



SHOP N FILL #9 CHEVRON

CAP MODIFICATION
(DECEMBER 2025)

ATTF CP-26

December 19, 2025



1207 West Park Street
Sylacauga, Talladega County, AL
FAC ID 10642-121-005311
UST 19-07-06

PREPARED FOR

Bowden Oil Company
P.O. Box 145
Sylacauga, AL 35150

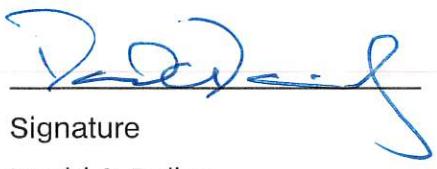
PREPARED BY

Three Notch Group
700 Southgate Drive, Suite A
Pelham, AL 35124

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 Shop N Fill #9 Chevron site (Facility Identification Number 10642-121-005311) in Sylacauga, Talladega County, Alabama. The recommended action should not be construed to apply to any other site.


Signature

David C. Dailey

Registered Engineer in the State of Alabama

Registration No. 23095

12/18/2025

Date



INTRODUCTION

The Shop N Fill #9 Chevron facility currently serves as an active service station. The underground storage tank (UST) system consists of one 10,000-gallon unleaded gasoline UST, one 10,000-gallon midgrade gasoline UST, and one 10,000-gallon premium grade gasoline UST. Gasoline fueling dispensers are located beneath the canopy. The Alabama Tank Trust Fund (ATTF) responsible party for the Shop N Fill #9 Chevron site is Bowden Oil Company, Inc. (Bowden).

On May 29, 2019, a Limited Phase II Investigation was conducted by Technical Services Company at the Shop N Fill #9 Chevron site. Results of the Limited Phase II Investigation indicated that a possible reportable release of petroleum products may have occurred at the site. In response, the Alabama Department of Environmental Management (ADEM) sent the responsible party, Bowden a Notification of Requirement (NOR) to conduct Investigative and Corrective Actions. In additional letters dated August 12, 2019, ADEM also issued a Notice of ATTf Eligibility and Pre-Approved Cost Proposal (CP-01) for conducting Preliminary Investigation activities.

To date, Preliminary Investigation, Secondary Investigation, groundwater monitoring, Mobile Enhanced Multi-Phase Extraction (MEME), Alabama Risk Based Corrective Action (ARBKA) Evaluation, Corrective Action Plan (CAP) Evaluation, CAP Development, and Well Installation activities have been completed at the site. Currently there are a total of ten 2-inch Type II monitoring wells (MW-2, MW-5 through MW-13), one Type III vertical delineation well (VW-1), three 4-inch Type II recovery wells (RW-1, RW-3, and RW-4), and seven 1-inch Type II air sparge wells (AS-1 through AS-7) at the site.

In a letter dated June 16, 2025, ADEM requested that a Modified CAP be prepared. The approved scope of work under Cost Proposal CP-26 was to modify the site-specific CAP for the remediation of groundwater and soil, incorporating the results of the previous investigation efforts. This report summarizes the results of these activities.

REMEDIAL OBJECTIVES AND EXPOSURE ASSESSMENT

General Remedial Objectives

The general objectives of the corrective action plan and the remedial efforts 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.
- Reduce adsorbed phase petroleum hydrocarbons from soils within the vadose and saturated zone, to below approved Site-Specific Target Levels (SSTLs).
- Reduce dissolved petroleum hydrocarbons from groundwater to below approved SSTLs.
- Accomplish these objectives within the proposed period of operation.

Exposure Assessment

An exposure assessment was conducted by Three Notch Group, Inc. (Three Notch) during the ARBCA Evaluation completed in June 2010. 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.
Residences	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.
Utilities	Water	On-Site	Not Complete. Water and sewer are supplied by municipal sources. Utilities are not impacted nor potentially impacted by this release.

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.

Results of the water well inventory indicate that there are no public water supply wells located within one mile 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 Shop N Fill #9 Chevron site, an ARBCA Tier I/Tier II Evaluation was performed in February 2021. 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 developed during this process, which have been approved by ADEM, would not pose a significant risk to any recognized actual or potential receptors. 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	On-Site Ingestion
Benzene	513	11.2	1.72	0.523	55.7	8.49	NA
Toluene	273	273	141	154	526	494	NA
Ethylbenzene	111	111	111	111	169	169	NA
Xylenes	131	131	131	131	175	175	NA
MTBE	378	11,400	3,530	1.41	48,000	18,400	NA
Naphthalene	84	84	73.2	1.61	31.0	10.3	NA

A more detailed presentation of these values is provided in the February 2021 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

ADEM requested a modification of the current CAP that would more aggressively address both soil and groundwater contamination at the site. As part of the CAP Modification, 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 October 23, 2025.

