



AL0006
CORRECTIVE ACTION PLAN
ATTF CP-10

August 29, 2025



2277 Douglas Avenue
Brewton, Escambia Co., AL

FAC ID 25265-053-018577
UST 24-12-05

PREPARED FOR

LGWS/CrossAmerica Partners
600 Hamilton St., Suite 500
Allentown, PA 18101

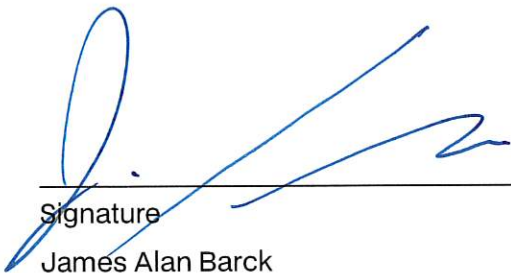
PREPARED BY

Three Notch Group
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CERTIFICATION PAGE

"I hereby certify that, in my professional judgment, the components of this document and associated work satisfy the applicable requirements set forth in Chapter 335-6 of the ADEM Administrative Code, and are consistent with generally accepted professional consulting principles and practices. The information submitted herein, to the best of my knowledge and belief, is true accurate, and complete. I am aware that there are significant penalties for submitting false information."

This document has been prepared based on historical site assessment data and has been prepared to address soil and groundwater contamination at the AL0006 site (Facility Identification Number 25265-053-018577) in Brewton, Escambia County, Alabama. The recommended action should not be construed to apply to any other site.


Signature

James Alan Barck

Registered Professional Engineer in the State of Alabama

Registration No. 32719



9-2-25

Date

PROJECT SUMMARY

The AL0006 facility is a commercial property that currently operates as a gasoline station and convenience store. The site has one 15,000-gallon unleaded gasoline Underground Storage Tank (UST), one 10,000-gallon unleaded gasoline UST, and one 8,000-gallon diesel UST.

On December 13, 2023, Three Notch Group, Inc. (Three Notch) submitted a UST Release Report to the Alabama Department of Environmental Management (ADEM) after a technician observed a product line leaking under a dispenser while conducting routine maintenance. On December 14, 2023, Three Notch submitted a Notice of Intent to Permanently Close Underground Storage Tanks or Piping for the leaking dispenser lines. On December 19, 2023, the leaking fitting was replaced on the dispenser line. As a result of the Release Report, ADEM sent the responsible party, LGWS/CrossAmerica Partners, a Notification of Requirement to conduct Investigative and Corrective Actions. In a second letter dated January 22, 2024, ADEM issued a Notice of Alabama Tank Trust Fund Eligibility. In a third letter dated January 29, 2024, ADEM issued the Pre-Approved Cost Proposal (CP-01) for conducting Preliminary Investigation activities. LGWS/CrossAmerica Partners engaged Three Notch as the ATTF contractor.

From February 2024 through May 2025, Three Notch conducted a Preliminary Investigation, a Secondary Investigation, a Well Installation, an Alabama Risk Based Corrective Action (ARBCA) Tier I/II Evaluation, groundwater monitoring events, Mobile Enhanced Multi-Phase Extraction (MEME) events, and a Corrective Action Evaluation. During these assessment activities, twenty-one Type II monitoring wells, two Type III vertical delineation wells, and five 4-inch recovery wells were installed at the site.

In a review letter dated June 17, 2025, ADEM agreed with the Corrective Action Evaluation recommendations and requested that Corrective Action Plan (CAP) Development be conducted for a Multi-phase Extraction (MPE) system at the site. The following CAP has been developed based on the recommended approach in the Corrective Action Evaluation. The data summary tables are included in Appendix A and site figures, representing current groundwater conditions, are included in Appendix B.

SUMMARY OF PREVIOUSLY CONDUCTED CORRECTIVE ACTIONS

Investigative and Corrective Actions at the AL0006 site have been ongoing since October 2024. From October 2024 through August 2025, ten MEME events have been conducted at the site. Approximately 1,542.01 pounds of hydrocarbons or the equivalent of 250.33 gallons of gasoline have been removed from the site.

REMEDIAL OBJECTIVES AND SITE CHARACTERIZATION

General Remedial Objectives

The general objectives of the corrective action activities for the facility are as follows:

- Ensure that the health and safety of all project personnel is maintained during remediation activities.
- Prevent hydrocarbon contaminant migration to sensitive receptors.
- Remove free product from the site subsurface.
- Reduce adsorbed phase petroleum hydrocarbons from soils within the vadose and saturated zone, to below Site-Specific Target Levels (SSTLs).
- Reduce dissolved petroleum hydrocarbons from groundwater to below SSTLs.
- Accomplish these objectives in a timely and cost-effective manner.

Exposure Assessment

An exposure assessment was conducted by Three Notch during the ARBCA Evaluation completed in January 2025. The following receptor survey information has been drawn from the ARBCA Tier II Evaluation report:

Receptor Type	Actual Receptor	On-Site/ Off-Site	Pathway Status
Commercial Sites	Commercial Worker (10 hours/day)	On-Site	Complete. Soil & Groundwater Vapor Inhalation. Future – Soil & Groundwater Vapor Inhalation.
		Off-Site	Complete. Soil & Groundwater Vapor Inhalation. Future – Soil & Groundwater Vapor Inhalation.
	Construction Worker	On-Site	Complete. Dermal Contact, Soil & Groundwater Vapor Inhalation. Future – Dermal Contact, Soil & Groundwater Vapor Inhalation.
		Off-Site	Complete. Dermal Contact, Soil & Groundwater Vapor Inhalation. Future – Dermal Contact, Soil & Groundwater Vapor Inhalation.

Receptor Type	Actual Receptor	On-Site/ Off-Site	Pathway Status
Residential	Resident (24 hours/day)	On-Site	Not Complete. The site is a commercial property in a commercial area and will likely remain so.
		Off-Site	Complete. Soil & Groundwater Vapor Inhalation. Future – Soil & Groundwater Vapor Inhalation.
Ingestion	Water	On-Site	Not Complete. Water is supplied by municipal sources.
		Off-Site	Complete. A private water well that supplies water to an adjacent mobile park is located 91 feet southeast of the site.

The current land use site conceptual exposure model indicates that complete exposure pathways for vapor inhalation exist for on-site/off-site commercial and construction workers. Additionally, complete exposure pathways exist for off-site residents. No municipal supply wells were located within a one-mile radius of site and no domestic supply wells could be found within 1,000 feet of the site.

Site-Specific Target Levels

To assess the risk to human health and the environment from the dissolved hydrocarbon plume associated with the AL0006 site, an ARBCA Tier I/Tier II Evaluation was performed in January 2025. Based on the ARBCA Tier II Evaluation, SSTLs for site remediation were calculated for the various media (soil and groundwater) at the site. The SSTLs for soil and groundwater are summarized in the following table.

Chemicals of Concern	Soil (mg/Kg)				Groundwater (mg/L)	
	Dermal Contact	On-Site Indoor Inhalation	Off-Site Indoor Inhalation	Groundwater Resource Protection	On-Site Indoor Inhalation	Off-Site Indoor Inhalation
Benzene	40	0.5	0.0763	6.13	13.8	2.1
Toluene	789	94.9	8.83	526	526	129
Ethylbenzene	363	350	32.6	169	169	169
Xylenes	453	141	13.1	175	175	106
MTBE	378	941	87.6	24.5	26,200	2,440
Naphthalene	371	125	11.7	24.5	31	4

A more detailed presentation of these values is provided in the January 2025 ARBCA Evaluation Report. The individual Groundwater Resource Protection (GRP) SSTLs generated for the site monitoring wells are presented on the attached Monitoring Point Data Summary Tables located in Appendix A.

RECENT MONITORING ACTIVITIES, RESULTS, AND COMPARISONS TO SSTLS

Three Notch recommended the installation of a MPE system to aggressively address both soil and groundwater contamination at the site. As part of the CAP, current representative concentrations for the chemicals of concern (COCs) were needed for the evaluation and design of a plan to effectively treat and reduce contaminants. The site has had multiple approved groundwater monitoring events conducted. The following details the activities and results of the most recent groundwater monitoring event conducted on July 7, 2024.

Maps for the most recent groundwater monitoring event, in addition to general site maps, are located in Appendix B. The Quality Assurance/Quality Control Monitoring and Sampling Plan is located in Appendix F. The Site Health and Safety Plan is located in Appendix G.

Groundwater Monitoring Activities

Personnel from Three Notch mobilized to the site on July 7, 2025, to collect groundwater samples for Chemicals of Concern (COC), which include benzene, toluene, ethylbenzene, xylenes (BTEX), methyl tertiary-butyl ether (MTBE), and naphthalene analysis. Upon arriving at the site, the technician removed the well caps from each of the twenty-eight monitoring wells and the water levels in the wells were allowed to stabilize. Potentiometric levels were then measured with an electronic water level indicator and recorded in the site field book. Based on the results from the current groundwater monitoring event, the groundwater flow direction beneath the site is generally to the east. After all measurements were completed, each of the twenty-eight monitoring wells was properly purged in preparation for groundwater sampling activities. All wells were purged a minimum of three well volumes or until the well purged dry. Approximately 254.5 gallons of purge water were removed from the wells. Approximately 27 gallons of free product and PCW from four of the wells (MW-3, MW-4, MW-14, and RW-1) were containerized and transported to a holding tank at the Three Notch office location in Andalusia, AL and later picked up and properly disposed of by Oil Recovery, Inc. The remaining 227.5 gallons of purge water were temporarily stored in a drum and treated using a portable carbon unit prior to being discharged onsite. A sample of the

treated water was collected for BTEX/MTBE/Naphthalene analysis to verify that the carbon did not have breakthrough.

Groundwater samples were collected from twenty-seven of the twenty-eight monitoring wells for BTEX/MTBE/Naphthalene analyses using new, disposable bailers and transferred to 40 mL glass VOA vials preserved with HCl. One of the wells (MW-4) had insufficient amounts of water and was unable to be sampled. The collected samples were placed on ice and transported under chain of custody to Waypoint Analytical where they were analyzed by EPA Method 8260B for the presence of BTEX/MTBE/Naphthalene constituents.

Laboratory Analytical Results

The BTEX/MTBE/Naphthalene analyses for this event indicate that COC concentrations were present at the site at levels above the Groundwater Resource Protection (GRP) Site Specific Target Levels (SSTLs) in thirteen (MW-2, MW-3, MW-6, MW-7, MW-13, MW-14, MW-16, MW-17, VW-1, RW-1, RW-2, RW-3, and RW-4) of the twenty-seven sampled monitoring wells. Additionally, four (MW-2, MW-13, MW-16, and RW-1) of the twenty-seven sampled monitoring wells contained concentrations at levels above the established SSTLs for Indoor Air Inhalation. The concentrations above the approved SSTLs are as follows:

	<u>Chemical of Concern</u>	<u>GRP SSTLs</u>	<u>Indoor Inhalation SSTLs</u>	<u>Concentration</u>
MW-2	Benzene	6.13 mg/L	13.8 mg/L	17.3 mg/L
MW-3	Benzene	0.42 mg/L	13.8 mg/L	12.1 mg/L
MW-6	Benzene	0.187 mg/L	13.8 mg/L	0.776 mg/L
MW-7	Benzene	0.343 mg/L	13.8 mg/L	4.12 mg/L
MW-13	Benzene	0.12 mg/L	2.1 mg/L	7.38 mg/L
	Toluene	24 mg/L	129 mg/L	67.8 mg/L
MW-14	Benzene	0.141 mg/L	2.1 mg/L	1.66 mg/L
	Toluene	28.3 mg/L	129 mg/L	37.5 mg/L
MW-16	Benzene	0.0602 mg/L	2.1 mg/L	3.82 mg/L
	Toluene	12 mg/L	129 mg/L	45.6 mg/L
MW-17	Benzene	0.0475 mg/L	2.1 mg/L	1.06 mg/L
VW-1	Benzene	0.881 mg/L	13.8 mg/L	4.00 mg/L

	<u>Chemical of Concern</u>	<u>GRP SSTLs</u>	<u>Indoor Inhalation SSTLs</u>	<u>Concentration</u>
RW-1	Benzene	0.293 mg/L	13.8 mg/L	15.2 mg/L
	Toluene	58.5 mg/L	526 mg/L	71.9 mg/L
RW-2	Benzene	6.13 mg/L	13.8 mg/L	10.4 mg/L
RW-3	Benzene	0.374 mg/L	13.8 mg/L	13.8 mg/L
RW-4	Benzene	0.144 mg/L	13.8 mg/L	0.210 mg/L

The ADEM UST Release Fact Sheet and UST Site Classification System Checklist are included in Appendix H. A list of personnel performing tasks at the site is included in Appendix I.

REMEDIAL RATIONALE AND APPROACH

Based upon current constituent concentrations and the risk assessment results, there are exceedances in the GRP and Indoor Inhalation for groundwater COC constituents along with increasing free product levels. The target levels for GRP developed at the site were calculated based on a hypothetical point approximately 500 feet downgradient of the property boundary plus the distance from the downgradient edge of the source area to the downgradient edge of the property boundary, totaling 545 feet. In order to accelerate the reduction of dissolved hydrocarbon concentrations, Three Notch recommends that a dedicated MPE system be installed at the site.

MPE involves applying vacuum to remove liquid and vapor phase contaminants from low to moderately permeable, heterogeneous soils. MPE typically provides a more efficient remedial approach as opposed to conventional pump and treat technology. The application of vacuum to a recovery well increases the hydraulic driving force that enables groundwater to flow into a recovery well, while conventional pumping relies mainly on a difference in elevation head.

The vapor phase and absorbed phase hydrocarbon contaminant removal in the soil source area and for dissolved-phase hydrocarbon contaminant removal in the groundwater plume at the AL0006 site can be efficiently addressed with the use of a multi-phase extraction system.

REMEDIATION RECOMMENDATION PLAN

The corrective action approach has four main remedial objectives: removal of free product, if present; removal of vapor phase concentrations; removal of absorbed phase concentrations; and removal of dissolved phase concentrations. In an effort to decrease chemicals of concern (COC) concentrations in both soil and groundwater to levels protective of human health and the environment, a dedicated MPE system has been deemed the appropriate modified remediation approach for the AL0006 site.

An illustration of the estimated extent of the dissolved phase contaminant plume based on the July 7, 2025, monitoring event is shown in the figures located in Appendix B. Based on the clean-up time calculations, the estimated clean-up time under ideal conditions would be approximately 5 - 6 years. Based on Three Notch's professional experience with similar sites, this clean-up time estimate would be a reasonable expectation of the period that the system would remain in operation at the site followed by an additional two years of rebound and natural attenuation monitoring before the remediation goals would be achieved and the site eligible for No Further Action (NFA) status.

SYSTEM DETAIL

The proposed MPE system to be installed at the AL0006 site will utilize a single 40 hp oil-sealed liquid ring vacuum pump (LRVP) to produce the high vacuum and airflow rate necessary to remove petroleum constituents from the subsurface. A comprehensive detail of the system components is provided in the quotes included in Appendix C. The LRVP will be connected to a network of eight recovery wells. All system components, excluding air treatment operations, will be enclosed in an insulated building with removable panels. Above ground system components will be enclosed in a security fence complete with locking gates in an effort to prevent unauthorized personnel from entering the remediation compound. The fence will be placarded with a sign listing Three Notch's emergency contact information.

Recovered fluids will travel from the recovery wells to a primary Air/Water Separator (AWS), utilized to separate vapors and groundwater. Initially, thermal/catalytic oxidation will be necessary until free product is no longer present. Once free product is no longer present, the oxidizer will likely be replaced with granular activated carbon vessels for off-gas treatment prior to discharge to the atmosphere. Groundwater will flow from the AWS through an oil-water separator (OWS) to an air stripper (AS) for treatment. The AS is capable of decreasing

hydrocarbon concentrations in recovered groundwater to below NPDES discharge limits at flows up to 15 gallons per minute (gpm). The treated groundwater will be discharged into a storm sewer system under the terms of the general National Pollutant Discharge Elimination System (NPDES) permit. A copy of the NPDES Permit Application is included in Appendix E.

Figures in Appendix B illustrate the proposed locations of the recovery wells, extraction lines, effluent discharge, and proposed system location. Equipment specifications and process diagrams are provided in Appendix C.

The system will be outfitted with an intrinsically safe alarm sensor such that, should an alarm condition occur, the system will automatically shut down until the alarm can be relieved and the system reset. These sensors are included in an effort to maintain effective operation of the system and reduce the potential for untreated discharges. The alarms will be integrated with a telemetry system to notify Three Notch of a system fault, so that it can be restarted as soon as possible. The telemetry system will allow Three Notch to remotely restart the system, depending on the type of alarm. In addition, remote shut down capabilities will be available. A run time (hour) meter will be installed on the system and the system will be equipped with applicable gauges and meters to allow for measurements as required for monthly and/or quarterly reporting.

OFF-GAS VAPOR TREATMENT

Three off-gas vapor treatment alternatives were reviewed for the site. These alternatives included thermal oxidation, catalytic oxidation, and vapor phase carbon (VPC) absorption. Thermal oxidation is typically utilized for applications having high vapor concentrations and high airflows. Catalytic oxidation is typically utilized for applications having low to moderate vapor concentrations and low to moderate airflows. VPC can be utilized for either situation. Based on the presence of free product, flame ionization detector (FID) readings taken during the MEME events, and ADEM 's air division guidance, catalytic oxidation has been chosen as the initial air pollution control device (APCD) option for the AL0006 site. Once free product is no longer detected, the catalytic oxidizer will be removed and replaced with Granular Activated Carbon (GAC) upon approval of the ADEM Air Division. The APCD may be removed upon approval of the ADEM Air Division once vapor concentrations have decreased to below the established limits and any nuisance conditions have been addressed. A copy of the ADEM air emission control permit application is presented in Appendix D.

SOIL REMEDIATION

Analytical data indicates that soil samples collected during the Preliminary and Secondary Investigations and Well Installation exhibited COC constituent concentrations above the SSTLs. Based on site conditions and analytical data, a number of soil remedial technologies are available to address hydrocarbon contamination in the soil. Based on the hydrogeology of the site and depth of soil contamination, it appears that in-situ soil vapor extraction is the most technically feasible and cost-effective technology to address soil contamination.

Data from the previous MEME events performed at the site were utilized to evaluate expected vacuum radius of influence (ROI). The data indicates a vacuum ROI of approximately 40 feet around each of the proposed recovery and an average airflow total rate of 477 cubic feet per minute (cfm) can be expected utilizing an applied vacuum of 9.0 in/Hg or greater. The proposed well locations are illustrated in the site figures located in Appendix B.

Three additional recovery wells will be screened approximately from 20-40 ft-bls with 0.02-inch slotted well screen. Each of the recovery wells (five existing and three proposed) will be plumbed to the MPE system by way of 2-inch diameter PVC below grade piping. Both vapor and liquid phase hydrocarbons will be removed by applying the vacuum generated by the oil-sealed LRVP directly to the 2" flow lines extending from the recovery wells. The locations of the recovery wells and piping are depicted in Figures in Appendix B.

GROUNDWATER REMEDIATION

Based on a review of the historical groundwater elevation data, one distinct water bearing unit exists beneath the site. The observed depths to groundwater beneath the site average approximately 24.44 ft-bls. The depth to groundwater has generally exhibited only small fluctuations between gauging events throughout the sampling history of the site.

Based on previous monitoring well gauging and sampling events conducted at the site, the direction of the shallow groundwater flow is predominantly to the east. A potentiometric surface map from the July 7, 2025, sampling event is presented in the figures (Appendix B).

To effectively cover the targeted zone, three additional 4" recovery wells will be installed at a depth of 40 ft-bls. The recovery wells will be constructed of 20 feet of 4" Schedule 40 PVC solid riser attached to 20 feet of factory slotted 4" PVC well screen. The previously installed

five recovery wells, along with the three newly installed recovery wells, will be plumbed to the MPE system by way of 2-inch diameter PVC below grade piping. Both vapor and liquid phase hydrocarbons will be removed by applying the vacuum generated by the oil-sealed LRVP directly to the 2" flow lines extending from the recovery wells. The locations of the recovery wells and piping are depicted in Figures in Appendix B.

Recovered fluids will flow from the well manifold to the air-water separator unit (AWS) where vapor-phase will be separated from groundwater. Groundwater will be transferred from the AWS to the oil-water separator (OWS) for the removal of any phase-separated hydrocarbons. A totalizing flow meter will be placed in line to record the volume of groundwater recovered.

GROUNDWATER TREATMENT

The selection of an appropriate groundwater treatment system was based on the expected flow rate of the extraction system, the influent contaminant concentrations of the groundwater, and discharge limits. Based on the available data, it appears that air stripping is the most feasible and cost-effective method for treatment of recovered groundwater. The treated effluent will be discharged to a nearby open drainage ditch. A 2-inch diameter discharge line will be installed from the system compound to the drainage ditch.

The discharge will be sampled monthly and the discharge monitoring reports (DMRs) submitted to ADEM in accordance with the permit requirements. A copy of the NPDES Permit Application is included in Appendix E.

SITE PREPERATION ACTIVITIES

Site preparation activities will be conducted prior to system arrival at the property and will include the following activities.

