

Alabama Department of Environmental Management

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APRIL 8,2025 APRIL 8,2055 APRIL 8,2025 APRIL 8,2055 APRIL 8,2055 APRIL 8,2055 APRIL 8,2055 APRIL

MR. CORY OLSON PLANT MANAGER KOPPERS UTILITY & INDUSTRIAL PRODUCTS I6851 HIGHWAY 96 KENNEDY, AL 35574

RE: DRAFT PERMIT NPDES PERMIT NUMBER AL0066184

Dear Mr. Olson:

Transmitted herein is a draft of the referenced permit.

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

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

Our records indicate that you have utilized the Department's web-based electronic environmental (E2) reporting system for submittal of discharge monitoring reports (DMRs). The Department transitioned from the E2 Reporting System to the Alabama Environmental Permitting and Compliance System (AEPACS) for the submittal of DMRs on November 15, 2021. AEPACS is an electronic system that allows facilities to apply for and maintain permits as well as submit other required applications, registrations, and certifications. In addition, the system allows facilities to submit required compliance reports or other information to the Department. The Department has used the E2 User account information to set up a similar User Profile in AEPACS based on the following criteria:

- 1. The user has logged in to E2 since October 1, 2019; and
- 2. The E2 user account is set up using a unique email address.

E2 users that met the above criteria will only need to establish an ADEM Web Portal account (<u>https://prd.adem.alabama.gov/awp</u>) under the same email address as their E2 account to have the same permissions in AEPACS as they did in E2. They will also automatically be linked to the same facilities they were in E2.

The Alabama Department of Environmental Management encourages you to voluntarily consider pollution prevention practices and alternatives at your facility. Pollution Prevention may assist you in complying with effluent limitations, and possibly reduce or eliminate monitoring requirements.

If you have questions regarding this permit or monitoring requirements, please contact Theo Pinson by e-mail at **tpinson@adem.alabama.gov** or by phone at (334) 274-4202.

Sincerely Scott Jack on, Industrial Section

Industrial Section Industrial/Municipal Branch Water Division

Enclosure:

Draft Permit

pc via website:

Montgomery Field Office EPA Region IV U.S. Fish & Wildlife Service AL Historical Commission Advisory Council on Historic Preservation Department of Conservation and Natural Resources



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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE:	KOPPERS UTILITY & INDUSTRIAL PRODUCTS
FACILITY LOCATION:	KOPPERS UTILITY AND INDUSTRIAL PRODUCTS INC. KENNEDY PLANT 16851 HIGHWAY 96 KENNEDY, ALABAMA 35574 LAMAR COUNTY
PERMIT NUMBER:	AL0066184
RECEIVING WATERS:	DSN001 – DSN003, DSN005 – DSN008: UNNAMED TRIBUTARIES TO

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

LUXAPALLILA CREEK

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:



Alabama Department of Environmental Management

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PART I: DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

DSN001Q, DSN002Q: Storm water runoff associated with lumber and wood products including wood treating operations using inorganic preservatives containing chromium, copper and arsenic. 3/4/6/

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

Parameter	Parameter Quantity or Loading Units Quality or Concentration						Units	Sample Frequency ²	Sample Type ¹	Seasonal
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	****	****	****	****	***	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months
Arsenic, Total Recoverable (00978) 5/ Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium Total Recoverable (01118) 5 / Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Copper Total Recoverable (01119) 5 / Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months

- 1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.
- 2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.
- 3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.
- 4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.
- 5/ For the purpose of determining compliance with permit requirements for this parameter "Total" and "Total Recoverable" shall be considered equivalent.
- 6/ Outfall DSN001 is deemed representative of Outfall DSN002. Monitoring is only required at DSN001.

DSN003Q, DSN005Q: Storm water runoff associated with lumber and wood products including wood treating operations using inorganic preservatives containing chromium, copper and arsenic, formulations using DCOI and the former use of chlorophenolics. 3/4/

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

Parameter	Quantity	or Loading	Units	Qu	ality or Concentra	tion	Units	Sample Frequency ²	Sample Type ¹	Seasonal
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15 Maximum Daily	mg/l	Quarterly	Grab	All Months
Arsenic, Total Recoverable (00978) 5/ Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium Total Recoverable (01118) 5/ Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Copper Total Recoverable (01119) 5 / Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Purgeable Aromatics Method 602 (03771) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Benzene (34030) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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

DSN003Q, DSN005Q (Continued): Storm water runoff associated with lumber and wood products including wood treating operations using inorganic preservatives containing chromium, copper and arsenic, formulations using DCOI and the former use of chlorophenolics. 3/4/

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

Parameter	'arameter Quantity or Loading Units				uality or Concentr	Units	Sample Frequency ²	Sample Type ¹	Seasonal	
2,4,6-Trichlorophenol (34621) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
4-Nitrophenol (34646) Effluent Gross Value	****	* * * *	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Phenol, Single Compound (34694) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Pentachlorophenol (39032) Effluent Gross Value	* * * *	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months

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

DSN006Q: Storm water runoff associated with storage of raw lumber and wood. 3/4/

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

Parameter	Parameter Quantity or Loading				Quality or Concentration				Sample Type ¹	Seasonal
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	* * * *	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months

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

DSN007Q, DSN008Q: Storm water runoff associated with lumber and wood products treated with preservatives. 3/4/

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

Parameter	Quantity o	or Loading	Units	Qu	ality or Concentra	tion	Units	Sample Frequency ²	Sample Type ¹	Seasonal
BOD, 5-D ay (20 Deg. C) (00310) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	***	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months
Arsenic, Total Recoverable (00978) 5/ Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium Total Recoverable (01118) 5/ Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Copper Total Recoverable (01119) 5/ Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Purgeable Aromatics Method 602 (03771) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Pentachlorophenol (39032) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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

DSN007Q, DSN008Q (Continued): Storm water runoff associated with lumber and wood products treated with preservatives 3/4/

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

Parameter	Parameter Quantity or Loading			Units Quality or Concentration			Units	Sample Frequency ²	Sample Type ¹	Seasonal
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months

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

1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.

2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.

3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.

4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.



B. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge and shall be in accordance with the provisions of this permit.

2. Test Procedures

For the purpose of reporting and compliance, permittees shall use one of the following procedures:

- a. For parameters with an EPA established Minimum Level (ML), report the measured value if the analytical result is at or above the ML and report "0" for values below the ML. Test procedures for the analysis of pollutants shall conform to 40 CFR Part 136 and guidelines published pursuant to Section 304(h) of the FWPCA, 33 U.S.C. Section 1314(h). If more than one method for analysis of a substance is approved for use, a method having a minimum level lower than the permit limit shall be used. If the minimum level of all methods is higher than the permit limit, the method having the lowest minimum level shall be used and a report of less than the minimum level shall be reported as zero and will constitute compliance; however, should EPA approve a method with a lower minimum level during the term of this permit the permit the newly approved method.
- b. For pollutants parameters without an established ML, an interim ML may be utilized. The interim ML shall be calculated as 3.18 times the Method Detection Level (MDL) calculated pursuant to 40 CFR Part 136, Appendix B.

Permittees may develop an effluent matrix-specific ML, where an effluent matrix prevents attainment of the established ML. However, a matrix specific ML shall be based upon proper laboratory method and technique. Matrix-specific MLs must be approved by the Department, and may be developed by the permittee during permit issuance, reissuance, modification, or during compliance schedule.

In either case the measured value should be reported if the analytical result is at or above the ML and "0" reported for values below the ML.

c. For parameters without an EPA established ML, interim ML, or matrix-specific ML, a report of less than the detection limit shall constitute compliance if the detection limit of all analytical methods is higher than the permit limit using the most sensitive EPA approved method. For the purpose of calculating a monthly average, "0" shall be used for values reported less than the detection limit.

The Minimum Level utilized for procedures A and B above shall be reported on the permittee's DMR. When an EPA approved test procedure for analysis of a pollutant does not exist, the Director shall approve the procedure to be used.

3. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The facility name and location, point source number, date, time and exact place of sampling;
- b. The name(s) of person(s) who obtained the samples or measurements;
- c. The dates and times the analyses were performed;
- d. The name(s) of the person(s) who performed the analyses;
- e. The analytical techniques or methods used, including source of method and method number; and
- f. The results of all required analyses.

4. Records Retention and Production

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the above reports or the application for this permit, for a period of at least three years from the date of the sample measurement, report or application. This period may be extended by request of the Director at any time. If litigation or other enforcement action, under the AWPCA and/or the FWPCA, is ongoing which involves any of the above records, the records shall be kept until the litigation is resolved. Upon the written request of the Director or his designee, the

permittee shall provide the Director with a copy of any record required to be retained by this paragraph. Copies of these records shall not be submitted unless requested.

All records required to be kept for a period of three years shall be kept at the permitted facility or an alternate location approved by the Department in writing and shall be available for inspection.

5. Monitoring Equipment and Instrumentation

All equipment and instrumentation used to determine compliance with the requirements of this permit shall be installed, maintained, and calibrated in accordance with the manufacturer's instructions or, in the absence of manufacturer's instructions, in accordance with accepted practices. The permittee shall develop and maintain quality assurance procedures to ensure proper operation and maintenance of all equipment and instrumentation. The quality assurance procedures shall include the proper use, maintenance, and installation, when appropriate, of monitoring equipment at the plant site.

C. DISCHARGE REPORTING REQUIREMENTS

1. Reporting of Monitoring Requirements

a. The permittee shall conduct the required monitoring in accordance with the following schedule:

MONITORING REQUIRED MORE FREQUENTLY THAN MONTHLY AND MONTHLY shall be conducted during the first full month following the effective date of coverage under this permit and every month thereafter.

QUARTERLY MONITORING shall be conducted at least once during each calendar quarter. Calendar quarters are the periods of January through March, April through June, July through September, and October through December. The permittee shall conduct the quarterly monitoring during the first complete calendar quarter following the effective date of this permit and is then required to monitor once during each quarter thereafter. Quarterly monitoring may be done anytime during the quarter, unless restricted elsewhere in this permit, but it should be submitted with the last DMR due for the quarter, i.e., (March, June, September and December DMR's).

SEMIANNUAL MONITORING shall be conducted at least once during the period of January through June and at least once during the period of July through December. The permittee shall conduct the semiannual monitoring during the first complete calendar semiannual period following the effective date of this permit and is then required to monitor once during each semiannual period thereafter. Semiannual monitoring may be done anytime during the semiannual period, unless restricted elsewhere in this permit, but it should be submitted with the last DMR for the month of the semiannual period, i.e. (June and December DMR's).

ANNUAL MONITORING shall be conducted at least once during the period of January through December. The permittee shall conduct the annual monitoring during the first complete calendar annual period following the effective date of this permit and is then required to monitor once during each annual period thereafter. Annual monitoring may be done anytime during the year, unless restricted elsewhere in this permit, but it should be submitted with the December DMR.

b. The permittee shall submit discharge monitoring reports (DMRs) on the forms provided by the Department and in accordance with the following schedule:

REPORTS OF MORE FREQUENTLY THAN MONTHLY AND MONTHLY TESTING shall be submitted on a **monthly** basis. The first report is due on the **28th day of (MONTH, YEAR).** The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period.

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

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

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

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

(1) If the permittee is unable to complete the electronic submittal of DMR data due to technical problems originating with the Department's electronic system (this could include entry/submittal issues with an entire set of DMRs or individual parameters), the permittee is not relieved of their obligation to submit DMR data to the Department by the date specified in Provision I.C.1.b, unless otherwise directed by the Department.

If the Department's electronic system is down on the 28th day of the month in which the DMR is due or is down for an extended period of time, as determined by the Department, when a DMR is required to be submitted, the permittee may submit the data in an alternate manner and format acceptable to the Department. Preapproved alternate acceptable methods include faxing, e-mailing, mailing, or hand-delivery of data such that they are received by the required reporting date. Within 5 calendar days of the Department's electronic system resuming operation, the permittee shall enter the data into the Department's electronic system, unless an alternate timeframe is approved by the Department. A comment should be included on the electronic DMR submittal verifying the original submittal date (date of the fax, copy of the dated e-mail, or hand-delivery stamped date), if applicable.

(2) The permittee may submit a request to the Department for a temporary electronic reporting waiver for DMR submittals. The waiver request should include the permit number; permittee name; facility/site name; facility address; name, address, and contact information for the responsible official or duly authorized representative; a detailed statement regarding the basis for requesting such a waiver; and the duration for which the waiver is requested. Approved electronic reporting waivers are not transferrable.

Permittees with an approved electronic reporting waiver for DMRs may submit hard copy DMRs for the period that the approved electronic reporting waiver request is effective. The permittee shall submit the Department-approved DMR forms to the address listed in Provision I.C.1.e.

- (3) If a permittee is allowed to submit a hard copy DMR, the DMR must be legible and bear an original signature. Photo and electronic copies of the signature are not acceptable and shall not satisfy the reporting requirements of this permit.
- (4) If the permittee, using approved analytical methods as specified in Provision I.B.2, monitors any discharge from a point source for a limited substance identified in Provision I.A. of this permit more frequently than required by this permit, the results of such monitoring shall be included in the calculation and reporting of values on the DMR and the increased frequency shall be indicated on the DMR.
- (5) In the event no discharge from a point source identified in Provision I.A. of this permit and described more fully in the permittee's application occurs during a monitoring period, the permittee shall report "No Discharge" for such period on the appropriate DMR.
- d. All reports and forms required to be submitted by this permit, the AWPCA and the Department's Rules, shall be electronically signed (or, if allowed by the Department, traditionally signed) by a "responsible official" of the permittee as defined in ADEM Administrative Code Rule 335-6-6-.09 or a "duly authorized representative" of such official as defined in ADEM Administrative Code Rule 335-6-6-.09 and shall bear the following certification:

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

e. Discharge Monitoring Reports required by this permit, the AWPCA, and the Department's Rules that are being submitted in hard copy shall be addressed to:

Alabama Department of Environmental Management Water Division Office of Water Services Post Office Box 301463 Montgomery, Alabama 36130-1463 Certified and Registered Mail containing Discharge Monitoring Reports shall be addressed to:

Alabama Department of Environmental Management Water Division Office of Water Services 1400 Coliseum Boulevard Montgomery, Alabama 36110-2400

f. All other correspondence and reports required to be submitted by this permit, the AWPCA, and the Department's Rules shall be addressed to:

Alabama Department of Environmental Management' Water Division Post Office Box 301463 Montgomery, Alabama 36130-1463

Certified and Registered Mail shall be addressed to:

Alabama Department of Environmental Management Water Division 1400 Coliseum Boulevard Montgomery, Alabama 36110-2400

g. If this permit is a re-issuance, then the permittee shall continue to submit DMRs in accordance with the requirements of their previous permit until such time as DMRs are due as discussed in Part I.C.1.b above.

2. Noncompliance Notification

a. 24-Hour Noncompliance Reporting

The permittee shall report to the Director, within 24-hours of becoming aware of the noncompliance, any noncompliance which may endanger health or the environment. This shall include but is not limited to the following circumstances:

- (1) does not comply with any daily minimum or maximum discharge limitation for an effluent characteristic specified in Provision I. A. of this permit which is denoted by an "(X)";
- (2) threatens human health or welfare, fish or aquatic life, or water quality standards;
- (3) does not comply with an applicable toxic pollutant effluent standard or prohibition established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a);
- (4) contains a quantity of a hazardous substance which has been determined may be harmful to public health or welfare under Section 311(b)(4) of the FWPCA, 33 U.S.C. Section 1321(b)(4);
- (5) exceeds any discharge limitation for an effluent characteristic as a result of an unanticipated bypass or upset; and
- (6) is an unpermitted direct or indirect discharge of a pollutant to a water of the state (unpermitted discharges properly reported to the Department under any other requirement are not required to be reported under this provision).

The permittee shall orally report the occurrence and circumstances of such discharge to the Director within 24-hours after the permittee becomes aware of the occurrence of such discharge. In addition to the oral report, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c no later than five (5) days after becoming aware of the occurrence of such discharge.

- b. If for any reason, the permittee's discharge does not comply with any limitation of this permit, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c below, such report shall be submitted with the next Discharge Monitoring Report required to be submitted by Part I.C.1 of this permit after becoming aware of the occurrence of such noncompliance.
- c. Any written report required to be submitted to the Director or Designee by Part I.C.2 a. or b. shall be submitted using a Noncompliance Notification Form (ADEM Form 421) available on the Department's website (<u>http://adem.alabama.gov/DeptForms/Form421.pdf</u>) and include the following information:
 - (1) A description of the discharge and cause of noncompliance;

- (2) The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and
- (3) A description of the steps taken and/or being taken to reduce or eliminate the noncomplying discharge and to prevent its recurrence.

D. OTHER REPORTING AND NOTIFICATION REQUIREMENTS

1. Anticipated Noncompliance

The permittee shall give the Director written advance notice of any planned changes or other circumstances regarding a facility which may result in noncompliance with permit requirements.

2. Termination of Discharge

The permittee shall notify the Director, in writing, when all discharges from any point source(s) identified in Provision I. A. of this permit have permanently ceased. This notification shall serve as sufficient cause for instituting procedures for modification or termination of the permit.

3. Updating Information

- a. The permittee shall inform the Director of any change in the permittee's mailing address, telephone number or in the permittee's designation of a facility contact or office having the authority and responsibility to prevent and abate violations of the AWPCA, the Department's Rules, and the terms and conditions of this permit, in writing, no later than ten (10) days after such change. Upon request of the Director or his designee, the permittee shall furnish the Director with an update of any information provided in the permit application.
- b. If the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information with a written explanation for the mistake and/or omission.

4. Duty to Provide Information

The permittee shall furnish to the Director, within a reasonable time, any information which the Director or his designee may request to determine whether cause exists for modifying, revoking and re-issuing, suspending, or terminating this permit, in whole or in part, or to determine compliance with this permit.

5. Cooling Water and Boiler Water Additives

- a. The permittee shall notify the Director in writing not later than thirty (30) days prior to instituting the use of any biocide corrosion inhibitor or chemical additive in a cooling or boiler system, not identified in the application for this permit, from which discharge is allowed by this permit. Notification is not required for additives that do not contain a heavy metal(s) as an active ingredient and that pass through a wastewater treatment system prior to discharge nor is notification required for additives that should not reasonably be expected to cause the cooling water or boiler water to exhibit toxicity as determined by analysis of manufacturer's data or testing by the permittee. Such notification shall include:
 - (1) name and general composition of biocide or chemical;
 - (2) 96-hour median tolerance limit data for organisms representative of the biota of the waterway into which the discharge will ultimately reach;
 - (3) quantities to be used;
 - (4) frequencies of use;
 - (5) proposed discharge concentrations; and
 - (6) EPA registration number, if applicable.
- b. The use of a biocide or additive containing tributyl tin, tributyl tin oxide, zinc, chromium or related compounds in cooling or boiler system(s), from which a discharge regulated by this permit occurs, is prohibited except as exempted below. The use of a biocide or additive containing zinc, chromium or related compounds may be used in special circumstances if (1) the permit contains limits for these substances, or (2) the applicant demonstrates during the application process that the use of zinc, chromium or related compounds as a biocide or additive will not pose a reasonable potential to violate the applicable State water quality standards for these substances. The use of any additive, not identified in this permit or in the

application for this permit or not exempted from notification under this permit is prohibited, prior to a determination by the Department that permit modification to control discharge of the additive is not required or prior to issuance of a permit modification controlling discharge of the additive.

6. Permit Issued Based on Estimated Characteristics

- a. If this permit was issued based on estimates of the characteristics of a process discharge reported on an EPA NPDES Application Form 2D (EPA Form 3510-2D), the permittee shall complete and submit an EPA NPDES Application Form 2C (EPA Form 3510-2C) no later than two years after the date that discharge begins. Sampling required for completion of the Form 2C shall occur when a discharge(s) from the process(s) causing the new or increased discharge is occurring. If this permit was issued based on estimates concerning the composition of a stormwater discharge(s), the permittee shall perform the sampling required by EPA NPDES Application Form 2F (EPA Form 3510-2F) no later than one year after the industrial activity generating the stormwater discharge has been fully initiated.
- b. This permit shall be reopened if required to address any new information resulting from the completion and submittal of the Form 2C and or 2F.

E. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the discharge limitations specified in Provision I. A. in accordance with the following schedule:

COMPLIANCE SHALL BE ATTAINED ON THE EFFECTIVE DATE OF THIS PERMIT

- 2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.
- 3. No later than 180 days from the effective date of this permit, the permittee shall submit an updated Best Management Practices (BMP) plan to include actions being taken to prevent or minimize the potential for the release of pollutants associated with the discharge of stormwater runoff through outfalls DSN006, DSN007 and DSN008.

PART II: OTHER REQUIREMENTS, RESPONSIBILITIES, AND DUTIES

A. OPERATIONAL AND MANAGEMENT REQUIREMENTS

1. Facilities Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities only when necessary to achieve compliance with the conditions of the permit.

2. Best Management Practices

- a. Dilution water shall not be added to achieve compliance with discharge limitations except when the Director or his designee has granted prior written authorization for dilution to meet water quality requirements.
- b. The permittee shall prepare, implement, and maintain a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 C.F.R. Section 112 if required thereby.
- c. The permittee shall prepare, submit for approval and implement a Best Management Practices (BMP) Plan for containment of any or all process liquids or solids, in a manner such that these materials do not present a significant potential for discharge, if so required by the Director or his designee. When submitted and approved, the BMP Plan shall become a part of this permit and all requirements of the BMP Plan shall become requirements of this permit.

3. Spill Prevention, Control, and Management

The permittee shall provide spill prevention, control, and/or management sufficient to prevent any spills of pollutants from entering a water of the state or a publicly or privately owned treatment works. Any containment system used to implement this requirement shall be constructed of materials compatible with the substance(s) contained and which shall prevent the contamination of groundwater and such containment system shall be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided.

B. OTHER RESPONSIBILITIES

1. Duty to Mitigate Adverse Impacts

The permittee shall promptly take all reasonable steps to mitigate and minimize or prevent any adverse impact on human health or the environment resulting from noncompliance with any discharge limitation specified in Provision I. A. of this permit, including such accelerated or additional monitoring of the discharge and/or the receiving waterbody as necessary to determine the nature and impact of the noncomplying discharge.

2. Right of Entry and Inspection

The permittee shall allow the Director, or an authorized representative, upon the presentation of proper credentials and other documents as may be required by law to:

- a. enter upon the permittee's premises where a regulated facility or activity or point source is located or conducted, or where records must be kept under the conditions of the permit;
- b. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and
- d. sample or monitor, for the purposes of assuring permit compliance or as otherwise authorized by the AWPCA, any substances or parameters at any location.

C. BYPASS AND UPSET

1. Bypass

- a. Any bypass is prohibited except as provided in b. and c. below:
- b. A bypass is not prohibited if:

- (1) It does not cause any discharge limitation specified in Provision I. A. of this permit to be exceeded;
- (2) It enters the same receiving stream as the permitted outfall; and
- (3) It is necessary for essential maintenance of a treatment or control facility or system to assure efficient operation of such facility or system.
- c. A bypass is not prohibited and need not meet the discharge limitations specified in Provision I. A. of this permit if:
 - (1) It is unavoidable to prevent loss of life, personal injury, or severe property damage;
 - (2) There are no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and
 - (3) The permittee submits a written request for authorization to bypass to the Director at least ten (10) days prior to the anticipated bypass (if possible), the permittee is granted such authorization, and the permittee complies with any conditions imposed by the Director to minimize any adverse impact on human health or the environment resulting from the bypass.
- d. The permittee has the burden of establishing that each of the conditions of Provision II.C.1.b. or c. have been met to qualify for an exception to the general prohibition against bypassing contained in a. and an exemption, where applicable, from the discharge limitations specified in Provision I. A. of this permit.

