

LANCE R. LEFLEUR  
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KAY IVEY  
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Alabama Department of Environmental Management  
[adem.alabama.gov](http://adem.alabama.gov)

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

April 19, 2024

Mr. Melvin Fulson  
Keystone Foods, LLC - Banks Feed Mill  
498 County Road 4434  
Banks, AL 36005

RE: **UIC PERMIT NUMBER ALSI9955545**  
Banks Feedmill  
498 County Road 4434  
Banks, Pike County, AL

Dear Mr. Fulson:

A **Draft** copy of the permit is enclosed for your review.

If you have any comments on the draft permit, please submit them to this office **within the next thirty (30) days** so that any issues of concern might be resolved.

If you have any questions concerning this permit, please contact me at (334) 271-7959 or [jessica.spence@adem.alabama.gov](mailto:jessica.spence@adem.alabama.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jessica Spence".

Jessica Spence  
UIC Program

Enclosure

JS/

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

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



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

**Mobile-Coastal**  
3664 Dauphin Street, Suite B  
Mobile, AL 36608-1211  
(251) 304-1176  
(251) 304-1189 (FAX)



# UNDERGROUND INJECTION CONTROL PERMIT

**PERMITTEE:** Keystone Foods, LLC - Banks Feed Mill

**FACILITY/LOCATION:** Banks Feedmill  
498 County Road 4434  
Banks, Pike County, Alabama  
Lat: N 31.788333°/Long: W -85.820278°

**PERMIT NUMBER:** ALSI9955545

**INJECTION WELL CLASS:** Class V

**SOURCE OF POLLUTANTS:** Sanitary wastewater effluent and wastewater from the operation of a steam generator which produces blowdown water.

*In accordance with and subject to the provisions of the Safe Drinking Water Act, as amended, 42 U.S.C. §§ 300f-300j (the "SDWA"), the Alabama Water Pollution Control Act, as amended, Code of Alabama 1975, §§ 22-22-1 to 22-22-14, (the "AWPCA"), the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§ 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the terms and conditions set forth in this permit, the Permittee is hereby authorized to construct and operate injection well(s) of the above-described class.*

**ISSUANCE DATE:**

**EFFECTIVE DATE:**

**EXPIRATION DATE:**

**PART I Authorization to Operate**

- A. The permittee is authorized to operate a Class V Injection Well, at the facility described in the permit application and in the cover page of this permit, in accordance with the provisions set forth in this permit. In the case of this permit, the drainage field is defined as the injection well.
- B. Only the sanitary wastewater effluent and blowdown water approved by the Alabama Department of Environmental Management (ADEM) shall be injected.
- C. This permit and the authorization to inject shall remain in effect until the expiration date stated on the cover page of this permit. If the permittee desires to continue injection past the expiration date of this permit, the permittee shall request a permit reissuance at least 180 days prior to expiration of this permit.

**PART II Construction Requirements**

- A. Injection Well Requirements
  - 1. The permittee shall maintain a grit separation device.
  - 2. The permittee shall maintain an oil separation device.
  - 3. The permittee shall inject only wastewater that has been treated by passing through a grit separation device and an oil separation device.
  - 4. The permittee shall provide a means of sampling the wastewater being injected after treatment and prior to injection.
- B. Monitoring Well Construction
  - 1. The permittee shall maintain a monitoring well down gradient of the injection field for the purpose of monitoring groundwater quality.
  - 2. The monitoring well should include the following.
    - a) The permittee shall screen the monitoring well in the uppermost saturated zone. The well screen shall be of sufficient length to account for seasonal fluctuations in the water table and affects of the injection field.
    - b) The annulus around the well casing above the well screen shall be sealed with bentonite to prevent the passage of surface water or injection field water.
    - c) The surface installation shall include a concrete protective pad around the base of the well, a metal protective casing, and a locking cap.
  - 3. All surface water shall be routed away from the monitoring well's surface installation.

## C. Modifications

Approval by ADEM shall be obtained prior to modification of any injection well or supporting surface. Modification shall mean any action that will change the configuration of the well beneath the surface, the methods of monitoring injection, or will result in injection of a fluid not specifically authorized by this permit.

**PART III Monitoring and Operating Requirements**

## A. Injection Fluid

1. The permittee shall not inject any substance that is defined as hazardous or toxic by Federal or State laws or regulations or any substance not identified in the application for this permit. The proposed use of substances other than those identified in the permit application must be reviewed and approved by ADEM prior to use.
2. The permittee shall monitor the fluid to be injected as specified in Appendix A of this permit.
3. The permittee shall not exceed the limits established in Appendix A of this permit.
4. ADEM may change the sampling requirements if the sampling data indicates a need to do so.