LOCAL PERMITTING

Three Notch and any subcontractors engaged to work on this project will obtain all necessary permits from the City of Brewton for the required construction activities. The anticipated costs for obtaining these permits have been factored into the proposed cost for the system installation phase of this project.

SYSTEM INSTALLATION AND START-UP ACTIVITIES

The MPE system, and all ancillary equipment, will be delivered to the site within 90 days of the approval from ADEM. A professional geologist or engineer experienced in MPE system operation and an environmental technician will be on site to observe installation and start-up activities.

EQUIPMENT REVIEW

An equipment manual and troubleshooting guide will be provided to Three Notch by the equipment supplier prior to system arrival. Appropriate Three Notch personnel will familiarize themselves with the manual before starting and operating equipment.

SYSTEM OFFLOADING AND PLACEMENT

The system and all ancillary equipment will be transported on a trailer and offloaded with a crane. The system will be placed on a concrete slab or gravel pad constructed in the approximate location illustrated in the figures in Appendix B. Above ground system components will be enclosed within a chain link security fence complete with locking gates in an effort to prevent unauthorized personnel from entering the equipment compound.

UTILITY CONNECTIONS

The electrical connections will be completed by Three Notch's subcontractor in accordance with local requirements.

INITIAL START-UP AND OPTIMIZATION

Three Notch will notify the ADEM project manager within a minimum of 15 days prior to initiating start-up activities.

Once all connections have been made, each electric motor will be visually tested prior to initiating long-term operation. This will encompass momentarily operating each motor individually and verifying proper rotation.

The MPE system will be temporarily operated for a period of four to eight hours. During this time, system components will be checked and monitored to ensure the system is operating as expected. Alarm conditions will be manually simulated to verify that automatic shutdown operations will occur if system upset conditions occur.

The following observations will be monitored and analyzed as appropriate:

- Extraction Rate (air and liquids)
- Vacuum at the LRVP and at each extraction well
- Influent vapor concentrations (PID measurements)

Prior to shutting down system operations, samples will be collected as follows:

- Influent water sample from the sampling port prior to the AWS
- Effluent water sample at discharge point from the AS
- Influent air sample at the inlet of the LRVP

Water samples will be submitted under chain-of-custody protocol to a credentialed laboratory to be analyzed for BTEX/MTBE/Naphthalene, and Oil and Grease in accordance with EPA methods 8260B and 1664, respectively. In the event that a discharge limit is exceeded, the data will be analyzed and modifications to the system will be performed as needed. The start-up/optimization process will be repeated, and additional samples will be collected in an effort to obtain satisfactory discharge limits prior to permanent start-up of the system.

PERMANENT START-UP

The system will be permanently started once it is observed that the treatment system is capable of producing effluent discharge within the required limits. Once permanent operations are initiated, Three Notch personnel will remain on site for a minimum of one day to monitor system performance. Modifications will be made as necessary in an effort to enhance system operations. Operation parameters monitored during system testing activities will be evaluated further during this time.

SYSTEM OPERATION AND MAINTENANCE

Upon the completion of the initial optimization, Three Notch will implement an Operation and Maintenance (O&M) program to adequately monitor system performance.

OPERATION AND MAINTENANCE ACTIVITIES

Full scale operations will include O&M of the system and continuing optimization of system performance. Scheduled visits will be made to maintain the system components and ensure the system is operating at the greatest efficiency possible. Minor system components will be

regularly inspected and replaced as required. All pumps within the unit will be serviced on a routine basis. If a shutdown of the system occurs, Three Notch will attempt to repair the system within 36 hours of receiving notification of shutdown. The remote start capability of the telemetry system installed in the unit may be utilized to start-up the system following certain shutdown conditions such as interruptions of electrical service once the oxidizer is removed once the oxidizer is removed. The telemetry can also be utilized to remotely shut-down the system should it become necessary due to an equipment failure or disruption.

Typical O&M activities will include the following:

- Visual inspection of the treatment system components (including pipe connections and bolted flange plates for potential leaks due to vibration)
- Cleaning, inspection, and testing of float switches and conductivity probes
- Monitoring of vacuum levels at designated points in the system
- Monitoring pressure levels on the exhaust side of the LVRP
- Removal of silt and sludge build up from the knockout tank, filtration system, and other system components
- Removal of air stripper foulants
- Monitor destruction efficiency of the granular activated carbon once employed for off- gas treatment
- Treated groundwater effluent sample collection
- Monitor groundwater levels

In order to ensure the system is working properly, during the first quarter of operation, technicians will visit the site weekly. At least twice per month, routine O&M activities as described above will also be conducted. System data, including total operational system hours, temperatures, total system vacuum, individual recovery well vacuums, flow, and water discharge will be recorded for inclusion in quarterly reports to ADEM.

All activities will be performed in accordance with the Quality Assurance/Quality Control Plan and Site Health and Safety Plan included in Appendices F and G, respectively.

QUARTERLY SAMPLING

As part of O&M activities, a groundwater monitoring event will be conducted once per quarter to evaluate the effectiveness of the remediation system. Three Notch recommends that each of the wells be sampled during the quarterly groundwater monitoring activities.

Prior to sample collection, the depth to groundwater will be measured using an oil/water interface probe. Each monitoring and recovery well will be purged using clean plastic disposable bailers. Approximately three well volumes will be removed from each well. The purge water will be processed through the MPE system.

Samples will be collected using clean plastic disposable bailers and shipped in laboratory supplied 40-mL vials preserved with hydrochloric acid (HCl). The samples will be placed on ice and transported, under chain-of-custody protocol, to the laboratory for analysis of BTEX/MTBE/Naphthalene in accordance with EPA method 8260B. All sampling shall be completed in accordance with the procedures set forth in the Quality Assurance/Quality Control Plan.

Groundwater effluent samples will be collected monthly. Effluent samples will be collected from a sample port downstream of the air-stripper treatment unit. Effluent samples will be collected in laboratory-supplied 40-mL vials preserved with HCl. Oil and Grease samples will be collected in one liter glass jars preserved with sulfuric acid (H_2SO_4). These samples will be packed on ice and transported, under chain-of-custody protocol, to the laboratory for analysis for total BTEX/MTBE/Naphthalene, pH, and Oil and Grease in accordance with EPA Methods 8260B, 150.1, and 1664.

Quarterly Corrective Action System Effectiveness Monitoring Reports (CASEMR) will be completed in accordance with ADEM requirements. The reports will include a summary of all current and historic sample analysis data with corresponding figures and tables, summary of gallons of treated groundwater to date, and a discussion of system effectiveness/run time. The reports will include recommendations for adjustments to the system, if any, and an estimate of the time required for completion of remediation activities.

PROPOSED REPORTING REQUIREMENTS

Three Notch will submit reports in accordance with ADEM requirements. These reports will include the following:

REPORTING OF CORRECTIVE ACTION IMPLEMENTATION

This report will be submitted within 120 days of CAP approval. This report will include as-built drawings of the system, analytical results of the first sampling event and copies of all permits issued to date.

START-UP NOTIFICATION

This report will provide start-up notification within 15 days of corrective action start-up.

REPORTING OF CORRECTIVE ACTION EFFECTIVENESS

Three Notch will submit corrective action system effectiveness monitoring reports (CASEMR) on a quarterly basis. The CASEMR will summarize field activities and the progress of the system towards meeting the ACALs for the site. The following data will be included in each report: groundwater elevations, a calculation of the volume of vapor-phase hydrocarbons removed, volume of groundwater treated, and groundwater analytical results. The reports will also include system effectiveness and recommendations concerning any additional modifications deemed necessary.

REQUEST FOR CLOSURE EVALUATION OF CORRECTIVE ACTION

The remediation goals for this project include reduction of dissolved-phase hydrocarbon concentrations to levels below the ACALs established during the ARBCA. This report will include data that shows that remediation goals have been achieved and request No Further Action (NFA) status. Methods for removal of equipment and abandonment of monitoring and recovery wells will be described.

SITE CLOSURE REPORT

This report will describe in detail the closure of the site and abandonment of all monitoring and recovery wells.

SCHEDULE OF IMPLEMENTATION

Task	Time Following CAP Approval
Order System Equipment	10 days
Site Preparation Activities	30 Days
Install System Components	120 days
Initial Start-Up /Optimization	150 days
Quarterly Monitoring of system and evaluation of results with recommendations for system enhancements, if necessary	5 - 6 Years
System shut down and removal of system equipment; rebound monitoring, well abandonment; completion and submittal of final report	5 - 7 Years

ESTIMATED COST

All costs associated with the system purchase, system installation, and the first four quarters of system O&M are presented on the ATTF Cost Proposals CP-13 through CP-18, which accompany the submittal of this plan.

APPENDICES

Tables	A
Figures	B
Site Location USGS Topographic Map	
Site Map with Utility and Well Locations	
Lithologic Cross-Section Location Map	
Soil Analytical Map	
Potentiometric Surface Map - July 7, 2025	
Groundwater Analytical and Benzene Contour Map - July 7, 2025	
Proposed System Layout Map	
Piping Cross Section and Manifold Detail	
Recovery Well Diagram	
Equipment Specifications	C
Air Division Permit Application	D
NPDES Permit Application	E
Quality Assurance/Quality Control Plan	F
Site Health and Safety Plan	G
ADEM Forms	H
UST Release Fact Sheet	
UST Site Classification System Checklist	
Tasks Performance Summary	I



THREE
NOTCH
GROUP

TABLES



APPENDIX A

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-1		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	25.5	SCREEN LENGTH (FT):	10	CASING ELEV (FT ABOVE MSL):	184.60	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-2		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	25.5	SCREEN LENGTH (FT):	10	CASING ELEV (FT ABOVE MSL):	184.90	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-3		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	30.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	184.20	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-3	02/20/24	20-25	<0.007	<0.007	<0.038	<0.007	<0.007	BDL	<0.038
MW-3	02/20/24	25-30	<0.009	<0.009	0.0490	0.0090	0.0570	0.115	<0.045
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-3		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	30.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	184.20	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-4		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	30.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.00	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-5		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	39.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	184.86	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table									
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SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-6		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.19	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

SOIL ANALYTICAL SUMMARY (mg/Kg)	
As	0.05
Cd	0.01
Cu	0.10
Pb	0.02
Hg	0.001
Mn	100
Mo	0.05
Ni	0.10
Se	0.01
Co	0.01
Zn	100
Cr	100
Fe	10000
Al	10000
S	1000
Ca	10000
Mg	10000
K	10000
Na	10000
Cl	10000
F	10000
B	10000
I	10000
Br	10000
Li	10000
Rb	10000
Sr	10000
Y	10000
Zr	10000
Nb	10000
Mo	10000
Ta	10000
W	10000
Re	10000
Os	10000
Ir	10000
Pt	10000
Au	10000
Ag	10000
Cd	10000
Pb	10000
Hg	10000
Cu	10000
As	10000
Cr	10000
Mn	10000
Fe	10000
Al	10000
S	10000
Ca	10000
Mg	10000
K	10000
Na	10000
Cl	10000
F	10000
B	10000
I	10000
Br	10000
Li	10000
Rb	10000
Sr	10000
Y	10000
Zr	10000
Nb	10000
Mo	10000
Ta	10000
W	10000
Re	10000
Os	10000
Ir	10000
Pt	10000
Au	10000
Ag	10000
Cd	10000
Pb	10000
Hg	10000
Cu	10000
As	10000
Cr	10000
Mn	10000
Fe	10000
Al	10000
S	10000
Ca	10000
Mg	10000
K	10000
Na	10000
Cl	10000
F	10000
B	10000
I	10000
Br	10000
Li	10000
Rb	10000
Sr	10000
Y	10000
Zr	10000
Nb	10000
Mo	10000
Ta	10000
W	10000
Re	10000
Os	10000
Ir	10000
Pt	10000
Au	10000
Ag	10000
Cd	10000
Pb	10000
Hg	10000
Cu	10000
As	10000
Cr	10000
Mn	10000
Fe	10000
Al	10000
S	10000
Ca	10000
Mg	10000
K	10000
Na	10000
Cl	10000
F	10000
B	10000
I	10000
Br	10000
Li	10000
Rb	10000
Sr	10000
Y	10000
Zr	10000
Nb	10000
Mo	10000
Ta	10000
W	10000
Re	10000
Os	10000
Ir	10000
Pt	10000
Au	10000
Ag	10000
Cd	10000
Pb	10000
Hg	10000
Cu	10000
As	10000
Cr	10000
Mn	10000
Fe	10000
Al	10000
S	10000
Ca	10000
Mg	10000
K	10000
Na	10000
Cl	10000
F	10000
B	10000
I	10000
Br	10000
Li	10000
Rb	10000
Sr	10000
Y	10000

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-6	05/20/24	20-25	<0.002	0.064	0.082	0.014	0.061	0.221	<0.010
MW-6	05/20/24	25-30	<0.002	0.006	<0.010	<0.002	0.004	0.010	<0.010
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-6		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.19	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-7		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	38.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	183.35	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-8		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	39.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	178.75	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-9		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	181.89	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-10		
INSTALLATION DATE:	05/22/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.06	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-11		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.95	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-11	05/21/24	20-25	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
MW-11	05/21/24	25-30	<0.002	0.009	0.258	0.137	0.812	1.216	0.031
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-11		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.95	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-12		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	39.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	182.75	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-13		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	182.84	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-14		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	181.73	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-15		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	180.34	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-15	08/13/24	10-20	<0.009	<0.009	<0.046	<0.009	<0.009	BDL	<0.046
MW-15	08/13/24	20-30	<0.009	<0.009	<0.048	<0.009	<0.009	BDL	<0.048
SSTLs:			87.6	0.0763	8.83	32.6	13.1	-	11.7

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-15		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	180.34	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-16		
INSTALLATION DATE:	08/15/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	181.11	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-17		
INSTALLATION DATE:	08/15/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	181.04	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-18		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.72	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-18	08/13/24	10-20	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
MW-18	08/13/24	20-30	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-18		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.72	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-19		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.76	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-19	08/12/24	10-20	<0.008	<0.008	<0.043	<0.008	<0.008	BDL	<0.043
MW-19	08/12/24	20-30	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-19		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.76	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-20		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.54	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-21		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.52	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	VW-1		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	47.5	SCREEN LENGTH (FT):	5	CASING ELEV (FT ABOVE MSL):	184.47	WELL TYPE: DIAMETER (IN):	III 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
VW-1	05/21/24	15-20	<0.007	1.32	59.8	34.5	130	225.620	1.49
VW-1	05/21/24	25-30	<0.002	0.281	<0.400	0.287	0.313	0.881	0.04
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	VW-1		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	47.5	SCREEN LENGTH (FT):	5	CASING ELEV (FT ABOVE MSL):	184.47	WELL TYPE: DIAMETER (IN):	III 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	VW-2		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	50.0	SCREEN LENGTH (FT):	5	CASING ELEV (FT ABOVE MSL):	185.40	WELL TYPE: DIAMETER (IN):	III 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
VW-2	08/14/24	10-20	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
VW-2	08/14/24	20-30	<0.008	<0.008	<0.043	<0.008	<0.008	BDL	<0.043
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	VW-2		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	50.0	SCREEN LENGTH (FT):	5	CASING ELEV (FT ABOVE MSL):	185.40	WELL TYPE: DIAMETER (IN):	III 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-1		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.63	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
RW-1	08/14/24	10-20	<0.009	<0.009	<0.048	<0.009	<0.009	BDL	<0.048
RW-1	08/14/24	20-30	<0.008	0.013	5.49	3.15	42.5	51.153	1.70
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-1		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.63	WELL TYPE: DIAMETER (IN):	II 4

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-2		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	184.47	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
RW-2	08/14/24	10-20	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
RW-2	08/14/24	20-30	<0.009	0.014	0.110	0.022	0.113	0.259	<0.047
Source Soil SSTLs:			71.8	68.5	789	363	453	-	371
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-2		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	184.47	WELL TYPE: DIAMETER (IN):	II 4

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-3		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	183.63	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-4		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	183.89	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
RW-4	08/13/24	10-20	<0.008	<0.008	<0.044	<0.008	<0.008	BDL	<0.044
RW-4	08/13/24	20-30	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-4		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	183.89	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-5		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	184.88	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
RW-5	08/13/24	10-20	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
RW-5	08/13/24	20-30	<0.009	<0.009	<0.045	<0.009	<0.009	BDL	<0.045

SSTLs:	941	0.5	94.9	350	141	-	125
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POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

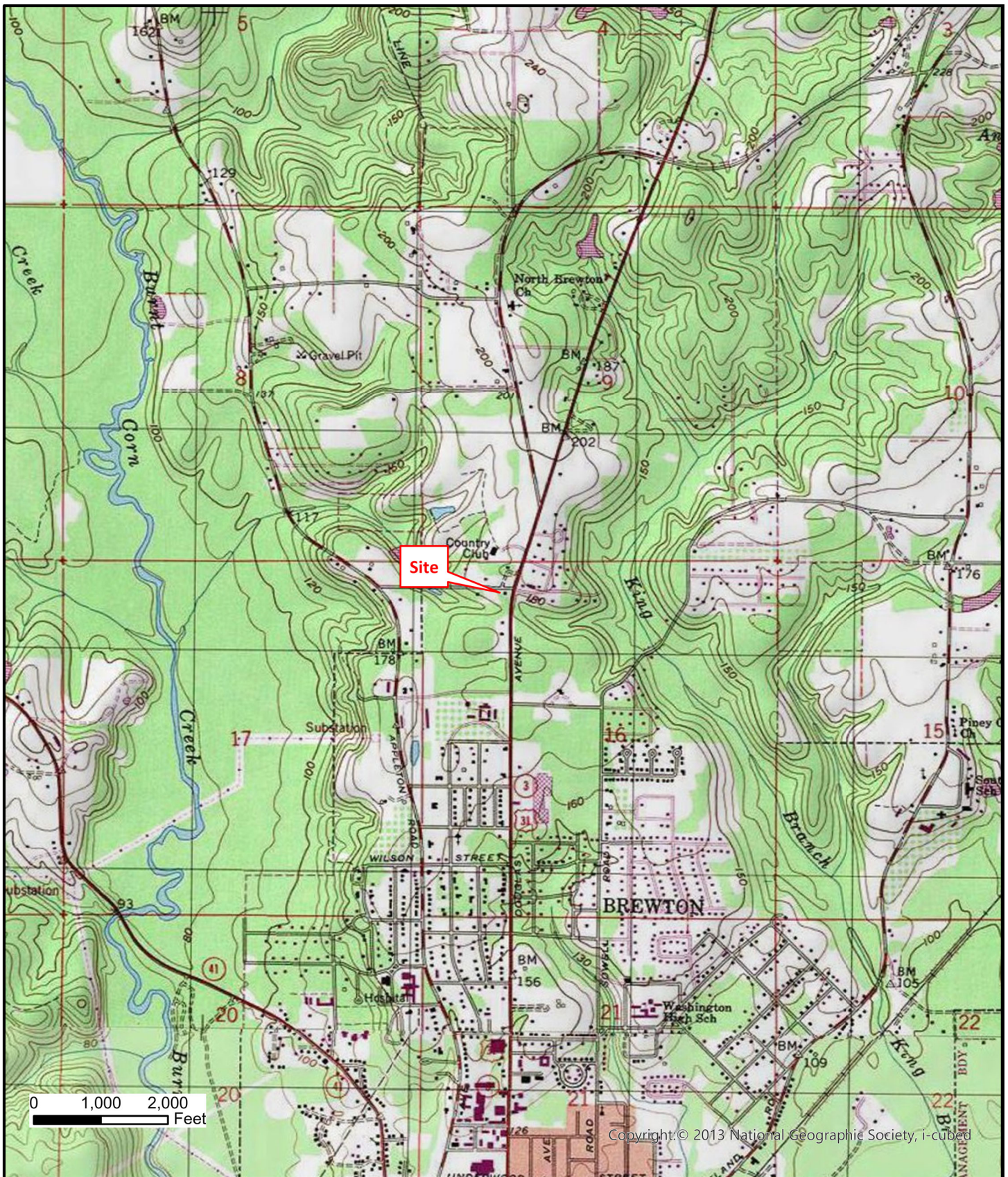
[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-5		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	184.88	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