2. Upset

- a. A discharge which results from an upset need not meet the discharge limitations specified in Provision I. A. of this permit if:
 - (1) No later than 24-hours after becoming aware of the occurrence of the upset, the permittee orally reports the occurrence and circumstances of the upset to the Director or his designee; and
 - (2) No later than five (5) days after becoming aware of the occurrence of the upset, the permittee furnishes the Director with evidence, including properly signed, contemporaneous operating logs, or other relevant evidence, demonstrating that (i) an upset occurred; (ii) the permittee can identify the specific cause(s) of the upset; (iii) the permittee's facility was being properly operated at the time of the upset; and (iv) the permittee promptly took all reasonable steps to minimize any adverse impact on human health or the environment resulting from the upset.
- b. The permittee has the burden of establishing that each of the conditions of Provision II. C.2.a. of this permit have been met to qualify for an exemption from the discharge limitations specified in Provision I.A. of this permit.

D. DUTY TO COMPLY WITH PERMIT, RULES, AND STATUTES

1. Duty to Comply

- a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the AWPCA and the FWPCA and is grounds for enforcement action, for permit termination, revocation and reissuance, suspension, modification; or denial of a permit renewal application.
- b. The necessity to halt or reduce production or other activities in order to maintain compliance with the conditions of the permit shall not be a defense for a permittee in an enforcement action.
- c. The discharge of a pollutant from a source not specifically identified in the permit application for this permit and not specifically included in the description of an outfall in this permit is not authorized and shall constitute noncompliance with this permit.
- d. The permittee shall take all reasonable steps, including cessation of production or other activities, to minimize or prevent any violation of this permit or to minimize or prevent any adverse impact of any permit violation.
- e. Nothing in this permit shall be construed to preclude and negate the permittee's responsibility or liability to apply for, obtain, or comply with other ADEM, Federal, State, or Local Government permits, certifications, licenses, or other approvals.

2. Removed Substances

Solids, sludges, filter backwash, or any other pollutant or other waste removed in the course of treatment or control of wastewaters shall be disposed of in a manner that complies with all applicable Department Rules.

3. Loss or Failure of Treatment Facilities

Upon the loss or failure of any treatment facilities, including but not limited to the loss or failure of the primary source of power of the treatment facility, the permittee shall, where necessary to maintain compliance with the discharge limitations specified in Provision I. A. of this permit, or any other terms or conditions of this permit, cease, reduce, or otherwise control production and/or all discharges until treatment is restored. If control of discharge during loss or failure of the primary source of power is to be accomplished by means of alternate power sources, standby generators, or retention of inadequately treated effluent, the permittee must furnish to the Director within six months a certification that such control mechanisms have been installed.

4. Compliance with Statutes and Rules

- a. This permit has been issued under ADEM Administrative Code, Chapter 335-6-6. All provisions of this chapter, that are applicable to this permit, are hereby made a part of this permit. A copy of this chapter may be obtained for a small charge from the Office of General Counsel, Alabama Department of Environmental Management, 1400 Coliseum Blvd., Montgomery, AL 36130.
- b. This permit does not authorize the noncompliance with or violation of any Laws of the State of Alabama or the United States of America or any regulations or rules implementing such laws. FWPCA, 33 U.S.C. Section 1319, and Code of Alabama 1975, Section 22-22-14.

E. PERMIT TRANSFER, MODIFICATION, SUSPENSION, REVOCATION, AND REISSUANCE

1. Duty to Reapply or Notify of Intent to Cease Discharge

- a. If the permittee intends to continue to discharge beyond the expiration date of this permit, the permittee shall file a complete permit application for reissuance of this permit at least 180 days prior to its expiration. If the permittee does not intend to continue discharge beyond the expiration of this permit, the permittee shall submit written notification of this intent which shall be signed by an individual meeting the signatory requirements for a permit application as set forth in ADEM Administrative Code Rule 335-6-6-.09.
- b. Failure of the permittee to apply for reissuance at least 180 days prior to permit expiration will void the automatic continuation of the expiring permit provided by ADEM Administrative Code Rule 335-6-6-.06 and should the permit not be reissued for any reason any discharge after expiration of this permit will be an unpermitted discharge.

2. Change in Discharge

- a. The permittee shall apply for a permit modification at least 180 days in advance of any facility expansion, production increase, process change, or other action that could result in the discharge of additional pollutants or increase the quantity of a discharged pollutant such that existing permit limitations would be exceeded or that could result in an additional discharge point. This requirement applies to pollutants that are or that are not subject to discharge limitations in this permit. No new or increased discharge may begin until the Director has authorized it by issuance of a permit modification or a reissued permit.
- b. The permittee shall notify the Director as soon as it is known or there is reason to believe:
 - (1) That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
 - (i) one hundred micrograms per liter;
 - (ii) two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4dinitrophenol and for 2-methyl-4,6-dini-trophenol; and one milligram per liter for antimony;
 - (iii) five times the maximum concentration value reported for that pollutant in the permit application; or
 - (2) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

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

3. Transfer of Permit

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

4. Permit Modification and Revocation

- a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:
 - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;
 - (2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or
 - (3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.
- b. This permit may be modified during its term for cause, including but not limited to, the following:
 - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;
 - (2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;
 - (3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;
 - (4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;
 - (5) Errors in calculation of discharge limitations or typographical or clerical errors were made;
 - (6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;
 - (7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;
 - (8) To agree with a granted variance under 30l(c), 30l(g), 30l(h), 30l(k), or 316(a) of the FWPCA or for fundamentally different factors;
 - (9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;
 - (10) When required by the reopener conditions in this permit;
 - (11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);

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

5. Permit Termination

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

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

6. Permit Suspension

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

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

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

F. COMPLIANCE WITH TOXIC POLLUTANT STANDARD OR PROHIBITION

If any applicable effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a), for a toxic pollutant discharged by the permittee and such standard or prohibition is more stringent than any discharge limitation on the pollutant specified in Provision I. A. of this permit, or controls a pollutant not limited in Provision 1. A. of this permit, this permit shall be modified to conform to the toxic pollutant effluent standard or prohibition and the permittee shall be notified of such modification. If this permit has not been modified to conform to the toxic pollutant effluent standard or prohibition before the effective date of such standard or prohibition, the permittee shall attain compliance with the requirements of the standard or prohibition until this permit is modified or reissued.

G. DISCHARGE OF WASTEWATER GENERATED BY OTHERS

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

PART III: OTHER PERMIT CONDITIONS

A. CIVIL AND CRIMINAL LIABILITY

1. Tampering

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

2. False Statements

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

3. Permit Enforcement

- a. Any NPDES permit issued or reissued by the Department is a permit for the purpose of the AWPCA and the FWPCA and as such any terms, conditions, or limitations of the permit are enforceable under state and federal law.
- b. Any person required to have a NPDES permit pursuant to ADEM Administrative Code Chapter 335-6-6 and who discharges pollutants without said permit, who violates the conditions of said permit, who discharges pollutants in a manner not authorized by the permit, or who violates applicable orders of the Department or any applicable rule or standard of the Department, is subject to any one or combination of the following enforcement actions under applicable state statutes.
 - (1) An administrative order requiring abatement, compliance, mitigation, cessation, clean-up, and/or penalties;
 - (2) An action for damages;
 - (3) An action for injunctive relief; or
 - (4) An action for penalties.
- c. If the permittee is not in compliance with the conditions of an expiring or expired permit the Director may choose to do any or all of the following provided the permittee has made a timely and complete application for reissuance of the permit:
 - (1) initiate enforcement action based upon the permit which has been continued;
 - (2) issue a notice of intent to deny the permit reissuance. If the permit is denied, the owner or operator would then be required to cease the activities authorized by the continued permit or be subject to enforcement action for operating without a permit;
 - (3) reissue the new permit with appropriate conditions; or
 - (4) take other actions authorized by these rules and AWPCA.

4. Relief from Liability

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

B. OIL AND HAZARDOUS SUBSTANCE LIABILITY

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

C. PROPERTY AND OTHER RIGHTS

This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to persons or property or invasion of other private rights, trespass, or any infringement of federal, state, or local laws or regulations, nor does it authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any waters of the state or of the United States.

D. AVAILABILITY OF REPORTS

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

E. EXPIRATION OF PERMITS FOR NEW OR INCREASED DISCHARGES

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

F. COMPLIANCE WITH WATER QUALITY STANDARDS

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

G. GROUNDWATER

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

H. DEFINITIONS

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

- 3. <u>Arithmetic Mean</u> means the summation of the individual values of any set of values divided by the number of individual values.
- 4. <u>AWPCA</u> means the Alabama Water Pollution Control Act.
- 5. <u>BOD</u> means the five-day measure of the pollutant parameter biochemical oxygen demand.
- 6. <u>Bypass</u> means the intentional diversion of waste streams from any portion of a treatment facility.
- 7. <u>CBOD</u> means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.
- 8. <u>Daily discharge</u> means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.
- 9. <u>Daily maximum</u> means the highest value of any individual sample result obtained during a day.
- 10. Daily minimum means the lowest value of any individual sample result obtained during a day.
- 11. Day means any consecutive 24-hour period.
- 12. Department means the Alabama Department of Environmental Management.
- 13. Director means the Director of the Department.
- 14. <u>Discharge</u> means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other wastes into waters of the state". Code of Alabama 1975, Section 22-22-1(b)(8).
- 15. <u>Discharge Monitoring Report (DMR)</u> means the form approved by the Director to accomplish reporting requirements of an NPDES permit.
- 16. DO means dissolved oxygen.
- 17. <u>8HC</u> means 8-hour composite sample, including any of the following:
 - a. The mixing of at least 5 equal volume samples collected at constant time intervals of not more than 2 hours over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
 - b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
- 18. EPA means the United States Environmental Protection Agency.
- 19. FC means the pollutant parameter fecal coliform.
- 20. Flow means the total volume of discharge in a 24-hour period.
- 21. <u>FWPCA</u> means the Federal Water Pollution Control Act.
- 22. <u>Geometric Mean</u> means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).
- 23. <u>Grab Sample</u> means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.
- 24. <u>Indirect Discharger</u> means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.
- 25. <u>Industrial User</u> means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category "Division D Manufacturing" and such other classes of significant waste producers as, by regulation, the Director deems appropriate.
- 26. MGD means million gallons per day.

- 27. <u>Monthly Average</u> means, other than for fecal coliform bacteria, the arithmetic mean of the entire composite or grab samples taken for the daily discharges collected in one month period. The monthly average for fecal coliform bacteria is the geometric mean of daily discharge samples collected in a one month period. The monthly average for flow is the arithmetic mean of all flow measurements taken in a one month period.
- 28. <u>New Discharger</u> means a person, owning or operating any building, structure, facility or installation:
 - a. from which there is or may be a discharge of pollutants;
 - b. that did not commence the discharge of pollutants prior to August 13, 1979, and which is not a new source; and
 - c. which has never received a final effective NPDES permit for dischargers at that site.
- 29. <u>NH3-N</u> means the pollutant parameter ammonia, measured as nitrogen.
- 30. <u>Permit application</u> means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.
- 31. <u>Point source</u> means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, . . . from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. Section 1362(14).
- 32. <u>Pollutant</u> includes for purposes of this permit, but is not limited to, those pollutants specified in Code of Alabama 1975, Section 22-22-1(b)(3) and those effluent characteristics specified in Provision I. A. of this permit.
- 33. <u>Privately Owned Treatment Works</u> means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a "POTW".
- 34. <u>Publicly Owned Treatment Works</u> means a wastewater collection and treatment facility owned by the State, municipality, regional entity composed of two or more municipalities, or another entity created by the State or local authority for the purpose of collecting and treating municipal wastewater.
- 35. Receiving Stream means the "waters" receiving a "discharge" from a "point source".
- 36. <u>Severe property damage</u> means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
- 37. <u>Significant Source</u> means a source which discharges 0.025 MGD or more to a POTW or greater than five percent of the treatment work's capacity, or a source which is a primary industry as defined by the U.S. EPA or which discharges a priority or toxic pollutant.
- 38. <u>Solvent</u> means any virgin, used or spent organic solvent(s) identified in the F-Listed wastes (F001 through F005) specified in 40 CFR 261.31 that is used for the purpose of solubilizing other materials.
- 39. TKN means the pollutant parameter Total Kjeldahl Nitrogen.
- 40. TON means the pollutant parameter Total Organic Nitrogen.
- 41. <u>TRC</u> means Total Residual Chlorine.
- 42. TSS means the pollutant parameter Total Suspended Solids.
- 43. <u>24HC</u> means 24-hour composite sample, including any of the following:
 - a. the mixing of at least 12 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;
 - b. a sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected; or
 - c. a sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.

- 44. <u>Upset</u> means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- 45. <u>Waters</u> means "[a]ll waters of any river, stream, watercourse, pond, lake, coastal, ground or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely upon the property of a single individual, partnership or corporation unless such waters are used in interstate commerce." Code of Alabama 1975, Section 22-22-1(b)(2). Waters "include all navigable waters" as defined in Section 502(7) of the FWPCA, 22 U.S.C. Section 1362(7), which are within the State of Alabama.
- 46. <u>Week</u> means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.
- 47. Weekly (7-day and calendar week) Average is the arithmetic mean of all samples collected during a consecutive 7-day period or calendar week, whichever is applicable. The calendar week is defined as beginning on Sunday and ending on Saturday. Weekly averages shall be calculated for all calendar weeks with Saturdays in the month. If a calendar week overlaps two months (i.e., the Sunday is in one month and the Saturday in the following month), the weekly average calculated for the calendar week shall be included in the data for the month that contains the Saturday.

I. SEVERABILITY

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

PART IV: ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS

A. BEST MANAGEMENT PRACTICES (BMP) PLAN REQUIREMENTS

1. BMP Plan

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

2. Plan Content

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

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

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

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

3. Compliance Schedule

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

4. Department Review

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

5. Administrative Procedures

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

B. STORMWATER FLOW MEASUREMENT AND SAMPLING REQUIREMENTS

1. Stormwater Flow Measurement

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

2. Stormwater Sampling

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

ADEM PERMIT RATIONALE

PREPARED DATE: February 21, 2025 PREPARED BY: Ed Hughes

Permittee Name: Koppers Utility & Industrial Products

Facility Name: Koppers Utility and Industrial Products Inc. Kennedy Plant

Permit Number: AL0066184

PERMIT IS REISSUANCE DUE TO EXPIRATION

DISCHARGE SERIAL NUMBERS (DSN) & DESCRIPTIONS:

DSN001 & DSN002: Stormwater runoff associated with lumber and wood products including treatment operations using inorganic preservatives containing chromium, copper and arsenic

DSN003 & DSN005: Stormwater runoff associated with lumber and wood products including treatment operations using inorganic preservatives containing chromium, copper and arsenic, formulations using DCOI and the former use of chlorophenolics

DSN006: Stormwater runoff associated with storage of raw lumber and wood

DSN007 & DSN008: Stormwater runoff associated with storage of lumber and wood products treated with preservatives

INDUSTRIAL CATEGORY: 40 CFR Part 429 – Timber Products Processing Point Source Category Subpart G – Wood Preserving Steam Subcategory

MAJOR: No

STREAM INFORMATION:

Receiving Stream:	Unnamed Tributaries to Luxapallila Creek
Classification:	Fish & Wildlife
River Basin:	Tombigbee
7Q10:	0 cfs
1Q10:	0 cfs
303(d) List:	No
Impairment:	N/A
TMDL:	No

DISCUSSION:

Koppers operates a wood treating facility utilizing preservatives containing Copper, Chromium and Arsenic and DCOI and previously used Chlorophenolic formulations. This activity is regulated under 40 CFR 429 Subpart G – Wood Preserving Steam Category. This subpart established limits for the discharge of process wastewaters but not for stormwater runoff. Process wastewater is not discharged from this site and is not allowed to be discharged into navigable waters under 40 CFR Part 429. This permit authorizes the discharge of stormwater only. Stormwater runoff associated with this activity is discharged through existing outfalls, DSN001, 002, 003, 004 and 005.

Treatment with Copper, Chromium and Arsenic and DCOI preservatives occurs in the areas discharging to DSN003 and 005. It should be noted that chlorophenolics treatment formerly occurred in these areas but is being phased out and replaced with DCOI. Stormwater that discharges through outfalls DSN001, 002 and 004 is associated with lumber that is treated with Copper, Chromium and Arsenic only.

Three new outfalls are being added in this issuance: DSN006, DSN007 and DSN008. No treatment has or will occur in the area associated with outfall DSN006 which is for raw wood storage only. The facility is using the area associated with outfalls DSN007 and 008 for storage of treated lumber.

Outfall DSN004 is being removed in this issuance because it drains to DSN003 where it is tested for Copper, Chromium, and Arsenic.

ADEM Administrative Rule 335-6-10-.12 requires applicants to new or expanded discharges to Tier II waters demonstrate that the proposed discharge is necessary for important economic or social development in the area in which the waters are located. The application submitted by the facility is for a new or expanded discharge. Therefore, the applicant is required to demonstrate that the discharges are necessary for economic and social development and the anti-degradation rationale is attached.

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

DSN001Q, DSN002Q: Stormwater runoff associated with lumber and wood products including treatment operations using inorganic preservatives containing chromium, copper and arsenic.

Parameter	Quantity	or Loading	Units	Qı	ality or Concentratio	on	Units	Sample Freq	Sample Type	Seasonal	Basis
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	****	****	*****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months	BPJ
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Arsenic, Total Recoverable (00978) Effluent Gross Value	****	****	*****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Chromium Total Recoverable (01118) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Copper Total Recoverable (01119) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months	BPJ

DSN003Q, DSN005Q: Stormwater runoff associated with lumber and wood products including treatment operations using inorganic preservatives containing chromium, copper and arsenic, formulations using DCOI and the former use of chlorophenolics.

Parameter	Quantity	or Loading	Units	Qı	ality or Concentratio	on	Units	Sample Freq	Sample Type	Seasonal	Basis
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months	BPJ
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Arsenic, Total Recoverable (00978) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Chromium Total Recoverable (01118) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Copper Total Recoverable (01119) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Purgeable Aromatic Method 602 (03771) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	ALL Months	BPJ
Benzene (34030) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
2,4,6-Trichlorophenol (34621) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
4-Nitrophenol (34646) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Phenol, Single Compound (34694) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Pentachlorophenol (39032) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months	BPJ

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type	Seasonal	Basis
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months	BPJ
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months	BPJ

DSN007Q, DSN008Q: Stormwater runoff associated with storage of lumber and wood products treated with preservatives.

Parameter	Quantity or Loading		Units	Quality or Concentration		Units	Sample Freq	Sample Type	Seasonal	Basis	
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	Bbl
pH (00400) Effluent Gross Value	****	****	****	(Report) Minimum Daily	****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months	Bbì
Solids, Total Suspended (00530) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	Bbì
Oil & Grease (00556) Effluent Gross Value	****	****	****	****	****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months	Bbì
Arsenic, Total Recoverable (00978) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	Bbì
Chromium Total Recoverable (01118) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	Bbì
Copper Total Recoverable (01119) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	Bbì
Purgeable Aromatic Method 602 (03771) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	Mg/l	Quarterly	Grab	All Months	ВЫ
Pentachlorophenol (39032) Effluent Gross Value	****	****	****	****	****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	****	(Report) Maximum Daily	MGD	****	****	****	****	Quarterly	Estimate	All Months	BPJ

*Basis for Permit Limitation

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

Discussion

DSN001Q, DSN002Q: Stormwater runoff associated with lumber and wood products including treatment operations using inorganic preservatives containing chromium, copper and arsenic

Best Professional Judgment (BPJ)

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

Oil & Grease

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

Total Recoverable (TR) Copper, TR Chromium, TR Arsenic, Total Suspended Solids (TSS), Biochemical Oxygen Demand 5-Day (BOD5), pH

The listed pollutants are expected to be present due to the nature of the operation. Quarterly monitoring is proposed to be continued to evaluate the effectiveness of the facility's BMP measures. The previous permit required the facility to implement measures to reduce the levels of Copper, Chromium and Arsenic at these outfalls. A review of the DMR data for the past 60 months indicates a significant reduction in the level of these pollutants. As allowed in the existing permit, monitoring at DSN001 shall be considered representative of DSN002.

DSN004Q

This outfall is being removed from the permit because stormwater runoff from this area where CCA treatment is performed drains to DSN003 where testing for these pollutants is required by the permit.

DSN003Q, DSN005Q: Stormwater runoff associated with lumber and wood products including treatment operations using inorganic preservatives containing chromium, copper and arsenic, formulations using DCOI and the former use of chlorophenolics

Best Professional Judgment (BPJ)

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

Oil & Grease

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

TR Copper, TR Chromium, TR Arsenic, Phenol, Pentachlorophenol, 2,4,6–Trichlorophenol, 4– Nitrophenol, TSS

Quarterly monitoring is being continued to measure the effectiveness of the facility's BMP measures. The previous permit required the facility to implement measures to reduce the level of TSS and Arsenic at DSN003. A comparison of past versus current DMR data reveals significant reductions in the reported value for these parameters indicating the effectiveness of the facility's minimization efforts.

Total Purgeable Aromatics

Treatment with pentachlorophenol is being phased out and replaced with treatment using DCOI (4,5-Dichloro-2-octyl 3(2H)-isothiazolone). None of the current parameters will be effective in measuring the presence of DCOI. There is no specific analytical method for DCOI; however, Total Purgeable Aromatics has been determined to be an appropriate surrogate, because the primary ingredient in concentrated DCOI is heavier aromatic compounds. Oil & Grease will also serve as an indicator for DCOI, as the treatment solution is oil based.
Discharge Characteristics

The facility is currently updating EPA Form 2F to include data for the three new outfalls being added in this permit issuance: DSN006, DSN007, and DSN008. The monitoring requirements and limitations for these outfalls are based on expected discharge concentrations found at the other permitted outfalls at the site and are similar to the requirements found at similar discharges at other permitted facilities in the state. Upon review of the updated EPA Form 2F, the Department will make any appropriate revisions to the permit.

DSN006Q: Storm water runoff associated with storage of untreated lumber

This is a new outfall which discharges stormwater runoff associated with the storage of untreated lumber.

Best Professional Judgment (BPJ)

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

Oil & Grease

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

BOD5, TSS, Oil & Grease, pH

Quarterly monitoring for these parameters will measure the effectiveness of the facility's BMP plan.

DSN007Q, 008Q: Stormwater runoff associated with storage of lumber and wood products treated with preservatives

The facility has expanded the plant to allow for additional storage of treated lumber. Stormwater runoff from this area will discharge through new outfalls DSN007 and DSN008.

Best Professional Judgment (BPJ)

The parameters of concern for these outfalls are based on the parameters of concern listed in EPA form 2F and from other currently permitted outfalls at the site with similar sources contributing to the stormwater discharges. These parameters are consistent with similar facilities in the state and have been proven to be reflective of the operations at this facility. The parameters with specific limits are discussed below:

Oil & Grease

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

TR Copper, TR Chromium, TR Arsenic, Pentachlorophenol, Total Purgeable Aromatics, BOD5, TSS, pH

Quarterly monitoring of the above parameters is being required to measure the effectiveness of the facility's BMP measures.

Best Management Practices (BMP) Plan

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

Compliance Schedule

The permit will require the submission of an updated BMP plan to include the areas discharging to outfalls DSN006, 007 and 008. The revised plan is required to be received by the Department no later than 180 days from the permit effective date. This schedule of compliance can be found in Part I.E.3. of the permit.

