed below with nonhazardous additions.
- · Dangerous components:

7757-83-7 sodium sulfite

10-20%

· Additional information:

For the listed ingredients, the identity and exact percentages are being withheld as a trade secret.

#### 4 First-aid measures

- Description of first aid measures
- · General information: No special measures required.
- · After inhalation: Supply fresh air; consult doctor in case of complaints.
- · After skin contact:

Immediately rinse with water.

If skin irritation is experienced, consult a doctor.

· After eye contact:

Remove contact lenses if worn.

Rinse opened eye for several minutes under running water. If symptoms persist, consult a doctor.

· After swallowing:

Rinse out mouth and then drink plenty of water.

Do not induce vomiting; immediately call for medical help.

- Information for doctor:
- · Most important symptoms and effects, both acute and delayed

Asthma attacks

May cause respiratory irritation.

May cause gastro-intestinal irritation if ingested.

- · Danger No further relevant information available.
- · Indication of any immediate medical attention and special treatment needed

If swallowed, gastric irrigation with added, activated carbon.

Contains Sodium Sulfite. Consult literature for specific antidotes.

(Contd. on page 3)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200)

Page 3 of 9

Trade name: GI 628 Oxygen Scavenger

(Contd. of page 2)

#### 5 Fire-fighting measures

- · Extinguishing media
- · Suitable extinguishing agents:

The product is not flammable.

Use fire fighting measures that suit the environment.

- · For safety reasons unsuitable extinguishing agents: None.
- · Special hazards arising from the substance or mixture

Formation of toxic gases is possible during heating or in case of fire.

- · Advice for firefighters
- · Protective equipment:

Wear self-contained respiratory protective device.

Wear fully protective suit.

· Additional information No further relevant information available.

#### 6 Accidental release measures

· Personal precautions, protective equipment and emergency procedures

Use respiratory protective device against the effects of fumes/dust/aerosol.

Ensure adequate ventilation.

- · Environmental precautions: Do not allow to enter sewers/ surface or ground water.
- · Methods and material for containment and cleaning up:

Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).

Dispose contaminated material as waste according to item 13.

Send for recovery or disposal in suitable receptacles.

· Reference to other sections

See Section 7 for information on safe handling.

See Section 8 for information on personal protection equipment.

See Section 13 for disposal information.

# 7 Handling and storage

- · Handling:
- · Precautions for safe handling

Use only in well ventilated areas.

Prevent formation of aerosols.

- · Information about protection against explosions and fires: No special measures required.
- · Conditions for safe storage, including any incompatibilities
- · Storage:
- · Requirements to be met by storerooms and receptacles:

Store in a cool location.

Provide ventilation for receptacles.

· Information about storage in one common storage facility:

Do not store together with acids.

Store away from oxidizing agents.

Store away from foodstuffs.

(Contd. on page 4)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 4 of 9

Trade name: GI 628 Oxygen Scavenger

(Contd. of page 3)

- · Further information about storage conditions: Keep receptacle tightly sealed.
- · Specific end use(s) No further relevant information available.

#### 8 Exposure controls/personal protection

- · Additional information about design of technical systems: No further data; see item 7.
- Control parameters
- · Components with limit values that require monitoring at the workplace:

#### 1310-58-3 Potassium hydroxide

REL (USA) Ceiling limit value: 2 mg/m³
TLV (USA) Ceiling limit value: 2 mg/m³
EL (Canada) Ceiling limit value: 2 mg/m³
EV (Canada) Ceiling limit value: 2 mg/m³
LMPE (Mexico) Ceiling limit value: 2 mg/m³

- Additional information: The lists that were valid during the creation were used as basis.
- · Exposure controls
- · Personal protective equipment:
- · General protective and hygienic measures:

The usual precautionary measures for handling chemicals should be followed.

Keep away from foodstuffs, beverages and feed.

Wash hands before breaks and at the end of work.

Avoid contact with the eyes and skin.

- · Engineering controls: No further relevant information available.
- · Breathing equipment: Not required under normal conditions of use.
- · Protection of hands:



Protective gloves

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation. Selection of the glove materia or consideration of the penetration times, rates of diffusion and the degradation

Material of gloves

The selection of the suitable gloves does not only depend on the material, but also on further marks of quality and varies from manufacturer to manufacturer. As the product is a preparation of several substances, the resistance of the glove material can not be calculated in advance and has therefore to be checked prior to the application.

· Penetration time of glove material

The exact break through time has to be found out by the manufacturer of the protective gloves and has to be observed.

· Eye protection:



Safety glasses

Body protection: Not required under normal conditions of use.

(Contd. on page 5)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 5 of 9

Trade name: GI 628 Oxygen Scavenger

(Contd. of page 4)

· Limitation and supervision of exposure into the environment No further relevant information available.

### 9 Physical and chemical properties

· Information on basic physical and chemical properties

· General Information

· Appearance:

Form: Color: Liquid

Amber colored

· Odor:

Mild

· Odor threshold:

Not determined.

· pH-value at 20 °C (68 °F):

7 - 8

· Change in condition

Melting point/Melting range:

Undetermined.

Boiling point/Boiling range:

Undetermined.

· Flash point:

Not applicable. Not applicable.

· Flammability (solid, gaseous):

· Auto-ignition temperature:

Not determined.

· Decomposition temperature:

Not determined.

· Auto igniting:

Product is not self-igniting.

· Danger of explosion:

Product does not present an explosion hazard.

· Explosion limits:

Lower:

Not determined.

Upper:

Not determined.

· Vapor pressure:

Not determined.

· Density at 20 °C (68 °F):

1.15 g/cm3 (10.097 lbs/gal)

Relative density

Not determined.

· Vapour density

Not determined.

· Evaporation rate

Not determined.

· Solubility in / Miscibility with

Water:

Fully miscible.

· Partition coefficient (n-octanol/water): Not determined.

· Viscosity:

Dynamic: Kinematic: Not determined.

· Other information

Not determined. No further relevant information available.

(Contd. on page 6)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 6 of 9

Trade name: GI 628 Oxygen Scavenger

(Contd. of page 5)

#### 10 Stability and reactivity

- Reactivity
- · Chemical stability
- · Thermal decomposition / conditions to be avoided:

No decomposition if used and stored according to specifications.

· Possibility of hazardous reactions

Contact with acids releases toxic gases.

Reacts with oxidizing agents.

Reacts with aldehydes.

· Conditions to avoid

Avoid acids.

Store away from oxidizing agents.

- · Incompatible materials: Oxidizers, strong bases, strong acids
- · Hazardous decomposition products:

Carbon monoxide and carbon dioxide

Sulfur oxides (SOx)

#### 11 Toxicological information

- · Information on toxicological effects
- · Acute toxicity:
- · LD/LC50 values that are relevant for classification: None.
- · Primary irritant effect:
- on the skin: Slight irritant effect on skin and mucous membranes.
- on the eye: Slight irritant effect on eyes.
- · Sensitization: No sensitizing effects known.
- · Subacute to chronic toxicity: No further relevant information available.
- · Additional toxicological information:

May cause respiratory irritation.

Irritant

- · Carcinogenic categories
- · NTP (National Toxicology Program)

None of the ingredients is listed.

· OSHA-Ca (Occupational Safety & Health Administration)

None of the ingredients is listed.

· Probable Routes of Exposure

Inhalation.

Eye contact.

Skin contact.

· Acute effects (acute toxicity, irritation and corrosivity):

May cause gastro-intestinal irritation if ingested.

· Repeated Dose Toxicity: No further relevant information available.

(Contd. on page 7)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 7 of 9

Trade name: GI 628 Oxygen Scavenger

(Contd. of page 6)

#### 12 Ecological information

- · Toxicity
- · Aquatic toxicity: No further relevant information available.
- · Persistence and degradability No further relevant information available.
- Behavior in environmental systems:
- · Bioaccumulative potential No further relevant information available.
- · Mobility in soil No further relevant information available.
- · Additional ecological information:
- · General notes:

Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.

· Other adverse effects No further relevant information available.

#### 13 Disposal considerations

- · Waste treatment methods
- · Recommendation:

Smaller quantities can be disposed of with household waste.

Small amounts may be diluted with plenty of water and washed away. Dispose of bigger amounts in accordance with Local Authority requirements.

The user of this material has the responsibility to dispose of unused material, residues and containers in compliance with all relevant local, state and federal laws and regulations regarding treatment, storage and disposal for hazardous and nonhazardous wastes. Residual materials should be treated as hazardous.

- Uncleaned packagings:
- · Recommendation: Disposal must be made according to official regulations.

#### 14 Transport information

· UN-Number

· DOT, ADR, ADN, IMDG, IATA Not Regulated

· UN proper shipping name

· DOT, ADR, ADN, IMDG, IATA Not Regulated

· Transport hazard class(es)

· DOT, ADR, ADN, IMDG, IATA

· Class Not Regulated

· Packing group

· DOT, ADR, IMDG, IATA Not Regulated

· Environmental hazards:

· Marine pollutant:

· Special precautions for user Not applicable.

· Transport in bulk according to Annex II of

MARPOL73/78 and the IBC Code Not applicable.

(Contd. on page 8)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200) Page 8 of 9

Trade name: GI	628 Oxygen	Scavenger
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· UN "Model Regulation":

(Contd. of page 7)

#### 15 Regulatory information

- · Safety, health and environmental regulations/legislation specific for the substance or mixture
- · United States (USA)
- SARA
- · Section 355 (extremely hazardous substances):

None of the ingredients is listed.

· Section 313 (Specific toxic chemical listings):

None of the ingredients are listed.

· TSCA (Toxic Substances Control Act):

All ingredients are listed.

- · Proposition 65 (California)
- · Chemicals known to cause cancer:

None of the ingredients are listed.

· Chemicals known to cause reproductive toxicity for females:

None of the ingredients are listed.

· Chemicals known to cause reproductive toxicity for males:

None of the ingredients is listed.

· Chemicals known to cause developmental toxicity:

None of the ingredients is listed.

- · Carcinogenic categories
- · EPA (Environmental Protection Agency)

None of the ingredients is listed.

· IARC (International Agency for Research on Cancer)

None of the ingredients is listed.

TLV (Threshold Limit Value established by ACGIH)

None of the ingredients is listed.

· NIOSH-Ca (National Institute for Occupational Safety and Health)

None of the ingredients is listed.

State Right to Know Listings

None of the ingredients is listed.

- · Canadian substance listings:
- · Canadian Domestic Substances List (DSL)

All ingredients are listed.

· Canadian Ingredient Disclosure list (limit 0.1%)

None of the ingredients is listed.

(Contd. on page 9)



# Safety Data Sheet acc. to OSHA HCS (29 CFR 1910.1200)

Page 9 of 9

Trade name: GI 628 Oxygen Scavenger

(Contd. of page 8)

· Canadian Ingredient Disclosure list (limit 1%)

None of the ingredients is listed.

· Other regulations, limitations and prohibitive regulations

This product has been classified in accordance with hazard criteria of the Controlled Products Regulations and the SDS contains all the information required by the Controlled Products Regulations.

· Chemical safety assessment: A Chemical Safety Assessment has not been carried out.

# 16 Other information

This information is based on our present knowledge. However, this shall not constitute a guarantee for any specific product features and shall not establish a legally valid contractual relationship.

· Date of preparation / last revision 04/08/2015 / -

· Abbreviations and acronyms:

ADR: Accord européen sur le transport des marchandises dangereuses par Route (European Agreement concerning the International Camisge of Dangerous Goods by Road)

IMDG: International Maritime Code for Dangerous Goods

DOT: US Department of Transportation

IATA: International Air Transport Association

ACGIH: American Conference of Governmental Industrial Hygienists

EINECS: European Inventory of Existing Commercial Chemical Substances

ELINCS: European List of Notified Chemical Substances

CAS: Chemical Abstracts Service (division of the American Chemical Society)

NFPA: National Fire Protection Association (USA)

HMIS: Hazardous Materials Identification System (USA)

WHMIS: Workplace Hazardous Materials Information System (Canada)

LC50: Lethal concentration, 50 percent

LD50: Lethal dose, 50 percent

· Sources

SDS Prepared by:

ChemTel Inc.

1305 North Florida Avenue

Tampa, Florida USA 33602-2902

Toll Free North America 1-888-255-3924 Intl. +01 813-248-0573

Website: www.chemtelinc.com

# SAFETY DATA SHEET

#### 1. Identification

Product identifier GI #775
Other means of identification None.

Recommended use Condensate Treatment Product

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Manufacturer

Address

Telephone

Company name

Guardian-IPCO, Inc. 44 Vann Drive

P.O. Box 380128 Birmingham, AL 35238

United States (205) 991-5316

Website www.guardian-ipco.com
E-mail sales@guardian-ipco.com

Emergency phone number

(800) 255-3924

ChemTel

#### 2. Hazard(s) identification

Physical hazards Not classified.

Health hazards Acute toxicity, dermal

Skin corrosion/irritation Category 1

Serious eye damage/eye irritation

Category 1

Category 3

Label elements

Hazard symbol Signal word None.

**Hazard statement** 

Not available.

Precautionary statement

Prevention Not available.
Response Not available.
Storage Not available.
Disposal Not available.

Hazard(s) not otherwise classified (HNOC)

None known.

Supplemental information

None.

#### 3. Composition/information on ingredients

#### Mixtures

Chemical name	Common name and synonyms	CAS number	%
2-Diethylaminoethanol		100-37-8	20 - 40
Morpholine		110-91-8	1 - 5
1,2-Ethanediamine		107-15-3	0.01 - 0.1
4-Ethylmorpholine		100-74-3	0.01 - 0.1

#### 4. First-aid measures

Inhalation Not available.

Skin contact Not available.

Eye contact Not available.

Ingestion Not available.

Material name: GI #775

SDS US

Most important symptoms/effects, acute and delayed

Not available.

# 5. Fire-fighting measures

Suitable extinguishing media Unsuitable extinguishing

Not available. Not available.

media

Specific hazards arising from the chemical

Not applicable.

Special protective equipment

Not available.

and precautions for firefighters

#### 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

Not available.

Methods and materials for containment and cleaning up

Not available.

**Environmental precautions** 

Not available.

#### 7. Handling and storage

Precautions for safe handling

Not available.

Conditions for safe storage, including any incompatibilities Not available.

#### 8. Exposure controls/personal protection

Value

#### Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000) Components

Type

1,2-Ethanediamine (CAS 107-15-3)	PEL	25 mg/m3
		10 ppm
2-Diethylaminoethanol (CAS 100-37-8)	PEL	50 mg/m3
		10 ppm
4-Ethylmorpholine (CAS 100-74-3)	PEL	94 mg/m3
		20 ppm
Morpholine (CAS 110-91-8)	PEL	70 mg/m3
		20 ppm
US. ACGIH Threshold Limit Values	•	
Components	Туре	Value
1,2-Ethanediamine (CAS 107-15-3)	TWA	10 ppm
2-Diethylaminoethanol (CAS 100-37-8)	TWA	2 ppm
4-Ethylmorpholine (CAS 100-74-3)	TWA	5 ppm
Morpholine (CAS 110-91-8)	TWA	20 ppm
US. NIOSH: Pocket Guide to Chem	nical Hazards	
Components	Туре	Value
1,2-Ethanediamine (CAS 107-15-3)	TWA	25 mg/m3
·		10 ppm

Components	Туре	Value
2-Diethylaminoethanol (CAS 100-37-8)	TWA	50 mg/m3
		10 ppm
4-Ethylmorpholine (CAS 100-74-3)	TWA	23 mg/m3
		5 ppm
Morpholine (CAS 110-91-8)	STEL	105 mg/m3
		30 ppm
	TWA	70 mg/m3
		20 ppm
ological limit values	No biological exposure	e limits noted for the ingredient(s).
posure guidelines		
US - California OELs: Ski	n designation	
2-Diethylaminoethanol		Can be absorbed through the skin.
4-Ethylmorpholine (CA		Can be absorbed through the skin.
Morpholine (CAS 110- US - Minnesota Haz Subs		Can be absorbed through the skin. s
2-Diethylaminoethanol		Skin designation applies.
4-Ethylmorpholine (CA	S 100-74-3)	Skin designation applies.
Morpholine (CAS 110-		Skin designation applies.
US - Tennessee OELs: Sk		One has been been been all the settle
2-Diethylaminoethanol 4-Ethylmorpholine (CA		Can be absorbed through the skin.  Can be absorbed through the skin.
Morpholine (CAS 110-		Can be absorbed through the skin.
<b>US ACGIH Threshold Lim</b>		
1,2-Ethanediamine (CAS 107-15-3)		Danger of cutaneous absorption
2-Diethylaminoethanol (CAS 100-37-8)		Danger of cutaneous absorption
4-Ethylmorpholine (CA Morpholine (CAS 110-		Danger of cutaneous absorption  Danger of cutaneous absorption
US NIOSH Pocket Guide t		
2-Diethylaminoethanol		Can be absorbed through the skin.
4-Ethylmorpholine (CA		Can be absorbed through the skin.
Morpholine (CAS 110-91-8)		Can be absorbed through the skin.
US. OSHA Table Z-1 Limit		
2-Diethylaminoethanol 4-Ethylmorpholine (CA		Can be absorbed through the skin. Can be absorbed through the skin.
Morpholine (CAS 110-9		Can be absorbed through the skin.
opropriate engineering	Not available.	
dividual protection measure	s, such as personal prot	ective equipment
Eye/face protection	Not available.	
Skin protection		
Hand protection	Not available.	
Other	Not available.	
Respiratory protection	Not available.	
	9. Physical	and chemical properties
ppearance		
Physical state	Liquid.	
Form	Not available.	
Color	Not available.	
dor	Not available.	

Odor threshold

рΗ

Not available.

11.7 - 12.7

Melting point/freezing point

< 40 °F (< 4.4 °C) estimated

Initial boiling point and boiling

> 212 °F (> 100 °C) estimated

range

Flash point

200 °F (93.3 °C) Pensky-Martens Closed Cup

**Evaporation rate** 

Not available.

Flammability (solid, gas)

Not available.

Upper/lower flammability or explosive limits

Flammability limit - lower

Not available.

(%)

Explosive limit - lower (%)

Flammability limit - upper

Not available. Not available.

Explosive limit - upper (%)

Not available.

Vapor pressure

< 1.0 mm Hg estimated

Vapor density

Not available.

Relative density

Not available.

Solubility(ies)

Solubility (water)

Complete

Partition coefficient

Not available.

(n-octanol/water)

Auto-ignition temperature

Not available.

Decomposition temperature

Not available.

Viscosity

Not available.

Other information

Density

8.26 lb/gal

Flammability class

Combustible IIIB estimated

Percent volatile

> 70 % estimated

Specific gravity

0.99

#### 10. Stability and reactivity

Reactivity

Not available.

Chemical stability

Not available.

Possibility of hazardous

Not available.

reactions

Not available.

Conditions to avoid Incompatible materials

Not available.

Hazardous decomposition

Not available.

products

#### 11. Toxicological information

#### Information on likely routes of exposure

Inhalation

Not available.

Skin contact

Not available.

Eye contact

Not available.

Ingestion

Not available.

Symptoms related to the physical, chemical and toxicological characteristics Not available.

#### Information on toxicological effects

**Acute toxicity** 

Not available.

Skin corrosion/irritation Serious eye damage/eye Not available.

Not available.

irritation

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Respiratory or skin sensitization

Respiratory sensitization Not available.

Skin sensitization

Not available.

Germ cell mutagenicity

Not available.

Carcinogenicity

IARC Monographs. Overall Evaluation of Carcinogenicity

Morpholine (CAS 110-91-8)

3 Not classifiable as to carcinogenicity to humans.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

US. National Toxicology Program (NTP) Report on Carcinogens

Not listed.

Reproductive toxicity

Not available.

Specific target organ toxicity -

Not available.

single exposure

Specific target organ toxicity -

Not available.

repeated exposure

Not available. Aspiration hazard

12. Ecological information

No ecotoxicity data noted for the ingredient(s). **Ecotoxicity** 

Persistence and degradability

Not available.

**Bioaccumulative potential** 

Not available.

Partition coefficient n-octanol / water (log Kow)

1.2-Ethanediamine

-2.04

Morpholine

-0.86

Mobility in soil

Not available.

Other adverse effects Not available.

13. Disposal considerations

**Disposal instructions** 

Not available.

Waste from residues / unused

Not available.

products

Contaminated packaging

Not available.

#### 14. Transport information

DOT

**UN** number

UN3267

UN proper shipping name

Corrosive liquid, basic, organic, n.o.s. (2-Diethylaminoethanol, Morpholine)

Transport hazard class(es)

Class

8

Subsidiary risk

Label(s)

8

Packing group

Special precautions for user Not available. Special provisions

IB3, T7, TP1, TP28

Packaging exceptions

154

Packaging non bulk

203

Packaging bulk

241

Transport in bulk according to

Not available.

Annex II of MARPOL 73/78 and

the IBC Code

Transport in bulk according to

Annex II of MARPOL 73/78 and

the IBC Code

Not regulated as dangerous goods.

Material name: GI #775

SDS US

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#### 15. Regulatory information

#### **US federal regulations**

#### CERCLA Hazardous Substance List (40 CFR 302.4)

1,2-Ethanediamine (CAS 107-15-3) 4-Ethylmorpholine (CAS 100-74-3) Listed. Listed.

Morpholine (CAS 110-91-8)

Listed.

#### SARA 304 Emergency release notification

1,2-Ethanediamine (CAS 107-15-3)

5000 LBS

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not listed.

Chemical name

Toxic Substances Control Act (TSCA)

#### Superfund Amendments and Reauthorization Act of 1986 (SARA)

#### SARA 302 Extremely hazardous substance

Reportable quantity (pounds)

Threshold planning quantity (pounds)

Threshold planning quantity, lower value (pounds)

Threshold planning quantity, upper value (pounds)

1,2-Ethanediamine

107-15-3

CAS number

5000

10000

SARA 311/312 Hazardous Yes

chemical

Classified hazard categories

Acute toxicity (any route of exposure)

Skin corrosion or irritation

Serious eye damage or eye irritation

#### SARA 313 (TRI reporting)

Not regulated.

#### Other federal regulations

#### Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

#### Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

1,2-Ethanediamine (CAS 107-15-3)

Safe Drinking Water Act

Not regulated.

(SDWA)

#### US state regulations

#### US. California Controlled Substances. CA Department of Justice (California Health and Safety Code Section 11100)

Morpholine (CAS 110-91-8)

#### US. Massachusetts RTK - Substance List

1,2-Ethanediamine (CAS 107-15-3)

2-Diethylaminoethanol (CAS 100-37-8)

4-Ethylmorpholine (CAS 100-74-3)

Morpholine (CAS 110-91-8)

#### US. New Jersey Worker and Community Right-to-Know Act

1,2-Ethanediamine (CAS 107-15-3)

2-Diethylaminoethanol (CAS 100-37-8)

4-Ethylmorpholine (CAS 100-74-3)

Morpholine (CAS 110-91-8)

Material name: GI #775

SDS US

#### US. Pennsylvania Worker and Community Right-to-Know Law

- 1,2-Ethanediamine (CAS 107-15-3)
- 2-Diethylaminoethanol (CAS 100-37-8)
- 4-Ethylmorpholine (CAS 100-74-3)

Morpholine (CAS 110-91-8)

#### **US. Rhode Island RTK**

- 1,2-Ethanediamine (CAS 107-15-3)
- 2-Diethylaminoethanol (CAS 100-37-8)
- 4-Ethylmorpholine (CAS 100-74-3)
- Morpholine (CAS 110-91-8)

#### **California Proposition 65**

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

1,2-Ethanediamine (CAS 107-15-3)

#### International Inventories

Country(s) or region

Inventory name

On inventory (yes/no)\*

Canada

Domestic Substances List (DSL)

Yes

United States & Puerto Rico

Toxic Substances Control Act (TSCA) Inventory

Yes

\*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

#### 16. Other information, including date of preparation or last revision

#### Issue date

#### Version#

Severe 4
Serious 3
Moderate 2
Slight 1
Minimal 0

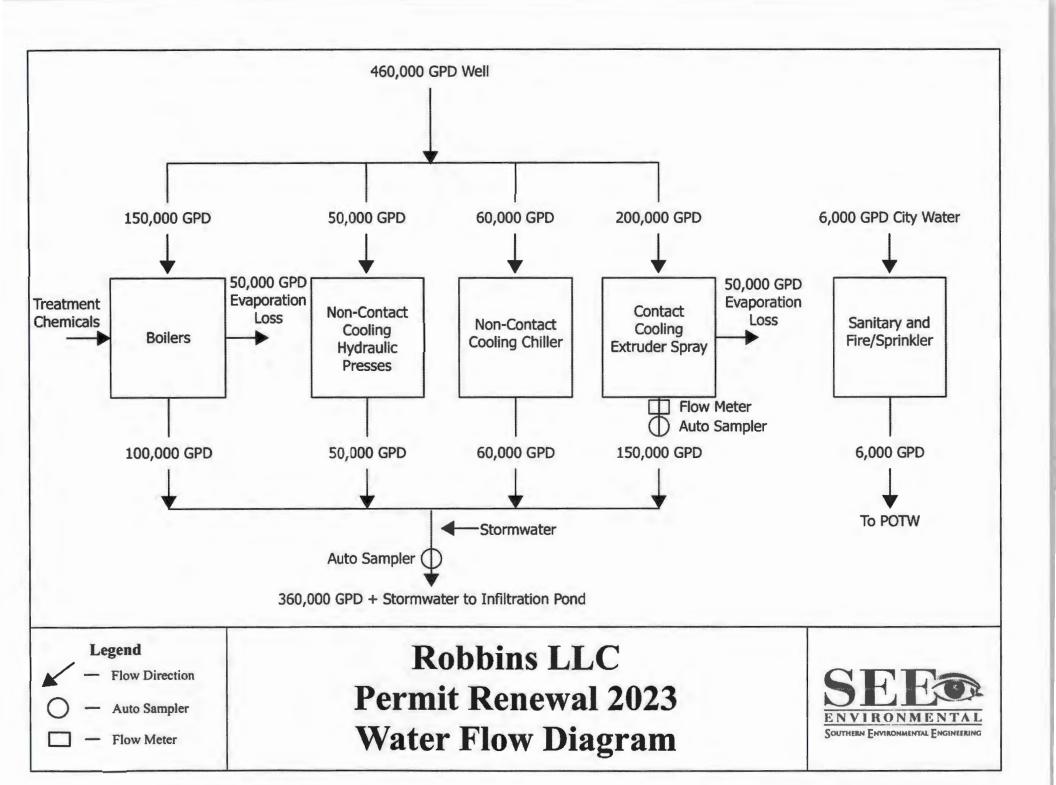
02-25-2021

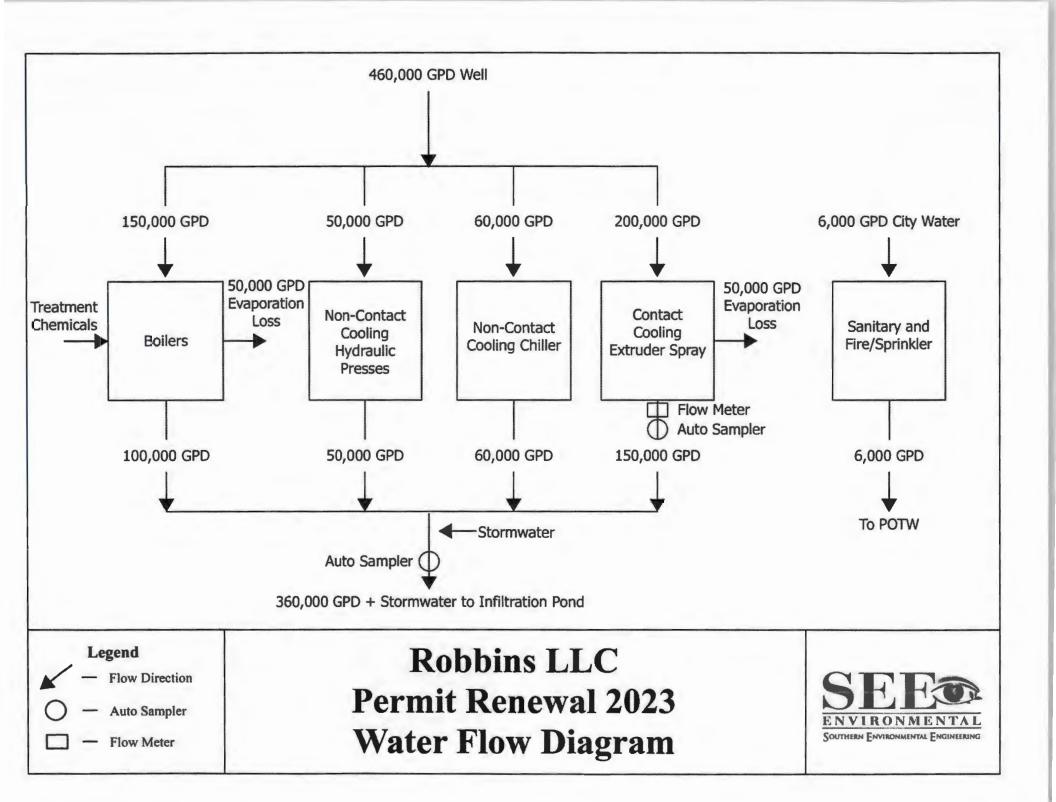
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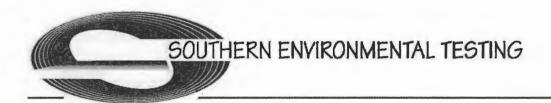


Disclaimer

Not available.







February 22, 2024

Eric Curtis Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630

aylor levell

We appreciate the opportunity to provide our services to you on this project. Please find attached the data for the sample(s) listed below:

Lab ID	Sample Description	Date Collected	Date Submitted
FE00413-01	Robbins - DSN001 Upstream	02/15/2024	02/15/2024
FE00413-02	Robbins - DSN001 Downstream	02/15/2024	02/15/2024

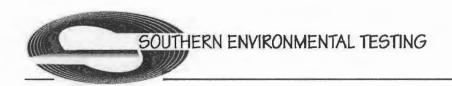
This cover page and the attached chain-of-custody record(s) are integral parts of your report. Southern Environmental Testing considers this report your official record. This information shall remain in Southern Environmental Testing's active database for a period of one (1) calendar year before archiving. Any replacement of this information after archiving may result in an administrative fee to cover the cost of retrieval.

If you have any questions or would like more information regarding these analyses, please call our Decatur facility at (256) 280-2567 or our Florence facility at (256) 740-5532.

Taylor Terrell

Project Manager

Reviewed by:



#### SAMPLE RESULTS REPORT

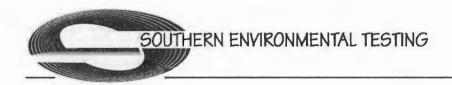
Report Date/Time: 02/22/2024 13:29

REPORT TO

Eric Curtis
Southern Environmental Engineering
1222 Helton Dr
Florence, AL 35630

This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.

Analyte Name		Result	Units	Qualifer	Regulatory Limit
Sample Point: Robbins - DSN001 Upst	Sample ID: FE00413-01	Collected:	02/15/2024	Submitted:	02/15/2024
Microbiological					
E. coli		10	MPN/100 mL		
Sample Point: Robbins - DSN001 Dow	Sample ID: FE00413-02	Collected:	02/15/2024	Submitted:	02/15/2024
Microbiological					
E. coli		10	MPN/100 mL		



#### SAMPLE RESULTS REPORT

Report Date/Time: 02/22/2024 13:29

REPORT TO

Eric Curtis Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630 This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.

All calculations are performed prior to rounding per EPA and *Standard Methods* requirements. Calibration data for field analyses conducted by SET or *ENERSOLV* personnel are available upon request.