## B. Monitoring Well

1. The permittee shall sample the monitoring well in accordance with Appendix B of this permit. The permittee is required to sample the well prior to injection and in accordance with the frequency indicated in Appendix B of this permit.
2. The permittee shall not exceed the limits established in Appendix B of this permit.
3. The permittee shall purge the monitoring well prior to sampling.
4. ADEM may change the sampling requirements if the sampling data indicates a need to do so.

## C. Operation

1. The drainage field operated under this permit shall function properly and wastewater shall not surface or saturate the uppermost soil layer. Should the drainage field fail to function properly, the permittee shall take corrective action, to include cessation of injection, as required by ADEM.
2. The permittee shall adopt the following best management practices:
  - a) Inspect terminal equipment, tanks, and chemical containers regularly for leaks.
  - b) Calibrate treatment and application equipment regularly.

- c) Comply with Federal, State, and local solids and liquid waste disposal regulations.

#### **PART IV Records, Reports, & Submittals**

##### **A. Records**

1. The permittee shall record the information listed below for all monitoring activities:
  - a) The date, exact place, and time of sampling or sampling measurement(s);
  - b) The name of individual(s) who perform the sampling or measurement(s);
  - c) The date(s) analyses were performed;
  - d) The name of the individual(s) who performed the analyses;
  - e) The analytical or technical methods used;
  - f) The results of each analysis performed; and
  - g) The completed chain-of-custody forms for all samples collected.
2. The permittee shall retain all records concerning the data used to complete the permit application, the operation of the wells, and the nature and composition of pollutants injected; to include records of the calibration of instruments, meters and gauges, quality control records, and recordings from continuous monitoring instrumentation; until at least three years after the closure of well(s).
3. When requested by ADEM, the permittee shall deliver to the ADEM copies of any of the records maintained in accordance with this permit.

##### **B. Reports**

1. **Within 30 days upon the effective date of this permit the permittee must enroll and participate in the Department's Alabama Environmental and Permitting Compliance System (AEPACS) (<https://adem.alabama.gov/aepacs>).** Once the permittee is enrolled in the system, the permittee must utilize the system for the submittal of DMRs. If the system is down due to technical problems originating with the Department's system, the permittee is not relieved of the obligation to submit DMR data by the required submittal date via faxing, e-mailing, mailing, or hand-delivery of data such that they are received by the required reporting date.
2. The permittee shall submit not later than 28 days after the reporting period, a monitoring report which shall include:
  - a) The date and exact place of sampling;
  - b) The results of each analysis performed.
3. The permittee shall report to ADEM any of the following:

- a) Any planned action which will change the use of the injection well, will result in injection of a fluid different from that authorized by this permit, will change the method of operations of any injection well, or will change the method of the monitoring of well operations or injected fluids.
- b) Any planned transfer of ownership of all or part of the permitted facility.
- c) Any relevant facts of which the permittee becomes aware which should have been submitted in a permit application and any corrections to data previously submitted in a permit application.

4. Other Submittals

Studies, engineering reports, plans and specifications, plugging and abandonment plans, logging reports, and other technical documents submitted to comply with this permit shall be prepared by or under the supervision of qualified persons defined by the Underground Injection Control (UIC) Regulations of ADEM.

**PART V Plugging and Abandonment**

The permittee shall perform any abandonment and closure actions that may be required by ADEM to remove a threat to groundwater quality or to the health of persons which is caused by the injection activity.

**PART VI Permit Modification, Revocation, Suspension, and Termination**

- A. ADEM may impose emergency additional conditions to this permit when necessary to protect waters of the state from pollution. These conditions may include suspension of the permit to inject and shall remain in effect until the permit is modified, revoked, suspended or terminated in accordance with the UIC Regulations of ADEM.
- B. Non-emergency permit modification, revocation, suspension, and termination actions shall be accomplished in accordance with ADEM Administrative Code Rule 335-6-8.

**PART VII General Provisions**

- A. The permittee shall comply with all provisions of the UIC Regulations of ADEM and shall comply with all provisions of this permit and shall reduce or halt injection if needed to maintain compliance with the permit and regulations.
- B. The permittee shall comply with all applicable Federal and State hazardous waste management regulations.
- C. The permittee shall allow members of ADEM staff to:
  1. Access property and records of the permittee for purposes of inspection.
  2. Collect samples of the injected fluids, process and wastewater streams associated with the permitted injection wells.
  3. Collect samples from any monitoring wells.