Anti-degradation

The operation has been expanded resulting in the addition of three new outfalls, DSN006, 007 and 008. These outfalls discharge to a tier two stream, so the applicant is required to demonstrate that the discharges are necessary for economic or social development. The facility has submitted the required information which has been reviewed by the Department, and it has been determined that the applicant has met the Antidegradation requirements in accordance with ADEM regulations. The anti-degradation rationale is attached.



KAY IVEY GOVERNOR

Alabama Department of Environmental Management adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 Post Office Box 301463 Montgomery, Alabama 36130-1463 (334) 271-7700 FAX (334) 271-7950

ANTIDEGRADATION RATIONALE

Permit Number:AL0066184Facility Name:Koppers Utility and Industrial Products Inc. Kennedy PlantReceiving water:Unnamed Tributary to Luxapallila CreekStream Category:Tier 2 as defined by ADEM Admin. Code 335-6-10-.12Discharge Description:Stormwater runoff associated with industrial activity

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

The Department has reviewed the information submitted by applicant in accordance with ADEM Admin. Code 335-6-10-.12 (9). The applicant has demonstrated that there are no alternative options which are economically feasible or technically viable.

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

- Expansion of the storage area allows increased production and sales, which results in greater tax revenues for state and local governments.
- The larger storage area will allow for increased inventory of utility poles which can be in critical need immediately following severe weather events.

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

Prepared By: Scott Ja Date: Februar

Scott Jackson February 21, 202



Birmingham Office 110 Vulcan Road Birmingham, AL 35209-4702 (205) 942-6168 (205) 941-1603 (FAX) Decatur Office 2715 Sandlin Road, S.W. Decatur, AL 35603-1333 (256) 353-1713 (256) 340-9359 (FAX) **Coastal Office** 1615 South Broad Street Mobile, AL 36605 (251) 450-3400 (251) 479-2593 (FAX)

Pinson, Theo

From:Palm, Zackary T < PalmZT@koppers.com>Sent:Thursday, April 17, 2025 9:08 AMTo:Pinson, Theo; Wiseman, Kevin WSubject:Additional Information - Outfalls 001, 003, 005Attachments:EPA 2F Table A Outfall 1,3,5.pdf

Zackary Palm

Zero Harm Coordinator

Mobile: 601-519-2792

16851 Hwy 96 Kennedy Alabama 35576



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Pinson, Theo

From: Pinson, Theo Sent: Tuesday, April 15, 2025 5:21 PM To: Wiseman, Kevin W <WisemanKW@koppers.com> Cc: Palm, Zackary T <PalmZT@koppers.com>; Olson, Cory J <OlsonCJ@koppers.com> Subject: RE: EPA Form 2F

Kevin,

Ideally, we do want the data on Form 2F. I think it would be sufficient to update the Table A for those outfalls and email just those pages.

Thank you,

Theo

Theo Pinson Industrial Section Water Division Alabama Department of Environmental Management (334) 274 – 4202

NEW ADEM ELECTRONIC SYSTEM: Alabama Environmental Permitting and Compliance System (AEPACS)

AEPACS is an electronic system that allows facilities to apply for and maintain permits as well as submit other required applications, registrations, and certifications. In addition, the system allows facilities to submit required compliance reports or other information to the Department. For general information about AEPACS, visit http://adem.alabama.gov/egov/AEPACS.cnt. For NPDES and SID program specific information about AEPACS, visit http://adem.alabama.gov/egov/AEPACS.cnt. For NPDES and SID program specific information about AEPACS, visit http://adem.alabama.gov/egov/AEPACS.cnt. For NPDES and SID program specific information about AEPACS, visit http://adem.alabama.gov/egov/AEPACS.cnt.

If you have questions or need assistance with AEPACS, please contact the ADEM Web Portal/AEPACS Help Desk at <u>ademwebportal@adem.alabama.gov</u>. The email box is monitored Monday through Friday, 7:00 am –5:00 pm.

From: Wiseman, Kevin W <<u>WisemanKW@koppers.com</u>> Sent: Tuesday, April 15, 2025 5:00 PM To: Pinson, Theo <<u>tpinson@adem.alabama.gov</u>> Cc: Palm, Zackary T <<u>PalmZT@koppers.com</u>>; Olson, Cory J <<u>OlsonCJ@koppers.com</u>> Subject: RE: EPA Form 2F

Theo,

We were able to get that information when we received rain later in the fall.

Would you like that information sent to you? If so, does it need to be on the EPA form?

Kevin Wiseman Senior Zero Harm Manager Phone: 931-802-3678 436 Seventh Ave, Pittsburgh, PA 15219



From: Pinson, Theo <<u>tpinson@adem.alabama.gov</u>> Sent: Tuesday, April 15, 2025 10:46 AM To: Wiseman, Kevin W <<u>WisemanKW@koppers.com</u>> Cc: Palm, Zackary T <<u>PalmZT@koppers.com</u>>; Olson, Cory J <<u>OlsonCJ@koppers.com</u>> Subject: RE: EPA Form 2F

WARNING: External Sender

Kevin,

ð

It does look like we are removing outfall 004 from the permit with the justification that it now discharges through outfall 003 so we do not need data for it. Do you know if COD, phosphorus, TKN, and nitrogen data is available for Outfalls 001, 003, and 005? The current permit doesn't require those

parameters so they were left blank on the Form 2F when it was submitted. Do you know if you went back and collected those parameters after the application was submitted?

Thank you,

Theo

Theo Pinson Industrial Section Water Division Alabama Department of Environmental Management (334) 274 – 4202

NEW ADEM ELECTRONIC SYSTEM: Alabama Environmental Permitting and Compliance System (AEPACS)

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If you have questions or need assistance with AEPACS, please contact the ADEM Web Portal/AEPACS Help Desk at <u>ademwebportal@adem.alabama.gov</u>. The email box is monitored Monday through Friday, 7:00 am –5:00 pm.

From: Wiseman, Kevin W <<u>WisemanKW@koppers.com</u>> Sent: Friday, April 11, 2025 2:28 PM To: Pinson, Theo <<u>tpinson@adem.alabama.gov</u>> Cc: Palm, Zackary T <<u>PalmZT@koppers.com</u>>; Olson, Cory J <<u>OlsonCJ@koppers.com</u>> Subject: RE: EPA Form 2F

Theo,

I do not have anything for outfall 4.

I am asking Zackary, I really do not think that it flows there anymore.

Kevin Wiseman

Senior Zero Harm Manager Phone: 931-802-3678 436 Seventh Ave, Pittsburgh, PA 15219



From: Pinson, Theo <<u>tpinson@adem.alabama.gov</u>> Sent: Friday, April 11, 2025 2:25 PM To: Wiseman, Kevin W <<u>WisemanKW@koppers.com</u>> Cc: Palm, Zackary T <<u>PalmZT@koppers.com</u>>; Olson, Cory J <<u>OlsonCJ@koppers.com</u>> Subject: RE: EPA Form 2F

WARNING: External Sender

Kevin,

Thanks for sending. Do you know if there is one available for Outfall 004?

Thank you,

Theo

Theo Pinson Industrial Section Water Division <u>Alabama Department of Environmental Management</u> (334) **274** – 4202

NEW ADEM ELECTRONIC SYSTEM: Alabama Environmental Permitting and Compliance System (AEPACS)

AEPACS is an electronic system that allows facilities to apply for and maintain permits as well as submit other required applications, registrations, and certifications. In addition, the system allows facilities to submit required compliance reports or other information to the Department. For general information about AEPACS, visit http://adem.alabama.gov/egov/AEPACS.cnt. For NPDES and SID program specific information about AEPACS, visit http://adem.alabama.gov/egov/AEPACS.cnt.

If you have questions or need assistance with AEPACS, please contact the ADEM Web Portal/AEPACS Help Desk at <u>ademwebportal@adem.alabama.gov</u>. The email box is monitored Monday through Friday, 7:00 am –5:00 pm.

From: Wiseman, Kevin W <<u>WisemanKW@koppers.com</u>> Sent: Friday, April 11, 2025 2:21 PM To: Pinson, Theo <<u>tpinson@adem.alabama.gov</u>> Cc: Palm, Zackary T <<u>PalmZT@koppers.com</u>>; Olson, Cory J <<u>OlsonCJ@koppers.com</u>> Subject: EPA Form 2F

Theo,

I have attached the EPA form 2F for Outfall 2, 6, 7, and 8.

If there is anything else you need, please reach out to me.

Thanks,

Kevin Wiseman Senior Zero Harm Manager Phone: 931-802-3678 436 Seventh Ave, Pittsburgh, PA 15219



	EPA Identification Number NF ALD067127225	DES Permit Number AL0066184	Facility Nam Koppers In	e ic.	Outfall Number 001	Form Approved 03/05/ OMB No. 2040-00	
TAR	BLE A. CONVENTIONAL AND NON CON	VENTIONAL PARAMETER	RS (40 CFR 122.26(c)(1)(i)(E)(3)) ¹	See instructions for a	dditional details and requ	irements
100	That provide the results of at least one a	Maximum Dai (specify	ly Discharge	Average Dail	y Discharge		Source of
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	- Number of Storm Events Sampled	(new source/new dischargers only; use codes in instructions)
1.	Oil and grease	0 mg/L		0 mg/L		11	a
2.	Biochemical oxygen demand (BODs)	46.2 mg/L		13.1 mg/l		11	
3.	Chemical oxygen demand (COD)	82.0 mg/L		82.0 mg/L		1	
4.	Total suspended solids (TSS)	242 mg/L		87 mg/L		11	
5.	Total phosphorus	0.21 mg/L		0.21 mg/L	and a state way to be a state of the state o	1	
6.	Total Kjeldahl nitrogen (TKN)	0.91 mg/L		0.91 mg/L		1	and the second se
7.	Total nitrogen (as N)	1.2 mg/L		1.2 mg/L		1	
	pH (minimum)	6.92					
8.	pH (maximum)	8.43					

EPA Identification Number ALD067127225	NPDE	ES Permit Number AL0066184	Facility Nam Koppers In	10 IC,	Outfall Number 001		Form Approved 03/05/1 OMB No. 2040-000
TABLE B CERTAIN CONVENTION List each pollutant that is limited in an facility is operating under an existing	AL AND NO n effluent lin NPDES pe	ON CONVENTIONAL PO nitation guideline (ELG) ti rmit). Complete one table	LLUTANTS (40 CFF nat the facility is subje for each outfall. See	R 122.26(c)(1)(l)(E)(4) and not to or any pollutant listed the instructions for additio	40 CFR 122.21(g)(7) d in the facility's NPDE nal details and require	(vi)(A))! S permit for its process ements.	wastewater (if the
		Maximum Dall	y Discharge	Average Daily	Discharge		Source of
Pollutant and CAS Number (If av	vailable)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	¹ Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
N/A							
			a				

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EPA Identification Number ALD067127225	NPD	ES Permit Number AL0066184	Facility Nam Koppers in	e ic.	Outfall Number 001		Form Approved 03/05/19 OMB No. 2040-0004
TABLE C. TOXIC POLLUTANTS, C List each pollutant shown in Exhibits details and requirements.	ERTAIN H 2F-2, 2F-	AZARDOUS SUBSTANC 3, and 2F–4 that you know	ES, AND ASBESTO v or have reason to b	S (40 CFR 122.26(c)(1)(i) elleve is present. Complet	(E)(4) and 40 CFR 12. e one table for each of	2.21(g)(7)(vi)(B) and (v utfall. See the instruction	ii)) ¹ ns for additional
		Maximum Dall	y Discharge	Average Daily (specify	Discharge		Source of
Pollutant and CAS Number (if available)		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only, use codes in instructions)
Arsenic		1.1 mg/L		0.34881 mg/L		11	ted/ Untreated Wood
Chromium		2.7 mg/L		0.714 mg/L		11	ted/Untreated Wood
Copper	****	0.670 mg/L		0.202 mg/L		11	ted/Untreated Wood

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	EPA Identification Number N ALD067127225	IPDES Permit Number AL0066184	DES Permit Number Facility Nam AL0066184 Koppers In		e Outfall Number c. 002		Form Approved 03/05/19 OMB No. 2040-0004
TAE	BLE A. CONVENTIONAL AND NON CO must provide the results of at least one a	NVENTIONAL PARAMETE	RS (40 CFR 122.26(c this table. Complete)(1)(i)(E)(3)) ¹ one table for each outfall.	See instructions for a	dditional details and reg	uirements.
		Maximum Dai (specify	ly Discharge units)	Average Dail	y Discharge units)		Source of
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
1.	Oil and grease	0 mg/L		0 mg/L		1	Treated/ Untreated
2.	Biochemical oxygen demand (BOD5)	1.59 mg/L		1.59 mg/L		1	Treated/ Untreated
3.	Chemical oxygen demand (COD)	24 mg/L		24.mg/L		1	Treated/ Untreated
4.	Total suspended solids (TSS)	ND		ND		1	Treated/ Untreated
5.	Total phosphorus	ND		ND		1	Treated/Untreated
6.	Total Kjeldahl nitrogen (TKN)	0.60		0.60	_	1	Treated/Untreated
7.	Total nitrogen (as N)	0.64		0.64		1	Treated/Untreated
	pH (minimum)	7.64					
8.	pH (maximum)	7.64					

EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Facility N Kopper	Name s Inc.	Outfall Number 002		Form Approved 03/05/19 OMB No. 2040-0004
TABLE B. CERTAIN CONVENTIONAL List each pollutant that is limited in an ef facility is operating under an existing NP	AND NON CONVENTIOn fluent limitation guideline DES permit). Complete	ONAL POLLUTANTS (40 C (ELG) that the facility is su one table for each outfall. S	CFR 122.26(c)(1)(i)(E)(4) and ubject to or any pollutant liste See the instructions for additi	d <u>40 CFR 122.21(g)(7)</u> ed in the facility's NPDE onal details and require	(vi)(A)) ¹ S permit for its process ements.	wastewater (if the
	Maxin	(specify units)	Average Dail	y Discharge	- Number of Storm Events Sampled	Source of
Pollutant and CAS Number (if availa	able) Grab Sample During Fi 30 Minute	Taken rst Flow-Weighted composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		(new source/new dischargers only; use codes in instructions)
N/A						

EPA Identification Number ALD067127225	PA Identification Number NPDES Permit Number ALD067127225 AL0066184		Facility Name C Koppers Inc.		Outfall Number 002		Form Approved 03/05/19 OMB No. 2040-0004	
TABLE C. TOXIC POLLUTANTS, C List each pollutant shown in Exhibits details and requirements.	ERTAIN H/ 2F-2, 2F-3	ZARDOUS SUBSTANC 3, and 2F-4 that you know	ES, AND ASBESTO wor have reason to b	S (40 CFR 122.26(c)(1)(i) elieve is present. Complete	(E)(4) and 40 CFR 12 e one table for each or	2.21(g)(7)(vi)(B) and (v utfall. See the instruction	ii))1 ns for additional	
an a		Maximum Dail	y Discharge	Average Daily	y Discharge	1990 1 2 1	Source of	
Pollutant and CAS Number (if available)		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Sample Taken During First 30 Minutes		(new source/new dischargers only; use codes in instructions)	
Arsenic		ND		ND		1	d/Untreated Wood S	
Chromium		ND		ND		1	d/Untreated Wood S	
Copper		ND		ND		1	d/Untreated Wood S	

	EPA Identification Number NI ALD067127225	PDES Permit Number AL0066184	Facility Nam Koppers In	e c.	Outfall Number 003	Form Approved 03/05/ OMB No, 2040-00	
TA	BLE A. CONVENTIONAL AND NON COM	IVENTIONAL PARAMETE	RS (40 CFR 122.26(c this table, Complete)(1)(i)(E)(3)) ¹ one table for each outfall.	See instructions for a	dditional details and requ	uirements.
		Maximum Dai (specify	ly Discharge	Average Daily (specify	y Discharge units)		Source of
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
1.	Oil and grease	0 mg/L		0 mg/L		11	CCA Treated Wood
2.	Biochemical oxygen demand (BODs)	38.6 mg/L		11.5 mg/L		11	CCA Treated Wood
3.	Chemical oxygen demand (COD)	104 mg/L		104 mg/L		1	CCA Treated Wood
4.	Total suspended solids (TSS)	530 mg/L		88 mg/L		11	CCA Treated Wood
5.	Total phosphorus	0.36 mg/L		0.36 mg/L		1	CCA Treated Wood
6.	Total Kjeldahl nitrogen (TKN)	0.55 mg/L		0.55 mg/L		1	CCA Treated Wood
7.	Total nitrogen (as N)	0.55 mg/L		0.55 mg/L		1	CCA Treated Wood
	pH (minimum)	7.05					
8.	pH (maximum)	8.43					

EPA Identification Number ALD067127225	NPDE	S Permit Number ALOO66184	Facility Nam Koppers In	0 C.	Outfall Number 003		Form Approved 03/05/1 OMB No. 2040-000
TABLE B. CERTAIN CONVENTION/ List each pollutant that is limited in an facility is operating under an existing l	AL AND NO effluent lin NPDES pe	DN CONVENTIONAL PC nitation guideline (ELG) ti rmit). Complete one table	DLLUTANTS (40 CFF hat the facility is subje of or each outfall. See	1 122.26(c)(1)(i)(E)(4) and act to or any pollutant listed the instructions for additio	40 CFR 122.21(g)(7) I in the facility's NPDE nal details and require	(vi)(A)) ¹ S permit for its process ements.	wastewater (if the
		Maximum Dail (specify	y Discharge units)	Average Dally (specify	Discharge units)	Number of Storm	Source of
Pollutant and CAS Number (if available)		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only, use codes in instructions)
J/A					anna an		
1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 -							
			t di Malanda Malanda Santa Sata Antonio Ang				
			alang anila, guaranna (1), ann ann an luais i ann ann an lan an ann an ann an ann ann				

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EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Facility Nan Koppers In	10 10.	Outfall Number 003		Form Approved 03/05/19 OMB No. 2040-0004
TABLE C. TOXIC POLLUTANTS, CERTA	N HAZARDOUS SUBSTANC	ES, AND ASBESTO	S (40 CFR 122.26(c)(1)(i)	(E)(4) and 40 CFR 12	2.21(g)(7)(vi)(B) and (v	ii))'
List each pollutant shown in Exhibits 2F-2, details and requirements.	2F-3, and 2F-4 that you know	w or have reason to b	elieve is present. Complet	e one table for each o	utfall. See the instruction	ns for additional
	Maximum Dal (specify	ly Discharge units)	Average Daily (specify	y Discharge units)	Number of Storm	Source of
Pollutant and CAS Number (if available	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
Arsenic	0.45 mg/L		0.09918 mg/L		11	A Treated Wood Stor
Chromium	1.3 mg/L		0.295 mg/L		11	A Treated Wood Stor
Copper	0.430 mg/L		0.097 mg/L		11	A Treated Wood Stor
Benzene	ND		ND		11	Penta Wood Treate
2, 4, 6 TCP.	ND		ND		11	Penta Wood Treate
4-Nitrophenol	ND		ND		11	Penta Wood Treate
Phenol	ND		ND		11	Penta Wood Treate
Pentachlorophenol	0,0152		0.00138		11	Penta Wood Treate
		-				

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

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	EPA Identification Number NI ALD067127225	PDES Permit Number ALOO66184	Facility Nam Koppers In	ne nc.	Outfall Number 005		Form Approved 03/05/19 OMB No. 2040-0004
TA	BLE A. CONVENTIONAL AND NON CON	IVENTIONAL PARAMETE	RS (40 CFR 122.26(c)(1)(i)(E)(3)) ¹	See instructions for a	dditional details and requ	uirements
100	That provide the results of at reast one a	Maximum Dai (specify	ly Discharge units)	Average Daily (specify	y Discharge units)		Source of
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
1.	Oil and grease	0 mg/L		0 mg/L		11	CCA Treated Wood
2.	Biochemical oxygen demand (BODs)	49.2 mg/L		25.4 mg/L		11	CCA Treated Wood
3.	Chemical oxygen demand (COD)	89.0 mg/L		89.0 mg/L		1	CCA Treated Wood
4.	Total suspended solids (TSS)	417 mg/L		140 mg/L		11	CCA Treated Wood
5.	Total phosphorus	0.48 mg/L		0.48 mg/L	1991 - La 1992 A	1	CCA Treated Wood
6.	Total Kjeldahl nitrogen (TKN)	0.49 mg/L		0.49 mg/L		1	CCA Treated Wood
7.	Total nitrogen (as N)	0.50 mg/L		0.50 mg/L		1	CCA Treated Wood
	pH (minimum)	7.05					
8.	pH (maximum)	8.43				-	

EPA Identification Number ALD067127225	NPDE	S Permit Number	Facility Nam Koppers In	e ic.	Outfall Number 005		Form Approved 03/05/1 OMB No. 2040-000
TABLE B. CERTAIN CONVENTION List each pollutant that is limited in an facility is operating under an existing	AL AND NO effluent lin NPDES per	ON CONVENTIONAL PC nitation guideline (ELG) ti rmit). Complete one table	DLLUTANTS (40 CFF nat the facility is subje for each outfall. See	t 122.26(c)(1)(i)(E)(4) and act to or any pollutant lister the instructions for additio	40 CFR 122.21(g)(7) d in the facility's NPDE mal details and require	(vi)(A))1 S permit for its process ements.	wastewater (if the
		Maximum Dail	y Discharge	Average Daily	/ Discharge	Number of Storm Events Sampled	Source of
Pollutant and CAS Number (if av	ailable)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		(new source/new dischargers only; use codes in instructions)
N/A							
					and a second		
			aar mareta a summa ar offering a subject of	-			

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

Page 9

EPA Identification Number ALD067127225	NPDES Permil Number AL0066184	Facility Nan Koppers Ir	ne nc.	Outfall Number 005		Form Approved 03/05/19 OMB No. 2040-0004
TABLE C. TOXIC POLLUTANTS, CERTA	IN HAZARDOUS SUBSTANC	ES, AND ASBESTO	S (40 CFR 122 26(c)(1)(i)	(E)(4) and 40 CFR 12	2.21(g)(7)(vi)(B) and (v	ii)) ¹
List each pollutant shown in Exhibits 2F-2, details and requirements.	2F-3, and 2F-4 that you know	w or have reason to b	elieve is present. Complet	e one table for each o	utfall. See the instruction	ns for additional
	Maximum Dal (specify	ly Discharge units)	Average Daily (specify	y Discharge units)	Number of Storm	Source of Information
Pollutant and CAS Number (If avaiable) Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
Arsenic	0.12 mg/L		0.03827 mg/L		11	A Treated Wood Stor
Chromium	0.42 mg/L		0.091 mg/L		11	A Treated Wood Stor
Copper	0.150 mg/L		0.045 mg/L		11	A Treated Wood Stor
Benzene	ND		ND		11	Penta Wood Treated
2, 4, 6 TCP.	ND		ND		11	Penta Wood Treated
4-Nitrophenol	ND		ND		11	Penta Wood Treated
Phenol	ND		ND		11	Penta Wood Treated
Pentachlorophenol	0.22 mg/L		0.06828 mg/L		11	Penta Wood Treated

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

Page 11

	EPA Identification Number NP ALD067127225	DES Permit Number AL0066184	Facility Nam Koppers In	e ic.	Outfall Number 006		Form Approved 03/05/19 OMB No. 2040-0004
TA	BLE A. CONVENTIONAL AND NON CON	VENTIONAL PARAMETER	RS (40 CFR 122.26(c)(1)(i)(E)(3)) ¹	See instructions for a	dditional details and requ	irements
TOU	Maximum Daily Discharge		Average Dail (specify	y Discharge units)		Source of	
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
1,	Oil and grease	ND		ND		1	Untreated Wood
2.	Biochemical oxygen demand (BOD5)	1.97 mg/L		1.97 mg/L		1	Untreated Wood
3.	Chemical oxygen demand (COD)	18 mg/L		18 mg/L		1	Untreated Wood
4.	Total suspended solids (TSS)	ND		ND		1	Untreated Wood
5.	Total phosphorus	ND		ND		1	Untreated Wood
6.	Total Kjeldahl nitrogen (TKN)	0.42		0.42		1	Untreated Wood
7.	Total nitrogen (as N)	0.42		0.42			Untreated Wood
0	pH (minimum)	7.89					
8.	pH (maximum)	7.89					

EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Facility Nam Koppers Ir	ne .	Outfall Number 006		Form Approved 03/05/19 OMB No. 2040-0004
TABLE B. CERTAIN CONVENTIONAL AN List each pollutant that is limited in an efflue facility is operating under an existing NPDE	D NON CONVENTIONAL PO nt limitation guideline (ELG) t S permit). Complete one table	DLLUTANTS (40 CFF hat the facility is subj e for each outfall. See	R 122.26(c)(1)(i)(E)(4) and ect to or any pollutant liste the instructions for addition	I 40 CFR 122.21(g)(7) d in the facility's NPDE onal details and require	(vi)(A)) ¹ ES permit for its process ements.	wastewater (if the
	Maximum Dai	ly Discharge	Average Daily	y Discharge		Source of
Pollutant and CAS Number (if available) Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	 Number of Storm Events Sampled 	(new source/new dischargers only; use codes in instructions)
N/A						

EPA Identification Number ALD067127225	EPA Identification Number NPDES Permit Number ALD067127225 AL0066184		Facility Name Koppers Inc.		Outfall Number 006		Form Approved 03/05/19 OMB No. 2040-0004	
TABLE C. TOXIC POLLUTANTS, CL List each pollutant shown in Exhibits details and requirements.	ERTAIN HA 2F-2, 2F-3	ZARDOUS SUBSTANC 9, and 2F-4 that you know	ES, AND ASBESTO v or have reason to b	S (40 CFR 122.26(c)(1)(i) elieve is present. Complete	(E)(4) and 40 CFR 12 e one table for each o	2.21(g)(7)(vi)(B) and (vi utfall. See the instruction	i)) ¹ s for additional	
A STATE OF A		Maximum Dail	y Discharge	Average Daily	/ Discharge		Source of	
Pollutant and CAS Number (if a	vailable)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	Information (new source/new dischargers only; use codes in instructions)	
Nitrogen			0.42		0.42	1	2	
Nitrogen, Kjeldahl			0.42		0.42	1	2	
Phosphorus			ND		ND	1	2	
Nitrogen, N2 plus NO3			ND		ND	1	2	
						-		

	EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Facility Nam Koppers In	ne nc.	Outfall Number 007		Form Approved 03/05/19 OMB No. 2040-0004
TA	BLE A. CONVENTIONAL AND NON CO	NVENTIONAL PARAMETER	RS (40 CFR 122.26(c	(1)(i)(E)(3)) ¹	Can instructions for a	ditional datails and race	iramente
100	must provide the results of at least one a	Maximum Daily Discharge		Average Dail (specify	Average Daily Discharge		Source of
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
1:	Oil and grease	ND		ND		1	Untreated Wood
2.	Biochemical oxygen demand (BOD5)	ND		ND		1	Untreated Wood
3.	Chemical oxygen demand (COD)	27 mg/L		27 mg/L		1	Untreated Wood
4.	Total suspended solids (TSS)	30 mg/L		30 mg/L		1	Untreated Wood
5.	Total phosphorus	0.11	-	0.11		1	Untreated Wood
6.	Total Kjeldahl nitrogen (TKN)	0.22		0.22		1	Untreated Wood
7.	Total nitrogen (as N)	0.23		0.23		1	Untreated Wood
	pH (minimum)	7.86			NE SE TRE		
8.	pH (maximum)	7.86					

EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Facility Nam Koppers Ir	ne nc.	Outfall Number 007]	Form Approved 03/05/19 OMB No. 2040-0004
TABLE B. CERTAIN CONVENTIONAL AI List each pollutant that is limited in an efflu facility is operating under an existing NPDE	ND NON CONVENTIONAL PO ent limitation guideline (ELG) t S permit). Complete one table	DLLUTANTS (40 CFF hat the facility is subject for each outfall. See	R 122.26(c)(1)(i)(E)(4) and ect to or any pollutant lister the instructions for addition	40 CFR 122.21(g)(7) d in the facility's NPDE onal details and require	(vi)(A)) ¹ S permit for its process ements.	wastewater (if the
	Maximum Dai	ly Discharge	Average Daily	y Discharge		Source of
Pollutant and CAS Number (if availab	(e) Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Number of Storm Events Sampled	(new source/new dischargers only; use codes in instructions)
N/A						

EPA Identification Number NPDES Permit Number ALD067127225 AL0066184		Facility Name Koppers Inc.		Outfall Number 007		Form Approved 03/05/19 OMB No. 2040-0004	
TABLE C. TOXIC POLLUTANTS, CE List each pollutant shown in Exhibits 2 details and requirements.	RTAIN HAZARDOUS SUBSTANC F-2, 2F-3, and 2F-4 that you know	ES, AND ASBESTO	S (40 CFR 122.26(c)(1)(i) elieve is present. Complete	(E)(4) and 40 CFR 12 e one table for each o	2.21(g)(7)(vi)(B) and (vi utfall. See the instruction	i)) ¹ s for additional	
	Maximum Dai	ly Discharge	Average Daily	/ Discharge		Source of	
Pollutant and CAS Number (if ava	uilable) Grab Sample Taken During First 30 Minutes	ple Taken Flow-Weighted First Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Number of Storm Events Sampled	(new source/new dischargers only; use codes in instructions)	
Nitrogen		0.29		0.29	1	2	
Nitrogen, Kjeldahl		0.27		0.27	1	2	
Phosphorus		0.13		0.13	1	2	
Nitrogen, NO2 plus NO3		ND		ND	1	2	

	EPA Identification Number NP ALD067127225	DES Permit Number AL0066184	Facility Nam Koppers In	le 1C.	Outfall Number 008		Form Approved 03/05/19 OMB No. 2040-0004
TAE	LE A. CONVENTIONAL AND NON CON must provide the results of at least one ar	VENTIONAL PARAMETEI alysis for every pollutant in	RS (40 CFR 122.26(c n this table. Complete)(1)(i)(E)(3)) ¹ one table for each outfall.	See instructions for a	dditional details and requ	lirements.
Sanday		Maximum Dail (specify	ly Discharge units)	Average Daily (specify	y Discharge units)	Number of Plane	Source of
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
1.	Oil and grease	0 mg/L		0 mg/L		1	Treated Wood
2.	Biochemical oxygen demand (BOD5)	2.42 mg/L		2.42 mg/L		1	Treated Wood
3.	Chemical oxygen demand (COD)	16 mg/L		16 mg/L		1	Treated Wood
4.	Total suspended solids (TSS)	0 mg/L		0 mg/L		1	Treated Wood
5.	Total phosphorus	ND		ND		1	Treated Wood
6.	Total Kjeldahl nitrogen (TKN)	0.17		0.17		1	Treated Wood
7.	Total nitrogen (as N)	ND		ND		1	Treated Wood
	pH (minimum)	7.85					
8.	pH (maximum)	7.85	n.				

EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Facility Nam Koppers Ir	ic.	Outfall Number 008		Form Approved 03/05/11 OMB No. 2040-000
TABLE B. CERTAIN CONVENTIONAL A	AND NON CONVENTIONAL PO	DLLUTANTS (40 CFF	R 122.26(c)(1)(i)(E)(4) and	40 CFR 122.21(g)(7) d in the facility's NPDE	(vi)(A)) ¹	wastewater (if the
facility is operating under an existing NPD	ES permit). Complete one table	o for each outfall. See	the instructions for additio	onal details and require	ements.	Source of
Pollutant and CAS Number (if availa	(specify ble) Grab Sample Taken During First 30 Minutes	units) Flow-Weighted Composite	(specify Grab Sample Taken During First 30 Minutes	Inits) Flow-Weighted Composite	Number of Storm Events Sampled	Information (new source/new dischargers only; use codes in instructions)
N/A						

EPA Identification Number ALD067127225	NPD	ES Permit Number AL0066184	Facility Nam Koppers In	e c.	Outfall Number 008	Form Approved 03/05/19 OMB No. 2040-0004	
TABLE C. TOXIC POLLUTANTS,	CERTAIN H	AZARDOUS SUBSTANC	ES, AND ASBESTO	S (40 CFR 122.26(c)(1)(i)	(E)(4) and 40 CFR 12	2.21(g)(7)(vi)(B) and (vi	i)) ¹
List each pollutant shown in Exhibit details and requirements.	s 2F-2, 2F-	3, and 2F-4 that you know	v or have reason to b	elieve is present. Complete	e one table for each o	utfall. See the instruction	s for additional
		Maximum Dail (specify	y Discharge units)	Average Daily (specify	/ Discharge units)	Number of Storm	Source of
Pollutant and CAS Number (#	f available)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
4-Nitrophenol		ND		ND		1	2
Pentachlorophenal		ND	ND	ND	ND	1	2
Phenol		ND	ND	ND	ND	1	2
2,4,6 - ТСР		ND	ND	ND	ND	1	2
Benzene		ND	ND	ND	ND	1	2
Arsenic		ND	ND	ND	ND	1	2
Chromium		ND	ND	ND	ND	1	2
Copper		ND	ND	ND	ND	1	2
	97-97-97-97-97-97-97-97-97-97-97-97-97-9						
· · · · · · · · · · · · · · · · · · ·							

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

Digitally signed by: AEPACS Date: 2024.11.11 07:11:52 -06:00 Reason: Submission Data Location: State of Alabama

version 2.10

(Submission #: HQ4-8RAZ-EV136, version 2)

Details

Submission ID HQ4-8RAZ-EV136

Form Input

General Instructions

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

Permit Transfers

•Permittee/Facility Name Changes

Minor Modifications, for example:

> Frequency of monitoring or reporting modifications

> Changes to interim compliance dates in a schedule of compliance, not including the final compliance date.

> Removal of a point source outfall, provided the discharge is terminated and does not result in discharge of pollutants from other outfalls, except in accordance with permit limits.

•Major Modifications, (Any modifications not covered by minor mod's, whether Effluent Limit changes occur or not) •Reissuances

·Reissuance of a permit due to approaching expiration

•Revocation and Reissuance of permit prior to its scheduled expiration

Applicable Base Fees:

•Permit Transfers and/or Permittee/Facility Name Changes

- >\$800
- •Minor Modifications (see examples above)
- > \$3,940 (Major Sources)
- >\$3,120 (Minor Sources)
- Major Modifications
- > \$17,990 (Major Sources)
- > \$5,615 (Minor Sources)
- Reissuances
- > \$17,990 (Major Sources)
- > \$5,615 (Minor Sources)

For assistance, please click here to determine the permit staff responsible for the site or call (334) 271-7799

Processing Information

Purpose of Application

Reissuance of Permit Due to Approaching Expiration

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

None

Action Type Reissuance

If applicable, briefly describe any planned changes at the facility that are included in this reissuance application: Replacement of previous wood preservative Pentachlorophenol with current wood preservative DCOI. Add additional site outfalls.

General Information

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

NPDES or General Permit Numbers (if applicable, please list all permit numbers): AL0066184

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

Is a new stormwater outfall being added? Yes

Permit Information

Permit Number AL0066184

Current Permittee Name

Brown Wood Preserving Co Inc

Permittee

Permittee Name Koppers Utility & Industrial Products

Mailing Address

16851 HIGHWAY 96

KENNEDY, AL 35574

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

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

Responsible Official

Prefix Mr. First Name Last Name Olson Corv Title Plant Manager **Organization Name** Koppers Utility & Industrial Products Phone Type Number Extension 2055340909 Business Email Olsoncj@koppers.com Mailing Address

16851 HIGHWAY 96

KENNEDY, AL 35574

Does the Responsible Official intend to delegate signatory authority for DMRs or other compliance reports to an individual as a duly authorized representative (DAR) for this site? No

Existing Permit Contacts

Affiliation Type	Contact Information	Remove?
Permittee	Brown Wood Preserving Co Inc	Remove
Responsible Official, Notification Recipient	David Stanley, David@bwpole.com	Remove
DMR Contact, Environmental Contact	Ed Thrasher, Brown Wood Preserving Co Inc	Remove

Facility/Site Information

Facility/Site Name

Koppers Utility and Industrial Products Inc. Kennedy Plant

Organization/Ownership Type

Corporation

Facility/Site Address or Location Description

16851 HIGHWAY 96 KENNEDY, AL 35574

Facility/Site County

Lamar

Detailed Directions to the Facility/Site

.5 mi. east of intersection of AL Hwy 17 and AL Hwy 96

Facility Map

KOP-KEN SITE MAP 36X48.pdf - 07/02/2024 12:14 PM Comment NONE PROVIDED

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

Facility/Site Front Gate Latitude and Longitude 33,5780000000000,-87,99979999999999

15851 Hwy 96 W, Kennedy, AL

SIC Code(s) [Please enter Primary SIC Code first followed by any additional applicable SIC Codes] 2491-Wood Preserving

NAICS Code(s) [Please enter Primary NAICS Code first followed by any additional applicable NAICS Codes] 321114-Wood Preservation

Facility/Site Contact

Prefix Mr. First Name Last Name Cory Olson Title Plant Manager **Organization Name** Koppers Utility & Industrial Products Phone Type Number Extension Mobile 2055340909 Email olsoncj@koppers.com Address 16851 HIGHWAY 96 KENNEDY, AL 35574

DMR Contact(s) (1 of 2)

DMR Contact

 Prefix
 Last Name

 First Name
 Last Name

 Cory
 Olson

 Title
 NONE PROVIDED

 Phone Type
 Number
 Extension

 Mobile
 2055340909

 Email
 olsoncj@koppers.com

Address 16851 HIGHWAY 96 KENNEDY, AL 35574

DMR Contact(s) (2 of 2)

DMR Contact

Prefix
Mr.Last Name
WisemanFirst Name
KevinLast Name
WisemanTitle
Zero Harm Business Unit Partner, UIPPhone TypeNumberMobile9318023678Email
wisemankw@kerpers.comAddress

436 7TH AVE PITTSBURGH, PA 15219

Applicant Business Entity Information

Address of Incorporation

436 Seventh Avenue Pittsburgh, PA 15219

Agent Designated by the Corporation for Purposes of Service

Name	Address		
Kevin Wayne Wiseman	436 Seventh Avenue Pittsburgh, PA 15219		

Please provide all corporate officers

Name	Title	Address
Kevin Wayne Wiseman	Zero Harm Partner, UIP	436 Seventh Avenue Pittsburgh, PA 15219

Does the applicant applying for coverage have a Parent Corporation? Yes

Parent Corporation of Applicant

Name	Address
Koppers Inc.	436 Seventh Avenue Pittsburgh, PA 15219

Does the applicant applying for coverage have Subsidiary Corporations? No

Enforcement History

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

Business Activity

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

Industrial Section Assignment Map

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

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

Operations at the facility include wood pole drying, framing and pressure treatment activities. Pressure treatment is performed utilizing the inorganic preservative Chromated Copper Arsenate (CCA) and DCOI. DCOI is not a listed toxic or hazardous air pollutant. The products produced are pressure treated utility poles for the utility industry.

Outfalls (1 of 6)

001

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall

Provide the reason this outfall is being deleted.

Entered in Error

Outfall Identifier

001

Indicate if either of the following characteristics apply to this discharge: None apply

Estimated Average Daily Flow (MGD) 0

Outfalls (2 of 6)

003

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall

Provide the reason this outfall is being deleted. Entered in Error

Outfall Identifier 003

Indicate if either of the following characteristics apply to this discharge: None apply

Estimated Average Daily Flow (MGD) 0

Outfalls (3 of 6)

005

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall

Provide the reason this outfall is being deleted. Entered in Error

Outfall Identifier 005

Indicate if either of the following characteristics apply to this discharge: None apply

Estimated Average Daily Flow (MGD) 0

Outfalls (4 of 6)

006

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall
Provide the reason this outfall is being deleted. Entered in Error

Outfall Identifier
006

Indicate if either of the following characteristics apply to this discharge: None apply

Estimated Average Daily Flow (MGD) 0

Outfalls (5 of 6)

007

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall

Provide the reason this outfall is being deleted. Entered in Error

Outfall Identifier
007

Indicate if either of the following characteristics apply to this discharge: None apply

Estimated Average Daily Flow (MGD) 0

Outfalls (6 of 6)

008

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall

Provide the reason this outfall is being deleted. Entered in Error

Outfall Identifier

Indicate if either of the following characteristics apply to this discharge: None apply

Estimated Average Daily Flow (MGD) 0

Stormwater Outfalls (1 of 9)

SW01

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

Outfall Identifier SW01

Receiving Water Luxapallila Creek

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

Indicate if either of the following characteristics apply to this discharge: Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location

33.578694559177514,-87.9984977698889

Stormwater Outfalls (2 of 9)

SW02

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

Outfall Identifier SW02

Receiving Water Luxapallila Creek

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

Indicate if either of the following characteristics apply to this discharge: Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location 33.580692823629526,-88.00007859600511

Stormwater Outfalls (3 of 9)

SW03

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

Outfall Identifier SW03

Receiving Water Luxapallila Creek

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

Indicate if either of the following characteristics apply to this discharge: Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location 33.579647288752,-88.00309012118612

Stormwater Outfalls (4 of 9)

SW04

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall

Provide the reason this outfall is being deleted. Outfall Location No Longer Exists

Outfall Identifier

SW04

Stormwater Outfalls (5 of 9)

SW05

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

Outfall Identifier SW05

Receiving Water Luxapallila Creek

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

Indicate if either of the following characteristics apply to this discharge: Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location

33.5786213569729,-88.00576082486485

Stormwater Outfalls (6 of 9)

SW06

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

Outfall Identifier SW06

Receiving Water Luxapallila Creek

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

Indicate if either of the following characteristics apply to this discharge: Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location 33.58073791265768,-87.99968190670474

Stormwater Outfalls (7 of 9)

SW07

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

Outfall Identifier SW07

Receiving Water Luxapallila Creek

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

Indicate if either of the following characteristics apply to this discharge: Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location 33.583355619646106,-88.00079835768001

Stormwater Outfalls (8 of 9)

SW08

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

Outfall Identifier SW08

Receiving Water Luxapallila Creek

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

Indicate if either of the following characteristics apply to this discharge: Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location 33.583117119378976,-88.00103108468174

Stormwater Outfalls (9 of 9)

SW 09

Please click below if this discharge no longer exists or is no longer required: Delete this Outfall

Provide the reason this outfall is being deleted. Entered in Error

Outfall Identifier SW09

Anti-Degradation Evaluation

Is this a new or increased discharge that began after April 3, 1991? Yes Has an Anti-Degradation Analysis been previously conducted and submitted to the Department for the new or increased discharge referenced above?

No

NOTE

If the discharge is to a Tier II waterbody as defined in ADEM Admin. Code r. 335-6-10-.12(4), complete questions below, ADEM Form 311-Alternatives Analysis, and either ADEM Form 312 or ADEM Form 313- Calculation of Total Annualized Project Costs (Public-Sector or Private-Sector Projects, whichever is applicable). ADEM Form 312 or ADEM Form 313, whichever is applicable, must be provided for each treatment discharge alternative considered technically viable. <u>ADEM forms can be found on the Department s website here.</u>

What environmental or public health problem will the discharger be correcting? Better identification of possible problems or contaminants that may arise.

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

N/A

How much reduction in employment will the discharger be avoiding? $\ensuremath{\mathsf{N/A}}$

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

To be determined. Maintaining more product inventory will allow the facility to take advantage of high demand periods, increasing annual sales, and thus increasing state or local taxes paid.

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

More readily available inventory will allow us to service storm events in a more timely and expeditious manner.

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

More readily available inventory will allow us to service storm events in a more timely and expeditious manner.

Attach Form 311, Form 312, or Form 313

Electronic Copy of Antidegradation Analysis with Form 311 Signed.pdf - 11/06/2024 10:03 AM Comment NONE PROVIDED

Additional Information

Do you share an outfall with another facility? No

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

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

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

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

Please attach the process schematic with sampling equipment locations.

Water Flow Schematic.pdf - 07/02/2024 01:28 PM

Comment

NONE PROVIDED

Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics (Consider production processes as well as air or water pollution treatment processes that may affect the discharge.)? No Do you use biocides, corrosion inhibitors, or chemical additives in your cooling or blowdown water? No

Biocide/Corrosion Inhibitor Summary Sheet

<u>SDS Feedwater 4.pdf - 07/02/2024 08:25 AM</u> <u>SDS Steam 150.pdf - 07/02/2024 08:25 AM</u> <u>SDS BLR 10.pdf - 07/02/2024 08:25 AM</u> <u>AL Boiler 2023.docx - 07/02/2024 08:26 AM</u> <u>Comment</u> NONE PROVIDED

Treatment

Is any form of wastewater treatment (see list below) practiced at this facility? No

Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the next three years? No

Facility Operational Characteristics

Indicate whether the facility discharge is: Continuous through the year

Comments: NONE PROVIDED

Non-Discharged Wastes

Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system? $\ensuremath{\mathsf{No}}$

Does any outside firm remove any of the above checked wastes? $\ensuremath{\mathsf{No}}$

EPA Application Forms

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

Form 1 - General Information Form required for all applications

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

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

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

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

EPA Form 1

EPA Form 1 Signed Kennedy July 1 2024.pdf - 07/02/2024 02:39 PM Comment NONE PROVIDED

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

EPA Form 2F NPDES Signed Kennedy 7-2-24.pdf - 07/02/2024 02:40 PM Comment NONE PROVIDED

Other attachments (as needed)

KOP-KEN SITE MAP 36X48.pdf - 07/02/2024 12:19 PM KOP-KEN Site Topo Map 2024.pdf - 07/02/2024 12:36 PM Comment NONE PROVIDED

Additional Attachments

Please attach any additional information as needed.