FIGURES



Copyright: © 2013 National Geographic Society, i-cubed

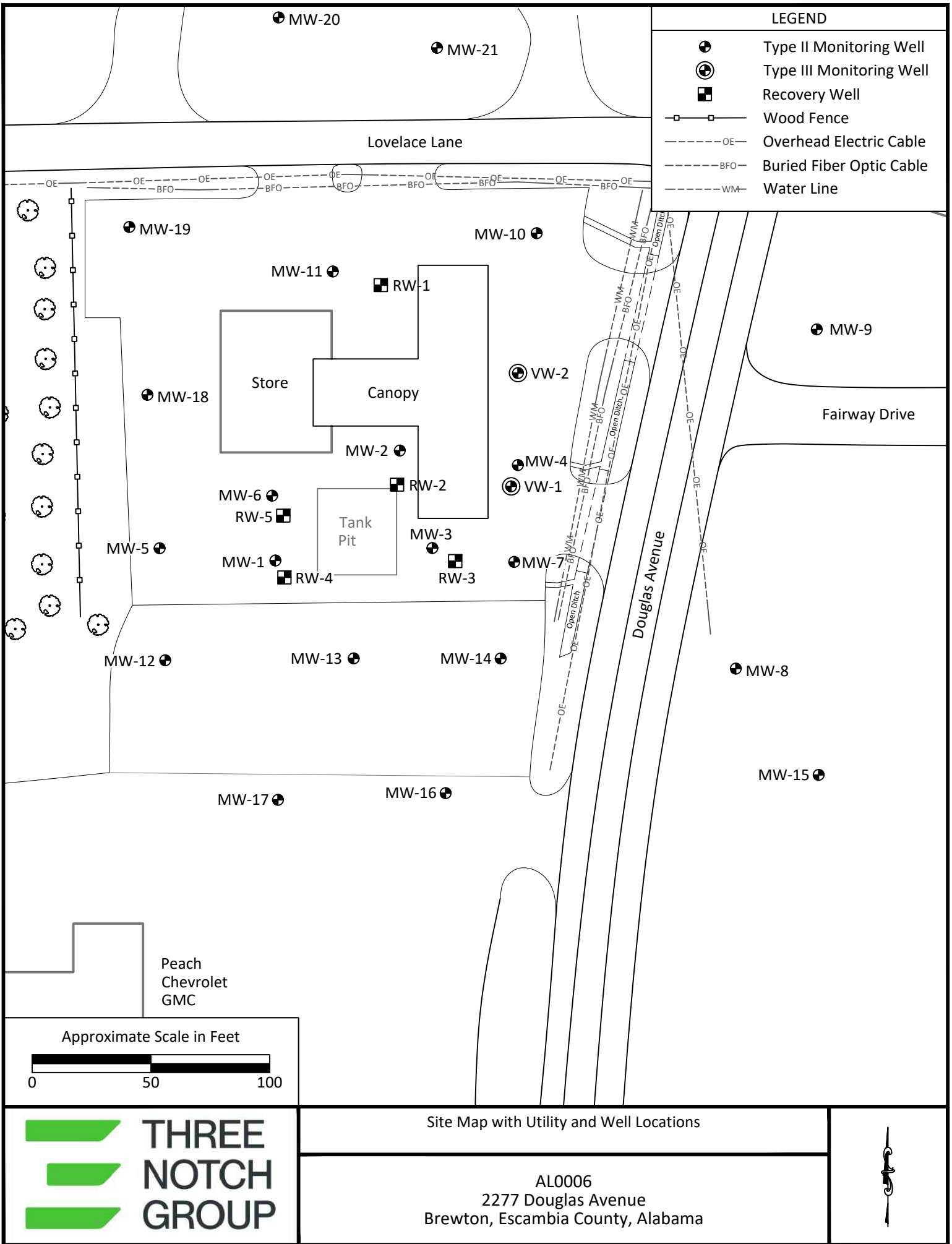


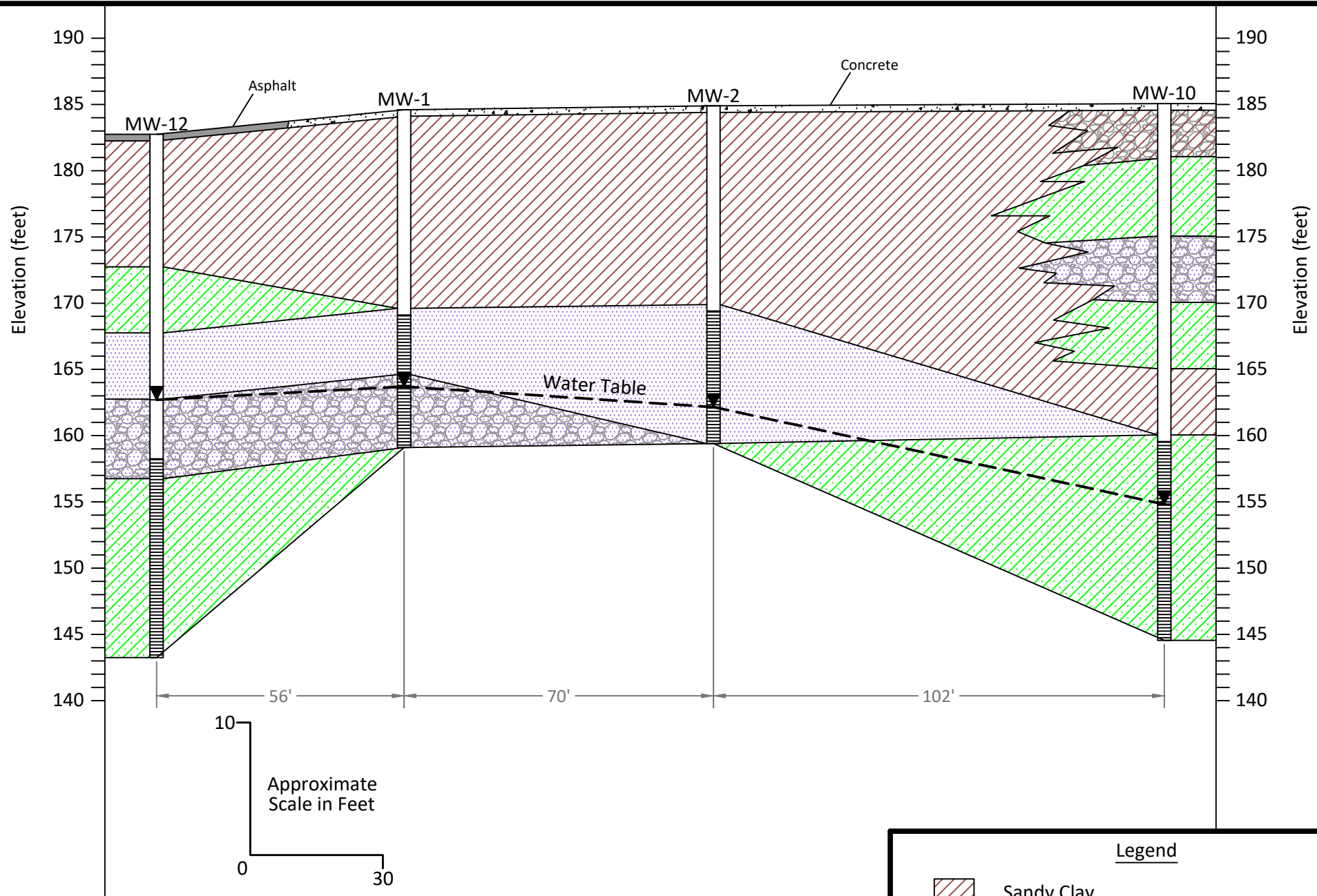
**THREE
NOTCH
GROUP**

Site Location USGS Topographic Map

AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama



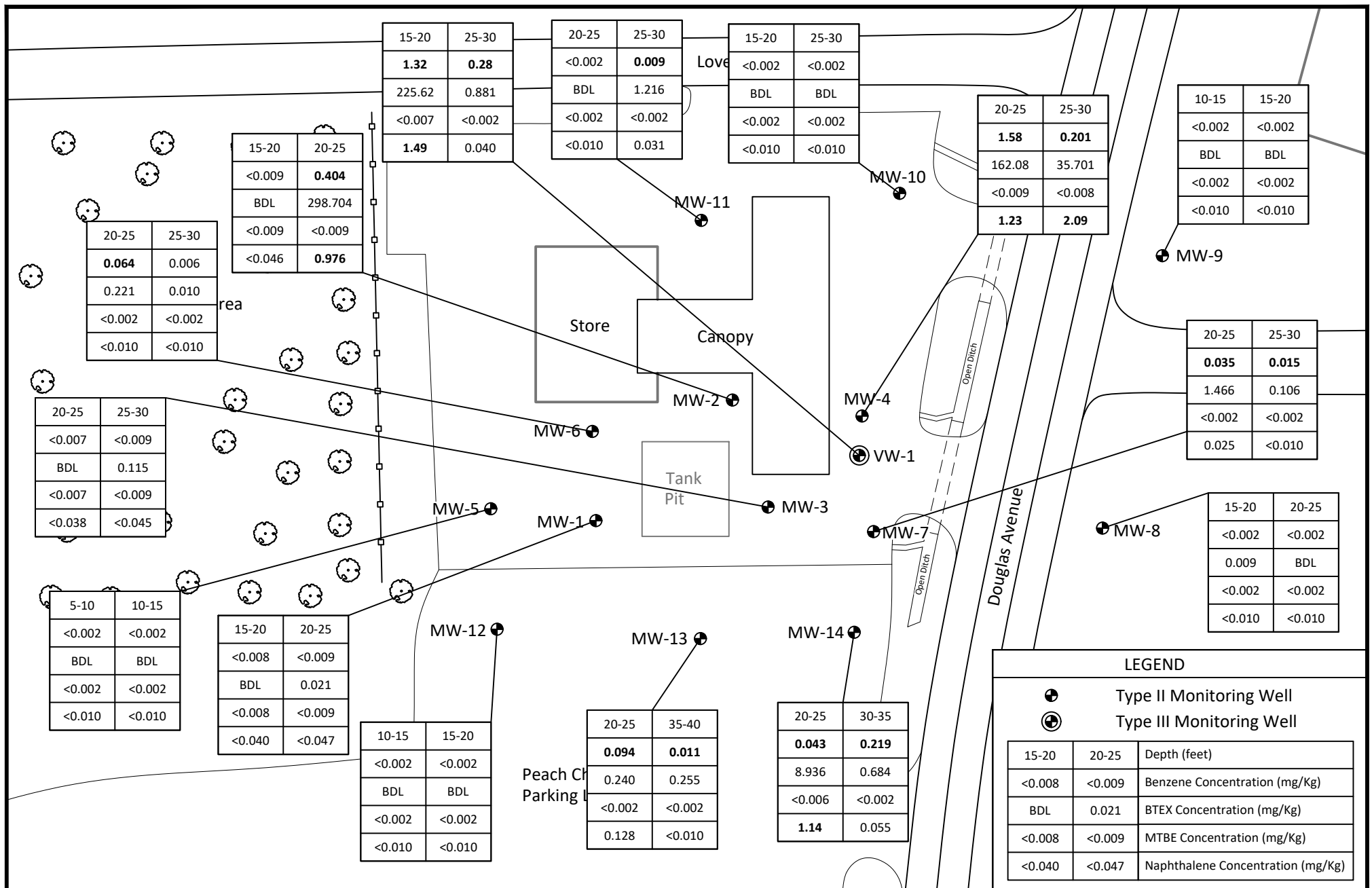




Lithologic Cross-Section

AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama

- Legend**
- Sandy Clay
 - Gravelly Clay
 - Sand
 - Gravelly Sand
 - Clayey Sand
 - Screened Interval
 - Groundwater Level

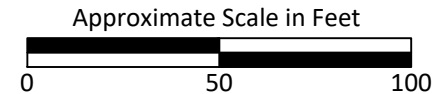


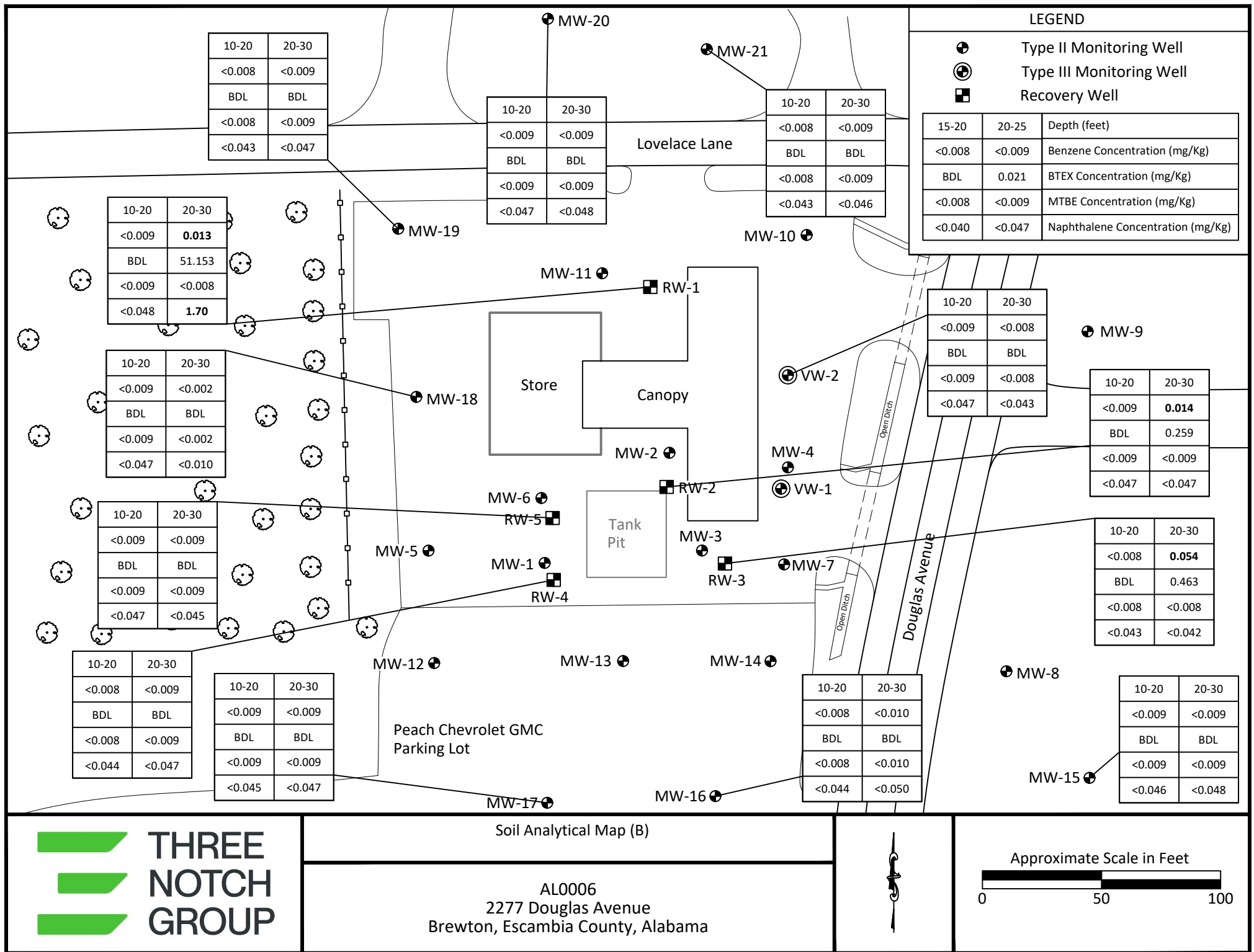
LEGEND		
	Type II Monitoring Well	
	Type III Monitoring Well	
15-20	20-25	Depth (feet)
<0.008	<0.009	Benzene Concentration (mg/Kg)
BDL	0.021	BTEX Concentration (mg/Kg)
<0.008	<0.009	MTBE Concentration (mg/Kg)
<0.040	<0.047	Naphthalene Concentration (mg/Kg)



Soil Analytical Map (A)

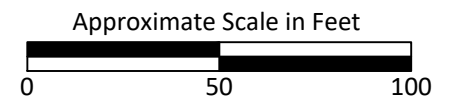
AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama

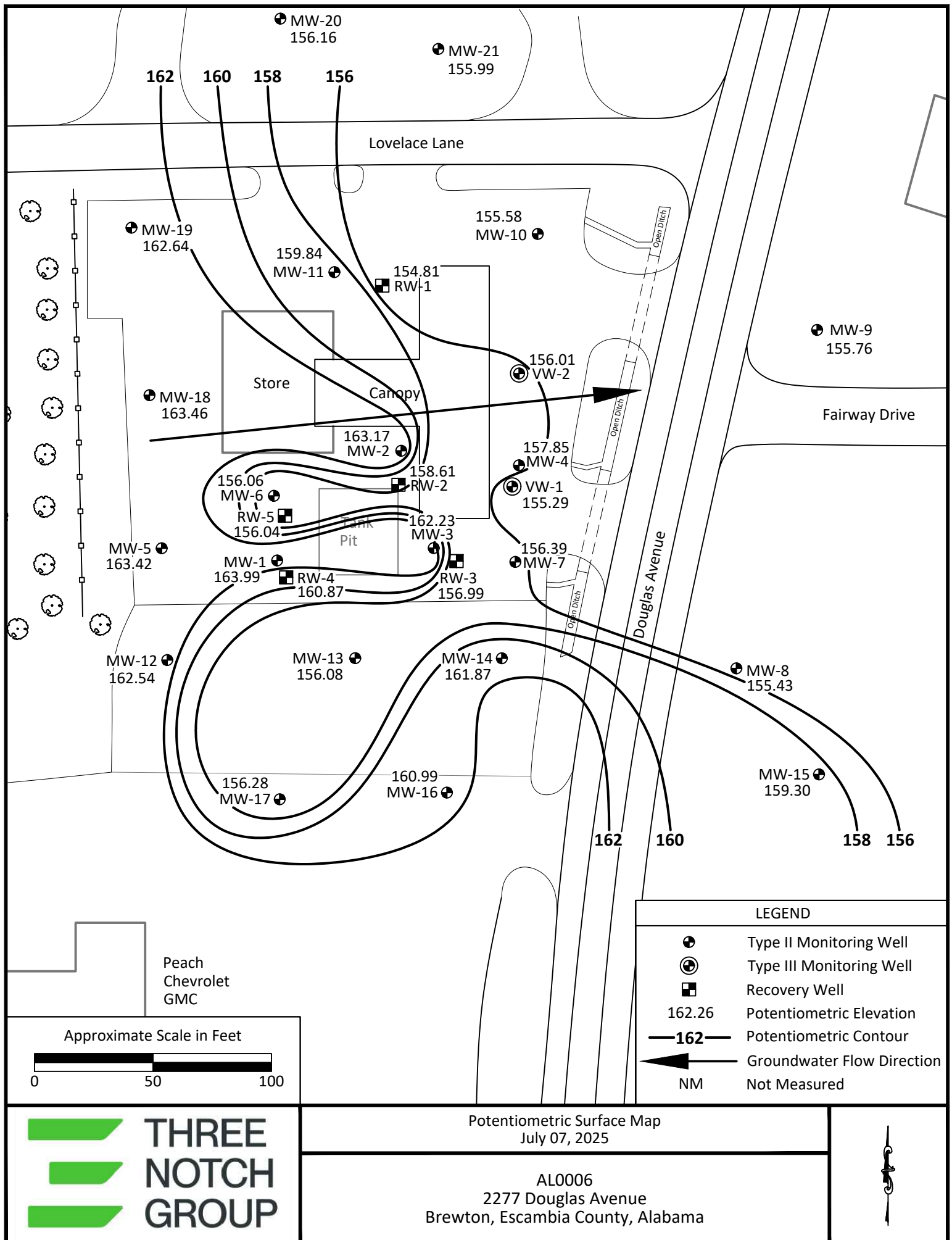


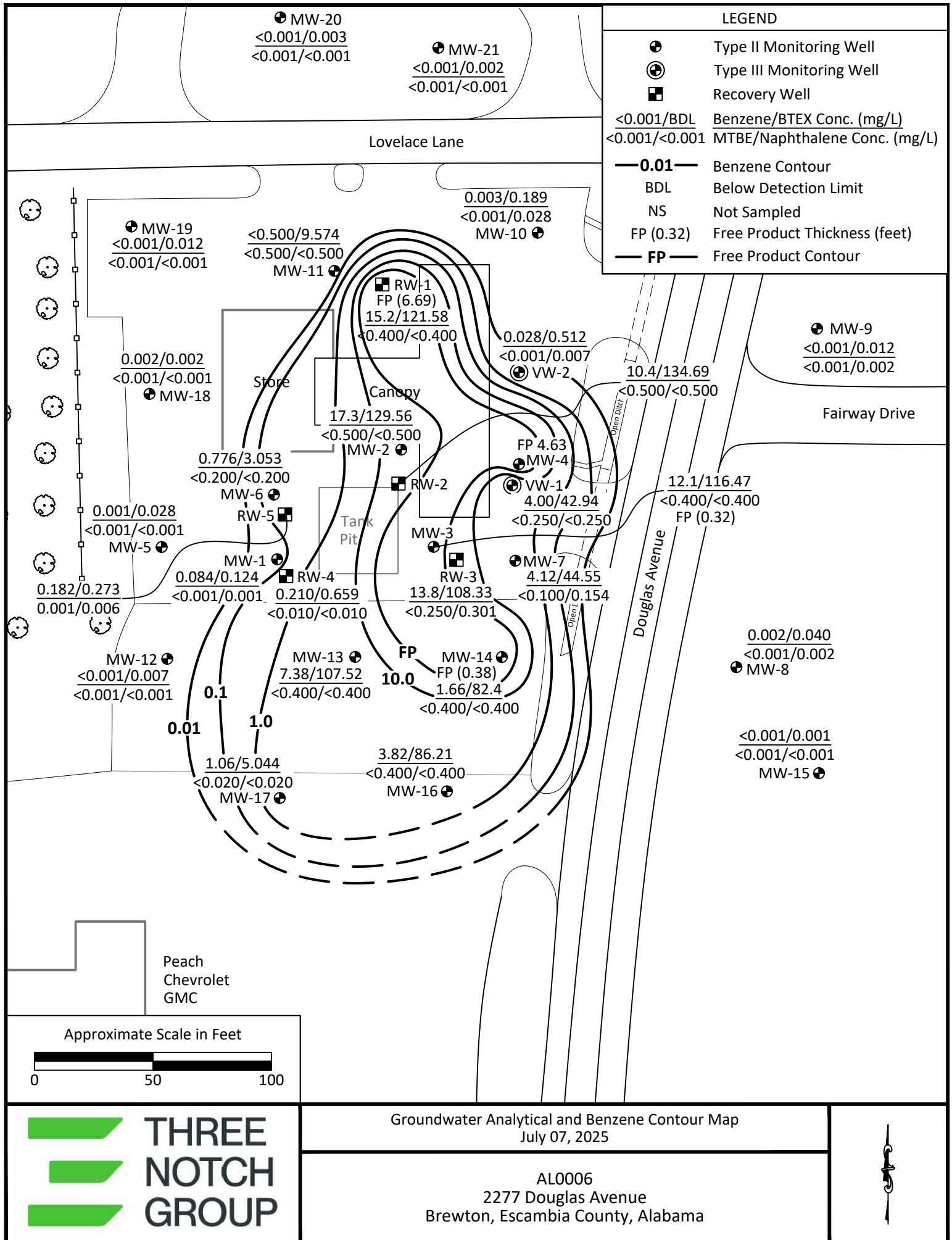


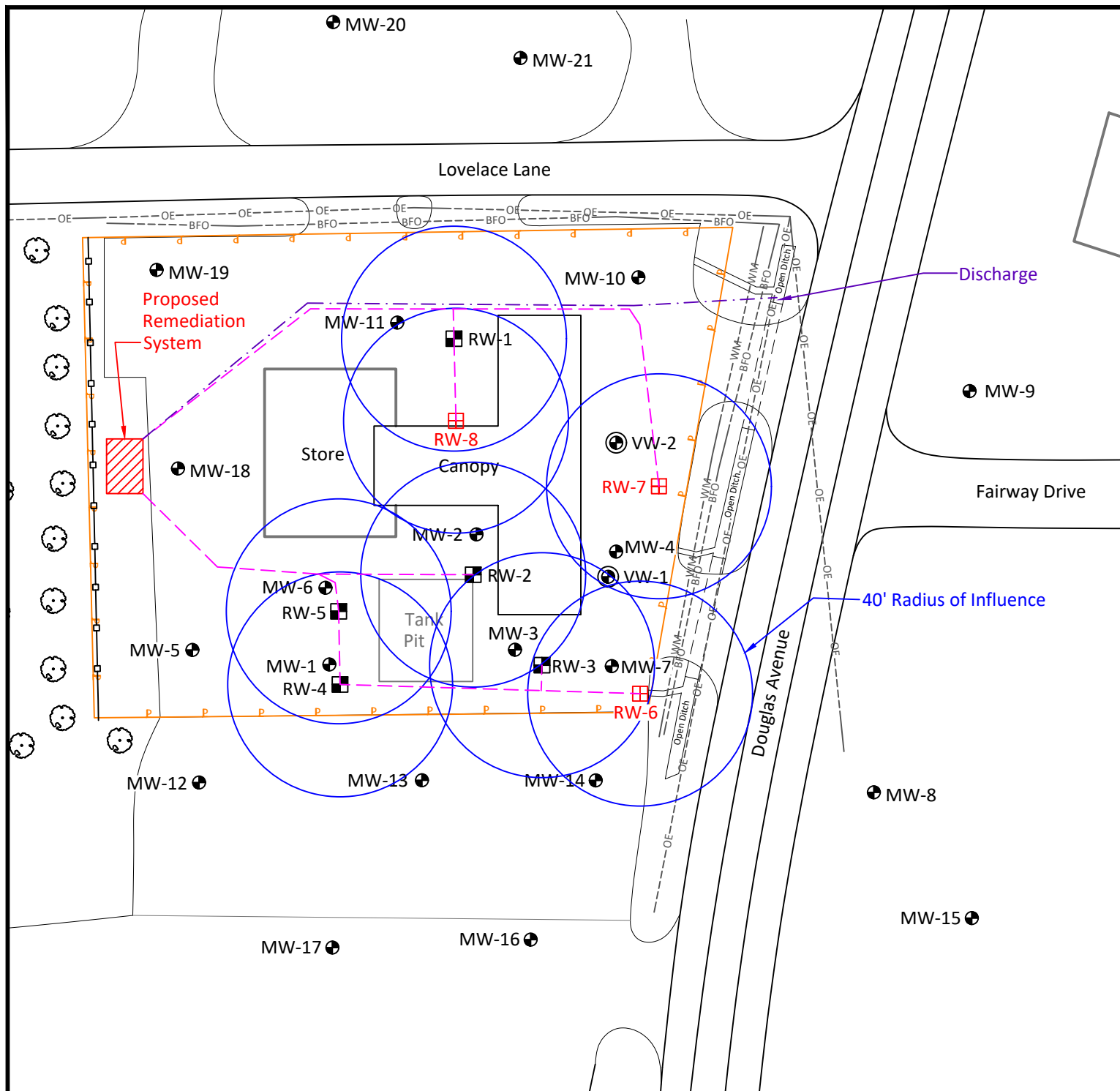
Soil Analytical Map (B)

AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama









Peach
Chevrolet
GMC

Approximate Scale in Feet



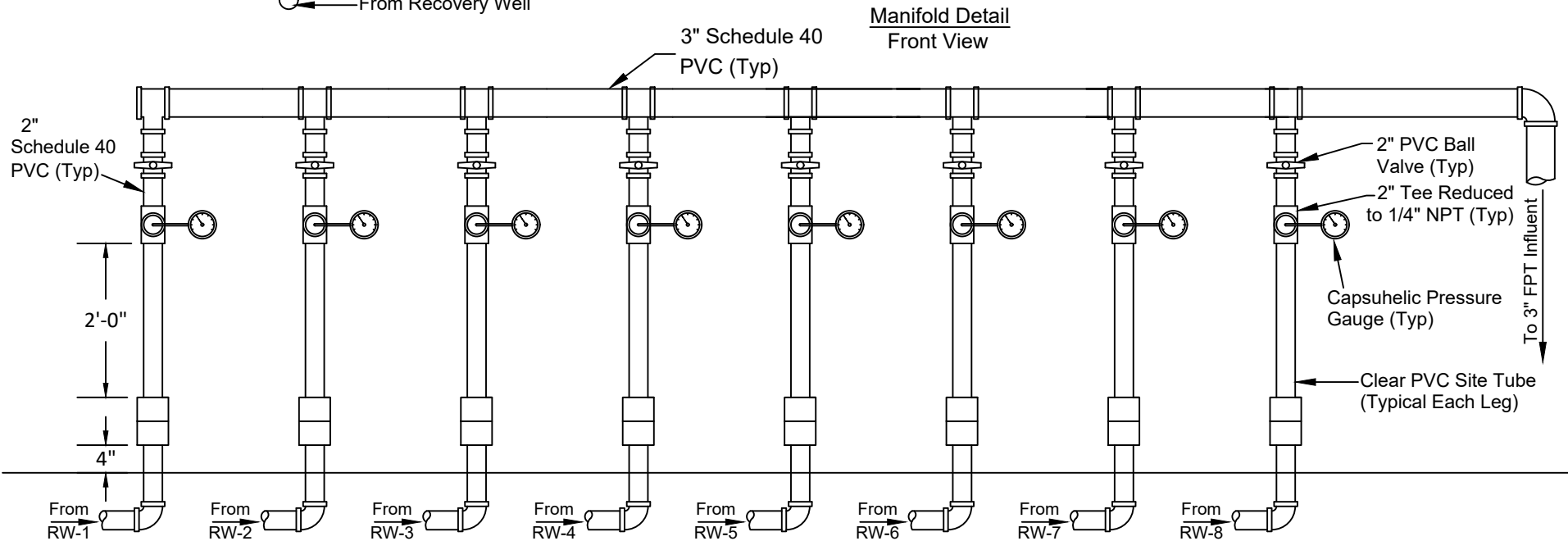
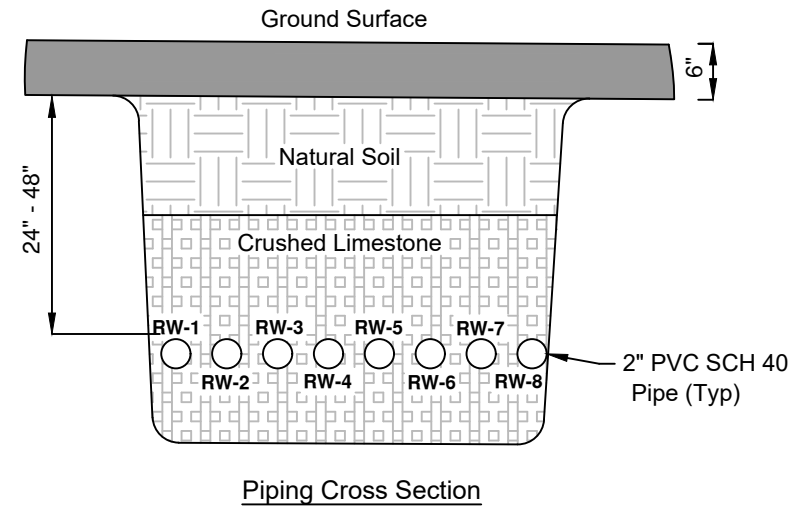
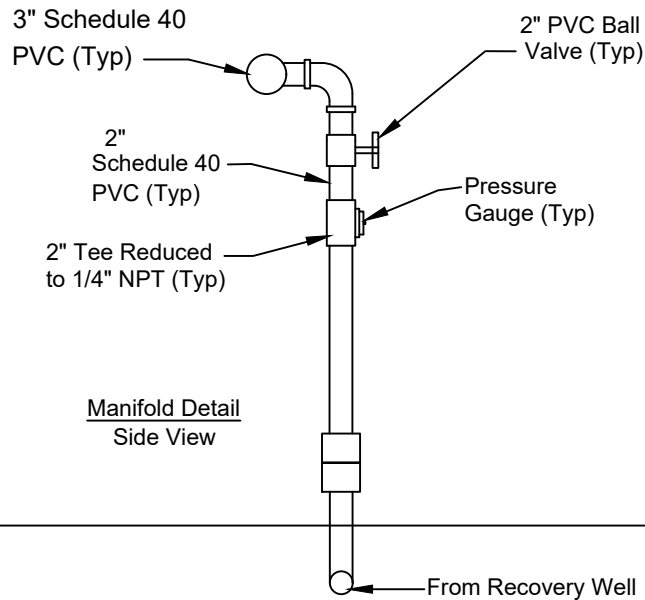
LEGEND

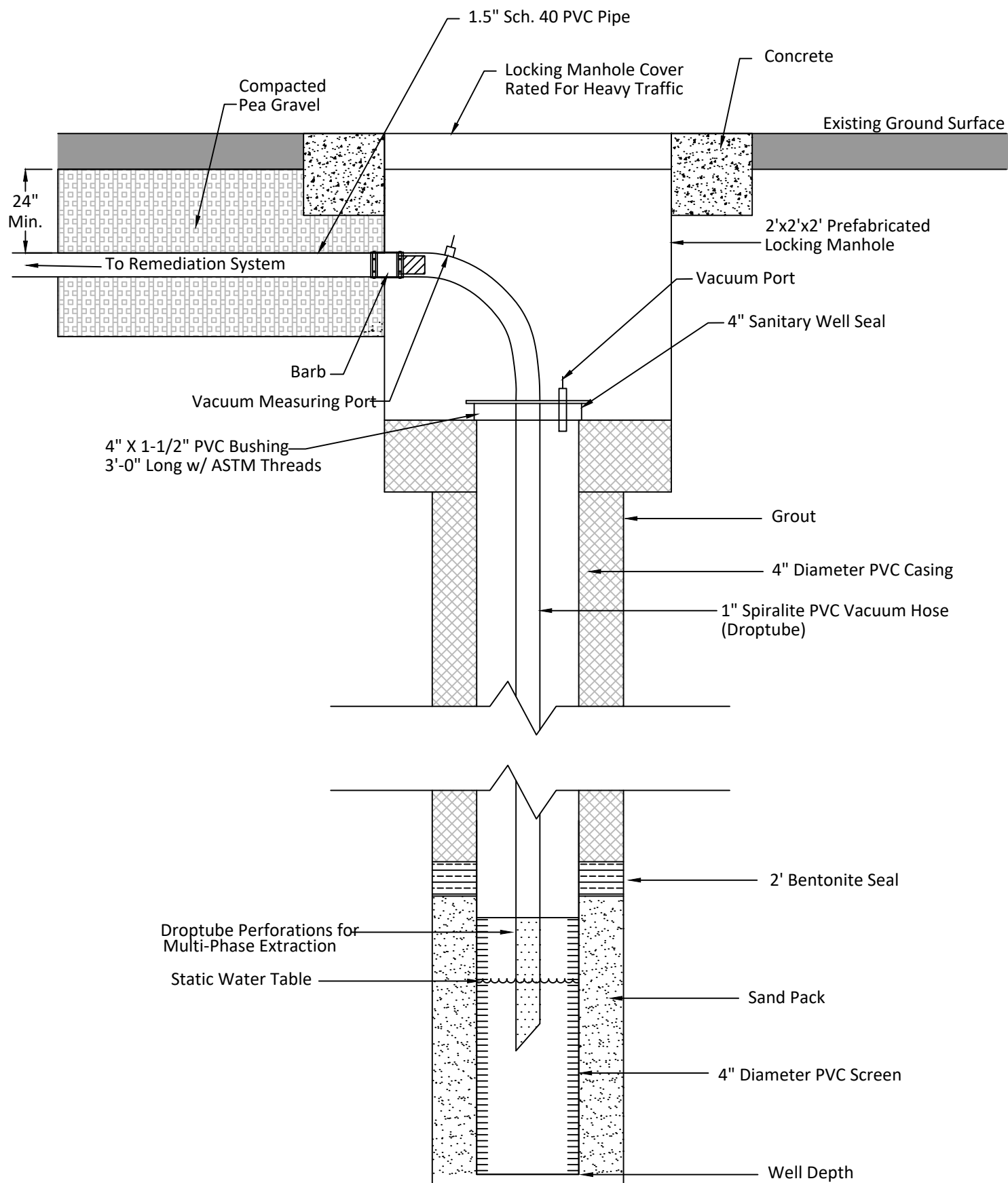
	Type II Monitoring Well		Buried Fiber Optic Cable
	Type III Monitoring Well		Water Line
	Recovery Well		Proposed Recovery Well
	Wood Fence		Proposed Recovery Well Piping
	Property Line		Proposed Discharge Piping
	Overhead Electric Cable		Benzene Contour (April 18, 2025)

Proposed System Layout Map

AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama







Recovery Well Construction Detail

AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama

NOT TO SCALE



**THREE
NOTCH
GROUP**

EQUIPMENT SPECIFICATIONS



LGWS/CrossAmerica Partners
600 Hamilton St., Suite 500
Allentown, PA 18101

09/02/25
CP-10
Quote

Project: AL0006
2277 Douglas Ave.
Brewton, Escambia Co., AL

Three Notch is pleased to provide this quote for the following refurbished equipment purchase:

- (1) Three Notch supplied DPVE Package sytem and building:
- 40 HP single stage oil sealed liquid ring blower with 490 ACFM @ 20" Hg
 - 200 gallon air/water separator
 - 1.5 HP transfer pumps
 - 15 GPM oil/water separator and air stripper treatment system
 - Groundwater flow totalizer with pulse output for remote totalization
 - FleetZoom FZ300 cellular wireless telemetry
 - Master control panel system
 - System Building, 8.5'W x 12'L x 9.5'H aluminum/stell fully insulated enclosure
 - AWS3 Knock out drum
 - Remediation System and Oxidizer Interlock Controls
- (1) System delivery freight services to site. Off and on loading services not included.

Pricing:

Equipment
Purchase

- Three Notch Supplied Refurbished DPVE Package System and Building
- Freight Services to site

	Amount
- Three Notch Supplied Refurbished DPVE Package System and Building	\$109,000.00
- Freight Services to site	\$2,500.00

Notes:

12-month warranty starts upon delivery to site.

MK ENVIRONMENTAL INC.

765 Springer Drive
Lombard, IL. 60148-6412
615-392-7737 (direct)

jgiltz@mkenv.com

QUOTATION

Date 9/4/2025
Quote No. 225061B
Reference AL0006
Page No. 1 of 4
Freight Included
Terms PWP Net 180
Ship Via FLATBED
F.O.B. Factory

SOLD TO:	SHIP TO:
Anna Brunson Three Notch Group 11 W Court Square Andalusia, AL. 36420 334-222-9431 (office)	AL0006 2277 Douglas Ave. Brewton, AL.

Quotation valid for 30 days

QUANTITY		UNIT PRICE	AMOUNT
	400 amp 3/60/230 volt 4 wire plus ground electrical service Brought to NEMA 3R control Panel Interior electrical will comply with NEC requirements for Class 1, Division 2, Group D Hazardous locations Motors will be TEFC construction		
1	MK Environmental Refurbished System DPVE Package Including:	114,619.00	\$114,619.00
1	40.0 HP single stage oil sealed liquid ring blower 490 ACFM @ 20"Hg. Capacity 3/60/230-460 volt, TEFC motor Direct drive motor Oil Scavenge line Backpressure gauge Multistage filtration system allows operation over the full range of vacuums, Temperature gauge Y strainer with clean out plug High temperature switch low and high oil level switches inlet filter inlet check valve Includes extra 5 gallon bucket of replacement seal oil LRP heat exchanger recirculation sound box with hardware		
1	200 gallon Air/water separator with conductivity probe level switches 10" diameter clean out ports with vacuum rated quick release lid Clear PVC sight glass piping to liquid ring pump, to check for water carryover Liquid filled vacuum gauge Vacuum assist hose 2" drain valves Vacuum relief valve Dilution valve with filter/silencer Inlet screen		
1	1.5 hp transfer pump, 3450 rpm, TEFC motor Cast Iron housing with composite impeller, anti air lock design manual "Pump ON" button inside building for sampling		
1	10-Point dual phase inlet manifold inside system building including 4" main x (10) 2" branches, each branch includes; 2" throttling valve, vacuum gauge, 6" section of clear pvc site tube with quick Fernco disconnect 100' of bulk 2" clear tiger flex hose for stub up connection by others		
1	MKE Model SA15B STRIPPERATOR 15 GPM oil/water Separator and Air stripper treatment system Coalescing separator with skimming weir and water sump tank Low profile air stripping system with nylon aeration tubes and dual pattern diffusers 2.0 HP aluminum blower, AMCA B rated spark resistant Air pressure gauge Intrinsically safe high-high sump level and low blower pressure alarm switches Stainless steel construction Blower silencer		
1	1.5 hp transfer pump, 3450 rpm, TEFC motor Cast Iron housing with composite impeller, anti air lock design manual "Pump ON" button inside building for sampling		
1	Groundwater flow totalizer with pulse output for remote totalization Flow calibration button		

MK ENVIRONMENTAL INC.

Anna Brunson
Three Notch Group

Date 9/4/2025
Quote No. 225061B
Reference AL0006
Page No. 2 of 4

QUANTITY		UNIT PRICE	AMOUNT
1	<p>Master Control Panel System, Including:</p> <p>NEMA 3R control panel with blank front cover</p> <p>Swing out sub panel for gauges, control operators, and switches</p> <p>IEC Magnetic motor starters, safety switches, H-O-A controls</p> <p>Control transformer</p> <p>(8) intrinsically safe relays, (8) alarm indicator LED's, (16) output channels</p> <p>Hard wired relay logic</p> <p>(1) exterior GFCI utility outlet</p> <p>System run time totalizing hour meter</p> <p>Blower low pressure alarm</p> <p>Anti-falsing alarm circuit to prevent nuisance tripping</p> <p>Auto-release restart timer for remote restarts via telemetry</p> <p>Three phase voltage and phase monitor</p> <p>Emergency E-stop LED red indicator light located on swing out sub panel</p> <p><u>Liquid ring automatic shut down upon:</u></p> <p>AWS1 high liquid level</p> <p>Oil reservoir tank low and high level alarms</p> <p>Liquid ring High temperature alarm</p> <p>Air stripper blower low pressure</p> <p>Air stripper sump High liquid level alarm</p> <p>Phase fault condition</p> <p>Interior Emergency Stop Mushroom button with twist to release detent</p> <p>Oxidizer interlock controls</p>		
1	<p>Fused Main Disconnect system for liquid ring and oxidizer</p> <p>Includes: (1) 200 amp disconnect box for LRP & (1) 100 amp disconnect box for 300E.</p> <p>(1) Weatherhead with extension pole and bracket support</p> <p>(1) 400 amp Electric meter socket base installed</p>		
1	<p>FleetZOOM FZ300 Cellular Wireless Monitoring Unit. 14 Digital Inputs, 4 Digital Outputs, 2 Analog Input plus internal temperature and DC power monitoring. Includes: Cellular antenna, wiring diagrams, setup forms. Web based monitoring capabilities with graphing and data export. Email & SMS alarming capabilities.</p> <p>One full year of service starting at time of installation. Real Time Alarm Monitoring & Notification, Real Time Status Monitoring. Maximum of 500 alarm or status change events per month, plus sampling of all signals, transmitted every 60 minutes. Annual renewal service invoiced at end of each year, due Jan of following year. Renewal: \$420/yr per unit, BY OTHERS. (subject to change)</p>		
1	<p>Vacuum transducer integrated into telemetry system for real time monitoring, 4-20mA</p>		
1	<p>System building (refurbished)</p> <p>8.5'W x 12'L x 9.5'H aluminum/steel enclosure, fully insulated with</p> <p>Removable sliding wall panels for ease of maintenance</p> <p>Exterior grade plywood floor, structural steel frame</p> <p>Includes 100 watt XP interior light, and removable center grate for ease of maintenance</p> <p>The breaker panel and control panel will be mounted on a vertical steel bracket attached to platform end. The bracket, panels and all conduits will allow for the removal of the enclosure panels by one person.</p> <p>10" structural steel base with 4" steel cross members</p> <p>Steel corner posts and roof frame</p> <p>Continuous sheet aluminum roof for superior protection</p> <p>12,000 BTU XP heater with XP thermostat. All components fully piped, wired and factory tested</p>		

MK ENVIRONMENTAL INC.