4. Obtain copies of records upon request.
- D. The permittee shall immediately take all reasonable steps to minimize or correct any adverse environmental impact resulting from the operation of the permitted injection wells.
- E. This permit does not convey any property rights of any sort, or any exclusive privilege.
- F. The filing of a request by the permittee for a permit modification, revocation, and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- G. Any noncompliance with this permit constitutes a violation of the Alabama Water Pollution Control Act and/or the UIC Regulations and is grounds for enforcement action such as permit termination, revocation, modification; or denial of a permit renewal application.
- H. Injection to waters of the state, which in this case is groundwater, in accordance with this permit shall not result in the exceedance of a Maximum Contaminant Level (MCL) as established by the Environmental Protection Agency. Injection to groundwater, in accordance with this permit shall not result in a violation of a surface water quality standard.
- I. All provisions of ADEM Admin. Code Rule 335-6-8-.12 are incorporated as terms and conditions of this permit by reference.
- J. The permittee authorized to discharge under this permit, who wishes to continue to discharge upon the expiration of this permit, shall submit an application for reissuance, using the Department's Alabama Environmental Permitting and Compliance System (AEPACS), unless the Permittee submits in writing valid justification as to why the electronic submittal process cannot be utilized and the Department approves in writing the utilization of hard copy submittals. The AEPACS can be accessed at the following link: <http://adem.alabama.gov/AEPACS>. Such application shall be submitted at least 180 days prior to the expiration date of this permit. Permit requests for initial issuance and modifications of the existing permit should all be submitted through the AEPACS system.

## APPENDIX A

The blowdown wastewater discharge (EFF-01) shall be limited and monitored by the permittee as specified below:

<u>EFFLUENT CHARACTERISTICS</u>	<u>UNITS</u>	<u>DISCHARGE LIMITS</u>	<u>MONITORING REQUIREMENTS</u>	
			<u>FREQUENCY</u>	<u>SAMPLE TYPE</u>
pH	S.U.	Report	Weekly	Grab
Chloride	mg/l	Report	Quarterly	Grab
Sulfate	mg/l	Report	Quarterly	Grab
Total Nitrate	mg/l	10	Quarterly	Grab
Total Dissolved Solids	mg/l	Report	Quarterly	Grab

The sanitary wastewater discharge (EFF-02) shall be limited and monitored by the permittee as specified below:

<u>EFFLUENT CHARACTERISTICS</u>	<u>UNITS</u>	<u>DISCHARGE LIMITS</u>	<u>MONITORING REQUIREMENTS</u>	
			<u>FREQUENCY</u>	<u>SAMPLE TYPE</u>
Biochemical Oxygen Demand (BOD5)	mg/l	Report	Quarterly	Grab
Total Suspended Solids (TSS)	mg/l	Report	Quarterly	Grab
Total Kjeldahl Nitrogen (TKN)	mg/l	Report	Quarterly	Grab
pH	S.U.	Report	Quarterly	Grab



## APPENDIX B

The down gradient monitoring well (MW-01) and the upgradient monitoring well (MW-02) shall be limited and monitored by the permittee as specified below:

<u>GROUNDWATER CHARACTERISTICS</u>	<u>UNITS</u>	<u>DISCHARGE LIMITS</u>	<u>MONITORING REQUIREMENTS</u>	
			<u>FREQUENCY</u>	<u>SAMPLE TYPE</u>
pH	S.U.	Report	Semi-Annually	Grab
Chloride	mg/l	Report	Semi-Annually	Grab
Sulfate	mg/l	Report	Semi-Annually	Grab
Total Nitrate	mg/l	10	Semi-Annually	Grab
Total Dissolved Solids	mg/l	Report	Semi-Annually	Grab

## ADEM Permit Rationale

Date: April 18, 2024  
Prepared By: Jessica Spence

Permittee Name: Keystone Foods LLC - Banks Feed Mill  
c/o Melvin Fulson  
498 County Road 4434  
Banks, AL 36005

Facility/Site Name: Banks Feedmill

Location: 498 County Road 4434  
Banks, Pike County, AL 36005  
Latitude: 31.788333/Longitude: -85.820278

UIC Permit Number: ALSI9955545

Draft permit is: Reissuance with NOC

Injection Description: Sanitary wastewater effluent and wastewater from the operation of a steam generator which produces blowdown water.

Discussion: Standard permit drafted.

1. No hazardous injection
2. Sampling point required
3. Discharge must be sampled according to Appendix A and Appendix B
4. Monitoring well must be sampled semi-annually
5. Results must be submitted in a timely manner
6. Best Management Practices included in permit
7. AEPACS Participation Requirement
8. AEPACS required to be utilized for permit reissuances/modifications/transfers