JEFFERY W. KITCHENS ACTING DIRECTOR



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

May 20, 2025

Mr. Rick Clark Chief Operating Officer Alabama State Port Authority P.O. Box 1588 Mobile, AL 36633

RE: Draft Permit McDuffie Coal Terminal NPDES Permit Number AL0042374 Mobile County (097)

Dear Mr. Clark:

Transmitted herein is a draft of the above referenced permit. Please review the enclosed draft permit carefully. If previously permitted, the draft may contain additions/revisions to the language in your current permit. Please submit any comments on the draft permit to the Department within 30 days from the date of receipt of this letter.

Since the Department has made a tentative decision to resissue the above referenced permit, ADEM Admin. Code r. 335-6-6-.21 requires a public notice of the draft permit followed by a period of at least 30 days for public comment before the permit can be issued. The United States Environmental Protection Agency will also receive the draft permit for review during the 30-day public comment period.

Any mining, processing, construction, land disturbance, or other regulated activity proposed to be authorized by this draft permit is prohibited prior to the effective date of the formal permit. Any mining or processing activity within the drainage basin associated with each permitted outfall which is conducted prior to Departmental receipt of certification from a professional engineer licensed to practice in the State of Alabama, that the Pollution Abatement/Prevention Plan was implemented according to the design plan, or notification from the Alabama Surface Mining Commission that the sediment control structures have been certified, is prohibited.

This permit requires Discharge Monitoring Reports (DMR) to be submitted utilizing the Department's web-based electronic reporting system. Please read Part I.D of the permit carefully and visit https://aepacs.adem.alabama.gov/nviro/ncore/external/home.

Should you have any questions concerning this matter, please contact Jasmine White at (334) 270-5622 or jasmine.white@adem.alabama.gov.

Sincerely,

William D. McClimans, Chief Mining and Natural Resource Section Stormwater Management Branch Water Division

WDM/jlw

cc.

File: DPER/677

Jasmine White, ADEM Environmental Protection Agency Region IV Alabama Department of Conservation and Natural Resources U.S. Fish and Wildlife Service Alabama Historical Commission Advisory Council on Historic Preservation U.S. Army Corps of Engineers Mobile District U.S. Army Corps of Engineers Nashville District



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)





NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE:	Alabama State Port Authority PO Box 1588 Mobile, AL 36633
FACILITY LOCATION:	McDuffie Coal Terminal 1768 Yeend Loop Mobile, AL 36603 Mobile County T4S, R1W, Sections 25, 35, & 36
PERMIT NUMBER:	AL0042374

DSN & RECEIVING STREAM: 001 - 1 Mobile Bay

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

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:



Alabama Department of Environmental Management

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT

Transportation and Storage of Coal and Associated Areas

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PART I DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

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 each point source identified on Page 1 of this Permit and described more fully in the Permittee's application, if the outfalls have been constructed and certified. Discharges shall be limited and monitored by the Permittee as specified below:

Parameter		Discharge Limitation		Monitoring Requirements			
i arameter	Daily Minimum	Monthly Average	Daily Maximum	Sample Typc	Measurement Frequency ¹		
Specific Conductance 00095		Report µS/cm	Report µS/cm	Grab	2/Month		
Sulfate (As S) 00154		Report mg/L	Report mg/L	Grab	2/Month		
рН 00400	6.0 s.u.		9.0 s.u.	Grab	2/Month		
pH ² 00400	6.0 s.u.		10.5 s.u.	Grab	2/Month		
Solids, Total Suspended 00530		35.0 mg/L	70.0 mg/L	Grab	2/Month		
Iron, Total (As Fe) 01045		3.0 mg/L	6.0 mg/L	Grab	2/Month		
Manganese, Total (As Mn) ³ 01055		2.0 mg/L	4.0 mg/L	Grab	2/Month		
Flow, In Conduit or Thru Treatment Plant ⁴ 50050		Report MGD	Report MGD	Instantaneous	2/Month		
Solids, Total Dissolved (TDS) 70296		Report mg/L	Report mg/L	Grab	1/Quarter		

B. REQUIREMENTS TO ACTIVATE A PROPOSED MINING OUTFALL

- 1. Discharge from any point source identified on Page 1 of this Permit which is a proposed outfall is not authorized by this Permit until the outfall has been constructed and certification received by the Department from a professional engineer, registered in the State of Alabama, certifying that such facility has been constructed according to good engineering practices and in accordance with the Pollution Abatement and/or Prevention (PAP) Plan.
- 2. Certification required by Part I.B.1. shall be submitted on a completed ADEM Form 432. The certification shall include the latitude and longitude of the constructed and certified outfall.

¹ See Part I.C.2. for further measurement frequency requirements.

² See Part IV.B. for pH Exemption Discharge Limitations.

³ See Part IV.C. for Manganese Exemption Discharge Limitations.

⁴ Flow must be determined at the time of sample collection by direct measurement, calculation, or other method acceptable to the Department.

- 3. Discharge monitoring and Discharge Monitoring Report (DMR) reporting requirements described in Part I.C. of this Permit do not apply to point sources that have not been constructed and certified.
- 4. Upon submittal of the certification required by Part I.B.1. to the Department, all monitoring and DMR submittal requirements shall apply to the constructed and certified outfall.

C. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS

1. Sampling Schedule and Frequency

- a. The Permittee shall collect at least one grab sample of the discharge to surface waters from each constructed and certified point source identified on Page 1 of this Permit and described more fully in the Permittee's application twice per month at a rate of at least every other week if a discharge occurs at any time during the two week period, but need not collect more than two samples per calendar month. Each sample collected shall be analyzed for each parameter specified in Part I.A. of this Permit.
- b. If the final effluent is pumped in order to discharge (e.g. from incised ponds, old highwall cuts, old pit areas or depressions, etc.), the Permittee shall collect at least one grab sample of the discharge from each point source identified on Page I of this Permit and described more fully in the Permittee's application each quarterly (three month) monitoring period if a discharge occurs at any time during the quarterly monitoring period which results from direct pumped drainage. Each sample collected shall be analyzed for each parameter specified in Part I.A. of this Permit.
- c. The Permittee may increase the frequency of sampling listed in Parts I.C.1.a and I.C.1.b; however, all sampling results must be reported to the Department and included in any calculated results submitted to the Department in accordance with this Permit.

2. Measurement Frequency

Measurement frequency requirements found in Part I.A. shall mean:

- a. A measurement frequency of one day per week shall mean sample collection on any day of discharge which occurs every calendar week.
- b. A measurement frequency of two days per month shall mean sample collection on any day of discharge which occurs every other week, but need not exceed two sample days per month.
- c. A measurement frequency of one day per month shall mean sample collection on any day of discharge which occurs during each calendar month.
- d. A measurement frequency of one day per quarter shall mean sample collection on any day of discharge which occurs during each calendar quarter.
- e. A measurement frequency of one day per six months shall mean sample collection on any day of discharge which occurs during the period of January through June and during the period of July through December.
- f. A measurement frequency of one day per year shall mean sample collection on any day of discharge which occurs during each calendar year.
- 3. Monitoring Schedule

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The Permittee shall conduct the monitoring required by Part I.A. in accordance with the following schedule:

- a. 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. More frequently than monthly and monthly monitoring may be done anytime during the month, unless restricted elsewhere in this Permit, but the results should be reported on the last Discharge Monitoring Report (DMR) due for the quarter (i.e., with the March, June, September, and December DMRs).
- b. 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 the results should be reported on the last DMR due for the quarter (i.e., with the March, June, September, and December DMRs).
- c. 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 semiannual calendar 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 reported on the last DMR due for the month of the semiannual period (i.e., with the June and December DMRs).
- d. 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 reported on the December DMR.

4. Sampling Location

Unless restricted elsewhere in this Permit, samples collected to comply with the monitoring requirements specified in Part I.A. shall be collected at the nearest accessible location just prior to discharge and after final treatment, or at an alternate location approved in writing by the Department.

5. Representative Sampling

Sample collection and measurement actions 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.

6. 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, guidelines

published pursuant to Section 304(h) of the FWPCA, 33 U.S.C. Section 1314(h), and ADEM Standard Operating Procedures. If more than one method for analysis of a substance is approved for use, a method having a minimum level lower than the permit limit shall be used. If the minimum level of all methods is higher than the permit limit, the method having the lowest minimum level shall be used and a report of less than the minimum level shall be reported as zero and will constitute compliance, however should EPA approve a method with a lower minimum level during the term of this Permit the Permittee shall use the newly approved method.

b. For pollutant 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 identified in Parts I.C.6.a. and b. 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.

7. 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 or measurements;
- 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.

8. Routine Inspection by Permittee

a. The Permittee shall inspect all point sources identified on Page 1 of this Permit and described more fully in the Permittee's application and all treatment or control facilities or

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systems used by the Permittee to achieve compliance with the terms and conditions of this Permit at least as often as the applicable sampling frequency specified in Part I.C.1 of this Permit.

- b. The Permittee shall maintain a written log for each point source identified on Page 1 of this Permit and described more fully in the Permittee's application in which the Permittee shall record the following information:
 - (1) The date and time the point source and any associated treatment or control facilities or systems were inspected by the Permittee;
 - (2) Whether there was a discharge from the point source at the time of inspection by the Permittee;
 - (3) Whether a sample of the discharge from the point source was collected at the time of inspection by the Permittee;
 - (4) Whether all associated treatment or control facilities or systems appeared to be in good working order and operating as efficiently as possible, and if not, a description of the problems or deficiencies; and
 - (5) The name and signature of the person performing the inspection of the point source and associated treatment or control facilities or systems.

9. Records Retention and Production

- a. 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 this 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 (3) years from the date of the sample collection, 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, AEMA, 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, the Permittee shall provide the Director with a copy of any record required to be retained by this paragraph. Copies of these records should not be submitted unless requested.
- b. All records required to be kept for a period of three (3) years shall be kept at the permitted facility or an alternate location approved by the Department in writing and shall be available for inspection.

10. 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.

D. DISCHARGE REPORTING REQUIREMENTS

1. Requirements for Reporting of Monitoring

- a. Monitoring results obtained during the previous three (3) months shall be summarized for each month on a Discharge Monitoring Report (DMR) Form approved by the Department, and submitted to the Department so that it is received by the Director no later than the 28th day of the month following the quarterly reporting period (i.e., on the 28th day of January, April, July, and October of each year).
- b. The Department utilizes a web-based electronic reporting system for submittal of DMRs. Except as allowed by Part I.D.1.c. or d., the Permittee shall submit all DMRs required by Part I.D.1.a. by utilizing the Department's current electronic reporting system. The Department's current reporting system, Alabama Environmental Permitting and Compliance System (AEPACS), can be found online at https://aepacs.adem.alabama.gov/nviro/ncore/external/home.
- c. If the electronic reporting system is down (i.e. electronic submittal of DMR data is unable to be completed due to technical problems originating with the Department's system; this could include entry/submittal issues with an entire set of DMRs or individual parameters), permittees are not relieved of their obligation to submit DMR data to the Department by the required submittal date. However, if the electronic reporting system is down on the 28th day of the month or is down for an extended period of time as determined by the Department when a DMR is required to be submitted, the facility 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 five calendar days of the electronic reporting system resuming operation, the Permittee shall enter the data into the reporting system unless an alternate timeframe is approved by the Department. An attachment should be included with the electronic DMR submittal verifying the original submittal date (date of the fax, copy of date e-mail, or hand-delivery stamped date).
- d. 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 request is effective. The Permittee shall submit the approved electronic reporting waiver request is effective. The Permittee shall submit the Department-approved DMR forms to the address listed in Part I.D.1.i.
- e. If the Permittee, using approved analytical methods as specified in Part 1.C.6., monitors any discharge from a point source identified on Page 1 of this Permit and describe more fully in the Permittee's application 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 Form, and the increased frequency shall be indicated on the DMR Form.
- f. In the event no discharge from a point source identified on Page 1 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 Form.
- g. Each DMR Form submitted by the Permittee to the Department in accordance with Part I.D.1, must be legible and bear an original signature or electronic signature. Photo and

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electronic copies of the signature are not acceptable and shall not satisfy the reporting requirements of this Permit.

h. All reports and forms required to be submitted by this Permit, the AWPCA, and the Department's rules and regulations, shall be signed by a "responsible official" of the Permittee as defined in ADEM Admin. Code r. 335-6-6-.09 or a "duly authorized representative" of such official as defined in ADEM Admin. Code r. 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 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. All DMRs, reports, and forms required to be submitted by this Permit, the AWPCA and the Department's rules and regulations, shall be submitted through the Department's electronic reporting system, AEPACS, or, if in hardcopy, shall be addressed to:

Alabama Department of Environmental Management Water Division, Mining and Natural Resource Section Post Office Box 301463 Montgomery, Alabama 36130-1463

Certified and Registered Mail shall be addressed to:

Alabama Department of Environmental Management Water Division, Mining and Natural Resource Section 1400 Coliseum Boulevard Montgomery, Alabama 36110-2059

- j. Unless authorized in writing by the Department, approved reporting forms required by this Permit or the Department are not to be altered, and if copied or reproduced, must be consistent in format and identical in content to the ADEM approved form. Unauthorized alteration, falsification, or use of incorrectly reproduced forms constitutes noncompliance with the requirements of this Permit and may significantly delay processing of any request, result in denial of the request, result in permit termination, revocation, suspension, modification, or denial of a permit renewal application, or result in other enforcement action.
- k. If this Perinit is a reissuance, 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.D.1.

2. Noncompliance Notification

- a. The Permittee must notify the Department if, for any reason, the Permittee's discharge:
 - (1) Potentially threatens human health or welfare;

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- (2) Potentially threatens fish or aquatic life;
- (3) Causes an in-stream water quality criterion to be exceeded;
- (4) Does not comply with an applicable toxic pollutant effluent standard or prohibition established under Section 307(a) of the FWPCA, 33 U.S.C. §1317(a);
- (5) Contains a quantity of a hazardous substance which has been determined may be harmful to the public health or welfare under Section 311(b)(4) of the FWPCA, 33 U.S.C. §1321(b)(4); or
- (6) Exceeds any discharge limitation for an effluent parameter as a result of an unanticipated bypass or upset.

The Permittee shall orally or electronically report any of the above occurrences, describing the circumstances and potential effects 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 or electronic report, the Permittee shall submit to the Director a written report as provided in Part I.D.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 a written report to the Director as provided in Part I.D.2.c. This report must be submitted with the next Discharge Monitoring Report required to be submitted by Part I.D.1. of this Permit after becoming aware of the occurrence of such noncompliance.
- c. An electronic Noncompliance Notification Form in a Department-approved format must be submitted to the Director in accordance with Parts I.D.2.a. and b. The completed form must document 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.
- 3. Reduction, Suspension, or Termination of Monitoring and/or Reporting
 - a. The Director may, with respect to any point source identified on Page 1 of this Permit and described more fully in the Permittee's application, authorize the Permittee to reduce, suspend, or terminate the monitoring and/or reporting required by this Permit upon the submission of a written request for such reduction, suspension, or termination by the Permittee provided:
 - (1) All mining, processing, or disturbance in the drainage basin(s) associated with the discharge has ceased and site access is adequately restricted or controlled to preclude unpermitted and unauthorized mining, processing, transportation, or associated operations/activity;
 - (2) Permanent, perennial vegetation has been re-established on all areas mined or disturbed for at least one year since mining has ceased in the drainage basin(s) associated with the surface discharge, or all areas have been permanently graded

such that all drainage is directed back into the mined pit to preclude all surface discharges;

- (3) Unless waived in writing by the Department, the Permittee has been granted, in writing, a 100% Bond Release, if applicable, by the Alabama Department of Industrial Relations and, if applicable, by the Surface Mining Commission for all areas mined or disturbed in the drainage basin(s) associated with the discharge;
- (4) Unless waived in writing by the Department, the Permittee has submitted inspection reports prepared and certified by a Professional Engineer (PE) registered in the State of Alabama or a qualified professional under the PE's direction which certify that the facility has been fully reclaimed or that water quality remediation has been achieved. The first inspection must be conducted approximately one year prior to and the second inspection must be conducted within thirty days of the Permittee's request for termination of monitoring and reporting requirements;
- (5) All surface effects of the mining activity such as fuel or chemical tanks, preparation plants or equipment, old tools or equipment, junk or debris, etc., must be removed and disposed of according to applicable state and federal regulations;
- (6) The Permittee's request for termination of monitoring and reporting requirements contained in this Permit has been supported by monitoring data covering a period of at least six consecutive months or such longer period as is necessary to assure that the data reflect discharges occurring during varying seasonal climatological conditions;
- (7) The Permittee has stated in its request that the samples collected and reported in the monitoring data submitted in support of the Permittee's request for monitoring termination or suspension are representative of the discharge and were collected in accordance with all Permit terms and conditions respecting sampling times (e.g., rainfall events) and methods and were analyzed in accordance with all Permit terms and conditions respecting analytical methods and procedures;
- (8) The Permittee has certified that during the entire period covered by the monitoring data submitted, no chemical treatment of the discharge was provided;
- (9) The Permittee's request has included the certification required by Part I.D.1.e. of this Permit; and
- (10) The Permittee has certified to the Director in writing as part of the request, its compliance with (1) through (9) above.
- b. It remains the responsibility of the Permittee to comply with the monitoring and reporting requirements of this Permit until written authorization to reduce, suspend, or terminate such monitoring and/or reporting is received by the Permittee from the Director.

E. 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 on Page 1 of this Permit and described more fully in the Permittee's application have permanently ceased.

- 3. Updating Information
 - a. The Permittee shall inform the Director of any change in the Permittee's mailing address or telephone number or in the Permittee's designation of a facility contact or officer(s) having the authority and responsibility to prevent and abate violations of the AWPCA, the AEMA, the Department's rules and regulations, and the terms and conditions of this Permit, in writing, no later than ten (10) days after such change. Upon request of the Director, 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
 - a. The Permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, suspending, terminating, or revoking and reissuing this Permit, in whole or in part, or to determine compliance with this Permit. The Permittee shall also furnish to the Director upon request, copies of records required to be maintained by this Permit.
 - b. The Permittee shall furnish to the Director upon request, within a reasonable time, available information (name, phone number, address, and site location) which identifies offsite sources of material or natural resources (mineral, ore, or other material such as iron, coal, coke, dirt, chert, shale, clay, sand, gravel, bauxite, rock, stone, etc.) used in its operation or stored at the facility.

F. SCHEDULE OF COMPLIANCE

The Permittee shall achieve compliance with the discharge limitations specified in Part I.A. of this Permit in accordance with the following schedule:

Compliance must be achieved by the effective date of this Permit.

PART II OTHER REQUIREMENTS, RESPONSIBILITIES, AND DUTIES

A. OPERATIONAL AND MANAGEMENT REQUIREMENTS

1. Facilities Operation and Management

The Permittee shall at all times 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 this 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 this Permit.

2. Pollution Abatement and/or Prevention Plan

- a. The Pollution Abatement and/or Prevention (PAP) Plan shall be prepared and certified by a registered Professional Engineer (PE), licensed to practice in the State of Alabama, and shall include at a minimum:
 - (1) The information indicated in ADEM Admin Code r. 335-6-9-.03 and ADEM Admin. Code ch. 335-6-9 and its Appendices A and B;
 - (2) A description of methods which will be implemented to prevent offsite vehicle tracking onto roadways and/or into ditches at the entrances and/or exits of the Permittee's operations;
 - (3) A description of setbacks from waters of the State in units of linear feet on the horizontal plane; a description of the methods taken to visibly delineate setbacks from waters of the State; and a description of any other actions taken to prevent encroachment upon setbacks;
 - (4) A description of the methods used to delineate the boundaries of coverage under this Permit such that the boundaries are readily visible during the life of the operation;
 - (5) A description of any other Best Management Practices (BMPs) which will be implemented to provide control of all nonpoint source pollution that is or may be associated with the Permittee's operations;
- b. The PAP Plan shall become a part of this Permit and all requirements of the PAP Plan shall become requirements of this Permit pursuant to ADEM Admin Code r. 335-6-9-.05(2). The PAP Plan shall be amended if the Department determines that the existing sediment control measures, erosion control measures, or other site management practices are ineffective or do not meet the requirements of this Permit.
- c. For existing sources, the PAP Plan shall be updated to include all requirements of this section within 180 days of the effective date of this permit. New sources shall submit the PAP plan with the NPDES Individual Permit application prior to coverage under this Permit.

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3. Best Management Practices (BMPs)

- a. Unless otherwise authorized in writing by the Director, the Permittee shall provide a means of subsurface withdrawal for any discharge from each point source identified on Page 1 of this Permit and described more fully in the Permittee's application. Notwithstanding the above provision, a means of subsurface withdrawal need not be provided for any discharge caused by a 24-hour precipitation event greater than a 10-year, 24-hour precipitation event.
- b. Dilution water shall not be added to achieve compliance with discharge limitations except when the Director has granted prior written authorization for dilution to meet water quality requirements.
- c. The Permittee shall minimize the contact of water with overburden, including but not limited to stabilizing disturbed areas through grading, diverting runoff, achieving quick growing stands of temporary vegetation, sealing acid-forming and toxic-forming materials, and maximizing placement of waste materials in back-fill areas.
- d. The Permittee shall prepare, submit to the Department for approval, and implement a Best Management Practices (BMPs) Plan for containment of any or all process liquids or solids, in a manner such that these materials do not present a potential for discharge, if so required by the Director. 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.
- e. Spill Prevention, Control, and Management

The Permittee shall prepare, implement, and maintain a Spill Prevention, Control and Countermeasures (SPCC) Plan acceptable to the Department that is prepared and certified by a Professional Engineer (PE), registered in the State of Alabama, for all onsite petroleum product or other pollutant storage tanks or containers as provided by ADEM Admin. Code r. 335-6-6-.08(j)5. The Plan shall describe and the Permittee shall implement appropriate structural and/or non-structural spill prevention, control, and/or management pursuant to ADEM Admin. Code r. 335-6-6-.12 (r) sufficient to prevent any spills of pollutants from entering a ground or surface water of the State or a publicly or privately owned treatment works. The Plan shall include at a minimum, the engineering requirements provided in 40 C.F.R. §§112.1. 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. Such containment systems shall be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided. The Plan shall list any materials which the Permittee may utilize to contain and to absorb fuel and chemical spills and leaks. The Permittee shall maintain sufficient amounts of such materials onsite or have sufficient amounts of such materials readily available to contain and/or absorb fuel and chemical spills and leaks. Soil contaminated by chemical spills, oil spills, etc., must be immediately cleaned up or be removed and disposed of in a manner consistent with all State and federal regulations.

- f. All surface drainage and storm water runoff which originate within or enters the Permittee's premises and which contains any pollutants or other wastes shall be discharged, if at all, from a point source identified on Page 1 of this Permit and described more fully in the Permittee's application.
- g. The Permittee shall take all reasonable precautions to prevent any surface drainage or storm water runoff which originates outside the Permittee's premises and which contains any pollutants or other wastes from entering the Permittee's premises. At no time shall the Permittee discharge any such surface drainage or storm water runoff which enters the Permittee's premises if, either alone or in combination with the Permittee's effluent, the

discharge would exceed any applicable discharge limitation specified in Part I.A. of this Permit.

4. Biocide Additives

- a. The Permittee shall notify the Director in writing not later than sixty (60) days prior to instituting the use of any biocide corrosion inhibitor or chemical additive in any cooling or boiler system(s) regulated by this Permit. Notification is not 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:
 - (a) Name and general composition of biocide or chemical;
 - (b) 96-hour median tolerance limit data for organisms representative of the biota of the water(s) which the discharge(s) enter(s);
 - (c) Quantities to be used;
 - (d) Frequencies of use;
 - (e) Proposed discharge concentrations; and
 - (f) EPA registration number, if applicable.
- b. The use of any biocide or chemical additive containing tributyl tin, tributyl tin oxide, zinc, chromium, or related compounds in any cooling or boiler system(s) regulated by the Permit 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 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.
- 5. Facility Identification

The Permittee shall clearly display prior to commencement of any regulated activity and until permit coverage is properly terminated, the name of the Permittee, entire NPDES permit number, facility or site name, and other descriptive information deemed appropriate by the Permittee at an easily accessible location(s) to adequately identify the site, unless approved otherwise in writing by the Department. The Permittee shall repair or replace the sign(s) as necessary upon becoming aware that the identification is missing or is unreadable due to age, vandalism, theft, weather, or other reason.

6. Removed Substances

Solids, sludges, filter backwash, or any other pollutants or other wastes removed in the course of treatment or control of wastewaters shall be disposed of in a manner that complies with all applicable Department rules and regulations.

7. Loss or Failure of Treatment Facilities

Upon the loss or failure of any treatment facility, 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 Part I.A. of this Permit or any other terms or conditions of this Permit, cease, reduce, or otherwise control production and/or discharges until treatment is restored.

8. Duty to Mitigate

The Permittee shall promptly take all reasonable steps to minimize or prevent any violation of this Permit or to mitigate and minimize any adverse impact to waters resulting from noncompliance with any discharge limitation specified in Part I.A. of this Permit, including such accelerated or additional monitoring of the discharge and/or the receiving waterbody as is necessary to determine the nature and impact of the noncomplying discharge.

B. BYPASS AND UPSET

- 1. Bypass
 - a. Any bypass is prohibited except as provided in Parts II.B.1.b. and c.
 - b. A bypass is not prohibited if:
 - (1) It does not cause any applicable discharge limitation specified in Part I.A. of this Permit to be exceeded;
 - (2) The discharge resulting from such bypass enters the same receiving water as the discharge from the permitted outfall;
 - (3) It is necessary for essential maintenance of a treatment or control facility or system to assure efficient operation of such facility or system; and
 - (4) The Permittee monitors the discharge resulting from such bypass at a frequency, at least daily, sufficient to prove compliance with the discharge limitations specified in Part I.A. of this Permit.
 - c. A bypass is not prohibited and need not meet the discharge limitations specified in Part 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 the Permittee could have installed adequate backup equipment 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, if possible, prior to the anticipated bypass or within 24 hours of an unanticipated bypass, the Permittee is granted such authorization, and

Permittee complies with any conditions imposed by the Director to minimize any adverse impact to waters resulting from the bypass.

d. The Permittee has the burden of establishing that each of the conditions of Parts II.B.1.b. or c. have been met to qualify for an exception to the general prohibition against bypassing contained in Part II.B.1.a. and an exemption, where applicable, from the discharge limitations specified in Part I.A. of this Permit.

2. Upset

- a. The Permittee may seek to demonstrate that noncompliance with technology-based effluent limits occurred as a result of an upset if the conditions of Part II.B.2.b are met and if the Permittee complies with the conditions provided in Part II.B.2.c.
- b. If the Permittee wishes to establish the affirmative defense of an upset for technologybased effluent limit noncompliance, the Permittee must demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the Permittee can identify the specific cause(s) of the upset;
 - (2) The wastewater treatment facility was at the time being properly operated in accordance with Part II.B.d.
 - (3) The Permittee submitted notice of the noncompliance during the upset as required by Part II.B.2.c; and
 - (4) The Permittee complied with any remedial measures required under Part II.A.7. of this Permit.
- c. If the Permittee wishes to establish the affirmative defense of an upset for technologybased effluent limit noncompliance, the Permittee shall:
 - (1) No later than 24-hours after becoming aware of the occurrence of the upset, orally report the occurrence and circumstances of the upset to the Director in accordance with Part I.G.2.; and
 - (2) No later than five (5) days after becoming aware of the occurrence of the upset, furnish the Director with evidence, including properly signed, contemporaneous operating logs, design drawings, construction certification, maintenance records, weir flow measurements, dated photographs, rain gauge measurements, 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 treatment 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 to waters resulting from the upset.
- d. A discharge which is an overflow from a treatment facility or system, or an excess discharge from a point source associated with a treatment facility or system and which

results from a 24-hour precipitation event larger than a 10-year, 24-hour precipitation event is not eligible to be considered as a result of an upset unless:

- (1) The treatment facility or system is designed, constructed, and maintained to contain the maximum volume of wastewater which would be generated by the facility during a 24-hour period without an increase in volume from precipitation and the maximum volume of wastewater resulting from a 10-year, 24-hour precipitation event or to treat the maximum flow associated with these volumes. In computing the maximum volume of wastewater which would result from a 10-year, 24-hour precipitation event, the volume which would result from all areas contributing runoff to the individual treatment facility must be included (i.e., all runoff that is not diverted from the mining area and runoff which is not diverted from the preparation plant area); and
- (2) The Permittee takes all reasonable steps to maintain treatment of the wastewater and minimize the amount of overflow or excess discharge.
- e. The Permittee has the burden of proof in defense of any enforcement action as a result of noncompliance of technology-based effluent limits the Permittee proposes to attribute to an upset.

C. PERMIT CONDITIONS AND RESTRICTIONS

1. Prohibition against Discharge from Facilities Not Certified

- a. Notwithstanding any other provisions of this Permit, if the permitted facility has not obtained or is not required to obtain a permit from the Alabama Surface Mining Commission, any discharge(s) from any point or nonpoint source(s) from the permitted facility which was not certified to the Department on a form approved by the Department by a professional engineer, registered in the State of Alabama, as being designed, constructed, and in accordance with plans and specifications reviewed by the Department is prohibited; or
- b. Notwithstanding any other provisions of this Permit, if the permitted facility has obtained or is required to obtain a permit from the Alabama Surface Mining Commission, any discharge(s) from any point or nonpoint source(s) from the permitted facility which is associated with a treatment facility which was not constructed and certified to the Alabama Surface Mining Commission pursuant to applicable provisions of said Commission's regulations, is prohibited until the Permittee submits to the Alabama Surface Mining Commission, certification by a professional engineer, registered in the State of Alabama, certifying that such facility has been constructed in accordance with plans and specifications approved by the Alabama Surface Mining Commission. This requirement shall not apply to pumped discharges from the underground works of underground coal mines where no surface structure is required by the Alabama Surface Mining Commission, provided the Department is notified in writing of the completion or installation of such facilities, and the pumped discharges will meet permit effluent limits without treatment.
- 2. Permit Modification, Suspension, Termination, and Revocation
 - a. This Permit may be modified, suspended, terminated, or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:
 - (1) The violation of any term or condition of this Permit;

- (2) The obtaining of this Permit by misrepresentation or the failure to disclose fully all relevant facts;
- (3) The submission of materially false or inaccurate statements or information in the permit application or reports required by the Permit;
- (4) The need for a change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge;
- (5) The existence of any typographical or clerical errors or of any errors in the calculation of discharge limitations;
- (6) The existence of 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;
- (7) The threat of the Permittee's discharge on human health or welfare; or
- (8) Any other cause allowed by ADEM Admin. Code ch. 335-6-6.
- b. The filing of a request by the Permittee for modification, suspension, termination, or revocation and reissuance of this Permit, in whole or in part, does not stay any Permit term or condition of this Permit.

3. Automatic Expiration of Permits for New or Increased Discharges

- a. Except as provided by ADEM Admin. Code r. 335-6-6-.02(h) and 335-6-6-.05, if this Permit was issued for a new discharger or new source, it shall expire eighteen months after the issuance date if construction has not begun during that eighteen month period.
- b. Except as provided by ADEM Admin. Code r. 335-6-6-.02(h) and 335-6-6-.05, if any portion of this Permit was issued or modified to authorize the discharge of increased quantities of pollutants to accommodate the modification of an existing facility, that portion of this Permit shall expire eighteen months after this Permit's issuance if construction of the modification has not begun within eighteen month period.
- c. Construction has begun when the owner or operator has:
 - (1) Begun, or caused to begin as part of a continuous on-site construction program:
 - (i) Any placement, assembly, or installation of facilities or equipment; or
 - 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
 - (2) 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.

d. The automatic expiration of this Permit for new or increased discharges if construction has not begun within the eighteen month period after the issuance of this Permit may be tolled by administrative or judicial stay.

4. 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 this 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.

5. Groundwater

Unless authorized on page 1 of this Permit, this Permit does not authorize any discharge 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.

6. 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. **RESPONSIBILITIES**

1. Duty to Comply

- a. The Permittee must comply with all terms and conditions of this Permit. Any permit noncompliance constitutes a violation of the AWPCA, AEMA, 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 Permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the FWPCA for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if this Permit has not yet been modified to incorporate the effluent standard, prohibition or requirement.
- c. For any violation(s) of this Permit, the Permittee is subject to a civil penalty as authorized by the AWPCA, the AEMA, the FWPCA, and <u>Code of Alabama</u> 1975, §§22-22A-1 <u>et.</u> <u>seq.</u>, as amended, and/or a criminal penalty as authorized by <u>Code of Alabama</u> 1975, §22-22-1 <u>et. seq.</u>, as amended.

- d. The necessity to halt or reduce production or other activities in order to maintain compliance with the conditions of this Permit shall not be a defense for a Permittee in an enforcement action.
- e. Nothing in this Permit shall be construed to preclude or 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.
- f. 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.
- g. 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.
- 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, increase the quantity of a discharged pollutant, or that could result in an additional discharge point. This requirement also applies to pollutants 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 knows or has reason to believe that it has begun or expects to begin to discharge any pollutant listed as a toxic pollutant pursuant to Section 307(a) of the FWPCA, 33 U.S.C. §1317(a), any substance designated as a hazardous substance pursuant to Section 311(b)(2) of the FWPCA, 33 U.S.C. §1321(b)(2), any waste listed as a hazardous waste pursuant to <u>Code of Alabama</u> 1975, §22-30-10, or any other pollutants or other wastes which is not subject to any discharge limitations specified in Part I.A. of this Permit and was not reported in the Permittee's application, was reported in the Permittee's to begin to be discharged, or has reason to believe has begun to be discharged.
- 3. Compliance with Toxic or Other Pollutant Effluent 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 Sections 301(b)(2)(C),(D),(E) and (F) of the FWPCA, 33 U.S.C. §1311(b)(2)(C),(D),(E), and (F); 304(b)(2) of the FWPCA, 33 U.S.C. §1314(b)(2); or 307(a) of the FWPCA, 33 U.S.C. §1317(a), for a toxic or other pollutant discharged by the Permittee, and such standard or prohibition is more stringent than any discharge limitation on the pollutant specified in Part I.A. of this Permit or controls a pollutant not limited in Part I.A. of this Permit, this Permit shall be modified to conform to the toxic or other 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 or other pollutant effluent standard or prohibition before the effective date of such standard or prohibition, the authorization to discharge in this Permit shall be void to the extent that any discharge limitation on such pollutant in Part I.A. of this Permit exceeds or is inconsistent with the established toxic or other pollutant effluent standard or prohibition.

4. Compliance with Water Quality Standards and Other Provisions

- a. 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 will assure compliance with applicable water quality standards. However, this Permit does not relieve the Permittee from compliance with applicable State water quality standards established in ADEM Admin. Code ch. 335-6-10, and does not preclude the Department from taking action as appropriate to address the potential for contravention of applicable State water quality standards which could result from discharges of pollutants from the permitted facility.
- b. Compliance with Permit terms and conditions notwithstanding, if the Permittee's discharge(s) from point source(s) identified on Page 1 of this Permit cause(s) or contribute(s) to a condition in contravention of State water quality standards, the Department may require abatement action to be taken by the Permittee, modify the Permit pursuant to the Department's rules and regulations, or both.
- c. If the Department determines, on the basis of a notice provided pursuant to Part II.C.2. of 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 noticed act until the Permit has been modified.

5. Compliance with Statutes and Rules

- a. This Permit has been issued under ADEM Admin. Code div. 335-6. All provisions of this division, that are applicable to this Permit, are hereby made a part of this Permit. A copy of this division may be obtained for a small charge from the Office of General Counsel, Alabama Department of Environmental Management, 1400 Coliseum Blvd., Montgomery, AL 36110-2059.
- 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.

6. Right of Entry and Inspection

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

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

7. 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 with the Department a complete permit application for reissuance of this Permit at least 180 days prior to its expiration. Applications must be submitted electronically via the Department's current electronic permitting system. The Department's current online permitting system, Alabama Environmental Permitting System (AEPACS), can found and Compliance be online at https://aepacs.adem.alabama.gov/nviro/ncore/external/home.
- b. If the Permittee does not desire to continue the discharge(s) allowed by this Permit, the Permittee shall notify the Department at least 180 days prior to expiration of this Permit of the Permittee's intention not to request reissuance of this Permit. This notification must include the information required in Part I.D.4.a. and be signed by an individual meeting the signatory requirements for a permit application as set forth in ADEM Admin. Code r. 335-6-6-.09.
- c. Failure of the Permittee to submit to the Department a complete application for reissuance of this Permit at least 180 days prior to the expiration date of this Permit will void the automatic continuation of this Permit provided by ADEM Admin. Code r. 335-6-6-.06; and should this Permit not be reissued for any reason, any discharge after the expiration of this Permit will be an unpermitted discharge.

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PART III ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS

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 this Permit shall, upon conviction, be subject to penalties and/or imprisonment as provided by the AWPCA and/or the AEMA.

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 punished as provided by applicable State and Federal law.

3. Permit Enforcement

This NPDES Permit is a Permit for the purpose of the AWPCA, the AEMA, and the FWPCA, and as such all terms, conditions, or limitations of this Permit are enforceable under State and Federal law.

4. Relief From Liability

Except as provided in Part II.B.1. (Bypass) and Part II.B.2. (Upset), nothing in this Permit shall be construed to relieve the Permittee of civil or criminal liability under the AWPCA, AEMA, 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 to under Section 311 of the FWPCA, 33 U.S.C. §1321.

C. AVAILABILITY OF REPORTS

Except for data determined to be confidential under <u>Code of Alabama</u> 1975, §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. Knowingly making any false statement in any such report may result in the imposition of criminal penalties as provided for in Section 309 of the FWPCA, 33 U.S.C. §1319, and <u>Code of Alabama</u> 1975, §22-22-14.

D. DEFINITIONS

- 1. Alabama Environmental Management Act (AEMA) means <u>Code of Alabama</u> 1975, §§22-22A-1 <u>et. seq.</u>, as amended.
- 2. Alabama Water Pollution Control Act (AWPCA) means <u>Code of Alabama</u> 1975, §§22-22-1 <u>et</u>. <u>seq</u>., as amended.
- 3. Average monthly discharge limitation means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar

month divided by the number of "daily discharges" measured during that month (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).

- 4. Arithmetic Mean means the summation of the individual values of any set of values divided by the number of individual values.
- 5. BOD means the five-day measure of the pollutant parameter biochemical oxygen demand
- 6. Bypass means the intentional diversion of waste streams from any portion of a treatment facility.
- 7. CBOD means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.
- 8. Controlled Surface Mine Drainage means any surface mine drainage that is pumped or siphoned from the active mining area.
- 9. Daily discharge means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.
- 10. Daily maximum means the highest value of any individual sample result obtained during a day.
- 11. Daily minimum means the lowest value of any individual sample result obtained during a day.
- 12. Day means any consecutive 24-hour period.
- 13. Department means the Alabama Department of Environmental Management.
- 14. Director means the Director of the Department or his authorized representative or designee.
- Discharge means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other waste into waters of the state." <u>Code of Alabama</u> 1975, §22-22-1(b)(8).
- 16. Discharge monitoring report (DMR) means the form approved by the Director to accomplish monitoring report requirements of an NPDES Permit.
- 17. DO means dissolved oxygen.
- 18. E. coli means the pollutant parameter Escherichia coli.
- 19. 8HC means 8-hour composite sample, including any of the following:
 - a. The mixing of at least 5 equal volume samples collected at constant time intervals of not more than 2 hours over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
 - b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
- 20. EPA means the United States Environmental Protection Agency.

- 21. Federal Water Pollution Control Act (FWPCA) means 33 U.S.C. §§1251 et. seq., as amended.
- 22. Flow means the total volume of discharge in a 24-hour period.
- 23. Geometric Mean means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).
- 24. Grab Sample means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.
- 25. Indirect Discharger means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.
- 26. Industrial User means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category "Division D – Manufacturing" and such other classes of significant waste producers as, by regulation, the Director deems appropriate.
- 27. ng/L means milligrams per liter of discharge.
- 28. MGD means million gallons per day.
- 29. Monthly Average means, other than for E. coli bacteria, the arithmetic mean of all the composite or grab samples taken for the daily discharges collected in one month period. The monthly average for E. coli 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. (Zero discharges shall not be included in the calculation of monthly averages.)
- 30. New Discharger means a person owning or operating any building, structure, facility or installation:
 - a. From which there is or may be a discharge of pollutants;
 - b. From which the discharge of pollutants did not commence 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.
- 31. New Source means:
 - a. A new source as defined for coal mines by 40 CFR Part 434.11 (1994); and
 - b. Any building, structure, facility, or installation from which there is or may be a discharge of pollutants, the construction of which commenced:
 - (1) After promulgation of standards of performance under Section 306 of FWPCA which are applicable to such source; or
 - (2) After proposal of standards of performance in accordance with Section 306 of the FWPCA which are applicable to such source, but only if the standards are promulgated in accordance with Section 206 within 120 days of their proposal.
- 32. NH3-N means the pollutant parameter ammonia, measured as nitrogen.

- 33. 1-year, 24-hour precipitation event means the maximum 24-hour precipitation event with a probable recurrence interval of once in one year as defined by the National Weather Service and Technical Paper No. 40, "Rainfall Frequency Atlas of the U.S.," May 1961, or equivalent regional or rainfall probability information developed therefrom.
- 34. Permit application means forms and additional information that are required by ADEM Admin. Code r. 335-6-6-.08 and applicable permit fees.
- 35. Point Source means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. §1362(14).
- 36. Pollutant includes for purposes of this Permit, but is not limited to, those pollutants specified in <u>Code of Alabama</u> 1975, §22-22-1(b)(3) and those effluent characteristics, excluding flow, specified in Part I.A. of this Permit.
- 37. Pollutant of Concern means those pollutants for which a water body is listed as impaired or which contribute to the listed impairment.
- 38. Pollution Abatement and/or Prevention Plan (PAP Plan) mining operations plan developed to minimize impacts on water quality to avoid a contravention of the applicable water quality standards as defined in ADEM Admin. Code r. 335-6-9-.03
- 39. Preparation, Dry means a dry preparation facility within which the mineral/material is cleaned, separated, or otherwise processed without use of water or chemical additives before it is shipped to the customer or otherwise utilized. A dry preparation plant includes all ancillary operations and structures necessary to clean, separate, or otherwise process the mineral/material, such as storage areas and loading facilities. Dry preparation also includes minor water spray(s) used solely for dust suppression on equipment and roads to minimize dust emissions.
- 40. Preparation, Wet means a wet preparation facility within which the mineral/material is cleaned, separated, or otherwise processed using water or chemical additives before it is shipped to the customer or otherwise utilized. A wet preparation plant includes all ancillary operations and structures necessary to clean, separate, or otherwise process the mineral/material, such as storage areas and loading facilities. Wet preparation also includes mineral extraction/processing by dredging, slurry pumping, etc.
- 41. Privately Owned Treatment Works means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a "POTW".
- 42. Publicly Owned Treatment Works (POTW) 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.
- 43. Receiving Stream means the "waters" receiving a "discharge" from a "point source".
- 44. Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
- 45. 10-year, 24-hour precipitation event means that amount of precipitation which occurs during the maximum 24-hour precipitation event with a probable recurrence interval of once in ten years as

defined by the National Weather Service and Technical Paper No. 40, "Rainfall Frequency Atlas of the U.S.," May 1961, or equivalent regional or rainfall probability information developed therefrom.

