

Stella-Jones Corporation
Bay Minette, Alabama
EPA I.D. Number ALD 031 490 501

FACT SHEET

A draft Alabama Hazardous Waste Management and Minimization Act (AHWMMA) permit has been prepared for the Stella-Jones Corporation facility. This hazardous waste facility is located in Bay Minette, Alabama. This fact sheet has been prepared to briefly advise the public of the principal permitting, legal and policy issues of the draft permit.

I. PERMIT PROCESS

The purpose of the permitting process is to allow the State and the public to Stella-Jones Corporation's ability to comply with the hazardous waste management requirements of the AHWMMA, as amended. Stella-Jones Corporation must comply with hazardous waste management conditions set forth in the permit during the effective period of the permit, which is ten (10) years from the last permit renewal (September 14, 2014).

II. PROCEDURES FOR REACHING A FINAL DECISION

The Alabama Department of Environmental Management (ADEM or Department) is proposing to issue Stella-Jones Corporation-Bay Minette Hwy 31 a permit modification for post-closure care for a closed surface impoundment which has been closed as a single landfill unit with wastes and/or contaminated soils remaining in-place.

ADEM Admin. Code r. 335-14-8-.08(6)(b)1. requires that the public be given at least a 45-day comment period for each draft permit. The comment period will begin on May 17, 2024, which is the date of publication of the public notice in major local newspaper(s) of general circulation, and will end on July 1, 2024. The public notice will also be broadcast over local radio station(s).

Any person interested in commenting on the application or draft permit must do so within the 45-day comment period discussed above.

All persons wishing to comment on any of the permit conditions or the permit application should submit their comments in writing to the Alabama Department of Environmental Management, Permits and Services Division, 1400 Coliseum Blvd. (zip 36110-2059), P.O. Box 301463 (zip 36130-1463) Montgomery, Alabama, ATTENTION: Mr. Russell A. Kelly.

ADEM will consider all written comments received during the comment period while making a permit decision for this facility. When the Department makes its final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision.

III. FACILITY DESCRIPTION

The facility has been conducting wood preserving operations since 1958. Creosote was the only preservative in use from 1958 to 1976. Pentachlorophenol was added in 1976, and from 1976 to 1989, both creosote and pentachlorophenol were used. Only pentachlorophenol has been in use since 1989. The principal products produced are utility poles. The hazardous waste which was managed in the closed surface impoundment (SWMU 1) contained a K001 waste code. SWMU 1 has an approved cap and cover installed over the remaining waste. These actions are intended to mitigate the potential for future groundwater contamination. The permit contains provisions for

post-closure care for the closed surface impoundment and corrective action for groundwater contamination.

IV. SUMMARY OF PROPOSED MODIFICATIONS

Changes to the permit application and Post-Closure permit were limited to changes in ownership from Baldwin Pole & Piling Company, Inc. to Stella-Jones Corporation.

V. CHANGES TO EXISTING PERMIT

The specific changes to the permit are explained below.

| Section/Appendix | | <u>Reason</u> |
|------------------------------------|--------------------------------|--|
| Location in Permit | Location in Application | |
| Cover Page w/ Logo | N/A | Updated new owner information and Minor Mod date |
| Signature Page & Table of Contents | N/A | Updated new owner information and Minor Mod date |
| N/A | Revised Part A Application | Updated Part A with new ownership information |

VI. TECHNICAL CONTACT

Amber Hicks
Engineering Services Section
Industrial Hazardous Waste Branch, Land Division
Alabama Department of Environmental Management
1400 Coliseum Blvd (zip 36110-2059)
P.O. Box 301463 (zip 36130-1463)
Montgomery, Alabama
(334) 270-5608



HAZARDOUS WASTE FACILITY PERMIT

PERMITTEE: Stella-Jones Corporation

ADDRESS: Highway 31 North
Bay Minette, Alabama 36507

PERMIT NUMBER: ALD 031 490 501

UNITS PERMITTED: Post Closure Care For a Surface
Impoundment Closed As Landfill

ISSUANCE DATE: September 4, 2014
XX XX, 2024 – Modification 1 -Major

EFFECTIVE DATE: September 4, 2014

EXPIRATION DATE: September 3, 2024

This Permit is issued pursuant with the Code of Alabama 1975, §§ 22-30-1-et. seq., as amended, and regulations adopted thereunder and the Hazardous Wastes Management and Minimization Act and in accordance with the plans and specifications and applications filed with the Department subject to the conditions appended hereto, all of which are considered a part of this Permit. This Permit shall be subject to all applicable laws of the State of Alabama, rules and regulations and orders of the Department of Environmental Management and shall be effective from the date of issuance.

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
HAZARDOUS WASTE PERMIT

| | | |
|-----------------------------------|-------------------------------|------------------------|
| <u>Permittee:</u> | <u>Permit Number:</u> | <u>ALD 031 490 501</u> |
| <u>OWNER/OPERATOR:</u> | <u>Identification Number:</u> | <u>ALD 031 490 501</u> |
| <u>Stella-Jones Corporation</u> | | |
| <u>1101 Highway 31 North</u> | | |
| <u>Bay Minette, Alabama 36507</u> | | |
| <u>Baldwin County</u> | | |

Pursuant to the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), Code of Ala. 1975, Section 22-30-1, et. seq., as amended, and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM or the Department), a permit is issued to Stella-Jones Corporation for the facility located in Bay Minette, Alabama, at latitude N 30° 52' 30" and longitude W 87° 46' 27".

The Permittee must comply with all terms and conditions of this permit, which consists of the conditions set forth herein (including those in any attachments), and the regulations applicable to the Permittee's facility contained in Chapters 335-14-1, 335-14-2, 335-14-5, 335-14-8, and 335-14-9 of the ADEM Administrative Code of Regulations (hereinafter referred to as the "ADEM Admin. Code r."). Applicable regulations are those which are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated July 3, 2013, as modified by subsequent amendments dated February 24, 2014, June 12, 2014, and September 21, 2023 (hereby incorporated by reference and hereafter referred to as the Application) is accurate and that the facility will be constructed and operated as specified in the Application. Any inaccuracies found in this information could lead to the termination or modification of this permit in accordance with ADEM Admin. Code r. 335-14-8-.04(2), 335-14-8-.04(3), and 335-14-8-.04(4) and could lead to potential enforcement action. The Permittee must inform ADEM of any deviation from or changes in the information provided in the Application that would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of September 4, 2014, as modified on XX XX, 2024 and shall remain in effect until September 3, 2024 unless revoked and reissued, or terminated under ADEM Admin. Code r. 335-14-8-.04(2) and 335-14-8-.04(4) or continued in accordance with ADEM Admin. Code r. 335-14-8-.05(2).

Alabama Department of Environmental Management

Date Signed

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Documents Incorporated By Reference:

Part A and Part B Permit Application submitted on July 3, 2013, as modified by subsequent amendments dated February 24, 2014, June 12, 2014, and September 21, 2023.

Corrective Measures Study/Corrective Measures Implementation Plan submitted on October 1, 1999, as modified by subsequent amendments dated June 15, 2005.

PART I

STANDARD AND GENERAL FACILITY CONDITIONS

I.A. EFFECT OF PERMIT

Issuance of this permit does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under the AHW MMA, or any other law governing the protection of public health or the environment, for any imminent and substantial endangerment to human health, welfare, or the environment.

I.B. 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.

I.C. DUTIES AND REQUIREMENTS

1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of the AHW MMA, and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply

- a. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit.
- b. The Permittee must submit an application for a new permit for both post-closure and Solid Waste Management Unit (SWMU) corrective measures at least 180 calendar days before the expiration of this permit. The Permittee must reapply in order to fulfill the 30-year post-closure care period required by ADEM Admin. Code r. 335-14-5-.07(8)(a)1. The Department may shorten or extend the post-closure care period applicable to the hazardous waste facility in accordance with ADEM Admin. Code r. 335-14-5-.07(8)(a)2 and 335-14-8-.03(1)(b).

3. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

4. Duty to Mitigate

In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

5. Proper Operation and Maintenance

The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment, monitoring, and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance (O&M) 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 or similar systems only when necessary to achieve compliance with the conditions of this permit.

6. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause as specified in ADEM Admin. Code r. 335-14-8-.04(2), 335-14-8-.04(3), and 335-14-8-.04(4). The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay any permit condition.

7. Property Rights

Issuance of this permit does not convey any property rights of any sort, nor any exclusive privilege.

8. Duty to Provide Information

The Permittee shall furnish to the Department, within a reasonable time as determined by the Department, any relevant information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

9. Inspection and Entry

The Permittee shall allow duly designated officers and employees of the Department or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and,
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the AHWMMMA, any substances or parameters at any location. The Permittee shall have the opportunity to split samples during sampling.
10. Monitoring and Records
- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from ADEM Admin. Code r. 335-14-2-Appendix I or the methods specified in Exhibit 14 of the permit application. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 (latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Standard Methods for the Examination of Water and Wastewater (latest edition), the methods specified in Exhibit 14 of the permit application, or an alternative method approved by ADEM. [ADEM Admin. Code r. 335-14-8-.03(1)(j)1.]
 - b. The Permittee shall maintain at the facility records of all monitoring information including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, the certification required by ADEM Admin. Code r. 335-14-5-.05(4)(b)9., records of all data used to prepare documents required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the certification, application, sample, measurement, report or record, or until corrective action is completed, whichever date is later. This period may be extended by the Department at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. [ADEM Admin. Code r. 335-14-5-.05(5)(b) and 335-14-8-.03(1)(j)2.]
 - c. The Permittee shall maintain, at the facility, records of all groundwater monitoring wells, piezometers, and associated groundwater surface elevations throughout the post-closure care period. These records shall include the surveyed location, surveyed elevation, surveyed elevation reference point, total depth, screened interval, construction details, well log, and all other pertinent information for each well and piezometer.
 - d. Records for monitoring information shall include:
 - i. The date(s), exact place, and times of sampling or measurements;
 - ii. The names of individual(s) who performed the sampling or measurements;

- iii. The date(s) analyses were performed;
 - iv. The names of individual(s) who performed the analyses;
 - v. The analytical techniques or methods used; and,
 - vi. The results of such analyses.
- e. The following documents and information shall be maintained throughout the post-closure care period at the Facility.
- i. Complete copy of this permit and the permit application.
 - ii. Operating record as required by ADEM Admin. Code r. 335-14-5-.05(4) and this permit.
 - iii. Copies of all plans, reports, inspection schedules, inspection logs as required by ADEM Admin. Code r. 335-14-5 and this permit.

11. Signatory Requirements

All applications, reports or information required by this permit and submitted to the Department shall be signed and certified in accordance with ADEM Admin. Code r. 335-14-8-.02(2) and 335-14-8-.03(1)(k).

12. Reporting Requirements

a. Planned Changes

The Permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility and any solid waste management units identified under Part IV of this permit.

b. Anticipated Noncompliance

The Permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

c. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to ADEM Admin. Code r. 335-14-8-.04(1) or 335-14-8-.04(3)(a)1.(vii). Before transferring ownership or operation of the facility during its post-closure period, the Permittee shall notify the new owner or operator, in writing, of the requirements of ADEM Admin. Code r. 335-14-5 and 335-14-8 and this permit.

d. Monitoring Reports

Monitoring results shall be reported at the intervals specified elsewhere in this permit.

e. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Department no later than 14 calendar days following each schedule date.

f. Twenty-Four Hour Reporting

i. The Permittee shall report to the Department any noncompliance with this permit that may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include, but is not limited to, the following:

- (I) Information concerning the release of any hazardous waste which may endanger public drinking water supplies; and,
- (II) Information concerning the release or discharge of any hazardous waste, or hazardous waste constituents, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility.

ii. The description of the occurrence and its cause shall include:

- (I) Name, address, and telephone number of the owner or operator;
- (II) Name, address, telephone number, and EPA Identification Number of the facility;
- (III) Date, time, and type of incident;
- (IV) Name and quantity of material(s) involved;
- (V) The extent of injuries, if any;
- (VI) An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and,
- (VII) Estimated quantity and disposition of recovered material that resulted from the accident.

iii. A written submission shall also be provided within 5 calendar days of the time that the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its

cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

g. Other Noncompliance

The Permittee shall report to the Department all instances of noncompliance not otherwise required by Permit Conditions I.C.12.d., I.C.12.e., or I.C.12.f. at the time any other reports required by this permit are submitted. The reports shall contain the information required by Permit Condition I.C.12.f.

h. Other Information

Where 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 Department, it shall promptly submit such facts or information. In addition, upon request, the Permittee shall furnish to the Department any information related to compliance with this permit.