Comment NONE PROVIDED

Application Preparer

Application Preparer

Prefix NONE PROVIDED First Name Last Name Kevin Wiseman Title Zero Harm Business Unit Partner, UIP **Organization Name** Koppers Phone Type Number Extension Mobile 9318023678 Email wisemankw@koppers.com Address

436 Seventh Avenue Pittsburgh, PA 15219

Revisions

Revision	Revision Date	Revision By		
Revision 1	6/9/2024 3:28 PM	Randy McGough		
Revision 2	10/10/2024 12:55 PM	Kevin Wiseman		

SUBMISSION AGREEMENTS

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

"I certify under penalty of 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 property gather and evaluate the information submitted; based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

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

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

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

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



Cory Olson on 11/11/2024 at 7:04 AM

EP	A Identifica ALD057:	tion Number 127225	NPDES Permit Nu ALOO66184	imber I	Fa	ppers Inc.	Form Approved 03/05/ OMB No. 2040-00	
Form 1 PDES	Ş	EPA	U.S. Environmental Protection Agency Application for NPDES Permit to Discharge Wastewater GENERAL INFORMATION					
ECTIO	N 1. AC	TIVITIES REQUIRIN	G AN NPDES PER	MIT (40 CFR	122.21(f) ar	nd (f)(1))		
	1.1	Applicants Not R	equired to Submit	Form 1				
	1.1.1	Is the facility a new treatment works? If yes, STOP. Do N Form 1. Complete	v or existing public VOT complete Form 2A.	ly owned	1.1.2	Is the facility a treating dome If yes, STOP. I complete Form Form 2S.	new or existing treatment works ostic sewage? Do NOT I No n 1. Complete	
	1.2	Applicants Requi	ired to Submit For	m 1				
PDES Permit	1.2.1	Is the facility a cor operation or a co production facilit ☐ Yes → Con and	ncentrated animal ncentrated aquation y? mplete Form 1 of Form 2B.	feeding canimal	1.2.2	Is the facility ar commercial, mi currently disc Yes	existing manufacturing, ining, or silvicultural facility that is harging process wastewater? Complete Form 2 No and Form 2 C.	
Requiring an NF	1.2.3	Is the facility a new mining, or silvicultu commenced to di ☐ Yes → Con and	v manufacturing, co ural facility that has ischarge? nplete Form 1 I Form 2D.	ommercial, s not yet	1.2.4	Is the facility a commercial, mi discharges on □ Yes →	new or existing manufacturing, hing, or silvicultural facility that ily nonprocess wastewater? Complete Form I No 1 and Form 2E.	
Activitie	1.2.5	Is the facility a new discharge is comp associated with in discharge is comp non-stormwater? ✓ Yes → Com and 400 122 (b)	v or existing facilit osed entirely of sto ndustrial activity of osed of both storm nplete Form 1 f Form 2F ess exempted by CFR 2.26(b)(14)(x) or 15)	ty whose rmwater or whose nwater and				
ECTIO	NO NA		ID.	ION IAD CEP	122 24/11/2	N. T. C. S. C.		
.0110	2.1	Facility Name	LOO, AND LOOAT	ION 140 OF IC		11 12 14 14 15 15 15 15 15 15 15 15 15 15 15 15 15		
		Koppers Utility and Industrial Products Inc. Kennedu Plant						
-	22	EDA Identification	Mumbar					
ocatic	2.2	EPA Identification Number						
J Pi		ALDOG/12/223		Williand of a little decourses				
8, B)	2.3	Facility Contact		-				
Vddres		Name (first and las Cory Olson	st)	Title Plant Manager			Phone number (205) 534-0909	
, Builia		Email address olsoncj@koppers.c	om					
e, M	2.4	Facility Mailing A	ddress		1020000	¥		
Nam		Street or P.O. box 16851 Highway 96					•••• * ######	
1.4		City or town		State			7IP mde	

	1	127225	AL0066184	Koppers Inc.	UMB NO. 2040-01			
ued ued	2.5	Facility Location	, ä					
Contin		Street, route number, or o 16851 Highway 96	ther specific identifier					
cation		County name Lamar	County code (if	known)				
name, and Lo		City or town Kennedy	State AL		ZIP code 35574			
ECTIO	N 3. SIC	AND NAICS CODES (40 C	FR 122.21(f)(3))					
	3.1	SIC Code(s) Description (optional)						
		2491	Wood Preserving	š				
19								
ICS Cod					an a			
N	3.2	NAICS Code(s) Description (optional)						
SIC and		321114	21114 Wood Preserving					
ECTIO	N 4. OP	ERATOR INFORMATION (4	0 CFR 122.21(f)(4))					
ECTIO	N 4. OP 4.1	ERATOR INFORMATION (4	0 CFR 122.21(f)(4))					
ECTIO	N 4. OP 4.1	ERATOR INFORMATION (4 Name of Operator Koppers Utility and industr	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy	y Plant				
ECTIO	N 4. OP 4.1 4.2	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy iem 4.1 also the owner?	y Plant				
ormation OIL23	N 4. OP 4.1 4.2	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes I No	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy em 4.1 also the owner?	y Plant				
or Information	N 4. OP 4.1 4.2 4.3	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes I No Operator Status	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy tem 4.1 also the owner?	y Plant	8			
Operator information	N 4. OP 4.1 4.2 4.3	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes INO Operator Status Public—federat I Private	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy tem 4.1 also the owner?	y Plant	er public (specify)			
Operator information	N 4. OP 4.1 4.2 4.3 4.4	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes INO Operator Status Public—federat I Private Phone Number of Opera	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy tem 4.1 also the owner?	y Plant	s er public (specify)			
Operator Information	N 4. OP 4.1 4.2 4.3 4.4	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes INO Operator Status Deviator Status Public—federat Private Phone Number of Operat (205) 534-0909	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy rem 4.1 also the owner?	y Plant	er public (specify)			
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Operator information	N 4. OP 4.1 4.2 4.3 4.4 4.5	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes INO Operator Status Public—federal Private Phone Number of Operat (205) 534-0909 Operator Address Street or P.O. Box 16851 Highway 95	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy tem 4.1 also the owner?	y Plant	er public (specify)			
Infinued Operator Information	N 4. OP 4.1 4.2 4.3 4.4 4.5	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes INO Operator Status Public—federat I Private Phone Number of Operat (205) 534-0909 Operator Address Street or P.O. Box 16851 Highway 95 City or town	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy iem 4.1 also the owner?	/ Plant	er public (specify)			
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nd Old Sontinued Operator information	N 4. OP 4.1 4.2 4.3 4.4 4.5 N.5. IND 5.1	ERATOR INFORMATION (4 Name of Operator Koppers Utility and Industr Is the name you listed in It Yes INO Operator Status Public—federat I Public—federat Private Phone Number of Operat (205) 534-0909 Operator Address Street or P.O. Box 16851 Highway 95 City or town Kennedy Email address of operator olsoncj@koppers.com	0 CFR 122.21(f)(4)) ial Products Inc, Kennedy, iem 4.1 also the owner? Public—state Other (specify) tor State AL f)(5)) dian Land?	y Plant	er public (specify)			

LF	ALD067	127225 ALOC	Permit Number 066184	Koppers Inc.	OMB No. 2040-0
ECTIO	N 6. EXI	STING ENVIRONMENTAL PER	MITS (40 CFR 122.	21(f)(6))	
	6.1	Existing Environmental Pern	nits (check all that a	apply and print or type the co	prresponding permit number for each
Ita		NPDES (discharges to sur water)	face 🛛 RCRA ('hazardous wastes)	UIC (underground injection of fluids)
Perm		PSD (air emissions)	Nonatta	inment program (CAA)	NESHAPs (CAA)
		Ocean dumping (MPRSA)	Dredge	or fill (CWA Section 404)	Other (specify)
ECTIO	N 7. MA	P (40 CFR 122.21(f)(7))			
Map	7.1	Have you attached a topograph specific requirements.)	hic map containing : D—Not Applicable (:	all required information to th See requirements in Form 2	is application? (See instructions for B.)
ECTIO	N 8. NA	TURE OF BUSINESS (40 CFR 1	22.21(f)(8))		
		Receive peeled poles in we dry	the poles and treat	them.	
Nature of Business					
Nature of Business	N 9. CO 9.1	OLING WATER INTAKE STRUC	TURES (40 CFR 1)	22.21(f)(9))	
Nature of Business	N 9. CO 9.1	OLING WATER INTAKE STRUC Does your facility use cooling v	TURES (40 CFR 1) vater?	22.21(f)(9))	
vooling water A Nature of Business Intake Structures	N 9. CO 9.1 9.2	OLING WATER INTAKE STRUC Does your facility use cooling v ☐ Yes ☑ No → SKIP to Identify the source of cooling w 40 CFR 125, Subparts I and J I NPDES permitting authority to	TURES (40 CFR 1) vater? htem 10.1. rater. (Note that faci may have additional determine what spe	22.21(f)(9)) lities that use a cooling wate l application requirements a scific information needs to be	er intake structure as described at t 40 CFR 122.21(r). Consult with you e submitted and when.)
Definition of Business Definition of Business	N 9. CO 9.1 9.2 N 10. V/	OLING WATER INTAKE STRUC Does your facility use cooling v ☐ Yes ☑ No → SKIP to Identify the source of cooling w 40 CFR 125, Subparts I and J NPDES permitting authority to ARIANCE REQUESTS (40 CFR 1	TURES (40 CFR 1) vater? htem 10.1. rater. (Note that faci may have additional determine what spe 122.21(f)(10))	22.21(f)(9)) lities that use a cooling wate application requirements a scific information needs to be	er intake structure as described at t 40 CFR 122.21(r). Consult with you e submitted and when.)
ests T Cooling Water T Nature of Business	N 9. CO 9.1 9.2 N 10. V/ 10.1	OLING WATER INTAKE STRUC Does your facility use cooling v Yes ✓ No → SKIP to Identify the source of cooling w 40 CFR 125, Subparts I and J NPDES permitting authority to RIANCE REQUESTS (40 CFR 1 Do you intend to request or ren apply. Consult with your NPDE when.)	TURES (40 CFR 1) vater? htem 10.1. rater. (Note that faci may have additional determine what spe 122.21(f)(10)) new one or more of f S permitting author	22.21(f)(9)) lities that use a cooling wate l application requirements a scific information needs to be the variances authorized at ity to determine what inform	er intake structure as described at t 40 CFR 122.21(r). Consult with you e submitted and when.) 40 CFR 122.21(m)? (Check all that ation needs to be submitted and
e Requests A Cooling Water A Nature of Business	N 9. CO 9.1 9.2 N 10. V/ 10.1	OLING WATER INTAKE STRUC Does your facility use cooling v ☐ Yes ☑ No → SKIP to Identify the source of cooling w 40 CFR 125, Subparts I and J I NPDES permitting authority to a ARIANCE REQUESTS (40 CFR 1 Do you intend to request or ren apply. Consult with your NPDE when.) ☐ Fundamentally different Section 301(n))	TURES (40 CFR 1) vater? 1 Item 10.1. rater. (Note that faci- may have additional determine what spe 122.21(f)(10)) rew one or more of f S permitting authori factors (CWA	22.21(f)(9)) lities that use a cooling wate l application requirements a cific information needs to be the variances authorized at a ity to determine what inform U Water quality related 302(b)(2))	er intake structure as described at t 40 CFR 122.21(r). Consult with you e submitted and when.) 40 CFR 122.21(m)? (Check all that ation needs to be submitted and t effluent limitations (CWA Section
Variance Requests Cooling water Cooling wate	N 9. CO 9.1 9.2 N 10. V/ 10.1	OLING WATER INTAKE STRUC Does your facility use cooling v I Yes No → SKIP to Identify the source of cooling w 40 CFR 125, Subparts 1 and J in NPDES permitting authority to RIANCE REQUESTS (40 CFR 4 Do you intend to request or remapply. Consult with your NPDE when.) □ Fundamentally different Section 301(n)) □ Non-conventional polluta Section 301(c) and (g))	TURES (40 CFR 1) vater? a ttem 10.1. rater. (Note that faci may have additional determine what spe 122.21(f)(10)) rew one or more of f S permitting authori factors (CWA ants (CWA	22.21(f)(9)) lities that use a cooling wate l application requirements a writic information needs to be the variances authorized at a ity to determine what informa- Water quality related 302(b)(2)) Thermal discharges	er intake structure as described at t 40 CFR 122.21(r). Consult with you e submitted and when.) 40 CFR 122.21(m)? (Check all that ation needs to be submitted and d effluent limitations (CWA Section (CWA Section 316(a))

EPA Identification Number ALD067127225		ition Numb	er NPDES Permit Number AL0066184	Facility Name Koppers Inc.	Form Approved 03/05/ OMB No. 2040-00		
CTIO	N 11. CH	HECKLI	ST AND CERTIFICATION STATEMENT (40 CFR 12	22.22(a) and (d))			
	11.1	In Col For ea that no	umn 1 below, mark the sections of Form 1 that you t ich section, specify in Column 2 any attachments tha of all applicants are required to provide attachments.	have completed and are submitting with your application at you are enclosing to alert the permitting authority. No s.			
		L	Column 1	Colu	mn 2		
			Section 1: Activities Requiring an NPDES Permit	w/ attachments			
			Section 2: Name, Mailing Address, and Location	w/ attachments			
			Section 3: SIC Codes	w/ attachments			
			Section 4: Operator Information	w/ attachments			
			Section 5: Indian Land	w/ attachments			
ŭ		Ø	Section 6: Existing Environmental Permits	w/ attachments			
ateme		Ø	Section 7: Map	w/ topographic map	w/ additional attachments		
			Section 8: Nature of Business	w/ attachments			
tiricat			Section 9: Cooling Water Intake Structures	w/ attachments			
			Section 10: Variance Requests	w/ attachments	- M 1947-2 M - 1988-1991 - 1 - 1 - 1 - 1		
JE 16			Section 11: Checklist and Certification Statement	w/ attachments	······		
2010	11.2	Certifi I certifi in accu inform directi belief, includi	cation Statement y under penalty of law that this document and all atta- ordance with a system designed to assure that quali- ation submitted. Based on my inquiny of the person of y responsible for gathering the information, the infor- true, accurate, and complete. I am aware that there ing the possibility of fine and imprisonment for knowing the possibility of the possibility of	achments were prepared under fied personnel properly gather or persons who manage the sy nation submitted is, to the best are significant penalties for sur ng violations.	r my direction or supervisio and evaluate the stem, or those persons of my knowledge and bmitting false information,		
		Name Kevin V	(print or type first and last name) Viseman	Official title Zero Harm Business Unit Partner, UIP			
		Signal	une win Wiseman	Date signed July 1, 202	4		

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EPA II	LDO6712	n Number 7225	NPDES Permit AL00661	Number 84		Facility Na Koppers	inc.		F	orm Approv OMB No	ved 03/05/ . 2040-000
Form 2F IPDES	S	EPA	STORMW	U.S Application ATER DISCH	S Environm for NPDES	ental Pro Permit to SSOCIA	tection Age Discharge TED WITH	Wastew	rater RIAL A	CTIVITY	,
ECTION	1. OUT	FALL LOCA	TION (40 CFR 122.21)	(g)(1))	120024		The states	San Ye	常語言	1. 19	1
	1.1	Provide info	ormation on each of th	e facility's outfa	Is in the tab	le below			<u> </u>	S 1.37	12 Y 1 Y 1 Y 1 Y 1
		Outfall Number	Receiving Water N	ame	Lati	tude			Longitude		
u		001	Unnamed Tributar	y to 33.0	of 34.00	43.00"	N	87.00°	59.00'	54.00"	w
cati		002	Unnamed Tributar	to 33.0	o [°] 34.00	50.00	N	87.00°	59.00 [']	59.00"	W
tfail Lo		003	Unnamed Tributan	to 33.0	o ^o 34.00	46.00"	N	88.00°	0.00	11.00"	w
Out		005	Unnamed Tributan	y to 33.0	0° 34.00′	43.00	N	88.00	0.00′	20.00"	W
		006	Unnamed Tributan	to 33.0	0° 34.00′	50.00"	N	87.00°	59.00'	58.00"	W
		007	Unnamed Tributar	to 33.0	0° 34.00'	59.00"	N	88.00°	0.00'	02.00"	W
ECTION	12. IMP	ROVEMENTS	(40 CFR 122.21(g)(6))	C. Lange Start	Sec. 1	100	4.46.8			1. A. C.
	2.2	Priefly iden	tify each applicable pro	oject in the table	e below.		No → SKIP	to Secto	r 3.		
		Brief Identification and Affe		Affected Ou	ected Outfalls			Final Compliance Dates			
		Desc	ription of Project	(list outfall nur	mbers)	GOURA	e(s) or Disca	ağı	Req	sired	Projecter
Improvements											

EPA I Al	dentification	Number 7225	NPDES Permit N AL006618	lumber 34			Facility Nan Koppers Ir	ne nc.		Form O	Approved (MB No. 20)3/05/19 40-0004
Form 2F	Ŷ	EPA		Applica	U.S Env ation for I	/ironme NPDES	ntal Prote Permit to	ection Age Discharge	ency Wastewa	ater		
RPUES			STORMW	ATER DI	SCHAR	SES AS	SOCIAT	ed with	INDUST	RIAL ACTI	VITY	
SECTIO	1 1. OUT	FALL LOCA	TION (40 CFR 122.21(g	g)(1)) fooilith/o	outfalls in	the tabl	o bolow					
	1.1	Outfall	onnation on each of the	Hacility S	ouuans m	the tabl	e Deiow	T				
		Number	Receiving water Na	ime		Latit	ude			Longitur	1e	
E		008	Unnamed Tributary	to	33.00	34.00	59.00″	N	88.00°	00.00' 0	3.00 [∞] V	v
ocatic					Ċ,	ı	19		ĉ	,	2	
fall Lo					D	2	2		ě	!		
out					9	,	u		5	,	ø	
					D	,	n		a		Ð	
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SECTIO	N 2. IMPR	ROVEMENTS	(40 CFR 122.21(g)(6))			1						
	2.2	upgrading, affect the d Priefly iden	or operating wastewate ischarges described in t tify each applicable proj	r treatme this applic ject in the	ent equipm cation?	ent or p	ractices of	ranyother Io → SKI	environm P to Sectio	n 3.	ms that c	bluc
		Brief Identification and Affected Outfalls					Final Compliance			Dates		
		Desc	Description of Project (list			outfall numbers)			large	Require	d Pro	jected
											و میدور است. میلاند و میانید دیلار است.	
ements												
Improv												
												·····.
	23	Have you a	Itached sheats describi		ditional	pter pol	lution cont		me for othe			octr
	2.5	that may af	fect your discharges) th	at you no	w have un	Iderway	or planne	d? (Option	al Item)		inter proj	us
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	LD06712	7225	ALOO66184	Facility Koppe	Name Form Approved ers Inc. OMB No. 2	
ECTIO	N 3. SITE	DRAINAGE	AP (40 CFR 122.26(c)(1)(i)(A	0		
Drainage Map	3.1	Have you att specific guid	ached a site drainage map cor ance.)	ntaining all required inform	nation to this application? (See instruc	tions for
ECTIO	N 4. POL	LUTANT SOU	RCES (40 CFR 122.26(c)(1)(i)	(B))		
	4.1	Provide infor	mation on the facility's pollutar	nt sources in the table be	low.	
		Outfall Number	Impervious Surfa (within a mile radius of	ce Area the facility)	Total Surface Area Drained (within a mile radius of the facility)	
		001	0.40	specily units acres	6.91	specify unit
		002	0.15	specify units acres	6.53	specify unit acres
		003	0.85	specify units acres	16.78	specify unit acres
		005	0.12	specify units acres	12.28	specify units acres
		006	0.15	specify units acres	3.32	specify units acres
		007	0.13	specify units	5.35	specify unit
40		The facility dried inside	8.) stores green wood poles and f e the dry kilos. All pressure tre	inished treated poles on atment occurs inside the	above ground pole runners. All the gro treatment cylinders inside the treating	een wood is g buildings.
Pollutant Sources	4.3	Provide the	8.) stores green wood poles and f e the dry kilns. All pressure tre un cycles are applied after pre oval from the cylinders, the tre rewards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer	inished treated poles on atment occurs inside the ssure treatment inside th eated wood remains on c removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemic disting structural and non- wife nuidance.	above ground pole runners. All the gro treatment cylinders inside the treating the cylinders to remvoe any excess press overed concrete drip pad until any drip storage areas. A BMP Plan and a SPCC rtilizers are directly applied to the faci unloaded on concrete containment pic cal storage tanks.	een wood is g buildings. eervattives. ppage has Plan are in lity propert ads and pollutants in
Pollutant Sources	4.3	Provide the stormwater	8.) stores green wood poles and f e the dry kilns. All pressure tre um cycles are applied after pre oval from the cylinders, the tre erwards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer	inished treated poles on atment occurs inside the ssure treatment inside th eated wood remains on c removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemic disting structural and non- ecific guidance.)	above ground pole runners. All the gro treatment cylinders inside the treating the cylinders to remvoe any excess press overed concrete drip pad until any drip storage areas. A BMP Plan and a SPCC rtilizers are directly applied to the faci unloaded on concrete containment pic cal storage tanks.	een wood is g buildings. eervattives. ppage has Plan are in lity propert ads and pollutants in
Pollutant Sources	4.3	Provide the stormwater in Number	8.) stores green wood poles and f e the dry kins. All pressure tre um cycles are applied after pre oval from the cylinders, the tre terwards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer location and a description of ex unoff. (See instructions for spe	inished treated poles on atment occurs inside the ssure treatment inside th eated wood remains on c removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemic disting structural and non- ecific guidance.) Stormmater Treatme Control Measures and T	above ground pole runners. All the gro treatment cylinders inside the treating the cylinders to remvoe any excess press overed concrete drip pad until any drij storage areas. A BMP Plan and a SPCC rtifizers are directly applied to the faci unloaded on concrete containment pictal storage tanks.	een wood is g buildings. eervattives. ppage has Plan are in lity propert ads and pollutants ir Codes from Exhibit 2F-1 (ist)
Pollutant Sources	4.3	Provide the stormwater i	8.) stores green wood poles and f a the dry kins. All pressure tre im cycles are applied after pre oval from the cylinders, the tre rewards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer location and a description of ep unoff. (See instructions for spe Gravel filtration bed and rip	inished treated poles on atment occurs inside the ssure treatment inside the sated wood remains on o removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemic disting structural and non- ecific guidance.) Stormmeter Treatment Control Measures and T	above ground pole runners. All the gro treatment cylinders inside the treating the cylinders to remvoe any excess press overed concrete drip pad until any drip storage areas. A BMP Plan and a SPCC rtilizers are directly applied to the faci unloaded on concrete containment pa cal storage tanks. structural control measures to reduce ent	een wood is g buildings. eervattives. ppage has Plan are in lity propert ads and pollutants in Exhibit 2F-1 (ist) 1-Q, 1-U
Pollutant Sources	4.3	requirement The facility dried inside Long vacue After rem ceased. Aft place at the All cher Provide the stormwater i Outfall Number 001	8.) stores green wood poles and f a the dry kins. All pressure tre um cycles are applied after pre oval from the cylinders, the tre rewards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer location and a description of ex- unoff. (See instructions for spe Gravel filtration bed and rip Shallow ditch with vegetation	inished treated poles on atment occurs inside the ssure treatment inside the sated wood remains on o removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemic disting structural and non- ecific guidance.) Stormmater Treatment Control Measures and T rap at outfall en cover and rip rap at ou	above ground pole runners. All the gro treatment cylinders inside the treating recylinders to remvoe any excess press overed concrete drip pad until any drij storage areas. A BMP Plan and a SPCC rtilizers are directly applied to the faci unloaded on concrete containment pa cal storage tanks. structural control measures to reduce ent	een wood is g buildings. eervattives. ppage has Plan are in lity propert ads and pollutants in Exhibit 2F-1 (ist) 1-Q, 1-U 1-Q, 1-U
Pollutant Sources	4.3	requirement The facility dried inside Long vacue After rem ceased. Aft place at the i All cher Provide the stormwater i Outfail Number 001 002 003	8.) stores green wood poles and f e the dry kins. All pressure tre im cycles are applied after pre oval from the cylinders, the tre serwards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer location and a description of ep unoff. (See instructions for spe Gravel filtration bed and rip Shallow ditch with vegetatio Hale bale protected grated i	inished treated poles on atment occurs inside the ssure treatment inside the sated wood remains on o removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemid disting structural and non- ecific guidance.) Stormmater Treatment Control Measures and T rap at outfall on cover and rip rap at ou inlet to drainage pipes, rip	above ground pole runners. All the gro treatment cylinders inside the treating re cylinders to remvoe any excess press overed concrete drip pad until any drij storage areas. A BMP Plan and a SPCC rtilizers are directly applied to the faci unloaded on concrete containment pa cal storage tanks. structural control measures to reduce ent freatment tfall p rap and vegetation cover at outfall	een wood is g buildings. eervattives. ppage has Plan are in lity propert ads and pollutants in Codes from Exhibit 2F-1 (ist) 1-Q, 1-U 1-Q, 1-U
Pollutant Sources	4.3	requirement The facility dried inside Long vacue After rem ceased. Aft place at the All cher Provide the stormwater i Outfail Number 001 002 003 005	8.) stores green wood poles and f e the dry kins. All pressure tre um cycles are applied after pre oval from the cylinders, the tre serwards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer location and a description of ep unoff. (See instructions for spe Gravel filtration bed and rip Shallow ditch with vegetatio Hale bale protected grated i Rip rap, sedimentation trap:	inished treated poles on atment occurs inside the ssure treatment inside the sated wood remains on o removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemic disting structural and non- ecific guidance.) Stormmater Treatment Control Measures and T rap at outfall on cover and rip rap at ou inlet to drainage pipes, rip s and gravel filtration at o	above ground pole runners. All the gro treatment cylinders inside the treating re cylinders to remvoe any excess press overed concrete drip pad until any drij storage areas. A BMP Plan and a SPCC rtilizers are directly applied to the faci unloaded on concrete containment pa- cal storage tanks. structural control measures to reduce ent freatment tfall p rap and vegetation cover at outfall sutfall	een wood is g buildings. ervattives. ppage has Plan are in lity propert ads and pollutants in Codes from Exhibit 2F-1 (ist) 1-Q, 1-U 1-Q, 1-U 1-Q, 1-U
Pollutant Sources	4.3	requirement The facility dried inside Long vacue After rem ceased. Aft place at the All cher Provide the stormwater i Outfail Number 001 002 003 005 006	8.) stores green wood poles and f e the dry kins. All pressure tre im cycles are applied after pre oval from the cylinders, the tre rewards, the treated wood is r facility. No pesticides, herbicid micals are delivered to the faci transfer location and a description of e) unoff. (See instructions for spe Gravel filtration bed and rip Shallow ditch with vegetation Hale bale protected grated i Rip rap, sedimentation traps Hay bales and rip rap	inished treated poles on atment occurs inside the ssure treatment inside the eated wood remains on o removed to final product es, soil conditioners or fe lity by tank truck and are red directly to the chemic disting structural and non- ecific guidance.) Stormmeter Treatme Control Measures and T rap at outfall on cover and rip rap at ou inlet to drainage pipes, ri s and gravel filtration at o	above ground pole runners. All the gro treatment cylinders inside the treating the cylinders to remvoe any excess press overed concrete drip pad until any drip storage areas. A BMP Plan and a SPCC rtifizers are directly applied to the faci unloaded on concrete containment pic cal storage tanks. structural control measures to reduce int	een wood is g buildings. eervattives. ppage has Plan are in lity propert ads and pollutants ir Codes from Exhibit 2F-1 (ist) 1-Q, 1-U 1-Q, 1-U 1-Q, 1-U 1-Q, 1-U