#### **Data Qualifiers**

< Less than reporting limit

#### **Analysis Information**

Lab Number	Analysis	Referenced Method	Analyst	SET Facility		Collection Analysis Date/Time Start Date/Time		Analysis End Date/Time (BOD, CBOD, Coliforms)
FE00413-01	E. coli	Colilert/SM9223B-04	FLY	SET-Florence	02/15/2024	12:52	02/15/2024 14:20	02/16/2024 14:38
FE00413-02	E. coli	Colilert/SM9223B-04	FLY	SET-Florence	02/15/2024	12:56	02/15/2024 14:20	02/16/2024 14:38

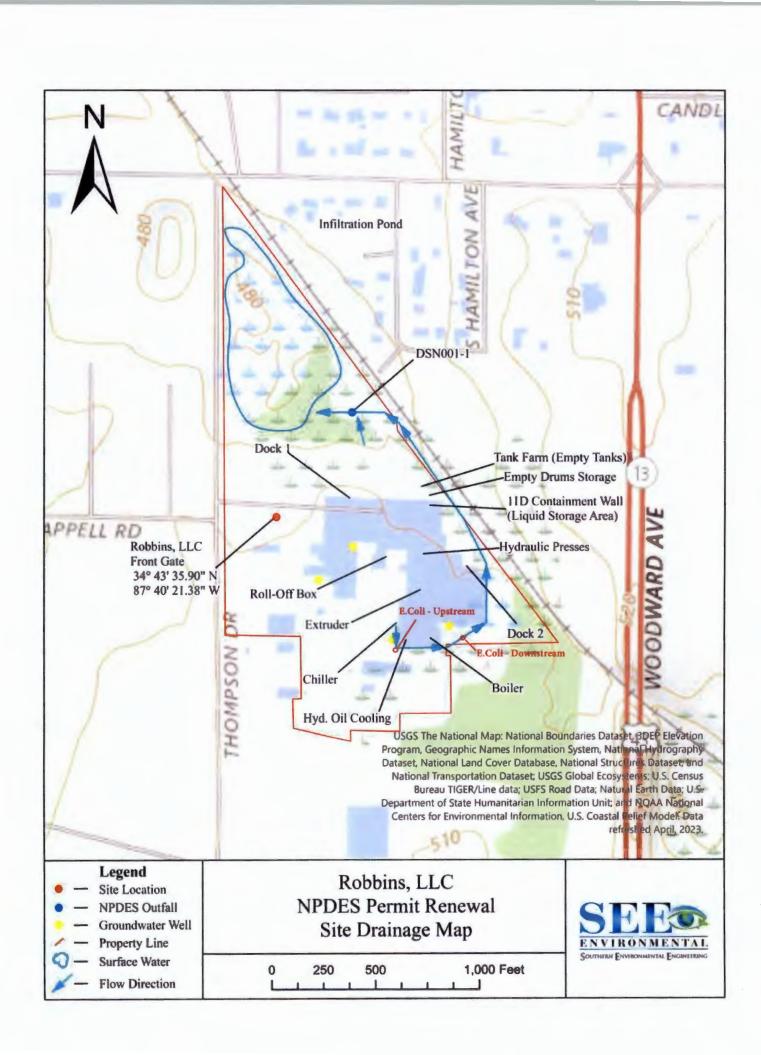
## SET

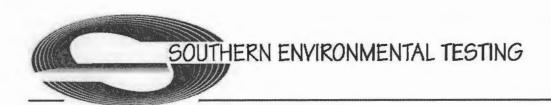
#### SOUTHERN ENVIRONMENTAL TESTING

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD 2919 FAIRGROUND ROAD SW, DECATUR, AL 35603 3103 NORTHINGTON COURT, FLORENCE, AL 35630

	PAGE	1	of	1
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October 27, 2023

Eric Curtis Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630

aylor levell

We appreciate the opportunity to provide our services to you on this project. Please find attached the data for the sample(s) listed below:

Lab ID	Sample Description	Date Collected	Date Submitted
FD02380-01	DSN0011 Grab- Robbins LLC Permit I	10/20/2623	10/20/2023

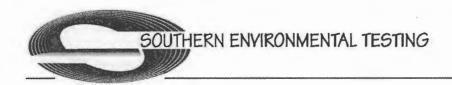
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If you have any questions or would like more information regarding these analyses, please call our Decatur facility at (256) 280-2567 or our Florence facility at (256) 740-5532.

Taylor Terrell

Project Manager

Reviewed by:



#### SAMPLE RESULTS REPORT

Report Date/Time: 10/27/2023 08:44

REPORT TO

**Eric Curtis** Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630

This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.

Analyte Name	Result	Units	Qualifer	Regulatory Limit

Sample Point: DSN0011 Grab- Robbin

Sample ID: FD02380-01

Collected: 10/20/2023

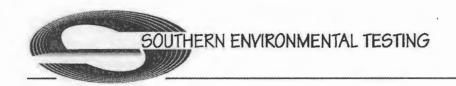
Submitted: 10/20/2023

Microbiological

Fecal Coliform

3650

MPN/100 mL



#### SAMPLE RESULTS REPORT

Report Date/Time: 10/27/2023 08:44

REPORT TO

Eric Curtis Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630 This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.

All calculations are performed prior to rounding per EPA and *Standard Methods* requirements. Calibration data for field analyses conducted by SET or *ENERSOLV* personnel are available upon request.

#### **Data Qualifiers**

< Less than reporting limit

#### **Analysis Information**

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time		Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)	
FD02380-01	Fecal Coliform	Colilert 18/SM9223B-04	FLY	Florence	10/20/2023	13:08	10/20/2023 14:04	10/21/2023 08:04	



# SOUTHERN ENVIRONMENTAL TESTING ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD 2919 FAIRGROUND ROAD SW, DECATUR, AL 35603 3103 NORTHINGTON COURT, FLORENCE, AL 35630 (256) 350-0846

PAGE	1	of	1
Robbins LLC F	Permit	Rene	wal
<b>EPA Form</b>	2C Ta	ble C	:

SEE		CLIENT	P.O. NUMBER	(256) 35U-L	V PROJECT	WWW.S	etesti	ng.co	111							
SEE											REC	UEST	ED AN	ALYSE	S	
CLIENT POINT OF CONTAC	T .	CLIENT PHYSICAL	ADDRESS	CITY/STA*	E/ZIP							T				
Eric Curtis		1222 Helton I		Florence	e, AL 35	630										
CLIENT EMAIL		PHONE NUMBER	OTHER INFORM	ATION					_							
ecurtis@see-env.co	<u>m</u>	256-443-8306	VALUE OF STREET	7.551.6.6504.46145					E						1	
Tommy Road J	Da is			RT DELIVERY (SUR	CHARGE)				Coliform							
	Dennis	h	ATE DUE (REQUI	SAMPLE	SAM	PIF	1	1	0							
SET LAB NUMBER	SA	MPLE DESCRIPTI		RANSFER/GRAB DATE		R/GRAB	GRAB	СОМР	Fecal							
FD02380-01	DSN0011	(Grab)	10	0/20/2023	130	8	Х		Х							
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SET-001-FLD REV. 0

NPDES Permit Number **EPA Identification Number** Facility Name Form Approved 03/05/19 OMB No. 2040-0004 Robbins, LLC ALD004002655 AL0069931 U.S. Environmental Protection Agency **Form** Application for NPDES Permit to Discharge Wastewater **SEPA NPDES GENERAL INFORMATION** SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(f) and (f)(1)) 1.1 Applicants Not Required to Submit Form 1 Is the facility a new or existing publicly owned Is the facility a new or existing treatment works 1.1.1 1.1.2 treatment works? treating domestic sewage? If yes, STOP. Do NOT If yes, STOP. Do NOT complete No  $\overline{\mathbf{A}}$ No Form 1. Complete Form 2A. complete Form 1. Complete Form 2S. 1.2 Applicants Required to Submit Form 1 1.2.1 Is the facility a concentrated animal feeding 1.2.2 Is the facility an existing manufacturing, Activities Requiring an NPDES Permit operation or a concentrated aquatic animal commercial, mining, or silvicultural facility that is production facility? currently discharging process wastewater? Yes → Complete Form 1 Yes → Complete Form □ No and Form 2B. 1 and Form 2C. 1.2.3 Is the facility a new manufacturing, commercial, 1.2.4 Is the facility a new or existing manufacturing, mining, or silvicultural facility that has not yet commercial, mining, or silvicultural facility that commenced to discharge? discharges only nonprocess wastewater? Yes → Complete Form 1 Yes → Complete Form No and Form 2D. 1 and Form 2E. Is the facility a new or existing facility whose 1.2.5 discharge is composed entirely of stormwater associated with industrial activity or whose discharge is composed of both stormwater and non-stormwater? Yes → Complete Form 1 No and Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). SECTION 2, NAME, MAILING ADDRESS, AND LOCATION (40 CFR 122.21(f)(2)) 2.1 **Facility Name** Robbins, LLC Name, Mailing Address, and Location 22 **EPA Identification Number** ALD004002655 2.3 **Facility Contact** Name (first and last) Title Phone number (256) 383-5441 Terry Elgin Managing Director Email address terry.elgin@hexpol.com 2.4 **Facility Mailing Address** Street or P.O. box 3415 Thompson Street ZIP code City or town State 35661 AL Muscle Shoals

	Aldentifica	otion Number	NPDES Permit Number AL0069931	er	Facility Name Robbins, LLC	Form Approved 03/05/19 OMB No. 2040-0004
	2.5	Facility Location				
Name, Mailing Address, and Location Continued	2.0		ber, or other specific ide	entifier		
Mailing cation C		County name Colbert	Count	y code (if knowr	)	
Name, and Lo		City or town Muscle Shoals	State AL			ZIP code 35661
SECTIO	N 3. SIC	AND NAICS CODI	ES (40 CFR 122.21(f)(3	))		
	3.1	SIC Cod	de(s) Descr	iption (optional	)	
		3069	Fabrica	ated Rubber Pro	ducts, Not Elsewhere	Classified
SIC and NAICS Codes						
N	3.2	NAICS C	ode(s) Descr	ription (optional	)	Mary Mary Wall
SIC a		326299	All Oth	er Rubber Prod	ucts Manufacturing	
SECTION	N 4. OP 4.1	RATOR INFORMA Name of Operate Hexpol Robbins H		(f)(4))		
=	4.2					
ormatio	4.2	✓ Yes □ N	isted in Item 4.1 also the	e owner?		
Ē	4.3	Operator Status				
Operator Information		☐ Public—fede ☑ Private	Other (		Othe	er public (specify)
	4.4	Phone Number	of Operator			
		(256) 383-5441				
_	4.5	Operator Addres	SS			
rmation		Street or P.O. Bo 3415 Thompson S				
Operator Information Continued		City or town Muscle Shoals	State AL			ZIP code 35661
Open		Email address of terry.elgin@hexpo	•			
SECTIO	N 5. INC	DIAN LAND (40 CF	R 122.21(f)(5))			
Indian	5.1	Is the facility loca	ted on Indian Land?			

EP	A Identifica	tion Number	NPDES Permit N	lumber		Facility Name	Form Approved 03/05/19
	ALD0040	002655	AL006993	1		Robbins, LLC	OMB No. 2040-0004
SECTIO	N 6. EXI	STING ENVIRON	IMENTAL PERMITS	(40 CFR 122	.21(f)(6	))	
<u>-</u>	6.1	<b>Existing Envir</b>	onmental Permits (c	heck all that	apply a	nd print or type the co	prresponding permit number for each)
Existing Environmental Permits		NPDES (di water) AL006963	scharges to surface	RCRA	(hazaro	lous wastes)	☐ UIC (underground injection of fluids)
ing Environ Permits		PSD (air er	missions)	☐ Nonatta	ainmen	program (CAA)	☐ NESHAPs (CAA)
			nping (MPRSA)	☐ Dredge	e or fill (	CWA Section 404)	Other (specify)
SECTIO	N 7. MA	P (40 CFR 122.2	1( <u>f)(7))</u>				
Мар	7.1	specific require		p containing	all requ	ired information to th	is application? (See instructions for
		✓ Yes	No CAFO—No	t Applicable	(See re	quirements in Form 2	B.)
SECTIO			ESS (40 CFR 122.21)			allilling and la	
	8.1		ature of your business				
Susiness		allow for the fo		ber products	. Additio	onal polymers are also	with a portion being extruded to mixed and or extruded and provided
Nature of Business							
SECTIO	N 9. CO	OLING WATER I	NTAKE STRUCTURE	S (40 CFR 1	122.21(	7)(9))	The state of the s
	.9.1	Does your facili	ty use cooling water?				
- Se		✓ Yes □	No → SKIP to Item	10.1.			
Cooling Water Intake Structures	9.2	40 CFR 125, Si	ubparts I and J may h ing authority to deterr	ave additiona	al applic	cation requirements at	er intake structure as described at 40 CFR 122.21(r). Consult with your esubmitted and when.)
SECTIO	N 10. VA	RIANCE REQUE	ESTS (40 CFR 122.21	(f)(10))			
sts	10.1						40 CFR 122.21(m)? (Check all that ation needs to be submitted and
Variance Requests		Fundam Section	entally different factor 301(n))	rs (CWA		Water quality related 302(b)(2))	d effluent limitations (CWA Section
Varianc			ventional pollutants (6 301(c) and (g))	CWA		Thermal discharges	(CWA Section 316(a))
		✓ Not appl	icable				

E	PA Identifica		ber NPDES Permit Number AL0069931		Facility Name obbins, LLC	Form Approved 03/05/19 OMB No. 2040-0004
SECTIO	DN 11. C		ST AND CERTIFICATION STATEMENT (40 CF			e submitting with your emplication
	""	Fore	ach section, specify in Column 2 any attachment ot all applicants are required to provide attachment	s that yo		alert the permitting authority. Note
			Column 1			Column 2
		Ø	Section 1: Activities Requiring an NPDES Per	mit [	w/ attachmen	ts
		Ø	Section 2: Name, Mailing Address, and Locat	on [	w/ attachmen	ts
		<b>7</b>	Section 3: SIC Codes		w/ attachmen	ts
		7	Section 4: Operator Information		w/ attachmen	ts
			Section 5: Indian Land		w/ attachmen	ts
ŧ		7	Section 6: Existing Environmental Permits	E	w/ attachmen	ts
Checklist and Certification Statement		Ø	Section 7: Map	Ø	w/ topographi	ic w/ additional attachments
on St		Ø	Section 8: Nature of Business		_	ts
ifficati			Section 9: Cooling Water Intake Structures		w/ attachment	ts
d Cert		Ø	Section 10: Variance Requests		w/ attachment	ts
list an		Ø	Section 11: Checklist and Certification Statem	ent [	w/ attachment	ts
heck	11.2	Certif	ication Statement			
Ö		in acc inform direct belief,	fy under penalty of law that this document and a cordance with a system designed to assure that on ation submitted. Based on my inquiry of the penalty by responsible for gathering the information, the in- true, accurate, and complete. I am aware that the ling the possibility of fine and imprisonment for ka	ualified p son or pe nformation nere are	personnel properly ersons who manag on submitted is, to significant penaltie	gather and evaluate the e the system, or those persons the best of my knowledge and
		Name Terry E	(print or type first and last name) Ilgin		fficial title anaging Director	
		Signa	eny Elyn	Da	ate signed 1/-20	-23



#### Legend

- Site Location
- NPDES Outfall
  - Production
     Well Location
  - Property Line

Robbins, LLC Topographic Map 3415 Thompson Street, Muscle Shoals, AL 35661

0 0.25 0.5 1 Miles



NPDES Permit Number Facility Name Form Approved 03/05/19 **EPA Identification Number** OMB No. 2040-0004 ALD004002655 Robbins, LLC AL0069931 U.S. Environmental Protection Agency Form **SEPA** Application for NPDES Permit to Discharge Wastewater 2C **NPDES** EXISTING MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURE OPERATIONS SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1)) Provide information on each of the facility's outfalls in the table below. Outfall Outfall Location **Receiving Water Name** Latitude Longitude Number w 🔻 DSN001 43.00' 39.15" N T 40.00 **UT to Spring Creek** 34.00° 87.00° 16.24" **SECTION 2. LINE DRAWING (40 CFR 122.21(g)(2))** Have you attached a line drawing to this application that shows the water flow through your facility with a water Line Drawing balance? (See instructions for drawing requirements. See Exhibit 2C-1 at end of instructions for example.) √ Yes ☐ No SECTION 3. AVERAGE FLOWS AND TREATMENT (40 CFR 122.21(g)(3)) For each outfall identified under Item 1.1, provide average flow and treatment information. Add additional sheets if necessary. \*\*Outfall Number\*\* DSN001 **Operations Contributing to Flow** Operation Average Flow Boiler Blowdown 0.100 mgd Average Flows and Treatment **Contact Cooling Water** 0.150 mgd 0.050 mgd Non-Contact Cooling Water Hydro Press 0.060 mgd Non-Contact Cooling Water Chiller **Treatment Units** Final Disposal of Solid or Description Code from **Liquid Wastes Other Than** (include size, flow rate through each treatment unit, Table 2C-1 by Discharge retention time, etc.)

	Identificati LD00400	on Number 02655	NPDES Permit Number AL0069931		lity Name bins, LLC	Form Approved 03/05/19 OMB No. 2040-0004
	3.1		**Outfal	Number** D	SN001	
	cont.			ns Contributi		
			Operation		A	verage Flow
			Stormwater			0.060 mgd
						mgd
						mgd
						mgd
				reatment Un	its	Fi (B)
		(include si	Description ize, flow rate through each treatment u retention time, etc.)	nit,	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
ntinued						
Average Flows and Treatment Continued						
Treat						
and				Number**	and Flow	
ows			Operation	ns Contributi		verage Flow
ge FI						mgd
Avera						mgd
						mgd
						mgd
			0.5	reatment Un	its	
		(include si	Description ize, flow rate through each treatment user retention time, etc.)	init,	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
						-
E L	3.2	Are you apply Yes	ring for an NPDES permit to operate a	privately owne	ed treatment works No → SKIP to S	
System Users	3.3		ached a list that identifies each user of	the treatment	works?	
		☐ Yes			No	

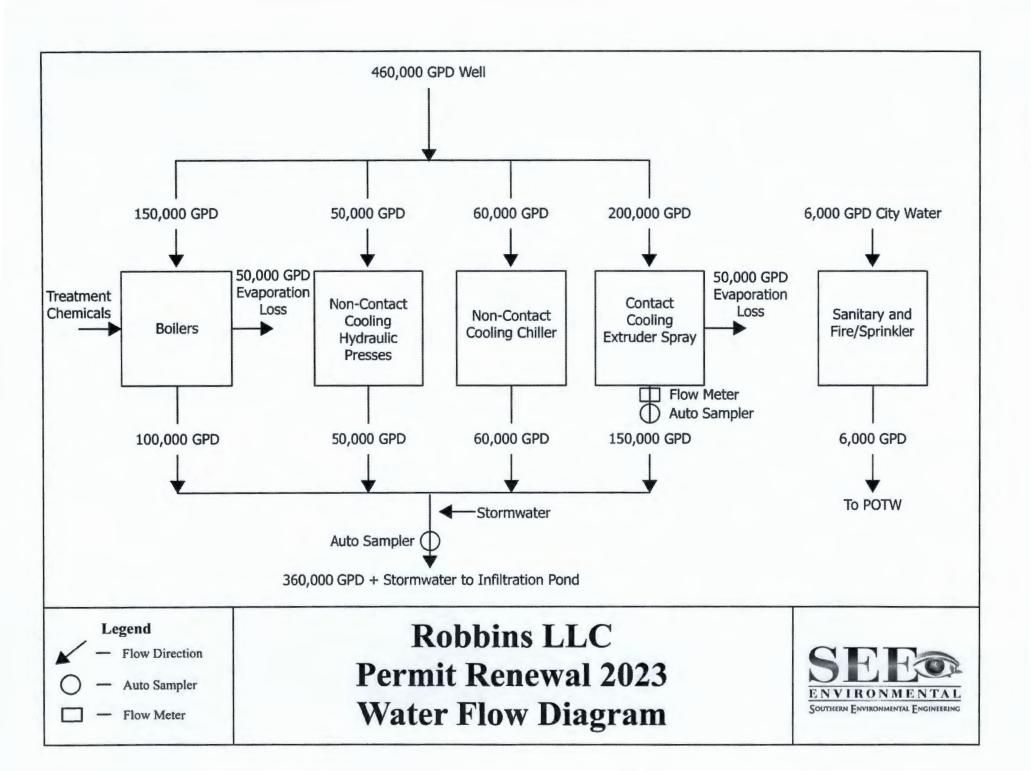
	Identificati LD00400	on Number 02655	NPDES Permit AL00699		Facility Name Robbins, LLC		Form Approved 03/05/19 OMB No. 2040-0004		
SECTIO	N 4. INT	ERMITTENT F	LOWS (40 CFR 122.2	1(g)(4))				10000	
	4.1	Except for si	torm runoff, leaks, or s	pills, are any dischar		tions 1 and 3 inte		sonal?	
	4.2	Provide info	rmation on intermittent	or seasonal flows fo	r each applicable out	fall. Attach addition	onal pages, if no	ecessary.	
		Outfall	Operation		uency	Flow F	Rate		
		Number	(list)	Average Days/Week	Average Months/Year	Long-Term Average	Maximum Daily	Duration	
				days/week	months/year	mgd	mgd	days	
lows				days/week	months/year	mgd	mgd	days	
ttent i				days/week	months/year	mgd	mgd	days	
Intermittent Flows				days/week	months/year	mgd	mgd	days	
트				days/week	months/year	mgd	mgd	days	
				days/week	months/year	mgd	mgd	days	
				days/week	months/year	mgd	mgd	days	
				days/week	months/year	mgd	mgd	days	
				days/week	months/year	mgd	mgd	days	
SECTIO	N 5. PR	DUCTION (40	0 CFR 122.21(g)(5))						
	5.1	Do any efflu	ent limitation guideline	s (ELGs) promulgate	ed by EPA under Sect	ion 304 of the CV	VA apply to you	ur facility?	
		✓ Yes			☐ No → S	SKIP to Section 6.			
9	5.2		following information of						
E		ELC	G Category	[	ELG Subcategory		Regulatory	/ Citation	
Applicable ELGs		Rubber Man	ufacturing Point Sour	Small -Sized General	Molded, Extruded, a	nd Fabricated Ru	40 CFR 428,	Subpart E	
Appl	. 1								
	5.3		ne applicable ELGs ex	pressed in terms of p		easure of operation 6.			
ions		✓ Yes							
ital	5.4		actual measure of daily	production expresse	ed in terms and units	of applicable ELC		I luit of	
ed Lin		Outfall Number	Opera	tion, Product, or Ma	aterial	Quantity p	ar i iav	Unit of Measure	
Production-Based Limitations		DSN001	Ext	truded Rubber Produ	cts	8,000		lbs/day	
roducti									
0									

	Identificati ALD0040	on Number 02655	NPDES Permit Number AL0069931	Facility Nan Robbins, L		Form Approved 03/05/19 OMB No. 2040-0004		
SECTIO	N 6. IMP	ROVEMENTS	(40 CFR 122.21(g)(6))		NET I			
	6.1	Are you pres upgrading, o	ently required by any federal, st r operating wastewater treatmer charges described in this applic	nt equipment of	r practices or		nvironmental prograr	
	6.2		fy each applicable project in the	table below		2 0/11/10/1		
nts	0.2	briefly identif	y each applicable project in the	Affected			Final Comp	liance Dates
eme		Brief Identi	fication and Description of	Outfalls		urce(s) of	· ·	
prov			Project	(list outfall number)	"	ischarge	Required	Projected
Upgrades and Improvements								
Upgrad								
	6.3		ached sheets describing any ad act your discharges) that you no					ntal projects
		☐ Yes		No		<b>V</b>	Not applicable	
SECTIO	N 7. EFF	LUENT AND I	NTAKE CHARACTERISTICS (4	0 CFR 122.21	(g)(7))		T- 1/20	0.00
	comple	ete. Not all appl A. Convention	o determine the pollutants and pricants need to complete each ta al and Non-Conventional Pollinesting a waiver from your NPDE	ble. utants				
		your outfalls			_			
		Yes				SKIP to Ite		11 (1
	7.2		te the applicable outfalls below.					
			all Number					-
Effluent and Intake Characteristics	7.3	requested ar	mpleted monitoring for all Table nd attached the results to this ap	plication packs	2002			
ract		✓ Yes			perm	itting authori	been requested from ty for all pollutants at	all outfalls.
Cha			s, Cyanide, Total Phenols, and					
I Intake	7.4		e facility's processes that contrib bit 2C-3? (See end of instruction					categories
and		✓ Yes				SKIP to Ite		
nen	7.5	Have you ch	ecked "Testing Required" for all	toxic metals, c	yanide, and	total phenols	in Section 1 of Table	e B?
<b>E</b>		✓ Yes			☐ No			
	7.6	List the appli	cable primary industry categorie -3.	es and check th	e boxes indi			
			Primary Industry Category				GC/MS Fraction(s) applicable boxes.)	
			Rubber Processing		✓ Volatile	☑ Acid	☑ Base/Neutral	☐ Pesticide
					□ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide
					☐ Volatile	☐ Acid	□ Base/Neutral	☐ Pesticide

ALD00400		AL0069931		obins, LLC	OMB No. 2040-00
7.7	GC/MS fract	ecked "Testing Required" for all required pions checked in Item 7.6?	pollutants i	n Sections 2 throu	gh 5 of Table B for each of the
	✓ Yes			No	
7.8	where testing	ecked "Believed Present" or "Believed Ab g is not required?	sent" for al		n Sections 1 through 5 of Table B
	✓ Yes			No	
7.9	required or ( indicated are	ovided (1) quantitative data for those Sect 2) quantitative data or other required infor "Believed Present" in your discharge?		those Section 1, T	
	✓ Yes			No	
7.10		plicant qualify for a small business exemp		the criteria specific	ed in the instructions?
	□ Yes →	Note that you qualify at the top of Table then SKIP to Item 7.12.	B,	No	
7.11	determined t	ovided (1) quantitative data for those Sect esting is required or (2) quantitative data on the have indicated are "Believed Present" in	or an expla	nation for those S	
	✓ Yes			No.	
Table (		ventional and Non-Conventional Pollu	tante	110	
7.12		dicated whether pollutants are "Believed P		"Believed Absent"	for all pollutants listed on Table C
	for all outfalls			Donottou / Booth	to an ponatanto notos on rabio o
	✓ Yes			No	
7.13		mpleted Table C by providing (1) quantita an ELG and/or (2) quantitative data or an o esent"?			
	✓ Yes			No	
Table I	D. Certain Haz	ardous Substances and Asbestos			
7.14	Have you incall outfalls?	dicated whether pollutants are "Believed P	resent" or	"Believed Absent"	for all pollutants listed in Table D
	✓ Yes			No	
7.15		mpleted Table D by (1) describing the rea roviding quantitative data, if available?	sons the a	pplicable pollutant	s are expected to be discharged
	✓ Yes			No	
Table F	. 2,3,7,8-Tetra	achlorodibenzo-p-Dioxin (2,3,7,8-TCDD	)		
7.16		ility use or manufacture one or more of the reason to believe that TCDD is or may be			sted in the instructions, or do you
	☐ Yes →	Complete Table E.	<b>V</b>	No → SKIP to	Section 8.
7.17	Have you co	mpleted Table E by reporting qualitative of	data for TC	DD? No	
N 8 USE		ACTURED TOXICS (40 CFR 122.21(g)(	9))	VEN SE	THE REST OF THE PERSON NAMED IN
8.1	Is any polluta	ant listed in Table B a substance or a com ate or final product or byproduct?		a substance used	or manufactured at your facility as
	☐ Yes	2. 2a. p	7	No → SKIP to	Section 9.
8.2	List the pollu	tants below.			
8.2					
	1.	4.		7	•
	2.	5.		8	3.
	3.	6.		9	).

ALD00		114111411	DES Permit Number AL0069931	Facility Name Robbins, LLC	Form Approved 03/05. OMB No. 2040-00				
CTION 9.	BIOLO	OGICAL TOXICITY TEST	S (40 CFR 122.21(g)(11))						
9.	1	Do you have any knowle	dge or reason to believe that ar	ny biological test for acute or chron or (2) on a receiving water in relat ✓ No → SKIP to Section	tion to your discharge?				
9.	2	Identify the tests and the	ir purposes below.						
Biological Toxicity Tests		Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted				
gical				☐ Yes ☐ No					
BIOIG				☐ Yes ☐ No					
				☐ Yes ☐ No					
		TRACT ANALYSES (40	The state of the s						
10			s reported in Section 7 perform	ed by a contract laboratory or cons					
		✓ Yes		No → SKIP to Section 11.					
10	.2	Provide information for e	ach contract laboratory or cons	ulting firm below.					
1			Laboratory Number 1	Laboratory Number 2	Laboratory Number :				
		Name of laboratory/firm	Waypoint Analytical	Southern Environmental Testing, Inc.					
Contract Analyses		Laboratory address	2790 Whitten Road, Memphis, TN 38133	3103 Northington Court, Florence, AL 35630					
Conne		Phone number	(901) 213-2400	(256) 740-5532					
		Pollutant(s) analyzed	All parameters except Fecal Coliform	Fecal Coliform					
TION 11	ADD	HTIONAL INFORMATION	N (40 CFR 122.21(g)(13))						
11	-	THE RESERVE AND DESCRIPTION OF THE PERSON NAMED IN COLUMN 2 IN COL	ng authority requested addition	al information?					
		☐ Yes		✓ No → SKIP to Section	on 12.				
11	.2	List the information reque	ested and attach it to this applic	cation.					
at into		1.		4.					
Additional Information		2.		5.					
1		3.		6.					

	Identification		NPDES Permit Numbe AL0069931	f	Facility Name Robbins, LLC		Form Approved 03/05/19 OMB No. 2040-0004
SECTIO	N 12. CH	IECKLIST AN	D CERTIFICATION STATEM	MENT (	40 CFR 122.22(a) and (d))		
	12.1	In Column 1 For each se	below, mark the sections of ction, specify in Column 2 an	Form 2 y attac	2C that you have completed a hments that you are enclosing all sections or provide attaching	g to alert the	
			Column 1		**************************************	Column 2	
		☑ Sectio	n 1: Outfall Location		w/ attachments		
		✓ Section	n 2: Line Drawing	Ø	w/ line drawing		w/ additional attachments
		Section Treatm	n 3: Average Flows and nent		w/ attachments		w/ list of each user of privately owned treatment works
		✓ Section	n 4: Intermittent Flows		w/ attachments		
		✓ Section	n 5: Production		w/ attachments		
-		☑ Section	n 6: Improvements		w/ attachments		w/ optional additional sheets describing any additional pollution control plans
					w/ request for a waiver and supporting information		w/ explanation for identical outfalls
temen					w/ small business exemption request		w/ other attachments
n Sta			n 7: Effluent and Intake cteristics	Ø	w/ Table A	<b>V</b>	w/ Table B
ficatio				Ø	w/ Table C	V	w/ Table D
Certi					w/ Table E	Ø	w/ analytical results as an attachment
st and		Section Toxics	n 8: Used or Manufactured		w/ attachments		
Checklist and Certification Statement		Section Tests	n 9: Biological Toxicity		w/ attachments		
O		✓ Section	n 10: Contract Analyses		w/ attachments		
		✓ Section	n 11: Additional Information		w/ attachments		
			n 12: Checklist and cation Statement		w/ attachments		
	12.2	I certify und accordance submitted. E responsible accurate, ar	n Statement er penalty of law that this doc with a system designed to as Based on my inquiry of the pe for gathering the information,	rson of the in there	and all attachments were pre hat qualified personnel proper r persons who manage the sy formation submitted is, to the are significant penalties for sul violations.	ly gather and stem, or thos best of my kn	evaluate the information e persons directly nowledge and belief, true,
		-	or type first and last name)			Official title	
		Terry Elgin				Managing Di	irector
		Signature	my Ele	~	•	Date signed	20-23



### Robbins LLC On-site Private Well Information

Robbins LLC extracts approximately 0.460 MGD from four (4) on-site wells. These wells are plumbed into the same water system and are not metered individually.

#### Well 1

Well Depth: Est 100' Lat: 34° 43' 33.59" N Long: 87° 40' 19.37" W

#### Well 2

Well Depth: Est 100' Lat: 34° 43' 34.89" N Long: 87° 40' 17.21" W

#### Well 3

Well Depth: Est 120' Lat: 34° 43' 31.08" N Long: 87° 40' 15.75" W

#### Well 4

Well Depth: Est 160' Lat: 34° 43' 31.84" N Long: 87° 40' 13.22" W This page intentionally left blank.