13. Certification of Construction

The Permittee may not commence treatment, storage or disposal of hazardous waste or contaminated media at any new or modified portion of the facility until the Permittee has submitted to the Department, by certified mail or hand-delivery, a letter (together with the certification by the Construction Quality Assurance (CQA) officer required by ADEM Admin. Code r. 335-14-5-.02(10)(d) and any other certifications required by this permit or ADEM Admin. Code r. 335-14) signed by the Permittee and an Alabama-registered professional engineer, stating that the facility has been constructed or modified in compliance with this permit where appropriate; and,

- a. The Department has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of this permit; or
- b. The Department has either waived the inspection or has not notified the Permittee, within 15 calendar days of the notification from the Permittee, of its intent to inspect. [ADEM Admin. Code r. 335-14-8-.03(1)(1)2.]

14. The Permittee shall assure that all measures necessary to maintain and/or achieve compliance with all applicable requirements of ADEM Admin. Code r. 335-14 are taken during the active life of the facility and throughout the post-closure care period, corrective action period, and the term of this permit.

15. In the event that circumstances beyond the Permittee's control arise to prevent achievement of any deadline set forth by this permit, the Permittee may immediately, upon the occurrence thereof, request an extension by sending a written request to the Department explaining the need for the extension. The Department may, after consideration of the circumstances, grant the extension. Requests for extensions may require a permit modification pursuant to ADEM Admin. Code r. 335-14-8-.04(2) or (3).

I.D. DEFINITIONS

For the purposes of this permit, terms used herein shall have the same meaning as those in ADEM Admin. Code r. 335-14-1, 335-14-2, 335-14-5, and 335-14-8, unless this permit specifically provides otherwise. Where terms are not defined in the regulations or this permit, a standard dictionary reference or the generally accepted scientific or industrial meaning of the term shall define the meaning associated with such terms.

"Area of concern" (AOC), for the purposes of this permit, includes any area having a probable release of a hazardous waste or hazardous constituent which is not from a solid waste management unit and is determined by the Department to pose a current or potential threat to human health or the environment. Such areas of concern may require investigations and remedial action as required under Section 3005(c)(3) of the Resource Conservation and Recovery Act and ADEM Admin. Code r. 335-14-8-.03(3)(b)2. in order to ensure adequate protection of human health and the environment.

"Contamination," for the purposes of this permit, refers to the presence of any hazardous constituent in a concentration that exceeds the naturally occurring concentration of that constituent in the immediate vicinity of the facility (*i.e.*, areas not affected by the facility).

"Extent of contamination," for the purposes of this permit, is defined as the horizontal and vertical areas in which the concentrations of hazardous constituents in the environmental media being investigated are above detection limits or background concentrations indicative of the region, whichever is appropriate as determined by the Department.

"Hazardous constituents," for the purposes of this permit, are those substances listed in ADEM Admin. Code r. 335-14-2-Appendix VIII and/or ADEM Admin. Code r. 335-14-5-Appendix IX and include hazardous constituents released from solid waste, hazardous waste, and hazardous waste constituents that are reaction by-products.

"Land Use Controls," for the purposes of this permit, is as defined by ADEM Admin. Code r. 335-5-1-.03.

"Method detection limit" (MDL), for the purposes of this permit, means the minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

"Mixed waste," for the purposes of this permit, means a solid waste that is a mixture of hazardous waste (as defined in ADEM Admin. Code r. 335-14-2-.01(3)) and radioactive waste (as defined in 10 CFR 61.2). The radioactive component of mixed waste is subject to regulation by the Atomic Energy Act (AEA)/Nuclear Regulatory Commission (NRC). The non-radioactive chemically hazardous component of mixed waste is subject to regulation by the AHWMA and ADEM Admin. Code r. 335-14.

"Operating day," for the purposes of this permit, means any day on which hazardous waste is treated, stored, or disposed of in a unit. For example, each day that a hazardous waste storage unit contains hazardous waste is an operating day; as is each day that a disposal unit contains or receives hazardous waste, or each day that hazardous waste is treated in a treatment unit.

"Release," for the purposes of this permit, includes any spilling, leaking, pouring, emitting, emptying, discharging, injecting, escaping, leaching, pumping, or disposing into the environment of any hazardous waste or hazardous constituent.

"Solid waste management unit" (SWMU), for the purposes of this permit, includes any unit that has been used for the treatment, storage or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste. RCRA-regulated hazardous waste management units are also solid waste management units. SWMUs include areas that have been contaminated by routine and systematic releases of hazardous waste or hazardous constituents, excluding one-time accidental spills that are immediately remediated and cannot be linked to solid waste management activities (*e.g.*, product or process spills).

"Storm event," for the purposes of this permit, is defined as a 1-year, 24-hour storm event or rainfall that measures 1-inch or greater in 1 hour or less. Rainfall measurements may be taken at the site, or the closest official weather monitoring station may be used.

I.E. EXPIRATION AND CONTINUATION OF PERMIT

This permit and all conditions herein will remain in effect beyond this permit's expiration date if the Permittee has submitted a new application as required by Permit Condition I.C.2. and, through no fault of the Permittee, the Department has not issued a new permit.

I.F. WASTE MINIMIZATION

1. Certification Requirements

Pursuant to ADEM Admin. Code r. 335-14-5-.05(4)(b)9., the Permittee must certify, no less often than annually, that:

- a. The Permittee has a program in place to reduce the volume and toxicity of hazardous waste to the degree determined by the Permittee to be economically practicable; and,
- b. The proposed method of treatment, storage or disposal is the most practicable method available to the Permittee and that it minimizes the present and future threat to human health and the environment.

2. Recording Requirements

The Permittee shall maintain copies of this certification in the facility operating record as required by ADEM Admin. Code r. 335-14-5-.05(4).

I.G. COST ESTIMATES

1. The Permittee shall maintain detailed written cost estimates, in current dollars, at the location specified in Permit Condition I.C.10.e. and on file with ADEM in accordance with ADEM Admin. Code r. 335-14-5-.08(3), (5), and (10).

2. All cost estimates must be updated annually as required by ADEM Admin. Code r. 335-14-5-.08(3)(b), 335-14-5-.08(5)(b), and 335-14-5-.08(10)(b).
3. The cost estimate shall be maintained and submitted in the form designated by the Department.
4. The Permittee must update the cost estimate no later than 30 calendar days after the Department has approved a modification to the Closure Plan, Post-Closure Plan, or Corrective Action Plan, or any other plan required or referenced by this permit, if the change in the plan results in an increase in the amount of the cost estimate.

I.H. FINANCIAL ASSURANCE

1. The Permittee shall demonstrate continuous compliance with ADEM Admin. Code r. 335-14-5-.08 by providing documentation of financial assurance in at least the amount that equals or exceeds the cost estimate. Changes in financial assurance mechanisms must be approved by the Department.
2. The Permittee shall submit itemized statements for all capital expenditures and a complete, revised post-closure and corrective action cost estimate to the Department when requesting approval for a reduction in the financial assurance mechanism.

I.I. PERMIT MODIFICATIONS

The Permittee shall request a permit modification whenever changes in operating plans or facility design affect any plan (*e.g.*, closure, groundwater monitoring, post-closure, or corrective action) required or referenced by this permit. The Permittee must submit a written request for a permit modification, pursuant to the requirements of ADEM Admin. Code r. 335-14-8-.04(2), at least 60 calendar days prior to the proposed change in the facility design or operation.

I.J. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE DEPARTMENT

One (two for documents required to be placed on public notice) hard copy and one electronic (an optical character recognition or text-searchable) copy of all reports, notifications, or other submissions that are required by this permit should be sent via certified mail or given to:

Chief, Land Division
Alabama Department of Environmental Management
P.O. Box 301463 (Zip 36130-1463)
1400 Coliseum Boulevard (Zip 36110-2059)
Montgomery, Alabama

and

Director, RCRA Division
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street SW Atlanta,
Georgia 30303-3104

PART II
POST-CLOSURE CARE

II.A. POST-CLOSURE CARE PERIOD

The post-closure care period shall extend for a period of thirty (30) years after the date of issuance of a post-closure permit unless shortened or extended pursuant to ADEM Admin. Code r. 335-14-5-.07(8). The post-closure care period shall automatically extend through the end of the compliance period specified in Part III of this permit.

II.B. POST-CLOSURE PROCEDURES AND USE OF PROPERTY

1. Post-Closure Activities

The Permittee shall conduct post-closure care activities, in accordance with Exhibit 5 of the permit application and as required by ADEM Admin. Code r. 335-14-5-.07 and 335-14-5-.14(11)(d), for each hazardous waste management unit listed in Table II.1. Post-closure care shall commence upon the effective date of this permit and shall continue throughout the post-closure care period.

2. Security

The Permittee shall comply with the security provisions of ADEM Admin. Code r. 335-14-5-.02(5) and as described in Section 2.4 of the permit application.

3. Disturbance of Closed Unit(s)

The Permittee shall not allow the disturbance of the integrity of the final cover, liners, any components of the containment system, or the function of the facility's monitoring systems during the post-closure care period for any unit identified in Table II.1.

4. The Permittee shall:

- a. Maintain the integrity and effectiveness of the landfills' final cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion, or other events;
- b. Maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of ADEM Admin. Code r. 335-14-5-.06 and Part III of this permit;
- c. Prevent run-on and run-off from eroding or otherwise damaging the final cover; and,
- d. Protect and maintain surveyed benchmarks used in complying with the surveying and recordkeeping requirements of ADEM Admin. Code r. 335-14-5-.14(10).

II.C. INSPECTIONS

1. The Permittee shall inspect the components, structures, and equipment at the site in accordance with the inspection schedule as described in Section 2.5 of the permit application, the post-closure care plan as described in Exhibit 5 of the permit application, and as required by ADEM Admin. Code r. 335-14-5-.07.

2. Monitoring and Inspection

The Permittee shall inspect the closed hazardous waste management unit listed in Table II.1 at least quarterly and after storms to detect any evidence of deterioration or improper operation as described in Section 2.5 of the permit application and as required under ADEM Admin. Code r. 335-14-5-.07 and 335-14-5-.14. The inspections shall specifically include evaluation of the following items:

- a. Integrity of the final cover (erosion, ponding, subsidence, cracking, *etc.*);
- b. Growth and stabilization of vegetative cover;
- c. Run-on and run-off control system;
- d. Groundwater monitoring wells; and,
- e. Survey benchmarks.

TABLE II.1
POST-CLOSURE CARE UNITS

| UNIT NAME | UNIT DESCRIPTION | CLOSED-IN-PLACE CAPACITY (QUANTITY) | DESCRIPTION OF UNIT* | LOCATION OF UNIT* |
|-----------|----------------------------|-------------------------------------|----------------------|-------------------|
| SWMU 1 | Closed Surface Impoundment | ** | Section 1.1 | Exhibit 2 |

- * Location in permit application containing description (text) and location (figure) of unit.
- ** The Closed in place capacity of the surface impoundment closed as a landfill is unknown

PART III

GROUNDWATER MONITORING AND CORRECTIVE ACTION

III.A. REQUIRED PROGRAM(S)

1. Groundwater monitoring shall consist of the General Groundwater Monitoring Program of Permit Condition III.B. and the Corrective Action Monitoring Program contained in Permit Condition III.E.
2. The Permittee shall continue groundwater monitoring as required by this permit not later than 120 calendar days after the effective date of this permit.