- 46. TKN means the pollutant parameter Total Kjeldahl Nitrogen.
- 47. TON means the pollutant parameter Total Organic Nitrogen.
- 48. TRC means Total Residual Chlorine.
- 49. TSS means the pollutant parameter Total Suspended Solids
- 50. Treatment facility and treatment system means all structures which contain, convey, and as necessary, chemically or physically treat mine and/or associated preparation plant drainage, which remove pollutants limited by this Permit from such drainage or wastewater. This includes all pipes, channels, ponds, tanks, and all other equipment serving such structures.
- 51. 24HC means 24-hour composite sample, including any of the following:
 - a. The mixing of at least 12 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;
 - b. A sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected; or
 - c. A sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.
- 52. 24-hour precipitation event means that amount of precipitation which occurs within any 24-hour period.
- 53. 2-year, 24-hour precipitation event means the maximum 24-hour precipitation event with a probable recurrence interval of once in two years as defined by the National Weather Service and Technical Paper No. 40, "Rainfall Frequency Atlas of the U.S.," May 1961, or equivalent regional or rainfall probability information developed therefrom.
- 54. Upset means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate facilities, lack of preventive maintenance, or careless or improper operation.
- 55. Waters means "[a]II 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." <u>Code of Alabama</u> 1975, §22-22-1(b)(2). "Waters" include all "navigable waters" as defined in §502(7) of the FWPCA, 33 U.S.C. §1362(7), which are within the State of Alabama.
- 56. Week means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.
- 57. 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

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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.

• E. 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.

F. PROHIBITIONS AND ACTIVIES NOT AUTHORIZED

- 1. Discharges from disposal or landfill activities as described in ADEM Admin. Code div. 335-13 are not authorized by this Permit unless specifically approved by the Department.
- 2. Relocation, diversion, or other alteration of a water of the State is not authorized by this Permit unless specifically approved by the Department.
- 3. Lime or cement manufacturing or production and discharge of process waters from such manufacturing or production is not authorized by this Permit unless specifically approved by the Department.
- 4. Concrete or asphalt manufacturing or production and discharge of process waters from such manufacturing or production is not authorized by this Permit unless specifically approved by the Department.
- 5. 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.

G. DISCHARGES TO IMPAIRED WATERS

- 1. This Permit does not authorize new sources or new discharges of pollutants of concern to impaired waters unless consistent with an EPA-approved or EPA-established Total Maximum Daily Load (TMDL) and applicable State law, or unless compliance with the limitations and requirements of the Permit ensure that the discharge will not contribute to further degradation of the receiving stream. Impaired waters are those that do not meet applicable water quality standards and are identified on the State of Alabama's §303(d) list or on an EPA-approved or EPA-established TMDL. Pollutants of concern are those pollutants for which the receiving water is listed as impaired or contribute to the listed impairment.
- 2. Facilities that discharge into a receiving stream which is listed on the State of Alabama's §303(d) list of impaired waters, and with discharges that contain the pollutant(s) for which the waters are impaired, must within six (6) months of the Final §303(d) list approval, document in its BMP plan how the BMPs will control the discharge of the pollutant(s) of concern, and must ensure that there will be no increase of the pollutants of concern. A monitoring plan to assess the effectiveness of the BMPs in achieving the allocations must also be included in the BMP plan.
- 3. If the facility discharges to impaired waters as described above, it must determine whether a TMDL has been developed and approved or established by EPA for the listed waters. If a TMDL is approved or established during this Permit cycle by EPA for any waters into which the facility discharges, the facility must review the applicable TMDL to see if it includes requirements for control of any water discharged by the Permittee. Within six (6) months of the date of TMDL approval or establishment, the facility must notify the Department on how it will modify its BMP plan to include best management practices specifically targeted to achieve the allocations prescribed

by the TMDL, if necessary. Any revised BMP plans must be submitted to the Department for review. The facility must include in the BMP plan a monitoring component to assess the effectiveness of the BMPs in achieving the allocations.

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H. COASTAL ZONE MANAGEMENT

- 1. Except for those activities described in Part III.H.2., this Permit is conditionally consistent with the Alabama Coastal Area Management Plan (ACAMP) upon continued compliance with the ACAMP.
- 2. The Permittee must apply for and obtain separate Coastal Area Management Plan Certification if any activity constitutes a Major Project as defined by ADEM Admin. Code ch. 335-8-1.

PART IV SPECIAL REQUIREMENTS, RESTRICTIONS, AND LIMITATIONS

A. DISCHARGES TO IMPAIRED WATERS

- 1. This Permit does not authorize new sources or new discharges of pollutants of concern to impaired waters unless consistent with an EPA-approved or EPA-established Total Maximum Daily Load (TMDL) and applicable State law, or unless compliance with the limitations and requirements of the Permit ensure that the discharge will not contribute to further degradation of the receiving stream. Impaired waters are those that do not meet applicable water quality standards and are identified on the State of Alabama's §303(d) list or on an EPA-approved or EPA-established TMDL. Pollutants of concern are those pollutants for which the receiving water is listed as impaired or contribute to the listed impairment.
- 2. Facilities that discharge into a receiving stream which is listed on the State of Alabama's §303(d) list of impaired waters, and with discharges that contain the pollutant(s) for which the waters are impaired, must within six (6) months of the Final §303(d) list approval, document in its BMP plan how the BMPs will control the discharge of the pollutant(s) of concern, and must ensure that there will be no increase of the pollutants of concern. A monitoring plan to assess the effectiveness of the BMPs in achieving the allocations must also be included in the BMP plan.
- 3. If the facility discharges to impaired waters as described above, it must determine whether a TMDL has been developed and approved or established by EPA for the listed waters. If a TMDL is approved or established during this Permit cycle by EPA for any waters into which the facility discharges, the facility must review the applicable TMDL to see if it includes requirements for control of any water discharged by the Permittee. Within six (6) months of the date of TMDL approval or establishment, the facility must notify the Department on how it will modify its BMP plan to include best management practices specifically targeted to achieve the allocations prescribed by the TMDL, if necessary. Any revised BMP plans must be submitted to the Department for review. The facility must include in the BMP plan a monitoring component to assess the effectiveness of the BMPs in achieving the allocations.

B. pH EXEMPTION DISCHARGE LIMITATIONS

Where the application of neutralization and sedimentation treatment technology results in the Permittee's inability to comply with applicable total manganese discharge limitations, the daily maximum discharge limitation for pH shall be 10.5 s.u. However, the discharge shall not cause the in-stream pH values to deviate more than 1.0 s.u. from the normal or natural pH, nor be less than 6.0 s.u., nor greater than 8.5 s.u. Use of this exemption must be noted on the DMR Form when submitted for each eligible outfall. Documentation justifying the necessity for the exemption must be also be submitted at the time of or prior to the associated DMR submittal.

C. MANGANESE EXEMPTION DISCHARGE LIMITATIONS

Limitations and monitoring requirements for total manganese do not apply if the drainage, before any treatment, has a pH equal to or more than 6.0 s.u. Use of this exemption must be noted on the Discharge Monitoring Report (DMR) form when submitted for each eligible outfall. Documentation of drainage with a pH equal to or more than 6.0 s.u. before treatment must also be submitted at the time of or prior to the associated DMR submittal.

acility	Name:	McDuffie	Coal	Terminal	
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Track while PRIM allowed and a					Freehwater Acule (ug/) Q, =1Q10						Freehwatter Chronic (µg/l) Q, = 7Q10				Human Health Consumption Fish only (ug/l) Carcinogen Q, « Annual Average				
rsshwater F&W classification.			Max Daily Discharge as	Daily					Avg Daily Discharge as					Non-Cercinogen Q, = 7Q10					
D Pollutant	RP7	Carcinogan yasi	Background from upstream source (Cd2)	reported by Applicant (Caus)	Water Quality Criterie (C.)	Draft Permit Limit (Cana)	20% of Draft Permit Limit	RP7	Background from upstream source (Cd2) Monthly Ave	reported by Applicant (C)	Water Ounity Criteris (C.)	Draft Permit Limit (C)	20% of Dreft Permit Limit	RP7	Weter Quality Criteria (C.)	Draft Permit Limit (C)	20% of Draft Permit Limit		
1 Antimony			Davidy Max	0			-		Nichterity Ave	0			1		3.73E+02	3.73E+02	7.47E+01	1	
2 Arsenic 3 Berylium		YES	0	0	340.000	340.000	68.000	No	0	0	150.000	150.000	30.000	No	3.03E-01	3.03E-01	6.06E-02	i d	
4 Cadmium 5 Chromium/ Chromium III			0	0	1.026 322.962	1.026 322.962	0.205 64.592	No No	0	0	0.152 42.011	0.152 42.011	0.030 8.402	No No	1		2		
6 Chromium/ Chromium VI 7 Copper			0	0	16.000 6.984	16.000 6.994	3 200	No No	0	0	11,000 4,953	11.000 4.953	2 200 0.991	No No	1.30E+03	1 30E+03	2.60E+02		
8 Lead 9 Mercury			0	0	30.136 2.400	30.136 2.400	6.027 0.480	No No	0	0	1.174 0.012	1.174	0.235	No No	4 24E-02	4.248-02	8.46E-03		
10 Nickel 11 Setenium			0	0	260.491 20.000	280.491 20.000	52.098	No No	0	0	28.933 5.000	28.933 5.000	5.787	No No	9.93E+02 2.43E+03	9.93E+02 2.43E+03	1.99E+02 4.86E+02		
12 Silver 13 Thailium			0	0	0.976	0.976	0.195	No +	0	0	:	-		:	2 746-01	2.74E-01	5.47E-02	1	
14 Zinc 15 Cyanide			0	0.032	65.132 22.000	65.132 22.000	13.026	No No	0 Q	0.092	65.664 5.200	65.664 5.200	13.133	Na Na	1 49E+04 9 33E+03	1.49E+04 9.33E+03	2.98E+03 1.87E+03		
16 Total Phenolic Compounds 17 Hardness (As CaCO3)			0	0	-	-	-	•	0	0		-	1	-			:		
18 Acrolein 19 Acrylonitrile		YES	0	0		-		-	0	0	:		-	-	5.43E+00 1.44E-01	5.43E+00	1.09E+00 2.88E-02		
20 Aldrin 21 Benzene		YES	0	0	3 000	3.000	0.600	No	0	0		-	-	-	2 94E-05 1 55E+01	2.94E-08 1.55E+01	5.88E-08 3 DBE+00		
22 Bromoform 23 Carbon Tetrachloride		YES	0	0	•		-	-	0	0		-			7.88E+01 9.57E-01	7.68E+01 9.57E-01	1.58E+01 1.91E-01		
24 Chlordane		YES	0	0	2 400	2.400	0.480	No	0	0	0.0043	0.004	0.001	No	4.73E-04 9.08E+02	4.73E-04 9.08E+02	9.48E-05 1.81E+02		
25 Clorobenzene 26 Chlorodibromo-Methane		YES	0	0			-		0	0			-	-	7.41E+00	7.41E+00	1.48E+00		
27 Chloroethane 28 2-Chloro-Ethylvinyl Ether			0	0	1	-	-		0	0		-	-	•					
29 ChloroForm 30 4,4 - DDD		YES	0	0		-	1		0	0	-	-	2	•	1.02E+02 1.81E-04	1.02E+02 1.81E-04	2.04E+01 3.83E-05		
31 4.4 - DDE 32 4.4 - DDT		YES YES	0	0	1 100	1 100	0 220	No	0	0	0.001	0.001	0.000	No	1.28E-04 1.28E-04	1.28E-04 1.28E-04	2.58E-05 2.56E-05		
33 Dichlorobromo-Methane 34 1, 1-Dichloroethane		YES	0	0	1		1	:	0	0	-			-	1.00E+01	1.00E+01	2.01E+00		
35 1, 2-Dichloroethane 36 Trans-1, 2-Dichloro-Ethylene		YES	0	0	1	-		-	0	0	1			•	2.14E+01 5.91E+03	2.14E+01 5.91E+03	4.27E+00 1.18E+03		
37 1, 1-Dichlorosthylans 38 1, 2-Dichloropropane		YES	0	0	:				0	0	1		1	-	4.17E+03 8.49E+00	4.17E+03 8.49E+00	8.33E+02 1.70E+00		
39 1, 3-Dichloro-Propylene 40 Dieldrin		YES	0	0	0.240	0.240	0.048	No	0	0	0.056	0.056	0.011	- No	1.23E+01 3.12E-05	1.23E+01 3.12E-05	2.45E+00 8.25E-08		
41 Ethylberizene 42 Methyl Bromide			0	0	:	:	-		0	0	1		2	•	1.24E+03 8.71E+02	1.24E+03 8.71E+02	2.49E+02 1.74E+02		
43 Methyl Chloride 44 Methylene Chloride		YES	0	0		•			0	0		:	-	-	3.46E+02	3.46E+02	8.91E+01		
45 1, 1, 2, 2-Tetrachioro-Ethane 46 Tetrachioro-Ethylene		YES	0	0				-	0	0			-	-	2.33E+00 1.92E+00	2.33E+00 1.92E+00	4.57E-01 3.63E-01		
47 Toluene 48 Toxaphene		YES	D	0	0 730	0.730	0.148	No	0	0	0.0002	0.000	0.000	No	8.72E+03 1.82E-04	8.72E+03 1.62E-04	1.74E+03 3.24E-05		
49 Tributyttin (TBT)		YES	0	0	0.480	0.460	0.092	No	0	0	0.077	0.077	0.014	No	-	1.022-04	3.246-40		
50 1, 1, 1-Trichloroethane 51 1, 1, 2-Trichloroethane		YES	0	0	1	-			0	0			2	-	9 10E+00	9.10E+00	1 82E+00		
52 Trichlorethylene 53 Vinyl Chloride		YES YES	0	0		-	-	1	0	0					1.75E+01 1.42E+00	1.75E+01 1.42E+00	3.49E+00 2.85E-01		
54 P-Chloro-M-Cresol 55 2-Chlorophenol			0	0	1	-		-	0	0			1	1	8.71E+01	8.71E+01	1.74E+01		
56 2, 4-Dichlorophenol 57 2, 4-Dimethylphenol			0	0		-	-	-	0	0	1		-	•	1.72E+02 4.96E+02	1.72E+02 4.96E+02	3.44E+01 9.95E+01		
58 4, 6-Dinitro-O-Cresol 59 2, 4-Dinitrophenci			0	0				:	0	0			-		3.11E403	3.11E+03	6 22E+02		
60 4,6-Dinitro-2-methylphenol 61 Dioxin (2,3,7,8-TCDD)		YES YES	0	0				-	0	0		-		-	1.65E+02 2.67E-08	1.65E+02 2.67E-08	3.31E+01 5.33E-08		
62 2-Nitrophenel		TEa	0	0		-	-	-	0	0	-		-	-	-	-			
63 4-Nitrophenol 64 Pertachlorophenol		YES	0	0	15.943	15.943	3.189	No	0	0	12.231	12 231	2.445	No	1.77E+00	1.77E+00	3.54E-01		
65 Phenol 66 2, 4, 6-Trichlorophenol		YES	0	0	:	-		1	0	0			-	1	5.00E+05 1.41E+00	5.00E+05 1.41E+00	1.00E+05 2.83E-01		
67 Acenaphthene 68 Acenaphthylene			0	0			1	1	0	0		:			5.79E+02	5.79E+02	1.16E+02		
69 Anthracene 70 Benzidine			0	0		2	-	-	0	0					2.33E+04 1.16E-04	2.33E+04 1.16E-04	4.67E+03 2.32E-05		
71 Benzo(A)Anthracene 72 Benzo(A)Pyrene		YES YES	0	0	1	-		-	0	0	1	-	1	-	1.07E-02 1.07E-02	1.07E-02 1.07E-02	2.13E-03 2.13E-03		
73 Benzo(b)fluoranthene 74 Benzo(GHI)Perylene			0	0		-			0	0	1	-	-		1.07E-02	1.07E-02	2.13E-03		
75 Benzo(K)Fluoranthene 76 Bis (2-Chloroethcxy) Methane			0	0			-	-	0	0		•	-	-	1.07E-02	1.076-02	2.13E-03		
77 Bis (2-Chloroethyl)-Ether 78 Bis (2-Chloroiso-Propyl) Ether		YES	0	0				-	0	0		-	-	:	3.07E-01 3.78E+04	3.07E-01 3.78E+04	6.15E-02 7.56E+03		
79 Bis (2-Ethylhexyl) Phthalate		YES	0	0		-	-		0	0			-	-	1.28E+00	1.28E+00	2.56E-01		
80 4-Bromophenyl Phenyl Ether 81 Butyl Benzyl Phthalate			0	0	1.1	-	-	-	0	0	-	-	-	-	1.13E+03	1.13E+03	2.25E+02		
82 2-Chloronaphthalene 83 4-Chlorophenyl Phenyl Ether		1.00	0	0		-		1	0	0		-	-		9.24E+02	9.24E+02	1.85E+02		
84 Chrysene 85 Di-N-Butyl Phthalate		YES	0	0	1	-	-		0	0		2	1		1.07E-02 2.62E+03	1.07E-02 2.62E+03	2.13E-03 5.24E+02		
86 Di-N-Octyl Phthalate 87 Dibenzo(A,H)Anthracene		YES	0	0	:		-	1	0	0	1		2	-	1.07E-02	1.07E-02	2.13E-03		
88 1, 2-Dichlorobenzene 89 1, 3-Dichlorobenzene			0	0 0		1		-	0	0			-		7.55E+02 5.62E+02	7.55E+02 5.62E+02	1.51E+02 1.12E+02		
90 1, 4-Dichlorobenzene 91 3, 3-Dichlorobenzidine		YES	0	0		2	-	-	0	0	:		-	:	1.12E+02 1.66E-02	1.12E+02 1.66E-02	2.25E+01 3.32E-03		
92 Diethyl Phthalate 93 Dimethyl Phthalate			0	0		-	1	-	0	0	:		-		2.56E+04 6.46E+05	2.56E+04 6.48E+05	5.11E+03 1.30E+05		
94 2, 4-Dinitrotoluene 95 2, 6-Dinitrotoluene		YES	0	0		-	1	1	0	0	1		1	:	1.96E+00	1.98E+00	3.96E-01		
96 1.2-Diphenyihydrazine 97 Endosulfan (alpha)		YES	0	0	0.22	0.220	0.044	- No	0	0	0.056	0.056	0.011	- No	1.17E-01 5.19E+01	1.17E-01 5.19E+01	2.34E-02 1.04E+01		
98 Endosulfan (beta) 99 Endosulfan sulfate		YES	0	0	0.22	0.220	0.044	No	0	0	0.056	0 056	0.011	No	5.19E+01 5.19E+01	5.19E+01 5.19E+01	1.04E+01 1.04E+01		
00 Endrin 01 Endrin Aldeyhde		YES YES	0	0	0.086	0.086	0.017	No	0	0	0.036	0.036	0.007	No	3.53E-02 1.76E-01	3.53E-02 1.76E-01	7.05E-03 3.53E-02		
02 Fluoranthene 03 Fluorene			0	0	:		-	-	0	0	-	;		1	8.12E+01 3.11E+03	8.12E+01 3.11E+03	1.62E+01 6.22E+02		
04 Heptschlor 05 Heptschlor Epoxide		YES YES	0	0	0.52	0.520	0.104	No No	0	0	0.0038	0.004	0.001	No No	4.63E-05 2.29E-05	4.63E-05 2.29E-05	9.26E-08 4.58E-08		
06 Hexachlorobenzene		YES	0	0	-				0	0			-	-	1.68E-04	1.68E-04	3.36E-05 2.15E+00		
07 Hexachlorobutadiene 08 Hexachlorocyclohexan (alpha)		YES	0	0		-	1	-	D	0	-	-	-	-	1.08E+01 2.85E-03	1.08E+01 2.85E-03	5.70E-04		
09 Hexachlorocyclohexan (beta) 10 Hexachlorocyclohexan (gamma)		YES YES	0	0	0.95	0.950	0.190	No	0	0			-	:	9.97E-03 1.08E+00	9.97E-03 1.08E+00 6.45E+02	1.99E-03 2.15E-01 1.29E+02		
11 HexachlorocycloPentadiene 12 Hexachloroethane			0	0		:	-		0	0			1		6.45E+02 1.92E+00	1.92E+00	3.84E-01		
13 Indeno(1, 2, 3-CK)Pyrene 14 Isophorone		YES	0	0	1	÷	-		0	0		:	-	-	1.07E-02 5.61E+02	1.07E-02 5.61E+02	2.13E-03 1 12E+02		
15 Naphthalene 16 Nitrobenzene			0	0		•		:	0	0			-	•	4 04E+02	4.04E+02	8.07E+01		
17 N-Nitrosodi-N-Propylamine 18 N-Nitrosodimethylamine		YES YES	0	0	:			:	0	0		÷	-	:	2.95E-01 1.76E+00	2.95E-01 1.76E+00	5.90E-02 3.52E-01		
19 N-Nitrosodiphenylamine 20 PCB-1016		YES	0	0		-	-	-	0	0	0.014	0.014	0.003	No	3.50E+00 3.74E-05	3.50E+00 3.74E-05	7.00E-01 7.48E-06		
21 PCB-1221		YÉS	0	0		-			0	0	0.014	0.014	0.003	No	3.74E-05 3.74E-05 3.74E-05	3.74E-05 3.74E-05	7.48E-08 7.48E-08		
22 PCB-1232 23 PCB-1242		YES	0	0	1	-	-	:	0	0	0.014	0.014	0.003	Na	3.74E-05	3.74E-05	7.48E-06		
24 PCB-1248 25 PCB-1254		YES YES	0	0	1.1		-		0	0	0.014	0.014	0.003	No No	3.74E-05 3.74E-05	3.74E-05 3.74E-05	7.48E-08 7.48E-08		
26 PCB-1260 27 Phonanthrene		YES	0	0	-		-	-	0	0	0.014	0.014	0.003	No	3.74E-05	3.74E-05	7.48E-08		
28 Pyrana	1	1	0	0		-	-		0	0				-	2.33E+03	2.33E+03	4.67E+02		

 126 (Proch-zoro)

 127 (Proce-zoro)

 127 (Proce-zoro)

 128 (Proce-zoro)

 129 (Proce-zoro)

 129 (Proce-zoro)

 120 (Proce-zoro)

 120 (Proce-zoro)

 120 (Proce-zoro)

 121 (Proce-zoro)

 122 (Proce-zoro)

 120 (Proce-zoro)

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT WATER DIVISION

NPDES INDIVIDUAL PERMIT RATIONALE

Company Name:	Alabama State Port Authority
Facility Name:	McDuffie Coal Terminal
County:	Mobile
Permit Number:	AL0042374
Prepared by:	Jasmine White
Date:	January 9, 2025
Receiving Waters:	Mobile Bay
Permit Coverage:	Transportation and Storage of Coal and Associated Areas
SIC Code:	4491

The Department has made a tentative determination that the available information is adequate to support reissuance of this permit.

This proposed permit covers transportation and storage of coal and associated areas which discharge to surface waters of the state.

The proposed permit authorizes treated discharges into the Mobile Bay classified as Fish & Wildlife (F&W) per ADEM Admin. Code ch. 335-6-11. If the requirements of the proposed permit are fully implemented, the facility will not discharge pollutants at levels that will cause or contribute to a violation of the F&W classification.

Full compliance with the proposed permit terms and conditions is expected to be protective of instream water quality and ensure consistency with applicable instream State water quality standards (WQS) for the receiving stream.

The discharge limitations for the daily maximum and minimum of pH, and the monthly average and daily maximum of Total Suspended Solids (TSS), Total Iron as Fe, and Total Manganese as Mn are based on the New Source Performance Standards (NSPS) Effluent Limit Guidelines (ELGs) found in 40 CFR Part 434.25(a) for coal preparation plats and associated areas.

However, the Permittee may submit documentation that discharges from the site normally exhibit a pH equal to or greater than 6.0 s.u. prior to treatment. Part IV.C. of the proposed permit provides that limitations and monitoring requirements for Total Manganese as Mn do not apply if the Permittee has provided the documentation of discharges prior to treatment have a pH equal to or greater than 6.0 s.u. In such a case, the discharge limitations for the daily maximum and minimum of pH and Total Iron as Fe are based on the NSPS ELGs found in 40 CFR Part 434.25(b) for coal preparation and associated areas.

The instream WQS for pH, for streams classified as F&W, are 6.0 - 8.5 s.u per ADEM Admin Code r. 335-6-10-.09; however, because discharges from Outfall 001-1 are expected only in response to rain events, it is the opinion of the Department that discharges with an allowable pH daily maximum of 9.0 will not adversely affect the instream pH based on the low discharge/stream flow ratio. The discharge limitations for pH of 6.0 - 9.0 s.u. for Outfall 001-1 are identical to the NSPS ELGs found in 40 CFR Part 434.25(a).

The ELGs of 40 CFR Part 434.62 allow the pH level in the final discharge to exceed 9.0 s.u. when neutralization and sedimentation treatment technology results in the Permittee's inability to comply with the applicable total manganese limitations. The acidity and metals composition of each discharge is unique and sometimes a pH value of 10.5 is necessary for the removal of manganese. However, the discharge shall not cause the in-stream pH to deviate more than 1.0 s.u. from the normal or natural pH, nor be less than 6.0 s.u., nor greater than 8.5 s.u. in accordance with ADEM Admin. Code r. 335-6-10-.09.

Additional effluent monitoring for Specific Conductance, Sulfate as S, and Total Dissolved Solids (TDS) is required so that future determinations can be made as to whether or not a reasonable potential to cause or contribute to an excursion of numeric or narrative WQS exists from this and similar discharges.

The applicant has, in accordance with 40 CFR Part 122.21 and their NPDES permit application, submitted representative effluent data for parameters listed on EPA Form 2C as part of the application. The Department has reviewed available data in ALAWADR, ADEM's water quality database, and found nothing to contradict the data submitted by the applicant.

The Department completed a reasonable potential analysis (RPA) of the discharges based on the laboratory data provided in the application. The RPA indicates whether or not pollutants in treated effluent have the potential to contribute to excursions of Alabama's in-stream WQS. Based on the analytical data submitted by the Permittee, the RPA indicates that there was no reasonable potential for instream WQS to be exceeded.

The Pollution Abatement/Prevention (PAP) plan for this facility has been prepared by a professional engineer (PE) registered in the State of Alabama and is designed to ensure reduction of pollutants in the waste stream to a level that, if operated properly, the discharge will not contribute to or cause a violation of applicable State WQS. The proposed permit terms and conditions are predicated on the basis of ensuring a reduction of pollutants in the discharge to a level that reduces the potential of contributing to or causing a violation of applicable State WQS.

In accordance with ADEM Admin. Code r. 335-6-3-.07 the design PE, as evidenced by their seal and/or signature on the application, has accepted full responsibility for the effectiveness of the waste treatment facility to treat the Permittee's effluent to meet NPDES permit limitations and requirements, and to fully comply with Alabama's WQS, when such treatment facilities are properly operated.

If there is a reasonable potential that a pollutant present in the treated discharges from a facility could cause or contribute to a contravention of applicable State WQS above numeric or narrative criteria, 40 CFR Part 122 requires the Department to establish effluent limits using calculated water quality criterion, establish effluent limits on a case-by-case basis using criteria established by EPA, or establish effluent limits based on an indicator parameter. Based on available information, potential pollutants discharged from this facility, if discharged within the concentrations allowed by this permit, would not have a reasonable potential to cause or contribute to a contravention of applicable State WQS.

Pursuant to ADEM Admin. Code r. 335-6-6-.12(r) this permit requires the Permittee to design and implement a Spill Prevention Control and Countermeasures (SPCC) plan for all stored chemicals, fuels and/or stored pollutants that have the potential to discharge to a water of the State. This plan must meet the
minimum engineering requirements as defined in 40 CFR Part 112 and must provide for secondary containment adequate to control a potential spill.

The applicant is not proposing discharges of pollutants to a water of the State with an approved Total Maximum Daily Load (TMDL).

The applicant is not proposing discharges into a stream segment or other State water that is included on Alabama's current CWA §303(d) list.

However different segments of Mobile Bay are on the 303(d) list for pathogens and an approved Total Maximum Daily Load (TMDL) for pathogens. The Department believes these pollutants will not be present in the discharge at levels of concern and or the facility will not discharge this pollutant at levels that will cause or contribute to a violation of applicable State water quality standards in the receiving water. Therefore, monitoring and reporting requirements for the pathogens are not being imposed by the Department.

The applicant is not proposing new discharges of pollutant(s) to an ADEM identified Tier I water.

The proposed permit does not authorize new or increased discharges of pollutants to a Tier II water. Therefore, the Antidegradation Policy (ADEM Admin. Code 335-6-10-.04) does not apply to this permit.

NPDES Individual Permit -Modification/Reissuance - Mining (Form 315)

Digitally signed by: AEPACS Date: 2023.03.24 18:01:11 -05:00 Reason: Submission Data Location: State of Alabama

version 4.5

(Submission #: HPS-BWK2-MJZJF, version 1)

Details

Submission ID HPS-BWK2-MJZJF

Form Input

General Instructions

NPDES Individual Application - Mining and Coalbed Methane Operations - Mod/Reissuance (Form 315/549)

PLEASE CONTACT YOUR ASSIGNED PERMIT CONTACT TO DISCUSS THE TYPE OF MODIFICATION YOU SHOULD APPLY FOR BEFORE COMPLETING THIS FORM.

This form should be used to submit the following permit requests for individually permitted Mining and Coalbed Methane Operations:

Modifications/Reissuances that include Permit Transfers and/or Permittee/Facility Name Changes Minor Modifications Major Modifications Reissuances Reissuance of a permit on or after the current permit s expiration date Revocation and Reissuance before the current permit s expiration date

Please complete all questions and attach all necessary documentation as prompted throughout the application process. Incomplete or incorrect information will delay processing.

Applicable Fees: Minor Modifications \$3,400 (Mineral/Resource Extraction Mining, Storage Transloading, Dry Processing) \$3.940 (Wet Preparation, Processing, Beneficiation) \$3.940 (Coalbed Methane Operations) Major Modifications \$5,820 (Mineral/Resource Extraction Mining, Storage Transloading, Dry Processing) \$6.860 (Wet Preparation, Processing, Beneficiation) \$6,860 (Coalbed Methane Operations) Reissuances \$5,820 (Mineral/Resource Extraction Mining, Storage Transloading, Dry Processing) \$6,860 (Wet Preparation, Processing, Beneficiation) \$6,860 (Coalbed Methane Operations) Potential Add-on Fees for Major Modifications and Reissuances \$1,015 (Biomonitoring & Toxicity Limits) \$2,705 (Review of Model Performed by Others) \$4,855 (Modeling desktop) For assistance, please click here to determine the permit staff responsible for the site or call (334) 394-4372.

Processing Information

Purpose of Application Reissuance and Modification 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 with Modification

Briefly describe any planned changes at the facility that are included in this reissuance application: None.

Is this a coalbed methane operation? No

Permit Information

Permit Number AL0042374

Current Permittee Name Alabama State Port Authority

Permittee

Permittee Name

Alabama State Port Authority

Mailing Address

PO BOX 1588

Mobile, AL 36633

Responsible Official

Prefix Mr. First Name Last Name Rick Clark Title Chief Operating Officer **Organization Name** Alabama State Port Authority Phone Type Number Extension Business 2514417238 Email rclark@asdd.com Mailing Address P.O. Box 1588 Mobile, AL 36633

Existing Permit Contacts

Affiliation Type	Contact Information	Remove?
Permittee	Alabama State Port Authority	Кеер
Facility Contact	Bruce Newell	Кеер
Responsible Official, Notification Recipient	Rick Clark	Keep

Facility/Operations Information

Facility/Operations Name McDuffie Coal Terminal

Permittee Organization Type State

Parent Corporation and Subsidiary Corporations of Applicant, if any:

NONE PROVIDED

Landowner(s) Name, Address and Phone Number:

Alabama State Port Authority PO Box 1588 Mobile, AL 36633-1588 251-441-7203

Sub-contractor(s)/Operator(s), if known:

NONE PROVIDED

Facility/Operations Address or Location Description

1768 Yeend Loop Mobile, AL 36603

Facility/Operations County (Front Gate) Mobile

Mobile

Do the operations span multiple counties? No

Detailed Directions to the Facility/Operations

To enter the visitor gate, take exit 25B from I-10 W. At the fork, turn left toward Virginia Street. After the bridge, continue past the container terminal until you reach the gate on the left at 1901 Ezra Trice Blvd.

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

Facility/Operations Front Gate Latitude and Longitude 30.662010879117513,-88.03585830688476

1768 Yeend Loop, Mobile, AL

Township(s), Range(s), Section(s) (Note: If you are submitting multiple TRSs, please separate each TRS by a semicolon. Example: T19S,R1E,S15; T20S,R2E,S16) TS4S,R1W,S25; TS4S,R1W,S35; TS4S,R1W,S36;

SIC Code(s) [Please select your primary SIC code first]: 4491-Marine Cargo Handling

NAICS Code(s) [Please select your primary NAICS code first]: 488320-Marine Cargo Handling

Facility/Operations Contact

Prefix Mr.		
First Name Bruce	Last Name Newell	
Title Environmenta	l Labor Supervi	sor
Organization Alabama State	Name Port Authority	
Phone Type	Number	Extension
Business	2518953943	
Mobile	2515250782	
Email bruce.newell@	ALports.com	

Member Information

Identify the name, title/position, and unless waived in writing by the Department, the resident address of every officer (a PO Box is not acceptable), general partner, LLP partner, LLC member, investor, director, or person performing a function similar to a director, of the applicant, and each person who is the record or beneficial owner of 10 percent or more of any class of voting stock of the applicant, or any other responsible official(s) of the applicant with legal or decision making responsibility or authority for the facility/operations (if this does not apply, then enter N/A after selecting "Manually Enter in Table"):

List of Names/Titles/Addresses will be entered by:

Manually Entering in Table

Name	Title/Position	Physical Address of Residence	
Rick Clark	Chief Operating Officer	1504 Captain Oneal Drive Daphne, AL 36526	

Other than the Company/Permittee", identify the name of each corporation, partnership, association, and single proprietorship for which any individual identified above is or was an officer, general partner, LLP partner, LLC member, investor, director, or individual performing a function similar to a director, or principal (10% or more) stockholder, that had an Alabama NPDES permit at any time during the five year (60 month) period immediately preceding the date on which this form is signed (if this does not apply, then enter N/A after selecting "Manually Enter in Table"):

List of Corporations/Partnerships/etc, Names and Titles will be entered by:

Manually Entering in Table

Name of Corporation, Partnership,	Name of	Title/Position in Corporation, Partnership,
Association, or Single Proprietorship	Individual	Association, or Single Proprietorship
N/A	N/A	N/A

Additional Contacts (1 of 1)

ADDITIONAL CONTACTS:

Contact Type

NONE PROVIDED

Contact		
First Name NONE PROVIDED	Last Name NONE PRO	
Title NONE PROVIDED		
Organization Name NONE PROVIDED		
Phone Type	Number	Extension
NONE PROVIDED		
Email NONE PROVIDED		
Address		
[NO STREET ADDRE	SS SPECIFIED	
[NO CITY SPECIFIED]	AL INO ZIP CO	

Compliance History

Has the applicant ever had any of the following:

Event	Apply?
An Alabama NPDES, SID, or UIC permit suspended or terminated	No
An Alabama or federal environmental permit suspended/terminated	No
An Alabama State Oil Gas Board permit or other approval suspended or terminated	No
An Alabama or federal performance/environmental bond, or similar security deposited in lieu of a bond, or portion thereof, forfeited	No

Has the applicant, parent corporation, subsidiary, general partner, LLP partner, or LLC Member had any Warning Letters, Notice of Violations (NOVs), Administrative Actions, or litigation filed by ADEM or EPA during the three year (36 month) period preceding the date on which this form is signed? No

For this facility, list any other NPDES or other environmental permits (including permit numbers), authorizations, or certifications that have been applied for or issued within the State by ADEM, EPA, Alabama Department of Labor (ADOL), US Army Corp of Engineers (USACE), or other agency, to the applicant, parent corporation, subsidiary, or LLC member whether presently effective, expired, suspended, revoked, or terminated: 503-8011-X002 (air): SAM-2020-00757-JCC

For other facilities, list any other NPDES or other ADEM permits (including permit numbers), authorizations, or certifications that have been applied for or issued within the State by ADEM, EPA, ASMC, ADOL, or USACE, to the applicant, parent corporation, subsidiary, or LLC member whether presently effective, expired, suspended, revoked, or terminated:

AL0002976 (NPDES), ALG140910 (NPDES), AL0047651 (NPDES), ALG140031 (NPDES), ALG140032 (NPDES), ALG140689 (NPDES), ALD058221326 (HWFP), ALD044490183 (HWFP), ALG00654711 (air), IU414900428 (SID), 503-8002-X002 (air), SW-123123-0049 (solid waste cert), ALR10C2UA (NPDES), SAM-2014-00848-GAC/ADEM-2014-331.1-WQC-COE-LOP, SAM-2020-00759-JCC, SAM-2020-00758-JCC, SAM-2020-00344-JCC, SAM-2020-00346-JCC, SAM-2020-00345-JCC, SAM-2017-00189-JEB

Anti-Degradation Evaluation

Pursuant to ADEM Admin. Code ch. 335-6-10-.12(9), responses to the following questions must be provided by the applicant requesting NPDES permit coverage for new or expanded discharges of pollutant(s) to Tier 2 waters (except discharges eligible for coverage under general permits). As part of the permit application review process, the Department is required to consider, based on the applicant s demonstration, whether the proposed new or increased discharge to Tier 2 waters is necessary for important economic or social development in the area in which the waters are located. Does this modification/reissuance include new or expanded discharges to Tier II water(s)? No

Activity Description & Information

Narrative description of activity(s):

Bulk materials are received from ships, barges, rail, temporarily stored, then reloaded and shipped to a new location.

Total Facility/Operations Area (acres) 154.00

Total Disturbed Area (acres) 154.00

Anticipated Commencement Date 01/01/1975

Anticipated Completion Date 01/01/2100

Please identify which of the following apply to this operation:

Activity/Condition	Appy?
An existing facility/operation which currently results in discharges to State waters?	Yes
A proposed facility/operation which will result in a discharge to State waters?	No

Activity/Condition	Appy?
Be located within any 100-year flood plain?	Yes
Discharge to Municipal Separate Storm Sewer?	No
Discharge to waters of or be located in the Coastal Zone?	Yes
Need/have ADEM UIC permit coverage?	No
Be located on Indian/historically significant lands?	Yes
Need/have ADEM SID permit coverage?	No
Need/have ASMC permit coverage?	No
Need/have State Oil & Gas Board permit coverage?	No
Need/have ADOL permit coverage?	No
Generate, treat, store, or dispose of hazardous or toxic waste?	No
Be located in or discharge to a Public Water Supply (PWS) watershed or be located within mile of any PWS well?	No
Incised pit	No

Does your facility/operation use cooling water?

No

Material to be Removed, Processed, or Transloaded

Material To Be Removed, Processed, Or Transloaded (Note: Sum must equal 100.)

Mineral(s)/Mineral product(s)	%
Coal	100
	Sum: 100

Proposed Activity To Be Conducted

Type(s) of activity presently conducted at applicant's existing facility or proposed to be conducted at facility (Select Yes or No)):

Activity	Apply?
Adjacent/associated asphalt/concrete plant(s)	No
Alternative fuels operation	No
Auger mining	No
Cement production	No
Chemical processing or leaching	No
Chemicals used in process or wastewater treatment (coagulant, biocide, etc.)	No
Construction related temporary borrow pits/areas	No
Creek/stream crossings	No
Excavation	No
Grading, clearing, grubbing, etc.	No
Hydraulic mining	No
Hydraulic mining, dredging, instream or between stream-bank mining	No
Lime production	No
Low volume sewage treatment package plant	No
Mineral dry processing (crushing & screening)	No
Mineral loading	Yes
Mineral storing	Yes
Mineral transportation	Yes

Activity	Apply?
Mineral wet preparation	No
Onsite construction debris or equipment storage/disposal	Yes
Onsite mining debris or equipment storage/disposal	No
Other beneficiation & manufacturing operations	No
Pre-construction ponded water removal	No
Pre-mining logging or land clearing	No
Preparation plant waste recovery	No
Quarrying	No
Reclamation of disturbed areas	No
Solution mining	No
Surface mining	No
Synthetic fuel production	No
Underground mining	No
Waterbody relocation or other alteration	No
Within-bank mining	No

If the operation will include activities other than those listed above, please describe them below: NONE PROVIDED

If the type of activity presently conducted or proposed is Mineral Transportation, please indicate which of the following apply:

Barge	Apply?	
Barge	Yes	
Rail	Yes	
Truck	No	

Fuel - Chemical Handling, Storage, & Spill Prevention Control & Countermeasures (SPCC) Plan

Will fuels, chemicals, compounds, or liquid waste be used or stored onsite? Yes

Please identify the fuel, chemicals, compounds, or liquid waste and indicate the volume of each:

Volume (gallons)	Contents
15,200	diesel
9,000	gasoline
1,200	oil

SPCC Plan

McDuffie SPCC March 2023.pdf - 03/24/2023 12:43 PM Comment NONE PROVIDED

ASMC Regulated Entities

Is this a coal mining operation regulated by ASMC? No

Topographic Map Submittal

Topographic Map

Attach to this application a 7.5 minute series U.S.G.S. topographic map(s) or equivalent map(s) no larger than, or folded to a size of 8.5 by 11 inches (several pages may be necessary), of the area extending to at least one mile beyond property boundaries. The topographic or equivalent map(s) must include a caption indicating the name of the topographic map, name of the applicant, facility name, county, and township, range, & section(s) where the facility are located. Unless approved in advance by the Department, the topographic or equivalent map(s), at a minimum, must show: a) An accurate outline of the area to be covered by the permit (b) An outline of the facility (c) All existing and proposed disturbed areas (d) Location of intake and discharge areas (e) Proposed and existing discharge points (f) Perennial, intermittent, and ephemeral streams (g) Lakes, springs, water wells, wetlands (h) All known facility dirt/improved access/haul roads (i) All surrounding unimproved/improved roads (j) High-tension power lines and railroad tracks (k) Contour lines, township-range-section lines (l) Drainage patterns, swales, washes (m) All drainage conveyance/treatment structures (ditches, berms, etc.) (n) Any other pertinent or significant feature.