Outfall Number

NPDES Permit Number AL0069931

**EPA Identification Number** 

ALD004002655

Facility Name Robbins, LLC

DSN001

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

4	LE A. CONVENTIONAL AND N						fluent		Intal	
	Pollutant	Waiver Requested (if applicable)	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
	Check here if you have applied	to your NPDE	S permitting author	ity for a wai	iver for all of the p	ollutants listed on	this table for the not	ed outfall.		
	Biochemical oxygen demand		Concentration	mg/L	<5	<5	NA	1		
1.	(BOD₅)		Mass	ppd	0	0	NA	1		
^	Chemical oxygen demand		Concentration	mg/L	20	20	2.92	12		
2.	(COD)	Ш	Mass	ppd	70.01	70.01	10.21	12		
2	Total assenie cashon (TOC)		Concentration	mg/L	6.68	6.68	2.11	12		
3.	Total organic carbon (TOC)	Ш	Mass	ppd	23.38	23.38	1.23	12		
,	Tatal auranadad salida (TCC)		Concentration	mg/L	64	64	14.75	12		
4.	Total suspended solids (TSS)		Mass	ppd	264.37	264.37	55.91	12		
_	Ammonia (as N)		Concentration	mg/L	<0.100	<0.100	NA	1		
5.	Ammonia (as N)		Mass	ppd	0	0	NA	1		
6.	Flow		Rate	GPD	578,000	578,000	452,458	12		
7	Temperature (winter)		°C	°C	20.3	20.3	19.3	3		
7.	Temperature (summer)		°C	°C	23.4	23.4	21.3	3		
0	pH (minimum)		Standard units	s.u.	7.77	NA	NA	12		
8.	pH (maximum)		Standard units	s.u.	8.2	NA	NA	12		

<sup>1</sup> 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 Form 3510-2C (Revised 3-19) Page 9



NPDES Permit Number **Facility Name EPA Identification Number Outfall Number** Form Approved 03/05/19 OMB No. 2040-0004 Robbins, LLC ALD004002655 AL0069931 DSN0011 TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))1 Presence or Absence Intake (check one) Effluent (optional) Testing Pollutant/Parameter Units Long-Term Maximum Maximum Long-Believed Believed Number (and CAS Number, if available) Required (specify) Average Number Daily Monthly Term Present Absent of of Daily Average Discharge Discharge **Analyses Analyses** Discharge (if available) (required) Value (if available) Check here if you qualify as a small business per the instructions to Form 2C and, therefore, do not need to submit quantitative data for any of the organic toxic pollutants in Sections 2 through 5 of this table. Note, however, that you must still indicate in the appropriate column of this table if you believe any of the pollutants listed are present in your discharge. Section 1, Toxic Metals, Cyanide, and Total Phenols Concentration mg/L < 0.0100 NA NA 1 Antimony, total **V**  $\checkmark$ 1.1 (7440-36-0)Mass ppd 0 NA NA 1 Concentration mg/L < 0.0100 NA NA 1 Arsenic, total 1  $\checkmark$ (7440 - 38 - 2)Mass ppd 0 NA NA 1 Concentration < 0.0010 1 mg/L NA NA Beryllium, total  $\checkmark$ **V** (7440-41-7)Mass ppd 0 1 NA NA NA 1 Concentration mg/L < 0.0020 NA Cadmium, total 1 1 (7440-43-9)Mass NA 1 ppd 0 NA NA 1 Concentration mg/L < 0.0050 NA Chromium, total V 1 1.5 (7440-47-3)Mass NA 1 ppd 0 NA Concentration < 0.0050 mg/L NA NA 1 Copper, total 1 1 (7440-50-8)Mass NA 1 0 NA ppd NA 1 Concentration NA mg/L < 0.0060 Lead, total 1  $\overline{\mathbf{V}}$ (7439 - 92 - 1)Mass ppd NA NA 1 0 NA 1 Concentration mg/L < 0.00020 NA Mercury, total 1 1 (7439-97-6)Mass 0 NA ppd NA 1 Concentration mg/L < 0.0050 NA NA 1 Nickel, total  $\checkmark$ 1 (7440-02-0)Mass NA NA 1 ppd 0 1 Concentration NA mg/L < 0.0100 NA Selenium, total 1 1 (7782-49-2)Mass 0 NA 1 ppd NA Silver, total Concentration mg/L < 0.0050 NA NA 1 V  $\checkmark$ 1.11 (7440-22-4)

Mass

ppd

0

NA

NA

1

lumber Form Approved 03/05/19 O11 OMB No. 2040-0004

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EPA Identification Number NPDES Permit Number Facility Name Outfall Number Robbins, LLC DSN0011

ABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))<sup>1</sup>

	ALD004002655	AL00	69931		RODDINS, LLC			DSN0011			ONDIV	0. 2040-0004
ABLI	E B. TOXIC METALS, CYANIDE	, TOTAL PHE	Presence	ORGANIC T or Absence ck one)	OXIC POLLUTAN	TS (40 <b>CF</b>	R 122.21(g)(7)	(v)) <sup>1</sup> Effl	uent			take tional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
1.12	Thallium, total	Ø		Ø	Concentration	mg/L	<0.0200	NA	NA	1		
1,12	(7440-28-0)				Mass	ppd	0	NA	NA	1		
1.13	Zinc, total	<b>V</b>			Concentration	mg/L	<0.0200	NA	NA	1		
1.10	(7440-66-6)				Mass	ppd	0	NA	NA	1		
1.14	Cyanide, total				Concentration	mg/L	<0.005	NA	NA	1		
	(57-12-5)		_		Mass	ppd	0	NA	NA	1		
1.15	Phenols, total				Concentration	mg/L	<0.0050	NA	NA	1		
					Mass	ppd	0	NA	NA	1		
Section	on 2. Organic Toxic Pollutants	(GC/MS Fract	ion—voiatii	e Compound			T			Τ .	1	
2.1	Acrolein (107-02-8)			V	Concentration Mass	ug/L	<20.0	NA	NA	1		
					Concentration	ppd	0	NA	NA NA	1		
2.2	Acrylonitrile (107-13-1)	✓		<b>V</b>	Mass	ug/L ppd	<20.0	NA NA	NA NA	1		
					Concentration	ug/L	<1.00	NA NA	NA NA	1		
2.3	Benzene (71-43-2)	✓		$   \overline{\checkmark} $	Mass	ppd	0	NA NA	NA NA	1		
-					Concentration	ug/L	<1.00	NA NA	NA NA	1		
2.4	Bromoform (75-25-2)	$\overline{\mathbf{V}}$			Mass	ppd	0	NA NA	NA	1		
	Carbon tetrachloride				Concentration	ug/L	<1.00	NA NA	NA NA	1		
2.5	(56-23-5)	✓		V	Mass	ppd	0	NA	NA	1		
	Chlorobenzene	_			Concentration	ug/L	<1.00	NA	NA	1		
2.6	(108-90-7)	✓		✓	Mass	ppd	0	NA	NA	1		
	Chlorodibromomethane				Concentration	ug/L	<1.00	NA	NA	1		
2.7	(124-48-1)			✓	Mass	ppd	0	NA	NA	1		
	Chloroethane				Concentration	ug/L	<1.00	NA	NA	1		
2.8	(75-00-3)			V	Mass	ppd	0	NA	NA	1		

EPA Form 3510-2C (Revised 3-19)

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

EPA Identification Number NPDES Permit Number Facility Name Outfall Number ALD004002655 AL0069931 Robbins, LLC DSN0011

ADL	E B. TOXIC METALS, CYANIDE,		Presence	or Absence ck one)				Effl	uent			take tional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	(,		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
2.9	2-chloroethylvinyl ether	Ø		V	Concentration	ug/L	<1.00	NA	NA	1		
2.5	(110-75-8)				Mass	ppd	0	NA	NA	1		
2.10	Chloroform (67-66-3)			V	Concentration	ug/L	<1.00	NA	NA	1		
2.10	Chilorolotti (07-00-5)				Mass	ppd	0	NA	NA	1		
2.11	Dichlorobromomethane			V	Concentration	ug/L	<1.00	NA	NA	1		
2.11	(75-27-4)				Mass	ppd	0	NA	NA	1		
2.12	1,1-dichloroethane			✓	Concentration	ug/L	<1.00	NA	NA	1		
2.12	(75-34-3)				Mass	ppd	0	NA	NA	1		
2.13	1,2-dichloroethane	<b>V</b>		V	Concentration	ug/L	<1.00	NA	NA	1		
2.13	(107-06-2)				Mass	ppd	0	NA	NA	1		
2.14	1,1-dichloroethylene			V	Concentration	ug/L	<1.00	NA	NA	1		
2.14	(75-35-4)				Mass	ppd	0	NA	NA	1		
0.45	1,2-dichloropropane			V	Concentration	ug/L	<1.00	NA	NA	1		
2.15	(78-87-5)	V			Mass	ppd	0	NA	NA	1		
0.40	1,3-dichloropropylene			V	Concentration	ug/L	<1.00	NA	NA	1		
2.16	(542-75-6)	V			Mass	ppd	0	NA	NA	1		
0.47	Ethylbenzene	V		V	Concentration	ug/L	<1.00	NA	NA	1		
2.17	(100-41-4)	V		V	Mass	ppd	0	NA	NA	1		
0.40	Methyl bromide	V		V	Concentration	ug/L	<1.00	NA	NA	1		
2.18	(74-83-9)	V			Mass	ppd	0	NA	NA	1		
2.40	Methyl chloride	7		V	Concentration	ug/L	<1.00	NA	NA	1		
2.19	(74-87-3)	- V			Mass	ppd	0	NA	NA	1		
2 20	Methylene chloride	V		V	Concentration	ug/L	<1.00	NA	NA	1		
2.20	(75-09-2)	V V		V	Mass	ppd	0	NA	NA	1		
2.24	1,1,2,2- tetrachloroethane	V		V	Concentration	ug/L	<1.00	NA	NA	1		
2.21	(79-34-5)			V	Mass	ppd	0	NA	NA	1		

EPA Identification Number
ALD004002655

NPDES Permit Number
AL0069931

Facility Name Robbins, LLC

Outfall Number DSN0011

	ALD004002033	ALUU	69931				and the second	DSN0011				
TABLE	B. TOXIC METALS, CYANIDE	, TOTAL PHE			OXIC POLLUTAN	TS (40 CF	R 122.21(g)(7)	(v)) <sup>1</sup>			2000	18 2
				or Absence ck one)			E		uent			take tional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
2.22	Tetrachloroethylene			V	Concentration	ug/L	<1.00	NA	NA	1		
	(127-18-4)				Mass	ppd	0	NA	NA	1		
2.23	Toluene			✓	Concentration	ug/L	<5.00	NA	NA	1		
2.20	(108-88-3)				Mass	ppd	0	NA	NA	1		
2.24	1,2-trans-dichloroethylene				Concentration	ug/L	<1.00	NA	NA	1		
	(156-60-5)				Mass	ppd	0	NA	NA	1		
2.25	1,1,1-trichloroethane			✓	Concentration	ug/L	<1.00	NA	NA	1		
	(71-55-6)				Mass	ppd	0	NA	NA	1		
2.26	1,1,2-trichloroethane			✓	Concentration	ug/L	<1.00	NA	NA	1		
2.20	(79-00-5)				Mass	ppd	0	NA	NA	1		
2.27	Trichloroethylene			V	Concentration	ug/L	<1.00	NA	NA	1		
2.21	(79-01-6)				Mass	ppd	0	NA	NA	1		
2.28	Vinyl chloride	V		V	Concentration	ug/L	<1.00	NA	NA	1		
	(75-01-4)				Mass	ppd	0	NA	NA	1		
Section	on 3. Organic Toxic Pollutants	(GC/MS Fract	ion—Acid C	compounds)	T							
3.1	2-chlorophenol			✓	Concentration	ug/L	<25.0	NA	NA	1		
	(95-57-8)	_	_		Mass	ppd	0	NA	NA	1		
3.2	2,4-dichlorophenol			V	Concentration	ug/L	<25.0	NA	NA	1		
	(120-83-2)				Mass	ppd	0	NA	NA	1		
3.3	2,4-dimethylphenol				Concentration	ug/L	<25.0	NA	NA	1		
	(105-67-9)				Mass	ppd	0	NA	NA	1		
3.4	4,6-dinitro-o-cresol			✓	Concentration	ug/L	<50.0	NA	NA	1		
•••	(534-52-1)				Mass	ppd	0	NA	NA	1		
3.5	2,4-dinitrophenol			✓	Concentration	ug/L	<100	NA	NA	1		
0.0	(51-28-5)				Mass	ppd	0	NA	NA	1		

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ALD004002655

NPDES Permit Number
AL0069931

Facility Name Robbins, LLC Outfall Number DSN0011

		ALUU	69931				-	DZNOOTI				
TABL	E B. TOXIC METALS, CYANIDE	, TOTAL PHE			OXIC POLLUTAN	TS (40 CF	R 122.21(g)(7)	(v)) <sup>1</sup>	and other states			
				or Absence k one)				Effl	uent			take tional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Numbe of Analyse
3.6	2-nitrophenol	V			Concentration	ug/L	<25.0	NA	NA	1		
3.0	(88-75-5)				Mass	ppd	0	NA	NA	1		
3.7	4-nitrophenol	V		V	Concentration	ug/L	<50.0	NA	NA	1		
3.1	(100-02-7)				Mass	ppd	0	NA	NA	1		
3.8	p-chloro-m-cresol	Ø		V	Concentration	ug/L	<25.0	NA	NA	1		
3.0	(59-50-7)	IV.			Mass	ppd	0	NA	NA	1		
3.9	Pentachlorophenol	V		V	Concentration	ug/L	<25.0	NA	NA	1		
3.9	(87-86-5)				Mass	ppd			NA	1		
3.10	Phenol				Concentration	ug/L	<25.0	NA	NA	1		
3.10	(108-95-2)			V N	Mass	ppd	0	NA	NA	1		
3.11	2,4,6-trichlorophenol			V	Concentration	ug/L	<25.0	NA	NA	1		
	(88-05-2)				Mass	ppd	0	NA	NA	1		
Section	on 4. Organic Toxic Pollutants	(GC/MS Fract	ion—Base /	Neutral Com		<u> </u>					T	
4.1	Acenaphthene			V	Concentration	ug/L	<10.0	NA	NA	1		
7.1	(83-32-9)				Mass	ppd	0	NA	NA	1		
4.2	Acenaphthylene				Concentration	ug/L	<10.0	NA	NA	1	300-20-	
7.2	(208-96-8)				Mass	ppd	0	NA	NA	1		
4.3	Anthracene			<b>V</b>	Concentration	ug/L	<10.0	NA	NA	1		
7.0	(120-12-7)				Mass	ppd	0	NA	NA	1		
4.4	Benzidine			<b>V</b>	Concentration	ug/L	<100	NA	NA	1		
7.7	(92-87-5)				Mass	ppd	0	NA	NA	1		
4.5	Benzo (a) anthracene				Concentration	ug/L	<10.0	NA	NA	1		
7.0	(56-55-3)				Mass	ppd	0	NA	NA	1		
4.6	Benzo (a) pyrene			<b>V</b>	Concentration	ug/L	<10.0	NA	NA	1		
7.0	(50-32-8)				Mass	ppd	0	NA	NA	1		

Facility Name Robbins, LLC

DSN0011

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	ALD004002033	AL0069931			.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			DSNOOTI				
TABL	E B. TOXIC METALS, CYANIDE	TOTAL PHE		ORGANIC T	OXIC POLLUTAN	TS (40 CF	R 122.21(g)(7)	(v)) <sup>1</sup>		MIN SHE		
			(check one)					Intake (optional)				
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
4.7	3,4-benzofluoranthene (205-99-2)	Ø		Ø	Concentration	ug/L	<10.0	NA	NA	1		
4,7					Mass	ppd	0	NA	NA	1		
4.8	Benzo (ghi) perylene (191-24-2)	V		Ø	Concentration	ug/L	<10.0	NA	NA	1		
4.8					Mass	ppd	0	NA	NA	1		
4.9	Benzo (k) fluoranthene (207-08-9)	V		Ø	Concentration	ug/L	<10.0	NA	NA	1		
4.9					Mass	ppd	0	NA	NA	1		
4.10	Bis (2-chloroethoxy) methane (111-91-1)	<b>V</b>		V	Concentration	ug/L	<25.0	NA	NA	1		
4.10					Mass	ppd	0	NA	NA	1		
4.11	Bis (2-chloroethyl) ether (111-44-4)	<b>V</b>		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.11					Mass	ppd	0	NA	NA	1		
4.40	Bis (2-chloroisopropyl) ether (102-80-1)	<b>V</b>		V	Concentration	ug/L	<25.0	NA	NA	1		
4.12					Mass	ppd	0	NA	NA	1		
4 40	Bis (2-ethylhexyl) phthalate (117-81-7)	<b>V</b>		✓	Concentration	ug/L	<50.0	NA	NA	1		
4.13					Mass	ppd	0	NA	NA	1		
444	4-bromophenyl phenyl ether (101-55-3)	<b>V</b>		<b>V</b>	Concentration	ug/L	<25.0	NA	NA	1		
4.14					Mass	ppd	0	NA	NA	1		
4.45	Butyl benzyl phthalate (85-68-7)	V		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.15					Mass	ppd	0	NA	NA	1		
A 40	2-chloronaphthalene	Ø		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.16	(91-58-7)				Mass	ppd	0	NA	NA	1		
4,17	4-chlorophenyl phenyl ether	Ø		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.17	(7005-72-3)				Mass	ppd	0	NA	NA	1		
4.18	Chrysene	Ø		Ø	Concentration	ug/L	<10.0	NA	NA	1		
4.18	(218-01-9)				Mass	ppd	0	NA	NA	1		
4.19	Dibenzo (a,h) anthracene (53-70-3)			Ø	Concentration	ug/L	<10.0	NA	NA	1		
4.19					Mass	ppd	0	NA	NA	1		

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NPDES Permit Number AL0069931 Facility Name Robbins, LLC Outfall Number DSN0011

ALD004002033			69931				DSN0011					
TABLI	E B. TOXIC METALS, CYANIDE,	TOTAL PHE	Presence	or Absence	OXIC POLLUTAN	TS (40 CF	R 122.21(g)(7)				Int	fake
		Testing Required	(check one)				Effluent				Intake (optional)	
	Pollutant/Parameter (and CAS Number, if available)		Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
4.20	1,2-dichlorobenzene (95-50-1)	V		V	Concentration	ug/L	<25.0	NA	NA	1		
4.20					Mass	ppd	0	NA	NA	1		
4.21	1,3-dichlorobenzene (541-73-1)	V		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.21					Mass	ppd	0	NA	NA	1		
4.22	1,4-dichlorobenzene (106-46-7)	✓		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.22					Mass	ppd	0	NA	NA	1		
4.23	3,3-dichlorobenzidine (91-94-1)	<b>V</b>		✓	Concentration	ug/L	<25.0	NA	NA	1		
4.23					Mass	ppd	0	NA	NA	1		
4.24	Diethyl phthalate	<b></b>			Concentration	ug/L	<25.0	NA	NA	1		
	(84-66-2)				Mass	ppd	0	NA	NA	1		
4.25	Dimethyl phthalate (131-11-3)	Ø		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.25					Mass	ppd	0	· NA	NA	1		
4.26	Di-n-butyl phthalate (84-74-2)			Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.20					Mass	ppd	0	NA	NA	1		
4.27	2,4-dinitrotoluene (121-14-2)			Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.21		V			Mass	ppd	0	NA	NA	1		
4.28	2,6-dinitrotoluene (606-20-2)			<b>4</b>	Concentration	ug/L	<25.0	NA	NA	1		
4.20		V			Mass	ppd	0	NA	NA	1		
4.29	Di-n-octyl phthalate			✓	Concentration	ug/L	<25.0	NA	NA	1		
4.29	(117-84-0)	V			Mass	ppd	0	NA	NA	1		
4.30	1,2-Diphenylhydrazine			✓	Concentration	ug/L	<25.0	NA	NA	1		
4.30	(as azobenzene) (122-66-7)	[4]			Mass	ppd	0	NA	NA	1		
4.31	Fluoranthene	V		V	Concentration	ug/L	<10.0	NA	NA	1		
4.31	(206-44-0)	V.			Mass	ppd	0	NA	NA	1		
4.32	Fluorene (86-73-7)	✓		Ø	Concentration	ug/L	<10.0	NA	NA	1		
					Mass	ppd	0	NA	NA	1		

**EPA Identification Number** 

ALD004002655

-	EPA Identification Number ALD004002655		ermit Number 69931		Facility Name Robbins, LLC			utfall Number DSN0011				ved 03/05/19 o. 2040-0004
TABLI	E B. TOXIC METALS, CYANIDE	, TOTAL PHE	Presence	ORGANIC T or Absence ck one)	OXIC POLLUTAN	TS (40 CF	R 122.21(g)(7)		uent			take tional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
4.33	Hexachlorobenzene			Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.33	(118-74-1)				Mass	ppd	0	NA	NA	1		
4.34	Hexachlorobutadiene			<b>V</b>	Concentration	ug/L	<25.0	NA	NA	1		
4.54	(87-68-3)				Mass	ppd	0	NA	NA	1		
4.25	Hexachlorocyclopentadiene			V	Concentration	ug/L	<25.0	NA	NA	1		
4.35	(77-47-4)	(V)		V	Mass	ppd	0	NA	NA	1		
4.00	Hexachloroethane			V	Concentration	ug/L	<25.0	NA	NA	1		
4.36	(67-72-1)	V	ш	[4]	Mass	ppd	0	NA	NA	1		
4.37	Indeno (1,2,3-cd) pyrene	Ø		V	Concentration	ug/L	<10.0	NA	NA	1		
4.37	(193-39-5)			\\	Mass	ppd	0	NA	NA	1		
4.00	Isophorone	Ø		V	Concentration	ug/L	<25.0	NA	NA	1		
4.38	(78-59-1)			[4]	Mass	ppd	0	NA	NA	1		
4.00	Naphthalene			V	Concentration	ug/L	<10.0	NA	NA	1		
4.39	(91-20-3)				Mass	ppd	0	NA	NA	1		
4.40	Nitrobenzene	V		V	Concentration	ug/L	<25.0	NA	NA	1		
4.40	(98-95-3)	<u>~</u>			Mass	ppd	0	NA	NA	1		
	N-nitrosodimethylamine	Ø		Ø	Concentration	ug/L	<25.0	NA	NA	1		
4.41	(62-75-9)				Mass	ppd	0	NA	NA	1		
4.40	N-nitrosodi-n-propylamine			V	Concentration	ug/L	<25.0	NA	NA	1		-
4.42	(621-64-7)				Mass	ppd	0	NA	NA	1		
1.40	N-nitrosodiphenylamine			V	Concentration	ug/L	<50.0	NA	NA	1		
4.43	(86-30-6)				Mass	ppd	0	NA	NA	1		
	Phenanthrene			Ø	Concentration	ug/L	<10.0	NA	NA	1		
4.44	(85-01-8)				Mass	ppd	0	NA	NA	1		
4.45	Pyrene			[7]	Concentration	ug/L	<10.0	NA	NA	1		
4.45	(129-00-0)	V		✓	Mass	ppd	0	NA	NA	1		

EPA Identification Number NPDES Permit Number Facility Name Outfall Number Form Approved 03/05/19
ALD004002655 AL0069931 Robbins, LLC DSN0011 Form Approved 03/05/19

ALD004002655		AL0069931			Robbins, LLC				OMB No. 2040-0004			
TABLE	E B. TOXIC METALS, CYANIDE,	TOTAL PHE		ORGANIC T	OXIC POLLUTANT	rs (40 CF	R 122.21(g)(7)				1-1-1	also.
			(che	ck one)				Effli	uent			take tional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
4.46	1,2,4-trichlorobenzene	V		V	Concentration	ug/L	<25.0	NA	NA	1		
Castio	(120-82-1) on 5. Organic Toxic Pollutants (			idae)	Mass	ppd	0	NA	NA	1		
Secuo			ion—resuc		Concentration		T			T	T	
5.1	Aldrin (309-00-2)			Ø	Mass							
5.2	α-BHC (319-84-6)			V	Concentration Mass							
5.3	β-BHC (319-85-7)			Ø	Concentration Mass							
5.4	γ-BHC (58-89-9)			V	Concentration Mass							
5.5	δ-BHC (319-86-8)			V	Concentration Mass							
5.6	Chlordane (57-74-9)			V	Concentration Mass							
5.7	4,4'-DDT (50-29-3)			Ø	Concentration Mass							
5.8	4,4'-DDE (72-55-9)			Ø	Concentration Mass							
5.9	4,4'-DDD (72-54-8)			Ø	Concentration Mass							
5.10	Dieldrin (60-57-1)			Ø	Concentration Mass							
5.11	α-endosulfan (115-29-7)			Ø	Concentration Mass							

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EPA Identification Number NPDES Permit Number Facility Name Outfall Number ALD004002655 AL0069931 Robbins, LLC DSN0011

	ALD004002655	AL00	69931		NODDIIIS, LLC		DSN0011			ONDIV	0. 2040-0004
TABL	E B. TOXIC METALS, CYANIDE,	Presence or Abset (check one)		or Absence	OXIC POLLUTANTS (40	CFR 122.21(g)(7)	-			Int	take
			(che	ck one)			Effl	uent			tional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)	Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses
5.12	β-endosulfan (115-29-7)			✓	Concentration Mass						
	<u> </u>				Concentration						
5.13	Endosulfan sulfate (1031-07-8)			✓	Mass						
					Concentration						
5.14	Endrin (72-20-8)			✓	Mass						
	Endrin aldehyde				Concentration						
5.15	(7421-93-4)			V	Mass						
5.16	Heptachlor			Ø	Concentration						
5.10	(76-44-8)			V	Mass						
5.17	Heptachlor epoxide			V	Concentration						
0.17	(1024-57-3)				Mass						
5.18	PCB-1242 (53469-21-9)			✓	Concentration						
	PCB-1254				Mass						
5.19	(11097-69-1)			✓	Concentration						
	PCB-1221	-			Mass Concentration						
5.20	(11104-28-2)			✓	Mass						
	PCB-1232				Concentration						
5.21	(11141-16-5)			Ø	Mass						
F 00	PCB-1248				Concentration						
5.22	(12672-29-6)			✓	Mass						
5.23	PCB-1260			V	Concentration						
0.20	(11096-82-5)				Mass						
5.24	PCB-1016 (12674-11-2)			✓	Concentration						
	(120/4-11-2)				Mass						

	EPA Identification Number ALD004002655	NPDES Permit Number AL0069931		Facility Name Robbins, LLC		Outfall Number DSN0011				Form Approved 03/05/19 OMB No. 2040-0004		
TABL	E B. TOXIC METALS, CYANIDE	, TOTAL PHE	Presence or Absence (check one)		OXIC POLLUTANTS (40	) CFR 122.21(g)(7)	CFR 122.21(g)(7)(v))1  Effluent				Intake (optional)	
	Pollutant/Parameter (and CAS Number, if available)	Trodamod	Believed Absent	Units (specify)	Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long- Term Average Value	Number of Analyses		
5.25	Toxaphene (8001-35-2)			Ø	Concentration Mass							

<sup>&</sup>lt;sup>1</sup> 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 ALD004002655 NPDES Permit Number AL0069931 Facility Name Robbins, LLC

Outfall Number DSN001 Form Approved 03/05/19 OMB No. 2040-0004

TAB	LE C. CERTAIN CO	VENTIONAL	AND NON CO	NVENTIONAL PO	LLUTANT	S (40 CFR 122.21(g)	(7)(vi)) <sup>1</sup>				45
		Presence of (check					Efflo	uent		Inta (Option	
	Pollutant	Believed Present	Believed Absent	sent		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
	Check here if you be each pollutant.										
	Check here if you be each pollutant.	elieve all pollut	ants on Table	C to be <b>absent</b> in y	our dischai	rge from the noted ou	ıtfall. You need ı	not complete the "Pr	esence or Abser	nce" column of T	able C for
	Bromide			Concentration	mg/L	<0.100	NA	NA	1		
1.	(24959-67-9)		V	Mass	ppd	0	NA	NA	1		
_	Chlorine, total			Concentration	mg/L	<0.05	<0.05	<0.05	12		
2.	residual		✓	Mass	ppd	0	0	0	12		
0	Orles			Concentration	Pt-Co	5	NA	NA	1		
3.	Color	<b>7</b>		Mass	NA	NA	NA	NA	1		
	F1			Concentration	MPN	17,300	17,300	10,475	2		
4.	Fecal coliform	<b></b>		Mass	NA	NA	NA	NA	2		
E	Fluoride	Ø		Concentration	mg/L	0.159	NA	NA	1		
5.	(16984-48-8)	V.		Mass	ppd	0.557	NA	NA	1		
6	Nitrata nitrita	Ø		Concentration	mg/L	2.32	NA	NA	1		
0	Nitrate-nitrite	[V]		Mass	ppd	8.121	NA	NA	1		
7.	Nitrogen, total			Concentration	mg/L	<0.500	NA	NA	1		
1.	organic (as N)		V	Mass	ppd	0	NA	NA	1		
0	Oil and areas		V	Concentration	mg/L	<1.8	<1.8	<1.8	12		
8.	Oil and grease		V	Mass	ppd	0	0	0	12		
9.	Phosphorus (as		V	Concentration	mg/L	<0.500	NA	NA	1		
9.	P), total (7723-14-0)			Mass	ppd	0	NA	NA	1		
10.	Sulfate (as SO <sub>4</sub> )	V		Concentration	mg/L	5.70	NA	NA	1		
10.	(14808-79-8)	Į.		Mass	ppd	19.952	NA	NA	1		
11.	Sulfide (as S)			Concentration	mg/L	<0.5	NA	NA	1		
111.	Sullide (as S)			Mass	ppd	0	NA	NA	1		

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		Presence o					Effic	uent		Inta (Optio							
	Pollutant	Believed Believed Absent		Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses						
12.	Sulfite (as SO <sub>3</sub> )			Concentration	mg/L	0.64	NA	NA	1								
۷.	(14265-45-3)	ĽJ		Mass	ppd	2.24	NA	NA	1								
13.	Surfactants		V	Concentration	mg/L	<0.200	NA	NA	1								
13.	Surfaciants			Mass	ppd	0	NA	NA	1								
4.4	Aluminum, total	V		Concentration	mg/L	<0.100	NA	NA	1								
14.	(7429-90-5)	V		Mass	ppd	0	NA	NA	1								
45	Barium, total	m, total		Concentration	mg/L	0.0445	NA	NA	1								
15.	(7440-39-3)	V		Mass	ppd	0.1558	NA	NA	1								
16.	Boron, total		V	Concentration	mg/L	<0.0500	NA	NA	1								
16.	(7440-42-8)		Mass	ppd	0	NA	NA	1									
47	Cobalt, total	Cobalt total		Concentration	mg/L	<0.0100	NA	NA	1								
17.	(7440-48-4)			Mass	ppd	0	NA	NA	1								
40	Iron, total				П	п	П		V	Concentration	mg/L	<0.100	NA	NA	1		
18.	(7439-89-6)	ш		Mass	ppd	0	NA	NA	1								
40	Magnesium, total			Concentration	mg/L	3.55	NA	NA	1								
19.	(7439-95-4)	✓		Mas:s	ppd	12.43	NA	NA	1								
	Molybdenum,		-	Concentration	mg/L	<0.0050	NA	NA	1								
20.	total (7439-98-7)			Mas:s	ppd	0	NA	NA	1								
	Manganese, total			Concentration	mg/L	<0.0100	NA	NA	1								
21.	(7439-96-5)		✓	Mas s	ppd	0	NA	NA	1								
	Tin, total		[7]	Concentration	mg/L	<0.0500	NA	NA	1								
22.	(7440-31-5)			Mas s	ppd	0	NA	NA	1								
	Titanium, total			Concentration	mg/L	<0.0100	NA	NA.	1								
23.	(7440-32-6)		Ø	Mass	ppd	0	NA	NA	1								

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number	Form Approved 03/05/19
ALD004002655	AL0069931	Robbins, LLC	DSN001	OMB No. 2040-0004

		Presence o				Efflo	uent		Intake (Optional)	
	Pollutant	Believed Present	Believed Absent	Units (specify)	Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
24.	Radioactivity									
	Alaba datal		Ø	Concentration				0		
	Alpha, total		Ш	Mass				0		
				Concentration				0		
	Beta, total		V	Mass				0		
			F7	Concentration				0		
	Radium, total			Maiss				0		
			[7]	Concentration				0		
	Radium 226, total	Maiss				0	33.00			

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

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EPA Identification Number NPDES Permit Number Facility Name Outfall Number Form Approved 03/05/19
ALD004002655 AL0069931 Robbins, LLC DSN001 OMB No. 2040-0004

IAB	LE D. CERTAIN HAZARDOUS SUBS	Presence o		((g)(r)(vii)),	
	Pollutant	(check	one)	Reason Pollutant Believed Present in Discharge	Available Quantitative Data
		Believed Present	Believed Absent	Nousen Folkam Deletter (1830m in District Section 2018)	(specify units)
1.	Asbestos				
2.	Acetaldehyde		Ø		
3.	Allyl alcohol		Ø		
4.	Allyl chloride		Ø		
5.	Amyl acetate		Ø		
6.	Aniline		Ø		
7.	Benzonitrile		V		
8.	Benzyl chloride		Ø		
9.	Butyl acetate		Ø		
10.	Butylamine		Ø		
11.	Captan		V		
12.	Carbaryl		Ø		
13.	Carbofuran		Ø		
14.	Carbon disulfide		V		
15.	Chlorpyrifos		Ø		
16.	Coumaphos				
17.	Cresol		V		
18.	Crotonaldehyde		V		
19.	Cyclohexane		V		