III.B. GENERAL GROUNDWATER MONITORING PROGRAM

1. Well Location, Installation and Construction

The Permittee shall install and/or maintain a groundwater monitoring system to comply with the requirements of ADEM Admin. Code r. 335-14-5-.06(8), 335-14-5-.06(9), 335-14-5-.06(10), and 335-14-5-.06(11) as applicable and as specified below:

- a. The Permittee shall maintain all groundwater monitoring wells at the facility as identified in Table III.1. of this permit, at the locations specified in Exhibit 2 of the permit application, and any other groundwater monitoring wells specified by Permit Condition III.B.1.d.
 - i. All groundwater monitoring wells shall be maintained in accordance with the plans and specifications presented in Exhibit 5 of the permit application and/or CMI Plan, and in accordance with ADEM Admin. Code r. 335-14-5-.06.
 - ii. A groundwater monitoring well shall not be removed from any monitoring program specified in this permit without an approved permit modification pursuant to Permit Condition III.I.
 - iii. If a groundwater monitoring well is damaged, the Permittee shall immediately notify the Department in writing, which includes a description of the well repair activities to be conducted. The well repair procedures must be approved by the Department prior to implementation. Within 30 calendar days after the well is repaired, the Permittee shall submit a written notification to the Department that the well repair activities were conducted in accordance with the approved procedures.
 - iv. If a groundwater monitoring well is deleted from the monitoring program(s) required by this permit in accordance with Permit Conditions III.B.1.a.ii. and I.I., it shall be abandoned within 90 calendar days after deletion using procedures to be approved by the Department. Within 30 calendar days after the well is abandoned, the Permittee shall submit a

written notification to the Department that the well abandonment activities were conducted in accordance with the approved procedures.

- b. Groundwater monitoring wells MW-2A, MW-3A, and MW-4AR shall define the point of compliance for the surface impoundment (SWMU #1) closed as a landfill
- c. The Permittee shall maintain groundwater monitoring well(s) MW-1A as the background monitoring well(s) for the entire facility as specified in Exhibit 2 of the permit application.
- d. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with ADEM Admin. Code r. 335-14-5-.06(6), 335-14-5-.06(8), 335-14-5-.06(9), 335-14-5-.06(10), and 335-14-5-.06(11), as applicable. A plan in the form of a permit modification request specifying the design, location and installation of any additional monitoring wells should be submitted to the Department at least 90 calendar days prior to installation which, at a minimum, shall include:
 - i. Well construction techniques including casing depths and proposed total depth of well(s);
 - ii. Well development method(s);
 - iii. A complete description of well construction materials;
 - iv. A schedule of implementation for construction; and,
 - v. Provisions for determining the lithologic characteristics, hydraulic conductivity, grain size distribution, and porosity for the applicable aquifer unit(s) at the location of the new well(s).

2. General Groundwater Monitoring Requirements

- a. The Permittee shall determine the groundwater surface elevation from all monitoring wells listed in Table III.1. of this permit at least semi-annually and each time a sampling event is conducted. The results of these determinations should be submitted in accordance with Permit Condition III.B.6. Elevation data should be recorded and reported as mean sea level (MSL) and referenced to an appropriate national geodetic vertical datum (NGVD) benchmark.
- b. The Permittee shall determine the groundwater flow rate and direction in the underlying aquifer(s) at least annually and submit the results in accordance with Permit Condition III.B.6.
- c. [Reserved]

3. Groundwater Protection Standard

- a. The groundwater protection standard, as required under ADEM Admin. Code r. 335-14-5-.06(3), shall consist of Table III.3 of this permit which lists the hazardous constituents and their respective concentration limits.
- b. The groundwater protection standard applies to all hazardous waste or hazardous constituent releases as deemed appropriate by the Department to protect human health and the environment.

4. Compliance Period

- a. The compliance period, during which the groundwater protection standard specified in Permit Condition III.B.3. applies, shall begin at the time of the first sampling event of the compliance monitoring program (Permit Condition III.D.), or the corrective action monitoring program (Permit Condition III.E.), whichever is earlier.
- b. The compliance period shall continue (after beginning pursuant to Permit Condition III.B.4.a.) until the groundwater protection standard as defined by Permit Condition III.B.3.a. has not been exceeded for a period of three consecutive years.
- c. If the Permittee is engaged in a corrective action program pursuant to Permit Condition III.E., then the compliance period shall continue as required by ADEM Admin. Code r. 335-14-5-.06(7)(c) until the groundwater protection standard has not been exceeded for a period of three consecutive years after corrective action has been terminated and this permit has been modified, in accordance with Permit Condition III.I., to implement a compliance monitoring program pursuant to Permit Condition III.D. or a detection monitoring program pursuant to Permit Condition III.C., as required by ADEM Admin. Code r. 335-14-5-.06(11)(f).

5. Sampling and Analysis Procedures

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Permit Condition III.B.1. to provide a reliable indication of the quality of the groundwater as required under ADEM Admin. Code r. 335-14-5-.06(8)(d), (e), and (g):

- a. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in Exhibit 14 of the permit application.
- b. Samples shall be analyzed according to the procedures specified in Exhibit 14 of the permit application, the most recent edition of SW-846 or other appropriate methods approved by the Department. Analytical method detection limits shall be less than or equal to the concentration limits specified in Table III.2 or III.3, unless otherwise approved in writing by the Department.

- c. Samples shall be tracked and controlled using the chain-of-custody procedures specified in Exhibit 14 of the permit application.
 - d. Statistical analyses used to evaluate the groundwater monitoring data shall be as described in Exhibit 28 of the permit application and ADEM Admin. Code r. 335-14-5-.06(8)(h).
 - e. All samples collected in accordance with this permit shall not be filtered prior to analysis.
6. Recordkeeping and Reporting
- a. The Permittee shall keep and maintain all monitoring, testing, and analytical data obtained in accordance with Permit Conditions III.B., III.C., III.D., and III.E. as required by Permit Condition I.C.10.
 - b. The Permittee shall submit to the Department a written report to include all analytical sampling data, established background values, statistical evaluations, groundwater elevations, associated potentiometric maps, and the annual groundwater flow rate and direction determinations. The analytical method and the method detection limit (MDL) for each constituent must be integrated into all reports of analysis. The report shall be submitted within 60 calendar days after the first sampling event and on an annual basis thereafter. Copies of this report shall be kept at the facility in accordance with Permit Conditions I.C.10.c. and I.C.10.e. The requirements of this condition may be incorporated into the effectiveness reports required by Permit Condition III.E.4.a during the corrective action period.
 - c. The Permittee shall submit progress reports to the Department describing implementation of groundwater monitoring and/or corrective action activities at the site as required by Part III of this permit on a quarterly basis. The first progress report shall be submitted to the Department within 90 calendar days after the effective date of this permit. The progress reports shall continue until such time as the required monitoring and/or corrective action systems and activities required by this permit are fully constructed and operational. In the event that additional monitoring and/or corrective action requirements are imposed through a permit modification, in accordance with Permit Condition I.I. the quarterly reporting requirement shall resume, commencing upon the effective date of the permit modification and continuing until the required monitoring and/or corrective action systems and activities are again fully constructed and operational.

III.C. DETECTION MONITORING PROGRAM (RESERVED)

III.D. COMPLIANCE MONITORING PROGRAM (RESERVED)

III.E. CORRECTIVE ACTION MONITORING PROGRAM

The requirements of this Condition are applicable to the entire facility. Except as specified otherwise in this permit, the Corrective Action Monitoring Program shall be implemented in accordance with Exhibit 5 of the permit application and ADEM Admin. Code r. 335-14-5-.06(11).

1. Monitoring Systems

In addition to the point of compliance and background monitoring well systems identified in Permit Conditions III.B.1.b. and III.B.1.c., the Permittee shall:

- a. Maintain groundwater monitoring wells MW-10, P-1R, P-6, and TP-9 as boundary wells for the entire facility as specified in Table III.1. of this permit and as shown in Exhibit 2 of the permit application.
- b. Maintain groundwater monitoring wells P-2 and MW-8R as effectiveness wells as specified in Table III.1. of this permit and as shown in Exhibit 2 of the permit application.
- c. Maintain wells RW-1, RW-2, RW-3, RW-4, RW-5, RW-6, RW-7, RW-8, RW-9, RW-10, RW-11, RW-12, RW-13, RW-14, RW-15, RW-16, RW-17, RW-18, RW-19, RW-20, RW-21, RW-22, RW-23, RW-24, DNAPL-1, and DNAPL-2 as recovery wells as specified in Table III.1. of this permit and as shown in Exhibit 2 of the permit application.
- d. Maintain wells MW-2A, MW-3A, and MW-4AR as point of compliance wells as specified in Table III.1. of this permit and as shown on Figure WELL Exhibit 2 of the permit application.

2. Corrective Action Program

- a. The Permittee shall conduct a Corrective Action Program, as described in Exhibit 28 of the permit application, to remove or treat in place all hazardous constituents that exceed their respective groundwater protection standards as described in Table III.3. of this permit at the point of compliance, between the point of compliance and the down-gradient facility property boundary, and beyond the facility boundary in accordance with ADEM Admin. Code r. 335-14-5-.06(11)(e)2.
- b. Pursuant to ADEM Admin. Code r. 335-14-5-.06(11)(c) and 335-14-5-.06(11)(e)3., the Permittee shall continue to implement the corrective action program as described in Exhibit 28 of the permit application within 120 calendar days after the effective date of this permit.
- c. The Permittee shall handle or treat groundwater in accordance with Exhibit 28 of the permit application and with the applicable requirements of NPDES and SID permit number(s) AL0059943 and IU330200027, as issued by the Department.

3. Monitoring Requirements

In addition to the general groundwater monitoring requirements specified in Permit Condition III.B.2., the Permittee shall:

- a. Sample all point of compliance and effectiveness monitoring wells shown in Table III.1. of this permit and analyze for the constituents listed in Table III.2. of this permit on a semi-annual basis beginning within 120 calendar days of the effective date of this permit and continuing through the end of the compliance period.
- b. Sample all point of compliance, effectiveness, and boundary monitoring wells shown in Table III.1. of this permit and analyze for the constituents listed in Table III.3. of this permit on an annual basis beginning within 120 calendar days of the effective date of this permit and continuing through the end of the compliance period.
- c. Sample all background, point of compliance, effectiveness, and boundary monitoring wells shown in Table III.1. of this permit and analyze for temperature (degrees F or C), specific conductance (Mhos/cm), and pH (standard units) each time the well is sampled. The data obtained should be submitted as raw data in the reports required by Permit Condition III.B.6.
- d. When evaluating the monitoring results to determine the effectiveness of the corrective measures, in accordance with Permit Condition III.E.4., the Permittee shall:
 - i. Determine if the corrective action system effectively addresses the entire plume of contamination;
 - ii. Determine if the concentration of the hazardous constituents are decreasing (pH increasing or decreasing toward neutrality, as applicable) in the effectiveness wells specified in Permit Condition III.A.1.;
 - iii. Determine if hazardous waste or hazardous constituents are being released into the environment; and,
 - iv. Determine if hazardous constituents have been detected in the boundary wells specified in Permit Condition III.A.1.

4. Reporting and Response Requirements

In addition to the recordkeeping and reporting requirements specified in Permit Condition III.B.6.:

- a. The Permittee shall report the effectiveness of the corrective action program annually, as required under ADEM Admin. Code r. 335-14-5-.06(11)(g). These reports shall be submitted to the Department within 60 calendar days of each annual anniversary of this permit after corrective action is initiated and continue until corrective action is completed. The Permittee must provide data from groundwater monitoring along with an analysis of that data and any conclusions

regarding the effectiveness of the program in accordance with Permit Condition III.E.3.d. If the analysis of the data warrants any change to the corrective action program, the Permittee must include these revisions in the annual report, which will be followed-up within 90 calendar days with an application for permit modification in accordance with Permit Condition I.I.

- b. If corrective action is terminated under Permit Condition III.B.4.c., the Permittee must sample all background, point of compliance, effectiveness and boundary sampling locations for the compounds listed in ADEM Admin. Code r. 335-14-5-Appendix IX. Based upon the sampling results, the Permittee may petition the Department, in accordance with Permit Condition I.I., for a permit modification to implement either a detection monitoring program or a compliance monitoring program.