Topographic Map

Figure 1 Site Location Map.pdf - 03/24/2023 12:51 PM Figure 2 Site Aerial Map.pdf - 03/24/2023 12:51 PM Figure 3 Site Drainage Plan.pdf - 03/24/2023 12:51 PM Comment NONE PROVIDED

Detailed Facility Map Submittal

Detailed Facility Map

Figure 3 Site Drainage Plan.pdf - 03/24/2023 02:56 PM Comment NONE PROVIDED

Outfalls (1 of 1)

Outfall Identifier: 001

Feature Type Outfall (External)

Outfall Identifier 001

Outfall Status Existing

Please be aware that you should only mark an outfall status as existing if (1) the Department has been previously notified that it was constructed as proposed or (2) it began discharge prior to this application. A proposed outfall is one that is being newly added to the permit OR one that has never discharged or has never been authorized by the Department to discharge. Should you have any questions about which status to select, please contact the Department's permit engineer for this site.

Permit Action Reissue

Receiving Water Mobile Bay

Check below if the discharge enters the receiving water via an unnamed tributary. NONE PROVIDED

Location of Outfall 30.65111100000000, -88.0350000000000

Are the location coordinates above still correct for this outfall? Yes

Distance to Receiving Water (ft) 270

3/24/2023 6:01:11 PM

Disturbed Area (acres) 154

Drainage Area (acres) 154

303(d) Segment? No

TMDL Segment? No

Please do not add a new outfall unless you are requesting a modification that includes a new outfall. All of the currently permitted outfalls are already included in this form. If you add an outfall in error, please choose **O**lelete**O** under **O** Permit Action**O** for the outfall. If you have any questions, please contact your permit engineer BEFORE proceeding.

Discharge Characterization

EPA Form 2C, EPA Form 2D, and/or ADEM Form 567 Submittal No, the applicant does not request a waiver and a complete EPA Form 2C, EPA Form 2D, and/or ADEM Form 567 is attached.

Please attach EPA Form 2C, EPA Form 2D, and/or ADEM Form 567.

EPA Form 2C.pdf - 03/24/2023 03:57 PM Comment NONE PROVIDED

Please download the following Excel file to enter your information. Once complete, please attach to the below control. Download spreadsheet here.

Required attachment:

Form315TableB.xlsx - 03/24/2023 04:20 PM Comment NONE PROVIDED

Please download the following Excel file to enter your information. Once complete, please attach to the below control. Download spreadsheet here.

Required attachment:

Form315TableC.xlsx-03/24/2023 04:09 PM Comment NONE PROVIDED

Discharge Structure Description & Pollutant Source

Please download the following Excel file to enter your information. Once complete, please attach to the below control. Download spreadsheet here.

Required attachment: <u>Form315DischargeStructure.xlsx - 03/24/2023 03:06 PM</u> Comment NONE PROVIDED

Variance Request

Do you intend to request or renew one or more of the CWA technology variances authorized at 40 CFR 122.21(m)? No

Pollution Abatement & Prevention (PAP) Plan Summary (1 of 1)

Outfall Questions:	Please select one:		
Runoff from all areas of disturbance is controlled	Yes		
Drainage from pit area, stockpiles, and spoil areas directed to a sedimentation pond	Yes		
Sedimentation basin at least 0.25 acre/feet for every acre of disturbed drainage	Yes		
Sedimentation basin cleaned out when sediment accumulation is 60% of design capacity	Yes		
Trees, boulders, and other obstructions removed from pond during initial construction	Yes		
Width of top of dam greater than 12'	Yes		
Side slopes of dam no steeper than 3:1	Yes		
Cutoff trench at least 8' wide	Yes		
Side slopes of cutoff trench no less than 1:1	Yes		
Cutoff trench located along the centerline of the dam	N/A		
Cutoff trench extends at least 2' into bedrock or impervious soil	N/A		
Cutoff trench filled with impervious material	N/A		
Embankments and cutoff trench 95% compaction standard proctor ASTM	N/A		
Embankment free of roots, tree debris, stones >6" diameter, etc.	Yes		
Embankment constructed in lifts no greater than 12"	N/A		
Spillpipe sized to carry peak flow from a one year storm event	Yes		
Spillpipe will not chemically react with effluent	Yes		
Subsurface withdrawal	No		
Anti-seep collars extend radially at least 2' from each joint in spillpipe	N/A		
Splashpad at the end of the spillpipe	Yes		
Emergency Spillway sized for peak flow from 25-yr 24-hr event if discharge not into PWS classified stream	Yes		
Emergency spillway sized for peak flow from 50-yr 24-hr event if discharge is into PWS classified stream	N/A		
Emergency overflow at least 20' long	Yes		
Side slopes of emergency spillway no steeper than 2:1	No		
Emergency spillway lined with riprap or concrete	No		
Minimum of 1.5' of freeboard between normal overflow and emergency overflow	No		
Minimum of 1.5' of freeboard between max. design flow of emergency spillway and top of dam	No		
All emergency overflows are sized to handle entire drainage area for ponds in series	Yes		
Dam stabilized with permanent vegetation	Yes		
Sustained grade of haul road <10%	Yes		
Maximum grade of haul road <15% for no more than 300'	Yes		
Outer slopes of haul road no steeper than 2:1	Yes		
Outer slopes of haul road vegetated or otherwise stabilized	Yes		
Detail drawings supplied for all stream crossings	N/A		
Short-Term Stabilization/Grading And Temporary Vegetative Cover Plans	N/A		
Long-Term Stabilization/Grading And Permanent Reclamation or Water Quality Remediation Plans	N/A		

Identify and provide detailed explanation for any ONO or ON/AO response(s):

No cutoff trench. Construction and stabilization questions were answered N/A due to the construction of the sedimentation ponds occurring more than 20 years ago. No seep collar due to floating weir. No emergency spillway.

Pollution Abatement & Prevention (PAP) Plan Review Checklist

General Information:	Please select one:				
PE Seal with License #	Yes				
Name and Address of Operator	Yes				
Legal Description of Facility	Yes				
Name of Company	Yes				
Number of Employees	Yes				
Products to be Mined	Yes				
Hours of Operation	Yes				
Water Supply and Disposition	Yes				

Maps:	Please select one:		
Topographic Map including Information from Part XIII (a) � (o) of this Application	Yes		
1	Yes		

Detailed Design Diagrams:	Please select one:		
Plan Views	Yes		
Cross-section Views	No		
Method of Diverting Runoff to Treatment Basins	Yes		
Line Drawing of Water Flow through Facility with Water Balance or Pictorial Description of Water Flow	Yes		

Identify and provide detailed explanation for any ONO or ON/AO response(s):

Subbasin details and pond calculations provided.

Narrative of Operations:	Please select one:				
Raw Materials Defined	Yes				
Processes Defined	Yes				
Products Defined	Yes				

Schematic Diagram:	Please select one:				
Points of Waste Origin	NA				
Collection System	Yes				
Disposal System	Yes				

Identify and provide detailed explanation for any ONO or ON/AO response(s):

In general, there is no waste for the transloading of coal.

Post Treatment Quantity and Quality of Effluent:	Please select one:			
Flow	Yes			
Suspended Solids	Yes			
Iron Concentration	Yes			
pH	Yes			

Description of Waste Treatment Facility:	Please select one:			
Pre-Treatment Measures	Yes			
Recovery System	Yes			
Expected Life of Treatment Basin	Yes			

Description of Waste Treatment Facility: Measures for Ensuring Access to All Treatment Structures and Related Appurtenances including Outfall Locations Y					

Other:	Please select one:			
Precipitation/Volume Calculations/Diagram Attached	Yes			
BMP Plan for Haul Roads	Yes			
Measures for Minimizing Impacts to Adjacent Stream (e.g., Buffer Strips, Berms)	Yes			
Measures for Ensuring Appropriate Setbacks are Maintained at All Times	Yes			
Methods for Minimizing Nonpoint Source Discharges	Yes			
If Chemical Treatment Used, Methods for Ensuring Appropriate Dosage	Yes			
Facility Closure Plans	Yes			
PE Rationale(s) For Alternate Standards, Designs or Plans	Yes			

Pollution Abatement & Prevention (PAP) Plan

Is this a coal mining operation regulated by ASMC?

No

PAP Plan (non-coal mining facilities)

MCT Pollution Abatement Plan - Final Report (3-24-2023).pdf - 03/24/2023 02:19 PM Comment NONE PROVIDED

Professional Engineer (PE)

Registration License Number 26748

Professional Engineer

Prefix Mr. First Name Last Name Jason Newton Title Vice President **Organization Name** McFadden Engineering Phone Type Number Extension Business 2514706870 Email bnewton@mcfaddenengineering.com Address 2860 Dauphin Street Suite D Mobile, AL 36606

Information for the Applicant

Please read the following information and acknowledge below:

Contact the Department prior to submittal with any questions or to request acceptable alternate content/format.

Be advised that you are not authorized to commence regulated activity until this application can be processed, publicly noticed, and approval to proceed is received in writing from the Department.

EPA Form(s) 1 and 2F need not be submitted unless specifically required by the Department. EPA Form(s) 2C and/or 2D are required to be submitted unless the

applicant is eligible for a waiver and the Department grants a waiver, or unless the relevant information required by EPA Form(s) 2C and/or 2D are submitted to the Department in an alternative format acceptable to the Department.

Planned/proposed mining sites that are greater than 5 acres, that mine/process coal or metallic mineral/ore, or that have wet or chemical processing, must apply for and obtain coverage under an Individual or General NPDES Permit prior to commencement of any land disturbance. Such Individual NPDES Permit coverage may be requested via this ADEM Form 315.

The applicant is advised to contact:

(1) The Alabama Surface Mining Commission (ASMC) if coal, coal fines, coal refuse, or other coal related materials are mined, transloaded, processed, etc.;

(2) The Alabama Department of Labor (ADOL) if conducting non-coal mining operations;

(3) The Alabama Historical Commission for requirements related to any potential historic or culturally significant sites;

(4) The Alabama Department of Conservation and Natural Resources (ADCNR) for requirements related to potential presence of threatened/endangered species;

(5) The US Army Corps of Engineers, Mobile or Nashville Districts, if this project could cause fill to be placed in federal waters or could interfere with navigation.

The Department must be in receipt of a completed version of this form, including any supporting documentation, and the appropriate processing fee [including Greenfield Fee and Biomonitoring & Toxicity Limits fee(s), if applicable], prior to development of a draft NPDES permit.

Acknowledgement

lacknowledge I have read and understand the information above.

Additional Attachments

Additional Attachments

NONE PROVIDED Comment NONE PROVIDED

Application Preparer

Application Preparer

Prefix NONE PROVIDED

First Name Last Name Gretchen Barrera

Title Environmental Director

Organization Name Alabama State Port Authority

Phone Type Number Extension

Business 2514417086

Email gretchen.barrera@alports.com

Address

PO Box 1588

Mobile, Mobile County 36633

Fees Assessed

The following itemized fees have been assessed in accordance with Fee Schedule D and 335-1-6-.04(a) of ADEM Admin. Code Division 1 regulations based on the information provided in this application.

If the correct fees are not displayed, please contact your permit engineer PRIOR to submitting the form. Do NOT answer questions erroneously in order to have the correct fee assessed.

Mineral/Resource Extraction Mining, Storage Transloading, Dry Processing: 5820

Biomonitoring & Toxicity Limits: 1015

Fee

Fee 6835

SUBMISSION AGREEMENTS

- 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.

Professional Engineer (PE)

7

A detailed, comprehensive Pollution Abatement & Prevention (PAP) Plan must be prepared, signed, and certified by a professional engineer (PE), registered in the State of Alabama, and the PE must certify as follows: I certify under penalty of lawthat the technical information and data contained in this application, and a comprehensive Pollution Abatement & Prevention (PAP) Plan, including any attached SPCC plan, maps, engineering designs, etc. acceptable to ADEM, for the prevention and minimization of all sources of pollution in stormwater and authorized related process wastewater runoff has been prepared under my supervision for this facility utilizing effective, good engineering and pollution control practices and in accordance with the provisions of this Permit, and ADEM Admin. Code Division 335-6, including Chapter 335-6-9 and Appendices A & B. If the PAP Plan is properly implemented and maintained by the Permittee, discharges of pollutants can reasonably be expected to be effectively minimized to the maximum extent practicable and according to permit discharge limitations and other permit requirements. The applicant has been advised that appropriate pollution abatement/prevention facilities and structural & nonstructural management practices or Department approved equivalent management practices as detailed in the PAP Plan must be fully implemented and regularly maintained as needed at the facility in accordance with good sediment, erosion, and other pollution control practices, permit requirements, and other ADEM requirements to ensure protection of groundwater and surface water quality.

Signed By Brad Newton on 03/24/2023 at 5:54 PM

Responsible Official

This application must be signed and initialed by a Responsible Official of the applicant pursuant to ADEM Admin. Code Rule 335-6-6-.09 who has overall responsibility for the operation of the facility. I certify under penalty of lawthat this document, including technical information and data, the PAP Plan, including any SPCC plan, maps, engineering designs, and all other attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel property gathered and evaluated the information submitted. Based on my inquiry of the PE and other person or persons under my supervision 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 or imprisonment for knowing violations. A comprehensive PAP Plan to prevent and minimize discharges of pollution to the maximum extent practicable has been prepared at my direction by a PE for this facility utilizing effective, good engineering and pollution control practices and in accordance with the provisions of ADEM Admin. Code Division 335-6, including Chapter 335-6-9 and Appendices A & B, and information contained in this application, including any attachments. I understand that regular inspections must be performed by, or under the direct supervision of, a PE and all appropriate pollution abatement/prevention facilities and structural & nonstructural management practices or Department approved equivalent management practices identified by the PE must be fully implemented prior to and concurrent with commencement of regulated activities and regularly maintained as needed at the facility in accordance with good sediment, erosion, and other pollution control practices and ADEM requirements. I understand that the PAP Plan must be fully implemented and regularly maintained so that discharges of pollutants can reasonably be expected to be effectively minimized to the maximum extent practicable and according to permit discharge limitations and other requirements to ensure protection of groundwater and surface water quality. I understand that failure to fully implement and regularly maintain required management practices for the protection of groundwater and surface water quality may subject the is consistent in format and identical in content to the ADEM approved form. . . . described in this application have been tested or evaluated for the presence of non-stormwater discharges and any nonmining associated beneficiation/process pollutants and wastewaters have been fully identified. . understanding that I may be required to obtain a permit from the ADOL. I acknowledge my understanding that if the proposed activities will be conducted in or potentially impact waters of the state or waters of the US (including wetlands). that I may be required to obtain a permit from the USACE.

Signed By Richard Clark on 03/24/2023 at 4:36 PM

The applicant is required to supply the following information separately for every proposed (P) or existing (E) outfall. List expected average daily discharge flow rate in cfs and gpd; frequency of discharge in hours per day and days per month; average summer and winter temperature of discharge(s) in degrees centigrade; average pH in standard units; and average daily discharges in pounds per day of BOD5, Total Suspended Solids, Total Iron, Total Manganese, and Total Aluminum (if bauxite or bauxitic clay or if otherwise believed present):

Outfall E/P	Information Source -	Flow	Flow	Frequency	Frequency	Sum/Win	pH (s.u.)	BOD5	TSS	Tot Fe	Tot Mn	Tot Al
	# of Samples	(cfs)	(gpd)	(hours/day)	(days/month)	Temp, (°C)		(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)
001E	2020, 2021 - 48 samples	0.11	71070	10	5	28/16	7.2		3.3	0.1	0.1	

The applicant is required to supply outfall number(s) as it appears on the map(s) required by this application [if this application is for a modification to an existing permit do not change the numbering sequence of the permitted outfalls], describe each, (e.g., pipe, spillway, channel, tunnel, conduit, well, discrete fissure, or container), and identify the origin of pollutants. The response must be precise for each outfall. If the discharge of pollutants from any outfall is the result of commingling of waste streams from different origins, each origin must be completely described.

Description of Origin of Pollutants – typical examples: (1) Discharge of drainage from the underground workings of an underground coal mine, (2) Discharge of drainage from a coal surface mine, (3) Discharge of drainage from a coal preparation plant and associated areas, (4) Discharge of process wastewater from a gravel-washing plant, (5) Discharge of wastewater from an existing source coal preparation plant, (6) Discharge of drainage from a sand and gravel pit, (7) Pumped discharge from a limestone quarry, (8) Controlled surface mine drainage (pumped or siphoned), (9) Discharge of drainage from mine reclamation, (10) Other (please describe):

Outfall	Discharge structure Description	Description of Origin of pollutants	Surface Discharge	Groundwater Discharge	Wet Prep -Other Production Plant	Pumped or Controlled Discharge	Low Volume STP
	1 pipe	Other: coal transloading op	Yes				

The applicant is required to supply the following information separately for every proposed or existing outfall. Identify and list expected average daily discharge of any other pollutant(s) listed in EPA Form 2C Tables A, B, C, D, and E that are not referenced in Part XVI.B. or otherwise submitted elsewhere, that you know is present or have reason to believe could be present in the discharge(s) at levels of concern:

Outfall E/P	Reason Believed Present	Information Source - # of Samples					11 / 1			
		1	lbs/day	mg/L	lbs/day	mg/L	lbs/day	mg/L	lbs/day	mg/L
001E	None to report									







Site and Drainage Plan

Pump Station

TE

Legend

11

Tract 3 A

Stormwater Force Main

Stormwater Gravity Line

Stormwater Inlets

Stormwater Pump Station

0 Stormwater Discharge

0

Esri, HERE, Garmin, iPC, Maxar

___.

TT

1 75

THE - ALEST



Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Doug Otto Alabama State Docks PO BOX 1588 Mobile, Alabama 36633 Generated 3/14/2025 5:23:09 PM

JOB DESCRIPTION

McDuffie Coal Terminal 2C

JOB NUMBER

400-270993-1

Eurofins Pensacola 3355 McLemore Drive Pensacola FL 32514







Eurofins Pensacola

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

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Authorization

Authorized for release by Taylor Bruzzio, Project Manager I <u>Taylor.Bruzzio@et.eurofinsus.com</u> Designee for Isabel Enfinger, Project Manager I <u>isabel.enfinger@et.eurofinsus.com</u> (850)471-6237 Generated

3/14/2025 5:23:09 PM

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Job ID: 400-270993-1

Eurofins Pensacola

Job Narrative 400-270993-1

Receipt

The sample was received on 2/14/2025 3:30 PM. Unless otherwise noted below, the sample arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 4.3° C.

HPLC/IC

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

Metals

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

General Chemistry

Method SM 5540C: The matrix spike / matrix spike duplicate (MS/MSD) recoveries for analytical batch 400-699523 were outside control limits for one or more analytes. See QC Sample Results for detail. Sample matrix interference and/or non-homogeneity are suspected because the associated laboratory control sample (LCS) recovery is within acceptance limits.

Method SM 9222D: The results for the following sample was outside the ideal range of 20-60 colonies per plate as defined by Standard Methods 9222D: 01 (400-270993-1). The colonies were clearly readable; therefore, the results have been reported.

Method 405.1: The USB dilution water D.O. depletion was greater than 0.2 mg/L. The associated sample results in batch 400-699444 are qualified and reported. USB reported at 0.475 mg/L.

Method 375.4: The following sample was diluted to bring the concentration of target analytes within the calibration range: 01 (400-270993-1). Elevated reporting limits (RLs) are provided.

Method SM 4500 SO3 B: This analysis is normally performed in the field and has a method-defined holding time of 15 minutes. The following sample has been qualified with the "HF" flag to indicate analysis was performed in the laboratory outside the 15 minute timeframe: 01 (400-270993-1).

No additional analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

Organic Prep

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Client Sample ID: 01

Lab Sample ID: 400-270993-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Barium	64		10		ug/L	1	_	200.7 Rev 4.4	Total
									Recoverable
Iron	110		100		ug/L	1		200.7 Rev 4.4	Total
									Recoverable
Magnesium	12000		500		ug/L	1		200.7 Rev 4.4	Total
									Recoverable
Manganese	90		10		ug/L	1		200.7 Rev 4.4	Total
									Recoverable
Zinc	32		20		ug/L	1		200.7 Rev 4.4	Total
									Recoverable
рН	7.6	HF			SU	1		150.1	Total/NA
Temperature	21.7	HF			Degrees C	1		150.1	Total/NA
Nitrate Nitrite as N	0.18		0.050		mg/L	1		353.2	Total/NA
Sulfate	130		25		mg/L	5		375.4	Total/NA
Total Organic Carbon	2.0		1.0		mg/L	1		415.1	Total/NA
pH at time of analysis	6.4		0.010		SU	1		SM 2120B	Total/NA
Methylene Blue Active Substances	0.22	F1	0.10		mg/I LAS MW 340	1		SM 5540C	Total/NA
Coliform, Fecal	56		4.0		CFU/100mL	1		SM 9222D	Total/NA

Sample Summary

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
400-270993-1	01	Water	02/14/25 10:00	02/14/25 15:30

Lab Sample ID: 400-270993-1

Matrix: Water

5

6

Date Collected: 02/14/25 10:00 Date Received: 02/14/25 15:30

Client Sample ID: 01

Method: EPA 300.0 - Anions, Ion Chromatography									
Analyte	Result Qualifier	RL	MDL Unit	D	Prepared	Analyzed	Dil Fac		
Bromide	<1.0	1.0	mg/L			02/18/25 21:59	1		
Fluoride	<1.0	1.0	mg/L			02/18/25 21:59	1		

Method: EPA 200.7 Rev 4.4 - Metals (ICP) - Total Recoverable

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aluminum	<200		200		ug/L		02/19/25 05:44	02/19/25 17:25	1
Antimony	<20		20		ug/L		02/19/25 05:44	02/19/25 17:25	1
Arsenic	<20		20		ug/L		02/19/25 05:44	02/19/25 17:25	1
Barium	64		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Beryllium	<4.0		4.0		ug/L		02/19/25 05:44	02/19/25 17:25	1
Boron	<100		100		ug/L		02/19/25 05:44	02/19/25 17:25	1
Cadmium	<5.0		5.0		ug/L		02/19/25 05:44	02/19/25 17:25	1
Chromium	<10		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Cobalt	<10		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Copper	<20		20		ug/L		02/19/25 05:44	02/19/25 17:25	1
Iron	110		100		ug/L		02/19/25 05:44	02/19/25 17:25	1
Lead	<10		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Magnesium	12000		500		ug/L		02/19/25 05:44	02/19/25 17:25	1
Manganese	90		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Molybdenum	<10		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Nickel	<40		40		ug/L		02/19/25 05:44	02/19/25 17:25	1
Selenium	<20		20		ug/L		02/19/25 05:44	02/19/25 17:25	1
Silver	<10		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Thallium	<25		25		ug/L		02/19/25 05:44	02/19/25 17:25	1
Tin	<50		50		ug/L		02/19/25 05:44	02/19/25 17:25	1
Titanium	<10		10		ug/L		02/19/25 05:44	02/19/25 17:25	1
Zinc	32		20		ug/L		02/19/25 05:44	02/19/25 17:25	1

Welliou. EFA 245.1-1554 (\5.0 - Wel	cury (CVAA)								
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	<0.20		0.20		ug/L		02/19/25 12:35	02/19/25 17:25	1

General Chemistry									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH (EPA 150.1)	7.6	HF			SU			02/18/25 01:42	1
Temperature (EPA 150.1)	21.7	HF			Degrees C			02/18/25 01:42	1
Total Suspended Solids (EPA 160.2)	<2.5		2.5		mg/L			02/20/25 15:14	1
Oil & Grease (1664B)	<3.9		3.9		mg/L		03/14/25 11:41	03/14/25 14:56	1
Cyanide, Total (EPA 335.2)	<0.0050		0.0050		mg/L		02/21/25 09:53	02/21/25 14:21	1
Ammonia (EPA 350.1)	<0.050		0.050		mg/L			02/19/25 13:19	1
Nitrate Nitrite as N (EPA 353.2)	0.18		0.050		mg/L			02/21/25 12:55	1
Phosphorus, Total (EPA 365.4)	<100		100		ug/L		02/17/25 15:22	02/18/25 16:45	1
Sulfate (EPA 375.4)	130		25		mg/L			03/12/25 13:10	5
Sulfide (EPA 376.2)	<0.10		0.10		mg/L			02/18/25 13:47	1
Biochemical Oxygen Demand (EPA 405.1)	<2.0		2.0		mg/L			02/14/25 18:16	1
Chemical Oxygen Demand (EPA 410.4)	<10		10		mg/L			03/10/25 10:43	1
Total Organic Carbon (EPA 415.1)	2.0		1.0		mg/L			02/20/25 21:45	1
Phenols, Total (EPA 420.4)	<0.0050		0.0050		mg/L			02/21/25 13:26	1
Sulfite (SM 4500 SO3 B-2011)	<2.0	HF	2.0		mg/L			02/24/25 18:00	1

Eurofins Pensacola

RL

0.50

5.0

0.010

0.10

0.10

0.10

RL

4.0

MDL Unit

mg/L

SU

mg/L

mg/L

340

MDL Unit

Color Units

mg/I LAS MW

CFU/100mL

D

D

Prepared

Prepared

Result Qualifier

<0.50

<5.0

6.4

<0.10 HF

<0.10 HF

0.22 F1

Result Qualifier

56

Client Sample ID: 01 Date Collected: 02/14/25 10:00

Analyte

G)

Analyte

Coliform, Fecal

Color (SM 2120B)

Date Received: 02/14/25 15:30

General Chemistry (Continued)

Nitrogen, Organic (EPA Nitrogen, Org)

pH at time of analysis (SM 2120B)

Chlorine, Total Residual (SM 4500 Cl

Method: SM 9222D - Coliforms, Fecal (Membrane Filter)

Chlorine, free (SM 4500 CI G)

Methylene Blue Active

Substances (SM 5540C)

Job ID: 400-270993-1

Lab Sample ID: 400-270993-1 Matrix: Water

Analyzed

02/24/25 11:44

02/15/25 13:12

02/15/25 13:12

02/28/25 12:57

02/28/25 12:57

02/16/25 09:42

Analyzed

02/14/25 17:51

 J93-1
 3

 Water
 4

 Dil Fac
 5

 1
 6

1

1

1

1

1

Dil Fac

Eurofins Pensacola

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Qualifiers

Quanters		
Metals		
Qualifier	Qualifier Description	
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.	
General Che	mistry	5
Qualifier	Qualifier Description	
F1	MS and/or MSD recovery exceeds control limits.	
HF	Parameter with a holding time of 15 minutes. Test performed by laboratory at client's request. Sample was analyzed outside of hold time.	_
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.	7
Glossary		0
Abbreviation	These commonly used abbreviations may or may not be present in this report.	0
¢	Listed under the "D" column to designate that the result is reported on a dry weight basis	Q
%R	Percent Recovery	3
CFL	Contains Free Liquid	
CFU	Colony Forming Unit	
CNF	Contains No Free Liquid	
DER	Duplicate Error Ratio (normalized absolute difference)	
Dil Fac	Dilution Factor	

DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)

Limit of Detection (DoD/DOE) LOD Limit of Quantitation (DoD/DOE) LOQ

MCL EPA recommended "Maximum Contaminant Level"

MDA Minimum Detectable Activity (Radiochemistry) MDC Minimum Detectable Concentration (Radiochemistry)

MDL Method Detection Limit

ML Minimum Level (Dioxin)

MPN Most Probable Number

MQL Method Quantitation Limit

NC Not Calculated

ND Not Detected at the reporting limit (or MDL or EDL if shown)

NEG Negative / Absent POS Positive / Present

PQL Practical Quantitation Limit

PRES Presumptive

QC Quality Control

RER Relative Error Ratio (Radiochemistry)

Reporting Limit or Requested Limit (Radiochemistry) RL

RPD Relative Percent Difference, a measure of the relative difference between two points

TEF Toxicity Equivalent Factor (Dioxin)

TEQ Toxicity Equivalent Quotient (Dioxin)

TNTC Too Numerous To Count

QC Association Summary

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

HPLC/IC

Analysis Batch: 699944

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	300.0	
MB 400-699944/7	Method Blank	Total/NA	Water	300.0	
LCS 400-699944/8	Lab Control Sample	Total/NA	Water	300.0	
LCSD 400-699944/9	Lab Control Sample Dup	Total/NA	Water	300.0	

Metals

Prep Batch: 876248

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total Recoverable	Water	200.7-1994 R4.4	
MB 680-876248/1-A	Method Blank	Total Recoverable	Water	200.7-1994 R4.4	
LCS 680-876248/2-A	Lab Control Sample	Total Recoverable	Water	200.7-1994 R4.4	
rep Batch: 876346					
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
•	Client Sample ID 01	Prep Type Total/NA	Matrix Water	Method 245.1	Prep Batch
Lab Sample ID 400-270993-1 MB 680-876346/1-A	·	· •·			Prep Batch
400-270993-1	01	Total/NA	Water	245.1	Prep Batch

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch	
400-270993-1	01	Total/NA	Water	245.1-1994 R3.0	876346	
MB 680-876346/1-A	Method Blank	Total/NA	Water	245.1-1994 R3.0	876346	
LCS 680-876346/2-A	Lab Control Sample	Total/NA	Water	245.1-1994 R3.0	876346	
LLCS 680-876346/3-A	Lab Control Sample	Total/NA	Water	245.1-1994 R3.0	876346	

Analysis Batch: 876463

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total Recoverable	Water	200.7 Rev 4.4	876248
MB 680-876248/1-A	Method Blank	Total Recoverable	Water	200.7 Rev 4.4	876248
LCS 680-876248/2-A	Lab Control Sample	Total Recoverable	Water	200.7 Rev 4.4	876248

General Chemistry

Analysis Batch: 38116

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	4500 SO3	
				B-2011	
MB 705-38116/1	Method Blank	Total/NA	Water	4500 SO3	
				B-2011	
LCS 705-38116/2	Lab Control Sample	Total/NA	Water	4500 SO3	
				B-2011	
400-270993-1 MS	01	Total/NA	Water	4500 SO3	
				B-2011	
400-270993-1 MSD	01	Total/NA	Water	4500 SO3	
				B-2011	

Analysis Batch: 699444

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	405.1	
USB 400-699444/1	Method Blank	Total/NA	Water	405.1	
LCS 400-699444/2	Lab Control Sample	Total/NA	Water	405.1	

QC Association Summary

Prep Type

Total/NA

Total/NA

Total/NA

Client Sample ID

Lab Control Sample

Method Blank

01

General Chemistry Analysis Batch: 699497

Lab Sample ID

MB 400-699497/1

LCS 400-699497/3

400-270993-1

Prep Batch

Prep Batch

Method

SM 2120B

SM 2120B

SM 2120B

Matrix

Water

Water

Water

8 9 10 11

 Prep Batch
 12

 13
 14

Prep Batch

Prep Batch

Prep Batch

699619

699619

699619

Prep Batch

Prep Batch

LCS 400-699497/3	Lab Control Sample	Iotal/INA	vvater	SM 2120B
400-270993-1 DU	01	Total/NA	Water	SM 2120B
Analysis Batch: 69952	3			
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method
400-270993-1	01	Total/NA	Water	SM 5540C
MB 400-699523/3	Method Blank	Total/NA	Water	SM 5540C
LCS 400-699523/4	Lab Control Sample	Total/NA	Water	SM 5540C
MRL 400-699523/5	Lab Control Sample	Total/NA	Water	SM 5540C
400-270993-1 MS	01	Total/NA	Water	SM 5540C
400-270993-1 MSD	01	Total/NA	Water	SM 5540C
Prep Batch: 699619				
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method
400-270993-1	01	Total/NA	Water	365.2/365.3/365
MB 400-699619/1-A	Method Blank	Total/NA	Water	365.2/365.3/365
LCS 400-699619/2-A	Lab Control Sample	Total/NA	Water	365.2/365.3/365
- Analysis Batch: 69967	5			
_ Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method
400-270993-1	01	Total/NA	Water	376.2
MB 400-699675/3	Method Blank	Total/NA	Water	376.2
LCS 400-699675/4	Lab Control Sample	Total/NA	Water	376.2
MRL 400-699675/2	Lab Control Sample	Total/NA	Water	376.2
- Analysis Batch: 69977	6			
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method
400-270993-1	01	Total/NA	Water	150.1
LCS 400-699776/4	Lab Control Sample	Total/NA	Water	150.1
Analysis Batch: 69984	9			
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method
400-270993-1	01	Total/NA	Water	365.4
MB 400-699619/1-A	Method Blank	Total/NA	Water	365.4
LCS 400-699619/2-A	Lab Control Sample	Total/NA	Water	365.4
MRL 400-699849/14	Lab Control Sample	Total/NA	Water	365.4
Analysis Batch: 69990	6			
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method
400-270993-1	01	Total/NA	Water	350.1
MB 400-699906/19		T (1/616	Water	350.1
	Method Blank	Total/NA		000.1
LCS 400-699906/20	Method Blank Lab Control Sample	Total/NA Total/NA	Water	350.1
LCS 400-699906/20 MRL 400-699906/13				
MRL 400-699906/13	Lab Control Sample Lab Control Sample	Total/NA	Water	350.1
MRL 400-699906/13 Analysis Batch: 70011 Lab Sample ID	Lab Control Sample Lab Control Sample	Total/NA	Water	350.1
MRL 400-699906/13 Analysis Batch: 70011	Lab Control Sample Lab Control Sample 5	Total/NA Total/NA	Water Water	350.1 350.1
MRL 400-699906/13 Analysis Batch: 70011 Lab Sample ID	Lab Control Sample Lab Control Sample 5 Client Sample ID	Total/NA Total/NA Prep Type	Water Water Matrix	350.1 350.1 <u>Method</u>

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Prep Type

Total/NA

Matrix

Water

Method

415.1

Client Sample ID

01

General Chemistry Analysis Batch: 700179

Lab Sample ID

400-270993-1

Prep Batch

Lab Sample ID 400-270993-1	Client Sample ID 01	Total/NA	Water	Nitrogen,Org	
	Olivert Overselv ID	Prep Type	Matrix	Method	Prep Batch
Analysis Batch: 70039)				
MRL 400-700255/29	Lab Control Sample	Total/NA	Water	353.2	
LCS 400-700255/28	Lab Control Sample	Total/NA	Water	353.2	
MB 400-700255/27	Method Blank	Total/NA	Water	353.2	
400-270993-1	01 Mathead Diants	Total/NA	Water	353.2	
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
nalysis Batch: 70025					
MRL 400-700249/14	Lab Control Sample	Total/NA	Water	335.2	
LCS 400-700199/2-A	Lab Control Sample	Total/NA	Water	335.2	700199
MB 400-700199/1-A	Method Blank	Total/NA	Water	335.2	700199
400-270993-1	01	Total/NA	Water	335.2	700199
Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
nalysis Batch: 70024)				
		Iotai/INA	Water	420.4	
400-270993-1 MS 400-270993-1 MSD	01	Total/NA	Water	420.4	
400-270993-1 MS	01	Total/NA	Water	420.4	
MRL 400-700241/20	Lab Control Sample	Total/NA	Water	420.4	
LCS 400-700241/19	Lab Control Sample	Total/NA	Water	420.4	
MB 400-700241/19	Method Blank	Total/NA	Water	420.4	
Lab Sample ID 400-270993-1	Client Sample ID	Total/NA	Matrix Water	<u>Method</u> 420.4	Prep Batch
nalysis Batch: 70024		Dean Tim-	Meduix	Mathad	Dren D-4-b
			vvater	Distil/ON	
LCS 400-700199/1-A	Lab Control Sample	Total/NA	Water	Distill/CN	
MB 400-700199/1-A	Method Blank	Total/NA	Water	Distill/CN	
Lab Sample ID 400-270993-1	Client Sample ID	Prep Type Total/NA	Matrix Water	Method Distill/CN	Prep Batch
Prep Batch: 700199					
400-270993-1 MSD	01	Total/NA	Water	415.1	
400-270993-1 MS	01	Total/NA	Water	415.1	
MRL 400-700179/6	Lab Control Sample	Total/NA	Water	415.1	
LCSD 400-700179/41	Lab Control Sample Dup	Total/NA	Water	415.1	
LCSD 400-700179/10	Lab Control Sample Dup	Total/NA	Water	415.1	
LCS 400-700179/9	Lab Control Sample	Total/NA	Water	415.1	
LCS 400-700179/40	Lab Control Sample	Total/NA	Water	415.1	
MB 400-700179/7	Method Blank	Total/NA	Water	415.1	
MB 400-700179/39	Method Blank	Total/NA	Water	415.1	

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	SM 4500 CI G	
MB 400-700927/4	Method Blank	Total/NA	Water	SM 4500 CI G	
LCS 400-700927/5	Lab Control Sample	Total/NA	Water	SM 4500 CI G	
LCSD 400-700927/6	Lab Control Sample Dup	Total/NA	Water	SM 4500 CI G	
MRL 400-700927/3	Lab Control Sample	Total/NA	Water	SM 4500 CI G	

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General Chemistry (Continued)

Analysis Batch: 700927 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
400-270993-1 DU	01	Total/NA	Water	SM 4500 CI G	
nalysis Batch: 70173	3				
Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	410.4	
MB 400-701733/5	Method Blank	Total/NA	Water	410.4	
LCS 400-701733/6	Lab Control Sample	Total/NA	Water	410.4	
MRL 400-701733/7	Lab Control Sample	Total/NA	Water	410.4	
nalysis Batch: 70205	4				
Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	375.4	
MB 400-702054/12	Method Blank	Total/NA	Water	375.4	
LCS 400-702054/13	Lab Control Sample	Total/NA	Water	375.4	
MRL 400-702054/14	Lab Control Sample	Total/NA	Water	375.4	
rep Batch: 702291					
Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	1664B	
MB 400-702291/1-A	Method Blank	Total/NA	Water	1664B	
LCS 400-702291/2-A	Lab Control Sample	Total/NA	Water	1664B	
nalysis Batch: 70233	7				
l ek Comula ID	Client Comple ID	Dren Turne	Mateix	Mathad	Dren Detel

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	1664B	702291
MB 400-702291/1-A	Method Blank	Total/NA	Water	1664B	702291
LCS 400-702291/2-A	Lab Control Sample	Total/NA	Water	1664B	702291

Biology

Analysis Batch: 699507

Lab Sample ID	Client Sample ID	Ргер Туре	Matrix	Method Prep Batch
400-270993-1	01	Total/NA	Water	SM 9222D
MB 400-699507/1	Method Blank	Total/NA	Water	SM 9222D
LCS 400-699507/2	Lab Control Sample	Total/NA	Water	SM 9222D
400-270993-1 DU	01	Total/NA	Water	SM 9222D

RL

1.0

1.0

Spike

Added

10.0

10.0

MDL Unit

LCS LCS

9.73

10.0

Result Qualifier

mg/L

mg/L

Unit

mg/L

mg/L

D

Prepared

Lab Sample ID: MB 400-699944/7

Lab Sample ID: LCS 400-699944/8

Lab Sample ID: LCSD 400-699944/9

Matrix: Water

Matrix: Water

Matrix: Water

Analyte

Bromide

Fluoride

Analyte

Bromide

Fluoride

Analysis Batch: 699944

Analysis Batch: 699944

Analysis Batch: 699944

Method: 300.0 - Anions, Ion Chromatography

MB MB

<1.0

<1.0

Result Qualifier

Prep Type: Total/NA

Prep Type: Total/NA

Client Sample ID: Method Blank

Analyzed

02/18/25 19:51

02/18/25 19:51

Client Sample ID: Lab Control Sample

%Rec

Limits

90 - 110

90 - 110

Dil Fac

1

1

9 Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

%Rec

97

100

D

	Spike	LCSD	LCSD				%Rec		RPD
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit
Bromide	10.0	9.82		mg/L		98	90 - 110	1	15
Fluoride	10.0	9.93		mg/L		99	90 - 110	1	15
<u> </u>									

Method: 200.7 Rev 4.4 - Metals (ICP)

Lab Sample ID: MB 680-876248/1-A Matrix: Water Analysis Batch: 876463					Client Sample ID: Method Blank Prep Type: Total Recoverable Prep Batch: 876248		
	MB MB						
Analyte	Result Qualifier	RL	MDL Unit	D	Prepared	Analyzed	Dil Fac
Aluminum	<200	200	ug/L		02/19/25 05:44	02/20/25 09:05	1
Antimony	<20	20	ug/L		02/19/25 05:44	02/20/25 09:05	1
Arsenic	<20	20	ug/L		02/19/25 05:44	02/20/25 09:05	1
Barium	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Beryllium	<4.0	4.0	ug/L		02/19/25 05:44	02/20/25 09:05	1
Boron	<100	100	ug/L		02/19/25 05:44	02/20/25 09:05	1
Cadmium	<5.0	5.0	ug/L		02/19/25 05:44	02/20/25 09:05	1
Chromium	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Cobalt	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Copper	<20	20	ug/L		02/19/25 05:44	02/20/25 09:05	1
Iron	<100	100	ug/L		02/19/25 05:44	02/20/25 09:05	1
Lead	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Magnesium	<500	500	ug/L		02/19/25 05:44	02/20/25 09:05	1
Manganese	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Molybdenum	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Nickel	<40	40	ug/L		02/19/25 05:44	02/20/25 09:05	1
Selenium	<20	20	ug/L		02/19/25 05:44	02/20/25 09:05	1
Silver	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Thallium	<25	25	ug/L		02/19/25 05:44	02/20/25 09:05	1
Tin	<50	50	ug/L		02/19/25 05:44	02/20/25 09:05	1
Titanium	<10	10	ug/L		02/19/25 05:44	02/20/25 09:05	1
Zinc	<20	20	ug/L		02/19/25 05:44	02/20/25 09:05	1

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Client Sample I
Data Tana Ta
Method: 200.7 Rev 4.4 - Metals (ICP) (Continued)

Lab Sample ID: LCS 680-876248/2-A Matrix: Water					Client		ID: Lab Control Sam Type: Total Recovera	-
Analysis Batch: 876463							Prep Batch: 876	
	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Aluminum	5000	5160		ug/L		103	85 - 115	_
Antimony	50.0	53.3		ug/L		107	85 - 115	
Arsenic	100	101		ug/L		101	85 - 115	
Barium	100	107		ug/L		107	85 - 115	
Beryllium	50.0	53.9		ug/L		108	85 - 115	
Boron	400	374		ug/L		94	85 - 115	
Cadmium	50.0	55.0		ug/L		110	85 - 115	· ·
Chromium	100	106		ug/L		106	85 - 115	
Cobalt	50.0	53.7		ug/L		107	85 - 115	
Copper	101	105		ug/L		104	85 - 115	
Iron	5000	5340		ug/L		107	85 - 115	
Lead	500	539		ug/L		108	85 - 115	
Magnesium	5000	5310		ug/L		106	85 - 115	
Manganese	400	422		ug/L		105	85 - 115	
Molybdenum	100	104		ug/L		104	85 - 115	
Nickel	100	110		ug/L		110	85 - 115	
Selenium	100	109		ug/L		109	85 - 115	
Silver	50.0	50.0		ug/L		100	85 - 115	
Thallium	50.0	55.5		ug/L		111	85 - 115	
Tin	100	106		ug/L		106	85 - 115	
Titanium	50.0	52.2		ug/L		104	85 - 115	
Zinc	100	104		ug/L		104	85 - 115	