EPA Identification Number NPDES Permit Number Facility Name Outfall Number Form Approved 03/05/19
ALD004002655 AL0069931 Robbins, LLC DSN001 OMB No. 2040-0004

TAB	TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))1											
		Presence o			Available Quantitative Data							
	Pollutant	Believed Present	Believed Absent	Reason Pollutant Believed Present in Discharge	(specify units)							
20.	2,4-D (2,4-dichlorophenoxyacetic acid)		<b>V</b>									
21.	Diazinon											
22.	Dicamba		V									
23.	Dichlobenil		<b>V</b>									
24.	Dichlone		<b>V</b>									
25.	2,2-dichloropropionic acid		V									
26.	Dichlorvos		V									
27.	Diethyl amine		V									
28.	Dimethyl amine											
29.	Dintrobenzene		Ø									
30.	Diquat		Ø									
31.	Disulfoton											
32.	Diuron		V									
33.	Epichlorohydrin		<b>V</b>									
34.	Ethion		<b>V</b>									
35.	Ethylene diamine	. 🗆	Ø									
36.	Ethylene dibromide		V									
37.	Formaldehyde		<b>V</b>									
38.	Furfural		V									

EPA Identification Number ALD004002655 NPDES Permit Number AL0069931 Facility Name Robbins, LLC Outfall Number DSN001 Form Approved 03/05/19 OMB No. 2040-0004

TAB	ABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii)) <sup>1</sup>											
		Presence of (check			Available Quantitative Data							
	Pollutant	Believed Present	Believed Absent	Reason Pollutant Believed Present in Discharge	(specify units)							
39.	Guthion		Ø									
40.	Isoprene		V									
41.	Isopropanolamine		Ø									
42.	Kelthane		Ø									
43.	Kepone		Ø									
44.	Malathion		Ø									
45.	Mercaptodimethur		Ø									
46.	Methoxychlor		Ø									
47.	Methyl mercaptan		Ø									
48.	Methyl methacrylate		Ø									
49.	Methyl parathion		Ø									
50.	Mevinphos		Ø									
51.	Mexacarbate		✓									
52.	Monoethyl amine		✓									
53.	Monomethyl amine		✓									
54.	Naled		Ø									
55.	Naphthenic acid		Ø									
56.	Nitrotoluene		Ø									
57.	Parathion		Ø									

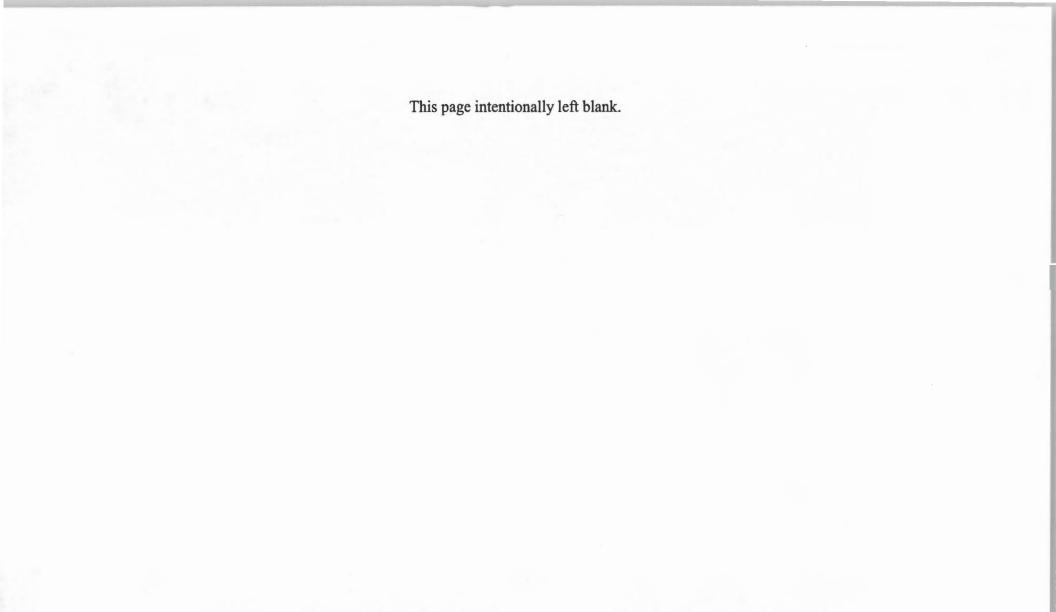
EPA Identification Number NPDES Permit Number Facility Name Outfall Number Form Approved 03/05/19
ALD004002655 AL0069931 Robbins, LLC DSN001 OMB No. 2040-0004

TAB	TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))1											
		Presence o			Available Quantitative Data							
	Pollutant	Believed Present	Believed Absent	Reason Pollutant Believed Present in Discharge	(specify units)							
58.	Phenoisulfonate		Ø									
59.	Phosgene		V									
60.	Propargite		Ø									
61.	Propylene oxide		V									
62.	Pyrethrins		V									
63.	Quinoline		Ø									
64.	Resorcinol		Ø									
65.	Strontium		Ø									
66.	Strychnine		Ø									
67.	Styrene		Ø									
68.	2,4,5-T (2,4,5-trichlorophenoxyacetic acid)		Ø									
69.	TDE (tetrachlorodiphenyl ethane)		✓									
70.	2,4,5-TP [2-(2,4,5-trichlorophenoxy) propanoic acid]		Ø									
71.	Trichlorofon											
72.	Triethanolamine											
73.	Triethylamine		Ø									
74.	Trimethylamine		Ø									
75.	Uranium		<b>V</b>									
76.	Vanadium		Ø									

	EPA Identification Number ALD004002655	NPDES Permit Number AL0069931		acility Name obbins, LLC	Outfall Number DSN001	Form Approved 03/05/19 OMB No. 2040-0004	
TAB	LE D. CERTAIN HAZARDOUS SU	BSTANCES AND ASBEST	OS (40 CFR 122.2	1(g)(7)(vii)) <sup>1</sup>			
	Dellutant	Presence or Absenc				Available Quantitative Data	
	Pollutant	Believed Present	Believed Absent	Reason Poiluta	ant Believed Present in Discharge	(specify units)	
77.	Vinyl acetate		Ø				
78.	Xylene		Ø				
79.	Xylenol		Ø				
80.	Zirconium		Ø				

EPA Form 3510-2C (Revised 3-19)

<sup>1</sup> 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 ALD004002655	1, 2007, 0	NPDES Permit Number AL0069931		Facility Name Robbins, LLC	Form Approved 03/05/19 OMB No. 2040-0004	
TABLE E. 2,3,7,8 TETRACHLOR	RODIBENZO P DIOX			R 122.21(g)(7)(viii))		
Pollutant	TCDD Congeners Used or Manufactured	Preser Abse (check Believed Present	ence		Results of Screening Procedur	re
2,3,7,8-TCDD						

EPA Form 3510-2C (Revised 3-19)



10/26/2023

Southern Environmental Engineering Mr. Eric Curtis 1222 Helton Drive Florence, AL, 35630

Ref:

**Analytical Testing** 

Lab Report Number: 23-292-0096 Client Project Description: Robbins, LLC

Muscle Shoals, AL

Dear Mr. Eric Curtis:

Waypoint Analytical, LLC. received sample(s) on 10/19/2023 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 asreceived 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,

Andrea R Brownfield Project manager

ardrew Broughld

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.





# **Certification Summary**

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

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2024
Florida	State Program - NELAP	E871157	06/30/2024
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2024
Illinois	State Program - NELAP	200078	10/31/2024
Kentucky	State Program	80215	06/30/2024
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2024
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2024
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2024
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2024
Virginia	State Program	00106	06/30/2024
Virginia	State Program - NELAP	460181	09/14/2024



#### **Sample Summary Table**

Report Number:

23-292-0096

**Client Project Description:** 

Robbins, LLC

Muscle Shoals, AL

Lab No	Client Sample ID	Matrix	Date Collected	Date Received
90224	DSN0011 - Composite	Aqueous	10/18/2023 09:40	10/19/2023



## **Summary of Detected Analytes**

Project:

Robbins, LLC

**Report Number:** 

23-292-0096

Client Sample ID	Lab Sample ID					
Method	Parameters	Result	Units	Report Limit	Analyzed	Qualifiers
DSN0011 -	L 90224					
Composite						
2540D-2015	Total Suspended Solids	5	mg/L	2	10/20/2023 13:31	



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence , AL 35630 Project

Robbins, LLC

REPORT OF ANALYSIS

Information: Muscle Shoals, AL

Report Date: 10/26/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

Projec

Lab No: 90

90224

Report Number: 23-292-0096

Sample ID: DSN0011 - Composite

Matrix: Aqueous

Sampled: 10/18/2023 9:40

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Ammonia Nitrogen	<0.100	mg/L	0.100	1	10/26/23 11:16	JFM	4500NH3D-2011
Biochemical Oxygen Demand (5-day)	<5	mg/L	5	1	10/19/23 10:15	RDP	5210B-2016
COD (Chemical Oxygen Demand)	<15.0	mg/L	15.0	1	10/20/23 14:03	CJR	5220D-2011
Total Suspended Solids	5	mg/L	2	1	10/20/23 13:31	MJT	2540D-2015
тос	<1.00	mg/L	1.00	1	10/25/23 16:30	ELM	5310C-2014

DF



## **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0096

QC Analytical Batch:

L712235

**Analysis Method:** 

2540D-2015

**Analysis Description:** 

**Total Suspended Solids** 

Units

Lab Reagent Blank

LRB

Blank

Result

Matrix: AQU

Lab Reagent Dlank

Associated Lab Samples: 90224

MQL

Analyzed

Total Suspended Solids

**Parameter** 

mg/L < 2

2

10/20/23 13:31

**Laboratory Control Sample** 

LCS

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Total Suspended Solids	mg/L	100	98	98.0	90-110	

**Duplicate** 

L 90239-DUP

Parameter	Units	Result	DUP Result	RPD	Max RPD	Analyzed	
Total Suspended Solids	mg/L	< 2	< 2	0.0	10	10/20/23 13:31	

Date: 10/26/2023 04:54 PM

Page 6 of 12



## **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0096

QC Analytical Batch:

L713374

**Analysis Method:** 

4500NH3D-2011

**Analysis Description:** 

Ammonia Nitrogen (ISE)

Lab Reagent Blank

LRB

Matrix: AQU

Associated Lab Samples: 90224

**Parameter** 

Blank Units Result MQL

Analyzed

Ammonia Nitrogen

< 0.100 mg/L

0.100

10/26/23 11:16

**Laboratory Control Sample** 

LCS

**Parameter** 

Spike Conc.

LCS Result LCS %Rec

MSD

Result

2.00

102

% Rec

Limits

Ammonia Nitrogen

mg/L 5.00

Units

Units

mg/L

5.08

90-110

Matrix Spike & Matrix Spike Duplicate

L 90383-MS

L 90383-MSD

**Parameter** Ammonia Nitrogen

< 0.102

Result

2.04

**MS Spike** 

Conc.

Conc. 2.04

MSD

Spike

1,91

**MS Result** 

94.0

MS

%Rec

98.0

MSD

%Rec

70-130

Limits RPD

%Rec

20.0 4.6

Max

**RPD** 

Date: 10/26/2023 04:54 PM

Page 7 of 12

Page 2 of 5



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0096

QC Analytical Batch:

L712182

**Analysis Method:** 

5210B-2016

**Analysis Description:** 

Biochemical Oxygen Demand (BOD)

**Glucose-Glutamic Acid** 

GGA

Parameter

Result

Range

**Analyzed** 

Biochemical Oxygen Demand (5-day)

mg/L 168

Units

167.5-228.5

10/19/23 10:15

**Duplicate** 

L 90187-DUP

Parameter	Units	Result	DUP Result	RPD	Max RPD	Analyzed	
Biochemical Oxygen Demand (5-day)	mg/L	2050	1860	9.7	30	10/19/23 10:15	

Date: 10/26/2023 04:54 PM

Page 8 of 12



## **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0096

QC Analytical Batch:

L712294

**Analysis Method:** 

5220D-2011

**Analysis Description:** 

Chemical Oxygen Demand (COD)

Lab Reagent Blank 2

LRB2

Matrix: AQU

Associated Lab Samples: 90224

**Blank** MQL **Analyzed** Units **Parameter** Result 15.0 10/20/23 14:03 COD (Chemical Oxygen Demand) < 15.0 mg/L

**Laboratory Control Sample** 

LCS

Spike LCS LCS %Rec % Rec **Parameter** Units Limits Conc. Result 74.0 99.0 95-105 COD (Chemical Oxygen Demand) mg/L 75.0

**Duplicate** 

L 90288-DUP

Parameter	Units		Result			
COD (Chemical Oxygen Demand)	mg/L	< 15.0	< 15.0	0.0	10.0	10/20/23 14:03

**Matrix Spike** 

L 90288-MS

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	%Rec Limits	Max RPD
COD (Chemical Oxygen Demand)	mg/L	< 15.7	78.9		79.3		101	70-130	

Date: 10/26/2023 04:54 PM

Page 9 of 12



## **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0096

QC Prep:

L713446

QC Analytical Batch(es): L713448

QC Prep Batch Method: 5310C-2011

**Analysis Method:** 

5310C-2014

**Analysis Description:** 

Total Organic Carbon

Lab Reagent Blank

LRB-L713446

Matrix: AQU

Associated Lab Samples: 90224

**Laboratory Control Sample** 

MQL

**Parameter** 

TOC

Blank Result

< 1.00

1.00

**Analyzed** 10/25/23 10:48

LCS-L713446

**Parameter** 

Units

Units

Units

mg/L

Units

mg/L

Spike Conc.

LCS Result LCS %Rec

% Rec Limits

TOC

1.00 mg/L

1.44

144

50-150

**Duplicate** 

L 90422-DUP-L713446

DUP

Result

1.52

TOC

**Parameter** 

Result 1.50

**RPD** 

1.3

MSD

Spike

Conc.

Max RPD

15.0

**Analyzed** 

10/25/23 13:58

**Matrix Spike** 

L 90423-MS-L713446

**Parameter** 

Result

MSD Result

MS %Rec %Rec Limits Max RPD

TOC

1.36 mg/L

5.26

**MS Spike** 

Conc.

7.34

**MS Result** 

114

85-115

Date: 10/26/2023 04:54 PM

Page 10 of 12



## **Shipment Receipt Form**

Customer Number	: 23184				
Customer Name:	Southern Environm	ental Engi	neering		
Report Number:	23-292-0096				
		Shipping	Method		
○ Fed Ex	○ US Postal	○ Lab		Other:	
UPS	Client	Courie	r	Thermometer ID:	T135
Shipping container/	cooler uncompromise	d?	Yes	○ No	
Number of coolers/	boxes received		1		
Custody seals intac	t on shipping containe	er/cooler?	Yes	○ No	O Not Present
Custody seals intac	et on sample bottles?		○ Yes	○ No	<ul><li>Not Present</li></ul>
Chain of Custody (	COC) present?		Yes	○ No	
COC agrees with s	ample label(s)?		Yes	○ No	
COC properly comp	pleted		Yes	○ No	
Samples in proper	containers?		Yes	○ No	
Sample containers	intact?		Yes	○ No	
Sufficient sample v	olume for indicated tes	st(s)?	Yes	○ No	
All samples receive	ed within holding time?		Yes	○ No	
Cooler temperature	in compliance?		Yes	○ No	
	rived at the laboratory sidered acceptable as .		Yes	○ No	
Water - Sample co	ntainers properly prese	erved	Yes	○ No	○ N/A
Water - VOA vials f	ree of headspace		○ Yes	○ No	● N/A
Trip Blanks receive	d with VOAs		O Yes	○ No	● N/A
Soil VOA method 5	035 – compliance crite	eria met	O Yes	○ No	● N/A
High concentrat	tion container (48 hr)		Lov	v concentration EnC	Core samplers (48 hr)
High concentrat	ion pre-weighed (meth	nanol -14 d)	Lov	v conc pre-weighed	vials (Sod Bis -14 d)
Special precautions	s or instructions includ	ed?	○ Yes	No	
Comments:					

Signature: Carleen Qualls Date & Time: 10/19/2023 12:55:56

Client Name/Address SEE PO Box 3241 Florence, AL 35630  Client Project Manager/Cont Eric Curtis (256) 443-8306 ecurtis@see-env.com				act		Sar	g Informa	ition			For Laboratory Use Only					
Robbins LLC Permit Renewal 2C Table A  Project Number  Project Mar			Project/Site Location (City/State)  Muscle Shoals, AL				RUSH – Additional charges apply Special Detection Limit(s) Date Results Needed				Method of Shi Fed Ex Courier Other	UPS USPS Client Drop Off		WW - Wastewater GW - Groundwater DW - Drinking Water S - Soil / Solid O - Oil		
			(256) 443-83	Project Manager Phone # (256) 443-8306			Project Manager Email ecurtis@see-env.com				Purchase Orde	er Number	Site/Facility ID #	Site/Facility ID #		
2790 V Mempl	Vhitten Rhis, TN 38	oad	Unless noted, all containers per Table II of 40 CFR Part 136.	Number of Containers	Matrix (Refer to Key)	(G)rab or (C)omposite	BOD, TSS	COD, NH3-N	TOC				A Cool < 10C Na B Cool < 10C Na B Cool < 10C C H2SO4 pN<2 D None Require E NaOH pN>10 F HNO3 pN<2 G HCL pN<2 H H3PO4 pN<2 I Cool < 6C NA			
Date	Time		Sample Identification		Ξ		Required Ana		d Analy	nalysis / Preservative		Commer	nts/Notes			
10/18/23	09:40	DSN0011		1	ww	С	1									
10/18/23	09:40	DSN0011		1	ww	С		1								
10/18/23	09:40	DSN0011	SN0011		ww	С			1							
			Custody Seals													
			Cooler's)/Container(s)						So	outhern obbins, I	Environmental LC	Engineering	23-292-0096 23184 10-19-2023 12:55:33			
								22272-222444444								
Ice	1 0	For Laboratory Use Only ustody Lab Comments			Sampled by (Name – Print)					Client Remarks/Comments						
ON		y N		_	Relinquished by: (SIGNATURE)					Temp: Date Time Date Time	Received by: (SIG		Date Time			
0.8°	c 5 v	ne				ed by: (SIGNATURE)				1	Date Time	Beceived by: 1510	NATURE) Cul	Date Time 11:20		

19/19/23 Me



10/30/2023

Southern Environmental Engineering Mr. Eric Curtis 1222 Helton Drive Florence, AL, 35630

Ref:

**Analytical Testing** 

Lab Report Number: 23-292-0097 Client Project Description: Robbins, LLC

Permit Renewal 2C Table B

Dear Mr. Eric Curtis:

Waypoint Analytical, LLC. received sample(s) on 10/19/2023 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 asreceived 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,

Andrea R Brownfield Project manager

Indrew Broughld

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.





# **Certification Summary**

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

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2024
Florida	State Program - NELAP	E871157	06/30/2024
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2024
Illinois	State Program - NELAP	200078	10/31/2024
Kentucky	State Program	80215	06/30/2024
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2024
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2024
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2024
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2024
Virginia	State Program	00106	06/30/2024
Virginia	State Program - NELAP	460181	09/14/2024



## **Sample Summary Table**

Report Number:

23-292-0097

**Client Project Description:** 

Robbins, LLC Permit Renewal 2C Table B

Lab No	Client Sample ID	Matrix	Date Collected	Date Received	
90231	DSN0011 (Composite)	Aqueous	10/18/2023 09:40	10/19/2023	
90232	DSN0011 (Grab)	Aqueous	10/18/2023 10:00	10/19/2023	



Client: Southern Environmental Engineering

Project: Robbins, LLC

Lab Report Number: 23-292-0097

Date: 10/30/2023

**CASE NARRATIVE** 

#### Volatile Organic Compounds - GC/MS Method 624.1

Analyte: 2-Chloroethyl vinyl ether QC Batch No: L712459/L712432

Analyte was flagged for 0% recovery in the LCS and/or LCSD due to the result being below the MQL. The actual result was 1.649 which calculates to a recovery of 8.24% which is within the acceptable recovery range.

#### Semivolatile Organic Compounds - GC/MS Method 625.1

Sample 90231 (DSN0011 (Composite))

QC Batch No: L713244/L713147

The sample was diluted due to the nature of the sample matrix. Reporting limits have been adjusted accordingly.



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table B

REPORT OF ANALYSIS

Report Date: 10/30/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

Δ.

Lab No: 90231

Sample ID : DSN0011 (Composite)

Report Number: 23-292-0097

Matrix: Aqueous

Sampled: 10/18/2023 9:40

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Aluminum	<0.100	mg/L	0.100	1	10/20/23 18:35	BKN	EPA-200.7
Barium	0.0445	mg/L	0.0100	1	10/20/23 18:35	BKN	EPA-200.7
Boron	<0.0500	mg/L	0.0500	1	10/20/23 18:35	BKN	EPA-200.7
Cobalt	<0.0100	mg/L	0.0100	1	10/20/23 18:35	BKN	EPA-200.7
Iron	<0.100	mg/L	0.100	1	10/20/23 18:35	BKN	EPA-200.7
Magnesium	3.55	mg/L	0.100	1	10/20/23 18:35	BKN	EPA-200.7
Molybdenum	<0.0050	mg/L	0.0050	1	10/20/23 18:35	BKN	EPA-200.7
Manganese	<0.0100	mg/L	0.0100	1	10/20/23 18:35	BKN	EPA-200.7
Tin	<0.0500	mg/L	0.0500	1	10/20/23 18:35	BKN	EPA-200.7
Titanium	<0.0100	mg/L	0.0100	1	10/20/23 18:35	BKN	EPA-200.7
Antimony	<0.0100	mg/L	0.0100	1	10/20/23 18:35	BKN	EPA-200.7
Arsenic	<0.0100	mg/L	0.0100	1	10/20/23 18:35	BKN	EPA-200.7
Beryllium	<0.0010	mg/L	0.0010	1	10/20/23 18:35	BKN	EPA-200.7
Cadmium	<0.0020	mg/L	0.0020	1	10/20/23 18:35	BKN	EPA-200.7
Chromium	<0.0050	mg/L	0.0050	1	10/20/23 18:35	BKN	EPA-200.7
Copper	<0.0050	mg/L	0.0050	1	10/20/23 18:35	BKN	EPA-200.7
Lead	<0.0060	mg/L	0.0060	1	10/20/23 18:35	BKN	EPA-200.7
Mercury	<0.00020	mg/L	0.00020	1	10/23/23 14:04	FDS	EPA-245.1
Nickel	<0.0050	mg/L	0.0050	1	10/20/23 18:35	BKN	EPA-200.7
Selenium	<0.0100	mg/L	0.0100	1	10/20/23 18:35	BKN	EPA-200.7
Silver	<0.0050	mg/L	0.0050	1	10/20/23 18:35	BKN	EPA-200.7
Thallium	< 0.0200	mg/L	0.0200	1	10/20/23 18:35	BKN	EPA-200.7

Qualifiers/ Definitions

DF

**Dilution Factor** 

MQL

Method Quantitation Limit



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence , AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table B

Report Date: 10/30/2023 Received: 10/19/2023

andrew Brunghold

Andrea R. Brownfield Project manager

Report Number : 23-292-0097

REPORT OF ANALYSIS

Lab No : 90231 Sample ID : DSN0011 (Composite)					Matrix: Aqu Sampled: 10,		
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Zinc	<0.0200	mg/L	0.0200	1	10/20/23 18:35	BKN	EPA-200.7
Analytical Method: 625.1 Prep Method: 625.1		Prep Batch(es):	L713147	10/25/23 13:47	7		
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
2-Chlorophenol	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
2,4-Dichlorophenol	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
2,4-Dimethylphenol	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
4,6-Dinitro-o-cresol	<50.0	μg/L	50.0	5	10/26/23 01:43	VBW	L713244
2,4-Dinitrophenol	<100	μg/L	100	5	10/26/23 01:43	VBW	L713244
2-Nitrophenol	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
4-Nitrophenol	<50.0	µg/L	50.0	5	10/26/23 01:43	VBW	L713244
p-Chloro-m-cresol	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Pentachlorophenol	<25.0	µg/L	25.0	5	10/26/23 01:43	VBW	L713244

µg/L

µg/L

µg/L

µg/L

µg/L

µg/L

µg/L

µg/L

Qualifiers/ Definitions

Benzo(a)pyrene

Benzo(a)anthracene

Phenol

2,4,6-Trichlorophenol

Acenaphthene

Acenaphthylene

Anthracene

Benzidine

DF

Dilution Factor

<25.0

<25.0

<10.0

<10.0

<10.0

<100

<10.0

<10.0

MQL

25.0

25.0

10.0

10.0

10.0

100

10.0

10.0

Method Quantitation Limit

5 10/26/23 01:43 VBW

L713244

L713244

L713244

L713244

L713244

L713244

L713244

L713244



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table B

Report Date: 10/30/2023 Received: 10/19/2023

Andrea R. Brownfield Project manager

Report Number: 23-292-0097

REPORT OF ANALYSIS

Lab No:

90231

Sample ID : DSN0011 (Composite)

Matrix: Aqueous

Sampled: 10/18/2023 9:40

Analytical Method: 625.1 Prep Method: 625.1	Pre	p Batch(es):	<b>L713147</b> 10,	25/23 13:4			
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
3,4-Benzofluoranthene	<10.0	µg/L	10.0	5	10/26/23 01:43	VBW	L713244
Benzo(g,h,i)perylene	<10.0	μg/L	10.0	5	10/26/23 01:43	VBW	L713244
Benzo(k)fluoranthene	<10.0	µg/L	10.0	5	10/26/23 01:43	VBW	L713244
Bis(2-Chloroethoxy)methane	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Bis(2-Chloroethyl)ether	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Bis(2-Chloroisopropyl)ether	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Bis(2-ethylhexyl)phthalate	<50.0	μg/L	50.0	5	10/26/23 01:43	VBW	L713244
4-Bromophenyl phenyl ether	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Butyl benzyl phthalate	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
2-Chloronaphthalene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
1-Chlorophenyl phenyl ether	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Chrysene	<10.0	µg/L	10.0	5	10/26/23 01:43	VBW	L713244
Dibenzo(a,h)anthracene	<10.0	μg/L	10.0	5	10/26/23 01:43	VBW	L713244
1,2-Dichlorobenzene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
1,3-Dichlorobenzene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
1,4-Dichlorobenzene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
3,3'-Dichlorobenzidine	<50.0	μg/L	50.0	5	10/26/23 01:43	VBW	L713244
Diethyl phthalate	<25.0	µg/L	25.0	5	10/26/23 01:43	VBW	L713244
Dimethyl phthalate	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Di-n-butyl phthalate	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
2,4-Dinitrotoluene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
2,6-Dinitrotoluene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244

Qualifiers/ **Definitions** 

DF

Dilution Factor

MQL

Method Quantitation Limit



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table B

Report Date: 10/30/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

Report Number: 23-292-0097

REPORT OF ANALYSIS

Lab No: 90231

Sample ID: DSN0011 (Composite)

Matrix: Aqueous Sampled: 10/18/2023 9:40

Analytical Method: 625.1

Prep Batch(es):

L713147 10/25/23 13:47

Test	Results	Units	MOI				
			MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
Di-n-Octyl Phthalate	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
1,2-Diphenylhydrazine/Azobenzene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Fluoranthene	<10.0	μg/L	10.0	5	10/26/23 01:43	VBW	L713244
Fluorene	<10.0	μg/L	10.0	5	10/26/23 01:43	VBW	L713244
Hexachlorobenzene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Hexachlorobutadiene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Hexachlorocyclopentadiene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Hexachloroethane	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Indeno(1,2,3-cd)pyrene	<10.0	μg/L	10.0	5	10/26/23 01:43	VBW	L713244
Isophorone	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Naphthalene	<10.0	μg/L	10.0	5	10/26/23 01:43	VBW	L713244
Nitrobenzene	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
N-Nitrosodimethylamine	<25.0	µg/L	25.0	5	10/26/23 01:43	VBW	L713244
N-Nitroso-di-n-propylamine	<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
N-Nitrosodiphenylamine	<50.0	μg/L	50.0	5	10/26/23 01:43	VBW	L713244

μg/L

µg/L

<10.0

<10.0

Phenanthrene

Pyrene

10.0

10.0

5 10/26/23 01:43 VBW

5 10/26/23 01:43 VBW

L713244

L713244



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table B

Report Date: 10/30/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

Report Number: 23-292-0097

REPORT OF ANALYSIS

Lab No:

90231

Sample ID: DSN0011 (Composite)

Matrix: Aqueous

Sampled: 10/18/2023 9:40

Analytical Method:

L713147 10/25/23 13:47

Prep Method: 62!		Pre	ep Batch(es):	L/1314/ 10/25/2	23 13:4	/		
Test		Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
1,2,4-Trichlorobenzene		<25.0	μg/L	25.0	5	10/26/23 01:43	VBW	L713244
Surrogate: 2-Fluoro	biphenyl	80	0.9	Limits: 30-107%	ò	5 10/26/23 01:4	3 VBW	L713244
Surrogate: 2-Fluoro	phenol	31	l.1	Limits: 8-88%		5 10/26/23 01:4	3 VBW	L713244
Surrogate: Nitroben	zene-d5	71	1.4	Limits: 29-105%	ò	5 10/26/23 01:4	3 VBW	L713244
Surrogate: Phenol-o	16	18	3.9	Limits: 7-58%		5 10/26/23 01:4	3 VBW	L713244
Surrogate: 4-Terpho	enyl-d14	1	13	Limits: 30-130%	ò	5 10/26/23 01:4	3 VBW	L713244
Surrogate: 2,4,6-Tr	ibromophenol	60	0.1	Limits: 16-138%	ó	5 10/26/23 01:4	3 VBW	L713244



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table B

Report Date: 10/30/2023 Received: 10/19/2023

Report Number: 23-292-0097

REPORT OF ANALYSIS

Andrea R. Brownfield Project manager

Lab No:

90232

Matrix: Aqueous

Sample ID : DSN0011 (Grab)					Sampled:	10/1	8/2023 10:00
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	10/30/23 10:15	CNB	4500CNE-2016
Analytical Method: 624.1	Pr	ep Batch(es):	L712432	10/20/23 08:18	8		
Prep Method: 624.1							
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
Acrolein	<20.0	μg/L	20.0	1	10/20/23 18:32	HRS	L712459
Acrylonitrile	<20.0	μg/L	20.0	1	10/20/23 18:32	HRS	L712459
Benzene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Bromoform	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Carbon Tetrachloride	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Chlorobenzene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Chlorodibromomethane	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Chloroethane	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
2-Chloroethylvinyl Ether	<5.00	μg/L	5.00	1	10/20/23 18:32	HRS	L712459
Chloroform	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Dichlorobromomethane	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459

Qualifiers/ **Definitions** 

Dichlorodifluoromethane

1,1-Dichloroethane

1,2-Dichloroethane

1,1-Dichloroethylene

1,2-Dichloropropane

1,3-Dichloro-propylene

DF

**Dilution Factor** 

<1.00

<1.00

<1.00

<1.00

<1.00

<1.00

µg/L

µg/L

µg/L

µg/L

µg/L

µg/L

MQL

1.00

1.00

1.00

1.00

1,00

1.00

Method Quantitation Limit

1 10/20/23 18:32 HRS

1 10/20/23 18:32

L712459

L712459

L712459

L712459

L712459

L712459



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence , AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table B

Report Date: 10/30/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

REPORT OF ANALYSIS

Lab No:

90232

Report Number: 23-292-0097

Sample ID : DSN0011 (Grab)

Matrix: Aqueous

Sampled: 10/18/2023 10:00

**Analytical Method:** 624.1 **Prep Batch(es):** L712432 10/20/23 08:18

Prep Method: 624.1

Prep Method: 624.1							
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
Ethylbenzene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Methyl Bromide	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Methyl Chloride	<1.00	µg/L	1.00	1	10/20/23 18:32	HRS	L712459
Methylene Chloride	<10.0	μg/L	10.0	1	10/20/23 18:32	HRS	L712459
1,1,2,2-Tetrachloroethane	<1.00	µg/L	1.00	1	10/20/23 18:32	HRS	L712459
Tetrachioroethylene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Toluene	<5.00	μg/L	5.00	1	10/20/23 18:32	HRS	L712459
1,2-trans-Dichloroethylene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
1,1,1-Trichloroethane	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
1,1,2-Trichloroethane	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Trichloroethylene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Trichlorofluoromethane	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Vinyl Chloride	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
cis-1,3-Dichloropropene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
trans-1,3-Dichloropropene	<1.00	μg/L	1.00	1	10/20/23 18:32	HRS	L712459
Surrogate: 4-Bromofluorobenzene	11	1	Limits: 71-131%		1 10/20/23 18:3	32 HRS	L712459
Surrogate: Dibromofluoromethane	11	3	Limits: 70-128%		1 10/20/23 18:3	32 HRS	L712459
Surrogate: 1,2-Dichloroethane - d4	86.	0	Limits: 67-136%		1 10/20/23 18:3	32 HRS	L712459
Surrogate: Toluene-d8	91.	8	Limits: 70-130%		1 10/20/23 18:3	32 HRS	L712459

Qualifiers/ Definitions

DF

Dilution Factor

MQL

Method Quantitation Limit



### **Quality Control Data**

Client ID:

Southern Environmental Engineering

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Analytical Batch:

L713998

**Analysis Method:** 

4500CNE-2016

**Analysis Description:** 

Total Cyanide

Units

Units

Units

Lab Reagent Blank

LRB

Matrix: AQU

Associated Lab Samples: 90232

**Parameter** 

Blank Result MQL

**Analyzed** 

Cyanide, Total

< 0.005 mg/L

0.005

10/30/23 10:15

**Laboratory Control Sample** 

LCS

**Parameter** 

**Spike** Conc.

LCS Result

LCS %Rec

% Rec Limits

Cyanide, Total

mg/L 0.200 0.201

101

MSD

Result

90-110

Matrix Spike & Matrix Spike Duplicate

L 92682-MS

L 92682-MSD

**Parameter** 

Cyanide, Total

Result mg/L < 0.005

0.204

**MS Spike** 

Conc.