TABLE III.1
MONITORING WELL DESIGNATIONS

| WELL NUMBER | WELL TYPE * | WELL LATITUDE | WELL LONGITUDE | UNIT(S) MONITORED | WELL DEPTH (ft) | GROUND ELEVATION (ft. MSL) | TOP-OF-RISER ELEVATION (ft. MSL) | SCREENED INTERVAL (ft. MSL) | MONITORED ZONE |
|-------------|-------------|---------------|----------------|-------------------|-----------------|----------------------------|----------------------------------|-----------------------------|----------------|
| MW-1 | PGM | 30°53.435' N | 87°45.331' W | Landfill | 124 | 243.60 | 244.99 | Est 121 - 131 | Lower |
| MW-1A | BKG | 30°53.461' N | 87°45.363' W | Landfill | 20.5 | 245.10 | 246.14 | 225.64 - 235.64 | Upper |
| MW-2A | POC | 30°53.559' N | 87°45.405' W | Landfill | 13.5 | 217.90 | 219.52 | 206.02 - 216.02 | Upper |
| MW-3A | POC | 30°53.568' N | 87°45.354' W | Landfill | 13.5 | 216.60 | 217.75 | 204.25 - 214.25 | Upper |
| MW-4AR | POC | 30°53.542' N | 87°45.346' W | Landfill | 19 | 221.89 | 224.47 | 205.47 - 215.47 | Upper |
| MW-5 | PGM | 30°53.758' N | 87°45.274' W | Landfill | 10 | 214.90 | 217.52 | 207.52 - 212.52 | Upper |
| MW-6 | PGM | 30°53.660' N | 87°45.250' W | Landfill | 15 | 214.10 | 216.46 | 201.46 - 206.46 | Upper |
| MW-7 | PGM | 30°53.596' N | 87°45.220' W | Landfill | 15 | 217.00 | 219.76 | 204.76 - 209.76 | Upper |
| MW-8R | EFF | 30°53.627' N | 87°45.338' W | Landfill | 15 | 206.00 | 207.90 | 192.90 - 202.90 | Upper |
| MW-10 | BDY | 30°53.630' N | 87°45.340' W | Landfill | 83.5 | 206.20 | 209.66 | 126.16 - 136.16 | Lower |
| MW-11 | PGM | 30°53.627' N | 87°45.373' W | Landfill | 63 | 214.60 | 216.50 | 153.50 - 163.05 | Lower |
| MW-12 | PGM | 30°53.660' N | 87°45.250' W | Landfill | 58 | 214.30 | 215.25 | 157.25 - 167.25 | Lower |
| P-1R | BDY | 30°53.658' N | 87°45.355' W | Landfill | 9 | 205.16 | 207.89 | 198.89 - 203.89 | Upper |
| P-2 | EFF | 30°53.678' N | 87°45.325' W | Landfill | 16.5 | 200.70 | 203.34 | 186.84 - 191.84 | Upper |
| P-3 | PGM | 30°53.676' N | 87°45.308' W | Landfill | 12 | 201.40 | 204.85 | 192.85 - 197.85 | Upper |
| P-4 | PGM | 30°53.675' N | 87°45.281' W | Landfill | 10 | 204.30 | 206.82 | 196.82 - 201.82 | Upper |
| P-5 | PGM | 30°53.626' N | 87°45.374' W | Landfill | 8 | 215.40 | 216.99 | 208.99 - 213.99 | Upper |
| P-6 | BDY | 30°53.619' N | 87°45.315' W | Landfill | 15.8 | 205.60 | 206.45 | 190.65 - 195.65 | Upper |
| TP-9 | BDY | 30°53.715' N | 87°45.336' W | Landfill | 15 | 197.20 | 199.92 | 184.92 - 187.92 | Upper |
| RW-1 | REC | 30°53.532' N | 87°45.343' W | Landfill | 22.5 | 221.97 | 224.37 | 201.87 - 211.87 | Upper |
| RW-2 | REC | 30°53.536' N | 87°45.344' W | Landfill | 22.5 | 222.72 | 225.12 | 202.62 - 212.62 | Upper |
| RW-3 | REC | 30°53.538' N | 87°45.345' W | Landfill | 22.5 | 223.00 | 225.40 | 202.90 - 212.90 | Upper |
| RW-4 | REC | 30°53.541' N | 87°45.346' W | Landfill | 22.5 | 222.42 | 224.82 | 202.32 - 212.32 | Upper |
| RW-5 | REC | 30°53.544' N | 87°45.348' W | Landfill | 22.5 | 222.93 | 225.33 | 202.83 - 212.83 | Upper |
| RW-6 | REC | 30°53.547' N | 87°45.350' W | Landfill | 22.5 | 222.45 | 224.85 | 202.35 - 212.35 | Upper |
| RW-7 | REC | 30°53.548' N | 87°45.351' W | Landfill | 22.5 | 222.32 | 224.72 | 202.22 - 212.22 | Upper |
| RW-8 | REC | 30°53.552' N | 87°45.353' W | Landfill | 22.5 | 222.17 | 224.57 | 202.07 - 212.07 | Upper |
| RW-9 | REC | 30°53.554' N | 87°45.357' W | Landfill | 22.5 | 222.65 | 225.05 | 202.55 - 212.55 | Upper |
| RW-10 | REC | 30°53.555' N | 87°45.358' W | Landfill | 22.5 | 222.19 | 224.59 | 202.09 - 212.09 | Upper |
| RW-11 | REC | 30°53.558' N | 87°45.359' W | Landfill | 22.5 | 222.16 | 224.56 | 202.06 - 212.06 | Upper |
| RW-12 | REC | 30°53.560' N | 87°45.360' W | Landfill | 22.5 | 222.40 | 224.80 | 202.30 - 212.30 | Upper |
| RW-13 | REC | 30°53.560' N | 87°45.362' W | Landfill | 22.5 | 222.18 | 224.58 | 202.08 - 212.08 | Upper |
| RW-14 | REC | 30°53.561' N | 87°45.363' W | Landfill | 22.5 | 222.38 | 224.78 | 202.28 - 212.28 | Upper |
| RW-15 | REC | 30°53.562' N | 87°45.368' W | Landfill | 22.5 | 222.00 | 224.40 | 201.90 - 211.90 | Upper |
| RW-16 | REC | 30°53.562' N | 87°45.373' W | Landfill | 22.5 | 222.08 | 224.48 | 201.98 - 211.98 | Upper |
| RW-17 | REC | 30°53.562' N | 87°45.382' W | Landfill | 22.5 | 222.17 | 224.57 | 202.07 - 212.07 | Upper |
| RW-18 | REC | 30°53.561' N | 87°45.386' W | Landfill | 22.5 | 221.42 | 223.82 | 201.32 - 211.32 | Upper |
| RW-19 | REC | 30°53.560' N | 87°45.389' W | Landfill | 22.5 | 221.84 | 224.24 | 201.74 - 211.74 | Upper |
| RW-20 | REC | 30°53.558' N | 87°45.393' W | Landfill | 22.5 | 222.71 | 225.11 | 202.61 - 212.61 | Upper |
| RW-21 | REC | 30°53.557' N | 87°45.397' W | Landfill | 22.5 | 222.64 | 225.04 | 202.54 - 212.54 | Upper |
| RW-22 | REC | 30°53.555' N | 87°45.400' W | Landfill | 22.5 | 222.08 | 224.48 | 201.98 - 211.98 | Upper |
| RW-23 | REC | 30°53.523' N | 87°45.337' W | Landfill | 22.5 | 222.00 | 224.40 | 201.90 - 211.90 | Upper |
| RW-24 | REC | 30°53.672' N | 87°45.323' W | Landfill | 15 | Est 201 | Est 203 | Est 188 - 198 | Upper |
| DNAPL-1 | REC | 30°53.583' N | 87°45.346' W | Landfill | 15 | Est 207 | Est 209 | Est 194 - 204 | Upper |
| DNAPL-2 | REC | 30°53.621' N | 87°45.345' W | Landfill | 12.5 | Est 206 | Est 208.5 | Est 196 - 206 | Upper |

* Well Type:

POC - Point of Compliance Wells

EFF - Effectiveness Monitoring Wells

PGM - Piezometers and/or General Monitoring Wells

BKG - Background Wells

BDY - Boundary Monitoring Wells

UPG - Upgradient Well

REC - Recovery Well

TRN - Trench Well

TABLE III.2
GROUNDWATER QUALITY MONITORING CONSTITUENTS¹

| HAZARDOUS CONSTITUENT |
|------------------------------|
| Phenol |
| 2-chlorophenol |
| 2,4-dimethylphenol |
| p-chloro-m-cresol |
| Naphthalene |
| 2,4-dinitrophenol |
| Acenaphthylene |
| Trichlorophenols |
| Fluoranthene |
| Benzo(a)anthracene |
| Chrysene |
| Benzo(b)fluoranthene |
| Tetrachlorophenols |
| Pentachlorophenol |
| Benzo(a)pyrene |
| Indeno(1,2,3-cd)pyrene |
| Dibenz(a,h)anthracene |
| Fluorene |
| Acenaphthene |
| Carbazole ² |
| Phenanthrene ² |

¹ The constituents listed herein are the subset of the Groundwater Protection Standard listed in Table III.3 for which monitoring is required.

² In analyzing Phenanthrene and Carbazole; if these constituents are present between 1.4:1 and 5:1, respectively, it shall be considered that Creosote is present.

TABLE III.3
GROUNDWATER PROTECTION STANDARD

| HAZARDOUS CONSTITUENT | UNIT* | CONCENTRATION LIMIT (µg/L) |
|------------------------|----------|----------------------------|
| Phenol | Landfill | 580.0 |
| 2-chlorophenol | Landfill | 9.1 |
| 2,4-dimethylphenol | Landfill | 36.0 |
| p-chloro-m-cresol | Landfill | 140.0 |
| Naphthalene | Landfill | 0.17 |
| 2,4-dinitrophenol | Landfill | 3.9 |
| Acenaphthylene | Landfill | 46.9**** |
| Trichlorophenols | Landfill | 1.2 |
| Fluoranthene | Landfill | 80.0 |
| Benzo(a)anthracene | Landfill | 0.034 |
| Chrysene | Landfill | 3.4 |
| Benzo(b)fluoranthene | Landfill | 0.034 |
| Tetrachlorophenols | Landfill | 24.0 |
| Pentachlorophenol | Landfill | 1.0** |
| Benzo(a)pyrene | Landfill | 0.2** |
| Indeno(1,2,3-cd)pyrene | Landfill | .034 |
| Dibenz(a,h)anthracene | Landfill | 0.0034 |
| Fluorene | Landfill | 29.0 |
| Acenaphthene | Landfill | 53.0 |
| Carbazole*** | Landfill | 3.4 |
| Phenanthrene*** | Landfill | 46.9**** |
| Creosote*** | Landfill | See*** |

* Identifies the unit(s) at which the given constituent must be monitored.

** MCL

*** In analyzing Phenanthrene and Carbazole; if these constituents are present between 1.4:1 and 5:1, respectively, it shall be considered that Creosote is present.

**** ARBCA Appendix B RM-1 calculated value

Note: Concentration Limits taken from May 2014 EPA Regional Screening Level Master Table unless noted otherwise.

PART IV

**SOLID WASTE MANAGEMENT UNIT
IDENTIFICATION AND EVALUATION**

IV.A. APPLICABILITY

The Conditions of this Part apply to:

1. The solid waste management units (SWMUs) and areas of concern (AOCs) identified in Table IV.1, which require investigation and/or remediation;
2. The SWMUs identified in Table IV.2, which require no further action under this permit at this time;
3. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means; and,
4. Contamination beyond the facility boundary, if applicable. The Permittee shall implement corrective actions beyond the facility boundary where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Department that, despite the Permittee's best efforts, as determined by the Department, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. Assurances of financial responsibility for completion of such off-site corrective action will be required.