Method: 245.1-1994 R3.0 - Mercury (CVAA)

											Client Sa	ample ID: Metho	od Blank
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 876437												Prep Batch	: 876346
-	МВ	МВ										-	
Analyte	Result	Qualifier		RL		MDL	Unit		D	Р	repared	Analyzed	Dil Fac
Mercury	<0.20			0.20			ug/L			02/1	9/25 12:35	02/19/25 16:49	1
									CI	lient	Sample	ID: Lab Control	l Sample
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 876437												Prep Batch	: 876346
-			Spike		LCS	LCS						%Rec	
Analyte			Added		Result	Qual	ifier	Unit		D	%Rec	Limits	
Mercury			2.50		2.57			ug/L		_	103	85 - 115	
									CI	lient	Sample	ID: Lab Control	l Sample
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 876437												Prep Batch	: 876346
-			Spike		LLCS	LLCS	6					%Rec	
Analyte			Added		Result	Qual	ifier	Unit		D	%Rec	Limits	
Mercury			0.200		0.196	J		ug/L		_	98	50 - 150	

Job ID: 400-270993-1

Method: 160.2 - Solids, Total Suspended (TSS)

_ Lab Sample ID: MB 400-700115/1 Matrix: Water											Client S	ample ID: Meth Prep Type:	
Analysis Batch: 700115													
-	МВ	МВ											
Analyte	Result	Qualifier		RL		MDL	Unit		D	Ρ	repared	Analyzed	Dil Fac
Total Suspended Solids	<5.0			5.0			mg/L					02/20/25 15:14	1
									С	lient	Sample	ID: Lab Contro	ol Sample
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 700115													
			Spike		LCS	LCS						%Rec	
Analyte			Added		Result	Qua	lifier	Unit		D	%Rec	Limits	
Total Suspended Solids			262		250			mg/L			95	79 - 124	
Method: 1664B - HEM and SGT-H	EM												
_ Lab Sample ID: MB 400-702291/1-A											Client S	ample ID: Meth	od Blank
Matrix: Water												Prep Type:	
Analysis Batch: 702337												Prep Batc	
	мв	мв											
Analyte	Result	Qualifier		RL		MDL	Unit		D	Р	repared	Analyzed	Dil Fac
Oil & Grease	<4.0			4.0			mg/L			03/1	4/25 11:28	03/14/25 14:56	1
_ Lab Sample ID: LCS 400-702291/2-A									c	liont	Sample	ID: Lab Contro	ol Samole
Matrix: Water									Ŭ		Campie	Prep Type:	
Analysis Batch: 702337												Prep Batc	
Analysis Baton. rozoor			Spike		LCS	LCS						%Rec	
Analyte			Added		Result	Qual	lifier	Unit		D	%Rec	Limits	
Oil & Grease			40.0		36.60			mg/L			92	78 - 114	
Method: 335.2 - Cyanide, Total													
 Lab Sample ID: MB 400-700199/1-A											Client S	ample ID: Meth	od Blank
Matrix: Water												Prep Type	
Analysis Batch: 700249												Prep Batc	
	МВ	МВ											
Analyte	Result	Qualifier		RL		MDL	Unit		D	Р	repared	Analyzed	Dil Fac
Cyanide, Total	<0.0050		0.0	0050			mg/L			02/2	1/25 09:52		1
_ Lab Sample ID: LCS 400-700199/2-A									С	lient	Sample	ID: Lab Contro	ol Sample
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 700249												Prep Batc	h: 700199
			Spike		LCS	LCS						%Rec	
Analyte			Added		Result	Qua	lifier	Unit		D	%Rec	Limits	
Cyanide, Total			0.127		0.133			mg/L			105	75 - 125	
Lab Sample ID: MRL 400-700249/14									С	lient	Sample	ID: Lab Contro	ol Sample
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 700249													
			Spike		MRL	MRL						%Rec	
Analyte			Added		Result	Qual	lifier	Unit		D	%Rec	Limits	
Cyanide, Total			0.00400		0.00311			mg/L			78	50 - 150	

Method: 350.1 - Nitrogen, Ammonia

Lab Sample ID: MB 400-699906/19											Client S	ample ID: Meth	od Blank
Matrix: Water												Prep Type:	
Analysis Batch: 699906													
	МВ	МВ											
Analyte	Result	Qualifier		RL		MDL	Unit		D	Pi	repared	Analyzed	Dil Fac
Ammonia	<0.050			0.050			mg/L					02/19/25 13:18	1
-													
Lab Sample ID: LCS 400-699906/20									Clie	ent	Sample	ID: Lab Contro	I Sample
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 699906													
			Spike		LCS	LCS						%Rec	
Analyte			Added		Result	Qua	lifier	Unit		D	%Rec	Limits	
Ammonia			3.00		3.00			mg/L		_	100	90 - 110	
Lab Sample ID: MRL 400-699906/13									Clie	ent	Sample	ID: Lab Contro	
Matrix: Water												Prep Type:	Total/NA
Analysis Batch: 699906													
			Spike			MRL						%Rec	
Analyte			Added		Result	Qua	lifier	Unit		D	%Rec	Limits	
Ammonia			0.0500		0.0660			mg/L			132	50 - 150	
/lethod: 353.2 - Nitrogen, Nitrate-I	Nitrite												
······································													
Lab Sample ID: MB 400-700255/27											Client S	ample ID: Meth	od Blank
												D	Tetel/NIA
Matrix: Water												Prep Type:	Total/NA
Matrix: Water Analysis Batch: 700255												Prep Type:	Total/NA
	МВ	МВ										Prep Type:	Total/NA
		MB Qualifier		RL		MDL	Unit		D	Pı	repared	Analyzed	
Analysis Batch: 700255				RL 0.050		MDL	Unit mg/L		<u>D</u>	Pi	epared		Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N	Result					MDL						Analyzed 02/21/25 12:09	_ Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28	Result					MDL						Analyzed 02/21/25 12:09	Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water	Result					MDL						Analyzed 02/21/25 12:09	Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28	Result						mg/L					Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type:	Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255	Result		Spike			LCS	mg/L		Clie	ent	Sample	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec	Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte	Result		Added		Result	LCS	mg/L	Unit	Clie		Sample	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits	Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255	Result		-			LCS	mg/L	Unit mg/L	Clie	ent	Sample	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec	Dil Fac
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N	Result		Added		Result	LCS	mg/L		Clie	ent D	Sample %Rec 96	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110	Dil Fac 1 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29	Result		Added		Result	LCS	mg/L		Clie	ent D	Sample %Rec 96	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro	Dil Fac 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water	Result		Added		Result	LCS	mg/L		Clie	ent D	Sample %Rec 96	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110	Dil Fac 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29	Result		Added 1.00		Result 0.964	LCS Qua	mg/L		Clie	ent D	Sample %Rec 96	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type:	Dil Fac 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255	Result		Added 1.00 Spike		Result 0.964	LCS Qual	ifier	mg/L	Clie	ent D ent	Sample %Rec 96 Sample	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec	Dil Fac 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte	Result		Added 1.00 Spike Added		Result 0.964 MRL Result	LCS Qual	ifier	mg/L Unit	Clie	ent D	Sample %Rec 96 Sample %Rec	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits	Dil Fac 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255	Result		Added 1.00 Spike		Result 0.964	LCS Qual	ifier	mg/L	Clie	ent D ent	Sample %Rec 96 Sample	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec	Dil Fac 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N	Result <0.050		Added 1.00 Spike Added		Result 0.964 MRL Result	LCS Qual	ifier	mg/L Unit	Clie	ent D ent	Sample %Rec 96 Sample %Rec	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits	Dil Fac 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Method: 365.4 - Phosphorus, Tota	Result <0.050		Added 1.00 Spike Added		Result 0.964 MRL Result	LCS Qual	ifier	mg/L Unit	Clie	ent ent	Sample %Rec 96 Sample %Rec 126	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits 50 - 150	Dil Fac 1 1 1 Sample Total/NA
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N	Result <0.050		Added 1.00 Spike Added		Result 0.964 MRL Result	LCS Qual	ifier	mg/L Unit	Clic	ent ent	Sample %Rec 96 Sample %Rec 126	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits 50 - 150 ample ID: Meth	- Dil Fac 1 1 1 Sample Total/NA 1 Sample Total/NA
Analysis Batch: 700255 Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analyte Nitrate Nitrite as N Analyte Nitrate Nitrite as N Attrix: Water Lab Sample ID: MB 400-699619/1-A Matrix: Water	Result <0.050		Added 1.00 Spike Added		Result 0.964 MRL Result	LCS Qual	ifier	mg/L Unit	Clic	ent ent	Sample %Rec 96 Sample %Rec 126	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits 50 - 150 ample ID: Meth Prep Type:	Dil Fac 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Method: 365.4 - Phosphorus, Tota Lab Sample ID: MB 400-699619/1-A	Result <0.050		Added 1.00 Spike Added		Result 0.964 MRL Result	LCS Qual	ifier	mg/L Unit	Clic	ent ent	Sample %Rec 96 Sample %Rec 126	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits 50 - 150 ample ID: Meth	Dil Fac 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Analysis Batch: 700255 Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: LCS 400-700255/28 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analysis Batch: 700255 Analyte Nitrate Nitrite as N Lab Sample ID: MRL 400-700255/29 Matrix: Water Analyte Nitrate Nitrite as N Analyte Nitrate Nitrite as N Attrix: Water Lab Sample ID: MB 400-699619/1-A Matrix: Water	Result <0.050	Qualifier	Added 1.00 Spike Added		Result 0.964 MRL Result	LCS Qual MRL Qual	ifier	mg/L Unit	Clic	ent D ent	Sample %Rec 96 Sample %Rec 126	Analyzed 02/21/25 12:09 ID: Lab Contro Prep Type: %Rec Limits 90 - 110 ID: Lab Contro Prep Type: %Rec Limits 50 - 150 ample ID: Meth Prep Type:	Dil Fac 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

3/14/2025

Job ID: 400-270993-1

Sulfide	<0.10			0.10			mg/L				•	02/18/25 13:47	
nalyte		мв Qualifier		RL		MDL	Unit		D	Pi	repared	Analyzed	Dil Fa
Analysis Batch: 699675	мв	MD											
Aatrix: Water												Prep Type:	Total/N
ab Sample ID: MB 400-699675/3											Client S	ample ID: Metho	
cinoa. 070.2 - Gainae													
ethod: 376.2 - Sulfide													
Sulfate			5.00		4.46	J		mg/L		_	89	50 - 150	
nalyte			Added		Result			Unit		D	%Rec	Limits	
Analysis Batch: 702054			Spike		MRI	MRL						%Rec	
Aatrix: Water										ent	Jampie	Prep Type:	
ab Sample ID: MRL 400-702054/14									CII	ont	Sample	ID: Lab Control	Some
Sulfate			15.0		14.5			mg/L		_	96	90 - 110	
nalyte			Added		Result	Qual	ifier	Unit		D	%Rec	Limits	
analysis baten. rozvoz			Spike		LCS	LCS						%Rec	
Natrix: water Analysis Batch: 702054												Fiep type:	iotal/N
.ab Sample ID: LCS 400-702054/13 //atrix: Water									Cli	ent	Sample	ID: Lab Control Prep Type:	
									•		• · ·		
Sulfate	<5.0			5.0			mg/L					03/12/25 11:49	
nalyte		Qualifier		RL		MDL	Unit		D	Pi	repared	Analyzed	Dil Fa
analysis Datch. 702004	мв	мв											
/latrix: Water Analysis Batch: 702054												Prep Type:	Total/N
ab Sample ID: MB 400-702054/12											Client S	ample ID: Metho	
ethod: 375.4 - Sulfate													
Phosphorus, Total			0.100		0.100	Guui		mg/L		_	100	50 - 150	
nalyte			Spike Added		Result	MRL		Unit		D	%Rec	%Rec Limits	
Analysis Batch: 699849			• "									~~=	
Matrix: Water												Prep Type:	Total/N
ab Sample ID: MRL 400-699849/14									Cli	ent	Sample	ID: Lab Control	Samp
			1900		2170			uy/L			110	75-115	
h nalyte			Added 1980		Result 2170	Qual	ifier	Unit ug/L		D	%Rec 110	Limits 75 - 113	
			Spike			LCS				_		%Rec	
Analysis Batch: 699849												Prep Batch	: <mark>69961</mark>
Aatrix: Water												Prep Type:	Total/N

Lab Sample ID: USB 400-699444/1							Client Sa	ample ID: Metho	d Blank
Matrix: Water								Prep Type: 1	Total/NA
Analysis Batch: 699444									
	USB	USB							
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Biochemical Oxygen Demand	<2.0		2.0		mg/L			02/14/25 13:20	1

Method: 405.1 - BOD, 5-Day (Continued)

Lab Sample ID: LCS 400-699444/2									Clie	nt Sample	D: Lab Control	Sample
Matrix: Water											Prep Type:	Total/N/
Analysis Batch: 699444												
-			Spike		LCS	LCS					%Rec	
Analyte			Added		Result	Qual	lifier	Unit	D	%Rec	Limits	
Biochemical Oxygen Demand			198		215			mg/L		109	85 - 115	
lethod: 410.4 - COD												
Lab Sample ID: MB 400-701733/5										Client S	Sample ID: Metho	d Blani
Matrix: Water											Prep Type:	
Analysis Batch: 701733												
	МВ	МВ										
Analyte	Result	Qualifier		RL		MDL	Unit		D	Prepared	Analyzed	Dil Fa
Chemical Oxygen Demand	<10			10			mg/L				03/10/25 10:43	·
Lab Sample ID: LCS 400-701733/6									Clie	at Sample	ID: Lab Control	Sample
Matrix: Water									oner	n Gampie		
											Prep Type:	TOtal/IN/
Analysis Batch: 701733			Spike		1.00	LCS					%Rec	
Analyte			Added		Result		lifior	Unit	D	%Rec	Limits	
Chemical Oxygen Demand					50.8	Qua		mg/L		102	90 - 110	
			50.0		50.0			iiig/L		102	90 - 110	
Lab Sample ID: MRL 400-701733/7									Clie	nt Sample	ID: Lab Control	Sample
Matrix: Water											Prep Type:	Total/N/
Analysis Batch: 701733												
			Spike		MRL	MRL					%Rec	
Analyte			Added		Result	Qual	lifier	Unit	D	%Rec	Limits	_
Chemical Oxygen Demand			10.0		12.3			mg/L		123	50 - 150	
lethod: 415.1 - TOC												
Lab Sample ID: MB 400-700179/39										Client S	Sample ID: Metho	d Blank
Matrix: Water											Prep Type:	Total/N/
Analysis Batch: 700179												
-	MB	МВ										
Analyte	Result	Qualifier		RL		MDL	Unit		D	Prepared	Analyzed	Dil Fa
Total Organic Carbon	<1.0			1.0			mg/L				02/21/25 01:23	
Lab Sample ID: MB 400-700179/7										Client S	Sample ID: Metho	d Blanl
Matrix: Water											Prep Type:	
Analysis Batch: 700179												
	МВ	мв										
									_			

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total Organic Carbon	<1.0		1.0		mg/L			02/20/25 16:49	1
Lab Sample ID: LCS 400-700179/40 Matrix: Water Analysis Batch: 700179						CI	ient Sample	ID: Lab Control Prep Type: 1	
		SI	pike	LCS LCS	i			%Rec	

	Sp	ke LCS	LCS			%Rec	
Analyte	Ado	ed Result	Qualifier	Unit [D %Rec	Limits	
Total Organic Carbon	2	20.7		mg/L	103	85 - 115	

Method: 415.1 - TOC (Continued)

Lab Sample ID: LCS 400-700	JT 79/9						Client	Sample	ID: Lab Co		
Matrix: Water									Prep 1	Type: To	tal/N/
Analysis Batch: 700179											
			Spike		LCS				%Rec		
Analyte			Added		Qualifier	Unit	D	%Rec	Limits		
Total Organic Carbon			20.0	20.4		mg/L		102	85 - 115		
Lab Sample ID: LCSD 400-70	00179/10					Clie	nt Sam	ple ID:	Lab Contro	I Sampl	le Du
Matrix: Water									Prep 1	Type: To	tal/N
Analysis Batch: 700179											
			Spike	LCSD	LCSD				%Rec		RP
Analyte			Added		Qualifier	Unit	D	%Rec	Limits	RPD	Lim
Total Organic Carbon			20.0	20.4		mg/L		102	85 - 115	0	3
Lab Sample ID: LCSD 400-70	00179/41					Clie	nt Sam	ple ID:	Lab Contro	I Sampl	le Du
Matrix: Water										Type: To	
Analysis Batch: 700179											
			Spike	LCSD	LCSD				%Rec		RP
Analyte			Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Lim
Total Organic Carbon			20.0	20.1		mg/L		100	85 - 115	3	3
Lab Sample ID: MRL 400-700	0179/6						Client	Sample	ID: Lab Co	ontrol S	ampl
Matrix: Water										Type: To	
Analysis Batch: 700179											
			Spike	MRL	MRL				%Rec		
Analyte			Added	Result	Qualifier	Unit	D	%Rec	Limits		
Total Organic Carbon			1.00	1.23		mg/L		123	50 - 150		
Lab Sample ID: 400-270993-	1 MS								Client	Sample	ID: 0
Matrix: Water										· Type: To	
Analysis Batch: 700179											
	Sample	Sample	Spike	MS	MS				%Rec		
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	%Rec	Limits		
Total Organic Carbon	2.0		20.0	22.3		mg/L		101	76 - 117		
Lab Sample ID: 400-270993-	1 MSD								Client	Sample	ID: 0
Matrix: Water										ype: To	
Analysis Batch: 700179										,	
	Sample	Sample	Spike	MSD	MSD				%Rec		RPI
Analyte		Qualifier	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Lim
Total Organic Carbon	2.0		20.0	22.2		mg/L		101	76 - 117	0	1

Lab Sample ID: MB 400-700241/19							Client Sa	ample ID: Metho	d Blank
Matrix: Water								Prep Type: 1	Fotal/NA
Analysis Batch: 700241									
	МВ	МВ							
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Phenols, Total	<0.0050		0.0050		mg/L			02/21/25 13:25	1

Method: 420.4 - Phenolics, Total Recoverable (Continued)

Lab Sample ID: LCS 400-700241/20	0						Client	Sample	ID: Lab Cont	
Matrix: Water									Ргер Тур	e: Total/NA
Analysis Batch: 700241			• "							
A h.da			Spike		LCS	11		0/ D	%Rec	
Analyte			Added	Result	Qualifier	Unit	<u> </u>	%Rec	Limits	
Phenols, Total			0.100	0.102		mg/L		102	90 - 110	
Lab Sample ID: MRL 400-700241/1	2						Client	Sample	ID: Lab Cont	rol Sample
Matrix: Water									Prep Typ	e: Total/NA
Analysis Batch: 700241										
			Spike	MRL	MRL				%Rec	
Analyte			Added	Result	Qualifier	Unit	D	%Rec	Limits	
Phenols, Total			0.00500	0.00541		mg/L		108	50 - 150	
Lab Sample ID: 400-270993-1 MS									Client Sa	mple ID: 01
Matrix: Water										e: Total/NA
Analysis Batch: 700241									i icp iyp	c. iotaintr
	Sample	Sample	Spike	MS	MS				%Rec	
Analyte		Qualifier	Added		Qualifier	Unit	D	%Rec	Limits	
Phenols, Total	<0.0050		0.0200	0.0215		mg/L		94	90 - 110	
Lab Sample ID: 400-270993-1 MSD	•									mple ID: 01
Matrix: Water									Prep Typ	e: Total/NA
Analysis Batch: 700241	<u> </u>	<u> </u>	• "							
Analysia	-	Sample	Spike Added		MSD	11		% Dee	%Rec Limits	RPD RPD Limit
Analyte Phenols, Total	<0.0050	Qualifier	0.0200	0.0214	Qualifier	Unit mg/L	<u>D</u>	93	90 - 110	RPD Limit
lethod: 4500 SO3 B-2011 - Su										
-								011-01-0		
								Client S	ample ID: Me	thod Blank
									Drop Typ	o: Total/NA
Matrix: Water									Ргер Тур	e: Total/NA
Matrix: Water		MB MB							Ргер Тур	e: Total/NA
Matrix: Water Analysis Batch: 38116	R	MB MB Result Qualifier		RI	MDI Unit		пр	renared		
Matrix: Water Analysis Batch: 38116 ^{Analyte}	R	MB MB tesult Qualifier		RL	MDL Unit mg/L		<u>D</u> P	repared	Prep Typ 	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite	R	esult Qualifier			MDL Unit mg/L				Analyzed 02/24/25 18:0	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite	R	esult Qualifier							Analyzed 02/24/25 18:0	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water	R	esult Qualifier							Analyzed 02/24/25 18:0	Dil Fac
Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2	R	esult Qualifier		2.0	mg/L				Analyzed 02/24/25 18:0 ID: Lab Cont Prep Typ	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116	R	esult Qualifier	Spike	2.0	LCS		Client	Sample	Analyzed 02/24/25 18:0 ID: Lab Cont Prep Typ %Rec	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116 Analyte	R	esult Qualifier	Spike Added	2.0 LCS Result	mg/L	Unit		Sample	Analyzed 02/24/25 18:0 ID: Lab Cont Prep Typ %Rec Limits	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116 Analyte	R	esult Qualifier	Spike	2.0	LCS	Unit mg/L	Client	Sample	Analyzed 02/24/25 18:0 ID: Lab Cont Prep Typ %Rec	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116 Analyte Sulfite	R	esult Qualifier	Spike Added	2.0 LCS Result	LCS		Client	Sample	Analyzed 02/24/25 18:0 DID: Lab Cont Prep Typ %Rec Limits 70 - 130	Dil Fac
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: 400-270993-1 MS	R	esult Qualifier	Spike Added	2.0 LCS Result	LCS		Client	Sample	Analyzed 02/24/25 18:0 DID: Lab Cont Prep Typ %Rec Limits 70 - 130 Client Sat	Dil Fac Dil Fac trol Sample e: Total/NA
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: 400-270993-1 MS Matrix: Water	R	esult Qualifier	Spike Added	2.0 LCS Result	LCS		Client	Sample	Analyzed 02/24/25 18:0 DID: Lab Cont Prep Typ %Rec Limits 70 - 130 Client Sat	Dil Fac point of the second s
Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116		esult Qualifier	Spike Added	2.0 LCS Result 39.0	LCS		Client	Sample	Analyzed 02/24/25 18:0 DID: Lab Cont Prep Typ %Rec Limits 70 - 130 Client Sat	Dil Fac point of the second s
Matrix: Water Analysis Batch: 38116 Sulfite Lab Sample ID: LCS 705-38116/2 Matrix: Water Analysis Batch: 38116 Analyte Sulfite Lab Sample ID: 400-270993-1 MS Matrix: Water	Sample	<pre>esult Qualifier <2.0 </pre>	Spike Added 50.0	2.0 LCS Result 39.0	LCS Qualifier		Client	Sample	Analyzed 02/24/25 18:0 ID: Lab Cont Prep Typ %Rec Limits 70 - 130 Client Sau Prep Typ	Dil Fac point of the second s

Job ID: 400-270993-1

Method: 4500 SO3 B-2011 - Sulfite (Continued)

Lab Sample ID: 400-270993-1 M Matrix: Water Analysis Batch: 38116	ISD									Sample Type: Tot	
	•	Sample	Spike		MSD				%Rec		RPD
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit
Sulfite	<2.0	HF	50.0	38.0		mg/L		76	50 - 150	0	30

Method: SM 2120B - Color, Colorimetric

Lab Sample ID: MB 400-699497/1 Matrix: Water											Cli	ent S	ample ID: Me Prep Typ		
Analysis Batch: 699497															
		МВ	МВ												
Analyte	R	esult	Qualifier		RL		MDL	Unit		D	Prepa	red	Analyzed		Dil Fac
Color		<5.0			5.0			Color	Units				02/15/25 13:1	2	1
pH at time of analysis		6.12			0.010			SU					02/15/25 13:1	2	1
Lab Sample ID: LCS 400-699497/3										Clien	t Sa	mple	ID: Lab Cont	rol S	ample
Matrix: Water													Prep Typ	e: To	tal/NA
Analysis Batch: 699497															
				Spike		LCS	LCS						%Rec		
Analyte				Added		Result	Qual	ifier	Unit	D	%	Rec	Limits		
Color				35.0		34.0			Color Unit	s –		97	90 - 110		
Lab Sample ID: 400-270993-1 DU													Client Sar	nple	ID: 01
Matrix: Water													Prep Typ	e: To	tal/NA
Analysis Batch: 699497															
	Sample	Samp	ble			DU	DU								RPD
Analyte	Result	Quali	fier			Result	Qual	ifier	Unit	D				RPD	Limit
Color	<5.0					<5.0			Color Unit	s –				NC	6
pH at time of analysis	6.4					6.44			SU					0	30

Method: SM 4500 CI G - Chlorine, Residual

Lab Sample ID: MB 400-700927/4 Matrix: Water Analysis Batch: 700927							Client S	ample ID: Metho Prep Type: 1	
	МВ	МВ							
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chlorine, free	<0.10		0.10		mg/L			02/28/25 12:57	1
Chlorine, Total Residual	<0.10		0.10		mg/L			02/28/25 12:57	1
Lab Sample ID: LCS 400-700927/5 Matrix: Water Analysis Batch: 700927						CI	ient Sample	ID: Lab Control Prep Type: 1	
			Spike	LCS LCS				%Rec	

	Spik	e Los	LCS			%Rec	
Analyte	Adde	d Result	Qualifier	Unit D	%Rec	Limits	
Chlorine, free	1.1	7 1.09		mg/L	93	85 - 115	
Chlorine, Total Residual	1.1	7 1.16		mg/L	99	85 - 115	

3/14/2025

Method: SM 4500 CI G - Chlorine, Residual (Continued)

Lab Sample ID: LCSD 400-700927/6	5							Cli	ient Sa	mple ID:	Lab Control S	Samp	le Du
Matrix: Water											Prep Ty	be: To	tal/N
Analysis Batch: 700927													
			Spike		LCSD	LCS	D				%Rec		RF
Analyte			Added	I	Result	Qual	ifier	Unit	D	%Rec	Limits	RPD	Lir
Chlorine, free			1.17		1.10			mg/L		94	85 - 115	1	10
Chlorine, Total Residual			1.17		1.17			mg/L		100	85 - 115	1	10
Lab Sample ID: MRL 400-700927/3									Clier	nt Sampl	e ID: Lab Con	trol S	amp
Matrix: Water											Prep Ty	be: To	tal/N
Analysis Batch: 700927													
-			Spike		MRL	MRL					%Rec		
Analyte			Added	I	Result	Qual	ifier	Unit	D	%Rec	Limits		
Chlorine, free			0.117		0.110			mg/L		94	50 - 150		
Chlorine, Total Residual			0.117		0.110			mg/L		94	50 - 150		
Lab Sample ID: 400-270993-1 DU											Client Sa	mple	ID:
Natrix: Water											Prep Ty		
Analysis Batch: 700927													
	Sample S	ample			DU	DU							R
Analyte	Result Q	ualifier		1	Result	Qual	ifier	Unit	D			RPD	Li
Chlorine, free	<0.10 H	F			<0.10			mg/L				NC	
Chlorine, Total Residual	<0.10 H	F			<0.10			mg/L				NC	
ethod: SM 5540C - Methylen	e Blue A	ctive S	ubstances	(MBA	AS)								
_ab Sample ID: MB 400-699523/3										Client	Sample ID: Mo	ethod	Bla
Matrix: Water											Prep Ty		
Analysis Batch: 699523													
,,	N	ІВ МВ											
Analyte	Resu	ult Qualif	ier	RL		MDL	Unit		D	Prepared	Analyzed		Dil F
Aethylene Blue Active Substances	<0.7	10		0.10			mg/l L 340	AS MW			02/16/25 09	42	
_ab Sample ID: LCS 400-699523/4									Clier	t Samal	e ID: Lab Con	trol S	
Lab Sample ID: LCS 400-699523/4									Clief	n əampi	Prep Ty		
											Frep Iy	Je. 10	ial/I
Analysis Batch: 699523													

	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Methylene Blue Active	0.500	0.514		mg/I LAS		103	90 - 110	-
Substances				MW 340				
Lab Sample ID: MRL 400-699523/5					Client	Sample	ID: Lab Control Sample	
Matrix: Water							Prep Type: Total/NA	۱.
Analysis Batch: 699523								
	Spike	MRL	MRL				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Methylene Blue Active	0.100	0.0970	J	mg/L		97	75 - 125	-
Substances								

Method: SM 5540C - Methylene Blue Active Substances (MBAS) (Continued)

Lab Sample ID: 400-270993-1 MS Matrix: Water													Sample	
												Prepi	ype: To	tai/n
Analysis Batch: 699523														
	Sample	-		Spike		MS	MS					%Rec		
Analyte	Result	Qualif	ier	Added		Result	Qual	ifier	Unit	D	%Rec	Limits		
Methylene Blue Active	0.22	F1		0.500		0.377	F1		mg/I LAS		32	70 - 130		
Substances									MW 340					
Lab Sample ID: 400-270993-1 MSD												Client	Sample	ID:
Natrix: Water												Prep T	ype: To	tal/N
Analysis Batch: 699523												· · · ·		
	Sample	Sampl	le	Spike		MSD	MSD					%Rec		R
Analyte	Result	Qualif	ier	Added		Result	Qual	ifier	Unit	D	%Rec	Limits	RPD	Lir
Methylene Blue Active	0.22	F1		0.500		0.392	F1		mg/I LAS		35	70 - 130	4	
Substances									MW 340					
ethod: SM 9222D - Coliforms	s, Feca	l (Me	mbrane	e Filter)										
Lab Sample ID: MB 400-699507/1											Client S	Sample ID:	Method	Blai
Matrix: Water												Prep T	vpe: To	tal/N
Analysis Batch: 699507													,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
		мв м	мв											
Analyte	R		Qualifier		RL		MDL	Unit	D	F	Prepared	Analyz	ed	Dil F
Coliform, Fecal		<1.0			1.0			CFU/	100mL			02/14/25	17:51	
Lab Sample ID: 400-270993-1 DU													Sample	
Matrix: Water												Prep T	ype: To	tal/N

Fleb	Type.	Τυται

Analysis Batch: 699507									
	Sample	Sample	DU	DU					RPD
Analyte	Result	Qualifier	Result	Qualifier	Unit	D		RPD	Limit
Coliform, Fecal	56		 60.0		CFU/100mL	_	 	7	50

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Client Sample ID: 01 Date Collected: 02/14/25 10:00 Date Received: 02/14/25 15:30

Lab Sample ID: 400-270993-1 Matrix: Water

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	300.0		1	10 mL	10 mL	699944	02/18/25 21:59	AMM	EET PEN
Total Recoverable	Prep	200.7-1994 R4.4			25 mL	25 mL	876248	02/19/25 05:44	RR	EET SAV
Total Recoverable	Analysis	200.7 Rev 4.4		1			876463	02/19/25 17:25	BJB	EET SAV
Total/NA	Prep	245.1			50 mL	50 mL	876346	02/19/25 12:35	MG	EET SAV
Total/NA	Analysis	245.1-1994 R3.0		1			876437	02/19/25 17:25	BJB	EET SAV
Total/NA	Analysis	150.1		1			699776	02/18/25 01:42	JP	EET PEN
Total/NA	Analysis	160.2		1	200 mL	100 mL	700115	02/20/25 15:14	EJT	EET PEN
Total/NA	Prep	1664B			1016 mL	1000 mL	702291	03/14/25 11:41	DPB	EET PEN
Total/NA	Analysis	1664B		1			702337	03/14/25 14:56	DPB	EET PEN
Total/NA	Prep	Distill/CN			6 mL	6 mL	700199	02/21/25 09:53	VB	EET PEN
Total/NA	Analysis	335.2		1	100 mL	100 mL	700249	02/21/25 14:21	VB	EET PEN
Total/NA	Analysis	350.1		1	10 mL	10 mL	699906	02/19/25 13:19	CAC	EET PEN
Total/NA	Analysis	353.2		1	5 mL	5 mL	700255	02/21/25 12:55	KWS	EET PEN
Total/NA	Prep	365.2/365.3/365			25 mL	25 mL	699619	02/17/25 15:22	VB	EET PEN
Total/NA	Analysis	365.4		1	10 mL	10 mL	699849	02/18/25 16:45	VB	EET PEN
Total/NA	Analysis	375.4		5	10 mL	10 mL	702054	03/12/25 13:10	CJK	EET PEN
Total/NA	Analysis	376.2		1	7.5 mL	7.5 mL	699675	02/18/25 13:47	AC	EET PEN
Total/NA	Analysis	405.1		1	300 mL	300 mL	699444	02/14/25 18:16	TDM	EET PEN
							Completed:	02/19/25 11:53 ¹		
Total/NA	Analysis	410.4		1	2 mL	2 mL	701733	03/10/25 10:43	CJK	EET PEN
Total/NA	Analysis	415.1		1	50 mL	50 mL	700179	02/20/25 21:45	AC	EET PEN
Total/NA	Analysis	420.4		1	10 mL	10 mL	700241	02/21/25 13:26	CAC	EET PEN
Total/NA	Analysis	4500 SO3 B-2011		1	50 mL	50 mL	38116	02/24/25 18:00	AH	EET ATL
Total/NA	Analysis	Nitrogen,Org		1			700390	02/24/25 11:44	KWS	EET PEN
Total/NA	Analysis	SM 2120B		1			699497	02/15/25 13:12	KWS	EET PEN
Total/NA	Analysis	SM 4500 CI G		1	10 mL	10 mL	700927	02/28/25 12:57	CAC	EET PEN
Total/NA	Analysis	SM 5540C		1	100 mL	100 mL	699523	02/16/25 09:42	CJK	EET PEN
Total/NA	Analysis	SM 9222D		1	25 mL	100 mL	699507	02/14/25 17:51	TDM	EET PEN
	7 (naryoio				201112	100 mL	Completed:	02/15/25 15:53 1		

Client Sample ID: Method Blank Date Collected: N/A

Lab Sample ID: MB 400-699497/1

Matrix: Water

Date Received: N/A

_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 2120B		1			699497	02/15/25 13:12	KWS	EET PEN

Client Samp Date Collected Date Received:	: N/A	d Blank					La	b Sample ID		0-699507/ [,] Iatrix: Wate
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 9222D		1	100 mL	100 mL	699507 Completed:	02/14/25 17:51 02/15/25 15:53 ¹	TDM	EET PEN
Client Samp	le ID: Metho	d Blank					اد ا	b Sample ID	• MR 400	1_600523/
Date Collected							Eu			atrix: Wate
Date Received:										
_										
	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 5540C		1	100 mL	100 mL	699523	02/16/25 09:42	CJK	EET PEN
Client Samp Date Collected Date Received:	: N/A	d Blank					Lab S	Sample ID: N		99619/1-/ Aatrix: Wate
-	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	365.2/365.3/365			25 mL	25 mL	699619	02/17/25 15:22	VB	EET PEN
Total/NA	Analysis	365.4		1	10 mL	10 mL	699849	02/18/25 16:22	VB	EET PEN
Prop Type	Batch	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared	Analyst	Lab
Prep Type Total/NA	Type Analysis	<u>376.2</u>	Kun	1	7.5 mL	7.5 mL	699675	or Analyzed 02/18/25 13:47	Analyst AC	EET PEN
- Diant Camp	-	d Diank					Lab	O america ID:		<u> </u>
Date Collected		a Blank					Lap	Sample ID:		Aatrix: Wate
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Prep Type	Analysis			1	10 mL	10 mL	699906	02/19/25 13:18	CAC	EET PEN
Prep Type Total/NA	Analysis	350.1			TOTILE					
Total/NA Client Samp Date Collected	le ID: Metho : N/A						La	b Sample ID		
Total/NA Client Samp Date Collected	le ID: Metho : N/A : N/A	d Blank						b Sample ID		
Total/NA Client Samp Date Collected Date Received:	le ID: Metho : N/A : N/A Batch	d Blank Batch	Pue	Dil	Initial	Final	Batch	b Sample ID	N	latrix: Wate
Total/NA Client Samp Date Collected Date Received: Prep Type	Ie ID: Metho : N/A : N/A Batch Type	d Blank Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	b Sample ID Prepared or Analyzed	Analyst	latrix: Wate
Total/NA Client Samp Date Collected Date Received: Prep Type Total/NA	le ID: Metho : N/A : N/A Batch Type Analysis	d Blank Batch Method 300.0	Run	Dil	Initial	Final	Batch Number 699944	b Sample ID Prepared or Analyzed 02/18/25 19:51	Analyst AMM	Atrix: Wate
Total/NA Client Samp Date Collected Date Received: Prep Type Total/NA Client Samp	le ID: Metho : N/A : N/A Batch Type Analysis le ID: Metho	d Blank Batch Method 300.0	Run	Dil Factor	Initial Amount	Final Amount	Batch Number 699944	b Sample ID Prepared or Analyzed	Analyst AMM : MB 400	Matrix: Wate - Lab EET PEN 0-700115/
Total/NA Client Samp Date Collected Date Received: Prep Type Total/NA Client Samp Date Collected	le ID: Metho : N/A : N/A Batch Type Analysis le ID: Metho : N/A	d Blank Batch Method 300.0	Run	Dil Factor	Initial Amount	Final Amount	Batch Number 699944	b Sample ID Prepared or Analyzed 02/18/25 19:51	Analyst AMM : MB 400	Matrix: Wate - Lab EET PEN 0-700115/
Total/NA Client Samp Date Collected Date Received: Total/NA Client Samp Date Collected	le ID: Metho : N/A : N/A Batch Type Analysis le ID: Metho : N/A	d Blank Batch Method 300.0	Run	Dil Factor	Initial Amount	Final Amount	Batch Number 699944	b Sample ID Prepared or Analyzed 02/18/25 19:51	Analyst AMM : MB 400	Matrix: Wate - Lab EET PEN 0-700115/
Total/NA Client Samp Date Collected Date Received: Prep Type Total/NA Client Samp Date Collected	le ID: Metho : N/A : N/A Batch Type Analysis le ID: Metho : N/A	d Blank Batch Method 300.0	Run	Dil Factor	Initial Amount	Final Amount	Batch Number 699944	b Sample ID Prepared or Analyzed 02/18/25 19:51	Analyst AMM : MB 400	latrix: Wate - Lab EET PEN
Total/NA Client Samp Date Collected Date Received: Prep Type	le ID: Metho : N/A MA Batch Type Analysis le ID: Metho : N/A	d Blank Batch Method 300.0 d Blank	Run	Dil Factor 1	Initial Amount 10 mL	Final Amount 10 mL	Batch Number 699944	b Sample ID Prepared or Analyzed 02/18/25 19:51 b Sample ID	Analyst AMM : MB 400	Matrix: Wate - Lab EET PEN 0-700115/

Analysis

410.4

Total/NA

10

Date Collected: Date Received:	: N/A	d Blank					Lak	o Sample ID:		-700179/3 Matrix: Wate
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	415.1		1	50 mL	50 mL	700179	02/21/25 01:23	AC	EET PEN
Client Sampl Date Collected: Date Received:		d Blank					La	ab Sample ID		0-700179/ Matrix: Wate
-	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	415.1		1	50 mL	50 mL	700179	02/20/25 16:49	AC	EET PEN
Client Sampl Date Collected: Date Received:	: N/A	d Blank					Lab	Sample ID: N		700199/1- Aatrix: Wat
	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	Distill/CN			6 mL	6 mL	700199	02/21/25 09:52	VB	EET PEN
Total/NA	Analysis	335.2		1	100 mL	100 mL	700249	02/21/25 13:57	VB	EET PEN
-										
Ргер Туре	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Prep Type Total/NA			Run					-	Analyst CAC	_ Lab EET PEN
Total/NA Client Sampl Date Collected:	Type Analysis le ID: Metho : N/A	Method 420.4	Run	Factor	Amount	Amount	Number 700241	or Analyzed	CAC MB 400	EET PEN
Total/NA Client Sampl Date Collected:	Type Analysis le ID: Metho : N/A	Method 420.4	Run	Factor	Amount	Amount	Number 700241	or Analyzed 02/21/25 13:25 • Sample ID:	CAC MB 400	EET PEN
Total/NA Client Sampl Date Collected:	Type Analysis le ID: Metho : N/A N/A	Method 420.4 d Blank	Run Run	Factor 1	Amount 10 mL	Amount 10 mL	Number 700241	or Analyzed	CAC MB 400	EET PEN
Total/NA Client Sampl Date Collected: Date Received:	Type Analysis le ID: Metho : N/A N/A Batch	Method 420.4 d Blank Batch		Factor 1	Amount 10 mL Initial	Amount 10 mL Final	Number 700241	or Analyzed 02/21/25 13:25 D Sample ID: Prepared	CAC MB 400	EET PEN -700255/2 Matrix: Wat
Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected:	Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A	Method 420.4 d Blank Batch Method 353.2		Factor 1 Dil Factor	Amount 10 mL Initial Amount	Amount 10 mL Final Amount	Number 700241 Lak Batch Number 700255	or Analyzed 02/21/25 13:25 D Sample ID: Prepared or Analyzed	CAC MB 400 MB 400 MB 400 MB 400 MB 400	EET PEN -700255/2 Matrix: Wat - Lab EET PEN 0-700927
Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected:	Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A	Method 420.4 d Blank Batch Method 353.2		Factor 1 Dil Factor	Amount 10 mL Initial Amount	Amount 10 mL Final Amount	Number 700241 Lak Batch Number 700255	or Analyzed 02/21/25 13:25 D Sample ID: Prepared or Analyzed 02/21/25 12:09	CAC MB 400 MB 400 MB 400 MB 400 MB 400	EET PEN -700255/2 Matrix: Wat - Lab EET PEN 0-700927/
Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected:	Type Analysis Ie ID: Metho : N/A N/A Batch Type Analysis Ie ID: Metho : N/A N/A	Method 420.4 d Blank Batch Method 353.2 d Blank		Factor 1 Dil Factor 1	Amount 10 mL Initial Amount 5 mL	Amount 10 mL Final Amount 5 mL	Number 700241 Lak Batch Number 700255 La	or Analyzed 02/21/25 13:25 D Sample ID: Prepared or Analyzed 02/21/25 12:09 ab Sample ID	CAC MB 400 MB 400 MB 400 MB 400 MB 400	EET PEN -700255/2 Matrix: Wate - Lab EET PEN
Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected: Date Received:	Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A N/A Batch	Method 420.4 d Blank Batch Method 353.2 d Blank Batch	Run	Factor 1 Dil Factor 1 Dil	Amount 10 mL Initial Amount 5 mL Initial	Amount 10 mL Final Amount 5 mL Final	 Number 700241 Lak Batch Number 700255 Lak Batch 	or Analyzed 02/21/25 13:25 D Sample ID: Prepared or Analyzed 02/21/25 12:09 ab Sample ID Prepared Prepared 02/21/25 12:09 ab Sample ID	CAC MB 400 MB 400 M Analyst KWS : MB 400 M	EET PEN -700255/2 Matrix: Wat EET PEN 0-700927 Matrix: Wat
Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected: Date Received: Prep Type Prep Type Prep Type	Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A	Method 420.4 d Blank Batch Method 353.2 d Blank Batch Method SM 4500 CI G	Run	Factor 1 Dil Factor 1 Dil Factor	Amount 10 mL Initial Amount 5 mL Initial Amount	Amount 10 mL Final Amount 5 mL Final Amount	Aumber 700241 Lak Batch Number 700255 La Batch Number 700927	or Analyzed 02/21/25 13:25 D Sample ID: Prepared 02/21/25 12:09 ab Sample ID Prepared or Analyzed	CAC MB 400 MB 400 M MB 400 M MB 400 M Analyst CAC : MB 400	EET PEN -700255/2 Matrix: Wat - Lab EET PEN 0-700927/ Matrix: Wat - Lab EET PEN
Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected: Date Collected: Date Received: Date R	Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A N/A Batch Type Analysis	Method 420.4 d Blank Batch Method 353.2 d Blank Batch Method SM 4500 Cl G d Blank	Run	Factor 1 Dil Factor 1	Amount 10 mL Initial Amount 5 mL Initial Amount 10 mL	Amount 10 mL Final Amount 5 mL Final Amount 10 mL	Number 700241 Lak Batch Number 700255 La Batch Number 700927 La	or Analyzed 02/21/25 13:25 D Sample ID: Prepared or Analyzed 02/21/25 12:09 ab Sample ID Prepared 02/21/25 12:09 ab Sample ID Prepared 02/22/25 12:57 ab Sample ID	CAC MB 400 MB 400 M MB 400 M MB 400 M Analyst CAC : MB 400	EET PEN -700255/2 Matrix: Wat - Lab EET PEN 0-700927 Matrix: Wat - Lab EET PEN 0-701733
Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Client Sampl Date Collected: Date Collected: Date Received: Date R	Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A N/A Batch Type Analysis le ID: Metho : N/A	Method 420.4 d Blank Batch Method 353.2 d Blank Batch Method SM 4500 CI G	Run	Factor 1 Dil Factor 1 Dil Factor	Amount 10 mL Initial Amount 5 mL Initial Amount	Amount 10 mL Final Amount 5 mL Final Amount	Aumber 700241 Lak Batch Number 700255 La Batch Number 700927	or Analyzed 02/21/25 13:25 D Sample ID: Prepared or Analyzed 02/21/25 12:09 ab Sample ID Prepared or Analyzed 02/21/25 12:09 ab Sample ID Prepared or Analyzed 02/21/25 12:57	CAC MB 400 MB 400 M MB 400 M MB 400 M Analyst CAC : MB 400	- Lab EET PEN -700255/2 Matrix: Wat EET PEN 0-700927 Matrix: Wat EET PEN 0-701733