Conc. 0.204

MSD

**Spike** 

0.195 0.198

**MS Result** 

97.0

MS

%Rec

96.0

MSD

%Rec

70-130

%Rec

Limits RPD

1.5 20.0

Max

RPD



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L712432

QC Analytical Batch(es): L712459

QC Prep Batch Method: 624.1

**Analysis Method:** 

**Analysis Description:** 

Volatile Organic Compounds - GC/MS

Lab Reagent Blank

Associated Lab Samples: 90232

LRB-L712432

Matrix: AQU

Parameter	Units	Blank Result	MQL	Analyzed	% Recovery	% Rec Limits
Acrolein	μg/L	< 20.0	20.0	10/20/23 11:35	TOR	
Acrylonitrile	μg/L	< 20.0	20.0	10/20/23 11:35		
Benzene	μg/L	< 1.00	1.00	10/20/23 11:35		
Bromodichloromethane	μg/L	< 1.00	1.00	10/20/23 11:35		
Bromoform	μg/L	< 1.00	1.00	10/20/23 11:35		
Bromomethane	μg/L	< 1.00	1.00	10/20/23 11:35		
Carbon Tetrachloride	μg/L	< 1.00	1.00	10/20/23 11:35		
Chlorobenzene	μg/L	< 1.00	1.00	10/20/23 11:35		
Chlorodibromomethane	μg/L	< 1.00	1.00	10/20/23 11:35		
Chloroethane	μg/L	< 1.00	1.00	10/20/23 11:35		
2-Chloroethylvinyl Ether	μg/L	< 5.00	5.00	10/20/23 11:35		
Chloroform	μg/L	< 1.00	1.00	10/20/23 11:35		
Chloromethane	μg/L	< 1.00	1.00	10/20/23 11:35		
Dichlorodifluoromethane	μg/L	< 1.00	1.00	10/20/23 11:35		
1,1-Dichloroethane	μg/L	< 1.00	1.00	10/20/23 11:35		
1,2-Dichloroethane	μg/L	< 1.00	1.00	10/20/23 11:35		
1,1-Dichloroethene	μg/L	< 1.00	1.00	10/20/23 11:35		
trans-1,2-Dichloroethene	μg/L	< 1.00	1.00	10/20/23 11:35		
1,2-Dichloropropane	μg/L	< 1.00	1.00	10/20/23 11:35		
cis-1,3-Dichloropropene	μg/L	< 1.00	1.00	10/20/23 11:35		
trans-1,3-Dichloropropene	μg/L	< 1.00	1.00	10/20/23 11:35		
Ethylbenzene	μg/L	< 1.00	1.00	10/20/23 11:35		
Methylene Chloride	μg/L	< 10.0	10.0	10/20/23 11:35		
1,1,2,2-Tetrachloroethane	μg/L	< 1.00	1.00	10/20/23 11:35		
Tetrachloroethene	μg/L	< 1.00	1.00	10/20/23 11:35		
Toluene	µg/L	< 5.00	5.00	10/20/23 11:35		
1,1,1-Trichloroethane	μg/L	< 1.00	1.00	10/20/23 11:35		

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### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L712432

QC Analytical Batch(es): L712459

**Analysis Method:** 

624.1

QC Prep Batch Method: 624.1

**Analysis Description:** 

Volatile Organic Compounds - GC/MS

Lab Reagent Blank

Associated Lab Samples: 90232

Matrix: AQU

Parameter	Units	Blank Result	MQL	Analyzed	% Recovery	% Rec Limits
1,1,2-Trichloroethane	μg/L	< 1.00	1.00	10/20/23 11:35		2.2
Trichloroethene	μg/L	< 1.00	1.00	10/20/23 11:35		
Trichlorofluoromethane	μg/L	< 1.00	1.00	10/20/23 11:35		
Vinyl Chloride	μg/L	< 1.00	1.00	10/20/23 11:35		
4-Bromofluorobenzene (S)				10/20/23 11:35	100	71-131
Dibromofluoromethane (S)				10/20/23 11:35	106	70-128
1,2-Dichloroethane - d4 (S)				10/20/23 11:35	77.2	67-136
Toluene-d8 (S)				10/20/23 11:35	96.2	70-130

**Laboratory Control Sample** 

LCS-L712432

LRB-L712432

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Acrolein	μg/L	100	62.4	62.4	40-140	
Acrylonitrile	μg/L	100	60.1	60.1	40-140	
Benzene	μg/L	20.0	14.7	73.5	65-135	
Bromodichloromethane	μg/L	20.0	16.9	84.5	65-135	
Bromoform	μg/L	20.0	25.6	128	70-130	
Bromomethane	μg/L	20.0	12.4	62.0	15-242	
Carbon Tetrachloride	μg/L	20.0	21.6	108	70-130	
Chlorobenzene	μg/L	20.0	18.8	94.0	65-135	
Chlorodibromomethane	μg/L	20.0	19.3	96.5	50-150	
Chloroethane	μg/L	20.0	15.2	76.0	40-160	
2-Chloroethylvinyl Ether	µg/L	20.0	< 5.00	0.0*	5-225	
Chloroform	μg/L	20.0	17.5	87.5	70-135	
Chloromethane	μg/L	20.0	9.60	48.0	1-205	
Dichlorodifluoromethane	μg/L	20.0	23.6	118	30-160	
1,1-Dichloroethane	μg/L	20.0	15.2	76.0	70-130	

\* QC Fail

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L712432

QC Prep Batch Method: 624.1

QC Analytical Batch(es):

L712459

**Analysis Method:** 

624.1

**Analysis Description:** 

Volatile Organic Compounds - GC/MS

**Laboratory Control Sample** 

LCS-L712432

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
1,2-Dichloroethane	μg/L	20.0	16.9	84.5	70-130	
1,1-Dichloroethene	µg/L	20.0	13.7	68.5	50-150	
trans-1,2-Dichloroethene	μg/L	20.0	14.5	72.5	70-130	
1,2-Dichloropropane	μg/L	20.0	11.1	55.5	35-165	
cis-1,3-Dichloropropene	µg/L	20.0	13.2	66.0	25-175	
trans-1,3-Dichloropropene	μg/L	20.0	12.7	63.5	50-150	
Ethylbenzene	µg/L	20.0	15.0	75.0	60-140	
Methylene Chloride	μg/L	20.0	12.5	62.5	60-140	
1,1,2,2-Tetrachloroethane	µg/L	20.0	15.6	78.0	60-140	
Tetrachloroethene	μg/L	20.0	22.2	111	70-160	
Toluene	μg/L	20.0	16.5	82.5	70-130	
1,1,1-Trichloroethane	μg/L	20.0	20.7	104	70-130	
1,1,2-Trichloroethane	μg/L	20.0	15.6	78.0	70-130	
Trichloroethene	μg/L	20.0	17.1	85.5	60-135	
Trichlorofluoromethane	μg/L	20.0	21.8	109	50-150	
Vinyl Chloride	μg/L	20.0	8.87	44.3	5-195	
4-Bromofluorobenzene (S)				101	71-131	
Dibromofluoromethane (S)				109	70-128	
1,2-Dichloroethane - d4 (S)				83.0	67-136	
Toluene-d8 (S)				100	70-130	

Matrix Spike & Matrix Spike Duplicate

L 90190-MS-L712432 L 90190-MSD-L712432

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Acrolein	μg/L	< 20.0	100	100	22.2	22.1	22.2*	22.1*	40-160	0.4	60.0
Acrylonitrile	μg/L	< 20.0	100	100	57.2	56.3	57.2	56.3	40-160	1.5	60.0

\* QC Fail

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L712432

L/12432

QC Prep Batch Method: 624.1

QC Analytical Batch(es):

: L712459

**Analysis Method:** 

624.1

**Analysis Description:** 

Volatile Organic Compounds - GC/MS

Matrix Spike & Matrix Spike Duplicate

L 90190-MS-L712432

L 90190-MSD-L712432

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Benzene	μg/L	< 1.00	20.0	20.0	12.4	11.6	62.0	58.0	37-151	6.6	61.0
Bromodichloromethane	μg/L	< 1.00	20.0	20.0	21.7	19.6	109	98.0	35-155	10.1	56.0
Bromoform	μg/L	< 1.00	20.0	20.0	31.6	28.1	158	141	45-169	11.7	42.0
Bromomethane	μg/L	< 1.00	20.0	20.0	9.12	8.37	45.6	41.8	1-242	8.5	61.0
Carbon Tetrachloride	μg/L	< 1.00	20.0	20.0	20.4	24.8	102	124	70-140	19.4	41.0
Chlorobenzene	μg/L	< 1.00	20.0	20.0	17.4	20.0	87.0	100	37-160	13.9	53.0
Chlorodibromomethane	μg/L	< 1.00	20.0	20.0	27.2	22.9	136	115	53-149	17.1	50.0
Chloroethane	μg/L	< 1.00	20.0	20.0	12.5	14.1	62.5	70.5	14-230	12.0	78.0
2-Chloroethylvinyl Ether	μg/L	< 5.00	20.0	20.0	< 5.00	< 5.00	0.0*	0.0*	5-305	0.0	71.0
Chloroform	μg/L	< 1.00	20.0	20.0	13.9	18.4	69.5	92.0	51-138	27.8	54.0
Chloromethane	μg/L	< 1.00	20.0	20.0	7.57	9.01	37.8	45.0	1-273	17.3	60.0
Dichlorodifluoromethane	μg/L	< 1.00	20.0	20.0	15.1	17.4	75.5	87.0	50-150	14.1	60.0
1,1-Dichloroethane	μg/L	< 1.00	20.0	20.0	13.0	16.3	65.0	81.5	59-155	22.5	49.0
1,2-Dichloroethane	μg/L	< 1.00	20.0	20.0	16.8	15.1	84.0	75.5	49-155	10.6	49.0
1,1-Dichloroethene	μg/L	< 1.00	20.0	20.0	11.0	14.1	55.0	70.5	1-234	24.7	32.0
trans-1,2-Dichloroethene	μg/L	< 1.00	20.0	20.0	13.0	15.9	65.0	79.5	54-156	20.0	45.0
1,2-Dichloropropane	μg/L	< 1.00	20.0	20.0	16.4	14.4	82.0	72.0	1-210	12.9	55.0
cis-1,3-Dichloropropene	μg/L	< 1.00	20.0	20.0	12.6	10.3	63.0	51.5	1-227	20.0	58.0
trans-1,3-Dichloropropene	μg/L	< 1.00	20.0	20.0	18.2	14.2	91.0	71.0	17-183	24.6	86.0
Ethylbenzene	μg/L	< 1.00	20.0	20.0	13.6	16.5	68.0	82.5	37-162	19.2	63.0
Methylene Chloride	μg/L	< 10.0	20.0	20.0	12.4	14.4	62.0	72.0	5-221	14.9	28.0
1,1,2,2-Tetrachloroethane	μg/L	< 1.00	20.0	20.0	17.5	15.5	87.5	77.5	46-157	12.1	61.0
Tetrachloroethene	μg/L	< 1.00	20.0	20.0	24.6	25.4	123	127	64-148	3.2	39.0
Toluene	μg/L	17.5	20.0	20.0	37.9	28.2	102	53.5	47-150	29.3	41.0
1,1,1-Trichloroethane	μg/L	< 1.00	20.0	20.0	16.0	23.3	80.0	117	52-162	37.1*	36.0
1,1,2-Trichloroethane	μg/L	< 1.00	20.0	20.0	22.2	18.1	111	90.5	52-150	20.3	45.0

\* QC Fail

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### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L712432

QC Analytical Batch(es): L712459

QC Prep Batch Method: 624.1

**Analysis Method:** 

624.1

**Analysis Description:** 

Volatile Organic Compounds - GC/MS

Matrix Spike & Matrix Spike Duplicate

L 90190-MS-L712432

L 90190-MSD-L712432

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Trichloroethene	μg/L	< 1.00	20.0	20.0	18.7	17.9	93.5	89.5	70-157	4.3	48.0
Trichlorofluoromethane	μg/L	< 1.00	20.0	20.0	19.3	22.0	96.5	110	17-181	13.0	48.0
Vinyl Chloride	µg/L	< 1.00	20.0	20.0	6.85	7.12	34.2	35.6	1-251	3.8	66.0
4-Bromofluorobenzene (S)							126	120	71-131		
Dibromofluoromethane (S)							84.2	109	70-128		
1,2-Dichloroethane - d4 (S)							77.6	72.6	67-136		
Toluene-d8 (S)							119	84.6	70-130		

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L713147

QC Analytical Batch(es): L713244

QC Prep Batch Method: 625.1

**Analysis Method:** 

625.1

**Analysis Description:** 

Semivolatile Organic Compounds - GC/MS

Lab Reagent Blank

Associated Lab Samples: 90231

LRB-L713147 Matrix: AQU

Parameter	Units	Blank Result	MQL	Analyzed	% Recovery	% Rec Limits
Acenaphthene	μg/L	< 2.00	2.00	10/25/23 16:08		
Acenaphthylene	μg/L	< 2.00	2.00	10/25/23 16:08		
Anthracene	μg/L	< 2.00	2.00	10/25/23 16:08		
Benzidine	μg/L	< 20.0	20.0	10/25/23 16:08		
Benzo(a)anthracene	μg/L	< 2.00	2.00	10/25/23 16:08		
Benzo(a)pyrene	μg/L	< 2.00	2.00	10/25/23 16:08		
Benzo(b)fluoranthene	μg/L	< 2.00	2.00	10/25/23 16:08		
Benzo(g,h,i)perylene	μg/L	< 2.00	2.00	10/25/23 16:08		
Benzo(k)fluoranthene	μg/L	< 2.00	2.00	10/25/23 16:08		
Bis(2-Chloroethoxy)methane	μg/L	< 5.00	5.00	10/25/23 16:08		
Bis(2-Chloroethyl)ether	μg/L	< 5.00	5.00	10/25/23 16:08		
Bis(2-Chloroisopropyl)ether	µg/L	< 5.00	5.00	10/25/23 16:08		
Bis(2-ethylhexyl)phthalate	μg/L	< 10.0	10.0	10/25/23 16:08		
1-Bromophenyl phenyl ether	μg/L	< 5.00	5.00	10/25/23 16:08		
Butyl benzyl phthalate	μg/L	< 5.00	5.00	10/25/23 16:08		
4-Chloro-3-methylphenol	μg/L	< 5.00	5.00	10/25/23 16:08		
2-Chloronaphthalene	μg/L	< 5.00	5.00	10/25/23 16:08		
2-Chlorophenol	μg/L	< 5.00	5.00	10/25/23 16:08		
4-Chlorophenyl phenyl ether	μg/L	< 5.00	5.00	10/25/23 16:08		
Chrysene	μg/L	< 2.00	2.00	10/25/23 16:08		
Dibenz(a,h)anthracene	μg/L	< 2.00	2.00	10/25/23 16:08		
1,2-Dichlorobenzene	μg/L	< 5.00	5.00	10/25/23 16:08		
1,3-Dichlorobenzene	μg/L	< 5.00	5.00	10/25/23 16:08		
1,4-Dichlorobenzene	μg/L	< 5.00	5.00	10/25/23 16:08		
3,3'-Dichlorobenzidine	μg/L	< 10.0	10.0	10/25/23 16:08		
2,4-Dichlorophenol	μg/L	< 5.00	5.00	10/25/23 16:08		
Diethyl phthalate	μg/L	< 5.00	5.00	10/25/23 16:08		

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### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

QC Prep Batch Method: 625.1

L713147

QC Analytical Batch(es): L713244

**Analysis Method:** 

**Analysis Description:** 

Semivolatile Organic Compounds - GC/MS

Lab Reagent Blank

Associated Lab Samples: 90231

LRB-L713147

Matrix: AQU

Parameter	Units	Blank Result	MQL	Analyzed	% Recovery	% Rec Limits
Dimethyl phthalate	μg/L	< 5.00	5.00	10/25/23 16:08		
2,4-Dimethylphenol	μg/L	< 5.00	5.00	10/25/23 16:08		
Di-n-butyl phthalate	μg/L	< 5.00	5.00	10/25/23 16:08		
4,6-Dinitro-2-methylphenol	μg/L	< 10.0	10.0	10/25/23 16:08		
2,4-Dinitrophenol	μg/L	< 20.0	20.0	10/25/23 16:08		
2,4-Dinitrotoluene	μg/L	< 5.00	5.00	10/25/23 16:08		
2,6-Dinitrotoluene	μg/L	< 5.00	5.00	10/25/23 16:08		
Di-n-Octyl Phthalate	μg/L	< 5.00	5.00	10/25/23 16:08		
1,2-Diphenylhydrazine/Azobenzene	μg/L	< 5.00	5.00	10/25/23 16:08		
Fluoranthene	μg/L	< 2.00	2.00	10/25/23 16:08		
Fluorene	μg/L	< 2.00	2.00	10/25/23 16:08		
Hexachlorobenzene	μg/L	< 5.00	5.00	10/25/23 16:08		
Hexachlorobutadiene	μg/L	< 5.00	5.00	10/25/23 16:08		
Hexachlorocyclopentadiene	μg/L	< 5.00	5.00	10/25/23 16:08		
Hexachloroethane	μg/L	< 5.00	5.00	10/25/23 16:08		
Indeno(1,2,3-cd)pyrene	μg/L	< 2.00	2.00	10/25/23 16:08		
Isophorone	μg/L	< 5.00	5.00	10/25/23 16:08		
Naphthalene	μg/L	< 2.00	2.00	10/25/23 16:08		
Nitrobenzene	µg/L	< 5.00	5.00	10/25/23 16:08		
2-Nitrophenol	μg/L	< 5.00	5.00	10/25/23 16:08		
4-Nitrophenol	μg/L	< 10.0	10.0	10/25/23 16:08		
N-Nitrosodimethylamine	μg/L	< 5.00	5.00	10/25/23 16:08		
N-Nitrosodiphenylamine	μg/L	< 10.0	10.0	10/25/23 16:08		
N-Nitroso-di-n-propylamine	μg/L	< 5.00	5.00	10/25/23 16:08		
Pentachlorophenol	μg/L	< 5.00	5.00	10/25/23 16:08		
Phenanthrene	μg/L	< 2.00	2.00	10/25/23 16:08		
Phenol	μg/L	< 5.00	5.00	10/25/23 16:08		

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

LRB-L713147

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L713147

QC Analytical Batch(es): L713244

QC Prep Batch Method: 625.1

**Analysis Method:** 

**Analysis Description:** Semivolatile Organic Compounds - GC/MS

Lab Reagent Blank

Associated Lab Samples: 90231

Matrix: AQU

Parameter	Units	Blank Result	MQL	Analyzed	% Recovery	% Rec Limits
Pyrene	μg/L	< 2.00	2.00	10/25/23 16:08		
1,2,4-Trichlorobenzene	μg/L	< 5.00	5.00	10/25/23 16:08		
2,4,6-Trichlorophenol	μg/L	< 5.00	5.00	10/25/23 16:08		
2-Fluorobiphenyl (S)				10/25/23 16:08	63.8	30-107
2-Fluorophenol (S)				10/25/23 16:08	27.1	8-88
Nitrobenzene-d5 (S)				10/25/23 16:08	65.8	29-105
Phenol-d6 (S)				10/25/23 16:08	19.3	7-58
4-Terphenyl-d14 (S)				10/25/23 16:08	74.9	30-130
2,4,6-Tribromophenol (S)				10/25/23 16:08	73.4	16-138

**Laboratory Control Sample & LCSD** 

LCS-L713147

LCSD-L713147

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	%Rec	% Rec	% Rec Limits	RPD	Max RPD
Acenaphthene	μg/L	50.0	35.5	35.7	71.0	71.4	47-145	0.5	20.0
Acenaphthylene	μg/L	50.0	34.4	34.4	68.8	68.8	33-145	0.0	20.0
Anthracene	μg/L	50.0	39.6	40.5	79.2	81.0	27-133	2.2	20.0
Benzidine	μg/L	150	105	118	70.0	78.6	1-176	11.6	20.0
Benzo(a)anthracene	μg/L	50.0	39.3	40.4	78.6	80.8	33-143	2.7	20.0
Benzo(a)pyrene	μg/L	50.0	39.9	41.6	79.8	83.2	17-163	4.1	20.0
Benzo(b)fluoranthene	μg/L	50.0	45.0	40.8	90.0	81.6	24-159	9.7	20.0
Benzo(g,h,i)perylene	μg/L	50.0	31.0	35.6	62.0	71.2	1-219	13.8	20.0
Benzo(k)fluoranthene	μg/L	50.0	41.8	47.3	83.6	94.6	11-162	12.3	20.0
Bis(2-Chloroethoxy)methane	μg/L	50.0	35.6	35.6	71.2	71.2	33-184	0.0	20.0
Bis(2-Chloroethyl)ether	μg/L	50.0	31.8	32.0	63.6	64.0	12-158	0.6	20.0
Bis(2-Chloroisopropyl)ether	µg/L	50.0	28.5	28.3	57.0	56.6	36-166	0.7	20.0
Bis(2-ethylhexyl)phthalate	µg/L	50.0	39.8	41.4	79.6	82.8	8-158	3.9	20.0

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L713147

QC Analytical Batch(es): L713244

QC Prep Batch Method: 625.1

**Analysis Method:** 

625.1

**Analysis Description:** 

Semivolatile Organic Compounds - GC/MS

Laboratory Control Sample & LCSD

LCS-L713147 LCSD-L713147

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS %Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD
4-Bromophenyl phenyl ether	μg/L	50.0	38.2	39.1	76.4	78.2	53-127	2.3	20.0
Butyl benzyl phthalate	μg/L	50.0	39.9	41.3	79.8	82.6	1-152	3.4	20.0
4-Chloro-3-methylphenol	μg/L	50.0	38.0	37.9	76.0	75.8	22-147	0.2	20.0
2-Chloronaphthalene	μg/L	50.0	32.3	32.4	64.6	64.8	50-118	0.3	20.0
2-Chlorophenol	μg/L	50.0	27.6	27.7	55.2	55.4	23-134	0.3	20.0
4-Chlorophenyl phenyl ether	μg/L	50.0	39.4	39.8	78.8	79.6	25-158	1.0	20.0
Chrysene	μg/L	50.0	37.1	37.9	74.2	75.8	17-168	2.1	20.0
Dibenz(a,h)anthracene	μg/L	50.0	34.8	39.7	69.6	79.4	1-227	13.1	20.0
1,2-Dichlorobenzene	μg/L	50.0	29.9	30.0	59.8	60.0	32-129	0.3	20.0
1,3-Dichlorobenzene	μg/L	50.0	28.3	28.5	56.6	57.0	1-172	0.7	20.0
1,4-Dichlorobenzene	μg/L	50.0	29.2	29.3	58.4	58.6	20-124	0.3	20.0
3,3'-Dichlorobenzidine	μg/L	150	110	113	73.3	75.3	1-262	2.6	20.0
2,4-Dichlorophenol	μg/L	50.0	31.9	32.0	63.8	64.0	39-135	0.3	20.0
Diethyl phthalate	μg/L	50.0	42.1	42.5	84.2	85.0	1-114	0.9	20.0
Dimethyl phthalate	μg/L	50.0	39.7	40.6	79.4	81.2	1-112	2.2	20.0
2,4-Dimethylphenol	μg/L	50.0	39.8	39.0	79.6	78.0	32-119	2.0	20.0
Di-n-butyl phthalate	μg/L	50.0	43.6	43.3	87.2	86.6	1-118	0.6	20.0
4,6-Dinitro-2-methylphenol	μg/L	50.0	49.3	51.1	98.6	102	27-128	3.5	20.0
2,4-Dinitrophenol	μg/L	150	112	118	74.6	78.6	1-191	5.2	20.0
2,4-Dinitrotoluene	μg/L	50.0	44.9	45.8	89.8	91.6	39-139	1.9	20.0
2,6-Dinitrotoluene	μg/L	50.0	43.5	44.1	87.0	88.2	50-158	1.3	20.0
Di-n-Octyl Phthalate	μg/L	50.0	46.5	46.0	93.0	92.0	4-146	1.0	20.0
1,2-Diphenylhydrazine/Azobenzene	μg/L	50.0	35.0	35.8	70.0	71.6	35-116	2.2	20.0
Fluoranthene	μg/L	50.0	41.2	40.5	82.4	81.0	26-137	1.7	20.0
Fluorene	μg/L	50.0	38.6	39.1	77.2	78.2	59-121	1.2	20.0
Hexachlorobenzene	µg/L	50.0	38.6	39.6	77.2	79.2	1-152	2.5	20.0

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L713147

QC Prep Batch Method: 625.1

QC Analytical Batch(es): L713244

**Analysis Method:** 

625.1

**Analysis Description:** 

Semivolatile Organic Compounds - GC/MS

**Laboratory Control Sample & LCSD** 

LCS-L713147 LCSD-L713147

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS %Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD
Hexachlorobutadiene	μg/L	50.0	31.6	31.6	63.2	63.2	24-118	0.0	20.0
Hexachlorocyclopentadiene	μg/L	50.0	35.2	32.9	70.4	65.8	10-102	6.7	20.0
Hexachloroethane	μg/L	50.0	30.8	31.1	61.6	62.2	40-113	0.9	20.0
Indeno(1,2,3-cd)pyrene	μg/L	50.0	35.1	39.4	70.2	78.8	1-171	11.5	20.0
Isophorone	μg/L	50.0	23.8	24.1	47.6	48.2	21-196	1.2	20.0
Naphthalene	μg/L	50.0	32.5	31.5	65.0	63.0	21-133	3.1	20.0
Nitrobenzene	μg/L	50.0	34.5	34.9	69.0	69.8	35-180	1.1	20.0
2-Nitrophenol	μg/L	50.0	39.2	39.9	78.4	79.8	29-182	1.7	20.0
4-Nitrophenol	μg/L	50.0	13.6	14.2	27.2	28.4	1-132	4.3	20.0
N-Nitrosodimethylamine	μg/L	50.0	17.8	18.1	35.6	36.2	14-84	1.6	20.0
N-Nitrosodiphenylamine	μg/L	50.0	32.6	33.4	65.2	66.8	45-135	2.4	20.0
N-Nitroso-di-n-propylamine	μg/L	50.0	35.3	35.2	70.6	70.4	1-230	0.2	20.0
Pentachlorophenol	μg/L	50.0	41.7	42.5	83.4	85.0	14-176	1.9	20.0
Phenanthrene	μg/L	50.0	38.8	39.9	77.6	79.8	54-120	2.7	20.0
Phenol	μg/L	50.0	10.7	10.5	21.4	21.0	5-112	1.8	20.0
Pyrene	μg/L	50.0	42.1	45.7	84.2	91.4	70-120	8.2	20.0
1,2,4-Trichlorobenzene	μg/L	50.0	31.4	31.6	62.8	63.2	30-130	0.6	20.0
2,4,6-Trichlorophenol	μg/L	50.0	39.0	39.3	78.0	78.6	37-144	0.7	20.0
2-Fluorobiphenyl (S)					61.2	61.7	30-107		
2-Fluorophenol (S)					26.7	26.6	8-88		
Nitrobenzene-d5 (S)					63.2	63.7	29-105		
Phenol-d6 (S)					19.2	19.3	7-58		
4-Terphenyl-d14 (S)					82.2	88.6	30-130		
2,4,6-Tribromophenol (S)					76.6	79.5	16-138		

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### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L711991

QC Prep Batch Method: EPA-200.7 (PREP)

QC Analytical Batch(es):

L712226

**Analysis Method:** 

EPA-200.7

**Analysis Description:** 

Total Metals

Lab Reagent Blank

LRB-L711991

Matrix: AQU

Associated Lab Samples: 90231

Blank MQL **Analyzed Parameter** Units Result Aluminum < 0.100 0.100 10/20/23 11:01 mg/L 0.0100 < 0.0100 10/20/23 11:01 Antimony mg/L Arsenic mg/L < 0.01000.0100 10/20/23 11:01 mg/L < 0.0100 0.0100 10/20/23 11:01 **Barium** mg/L < 0.00100.0010 10/20/23 11:01 Beryllium Boron mg/L < 0.05000.0500 10/20/23 11:01 Cadmium mg/L < 0.00200.0020 10/20/23 11:01 mg/L < 0.0050 Chromium 0.0050 10/20/23 11:01 Cobalt mg/L < 0.0100 0.0100 10/20/23 11:01 Copper mg/L < 0.00500.0050 10/20/23 11:01 < 0.100 0.100 10/20/23 11:01 Iron mg/L mg/L < 0.0060 0.0060 10/20/23 11:01 Lead 0.100 10/20/23 11:01 Magnesium mg/L < 0.100 mg/L < 0.0100 0.0100 10/20/23 11:01 Manganese mg/L < 0.00500.0050 10/20/23 11:01 Molybdenum Nickel mg/L < 0.0050 0.0050 10/20/23 11:01 < 0.0100 0.0100 10/20/23 11:01 Selenium mg/L 10/20/23 11:01 0.0050 Silver mg/L < 0.0050mg/L < 0.050010/20/23 11:01 Tin 0.0500 mg/L < 0.01000.0100 10/20/23 11:01 Titanium 0.0200 10/20/23 11:01 mg/L < 0.0200Thallium mg/L < 0.0200 0.0200 10/20/23 11:01 Zinc

**Laboratory Control Sample** 

LCS-L711991

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Aluminum	mg/L	10.0	9.74	97.0	85-115	

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#### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L711991

QC Prep Batch Method: EPA-200.7 (PREP)

QC Analytical Batch(es): L712226

**Analysis Method:** 

EPA-200.7

**Analysis Description:** 

Total Metals

**Laboratory Control Sample** 

LCS-L711991

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Antimony	mg/L	0.100	0.0901	90.0	85-115	
Arsenic	mg/L	0.100	0.0976	98.0	85-115	
Barium	mg/L	1.00	0.986	99.0	85-115	
eryllium	mg/L	0.100	0.0991	99.0	85-115	
oron	mg/L	1.00	0.965	97.0	85-115	
admium	mg/L	0.100	0.100	100	85-115	
hromium	mg/L	1.00	1.02	102	85-115	
obalt	mg/L	1.00	1.01	101	85-115	
opper	mg/L	1.00	0.996	100	85-115	
ron	mg/L	10.0	9.94	99.0	85-115	
ead	mg/L	0.100	0.101	101	85-115	
agnesium	mg/L	10.0	9.62	96.0	85-115	
langanese	mg/L	1.00	1.00	100	85-115	
lolybdenum	mg/L	1.00	0.969	97.0	85-115	
ickel	mg/L	1.00	1.02	102	85-115	
elenium	mg/L	0.100	0.0947	95.0	85-115	
ilver	mg/L	0.100	0.0961	96.0	85-115	
in	mg/L	1.00	0.974	97.0	85-115	
ītanium	mg/L	1.00	0.966	97.0	85-115	
hallium	mg/L	0.100	0.100	100	85-115	
inc	mg/L	1.00	1.03	103	85-115	

Matrix Spike & Matrix Spike Duplicate

Q 93129-MS-L711991

Q 93129-MSD-L711991

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Aluminum	mg/L	0.140	10.0	10.0	9.86	10.3	97.0	102	70-130	4.3	20.0

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L711991

QC Analytical Batch(es): L712226

QC Prep Batch Method: EPA-200.7 (PREP)

**Analysis Method:** 

EPA-200.7

**Analysis Description:** 

Total Metals

Matrix Spike & Matrix Spike Duplicate

Q 93129-MS-L711991

Q 93129-MSD-L711991

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Antimony	mg/L	< 0.0100	0.100	0.100	0.102	0.103	102	103	70-130	0.9	20.0
Arsenic	mg/L	< 0.0100	0.100	0.100	0.0989	0.104	99.0	104	70-130	5.0	20.0
Barium	mg/L	< 0.0100	1.00	1.00	0.994	1.05	99.0	105	70-130	5.4	20.0
Beryllium	mg/L	< 0.0010	0.100	0.100	0.0978	0.102	98.0	102	70-130	4.2	20.0
Boron	mg/L	0.415	1.00	1.00	1.46	1.49	105	108	70-130	2.0	20.0
Cadmium	mg/L	< 0.0020	0.100	0.100	0.100	0.105	100	105	70-130	4.8	20.0
Chromium	mg/L	< 0.0050	1.00	1.00	0.999	1.04	100	104	70-130	4.0	20.0
Cobalt	mg/L	< 0.0100	1.00	1.00	0.998	1.05	100	105	70-130	5.0	20.0
Copper	mg/L	< 0.0050	1.00	1.00	1.00	1.05	100	105	70-130	4.8	20.0
Iron	mg/L	< 0.100	10.0	10.0	10.0	10.5	100	105	70-130	4.8	20.0
Lead	mg/L	< 0.0060	0.100	0.100	0.101	0.106	101	106	70-130	4.8	20.0
Magnesium	mg/L	8.84	10.0	10.0	18.2	19.3	94.0	105	70-130	5.8	20.0
Manganese	mg/L	0.0102	1.00	1.00	0.973	1.01	96.0	100	70-130	3.7	20.0
Molybdenum	mg/L	< 0.0050	1.00	1.00	1.05	1.06	105	106	70-130	0.9	20.0
Nickel	mg/L	< 0.0050	1.00	1.00	1.02	1.07	102	107	70-130	4.7	20.0
Selenium	mg/L	< 0.0100	0.100	0.100	0.0995	0.102	100	102	70-130	2.4	20.0
Silver	mg/L	< 0.0050	0.100	0.100	0.104	0.104	104	104	70-130	0.0	20.0
Tin	mg/L	< 0.0500	1.00	1.00	1.03	1.03	103	103	70-130	0.0	20.0
Titanium	mg/L	< 0.0100	1.00	1.00	1.01	1.01	101	101	70-130	0.0	20.0
Thallium	mg/L	< 0.0200	0.100	0.100	0.0981	0.103	98.0	103	70-130	4.8	20.0
Zinc	mg/L	0.0683	1.00	1.00	1.08	1.13	101	106	70-130	4.5	20.0

Date: 10/30/2023 03:18 PM

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### **Quality Control Data**

Client ID:

Southern Environmental Engineering

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L712399

QC Prep Batch Method: 245.1

QC Analytical Batch(es):

L712618

**Analysis Method:** 

EPA-245.1

**Analysis Description:** 

Mercury

Lab Reagent Blank

LRB-L712399

Matrix: AQU

Associated Lab Samples: 90231

**Parameter** 

Units

**Blank** Result MQL

**Analyzed** 

Mercury

mg/L < 0.00020

0.00020

10/23/23 13:35

**Laboratory Control Sample** 

LCS-L712399

**Parameter** 

Units

Spike Conc. LCS

LCS %Rec

% Rec Limits

Mercury

mg/L 0.00400 Result 0.00355

89.0

85-115

Matrix Spike & Matrix Spike Duplicate

L 90236-MS-L712399

L 90236-MSD-L712399

**Parameter** 

Units Result **MS Spike** Conc.