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EPA I A	dentification	n Number 7225	NPDES Permit Number AL0066184	ĸ	Facility Name Coppers Inc.	Form App OMB	proved 03/05/19 No. 2040-0004		
SECTIO	N 3. SITE	DRAINAGE	MAP (40 CFR 122.26(c)(1)(i)(A))						
site inage 1ap	3.1	Have you at specific guid	tached a site drainage map containii ance.)	ng all required	information to this appl	ication? (See instruct	ions for		
Da		🗹 Yes	C	No					
SECTIO	N 4. POL	LUTANT SOU	RCES (40 CFR 122.26(c)(1)(i)(B))						
	4.1	Provide information on the facility's pollutant sources in the table below.							
		Outfall Number	Impervious Surface Ar	ea cilitu)	Total S (within a	urface Area Drained			
		Number		specify units			specify units		
		008	0.21	acres	11.2	7	acres		
				specify units			specify units		
				specify units		and the second se	specify units		
				specify units			specify units		
				specify units			specify units		
				specify units			specify units		
Pollutant Sources		requirement The facility dried insid Long vacue After rem ceased. Aft place at the f All cher	s.) stores green wood poles and finishe e the dry kilns. All pressure treatme ium cycles are applied after pressure oval from the cylinders, the treated erwards, the treated wood is remov facility. No pesticides, herbicides, so micals are delivered to the facility by transferred di	ed treated pole nt occurs insid treatment ins wood remains ved to final pro- iil conditioners y tank truck an irectly to the c	es on above ground pol e the treatment cylinde ide the cylinders to ren s on covered concrete o oduct storage areas. A f s or fertilizers are direct id are unloaded on con- hemical storage tanks.	le runners. All the gre ers inside the treating nvoe any excess prese drip pad until any drip BMP Plan and a SPCC dy applied to the facili crete containment pa	en wood is buildings. ervattives. Ipage has Plan are in ity property. ds and		
	4.3	Provide the	location and a description of existing	structural and	I non-structural control	measures to reduce p	ollutants in		
		stormwater	unoff. (See instructions for specific	guidance.)	161919 15 14 Wandan				
		Outfail Number	Cor		Codes from Exhibit 2F-1 (list)				
		008	Hay bales, rip rap sedimentation	basin			1-Q, 1-U		
			-						

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EPA I Al	dentification	n Number 7225	NPDES Permit Number AL0066184	Facili Kopp	iy Name bers Inc.		Form Approved 03/05/19 OMB No. 2040-0004
SECTION	N 5. NON	STORMWAT	TER DISCHARGES (40 CFR 122.26(c)(1)(i)(C))	ses en a state e briten de l'Arres est		یر دواندر و در از معاد در زیر ۱۹
	5.1	l certify une presence o discharges Name (print	fer penalty of law that the outfall(s) f non-stormwater discharges. Moreo are described in either an accompanyi or type first and last name)	application have at the outfalls ider 2C, 2D, or 2E app Official title	been te ntified a lication.	sted or evaluated for the s having non-stormwater	
		Kevin Wisem	an		Zero Harm Bu	siness U	nit Partner, UIP
8		Signature Keeü	v Wiseman,		Date signed	1,2	2024
arge	5.2	Provide the	testing information requested in the ta	ble below.	· · · · ·	,	
er Disch		Outfall Number	Description of Testing Met	hod Used	Date(s) of Te	esting	Unsite Drainage Points Directly Observed During Test
ormwat		001	Visual		06/28/20	024	001
Non-St		002		6/28/20	24	002	
		003	Vîsuał	6/28/20	24	003	
		005	Visual		6/28/20	24	005
		006 Visual			6/28/20	24	006
		007	Visual		6/28/20	24	007
SECTIO	N 6. SIGI	VIFICANT LE	AKS OR SPILLS (40 CFR 122.26(c)(1)(i)(D))		ين ويني نيز مين من ويني ميني مين	et de la servicit de la décidité
Significant Leaks or Spills	6.1	Describe an N/A	y significant leaks or spills of toxic or h	azardous poliuta	ants in the last three	e years.	
SECTIO	N7. DISC	HARGE INFI	ORMATION (40 CFR 122.26(c)(1)(i)(E))			
r.	See the	instructions t	o determine the pollutants and parame licants need to complete each table	eters you are req	uired to monitor an	d, in turn	i, the tables you must
natic	7.1	Is this a new	v source or new discharge?				
e Inforr		V Yes	See instructions regarding submiss nated data.	ion of	No → See instruct actual data.	tions reg	garding submission of
harg	Tables	A, B, C, and	D		· · · · · · · · · · · · · · · · · · ·	·.	
Discl	7.2	Have you a	ompleted Table A for each outfall?	_			
		L Yes		M	No		

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EPA A	Identificatio	n Number 7225	NPDES Permit Number AL0066184	Faci Kop	lity Name pers Inc.	Form Approved 03/05/19 OMB No. 2040-0004		
SECTIO	N 5. NON	STORMWAT	TER DISCHARGES (40 CFR 122.26(c)(1)(j)(C))	l			
	5.1	I certify und presence o discharges Name (print Kevin Wisem Signature	der penalty of law that the outfall(s) f non-stormwater discharges. Moreou are described in either an accompanyin or type first and last name) an	covered by thi ver, I certify th ng NPDES Forr	red by this application have been tested or evaluated for th I certify that the outfalls identified as having non-stormwate PDES Form 2C, 2D, or 2E application. Official title ZeroHarm Business Unit Partner UIP Date signed			
es		nellin	Malman	-1- 1 - 1	1 41014 1	1 2027		
er Discharg	5.2	Outfail Number	Description of Testing Met	hod Used	Date(s) of Te	Onsite Drainage Points Sting Directly Observed During Test		
Stormwate		008	Visual		06/28/20	024 008		
Non-								
SECTIO	N 6. SIGI	VIFICANT LE	AKS OR SPILLS (40 CFR 122.26(c)(1)(i)(D))				
Significant Leaks or Spills	6.1	Describe an N/A	y significant leaks or spills of toxic or h	azardous pollut	ants in the last three	years.		
SECTIO	N 7. DISC	HARGE INFO	ORMATION (40 CFR 122.26(c)(1)(i)(E))				
Information	See the complet 7.1	instructions to te. Not all app Is this a new Yes	o determine the pollutants and parame licants need to complete each table. y source or new discharge? ◆ See instructions regarding submissi prod data	ters you are rec	uired to monitor and No → See instruct	t, in turn, the tables you must		
ırge l	Tables	A, B, C, and	aleo uala. D		aciual uata.			
scha	7.2	Have you co	mpleted Table A for each outfall?		<u>.</u>			
ā		🔲 Yes		\checkmark	No			

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EPA A	Identificatio	n Number 7225	NPDES Permit Number AL0066184	Fac Kop	lity Name pers Inc.	Form Approved 03/05/19 OMB No. 2040-0004
	7.3	Is the facilit wastewater	y subject to an effluent limitation guide ?	line (ELG) or eff	luent limitations in a	n NPDES permit for its process
		🔲 Yes		\checkmark	No → SKIP to Ite	m 7.5.
	7.4	Have you c	ompleted Table B by providing quantitian ELG and/or (2) subject to effluent I	ative data for the	ose pollutants that an	re (1) limited either directly or
		T Yes			No No	e racinty 3 process wasterwater :
	7.5	Do you kno	w or have reason to believe any pollut	ants in Exhibit 2	F-2 are present in th	ne discharge?
		🖌 Yes			No → SKIP to Ite	m 7.7.
	7.6	Have you li provided qu	sted all pollutants in Exhibit 2F–2 that uantitative data or an explanation for th	you know or hav ose pollutants ir	re reason to believe I Table C?	are present in the discharge and
		🖌 Yes			No	
	7.7	Do you qua	lify for a small business exemption uno	ler the criteria s	pecified in the Instru	ctions?
		Yes	→SKIP to Item 7.18.		No	
	7.8	Do you kno	w or have reason to believe any pollut	ants in Exhibit 2	F–3 are present in t	ne discharge?
	70	Yes			No → SKIP to Ite	m 7.10.
nued	7.9	Table C?	sted all pollutants in Exhibit 21-3 that	you know or hav	e reason to believe	are present in the discharge in
Conti		🗹 Yes			No	
tion	7.10	Do you exp	ect any of the pollutants in Exhibit 2F-	3 to be discharg	ed in concentrations	s of 10 ppb or greater?
orma		🗹 Yes			No 🗲 SKIP to Iter	m 7.12.
arge Inf	7.11	Have you p concentration	rovided quantitative data in Table C for ons of 10 ppb or greater?	those pollutant	s in Exhibit 2F–3 tha	at you expect to be discharged in
Ischi		🗹 Yes			No	
	7.12	Do you exp of 100 ppb	ect acrolein, acrylonitrile, 2,4-dinitroph or greater?	enol, or 2-methy	1-4,6-dinitrophenol to	o be discharged in concentrations
	·	🗋 Yes			No → SKIP to Iter	m 7.14.
	7.13	Have you p discharged	rovided quantitative data in Table C for in concentrations of 100 ppb or greate	r the pollutants in r?	dentified in Item 7.12	2 that you expect to be
		🔲 Yes			No	
	7.14	Have you p discharge a	rovided quantitative data or an explana it concentrations less than 10 ppb (or le	ation in Table C ess than 100 pp	for pollutants you ex b for the pollutants in	pect to be present in the dentified in Item 7.12)?
		🔲 Yes			No	
	7.15	Do you kno	w or have reason to believe any pollut	ants in Exhibit 2	-4 are present in th	ne discharge?
		Yes			No → SKIP to Iter	m 7.17.
	7.16	Have you list explanation	sted pollutants in Exhibit 2F–4 that you in Table C?	know or believe	to be present in the	e discharge and provided an
		Yes			No	
	7.17	Have you p	rovided information for the storm even	t(s) sampled in	Table D?	
		∐ Yes		M	No	

ALI	D06712	27225	LS Permit Number ALOO66184	Koppers Inc.	Form Approved 03/05/ OMB No. 2040-00
	Used o	r Manufactured Toxics			
	7.18	Is any pollutant listed on E manufactured as an interr Yes	ixhibits 2F-2 through 2F-4 a subst nediate or final product or byproduc	ance or a component of a substa t? ☑ No → SKIP to Section	ance used or n 8.
	7.19	List the pollutants below, i	ncluding TCDD if applicable.		
		1.	4.	7.	
		2.	5.	8.	
		3.	6.	9.	
D	8.1	Do you have any knowled any of your discharges or	lge or reason to believe that any bio on a receiving water in relation to y	Nogical test for acute or chronic to our discharge within the last three $\overline{\Box}$ No \rightarrow SKIP to Section	toxicity has been made o ee years? n 9.
	8.2	Identify the tests and their	purposes below.		
		Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
				Yes No	
				Yes No	
TION	9. COI 9.1	NTRACT ANALYSIS INFOR Were any of the analyses	MATION (40 CFR 122.21(g)(12)) reported in Section 7 (on Tables A	Yes No	act laboratory or
TION	9. ČOI 9.1	VTRACT ANALYSIS INFOR Were any of the analyses consulting firm?	MATION (40 CFR 122.21(g)(12)) reported in Section 7 (on Tables A	Yes □ No through C) performed by a contra No → SKIP to Sectio	act laboratory or n 10.
TICN	9. COI 9.1 9.2	NTRACT ANALYSIS INFOR Were any of the analyses consulting firm? Yes Provide information for ea	MATION (40 CFR 122.21(g)(12)) reported in Section 7 (on Tables A ch contract laboratory or consulting	Yes □ No No Yes □ No No SKIP to Section firm below.	act laboratory or n 10.
TION	9. COI 9.1 9.2	VTRACT ANALYSIS INFOR Were any of the analyses consulting firm? Yes Provide information for ea	MATION (40 CFR 122.21(g)(12)) reported in Section 7 (on Tables A ch contract laboratory or consulting Laboratory Number 1	Yes □ No Yes □ No through C) performed by a contra No → SKIP to Sectio firm below. Laboratory Number 2	act laboratory or n 10.
TICN	9. ČOI 9.1 9.2	VTRACT ANALYSIS INFOR Were any of the analyses consulting firm? Yes Provide information for ear Name of laboratory/firm	MATION (40 CFR 122.21(g)(12)) reported in Section 7 (on Tables A ch contract laboratory or consulting Laboratory Number 1 Pace Analytica)	Yes No through C) performed by a contract No → SKIP to Section firm below. Laboratory Number 2	act laboratory or n 10.
TICN	9. ĈOI 9.1 9.2	NTRACT ANALYSIS INFOR Were any of the analyses consulting firm? Yes Provide information for ear Name of laboratory/firm Laboratory address	MATION (40 CFR 122.21(g)(12)) reported in Section 7 (on Tables A ch contract laboratory or consulting Laboratory Number 1 Pace Analytical 1168 Whigham Place Tuscaloosa, AL 35405	Image: Yes No through C) performed by a contraction Image: No → SKIP to Section firm below. Laboratory Number 2	act laboratory or n 10.
TION	9. ĈOI 9.1	VTRACT ANALYSIS INFOR Were any of the analyses consulting firm? Yes Provide information for ear Name of laboratory/firm Laboratory address Phone number	MATION (40 CFR 122.21(g)(12)) reported in Section 7 (on Tables A ch contract laboratory or consulting Laboratory Number 1 Pace Analytical 1168 Whigham Place Tuscaloosa, AL 35405 (205) 614-6630	Image: Provide the sector Image: Provide the sector	act laboratory or n 10.

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EPA A	Identificatio	on Number 27225	NPDES Permit Number AL0066184	Facility Name Koppers Inc.	Form Approved 03/05/19 OMB No. 2040-0004					
SECTIO	0N 10. CH 10.1	ECKLIST AND CERTIN In Column 1 below, m each section, specify all applicants are requ	FICATION STATEMENT (40) ark the sections of Form 2F th in Column 2 any attachments irred to complete all sections of	CFR 122.22(a) and (d)) tat you have completed and are su that you are enclosing to alert the p or provide attachments.	bmitting with your application. For permitting authority. Note that not					
		Column 1		Column 2						
		Section 1	w/ attachments	s (e.g., responses for additional out	italis)					
		Section 2	w/ attachments	5						
		Section 3	w/ site drainag	e map						
		Section 4	w/ attachments	5						
		Section 5	w attachments	3						
-		Section 6	w/ attachments	\$						
มอเมอ		Section 7	Table A	w/ small business e	exemption request					
n Staf			✓ Table B	w/ analytical results	s as an attachment					
ficatio			☐ Table C	Table D						
1 Cert		Section 8	w/attachments		and a second state of the					
ist and		Section 9	w/attachments	w/attachments (e.g., responses for additional contact laboratories or firms)						
heckl		Section 10			C. (M , I. C.					
O	10.2	Certification Statem	ent							
		I certify under penalty of law that this document and all attachments were prepared under my direction or supervise accordance with a system designed to assure that qualified personnel property gather and evaluate the inform submitted. Based on my inquiry of the person or persons who manage the system or those persons directly respon for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate complete. I am aware that there are significant penalties for submitting false information, including the possibility of and imprisonment for knowing violations.								
		Name (print or type fir	st and last name)	Official title						
		Kevin Wiseman		Zero Harm Business Un	it Partner, UIP					
		Signature	\ \	Date signed						
		Kein U	Useinan	July 1.2	024					

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	EPA Identification Number ALD067127225	NPOES Permit Number AL0066184	Facility Nam Koppers In	ie ic,	Outfall Number 001	Form Approved 03/0 OMB No. 2040-	
TA	BLE A CONVENTIONAL AND NON	CONVENTIONAL PARAMETE	RS (40 CFR 122.26(c this table Complete)(1)(l)(E)(3)) ¹	See instructions for a	dutional details and requ	itemente
		Maximum Dal (apecify	lly Discharge units)	Average Dall (specify	y Discharge units)	Number of Oten	Source of Information (new source/new dischargers only, use codes in instructions)
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	
1,	Oil and grease	0 mg/L		0 mg/L		11	
2.	Biochemical oxygen demand (BOD	46.2 mg/L		13.1 mg/L		11	
3.	Chemical oxygen demand (COD)						
4,	Total suspended solids (TSS)	242 mg/L		87 mg/L		11	
5.	Total phosphorus						
6.	Total Kjeldahl nitrogen (TKN)			1			
7.	Total nitrogen (as N)						
	pH (minimum)	6.92					
8.	pH (maximum)	8.43					

	EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Facility Nam Koppers (n	0 IG.	Outfall Number 003	Form Approved 0 OMB No. 204	
TA	BLE A CONVENTIONAL AND NO	N CONVENTIONAL PARAMETE	RS (40 GFR 122 25(c n this table, Complete)(1)(i)(E)(3)) one table for each outfall	See instructions for a	dditional details and red	uiremente.
Manda Alika a Samad	an an an the second	Maximum Da (specifi	ily Discharge	Average Dall	y Discharge	Muster of Oler	Source of Information (new source/new dischargers only, use codes in instructions)
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	
1.	Oil and grease	0 mg/L		0 mg/L		11	CCA Treated Wood
2.	Biochemical oxygen demand (BC	0D5) 38.6 mg/L		11.5 mg/L		11	CCA Treated Wood
3.	Chemical oxygen demand (COD))					
4.	Total suspended solids (TSS)	530 mg/L		88 mg/L		11	CCA Treated Wood
5.	Total phosphorus						
6.	Total Kjeldahl nitrogen (TKN)						
7.	Total nitrogen (as N)						
0	pH (minimum)	7.05					
đ,	pH (maximum)	8.43					

	EPA Identification Number ALD067127225	NPDES Permit Number AL0055184	Facility Nam Koppers In	e ic,	Outfall Number 005		Form Approved 03/05/19 OMB No 2040-0004
TAL	BLE A. CONVENTIONAL AND NON C	ONVENTIONAL PARAMETE	RS (40 CFR 122.26(c this table, Complete)(1)(i)(E)(3)) ¹ one table for each outfall.	See instructions for a	ditional details and reg	uirements.
		Maximum Dai (specify	ly Discharge units)	Average Dail (specily	y Discharge units)	Number of Class	Source of Information (new source/new dischargers only, use codes in instructions)
	Pollutant or Parameter	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	
1.	Oil and grease	0 mg/L		0 mg/L		11	CCA Treated Wood
2.	Biochemical oxygen demand (BODs)	49.2 mg/L		25.4 mg/L		11	CCA Treated Wood
3.	Chemical oxygen demand (COD)						
4.	Total suspended solids (TSS)	417 mg/L		140 mg/L		11	CCA Treated Wood
5.	Total phosphorus						
6,:	Total Kjeldahl nitrogen (TKN)						
7:	Total nitrogen (as N)						
	pH (minimum)	7.05					
0.	pH (maximum)	8.43					

EPA Identification Number ALD067127225	NPDES Permit Number AL0066184	Permit Number Facility Name 1066184 Koppers Inc.		Outfall Number 001		Form Approved 03/05/ OMB No. 2040-00	
TABLE B. CERTAIN CONVENTIONAL	AND NON CONVENTIONAL P	DELUTANTS (40 CFI	R 122 26(c)(1)(l)(E)(4) and	140 CFR 122.21(g)(7)	(vi)(A)) ¹		
List each pollutant that is limited in an e facility is operating under an existing NF	fluent limitation guideline (ELG) DES permit). Complete one tabl	that the facility is subj e for each outfall. See	act to or any pollutant liste the instructions for addition	d in the facility's NPDE onal details and require	ES permit for its process ements.	wastewater (if the	
	Maximum Dai (specify	ly Discharge (units)	Average Dall (specify	y Discharge units)	Number of Storm	Source of Information (new source/new dischargers only; use codes in instructions)	
Pollutant and CAS Number (if avail	able) Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled		
N/A							

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

EPA Identification Number ALD067127225	NPDE	S Permit Number ALOO66184	Facility Nam Koppers In	10 1 C .	Outfall Number 003		Form Approved 03/05/1 OMB No. 2040-000
TABLE B. CERTAIN CONVENTIONA	LANDNO	ON CONVENTIONAL PO	DLUUTANTS (40 CFF	R 122.26(c)(1)(i)(E)(4) and	140 CFR 122.21(g)(/)	(vi)(A)) ¹	
List each pollutant that is limited in an facility is operating under an existing N	effluent lin IPDES per	nitation guideline (ELG) to rmit). Complete one table	hat the facility is subjected for each outfall. See	ect to or any pollutant liste the instructions for addition	d in the facility's NPDE onal details and require	ES permit for its process ements.	wastewater (if the
	an a	Maximum Dail (specify	ly Discharge units)	Average Dall	y Discharge units)		Source of Information (new source/new dischargers only, use codes in instructions)
Pollutant and CAS Number (if ava	ilable)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	
N/A							
						1	