2 mL

2 mL

701733

03/10/25 10:43

CJK

1

EET PEN

Client Sample Date Collected: N Date Received: N	I/A	d Blank					Lak	o Sample ID:		-702054/12 Natrix: Wate
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	375.4		1	10 mL	10 mL	702054	03/12/25 11:49	CJK	EET PEN
Client Sample	ID: Metho	d Blank					Lab	Sample ID: N	/IB 400-7	/02291/1-/
Date Collected: N	I/A							-		Aatrix: Wate
Date Received: N	/ A									
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	1664B			1000 mL	1000 mL	702291	03/14/25 11:28	DPB	EET PEN
Total/NA	Analysis	1664B		1			702337	03/14/25 14:56	DPB	EET PEN
Client Sample	ID: Metho	d Blank					Lab	Sample ID: N	//B 680-8	376248/1-/
Date Collected: N										Atrix: Wate
Date Received: N	/ A									
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total Recoverable	Prep	200.7-1994 R4.4			25 mL	25 mL	876248	02/19/25 05:44	RR	EET SAV
Total Recoverable	Analysis	200.7 Rev 4.4		1			876463	02/20/25 09:05	BJB	EET SAV
Client Sample	ID: Metho	d Blank					Lab	Sample ID: N	//B 680-8	376346/1-/
Date Collected: N										Atrix: Wate
Date Received: N	/ A									
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	245.1			50 mL	50 mL	876346	02/19/25 12:35	MG	EET SAV
Total/NA	Analysis	245.1-1994 R3.0		1			876437	02/19/25 16:49	BJB	EET SAV
Client Sample	ID: Metho	d Blank					L	_ab Sample I	D: MB 7	05-38116/
Date Collected: N									Ν	Atrix: Wate
Date Received: N	/ A									
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	4500 SO3 B-2011		1	50 mL	50 mL	38116	02/24/25 18:00	AH	EET ATL
- Client Sample	ID: Metho	d Blank					l at	Sample ID:	USB 40	1-699444/
Date Collected: N							Lai	Sample ID.		Atrix: Wate
Date Received: N									n n	atria. vvdle
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Pron Type		Method	Bun				Batch Number	-	Analyst	lah
Ргер Туре	Туре		Run	Factor	Amount	Amount		or Analyzed	Analyst	Lab

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	405.1		1	300 mL	300 mL	699444	02/14/25 13:20	TDM	EET PEN
							Completed:	02/19/25 10:35 1		

Client Sampl	ie ID: Lab Co	Sint of Sample					Lab	Sample ID:	LC5 400	J-033444
Date Collected: Date Received:									Ν	latrix: Wat
-	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	405.1		1	1 mL	1 mL	699444	02/14/25 13:20	TDM	EET PEN
							Completed:	02/19/25 10:44 ¹		
lient Sampl	le ID: Lab Co	ontrol Sample					Lab	Sample ID:	LCS 40	0-699497
ate Collected: ate Received:									Ν	latrix: Wat
ale Receiveu.										
	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 2120B		1			699497	02/15/25 13:12	KWS	EET PEN
lient Sampl ate Collected: ate Received:	: N/A	ontrol Sample					Lab	Sample ID:)-699507 Iatrix: Wa
	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 9222D		1	1 mL	100 mL	699507 Completed:	02/14/25 17:51 02/15/25 15:53 ¹	TDM	EET PEN
ate Collected:	N/A N/A	ontrol Sample						Sample ID:		
ate Collected: ate Received:	N/A N/A Batch	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Lab Batch Number	Prepared	N	latrix: Wat
Pate Collected: Pate Received: Prep Type	N/A N/A	Batch	Run				Batch	-		
ate Collected: ate Received: Prep Type Total/NA	N/A Batch Type Analysis	Batch Method	Run	Factor	Amount	Amount	Batch Number 699523	Prepared or Analyzed	Analyst CJK	latrix: Wa
ate Collected: ate Received: Prep Type Total/NA Client Samplate Collected	Batch Type Analysis	Batch Method SM 5540C	Run	Factor	Amount	Amount	Batch Number 699523	Prepared or Analyzed 02/16/25 09:42	Analyst CJK CS 400-6	Matrix: Wa
ate Collected: ate Received: Prep Type Total/NA lient Sampl ate Collected:	Batch Type Analysis	Batch Method SM 5540C	Run	Factor	Amount	Amount	Batch Number 699523	Prepared or Analyzed 02/16/25 09:42	Analyst CJK CS 400-6	Matrix: Wa - Lab EET PEN 699619/2
ate Collected: ate Received: Prep Type Total/NA Client Samplate Collected: ate Received:	Batch Type Analysis	Batch Method SM 5540C	Run Run	Factor 1	Amount 100 mL	Amount 100 mL	Batch Number 699523 Lab S	Prepared or Analyzed 02/16/25 09:42 ample ID: LC	Analyst CJK CS 400-6	Matrix: Wa - Lab EET PEN 699619/2
ate Collected: ate Received: Prep Type Total/NA lient Sampl ate Collected: ate Received: Prep Type	N/A Batch Type Analysis Ie ID: Lab Co N/A N/A Batch	Batch Method SM 5540C Control Sample Batch		Factor 1	Amount 100 mL	Amount 100 mL	Batch Number 699523 Lab S Batch	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared	Analyst CJK CS 400-6	Lab EET PEN 99619/2 Matrix: Wa
ate Collected: ate Received: Prep Type Total/NA lient Sampl ate Collected: ate Received: Prep Type Total/NA	N/A Batch Type Analysis I I I I: Lab Co N/A N/A Batch Type	Batch Method SM 5540C Dontrol Sample Batch Method		Factor 1	Amount 100 mL Initial Amount	Amount 100 mL Final Amount	Batch Number 699523 Lab S Batch Number	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared or Analyzed	Analyst CJK CS 400-6 N Analyst	Aatrix: Wa - Lab EET PEN 399619/2 Matrix: Wa - Lab EET PEN
ate Collected: ate Received: Prep Type Total/NA Client Samplate Collected: ate Received: Prep Type Total/NA Total/NA Total/NA	N/A N/A Batch Type Analysis Ie ID: Lab Co N/A N/A Batch Type Prep Analysis Ie ID: Lab Co	Batch Method SM 5540C Dontrol Sample Batch Method 365.2/365.3/365		Factor 1 Dil Factor	Amount 100 mL Initial Amount 25 mL	Amount 100 mL Final Amount 25 mL	Batch Number 699523 Lab S Batch Number 699619 699849	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared or Analyzed 02/17/25 15:22	Analyst CJK CS 400-6 M Analyst VB VB VB LCS 400	Lab EET PEN 699619/2 Matrix: Wa Lab EET PEN
ate Collected: ate Received: Prep Type Total/NA Client Sample ate Collected: ate Received: Prep Type Total/NA Total/NA Client Sample ate Collected:	N/A N/A Batch Type Analysis Ie ID: Lab Co N/A N/A Batch Type Prep Analysis Ie ID: Lab Co N/A	Batch Method SM 5540C Dentrol Sample Batch Method 365.2/365.3/365 365.4		Factor 1 Dil Factor	Amount 100 mL Initial Amount 25 mL	Amount 100 mL Final Amount 25 mL	Batch Number 699523 Lab S Batch Number 699619 699849	Prepared 02/16/25 09:42 ample ID: LC Prepared 02/17/25 15:22 02/19/25 10:28	Analyst CJK CS 400-6 M Analyst VB VB VB LCS 400	Lab EET PEN 699619/2 Matrix: Wa EET PEN
Prep Type Total/NA Client Sampl Date Collected: Prep Type Total/NA Client Sampl Date Collected: Date Received: Client Sampl Date Collected: Da	N/A N/A Batch Type Analysis Ie ID: Lab Co N/A N/A Batch Type Prep Analysis Ie ID: Lab Co N/A	Batch Method SM 5540C Dentrol Sample Batch Method 365.2/365.3/365 365.4		Factor 1 Dil Factor	Amount 100 mL Initial Amount 25 mL	Amount 100 mL Final Amount 25 mL	Batch Number 699523 Lab S Batch Number 699619 699849	Prepared 02/16/25 09:42 ample ID: LC Prepared 02/17/25 15:22 02/19/25 10:28	Analyst CJK CS 400-6 M Analyst VB VB VB LCS 400	Lab EET PEN 699619/2: Matrix: Wat EET PEN O-699675
ate Collected: ate Received: Prep Type Total/NA Client Sample ate Collected: ate Received: Prep Type Total/NA Total/NA Client Sample ate Collected:	N/A N/A Batch Type Analysis Ie ID: Lab Co N/A N/A Batch Type Prep Analysis Ie ID: Lab Co N/A N/A	Batch Method SM 5540C Dontrol Sample Batch Method 365.2/365.3/365 365.4 Dontrol Sample		 	Amount 100 mL Initial Amount 25 mL 10 mL	Amount 100 mL Final Amount 25 mL 10 mL	Batch Number 699523 Lab S Batch Number 699619 699849 Lab	Prepared 02/16/25 09:42 ample ID: LC Prepared 02/17/25 15:22 02/17/25 15:22 02/19/25 10:28 Sample ID:	Analyst CJK CS 400-6 M Analyst VB VB VB LCS 400	Lab EET PEN 699619/2: Matrix: Wat EET PEN
ate Collected: ate Received: Prep Type Total/NA Client Sampl ate Collected: ate Received: Prep Type Total/NA Total/NA Client Sampl ate Collected: ate Received: Prep Type	N/A N/A Batch Type Analysis Batch Type N/A N/A Batch Type Prep Analysis Batch Type Prep Analysis Batch N/A N/A Batch	Batch Method SM 5540C Ontrol Sample Batch Method 365.2/365.3/365 365.4 Ontrol Sample Batch	Run	Factor 1 Dil Factor 1 1 Dil	Amount 100 mL Initial Amount 25 mL 10 mL Initial	Amount 100 mL Final Amount 25 mL 10 mL Final	Batch Number 699523 Lab S Batch Number 699619 699849 Lab Batch	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared or Analyzed 02/17/25 15:22 02/19/25 10:28 Sample ID: Prepared	Analyst CJK CS 400-6 M Analyst VB VB LCS 400 M	Aatrix: Wa - Lab EET PEN 399619/2 Aatrix: Wa - Lab EET PEN EET PEN 0-699675 Matrix: Wa
ate Collected: ate Received: Prep Type Total/NA Client Sample ate Collected: ate Received: Prep Type Total/NA Client Sample ate Collected: ate Received: Total/NA	N/A N/A Batch Type Analysis Be ID: Lab Co N/A N/A Batch Type Prep Analysis Be ID: Lab Co N/A N/A Batch Type Prep Analysis Be ID: Lab Co Analysis	Batch Method SM 5540C Dontrol Sample Batch Method 365.2/365.3/365 365.4 Dontrol Sample Batch Batch Method	Run	Factor 1 Dil Factor 1 Dil Factor	Amount 100 mL Initial Amount 25 mL 10 mL Initial Amount	Amount 100 mL Final Amount 25 mL 10 mL Final Amount	Batch Number 699523 Lab S Batch Number 699619 699849 Lab Batch Number 699675	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared 02/17/25 15:22 02/19/25 10:28 Sample ID: Prepared or Analyzed	Analyst CJK CS 400-6 N VB VB LCS 400 N Analyst AC	Lab EET PEN 699619/2 Aatrix: Wat EET PEN EET PEN D-699675 Matrix: Wat - Lab EET PEN D-699675 Matrix: Wat - Lab EET PEN D-699675 Matrix: Wat - Lab EET PEN
Prep Type Total/NA Client Sampl Date Collected: Date Received: Prep Type Total/NA Total/NA Client Sampl Date Collected: Date Received: Date Collected: Date Received: Date Collected: Date Collected:	N/A N/A Batch Type Analysis Batch Type Prep Analysis Batch Type Prep Analysis Batch Type Prep Analysis Batch Type Analysis Batch Type Challer D: Lab Co	Batch Method SM 5540C Dentrol Sample Batch Method 365.2/365.3/365 365.4 Dentrol Sample Batch Method 376.2	Run	Factor 1 Dil Factor 1 Dil Factor	Amount 100 mL Initial Amount 25 mL 10 mL Initial Amount	Amount 100 mL Final Amount 25 mL 10 mL Final Amount	Batch Number 699523 Lab S Batch Number 699619 699849 Lab Batch Number 699675	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared or Analyzed 02/17/25 15:22 02/17/25 15:22 02/19/25 10:28 Sample ID: Prepared or Analyzed 02/18/25 13:47	Analyst CJK CS 400-6 N VB VB LCS 400 N Analyst AC LCS 400	Lab EET PEN 699619/2 Matrix: Wat EET PEN EET PEN EET PEN D-699675 Matrix: Wat EET PEN EET PEN D-699675 Matrix: Wat EET PEN D-6996756 D-699776
Prep Type Total/NA Client Sampl Pate Collected Date Received: Prep Type Total/NA Total/NA Client Sampl Date Collected Date Received: Prep Type Total/NA Client Sampl Date Collected	N/A N/A Batch Type Analysis Batch Type Prep Analysis Batch Type Prep Analysis Batch Type Prep Analysis Batch Type Analysis Batch Analysis Batch Type Analysis Batch Ty	Batch Method SM 5540C Dentrol Sample Batch Method 365.2/365.3/365 365.4 Dentrol Sample Batch Method 376.2	Run	Factor 1 Factor 1 Factor 1	Amount 100 mL Initial Amount 25 mL 10 mL Initial Amount 7.5 mL	Amount 100 mL Final Amount 25 mL 10 mL Final Amount 7.5 mL	Batch Number 699523 Lab S Batch Number 699849 Lab Batch Number 699675 Lab	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared or Analyzed 02/17/25 15:22 02/19/25 10:28 Sample ID: Prepared or Analyzed 02/19/25 10:28 Sample ID: Prepared or Analyzed 02/18/25 13:47 Sample ID:	Analyst CJK CS 400-6 N VB VB LCS 400 N Analyst AC LCS 400	Lab EET PEN 99619/2 Aatrix: Wat EET PEN EET PEN EET PEN P EET PEN P EET PEN EET PEN P EET PEN D-699675 Aatrix: Wat EET PEN D-699776
Prep Type Total/NA Client Sampl Date Collected: Date Received: Date Received: Prep Type Total/NA Client Sampl Date Collected: Date Collected: Date Received: Date Received:	N/A N/A Batch Type Analysis Batch Type Prep Analysis Batch Type Prep Analysis Batch Type Prep Analysis Batch Type Analysis Batch Type Challer D: Lab Co	Batch Method SM 5540C Dentrol Sample Batch Method 365.2/365.3/365 365.4 Dentrol Sample Batch Method 376.2	Run	Factor 1 Dil Factor 1 Dil Factor	Amount 100 mL Initial Amount 25 mL 10 mL Initial Amount	Amount 100 mL Final Amount 25 mL 10 mL Final Amount	Batch Number 699523 Lab S Batch Number 699619 699849 Lab Batch Number 699675	Prepared or Analyzed 02/16/25 09:42 ample ID: LC Prepared or Analyzed 02/17/25 15:22 02/17/25 15:22 02/19/25 10:28 Sample ID: Prepared or Analyzed 02/18/25 13:47	Analyst CJK CS 400-6 N VB VB LCS 400 N Analyst AC LCS 400	Aatrix: Wat - Lab EET PEN 599619/2- Aatrix: Wat - Lab EET PEN 0-699675 Matrix: Wat - Lab EET PEN

Date Collected: Date Received:	N/A	ontrol Sample					Lau	Sample ID: I		Aatrix: Wate
_										
	Batch	Batch	_	Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	350.1		1	10 mL	10 mL	699906	02/19/25 13:18	CAC	EET PEN
Client Sampl	e ID: Lab C	ontrol Sample					Lal	o Sample ID:	LCS 40	0-699944/8
Date Collected:	N/A								Ν	Aatrix: Wate
Date Received:	N/A									
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	300.0		1	10 mL	10 mL	699944	02/18/25 20:12	AMM	EET PEN
_				1	TO THE	10 IIIL	033344	02/10/23 20.12	AIVIIVI	
Client Sampl	e ID: Lab C	ontrol Sample					La	b Sample ID:	LCS 40	0-700115/2
Date Collected:	N/A								N	Aatrix: Wate
Date Received:	N/A									
_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	<u>160.2</u>		1	100 mL	100 mL	700115	02/20/25 15:14	EJT	EET PEN
	/ 11/01/010	100.2		1		100 IIIL	700110	52,20,20 10.14		
Client Sampl	e ID: Lab Co	ontrol Sample					Lab	Sample ID: I	_CS 400	-700179/4
Date Collected:	N/A								Ν	Aatrix: Wate
Date Received:	N/A									
_	Detak	Betek		Dil	1	F in al	Detak	Durante		
D	Batch	Batch	D	Dil	Initial	Final	Batch	Prepared	A	1
	Type	<u>Method</u> 415.1	Run	Factor	Amount	Amount 50 mL		or Analyzed 02/21/25 01:39	Analyst AC	_ Lab EET PEN
Total/NA	Analysis	415.1		I	50 mL	50 IIIL	700179	02/21/25 01.59	AC	
Client Sampl	e ID: Lab C	ontrol Sample					Lal	o Sample ID:	LCS 40	0-700179/9
Date Collected:	N/A	-						-	Ν	Aatrix: Wate
Date Received:	N/A									
_	Patab	Potob		Dil	Initial	Final	Potob	Bronorod		
Bron Turc	Batch	Batch	Dun		Initial	Final	Batch	Prepared	Analyst	Lab
	Type	Method	Run	Factor	Amount	Amount	_ Number	or Analyzed	Analyst	_ Lab EET PEN
Total/NA	Analysis	415.1		1	50 mL	50 mL	700179	02/20/25 17:23	AC	EEI PEN
Client Sampl	e ID: Lab C	ontrol Sample					Lab S	Sample ID: L	CS 400-7	700199/2-4
Date Collected:	N/A								Ν	Aatrix: Wate
Date Received:	N/A									
								<u> </u>		
	Batch	Batch	_	Dil	Initial	Final	Batch	Prepared	.	
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	
Total/NA	Prep	Distill/CN			6 mL	6 mL	700199	02/21/25 09:52	VB	EET PEN
Total/NA	Analysis	335.2		1	100 mL	100 mL	700249	02/21/25 13:58	VB	EET PEN
Client Samol	e ID: Lab Co	ontrol Sample					Lab	Sample ID: I	_CS 400	-700241/2
Date Collected:										Atrix: Wate
Date Conected.									n n	Matrix. Walt

—										
	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	420.4		1	10 mL	10 mL	700241	02/21/25 13:25	CAC	EET PEN

Initial

Amount

5 mL

Initial

Amount

100 mL

Initial

Amount

2 mL

Initial

Amount

10 mL

Final

Amount

5 mL

Final

Amount

100 mL

Final

Amount

2 mL

Batch

Number

700255

Batch

Number

700927

Batch

Number

701733

Dil

1

Dil

1

Dil

Dil

1

Factor

Factor

Factor

Factor

Run

Run

Run

Run

Date Collected: N/A

Date Received: N/A

Prep Type

Prep Type

Prep Type

Prep Type

Total/NA

Total/NA

Total/NA

Total/NA

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Method

353.2

Batch

Batch

Method

410.4

Batch

375.4

Method

Method

SM 4500 CI G

Matrix: Water

Lab

EET PEN

Matrix: Water

Lab

EET PEN

Matrix: Water

Lab

EET PEN

Matrix: Water

Matrix: Water

Lab Sample ID: LCS 400-700255/28

Analyst

Analyst

Analyst

CJK

Lab Sample ID: LCS 680-876248/2-A

Lab Sample ID: LCS 680-876346/2-A

CAC

Lab Sample ID: LCS 400-701733/6

KWS

Lab Sample ID: LCS 400-700927/5

Prepared

or Analyzed

Prepared

or Analyzed

Prepared

or Analyzed

03/10/25 10:43

02/28/25 12:57

02/21/25 12:10

10

Lab Sample ID: LCS 400-702054/13 Matrix: Water Final Batch Prepared Amount Number or Analyzed Analyst Lab 702054 03/12/25 11:49 EET PEN 10 mL CJK Lab Sample ID: LCS 400-702291/2-A Matrix: Water

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	1664B			1000 mL	1000 mL	702291	03/14/25 11:28	DPB	EET PEN
Total/NA	Analysis	1664B		1			702337	03/14/25 14:56	DPB	EET PEN

Client Sample ID: Lab Control Sample

Date Collected: N/A

Date Received: N/A Batch Batch Dil Initial Final Batch Prepared Method or Analyzed Prep Type Туре Run Factor Amount Amount Number Analyst Lab **Total Recoverable** Prep 200.7-1994 R4.4 25 mL 25 mL 876248 02/19/25 05:44 RR EET SAV 876463 **Total Recoverable** Analysis 200.7 Rev 4.4 1 02/19/25 16:47 BJB EET SAV

Client Sample ID: Lab Control Sample

Date Collected: N/A

Date Received: N/A

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	245.1			50 mL	50 mL	876346	02/19/25 12:35	MG	EET SAV
Total/NA	Analysis	245.1-1994 R3.0		1			876437	02/19/25 16:52	BJB	EET SAV

Date Collected: N/A

Date Received: N/A

Client Sample ID: Lab Control Sample

Job ID: 400-270993-1

Matrix: Water

Lab Sample ID: LCS 705-38116/2

5
8
9
10
11

Batch Batch Dil Initial Final Batch Prepared Prep Type Method Factor Amount Amount Number or Analyzed Analyst Type Run Lab 4500 SO3 B-2011 Total/NA Analysis 50 mL 50 mL 38116 02/24/25 18:00 AH EET ATL 1 Lab Sample ID: LCSD 400-699944/9 **Client Sample ID: Lab Control Sample Dup** Date Collected: N/A Matrix: Water Date Received: N/A Batch Batch Dil Initial Final Batch Prepared Prep Type Method Amount Amount Number or Analyzed Туре Run Factor Analyst Lab 300.0 10 mL 699944 02/18/25 20:35 EET PEN Total/NA Analysis 10 mL AMM 1 **Client Sample ID: Lab Control Sample Dup** Lab Sample ID: LCSD 400-700179/10 Date Collected: N/A Matrix: Water Date Received: N/A Batch Batch Dil Initial Final Batch Prepared Prep Type Туре Method Run Factor Amount Amount Number or Analyzed Analyst Lab Total/NA 415.1 700179 02/20/25 17:39 AC EET PEN Analysis 50 mL 50 mL Lab Sample ID: LCSD 400-700179/41 Client Sample ID: Lab Control Sample Dup Date Collected: N/A Matrix: Water Date Received: N/A Dil Final Batch Batch Initial Batch Prepared Prep Type Туре Method Run Factor Amount Amount Number or Analyzed Analyst Lab 415.1 700179 02/21/25 01:54 EET PEN Total/NA Analysis 50 mL 50 mL AC 1 **Client Sample ID: Lab Control Sample Dup** Lab Sample ID: LCSD 400-700927/6 Date Collected: N/A Matrix: Water Date Received: N/A Batch Dil Initial Batch Final Batch Prepared Prep Type Туре Method Run Factor Amount Amount Number or Analyzed Analyst Lab Total/NA Analysis SM 4500 CI G 1 100 mL 100 mL 700927 02/28/25 12:57 CAC EET PEN **Client Sample ID: Lab Control Sample** Lab Sample ID: LLCS 680-876346/3-A Date Collected: N/A Matrix: Water Date Received: N/A Dil Batch Batch Initial Final Batch Prepared Method Prep Type Туре Run Factor Amount Amount Number or Analyzed Analyst Lab Total/NA 245.1 50 mL 876346 02/19/25 12:35 MG EET SAV Prep 50 mL Total/NA Analysis 245.1-1994 R3.0 876437 02/19/25 16:54 BJB EET SAV 1 **Client Sample ID: Lab Control Sample** Lab Sample ID: MRL 400-699523/5 Date Collected: N/A Matrix: Water Date Received: N/A

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 5540C		1	100 mL	100 mL	699523	02/16/25 09:42	CJK	EET PEN

Initial

Amount

7.5 mL

Initial

Amount

10 mL

Initial

Amount

100 mL

Final

Amount

7.5 mL

Final

Amount

10 mL

Final

Amount

100 mL

Batch

Number

699675

Batch

Number

699849

Batch

Number

699906

Lab Sample ID: MRL 400-700241/12

Lab Sample ID: MRL 400-700249/14

Lab Sample ID: MRL 400-700255/29

Dil

1

Dil

1

Dil

Factor

Factor

Factor

Run

Run

Run

Date Collected: N/A

Date Received: N/A

Date Collected: N/A

Date Received: N/A

Date Collected: N/A

Date Received: N/A

Prep Type

Prep Type

Prep Type

Total/NA

Total/NA

Total/NA

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Method

376.2

Batch

Method

365.4

Batch

Method

350.1

Matrix: Water

Matrix: Water

Matrix: Water

ام ا				
Lap	Sample ID:		0-699675/2 /atrix: Water	3
itch	Prepared			
ımber	or Analyzed	Analyst	Lab	5
9675	02/18/25 13:47	AC	EET PEN	6
Lab	Sample ID: N	IRL 400-	-699849/14	
			latrix: Water	
itch	Prepared			8
-				
ımber	or Analyzed	Analyst	Lab	
9849	02/18/25 15:11	VB	EET PEN	9
9849		VB	EET PEN	9 10
9849	02/18/25 15:11	VB	EET PEN	9 10
9849	02/18/25 15:11	VB	-699906/13	9 10 11
9849	02/18/25 15:11	VB	-699906/13	9 10 11
9849 Lab	02/18/25 15:11 Sample ID: N	VB	-699906/13	9 10 11 12
9849	02/18/25 15:11 Sample ID: N Prepared	/RL 400-	EET PEN -699906/13 Jatrix: Water	9 10 11 12 13

Lab Sample ID: MRL 400-70017 Matrix: Water

Date Collected: N/A Date Received: N/A

_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	415.1		1	50 mL	50 mL	700179	02/20/25 16:31	AC	EET PEN

Client Sample ID: Lab Control Sample Date Collected: N/A

Date Received: N/A

_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	420.4		1	100 mL	100 mL	700241	02/21/25 13:25	CAC	EET PEN

Client Sample ID: Lab Control Sample

Date Collected: N/A Date Received: N/A

_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	335.2		1	100 mL	100 mL	700249	02/21/25 13:55	VB	EET PEN

Client Sample ID: Lab Control Sample

Date Collected: N/A

Date Received: N/A

_	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	353.2		1	5 mL	5 mL	700255	02/21/25 12:12	KWS	EET PEN

Initial

Amount

100 mL

Initial

Amount

2 mL

Final

Amount

100 mL

Final

Amount

2 mL

Batch

Number

700927

Batch

Number

701733

Dil

1

Dil

1

Factor

Factor

Run

Run

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Туре

Analysis

Client Sample ID: Lab Control Sample

Batch

Batch

Method

410.4

Method

SM 4500 CI G

Matrix: Water

Lab

EET PEN

Matrix: Water

Matrix: Water

Matrix: Water

Matrix: Water

Lab

Lab Sample ID: MRL 400-700927/3

Analyst

Analyst

CJK

Lab Sample ID: 400-270993-1 MS

Lab Sample ID: 400-270993-1 MSD

Lab Sample ID: 400-270993-1 DU

CAC

Lab Sample ID: MRL 400-701733/7

Prepared

or Analyzed

Prepared

or Analyzed

03/10/25 10:43

02/28/25 12:57

10

EET PEN Lab Sample ID: MRL 400-702054/14 Matrix: Water

Date Collected: N/A Date Received: N/A

Date Collected: N/A

Date Received: N/A

Date Collected: N/A

Date Received: N/A

Prep Type

Prep Type

Total/NA

Total/NA

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	375.4		1	10 mL	10 mL	702054	03/12/25 11:50	CJK	EET PEN

Client Sample ID: 01

Date Collected: 02/14/25 10:00

Date Received: 02/14/25 15:30

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	415.1		1	50 mL	50 mL	700179	02/20/25 21:59	AC	EET PEN
Total/NA	Analysis	420.4		1	10 mL	10 mL	700241	02/21/25 13:26	CAC	EET PEN
Total/NA	Analysis	4500 SO3 B-2011		1	50 mL	50 mL	38116	02/24/25 18:00	AH	EET ATL
Total/NA	Analysis	SM 5540C		1	100 mL	100 mL	699523	02/16/25 09:42	CJK	EET PEN

Client Sample ID: 01

Date Collected: 02/14/25 10:00

Date Received: 02/14/25 15:30

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	415.1		1	50 mL	50 mL	700179	02/20/25 22:13	AC	EET PEN
Total/NA	Analysis	420.4		1	10 mL	10 mL	700241	02/21/25 13:26	CAC	EET PEN
Total/NA	Analysis	4500 SO3 B-2011		1	50 mL	50 mL	38116	02/24/25 18:00	AH	EET ATL
Total/NA	Analysis	SM 5540C		1	100 mL	100 mL	699523	02/16/25 09:42	CJK	EET PEN

Client Sample ID: 01

Date Collected: 02/14/25 10:00

Date Received: 02/14/25 15:30

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Analysis	SM 2120B		1			699497	02/15/25 13:12	KWS	EET PEN
Total/NA	Analysis	SM 4500 CI G		1	10 mL	10 mL	700927	02/28/25 12:57	CAC	EET PEN
Total/NA	Analysis	SM 9222D		1	10 mL	100 mL	699507	02/15/25 17:51	TDM	EET PEN
							Completed:	02/15/25 15:53 ¹		

Lab Chronicle

Client: Alabama State Docks

Project/Site: McDuffie Coal Terminal 2C ¹ This procedure uses a method stipulated length of time for the process. Both start and end times are displayed.

Laboratory References:

EET ATL = Eurofins Atlanta, 3080 Presidential Dr, Atlanta, GA 30340, TEL (770)457-8177 EET PEN = Eurofins Pensacola, 3355 McLemore Drive, Pensacola, FL 32514, TEL (850)474-1001 EET SAV = Eurofins Savannah, 5102 LaRoche Avenue, Savannah, GA 31404, TEL (912)354-7858

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Method	Method Description	Protocol	Laboratory
300.0	Anions, Ion Chromatography	EPA	EET PEN
200.7 Rev 4.4	Metals (ICP)	EPA	EET SAV
245.1-1994 R3.0	Mercury (CVAA)	EPA	EET SAV
150.1	pH (Electrometric)	EPA	EET PEN
160.2	Solids, Total Suspended (TSS)	EPA	EET PEN
1664B	HEM and SGT-HEM	1664B	EET PEN
335.2	Cyanide, Total	EPA	EET PEN
350.1	Nitrogen, Ammonia	EPA	EET PEN
353.2	Nitrogen, Nitrate-Nitrite	EPA	EET PEN
365.4	Phosphorus, Total	EPA	EET PEN
375.4	Sulfate	EPA	EET PEN
376.2	Sulfide	EPA	EET PEN
405.1	BOD, 5-Day	EPA	EET PEN
410.4	COD	EPA	EET PEN
415.1	TOC	EPA	EET PEN
420.4	Phenolics, Total Recoverable	EPA	EET PEN
4500 SO3 B-2011	Sulfite	SM	EET ATL
Nitrogen,Org	Nitrogen, Organic	EPA	EET PEN
SM 2120B	Color, Colorimetric	SM	EET PEN
SM 4500 CI G	Chlorine, Residual	SM	EET PEN
SM 5540C	Methylene Blue Active Substances (MBAS)	SM	EET PEN
SM 9222D	Coliforms, Fecal (Membrane Filter)	SM	EET PEN
1664B	HEM and SGT-HEM (Aqueous)	1664B	EET PEN
200.7-1994 R4.4	Preparation, Total Recoverable Metals	EPA	EET SAV
245.1	Preparation, Mercury	EPA	EET SAV
365.2/365.3/365	Phosphorus, Total	EPA	EET PEN
Distill/CN	Distillation, Cyanide	None	EET PEN

Protocol References:

1664B = EPA-821-98-002

EPA = US Environmental Protection Agency

None = None

SM = "Standard Methods For The Examination Of Water And Wastewater"

Laboratory References:

EET ATL = Eurofins Atlanta, 3080 Presidential Dr, Atlanta, GA 30340, TEL (770)457-8177

EET PEN = Eurofins Pensacola, 3355 McLemore Drive, Pensacola, FL 32514, TEL (850)474-1001

EET SAV = Eurofins Savannah, 5102 LaRoche Avenue, Savannah, GA 31404, TEL (912)354-7858

3/14/2025

Accreditation/Certification Summary

Laboratory: Eurofins Pensacola

oratory: Eurofins otherwise noted, all analy	Pensacola rtes for this laboratory were co	vered under each accredi	tation/certification below.		
rity	Program	m	Identification Number	Expiration Date	
ma	State		40150	06-30-25	
• •	are included in this report, but bes not offer certification.	the laboratory is not certif	ied by the governing authority. This	list may include analytes	
Analysis Method	Prep Method	Matrix	Analyte		
150.1	· _ ·	Water	pH		
150.1		Water	Temperature		
160.2		Water	Total Suspended Solids		
1664B	1664B	Water	Oil & Grease		
300.0		Water	Bromide		
300.0		Water	Fluoride		
335.2	Distill/CN	Water	Cyanide, Total		
350.1		Water	Ammonia		
353.2		Water	Nitrate Nitrite as N		
365.4	365.2/365.3/365	Water	Phosphorus, Total		
375.4		Water	Sulfate		
376.2		Water	Sulfide		
405.1		Water	Biochemical Oxygen De	emand	
410.4		Water	Chemical Oxygen Dema	and	
415.1		Water	Total Organic Carbon		
420.4		Water	Phenols, Total		
Nitrogen,Org		Water	Nitrogen, Organic		
SM 2120B		Water	Color		
SM 2120B		Water	pH at time of analysis		
SM 4500 CI G		Water	Chlorine, free		
SM 4500 CI G		Water	Chlorine, Total Residual		
SM 5540C		Water	Methylene Blue Active S	Substances	
SM 9222D		Water	Coliform, Fecal		

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
150.1		Water	pH
150.1		Water	Temperature
160.2		Water	Total Suspended Solids
1664B	1664B	Water	Oil & Grease
335.2	Distill/CN	Water	Cyanide, Total
350.1		Water	Ammonia
365.4	365.2/365.3/365	Water	Phosphorus, Total
375.4		Water	Sulfate
376.2		Water	Sulfide
405.1		Water	Biochemical Oxygen Demand
410.4		Water	Chemical Oxygen Demand
415.1		Water	Total Organic Carbon
420.4		Water	Phenols, Total
Nitrogen,Org		Water	Nitrogen, Organic
SM 2120B		Water	Color
SM 2120B		Water	pH at time of analysis
SM 4500 CI G		Water	Chlorine, free
SM 4500 CI G		Water	Chlorine, Total Residual

Laboratory: Eurofins Pensacola (Continued)

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

nority	Progr	am	Identification Number	Expiration Date
0,	are included in this report, bu oes not offer certification.	ut the laboratory is not certi	fied by the governing authority. This list	may include analytes
Analysis Method	Prep Method	Matrix	Analyte	
SM 5540C		Water	Methylene Blue Active Sub	stances
		Water	Coliform, Fecal	

Laboratory: Eurofins Atlanta

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date	9
AIHA LAP, LLC	Environmental Lead Laboratory	LAP-100671	11-01-25	
	Accreditation Program (ELLAP)			
AIHA LAP, LLC	Industrial Hygiene Laboratory	LAP-100671	11-01-25	
	Accreditation Program (IHLAP)			
Florida	NELAP	E87582	06-30-25	
Georgia	State	E87582	06-30-25	
Georgia (DW)	State	800	04-25-26	
Kentucky (UST)	State	123046	06-30-25	
North Carolina (WW/SW)	State	562	12-31-25	
South Carolina	State	98016	06-30-25	
USDA	US Federal Programs	525-23-143-96227A1	05-23-26	

Laboratory: Eurofins Savannah

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

nority	Program	n	Identification Number	Expiration Date
ama	State		41450	06-30-25
ι,	1 /	the laboratory is not certif	ied by the governing authority. This lis	t may include analyte
for which the agency do Analysis Method	bes not offer certification. Prep Method	Matrix	Analyte	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Aluminum	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Antimony	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Arsenic	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Barium	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Boron	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Cobalt	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Iron	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Lead	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Magnesium	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Manganese	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Molybdenum	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Selenium	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Silver	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Thallium	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Tin	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Titanium	
200.7 Rev 4.4	200.7-1994 R4.4	Water	Zinc	

3355 McLemore Drive Pensacola, FL 32514 Phone: 850-474-1001 Fax: 850-478-2671 Chain of Custody Record



eurofins | Environment Testing

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3/14/2025

3355 McLemore Drive

Chain of Custody Record

Pensacola, FL 32514 Phone: 850-474-1001 Fax: 850-478-2671

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3355 McLemore Drive Pensacola, FL 32514

Phone: 850-474-1001 Fax: 850-478-2671

Chain of Custody Record



🔅 eurofins

Environment Testing

Client Information (Sub Contract Lab) N/A Client Contact: Phone: Shipping/Receiving N/A Company: TestAmerica Laboratories, Inc. Address: Due Date Requ 13715 Rider Trail North, 2/25/2025 City: TAT Requester Earth City TAT Requester State, Zip: M/A MO, 63045 PO #: Phone: N/A S14-298-8566(Tel) 314-298-8757(Fax) Email: WO #: N/A Project Name: MCDuffie Coal Terminal 2C 40017987 Site: N/A N/A N/A Sample Identification - Client ID (Lab ID) Sample Da 01 (400-270993-1) 2/14/25			E-M	bel.e	nfing	er@et	eurofi	ineue				e of Orig	jin:				400-369555.1 Page:	
Company: TestAmerica Laboratories, Inc. Address. 13715 Rider Trail North, (ity: Earth City State, Zip: MO, 63045 Phone: 314-298-8566(Tel) 314-298-8566(Tel) 90 #: N/A Project Name: McDuffie Coal Terminal 2C Site: N/A N/A Site: N/A Sample Identification - Client ID (Lab ID) Sample Da			isa			er@et	eurofi	incuc	com									
Address. Due Date Req. 13715 Rider Trail North, 2/25/2025 City: TAT Requester Earth City TAT Requester MO, 63045 Pome: Phone: 314-298-8757(Fax) N/A N/A Email: WO #: N/A Project Name: MCDuffie Coal Terminal 2C SSOW#: N/A N/A					redital	tions Re				_	Ala	bama	_				Page 1 of 1 Job #:	
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			Matrix	- 2	WSU	2 Ion	GFPC	0 S								6	N/A	
	Sample	Sample Type (C=comp,	(W=water, S=solid, O=waste/oll, BT=Tissue,		Partorm MS/	900.0/Evaporation Alpha & Beta 903.0/PrecSep_21 Standard Tarr	Ra226Ra228_(Radium-228	904.0/PrecSep_0 Standard Target List								Total Number of containers		
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Note: Since laboratory accreditations are subject to change, Eurofins Environment Testing Southe laboratory does not currently maintain accreditation in the State of Origin listed above for analysis/ accreditation status should be brought to Eurofins Environment Testing Southeast, LLC attention i																		
Possible Hazard Identification					Sam	ple Di	posa	I (A	fee ma	v be	asse	ssed i	fsam	ples a			ed longer than 1	
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Custody Seals Intact: Custody Seal No.:																		

13

Phone: 850-474-1001 Fax: 850-478-2671

3355 McLemore Drive Pensacola, FL 32514 Chain of Custody Record



Client Information (Sub Contract Lab)	Sampler: N/A				PM: finger,	Isabel	D				Carrie N/A	er Tracking	No(s):			COC No: 400-3695	557.1			
Client Information (Sub Contract Lab)	Phone:	Phone: E-M						The second secon								Page:				
Shipping/Receiving Company:	N/A			isa				d (See n			Alac	ama		-	_	Page 1 o Job #:	וזו			
Eurofins Environment Testing Southeast L								NAB; S		- Alaba	ama					400-2709	993-1			
Address:	Due Date Request	ed:								0.1						Preservat		les:		
5102 LaRoche Avenue, ,	2/24/2025					_		Ar	nalys	sis Re	ques	ted			_	•				
Dity: Savannah	TAT Requested (d	ays): N/A	`												A LOUGH					
State, Zip:			•																	
GA, 31404															3. 10					
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012-354-7858(Tel) 912-352-0165(Fax)	N/A W0 #:				2	letal														
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Project Name:	Project #:				Sample (Yes or	WO d	~								alne					
AcDuffie Coal Terminal 2C	40017987				-12	TR	Mercury								onte	O				
Site: N/A	SSOW#: N/A				am		Me								ofo	Other: N/A				
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			Sample	(W=water, S=solid,	Field Filtered Sample (Yes or Doctorne Michter (Yes or No)	200.7_CWA/200.7_P_TR (MOD) Metals	245.1/245.1_Prep								Total Number of containers					
		Sample	Type (C=comp,	O=waste/oil,	HP	0-2	1/24								NIE					
Sample Identification - Client ID (Lab ID)	Sample Date	Time	G=grab)	BT=Tissue, A=Air)	Fiel	200.	245.								Tot	Sp	ecial In:	structions	/Note:	
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ccreditation status should be brought to Eurofins Environment Testing S	outheast, LLC attention imm	ediately. If all	requested acci	editations are	current	to date,	return th	e signed	Chain	of Custo	dy attes	ting to said	d complia	ance to	Eurofins	Environme	ent Testing	g Southeast, I	LLC.	
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3355 McLemore Drive Pensacola, FL 32514 Phone 850-474-1001 Fax 850-478-2671

Chain of Custody Record



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Environment Testing

Client Information (Sub Contract Lab)	Sampler N/A	M naer. l	er, Isabel D						Carrier N/A	Trackin	g No(s)		COC 400	№ -369550 1				
Client Contact Shipping/Receiving	Phone [.] N/A	······	E-Mail	ŀ							State of	f Origin.			Page			
Company.				Accrec	litation	s Requi	red (S	SUS CC)		Alaba	ima			Job /	e 1 of 1 #		
Eurofins Environment Testing Southeast L	Due Date Requested			ISO/I	EC 17	7025 -	ANA	AB, Sta	te - A	Alabar	na			_		-270993-1 ervation C		
3080 Presidential Dr, ,	2/24/2025							Ana	lysis	s Red	uest	ed			Pres	servation C	odes.	
City ⁻ Atlanta	TAT Requested (days).	N/A									ΙT							
State Zip:																		
GA, 30340 Phone:	PO #				Ŋ													
770-457-8177(Tel)	N/A	N/A 22 WO #:																
Email. N/A	N/A	N/A													ŝ			
Project Name [.] McDuffie Coal Terminal 2C	Project #: 40017987			Field Filtered Sample (Yes Perform MS/MSD (Yes or N	6										Outaine Othe			
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Note Since laboratory accreditations are subject to change, Eurofins Environme	t Tasting Southaast LLC plag	the ownership of metho												mplo ching	Lant is form	ardod under d	hain of custodu	/ If the
laboratory does not currently maintain accreditations in the State of Origin listed a accreditation status should be brought to Eurofins Environment Testing Southea	bove for analysis/tests/matrix be	ing analyzed, the sample	s must be	e shipp	ed bac	k to the	Eurof	ins Envi	ironme	nt Test	ing Sou	theast, L	LC labo	ratory or ot	her instruc	tions will be p	rovided Any ch	nanges to
Possible Hazard Identification								-			-	-					1 month)	
Unconfirmed						Return				Ű,	Dispos	al By I	Lab		Archive	-	Month	s
Deliverable Requested I, II, III, IV, Other (specify)	Primary Deliverable Rai	nk 2		Sp	pecial	Instru	iction	ns/QC										
Empty Kit Relinguished by	Date]	Time	}				1	ſ	ŀ	Aethod c	of Shipm	ent:	. ((2
Relinquished by	Date/Time: 2117125	1700 Compa	any TTT		Rece	eived by	ſ.		KGP	~			Date/	Fime ⁻	18/25	9.3	3 Company	£
Relinquished by Relinquished by Relinquished by	Date/Time	Compa			Rece	eived by	r	<u> </u>	11-401				Date/	Time.			Company	artan (
Kelinquished by	Date/Time [.]	Compa	any		Rece	eived by	r						Date/	Time			Company	
	L														<u>_</u>	~		
Custody Seals Intact Custody Seal No Δ Yes Δ No					Cool			re(s) °C	and C	ther R	emarks.				/-(8 ≠26	568	
- ·							13					6		x		5 5		

Client: Alabama State Docks

Login Number: 270993 List Number: 1

Creator: Pardonner, Brett

Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>N/A</td> <td></td>	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	4.3°C IR10
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	False	

14

Client: Alabama State Docks

Login Number: 270993 List Number: 2

Creator: Maguire, Parris

Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>N/A</td> <td></td>	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	N/A	Received project as a subcontract.
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

List Source: Eurofins Atlanta

List Creation: 02/18/25 10:55 AM

Client: Alabama State Docks

Login Number: 270993 List Number: 3

Creator: Lincoln, Alyssa

Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>N/A</td> <td></td>	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Job Number: 400-270993-1

List Source: Eurofins Savannah

List Creation: 02/18/25 01:54 PM



Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Doug Otto Alabama State Docks PO BOX 1588 Mobile, Alabama 36633 Generated 3/17/2025 2:48:42 PM

JOB DESCRIPTION

McDuffie Coal Terminal 2C

JOB NUMBER

400-270993-2

Eurofins Pensacola 3355 McLemore Drive Pensacola FL 32514







Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

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Authorization

Authorized for release by Taylor Bruzzio, Project Manager I <u>Taylor.Bruzzio@et.eurofinsus.com</u> Designee for Isabel Enfinger, Project Manager I <u>isabel.enfinger@et.eurofinsus.com</u> (850)471-6237 Generated

3/17/2025 2:48:42 PM

5

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Job ID: 400-270993-2

Eurofins Pensacola

Job Narrative 400-270993-2

Receipt

The sample was received on 2/14/2025 3:30 PM. Unless otherwise noted below, the sample arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 4.3° C.