MSD Spike Conc.

MSD **MS Result** Result

MS %Rec

MSD %Rec %Rec Limits RPD

**RPD** 

Max

20.0

Mercury

mg/L < 0.000200.00400 0.00400

0.00310 0.00302 78.0

76.0

70-130 2.6

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#### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0097

QC Prep:

L713782

QC Prep Batch Method: EPA-300.0 (PREP)

QC Analytical Batch(es): L713895

**Analysis Method:** 

EPA-300.0

**Analysis Description:** 

Anions by Ion Chromatography

**Lab Reagent Blank** 

LRB-L713782

Matrix: AQU

Associated Lab Samples: 90231

**Parameter** 

Units

**Blank** Result

< 0.100

MQL

Bromide

mg/L

0.100

10/27/23 07:59

**Analyzed** 

**Laboratory Control Sample & LCSD** 

LCS-L713782 LCSD-L713782

Units **Parameter** 

Spike Conc.

LCS Result

LCSD Result

LCS LCSD %Rec % Rec

% Rec Limits

RPD Max **RPD** 

**Bromide** 

mg/L 12.5

Units

13.2

12.6

106

101 90-110 4.6 20.0

Matrix Spike & Matrix Spike Duplicate

Q 93832-MS-L713782

**MS Spike** 

Q 93832-MSD-L713782

**MS Result** 

**Parameter** 

Result **Bromide** mg/L < 0.105

Conc. 6.58

Conc. 6.58

MSD

Spike

6.33

6.48

MSD

Result

96.0

MS

%Rec

98.0

MSD

%Rec

2.3 80-120

%Rec

Limits RPD

20.0

Max

RPD

Date: 10/30/2023 03:18 PM

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		Shipment	Receipt F	orm		
Customer Number	r: 23184					
Customer Name: Report Number:	Southern Enviror 23-292-0097	mental Eng	jineering			
		Shippin	ng Method			
○ Fed Ex	○ US Postal	◯ Lab		Other:		
UPS	Client	Couri	er	Thermometer ID:	T135	
Shipping container	cooler uncompromis	sed?	Yes	○ No		
Number of coolers	/boxes received		1			
Custody seals intac	ct on shipping contai	ner/cooler?	Yes	○ No	O Not Prese	nt
Custody seals intac	ct on sample bottles	?	○ Yes	○ No	Not Prese	ent
Chain of Custody (	COC) present?		Yes	○ No		
COC agrees with s	ample label(s)?		Yes	○ No		
COC properly com	pleted		Yes	○ No		
Samples in proper	containers?		Yes	○ No		
Sample containers	intact?		Yes	○ No		
Sufficient sample v	olume for indicated	test(s)?	Yes	○ No		
All samples receive	ed within holding time	e?	Yes	○ No		
Cooler temperature	e in compliance?		Yes	○ No		
	rived at the laborato sidered acceptable and.		Yes	○ No		
Water - Sample co	ntainers properly pre	eserved	Yes	○ No	○ N/A	
Water - VOA vials	free of headspace		Yes	○ No	○ N/A	
Trip Blanks receive	ed with VOAs		○ Yes	No	○ N/A	
Soil VOA method 5	035 – compliance c	riteria met	○ Yes	○ No	● N/A	
High concentra	tion container (48 hr	)	Lov	w concentration EnC	ore samplers (48 h	ır)
High concentrate	tion pre-weighed (me	ethanol -14 c	d) Lov	w conc pre-weighed	vials (Sod Bis -14 d	d)
Special precaution	s or instructions incli	uded?	○ Yes	<ul><li>No</li></ul>		
Comments:						

Date & Time: 10/19/2023 12:57:29 Signature: Carleen Qualls

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10/26/2023

Southern Environmental Engineering Mr. Eric Curtis 1222 Helton Drive Florence, AL, 35630

Ref: Analytical Testing

Lab Report Number: 23-293-0129

Client Project Description: EPA Form 2C

Dear Mr. Eric Curtis:

Waypoint Analytical, LLC. received sample(s) on 10/20/2023 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 asreceived 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,

Andrea R Brownfield Project manager

ladren Broughle

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.





# **Certification Summary**

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

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2024
Florida	State Program - NELAP	E871157	06/30/2024
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2024
Illinois	State Program - NELAP	200078	10/31/2024
Kentucky	State Program	80215	06/30/2024
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2024
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2024
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2024
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2024
Virginia	State Program	00106	06/30/2024
Virginia	State Program - NELAP	460181	09/14/2024



#### **Sample Summary Table**

**Report Number:** 

23-293-0129

**Client Project Description:** 

**EPA Form 2C** 

Lab No	Client Sample ID	Matrix	Date Collected	Date Received	
91186	DSN0011 (Grab)	Aqueous	10/19/2023 13:08	10/20/2023	



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence , AL 35630 Project

EPA Form 2C

Information:

Report Date: 10/26/2023

Received: 10/20/2023

Andrea R. Brownfield Project manager

REPORT OF ANALYSIS

Lab No: 91186

Sample ID : DSN0011 (Grab)

Report Number: 23-293-0129

Matrix: Aqueous

Sampled: 10/19/2023 13:08

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Phenols (Total)	<0.0050	mg/L	0.0050	1	10/25/23 10:00	CLP	420.1



### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

**EPA Form 2C** 

Report No:

23-293-0129

QC Analytical Batch:

L713067

**Analysis Method:** 

420.1

**Analysis Description:** 

**Total Recoverable Phenolics** 

Units

**Lab Reagent Blank** 

LRB

Matrix: AQU

Associated Lab Samples: 91186

**Parameter** 

**Blank** Result MQL

**Analyzed** 

Phenols (Total)

mg/L < 0.0050

0.0050

10/25/23 10:00

**Laboratory Control Sample** 

LCS

**Parameter** 

Units

**Spike** Conc.

LCS Result LCS %Rec

% Rec Limits

Phenols (Total)

0.0240 mg/L

0.0253

105

90-110

**Duplicate** 

L 88554-DUP

**Parameter** 

Result

DUP **RPD**  Max RPD

**Analyzed** 

Phenols (Total)

Units Result mg/L < 0.0066 < 0.0066

0.0

30.00

10/25/23 10:00

**Matrix Spike** 

L 96512-MS

**Parameter** 

Units

Result

**MS Spike** Conc.

MSD **MS Result Spike** Conc.

MSD Result

MS %Rec

%Rec Limits

Max RPD

Phenols (Total)

mg/L < 0.0062

0.0450

0.0349

78.0

61-120

Date: 10/26/2023 07:59 AM

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#### **Shipment Receipt Form**

Customer Name: Report Number:	Southern Enviro 23-293-0129	nmental Eng	ineering		
Report Number.	20-230-0123	Shippin	g Method		
○ Fed Ex ○ UPS	US Postal Client	○ Lab		Other : Thermometer ID:	T100
Shipping container	cooler uncomprom	ised?	Yes	○ No	
Number of coolers	boxes received		1		
Custody seals intac	et on shipping conta	iner/cooler?	Yes	○ No	O Not Present
Custody seals intac	t on sample bottles	?	○ Yes	○ No	Not Present
Chain of Custody (	COC) present?		Yes	○ No	
COC agrees with s	ample label(s)?		Yes	○ No	
COC properly com	pleted		Yes	○ No	
Samples in proper	containers?		Yes	○ No	
Sample containers	intact?		Yes	○ No	
Sufficient sample v	olume for indicated	test(s)?	Yes	○ No	
All samples receive	ed within holding tim	ne?	Yes	○ No	
Cooler temperature	in compliance?		Yes	○ No	
Cooler/Samples are Samples were cons process had begun	sidered acceptable		Yes	○ No	
Water - Sample co	ntainers properly pr	eserved	Yes	○ No	○ N/A
Water - VOA vials f	ree of headspace		○ Yes	○ No	● N/A
Trip Blanks receive	d with VOAs		○ Yes	○ No	● N/A
Soil VOA method 5	035 – compliance o	criteria met	○ Yes	○ No	● N/A
High concentrat	tion container (48 h	r)	Lov	v concentration EnC	Fore samplers (48 hr)
High concentrat	ion pre-weighed (m	ethanol -14 d	) Lov	v conc pre-weighed	vials (Sod Bis -14 d)
Special precautions	s or instructions inc	luded?	○ Yes	● No	
Comments:					

Page 6 of 7

Signature: Carleen Qualls

Date & Time: 10/20/2023 15:44:04

SEE PO Box	ame/Addr x 3241 xe, AL 35		Client Project Manager/Control Eric Curtis (256) 443-8306 ecurtis@see-env.com	act		Sar	g Information		For Laboratory Use Only				
Project I Robbins Permit R 2C Table	Renewal		Project/Site Location (City/St Muscle Shoals, AL			5	RUSH – Addition Special Detectio Date Results Ne		Method of Shipment  ☐ Fed Ex ☐ Courier ☐ Client Drop Off  Other  Matrix Key  WW — Wastewater GW — C  DW — Drinking Water S — Soi  P - Product M - Misc				
Project i	Number		Project Manager Phone #			Proje	ct Manager Em	all .	Purchase Order N	lumber	Site/Facility ID #		
			(256) 443-83	306	3	ecu	urtis@se	e-env.com					
Memph	Vhitten Rehis, TN 381		Unless noted, all containers per Table II of 40 CFR Part 136.	Number of Containers	Matrix (Refer to Key)	(G)rab or (C)omposite	Total Phenois				A Cool < 10C Na252O3 (M B Cool <= 6C C H2SO4 pH<2 D None Required E NaOH pH>10 F HNO3 pH<2 G HCL pH<2 H H3PO4 pH<2 I Cool <= 6C NA252O3		
Date	Time		ple Identification		Σ			Required An	alysis / Preservative		Comments	/Notes	
0/19/23	1308	DSN0011 (0	Grab)	2	ww	G	1						
			Custody Sea Received on Cooler(s)/Contain		(s)			200	athern Environmental Form 2C	Engineering	23-293-0129 23184 10-20-2023 15:42:42		
		For Laboratory i	Jse Only	Sam	pled by	(Name	- Print)		Client Remarks/C	omments			
Ice		stody	Lab Comments				Reed						
y)/N		) N		-	-	~	GIGNATURE)		Date Time  /O/A/25 14/5  Date Time	Received by: (SIGNAT		Date Time	
Vac	9:4	4		Relin	nguishe	d by: {S	IGNATURE)		Date Time	Received by: (SIGNAT	URE)	Date   Time   10   10   13   1	



11/6/2023

Southern Environmental Engineering Mr. Eric Curtis 1222 Helton Drive Florence, AL, 35630

Ref: Analytical Testing

Lab Report Number: 23-292-0098 Client Project Description: Robbins, LLC

Permit Renewal 2C Table C

Dear Mr. Eric Curtis:

Waypoint Analytical, LLC. received sample(s) on 10/19/2023 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 asreceived 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,

Andrea R Brownfield Project manager

hdrew Broughle

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.





# **Certification Summary**

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

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2024
Florida	State Program - NELAP	E871157	06/30/2024
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2024
Illinois	State Program - NELAP	200078	10/31/2024
Kentucky	State Program	80215	06/30/2024
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2024
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2024
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2024
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2024
Virginia	State Program	00106	06/30/2024
Virginia	State Program - NELAP	460181	09/14/2024



#### **Sample Summary Table**

**Report Number:** 

23-292-0098

**Client Project Description:** 

Robbins, LLC Permit Renewal 2C Table C

Lab No	Client Sample ID	Matrix	<b>Date Collected</b>	Date Received	
90236	DSN0011 Composite	Aqueous	10/18/2023 09:40	10/19/2023	
90237	DSN0011 Grab	Aqueous	10/18/2023 10:00	10/19/2023	



Client: Southern Environmental Engineering

Project: Robbins, LLC

Lab Report Number: 23-292-0098

Date: 11/6/2023

CASE NARRATIVE

#### Block Digestion and FIA Method 4500NORGD-2011

Analyte: Total Kjeldahl Nitrogen QC Batch No: L715033/L714879

Relative Percent Difference (RPD) for the duplicate analysis was outside of the allowable QC limits.



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence , AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table C

Report Date: 11/06/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

Report Number : 23-292-0098

REPORT OF ANALYSIS

Lab No:

90236

Sample ID : DSN0011 Composite

Matrix: Aqueous

Sampled: 10/18/2023 9:40

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
pH (Color)	8.0	s.u.		1	10/20/23 08:10	ABB	2120B-2011
Bromide	<0.100	mg/L	0.100	1	10/24/23 12:06	HMQ	EPA-300.0
Fluoride	0.159	mg/L	0.125	1	10/24/23 12:06	HMQ	EPA-300.0
Nitrate+Nitrite-N	2.32	mg/L	0.100	1	10/26/23 17:30	CLP	4500NO3F-2016
Organic N	< 0.500	mg/L	0.500	1	10/30/23 16:23		CALCULATION
Phosphorus	< 0.500	mg/L	0.500	1	11/03/23 15:10	ANH	365.4
Sulfate	5.70	mg/L	1.00	1	10/24/23 12:06	HMQ	EPA-300.0
Sulfide	<0.5	mg/L	0.5	1	10/23/23 09:32	ANV	4500S2F-2011
Surfactants (MBAS, calculated as LAS, mol wt 342)	<0.200	mg/L	0.200	1	10/20/23 08:14	ANV	5540C-2011
Aluminum	<0.100	mg/L	0.100	1	10/20/23 18:50	BKN	EPA-200.7
Barium	0.0443	mg/L	0.0100	1	10/20/23 18:50	BKN	EPA-200.7
Boron	< 0.0500	mg/L	0.0500	1	10/20/23 18:50	BKN	EPA-200.7
Cobalt	< 0.0100	mg/L	0.0100	1	10/20/23 18:50	BKN	EPA-200.7
Iron	<0.100	mg/L	0.100	1	10/20/23 18:50	BKN	EPA-200.7
Magnesium	3.55	mg/L	0.100	1	10/20/23 18:50	BKN	EPA-200.7
Molybdenum	< 0.0050	mg/L	0.0050	1	10/20/23 18:50	BKN	EPA-200.7
Manganese	< 0.0100	mg/L	0.0100	1	10/20/23 18:50	BKN	EPA-200.7
Tin	< 0.0500	mg/L	0.0500	1	10/20/23 18:50	BKN	EPA-200.7
Titanium	< 0.0100	mg/L	0.0100	1	10/20/23 18:50	BKN	EPA-200.7
Antimony	< 0.0100	mg/L	0.0100	1	10/20/23 18:50	BKN	EPA-200.7
Arsenic	<0.0100	mg/L	0.0100	1	10/20/23 18:50	BKN	EPA-200.7
Beryllium	< 0.0010	mg/L	0.0010	1	10/20/23 18:50	BKN	EPA-200.7

Qualifiers/ Definitions DF

Dilution Factor

MQL

Method Quantitation Limit



23184

Southern Environmental Engineering

Mr. Eric Curtis

Project

Robbins, LLC

1222 Helton Drive Florence, AL 35630 Information: Permit Renewal

2C Table C

REPORT OF ANALYSIS

Report Date: 11/06/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

Matrix: Aqueous

Sampled: 10/18/2023 9:40

Report Number: 23-292-0098

Lab No: 90236

Sample ID: DSN0011 Composite

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Cadmium	<0.0020	mg/L	0.0020	1	10/20/23 18:50	BKN	EPA-200.7
Chromium	<0.0050	mg/L	0.0050	1	10/20/23 18:50	BKN	EPA-200.7
Copper	<0.0050	mg/L	0.0050	1	10/20/23 18:50	BKN	EPA-200.7
Lead	<0.0060	mg/L	0.0060	1	10/20/23 18:50	BKN	EPA-200.7
Mercury	< 0.00020	mg/L	0.00020	1	10/23/23 14:05	FDS	EPA-245.1
Nickel	< 0.0050	mg/L	0.0050	1	10/20/23 18:50	BKN	EPA-200.7
Selenium	<0.0100	mg/L	0.0100	1	10/20/23 18:50	BKN	EPA-200.7
Silver	<0.0050	mg/L	0.0050	1	10/20/23 18:50	BKN	EPA-200.7
Thallium	<0.0200	mg/L	0.0200	1	10/20/23 18:50	BKN	EPA-200.7
Zinc	<0.0200	mg/L	0.0200	1	10/20/23 18:50	BKN	EPA-200.7
Total Kjeldahl Nitrogen	<0.500	mg/L	0.500	1	11/03/23 15:59	ANH	4500NORGD-2011
Ammonia Nitrogen	<0.100	mg/L	0.100	1	10/30/23 16:23	JFM	4500NH3D-2011
Color	5	Pt-Co	5	1	10/20/23 08:10	ABB	2120B-2011



23184

Lab No:

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robbins, LLC

Information: Permit Renewal

2C Table C

Report Date: 11/06/2023

Received: 10/19/2023

Andrea R. Brownfield Project manager

Report Number: 23-292-0098

90237 Sample ID: DSN0011 Grab REPORT OF ANALYSIS

Matrix: Aqueous

Sampled: 10/18/2023 10:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
HEM: Oil and Grease	<1.8	mg/L	1.8	1	10/26/23 09:20	MCW	1664B



#### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Analytical Batch:

L713298

Analysis Method:

1664B

**Analysis Description:** 

Oil and Grease

Lab Reagent Blank

LRB

Matrix: AQU

Associated Lab Samples: 90237

**Parameter** 

Blank Units Result MQL

**Analyzed** 

HEM: Oil and Grease

mg/L < 1.4

1.4

10/26/23 09:20

Qualifie

**Ongoing Precision and Recovery** 

**OPR** 

Parameter	Units	Spike Conc.	OPR Result	% Recovery	Analyzed	%Rec Limits
HEM: Oil and Grease	mg/L	40.0	37.3	93.0	10/26/23 09:20	78-114

**Matrix Spike** 

L 90237-MS

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	%Rec Limits	Max RPD
HEM: Oil and Grease	mg/L	< 1.6	46.5		39.6		85.0	78-114	

Date: 11/06/2023 11:15 AM

Page 1 of 13



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Analytical Batch:

L712485

Analysis Method:

2120B-2011

Analysis Description:

Color (True)

**Laboratory Control Sample** 

LCS

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Color	Pt-Co	50	50	100	90-110	

Date: 11/06/2023 11:15 AM

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### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Prep:

L714879

QC Analytical Batch(es):

L715031,L715033

QC Prep Batch Method: TKN/TKP Digestion

**Analysis Method:** 

365.4

**Analysis Description:** 

Total Phosphorus

Lab Reagent Blank

LRB-L714879

Associated Lab Samples: 90236

Matrix: AQU

Blank MQL **Analyzed** Units **Parameter** Result

Phosphorus

< 0.500 mg/L

0.500

11/03/23 15:04

**Laboratory Control Sample** 

LCS-L714879

% Rec LCS %Rec Spike LCS Units **Parameter** Conc. Result Limits Phosphorus mg/L 2.00 1.98 99.0 80-120

**Duplicate** 

L 91705-DUP-L714879

Parameter	Units	Result	DUP Result	RPD	Max RPD	Analyzed
Phosphorus	mg/L	1.68	1.73	2.9	20.0	11/03/23 15:08

**Matrix Spike** 

L 91705-MS-L714879

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	%Rec Limits	Max RPD
Phosphorus	mg/L	1.68	2.00		3.57	<u> </u>	95.0	70-130	

Date: 11/06/2023 11:15 AM

Page 10 of 22



#### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Analytical Batch:

L713986

Analysis Method:

4500NH3D-2011

**Analysis Description:** 

Ammonia Nitrogen (ISE)

Units

Units

Units

Lab Reagent Blank

LRB

Matrix: AQU

Lab Reagent Blank

Associated Lab Samples: 90236

Parameter

Blank Result MQL

Analyzed

Ammonia Nitrogen

mg/L < 0.100

0.100

10/30/23 16:23

**Laboratory Control Sample** 

LCS

Parameter

Spike Conc. LCS Result LCS %Rec

% Rec Limits

Ammonia Nitrogen

F 00

Result

- 40

. .

-

mg/L 5.00

5.10

MSD

Spike

Conc.

102

90-110

Matrix Spike & Matrix Spike Duplicate

L 92052-MS

L 92052-MSD

Parameter

Ammonia Nitrogen

mg/L < 0.102

2.04

**MS Spike** 

Conc.

2.04

**MS Result** 

2.00

Result

MSD

%Rec 98.0

MS

103

MSD

%Rec

Limits RPD RPD

%Rec

70-130

4.8 20.0

Max

Date: 11/06/2023 11:15 AM

Page 4 of 13



#### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Prep:

L713348

QC Analytical Batch(es): L713393

QC Prep Batch Method: SM-4500-NO3F (PREP)

**Analysis Method:** 

4500NO3F-2016

**Analysis Description:** 

Nitrate + Nitrite Nitrogen

Lab Reagent Blank

LRB-L713348

Matrix: AQU

Associated Lab Samples: 90236

**Parameter** 

**Blank** Result MQL

**Analyzed** 

Nitrate+Nitrite-N

Units < 0.100

0.100

10/26/23 17:24

**Laboratory Control Sample** 

LCS-L713348

**Parameter** 

Spike Units Conc.

Units

mg/L

LCS Result LCS %Rec

% Rec Limits

Nitrate+Nitrite-N

mg/L 5.00 5.14

103

90-110

MSD

%Rec

Matrix Spike & Matrix Spike Duplicate

L 91716-MS-L713348

L 91716-MSD-L713348

**MS Result** 

**Parameter** 

Result Nitrate+Nitrite-N mg/L 0.404

1.00

**MS Spike** 

Conc.

Conc. 1.00

MSD

Spike

1.39 1.36

MSD

Result

99.0 96.0

MS

%Rec

Limits RPD 70-130 2.1 Max

RPD

20.0

%Rec

Date: 11/06/2023 11:15 AM

Page 12 of 22

Page 5 of 13



#### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Prep:

L714879

QC Prep Batch Method: TKN/TKP Digestion

QC Analytical Batch(es): L715031,L715033

**Analysis Method:** 

4500NORGD-2011

**Analysis Description:** 

Block Digestion and FIA

**Lab Reagent Blank** 

LRB-L714879

Matrix: AQU

Associated Lab Samples: 90236

**Parameter** 

Units

**Blank** Result MQL

Total Kjeldahl Nitrogen

< 0.500 mg/L

0.500

11/03/23 15:36

**Analyzed** 

**Laboratory Control Sample** 

LCS-L714879

**Parameter** 

Units

Spike Conc.

LCS Result LCS %Rec

% Rec Limits

Total Kjeldahl Nitrogen

mg/L 10.0 9.95

100

90-110

**Duplicate** 

**Parameter** 

L 91705-DUP-L714879

Result

**RPD** Result

Max RPD

**Analyzed** 

Total Kjeldahl Nitrogen

mg/L 0.910

Units

Units

0.728

DUP

22.2\*

MSD

20.0

11/03/23 15:57

**Matrix Spike** 

L 91705-MS-L714879

**Parameter** Total Kjeldahl Nitrogen

mg/L

**MS Spike** 

Conc.

Spike Conc.

**MS Result** MSD Result

MS %Rec %Rec Limits Max **RPD** 

0.910

Result

10.0

10.3

94.0

70-130

\* OC Fail

Date: 11/06/2023 11:15 AM

Page 13 of 22



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Analytical Batch:

L712496

Analysis Method:

4500S2F-2011

**Analysis Description:** 

Lab Reagent Blank

LRB

Matrix: AQU

Associated Lab Samples: 90236

**Blank** 

< 0.5

MQL

**Analyzed** 

**Parameter** 

Sulfide

Units Result

mg/L

0.5

10/23/23 09:32

**Laboratory Control Sample & LCSD** 

LCS LCSD

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS %Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD
Sulfide	mg/L	26.8	21.6	19.2	81.0	72.0	70-130	11.7	20.0

Date: 11/06/2023 11:15 AM

Page 14 of 22



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Analytical Batch:

L712509

**Analysis Method:** 

5540C-2011

Analysis Description:

Methylene Blue Activated Surfactants

Units

Lab Reagent Blank

**Parameter** 

LRB

Matrix: AQU

and it did not a second

Associated Lab Samples: 90236

Blank

MQL

**Analyzed** 

Surfactants (MBAS, calculated as LAS, r mg/L

< 0.200

0.200

10/20/23 08:14

**Laboratory Control Sample** 

LCS

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	.,
Surfactants (MBAS, calculated as LAS, r	mg/L	1.20	1.18	98.0	90-110	

Matrix Spike & Matrix Spike Duplicate

L 90236-MS L 90236-MSD

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD	_
Surfactants (MBAS, calculated as LAS,	r mg/L	< 0.202	0.606	0.606	0.457	0.532	75.0	88.0	70-130	15.1	20.0	

Date: 11/06/2023 11:15 AM

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

LRB-L711991

**Project Description:** 

Robbins, LLC

**Report No:** 

23-292-0098

QC Prep:

L711991

QC Prep Batch Method: EPA-200.7 (PREP)

QC Analytical Batch(es):

L712226

**Analysis Method:** 

EPA-200.7

**Analysis Description:** 

Total Metals

**Lab Reagent Blank** 

Associated Lab Samples: 90236

Matrix: AQU

Parameter	Units	Blank Result	MQL	Analyzed	
Aluminum	mg/L	< 0.100	0.100	10/20/23 11:01	
Antimony	mg/L	< 0.0100	0.0100	10/20/23 11:01	
Arsenic	mg/L	< 0.0100	0.0100	10/20/23 11:01	
Barium	mg/L	< 0.0100	0.0100	10/20/23 11:01	
Beryllium	mg/L	< 0.0010	0.0010	10/20/23 11:01	
Boron	mg/L	< 0.0500	0.0500	10/20/23 11:01	
Cadmium	mg/L	< 0.0020	0.0020	10/20/23 11:01	
Chromium	mg/L	< 0.0050	0.0050	10/20/23 11:01	
Cobalt	mg/L	< 0.0100	0.0100	10/20/23 11:01	
Copper	mg/L	< 0.0050	0.0050	10/20/23 11:01	
Iron	mg/L	< 0.100	0.100	10/20/23 11:01	
Lead	mg/L	< 0.0060	0.0060	10/20/23 11:01	
Magnesium	mg/L	< 0.100	0.100	10/20/23 11:01	
Manganese	mg/L	< 0.0100	0.0100	10/20/23 11:01	
Molybdenum	mg/L	< 0.0050	0.0050	10/20/23 11:01	
Nickel	mg/L	< 0.0050	0.0050	10/20/23 11:01	
Selenium	mg/L	< 0.0100	0.0100	10/20/23 11:01	
Silver	mg/L	< 0.0050	0.0050	10/20/23 11:01	
Tin	mg/L	< 0.0500	0.0500	10/20/23 11:01	
Titanium	mg/L	< 0.0100	0.0100	10/20/23 11:01	
Thallium	mg/L	< 0.0200	0.0200	10/20/23 11:01	
Zinc	mg/L	< 0.0200	0.0200	10/20/23 11:01	

**Laboratory Control Sample** 

LCS-L711991

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Aluminum	mg/L	10.0	9.74	97.0	85-115	

Date: 11/06/2023 11:15 AM

Page 9 of 13



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Prep:

L711991

QC Prep Batch Method: EPA-200.7 (PREP)

QC Analytical Batch(es): L712226

**Analysis Method:** 

EPA-200.7

**Analysis Description:** 

Total Metals

**Laboratory Control Sample** 

LCS-L711991

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Antimony	mg/L	0.100	0.0901	90.0	85-115	
Arsenic	mg/L	0.100	0.0976	98.0	85-115	
Barium	mg/L	1.00	0.986	99.0	85-115	
Beryllium	mg/L	0.100	0.0991	99.0	85-115	
Boron	mg/L	1.00	0.965	97.0	85-115	
Cadmium	mg/L	0.100	0.100	100	85-115	
Chromium	mg/L	1.00	1.02	102	85-115	
Cobalt	mg/L	1.00	1.01	101	85-115	
Copper	mg/L	1.00	0.996	100	85-115	
ron	mg/L	10.0	9.94	99.0	85-115	
_ead	mg/L	0.100	0.101	101	85-115	
Magnesium	mg/L	10.0	9.62	96.0	85-115	
Manganese	mg/L	1.00	1.00	100	85-115	
Molybdenum	mg/L	1.00	0.969	97.0	85-115	
Nickel	mg/L	1.00	1.02	102	85-115	
Selenium	mg/L	0.100	0.0947	95.0	85-115	
Silver	mg/L	0.100	0.0961	96.0	85-115	
Гin	mg/L	1.00	0.974	97.0	85-115	
Fitanium	mg/L	1.00	0.966	97.0	85-115	
Thallium	mg/L	0.100	0.100	100	85-115	
Zinc	mg/L	1.00	1.03	103	85-115	

Matrix Spike & Matrix Spike Duplicate

Q 93129-MS-L711991

Q 93129-MSD-L711991

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Aluminum	mg/L	0.140	10.0	10.0	9.86	10.3	97.0	102	70-130	4.3	20.0

Date: 11/06/2023 11:15 AM

Page 10 of 13



# **Quality Control Data**

**Client ID:** 

Southern Environmental Engineering

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Prep:

L711991

QC Prep Batch Method: EPA-200.7 (PREP)

QC Analytical Batch(es): L712226

**Analysis Method:** 

EPA-200.7

**Analysis Description:** 

Total Metals

Matrix Spike & Matrix Spike Duplicate

Q 93129-MS-L711991

Q 93129-MSD-L711991

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Antimony	mg/L	< 0.0100	0.100	0.100	0.102	0.103	102	103	70-130	0.9	20.0
Arsenic	mg/L	< 0.0100	0.100	0.100	0.0989	0.104	99.0	104	70-130	5.0	20.0
Barium	mg/L	< 0.0100	1.00	1.00	0.994	1.05	99.0	105	70-130	5.4	20.0
Beryllium	mg/L	< 0.0010	0.100	0.100	0.0978	0.102	98.0	102	70-130	4.2	20.0
Boron	mg/L	0.415	1.00	1.00	1.46	1.49	105	108	70-130	2.0	20.0
Cadmium	mg/L	< 0.0020	0.100	0.100	0.100	0.105	100	105	70-130	4.8	20.0
Chromium	mg/L	< 0.0050	1.00	1.00	0.999	1.04	100	104	70-130	4.0	20.0
Cobalt	mg/L	< 0.0100	1.00	1.00	0.998	1.05	100	105	70-130	5.0	20.0
Copper	mg/L	< 0.0050	1.00	1.00	1.00	1.05	100	105	70-130	4.8	20.0
Iron	mg/L	< 0.100	10.0	10.0	10.0	10.5	100	105	70-130	4.8	20.0
Lead	mg/L	< 0.0060	0.100	0.100	0.101	0.106	101	106	70-130	4.8	20.0
Magnesium	mg/L	8.84	10.0	10.0	18.2	19.3	94.0	105	70-130	5.8	20.0
Manganese	mg/L	0.0102	1.00	1.00	0.973	1.01	96.0	100	70-130	3.7	20.0
Molybdenum	mg/L	< 0.0050	1.00	1.00	1.05	1.06	105	106	70-130	0.9	20.0
Nickel	mg/L	< 0.0050	1.00	1.00	1.02	1.07	102	107	70-130	4.7	20.0
Selenium	mg/L	< 0.0100	0.100	0.100	0.0995	0.102	100	102	70-130	2.4	20.0
Silver	mg/L	< 0.0050	0.100	0.100	0.104	0.104	104	104	70-130	0.0	20.0
Tin	mg/L	< 0.0500	1.00	1.00	1.03	1.03	103	103	70-130	0.0	20.0
Titanium	mg/L	< 0.0100	1.00	1.00	1.01	1.01	101	101	70-130	0.0	20.0
Thallium	mg/L	< 0.0200	0.100	0.100	0.0981	0.103	98.0	103	70-130	4.8	20.0
Zinc	mg/L	0.0683	1.00	1.00	1.08	1.13	101	106	70-130	4.5	20.0

Date: 11/06/2023 11:15 AM

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Prep:

L712399

QC Analytical Batch(es): L712618

QC Prep Batch Method: 245.1

**Analysis Method:** 

EPA-245.1

**Analysis Description:** 

Mercury

Lab Reagent Blank

LRB-L712399

Matrix: AQU

Associated Lab Samples: 90236

**Blank** 

MQL

**Parameter** 

Units Result

**Analyzed** 

Mercury

mg/L < 0.00020

0.00020

10/23/23 13:35

**Laboratory Control Sample** 

LCS-L712399

**Parameter** 

Spike Units Conc.