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

EPA Identification Number ALD067127225	IPDES Permit Number AL0066184	Facility Nam Koppers In	e	Oulfall Number 005		Form Approved 03/05/1 OMB No. 2040-000
TABLE B. CERTAIN CONVENTIONAL AND List each pollutant that is limited in an efflue facility is operating under an existing NPDES	NON CONVENTIONAL Part limitation guideline (ELG) is permit). Complete one table	OLLUTANTS (40 CFF that the facility is subje e for each outfall. See	t 122 25(c)(1)(i)(E)(4) and to or any pollutant liste the instructions for addition	I 40 CFR 122 21(g)(7) d in the facility's NPDE onal details and require	(vi)(A)) ¹ S permit for its process iments.	wastewater (if the
	Maximum Dai	ly Discharge	Average Dally	y Discharge		Source of
Pollutant and CAS Number (if available	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	- Number of Storm Events Sampled	(new source/new dischargers only: use codes in instructions)
N/A .						
			_			
······································						
· · · · · · · · · · · · · · · · · · ·						

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

EPA Identification Number ALD067127225	NPO	ES Permit Number AL0066184	Faqiliy Nar Koppers Ir	ie ic.	Outfall Number 001	Form Approved 03/05 OMB No. 2040-01	
TABLE C. TOXIC POLLUTANTS, C	CERTAIN H	AZARDOUS SUBSTANC	ES, AND ASBESTO	S (40 CFR 122.26(c)(1)(l)	(E)(4) and 40 CFR 12.	2.21(g)(7)(vl)(B) and (v	II)) ¹
List each pollutant shown in Exhibite details and requirements.	s 2F2, 2F	3, and 2F-4 that you know	w or have reason to b	elieve is present. Complet	e one table for each o	utfall. See the instruction	ns for additional
	***	Maximum Dai (specify	ly Discharge units)	Average Dail	y Discharge units)	Number of Storm	Source of Information
Pollutant and CAS Number (if	available)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only, use codes in instructions)
Arsenic		1.1 mg/L		0.34881 mg/L		11	ted/ Untreated Woo
Chromium		2.7 mg/L		0.714 mg/L		11	ted/Untreated Wood
Copper		0.670 mg/L		0.202 mg/L		11	ted/Untreated Wood
					Haril an Haring an Anna an Anna 		nine fan en de serve fan en en en de serve ministre de fan en de serve fan en de serve fan en de serve ministre
	<u> </u>						
						-	
			na an dh' fandar 'n faffan da ar agan - an anda				
allen en e							

EPA Form 351C-2F (Revised 3-19)

EPA Identification Number ALD067127225	NPD	ES Permit Number AL0066184	S Permit Number Fadility Name LO066184 Koppers Inc		Outfall Number 003	Form Approved 03/ OMB No. 2040	
TABLE C. TOXIC POLLUTANTS, C	ERTAIN H	AZARDOUS SUBSTANC	ES, AND ASBESTO	S (40 CFR 122 26(c)(1)(i)	(E)(4) and 40 CFR 12.	2 21(g)(7)(vi)(B)iand (v	n)))(
List each pollutant shown in Exhibits details and requirements.	2F-2, 2F-	3, and 2F-4 that you know	v or have reason to b	elleve is present. Complet	e one table for each o	utfall. See the instruction	ns for additional
		Maximum Dail (specify	y Discharge units)	Average Daily (specify	y Discharge units)	Number of Storm	Source of Information (new source/new dischargers only; use codes in instructions)
Pollutant and CAS Number (#a	vallable)	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	
Arsenic		0.45 mg/L		0.09918 mg/L		11	A Treated Wood Stor
Chromium		1.3 mg/L		0.295 mg/L		11	A Treated Wood Stor
Copper		0.430 mg/L		0.097 mg/L		11	A Treated Wood Stor
Benzene		ND		ND		11	Penta Wood Treated
2, 4, 6 TCP.		ND		ND		11	Penta Wood Treater
4-Nitrophenol		ND		ND		11	Penta Wood Treated
Phenol		ND		ND		11	Penta Wood Treated
Pentachlorophenol		0,0152		0.00138		11	Penta Wood Treated

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EPA Identification Number ALD067127225	EPA Identification Number NPDES Permit Number ALD067127225 AL0066184		ne nc.	Outfall Number 005		Form Approved 03/05/19 OMB No. 2040-0004
TABLE C. TOXIC POLLUTANTS, CERT	AIN HAZARDOUS SUBSTANC	ES, AND ASBESTO	S (40 CFR 122 26(c)(1)(i)	(E)(4) and 40 CFR 12	2.21(g)(7)(vi)(B) and (v	ii)) ¹
List each pollutant shown in Exhibits 2F- details and requirements.	2, 2F–3, and 2F–4 that you know	w or have reason to b	elieve is present. Complet	e one table for each o	utfall. See the instruction	ns for additional
	Maximum Dail (specify	Maximum Daily Discharge (specify units)		y Discharge units)	Number of Storm	Source of Information
Pollutant and CAS Number (if availat	ble) Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Events Sampled	(new source/new dischargers only; use codes in instructions)
Arsenic	0.12 mg/L		0.03827 mg/L		11	A Treated Wood Stor
Chromlum	0.42 mg/L		0.091 mg/L		11	A Treated Wood Stor
Соррег	0.150 mg/L		0.045 mg/L		11	A Treated Wood Stor
Benzene	ND		ND		11	Penta Wood Treated
2, 4, 6 TCP.	ND		ND		11	Penta Wood Treated
4-Nitrophenoi	ND		ND		11	Penta Wood Treated
Phenol	ND		ND		11	Penta Wood Treated
Pentachlorophenol	0.22 mg/L		0.06828 mg/L		11	Penta Wood Treated
				ip diska sama mamaka kata kanya da yan Barrak nga sanga		

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EPA Identification Number NPDES Permit N ALD067127225 AL006618		Number 84	mber Facility name Koppers Inc.		umber 1	Form Approved 03/05/11 OMB No. 2040-000	
TABLE D. STORM EVEN	IT INFORMATION (40 CFR 12	2.26(c)(1)(i)(E)(6))		L. Hand			
Provide data for the storn	n event(s) that resulted in the m	naximum daily discharges for	the flow-weighted compo	site sample.			
Date of Storm Event Duration of Storm Event (in hours)		Total Rainfall During Storm Event (in inches)	Number of Hours Between Beginning of Storm Measured and End of Previous Measurable Rain Event		Maximum Flow Rate During Rain Event (in gpm or specify units)	Total Flow from Rain Even (in gallons or specify units)	
⁹ rovide a description of t VIII add when sampling f	ne method of flow measuremer or renewal is able to be done.	nt or estimate.					

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

EPA Identification Number NPDES Permit Nur ALD067127225 AL0065184		Number F 84 Ki	ber Facility name Outfa Koppers inc.		umber 3	Form Approved 03/05/ OMB No. 2040-00	
ABLE D. STORM EVEN	IT INFORMATION (40 CFR 12	2.26(c)(1)(i)(E)(6))		-			
rovide data for the storn	n event(s) that resulted in the m	aximum daily discharges for	the flow-weighted comp	osite sample.			
Date of Storm Event Du	Duration of Storm Event (in hours)	Total Rainfall During Storm Event (In inches)	Number of Hours Between Event End of Previous Measurat Event Event		Maximum Flow Rate During Rain Event (In gpm or specify units)	Total Flow from Rain Ev (in gallons or specify units)	
ovide a description of t	ne method of flow measuremen or renewal is able to be done.	t or estimate.					

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

EPA Identification Number NPDES Permit N ALD067127225 AL006618		it Number 184	iber Facility name Outfa Koppers Inc.		Outfall N 00	umber 5	Form Approved 03/05/ OMB No. 2040-00
TABLE D. STORM EVEN	IT INFORMATION (40 CFR 1	22.26(c)(1)(i)(E)(6	6))				
Provide data for the storn	event(s) that resulted in the	maximum daily dia	scharges for the	flow-weighted compos	ite sample.		
Date of Storm Event	Duration of Storm Event (in hours)	n of Storm Event (in hours) Total Rainfall During Storm Event (in inches)		Number of Hours Between Beginning of Storm Measured and End of Previous Measurable Rain Event		Maximum Flow Rate During Rain Event (In gpm or specify units)	Total Flow from Rain Even (In gallons or specify units)
rovide a description of t /III add when sampling f	ne method of flow measurem or renewal is able to be done	ont or estimate.					

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







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Koppers Utility and Industrial Products, Kennedy Plant NPDES PERMIT # AL0066184 2023 BOILER CHEMICAL INFORMATION

Zee Company, Inc. Boiler Chemicals Used	Use Description	Daily Quantities Used	Annual Usage (2023)	Composition	%
STEAM 150	Neutralizing Amine	30-40 ppm per 100 gallons fresh water	110 gallons	Morpholine	<10%
				Cyclohexylamine	<10%
				Diethylethanolamine	<10%
FEEDW 4	Oxygen Scavenger	30-40 ppm per 100 gallons fresh water	110 gallons	Sodium Bisulfite	<40%
·····				Potassium Hydroxide	<5%
BLR 10	Sludge Conditioner (Corrosion Inhibitor)	30-40 ppm per 100 gallons fresh water	55 gallons	Sodium Hexametaphosphate	<20%
· · · · · · · · · · · · · · · · · · ·					
	Р	er Chemical Supplier, N	o Biocides in us	е	



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Printing date 03/24/2015

Reviewed on 03/24/2015

1 Identification

- · Product identifier Industrial water treatment compound
- · Trade name: STEAM 150
- · Article number: WST150A
- Details of the supplier of the safety data sheet • Manufacturer/Supplier: ZEE COMPANY, INC.
- 4146 South Creek Road
- Chattanooga, TN 37406

• Information department: Technical Services: 423-698-1401 • Emergency telephone number: CHEMTREC: 800-424-9300

2 Hazard(s) identification





H361 Suspected of damaging fertility or the unborn child.



Skin Corr. 1B H314 Causes severe skin burns and eye damage. Eye Dam. 1 H318 Causes serious eye damage.



Repr. 2

Acute Tox. 4 H302 Harmful if swallowed. Acute Tox. 4 H312 Harmful in contact with skin.

· Classification according to Directive 67/548/EEC or Directive 1999/45/EC

Corrosive

Causes burns.

िर्रे Harmful

Possible risk of impaired fertility.



Irritating to respiratory system.

· Information concerning particular hazards for human and environment:

The product has to be labeled due to the calculation procedure of international guidelines.

(Contd. on page 2)

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(Contd.	of	page	1)
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• Classification system: The classification was made according to the latest editions of international substances lists, and expanded upon from company and literature data.

· Label elements

• Labelling according to EU guidelines: The product has been classified and marked in accordance with directives on hazardous materials.

· Code letter and hazard designation of product:



Corrosive

· Hazard-determining components of labeling:

cyclohexylamine

2-diethylaminoethanol

· Risk phrases:

Causes burns. Irritating to respiratory system. Possible risk of impaired fertility.

· Safety phrases:

Keep locked up and out of the reach of children.

In case of contact with eyes, rinse immediately with running water for at least 15 minutes. Get medical attention.

Wear suitable protective clothing, gloves and eye/face protection.

In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

Dispose of this material and its container to hazardous or special waste collection point.

· Classification system:

• NFPA ratings (scale 0 - 4)



Health = 2Fire = 0Reactivity = 1

· HMIS-ratings (scale 0 - 4)



· Other hazards

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

3 Composition/information on ingredients

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

· Dangerous components:

108-91-8 cyclohexylamine

10-15%

(Contd. on page 3)

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Trade name: STEAM 150

100-37-8 2-diethylaminoethanol

(Contd. of page 2) 2.5-10%

4 First-aid measures

· Description of first aid measures

- · General information: Immediately remove any clothing soiled by the product.
- · After inhalation: Remove to fresh air. If symptoms persist consult a doctor.
- · After skin contact:

Remove contaminated clothing and flush area with running water for a minimum of 15 minutes. If irritation persists consult a doctor.

After eye contact:

Immediately flush open eye with running water for a minimum of 15 minutes. Immediately get medical attention.

· After swallowing:

Immediately contact a doctor or Poison Control Center.

Do not induce vomiting. Rinse mouth out with water, and drink several glasses of water. Never give anything by mouth to an unconscious person.

- Most important symptoms and effects, both acute and delayed No further relevant information available.
- Indication of any immediate medical attention and special treatment needed No further relevant information available.

5 Fire-fighting measures

- · Extinguishing media
- · Suitable extinguishing agents:
- CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
- Special hazards arising from the substance or mixture No further relevant information available.
- Advice for firefighters
- · Protective equipment: No special measures required.

6 Accidental release measures

- Personal precautions, protective equipment and emergency procedures Wear protective equipment. Keep unprotected persons away.
- · Environmental precautions:
- Dilute with plenty of water.

Do not allow to penetrate the ground/soil.

- Do not allow to enter surface or ground water.
- Methods and material for containment and cleaning up:
- Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).

Use neutralizing agent. Dispose contaminated material as waste according to item 13.

Ensure adequate ventilation.

- · Reference to other sections
- See Section 7 for information on safe handling.
- See Section 8 for information on personal protection equipment.
- See Section 13 for disposal information.

(Contd. on page 4)

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Trade name: STEAM 150

(Contd. of page 3)

7 Handling and storage

- Precautions for safe handling
 Ensure good ventilation/exhaustic
- Ensure good ventilation/exhaustion at the workplace. Prevent formation of aerosols.
- · Information about protection against explosions and fires: No special measures required.
- · Conditions for safe storage, including any incompatibilities
- · Storage:
- **Requirements to be met by storerooms and receptacles:** Keep this and all chemicals out of the reach of children.
- Store in a cool, dry, well ventilated area.
- · Information about storage in one common storage facility: Not required.
- · Further information about storage conditions: Keep receptacle tightly sealed.
- · Specific end use(s) No further relevant information available.

8 Exposure controls/personal protection

· Additional information about design of technical systems: No further data; see item 7.

· Control parameters

· Components with limit values that require monitoring at the workplace:

108-91-8 cyclohexylamine

REL Long-term value: 40 mg/m³, 10 ppm

TLV Long-term value: 41 mg/m³, 10 ppm

100-37-8 2-diethylaminoethanol

- PEL Long-term value: 50 mg/m³, 10 ppm Skin
- REL Long-term value: 50 mg/m³, 10 ppm Skin
- TLV Long-term value: 9.6 mg/m³, 2 ppm Skin

· Additional information: The lists that were valid during the creation were used as basis.

- · Exposure controls
- Personal protective equipment:
- General protective and hygienic measures:
- Keep away from foodstuffs, beverages and feed.
- Immediately remove all soiled and contaminated clothing.
- Wash hands before breaks and at the end of work.
- Avoid contact with the eyes and skin.
- · Breathing equipment: Not necessary if room is well-ventilated.
- · Protection of hands:



Protective gloves

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation. Due to missing tests no recommendation to the glove material can be given for the product/ the preparation/ the chemical mixture.

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(Contd. of page 4)

Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation

· Material of gloves

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

· Penetration time of glove material

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

· Eye protection:



Tightly sealed goggles

· Body protection: Protective work clothing

9 Physical and chemical properties

 Information on basic physical and General Information 	chemical properties
Appearance:	
Form:	Liquid
Color:	Colorless
· Odor:	Amine-like
· Odor threshold:	Not determined.
· pH-value at 20 °C (68 °F):	12.5
· Change in condition	
Melting point/Melting range:	Undetermined.
Boiling point/Boiling range:	Undetermined.
· Flash point:	Not applicable.
· Flammability (solid, gaseous):	Not applicable.
· Ignition temperature:	
Decomposition temperature:	Not determined.
· Auto igniting:	Product is not selfigniting.
· Danger of explosion:	Product does not present an explosion hazard.
· Explosion limits:	
Lower:	Not determined.
Upper:	Not determined.
· Vapor pressure:	Not determined.
· Density at 20 °C (68 °F):	0.995 g/cm³ (8.303 lbs/gal)
· Relative density	Not determined.
· Vapor density	Not determined.
· Evaporation rate	Not determined.
	(Contd. on page

(Contd. of page 5)

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Trade name: STEAM 150

		(
· Solubility in / Miscibility with		
Water:	Fully miscible.	
· Partition coefficient (n-octan	ol/water): Not determined.	
· Viscosity:		
Dynamic:	Not determined.	
Kinematic:	Not determined.	
· Other information	No further relevant information available.	

10 Stability and reactivity

- · Reactivity
- · Chemical stability Stable
- · Thermal decomposition / conditions to be avoided:
- No decomposition if used according to specifications.
- · Possibility of hazardous reactions No dangerous reactions known.
- · Conditions to avoid No further relevant information available.
- · Incompatible materials: No further relevant information available.
- · Hazardous decomposition products: No dangerous decomposition products known.

11 Toxicological information

- · Information on toxicological effects
- · Acute toxicity:
- · LD/LC50 values that are relevant for classification:

108-91-8 cyclohexylamine

Oral LD50 156 mg/kg (rat)

Dermal LD50 277 mg/kg (rabbit)

100-37-8 2-diethylaminoethanol

Oral LD50 1300 mg/kg (rat)

Inhalative LC50/4 h 5 mg/l (mouse)

· Primary irritant effect:

• on the skin: Caustic effect on skin and mucous membranes.

· on the eye: Strong caustic effect.

- · Sensitization: No sensitizing effects known.
- · Additional toxicological information:

The product shows the following dangers according to internally approved calculation methods for preparations:

Corrosive

Irritant

Swallowing will lead to a strong caustic effect on mouth and throat and to the danger of perforation of esophagus and stomach.

· Carcinogenic categories

· IARC (International Agency for Research on Cancer)	
110-91-8 morpholine	3
· NTP (National Toxicology Program)	
None of the ingredients is listed.	
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(Contd. of page 6)

· OSHA-Ca (Occupational Safety & Health Administration)

None of the ingredients is listed.

12 Ecological information

· Toxicity

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

Water hazard class 1 (Self-assessment): slightly hazardous for water

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

Must not reach bodies of water or drainage ditch undiluted or unneutralized.

Rinse off of bigger amounts into drains or the aquatic environment may lead to increased pH-values. A high pH-value harms aquatic organisms. In the dilution of the use-level the pH-value is considerably reduced, so that after the use of the product the aqueous waste, emptied into drains, is only low water-dangerous.

- · Results of PBT and vPvB assessment
- · **PBT:** Not applicable.
- · vPvB: Not applicable.
- · Other adverse effects No further relevant information available.

13 Disposal considerations

- · Waste treatment methods
- · Recommendation: Dispose of in accordance with federal, state, and local regulations.
- · Uncleaned packagings:
- Recommendation: Disposal must be made according to official regulations.
- · Recommended cleansing agent: Water, if necessary with cleansing agents.

basic, organic, n.o.s. (Cyclohexylamine thanol)
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Trade name: STEAM 150

	(Contd. of page
Label	8
Class	8 Corrosive substances
Label	8
IMDG, IATA	
The second secon	
Class	8 Corrosive substances
Label	8
Packing group	
DOT, IMDG, IATA	1
Environmental hazards:	
Marine pollutant:	No
Special precautions for user	Warning: Corrosive substances
Danger code (Kemler):	80
EMS Number:	F-A,S-B
Segregation groups	Alkalis
Transport in bulk according to Annex	ll of
MARPOL73/78 and the IBC Code	Not applicable.
Transport/Additional information:	
DOT	
Quantity limitations	On passenger aircraft/rail: 1 L
	On cargo aircraft only: 30 L
IMDG	
Limited quantities (LQ)	1L
Excepted quantities (EQ)	Code: E2
	Maximum net quantity per inner packaging: 30 ml
	Maximum net quantity per outer packaging: 500 ml
UN "Model Regulation":	UN3267, Corrosive liquid, basic, organic, n.o.s
	(Cyclohexylamine, 2-Diethylaminoethanol), 8, II

15 Regulatory information

 \cdot Safety, health and environmental regulations/legislation specific for the substance or mixture \cdot Sara

· Section 355 (extremely hazardous substances):

108-91-8 cyclohexylamine

· Section 313 (Specific toxic chemical listings):

None of the ingredients is listed.

• TSCA (Toxic Substances Control Act):

All ingredients are listed.

(Contd. on page 9)

(Contd. of page 8)

A4

A4

Safety Data Sheet acc. to OSHA HCS

Printing date 03/24/2015

Reviewed on 03/24/2015

Trade name: STEAM 150

Propositio	n 65
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· Chemicals known to cause cancer:

None of the ingredients is listed.

· Chemicals known to cause reproductive toxicity for females:

None of the ingredients is listed.

· Chemicals known to cause reproductive toxicity for males:

None of the ingredients is listed.

- · Chemicals known to cause developmental toxicity:
- None of the ingredients is listed.
- · Carcinogenic categories

· EPA (Environmental Protection Agency)

None of the ingredients is listed.

· TLV (Threshold Limit Value established by ACGIH)

108-91-8 cyclohexylamine

110-91-8 morpholine

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

None of the ingredients is listed.

· Product related hazard informations:

The product has been classified and marked in accordance with directives on hazardous materials.

· Hazard symbols:



 Hazard-determining components of labeling: cyclohexylamine 2-diethylaminoethanol

• Risk phrases: Causes burns. Irritating to respiratory system. Possible risk of impaired fertility.

· Safety phrases:

Keep locked up and out of the reach of children.

In case of contact with eyes, rinse immediately with running water for at least 15 minutes. Get medical attention.

Wear suitable protective clothing, gloves and eye/face protection.

In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

Dispose of this material and its container to hazardous or special waste collection point.

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

16 Other information

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

(Contd. on page 10)

– USA -

Printing date 03/24/2015

Reviewed on 03/24/2015

Trade name: STEAM 150

	(Contd. of page 9)
Contact: Jim Faller/Keith Seyfried	
Date of preparation / last revision 03/24/2015 / -	
Abbreviations and acronyms:	
ADR: Accord européen sur le transport des marchandises dangereuses par Route (European A	greement concerning the
International Carriage of Dangerous Goods by Road)	
MDG: International Maritime Code for Dangerous Goods	
DOT: US Department of Transportation	
ATA: International Air Transport Association	
ACGIH: American Conference of Governmental Industrial Hygienists	
EINECS. European List of Notified Chemical Substances	
CAS: Chemical Abstracts Service (division of the American Chemical Society)	
NFPA: National Fire Protection Association (USA)	
HMIS: Hazardous Materials Identification System (USA)	
VOC: Volatile Organic Compounds (USA, ÉU)	
LC50: Lethal concentration, 50 percent	
LD50: Lethal dose, 50 percent	
Acute Tox. 4: Acute toxicity, Hazard Category 4	
Skin Corr. 1B: Skin corrosion/irritation, Hazard Category 1B	
Eye Dam. 1: Serious eye damage/eye irritation, Hazard Category 1 Repr. 2: Reproductive texisity. Hererd Category 2	
Tepr. 2. Reproductive toxicity, nazaru Gategory z	



Printing date 03/17/2015

Reviewed on 03/17/2015

1 Identification

- · Product identifier Industrial water treatment compound
- Trade name: FEEDWATER 4
- Article number: WFE4A
- Details of the supplier of the safety data sheet
 Manufacturer/Supplier:
 ZEE COMPANY, INC.
 4146 South Creek Road
 Chattanooga, TN 37406
- Information department: Technical Services: 423-698-1401 • Emergency telephone number: CHEMTREC: 800-424-9300

2 Hazard(s) identification

· Classification of the substance or mixture The product is not classified according to the Globally Harmonized System (GHS). Classification according to Directive 67/548/EEC or Directive 1999/45/EC Contact with acids liberates toxic gas. · Information concerning particular hazards for human and environment: The product has to be labeled due to the calculation procedure of international guidelines. · Classification system: The classification was made according to the latest editions of international substances lists, and expanded upon from company and literature data. · Label elements · Labelling according to EU guidelines: The product has been classified and marked in accordance with directives on hazardous materials. · Risk phrases: Contact with acids liberates toxic gas. · Safety phrases: Avoid contact with eyes. This material and its container must be disposed of as hazardous waste. · Classification system: · NFPA ratings (scale 0 - 4) Health = 1 Fire = 0Reactivity = 1 · HMIS-ratings (scale 0 - 4) HEALTH 1 Health = 1 FIRE Fire = 00 Reactivity = 1 REACTIVITY 1 (Contd. on page 2) USA

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(Contd. of page 1)

15-25%

Safety Data Sheet acc. to OSHA HCS

Printing date 03/17/2015

Reviewed on 03/17/2015

Trade name: FEEDWATER 4

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

3 Composition/information on ingredients

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

· Dangerous components:

7631-90-5 sodium bisulfite

4 First-aid measures

- Description of first aid measures
- · After inhalation: Remove to fresh air. If symptoms persist consult a doctor.
- · After skin contact:
- Generally the product does not irritate the skin.
- Immediately wash with water and soap and rinse thoroughly.
- · After eye contact:

Rinse opened eye for a minimum of 15 minutes with running water. If symptoms persist, consult a doctor.