**IV.B. NOTIFICATION AND ASSESSMENT REQUIREMENTS FOR NEWLY IDENTIFIED
SWMUs AND AOCs**

1. The Permittee shall notify the Department in writing, within 15 calendar days of discovery, of any additional AOC(s) as described under Permit Condition IV.A.3. The notification shall include, at a minimum, the location of the AOC(s) and all available information pertaining to the nature of the release (*e.g.*, media affected, hazardous constituents released, magnitude of release, *etc.*). If the Department determines that further investigation of an AOC is required, the permit will be modified in accordance with ADEM Admin. Code r. 335-14-8-.04(2).
2. The Permittee shall notify the Department in writing, within 15 calendar days of discovery, of any additional SWMUs as described under Permit Condition IV.A.3.
3. The Permittee shall prepare and submit to the Department, within 90 calendar days of notification, a SWMU Assessment Report (SAR) for each SWMU identified under Permit Condition IV.B.2. At a minimum, the SAR shall provide the following information:

- a. Location of unit(s) on a topographic map of appropriate scale such as required under ADEM Admin. Code r. 335-14-8-.02(5)(b)19.
 - b. Designation of type and function of unit(s).
 - c. General dimensions, capacities and structural description of unit(s) (supply any available plans/drawings).
 - d. Dates that the unit(s) was operated.
 - e. Specification of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes.
 - f. All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (to include groundwater data, soil analyses, air, and/or surface water data).
4. Based upon the results of the SAR, the Department shall determine the need for further investigations at the SWMUs covered in the SAR. If the Department determines that such investigations are needed, the Permittee shall initiate an investigation as outlined in Permit Condition IV.D.1 immediately upon receiving notification of the Department's determination.

IV.C. NOTIFICATION REQUIREMENTS FOR NEWLY DISCOVERED RELEASES AT PREVIOUSLY IDENTIFIED SWMUs or AOCs

1. The Permittee shall notify the Department in writing of any newly discovered release(s) of hazardous waste or hazardous constituents discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, within 15 calendar days of discovery. Such newly discovered releases may be from SWMUs or AOCs identified in Permit Condition IV.A.2 or SWMUs or AOCs identified in Permit Condition IV.A.3 for which further investigation was not required.
2. If the Department determines that further investigation of the SWMUs or AOCs is needed, the Permittee shall initiate an investigation as outlined in Permit Condition IV.D.1 immediately upon receiving notification of the Department's determination.

IV.D. RCRA FACILITY INVESTIGATION (RFI)

1. The Permittee must perform an RFI for any SWMU and AOC identified by the Department in accordance with Permit Conditions IV.A.1, IV.B.4, and IV.C.2.
2. The RFI must completely identify the concentration of hazardous constituents released from each SWMU and AOC and fully delineate the area where such hazardous constituents have come to be located.
3. The RFI must fully characterize the nature and extent of contamination released from each SWMU or AOC under investigation.

4. The RFI must be performed in a manner consistent with the most recent edition of the Alabama Environmental Investigation and Remediation Guidance (AEIRG).
5. Except as provided by Permit Condition IV.D.6., the RFI must be completed within 180 calendar days from the effective date of this permit or, for SWMUs or AOCs identified pursuant to Permit Condition IV.B. and C., within 180 calendar days from the receipt of notification from the Department that an RFI is required. If, prior to the effective date of this permit, the Department has approved a work plan that includes a schedule for completing the RFI, the RFI shall be completed in accordance with the approved schedule.
6. RFI Schedule of Compliance
 - a. For RFIs expected to require greater than 180 calendar days to complete, the Permittee may submit a schedule of compliance subject to Departmental approval and/or modification.
 - b. Submittal of an RFI Schedule of Compliance does not delay or otherwise postpone the Permittee's obligation to initiate the RFI.
 - c. The Schedule of Compliance must include:
 - i. A detailed narrative discussion, which explains why the RFI cannot be completed within 180 days; and,
 - ii. A detailed and chronological listing of milestones with estimated durations that provides sufficient information to track the progress of the investigation.
 - d. The RFI Schedule of Compliance shall be reviewed by the Department in accordance with Permit Condition IV.G.
 - e. The Permittee shall complete the RFI in accordance with the approved RFI Schedule of Compliance.
7. RFI Progress Reports
 - a. For an RFI being conducted in accordance with the approved RFI Schedule of Compliance, the Permittee must submit progress reports on a monthly basis.
 - b. The RFI Progress Reports must include:
 - i. A description of the RFI activities completed during the reporting period;
 - ii. Summaries of any problems or potential problems encountered during the reporting period;
 - iii. Actions taken to rectify problems;
 - iv. Changes in relevant personnel;

- v. Projected work for the next reporting period;
 - vi. Any proposed revisions to the RFI Schedule of Compliance. Modifications of the RFI Schedule of Compliance are subject to approval by the Department; and,
 - vii. A summary of any data collected during the reporting period, including:
 - A. The location of each sampling point identified on a site map;
 - B. The concentration of each hazardous constituent detected at each sampling point; and,
 - C. Submittal of RFI Progress Reports, work plans, or other documents during the RFI does not alter the approved RFI Schedule of Compliance.
8. RFI Reports
- a. The Permittee shall prepare and submit to the Department an RFI Report within 60 calendar days from the completion of investigation activities in accordance with the approved RFI Schedule of Compliance, if applicable.
 - b. The RFI Report must provide a detailed description of all required elements of the investigation as described in the most recent edition of the AEIRG.
 - c. The RFI Report shall be reviewed by the Department in accordance with Permit Condition IV.G.

IV.E. SELECTION OF CORRECTIVE MEASURES AND PERMIT MODIFICATION

- 1. The Permittee shall develop and submit to the Department a Corrective Measures Implementation (CMI) Plan for any areas of the Permittee's site where hazardous constituents have come to be located at concentrations exceeding those appropriate for the protection of human health and the environment. The CMI Plan must include all applicable elements of the proposed remedy pursuant to the most recent edition of the AEIRG.
- 2. The CMI Plan shall be submitted to the Department within 120 calendar days following the Permittee's submittal of the RFI Report indicating that hazardous constituents have come to be located at any area of the Permittee's facility, or beyond the facility, at concentrations exceeding those appropriate for the protection of human health and the environment, or within 120 calendar days following notification from the Department that a CMI Plan is required, whichever occurs earlier.
- 3. The CMI Plan shall be submitted along with a request for permit modification pursuant to ADEM Admin. Code r. 335-14-8-.04(2), and shall include any applicable fees pursuant to ADEM Admin. Code r. 335-1-6. This modification will serve to incorporate the proposed final remedy, including all procedures necessary to implement and monitor the remedy, into this permit.

4. Within 120 calendar days after this Permit has been modified in accordance with Permit Condition IV.E.3., the Permittee shall demonstrate financial assurance for completing the approved remedy.

IV.F. INTERIM MEASURES (IM)

1. IM Work Plan(s)
 - a. Upon notification by the Department, the Permittee shall prepare and submit an Interim Measures (IM) Work Plan for any SWMU or AOC that the Department determines is necessary. IM are necessary in order to minimize or prevent further migration of contaminants and limit human and environmental exposure to contaminants while long-term corrective measures are evaluated and, if necessary, implemented. The IM Work Plan shall be submitted within 30 calendar days of such notification and shall include the elements listed in Permit Condition IV.F.1.b. Such IM may be conducted concurrently with investigations required under the terms of this permit. The Permittee may initiate IM by submitting an IM Work Plan for approval and reporting in accordance with the requirements under Permit Condition IV.F.
 - b. The IM Work Plan shall ensure that the IM are designed to mitigate any current or potential threat(s) to human health or the environment and is consistent with and integrated into any long-term solution at the facility. The IM Work Plan shall include: the IM objectives, procedures for implementation (including any designs, plans, or specifications), and schedules for implementation.
 - c. The IM Work Plan must be approved by the Department, in writing, prior to implementation. The Department shall specify the start date of the IM Work Plan schedule in the letter approving the IM Work Plan.
 - d. The IM Report shall be reviewed by the Department in accordance with Permit Condition IV.G.
2. IM Implementation
 - a. The Permittee shall implement the IM in accordance with the approved IM Work Plan.
 - b. The Permittee shall give notice to the Department as soon as possible of any planned changes, reductions or additions to the IM Work Plan.
 - c. Final approval of corrective action required under ADEM Admin. Code r. 335-14-5-.06(12), which is achieved through IM, shall be in accordance with ADEM Admin. Code r. 335-14-8-.04(2) and Permit Condition IV.E.
3. IM Reports
 - a. If the time required for completion of IM is greater than one year, the Permittee shall provide the Department with Progress Reports at intervals specified in the

approved work plan. The Progress Reports shall, at a minimum, contain the following information:

- i. A description of the portion of the IM completed;
 - ii. Summaries of any deviations from the IM Work Plan during the reporting period;
 - iii. Summaries of any problems or potential problems encountered during the reporting period;
 - iv. Projected work for the next reporting period; and,
 - v. Copies of laboratory or monitoring data.
- b. The Permittee shall prepare and submit the IM Report to the Department within 90 calendar days of completion of IM conducted under Permit Condition IV.F. The IM Report shall, at a minimum, contain the following information:
- i. A description of IM implemented;
 - ii. Summaries of results;
 - iii. Summaries of all problems encountered;
 - iv. Summaries of accomplishments and/or effectiveness of IM; and,
 - v. Copies of all relevant laboratory or monitoring data, *etc.*, in accordance with Permit Condition I.C.10.

IV.G. SUBMITTALS

1. All work plans, reports, schedules, and other documents ("submittals") required by this permit shall be subject to approval by the Department to assure that such submittals and schedules are consistent with the requirements of this Permit and with applicable regulations and guidance. The Permittee shall revise all submittals and schedules as directed by the Department.
2. The Department will review all submittals in accordance with the conditions of this permit. The Department will notify the Permittee in writing of any submittal that is disapproved, and the basis therefore. If the Department disapproves a submittal, the Department shall: (1) notify the Permittee in writing of the submittal's deficiencies and specify a due date for submission of a revised submittal, (2) revise the submittal and notify the Permittee of the revisions, or (3) conditionally approve the submittal and notify the Permittee of the conditions. Permit Condition IV.H. shall apply only to submittals that have been disapproved and revised by the Department, or that have been disapproved by the Department, then revised and resubmitted by the Permittee, and again disapproved by the Department.

3. All submittals shall be submitted within the time frame specified by the Department and in accordance with the approved schedule of compliance. Extensions of the due date for submittals may be granted by the Department based on the Permittee's demonstration that sufficient justification for the extension exists.
4. All submittals required by this permit shall be signed and certified in accordance with ADEM Admin. Code r. 335-14-8-.02(2).
5. Two (2) copies of all submittals shall be provided by the Permittee to the Department in accordance with Permit Condition I.J.

IV.H. DISPUTE RESOLUTION

Notwithstanding any other provision in this permit, in the event the Permittee disagrees, in whole or in part, with the Department's revision of a submittal or disapproval of any revised submittal required by this Part, the following may, at the Permittee's discretion, apply:

1. In the event that the Permittee chooses to invoke the provisions of this section, the Permittee shall notify the Department in writing within 30 calendar days of receipt of the Department's revision of a submittal or disapproval of a revised submittal. Such notice shall set forth:
 - a. The specific matters in dispute;
 - b. The position the Permittee asserts should be adopted as consistent with the requirements of this permit;
 - c. The basis for the Permittee's position; and,
 - d. Any matters considered necessary for the Department's determination.
2. The Department and the Permittee shall have an additional 30 calendar days from the Department's receipt of the notification provided for in Permit Condition IV.H.1. to meet or confer to resolve any disagreement.
3. In the event agreement is reached, the Permittee shall submit and implement the revised submittal in accordance with and within the time frame specified in such agreement.
4. If agreement is not reached within the 30-day period, the Department will notify the Permittee in writing of the decision on the dispute, and the Permittee shall comply with the terms and conditions of the Department's decision in the dispute. For the purposes of this provision in this permit, the responsibility for making this decision shall not be delegated below the Department's Land Division Chief.
5. With the exception of those conditions under dispute, the Permittee shall proceed to take any action required by those portions of the submission and of this permit that the Department determines are not affected by the dispute.

Table IV.1

The following Solid Waste Management Unit(s) (SWMU) and/or Area(s) of Concern (AOC) numbers and descriptions correspond with those noted in the RCRA Facility Assessment (RFA) Report. Where discrepancies exist, the permit will take precedence.