LCS Result

LCS %Rec

% Rec Limits

Mercury

0.00400 mg/L

Units

0.00355

89.0

MSD

Result

85-115

Matrix Spike & Matrix Spike Duplicate

L 90236-MS-L712399

MS Spike

Conc.

L 90236-MSD-L712399

**MS Result** 

**Parameter** 

Result

Conc.

MSD

Spike

0.00302

%Rec 78.0

MS

%Rec

MSD

Limits RPD **RPD** 

Max

Mercury

mg/L < 0.000200.00400 0.00400

0.00310

76.0

70-130

%Rec

2.6 20.0

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#### **Quality Control Data**

**Client ID:** 

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-292-0098

QC Prep:

L712955

QC Prep Batch Method: EPA-300.0 (PREP)

QC Analytical Batch(es): L713427

**Analysis Method:** 

EPA-300.0

**Analysis Description:** 

Anions by Ion Chromatography

Lab Reagent Blank

Associated Lab Samples: 90236

LRB-L712955

Matrix: AQU

Blank MQL **Analyzed Parameter** Units Result

**Bromide** mg/L < 0.100 0.100 10/24/23 08:00 Fluoride (w/o distillation) 10/24/23 08:00 mg/L < 0.125 0.125

Sulfate mg/L < 1.00 1.00 10/24/23 08:00

**Laboratory Control Sample & LCSD** 

LCS-L712955 LCSD-L712955

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS %Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD
Bromide	mg/L	12.5	12.1	12.0	97.0	96.0	90-110	0.8	20.0
Fluoride (w/o distillation)	mg/L	6.25	5.92	5.83	95.0	93.0	90-110	1.5	20.0
Sulfate	mg/L	62.5	60.1	59.4	96.0	95.0	90-110	1.1	20.0

Matrix Spike & Matrix Spike Duplicate

Q 93646-MS-L712955

Q 93646-MSD-L712955

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Bromide	mg/L	< 0.105	6.58	6.58	6.18	6.14	94.0	93.0	80-120	0.6	20.0
Fluoride (w/o distillation)	mg/L	0.342	3.29	3.29	3.38	3.39	92.0	93.0	80-120	0.2	20.0
Sulfate	mg/L	< 1.05	32.9	32.9	31.3	31.1	95.0	95.0	80-120	0.6	20.0

Date: 11/06/2023 11:15 AM

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Customer Number: 23184

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

### **Shipment Receipt Form**

Customer Name: Report Number:	Southern Enviror	nmental Eng	gineering		
rioport Hambor.		Shippir	ng Method	I	
○ Fed Ex	US Postal	<ul><li>○ Lab</li><li>⑥ Cour</li></ul>	ier	Other : Thermometer ID:	T135
Shipping container	/cooler uncompromi	sed?	Yes	○ No	
Number of coolers			1		
	ct on shipping contai	ner/cooler?	Yes	○ No	O Not Present
	ct on sample bottles		○ Yes	○ No	Not Present
Chain of Custody (			Yes	○ No	<u> </u>
COC agrees with s			Yes	○ No	
COC properly com			Yes	○ No	
Samples in proper			Yes	○ No	
Sample containers			<ul><li>Yes</li></ul>	○ No	
Sufficient sample v	olume for indicated	test(s)?	Yes	○ No	
All samples receive	ed within holding time	e?	Yes	○ No	
Cooler temperature	e in compliance?		Yes	○ No	
	rived at the laborato sidered acceptable a n.		Yes	○ No	
Water - Sample co	ntainers properly pre	eserved	Yes	○ No	○ N/A
Water - VOA vials t	free of headspace		○ Yes	○ No	● N/A
Trip Blanks receive	ed with VOAs		O Yes	○ No	● N/A
Soil VOA method 5	035 – compliance c	riteria met	○ Yes	○ No	● N/A
High concentrate	tion container (48 hr	)	Lo	w concentration En	Core samplers (48 hr)
High concentrat	tion pre-weighed (me	ethanol -14 o	d) Lo	w conc pre-weighed	vials (Sod Bis -14 d)
Special precautions	s or instructions incl	uded?	○ Yes	<ul><li>No</li></ul>	
Comments:					
Signature	e: Carleen Qualls		Date	& Time: 10/19/202	23 13:01:23

	Client Name/Address Client Project Manager/Con SEE Eric Curtis					-	g Inform	ation				For Laboratory Use Only				ıly
PO Bo	x 3241 ce, AL 35	6630	(256) 443-8306 ecurtis@see-env.com			Sar	ne									
Project Robbins Permit F 2C Table	Renewal	1	Project/Site Location (City/St Muscle Shoals, AL	Special Detection Limit(s)				Method of Shipment Fed Ex UPS USPS Courier Client Drop Off Other  Matrix Key WW - Wastewater GW - G DW - Drinking Water S - Soil P - Product M - Misc				er S - Soil /Solid O - Oil				
Project	Number		Project Manager Phone #					ger Email			Purcha	sse Order Number Site/Facility ID #				
			(256) 443-83	306	)	ecu	urtis(	<u>o</u> see	-env	.com						
2790 N Memp	Whitten Rohis, TN 38		Unless noted, all containers per Table II of 40 CFR Part 136.	Number of Containers	Matrix (Refer to Key)	(G)rab or (C)omposite	Promide, Plumie, Bulline, Sufficiente	Color	Nitraile-Mitrite, TOM, Total P	Sulfide	Metals per List	Oil and Grease			8 Cool <= 6 C H2504 pi D None Ret E NaOH pi F HN03 pi G HCL pi C H42P04 p	H<2 quired  >10  <2  }
Date	Time		ple Identification	_	Σ			-	Re	quired An	alysis / Pr	eservativ			Con	ments/Notes
10/16/23	09:40	DSN0011		1	ww	С	1									
10/18/23	09:40	DSN0011		2	ww	С		1								
10/18/23	09:40	DSN0011		1	ww	С			1							
10/18/23	09:40	DSN0011		1	ww	С				1						
10/18/23	09:40	DSN0011		1	ww	С					1					
10/18/23	1000	DSN0011		2	ww	G						1				
			Custody Seals received on:			h.———							Southern	Environmen	tal Engineering	23-292-0098 23184 10-19-2023 13:01:11
		2.6	oler(s)/Container(s	)									EPA Form	12C		
		For Laboratory L	ise Only	Sam	pled by	(Name	- Print)				Client R	emarks/0	omments			
Ice	1 5	stody ieais	Lab Comments		70	mm	y K.	red			Sul	fite:	e: 0.64 mg/L TRC: 0.01			01
(A) N		DN		Relir	quishe	d by: (9	IGNATUI	REL	/		Date	Time	ne Received by: (SIGNATURE) Date Time			Date Time
Blan	k/Cooler T	'emp'		Relir	quishe	d by: (5	IGNATU	RE)		Date Ti		Received	by: (SIGNA	TURE)	Date Time	
	S.C.			Relia	quishe	d by: (5	IGNATU	RE)			Date Time Received by (SIGNATURE)		TURE) Eal.	Date Time 10/18/23 11:20		

October 26, 2023

Eric Curtis Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630

We appreciate the opportunity to provide our services to you on this project. Please find attached the data for the sample(s) listed below:

Lab ID	Sample Description	Date Collected	Date Submitted
FD02376-01	DSN0011 Grab- Robbins LLC Permit I	10/19/2023	10/19/2023

This cover page and the attached chain-of-custody record(s) are integral parts of your report. Southern Environmental Testing considers this report your official record. This information shall remain in Southern Environmental Testing's active database for a period of one (1) calendar year before archiving. Any replacement of this information after archiving may result in an administrative fee to cover the cost of retrieval.

If you have any questions or would like more information regarding these analyses, please call our Decatur facility at (256) 280-2567 or our Florence facility at (256) 740-5532.

Taylor Terrell

aylor levell

Project Manager

Reviewed by:



#### SAMPLE RESULTS REPORT

Report Date/Time: 10/26/2023 12:59

REPORT TO

Eric Curtis Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630 This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.

Analyre Name	Result	Units	Qualifer	Regulatory Limit

Sample Point: DSN0011 Grab- Robbin

Sample ID: FD02376-01

Collected: 10/19/2023

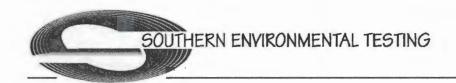
Submitted: 10/19/2023

Microbiological

Fecal Coliform

17300

MPN/100 mL



#### SAMPLE RESULTS REPORT

Report Date/Time: 10/26/2023 12:59

REPORT TO

Eric Curtis Southern Environmental Engineering 1222 Helton Dr Florence, AL 35630 This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.

All calculations are performed prior to rounding per EPA and *Standard Methods* requirements. Calibration data for field analyses conducted by SET or *ENERSOLV* personnel are available upon request.

#### **Data Qualifiers**

< Less than reporting limit

#### **Analysis Information**

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time		Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
FD02376-01	Fecal Coliform	Colilert 18/SM9223B-04	FLY	Florence	10/19/2023	13:08	10/19/2023 13:55	10/20/2023 08:12



# SOUTHERN ENVIRONMENTAL TESTING ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD 2919 FAIRGROUND ROAD SW, DECATUR, AL 35603 3103 NORTHINGTON COURT, FLORENCE, AL 35630

PAGE	1	of	1
Robbins LLC F	ermit	Rene	wal
<b>EPA Form</b>	2C Ta	able C	

				El		ECT NUMBER												
SEE											RE	QUES	TED	AN	ALYS	SES		
CLIENT POINT OF CONTA	CT	CLIENT PHYSICAL	LADDRESS	CI	ITY/STATE/ZIP								П					
Eric Curtis		1222 Helton I		F	lorence, AL	35630												
CLIENT EMAIL		PHONE NUMBER	OTHER INFO	RMATION					_									
ecurtis@see-env.co	<u>om</u>	256-443-8306							E									
AMPLE COLLECTED BY  Tommy Reed			DATE DUE (REC	UIRED)	RY (SURCHARG				Coliform									
SET LAB NUMBER	SA	MPLE DESCRIPTI	ION	SAMPL TRANSFER DATE	GRAB TRAN	SAMPLE SFER/GRAB TIME	GRAB	COMP	Fecal									
FD02376-01	DSN0011	(Grab)		10/19/202	3	308	X		X									
														$\neg$				
															1			
														_	_	+	-	
														-	-	+	-	$\vdash$
													1					
	ector to comp	lete shaded area FIE					Qt	y 1	T	ype - C	Cool 60			он І		Para	amete	ers
COMPOSITE SAMPLER INFO	ector to comp	FIE	LD INFORM		SN	1 2550B	Qt			ype - C			F	ьн			mete	ers
COMPOSITE		FIE SM 4500-CI G TRC	LD INFORM	MATION	SN Temp	1 2550B	Qt			ype - C			Į p	рН			amete CN	ers
COMPOSITE SAMPLER INFO Start Date	SM 4500H- pH su	FIE SM 4500-CI G TRC mg/l	(2011) SN DO mg/l	MATION 1 4500-O G	Temp deg C	1 2550B							I p	рН				ers
COMPOSITE SAMPLER INFO Start Date Start Time	SM 4500H-	FIE SM 4500-CI G TRC	(2011) SN	MATION 1 4500-O G	Temp	1 2550B							F	Н				ers
COMPOSITE SAMPLER INFO Start Date Start Time Stop	SM 4500H- pH su	FIE SM 4500-CI G TRC mg/l	(2011) SN DO mg/l	14500-O G	Temp deg C	1 2550B							_   p	DH				ers
COMPOSITE SAMPLER INFO Start Date Start Time	SM 4500H- pH su Date	FIE SM 4500-CI G TRC mg/I Date	(2011) SN DO mg/l Date	MATION 1 4500-O G	Temp deg C Date	1 2550B							F	DH				ers
COMPOSITE SAMPLER INFO Start Date Start Time Stop Date Stop Time	SM 4500H- pH su Date Time Analyst	FIE  B SM 4500-CI G  TRC mg/I  Date  Time  Analyst	DO mg/l Date Time Analys	MATION 1 4500-O G	Temp deg C Date Time Analyst	1 2550B				mL HD	PE Na				DA			TIME
COMPOSITE SAMPLER INFO Start Date Start Time Stop Date Stop Time RELINQUISHED BY: (SIGNATU	SM 4500H- pH su Date Time Analyst	FIE  B SM 4500-CI G  TRC mg/I  Date  Time  Analyst	DO mg/l Date Time Analys	MATION 1 4500-O G	Temp deg C Date Time Analyst	DATE		TIME		mL HD	PE Na	OH  D BY; (SIG	NATURE			ATE		TIME
COMPOSITE SAMPLER INFO Start Date Start Time Stop Date Stop Time	SM 4500H- pH su Date Time Analyst	FIE  B SM 4500-CI G  TRC mg/I  Date  Time  Analyst	DO mg/l Date Time Analys	MATION 1 4500-O G	Temp deg C Date Time Analyst					mL HD	PE Na	ОН	NATURE					
COMPOSITE SAMPLER INFO Start Date Start Time Stop Date Stop Time RELINQUISHED BY: (SIGNATU	SM 4500H- pH su Date Time Analyst  DAT	FIE B SM 4500-CI G TRC mg/l Date Time Analyst TIME  S/19/23 134 TIME	DO mg/l Date Time Analys	MATION  1 4500-O G  St  ED BY: (SIGNATURE)	Temp deg C Date Time Analyst	DATE		TIME		mL HD	PE Na	OH  D BY; (SIG	NATURE			ATE		TIME

**EPA Identification Number** ALD004002655

NPDES Permit Number AL0069931

Facility Name Robbins, LLC Form Approved 03/05/19 OMB No. 2040-0004

# U.S Environmental Protection Agency

Form 2F NPDES	9	EPA	STORMV	Application f		Permit t	o Discharg	je Wastew		TIVIT	v		
SECTION	1. OUT	FALL LOCA	TION (40 CFR 122.21		INOLO A	DOOOIA	TED WITH	TINDOOT	MAL AG	TIVII	-		
	1.1		ormation on each of th		s in the tab	le below							
		Outfall Number	Receiving Water N	Name	Lati		Longitude						
_		DSN001	UT to Spring Cre	eek 34.00	° 43.00′	39.15"	N	-87. <b>9</b>	40.00′	16.24	" w 🔽		
ocatio					,	"		0	,		*		
Outfall Location					,	"		۰	,		"		
ō					,	"		•	,		,,		
					,	"		0	,		<i>"</i>		
ECTION	LO IMPI	POVEMENTS	(40 CFR 122.21(g)(6										
	2.1	Are you pre upgrading, affect the di	sently required by an or operating wastewa ischarges described in	y federal, state, o ter treatment equ n this application?	ipment or p			er environm	ental prog				
	2.2	Briefly identify each applicable project in the table below.											
			dentification and	Affected Out		Source	e(s) of Disc	harge	Compl	ance Dates			
		Desci	ription of Project	(list outfall num	pers)				Requ	uired	Projected		
Improvements													
	2.3	Have you a that may af	ttached sheets descri fect your discharges)	ibing any addition that you now hav	al water po e underwa	ollution co y or plant	ntrol progra ned? (Optio	ams (or oth onal Item)	er enviror	nmenta	projects		

	dentificatio LD00400		NPDES Permit Number AL0069931	Facility I Robbins		Form Approved 03/05/19 OMB No. 2040-0004			
SECTION	3. SITE	DRAINAGE	MAP (40 CFR 122.26(c)(1)(i)(A))						
Drainage Map	3.1	Have you at	tached a site drainage map conta	_	nation to this application?	? (See instructions for			
		☑ Yes		□ No					
ECTION			RCES (40 CFR 122.26(c)(1)(i)(B						
	4.1	Outfall	rmation on the facility's pollutant s			Arro Drained			
		Number	(within a mile radius of the		Total Surface Area Drained (within a mile radius of the facility)				
		DSN001	22.40	specify units	21.04	specify units			
		DSNOOT	22.49	acres	31.94	acres			
				specify units		specify units			
				specify units		specify units			
				specify units		specify units			
				specify units		specify units			
				specify units		specify units			
Pollutant Sources		concrete co Rav	is and parking areas, and limit lan ntainment outside the northeast with materials and finished goods ma	corner of the plant. They sometimes be stored	ne AST's are empty. Oil is d outdoors, but are most	s no longer stored in them tly stored indoors.			
	4.3		location and a description of exist runoff. (See instructions for specif		structural control measur	res to reduce pollutants in			
				Stormwater Treatme	ent				
		Outfall Number		Control Measures and T	reatment	Codes from Exhibit 2F-1 (list)			
		DSN001	No stormwater treatment pres						

	Identification		NPDES Permit Number AL0069931		ity Name pins, LLC	Form Approved 03/05/19 OMB No. 2040-0004
SECTIO	N 5. NO	N STORMWATER	DISCHARGES (40 CFR 122.26(c)(1)(i	)(C))		
	5.1	I certify under p presence of nor discharges are d	enalty of law that the outfall(s) cove stormwater discharges. Moreover, escribed in either an accompanying Ni be first and last name)	red by this certify th	at the outfalls identified a	as having non-stormwater
		Terry Elgin	,		Managing Director	
ø		Signature Zw	y Elyi	11-20	-23	
arge	5.2	Provide the testing	g information requested in the table b			
r Disch		Outfall Number	Description of Testing Method l	Jsed	Date(s) of Testing	Onsite Drainage Points Directly Observed During Test
Non-Stormwater Discharges		DSN001	Visual Observation	***************************************	10/19/2023	
Non-St						
				······································		
SECTIO	6.1	7	OR SPILLS (40 CFR 122.26(c)(1)(i)(E		anto in the last three years	
sille	0.1		ificant leaks or spills of toxic or hazard Ils have occurred at the facility in the			
Leaks or Spills						
- Marie						
Significan						
See		LUADAE NICODU	THE LEE OF DESCRIPTION			
	See the	e instructions to det	ATION (40 CFR 122.26(c)(1)(i)(E)) ermine the pollutants and parameters is need to complete each table.	you are rec	uired to monitor and, in turn	n, the tables you must
natic	7.1		ce or new discharge?			
Discharge Information		estimated	e instructions regarding submission o data.	Ø	No → See instructions re actual data.	garding submission of
Parg		A, B, C, and D				
Disch	7.2	Have you comple	ted Table A for each outfall?		No	

	Identificatio		NPDES Permit Number AL0069931		lity Name bins, LLC	Form Approved 03/05/19 OMB No. 2040-0004							
	7.3	wastewater	subject to an effluent limitation guid	eline (ELG) or eff									
		✓ Yes			No → SKIP to Ite								
	7.4		ompleted Table B by providing quanti an ELG and/or (2) subject to effluent										
		✓ Yes			No								
	7.5	Do you know	v or have reason to believe any pollu	tants in Exhibit 2	F-2 are present in	the discharge?							
		☐ Yes		<b>V</b>	No → SKIP to Ite	em 7.7.							
	7.6		ted all pollutants in Exhibit 2F–2 that antitative data or an explanation for t			are present in the discharge and							
		☐ Yes			No								
	7.7	Do you qual	ify for a small business exemption ur	nder the criteria sp	pecified in the Instru	uctions?							
		☐ Yes •	SKIP to Item 7.18.	<b>V</b>	No								
	7.8	Do you know	v or have reason to believe any pollu	tants in Exhibit 2	-3 are present in	the discharge?							
		☐ Yes		<b>V</b>	No → SKIP to Ite	em 7.10.							
inued	7.9	Have you lis Table C?	ted all pollutants in Exhibit 2F-3 that	you know or hav	e reason to believe	e are present in the discharge in							
Sont		☐ Yes			No								
ion	7.10	Do you expect any of the pollutants in Exhibit 2F–3 to be discharged in concentrations of 10 ppb or greater?											
тта		☐ Yes		<b>V</b>	No → SKIP to Ite	em 7.12.							
Discharge Information Continued	7.11		ovided quantitative data in Table C for ns of 10 ppb or greater?	or those pollutants	s in Exhibit 2F-3 th	nat you expect to be discharged in							
scha		☐ Yes			No								
ä	7.12	Do you expe of 100 ppb o	ect acrolein, acrylonitrile, 2,4-dinitropl or greater?	nenol, or 2-methy	I-4,6-dinitrophenol	to be discharged in concentrations							
		☐ Yes		<b>V</b>	No → SKIP to Ite	em 7.14.							
	7.13		ovided quantitative data in Table C for n concentrations of 100 ppb or great		dentified in Item 7.1	2 that you expect to be							
		☐ Yes			No								
	7.14		ovided quantitative data or an explar concentrations less than 10 ppb (or										
		☐ Yes			No								
	7.15	Do you know	v or have reason to believe any pollu	tants in Exhibit 2	-4 are present in t	the discharge?							
		☐ Yes		<b>V</b>	No → SKIP to Ite	em 7.17.							
	7.16	Have you lis explanation	ted pollutants in Exhibit 2F-4 that yo in Table C?	u know or believe	to be present in th	ne discharge and provided an							
		☐ Yes			No								
	7.17	Have you pr	ovided information for the storm ever	nt(s) sampled in T	able D?								
		☑ Yes			No								

7.18	or Manufactured Toxics	NPDES Permit Number Facility Name Form Approv AL0069931 Robbins, LLC OMB No			
7.18	i manufactured Toxics			stance used or	
		Exhibits 2F–2 through 2F–4 a substamediate or final product or byproduct		ance used or	
	☐ Yes		✓ No → SKIP to Section	1 8.	
7.19	List the pollutants below,	including TCDD if applicable.			
	1.	4.	7.		
				,	
	2.	5.	8.		
	3.	6.	9.		
ON 8. BIO	LOGICAL TOXICITY TES	FING DATA (40 CFR 122.21(g)(11))		TOTAL TOTAL	
8.1		edge or reason to believe that any bio or on a receiving water in relation to y			
	☐ Yes		✓ No → SKIP to Section	n 9.	
8.2	Identify the tests and the	r purposes below.			
	Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted	
			☐ Yes ☐ No		
			☐ Yes ☐ No		
ON 9. COI	Were any of the analyses	RMATION (40 CFR 122.21(g)(12)) s reported in Section 7 (on Tables A t	Yes No	act laboratory or	
			CENTRAL CONTRACTOR		
9.1	Were any of the analyses consulting firm?  Yes	s reported in Section 7 (on Tables A t	hrough C) performed by a control  No → SKIP to Section		
	Were any of the analyses consulting firm?  Yes		hrough C) performed by a control  No → SKIP to Section	n 10.	
9.1	Were any of the analyses consulting firm?  Yes	s reported in Section 7 (on Tables A t	hrough C) performed by a contra  No → SKIP to Section firm below.	n 10.	
9.1	Were any of the analyses consulting firm?  Yes  Provide information for each	ach contract laboratory or consulting  Laboratory Number 1	hrough C) performed by a contra  No → SKIP to Section firm below.		
9.1	Were any of the analyses consulting firm?  Yes  Provide information for expension of laboratory/firm	ach contract laboratory or consulting  Laboratory Number 1  Waypoint Analytical  2790 Whitten Road, Memphis,	hrough C) performed by a contra  No → SKIP to Section firm below.	n 10.	

	Identification		PDES Permit Number AL0069931	Robbins, LLC	OMB No. 2040-0004			
SECTIO	N 10. CH	ECKLIST AND CERTIF	ICATION STATEMENT (40	CFR 122.22(a) and (d))				
	10.1	In Column 1 below, ma each section, specify in	ark the sections of Form 2F to	nat you have completed and are s that you are enclosing to alert the	have completed and are submitting with your application. For u are enclosing to alert the permitting authority. Note that not de attachments.			
		Column 1		Column 2				
		Section 1	□ w/ attachment	s (e.g., responses for additional o	utfalls)			
		Section 2	□ w/ attachment	5				
		Section 3	w/ site drainag	e map				
		Section 4 w/ attachments						
		Section 5	□ w/ attachment	S				
t		Section 6		S				
Checklist and Certification Statement		Section 7	☑ Table A	w/ small business	s exemption request			
ion S			☑ Table B	w/ analytical resu	lts as an attachment			
tificat			☐ Table C	☐ Table D				
d Cer		Section 8	□ w/attachments					
istan		Section 9	□ w/attachments	(e.g., responses for additional co	ontact laboratories or firms)			
heck		Section 10						
0	10.2	accordance with a sys submitted. Based on n for gathering the inform	of law that this document an stem designed to assure the ny inquiry of the person or pe mation, the information subm that there are significant pen	at qualified personnel properly g ersons who manage the system of itted is, to the best of my knowle	under my direction or supervision in ather and evaluate the information or those persons directly responsible adge and belief, true, accurate, and ation, including the possibility of fine			
		Name (print or type first	t and last name)	Official title				
		Terry Elgin		Managing Director				
		Signature	CAI	Date signed	2 2			
		unel	egan	11-20-	- 25			

EPA Identification Number NPDES Permit Number Facility Name Outfall Number Form Approved 03/05/19
ALD004002655 AL0069931 Robbins, LLC DSN001 OMB No. 2040-0004

		wide the results of at least one analysis for every pollutant in this table. Complete one to Maximum Daily Discharge (specify units)  Collutant or Parameter Grab Sample Taken During First 30 Minutes Flow-Weighted Composite		Average Daily (specify	y Discharge		Source of Information
	Pollutant or Parameter			Grab Sample Taken During First 30 Minutes  Flow-Weighted Composite		Number of Storm Events Sampled	(new source/new dischargers only; use codes in instructions)
1.	Oil and grease	<1.6 mg/L		<1.6 mg/L		4	
2.	Biochemical oxygen demand (BOD <sub>5</sub> )	<5.00	<5.00	<5.00	<5.00	1	
3.	Chemical oxygen demand (COD)	31.9 mg/L	<15.0 mg/L	7.975 mg/L	<15.0 mg/L	4 (Grab) & 1 (Comp)	
4.	Total suspended solids (TSS)	93 mg/L	5 mg/L	47.5 mg/L	5 mg/L	4 (Grab) & 1 (Comp)	
5.	Total phosphorus	<0.500 mg/L	<0.500 mg/L	<0.500 mg/L	<0.500 mg/L	1	
6.	Total Kjeldahl nitrogen (TKN)	<0.500 mg/L	<0.500 mg/L	<0.500 mg/L	<0.500 mg/L	1	
7.	Total nitrogen (as N)	<0.500 mg/L	<0.500 mg/L	<0.500 mg/L	<0.500 mg/L	1	
0	pH (minimum)	6.30		NA		4	
8.	pH (maximum)	7.98		NA		4	

<sup>&</sup>lt;sup>1</sup> 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 Form 3510-2F (Revised 3-19)

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 EPA Identification Number
 NPDES Permit Number
 Facility Name
 Outfall Number
 Form Approved 03/05/19

 ALD004002655
 AL0069931
 Robbins, LLC
 DSN001
 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))

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.

	Maximum Daily Discharge (specify units)		Average Daily (specify	y Discharge units)	Number of Storm	Source of Information
Pollutant and CAS Number (if available)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
Benzene	<1.00 mg/L	NA	<1.00 mg/L	NA	4	
Ethylbenzene	<1.00 mg/L	NA	<1.00 mg/L	NA	4	
Toluene	<2.00 mg/L	NA	<2.00 mg/L	NA	4	
Xylene	<1.00 mg/L	NA	<1.00 mg/L	NA	4	
Naphthalene	<5.00 mg/L	NA	<5.00 mg/L	NA	4	
тос	3.29 mg/L	2.08 mg/L	2.195 mg/L	2.08 mg/L	4 (Grab) & 1 (Comp)	

<sup>1</sup> 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 Form 3510-2F (Revised 3-19)

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EPA Identification Number ALD004002655 NPDES Permit Number AL0069931 Facility Name Robbins, LLC Outfall Number DSN001 Form Approved 03/05/19 OMB No. 2040-0004

### TABLE C. TOXIC POLLUTANTS, CERTAIN HAZARDOUS SUBSTANCES, AND ASBESTOS (40 CFR 122.26(c)(1)(i)(E)(4) and 40 CFR 122.21(g)(7)(vi)(B) and (vii))1

List each pollutant shown in Exhibits 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. Complete one table for each outfall. See the instructions for additional details and requirements.

	Maximum Dail (specify	y Discharge units)	Average Daily (specify	/ Discharge units)	Number of Storm	Source of Information
Pollutant and CAS Number (if available)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; us codes in instruction
	+					

<sup>&</sup>lt;sup>1</sup> 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 0. See instructions and 40 CFR 122.21(e)(3).