RAD

Method 900.0: The detection goal was not met for the following sample due to a reduction of the sample size attributed to high residual mass: 01 (400-270993-1). Analytical results are reported with the detection limit achieved.

Method Evaporation: The following samples had a final mass above the 100 mg limit: 01 (400-270993-1). The according dilution is noted in the notes section of the prep worksheet and is reflected in the initial amount field.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.
Client Sample ID: 01

No Detections.

Sample Summary

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
400-270993-1	01	Water	02/14/25 10:00	02/14/25 15:30

Client Sample ID: 01 Date Collected: 02/14/25 10:00

Date Received: 02/14/25 15:30

			Count	Total						
			Uncert.	Uncert.						
Analyte	Result	Qualifier	(2σ+/-)	(2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac
Gross Alpha	-0.604	UG	1.79	1.80	3.00	3.89	pCi/L	02/19/25 08:03	03/06/25 20:05	1
Gross Beta	2.56		1.16	1.19	4.00	1.64	pCi/L	02/19/25 08:03	03/06/25 20:05	1
	0 - Radium-226	(GFPC)								
	0 - Radium-226	6 (GFPC)	Count	Total						
Method: EPA 903.(0 - Radium-226	6 (GFPC)	Count Uncert.	Total Uncert.						
Method: EPA 903.0		GFPC) Qualifier			RL	MDC	Unit	Prepared	Analyzed	Dil Fac
		Qualifier	Uncert.	Uncert.	RL 1.00	MDC 0.265		Prepared 02/20/25 07:22	Analyzed 03/14/25 09:30	Dil Fac
Method: EPA 903.(Result	Qualifier	Uncert. (2σ+/-)	Uncert. (2σ+/-)						Dil Fac

			Uncert.	Uncert.							
Analyte	Result	Qualifier	(2σ+/-)	(2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac	
Combined Radium	0.931		0.491	0.496	5.00	0.657	pCi/L		03/17/25 14:19	1	
226 + 228											

Matrix: Water

5 6

Lab Sample ID: 400-270993-1

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

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Qualifiers

Rac	I

Qualifiers		
Rad		
Qualifier	Qualifier Description	
G	The Sample MDC is greater than the requested RL.	
U	Result is less than the sample detection limit.	5

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
 ¢	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Rad

Prep Batch: 703799

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
400-270993-1	01	Total/NA	Water	Evaporation	
MB 160-703799/1-A	Method Blank	Total/NA	Water	Evaporation	
CS 160-703799/2-A	Lab Control Sample	Total/NA	Water	Evaporation	
_CSB 160-703799/3-A	Lab Control Sample	Total/NA	Water	Evaporation	
rep Batch: 703881					
	Client Sample ID	Pren Tyne	Matrix	Method	Prep Batcl
ab Sample ID	Client Sample ID	Prep Type Total/NA	Matrix Water	Method PrecSep-21	Prep Batcl
ep Batch: 703881 ab Sample ID 00-270993-1 /IB 160-703881/1-A					Prep Batc

Job ID: 400-270993-2

Method: 900.0 - Gross Alpha and Gross Beta Radioactivity

Lab Sample ID: MB 16	0-703799/1	- A							Client Sa	mple ID: Metho	
Matrix: Water										Prep Type: 1	
Analysis Batch: 7063	33 MB	мв	Count Uncert.	Total Uncert.						Prep Batch:	70379
Analyte		Qualifier	(2σ+/-)	(2σ+/-)	RL	MDC	Unit		Prepared	Analyzed	Dil Fa
Gross Alpha	0.02966		0.495	0.495	3.00	0.953			19/25 08:03	03/06/25 19:51	
Gross Beta	-0.02563		0.438	0.438	4.00		pCi/L		19/25 08:03	03/06/25 19:51	
Lab Sample ID: LCS 1	60-703799/	2-A						Clien	t Sample I	D: Lab Control	Sampl
Matrix: Water		·								Prep Type: 1	
Analysis Batch: 7063	33									Prep Batch:	
•					Total						
		Spike	LCS	LCS	Uncert.					%Rec	
Analyte		Added	Result	Qual	(2σ+/-)	RL	MDC	Unit	%Rec	Limits	
Gross Alpha		49.5	55.09		7.90	3.00	1.80	pCi/L	111	75 - 125	
Lab Sample ID: LCSB	160-70379	9/3-A						Clien	t Sample I	D: Lab Control	Sampl
Matrix: Water										Prep Type: 1	Total/N
Analysis Batch: 7063	33									Prep Batch:	70379
					Total						
		Spike	LCSB	LCSB	Uncert.					%Rec	
Analyte		Added	Result	Qual	(2σ+/-)	RL	MDC	Unit	%Rec	Limits	
Gross Beta		70.1	69.81		7.51	4.00	0.848	pCi/L	100	75 - 125	
lethod: 903.0 - Rad	dium-226	(GFPC)									
Lab Sample ID: MB 16	0-703881/1	- A							Client Sa	mple ID: Metho	d Blan
Matrix: Water										Prep Type: 1	
Analysis Batch: 7078 [,]	13									Prep Batch:	

	INIB	INIB	Uncert.	Uncert.						
Analyte	Result	Qualifier	(2σ+/-)	(2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-226	0.1250	U	0.143	0.143	1.00	0.230	pCi/L	02/20/25 07:22	03/14/25 09:31	1
	МВ	МВ								
Carrier	%Yield	Qualifier	Limits					Prepared	Analyzed	Dil Fac
Ba Carrier	89.1		30 - 110					02/20/25 07:22	03/14/25 09:31	1
— —										

Lab Sample ID: LCS 160-703881/2-A Matrix: Water Analysis Batch: 707813

Client Sample ID: Lab Control Sample Prep Type: Total/NA Prep Batch: 703881

				Total						
	Spike	LCS	LCS	Uncert.					%Rec	
Analyte	Added	Result	Qual	(2σ+/-)	RL	MDC	Unit	%Rec	Limits	
Radium-226	9.58	7.692		1.02	1.00	0.251	pCi/L	80	75 - 125	

	LCS	LCS	
Carrier	%Yield	Qualifier	Limits
Ba Carrier	84.8		30 - 110

Initial

Amount

Final

Amoun

Client Sample ID: 01 Date Collected: 02/14/25 10:00

		Lab Sample ID: 400-270993-1							
			N	latrix: Water					
	Batch	Prepared							
ıt	Number	or Analyzed	Analyst	Lab					
	703799	02/19/25 08:03	MEH	EET SL					

Date Received: 02/14/25 15:30 Batch Batch Prep Type Туре Method Total/NA Prep Evaporation

Total/NA	Prep	Evaporation		100.01 mL	1.0 g	703799	02/19/25 08:03	MEH	EET SL
Total/NA	Analysis	900.0	1	1.0 mL	1.0 mL	706428	03/06/25 20:05	SWS	EET SL
Total/NA	Prep	PrecSep-21		1000.09 mL	1.0 g	703881	02/20/25 07:22	OGC	EET SL
Total/NA	Analysis	903.0	1			707813	03/14/25 09:30	SWS	EET SL
Total/NA	Analysis	Ra226_Ra228	1			708159	03/17/25 14:19	SCB	EET SL
Client Sample I	D: Method	Blank				Lab	Sample ID: N	/IB 160-7	03799/1-A
Date Collected: N/A	4							M	latrix: Water

Dil

Factor

Run

Γ	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	Evaporation			200 mL	1.0 g	703799	02/19/25 08:03	MEH	EET SL
Total/NA	Analysis	900.0		1	1.0 mL	1.0 mL	706383	03/06/25 19:51	SWS	EET SL

Client Sample ID: Method Blank Date Collected: N/A Date Received: N/A

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Ргер Туре	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	PrecSep-21			1000 mL	1.0 g	703881	02/20/25 07:22	OGC	EET SL
Total/NA	Analysis	903.0		1			707813	03/14/25 09:31	SWS	EET SL

Client Sample ID: Lab Control Sample

Date Collected: N/A

Date Received: N	I/A
------------------	-----

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	Evaporation			200 mL	1.0 g	703799	02/19/25 08:03	MEH	EET SL
Total/NA	Analysis	900.0		1	1.0 mL	1.0 mL	706383	03/06/25 19:51	SWS	EET SL

Client Sample ID: Lab Control Sample Date Collected: N/A

Date Received: N/A

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	PrecSep-21			1000 mL	1.0 g	703881	02/20/25 07:22	OGC	EET SL
Total/NA	Analysis	903.0		1			707813	03/14/25 09:31	SWS	EET SL

Client Sample ID: Lab Control Sample Date Collected: N/A

Date Received: N/A

	Batch	Batch		Dil	Initial	Final	Batch	Prepared		
Prep Type	Туре	Method	Run	Factor	Amount	Amount	Number	or Analyzed	Analyst	Lab
Total/NA	Prep	Evaporation			200 mL	1.0 g	703799	02/19/25 08:03	MEH	EET SL
Total/NA	Analysis	900.0		1	1.0 mL	1.0 mL	706383	03/06/25 19:52	SWS	EET SL

Lab Sample ID: MB 160-703881/1-A

Lab Sample ID: LCS 160-703799/2-A

```
Matrix: Water
```

Lab Sample ID: LCS 160-703881/2-A

Lab Sample ID: LCSB 160-703799/3-A

Matrix: Water

Matrix: Water

Matrix: Water

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Laboratory References:

EET SL = Eurofins St. Louis, 13715 Rider Trail North, Earth City, MO 63045, TEL (314)298-8566

Eurofins Pensacola

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C

Method	Method Description	Protocol	Laboratory
900.0	Gross Alpha and Gross Beta Radioactivity	EPA	EET SL
903.0	Radium-226 (GFPC)	EPA	EET SL
Ra226_Ra228	Combined Radium-226 and Radium-228	TAL-STL	EET SL
Evaporation	Preparation, Evaporation	None	EET SL
PrecSep-21	Preparation, Precipitate Separation (21-Day In-Growth)	None	EET SL

EPA = US Environmental Protection Agency

None = None

TAL-STL = TestAmerica Laboratories, St. Louis, Facility Standard Operating Procedure.

Laboratory References:

EET SL = Eurofins St. Louis, 13715 Rider Trail North, Earth City, MO 63045, TEL (314)298-8566

Eurofins Pensacola

Accreditation/Certification Summary

Client: Alabama State Docks Project/Site: McDuffie Coal Terminal 2C Job ID: 400-270993-2

Laboratory: Eurofins St. Louis

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Naska (UST)	State	20-001	05-06-25
NAB	Dept. of Defense ELAP	L2305	04-06-25
NAB	Dept. of Energy	L2305.01	04-06-25
NAB	ISO/IEC 17025	L2305	04-08-25
Arizona	State	AZ0813	12-08-25
California	Los Angeles County Sanitation Districts	10259	06-30-22 *
California	State	2886	06-30-25
Connecticut	State	PH-0241	03-31-25
Florida	NELAP	E87689	06-30-25
II - RadChem Recognition	State	n/a	06-30-25
linois	NELAP	200023	11-30-25
owa	State	373	12-01-26
ansas	NELAP	E-10236	10-31-25
Centucky (DW)	State	KY90125	12-31-25
čentucky (WW)	State	KY90125 (Permit KY0004049)	12-31-25
ouisiana (All)	NELAP	106151	06-30-25
ouisiana (DW)	State	LA011	12-31-25
laryland	State	310	09-30-25
lassachusetts	State	M-MO054	06-30-25
II - RadChem Recognition	State	9005	06-30-25
lissouri	State	780	06-30-25
levada	State	MO00054	07-31-25
lew Jersey	NELAP	MO002	06-30-25
lew Mexico	State	MO00054	06-30-25
lew York	NELAP	11616	03-31-25
lorth Carolina (DW)	State	29700	07-31-25
lorth Dakota	State	R-207	06-30-25
Oklahoma	NELAP	9997	08-31-25
Dregon	NELAP	4157	09-01-25
Pennsylvania	NELAP	68-00540	02-28-26
South Carolina	State	85002	06-30-25
exas	NELAP	T104704193	07-31-25
JS Fish & Wildlife	US Federal Programs	058448	07-31-25
JSDA	US Federal Programs	525-23-138-94730	05-18-26
Jtah	NELAP	MO00054	07-31-25
/irginia	NELAP	460230	06-14-25
Vashington	State	C592	08-30-25
Vest Virginia DEP	State	381	10-31-25

* Accreditation/Certification renewal pending - accreditation/certification considered valid.

Eurofins Pensacola

3355 McLemore Drive Pensacola, FL 32514 Phone: 850-474-1001 Fax: 850-478-2671 Chain of Custody Record



eurofins | Environment Testing

Phone: 650-474-1001 Pax: 650-476-2671	Sampler:			La	b PM:						_	Carrier Tracking No(s):							COC No:		-
Client Information						er, Isa	bel [2_4	00-270	0993	coc								400-138044-45554.	1	
Client Contact:	Phone:				Mail:	onfina	~@	ot au	rofinsus	e		ł	State	of Origin	1:				Page: Page 1 of 2		
Ray Siddiqui Company:	L		PWSID:	15	abeile	sining		et.eu	onnsu	5.0011			_						Job #:		
Alabama State Docks									A	naly	sis	Req	ues	ted							
Address: PO BOX 1588	Due Date Request	ed:							ė										Preservation Codes: D - HNO3		
City: Mobile	TAT Requested (da	ays):							Combined Radium-226 and Radium										N - None S - H2SO4		
State, Zip: AL, 36633	Compliance Project	ct:∆Yes∠	No						26 and												
Phone: 251-441-7502	PO #: Purchase Order	Requested			į.				lium-2	B				epi							
Email: Rehman.Siddiqui@alports.com	WO #:				an that				ed Rac	rogen,	-Nitrit			& Fluo	2			Ĩ.			
Project Name: ASD - McDuffie Coal Terminal 2C	Project #: 40017987	Project #: 40017987			10.36	-			ombin	A, Nite	Nitrate			mide				CHER .			
Site:	SSOW#:				and the		26	58	1 1 1	4, 410.	ogen, h	938.0		8D - Bromide & F				1000	Other:		
EUROFINS MOBILE 700		Sample	Sample Type (C=comp,	Matrix (W=water, S=solid, 0=wasts/oil	Alle R		903.0 - Radium-226	904.0 - Radium-228	900.0 - Alpha & Beta Ra226Ra228_GFPC - 228	220 350.1, 351.2, 365.4, 410.4, Nitrogen,Org	353.2_Pres - Nitrogen, Nitrate-Nitrite	1664B - Oil & Grease	2120B, 375.4	300_ORGFM_28D - Bromide & Fluoride		415.1 - TOC	405.1 - BOD	Contradiction of			
Sample Identification	Sample Date	Time	G=grab)	BT=Tissue, A=	Air)		6	06	900 Ra	35	35	-9 -	3	я i		1 4	4	12	Special Instru	uctions/Note	:
				194 (29 <u>0</u> 9				3	<u> </u>		S.		<u>.</u>				-			and a second sec	
0	2-14-25	1000Ar	G	Water														-	<u> </u>		
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						\vdash			_	-								and the second s	<u> </u>		
Possible Hazard Identification						Sam					may	be as	ses	sed if	sam	oles a	are re	tain	ned longer than 1 mo	onth)	
Non-Hazard Flammable Skin Irritant Po	ison B 🛄 Unkr	nown	Radiologica	1					To Clie		Ļ			al By	Lab			Arcł	hive For	Months	
Deliverable Requested: I, II, III, IV, Other (specify)						Spe	cial I	nstru	ctions/0		equir	emen	s:								
Empty Kit Relinquished by:		Date:				me:								Method	of Sh	pment					
Relinguished by: Ray S. idd. gui	Date/Time: 2-14~25/	11:084		Company		4	Recei	ved by:	A	Ż	7		2	Z	7 Di	ite/Tim	-14	-2	5 1300 00	ompany	
Relinquished by:	Date/Time: 2-19-		30	Company	<u> </u>	F	Recei	ved by	~				4			ite/Tim				ompany	·
Relinquished by:	Date/Time:			Company			Recei	ved by	:	6	/	_			D	ite/Tim	^{e:} 2	114	125 1330 Co	ompany	
Custody Seals Intact: Custody Seal No.: Δ Yes Δ No	<u></u>			L			Coole	r Temp	erature(s) °C a	nd Oth	er Ren	narks:	4					10		
								<u> </u>								-			Vr	er: 10/10/2024	

13

3/17/2025

Eurofins Pensacola

3355 McLemore Drive Pensacola, FL 32514

Chain of Custody Record

Phone: 850-474-1001 Fax: 850-478-2671

Client Information	Sampler:				ab PM: nfinge	er Isa	sabel D					Carrier Tracking No(s):				COC No: 400-138044-45	554.2	
Client Contact:	Phone:			E	-Mail:								State of	Origin:			Page:	
Ray Siddiqui Company:			PWSID:	i	sabel.e	enfing	er@e	et.euro	ofinsu	IS.CO	m						Page 2 of 2 Job #:	
Alabama State Docks			FWGID.							Ana	lysis	Rec	ueste	d				
Address: PO BOX 1588	Due Date Requeste	d:															Preservation Co N - None CB - ZnAcetate/NaC	
City: Mobile	TAT Requested (da	ys):						AS)									B - NaOH R - NaThioSO4	
State, Zip: AL, 36633	Compliance Projec	t: 🛆 Yes 🛆	No					s (MBAS)									D - HNO3	
Phone: 251-441-2502	PO #: Purchase Order	Requested			j.			Substances										
Email: Rehman.Siddiqui@alports.com	WO #:				li sonak	1		ive Sut										
Project Name: ASD - McDuffie Coal Terminal 2C	Project #						Blue Active		le c		<u>و</u>					Cother:		
Site:	SSOW#:				(<u>114</u>)			lene Bl	e. Total	me. Fe	45.1	3 - Sulfi					Other:	
EUROFINS MOBILE 700		Sample	Sample Type (C=comp,	Matrix (W=wate S=solid, O=wasta/0			160.2 - TSS	5540C - Methylene 276 2 - Sulfide	335.2 - Cvanide.	9222D - Coliforms, Fecal	200.7_CWA, 245.1	SM4500SO3_B - Sulfite						
Sample Identification	Sample Date	Time	G=grab)	BT=Tissue, A	=Air)		160	554	335	922	200	SN					Special Ir	structions/Note:
				<u> 1945</u>														
0	2-14-25	10 DAV	G	Wate	r					_		ļ						
								+		-	-	t		1				
						+				+-	+	 						
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						╉╌┼					+			+	┝┈┼╴			
						┢╌┝												
Possible Hazard Identification						Sam	iple [Dispo	sal (.	A fee	e may	be a	ssesse)isposa	difsa	mples	are reta	ined longer than 1 rchive For	
Non-Hazard Flammable Skin Irritant Pois Deliverable Requested: I, II, III, IV, Other (specify)	on B — Unkn	own — I	Radiological					tum T Istruc						By La	0	A	cnive For	Months
											.oqui							
Empty Kit Relinquished by:		Date:			Ti	ime:			\checkmark	2		_	Me	thod of	Shipment			10
Relinquished by: Ray Siddy	Date/Time: 2-14-25	11:08		AS	QA	-	Receiv	Ţ	Ľ	2	E	2				-14-2	5 1300	Company
Relinquished by:	Date/Time:	5		Company			Receiv								Date/Tin			Company
Relinquished by:	Date/Time:			Company			Receiv				V				Date/Tin	^{ne:} 2//ς	1/25 1530	Company
Custody Seals Intact: Custody Seal No.:	_					C	Cooler Temperature(s) $^{\circ}$ C and Other Remarks: $(1.3)^{\circ}$											

Client: Alabama State Docks

Login Number: 270993 List Number: 1

Creator: Pardonner, Brett

Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>N/A</td> <td></td>	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	4.3°C IR10
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	False	

14

Client: Alabama State Docks

Login Number: 270993 List Number: 4

Creator: Pinette, Meadow L

Question	Answer	Comment
Radioactivity wasn't checked or is = background as measured by a survey meter.</td <td>True</td> <td></td>	True	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	N/A	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	N/A	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Job Number: 400-270993-2

List Source: Eurofins St. Louis List Creation: 02/18/25 12:55 PM

14

EPA I.D. NUMBER (copy from Item 1 of Form 1)

Please print or type in the unshaded areas only.

Form Approved. OMB No. 2040-0086. Approval expires 3-31-98.

FORM 2C NPDES	€E	PA		EXISTING		PLICATION F TURING, C	or Permit 1 Ommercia	L PROTECTION AGENCY TO DISCHARGE WASTEWATER IL, MINING AND SILVICULTURE OF Permits Program	ERATIONS	
I. OUTFAL	L LOCATION	1								
For each of	outfall, list the	latitude and	longitude of it	s location to	the nearest 1	5 seconds an	d the name of	the receiving water.		
			B. LATITUDE			. LONGITUD	-			
(4	list)	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	D. RECEIVING WATER	(name)	
II. FLOWS	, SOURCES	OF POLLUTI	ION, AND TR	EATMENT T	ECHNOLOGI	ES				
labeled treatme source B. For ea	I to correspor ent units, and s of water and ch outfall, pro orm water ru	nd to the more outfalls. If a d any collection ovide a descri	e detailed des water balance on or treatme ription of: (1)	scriptions in li e cannot be o nt measures. All operation	tem B. Constr determined (e s contributing	uct a water b .g., for certain wastewater	alance on the n mining activi	perations contributing wastewater to the eff line drawing by showing average flows bei <i>ities</i>), provide a pictorial description of the , including process wastewater, sanitary w nent received by the wastewater. Continu	tween intakes, nature and am vastewater, co	operations, nount of any oling water,
	, ary.		RATION(S) CO		G ELOW			3. TREATMENT		
1. OUT- FALL		2. 01 EI			AVERAGE F			0. Hte/thielth	b. LIST COI	
NO. (list)	a.	OPERATION	N (list)	D.	(include unit			a. DESCRIPTION	TABLE	
									+	
									+	
				_						
									+	
									+	
									+	
									+	
OFFICIAL	USE ONLY	(effluent guide)	lines sub-categ	ories)						

L

CONTINUED FROM THE FRONT

C. Except for st				of the discharges	described in It			sonal?				
	YES (comple	ete the follov	wing table)		L	NO (go to Sec	ction III)					
						EQUENCY			4. FLOW			
			PERATION(s)		a. DAYS PER WEEK	b. MONTHS	a. FLOW RA	TE (in mgd)		L VOLUME with units)		
1. OUTFALL NUMBER (list)		CONTR	(<i>list</i>)	N	(specify average)	PER YEAR (specify average)	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERI AVERAGE	A 2. MAXIM DAILY		
							, THE I WIGE	D/ III I	THEITIGE	0,1121		
III. PRODUCTIO												
		e limitation	promulgated	I by EPA under S	ection 304 of t	the Clean Water	Act apply to you	ır facility?				
	YES (comple			by El Atunder o		NO (go to Sec						
B. Are the limita	ations in the a	applicable e	effluent guide	eline expressed ir	terms of prod	luction (or other	measure of ope	ration)?				
	YES (comple	ete Item III-0	C)		[NO (go to Sec	ction IV)					
				ntity which repres fected outfalls.	ents an actual	I measurement	of your level of p	production, exp	pressed in the	terms and	units used in the	
	Indent guider			ERAGE DAILY F	RODUCTION	1						
a. QUANTITY	PER DAY	b UNITS	6 OF MEASU			ON, PRODUCT,	C.		FECTED O list outfall nu			
u		0.0				(specify)						
IV. IMPROVEM												
											is of wastewater t is not limited to,	
permit cond				orders, enforcen	nent compliand	_	•	court orders, a	and grant or lo	an condition	S.	
	YES (comple	ete the follov	wing table)		L	NO (go to Iter	m IV-B)					
1. IDENTIFICA	TION OF CO		2. AF	FECTED OUTFA	LLS	3. BRIEF	DESCRIPTION	OF PROJECT	г 4.	FINAL COM	IPLIANCE DATE	
AGRE	EIVIENT, ETC	J	a. NO.	b. SOURCE OF D	ISCHARGE				a.	REQUIRED	b. PROJECTED	
											may affect your ed schedules for	
construction	1. I						2 1	,	, ,			
	, mark "X" if	F DESCRIF	PTION OF A	DDITIONAL CON	TROL PROGE	RAMS IS ATTAC	CHED					

EPA I.D. NUMBER (copy from Item 1 of Form 1)

V. INTAKE AND EFFLUENT CHARACTER			
A, B, & C: See instructions before proceed		outfall Annotate the outfall number in the	
	-C are included on separate sheets number		space provided.
D. Use the space below to list any of the p		tions, which you know or have reason to b	elieve is discharged or may be discharged data in your possession.
1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
	2: 000:002		
VI. POTENTIAL DISCHARGES NOT COVE			
Is any pollutant listed in Item V-C a substan	ice or a component of a substance which yo	ou currently use or manufacture as an inter	mediate or final product or byproduct?
YES (list all such pollutants b	pelow)	NO (go to Item VI-B)	

VII. BIOLOGICAL TOXICITY TESTING DAT			
	ieve that any biological test for acute or chronic toxi	city has been made on any of your dis	scharges or on a receiving water in
relation to your discharge within the last 3 ye			
YES (identify the test(s) and de	scribe their purposes below)	NO (go to Section VIII)	
VIII. CONTRACT ANALYSIS INFORMATION	1		
	performed by a contract laboratory or consulting firm	12	
		_	
YES (list the name, address, an each such laboratory or fir	d telephone number of, and pollutants analyzed by, m below)	NO (go to Section IX)	
A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)
IX. CERTIFICATION			with a system designed to assure that
I certify under penalty of law that this docun qualified personnel properly gather and ev	nent and all attachments were prepared under my d aluate the information submitted. Based on my ind ation, the information submitted is, to the best of my	uiry of the person or persons who	manage the system or those persons
I certify under penalty of law that this docum qualified personnel properly gather and ev directly responsible for gathering the inform are significant penalties for submitting false		uiry of the person or persons who i knowledge and belief, true, accurate isonment for knowing violations.	manage the system or those persons
I certify under penalty of law that this docum qualified personnel properly gather and ev directly responsible for gathering the inform	aluate the information submitted. Based on my inc ation, the information submitted is, to the best of my	uiry of the person or persons who i knowledge and belief, true, accurate	manage the system or those persons
I certify under penalty of law that this docum qualified personnel properly gather and ev directly responsible for gathering the inform are significant penalties for submitting false	aluate the information submitted. Based on my inc ation, the information submitted is, to the best of my	uiry of the person or persons who i knowledge and belief, true, accurate isonment for knowing violations.	manage the system or those persons
I certify under penalty of law that this docum qualified personnel properly gather and ev directly responsible for gathering the inform are significant penalties for submitting false	aluate the information submitted. Based on my inc ation, the information submitted is, to the best of my	uiry of the person or persons who i knowledge and belief, true, accurate isonment for knowing violations.	manage the system or those persons

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (*use the same format*) instead of completing these pages. SEE INSTRUCTIONS.

EPA I.D. NUMBER (copy from Item 1 of Form 1)

OUTFALL NO. V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C) PART A -You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details. 3. UNITS 4. INTAKE 2. EFFLUENT (specify if blank) (optional) b. MAXIMUM 30 DAY VALUE c. LONG TERM AVRG. VALUE a. LONG TERM a. MAXIMUM DAILY VALUE (if available) (if available) AVERAGE VALUE a. CONCENb. NO. OF d. NO. OF (1) CONCENTRATION (1) CONCENTRATION (1) CONCENTRATION 1. POLLUTANT ANALYSES TRATION b. MASS ANALYSES (2) MASS (2) MASS (1) CONCENTRATION (2) MASS (2) MASS a. Biochemical Oxygen Demand (BOD) b. Chemical Oxygen Demand (COD) c. Total Organic Carbon (TOC)d. Total Suspended Solids (TSS) e. Ammonia (as N) VALUE VALUE VALUE VALUE f. Flow VALUE VALUE VALUE VALUE g. Temperature °C (winter) VALUE VALUE VALUE VALUE h. Temperature °C (summer) MINIMUM MAXIMUM MINIMUM MAXIMUM i. pH STANDARD UNITS PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements. 2. MARK "X" 3. EFFLUENT 4. UNITS 5. INTAKE (optional) 1. POLLUTANT b. MAXIMUM 30 DAY VALUE c. LONG TERM AVRG. VALUE a. LONG TERM AVERAGE AND a. MAXIMUM DAILY VALUE (if available) (if available) VALUE a. b. CAS NO. d. NO. OF a. CONCENb. NO. OF BELIEVED BELIEVED (1)(1) (1) (1) ANALYSES TRATION b. MASS ANALYSES (if available) PRESENT ABSENT CONCENTRATION (2) MASS CONCENTRATION (2) MASS CONCENTRATION CONCENTRATION (2) MASS (2) MASS a. Bromide (24959-67-9) b. Chlorine, Total Residual c. Color 330,000,000 d. Fecal Coliform e. Fluoride (16984-48-8) f. Nitrate-Nitrite (as N)

ITEM V-B CONT			-							1				
	2. MA	RK "X"				EFFLUENT				4. UNI	TS		AKE (optiond	al)
1. POLLUTANT AND CAS NO.	a. BELIEVED	b.	a. MAXIMUM DA	ILY VALUE	b. MAXIMUM 30 (<i>if availa</i>	DAY VALUE ble)	c. LONG TERM A (<i>if availa</i>	VRG. VALUE	d. NO. OF	a. CONCEN-		a. LONG TE AVERAGE V	ERM ALUE	b. NO. OF
(if available)	PRESENT	ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	b. MASS	(1) CONCENTRATION	(2) MASS	ANALYSES
g. Nitrogen, Total Organic (<i>as</i> <i>N</i>)														
h. Oil and Grease														
i. Phosphorus (as P), Total (7723-14-0)														
j. Radioactivity														
(1) Alpha, Total			1.0 +/- 2.3											
(2) Beta, Total			6.9 +/- 1.4											
(3) Radium, Total			0.6 +/- 0.2											
(4) Radium 226, Total			0.0 +/- 0.7											
k. Sulfate (as SO ₄) (14808-79-8)														
I. Sulfide (as S)														
m. Sulfite (<i>as SO</i> ₃) (14265-45-3)														
n. Surfactants														
o. Aluminum, Total (7429-90-5)														
p. Barium, Total (7440-39-3)														
q. Boron, Total (7440-42-8)														
r. Cobalt, Total (7440-48-4)														
s. Iron, Total (7439-89-6)														
t. Magnesium, Total (7439-95-4)														
u. Molybdenum, Total (7439-98-7)														
v. Manganese, Total (7439-96-5)														
w. Tin, Total (7440-31-5)														
x. Titanium, Total (7440-32-6)														

EPA I.D. NUMB	ER (copy from Item	1 of Form 1)	OUTFALL NUMBER
---------------	--------------------	--------------	----------------

CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions), mark "X" in column 2-b for each pollutant, you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you wastewater outfalls, and nonrequired GC/MS fractions), mark "X" in column 2-b for each pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for that pollutant you discharge in concentrations of 100 pb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (all 7 pages) for each outfall. See instructions for additional details and requirements.