List of SWMUs and AOCs requiring a RCRA Facility Investigation (RFI) and/or remediation:

| SWMU/AOC NUMBER | SWMU/AOC NAME | UNIT COMMENT | POTENTIALLY AFFECTED MEDIA |
|------------------------|----------------------|---------------------|-----------------------------------|
| | | | |

There are no required RFI activities at this time

Table IV.2

The following Solid Waste Management Unit(s) (SWMU) and/or Area(s) of Concern (AOC) numbers and descriptions correspond with those noted in the RCRA Facility Assessment (RFA) Report. Where discrepancies exist, the permit will take precedence.

List of SWMUs and AOCs requiring no further action at this time:

| SWMU/AOC NUMBER | SWMU/AOC NAME | POTENTIALLY AFFECTED MEDIA |
|------------------------|------------------------------------|-----------------------------------|
| SWMU 11 | Buried Pipe to Surface Impoundment | Soil, groundwater |
| SWMU 12 - 20 | Wastewater Treatment Plant | Soil, groundwater |

Table IV.3

The following Solid Waste Management Unit(s) (SWMU) and/or Area(s) of Concern (AOC) numbers and descriptions correspond with those noted in the RCRA Facility Assessment (RFA) Report. Where discrepancies exist, the permit will take precedence.

List of SWMUs and AOCs regulated by Part II of this permit.

| SWMU/AOC NUMBER | SWMU/AOC NAME | POTENTIALLY AFFECTED MEDIA |
|------------------------|----------------------|-----------------------------------|
| SWMU 1 | Surface Impoundment | Soil, groundwater |

PART V

CORRECTIVE MEASURES IMPLEMENTATION

V.A. APPLICABILITY

The conditions of this Part apply to SWMUs and AOCs identified in Table V.1.

V.B. GENERAL CONDITIONS

1. The Permittee is required to perform corrective measures for the SWMUs and AOCs identified in Condition V.A. The approved remedy for these defined units, waterway areas, or land parcels, includes any and all actions set forth in this permit and in the approved Interim Measures Plans, Corrective Measures Studies (CMSs), and Corrective Measures Implementation (CMI) Plans approved by the Department, as noted below:

| Applicable SWMU/AOC | CMS/CMI | Approval Date |
|---------------------------------|--|---------------|
| SWMU 2-10, 21, 22, 25 and AOC A | Corrective Measures Study revision dated June 15, 2005 | July 18, 2005 |

2. Remedial Cleanup Levels

Upon approval, pursuant to Condition IV.E of the CMI Plan designating applicable cleanup level(s), the cleanup level(s) for the areas specific to the CMI Plan will be deemed to be a condition of this permit.

3. Groundwater Monitoring and Remediation

Where required pursuant to Conditions V.B.1. and V.C. of this permit, the Permittee shall comply with the general groundwater monitoring requirements of Part III of this permit.

4. Land Use Controls

Where required pursuant to Conditions V.B.1. and V.C. of this permit, the Permittee shall establish appropriate land use controls to achieve protection of human health and the environment. The Permittee shall comply with Conditions V.B.5. and V.B.6. of this permit when implementing corrective measures requiring land use controls. In the event an off-site property owner does not allow an environmental covenant to be imposed, the Permittee shall notify the Department within 14 calendar days of receipt of such written notification of the refusal by the off-site property owner. If the property owner does not provide a written refusal of the request to allow an environmental covenant to be imposed, the Permittee shall notify the Department within 14 days of delivery of the request to the off-site property owner. In such cases, the Department may allow the Permittee to propose an alternate area-specific land

use control in accordance with ADEM Admin. Code r. 335-5-1-.02(i), subject to the Department's review and approval.

5. Survey Plat

For corrective measures where residual concentrations of contaminants will remain in-place at levels greater than those appropriate for unrestricted land use, or for corrective measures that rely on land use controls, the Permittee must:

- a. Within 90 calendar days following the effective date of a permit modification addressing remedy selection, submit to the local zoning authority, or the authority with jurisdiction over local land use, and to the Department, a survey plat indicating the location and dimensions of the SWMUs, AOCs, and capped or partially remediated areas with respect to permanently surveyed benchmarks, the locations of sampling points, and the concentrations of hazardous constituents detected. This plat must be prepared and certified by a professional land surveyor registered in the State of Alabama. The plat must be filed with the local zoning authority or the authority with jurisdiction over local land use and must contain a note, prominently displayed, which states the Permittee's obligation to limit the property to the specified restricted uses.
- b. Maintain the survey plat as described in Condition V.B.5.a. of this permit and in the CMS Report until the Permittee has demonstrated, to the satisfaction of the Department, that the levels of hazardous constituents in all contaminated media are within limits appropriate for unrestricted land uses.

6. Environmental Covenant

No later than the submission of the survey plat required in Condition V.B.5., the Permittee must:

- a. Record in the probate judges office of the county in which the property is located or a portion thereof an environmental covenant in accordance with ADEM Admin. Code r. 335-5 that will in perpetuity notify any potential purchaser of the property that:
 - i. The land is contaminated with hazardous constituents in concentrations that exceed unrestricted use standards;
 - ii. The use of the property is restricted by this permit for certain residential, municipal, or industrial purposes and may lead to an increased risk of exposure to hazardous constituents depending upon the activities initiated at the site. Such activities may yield an increased level of human health risk to the owner;

- iii. The potential purchaser or entity that desires to work in the contaminated area should notify the Permittee before mobilizing to the area covered by the land use control.
 - b. Submit to the Department a certification, signed by the Permittee in accordance with Permit Condition I.C.11., that the environmental covenant specified in this part has been performed. This certification must include a copy of the document in which the notation has been placed.
 - c. Maintain the environmental covenant described in Permit Condition V.B.6. until the Permittee has demonstrated, to the satisfaction of the Department, that the levels of hazardous constituents in all contaminated media are within limits appropriate for unrestricted land uses.
7. Security

Security measures, where required by Conditions V.B.1. and V.C. of this permit, will be conducted in accordance with ADEM Admin. Code r. 335-14-5-.02(5) and as prescribed in the approved CMI Plan.
8. Inspection

Where corrective measures addressed in Conditions V.B.1. include provisions to cap in place or partially remediate properties or land areas, whether owned or not owned by the Permittee, the Permittee shall specify inspection protocols on a scheduled basis to ensure continued integrity of the remedy and to ensure that land use remains appropriately restricted per the environmental covenant established pursuant to Permit Condition V.B.6. Inspection provisions shall be as prescribed in the approved CMI Plan

V.C. AREA SPECIFIC CONDITIONS (RESERVED)

V.D. CORRECTIVE MEASURES IMPLEMENTATION (CMI) REPORTS

1. CMI Progress Reports

If the time required to complete implementation of a specific set of corrective measures, as described in the Department-approved CMI Plan, is greater than 180 calendar days, the Permittee shall provide ADEM with progress reports according to the schedule in the ADEM-approved CMI Plan. If no schedule has been approved as part of the associated plan, progress reports shall be submitted at least quarterly. The progress reports shall, at a minimum, contain the following information:

- a. A description of the portion of CMI Plan completed;

- b. Summaries of and deviations from the approved CMI Plan during the reporting period;
- c. Summaries of current and potential problems, including recommended solutions and alternatives as well as corrective actions undertaken;
- d. Any monitoring data (soil, air, dust, water) collected for any reason during the construction period for the purposes of monitoring potential for human and ecological exposure; and,
- e. Projected work for the next period and impacts to the approved schedule.

2. Final CMI Reports

Upon completion of construction of corrective measures systems, implementation of land use controls, interim removal actions, or other short-term activities required by this permit and/or the approved CMI Plan, the Permittee shall submit to the Department a Final CMI Report containing, at a minimum, the following:

- a. A description of activities completed;
- b. For cap and cover remedies, as-built construction drawings presenting the final in-place three-dimensional location of contaminated material. A plan view of the remediated areas shall be presented in addition to a cross section of the in-place capped areas;
- c. Hazardous waste manifests indicating the handling of any excavated material that has been shipped off-site to a Department-approved, certified landfill;
- d. For remedies involving land use controls, a copy of the survey plat and environmental covenant required by Condition V.B. of this permit;
- e. Monitoring data (soil, air, dust, water) collected for any reason during the construction period for the purposes of monitoring potential for human and ecological exposure; and
- f. Certification, prepared in accordance with ADEM Admin. Code r. 335-14-8-02 (2)(d) by the Permittee and an independent professional engineer registered in the State of Alabama, that the corrective measures implementation phase (*i.e.*, construction) required by this permit is complete and that the approved system and/or facilities are ready for operation in accordance with the intended design (*i.e.*, CMI Plan).

3. Corrective Measures (CM) Effectiveness Reports

- a. For corrective measures that have been fully implemented and where the corrective measures system must operate for a period of time to achieve cleanup goals or levels, the Permittee shall submit CM

Effectiveness Reports annually, unless otherwise approved by the Department, beginning 180 calendar days following the Department's approval of the Final CMI Report for the initial Corrective Measures system subject to this permit condition. The overall CM Effectiveness Reports shall include, at a minimum, the following information for each SWMU and/or AOC included in the report:

- i. A detailed narrative presenting an evaluation of the effectiveness of the selected remedy;
- ii. Summaries of compliance with and progress toward achieving cleanup goals;
- iii. Any significant revisions, adjustments, or proposed modifications to the selected remedy;
- iv. Tabulated environmental sampling and monitoring data including, but not limited to, groundwater quality, elevation data, and a graphical representation of all constituents detected during each sampling event from recovery wells, monitoring wells, drinking water wells, and other locations;
- v. Chain of custody, field reports, and laboratory data sheets to include the date of collection, the date the sample was extracted, and the date of sample analysis for samples collected during the reporting period;
- vi. Any monitoring data (soil, air, dust, water) collected for any reason during the post-construction period for the purposes of monitoring potential for human and ecological exposure;
- vii. Isoconcentration maps depicting the distribution of parameters for each sampling event;
- viii. Time versus concentration plots for each monitoring parameter for each recovery well and a representative number of effectiveness wells;
- ix. Tabulated volumetric data on groundwater pumped and pumping rates (monthly and cumulative) for each recovery well;
- x. Records of any groundwater recovery system operation time, including shutdown periods, not including any minor (less than 24 hours) shutdowns for repairs, maintenance, etc.;
- xi. Potentiometric surface maps;
- xii. Description of land use during the reporting period at the designated area requiring corrective measures; and,

- xiii. Findings of the Permittee's investigation into the continued effectiveness of land use controls per Condition V.B.

 - b. If, at any time, the Permittee determines that any remedy selection specified in Condition V.B or V.C. of this permit no longer satisfies the applicable requirements of ADEM Admin. Code r. 335-14-5-.06(12) or this permit for releases of hazardous waste or hazardous constituents originating from SWMUs or AOCs, the Permittee must, within 90 calendar days, submit an application for a permit modification, pursuant to Permit Condition I.I, to make any appropriate changes to the CMI Plan.

 - c. The application for changes in the CMI Plan, including changes in inspection and monitoring provisions of the CMI Plan, shall be submitted as an application for a permit modification pursuant to the requirements of ADEM Admin. Code r. 335-14-8-.04.
4. Final Report of Corrective Measures

Within 90 calendar days following attainment of cleanup levels or goals as outlined in this Permit and the approved CMI Plan, the Permittee shall submit to the Department a Final Report of Corrective Measures (FRCM). The FRCM shall contain a certification by the Permittee and an Alabama-registered independent professional engineer that all remedial measures required by this permit and the approved CMI Plan have been completed. The FRCM shall outline any procedures and schedules for dismantling of corrective measures systems, groundwater monitoring or recovery systems, removal of land use controls, and any other remedial systems or controls required by this permit or the approved CMI Plan.

Table V.1.

The following Solid Waste Management Unit(s) (SWMUs) and/or Area(s) of Concern (AOCs) numbers and descriptions correspond with those noted in the RCRA Facility Assessment (RFA) Report. Where discrepancies exist, the permit will take precedence.