- · After swallowing:
- If symptoms persist consult doctor.
- Do not induce vomiting. Rinse mouth out with water, and drink several glasses of water. Never give anything by mouth to an unconscious person.
- Most important symptoms and effects, both acute and delayed No further relevant information available.
- Indication of any immediate medical attention and special treatment needed No further relevant information available.

5 Fire-fighting measures

- · Extinguishing media
- · Suitable extinguishing agents:
- CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
- Special hazards arising from the substance or mixture No further relevant information available.
- Advice for firefighters
- · Protective equipment: Mouth respiratory protective device.

6 Accidental release measures

- Personal precautions, protective equipment and emergency procedures Mount respiratory protective device.
- · Environmental precautions:
- Dilute with plenty of water.
- Do not allow to penetrate the ground/soil.

Do not allow to enter surface or ground water.

(Contd. on page 3)

- USA

Printing date 03/17/2015

Reviewed on 03/17/2015

Trade name: FEEDWATER 4

(Contd. of page 2)

- · Methods and material for containment and cleaning up:
- Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).
- · Reference to other sections

See Section 7 for information on safe handling.

- See Section 8 for information on personal protection equipment.
- See Section 13 for disposal information.

7 Handling and storage

- Precautions for safe handling No special precautions are necessary if used correctly.
- · Information about protection against explosions and fires: No special measures required.
- · Conditions for safe storage, including any incompatibilities
- · Storage:
- Requirements to be met by storerooms and receptacles: Keep this and all chemicals out of the reach of children. Store in a cool, dry, well ventilated area.
- · Information about storage in one common storage facility: Do not store together with acids. · Further information about storage conditions: None.
- · Specific end use(s) No further relevant information available.

8 Exposure controls/personal protection

· Additional information about design of technical systems: No further data; see item 7.

· Control parameters

· Components with limit values that require monitoring at the workplace:

7631-90-5 sodium bisulfite

REL Long-term value: 5 mg/m³

TLV Long-term value: 5 mg/m³

· Additional information: The lists that were valid during the creation were used as basis.

· Exposure controls

- · Personal protective equipment:
- · General protective and hygienic measures: Wash hands before breaks and at the end of work.
- · Breathing equipment: Not necessary if room is well-ventilated.
- · Protection of hands:

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation. Due to missing tests no recommendation to the glove material can be given for the product/ the preparation/ the chemical mixture.

Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation

Material of gloves

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

Penetration time of glove material

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

· Eye protection: Goggles recommended during refilling.

(Contd. on page 4) -1154

(Contd. of page 3)

Safety Data Sheet acc. to OSHA HCS

Printing date 03/17/2015

Reviewed on 03/17/2015

Trade name: FEEDWATER 4

Body protection: Protective work clothing

Physical and chemical properties		
· Information on basic physical and · General Information	chemical properties	
· Appearance:	t fan det	
Form:	Liquid	
Color:	Ligni yellow	
· Odor threshold:	Not determined	
· pH-value at 20 °C (68 °F):	5.9	
Change in condition		
Melting point/Melting range:	Undetermined.	
Boiling point/Boiling range:	Undetermined.	
· Flash point:	Not applicable.	
· Flammability (solid, gaseous):	Not applicable.	
· Ignition temperature:		
Decomposition temperature:	Not determined.	
· Auto igniting:	Product is not selfigniting.	
· Danger of explosion:	Product does not present an explosion hazard.	
· Explosion limits:		
Lower:	Not determined.	
Upper:	Not determined.	
· Vapor pressure:	Not determined.	
· Density at 20 °C (68 °F):	1.235 g/cm ³ (10.306 lbs/gal)	
· Relative density	Not determined.	
 Vapor density 	Not determined.	
 Evaporation rate 	Not determined.	
· Solubility in / Miscibility with		
Water:	Fully miscible.	
· Partition coefficient (n-octanol/wa	ter): Not determined.	
· Viscosity:		
Dynamic:	Not determined.	
Kinematic:	Not determined.	
 Other information 	No further relevant information available.	

10 Stability and reactivity

· Reactivity

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

No decomposition if used according to specifications.

· Possibility of hazardous reactions Contact with acids releases toxic gases.

(Contd. on page 5)

⁻ USA

Printing date 03/17/2015

Reviewed on 03/17/2015

Trade name: FEEDWATER 4

(Contd. of page 4)

3

- · Conditions to avoid No further relevant information available.
- · Incompatible materials: No further relevant information available.

· Hazardous decomposition products: No dangerous decomposition products known.

11 Toxicological information

· Information on toxicological effects

· Acute toxicity:

· LD/LC50 values that are relevant for classification:

7631-90-5 sodium bisulfite

Oral LD50 2000 mg/kg (rat)

- · Primary irritant effect:
- on the skin: No irritant effect.
- · on the eye: No irritating effect.
- · Sensitization: No sensitizing effects known.
- · Additional toxicological information:

· Carcinogenic categories

· IARC (International Agency for Research on Cancer)

7631-90-5 sodium bisulfite

· NTP (National Toxicology Program)

None of the ingredients is listed.

· OSHA-Ca (Occupational Safety & Health Administration)

None of the ingredients is listed.

12 Ecological information

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

Water hazard class 1 (Self-assessment): slightly hazardous for water

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

- · Results of PBT and vPvB assessment
- PBT: Not applicable.
- **vPvB:** Not applicable.
- · Other adverse effects No further relevant information available.

13 Disposal considerations

· Waste treatment methods

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

(Contd. on page 6)

USA

Printing date 03/17/2015

Reviewed on 03/17/2015

Trade name: FEEDWATER 4

(Contd. of page 5)

· Uncleaned packagings:

Recommendation: Disposal must be made according to official regulations.
 Recommended cleansing agent: Water, if necessary with cleansing agents.

4 Transport information	
· UN-Number · DOT, IMDG, IATA	UN1760
 UN proper shipping name DOT, IMDG, IATA 	Corrosive liquids, n.o.s. (sodium bisulfite)
· Transport hazard class(es)	
·DOT	
Class	8 Corrosive substances
· Label	8 8 Corrective substances
· Class · Label	o Corrosive substances
· Class	8 Corrosive substances
·Label	8
· Packing group · DOT, IMDG, IATA	111
 Environmental hazards: Marine pollutant: 	Νο
· Special precautions for user	Warning: Corrosive substances
· Danger code (Kemler):	80 5 A S B
Transport in bulk according to Annex MARPOL73/78 and the IBC Code	Il of Not applicable.
· Transport/Additional information	
·DOT	
• Quantity limitations	On passenger aircraft/rail: 5 L On cargo aircraft only: 60 L
· IMDG · Limited quantities (LO)	51

Printing date 03/17/2015

Reviewed on 03/17/2015

Trade name: FEEDWATER 4

	(Contd. of page 6)
· Excepted quantities (EQ)	Code: E1 Maximum net quantity per inner packaging: 30 ml Maximum net quantity per outer packaging: 1000 ml
· UN "Model Regulation":	UN1760, Corrosive liquids, n.o.s. (sodium bisulfite), 8, III

15 Regulatory information

Safety, health and environmental regulations/legislation specific for the substance or mixture	
Sara	

Section 355 (extremely hazardous substances):

None of the ingredients is listed.

Section 313 (Specific toxic chemical listings):

None of the ingredients is listed.

• TSCA (Toxic Substances Control Act):

All ingredients are listed.

Proposition 65

Chemicals known to cause cancer:

None of the ingredients is listed.

Chemicals known to cause reproductive toxicity for females:

None of the ingredients is listed.

· Chemicals known to cause reproductive toxicity for males:

None of the ingredients is listed.

· Chemicals known to cause developmental toxicity:

None of the ingredients is listed.

· Carcinogenic categories

· EPA (Environmental Protection Agency)

None of the ingredients is listed.

· TLV (Threshold Limit Value established by ACGIH)

7631-90-5 sodium bisulfite

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

None of the ingredients is listed.

• Product related hazard informations: The product has been classified and marked in accordance with directives on hazardous materials.

• **Risk phrases:** Contact with acids liberates toxic gas.

· Safety phrases:

Avoid contact with eyes.

This material and its container must be disposed of as hazardous waste.

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

(Contd. on page 8)

USA

A4

Printing date 03/17/2015

Reviewed on 03/17/2015

Trade name: FEEDWATER 4

(Contd. of page 7)

16 Other information

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

- · Contact: Jim Faller/Keith Seyfried
- · Date of preparation / last revision 03/17/2015 / -

Abbreviations and acronyms:
 ADR: Accord européen sur le transport des marchandises dangereuses par Route (European Agreement concerning the
 International Carriage of Dangerous Goods by Road)
 IMDG: International Maritime Code for Dangerous Goods
 DOT: US Department of Transportation
 IATA: International Air Transport Association
 ACGIH: American Conference of Governmental Industrial Hygienists
 EINECS: European Inventory of Existing Commercial Chemical Substances
 ELINCS: European List of Notified Chemical Substances
 CAS: Chemical Abstracts Service (division of the American Chemical Society)
 NFPA: National Fire Protection Association (USA)
 HMIS: Hazardous Materials Identification System (USA)
 LC50: Lethal dose, 50 percent



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Printing date 10/11/2021

Reviewed on 10/11/2021

1 Identification

- · Product identifier Industrial water treatment compound
- · Trade name: BLR 10
- · Article number: WBL10A
- · Details of the supplier of the safety data sheet
- Manufacturer/Supplier: ZEE COMPANY, INC. 4146 South Creek Road Chattanooga, TN 37406
- · Information department: Technical Services: 423-698-1401
- Emergency telephone number: CHEMTREC: 800-424-9300

2 Hazard(s) identification

· Classification of the substance or mixture



Skin Irrit. 2 H315 Causes skin irritation.

- · Label elements
- · GHS label elements
- The product is classified and labeled according to the Globally Harmonized System (GHS). Hazard pictograms



- · Signal word Warning
- · Hazard statements
- Causes skin irritation.
- · Precautionary statements
- Wash thoroughly after handling.
- Wear protective gloves.
- If on skin: Wash with plenty of water.
- Specific treatment (see on this label).
- If skin irritation occurs: Get medical advice/attention.
- Take off contaminated clothing and wash it before reuse.
- · Classification system:
- · NFPA ratings (scale 0 4)



Health = 1 Fire = 0 Reactivity = 0

(Contd. on page 2)

[·]US·

(Contd. of page 1)

Safety Data Sheet acc. to OSHA HCS

Printing date 10/11/2021

Reviewed on 10/11/2021

Trade name: BLR 10

· HMIS-ratings (scale 0 - 4)

HEALTH FIRE

1 Health = 1 D Fire = 0Reactivity = 0 REACTIVITY 0

· Other hazards

Results of PBT and vPvB assessment

- · PBT: Not applicable.
- · vPvB: Not applicable.

3 Composition/information on ingredients

· Chemical characterization: Mixtures

Description: Mixture of the substances listed below with nonhazardous additions.

4 First-aid measures

- · Description of first aid measures
- · General information: Immediately remove any clothing soiled by the product.
- · After inhalation: Remove to fresh air. If symptoms persist consult a doctor.
- · After skin contact:

Remove contaminated clothing and flush area with running water for a minimum of 15 minutes. If irritation persists consult a doctor.

Immediately rinse with water.

· After eye contact:

Rinse opened eye for a minimum of 15 minutes with running water. If symptoms persist, consult a doctor.

· After swallowing:

Immediately contact a doctor or Poison Control Center.

Do not induce vomiting. Rinse mouth out with water, and drink several glasses of water. Never give anything by mouth to an unconscious person.

- Information for doctor:
- · Most important symptoms and effects, both acute and delayed No further relevant information available.
- · Indication of any immediate medical attention and special treatment needed No further relevant information available.

5 Fire-fighting measures

- · Extinguishing media
- Suitable extinguishing agents: Use fire fighting measures that suit the environment.
- Special hazards arising from the substance or mixture No further relevant information available.
- Advice for firefighters
- · Protective equipment: No special measures required.

6 Accidental release measures

- Personal precautions, protective equipment and emergency procedures Not required. · Environmental precautions:
- Do not allow to enter surface or ground water.

(Contd. on page 3)

- US

Printing date 10/11/2021

Reviewed on 10/11/2021

(Contd. of page 2)

Trade name: BLR 10

Do not allow to penetrate the ground/soil.

Dilute with plenty of water.

Do not allow to enter sewers/ surface or ground water.

Methods and material for containment and cleaning up:

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

· Reference to other sections

See Section 7 for information on safe handling.

- See Section 8 for information on personal protection equipment.
- See Section 13 for disposal information.

· Protective Action Criteria for Chemicals

· PAC-1:

All components have the value 61 mg/m³.

PAC-2:

All components have the value 680 mg/m³.

· PAC-3:

All components have the value 1,200 mg/m³.

7 Handling and storage

- · Handling:
- Precautions for safe handling No special precautions are necessary if used correctly.
- · Information about protection against explosions and fires: No special measures required.
- · Conditions for safe storage, including any incompatibilities
- · Storage:
- · Requirements to be met by storerooms and receptacles:

Keep this and all chemicals out of the reach of children.

- Store in a cool, dry, well ventilated area.
- · Information about storage in one common storage facility: Not required.
- · Further information about storage conditions: None.
- · Specific end use(s) No further relevant information available.

8 Exposure controls/personal protection

· Additional information about design of technical systems: No further data; see item 7.

· Control parameters

Components with limit values that require monitoring at the workplace:

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

· Additional information: The lists that were valid during the creation were used as basis.

- · Exposure controls
- · Personal protective equipment:
- · General protective and hygienic measures:
- Keep away from foodstuffs, beverages and feed.

Immediately remove all soiled and contaminated clothing.

Wash hands before breaks and at the end of work.

Avoid contact with the eyes and skin.

· Breathing equipment: Not necessary if room is well-ventilated.

(Contd. on page 4)

(Contd. of page 3)

Safety Data Sheet acc. to OSHA HCS

Printing date 10/11/2021

Reviewed on 10/11/2021

Trade name: BLR 10

· Protection of hands:



Protective gloves

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation. Due to missing tests no recommendation to the glove material can be given for the product/ the preparation/ the chemical mixture.

Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation

· Material of gloves

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

· Penetration time of glove material

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

· Eye protection:



Tightly sealed goggles

· Body protection: Protective work clothing

 Information on basic physical and General Information 	chemical properties
Appearance:	
Form:	Liquid
Color:	Gold
· Odor:	Mild
· Odor threshold:	Not determined.
· pH-value at 20 °C (68 °F):	12.5
· Change in condition	
Melting point/Melting range:	Undetermined.
Boiling point/Boiling range:	Undetermined.
· Flash point:	Not applicable.
· Flammability (solid, gaseous):	Not applicable.
· Decomposition temperature:	Not determined.
· Auto igniting:	Product is not selfigniting.
· Danger of explosion:	Product does not present an explosion hazard.
· Explosion limits:	
Lower:	Not determined.
Upper:	Not determined.

Printing date 10/11/2021

Reviewed on 10/11/2021

Trade name: BLR 10

		(Contd. of page 4		
· Vapor pressure:	Not determined.			
· Density at 20 °C (68 °F):	1.175 g/cm ³ (9.80538 lbs/gal)			
· Relative density	Not determined.			
· Vapor density	Not determined.			
· Evaporation rate	Not determined.			
· Solubility in / Miscibility with				
Water:	Fully miscible.			
· Partition coefficient (n-octanol/wa	ater): Not determined.			
· Viscosity:				
Dynamic:	Not determined.			
Kinematic:	Not determined.			
· Solvent content:				
VOC content:	0.00 %			
	0.0 g/l / 0.00 lb/gal			
· Other information	No further relevant information available.			

10 Stability and reactivity

· Reactivity No further relevant information available.

- · Chemical stability Stable
- · Thermal decomposition / conditions to be avoided:
- No decomposition if used according to specifications.
- · Possibility of hazardous reactions No dangerous reactions known.
- · Conditions to avoid No further relevant information available.
- · Incompatible materials: No further relevant information available.
- · Hazardous decomposition products: No dangerous decomposition products known.

11 Toxicological information

- · Information on toxicological effects
- · Acute toxicity:
- · Primary irritant effect:
- · on the skin: No irritant effect.
- · on the eye: No irritating effect.

· Sensitization: No sensitizing effects known.

· Additional toxicological information:

The product shows the following dangers according to internally approved calculation methods for preparations:

· Carcinogenic categories

· IARC (International Agency for Research on Cancer)

None of the ingredients is listed.

· NTP (National Toxicology Program)

None of the ingredients is listed.

(Contd. on page 6)

- US

Printing date 10/11/2021

Reviewed on 10/11/2021

Trade name: BLR 10

(Contd. of page 5)

· OSHA-Ca (Occupational Safety & Health Administration)

None of the ingredients is listed.

12 Ecological information

· Toxicity

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

· General notes:

Water hazard class 1 (Self-assessment): slightly hazardous for water

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

Rinse off of bigger amounts into drains or the aquatic environment may lead to increased pH-values. A high pH-value harms aquatic organisms. In the dilution of the use-level the pH-value is considerably reduced, so that after the use of the product the aqueous waste, emptied into drains, is only low water-dangerous.

- · Results of PBT and vPvB assessment
- PBT: Not applicable.
- · vPvB: Not applicable.
- · Other adverse effects No further relevant information available.

13 Disposal considerations

- · Waste treatment methods
- · Recommendation:

Must not be disposed of together with household garbage. Do not allow product to reach sewage system.

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

- · Uncleaned packagings:
- Recommendation: Disposal must be made according to official regulations.
- · Recommended cleansing agent: Water, if necessary with cleansing agents.

14 Transport information

- · UN-Number
- · DOT, ADN, IMDG, IATA
- · UN proper shipping name
- · DOT, ADN, IMDG, IATA
- · Transport hazard class(es)
- · DOT, ADR, ADN, IMDG, IATA
- Class

(Contd. on page 7)

us

Printing date 10/11/2021

Reviewed on 10/11/2021

Trade name: BLR 10

		(Contd. of page 6)
· Packing group · DOT, IMDG, IATA	-	
· Environmental hazards:		
Marine pollutant:	No	
· Special precautions for user	Not applicable.	
· Transport in bulk according to Anne	ex II of	
MARPOL73/78 and the IBC Code	Not applicable.	
· UN "Model Regulation":	•	

15 Regulatory information

· Safety, health and environmental regulations/legislation specific for the substance or mixture · Sara

Section 355 (extr	emely hazardou	is substances):
-------------------	----------------	-----------------

None of the ingredients is listed.

· Section 313 (Specific toxic chemical listings):

None of the ingredients is listed.

· TSCA (Toxic Substances Control Act):

All components have the value ACTIVE.

· Hazardous Air Pollutants

None of the ingredients is listed.

· Proposition 65

· Chemicals known to cause cancer:

None of the ingredients is listed.

· Chemicals known to cause reproductive toxicity for females:

None of the ingredients is listed.

· Chemicals known to cause reproductive toxicity for males:

None of the ingredients is listed.

· Chemicals known to cause developmental toxicity:

None of the ingredients is listed.

· Carcinogenic categories

· EPA (Environmental Protection Agency)

None of the ingredients is listed.

· TLV (Threshold Limit Value)

None of the ingredients is listed.

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

None of the ingredients is listed.

· GHS label elements

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

(Contd. on page 8)

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Printing date 10/11/2021

Reviewed on 10/11/2021

Trade name: BLR 10



KOPPH	ERS UTILITY AND INDUSTRIAL PRODUCT Kennedy, Alabama
-	Anti-Degradation Analysis
	Prepared By: H. M. Rollins Company, Inc. P.O. Box 3471 Gulfport, Mississippi 39505 (228) 832-1738
	November 4, 2024

Koppers Utility and Industrial Products (Koppers) purchased the Brown Wood Preserving Facility in Kennedy, AL, on April 1, 2024. While preparing the renewal application for the NPDES storm water discharge permit, Koppers found that expanded product storage areas resulted in additional storm water outfalls not previously included in permitting. These outfalls do not increase the amount of storm water runoff from the facility, but because of the industrial use of these formerly undeveloped tracts, an antidegradation analysis is required.

ADEM Form 311 has been completed to evaluate the alternatives for the new outfalls. Being that the discharge being evaluated is storm water, and that the amount of water being discharged to the environment is not being changed, alternatives to the discharge are few.

The management of storm water discharges is best handled through the use of good engineering, or best management, practices. At a wood preserving facility, these practices include the use of Subpart W drip pads and drippage management contingency plans. Through proper treatment techniques, excess preservative is drawn back into the facility's wood treatment tank system. At the end of the treating process, materials are kept on the drip pads until certified drip-free. This minimizes releases from the materials in storage associated with exposure to storm water. Daily inspections of the treated product storage areas result in the immediate cleanup of the minor drippage that does occur.

In addition to the best management practices utilized in the wood treating process, it must also be noted that Koppers also has transitioned from chlorophenolic treating solutions to newer, non-restricted solutions. This change reduces the potential for off-site impacts due to storm water runoff.

The volume of storm water generated at the site is dependent upon the area of the site and annual rainfall amounts. Koppers cannot control the amount of rainfall, which in this region averages over 50 inches per year. The resulting annual volume of storm water which would need to be managed using form-listed alternatives makes these alternatives not technically or financially feasible. Additionally, as stated on Form 311, storm water is not typically accepted at POTWs. It is therefore the opinion of this engineer that all alternatives outside of best management practices are non-viable, as shown on Form 311.

The primary benefit of the expanded on-site storage is the ability to provide more rapid storm response, which in this area of the country is extremely important. The treating process takes time, so having an inventory sized to allow immediate fulfillment of orders results in more expeditious recovery of critical infrastructure components following a storm. This also translates to an economic benefit to the local community, as increased sales yield increased revenues from taxes levied upon the facility.

Attachment 1 to Supplementary Form ADEM Form 311

Alternatives Analysis

Applicant/Project: KUIP - Kennedy Plant

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

Alternative	Viable	Non-Viable	Comment
1 Land Application		X	Collection of storm water runoff to then land apply is not technically feasible.
2 Pretreatment/Discharge to POTW		X	Storm Water not typically acceptable at POTWs.
3 Relocation of Discharge		X	Relocation of outfall would not change discharge receiving stream
4 Reuse/Recycle		X	Volume of runoff excessive; no reuse/recycle options.
5 Process/Treatment Alternatives		×	Volume of runoff excessive; system size technically infeasible
6 On-site/Sub-surface Disposal		X	Volume of runoff excessive; system size technically infeasible
(other project-specific alternatives considered by the applicant; attach additional sheets if necessary)			
7			
8			
9			111111
Pursuant to ADEM Administrative Code Rule 335-6-304, I certify on behalf of th applicant that I have completed an evalu of the discharge alternatives identified al and reached the conclusions indicated	ne ation bove,	Signature:	Projectional Engineer)

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

ADEM Form 311 3/02