Anna Brunson
Three Notch Group

Date 9/4/2025
Quote No. 225061B
Reference AL0006
Page No. 3 of 4

QUANTITY		UNIT PRICE	AMOUNT
1	AWS3 knock out drum prior to oxidizer to minimize condensed liquids from entering burner or future vapor phase carbon bed.		
1	Equipment Electrical Installation Includes XP wiring, XP seal off connectors, liquid tight flexible conduit UL listed equipment.		
1	Equipment Mechanical Installation Includes mounting, piping and connectors Brass fittings, sample ports, pressure gauges and sight glasses		
1	Third Party MET Certification The entire remediation building to be third party certified at MK Environmental factory. National Recognized Testing Lab (NRL)		
Notes: 1. Payment terms for the MK DPVE system package above will be pay when paid up to 180 days or two weeks after ADEM reimbursement which ever comes first. 2. 12-month manufacturers warranty clock starts upon shipment from MK factory or readiness to ship if any delays by others. 3. Quote valid for 30 days			
		EQUIP. SUB TOTAL	\$114,619.00
		EQUIP. SALES TAX	
		START UP/TRAINING	\$2,500.00
		FREIGHT	\$2,500.00
		NET TOTAL	\$119,619.00

Does not include permits, fees, etc...
Offloading & placement by others.

(MK DPVE System Only)
(MK DPVE System Only)

Jerry Giltz,
MK ENVIRONMENTAL, INC.

			AMOUNT
	MK Offgas Treatment Page: (Add to the Net Total)		
1	Catalytic Electric Oxidizer, 300 SCFM Oxidizer Process Information * Maximum Air Flow Capacity: 300 SCFM * Minimum Air Flow Capacity: 100 SCFM * Max Electric Pre-Heater Input: 30 KW * Heat Exchanger: Tube and Shell - 60% nominal * Minimum Catalyst Inlet Temperature: 600 degrees F * Average Catalyst Operating Temperature: 650 degrees F * Maximum Catalyst Operating Temperature: 1200 degrees F * Catalyst Volume: .5 cubic feet * Catalyst Gas Hourly Space Velocity: 41,000 GHSV-1 * Destruction Efficiency: > 98% * Maximum LEL Throughput: < 20% * Est Time to Reach Operating Temperature: 30 minutes from cold start * Noise Level: < 75 dBA at a distance of 10' * Inlet Connection: 4" Flanged * Outlet Connection: 6" Flanged * Foot Print: W=3', L=6', H=7' * Weight: 2,500 lbs. * Blower HP: 3 * Power Input: 230/3/60 * Full Load Amps: 88	88,725.00	\$88,725.00
1	Optional 2-pen chart recorder installed in the oxidizer master control panel. The 2-channel digital chart recorder will record the catalyst inlet & outlet temperatures	4,095.00	\$4,095.00
1	Start up and Training (two days including expenses) Please note: Start up and training is not an option and is the manufacturers final quality control measure to ensure reliability and validate the warranty.	6,500.00	\$6,500.00
1	Freight to Alabama Off loading and placement by others	4,000.00	\$4,000.00
	Payment Terms, Shipping Terms & Schedule <u>Payment Terms (Oxidizer)</u> Payment Terms:(based on \$ 92,820) 30% with order (\$ 27,846) 70% upon readiness to ship, net 30 days (\$ 64,974) <u>Payment Terms (startup and freight services)</u> Payment Terms (based on \$ 10,500) Net 30 days after services are provided/completed. <u>Shipping Terms</u> F.O.B. factory prepaid and added. Unit is a partial flatbed load (LTL) non-crated <u>Delivery</u> Schedule Approximately 12 weeks upon receipt of approved submittal. Notes: 1. Warranty claims for this oxidizer unit will go through the oxidizer manufacturer direct with support by MK Environmental.The product warranties are for a period of 12 months from the date of shipment. 2. Payment terms for the catox purchase see above. (Payment Terms, Shipping Terms & Schedule) 3. Quote valid for 30 days		
Does not include permits, fees, etc... Offloading & placement by others.		EQUIP. SUB TOTAL	\$103,320.00
		EQUIP. SALES TAX	
		START UP/TRAINING	
		FREIGHT	
Jerry Giltz, MK ENVIRONMENTAL, INC.		NET TOTAL	\$103,320.00

AIR DIVISION PERMIT APPLICATION

August 25, 2025

Ms. Rebecca Arthur
ADEM, Air Division
P.O. Box 301463
Montgomery, Alabama 36130-1463

RE: REQUEST FOR APPROVAL OF AIR EMISSION CONTROL
AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama
Facility I.D. No. 25265-053-018577
UST Incident No. UST24-12-05

Ms. Arthur:

LGWS/CrossAmerica Partners has been directed by the Alabama Department of Environmental Management (ADEM) Underground Storage Tank (UST) Corrective Action Section to perform corrective action activities at the AL0006 site located in Brewton, Alabama. Corrective action activities at the site are being conducted by Three Notch Group, Inc. (Three Notch) under the Alabama Tank Trust Fund (ATTF).

Air emissions will be produced during the operation and maintenance of a proposed multi-phase extraction (MPE) system. Free product has been observed at the site since February 2024. Free product levels were measured in four of the monitoring wells during the last groundwater monitoring event conducted on July 7, 2025: MW-3 (0.32 ft), MW-4 (4.63 ft), MW-14 (0.38 ft), and RW-1 (6.69 ft).

The proposed air control device for the MPE system will consist of a 300 SCFM capacity or equal electric oxidizer unit. The oxidizer will be used until free product is no longer present. At that time, Three Notch would likely recommend that granular activated carbon (GAC) be used for the air emission control.

Air samples (prior to off-gas treatment) will be collected on a quarterly basis. The samples will be analyzed for BTEX constituents using a modified EPA Method TO-3. Air emission control will be utilized until the free product is removed and the Volatile Organic Compound (VOC) emissions do not exceed 0.1 pound per hour (lbs/hr), unless Air Modeling indicates otherwise.

Attached is the ADEM Form 448. Please note that there are a number of assumptions in the air calculations for emissions. Off-gas loading estimates were determined using data from multiple Mobile Enhanced Multi-phase Extraction (MEME) events conducted at the site. Based on Three Notch's experience with conducting remediation at similar locations, the rate of off-gas loading will decrease rapidly as soil and groundwater concentrations are reduced throughout the remediation process. Once the off-gas loading concentrations decrease below threshold values, Three Notch may request that the use of the MPE system be discontinued.

The proposed system will use a total of eight recovery wells. The most recent groundwater sampling event was conducted on July 7, 2025, and the groundwater analytical data from the event is included in the attached tables.

The most recent 8-hr MEME event was conducted on August 1, 2025, by Three Notch. During the 8-hr event, approximately 124.06 pounds of hydrocarbons (20.14 equivalent gallons of gasoline) were recovered at an applied vacuum of 5.5-in Hg and an average influent flow rate of approximately 287.7 SCFM.

If you have any questions, or if you need any additional information, please do not hesitate to contact me at (334)222-9431.

Respectively,

Three Notch Group



Anna Brunson
Project Manager

REMEDATION APPROVAL

This form should be submitted to the Department to obtain Air Division approval prior to operating any type of remediation system. Depending on the type of remediation system being proposed, some of the following questions may not apply:

TYPE REMEDIATION SYSTEM: (Check One)

- ☐ Soil-Vapor Extraction (SVE) – soil only remediation
- ☐ Pump & Treat (PT) – groundwater only remediation
- ☒ Multi-Phase Vapor Extraction (MPVE) – soil & groundwater remediation
- ___ SVE (w/PT) ___ SVE (w/Air Sparging) ☒ Dual-Phase
- ☐ Mobile Enhanced Multi-Phase Extraction (MEME) – a short term remediation of soils and/or groundwater.

Is Free Product Present?

☒ Yes ☐ No

Is This a Pilot Study?

☐ Yes ☒ No

OWNER: Name LGWS/CrossAmerica Partners Phone No.: (850) 832-1424

Mailing Address 600 Hamilton Street, Suite 500

City Allentown State PA Zip 18101

SITE: Facility Name: AL0006

Facility Address: 2277 Douglas Avenue

Location: (City) Brewton (County) Escambia

Facility ID No.: 25265 - 053 - 018577 UST Incident No.: 24 - 12 - 05

CONTAMINANTS: On a separate page please list all contaminants along with the most recent sample data from all wells: groundwater and/or soil.

CALCULATIONS: Utilize the highest, most recent concentrations (not historical highs or averages) for each contaminant, the highest anticipated flow rate and it should be expressed in lbs/hr.

Groundwater Calculations:

Concentration (mg/L) X flow (gal/min) X Conversion (5.01×10^{-4}) = emissions (lbs/hr)

***Soil Calculations:**

Concentration (mg/m³) X flow (m³/min) X Conversion (1.32×10^{-4}) = emissions (lbs/hr)

**Please note that most soil sample concentrations are expressed in mg/kg and must be converted to mg/m³ prior to using the above formula.*

REMEDIATION SYSTEM: Please provide a brief description along with a flow diagram of the remediation system. The information should include but not be limited to the following: maximum blower speed (ft³/min) and maximum groundwater recovery rate (gal/min) of the liquid ring pump(s).

Proposed date of implementation: January 2026

Anticipated groundwater recovery rate: 5 gal/min

Anticipated soil vapor extraction rate: 500 ft³/min

Dry soil bulk density: 1.74 g/cm³

Proposed Air Pollution Control Device (APCD) if system does not pass modeling:

Please include the following information for all sites (excluding MEME events):

Distances (ft) from emission point to fence: N: 6 S: 6 E: 6 W: 6
(Note: distance should reflect accessibility by the public, not necessarily property lines)

Emission Points- Should reflect the stack parameters without a APCD

From the Blower

Stack 1: Height above ground 15 ft Inside diameter 0.5 ft
Exit Velocity 31.8 ft/s Exit Temperature 120 °F

From the Air Stripper

Stack 2: Height above ground 15 ft Inside diameter 0.5 ft
Exit Velocity 75 ft/s Exit Temperature 80 °F

ADEM Project Manager: Tyler Sims

Subcontractor: Three Notch Group, Inc.

Consultant Project Manager: Anna Brunson

Consulting Firm: Three Notch Group, Inc.

Mailing Address: P.O. Box 278

City Andalusia State AL Zip 36421

Consultant E-mail address (optional): anna.brunson@3notch.com

Consultant Phone No.: (334) 222-9431

Consultant Signature: Anna Brunson Date: 08/25/25

Air Emission Calculation

AL0006

2277 Douglas Avenue

Brewton, Escambia County, Alabama

	Soil			Groundwater	
	Max Conc.	Max Conc.	Emmission*	Max Conc.	Emmission
	mg/kg	mg/m ³	lbs/ hr	mg/L	lbs/ hr
MTBE	0.005	0.0045	0.000	0.25	0.00125
Benzene	0.006	1.58	0.003	21.2	0.10621
Toluene	0.045	59.8	0.110	150	0.75150
Ethylbenzene	0.140	34.7	0.064	15.3	0.07665
Xylenes	1.080	206	0.377	77.9	0.39028
Naphthalene	0.386	2.09	0.004	1.59	0.00797

Vapor Recovery Rate:	490 ft ³ /min	13.877 m ³ / min
Groundwater Recovery Rate:	5 gal/ min	
Soil Bulk Density:	1.74 g/cm ³	1,744 kg/m ³

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-1		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	25.5	SCREEN LENGTH (FT):	10	CASING ELEV (FT ABOVE MSL):	184.60	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-2		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	25.5	SCREEN LENGTH (FT):	10	CASING ELEV (FT ABOVE MSL):	184.90	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-3		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	30.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	184.20	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-3	02/20/24	20-25	<0.007	<0.007	<0.038	<0.007	<0.007	BDL	<0.038
MW-3	02/20/24	25-30	<0.009	<0.009	0.0490	0.0090	0.0570	0.115	<0.045
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-3		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	30.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	184.20	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-4		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	30.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.00	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-4	02/20/24	20-25	<0.009	1.58	32.7	19.8	108	162.080	1.23
MW-4	02/20/24	25-30	<0.008	0.201	6.26	3.34	25.9	35.701	2.09
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-4		
INSTALLATION DATE:	02/20/24	WELL DEPTH (FT BTOC):	30.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.00	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-5		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	39.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	184.86	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-5	05/20/24	5-10	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
MW-5	05/20/24	10-15	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-5		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	39.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	184.86	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table									
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SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-6		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.19	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

SOIL ANALYTICAL SUMMARY (mg/Kg)	
As	0.05
Cd	0.01
Cr	0.10
Pb	0.02
Hg	0.005
Mn	0.50
Mo	0.01
Ni	0.05
Se	0.005
Sn	0.01
Co	0.01
Fe	1.50
Al	1.50
Cu	0.05
Zn	0.50
B	0.01
S	0.01
Ca	0.01
Mg	0.01
K	0.01
Na	0.01
Cl	0.01
F	0.01
I	0.01
Br	0.01
Li	0.01
Rb	0.01
Sr	0.01
Y	0.01
Zr	0.01
Nb	0.01
Mo	0.01
Ta	0.01
W	0.01
Re	0.01
Os	0.01
Ir	0.01
Pt	0.01
Au	0.01
Ag	0.01
Cd	0.01
Hg	0.01
Pb	0.01
As	0.01
Cr	0.01
Cu	0.01
Zn	0.01
Fe	0.01
Al	0.01
Ca	0.01
Mg	0.01
K	0.01
Na	0.01
Cl	0.01
F	0.01
I	0.01
Br	0.01
Li	0.01
Rb	0.01
Sr	0.01
Y	0.01
Zr	0.01
Nb	0.01
Mo	0.01
Ta	0.01
W	0.01
Re	0.01
Os	0.01
Ir	0.01
Pt	0.01
Au	0.01
Ag	0.01
Cd	0.01
Hg	0.01
Pb	0.01
As	0.01
Cr	0.01
Cu	0.01
Zn	0.01
Fe	0.01
Al	0.01
Ca	0.01
Mg	0.01
K	0.01
Na	0.01
Cl	0.01
F	0.01
I	0.01
Br	0.01
Li	0.01
Rb	0.01
Sr	0.01
Y	0.01
Zr	0.01
Nb	0.01
Mo	0.01
Ta	0.01
W	0.01
Re	0.01
Os	0.01
Ir	0.01
Pt	0.01
Au	0.01
Ag	0.01
Cd	0.01
Hg	0.01
Pb	0.01
As	0.01
Cr	0.01
Cu	0.01
Zn	0.01
Fe	0.01
Al	0.01
Ca	0.01
Mg	0.01
K	0.01
Na	0.01
Cl	0.01
F	0.01
I	0.01
Br	0.01
Li	0.01
Rb	0.01
Sr	0.01
Y	0.01
Zr	0.01
Nb	0.01
Mo	0.01
Ta	0.01
W	0.01
Re	0.01
Os	0.01
Ir	0.01
Pt	0.01
Au	0.01
Ag	0.01
Cd	0.01
Hg	0.01
Pb	0.01
As	0.01
Cr	0.01
Cu	0.01
Zn	0.01
Fe	0.01
Al	0.01
Ca	0.01
Mg	0.01
K	0.01
Na	0.01
Cl	0.01
F	0.01
I	0.01
Br	0.01
Li	0.01
Rb	0.01
Sr	0.01
Y	0.01
Zr	0.01
Nb	0.01
Mo	0.01
Ta	0.01
W	0.01
Re	0.01
Os	0.01
Ir	0.01
Pt	0.01
Au	0.01
Ag	0.01
Cd	0.01
Hg	0

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-6	05/20/24	20-25	<0.002	0.064	0.082	0.014	0.061	0.221	<0.010
MW-6	05/20/24	25-30	<0.002	0.006	<0.010	<0.002	0.004	0.010	<0.010
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-7		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	38.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	183.35	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-7	05/20/24	20-25	<0.002	0.035	0.377	0.164	0.890	1.466	0.025
MW-7	05/20/24	25-30	<0.002	0.015	0.014	0.011	0.066	0.106	<0.010
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-8		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	39.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	178.75	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-8	05/20/24	15-20	<0.002	<0.002	<0.010	<0.002	0.009	0.009	<0.010
MW-8	05/20/24	20-25	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
SSTLs:			87.6	0.0763	8.83	32.6	13.1	-	11.7

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-8		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	39.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	178.75	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-9		
INSTALLATION DATE:	05/20/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	181.89	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-10		
INSTALLATION DATE:	05/22/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.06	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-10	05/22/24	15-20	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
MW-10	05/22/24	25-30	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-10		
INSTALLATION DATE:	05/22/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.06	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-11		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	185.95	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-12		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	39.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	182.75	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-13		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	40.5	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	182.84	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-14		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	15	CASING ELEV (FT ABOVE MSL):	181.73	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-15		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	180.34	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-15	08/13/24	10-20	<0.009	<0.009	<0.046	<0.009	<0.009	BDL	<0.046
MW-15	08/13/24	20-30	<0.009	<0.009	<0.048	<0.009	<0.009	BDL	<0.048
SSTLs:			87.6	0.0763	8.83	32.6	13.1	-	11.7

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-15		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	180.34	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-16		
INSTALLATION DATE:	08/15/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	181.11	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-16	08/15/24	10-20	<0.008	<0.008	<0.044	<0.008	<0.008	BDL	<0.044
MW-16	08/15/24	20-30	<0.010	<0.010	<0.050	<0.010	<0.010	BDL	<0.050
SSTLs:			87.6	0.0763	8.83	32.6	13.1	-	11.7

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-16		
INSTALLATION DATE:	08/15/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	181.11	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-17		
INSTALLATION DATE:	08/15/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	181.04	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-18		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.72	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-18	08/13/24	10-20	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
MW-18	08/13/24	20-30	<0.002	<0.002	<0.010	<0.002	<0.002	BDL	<0.010
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-18		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.72	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-19		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.76	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
MW-19	08/12/24	10-20	<0.008	<0.008	<0.043	<0.008	<0.008	BDL	<0.043
MW-19	08/12/24	20-30	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-19		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.76	WELL TYPE: DIAMETER (IN):	II 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-20		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.54	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	MW-21		
INSTALLATION DATE:	08/12/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.52	WELL TYPE: DIAMETER (IN):	II 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	VW-1		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	47.5	SCREEN LENGTH (FT):	5	CASING ELEV (FT ABOVE MSL):	184.47	WELL TYPE: DIAMETER (IN):	III 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
VW-1	05/21/24	15-20	<0.007	1.32	59.8	34.5	130	225.620	1.49
VW-1	05/21/24	25-30	<0.002	0.281	<0.400	0.287	0.313	0.881	0.04
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	VW-1		
INSTALLATION DATE:	05/21/24	WELL DEPTH (FT BTOC):	47.5	SCREEN LENGTH (FT):	5	CASING ELEV (FT ABOVE MSL):	184.47	WELL TYPE: DIAMETER (IN):	III 2
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	VW-2		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	50.0	SCREEN LENGTH (FT):	5	CASING ELEV (FT ABOVE MSL):	185.40	WELL TYPE: DIAMETER (IN):	III 2

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-1		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	185.63	WELL TYPE: DIAMETER (IN):	II 4

Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-2		
INSTALLATION DATE:	08/14/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	184.47	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-3		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	183.63	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
RW-3	08/13/24	10-20	<0.008	<0.008	<0.043	<0.008	<0.008	BDL	<0.043
RW-3	08/13/24	20-30	<0.008	0.054	0.195	0.032	0.182	0.463	<0.042
SSTLs:			941	0.5	94.9	350	141	-	125

POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-3		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	183.63	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-4		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	183.89	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-5		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	184.88	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

SOIL ANALYTICAL SUMMARY (mg/Kg)

SAMPLE ID	SAMPLE DATE	DEPTH (FT)	MTBE	BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	TOTAL BTEX	NAPHTHALENE
RW-5	08/13/24	10-20	<0.009	<0.009	<0.047	<0.009	<0.009	BDL	<0.047
RW-5	08/13/24	20-30	<0.009	<0.009	<0.045	<0.009	<0.009	BDL	<0.045

SSTLs:	941	0.5	94.9	350	141	-	125
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POTENTIOMETRIC ELEVATION SUMMARY

[illegible]

INTRINSIC GROUNDWATER DATA SUMMARY

[illegible]

Monitoring Point Data Summary Table

SITE NAME:	AL0006			UST NUMBER:	24-12-05	WELL ID:	RW-5		
INSTALLATION DATE:	08/13/24	WELL DEPTH (FT BTOC):	40.0	SCREEN LENGTH (FT):	20	CASING ELEV (FT ABOVE MSL):	184.88	WELL TYPE: DIAMETER (IN):	II 4
Notes: BTOC (Below Top of Casing); MSL (Mean Sea Level); BDL (Below Detection Limit); CA (Corrective Action)									

[illegible]

NPDES PERMIT APPLICATION

Table of Contents

Table of Contents	1
Notice of Intent - NPDES General Permit - Petroleum Products and Treated Groundwater (ALG340000) (Form 394)	2
(Submission #: HQF-4TG5-1DP0W, version 1)	2
Details	2
Fees	2
Form Input	2
General Instructions	2
Processing Information	2
Industrial Activity Information	2
Permittee Information	2
DMR Contact(s) (1 of 1)	3
Facility/Site Information	4
Best Management Practices (BMP) Plan	5
DSN001: Storm water and/or groundwater discharges associated with the remediation of groundwater and/or soil contaminated with petroleum or its derivatives (1 of 1)	6
Outfall: 0011	6
DSN001: Related Information	6
NOI Preparer	7
Inspection Status	7
Status History	7
Agreements and Signature(s)	8

Notice of Intent - NPDES General Permit - Petroleum Products and Treated Groundwater (ALG340000) (Form 394)

version 2.9

(Submission #: HQF-4TG5-1DP0W, version 1)

Details

Submission ID HQF-4TG5-1DP0W

Status In Process

Fees

Default Fee \$1,385.00

Payments/Adjustments (\$1,385.00)

Balance Due \$0.00 (Paid)

Form Input

General Instructions

Processing Information

Form Submission Reason

New

Are you applying for a modification or reissuance of an EXISTING permit coverage under General Permit Number ALG340000?