List of SWMUs and AOCs requiring Corrective Measures.

| SWMU/AOC NUMBER* | SWMU/AOC NAME | Potentially Affected Media |
|-------------------------|--|-----------------------------------|
| SWMU 2 | Tramways in Concrete | Soil, groundwater |
| SWMU 3 | Creosote Oil/Water Separator | Soil, groundwater |
| SWMU 4 | Treated Pole Storage | Soil, groundwater |
| SWMU 5 | Liquid Loading and Unloading Area | Soil, groundwater |
| SWMU 6 | Buried Debris West of Closed Impoundment | Soil, groundwater |
| SWMU 7 | Disposal Area | Soil, groundwater |
| SWMU 8 & 9 | Oil/Water Separator Tanks | Soil, groundwater |
| SWMU 10 | Sump at North End of Wood Preserving Plant | Soil, groundwater |
| SWMU 21 | Drainage Pond and Swamp | Soil, groundwater, surface water |
| SWMU 22 | Area of Former Direct Discharge of Wastes | Soil, groundwater |
| SWMU 25 | Corrective Action System | Groundwater remediation |
| AOC A | Raw Creosote Tanks | Soil, groundwater |

* Corrective Measures have been constructed and implemented as described in the Corrective Measures Study/Corrective Measures Implementation Plan submitted on October 1, 1999, as modified by subsequent amendments dated June 15, 2005.

**PART VI SUMMARY OF
DEADLINES**

The summary information provided herein is intended only as a guide to the requirements of this permit. It is not intended to be all inclusive, nor is it intended to be used as a substitute for the full text of this permit.

| PERMIT CONDITION | ITEM | DUE DATE |
|-------------------------|--|---|
| I.C.2.b. | Reapply for a renewal | 180 calendar days before the expiration of the current permit. |
| I.C.12. | Give notice to the Department of any planned physical alterations or additions to the permitted facility and any solid waste management units. | As soon as possible |
| I.C.12. | Report any noncompliance with this permit that may endanger human health or the environment. | Orally within 24 hours from the time the Permittee becomes aware of the circumstances. Written submission shall also be provided within 5 calendar days of the time that the Permittee becomes aware of the circumstances |
| I.F. | Waste Minimization Certification | Annually |
| I.G. | Update cost estimates | No later than 30 calendar days after the Department has approved a modification to the Closure Plan, Post-Closure Plan, or Corrective Action Plan, or any other plan required or referenced by this permit, if the change in the plan results in an increase in the amount of the cost estimate and annually as required by ADEM Admin. Code r. 335-14-5-.08(3)(b), (5)(b), and (10)(b) |
| I.I. | Submit a written request for a permit modification pursuant to the requirements of ADEM Admin. Code r. 335-14-8-.04(2). | At least 60 calendar days prior to a proposed change in facility design or operation. |
| II.C.2 | Inspect closed unit(s). | At least quarterly, after storms, and in accordance with the inspection schedule. |
| III.B.1.a.iii. | Notification of damaged groundwater monitoring wells. | Immediately in writing. The well repair must be approved by the Department prior to implementation, and the repair report must be submitted within 30 calendar days of repair. |

| PERMIT CONDITION | ITEM | DUE DATE |
|------------------|--|--|
| III .B.1.d. | Install additional groundwater monitoring wells | As necessary to assess changes in the rate and extent of any plume of contamination, or as otherwise deemed necessary. Note: a permit modification request must be submitted within 90 calendar days prior to installation of additional groundwater monitoring well(s). |
| III .B.2.a. | Determine groundwater surface elevation. | At least semi-annually and each time a well is sampled. |
| III .B.2.b. | Determine groundwater flow rate and direction. | At least annually. |
| III .B.6.b. | Submit groundwater monitoring report | Within 60 calendar days of the first sampling event and annually thereafter. |
| III .B.6.c. | Submit progress reports. | Within 90 calendar days after the effective date of this permit and quarterly thereafter. See permit condition for start/stop/resume provisions. |
| III .E.2.b. | Implement corrective action plan | No later than 120 calendar days after the effective date of this permit. |
| III .E.3.a. | Sample all background, point of compliance, and effectiveness wells shown in Table III.1 and analyze for the constituents listed in Table III.2. of this permit. | Semi-annually beginning within 120 calendar days of the effective date of this permit. |
| III .E.3.b | Sample all background, point of compliance, effectiveness, and boundary wells shown in Table III.1 and analyze for the constituents listed in Table III.3. of this permit. | Annually beginning within 120 calendar days of the effective date of this permit. |
| III .E.3.c | Sample all background, point of compliance, effectiveness, and boundary wells shown in Table III.1 and analyze for temperature (degrees F or C), specific conductance (Mhos/cm), and pH (standard units). The data obtained should be submitted as raw data in the reports required by Permit Condition III.B.6. | Each time the well is sampled. |
| III .E.4.a. | Submit corrective action effectiveness reports. | Annually within 60 calendar days of each annual anniversary of this permit after corrective action is initiated and until corrective action is completed. |
| IV.B.1. | Notify the Department, in writing, of the discovery of any additional AOCs | Within 15 calendar days of discovery |

| PERMIT CONDITION | ITEM | DUE DATE |
|------------------|---|--|
| IV.B.2. | Notify the Department, in writing, of the discovery of any additional SWMUs | Within 15 calendar days of discovery |
| IV.B.3. | Submit a SWMU Assessment Report (SAR) for each SWMU identified under IV.B.2. | Within 90 calendar days of notification. |
| IV.C.1. | Notify the Department, in writing, of any newly discovered release(s) of hazardous waste or hazardous constituents from SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means. | Within 15 calendar days of discovery |
| IV.D.7. | Submit RFI Progress Reports. | Monthly beginning in the second month following the initiation of the RFI |
| IV.D.8. | Submit RFI Report | Within 60 calendar days from the completion of investigation activities. |
| IV.E.2. | Submit CMI Plan | Within 120 calendar days following the Permittee's submittal of the RFI Report indicating that hazardous constituents have come to be located at any area of the Permittee's facility, or beyond the facility, at concentrations exceeding those appropriate for the protection of human health and the environment, or within 120 calendar days following notification from the Department that a CMI Plan is required, whichever occurs earlier. |
| IV.E.4. | Demonstrate financial assurance for completing the approved remedy. | Within 120 calendar days after this Permit has been approved. |
| IV.F.1. | Submit IM Work Plan | Within 30 calendar days upon notification by the Department. |
| IV.F.3. | Submit IM Report | Within 90 calendar days of completion of IM. |
| V.B.5.a. | Submit to the local zoning authority, or the authority with jurisdiction over local land use, and to the Department, a survey plat indicating the location and dimensions of the SWMUs, AOCs, and capped or partially remediated areas with respect to permanently surveyed benchmarks, the locations of sampling points, and the concentrations of hazardous constituents detected | Within 90 calendar days following the effective date of a permit modification addressing remedy selection. |
| V.B.6.a. | Record environmental covenant | No later than the submission of the survey plat required in Condition V.B.5. |

| PERMIT CONDITION | ITEM | DUE DATE |
|-----------------------------|--|--|
| V.B.6.b. | Submit to the Department a certification that the environmental covenant has been performed. | No later than the submission of the plat required in Condition V.B.5. |
| V.D.3. | Submit Corrective Measures Effectiveness Reports | Annually beginning 180 calendar days following the Department's approval of the Final CMI Report |
| V.D.4. | Submit a Final Report of Corrective Measures (FRCM) | Within 90 calendar days following attainment of cleanup levels or goals |



Stella-Jones Corporation
Park West One, Suite 500
Pittsburgh, PA 15275
Telephone: 412-325-0202
Fax: 412-774-1689

September 21, 2023

Received

SEP 28 2023

Land Division

CERTIFIED MAIL, RETURN RECEIPT REQUESTED-7022 1670 0001 8667 8254

Ms. Sonja B. Favors, Chief
Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
P. O. Box 301463
Montgomery, AL 36130-1463

Re: Hazardous Waste Facility Permit Number ALD 031 490 501
Major Modification for a Permit Transfer

Dear Ms. Favors:

On July 14, 2023, Stella-Jones Corporation purchased the assets of Baldwin Pole & Piling Co., Inc. (Baldwin), and a notification of regulated waste activity form was submitted to ADEM for notification of the facility name change. The Baldwin facility maintained a Hazardous Waste Facility Permit for post-closure care of a former surface impoundment that was closed as a hazardous waste landfill in 1987. Please find enclosed a Revised Part A application and supporting documents for the purpose of transferring the above permit to Stella-Jones Corporation. As directed by Austin Pierce, we have submitted this application as a Major Modification for a "Non-Unit Specific Modification" and we are mailing the associated \$5,400 permit fee under separate cover.

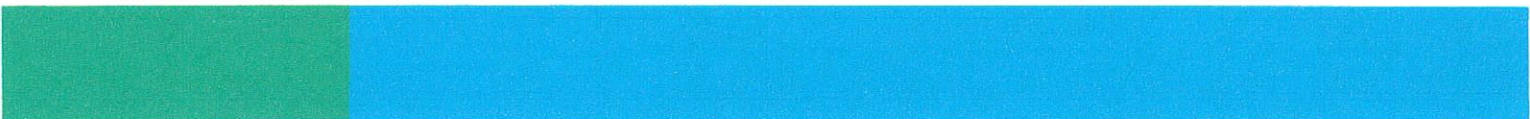
Please contact me if you require any additional information.


Sincerely,

A handwritten signature in black ink, appearing to read 'Heather Gawne', is written over a light blue background.

Heather Gawne
Director of Environmental Compliance

Enclosures



| | |
|---|---|
| United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM |  |
|---|---|

1. Reason for Submittal (Select only one.)

| | |
|-------------------------------------|--|
| <input type="checkbox"/> | Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time. |
| <input type="checkbox"/> | Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year) |
| <input type="checkbox"/> | Site was a TSD facility, a reverse distributor, and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations) |
| <input type="checkbox"/> | Notifying that regulated activity is no longer occurring at this Site |
| <input type="checkbox"/> | Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities |
| <input checked="" type="checkbox"/> | Submitting a new or revised Part A (permit) Form |

2. Site EPA ID Number

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| A | L | D | 0 | 3 | 1 | 4 | 9 | 0 | 5 | 0 | 1 |
|---|---|---|---|---|---|---|---|---|---|---|---|

3. Site Name

| |
|---|
| Stella-Jones Corporation - Bay Minette HWY 31 |
|---|

4. Site Location Address

| | | | |
|------------------------|-----------------------|--|-----------|
| Street Address | 1101 Highway 31 North | | |
| City, Town, or Village | Bay Minette | County | Baldwin |
| State | AL | Country | USA |
| | | Zip Code | 36507 |
| Latitude | 30°53'30" | Longitude | 87°45'15" |
| | | <input type="checkbox"/> Use Lat/Long as Primary Address | |

5. Site Mailing Address

Same as Location Street Address

| | | |
|------------------------|---------|----------|
| Street Address | | |
| City, Town, or Village | | |
| State | Country | Zip Code |

6. Site Land Type

| | | | | | | | |
|---|---------------------------------|-----------------------------------|----------------------------------|---------------------------------|------------------------------------|--------------------------------|--------------------------------|
| <input checked="" type="checkbox"/> Private | <input type="checkbox"/> County | <input type="checkbox"/> District | <input type="checkbox"/> Federal | <input type="checkbox"/> Tribal | <input type="checkbox"/> Municipal | <input type="checkbox"/> State | <input type="checkbox"/> Other |
|---|---------------------------------|-----------------------------------|----------------------------------|---------------------------------|------------------------------------|--------------------------------|--------------------------------|

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

| | |
|--------------------------|----|
| A. (Primary) 321114 | C. |
| B. | D. |

8. Site Contact Information

 Same as Location Address

| | | | | |
|------------------------|--------------|-----|-----------|------|
| First Name | Ray | MI | Last Name | Long |
| Title | | | | |
| Plant Manager | | | | |
| Street Address | | | | |
| City, Town, or Village | | | | |
| State | Country | | Zip Code | |
| Email | | | | |
| rlong@stella-jones.com | | | | |
| Phone | 251-370-8144 | Ext | Fax | |

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

 Same as Location Address

| | | |
|---|---------------------------------|------------------------------------|
| Full Name | Date Became Owner (mm/dd/yyyy) | |
| Stella-Jones Corporation | 7/14/2023 | |
| Owner Type | | |
| <input checked="" type="checkbox"/> Private | <input type="checkbox"/> County | <input type="checkbox"/> District |
| <input type="checkbox"/> Federal | <input type="checkbox"/> Tribal | <input type="checkbox"/> Municipal |
| <input type="checkbox"/> State | <input type="checkbox"/> Other | |
| Street Address | | |
| City, Town, or Village | | |
| State | Country | Zip Code |
| Email | | |
| Phone | Ext | Fax |
| Comments | | |