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

Groundwater Monitoring Activities

Personnel from Three Notch mobilized to the site on October 23, 2025, to collect groundwater samples for COCs, 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 the fourteen monitoring and recovery 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 October 23, 2025 groundwater monitoring event, the groundwater flow direction beneath the site is to the southeast. After all measurements were completed, thirteen of the fourteen monitoring wells sampled were properly purged in preparation for groundwater sampling activities. Recovery well RW-3 contained 0.04 feet of free product and was not sampled. Approximately 46 gallons of purge water were removed from the wells, stored in a drum, and treated using a portable carbon unit prior to being discharged on-site. 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 thirteen monitoring wells for BTEX/MTBE/Naphthalene analyses using new, disposable bailers and transferred to 40 mL glass VOA vials preserved with HCl. The 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 SSTLs for GRP in two (RW-1 and RW-4) of the thirteen sampled

monitoring wells. All COC concentrations were reported to be below 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>
RW-1	Benzene	0.144 mg/L	55.7 mg/L	0.160 mg/L
RW-4	Benzene	0.435mg/L	55.7 mg/L	7.69 mg/L

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

MODIFIED REMEDIATION RATIONAL AND APPROACH

Based upon current constituent concentrations and the risk assessment results, there are exceedances in the GRP for groundwater COC constituents.

In order to accelerate the reduction of dissolved hydrocarbon concentrations, Three Notch recommends replacing the previous Remediation by Natural Attenuation (RNA) and MEME/AS remedial activities at the site with a more aggressive chemical injection treatment strategy through the use of Cool-Ox® oxidation technology. The injection of Cool-Ox® into the source area to directly attack both soil and groundwater contamination would be an effective means of achieving the site-specific cleanup goals.

Cool-Ox® is a hydrogen peroxide based technology designed to address a wide variety of remedial challenges presented by organic contaminants in various types of soil (especially clay) and groundwater. The unique Cool-Ox® oxidation process is one of the only in situ oxidation reagents that doesn't create heat or corrosion. Unlike Fenton chemistry where liquid hydrogen peroxide is used as the source of the oxidizing radicals, the Coll-Ox® technology uses an aqueous suspension of solid peroxygen compounds. These compounds hydrolyze to generate hydrogen peroxide in the proximity of the contaminants. A key to the success of the technology is that the relative insolubility of these compounds allows the oxidizers to be produced over an extended period of time. This long term production of oxidizer greatly enhances the probability of the oxidizing compounds contacting the contaminants as well as providing an ongoing source of molecular oxygen for the enhancement of the aerobic microbial proliferation.

MODIFIED REMEDIATION RECOMMENDATION PLAN

The proposed corrective action at the site involves the application of the chemical treatment agent Cool-Ox® through a network of injection wells in conjunction with post-injection groundwater monitoring. Three Notch recommends the installation of seven injection (INJ) wells within the source area to be utilized during the chemical injection events. Cool-Ox® will be injected into the proposed INJ wells to provide treatment of both soil and groundwater contamination in the source area. The proposed chemical injection event would be anticipated to reduce the residual COC concentrations within the areas with remaining contamination to levels below the approved SSTLs. Should residual concentration levels remain above SSTLs during the post-injection monitoring period, additional follow-up injections may be required.

The proposed injection wells will be installed using sonic drilling methods or hollow-stem augers to a depth of 25 feet below land surface (ft-bls). The proposed INJ wells will be completed with four-inch diameter schedule 40 PVC and will be screened with a 15-foot section of 0.020-inch slotted well screen placed at a depth of 10 feet to 25 feet. Coarse-grade filter sand (6-20) will be emplaced around the screen, and a bentonite pellet seal will be placed on top of the sand pack. The remainder of the annulus will be sealed with a cement grout mixture. Locking watertight caps will be placed in the top of each well and 8-inch steel manways with bolt down covers will be installed over the casings in a flush mounted concrete pad.

Soil cuttings and construction debris will be placed in a roll-off container and disposed of at a permitted landfill. Three Notch will obtain a new Solid Waste Disposal Permit.

Three Notch will survey the location of each well referenced to site structures and measure the elevation of the wells referenced to a USGS Topographic Map of the location. Each of the newly installed wells will be properly developed using new, disposable plastic bailers. Approximately five well volumes will be removed from each well. Purge water generated from well development activities will be stored in a drum, then treated using a granular activated carbon filtration system prior to being discharged on-site. A sample of the treated water will be collected and analyzed for BTEX/MTBE/Naphthalene analysis by EPA Method 8260B to ensure breakthrough has not occurred. If evidence of free product is observed, purge water will be containerized and disposed of at an approved disposal facility.