No

Industrial Activity Information

Check the type of discharge at your facility and complete the applicable sections associated with the type checked:

Storm water and/or groundwater discharges associated with the remediation of groundwater and/or soil contaminated with petroleum or its derivatives (DSN001)

Are any discharges above combined?

No

Does any discharge or runoff from the facility reach an Outstanding Alabama Water or Outstanding Natural Resource Water stream segment as defined by ADEM Administrative Code r. 335-6-11-.02?

No

Description of industrial activity and land use at the facility:

Gasoline station

Permittee Information

Permittee**Permittee Name (Legal Business Name)**

Three Notch Group, Inc.

Mailing Address

P.O. Box 278

Andalusia, AL 36420

United States

To look up your company's legal business name, please refer to the Secretary of State's website:

[Click here](#)

Responsible Official**Prefix**

Mr.

First Name

Robert

Last Name

Shepard

Title

Vice President

Organization Name

Three Notch Group, Inc.

Phone Type**Number****Extension**

Business

3342229431

Email

robert.shepard@3notch.com

Fax

NONE PROVIDED

Mailing Address

P.O. Box 278

Andalusia, AL 36420

United States

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

No

DMR Contact(s) (1 of 1)

DMR Contact

Prefix

Mrs.

First Name

Anna

Last Name

Brunson

Title

Project Manager

Organization Name

Three Notch Group, Inc.

Phone Type**Number****Extension**

Business

3342229431

Email

anna.brunson@3notch.com

Address

P.O. Box 278

Andalusia, AL 36420

United States

Facility/Site Information

Facility/Site Name

AL0006

Permittee Organization Type

Corporation

Facility/Site Contact

Prefix

Mrs.

First Name

Anna

Last Name

Brunson

Title

Project Manager

Organization Name

Three Notch Group, Inc.

Phone Type**Number****Extension**

Business

3342229431

Email

anna.brunson@3notch.com

Address

P.O. Box 278

Andalusia, AL 36420

Facility/Site Address or Location Description

2277 DOUGLAS AVE

BREWTON, AL 36426-3545

Facility/Site County

Escambia

Detailed Directions to the Facility/Site

Intersection of Hwy 31 and Lovelace Lane

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

Facility/Site Front Gate Latitude and Longitude

31.14316568673335,-87.06878694841005

SIC Code(s) [Please select your primary SIC code first]:

5541-Gasoline Service Stations

NAICS Code(s) [Please select your primary NAICS code first]:

457110-Gasoline Stations With Convenience Stores

Has the facility been issued an NPDES INDIVIDUAL permit?

No

Has the facility been issued a State Indirect Discharge (SID) Permit?

No

Has the facility ever been issued coverage under an NPDES GENERAL Permit other than the permit listed on this application?

No

Are any discharges that you intend to be covered by this general permit going to municipal storm sewer?

Yes

Name of the surface water to which the municipal storm sewer discharges:

King Branch

Have you notified the municipality by letter as required by 40 CFR 122.26(a)(4)?

Yes

Date facility started or will start operations:

01/01/2026

What is the size of the site in acres?

1

Do you discharge to any waters of the State that are impaired (303(d) or TMDL)?

No

Does any discharge or runoff from the facility reach a public water supply stream segment as defined by ADEM Administrative Code r. 335-6-11-.02?

No

Please indicate which of the following control measures the facility has to prevent pollution. Check all that apply or select ☒ None ☒.

Treatment of groundwater (retention, aeration)

Do you have additional contacts associated with this site?

No

Best Management Practices (BMP) Plan

Note

This permit requires the development and implementation of a Best Management Practices (BMP) Plan. The BMP Plan shall be prepared and fully implemented no later than the date coverage is granted. This includes the generation and retention of inspection and training records.

Please confirm the status of the BMP plan:

I confirm that the BMP plan has already been developed and will be implemented no later than the date the industrial activity requiring coverage commences.

Provide the date the BMP plan was finalized.

08/28/2025

Attach BMP Plan (optional)

NONE PROVIDED

Comment

NONE PROVIDED

DSN001: Storm water and/or groundwater discharges associated with the remediation of groundwater and/or soil contaminated with petroleum or its derivatives (1 of 1)

Outfall: 0011

Feature Type

DSN001

Outfall Identifier

0011

Receiving Stream

King Branch

Does the discharge enter the named receiving water via an unnamed tributary and/or a storm sewer system? Please also indicate if the storm sewer system is under an MS4 permit.

Via Storm Sewer

[For help on how to place a point on the map, click here.](#)

Location of the Point Where Each Discharge Exits the Property

31.143285060087226,-87.0687413508568

DSN001: Related Information

Have the groundwater discharges and/or storm water runoff from the facility been analyzed for presence of any known pollutants?

No

Has groundwater from this site been tested for the presence of Lead?

No

Are there any known impacts on the receiving water as a result of any discharges under DSN001?

No

List the outfalls under DSN001 that are treated groundwater:

DSN001

Will there be any discharge of groundwater as a result of aquifer testing?

No

Does the facility plan to discharge well purge waters?

No

Does the facility plan to discharge storm water accumulated in UST tank pits during closure?

No

Were there any past industrial activities on the site that would contribute to storm water contamination?

No

Did the facility ever handle leaded fuels?

No

Did the facility ever handle aviation fuel, jet fuel, or diesel fuel?

Yes

Did the contamination result from the handling of aviation fuel, jet fuel, or diesel fuel?
No

Will the facility stockpile contaminated material on site?
No

NOI Preparer

NOI Preparer

Prefix

Mrs.

First Name

Anna

Last Name

Brunson

Title

Project Manager

Organization Name

Three Notch Group, Inc.

Phone Type

Business

Number

3342229431

Extension

Email

anna.brunson@3notch.com

Address

PO BOX 278

ANDALUSIA, AL 36420-1205

United States

Inspection Status

Was this facility/site inspected and found to be in operation (conducting industrial activities) prior to effective Industrial NPDES Permit coverage?
No

Status History

	User	Processing Status
8/26/2025 2:09:13 PM	Anna Brunson	Draft
8/26/2025 2:27:20 PM	Anna Brunson	Signing
8/26/2025 2:30:51 PM	Anna Brunson	Draft
8/26/2025 2:31:45 PM	Anna Brunson	Signing
8/26/2025 2:32:57 PM	Robert Shepard	Payment Due
8/26/2025 3:37:54 PM	Robert Shepard	Submitting
8/26/2025 3:38:03 PM	Robert Shepard	Submitted
8/26/2025 3:38:13 PM	Robert Shepard	In Process

Agreements and Signature(s)

SUBMISSION AGREEMENTS

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

I certify under penalty of 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 or imprisonment for knowing violations.

Signed Robert Shepard on 08/26/2025 at 2:32 PM
By



AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama

Brewton North Quadrangle
Township 2 North; Range 10 East; Section 16
LAT: 31.143056 LONG: -87.068858



QUALITY ASSURANCE/ QUALITY CONTROL PLAN

QA/QC MONITORING/SAMPLING PLAN

FIELD ACTIVITIES

Air Sampling

Air samples are collected utilizing an air sampling pump system or Summa canister. The pump is primed, prior to collection of each sample, to displace any trapped air or gases with the targeted air make-up. The air is drawn in and exits through polyethylene tubing. The sample is collected directly into and stored in a Tedlar air/gas sampling bag or Summa canister. The sample bag or canister is provided to Three Notch Group, Inc. (Three Notch) by the analytical laboratory. The air sampling pump system is also used to extract air/gases from a vacuum and drive them into a field-screening instrument. The air sample collection and screening protocols are described below.

Air Screening

Air screening is conducted to provide a field indication of the levels of hydrocarbon gases in vapor phase. The air/gases are screened with an organic vapor analyzer, equipped with a methane filter (as applicable). The field instrument is field calibrated to a gas standard of known concentration. Field air/gas samples are screened at ambient conditions and the data recorded. The field screening test form contains the following information:

- Project name (client and location);
- Data table number;
- Personnel collecting samples;
- Field screening instrument used and I.D. number;
- Calibration information;
- Description of field screening method;
- Sample identification information; and
- Screening data, including time collected/screened, ambient temperature/results.

Air Sampling Protocols

Air samples designated for laboratory analysis are collected in Tedlar bags or a Summa canister. The sample bags or canister are provided to Three Notch directly by the analytical laboratory. If Tedlar bags are used, two Tedlar bags are filled for each sample, in the event the bags are damaged during shipment. Upon collection, each sample bag is immediately placed in a cooler or other secure shipping container, following laboratory instructions and

appropriate chain of custody documentation. The samples are sent direct to the laboratory via overnight carrier or are picked up from the Three Notch office by a representative of the laboratory.

Groundwater Monitoring/Sampling Activity Protocols

Groundwater monitoring/sampling includes the following associated activities:

- 1) Measurement for the presence of free product;
- 2) Measurement of static water level;
- 3) Calculation of standing water volume (in well);
- 4) Sample collection; and
- 5) Equipment decontamination.

Groundwater sampling parameters are recorded in the field on a monitor well sampling record form. The details for each of the above referenced monitoring/sampling activities are described in the following sections.

Free Product Detection and Measurement

The presence of free product is measured prior to free product recovery and purging/sampling the selected monitor well. Free product is detected/measured using a hydrocarbon/water interface probe. The probe is lowered slowly into the well until an instrument tone is heard (a constant tone indicates that free product is present, and an intermittent tone indicates that water is present). The point at which a constant tone is first heard is considered the top of free product. The measurement from the top of the PVC well casing to the top of free product is recorded. The measurement is checked at least twice. The probe is then slowly lowered further into the well until an intermittent tone is heard (indicating that the probe has passed through the free product layer into the underlying groundwater interval). Once the intermittent tone is encountered, the probe is slowly raised until the constant tone is again indicated. This point is considered the interface between the floating free product layer and the groundwater table. The measurement from the top of the PVC casing to the interface is recorded. This measurement is also checked at least twice.

The free product thickness is determined by calculating the difference between the measurement to the top of free product and the measurement to the free product/water interface (the interface probe measures free product and water levels to an accuracy of 0.01 feet). If free product is identified by the interface probe, a clear bailer is lowered into the

well to collect a sample for visual confirmation of the free product. Remarks regarding visual characteristics of the free product are recorded (black, clear, colored, etc.).

Calculation of Standing Water Volume

The standing water volume in a monitor well is calculated using the equation:

$v = 3.14 \times r^2 \times l$ (where v = well volume, r = well radius, and l = length of the column of water in the well).

The column of water in the well can be calculated using the equation:

$l = w - d$ (where w = distance from the top of casing to the bottom of the well and d = distance from the top of casing to the top of the water).

Well Evacuation

Well evacuation is initiated after the static water level is measured and the standing water volume has been calculated. Well evacuation is conducted by either using a new disposable (single-use) bailer, a well-dedicated PVC bailer, or a surface mounted pneumatic operated diaphragm pump (a diaphragm pump is only used in deep wells (greater than 25 feet) or in wells that yield such large volumes that hand-bailing is not practical).

Well evacuation with a bailer is performed by attaching a new nylon line to the bailer, and then lowering the bailer into the well until the bailer is submerged. The bailer is then retrieved from the well in such a manner that the bailer and nylon line do not contact the ground or surrounding vegetation (to prevent contaminating the bailer or line). The water removed from the well is poured into a graduated bucket so that the amount of water removed can be determined. This procedure is repeated until three well volumes of water are removed, or until the well is purged dry. For wells that recharge very slowly, the purge water is limited to one well volume. The volume of groundwater purged from each well will be recorded.

Well evacuation with a diaphragm pump is conducted by lowering disposable tubing (hose) into the well, to sufficient depth. For deeper wells, a PVC pipe, equipped with a foot valve (to stage-lift the water out of the well) will be employed. The piping will be well-

dedicated to prevent cross-contamination. Pumping will be performed until at least three well volumes are recovered (purge volume will be recorded).

Petroleum contaminated water (PCW) purged from wells in conjunction with groundwater monitoring/sampling activities will be processed and treated through a portable carbon unit prior to being released onsite. Any PCW with free product or strong odors will be containerized and transported to the Three Notch facility where it will be disposed of at an approved facility.

Groundwater Sample Collection

Groundwater samples are collected from monitor wells not containing free product, unless otherwise directed by the ADEM. Groundwater sampling is performed using a new disposable bailer for each sampled well. The disposable bailers are purchased in individually wrapped packages and are not opened until ready to use. Once opened, the bailers are attached to a length of new nylon string. The bailer and string are not allowed to touch the ground or vegetation and are disposed of after each well. Sampling is accomplished by slowly lowering the bailer into the well to a depth where the bailer is almost completely submerged. The bailer is then slowly retrieved from the well to minimize agitation of the sample. Once collected, the water sample is immediately transferred (poured slowly to minimize agitation and formation of air bubbles) into the designated sample containers.

Groundwater samples collected for volatile organics, including Benzene, Toluene, Ethylbenzene, Total Xylenes, Methyl-tert-butyl-ether, and Naphthalene (BTEX/MTBE/Naph) analysis are transferred very slowly down the inside of the sample vial to avoid aeration. The sample vials, consisting of 40 mL glass with a Teflon septum cap, are shipped to Three Notch directly from the analytical laboratory. The groundwater sample is added to the vial until a convex meniscus is formed across the top of the vial. The Teflon septum cap is placed on the vial and the vial is upended to check for trapped air bubbles. If bubbles are present, the sample container is opened, and topped off again until an air-free sample is obtained. If the vial cannot be closed "air-free" after three tries, it is discarded. Two samples are collected for each BTEX/MTBE/Naph (volatile) analysis. The preservation employed for BTEX/MTBE/Naph (volatile) analysis will include either of the following (depending on holding time constraints):

- Cool collected sample to 4°C and maintain (7 day holding time), or
- Add 4 drops concentrated HCl to sample vial (typically the acid is pre-added by the laboratory to the sample vial) and then cool sample to 4°C and maintain (14 day holding time).

Immediately following collection of each groundwater sample, the sample is labeled, placed in bubble pack (to prevent the glass vial from breaking during shipping), and stored in a well-iced ice chest. Each sample label includes the site location, sample identification number, name of collector, date/time of collection, and parameter(s) requested.

Following collection of all samples, the iced chest will be sealed and transported to the laboratory following appropriate chain of custody protocols (refer to description of Chain of Custody protocols provided below).

Decontamination of Groundwater Sampling Equipment

All equipment used for groundwater sampling is either well-dedicated or is used only once and disposed of. As a result, cleaning/decontamination of sampling equipment is minimal.

QA/QC PROCEDURES DISCUSSION

Chain of Custody

Sample custody begins with the subcontracted laboratory when sample kits are prepared and shipped for Three Notch use at a specified project location. Responsibility for sample container materials and preparation lies with the subcontracted laboratory. Sample containers and kits are normally shipped to Three Notch by common carrier or are dropped off by a laboratory representative. Upon receipt of the kits, Three Notch personnel complete an inventory of the contents to confirm that the containers, etc. are adequate for the number of wells and specified analytes. Sample bottles may be pre-labeled and contain the proper preservative. The individual sample vials and/or other sample containers are not opened until used in the field. Three Notch will secure the sample kits inside the office until the specific sampling project is to be performed.

The samples remain in the custody of the Three Notch representative until delivered to the subcontract laboratory or dispatched via common carrier for shipment to the laboratory. In cases where samples leave the direct control of Three Notch personnel, such as shipment

to a laboratory by a common carrier (FedEx, UPS, etc.), a seal will be provided on the shipping container or individual sample bottles to ensure that the samples have not been opened or otherwise disturbed during transportation.

To establish and maintain the documentation necessary to trace sample possession from the time of collection, a chain of custody record will be completed and will accompany every sample. The record contains the following types of information:

- Sample number
- Signature of collector
- Date and time of collection
- Sample type (soil, groundwater, air, etc.)
- Identification of well
- Number of containers
- Parameters requested for analysis
- Required detection limit
- Signature of person(s) involved in the chain of possession.

Field QA/QC Program

Various types of field blanks are collected to verify that the sample collection and handling process has not affected the quality or integrity of the samples.

- 1) Trip Blanks – A trip blank is a field blank that is transported from the laboratory to the sampling site, handled in the same manner as other samples, and then returned to the laboratory for analysis in determining QA/QC of sample handling procedures. The trip blank is prepared in the laboratory with distilled/organic free water and is utilized at a frequency of 1 trip blank for each cooler (or other shipping container) used to transport samples from the laboratory to the field and back to the laboratory.
- 2) Duplicate Sample – Duplicate samples are collected simultaneously from the same source, under identical conditions, into separate sample containers. These samples provide a check on the sampling techniques as well as laboratory equipment. Duplicate samples are only collected on groundwater samples at a frequency of one sample per sampling event.

The results of the analysis of the blanks will not be used to correct the groundwater data. If contaminants are found in the blanks, an attempt to identify the source of contamination will be initiated and corrective action, including re-sampling if necessary, will be evaluated.

After completing a sampling program, the field data package (field logs, calibration records, chain of custody forms, etc.) will be reviewed for completeness and accuracy. Some of the items considered in the Field Data Package Validation Procedure include but are not limited to the following:

- A completeness review of field data contained on water and soil sampling logs;
- A verification that sampler blanks were properly prepared, identified, and analyzed;
- A check on field analyses for equipment calibration and condition; and
- A review of chain of custody forms for proper completion, signatures of field personnel and the laboratory sample custodian, and dates.

Laboratory QA/QC Program

The selection of a contract laboratory can be directed either by the client or by Three Notch. In either case, the selection is typically based upon several facts, including cost; laboratory certification; quality data and reporting; and turn around time. The most critical factor in the selection of an analytical laboratory by Three Notch is the quality of data and reporting provided by the laboratory. Typically, the results of analytical laboratory testing dictate the activities conducted at a site. The activities conducted when selecting a laboratory include discussions with current and past customers, discussions with regulators, and review of laboratory QA/QC practices.

The normal turn around for samples will be two weeks for most samples. Prior to contracting a laboratory to conduct analysis, an estimate of the turn around time is obtained. If the expected turn around is in excess of three weeks, then a backup laboratory is contacted to determine their availability. A decision of which laboratory to use in a particular instance is made on a case-by-case basis.

Once an analytical report is received by Three Notch, validation of the analytical data package will be performed. The Analytical Data Package Validation procedure will include but is not limited to the following:

- A comparison of the Data Package to the reporting level requirements designed for the project, to ensure completeness;
- A comparison of sampling dates, sample extraction dates, and analysis dates to determine if samples were extracted and/or analyzed within the proper holding times' as failure in this area may render the data unusable;
- A review of analytical methods and required detection limits to verify that they agree with set standards; as failure in this area may render the data unusable;
- A review of sample blanks to evaluate possible sources of contamination. The preparation techniques and frequencies, and the analytical results (if appropriate) will be considered; and
- A review of blanks (trip blanks, reagent blanks, method blanks, and extraction blanks) to assure that they are contamination free at the lowest possible detection limit. All blank contaminants must be explained or the data applicable to those blanks will be labeled suspect and may only be sufficient for qualitative purposes.
- A review of detection limits, to ensure sample results are accurate to below the levels specified as ADEM Initial Screening Levels.
- A review of data "qualifiers" reported by the laboratory for significance to the results.