B. Name of Site's Legal Operator

 Same as Location Address

| | | |
|---|-----------------------------------|------------------------------------|
| Full Name | Date Became Operator (mm/dd/yyyy) | |
| Stella-Jones Corporation | 7/14/2023 | |
| Operator Type | | |
| <input checked="" type="checkbox"/> Private | <input type="checkbox"/> County | <input type="checkbox"/> District |
| <input type="checkbox"/> Federal | <input type="checkbox"/> Tribal | <input type="checkbox"/> Municipal |
| <input type="checkbox"/> State | <input type="checkbox"/> Other | |
| Street Address | | |
| City, Town, or Village | | |
| State | Country | Zip Code |
| Email | | |
| Phone | Ext | Fax |
| Comments | | |

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities

| | | |
|--|---|--|
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | 1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c | |
| <input checked="" type="checkbox"/> | a. LQG | -Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material. |
| <input type="checkbox"/> | b. SQG | 100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material. |
| <input type="checkbox"/> | c. VSQG | Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i> | |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities. | |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 4. Receives Hazardous Waste from Off-site | |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 5. Recycler of Hazardous Waste | |
| <input type="checkbox"/> | a. Recycler who stores prior to recycling | |
| <input type="checkbox"/> | b. Recycler who does not store prior to recycling | |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply. | |
| <input type="checkbox"/> | a. Small Quantity On-site Burner Exemption | |
| <input type="checkbox"/> | b. Smelting, Melting, and Refining Furnace Exemption | |

B. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

| | | | | | | |
|------|--|--|--|--|--|--|
| F032 | | | | | | |
| K001 | | | | | | |
| | | | | | | |
| | | | | | | |

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

| | | | | | | |
|--|--|--|--|--|--|--|
| | | | | | | |
| | | | | | | |

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)

A. Other Waste Activities

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 1. Transporter of Hazardous Waste—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Transporter |
| <input type="checkbox"/> | b. Transfer Facility (at your site) |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Underground Injection Control |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 3. United States Importer of Hazardous Waste |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 4. Recognized Trader—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Importer |
| <input type="checkbox"/> | b. Exporter |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Importer |
| <input type="checkbox"/> | b. Exporter |

B. Universal Waste Activities

| | |
|--|--|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated. |
| <input type="checkbox"/> | a. Batteries |
| <input type="checkbox"/> | b. Pesticides |
| <input type="checkbox"/> | c. Mercury containing equipment |
| <input type="checkbox"/> | d. Lamps |
| <input type="checkbox"/> | e. Aerosol Cans |
| <input type="checkbox"/> | f. Other (specify) _____ |
| <input type="checkbox"/> | g. Other (specify) _____ |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity. |

C. Used Oil Activities

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 1. Used Oil Transporter—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Transporter |
| <input type="checkbox"/> | b. Transfer Facility (at your site) |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Processor |
| <input type="checkbox"/> | b. Re-refiner |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 3. Off-Specification Used Oil Burner |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 4. Used Oil Fuel Marketer—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner |
| <input type="checkbox"/> | b. Marketer Who First Claims the Used Oil Meets the Specifications |

D. Pharmaceutical Activities

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor. |
| <input type="checkbox"/> | a. Healthcare Facility |
| <input type="checkbox"/> | b. Reverse Distributor |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals. |

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262, Subpart K.

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories— If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities. |
| <input type="checkbox"/> | 1. College or University |
| <input type="checkbox"/> | 2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university |
| <input type="checkbox"/> | 3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories. |

13. Episodic Generation

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator. |
|--|---|

14. LQG Consolidation of VSQG Hazardous Waste

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste. |
|--|---|

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

| | |
|---|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility. |
| A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility | |
| B. Expected closure date: _____ mm/dd/yyyy | |
| C. Requesting new closure date: _____ mm/dd/yyyy | |
| D. Date closed : _____ mm/dd/yyyy | |
| <input type="checkbox"/> | 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) |
| <input type="checkbox"/> | 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8) |

16. Notification of Hazardous Secondary Material (HSM) Activity

| | | |
|----------------------------|---------------------------------------|---|
| <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N | Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material. |
|----------------------------|---------------------------------------|---|

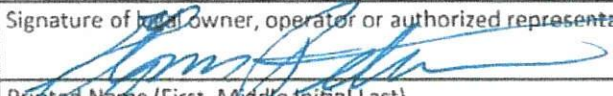
17. Electronic Manifest Broker

| | | |
|----------------------------|---------------------------------------|--|
| <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N | Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator? |
|----------------------------|---------------------------------------|--|

18. Comments (include item number for each comment)

This Revised Part A application is intended to support the permit transfer of Hazardous Waste Facility Permit Number ALD 031 490 501 due to a facility ownership change. The facility's prior owner, Baldwin Pole & Piling Company, Inc., was purchased by Stella-Jones Corporation on 7/14/2023.

19. 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 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 fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

| | |
|---|----------------------------------|
| Signature of legal owner, operator or authorized representative | Date (mm/dd/yyyy) |
|  | 9/29/23 |
| Printed Name (First, Middle Initial Last) | Title |
| Glynn Pittman | Vice President of SYP Operations |
| Email | |
| gpittman@stella-jones.com | |

| | |
|---|-------------------|
| Signature of legal owner, operator or authorized representative | Date (mm/dd/yyyy) |
| | |
| Printed Name (First, Middle Initial Last) | Title |
| | |
| Email | |
| | |

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT PART A FORM



1. Facility Permit Contact

| | | | | |
|------------|------------------------|-----|-----------|------|
| First Name | Ray | MI | Last Name | Long |
| Title | Plant Manager | | | |
| Email | rlong@stella-jones.com | | | |
| Phone | 251-370-8144 | Ext | Fax | |

2. Facility Permit Contact Mailing Address

| | | | |
|------------------------|-----------------------|---------|-----|
| Street Address | 1101 Highway 31 North | | |
| City, Town, or Village | Bay Minette | | |
| State | AL | Country | USA |
| Zip Code | 36507 | | |

3. Facility Existence Date (mm/dd/yyyy)

6/1/1958

4. Other Environmental Permits

| A. Permit Type | B. Permit Number | | | | | | | | | | C. Description | | |
|----------------|------------------|---|---|---|---|---|---|---|---|--------------------------|----------------|---------------------------------|--------------------------------|
| R | A | L | D | 0 | 3 | 1 | 4 | 9 | 0 | 5 | 0 | 1 | Alabama Hazardous Waste Permit |
| N | I | U | 3 | 3 | 0 | 2 | 0 | 0 | 0 | 2 | 7 | State Indirect Discharge Permit | |
| N | A | L | 0 | 0 | 5 | 9 | 9 | 4 | 3 | NPDES Storm Water Permit | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |

5. Nature of Business

Manufacturer of treated utility poles.

No hazardous waste treatment, storage, or disposal requiring a permit is performed at this site.

From historical operations, the facility utilized a surface impoundment which has now been closed as a hazardous waste landfill, and this unit requires post closure care.

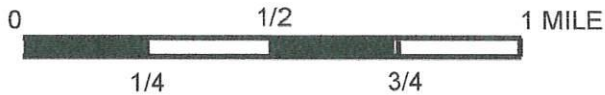
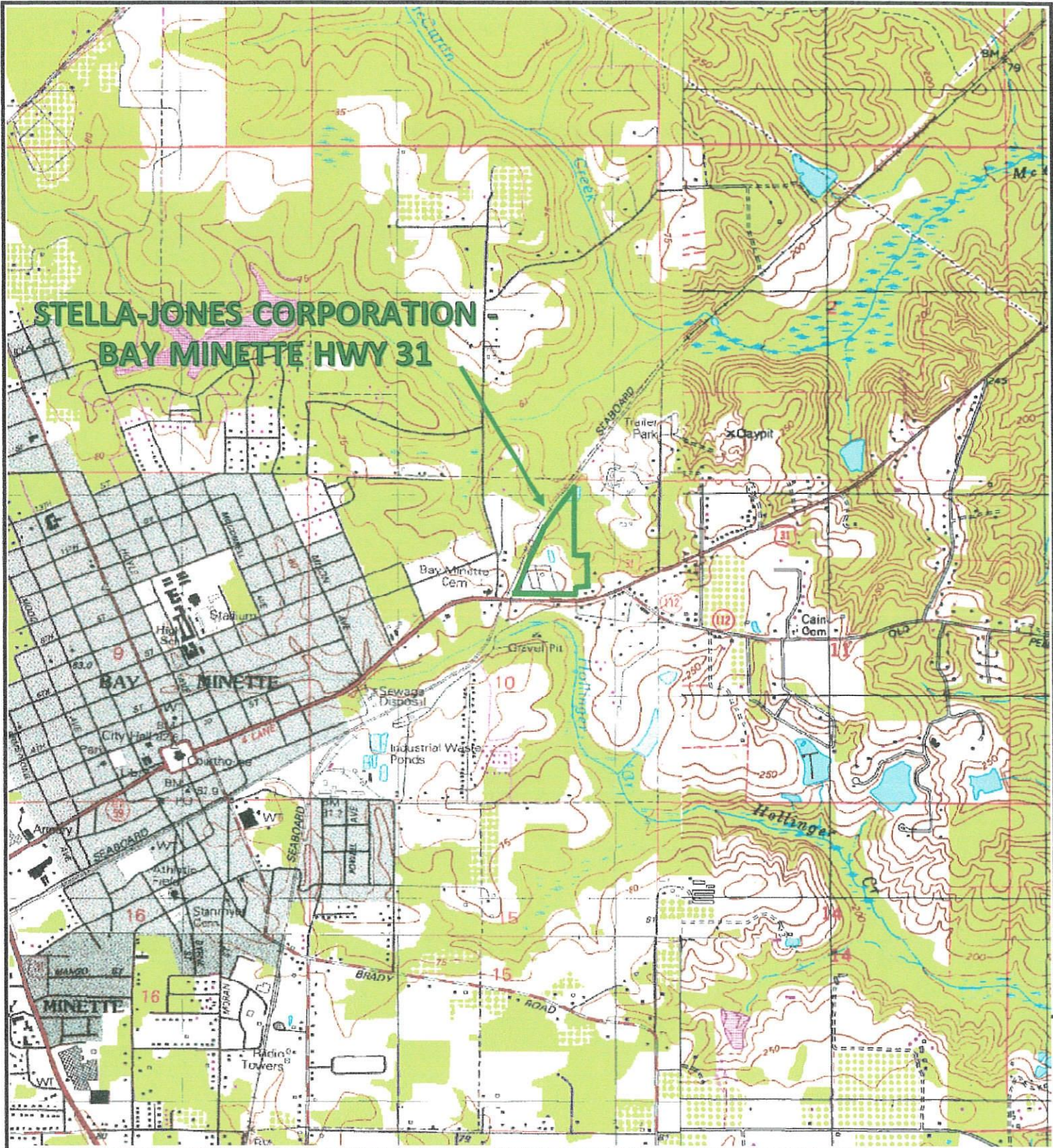


FORMER SURFACE IMPOUNDMENT
CLOSED AS LANDFILL

Google

200 ft Imagery ©2023 Airbus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2023

| | | | |
|--|----------------------------------|---------------------|--|
| STELLA-JONES CORPORATION - BAY MINETTE HWY 31 | AERIAL PHOTOGRAPH GOOGLE MAPS | SCALE: 1" ≈ 213' | H.M. ROLLINS CO., INC. GULFPORT, MS |
|--|----------------------------------|---------------------|--|



| | | | |
|--|---|----------------------|--|
| STELLA-JONES CORPORATION - BAY MINETTE HWY 31 | U.S.G.S. TOPOGRAPHIC MAP QUAD: BAY MINETTE NORTH | SCALE: 1" = 1980' | H.M. ROLLINS CO., INC. GULFPORT, MS |
|--|---|----------------------|--|