		2. MARK "X				3 F	FFLUENT			4. UNITS 5. INTAKE (op.				1)	
1. POLLUTANT AND	a.	b.	C.	a. MAXIMUM DA		b. MAXIMUM 30 (<i>if availa</i>	DAY VALUE	c. LONG TERM VALUE (<i>if ava</i>					a. LONG T AVERAGE V	ERM	
CAS NUMBER (if available)	TESTING REQUIRED	BELIEVED PRESENT	BELIEVED ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	(1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
METALS, CYANIDI	E, AND TOT	AL PHENC	DLS												
1M. Antimony, Total (7440-36-0)					<0.000'	7									
2M. Arsenic, Total (7440-38-2)					<0.000	3									
3M. Beryllium, Total (7440-41-7)					<0.000	06									
4M. Cadmium, Total (7440-43-9)					<0.000	07									
5M. Chromium, Total (7440-47-3)					<0.000	1									
6M. Copper, Total (7440-50-8)					<0.000	L									
7M. Lead, Total (7439-92-1)					<0.000	1									
8M. Mercury, Total (7439-97-6)					0.0000	06									
9M. Nickel, Total (7440-02-0)					0.0003										
10M. Selenium, Total (7782-49-2)					0.0004										
11M. Silver, Total (7440-22-4)					<0.000	1									
12M. Thallium, Total (7440-28-0)					<0.000	3									
13M. Zinc, Total (7440-66-6)															
14M. Cyanide, Total (57-12-5)					<0.000	3									
15M. Phenols, Total					<0.000	3									
DIOXIN															
2,3,7,8-Tetra- chlorodibenzo-P- Dioxin (1764-01-6)				DESCRIBE RESU	JLTS										

		2. MARK "X	,			3. E	FFLUENT				4. UN	ITS	5. INTA	AKE (optiona	d)
1. POLLUTANT						b. MAXIMUM 30 [DAY VALUE	c. LONG TERM			-	-	a. LONG T	ERM	Í
AND CAS NUMBER	a. TESTING	b. BELIEVED	C. BELIEVED	a. MAXIMUM DA (1)	ILY VALUE	(if availat (1)	ble)	(1) VALUE (<i>if ava</i>	vilable)	d. NO. OF	a. CONCEN-		AVERAGE \ (1)	ALUE	b. NO. OF
(if available)	REQUIRED	PRESENT	ABSENT	CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS	ANALYSES	TRATION	b. MASS	CONCENTRATION	(2) MASS	ANALYSES
GC/MS FRACTION	I – VOLATIL	E COMPO	JNDS	1						•					
1V. Accrolein (107-02-8)					<0.001										
2V. Acrylonitrile (107-13-1)					<0.000	2									
3V. Benzene (71-43-2)					<0.000	02									
4V. Bis (<i>Chloro-</i> <i>methyl</i>) Ether (542-88-1)					<0.000	3									
5V. Bromoform (75-25-2)					<0.000	05									
6V. Carbon Tetrachloride (56-23-5)					<0.000	03									
7V. Chlorobenzene (108-90-7)					<0.000)3									
8V. Chlorodi- bromomethane (124-48-1)					<0.000	03									
9V. Chloroethane (75-00-3)					<0.000)5									
10V. 2-Chloro- ethylvinyl Ether (110-75-8)					<0.0002	L									
11V. Chloroform (67-66-3)					<0.000	04									
12V. Dichloro- bromomethane (75-27-4)					<0.000)3									
13V. Dichloro- difluoromethane (75-71-8)					<0.000										
14V. 1,1-Dichloro- ethane (75-34-3)					<0.000	03									
15V. 1,2-Dichloro- ethane (107-06-2)					<0.000	03									
16V. 1,1-Dichloro- ethylene (75-35-4)					<0.000	03									
17V. 1,2-Dichloro- propane (78-87-5)					<0.000	03									
18V. 1,3-Dichloro- propylene (542-75-6)					<0.000	03									
19V. Ethylbenzene (100-41-4)					<0.000	03									
20V. Methyl Bromide (74-83-9)					<0.000	07									
21V. Methyl Chloride (74-87-3)					<0.000	06									

CONTINUED FROM THE FRONT

	2	2. MARK "X	,			3. E	FFLUENT				4. UN	ITS	5. INTA	KE (optional	<i>l</i>)
1. POLLUTANT AND	_	Ŀ		a. MAXIMUM DA		b. MAXIMUM 30 I (if availat		c. LONG TERN VALUE (<i>if ava</i>					a. LONG T AVERAGE V		
CAS NUMBER (if available)	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	(1) CONCENTRATION		(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	(1) CONCENTRATION		b. NO. OF ANALYSES
GC/MS FRACTION	I – VOLATIL	E COMPO	JNDS (cont				. ,	I	()				1	. ,	
22V. Methylene Chloride (75-09-2)					<0.000	2									
23V. 1,1,2,2- Tetrachloroethane (79-34-5)					<0.000	03									
24V. Tetrachloro- ethylene (127-18-4)					<0.000	04									
25V. Toluene (108-88-3)					<0.000	05									
26V. 1,2-Trans- Dichloroethylene (156-60-5)					<0.000	03									
27V. 1,1,1-Trichloro- ethane (71-55-6)					<0.000	03									
28V. 1,1,2-Trichloro- ethane (79-00-5)					<0.000	03									
29V Trichloro- ethylene (79-01-6)					<0.000	03									
30V. Trichloro- fluoromethane (75-69-4)					<0.000)3									
31V. Vinyl Chloride (75-01-4)					<0.000	03									
GC/MS FRACTION	I – ACID CC	MPOUNDS	3					•					•		
1A. 2-Chlorophenol (95-57-8)					<0.000	1									
2A. 2,4-Dichloro- phenol (120-83-2)					<0.000	2									
3A. 2,4-Dimethyl- phenol (105-67-9)					<0.000	2									
4A. 4,6-Dinitro-O- Cresol (534-52-1)					<0.000	1									
5A. 2,4-Dinitro- phenol (51-28-5)					<0.000	2									
6A. 2-Nitrophenol (88-75-5)					<0.000	3									
7A. 4-Nitrophenol (100-02-7)					<0.000	L									
8A. P-Chloro-M- Cresol (59-50-7)					<0.000	2									
9A. Pentachloro- phenol (87-86-5)					<0.000)9									
10A. Phenol (108-95-2)					<0.000	2									
11A. 2,4,6-Trichloro- phenol (88-05-2)					<0.000	2									

EPA Form 3510-2C (8-90)

CONTINUED FROM PAGE V-4

CONTINUE ON REVERSE

CONTINUED FRO	M THE FRO	DNT													
	2	2. MARK "X	"				EFFLUENT			-	4. UN	ITS	5. INTAKE (optional)		
1. POLLUTANT AND	a.	b.	С.	a. MAXIMUM DA	ILY VALUE	b. MAXIMUM 30 (if availa	DAY VALUE	c. LONG TERM VALUE (<i>if avd</i>	1 AVRG. uilable)				a. LONG T AVERAGE \		b. NO. OF
CAS NUMBER (if available)	REQUIRED		ABSENT	CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	a. CONCEN- TRATION	b. MASS	(1) CONCENTRATION	(2) MASS	ANALYSES
GC/MS FRACTION	– BASE/N	EUTRAL CO	DMPOUND	S		-									
1B. Acenaphthene (83-32-9)					<0.000	01									
2B. Acenaphtylene (208-96-8)					<0.000	01									
3B. Anthracene (120-12-7)					<0.000	01									
4B. Benzidine (92-87-5)					<0.001										
5B. Benzo (<i>a</i>) Anthracene (56-55-3)					<0.000	01									
6B. Benzo (<i>a</i>) Pyrene (50-32-8)					<0.000	007									
7B. 3,4-Benzo- fluoranthene (205-99-2)					<0.000	009									
8B. Benzo (<i>ghi</i>) Perylene (191-24-2)					<0.000	01									
9B. Benzo (<i>k</i>) Fluoranthene (207-08-9)					<0.000	01									
10B. Bis (2-Chloro- ethoxy) Methane (111-91-1)					<0.000	01									
11B. Bis (2-Chloro- ethyl) Ether (111-44-4)					<0.000	2									
12B. Bis (2- Chloroisopropyl) Ether (102-80-1)															
13B. Bis (2-Ethyl- hexyl) Phthalate (117-81-7)					<0.000	1									
14B. 4-Bromophenyl Phenyl Ether (101-55-3)					<0.000	01									
15B. Butyl Benzyl Phthalate (85-68-7)					<0.000	1									
16B. 2-Chloro- naphthalene (91-58-7)					<0.000	009									
17B. 4-Chloro- phenyl Phenyl Ether (7005-72-3)					<0.000	1									
18B. Chrysene (218-01-9)					<0.000	01									
19B. Dibenzo (<i>a</i> , <i>h</i>) Anthracene (53-70-3)					<0.000	02									
20B. 1,2-Dichloro- benzene (95-50-1)					<0.000	01									
21B. 1,3-Di-chloro- benzene (541-73-1)					<0.000	01									

EPA Form 3510-2C (8-90)

	2. MARK "X"						FFLUENT				4. UN	ITS	5. INTA	<i>l</i>)	
1. POLLUTANT AND	a.	h	C	a. MAXIMUM DA		b. MAXIMUM 30 [(if availab		c. LONG TERM VALUE (if ava					a. LONG T AVERAGE V		
CAS NUMBER (if available)		b. BELIEVED PRESENT	BELIEVED ABSENT	(1) CONCENTRATION		(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	(1) CONCENTRATION		b. NO. OF ANALYSES
GC/MS FRACTIO					(1) 111 100		(2) 110 100	CONCENTION	(2) 11/ 100	1			Concentration	(2) 113 100	
22B. 1,4-Dichloro- benzene (106-46-7)					<0.000	01									
23B. 3,3-Dichloro- benzidine (91-94-1)					<0.000	2									
24B. Diethyl Phthalate (84-66-2)					<0.000	02									
25B. Dimethyl Phthalate (131 -11-3)					<0.000	01									
26B. Di-N-Butyl Phthalate (84-74-2)					<0.000	2									
27B. 2,4-Dinitro- toluene (121-14-2)					<0.000										
28B. 2,6-Dinitro- toluene (606-20-2)					<0.000										
29B. Di-N-Octyl Phthalate (117-84-0)					<0.000	01									
30B. 1,2-Diphenyl- hydrazine (<i>as Azo-</i> <i>benzene</i>) (122-66-7)					<0.000										
31B. Fluoranthene (206-44-0)					<0.000										
32B. Fluorene (86-73-7)					<0.000										
33B. Hexachloro- benzene (118-74-1)					<0.000										
34B. Hexachloro- butadiene (87-68-3)					<0.000										
35B. Hexachloro- cyclopentadiene (77-47-4)					<0.000	2									
36B Hexachloro- ethane (67-72-1)					<0.000	3									
37B. Indeno (<i>1,2,3-cd</i>) Pyrene (193-39-5)					<0.000										
38B. Isophorone (78-59-1)					<0.000										
39B. Naphthalene (91-20-3)					<0.000										
40B. Nitrobenzene (98-95-3)					<0.000	008									
41B. N-Nitro- sodimethylamine (62-75-9)					<0.000	2									
42B. N-Nitrosodi- N-Propylamine (621-64-7)					<0.000	2									

CONTINUED FROM PAGE V-6

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2. MARK "X"		13			3. E	FFLUENT			4. UN	ITS	5. INTA	AKE (optiona	d)	
1. POLLUTANT AND	a.	h	C C	a. MAXIMUM DA		b. MAXIMUM 30 I (<i>if availa</i> l		c. LONG TERM VALUE (<i>if ava</i>						
CAS NUMBER (if available)	TESTING	b. BELIEVED PRESENT	BELIEVED ABSENT	(1) CONCENTRATION		(1) CONCENTRATION		(1) CONCENTRATION		 a. CONCEN- TRATION	b. MASS	(1)		b. NO. OF ANALYSES
GC/MS FRACTION					()		()		()				()	
43B. N-Nitro- sodiphenylamine (86-30-6)					<0.000	01								
44B. Phenanthrene (85-01-8)					<0.000	01								
45B. Pyrene (129-00-0)					<0.000	01								
46B. 1,2,4-Tri- chlorobenzene (120-82-1)					<0.000	01								
GC/MS FRACTION	N – PESTIC	IDES												
1P. Aldrin (309-00-2)					<0.000	0002								
2P. α-BHC (319-84-6)					<0.000	0002								
3P. β-BHC (319-85-7)					<0.000	002								
4P. γ-BHC (58-89-9)					<0.000	0001								
5P. δ-BHC (319-86-8)					<0.000	008								
6P. Chlordane (57-74-9)					<0.000	0002								
7P. 4,4'-DDT (50-29-3)					<0.000	0001								
8P. 4,4'-DDE (72-55-9)					<0.000	0002								
9P. 4,4'-DDD (72-54-8)					<0.000									
10P. Dieldrin (60-57-1)					<0.000									
11P. α-Enosulfan (115-29-7)					<0.000	0002								
12P. β-Endosulfan (115-29-7)					<0.000	0005								
13P. Endosulfan Sulfate (1031-07-8)					<0.000									
14P. Endrin (72-20-8)					<0.000	0002								
15P. Endrin Aldehyde (7421-93-4)					<0.000	0002								
16P. Heptachlor (76-44-8)					<0.000	0002								

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CONTINUED FROM THE FRONT

CONTINUE ON PAGE V-9

				EPA	EPA I.D. NUMBER (copy from Item 1 of Form 1) OUTFALL NUMBER										
CONTINUED FRO	M PAGE V-8	3													
	2	. MARK "X'	,		3. EFFLUENT					4. UN	ITS	5. INT/	AKE (optiona	ıl)	
1. POLLUTANT AND	a.	b.	С.	a. MAXIMUM DA	ILY VALUE	b. MAXIMUM 30 (if availa		c. LONG TERN VALUE (<i>if ava</i>			001051		a. LONG T AVERAGE \		
CAS NUMBER (if available)	TESTING REQUIRED	BELIEVED PRESENT		(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	(1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION	– PESTICI	DES (contin	ued)												
17P. Heptachlor Epoxide (1024-57-3)					<0.000	0002									
18P. PCB-1242 (53469-21-9)					<0.000	002									
19P. PCB-1254 (11097-69-1)					<0.000	004									
20P. PCB-1221 (11104-28-2)					<0.000	01									
21P. PCB-1232 (11141-16-5)					<0.000	006									
22P. PCB-1248 (12672-29-6)					<0.000	001									
23P. PCB-1260 (11096-82-5)					<0.000	002									
24P. PCB-1016 (12674-11-2)					<0.000	003									
25P. Toxaphene (8001-35-2)					<0.000	02									

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PHYSICAL TREATMENT PROCESSES

1-A. Ammonia Stripp 1-B. Dialysis 1-C. Diatomaceous E 1-D. Distillation 1-E. Electrodialysis 1-F. Evaporation 1-G. Flocculation 1-H. Flotation 1-H. Flotation 1-J. Form Fractional 1-J. Freezing	Earth Filtration	1–Q 1–R 1–S 1–T 1–U	Microstraining Mixing Moving Bed Filters Multimedia Filtration Rapid Sand Filtration Reverse Osmosis (<i>Hyperfiltration</i>) Screening Sedimentation (<i>Settling</i>)
	paration	1–U	Sedimentation (<i>Settling</i>) Slow Sand Filtration Solvent Extraction

CHEMICAL TREATMENT PROCESSES

2–A 0	Carbon Adsorption	2–G	Disinfection (Ozone)
2–B (Chemical Oxidation	2–H	Disinfection (Other)
2–C	Chemical Precipitation	2–I	Electrochemical Treatment
2–D (Coagulation	2–J	Ion Exchange
2–E	Dechlorination	2–K	Neutralization
2–F[Disinfection (Chlorine)	2–L	Reduction

BIOLOGICAL TREATMENT PROCESSES

3–A	Activated Sludge	3–E	Pre-Aeration
3–В	Aerated Lagoons	3–F	Spray Irrigation/Land Application
3–C	Anaerobic Treatment		Stabilization Ponds
3–D	Nitrification-Denitrification	3–Н	Trickling Filtration

OTHER PROCESSES

4–A Discharge to Surface Water	4–C Reuse/Recycle of Treated Effluent
4–B Ocean Discharge Through Outfall	4-D Underground Injection

SLUDGE TREATMENT AND DISPOSAL PROCESSES

5–A	Aerobic Digestion	5–M	Heat Drying
5–B	Anaerobic Digestion	5– <mark>N</mark>	Heat Treatment
5–C	Belt Filtration	5–O	Incineration
5–D	Centrifugation	5–P	Land Application
5–E	Chemical Conditioning	5–Q	Landfill
5–F	Chlorine Treatment	5–R	Pressure Filtration
5–G	Composting	5–S	Pyrolysis
5–H	Drying Beds	5–T	Sludge Lagoons
5–I	Elutriation	5–U	Vacuum Filtration
5–J	Flotation Thickening	5–V	Vibration
5–K	Freezing	5–W	Wet Oxidation
5–L	Gravity Thickening		

	General Instructions for Report	rting	, Sampling, and Analysis					
Important note: Read these instruct	ions before completing Tables A		Concentration	Mass				
hrough E and Section 7 of Form 2C.			ppm = parts per million	lbs. = pounds				
General Items			mg/L = milligrams per liter	ton = tons (English tons)				
	ach outfall at your facility. Be sure to		ppb = parts per billion	mg = milligrams				
note the EPA Identification Number,			µg/L = micrograms per liter MPN = most probable number	g = grams kg = kilograms				
	at the top of each page of the tables	per 100 milliliters T = tonnes (metric tons)						
and any associated attachments.								
You may report some or all of the rec sheets of paper instead of completing your outfalls so long as the sheets co and are similar in format to Tables A able to print a report in a compatible your GC/MS analysis completed und	g Tables A through E for each of ontain all of the required information through E. For example, you may be format from the data system used in		etal," unless: An applicable, promulgated E metal in dissolved, valent, or t					
Table A requires you to report at leas		•	only its dissolved form (e.g., h	ds for the metal inherently measure exavalent chromium): or				
listed. Tables B through D require yo		•		etermined that in establishing case				
ways. For some pollutants, you may				sary to express the limitations of the				
"Testing Required" column and test a in your discharge whether or not you	and report the levels of the pollutants expect them to be present in your			otal form to carry out the provisions				
discharge. For all other pollutants, yo		No	ote that you are <i>not</i> required to co	omplete the "Maximum Monthly				
"Believed Present" or "Believed Abse estimate and test for those you believ		Dis	scharge" and the "Long-Term Av	erage Daily Discharge" columns of				
exceptions). Base your determination		Tables A through C; however, these fields should be completed if da						
absent from your discharge on your l	· · ·	are	e available.					
maintenance chemicals, intermediate		If you measure only one daily value, complete the "Maximum Daily Discharge" columns of the tables and enter "1" in the "Number of						
and any previous analyses known to								
effluent. For example, if you manufac			alyses" columns. The NPDES p					
hose pesticides to be present in con			ditional analyses to further chara	, ,				
If you would expect a pollutant to be presence in your intake water, you m are not required to analyze for that p long-term average value of the "Intak instead provide intake data.	ust mark "Believed Present" but you ollutant. Instead, mark an "X" in the	For composite samples, the daily value is the total mass or average concentration found in a composite sample taken over the operating hours of the facility during a 24-hour period. For grab samples, the daily value is the arithmetic or flow-weighted total mass or average concentration found in a series of at least four grab samples taken						
Reporting of Effluent Data		over the operating hours of the facility during a 24-hour period.						
Report sampling results for all polluta concentration and total mass, except	for flow, temperature, pH, color,	va	you measure more than one dail lues are representative of your w ou must describe your method of	astestream, you must report them.				
and fecal coliform organisms. If you a Table D, report concentration only.	are reporting quantitative data under		•	e outfalls with substantially identical				
				thority may allow the applicant to				
Flow, temperature, pH, color, and fec reported as mgd, degrees Celsius (° most probable number per 100 millili Use the following abbreviations in the A through D.	C), standard units, color units, and ters (MPN/100 mL), respectively.	tes the rec ou	st only one outfall and report those e substantially identical outfall. If quest, attach a separate sheet to	the permitting authority grants your the application form identifying the e other outfall(s) are substantially				
Concentration	Mass	Reporting of Intake Data						
ppm = parts per million	lbs. = pounds		bu are not required to report data	under the "Intake" columns of				
mg/L = milligrams per liter	ton = tons (English tons)			h to demonstrate your eligibility for				
ppb = parts per billion µg/L = micrograms per liter	mg = milligrams g = grams			ore pollutants in Tables A through				
MPN = most probable number	kg = kilograms	(i.e	e., an effluent limitation adjusted	by subtracting the average level of				
per 100 milliliters	T = tonnes (metric tons)			ke water). NPDES regulations allow				
		ne	t limitations only in certain circur	nstances. To demonstrate your				

	EPA Identification Number	NPDE	S Permit Number		Facility Name		Outfall Number			OMB No. 2040-0004 Expires 07/31/2026			
TA	BLE A. CONVENTIONAL AND N		TIONAL POLLUTA	NTS (40 CF	R 122.21(g)(7)(ii		luent		Inta (optio				
	Pollutant	Waiver Requested (if applicable)	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses			
	Check here if you have applied	heck here if you have applied to your NPDES permitting authority for a waiver for all of the pollutants listed on this table for the noted outfall.											
1	Biochemical oxygen demand		Concentration										
1.	(BOD ₅)		Mass										
2.	Chemical oxygen demand		Concentration										
Ζ.	(COD)		Mass										
3.	Total organic carbon (TOC)		Concentration										
5.			Mass										
4.	Total suspended solids (TSS)		Concentration										
4.	Total suspended solids (199)		Mass										
5.	Ammonia (as N)		Concentration										
5.			Mass										
6.	Flow		Rate										
7.	Temperature (winter)		°C	°C									
1.	Temperature (summer)		°C	°C									
8.	pH (minimum)		Standard units	s.u.									
0.	pH (maximum)		Standard units	s.u.									

¹ Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

	EPA Identification Number		Permit Number		Facility Name			Dutfall Number					No. 2040-0004 es 07/31/2026
TABL	E B. TOXIC METALS, CYANIDE	, TOTAL PHE	Presence	ORGANIC T or Absence ck one)	OXIC POLLUTAN	TS (40 CFI	R 122.21(g)(7)	l(v)) ¹ Efflu	ent				a ke ional)
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Ave Monthly Discharge Disc		Term rage ily narge ilable)	Number of Analyses	Long- Term Average Value	Number of Analyses
	Check here if you qualify as a small business per the instructions to Form 2C and, therefore, do not need to submit quantitative data for any of the organic toxic pollutants in Sections 2 through 5 of this table. Note, however, that you must still indicate in the appropriate column of this table if you believe any of the pollutants listed are present in your discharge.												
Section	on 1. Toxic Metals, Cyanide, and Total Phenols												
1.1	Antimony, total (7440-36-0)				Concentration Mass								
1.2	Arsenic, total				Concentration								
	(7440-38-2) Beryllium, total				Mass Concentration								
1.3	(7440-41-7)				Mass								
1.4	Cadmium, total (7440-43-9)				Concentration Mass								
1.5	Chromium, total (7440-47-3)				Concentration								
	Copper, total				Mass Concentration								
1.6	(7440-50-8)				Mass								
1.7	Lead, total				Concentration								
	(7439-92-1)				Mass Concentration								
1.8	Mercury, total (7439-97-6)				Mass								
1.9	Nickel, total				Concentration								
	(7440-02-0)				Mass								
1.10	Selenium, total (7782-49-2)				Concentration Mass								
	Silver, total				Concentration								
1.11	(7440-22-4)				Mass								

EPA Identification Number NPDES Permit Number					Facility Name Outfall Number					OMB No. 2040-0004 Expires 07/31/2026			
TABL	TABLE B. TOXIC METALS, CYANIDE,		NOLS, AND ORGANIC Presence or Absence (check one)		OXIC POLLUTANTS (40 CF		ER 122.21(g)(7)(v)) ¹ Effluent					Intake (optional)	
	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long- Aver Da Disch (if avai	rage ily narge	Number of Analyses	Long- Term Average Value	Number of Analyses
1.12	Thallium, total (7440-28-0)				Concentration Mass								
1.13	Zinc, total (7440-66-6)				Concentration Mass								
1.14	Cyanide, total (57-12-5)				Concentration Mass								
1.15					Concentration Mass								
Section	on 2. Organic Toxic Pollutants ((GC/MS Fract	ion—Volatil	e Compound									<u> </u>
2.1	Acrolein (107-02-8)				Concentration Mass								
2.2	Acrylonitrile (107-13-1)				Concentration Mass								
2.3	Benzene (71-43-2)				Concentration Mass							 	
2.4	Bromoform (75-25-2)				Concentration Mass								
2.5	Carbon tetrachloride (56-23-5)				Concentration								
2.6	Chlorobenzene				Mass Concentration								
2.7	(108-90-7) Chlorodibromomethane				Mass Concentration							 	
2.1	(124-48-1)				Mass								
2.8	Chloroethane (75-00-3)				Concentration Mass								

EPA Identification Number NPDES Perm									OMB No. 2040-0004 Expires 07/31/2026			
TAB	BLE C. CERTAIN CO	NVENTIONAL AND NON CO Presence or Absence (check one)		NVENTIONAL POLLUTANTS		5 (40 CFR 122.21(g)(7)(vi))¹ Efflu		Intake (optional)			
	Pollutant	Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses	
	Check here if you believe all pollutants in Table C to be <i>present</i> in your discharge from the noted outfall. You need <i>not</i> complete the "Presence or Absence" column of Table C for <i>each</i> pollutant.											
	Check here if you believe all pollutants in Table C to be <i>absent</i> in your discharge from the noted outfall. You need <i>not</i> complete the "Presence or Absence" column of Table C for <i>each</i> pollutant.											
1.	Bromide (24959-67-9)			Concentration Mass								
2.	Chlorine, total residual			Concentration Mass								
3.	Color			Concentration Mass								
4.	Fecal coliform			Concentration Mass								
5.	Fluoride (16984-48-8)			Concentration Mass								
6	Nitrate-nitrite			Concentration Mass								
7.	Nitrogen, total organic (as N)			Concentration Mass								
8.	Oil and grease			Concentration Mass								
9.	Phosphorus (as P), total (7723-14-0)			Concentration Mass								
10.	Sulfate (as SO ₄) (14808-79-8)			Concentration Mass								
11.	Sulfide (as S)			Concentration Mass								

EPA Identification Number NPDES Perm		nit Number Facility Name			Outfall Number		OMB No. 2040-0004 Expires 07/31/2026				
TABLE C. CERTAIN CO		NVENTIONAL AND NON CO Presence or Absence (check one)		NVENTIONAL POLLUTANTS		S (40 CFR 122.21(g		Intake (optional)			
	Pollutant	Believed Believed Present Absent		Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
12.	Sulfite (as SO ₃) (14265-45-3)			Concentration							
	(14205-45-5)			Mass							-
13.	Surfactants			Concentration Mass							
				Concentration							
14.	Aluminum, total (7429-90-5)			Mass							
4.5	15 Barium, total			Concentration							
15.	(7440-39-3)			Mass							
16.	Boron, total			Concentration							
10.	(7440-42-8)			Mass							
17.	Cobalt, total (7440-48-4)		Concentration								
				Mass							
18.	Iron, total	Iron, total (7439-89-6)		Concentration							
	(7439-89-6)			Mass							
19.	Magnesium, total			Concentration							
	(7439-95-4)			Mass							
20.		Molybdenum, total (7439-98-7)		Concentration							
	(7439-98-7)			Mass							
21.	Manganese, total (7439-96-5)			Concentration							
				Mass							
22.	Tin, total			Concentration							<u> </u>
<u> </u>	(7440-31-5)			Mass							
23.	Titanium, total			Concentration							<u> </u>
20.	(7440-32-6)			Mass							

EPA Identification Number NPDES Pe		rmit Number Facility Name			Outfall Number		OMB No. 2040-0004 Expires 07/31/2026				
TAB	LE C. CERTAIN CO	NVENTIONA	L AND NON CO	NVENTIONAL PO	DLLUTANT	S (40 CFR 122.21(g)(7)(vi))¹				
	Pollutant	Presence or Absence (check one)		-		Effluent				Intake (optional)	
		Believed Present	Believed Absent	Units (specify)		Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
24.	Radioactivity										
	Alpha, total	П		Concentration							
	Alpha, lotai			Mass							
	Beta, total			Concentration							
				Mass							
	Radium, total			Concentration							
	Rauluin, lotai			Mass							
	Radium 226, total			Concentration							
				Mass							

¹ Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).



SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN

for

ALABAMA STATE PORT AUTHORITY McDUFFIE ISLAND COAL TERMINAL

1768 YEEND STREET MOBILE, ALABAMA 36603

MARCH 2017

Prepared by:

ALABAMA STATE PORT AUTHORITY Environmental & Program Management
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MANAGEMENT APPROVAL

Spill Prevention, Control, and Countermeasure (SPCC) Plan

for

McDuffie Island Coal Terminal

owned by

Alabama State Port Authority 250 N. Water Street Mobile, Alabama 36602

This plan has been reviewed by the management of the Alabama State Port Authority and has our full approval. We hereby adopt this SPCC Plan into the operation of our facility at the McDuffie Coal Terminal and agree to commit the necessary resources to implement the SPCC plan.

onatu

Brad Ojard Senior Vice President, Operations

3/29/17 (Date)

Schoure

(Signature)

<u>Smitty Thorne</u> Deputy Director, Chief Operating Officer

PROFESSIONAL ENGINEER'S CERTIFICATION

By means of this Professional Engineer Certification, I hereby attest to the following:

- I am familiar with the requirements of 40 CFR 112 (Oil Pollution Prevention);
- I and/or my agent have visited and examined the McDuffie Island Coal Terminal covered in this Plan;
- This Plan has been prepared in accordance with good engineering practice including consideration of applicable industry standards and in conformance with the requirements of 40 CFR 112;
- The required inspection and testing procedures have been established and Alabama State Port Authority has committed to following them.
- This Plan is adequate for the facility.

smena

(Signature) Gretchen L. Barrera, P.E. Registration No.: 33827 State of Registration: Alabama

(SEAL)



FIVE YEAR REVIEW FORM

Management shall review and evaluate this SPCC plan at least once every five years and document the review below. This SPCC plan will be amended within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event at the facility, and (2) such technology has been field-proven at the time of review.

I have completed a review and evaluation of the SPCC Plan for Alabama State Port Authority McDuffie Island Coal Terminal on this date and;

Will amend this Plan as a result. Will not amend the Plan as a result.

= with <u>not</u> affected the 1 fail as a

Comments:

Signature:

Gretchen Barrera

Printed Name:

Title: Environmental Section Manager

The next scheduled review date will be:

(5 years from above date).

Date

RECORD OF CHANGES AND REVISIONS

In accordance with 40 CFR 112.5, this SPCC plan shall be amended whenever there is a change in facility design, construction, operation, or maintenance, which materially affects the facility's potential for discharge of oil (into or upon navigable waters of the United States or adjoining shorelines) in quantities that may be harmful, as described in 40 CFR 110.

All revisions shall be documented below.

NON-TECHNICAL AMENDMENTS

- Non-technical amendments are not certified by a Professional Engineer.
- Examples of changes include, but are not limited to, phone numbers, name changes, or any non-technical text change(s).

TECHNICAL AMENDMENTS

- Technical amendments are certified by a Professional Engineer (§112.5(c)).
- Examples of changes include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility.
- An amendment made under this section will be prepared within six (6) months of the change and implemented as soon as possible but not later than six (6) months following preparation of the amendment.
- Technical amendments affecting various pages within the plan can be P.E. certified on those pages, certifying those amendments only, and will be documented on the log form below.

Revision ID	Page(s) Affected	Description	Signature (Specify) *	Revision Date	P.E. Cert. (Y/N)
А					

*Typically signed by Manager, Professional Engineer, or plan reviewer.

SCHEDULE FOR IMPLEMENTATION

In accordance with 40 CFR 112.7, if the SPCC plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, these items should be discussed in separate paragraphs, and the details of installation and operational start-up should be explained separately.

Listed in the following discussion are items of this SPCC Plan which are not yet fully operational at the time of issuance of this SPCC Plan.

Minor additional facilities or equipment necessary to implement this SPCC plan were identified related to containers owned by others. These facilities consist of:

- Coal Freight Forwarding Container ID No. H: Provide secondary containment for 250gallon motor oil tote or replace with a double-walled tank.
- Coal Freight Forwarding Container ID No. L: Provide spill pallets or other means of secondary containment beneath all 55-gallon storage drums to provide secondary containment and facilitate visual inspection.

SPCC regulations (40 CFR 112.5) require that amendments to the plan be fully implemented as soon as possible, and no later than six months after the plan amendment.

CROSS-REFERENCE TO 40 CFR 112 REGULATIONS

40 CFR 112 REGULATION	SPCC PLAN
SECTION NUMBER	SECTION NUMBER
40 CFR 112.7 – 1 st paragraph (un-numbered)	Management Approvalpage iv Schedule for Implementationpage viii Cross-referencepage ix
40 CFR 112.7 (a)(1)	1.0General Information 3.0Potential Spills – Prediction and Control 4.0Conformance with Specific Spill Prevention and Control Guidelines Table 1 Figures 1 - 3
40 CFR 112.7 (a)(2)	2.7Deviations from Requirements
40 CFR 112.7 (a)(3)	 3.0Potential Spills – Prediction and Control 4.0Conformance with Specific Spill Prevention and Control Guidelines 8.0Spill Contingency Procedures Table 1 Figures 1 – 3
40 CFR 112.7 (a)(4)	8.0Spill Contingency Procedures
40 CFR 112.7 (a)(5)	8.0Spill Contingency Procedures
40 CFR 112.7 (b)	3.0Potential Spills – Prediction and Control Table 1 Figure 3
40 CFR 112.7 (c)	 3.0Potential Spills – Prediction and Control 4.0Conformance with Specific Spill Prevention and Control Guidelines Table 1 Figures 1 – 3
40 CFR 112.7 (d)	 3.5Containment Practicability/Spill Contingency Commitment 8.0Spill Contingency Procedures Appendix CLetter of Intent from U.S. Environmental Services
40 CFR 112.7 (e)	5.0 Inspections, Tests, and Records Appendix B Inspection Procedures and Report Forms

CROSS-REFERENCE TO 40 CFR 112 REGULATIONS (CONTINUED)

40 CFR 112 REGULATION SECTION NUMBER	SPCC PLAN SECTION NUMBER
40 CFR 112.7 (f)	2.5Responsibility 7.0Personnel, Training, and Discharge Prevention Procedures
40 CFR 112.7 (g)	6.0Security
40 CFR 112.7 (h)	4.4 Facility Tank Car and Tank Truck Loading and Unloading Rack
40 CFR 112.7 (i)	Not Applicable (no field-constructed containers)
40 CFR 112.7 (j)	4.0 Conformance with Specific Spill Prevention and Control Guidelines
40 CFR 112.7 (k)	4.5 Oil-Filled Equipment
40 CFR 112.8 (b)	4.1Facility Drainage Control5.1Tests and Inspections
40 CFR 112.8 (c)	 3.2Designation of Oil Storage Areas 4.2Bulk Storage Containers 5.1Tests and Inspections Table 1
40 CFR 112.8 (d)	3.3Designation of Oil Transfer Locations4.3Facility Transfer Operations
40 CFR 112.9 and subsequent sections	Not Applicable
40 CFR 112 Appendix C	2.5Applicability of Substantial Harm Criteria Appendix ASignificant & Substantial Harm Criteria Certification

1.0 GENERAL PLAN REQUIREMENT

1.1 Introduction

The purpose of this Spill Prevention Control and Countermeasure (SPCC) Plan is to describe the measures implemented by Alabama State Port Authority (ASPA) to prevent oil discharges from occurring. This Plan also documents the processes used by ASPA to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the ASPA McDuffie Coal Terminal. This SPCC Plan has been prepared and implemented in accordance with the SPCC requirements contained in Title 40, Code of Federal Regulations (CFR), Part 112.

In addition to fulfilling the requirements of 40 CFR §112, this SPCC Plan may be used as a reference for oil storage information and inspection/testing records, as a tool to communicate practices on preventing and responding to discharges with McDuffie employees and contractors, as a guide for facility inspections, and as a resource during emergency response.

1.2 Applicability of Federal Regulations

U.S. Environmental Protection Agency (USEPA) regulation (40 CFR 112) establishes the requirements for preparation and implementation of a SPCC Plan for a non-transportation related facility with oil storage above certain threshold quantities (oil being loosely defined to include petroleum-related products, including various fuels and lubricating oils, as well as non-petroleum oils).

A facility is required to prepare a SPCC Plan if it has total underground storage capacity in excess of 42,000 gallons (excluding underground storage tanks that are subject to technical requirements of 40 CFR 280 or corollary state regulations), or has total aboveground storage capacity in excess of 1,320 gallons (counting only those containers with a capacity of 55 gallons or greater). As detailed in Section 2, McDuffie Coal Terminal meets the threshold of aboveground storage volume and therefore must comply with the SPCC requirements contained in Title 40, CFR Part 112.

1.2 Plan Availability

ASPA maintains this SPCC Plan at the McDuffie Administration Office and Environmental & Program Management Office. The SPCC Plan is available for review by employees, contractors, and representatives from State and Federal regulatory agencies for on-site review during normal working hours.

1.3 Plan Review

In accordance with 40 CFR §112.5, ASPA periodically reviews and evaluates this SPCC Plan for any changes in facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge. Plan review is documented on the form provided on p. vi at least once every five years. This form must be completed even if no amendment is made to the plan. Revisions to the plan, if needed, are documented on the

2.0 GENERAL FACILITY INFORMATION

2.1 Facility Description

The McDuffie Coal Terminal is located on McDuffie Island near the outlet of the Mobile River into Mobile Bay, as shown on the Site Vicinity Map (Figure 1). Other adjacent bodies of water are North Garrows Bend located west of McDuffie Island and Arlington Channel to the south. The facility is located within the city limits of Mobile, Alabama and is approximately 100 acres in area. The facility is also depicted on the Aerial Photograph (Figure 2).

The McDuffie Coal Terminal is operated by the Alabama State Port Authority as a dry handling facility for coal storage and transport. The terminal is equipped with ship loading and unloading berths, a ship unloader and double stacker/conveyor system that can handle both iron ore and coal, stacker-reclaimers, tandem and single railcar dumps, loop tracks around the facility for ease of coal car handling, and barge loader and unloaders. Figure 3 is an Oil Storage Container Location Plan for the terminal and shows the general locations of items referenced in the text of this report.

2.2 Facility Drainage Description

A site vicinity map showing property boundaries and topographic features of the area is shown on Figure 1. An Oil Storage Container Location Plan showing general drainage patterns, drainage diversionary structures, treatment structures, and treatment ponds is provided on Figure 3.

The site is generally flat with only shallow relief in the form of constructed swales, drainage ditches and other features such are concrete pads, roads, railroad beds, etc. The site is surrounded by a swale that keeps stormwater inside the site and prevents runoff. Railroad tracks are located in the middle of and to the west of the site. The Coal Terminal is drained to a series of pumping stations that pump excess water to detention ponds and finally to a sedimentation basin on the south side of the facility. The treated water is then discharged to Mobile Bay for final disposal.

2.3 Location and Contact Information

Facility Name:	Alabama State Port Authority McDuffie Coal Terminal
Facility Owner/Oper	ator: Alabama State Port Authority
Facility Location:	1768 Yeend Street Mobile, AL 36603 (See Figure 1 for Site Vicinity Map)
Mailing Address:	P.O. Box 1588 Mobile, AL 36633

SPCC Plan Facility Contacts:

Contact	Title	Office Phone	Cellular Phone
Scott Wallace	McDuffie Operations Manager	(251) 441-7316	(251) 408-7068
Scott McAfee	McDuffie Operations Supervisor	(251) 441-7664	(251) 422-1801
Gretchen Barrera	Environmental Section Manager	(251) 441-7086	(251) 622-4180

2.4 Oil Storage

The McDuffie Coal Terminal contains numerous bulk storage containers as shown on Figure 3. The bulk storage containers range in size from 55 gallon drums to 10,000 gallon aboveground storage tanks with a cumulative oil storage of 29,920 gallons. Table 1 provides the container size, material, and contents. The facility does not have any completely buried, partially buried or bunkered storage tanks onsite.

2.5 Responsibility

The McDuffie Operations Manager will be responsible for the implementation of the SPCC program. These responsibilities include establishing emergency procedures, SPCC employee training programs, proper reporting and records procedures and ensuring SPCC review and updates as required and needed. The McDuffie Operations Manager shall ensure that personnel are trained in the prevention, control countermeasure and reporting procedures for oil spills. Training sessions for oil handling personnel will be conducted annually to review discharge prevention measures and any known discharges from the facility.

2.6 Applicability of Substantial Harm Criteria

In accordance with 40 CFR 112.20(e), the "significant and substantial harm criteria" certification form required by Appendix C to 40 CFR 112 has been completed and is contained in Appendix A of this SPCC Plan. This facility does not meet the substantial harm criteria, and therefore is not required to prepare an "OPA 90" Facility Response Plan.

2.7 Deviations from Requirements

There are no deviations from the SPCC Requirement.

3.0 POTENTIAL SPILLS – PREDICTION AND CONTROL

3.1 Potential Spill Sources

All bulk storage containers, equipment, and operations have been evaluated for reasonable potential for failure. Potential failures identified include:

- tank leak and rupture/failure due to corrosion;
- tank rupture due to lightning strike;
- leak at connection;
- hose/pipe failure during transfer operations; and
- human error during transfer operations.

The purpose of this discussion is to describe the nature and characteristics of potential spill occurrences, and applicable control measures. Potential spills may occur with any of the following:

- equipment failure (e.g. tank rupture or leaks, leak in piping, malfunction of dispenser)
- operational errors (e.g. tank overfill, spillage)
- vandalism (tampering with tanks and dispensers), and
- damage to tanks, dikes, and dispensers during hurricanes, tornadoes, flood conditions, or other natural disasters.

Potential spills may be expected primarily at the oil storage areas and/or oil transfer areas. Potential spills may range from relatively minor occurrences (e.g. small leakage from valve) to major occurrences (e.g. catastrophic failure of a storage tank or spill from a single compartment of a fully loaded tanker truck).

Prevention of spills at the storage tanks and transfer areas will be accomplished most readily by routine visual inspection and maintenance of equipment (tanks, piping, connections and hoses) and by operational care during tank filling and transfer operations to prevent accidental overfill and/or spillage.

Table 1 provides capacities of various bulk oil storage containers (i.e., maximum volumes of potential spills) and, with reference to Figure 3, indicates the flow path of a potential spill.

3.2 Designation of Oil Storage Areas

An inventory of aboveground bulk oil storage containers is presented in Table 1, and a drawing showing bulk oil storage container locations is included in Figure 3. Table 1 and Figure 3 include locations where 55-gallon drums of oil may be stored along with notations

of the number of drums and the type of oil at each location.

Each container listed in Table 1, depicted on Figure 3, and described below may not be owned by the Alabama State Port Authority but may be part of on-site contractor operations. Containers owned and operated by others are identified on Table 1. Inspection, maintenance, and spill reporting shall be the responsibility of the owner and operator listed.

All aboveground tanks receive periodic visual inspections. On all external examinations, checks are made for signs of deterioration and leaks. All leaks found receive special maintenance priority. See Section 5.0 for further description of inspections and recordkeeping.

Caterpillar Diesel Generator (Container ID No. 1)

One Caterpillar Diesel Generator located at the 1901 Entrance Gate of facility as shown on Figure 3, approximately 975 feet West of Mobile Bay, the closest navigable body of water. This tank is of "double-walled" construction with the outer tank serving as secondary containment for the entire tank contents. It is designed in accordance with UL 142 for steel aboveground atmospheric tanks for flammable and combustible liquids. The tank is manufactured so that the interstitial space between the inner and outer tank walls can be monitored. Should oil be present in the interstitial space, the cause of the leak should be investigated and appropriate repairs implemented.

The tank is filled by a licensed motor carrier that will park the supply truck adjacent to the concrete walls surrounding the AST and fill the tank using a pump and hose. The immediate area where the fuel supply truck is parked does not have permanent secondary containment in the form of berms, curbing, drainage to sumps, or similar features. However, general topographic features at this location would direct a spill South into McDuffie import yard. The risk of impact on navigable waters from such a spill is considered minimal.

1,000-gallon Gasoline Fuel AST (Container ID No. 2)

One 1,000-gallon gasoline fuel AST is located southeast of the McDuffie Import storage yard, as shown in Figure 3, approximately 600 feet from the Mobile River, the closest navigable body of water. This tank is of "double-walled" construction with the outer tank serving as secondary containment for the entire tank contents. It is designed in accordance with UL 142 for steel aboveground atmospheric tanks for flammable and combustible liquids. The tank is manufactured so that the interstitial space between the inner and outer tank walls can be monitored. Should oil be present in the interstitial space, the cause of the leak should be investigated and appropriate repairs implemented.

The tank sits directly on the ground. The primary fill port for tank loading is equipped with spill protection.

The tank is filled by a licensed motor carrier that will park the supply truck adjacent to the metal dike and fill the tank using a pump and hose. The tank is surrounded on all four sides by concrete bollards to protect against impacts from vehicles. The immediate area where the supply truck is parked does not have permanent secondary containment in the form of berms, curbing, drainage to sumps, or similar features. However, general topographic features at this location would direct a spill east towards a depression in the yard. The risk of impact on navigable waters from such a spill is considered minimal.

3,000-gallon Diesel Fuel AST (Container ID No. 3)

One 3,000-gallon diesel fuel AST is located southeast of the McDuffie Import storage yard, as shown in Figure 3, approximately 600 feet from the Mobile River, the closest navigable body of water. This tank is of "double-walled" construction with the outer tank serving as secondary containment for the entire tank contents. It is designed in accordance with UL 142 for steel aboveground atmospheric tanks for flammable and combustible liquids. The tank is manufactured so that the interstitial space between the inner and outer tank walls can be monitored. Should oil be present in the interstitial space, the cause of the leak should be investigated and appropriate repairs implemented.

The tank sits directly on the ground. The primary fill port for tank loading is equipped with spill protection.

The tank is filled by a licensed motor carrier that will park the supply truck adjacent to the AST and fill the tank using a pump and hose. The tank is surrounded on all four sides by concrete bollards to protect against impacts from vehicles. The immediate area where the diesel fuel supply truck is parked does not have permanent secondary containment in the form of berms, curbing, drainage to sumps, or similar features. However, general topographic features at this location would direct a spill east toward a depression in the storage yard. Discharges directed to this portion of the storage area could be picked up with a vacuum truck. The risk of impact on navigable waters from such a spill is considered minimal.

280-gallon Used Oil AST, 250-gallon Motor Oil AST, 250-gallon Hydraulic Oil AST, and 100-gallon Motor Oil AST (Container ID No. 4)

Several ASTs along with drums are located inside the Mechanic's Shop identified as Container ID No. 4, on the northeast corner of the McDuffie Export area.

One 280-gallon used oil tank is of "double-walled" construction with the outer tank serving as secondary containment for the entire tank contents. The tank is designed in accordance with UL 142 for steel aboveground atmospheric tanks for flammable and combustible liquids. The tank is manufactured so that the interstitial space between the inner and outer tank walls can be electronically monitored. Should oil be present in the interstitial space, the cause of the leak should be investigated and appropriate repairs implemented. The tank is mounted on elevated supports to allow for complete visual inspection. Additionally, floor drains in the concrete floor of the shop direct any discharges to an oil-water separator located at the southwest corner of the building.

One 250-gallon motor oil AST, one 250-gallon hydraulic oil AST, and one 100-gallon motor oil tank are also located inside the Mechanic's Shop. The tanks are of "single-walled" construction and are mounted on elevated supports to allow for complete visual inspection. Secondary containment is provided by the oil-water separator connected to the floor drains in the concrete floor of the shop. Any discharge would be directed to the oil-water separator located at the southwest corner of the building. Discharges directed to this portion of the

storage area could be picked up with a vacuum truck.

The risk of impact on navigable waters from such a spill is considered minimal.

10,000-gallon Diesel Fuel AST and 8,000-gallon Gasoline AST (Container ID No. 7)

One 10,000-gallon diesel fuel AST and one 8,000-gallon gasoline AST are located together on the same concrete pad on the west side of McDuffie Island Coal Terminal as shown on Figure 3. The tanks are approximately 225 feet from Garrows Bend, the closest navigable body of water. These tanks are of "double-walled" construction with the outer tank serving as secondary containment for the entire tank contents. They are designed in accordance with UL 142 for steel aboveground atmospheric tanks for flammable and combustible liquids. The tanks are manufactured so that the interstitial space between the inner and outer tank walls can be electronically monitored. Should oil be present in the interstitial space, the cause of the leak should be investigated and appropriate repairs implemented.