SITE HEALTH AND SAFETY PLAN

Site Health and Safety Plan

**AL0006
2277 Douglas Avenue
Brewton, Escambia County, Alabama
Facility ID No. 25265-053-018577
UST No. 24-12-05**

Prepared For:
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Prepared By:
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Table of Contents

	Page No.
1.0 Introduction.....	1
2.0 Purpose.....	1
3.0 Key Personnel and Responsibilities.....	1
4.0 Scope of Work	2
4.1 Installation Activities	2
4.2 Operation & Maintenance Activities	2
5.0 Chemical Hazards.....	3
5.1 Gasoline and Diesel.....	3
5.2 Hazard Identification.....	3
5.3 Hazard Prevention.....	4
5.4 Symptoms and First Aid Procedures.....	4
6.0 Equipment/Operational Hazards.....	5
6.1 Hazard Identification.....	5
6.2 Hazard Prevention.....	6
6.3 Symptoms and First Aid Procedure.....	6
7.0 Temperature Hazards.....	7
7.1 Heat.....	7
7.1.1 Hazard Identification.....	7
7.1.1.1 Heat Fatigue	7
7.1.1.2 Heat Rash.	8
7.1.1.3 Heat Collapse	8
7.1.1.4 Heat Cramps.....	8
7.1.1.5 Heat Exhaustion	8
7.1.1.6 Heat Stroke.....	9
7.1.2 Hazard Prevention.....	9
7.1.3 Symptoms and First Aid Procedures	9
8.0 Explosion/Electrocution Hazards	10
8.1 Explosion.....	11
8.1.1 Hazard Identification.....	11
8.1.2 Hazard Prevention.....	11
8.2 Electrocution	12
8.2.1 Hazard Identification.....	12
8.2.2 Hazard Prevention.....	12
8.2.3 Symptoms and First Aid Procedures.....	12

9.0	Miscellaneous Hazards.....	13
9.1	Hazard Identification	13
9.2	Hazard Prevention	13
9.3	Symptoms and First Aid Procedures	13
10.0	Additional Precautions	14
10.1	Personal Protective Equipment.....	14
10.2	Signs, Signals, and Barricades.....	15
10.3	Fire Protection and Prevention	15
10.4	Storage and Decontamination.....	16
11.0	Emergency Contingency Plan.....	16
11.1	Notification/Reporting Procedures	16
11.2	Hazardous Substance Release	16
11.3	Personnel Injury	17
11.4	Evacuation Plan.....	17
11.5	Spill Prevention and Response	17
11.6	Emergency Communication.....	17
11.7	Contingency Contacts.....	18
11.8	Medical Facility.....	18

1.0 Introduction

This Health and Safety Plan (HASP) has been prepared specifically for corrective action activities to be conducted by Three Notch Group, Inc. (Three Notch) for the AL0006 facility located in Brewton, Escambia County, Alabama. These activities include all fieldwork necessary to conduct soil and groundwater remediation of petroleum hydrocarbons at the site.

2.0 Purpose

This HASP describes the preventative measures, person protection, and safety procedures to be followed by Three Notch personnel and subcontractors during all field activities. The HASP has been prepared in accordance with and meets the requirements of the Occupation Safety and Health Administration (OSHA) General Safety Standards for industry under 29 CFR 1910 and construction under 29 CFR 1926, the joint NIOSH/OSHA/USCG/EPA, *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities*, dated October 1985, and NFPA Safety Guidelines. Should any unexpected conditions arise, the HASP will be amended to accommodate site specific conditions.

3.0 Key Personnel and Responsibilities

All Three Notch personnel have received an initial 40-hour HAZWOPER certification, which is updated annually through an 8-hour refresher course. This training course meets the requirements of the OSHA 29 CFR 1910.120 standards. Three Notch personnel assigned to the project include:

NAME	TITLE	RESPONSIBILITIES
David Dailey or Alan Barck	Professional Engineer/ Corporate HSO	Overall management of entire project from beginning to completion. Responsible for preparation and implementation of the HASP and reporting of all hazard incidents to appropriate enforcement agencies. Coordinates and oversees all field activities.
Anna Brunson	Project Manager / Site HSO	Performs all field activities and is responsible for recognizing site hazards and reporting hazard incidents to Corporate HSO.

4.0 Scope of Work

Work to be performed will include installation activities.

4.1 Installation Activities

Installation activities generally involve preparing the site for installation activities and also the construction of the Multi-phase Extraction (MPE) unit onsite. More specifically this will include:

- Preparing the site for work to be performed
- Saw-cutting concrete surface, excavating, and installing well vaults
- Installing polyvinyl chloride (PVC) extraction piping and subsurface utility lines
- Installing piping connections from extraction piping to wellhead
- Overseeing placing and leveling of remediation system
- Completing all piping connections from extraction and utility lines to remediation unit
- Completing all electrical connections
- Installing concrete block security fence
- Inspecting rotation on all electric motors
- Inspecting PVC piping, extraction lines, treatment system, and associated connections for leaks at start up

4.2 Operation and Maintenance Activities

Subsequent to the construction and installation of the MPE unit, the unit must periodically undergo inspections or maintenance. Three Notch field personnel will inspect the unit on a weekly basis, taking certain instrument readings necessary to determine the progress of the remediation being performed at that particular site. Maintenance of the unit is performed on an as needed basis. The following applies to operation and maintenance activities associated with the MPE unit:

- Inspecting proper working condition of telemetry system
- Lubricating motors
- Inspecting piping for leaks
- Inspecting belts on Liquid Ring Vacuum Pump (LRVP) system
- Periodic cleaning of equipment and components
- Periodic inspections of electrical connections
- Measuring induced vacuum in on site monitoring wells
- Removing silt and sludge buildup from knockout pot air stripper, filtration system and other system components
- Measuring air flow from MPE unit

- Measuring liquid levels in wells
- Sampling effluent for discharge parameters
- Measuring volume of liquids removed and discharged

5.0 Chemical Hazards

When conducting the aforementioned corrective action activities, the primary chemicals of concern are gasoline.

5.1 Gasoline and Diesel

Gasoline and diesel are substances to be potentially encountered in the soil and groundwater at the site. Gasoline components include benzene, toluene, ethylbenzene, and xylenes (BTEX). Diesel components may include anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, fluoranthene, fluorene, naphthalene, phenanthrene, and pyrene.

5.2 Hazard Identification

During the corrective action activities, many hazards or potential hazards may be encountered when dealing with gasoline or diesel. This section serves as a guideline in recognizing hazards associated with these chemicals that exist or may potentially arise during field activities. Recognition is the first step in eliminating exposure to these hazards.

Occasionally methyl-tertiary butyl ether (MTBE) is encountered. MTBE has been used since 1979 as an oxygenate to gasoline in order to decrease carbon monoxide production in cars, particularly older model cars; however, MTBE has been determined to be a potential carcinogen. MTBE has low taste and odor thresholds, which can make a water supply non-potable even at low concentrations.

Exposure to MTBE will only be seen through exposure to gasoline containing MTBE and the effects of gasoline containing MTBE are relatively similar to gasoline not containing MTBE. The following are hazards associated with exposure to gasoline:

- Contact may irritate or burn the skin and eyes and absorption through the skin may be poisonous
- Vapors may be poisonous if inhaled and are irritating to the respiratory tract

- Vapors are an explosion hazard and may travel to a source of ignition and produce flashback
- A gasoline fire may produce irritating and poisonous gases
- Gasoline and diesel are flammable/combustible materials that may be ignited by heat, sparks, or flames, and a gasoline container may explode when exposed to heat or fire

The primary hazard associated with exposure to gasoline is the inhalation of vapors.

5.3 Hazard Prevention

Preventing exposure to chemical hazards generally requires the use of personal protective equipment (PPE). Level D equipment will provide the protection necessary to prevent exposure to these hazards. Level D equipment is discussed further in Section 10.1, Personal Protective Equipment.

5.4 Symptoms and First Aid Procedures

Many of the constituents found in gasoline and diesel act as central nervous system (CNS) depressants. The following table includes first aid measures for CNS depressants, which affect a person through inhalation (breathing), dermal (skin), or ingestion (mouth) exposure. In addition, the eye can be very sensitive to exposure to chemicals and is therefore included in the following table:

ROUTES OF EXPOSURE	SYMPTOMS	TREATMENT
Inhalation	Dizziness, nausea, lack of coordination, headache, irregular and rapid breathing, weakness, loss of consciousness, coma	Bring victim to fresh air. Rinse eyes or throat with plenty of water, if irritated. If symptoms are severe (victim vomits, is very dizzy or groggy, etc.), evacuate to hospital. Be prepared to administer CPR if certified. Monitor victim for at least 48 hours.
Dermal	Irritation, rash, or burning	Flush affected area with water for at least 15 minutes. Apply clean dressing and get medical attention.
Ingestion	Dizziness, nausea with stomach, cramps, loss of consciousness, coma	Evacuate victim to hospital. Do not induce vomiting.

ROUTES OF EXPOSURE	SYMPTOMS	TREATMENT
Eye	Redness, irritation, pain, impaired vision	Flush with an abundant amount of water for at least 15 minutes. If severe, seek medical attention immediately.

6.0 Equipment/Operational Hazards

The following sections will address the hazards, preventative measures, and first aid procedures associated with the drill rig, backhoes, and other heavy equipment. The drill rig used during these field activities generally requires the use of augers for probing. These augers are designed to rotate in a circular motion while being forced downward through the soil. Field personnel are required to assemble and disassemble these parts. Contact with these rotating parts is one recognized hazard. In addition, the machinery also contains parts that become increasingly heated during operation.

6.1 Hazard Identification

There are several hazardous associated with use of any type of drill rig and heavy machinery while performing corrective action activities. Generally during these field operations, the general public may become fascinated with the operation and approach the work area. All unauthorized personnel are required to remain 100 feet away from the work area. The site HSO officer will be responsible for keeping all unauthorized personnel away from the work area. The hazardous associated with the use of a drill rig or other heavy machinery is as follows:

- Gasoline vapors from nearby dispensers can potentially enter the diesel-operated engine thereby causing fire/explosion hazards
- Rotating augers may catch onto gloves or clothing thereby pulling hands arms into the rotating machinery
- Drilling equipment may rupture hydraulic hoses thereby releasing hydraulic fluids
- Engine and exhaust system of an engine are extremely hot during and following operation
- Potential contact with overhead and underground utilities
- Open excavations/boreholes can be the source of trips and falls
- Digging machinery such as backhoes may puncture subsurface utilities
- Operators of heavy machinery may be unable to locate pedestrians near the operating equipment; therefore, all field personnel are to remain with eye contact of the operator at all times during operation

6.2 *Hazard Prevention*

Hazards associated with heavy machinery can easily be avoided with additional planning. The key to avoiding these hazards includes being familiar with the equipment and the process. In addition, being familiar with and implementing the precautionary measures listed below may reduce or eliminate the risks of a hazardous situation.

- Wear hard hat when working near or around the machinery
- Wear safety glasses when performing maintenance to machinery or power tools
- Shut down the machine engine when repairing or adjusting equipment
- Prevent accidental starting of engine during maintenance procedures by removing or tagging ignition key
- Block wheels or lower leveling jacks and set hand brakes to prevent equipment from moving during drilling procedures
- When possible, release all pressure on hydraulic systems, drilling fluid systems, , and air pressure systems of heavy machinery prior to performing maintenance
- Know the location of the emergency shut-off switch for all equipment
- Avoid contact with engine or exhaust system of engine following its operation
- Avoid using gasoline or other volatile/flammable liquids as a cleaning agent on or around heavy machinery
- Replace all caps, filler plugs, protective guards or panels, and high-pressure hose clamps, chains or cables moved during maintenance prior to excavation
- Avoid wearing rings or jewelry during drilling or installation procedures
- Be aware of all overhead and underground utilities
- Avoid alcohol or other CNS depressants or stimulants prior to excavation
- Avoid contact with equipment parts during freezing weather. Freezing of moist skin to metal can occur almost instantaneously
- Shut all field operations during an electrical storm
- Do not operate heavy equipment within 20 feet of overhead power lines

6.3 *Symptoms and First Aid Procedure*

Hazards associated with heavy equipment were identified in Section 6.1. Unlike hazards associated with temperature or chemicals, symptoms will not be apparent with these types of hazards. In addition, these hazards will occur rapidly as opposed to over a period of time. Due to the size and composition of hydraulic vehicles, exposure to these hazards will range from extremely serious to life-threatening; therefore, Three Notch requires that exposed field personnel

seek medical attention at the nearest medical facility and the Project Manager be notified immediately. A site location map to the nearest hospital is presented at the end of this plan.

7.0 Temperature Hazards

Another hazard associated with corrective action activities involves working in extreme weather conditions. Temperatures in the Southeast USA during the spring, summer, and occasionally the fall seasons can vary from mild to extremely hot. During this season, extra precautions are necessary to prevent hazards associated with elevated temperatures, which result in various forms of heat stress. In addition, the Southeast is known for its rather mild winter condition; however, on occasion, the Southeast may experience freezing conditions; therefore, precautions are also necessary to prevent hazards associated with these extreme temperatures.

7.1 Heat

As stated in OSHA's regulatory guidelines for heat exposure operations involving high air temperatures, radiant heat sources, high humidity, direct physical contact with hot objects, or strenuous physical activities have a high potential for inducing heat stress. Additional factors to consider in the determination of heat stress on an individual include age, weight, degree of physical fitness, degree of acclimatization, metabolism, use of alcohol or drugs, and a variety of medical conditions such as hypertension (high blood pressure). The following sections will identify the hazards associated with heat stress, the measures needed in order to prevent exposure to these hazards, and first aid procedures in the event exposure to these hazards should occur.

7.1.1 Hazard Identification

Heat stress is a major hazard, especially for workers wearing protective clothing. Depending on the ambient conditions and the work being performed, heat stress can occur very rapidly- within as little as 15 minutes. The key to preventing excessive heat stress is educating personnel on the hazards associated with working in heat and the benefits of implementing proper controls and work practices. The hazards associated with heat stress range from heat fatigue (mild discomfort) to heat stroke (extreme danger, which may result in death, and are discussed in the following sections.

7.1.1.1 Heat Fatigue

Heat fatigue occurs due to a lack of acclimatization (adjusting one's tolerance to work in elevated temperatures). Acclimatization is a gradual process. This process should include all field

personnel being permitted to work in elevated temperatures in specified increments. On a daily basis, the maximum allowable work period should gradually be increased until the worker is able to perform his/her duties more proficiently under these conditions. The use of an acclimatization program is recommended in the regulatory guidelines established by OSHA.

7.1.1.2 Heat Rash

Heat rash (prickly heat) is the most common heat stress factor and may result from continuous exposure to heat or humid air where the skin remains wet due to lack of evaporation. Under these conditions, sweat ducts become plugged, and a skin rash appears, generally in areas where clothing is restrictive. This uncomfortable rash can be prevented by resting in a cool place during breaks and by implementing good daily personal hygiene.

7.1.1.3 Heat Collapse

Heat collapse is commonly referred to as “fainting.” Fainting generally occurs when the brain does not receive enough oxygen. As a result of this condition, the exposed individual may lose consciousness. Heat collapse is rapid and unpredictable; therefore, acclimatization is an important factor in preventing this condition.

7.1.1.4 Heat Cramps

Heat cramps are muscular spasms, which usually occur in the abdomen or limbs due to loss of electrolytes following profuse sweating. Cramps are caused by either too much or too little salt intake. During the sweating process, salt exits the body; therefore, without the proper replenishment, the body experiences an electrolyte imbalance thereby inducing heat cramps. Thirst cannot be relied upon as a guide to the need for water. When working in hot environments, water must be replenished every 15 to 20 minutes.

7.1.1.5 Heat Exhaustion

Heat exhaustion is a result of overexertion in hot or warm weather. It is highly possible for an onsite worker to experience heat exhaustion due to the use of worker-protective coveralls, boots, gloves, and respirator protection, even when ambient temperatures are mild. Fainting may also occur with heat exhaustion. This can become an extreme hazard if operating heavy machinery.

Caution: Individuals with heart problems or on a “low sodium” diet who work in these environments should consult a physician and Corporate HSO prior to working in these conditions.

7.1.1.6 Heat Stroke

Heat stroke is the most severe form of heat stress. The body's temperature control system is maintained through sweat production. Perspiration is a cooling process for the body and keeps the body core temperature within a stable range. During heat stroke, sweat production is inhibited and the body temperature begins to rapidly rise. Brain damage and death may occur if body core temperature is extremely elevated and is not reduced.

7.1.2 Hazard Prevention

Hazards associated with temperature extremes can also be prevented with additional planning and preparation. The hazards associated with temperature can range from heat fatigue to heat stroke as described previously in Section 7.1.1 Measures to ensure the prevention of temperature hazards are as follows:

- Adhere to acclimatization process by exposing field personnel to progressively longer periods of time in hot environments.
- Schedule work for early morning or evening during warm weather
- Work in shifts; limit exposure time of personnel and allow frequent breaks
- Have cool liquids at an Exclusion Zone border for exposed personnel to continuously replace body fluids. As stated in the previous section, OSHA recommends that fluids, preferably water and/or a water-electrolyte solution be replenished every 15 to 20 minutes.
- Avoid caffeine and alcoholic beverages both during work hours and 24 hours prior to performing field activities

The site HSO or designee should continually monitor personnel for signs of heat stress. If any signs of heat disorders are apparent, all field personnel must immediately rest and replenish fluids until body core temperature is lowered and remains stable.

7.1.3 Symptoms and First Aid Procedures

As discussed previously in Section 7.1.1, hazards associated with heat stress range from heat fatigue to heat stroke. Taking precautionary measures to ensure that personnel are not exposed to extreme temperatures for long periods of time can prevent these hazards. First aid measures for heat fatigue, heat rash, and heat collapse include taking frequent breaks so that the body core temperature can cool down. The following table includes first aid measures for signs of overexposure to heat.

TEMPERATURE HAZARDS	SYMPTOMS	TREATMENT
Heat Fatigue	Impaired performance of skilled sensorimotor, mental or vigilance jobs	No known treatment. Victim should be placed under cooler conditions until body core temperature lowers.
Heat Rash	Rash due to plugged sweat ducts, generally where clothing is restrictive	Keep dry towels or paper towels at the site to dry skin when excessive sweating occurs. Rash usually disappears when affected individual returns to cooler environment.
Heat Collapse	Loss of consciousness	Attempt to awaken individual. Relocate victim to a cooler area until body core temperature lowers and replenish fluids. Victim should rest for a few days.
Heat Cramps	Uncontrollable muscle spasms	Apply warm, moist heat and pressure to reduce pain. Give electrolyte drinks by mouth. Victim should intake additional potassium (Bananas are good potassium source).
Heat Exhaustion	Pale, clammy skin, profuse perspiration, weakness, headache, and nausea	Get victim into shade or cooler place. Immediately remove any protective clothing. Victim should drink plenty of fluids. Victim should lie down with feet raised. Fan and cool victim with wet compresses. If vomiting occurs, transport to hospital. Victim should rest for a few days.
Heat Stroke	Pale, dry skin due to lack of perspiration, weakness, unconsciousness	Immediately take precautions to cool body core temperature by removing clothing and sponging body with cool water, or placing in tub of cool water until temperature is lowered sufficiently (102°F). Stop cooling and observe victim for 10 minutes. Once temperature remains lowered, dry person off. Use fans or air conditioning, if available. Do not give the victim stimulants. Transfer to medical facility. Under no condition is the victim to be left unattended unless authorized by a physician.

8.0 Explosion/Electrocution Hazards

As stated previously in Section 4.1, extensive efforts are made in order to determine the location of subsurface utilities prior to corrective action activities. Efforts are made to obtain the location of underground utilities through the Line Locator Services, and utility companies are notified in

advance to perform a site inspection and utility marking; however, the potential for a subsurface utility to go unnoticed exists. Therefore, the hazards associated with exposure to these utilities are identified and preventative measures and first aid procedures are discussed further in the following sections.

8.1 Explosion

Primarily when dealing with subsurface utilities, two potentially life-threatening hazards exist. The first hazard identified in association with subsurface utilities during excavation activities are discussed further in the following section.

8.1.1 Hazard Identification

The main hazard associated with puncturing a subsurface utility gas line is explosion. By releasing gas (usually natural gas, which is generally methane gas or propane gas) into the atmosphere, explosive conditions are favorable; therefore, ignition sources must be immediately eliminated in the event a gas release occurs. Due to the flammability of gasoline, ignition sources will be minimized; however, the engines are needed during field activities. Therefore, the only alternative to reducing the explosion hazard is to stop the release as soon as possible. However, when dealing with gases under pressure, the volatilization process may occur at such a rapid speed that an explosive situation is inevitable.

8.1.2 Hazard Prevention

Preventative measures are ensured prior to field activities. These measures generally encompass locating subsurface utilities. In addition, Three Notch will request local utility companies to perform site inspections and mark all subsurface utilities. In addition to this notification, if a particular subsurface utility is not identified and Three Notch suspects the utility to exist, Three Notch will take additional precautionary measures to ensure the suspected utility does not exist. These measures generally include locating utility meter boxes, etc. In addition, a field technician or subcontractor will generally probe the ground with a small rod in order to possibly identify the existence of subsurface utilities. This is conducted usually when machinery reaches 2-3 feet below the ground surface (ft-bgs).