EPA Form 3510-2F (Revised 3-19)

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EPA Identification Number ALD004002655 NPDES Permit Number AL0069931 Facility name Robbins, LLC Outfall Number DSN001 Form Approved 03/05/19 OMB No. 2040-0004

### TABLE D. STORM EVENT INFORMATION (40 CFR 122.26(c)(1)(i)(E)(6))

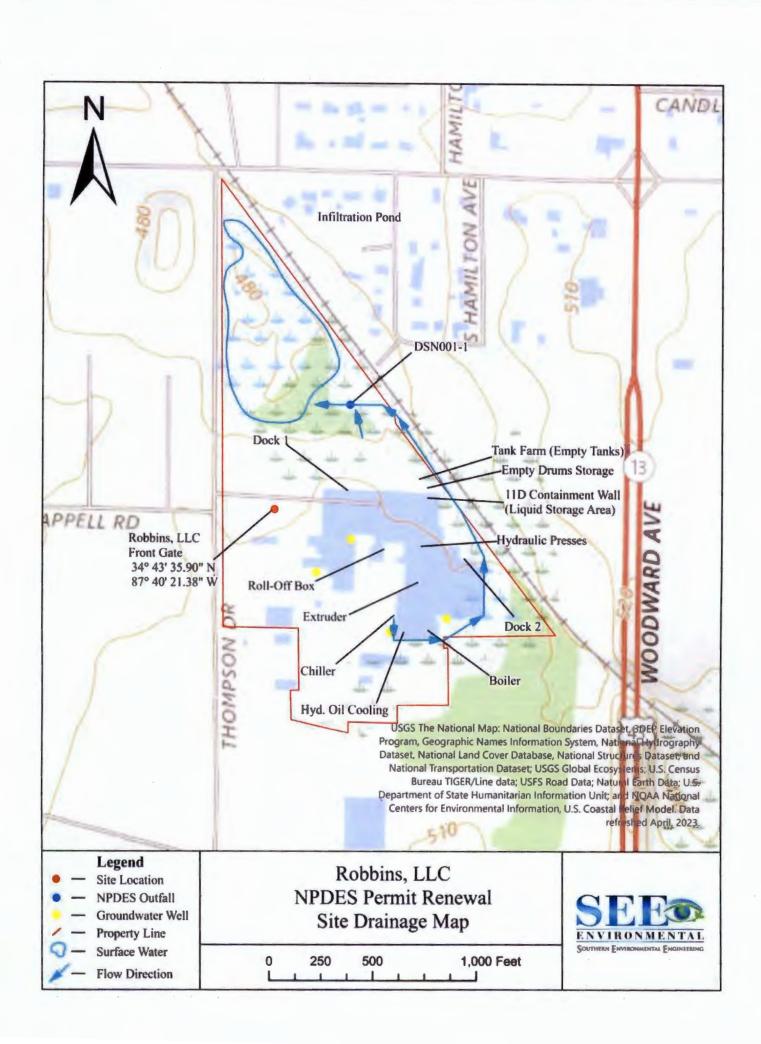
Provide data for the storm event(s) that resulted in the maximum daily discharges for the flow-weighted composite sample.

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)
11/20/2023					
	11.66	2.14	247.16	198.95	138191.25

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

Flow is measured during sample collection with a ruler in the exit culvert. This measurement is used to calculate the flow using the Manning Formula for uniform pipe flow.

EPA Form 3510-2F (Revised 3-19)





11/30/2023

Southern Environmental Engineering Mr. Eric Curtis 1222 Heltan Drive Florence, AL, 35630

Ref:

**Analytical Testing** 

Lab Report Number: 23-325-0220 Client Project Description: Robblins LLC

Permit Renewal 2D Table B Muscle Shoals, AL

Dear Mr. Eric Curtis:

Waypoint Analytical, LLC. received sample(s) on 11/21/2023 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 asreceived 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.

Andrea R Brownfield Project manager

andrew Brougheld

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.





# **Certification Summary**

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

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2024
Florida	State Program - NELAP	E871157	06/30/2024
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2024
Illinois	State Program - NELAP	200078	10/31/2024
Kentucky	State Program	80215	06/30/2024
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2024
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2024
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2024
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2024
Virginia	State Program	00106	06/30/2024
Virginia	State Program - NELAP	460181	09/14/2024



#### **Sample Summary Table**

**Report Number:** 

23-325-0220

**Client Project Description:** 

Robblins LLC Permit Renewal 2D Table B

**Muscle Shoals, AL** 

Lab No Client Sample ID	Matrix	<b>Date Collected</b>	Date Received
82437 DSN0011 (Grab)	Aqueous	11/20/2023 19:42	11/21/2023
82438 DSN0011 (Composite)	Aqueous	11/20/2023 22:48	11/21/2023



### **Summary of Detected Analytes**

**Project:** 

**Robblins LLC** 

**Report Number:** 

23-325-0220

Client Sample ID	Lab Sample ID					
Method	Parameters	Result	Units	Report Limit	Analyzed	Qualifiers
DSN0011 (Grab)	L 82437					
5310C-2014	TOC	1.95	mg/L	1.00	11/27/2023 22:13	
DSN0011 (Composite)	L 82438					
5310C-2014	TOC	2.08	mg/L	1.00	11/29/2023 20:00	



23184

Lab No:

Southern Environmental Engineering

Mr. Eric Curtis

1222 Helton Drive

Florence, AL 35630

**Project** 

Robblins LLC

Information: Permit Renewal

2D Table B

Report Date: 11/30/2023

Received: 11/21/2023

Andrea R. Brownfield Project manager

Report Number: 23-325-0220

82437

Sample ID: DSN0011 (Grab)

REPORT OF ANALYSIS

Matrix: Aqueous

Sampled: 11/20/2023 19:42

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
TOC	1.95	mg/L	1.00	1	11/27/23 22:13	ASH	5310C-2014



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robblins LLC

Information: Permit Renewal

101

2D Table B

REPORT OF ANALYSIS

Report Date: 11/30/2023

Received: 11/21/2023

Andrea R. Brownfield Project manager

Lab No:

82437

Report Number: 23-325-0220

Sample ID: DSN0011 (Grab)

Matrix: Aqueous

Sampled: 11/20/2023 19:42

Analytical Method: Prep Method:	8260B 5030B		Prep Batch(es):	L719215	11/27/23 20:42	!		
Test		Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
Benzene		<1.00	μg/L	1.00	1	11/28/23 01:33	JEG	L719225
Ethylbenzene		<1.00	μg/L	1.00	1	11/28/23 01:33	JEG	L719225
m,p-Xylene		<2.00	μg/L	2.00	1	11/28/23 01:33	JEG	L719225
Naphthalene		<5.00	μg/L	5.00	1	11/28/23 01:33	JEG	L719225
o-Xylene		<1.00	μg/L	1.00	1	11/28/23 01:33	JEG	L719225
Toluene		<2.00	μg/L	2.00	1	11/28/23 01:33	JEG	L719225
Xylene (Total)		<1.00	μg/L	1.00	1	11/28/23 01:33		L719225
Surrogate: 4-B	romofluorobenzene		108	Limits: 7	1-137%	1 11/28/23 01:3	3 JEG	L719225
Surrogate: Dib	romofluoromethane		105	Limits: 70	0-128%	1 11/28/23 01:3	3 JEG	L719225
Surrogate: 1.2	-Dichloroethane - d4		93.2	Limits: 63	3-136%	1 11/28/23 01:3	3 JEG	L719225

Surrogate: Toluene-d8

Limits: 70-130%

1 11/28/23 01:33 JEG

L719225



23184

Lab No:

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive

Florence, AL 35630

**Project** 

Robblins LLC

Information: Permit Renewal

2D Table B

REPORT OF ANALYSIS

Report Date: 11/30/2023

Received: 11/21/2023

Andrea R. Brownfield Project manager

Report Number: 23-325-0220

82438

Sample ID: DSN0011 (Composite)

Matrix: Aqueous

Sampled: 11/20/2023 22:48

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
тос	2.08	mg/L	1.00	1	11/29/23 20:00	ASH	5310C-2014



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

**Robblins LLC** 

Report No:

QC Prep:

23-325-0220

L719226

QC Analytical Batch(es): L719230

QC Prep Batch Method: 5310C-2011

**Analysis Method:** 

5310C-2014

**Analysis Description:** 

**Total Organic Carbon** 

Lab Reagent Blank

Associated Lab Samples: 82437

LRB-L719226

Matrix: AQU

mg/L

Blank

MQL

**Analyzed** 

**Parameter** TOC

Units Result

1.00

11/27/23 10:53

**Laboratory Control Sample & LCSD** 

LCS-L719226

< 1.00

LCSD-L719226

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS %Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD
TOC	mg/L	5.00	5.39	5.22	108	104	85-115	3.2	20.0

Date: 11/30/2023 12:37 PM

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### **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

**Robblins LLC** 

Report No:

23-325-0220

QC Prep:

L719706

QC Analytical Batch(es): L719756

QC Prep Batch Method: 5310C-2011

**Analysis Method:** 

5310C-2014

**Analysis Description:** 

**Total Organic Carbon** 

Lab Reagent Blank

Associated Lab Samples: 82438

LRB-L719706

Matrix: AQU

Units

Blank Result MQL

**Analyzed** 

TOC

**Parameter** 

< 1.00 mg/L

1.00

11/29/23 14:18

**Laboratory Control Sample** 

LCS-L719706

**Parameter** 

Units

Units

Units

Spike Conc.

LCS Result LCS %Rec

% Rec Limits

TOC

mg/L 5.00

4.89

RPD

98.0

85-115

**Duplicate** 

**Parameter** 

V 89858-DUP-L719706

DUP

TOC

mg/L

1.04

Result

Result 1.04 0.0 Max RPD

15.0

**Analyzed** 

11/29/23 17:29

**Matrix Spike** 

**Parameter** 

V 89859-MS-L719706

Result

**MS Spike** Conc.

7.02

MSD Spike Conc.

**MS** Result

MSD Result

MS %Rec %Rec Limits

Max **RPD** 

TOC

mg/L

1.66

9.83

116\*

85-115

Date: 11/30/2023 12:37 PM

Page 9 of 13



# **Quality Control Data**

Client ID:

Southern Environmental Engineering

LRB-L719215

**Project Description:** 

**Robblins LLC** 

Report No:

23-325-0220

QC Prep:

L719215

QC Analytical Batch(es): L719225

QC Prep Batch Method: 5030B

**Analysis Method:** 

8260B

11/27/23 23:29

11/27/23 23:29

11/27/23 23:29

11/27/23 23:29

107

102

90.8

100

71-137

70-128

63-136

70-130

**Analysis Description:** 

Volatile Organic Compounds - GC/MS

Lab Reagent Blank

Associated Lab Samples: 82437

Matrix: AQU

Parameter	Units	Blank Result	MQL	Analyzed	% Recovery	% Rec Limits	
Benzene	μg/L	< 1.00	1.00	11/27/23 23:29			
Ethylbenzene	μg/L	< 1.00	1.00	11/27/23 23:29			
m,p-Xylene	μg/L	< 2.00	2.00	11/27/23 23:29			
Naphthalene	μg/L	< 5.00	5.00	11/27/23 23:29			
o-Xylene	μg/L	< 1.00	1.00	11/27/23 23:29			
Toluene	μg/L	< 2.00	2.00	11/27/23 23:29			

**Laboratory Control Sample** 

4-Bromofluorobenzene (S) Dibromofluoromethane (S)

1,2-Dichloroethane - d4 (S)

Toluene-d8 (S)

LCS-L719215

Parameter	Units	Spike Conc.	LCS Result	LCS %Rec	% Rec Limits	
Benzene	μg/L	100	116	116	70-130	
Ethylbenzene	μg/L	100	108	108	80-120	
m,p-Xylene	μg/L	200	220	110	75-125	
Naphthalene	μg/L	100	107	107	55-145	
o-Xylene	μg/L	100	115	115	70-130	
Toluene	μg/L	100	105	105	80-120	
4-Bromofluorobenzene (S)				110	71-137	
Dibromofluoromethane (S)				107	70-128	
1,2-Dichloroethane - d4 (S)				100	63-136	
Toluene-d8 (S)				106	70-130	

Date: 11/30/2023 12:37 PM

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

**Robblins LLC** 

Report No:

23-325-0220

QC Prep:

L719215

QC Analytical Batch(es): L719225

QC Prep Batch Method: 5030B

**Analysis Method:** 

**Analysis Description:** 

Volatile Organic Compounds - GC/MS

Matrix Spike & Matrix Spike Duplicate

L 85523-MS-L719215 L 85523-MSD-L719215

Parameter	Units	Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS %Rec	MSD %Rec	%Rec Limits	RPD	Max RPD
Benzene	μg/L	< 1.00	100	100	148	154	148*	154*	58-143	3.9	30.0
Ethylbenzene	μg/L	< 1.00	100	100	138	142	138	142*	65-141	2.8	30.0
m,p-Xylene	μg/L	< 2.00	200	200	275	268	138	134	61-149	2.5	30.0
Naphthalene	μg/L	< 5.00	100	100	125	120	125	120	51-153	4.0	30.0
o-Xylene	μg/L	< 1.00	100	100	143	141	143*	141	65-142	1.4	30.0
Toluene	μg/L	< 2.00	100	100	133	138	133	138	64-145	3.6	30.0
4-Bromofluorobenzene (S)							107	105	71-137		
Dibromofluoromethane (S)							103	102	70-128		
1,2-Dichloroethane - d4 (S)							95.8	93.0	63-136		
Toluene-d8 (S)							103	103	70-130		

Date: 11/30/2023 12:37 PM

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#### **Shipment Receipt Form**

Customer Number	r: 23184				
Customer Name:	Southern Environ	nmental Eng	ineering		
Report Number:	23-325-0220	011			
		Shippin	g Method		
○ Fed Ex	US Postal	○ Lab		Other:	
UPS	Client	O Couri	er	Thermometer ID:	T136
Shipping container	cooler uncompromi	sed?	Yes	○ No	
Number of coolers	boxes received		1		
Custody seals intac	ct on shipping conta	iner/cooler?	○ Yes	○ No	<ul><li>Not Present</li></ul>
Custody seals intac	ct on sample bottles	?	○ Yes	○ No	Not Present
Chain of Custody (	COC) present?		Yes	○ No	
COC agrees with s	ample label(s)?		Yes	○ No	
COC properly com	pleted		Yes	○ No	
Samples in proper	containers?		Yes	○ No	
Sample containers	intact?		Yes	○ No	
Sufficient sample v	olume for indicated	test(s)?	Yes	○ No	
All samples receive	ed within holding tim	e?	Yes	○ No	
Cooler temperature	e in compliance?		Yes	○ No	
	rived at the laborato sidered acceptable		Yes	○ No	
Water - Sample co	ntainers properly pr	eserved	Yes	○ No	○ N/A
Water - VOA vials t	free of headspace		Yes	○ No	○ N/A
Trip Blanks receive	ed with VOAs		○ Yes	No	○ N/A
Soil VOA method 5	035 – compliance c	riteria met	○ Yes	○ No	● N/A
High concentrate	tion container (48 hi	·)	Lov	v concentration EnC	ore samplers (48 hr)
High concentrat	tion pre-weighed (m	ethanol -14 c	l) Lov	v conc pre-weighed	vials (Sod Bis -14 d)
Special precautions	s or instructions incl	uded?	○ Yes	<ul><li>No</li></ul>	
Comments:					

Date & Time: 11/21/2023 16:47:52

Signature: Makayla Weaver

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12/6/2023

Southern Environmental Engineering Mr. Eric Curtis 1222 Helton Drive Florence, AL, 35630

Ref:

**Analytical Testing** 

Lab Report Number: 23-325-0179 Client Project Description: Robbins, LLC

Permit Renewal 2F Table A

Muscle Shoals, AL

Dear Mr. Eric Curtis:

Waypoint Analytical, LLC. received sample(s) on 11/21/2023 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 asreceived 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 aciditional information.

Sincerely,

Andrea R Brownfield Project manager

andrew Brounfuld

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.





# **Certification Summary**

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

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2024
Florida	State Program - NELAP	E871157	06/30/2024
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2024
Illinois	State Program - NELAP	200078	10/31/2024
Kentucky	State Program	80215	06/30/2024
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2024
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2024
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2024
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2024
Virginia	State Program	00106	06/30/2024
Virginia	State Program - NELAP	460181	09/14/2024
_			

Page 1 of 1 00001/23-325-0179
Page 2 of 16



#### **Sample Summary Table**

Report Number:

23-325-0179

**Client Project Description:** 

Robbins, LLC

**Permit Renewal 2F Table A** 

**Muscle Shoals, AL** 

Lab No	Client Sample ID	Matrix	Date Collected	Date Received	
82435	DSN0011 (Grab)	Aqueous	11/20/2023 19:42	11/21/2023	
82436	DSN0011 (Composite)	Aqueous	11/20/2023 22:48	11/21/2023	



# Summary of Detected Analytes

Project:

Robbins, LLC

**Report Number:** 

23-325-0179

Client Sample ID	Lab Sample ID					
Method	Parameters	Result	Units	Report Limit	Analyzed	Qualifiers
DSN0011 (Grab)	L 82435					
2540D-2015	Total Suspended Solids	23	mg/L	2	11/22/2023 14:40	
DSN0011 (Composite)	L 82436					
2540D-2015	Total Suspended Solids	5	mg/L	2	11/22/2023 14:40	



Client: Southern Environmental Engineering

CASE NARRATIVE

Project: Robbins, LLC

Lab Report Number: 23-325-0179

Date: 12/6/2023

#### Oil and Grease Method 1664B

Analyte: Oil and Grease QC Batch No: L719922

Low recovery was found for the matrix spike. All other quality control is within acceptable limits. Sample

interference is suspected.

#### Biochemical Oxygen Demand (BOD) Method 5210B-2016

Analyte: BOD (5-day) QC Batch No: L718989

The dissolved oxygen (DO) depletion for the dilution water blank exceeded the 0.2 mg/L limit allowed by the reference method. For this analytical batch, the dilution water blank depleted 0.29 mg/L. While the reference method requires that sample results associated with any dilution water blank above 0.2 mg/L must be flagged, an exceedance at this level would not have a significant impact upon the calculated result. The reported result is considered to be a valid result.



23184

Lab No:

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence, AL 35630 Project

Robbins, LLC

Information: Permit Renewal 2F Table A

Muscle Shoals, AL

**REPORT OF ANALYSIS** 

Report Date: 12/06/2023

Received: 11/21/2023

Andrea R. Brownfield Project manager

Report Number: 23-325-0179

82435

Sample ID: DSN0011 (Grab)

Matrix: Aqueous

Sampled: 11/20/2023 19:42

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Ammonia Nitrogen	<0.100	mg/L	0.100	1	12/03/23 12:25	CJR	4500NH3D- <b>2</b> 011
Biochemical Oxygen Demand (5-day)	<5 d	mg/L	5	1	11/22/23 10:00	JJZ	5210B-2016
COD (Chemical Oxygen Demand)	<15.0	mg/L	15.0	1	11/27/23 12:45	RDP	5220D-2011
HEM: Oil and Grease	<1.6	mg/L	1.6	1	12/01/23 08:10	MCW	1664B
Organic N	<0.500	mg/L	0.500	1	12/03/23 12:25		CALCULATION
Total Suspended Solids	23	mg/L	2	1	11/22/23 14:40	MJT	2540D-2015
Total Kjeldahl Nitrogen	<0.500	mg/L	0.500	1	12/06/23 14:07	ANH	4500NORGD-2011
Phosphorus	<0.500	mg/L	0.500	1	12/06/23 13:42	ANH	365.4



23184

Southern Environmental Engineering

Mr. Eric Curtis 1222 Helton Drive Florence , AL 35630 Project

Robbins, LLC

Information: Permit Renewal 2F Table A

Muscle Shoals, AL

Report Date: 12/06/2023 Received: 11/21/2023

Indra Brangled

Report Number: 23-325-0179

REPORT OF ANALYSIS

Andrea R. Brownfield Project manager

Matrix: Aqueous

Lab No : **82436** 

Sample ID: DSN0011 (Composite)

Sampled: 11/20/2023 22:48

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method	
		-						
Ammonia Nitrogen	<0.100	mg/L	0.100	1	12/03/23 12:25	CJR	4500NH3D-2011	
Biochemical Oxygen Demand (5-day)	<5 d	mg/L	5	1	11/22/23 10:00	IJΖ	5210B-2016	
COD (Chemical Oxygen Demand)	<15.0	mg/L	15.0	1	11/27/23 12:45	RDP	5220D-2011	
Organic N	<0.500	mg/L	0.500	1	12/03/23 12:25		CALCULATION	
Total Suspended Solids	5	mg/L	2	1	11/22/23 14:40	MJT	2540D-2015	
Total Kjeldahl Nitrogen	<0.500	mg/L	0.500	1	12/06/23 14:10	ANH	4500NORGD-2011	
Phosphorus	<0.500	mg/L	0.500	1	12/06/23 13:43	ANH	365.4	

MQL



# **Quality Control Data**

**Client ID:** 

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-325-0179

QC Analytical Batch:

L719922

Analysis Method:

1664B

**Analysis Description:** 

Oil and Grease

Lab Reagent Blank

Associated Lab Samples: 82435

LRB

Matrix: AQU

**Parameter** 

Blank Units Result MQL

**Analyzed** 

HEM: Oil and Grease

mg/L < 1.4

1.4

12/01/23 08:10

**Ongoing Precision and Recovery** 

OPR

Parameter	Units	Spike Conc.	OPR Result	% Recovery	Analyzed	%Rec Limits	Qualifie
HEM: Oil and Grease	mg/L	40.0	35.0	88.0	12/01/23 08:10	78-114	

**Matrix Spike** 

L 85651-MS

Parameter	Units	Result	MS Spike Conc.	MSD MS Spike Conc.	Result	MSD Result	MS %Rec	%Rec Limits	Max RPD
HEM: Oil and Grease	mg/L	1.7	51.2		32.0		59.0*	78-114	

Date: 12/06/2023 03:12 PM

Page 8 of 16



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-325-0179

QC Analytical Batch:

L718707

**Analysis Method:** 

2540D-2015

**Analysis Description:** 

Total Suspended Solids

Lab Reagent Blank

LRB

Associated Lab Samples: 82435, 82436

Matrix: AQU

**Parameter** 

Blank Units Result MQL

**Analyzed** 

**Total Suspended Solids** 

mg/L < 2

2

11/22/23 14:40

**Laboratory Control Sample** 

LCS

**Parameter** 

**Spike** Units Conc.

mg/L

mg/L

LCS Result LCS %Rec

% Rec Limits

**Total Suspended Solids** 

100

104

4.5

104

90-110

**Duplicate** 

L 85642-DUP

**Parameter** Total Suspended Solids

Result Units

90

DUP **RPD** Result

86

**Max RPD** 

10

**Analyzed** 

11/22/23 14:40

Date: 12/06/2023 03:12 PM

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Page 2 of 7



# **Quality Control Data**

**Client ID:** 

Southern Environmental Engineering

**Project Description:** 

Robbins, LLC

Report No:

23-325-0179

QC Prep:

L720491

QC Analytical Batch(es): L720796,L720797

**Analysis Description:** 

QC Prep Batch Method: TKN/TKP Digestion

**Analysis Method:** 

365.4 Total Phosphorus

Lab Reagent Blank

Associated Lab Samples: 82435, 82436

Matrix: AQU

**Parameter** 

Blank Units Result MQL

**Analyzed** 

Phosphorus

mg/L < 0.500 0.500

12/06/23 13:32

**Laboratory Control Sample** 

LCS-L720491

LRB-L720491

**Parameter** 

**Spike** Units Conc.

LCS Result LCS %Rec

% Rec Limits

Phosphorus

mg/L 2.00 1.97

99.0

80-120

**Duplicate** 

**Parameter** 

L 85402-DUP-L720491

DUP

Phosphorus

Units Result mg/L

Result

**RPD** 

Analyzed

< 0.500 < 0.500 0.0

20.0 12/06/23 13:36

**Matrix Spike** 

L 85402-MS-L720491

**Parameter** 

**MS Spike** Result Conc.

MSD Spike Conc.

**MS Result** 

Max RPD

MSD Result

MS %Rec %Rec Limits

Max **RPD** 

Phosphorus

< 0.500 mg/L

Units

2.00

2.04

102

70-130

Date: 12/06/2023 03:12 PM

Page 10 of 16



## **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-325-0179

QC Analytical Batch:

L720172

Analysis Method:

4500NH3D-2011

**Analysis Description:** 

Ammonia Nitrogen (ISE)

mg/L

Units

mg/L

mg/L

Lab Reagent Blank

LRB

Matrix: AQU

Associated Lab Samples: 82435, 82436

Blank

**Analyzed** 

Ammonia Nitrogen

**Parameter** 

**Parameter** 

Units Result

0.100

MQL

12/03/23 12:25

**Laboratory Control Sample** 

LCS

< 0.100

Ammonia Nitrogen

Spike Conc.

5.00

LCS Result

5.10

20.0

LCS %Rec

MSD

Result

40.4

102

% Rec Limits

90-110

107

Matrix Spike & Matrix Spike Duplicate

L 84603-MS L 84603-MSD

20.0

**Parameter** 

Ammonia Nitrogen

MSD **MS** Spike Units Result Conc. Spike Conc.

19.1

**MS Result** 

39.9

MS %Rec

104

**MSD** %Rec %Rec Limits RPD

> 70-130 20.0 1.2

Max

**RPD** 

Date: 12/06/2023 03:12 PM

Page 11 of 16

Page 4 of 7



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-325-0179

QC Prep:

L720491

QC Analytical Batch(es): L720796,L720797

QC Prep Batch Method: TKN/TKP Digestion

Analysis Method:

4500NORGD-2011

**Analysis Description:** 

Block Digestion and FIA

Lab Reagent Blank

LRB-L720491

Matrix: AQU

Associated Lab Samples: 82435, 82436

**Parameter** Units **Blank** MQL

**Analyzed** 

Total Kjeldahl Nitrogen

< 0.500 mg/L

Result

0.500

12/06/23 13:55

**Laboratory Control Sample** 

LCS-L720491

**Parameter** 

**Spike** Conc.

LCS Result LCS %Rec

% Rec Limits

Total Kjeldahl Nitrogen

mg/L 10.0

Units

Units

Units

mg/L

9.87

99.0

90-110

**Duplicate** 

L 85402-DUP-L720491

**DUP** 

Result

< 0.500

**Parameter** Total Kjeldahl Nitrogen

< 0.500

Result

**RPD** 

0.0

**Max RPD** 

20.0

**Analyzed** 

12/06/23 13:58

**Matrix Spike** 

L 85402-MS-L720491

**Parameter** Total Kjeldahl Nitrogen

mg/L < 0.500

Result

10.0

MS Spike

Conc.

**MSD** Spike Conc.

**MS Result** 

9.91

**MSD** Result

MS %Rec

99.0

%Rec Limits

70-130

Max **RPD** 

Date: 12/06/2023 03:12 PM

Page 12 of 16

Page 5 of 7



# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-325-0179

QC Analytical Batch:

L718989

**Analysis Method:** 

5210B-2016

Analysis Method:
Analysis Description:

Biochemical Oxygen Demand (BOD)

Glucose-Glutamic Acid

GGA

Parameter	Units	Result	Range	Analyzed	
Biochemical Oxygen Demand (5-day)	mg/L	226	167.5-228.5	11/22/23 10:00	
D. P. L.		a propa pulb			

Duplicate

L 85381-DUP

Parameter	Units	Result	DUP Result	RPD	Max RPD	Analyzed
Biochemical Oxygen Demand (5-day)	mg/L	78	69	12.2	30	11/22/23 10:00

Date: 12/06/2023 03:12 PM

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# **Quality Control Data**

Client ID:

**Southern Environmental Engineering** 

**Project Description:** 

Robbins, LLC

Report No:

23-325-0179

QC Analytical Batch:

L719097

**Analysis Method:** 

5220D-2011

Units

mg/L

mg/L

mg/L

Units

**Analysis Description:** 

Chemical Oxygen Demand (COD)

Lab Reagent Blank 2

LRB2

Matrix: AQU

Associated Lab Samples: 82435, 82436

COD (Chemical Oxygen Demand)

Blank Result

< 15.0

MQL

15.0

11/27/23 12:45

**Analyzed** 

**Laboratory Control Sample** 

LCS

**Parameter** 

**Parameter** 

**Spike** Units Conc.

LCS Result

LCS %Rec

% Rec Limits

COD (Chemical Oxygen Demand)

75.0

73.2

98.0

95-105

**Duplicate** 

L 82510-DUP

COD (Chemical Oxygen Demand)

**Parameter** 

**DUP** Result Units Result

< 15.0

**RPD** 0.0

< 15.0

MS Spike

Conc.

78.9

10.0

Max RPD

11/27/23 12:45

**Analyzed** 

**Matrix Spike** 

**Parameter** 

L 82510-MS

COD (Chemical Oxygen Demand)

mg/L < 15.7

Result

Conc.

**MSD** 

Spike

**MS Result** 

**MSD** Result

MS %Rec

%Rec Limits

Max **RPD** 

83.6

106

70-130

Date: 12/06/2023 03:12 PM

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Page 7 of 7



0 1	00404	Snipment	neceipti	Oilli	
Customer Number					
Customer Name:	Southern Environ	mental Eng	gineering		
Report Number:	23-325-0179	Shinnir	ng Method		
		Shippii	ig wethou		
○ Fed Ex	US Postal	○ Lab		Other:	
O UPS	<ul><li>Client</li></ul>	O Couri	ier	Thermometer ID:	T136
Shipping container	cooler uncompromis	sed?	Yes	○ No	
Number of coolers	boxes received		1		
Custody seals intac	ct on shipping contain	ner/cooler?	○ Yes	○ No	<ul><li>Not Presen</li></ul>
Custody seals intac	ct on sample bottles?	•	○ Yes	○ No	<ul><li>Not Present</li></ul>
Chain of Custody (	COC) present?		Yes	○ No	
COC agrees with s	ample label(s)?		Yes	○ No	
COC properly com	pleted		Yes	○ No	
Samples in proper	containers?		Yes	○ No	
Sample containers	intact?		Yes	○ No	
Sufficient sample v	olume for indicated t	est(s)?	Yes	○ No	
All samples receive	ed within holding time	?	Yes	○ No	
Cooler temperature	e in compliance?		Yes	○ No	
	rived at the laborator sidered acceptable and the side acceptable and the side an		Yes	○ No	
Water - Sample co	ntainers properly pre	served	Yes	○ No	○ N/A
Water - VOA vials t	free of headspace		○ Yes	○ No	● N/A
Trip Blanks receive	ed with VOAs		○ Yes	○ No	● N/A
Soil VOA method 5	035 – compliance cr	iteria met	○ Yes	○ No	● N/A
High concentrate	tion container (48 hr)		Lov	w concentration EnC	ore samplers (48 hr
High concentrat	tion pre-weighed (me	thanol -14 c	d) Lov	w conc pre-weighed	vials (Sod Bis -14 d)
Special precautions	s or instructions inclu	ided?	○ Yes	<ul><li>No</li></ul>	
Comments:					

Date & Time: 11/21/2023 16:44:19 Signature: Makayla Weaver

SEE PO Box	x 3241 ce, AL 35		Client Project Manager/Cont Eric Curtis (256) 443-8306 ecurtis@see-env.com	act		Sar	ng Informa	etion		For I	For Laboratory Use Only			
Robbins	Renewal		Project/Site Location (Otty/Site Muscle Shoals, AL				RUSH – Ac Special De Date Resu	tection Li		Method of Shipment Fed Ex UPS USPS Courier Client Drop Off Other				
Project	Number		Project Manager Phone # (256) 443-83	300	6	1	ect Manag		-env.con	Purchase Order Number	Site/Facility ID #			
Memp	Whiten Rhis, TN 38		Unless noted, all containers per Table II of 40 CFR Part 136.	umber of Containers	Matrix (Refer to Key)	(G)rab or (C)omposite	BOD, TSS	COD, Total P, TKN, TON	Oil and Grease		A Cool < 10C Na25 B Cool <= 8C C H2SO4 pH<2 D None Required E NaCH pH>10 F HNO3 pH<2 G HCL pH<2 H H3PO4 pH<2 I Cool <= 6C NA25	203 (Micro Only)		
Date									Required /	Analysis / Preservative	Comments	/Notes		
11/20/27	1942				SW	G	V			- 1970年 1970年 1971年 1971年 1971年 1971年 1870年 1971年 1870年 1971年 19				
1	1942				SW	G		1		23-325-0179 23184 11-21-2023				
	1942	DSN0011 (	Grab)	2	SW	G	1		1	Southern Environmental Engineer Robbins, LLC	ering 16:43:58			
	2148	DSN0011 (	Composite)	1	sw	С	1							
V	2248	DSN0011 (	Composite)	1	sw	С		1		$\Box$				
		For Laboratory		Sam	pled by	(Name	- Print)			Client Remarks/Comments				
(v) N	200	istody Seals	Lab Comments				Denn			Temp:	pH:			
	nk/Cooler 1	emp		Kelin S	nquishe	d by: (S	SIGNATUR	RE)		Date Time Received by: (SIG	NATURE)	Date Time  Date Time		
70	gor			Kem	details	uy, (.	ALCOHOL OF			Date Time Received/by SIG	arrandens	Date   Time   30		