The tanks are surrounded on all four sides by concrete bollards to protect against impacts from vehicles. The tanks are mounted on elevated supports to allow for complete visual inspection. The primary fill ports for tank loading are equipped with spill/overfill protection at the top of each tank. A dispenser pump and two nozzles are located near the same end of the tank where the fill ports are located. The nozzles have an automatic cutoff feature. Each tank has a manual cutoff switch for the nozzle.

The tanks are filled by a licensed motor carrier that will park the supply truck adjacent to the concrete bollards surrounding the ASTs and fill the tanks using a pump and hose. The immediate area where the fuel supply truck is parked does not have permanent secondary containment in the form of berms, curbing, drainage to sumps, or similar features. However, the general area of this tank and topographic features of the site do have drainage to allow for containment of spills that could occur during loading. The risk of impact on navigable waters from such a spill is considered minimal.

550-gallon Diesel Fuel AST (Container ID No. 8)

One 550-gallon diesel fuel AST is located Southwest corner of the facility near the coal spoil area, as shown in Figure 3, approximately 35 feet from Garrows Bend, the closest navigable body of water. This tank is of "double-walled" construction with the outer tank serving as secondary containment for the entire tank contents. It is designed in accordance with UL 142 for steel aboveground atmospheric tanks for flammable and combustible liquids. The tank is manufactured so that the interstitial space between the inner and outer tank walls can be monitored. Should oil be present in the interstitial space, the cause of the leak should be investigated and appropriate repairs implemented.

The tank sits directly on the ground. The primary fill port for tank loading is equipped with spill protection.

The tank is filled by a licensed motor carrier that will park the supply truck adjacent to the AST and fill the tank using a pump and hose. The immediate area where the diesel fuel supply truck is parked does not have permanent secondary containment in the form of berms,

curbing, drainage to sumps, or similar features. However, general topographic features at this location would direct a spill south into the Southwest pumping station. Discharges directed to this portion of the storage area could be picked up with a vacuum truck. The risk of impact on navigable waters from such a spill is considered minimal.

Drum Storage and Miscellaneous Oil Containers

Oil products such as lubricating oil, grease, used oil, mineral oil, and similar items are often stored in 55-gallon drums for use at various locations within the facility. As such they are included by the regulations in the aggregate aboveground storage capacity (refer to Table 1).

At this facility, ASPA stores 55-gallon drums at the following locations:

- Inside the Mechanic's Shop (Container ID No. 4)
- Inside the Oil Shed on the concrete floor (Container ID No. 5)
- Outside the Oil Shed on a concrete pad (Container ID No. 6)
- On the beds of maintenance trucks (Container ID No. 9)

In total, oil products or byproducts are stored in approximately 90 drums owned and maintained by ASPA.

3.3 Designation of Oil Transfer Locations

Other than minor transfer operations (e.g., from drums or small tanks to equipment), the primary bulk oil transfer activity by ASPA occurs at the following locations:

- South of the McDuffie Import Yard at the 1,000-gallon Gasoline Fuel AST and 3,000-gallon Diesel Fuel AST (Container ID No. 2 and 3, respectively);
- Filling the 250-gallon Motor Oil AST, 250-gallon Hydraulic Oil AST, and 100gallon Motor Oil AST inside the Mechanic's Shop and emptying the 280-gallon Used Oil AST inside the Mechanic's Shop (Container ID No. 4);
- On the west side of the facility, 250 ft. NE of car dumper No. 1 at the 10,000-gallon Diesel Fuel and 8,000 Gasoline Fuel ASTs (Container ID No. 7); and
- Filling the 550-gallon Diesel Fuel AST in the southwest corner of the facility near the coal spoil area (Container ID No. 8).

Loading and dispensing of diesel fuel or gasoline from each of the stationary ASTs occurs outdoors without a traditional loading rack containment system. Fuel is pumped into the tank though the fill port at the top of each tank. Fuel is pumped through a dispenser nozzle from the tank.

Loading of the truck-mounted diesel tank and fuel dispensing occurs without a traditional loading rack containment system. Fuel is pumped into the tank though the fill port at the top of each tank. Fuel is pumped through a dispenser nozzle from the tank.

Used oil is poured directly into the containers from smaller containers. During removal of used oil from tanks or drums, a licensed used oil contractor will park the collection

truck adjacent to the containers and collect the contents using a suction pump and hose in areas without a traditional loading rack containment system. Oil is suctioned out by the used oil contractor through an opening located on the top of the containers.

Loading of hydraulic and motor oil into the respective ASTs occurs without a traditional loading rack containment system. Hydraulic or motor oil is pumped into the tank though the fill port at the top of the tank. Oil is pumped through a nozzle from the tank.

3.4 Containment and Diversionary Structures

Discharges of oil which could occur at the site can be contained, diverted, and/or removed prior to reaching navigable waters or adjoining shorelines. Appropriate containment and/or diversionary structures or equipment are provided which impede such discharges until such time as removal and clean-up can be conducted. Predicted release pathways from each bulk storage container location are provided in Table 1.

All of the stationary ASTs owned and operated by ASPA are either double-walled steel tanks or contained inside a dike. Additionally, an oil discharge from any stationary AST owned or operated by ASPA would drain to a stormwater pump station and ultimately the permitted stormwater retention ponds where oil collection measures could be implemented prior to a release to Mobile Bay.

A release from the truck-mounted 250-gallon diesel tank is most likely to occur in locations where coal-moving equipment are located which is within the permitted stormwater treatment basin boundaries which would also allow for oil collection measures to be implemented prior to a release to Mobile Bay.

Sorbent materials and mobile pumps are available at the facility for collecting discharges of various amounts. Also, see Section 4.4 of this SPCC plan for further discussion of loading/unloading areas.

3.5 Containment Practicability / Spill Contingency Commitment

The installation of structures and equipment to provide containment and prevent discharges from reaching navigable waters has been considered practicable and implemented. Nevertheless, certain portions of the facility where oil is transferred or dispensed may not have complete physical secondary containment. Therefore, the facility maintains a strong contingency plan for expeditious and coordinated response to a spill should such occur (see Section 8 of this SPCC Plan).

4.0 CONFORMANCE WITH SPECIFIC SPILL PREVENTION AND CONTROL GUIDELINES

4.1 Facility Drainage Control

Conformance with applicable provisions is demonstrated. Refer to Sections 4.1, 4.2, 4.3, and 4.4 of this SPCC Plan.

McDuffie Coal Terminal contains a system for diverting surface water runoff that consists of catch basins, underground piping, open ditches, pump stations, holding basins, sedimentation basins, and other treatment basins. Drainage from all other fuel storage areas and loading and unloading areas is diverted to permitted treatment basins. The treatment basins are capable of providing temporary containment for spills prior to discharge.

ASPA does not own or operate any container areas with diking that is exposed to rainfall at the facility. Section 5.1 describes the drainage procedure from containment dikes should any dikes be added to the facility by ASPA.

4.2 Bulk Storage Containers

Conformance with applicable provisions is demonstrated, including:

- compatibility of tank materials with contents
- secondary containment
- inspection of diked area drainage (not currently required for this facility)
- periodic integrity testing and/or visual inspections
- "fail-safe" engineering features (as applicable)
- visible oil leak corrections

Refer to Sections 3.2 and 3.4 of this SPCC Plan for details regarding bulk storage containers. Refer to Section 5.0 of this SPCC plan for descriptions of inspections and tests.

Provisions of 40 CFR 112.8(c)(4, 5, 7, 9, and 11) pertaining to control of leakage from internal steam heating coils, corrosion protection of buried metallic storage tanks, partially buried metallic storage tanks, treatment system effluent observation, and positioning of mobile/portable tanks are not applicable.

4.3 Facility Transfer Operations

Refer to Section 3.3 of this SPCC Plan for discussion of loading and unloading operations. Except for the containers noted in Section 3.3, oil transfer is minimal, and provisions of 40 CFR 112.8(d) are not applicable.

The fill ports for the containers listed in Section 3.3 are located on top of the tanks and are capped. All valves, piping, and appurtenances are above ground, highly visible, easily inspected, and compatible with the contents of the tank.

4.4 Facility Tank Car and Tank Truck Loading/Unloading Rack

- Note: This facility does not have a traditional "loading rack" or "unloading rack" (a shelter and associated equipment designed to transfer product to or from storage tanks to or from tank cars or tank trucks). Guidance from USEPA indicates that provisions of 40 CFR 112.7(h) are applicable strictly to loading/unloading "racks", and that other loading/unloading areas are only subject to the general containment requirements of 40 CFR 112.7(c). The facility loading/unloading areas are considered to demonstrate conformance with applicable regulatory provisions, as discussed further below.
- (1)Containment system for truck loading/unloading areas: The loading/unloading areas for the bulk oil storage tanks do not have physical secondary containment such as berms, curbing, drainage to sumps, or similar features. EPA regulations at 40 CFR 112.8(h) (1) for loading/unloading racks require a containment system designed to hold the maximum capacity of any single compartment of a tank truck. Since the facility does not have a "loading/unloading rack", the requirement is not strictly applicable. A latitude of engineering judgment is allowed when assessing equivalent conformance of loading/unloading areas (not including "racks") with the more general containment provisions of 40 CFR 112.7(c). Overall factors relating to the risk and significance of a potential spill during loading/unloading should be considered. Such factors include the proximity of surface waters, frequency of loading/unloading operations, and use of standard operating procedures (SOPs) to prevent potential tank overfills or to respond expeditiously and appropriately should a spill occur. Based on the tanks' locations away from surface waters and/or within controlled storm water management areas, and the infrequency of loading/unloading operations, the risk of a significant spill event affecting waters on the United States or adjoining shorelines is considered to be minor, and equivalent conformance is considered to be demonstrated as long as the facility maintains continued diligence and adherence to standard operating procedures. These procedures should include but are not necessarily be limited to:
 - tank gauging/volume calculation prior to loading/unloading to assure that overfill (of bulk storage tank) cannot occur
 - loading/unloading operation must be continually attended by truck driver and by designated facility personnel
 - use of only trained personnel to attend loading/unloading operation
 - contingency plan for immediate shut-down of loading/unloading operation if equipment failure occurs (such as hose rupture)
 - readily-available spill response equipment at the site
- (2) Interlocked warning light or physical barrier system: Not considered applicable to this facility since there is no "loading/unloading rack". Equivalent conformance with applicable provisions of the regulations is considered demonstrated by

continued diligence and adherence to standard operating procedures.

(3) Examination of lowermost drains/outlets of vehicle prior to filling or departure: Not considered applicable to this facility since there is no "loading/unloading rack". Equivalent conformance with applicable provisions of the regulations is considered demonstrated by continued diligence and adherence to standard operating procedures.

4.5 Oil-Filled Equipment

Several compressors are located throughout the facility. General secondary containment is provided with available sorbents. No qualified oil-filled operational equipment are identified at the facility.

McDuffie has developed and implemented an inspection program for oil-filled equipment. Compressors are inspected on a regular basis.

5.0 INSPECTIONS, TESTS, AND RECORDS

5.1 Tests and Inspections

The following testing and inspections are conducted as described in written procedures and reported on a standard form (see Appendix B).

A. Bulk Oil Storage Containers

All tanks and associated diked and floor drain areas are visually inspected at least monthly. This includes visual inspection of tanks and support structure for evidence of physical damage, corrosion, drip marks, discoloration, cracks, deterioration, etc. Diked and floor drain areas are inspected for evidence of debris accumulation, oil spills or leaks, foundation settlement, gaps between tank and foundation, cracks in the concrete slab or walls, damage caused by vegetation roots, etc. The original inspection report form (provided in Appendix B) is filed at the ASPA Environmental Office.

USEPA regulations at 40 CFR 112.8(c)(6) require that each aboveground container be tested for integrity on a regular schedule, and that visual inspections must be combined with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. However, USEPA guidance also provides that visual inspection alone may suffice, subject to good engineering practice, for certain smaller shop-built containers. Clarifications of the mechanical integrity testing guidance for such containers have been issued from USEPA. For welldesigned shop-built containers with a shell capacity of 30,000 gallons or under, USEPA states that combining appropriate visual inspection with the measures described below would generally provide environmental protection equivalent to that provided by visual inspection plus another form of testing. Specifically, USEPA generally believes that visual inspection plus elevation of a shop-built container in a manner that decreases corrosion potential (as compared to a container in contact with soil) and makes all sides of the container, including the bottom, visible during inspection (e.g., where the containers are mounted on structural supports, saddles, or some forms of grillage) would be considered "equivalent".

• The 10,000-, 8,000, 3,000 and 1,000-gallon Diesel Fuel and Gasoline ASTs (Container ID Nos. 2, 3, and 7) and the 280-gallon Used Oil AST (Container ID No. 4) are "double-walled" tanks. They are designed in accordance with UL 142 for steel aboveground atmospheric tanks for flammable and combustible liquids. These tanks are manufactured so that the interstitial space between the inner and outer tank walls can be monitored for the presence of liquid by unscrewing a cap mounted on the leak detection monitoring port on the side of the tanks and a dry rod or similar device inserted to the base of the port. This cap should be removed and the port inspected for the presence of liquid on a monthly basis. The

results should be recorded as part of a visual inspection. The inspection is considered to be an adequate test of the tank's integrity and conforms to good engineering practice and applicable industry standards. Should oil be present in the interstitial space, the cause should be investigated and appropriate repairs implemented.

Based on EPA guidance, with consideration of the specific features of these three diesel fuel tanks, the program of periodic visual inspections is considered to demonstrate equivalent conformance with applicable regulations.

- Single-walled tanks resting on metal saddles are the following:
 - 250-gallon Motor Oil, 250-gallon Hydraulic Oil, and 100-gallon Motor Oil ASTs (Container ID Nos. 4) inside the Mechanic's Shop.

These tanks are elevated above the ground or above either metal or concrete flooring, are located where they are not likely to be spilled, and are situated where they can be easily inspected. Based on the USEPA guidance discussed previously, with consideration of the specific features of the tank, a program of periodic visual inspections is considered adequate to demonstrate equivalent conformance with applicable regulations.

- Approximately 90 55-gallon drums owned and operated by ASPA (Container ID Nos. 2, 9, and 10) are located outside or inside various buildings at the facility. Drums are stored on wooden pallets for inspection. USEPA guidance provides that visual inspection alone may suffice, subject to good engineering practice, for certain smaller shop-built containers in which:
 - internal corrosion poses minimal risk of failure,
 - which are inspected at least monthly, and
 - for which all sides are visible (i.e., the container has no contact with the ground).

Based on this USEPA guidance, a program of periodic visual inspections will be performed to demonstrate equivalent conformance with applicable regulations to facilitate monthly inspections. All drums should be secured from tipping and those stored outside should be capped to prevent rainfall from entering. Spill control materials are available in each storage area should they be needed.

5.2 Recordkeeping

The original inspection records required in this section shall be signed and dated by the inspector and maintained in permanent files at the ASPA Environmental & Program

Management office. The SPCC regulations require that <u>all records shall be maintained for a</u> <u>minimum period of three years</u>.

6.0 SECURITY

All storage tanks are contained within the fenced area of the facility. Entrance gates to the facility are guarded 24 hours a day, 7 days a week.

Starter controls on the pumps serving the ASTs with dispensers are kept in the "OFF" position and are accessible only to authorized personnel.

Lighting is strategically placed about the facility so that spills or leaks at bulk storage tanks, valves, pumps, etc. can easily be observed during nighttime hours.

7.0 PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCEDURES

The designated person who is responsible for oil spill prevention is Scott Wallace, McDuffie Operations Manager.

Oil-handling personnel shall be instructed in the operation and maintenance of equipment to prevent discharges of oil, discharge procedure protocols, applicable pollution control laws and regulations, general facility operations, and the contents of the SPCC plan.

Formal safety meetings are held regularly to discuss operating procedures, spill prevention, and spill reporting (internal reporting within the facility). Such briefings shall be conducted frequently enough to assure adequate understanding of the SPCC Plan (at least annually), and shall highlight and describe known spill event or failures, malfunctioning components, and recently developed precautionary measures.

Records of personnel training related to this SPCC Plan shall be maintained a minimum of three years.

8.0 SPILL CONTINGENCY PROCEDURES

8.1 General

The purpose of this section is to provide guidance for response actions to be implemented to contain a spill or discharge of oil of any magnitude. The goal of the response actions is to prevent the oil from reaching navigable waters, or any drains, sewers, ditches, etc. that lead to navigable waters. The procedures outlined in this SPCC plan are designed to contain a spill or discharge of oil anywhere in the facility.

8.2 Organizational Responsibilities

Note: See Section 8.3, Emergency Notification Call Lists, for names and contact information.

Employee and Supervisor

Each employee has the responsibility of reporting a spill, seepage, or potential pollution incident (of any size and at any location) to their immediate supervisor. The supervisor shall report the incident to the facility's On-scene Coordinator (OSC) or Alternate OSC.

The employee shall take immediate action to stop source of the spill (i.e. by closing the necessary valves, etc.), as long as no personal danger is involved and if the action (based on training and knowledge of the area) directly relates to his or her job.

If the incident poses an immediate threat to safety or property beyond the capabilities of internal response, the supervisor is responsible for requesting assistance from local emergency response agencies (i.e., Fire Department).

On-scene Coordinator (OSC) and Alternate OSC

The OSC is the ranking individual at the scene of a release incident who coordinates and directs response efforts to control and cleanup the spill. The responsibility for initial emergency response management at the facility lies with the McDuffie Operations Manager, who assumes the role of OSC. In the absence of the McDuffie Operations Manager, the McDuffie Operations Supervisor will act as Alternate OSC. If the McDuffie Operations Manager and McDuffie Operations Supervisor are absent, the facility Person-In-Charge assumes command until relieved by higher management.

The OSC (or alternate) must make an initial determination of the nature, severity, and level of response necessary for the incident. The OSC shall notify Alabama State Port Authority Environmental personnel at the ASPA office, 1400 Alabama State Docks Road, Suite 200, for guidance. The OSC is responsible to issue all required regulatory agency notifications (see Section 8.6). Specifically, the OSC must determine if the spill constitutes a **Reportable Discharge** and provide notification to the **National Response Center** and/or other agencies as required.

Response Team (RT)

The RT performs response actions as directed by the OSC. The RT is composed of designated facility emergency response personnel, who are trained and approved to participate in response actions.

Oil Spill Response Contractors

Oil Spill Response Contractors are outside organizations with specialized capabilities in control and cleanup of oil release incidents. The responsibility for mobilizing an Oil Response Contractor lies with OSC. United States Environmental Services has provided a Letter of Intent (Appendix C) to provide oil spill response at ASPA facilities or assist in obtaining response services from another vendor. The OSC may utilize another Oil Spill Response Contractor at his/her discretion.

8.3 EMERGENCY NOTIFICATION CALL LISTS

Emergency	Telephone Call List
Names	Emergency Phone Numbers
Local Police, Fire, and Emergency Services	911
ASPA Police Department	251-441-7777
National Response Center (NRC) (Mandatory Notification)	800-424-8802
Alabama Department of Environmental Management (ADEM), Mobile, AL Field Office	251-450-3400 800-843-0699 (24 Hours, Alabama EMA)
U.S. Environmental Protection Agency Region IV, Atlanta, Georgia	404-562-8700 (24-hours)
Mobile County Emergency Management	251-460-8000
United States Coast Guard Marine Environmental Protection Division	251-441-5286
Local Health Provider: Mobile Infirmary Medical Center 5 Mobile Infirmary Circle, Mobile, AL	251-435-2400

ASPA Emergency Response Management Team							
Contact	Position	Work Phone	Home Phone	Cell Phone			
Scott Wallace	McDuffie Operations Manager On-Scene Coordinator (OSC)	251-441-7675	251-633-4324	251-422-9069			
Scott McAfee	McDuffie Operations Supervisor/ Alternate OSC	251-441-7310	251-626-6136	251-422-3550			
Bob Harris	V.P., Environmental & Program Management	251-441-7082	251-621-5611	251-554-6508			
Gretchen Barrera	Environmental Section Manager	251-441-7086	832-656-9424	251-622-4180			

Oil Spill Response Contractors				
Names	Emergency Phone Numbers			
United States Environmental Services	(251) 662-3400 24-Hour No. (251) 662-3500			
Oil Recovery Company of Alabama	(251) 690-9010			
Aaron Oil	(251) 479-1616 or 675-7777			

8.4 Immediate Response Action Procedures

In the event of a spill, the first priority is to provide medical first aid and health/safety assistance to affected personnel. The individual or individuals first observing a spill should then take immediate actions to control the spill, if such actions are practical, taking into account personal safety.

Personnel immediately on the scene must act appropriately but not recklessly. Personnel should not enter into a situation involving imminent risk to human health or life. In all instances, common sense, good judgment, training, and experience should prevail.

After immediate actions have been taken to ensure personal safety, control the spill source, and contain the spill (if possible). Additional response actions, including cleanup and disposal options, will depend on specific factors associated with the incident, such as quantity and type of materials, whether it is contained on-site, whether it poses imminent risks to human health or the environment, and so forth.

The following are general steps to follow in the event of a spill incident.

- 1. Provide medical first aid and health/safety assistance to affected individuals and implement safety and spill control measures for the area (if practical, without further endangerment of additional personnel). Eliminate the source of the spill or release (shut-off controls, valves, etc.), if it can be done safely.
- 2. The person discovering the spill should notify his/her supervisor.
- **3.** Identify the spilled material type and quantity, and assess severity of the emergency. Depending on the situation, notify local fire and emergency agencies.
- 4. Isolate the area from other activity, if necessary. Identify other potential

hazards in the spill area.

- 5. Notify the facility OSC or Alternate OSC. The OSC or alternate is responsible for regulatory agency notifications (if required), notification to ASPA environmental managers, and to mobilize an Oil Spill Response Contractor if needed.
- 6. If the spill is minor and response is within the facility's capabilities, assemble Response Team (RT) and direct RT clean-up. Assure that appropriate Personal Protective Equipment (PPE) is worn by the RT.
- 7. The RT will contain the spill (for example using temporary berms, or diversion ditches) to as small an area as possible, and prevent it from leaving facility boundaries. Select appropriate cleanup procedures and materials and arrange for appropriate disposal. Disposal methods must be in accordance with all applicable state and federal regulations. Disposal should be coordinated with the ASPA Environmental & Program Management to assure disposal is in accordance with internal policy and with applicable regulations.
- **8.** Prepare and submit after-incident reports.

In the case of all spills, handling of contaminated materials and/or attempting to stop releases, restrict all sources of ignition and wear appropriate PPE. When a spill does occur, the Material Safety Data Sheet (MSDS) should be consulted to determine appropriate personnel protection requirements.

8.5 Facility Response Equipment

The following table lists equipment available at the facility for responding to small spills.

Response Equipment

- Spill Kits rolls and pads of absorbent material, absorbent boom, Oil-Dri or similar, disposable hazmat bags
- Personal Protective Equipment hard hats, shields, chemical resistant suits, boots, gloves, and eye protection
- Fire Extinguishers

Additional heavy earth moving equipment such as a front-end loaders, bulldozers, and backhoes, may be available (depending on their current deployment at the time of the spill) for spill containment, disposal, and cleanup.

8.6 **Regulatory Notification and Reporting Procedures**

8.6.1 Oil Spill Notifications

There is no quantitative definition that triggers reporting requirements for an oil spill. A **Reportable Spill** for Federal regulatory requirements is defined in 40 CFR 110 as "a discharge of such quantities of oil into or upon the navigable waters of the United States or adjoining shorelines determined to be harmful to the public welfare of the United States . . . to include discharges which violate applicable water quality standards or cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines."

Therefore, in order to determine whether an oil spill requires Federal notification, it must be determined whether the oil has entered (or poses a threat to enter) navigable waters of the United States. The definition of "navigable waters of the United States" (which may be found in 40 CFR 110) is very broad. In general, it includes nearly all surface waters, tributaries (including intermittent streams), and adjacent wetlands. As a matter of practice, Federal notification is likely required for any oil spill that has migrated off-site by surface drainage (or threatens to migrate off-site) and/or has entered a storm drain that flows offsite.

An oil spill that requires Federal notification must be reported to the National Response Center (NRC). This notification must be done as soon as possible after the spill is discovered.

An example notification form containing information required for NRC notification is contained in Appendix D. It is not necessary to compile all information before calling NRC.

In addition, the State of Alabama includes groundwater in the definition of the "waters of the State," and discharge of oil into groundwater would constitute a reportable spill to the State. Therefore, an oil spill incident that enters soil and threatens to reach groundwater may require state notification (but not necessarily Federal notification).

Oil spill incidents requiring state notification must be reported to the Alabama Department of Environmental Management (ADEM).

8.6.2 Post-spill reporting

Whenever more than 1,000 gallons of oil are discharged into navigable waters in a single incident, or more than 42 gallons of oil are discharged in each of two incidents occurring within any 12-month period, a written report must be submitted to the USEPA Regional Administrator:

US Environmental Protection Agency Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-3104 (404) 562-8651

This report must also be sent to the state agency responsible for oil pollution control activities:

Alabama Department of Environmental Management Field Operations Division P.O. Box 301463 Montgomery, AL 36130-1463 (334) 394-4382

These requirements are defined in 40 CFR 112.4. The report must contain the following:

- Name of facility
- Name(s) of the owner or operator of the facility
- Location of the facility
- Maximum storage or handling capacity of the facility and normal daily throughput
- An adequate description of the facility, including maps, flow diagrams, and topographical maps (provide a complete copy of the SPCC plan)
- The cause(s) of such discharges, including a failure analysis of system or subsystem in which the failure occurred
- Corrective actions and/or countermeasures taken, including a description of equipment repairs and/or replacements
- Additional preventive measure(s) taken or contemplated to minimize the possibility of recurrence
- Such other information as the Regional Administrator may reasonably require as pertinent to the plan or discharge

	Table 1 - Aboveground Oil Storage Container Inventory							
ID No.	Owner	Area or Location	Container Contents or Equipment Description	Container Volume (gallons)	Secondary Containment?	Dike Net Volume (gallons)		
1	ASPA	1901 Entrance Gate	Caterpillar Diesel Generator	1,650	Yes	1,831		
2	ASPA	Southeast of McDuffie Import Yard	Gasoline AST	1,000	Yes, Double Walled Tank	N/A		
3	ASPA	Southeast of McDuffie Import Yard	Diesel Fuel AST	3,000	Yes, Double Walled Tank	N/A		
4	ASPA	Mechanics Shop	Used Oil AST Motor Oil AST Hydraulic Oil AST Motor Oil AST Drums of New Motor Oil, Hydraulic Oil, and Grease	280 250 250 100 11*55 Gallon Drums (1,485 Total)	Yes, Double Walled Tank Yes, Drains to O/W Separator Yes, Drains to O/W Separator Yes, Drains to O/W Separator Yes, Drains to O/W Separator	N/A N/A N/A N/A N/A	Four dra	
5	ASPA	Oil Shed (Bldg. 112146C), Inside Bldg.	Unused Motor Oils, Hydraulic Oils, Lube Oils, and Grease Drums. Used Oil Drums; All 55 Gallon Drums	Max 55*55 Gallon Drums (3,025 Gallons Total)	Yes, Drains to O/W Separator	N/A	Spills fr	
6	ASPA	Oil Shed (Bldg. 112146C), Outside Bldg.	11 Empty Hydraulic Oil Drums under Lean-To Cover, Uncovered are 1 drum for Grease-Laden Gloves and 6 New Grease Drums. All 55 Gallon Drums.	Max 18*55 Gallon Drums (990 Gallons Total)	Yes, Drains to O/W Separator	N/A	Spills fro	
7	ASPA	West side of McDuffie Coal Terminal, 250 ft. NE of Car Dumper No. 1.	Diesel Fuel AST Gasoline AST	10,000 8,000 (18,000 Gallon Total)	Yes, Double Walled Tank Yes, Double Walled Tank	N/A N/A	Spills fro	
8	ASPA	Southwest corner of the facility near the coal spoil area	Diesel Fuel AST	550	Yes, Double Walled Tank	N/A		
9	ASPA	Entire Facility; When not in use, trucks are parked at 1901 in fenced area	4 Trucks Containing 1-55 Gallon Grease Drum	4*55 Gallon Drums in Beds of Grease Trucks	Exempt as mobile refueler	N/A	Spills of	
			Total ASPA Container Volume (Gallons):	29,920				
A	G.A. West	McDuffie Import Yard, North and East of Main Facility	Diesel Fuel AST	1,000	Yes, Double Walled Tank	N/A		
в	G.A. West	McDuffie Import Yard, North and East of Main Facility	Truck-mounted Diesel Fuel Tank	500	Exempt as mobile refueler	N/A		
L						1		

Comments and Prediction of Oil Discharge
Spill would flow south into McDuffie Import Yard
East Towards Depression in Yard
East Towards Depression in Yard
drains in concrete floor flows to O/W separator, located on the southwest cornor of the building.
from these drums would flow into circular drain in concrete floor inside bldg. then into O/W separator.
from these drums would flow south into drainage ditch, then into O/W separator.
from these tanks would flow east into ditch then south into south pumping station holding pond.
Spills would flow south into the south pumping station holding pond.
of up to 55 gallons. Because units are mobile prediction of direction of flow is not possible.
East towards depression in yard

East towards depression in yard
с	G.A. West	McDuffie Import Yard, North and East of Main Facility	Portable Gasoline Tank	55	Exempt as mobile refueler	N/A	
D	G.A. West	McDuffie Import Yard, North and East of Main Facility	3 Trucks Containing 84 Gallon Diesel Refueling Cells	84 84 84	Exempt as mobile refueler	N/A	Spills of
E	Coal Freight Forwarding	Entire Facility; When not in use, trucks are parked at 1901 in fenced area	(2) 250 Gallon trailer mounted Diesel Fuel Tanks	250 250	Yes, Double Walled Tank	N/A	Spills of u
F	Coal Freight Forwarding	West side of McDuffie Coal Export Yard	Diesel Fuel AST	10,000	Yes, Metal Dike	11,534	
G	Coal Freight Forwarding	West side of McDuffie Coal Export Yard	1*55 Gallon Fuel Improver Drums	55	Yes, Containment Pallet	No	
н	Coal Freight Forwarding	Southwest corner of McDuffie Coal Terminal property, outside of Coal Freight Forwarding Shop	Motor Oil Tote	250	No, Single Walled	N/A	Spills fro
I	Coal Freight Forwarding	Southwest corner of McDuffie Coal Terminal property, outside of Coal Freight Forwarding Shop	Used Oil AST	2,000	Yes, Metal Dike	5,568	Spills
J	Coal Freight Forwarding	Southwest corner of McDuffie Coal Terminal property, outside of Coal Freight Forwarding Shop	Used Oil AST	100	Yes, Metal Dike	478	Spills v
к	Coal Freight Forwarding	Southwest corner of McDuffie Coal Terminal property, inside of Coal Freight Forwarding Shop	Hydraulic Tank	550	Yes, Double Walled Tank	N/A	Spills v
L	Coal Freight Forwarding	Southwest corner of McDuffie Coal Terminal property, inside and outside of Coal Freight Forwarding Shop	Lube Oil Drums	Max 14*55 Gallon Drums (770 Gallons Total)	No	N/A	Spills v

of up to 84 gallons. Because units are mobile, prediction of direction of flow is not possible.

of up to 250 Gallons. Because units are mobile, prediction of direction of flow is not possible.

Spills would flow south into south pumping station holding pond.

Spills of up to 55 gallons. Contained in pallet.

from these tanks would flow east into ditch then south into south pumping station holding pond.

Ils would flow west into ditch then south into south pumping station holding pond.

Is would flow west into ditch then south into south pumping station holding pond.

Is would flow west into ditch then south into south pumping station holding pond.

Is would flow west into ditch then south into south pumping station holding pond.





Alabama State Port Authority McDuffie Island Coal Terminal SPCC Plan Figure 1 – Site Vicinity Map







Alabama State Port Authority McDuffie Island Coal Terminal SPCC Plan Figure 2 - Aerial Map





APPENDIX A

CERTIFICATION OF THE APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

FACILITY NAME: ALABAMA STATE PORT AUTHORITY - MCDUFFIE COAL TERMINAL

Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes No 🗵

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?

Yes No 🗵

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes No 🗵

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

Yes No 🗵

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?

Yes No 🗵

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate and complete.

Signature:

Name (Please type or print): <u>Robert C. Harris, Jr., P.E.</u>

Title: VP, Environmental & Program Management, Alabama State Port Authority

Date: 3/29/17

Notes:

- Explanations of terms can be found in Appendix C to 40 CFR 112. If a comparable formula to the ones contained in Attachment C-III is used to establish the appropriate distance to fish and wildlife and sensitive environments or public drinking water intakes, documentation of the reliability and analytical soundness of the formula must be attached to this form.
- For further description of fish and wildlife and sensitive environments, see Appendix I, II and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plan: Fish and Wildlife and Sensitive Environments" (see Appendix E to 40 CFR 112, section 10, for availability) and the applicable Area Contingency Plan.

APPENDIX B

INSPECTION PROCEDURES AND REPORT FORMS

PROCEDURE FOR BULK OIL STORAGE CONTAINER INSPECTIONS

1. Visual Inspection Criteria:

Item	Things to Look For During the Inspection
Diked areas around containers	Debris inside the diked area, oil spills or leaks, cracks in the dike walls or base, physical damage to outside of walls from vehicles, foundation settlement. Drain valve from dike should be free of debris and sediment, and locked in closed position.
Container Condition (incl. Support Structure if applicable)	Physical damage, corrosion, leaks, spills, cracks. Fill port should be closed and container labeled.
Valves, piping, connections, etc.	Condition of valves, piping, connections, hoses, etc. Is there evidence of deterioration or damage? Is there evidence of spills or leakage?

- 2. Frequency: The frequency of inspections shall be monthly.
- 3. Records: Inspections are recorded on standard forms, see attached.

BULK OIL STORAGE CONTAINER INSPECTION REPORT

Inspection Report for:

Year

Month

Indicate if satisfactory by checking table with response of Yes, No, or NA (not applicable). See instructions in SPCC Plan Appendix C.

ID No.	Area or Location	Container Contents or Equipment Description	Container Volume (gallons)	Con	ontaine dition (Suppor tructure isfacto	incl. t e)	ard	ked Ar ound ta isfacto	ink	Conn	ves, Pip ections isfacto	, etc.
				Yes	No	N/A	Yes	No	N/A	Yes	No	N/A
1	1901 Entrance Gate	Caterpillar Diesel Generator	1,650						\times			
2	Southeast of McDuffie Import Yard	Gasoline AST	1,000									
3	Southeast of McDuffie Import Yard	Diesel Fuel AST	3,000									
4	Mechanics Shop	Used Oil AST Motor Oil AST Hydraulic Oil AST Motor Oil AST Drums of New Motor Oil, Hydraulic Oil, and Grease	280 250 250 100 11*55 Gallon Drums (1,205 Total)									
5	Oil Shed, Inside Bldg.	Unused Motor Oils, Hydraulic Oils, Lube Oils, and Grease Drums. Used Oil Drums; All 55 Gallon Drums	Max 55*55 Gallon Drums (3,025 Gallons Total)									
6	Oil Shed, Outside Bldg.	Empty Hydraulic Oil Drums under Lean-To Cover, Uncovered are 1 drum for Grease-Laden Gloves and New Grease Drums. All 55 Gallon Drums.	Max 18*55 Gallon Drums (990 Gallons Total)									

Alabama State Port Authority McDuffie Island Coal Terminal

ID No.	Area or Location	Container Contents or Equipment Description	Container Volume (gallons)	Container Condition (incl. Support Structure) satisfactory?		Condition Suppo Structu		Condition (incl. Support Structure)		Condition (incl. Support Structure)		ncl. Diked Area around tank satisfactory?		Valves, Piping, Connections, et Satisfactory?		, etc.
				Yes	No	N/A	Yes	No	N/A	Yes	No	N/A				
7	West side of McDuffie Coal Terminal, 250 ft. NE of Car Dumper No. 1.	Diesel Fuel AST Gasoline AST	10,000 8,000 (18,000 Gallon Total)													
8	Southwest corner of the facility near the coal spoil area	Diesel Fuel AST	550													
9	Entire Facility; When not in use, trucks are parked at 1901 in fenced area	4 Trucks Containing 1-55 Gallon Grease Drum	4*55 Gallon Drums in Beds of Grease Trucks													

BULK OIL STORAGE CONTAINER INSPECTION REPORT

Comments (describe deficiencies noted, action items that need to be taken, etc. Reference Container ID number). All "No" responses will require an answer.

_		
_		
nspection Performed by:		
Print Name	Signature	Date
Distribution: Submit or retention.	iginal completed form to Gretcher	n Barrera for permanent file

APPENDIX C

NOTIFICATION OF INTENT FROM UNITED STATES ENVIRONMENTAL SERVICES



February 21st, 2017

Alabama State Port Authority P.O. Box 1588 Mobile, AL 36633 Attn: Ms. Gretchen Barrera

Re: Letter of Intent

United States Environmental Services, L.L.C. (USES), appreciates the opportunity to be your spill response contactor. USES is a Coast Guard-classified Oil Spill Response Organization (OSRO), and we comply with National Preparedness for Response Exercise guidelines (PREP).

This letter serves as an agreement between USES an oil and hazardous materials response contactor, and the Alabama State Port Authority, that, in the event of discharge, oil or hazardous material, land or water from any of Alabama State Port Authority facilities' located in the USES response areas, USES will provide services in accordance with the requirements of the Oil Pollution Act 1990. In the event that USES's resources are already committed to another incident, USES will assist you in obtaining response services from another contractor.

USES will provide assistance in all matters concerning oil spill and hazardous materials response, which includes tabletop drills, deployment exercises and meetings to develop strategies to help in planning. USES's personnel are all 40-hour HAZWOPER, OSHA trained in oil and hazardous materials response. USES considers Health and Safety our number one priority.

If you should have any questions or require additional information, please give me a call at our 24-hour emergency call number (251) 662-3500.

Sincerely

Justin Plant Division Manager

CORPORATE OFFICES • 15109 Heathrow Forest Drive, Suite 150, Houston, TX 77032 • (281) 606-4960 • Fax (281) 606-4961 WORLDWIDE HEADQUARTERS • 365 Canal Street, Suite 2520, New Orleans, LA 70131 • (504) 279-9930 • Fax (504) 566-8309 2809 E. Judge Perez Drive, P.O. Box 949, Meraux, LA 70075 • (504) 279-9934 • Fax (504) 279-9926 6338 Highway 73, Geismar, LA 70734 • (225) 673-4200 • Fax (225) 677-9549 42156 Highway 23, P.O. Box 830, Venice, LA 70091 • (504) 534-2744 • Fax (504) 534-7058 1075 Mendell Davis Drive, Jackson, MS 39212 • (601) 372-3232 • Fax (601) 372-3356 13032 Highway 67 North, Biloxi, MS 39532 • (228) 396-3866 • Fax (228) 396-3836 1855 Veterans Drive, Southaven, MS 38671 • (662) 280-3232 • Fax (662) 280-3011 3750 Halls Mill Road, Mobile, AL 36693 • (251) 662-3500 • Fax (251) 662-3400 228 Regency Park, Alabaster, AL 35007 • (205) 663-8737 • Fax (205) 663-4404 301 Old Stone Bridge, Bldg. 3, Suite 301, Goodlettsville, TN 37032 • (615) 855-0010 • Fax (615) 855-0077 950 Seaco Avenue, Deer Park, TX 77536 • (281) 867-4100 • Fax (281) 867-4101 261 Newman Drive, Sherwood, AR 72117 • (501) 753-0522 • Fax (501) 753-1022

24-Hour Emergency Response

(888) 279-9930

All Service Locations

APPENDIX D

NOTIFICATION FORM FOR REPORTABLE SPILLS

NOTIFICATION FORM FOR REPORTABLE SPILL TO THE NATIONAL RESPONSE CENTER (NRC)*

		INVOLVE	ED PARTIES	
	(A) Reporting Party		(B) Suspected Responsible Party	
	Names:		Names:	
	Phones: ()		Phones: ()	
	Company:		Company:	
	Position: Address		Organization Type:Private citizenPrivate enterprisePublic utilityLocal governmentState governmentFederal government	
	City:		City:	
	State		State:	
	Zip		Zip:	
Ca	ere Materials Released (Y/N)? Iling for Responsible Party (Y/N)?		DESCRIPTION	
			her Conditions:	
Da	te: <u>///</u>	Time:		
Са	use:			
Inc Di:	cident Address/Location: stance from City:		Nearest City:	
Di	cident Address/Location: stance from City: prage Tank Container Type - Abovegro		ground (Y/N) Unknown	
Di: Sto Ta	stance from City: orage Tank Container Type - Abovegro nk Capacity:	und (Y/N) Underg	ground (Y/N) Unknown	
Di: Sto Ta	stance from City: orage Tank Container Type - Abovegro nk Capacity:	und (Y/N) Underg Facility Capacity: Longitude Degrees:	ground (Y/N) Unknown Mile Post or River Mile:	
Di: Sto Ta La Re	stance from City: orage Tank Container Type - Abovegro nk Capacity:	und (Y/N) Underg Facility Capacity: Longitude Degrees: <u>MATI</u> Released Materia	ground (Y/N) Unknown	
Di: Sto Ta La Re	stance from City: orage Tank Container Type - Abovegro nk Capacity: titude Degrees: leased Quantity:	und (Y/N) Underg Facility Capacity: Longitude Degrees: Released Materia Unit of Measure:	ground (Y/N) Unknown Mile Post or River Mile: <u>'ERIALS</u> al:	
Di Sta Ta La Re Qu	stance from City: orage Tank Container Type - Abovegro nk Capacity: titude Degrees: leased Quantity:	und (Y/N) Underg Facility Capacity: Longitude Degrees: Released Materia Unit of Measure: <u>REMEDI/</u>	ground (Y/N) Unknown Mile Post or River Mile: <u>'ERIALS</u> al:	
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Di: Sta La Re Qu Ac Nu W	stance from City: orage Tank Container Type - Abovegro nk Capacity: titude Degrees: leased Quantity: leased Quanttity: leased Q	und (Y/N) Underg	ground (Y/N) UnknownMile Post or River Mile:	
Di: Sta La Re Qu Ac Nu W	stance from City: orage Tank Container Type - Abovegro nk Capacity: titude Degrees: leased Quantity: leased Quantity: leased Quantity: tions Taken to Correct or Mitigate Inc tions Taken to Correct or Mitigate Inc	und (Y/N) Underg Facility Capacity: Longitude Degrees: Released Materia Released Materia Unit of Measure: ident: Mumber of Fatalit Number Evacuate Damage in Dollars <u>ADDITIONAL</u> recorded elsewhere in the report <u>CALLER NO</u> STATE	ground (Y/N) UnknownMile Post or River Mile:	