8.2 Electrocution

8.2.1 Hazard Identification

The main hazard associated with puncturing a subsurface electrical line or coming into contact with an overhead power line is electrocution. When dealing with electricity, all things are classified as either conductors or insulators. Conductors allow electricity to pass through them while insulators prevent electricity to pass through. Examples of conductors are metals, wood, and water, and examples of insulators are rubber and PVC. Humans are also classified as conductors; therefore, contact with electrical sources can be fatal.

Because the heavy machinery is metal, which has been classified as one of the best sources of electrical conduction, contact with exposed electrical lines will allow current to flow. The National Electrical Code (NEC) has determined that 20 milliamps (mA) of current can be fatal. For comparison, a common household circuit breaker may conduct 15, 20, or 30 amps of electrical current.

8.2.2 Hazard Prevention

As stated previously in Section 8.1.2, preventative measures to locate subsurface and overhead electrical lines prior to corrective action activities are required by Three Notch. Three Notch will notify local utility companies to provide a site inspection and mark any existing subsurface electrical lines. In addition, Three Notch will contact the local power provider to insulate overhead lines if necessary. When dealing with the electrical components of the dewatering system, the following precautionary measures may prevent exposure to electrocution:

- Avoid contact with exposed connections/wiring and other related components
- If unfamiliar with the system, do not attempt contact with any component
- Call the Project Manager if unsure of any connections associated with the operations of the system.

8.2.3 Symptoms and First Aid Procedures

As discussed previously in Section 8.2.1, the hazard associated with puncturing subsurface electrical utilities and contacting electrical components of dewatering system is electrocution. The primary route of exposure is contact. The transmission of electricity is allowed because the metal equipment serves as a conductor for electrical current. Symptoms and treatment for exposure to

electrical current is presented in the following table:

Caution: NEVER attempt to dislodge or remove someone that is contacting a high voltage line
Use an insulating material (PVC) to release the victim from the electrocution source.

9.0 Miscellaneous Hazards

The last hazard identified when performing corrective action activities has been classified as miscellaneous hazards due to the variety of these hazards. These hazards generally are nothing more than nuisances and with additional planning should be entirely avoidable; however, there are instances in which exposure to these hazards will occur. Therefore, these hazards are identified and preventative measures and first aid procedures are discussed in further detail in the following sections.

9.1 Hazard Identification

Occasionally, exposure to common nuisances may potentially result in a life-threatening situation. For example, a wasp or bee sting for some individuals only causes irritation or localized soreness; however, to others with little tolerance for wasp or bee venom, an allergic reaction can result which could potentially lead to death if not treated immediately. Therefore, allergic reactions to these insects have been identified as a potential hazard. In addition to the insects, contact with black widow spiders (red hourglass), brown recluse spiders (violin shape on back), and snakes are also potential hazard.

9.2 Hazard Prevention

Prevention, with regards to miscellaneous hazards, is more difficult to plan ahead. Generally, prior to conducting corrective action activities, the primary location for the activities has been established; therefore, barricades such as cones and company vehicles can be placed around the work area to prevent exposure to incoming and ongoing vehicles. However, the limitation to using cones is that they are often small and unnoticeable to drivers once inside the vehicles; therefore, the best prevention with regards to this miscellaneous hazard is to constantly be aware of your surroundings. This preventative measure can also be applied to exposure to insects, snakes, and spiders. Be aware of your surrounding when working around dark, secluded areas such as cracks and crevices, where snakes, spiders, and mice like to hide.

9.3 Symptoms and First Aid Procedures

If an employee or subcontractor shows any signs of an allergic reaction (anaphylactic shock, hives,

or difficulty breathing) to a sting or bite, immediately seek medical attention at the nearest hospital. In the event that an operating vehicle strikes a person, seek medical attention immediately. In the meantime, a first aid kit and eye wash bottle will be provided by Three Notch and should be kept in all company vehicles. If field personnel are aware of their allergic reactions to insect bites, Three Notch requires that medication be kept on hand during field activities and at least one other field technician be made aware of the medication in the event of an allergic reaction should occur.

10.0 Additional Precautions

Additional precautions have been implemented in order to ensure overall safety for all field personnel. The safety protocols listed in this segment are to be considered the minimum requirements to be met by all field personnel engaging in corrective action activities.

10.1 Personal Protective Equipment

PPE is the most effective measure to prevent exposure to chemical hazards. There are four levels of PPE protection ranging from Level A to Level D equipment. Level A protection serves as the most conservative protective equipment, and Level D protection serves as the least conservative protective equipment. These levels are described further in the following table:

LEVELS OF PPE PROTECTION	PPE REQUIREMENTS
Level A	Worn when the highest level of respiratory, skin, and eye protection is necessary.
Level B	Worn when the highest level of respiratory protection is needed, but a lesser level of skin protection is necessary.
Level C	Worn when the criteria for using air-purifying respirators are met, and a lesser level of skin protection is necessary.
Level D	Refers to work conducted without respiratory protection. This level should be used only when the atmosphere contains no known or suspected airborne chemical or radiological contaminants and oxygen concentrations are between 19.5 % and 23.0%

Level D protective clothing, as indicated below, shall be considered the minimum requirements for installation and excavation operations:

- Hard hat
- Coveralls*
- Non permeable gloves

- Steel-toe, non-permeable boots
- Hearing protection*
- Safety goggles (chemical)*

*These items are mandatory on an “as needed” basis. Generally, normal site conditions do not warrant the use of this equipment; however, under certain conditions where large amounts of free product are encountered, the issue of coveralls and safety goggles may be warranted. Safety goggles and hearing protection are mandatory when near the drill rig to reduce stress on the ear and also prevent objects from the soil or drill rig from lodging in the eye.

Equipment may be upgraded to Level C depending on the site conditions and/or monitoring results. Level C protection, in addition to Level D protection, includes the following:

- Rubber/chemical resistant outer gloves
- Face-shield if splash hazards exist
- Outer disposable booties
- Half-mask respirator

10.2 Signs, Signals, and Barricades

As stated previously in Section 9.1, corrective action activities are generally conducted at retail gasoline facilities and convenience stores, and are therefore, high traffic areas. All Three Notch field personnel must be aware of his/her surroundings at all times. In addition, the items listed below will be provided to secure the area in order to protect all field personnel as well as the general public.

- Utilize barricades to protect workers, pedestrians and vehicles from work activities
- Post area for “NO SMOKING”
- Utilize cones to protect workers from incoming and ongoing vehicles

10.3 Fire Protection and Prevention

As stated previously in Section 5.1, gasoline is a highly flammable substance. Three Notch requires that the work area be posted with “NO SMOKING” signs in an attempt to prevent fires from occurring; however, as a secondary precaution Three Notch plans to implement the following:

- Maintain a 20 lb. ABC Dry Chemical fire extinguisher on site at all times
- Eliminate ALL ignition sources in the vicinity of any releases
- The contractor will clean up all small spills using absorbent materials or by pumping

10.4 Storage and Decontamination

During the corrective action activities, impacted soils will be encountered. Groundwater will be treated and pumped to an NPDES outfall. Contaminated soil will be temporarily stored until transported for disposal. Decontamination procedures will be implemented should chemical exposure occur. The procedures are detailed below:

- Avoid contact with liquid gasoline or diesel
- Place contaminated soil on visqueen and cover once removed from the excavation
- Change any product contaminated soil immediately
- Wash any contaminated skin surfaces immediately with soap and water

Caution: All personnel are required to wash hands at the completion of work, before and after restroom use and before eating in order to prevent dermal contact with or ingestion of contaminants encountered during field activities.

11.0 Emergency Contingency Plan

If an incident occurs that requires declaring an emergency, all personnel will assemble at a designated emergency meeting location for further instruction. Arrangement for decontamination, evacuation and/or transport will be made at that time. The client and appropriate Three Notch personnel will be notified of the incident as soon as possible.

11.1 Notification/Reporting Procedures

In the event of an emergency, Three Notch Project Manager will be notified as soon as possible regarding the nature of the incident and emergency service contact will be notified as needed (see Section 11.7, Contingency Contacts). It is the responsibility of the Site HSO to report all incidents to the Three Notch Corporate HSO so that the required reporting procedures may be implemented.

11.2 Hazardous Substance Release

In the event that potentially hazardous substances migrate from the work zone and potentially

endanger unprotected personnel or the community all on site activities will cease until the release is brought under control. Three Notch will immediately notify the proper authorities so that they may be able to ensure that public health and safety is maintained throughout this process event to the extent of evacuation if necessary.

11.3 Personnel Injury

In the event of an injury, all personnel will assemble at the designated emergency meeting location. The Site HSO, prior to the beginning of filed activities should designate this location. If the injured person is immobile one or more persons should remain nearby to provide any necessary first aid techniques. If medical help is necessary, the Site HSO will summon the appropriate assistance for transportation to the nearest medical facility. Due to the potential for these situations, Three Notch recommends that at least one qualified person be CPR/First Aid certified.

11.4 Evacuation Plan

Gasoline and diesel are flammable substances; therefore, a fire/explosion potential exists during the excavation activities. In the event of an onsite evacuation, the following plan will be implemented:

- A signal consisting of one continuous blast of a vehicle or air horn will be used
- All personnel will immediately evacuate the area and report to the designated emergency meeting location for further instruction

11.5 Spill Prevention and Response

In the event of a leak or spill, the area will be blocked using barricades, and the spill contained until absorbed and removed by authorized personnel. Unauthorized persons will be denied access to the area until all spills have been removed and field operations completed. Three Notch will follow prescribed procedures for reporting and responding to large releases by notifying the National Response Center (see Section 11.7). All materials will be disposed of according to regulatory guidelines.

11.6 Emergency Communication

In the event of an emergency situation, the following standard hand signals will be used onsite as a means of communication:

- Hand gripping throat (cannot breathe)
- Grip partner's wrist or both hands around waist- (leave area immediately)
- Hands on top of head- (need assistance)
- Thumbs up- (OK, I am all right, I understand)
- Thumbs down- (No, negative)

11.7 Contingency Contacts

In the event of an emergency, Three Notch has provided several emergency contacts. These contacts, along with phone numbers, are listed in the following table. The Site HSO will be responsible for the notification of these contacts in the event of an emergency.

AGENCY	CONTACT	TELEPHONE NO.
Fire Department	Brewton Fire Dept.	251-867-7165
Police Department	Brewton PD	251-867-3212
Ambulance	McMillian Ambulance	251-809-8140
Hospital	D.W. McMillian Memorial Hospital	251-867-8061
Corporate HSO	Alan Barck	334-222-9431
Project Manager	Anna Brunson	334-222-9431
EPA RCRA-Superfund Hotline		800-424-9346
Chemtrec (24 hours)		800-424-9300
Bureau of Explosives (24 hours)		202-293-4048
Centers for Disease Control (Biological Agents)		404-633-5353
National Response Center		800-424-8802

Medical Facility

Name of Hospital: D.W. McMillian Memorial Hospital

Address: 1301 Belleville Ave., Brewton, Alabama

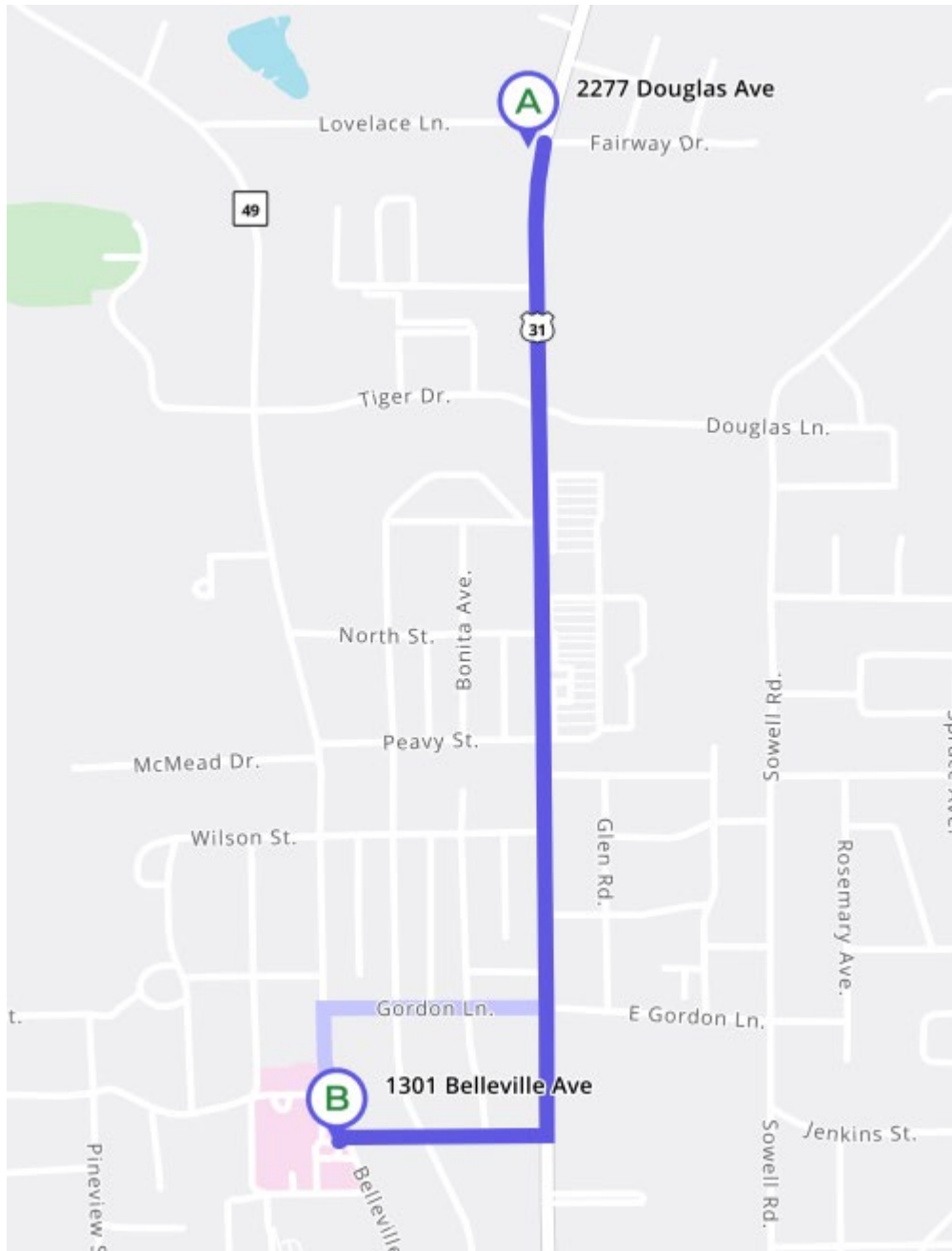
Phone: 251-867-8061

Route to Hospital: Head south of Douglas Ave (US-31). Go for 1.1 miles; Turn right onto Davison St. Go for 0.2 miles; Turn slightly left. Go 43 ft; arrive

Travel Time from Site: 3 minutes

Distance to Hospital: 1.33 miles

In cases of construction accidents, rapid notification to OSHA is required.



ADEM FORMS

UST RELEASE FACT SHEET

GENERAL INFORMATION:

SITE NAME: AL0006
ADDRESS: 2277 Douglas Avenue
Brewton, Escambia County, Alabama

FACILITY I.D. NO.: 25265-053-018577
INCIDENT NO.: UST24-12-05

RESULTS OF EXPOSURE ASSESSMENT:

How many private drinking water wells are located within 1,000 ft. of site?

0

How many public water supply wells are located within 1 mile of the site?

0

Have any drinking water supply wells been impacted by contamination from this release?

No

Is there an imminent threat of contamination to any drinking water wells?

☐ Yes ☒ No

Have vapors or contaminated groundwater posed a threat to the public?

☐ Yes ☒ No

Are any underground utilities impacted or imminently threatened by the release?

☐ Yes ☒ No

Have surface waters been impacted by the release?

☐ Yes ☒ No

Is there an imminent threat of contamination to surface waters?

☐ Yes ☒ No

What is the type of surrounding population?

Commercial/Residential

CONTAMINATION DESCRIPTION:

Type of contamination at site: ☒ Gasoline, ☐ Diesel, ☐ Waste Oil
☐ Kerosene, ☐ Other _____

Free product present in wells? ☒ Yes ☐ No Maximum thickness measured: 8.17 ft in MW-14 on 01/06/25

Maximum BTEX concentrations measured in soil: 298.70 mg/Kg BTEX in MW-2 (20 – 25 ft-bls) on 02/20/24

Maximum BTEX or PAH concentrations measured in groundwater: 264.40 mg/L in MW-2 on 05/31/24

**ADEM GROUNDWATER BRANCH
UST SITE CLASSIFICATION SYSTEM
CHECKLIST**

Please read all of the following statements and mark either yes or no if the statement applies to your site. If you have conducted a Preliminary or Secondary Investigation, all questions should be answered. Closure site assessment reports may not provide you with all the necessary information but answer the statements with the knowledge obtained during the closure site assessment.

SITE NAME: AL0006

SITE ADDRESS: 2277 Douglas Avenue
Brewton, Escambia County, AL

FACILITY I.D. NO.: 25265-053-018577

UST INCIDENT NO.: UST24-12-05

OWNER NAME: LGWS/Cross America Partners

OWNER ADDRESS: 600 Hamilton St., Suite 500
Allentown, PA 1810

NAME & ADDRESS OF PERSON
COMPLETING THIS FORM: Anna Brunson, Project Manager
Three Notch Group
11 West Court Square
Andalusia, AL 36420

CLASSIFICATION	DESCRIPTION	YES	NO
CLASS A	IMMEDIATE THREAT TO HUMAN HEALTH, HUMAN SAFETY OR SENSITIVE ENVIRONMENTAL RECEPTOR		
A.1	Vapor concentrations at or approaching explosive levels that could cause health effects, are present in a residence or building.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A.2	Vapor concentrations at or approaching explosive levels are present in subsurface utility system(s), but no buildings or residences are impacted.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CLASS B	IMMEDIATE THREAT TO HUMAN HEALTH, HUMAN SAFETY OR SENSITIVE ENVIRONMENTAL RECEPTOR		
B.1	An active public water supply well, public water supply line or public surface water intake is impacted or immediately threatened.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B.2	An active domestic water supply well, domestic water supply line or domestic surface water intake is impacted or immediately threatened.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B.3	The release is located within a designated Wellhead Protection Area I.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CLASS C	IMMEDIATE THREAT TO HUMAN HEALTH, HUMAN SAFETY OR SENSITIVE ENVIRONMENTAL RECEPTOR		
C.1	Ambient vapor/particulate concentrations exceed concentrations of concern from an acute exposure, or safety viewpoint.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C.2	Free product is present on the groundwater, at ground surface, on surface water bodies, in utilities other than water supply lines, or in surface water runoff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

CLASSIFICATION	DESCRIPTION	YES	NO
CLASS D	SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS		
D.1	There is a potential for explosive levels, or concentrations of vapors that could cause acute effects, to accumulate in a residence or other building.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D.2	A non-potable water supply well is impacted or immediately threatened.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D.3	Shallow contaminated surface soils are open to public access, and dwellings, parks, playgrounds, day care centers, schools or similar use facilities are within 500 feet of those soils.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CLASS E	SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS		
E.1	A sensitive habitat or sensitive resources (sport fish, economically important species, threatened and endangered species, etc.) are impacted and affected.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CLASS F	SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS		
F.1	Groundwater is impacted, and a public well is located within 1 mile of the site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F.2	Groundwater is impacted and a domestic well is located within 1,000 feet of the site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F.3	Contaminated soils and/or groundwater are located within designated Wellhead Protection Areas (Areas II or III).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CLASS G	SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS		
G.1	Contaminated soils and/or groundwater are located within areas vulnerable to contamination from surface sources.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CLASS H	SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS		
H.1	Impacted surface water, storm water or groundwater discharges within 500 feet of a surface water body used for human drinking water, whole body water-contact sports, or habitat to a protected or listed endangered plant and animal species.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CLASS I	LONG TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS		
I.1.	Site has contaminated soils and/or groundwater but does not meet any of the above-mentioned criteria.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ADDITIONAL COMMENTS:

Complete the classification evaluation questions listed above. Upon completion, determine the highest rank of the site (A.1 is the highest rank) based on the statements answered with a yes.

Enter the determined classification ranking:	C.2
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TASKS PERFORMANCE SUMMARY

TASK PERFORMANCE SUMMARY

Corrective Action Plan, CP-10

AL0006

2277 Douglas Avenue

Brewton, Escambia County, AL

Task Completed by Personnel/Title:	Project Management	Work Plan Preparation/ Review	Cost Proposal Preparation/ Review	Field Work	Data Interpretation/ Tabulations	Drafting	Report Preparation/ Review	Payment Request Preparation/
Alec Black, PG				X			X	
Anna Brunson, Project Manager	PM	PM	PM	PM	PM		PM	PM
Ray Hollinghead, Drafter						X		
Kim Ballard, Administrative Assistant	X		X					
Leigh Caylor, Administrative Assistant	X		X				X	X
Patricia Horwath, Administrative Assistant			X				X	X

Notes:

DO=Drilling Oversight

BL=Boring Log Description/Soil Classification

WG=Well Gauging

GSC=Groundwater Sample Collection

MEME=MEME Oversight

PM=Project Management

O&M=Routine Operation & Maintenance

HRS=High Resolution Study

VM=Vapor Monitoring

FC=Fan Check