Cool-Ox® Injection Events

Acquisition of an underground injection control (UIC) permit will be necessary prior to conducting the injection event. Three Notch will prepare a UIC permit application and submit it to the ADEM Permits Section for review and approval. After the UIC permit is granted, DeepEarth Technologies, Inc (DeepEarth) and Three Notch personnel will mobilize to the site with all necessary materials and equipment to perform the Cool-Ox® injection activities. The remedial activities will consist of injecting a total of approximately 3,500 gallons of Cool-Ox® oxidation agent into the network of seven injection wells at a rate of approximately 500 gallons of injectate per well. The estimated onsite time for completion of these activities is four days.

Post-Injection Monitoring

Groundwater samples will be collected quarterly from all site monitoring and recovery wells. The groundwater samples will be collected from the wells using new, clean plastic bailers and transferred to 40 mL glass VOA vials preserved with HCl for BTEX/MTBE/Naphthalene analysis using EPA Method 8260B. Additional samples as required to meet the monitoring terms per the UIC permit requirements will also be collected. During each groundwater sampling event, all wells will also be monitored for natural attenuation parameters (DO, pH, and ORP).

Once the COC concentrations are reduced to below the SSTLs, corrective action activities will be discontinued, and re-bound monitoring will be initiated. Should the COC concentrations remain above the SSTLs after a two-year period, Three Notch will re-evaluate the corrective action plan and additional injection activities may be recommended. Three Notch will recommend the site for No Further Action (NFA) status once remediation goals are met.

PROPOSED REPORTING REQUIREMENTS

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

Reporting of CAP Implementation

This report will detail installation of the nine injection wells and completion of the Cool-Ox® injection activities. Newly installed injection wells and subsequent disposal information will be included with a summary of the injection activities performed.

Reporting of Post-Injection Monitoring with Treatment Effectiveness

Three Notch proposes to submit quarterly Post-Injection GW Monitoring reports which will summarize field activities and the progress of site groundwater constituent concentrations towards achieving approved corrective action levels. The following data will be included in each report: field activities performed, groundwater elevations, groundwater analytical results as compared to target levels, potentiometric surface maps, COC contour maps, and UIC permit monitoring data results. The reports will also include remediation effectiveness and recommendations concerning additional measures deemed necessary.

Request for Closure Evaluation of Corrective Action

This report will include data that demonstrates that remediation goals have been achieved and will request a status of NFA for the site. Methods of abandonment of monitoring and recovery wells will be described.

Well Abandonment

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

SCHEDULE OF IMPLEMENTATION

It is anticipated that the proposed modified corrective action plan will begin with the injection event following the approval of the modified CAP and the approval of the UIC permit. The following schedule indicates the timetable for major project events to be completed as part of this corrective action plan modification:

Months Following Modified CAP Approval	Project Event	Project Event Length
1	Well Installation	1 Week
2	Cool-Ox® Injection Activities	1 Week
0-24	Quarterly GWM events, evaluation of performance, and recommendations for further corrective action if required	2 Years
25	Well abandonment; completion and submittal of final report if allowable by ADEM	2 Months

PROPOSED SAMPLING AND MONITORING ACTIVITIES

Following the approval of the Modified CAP and UIC Permit, well installation activities for the seven injection wells will be initiated. After the injection wells are completed, the Cool-Ox® injection activities will be scheduled. These activities will consist of the introduction of a total of approximately 3,500 gallons of Cool-Ox® oxidant agent into the source area of the site associated contaminant plume at the rate of approximately 500 gallons per each of the seven injections wells over an estimated period of four days. These injection activities will be conducted by DeepEarth Technologies, Inc with oversight and assistance from Three Notch.

Once per quarter, groundwater samples will be collected from all monitoring and recovery wells. The groundwater samples will be collected from the monitoring and recovery wells using new, clean plastic bailers and transferred to 40 mL glass VOA vials preserved with HCl for BTEX/MTBE/Naphthalene analysis in accordance with EPA Method 8260B. Additional samples specified to meet the requirements of the UIC permit will also be collected. During each groundwater sampling event, all monitoring wells will also be sampled for natural attenuation parameters (DO, pH, ORP). The natural attenuation parameters will provide information concerning the recovery of the shallow aquifer down gradient of the release area.

The results of the proposed activities will be submitted to ADEM in the form of a Post-Injection Groundwater Monitoring Report. The report will include conclusions regarding the effectiveness of the remedial activities performed and recommendations for future site activities.

Cost proposals for Cap Implementation (injection well installation, UIC permit, and Cool-Ox® injection activities (CP-27) and quarterly post-injection groundwater monitoring events (CP-28, CP-29, CP-30, and CP-31) will be submitted to ADEM under separate cover.

APPENDICES

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APPENDIX A

Monitoring Point Data Summary Table

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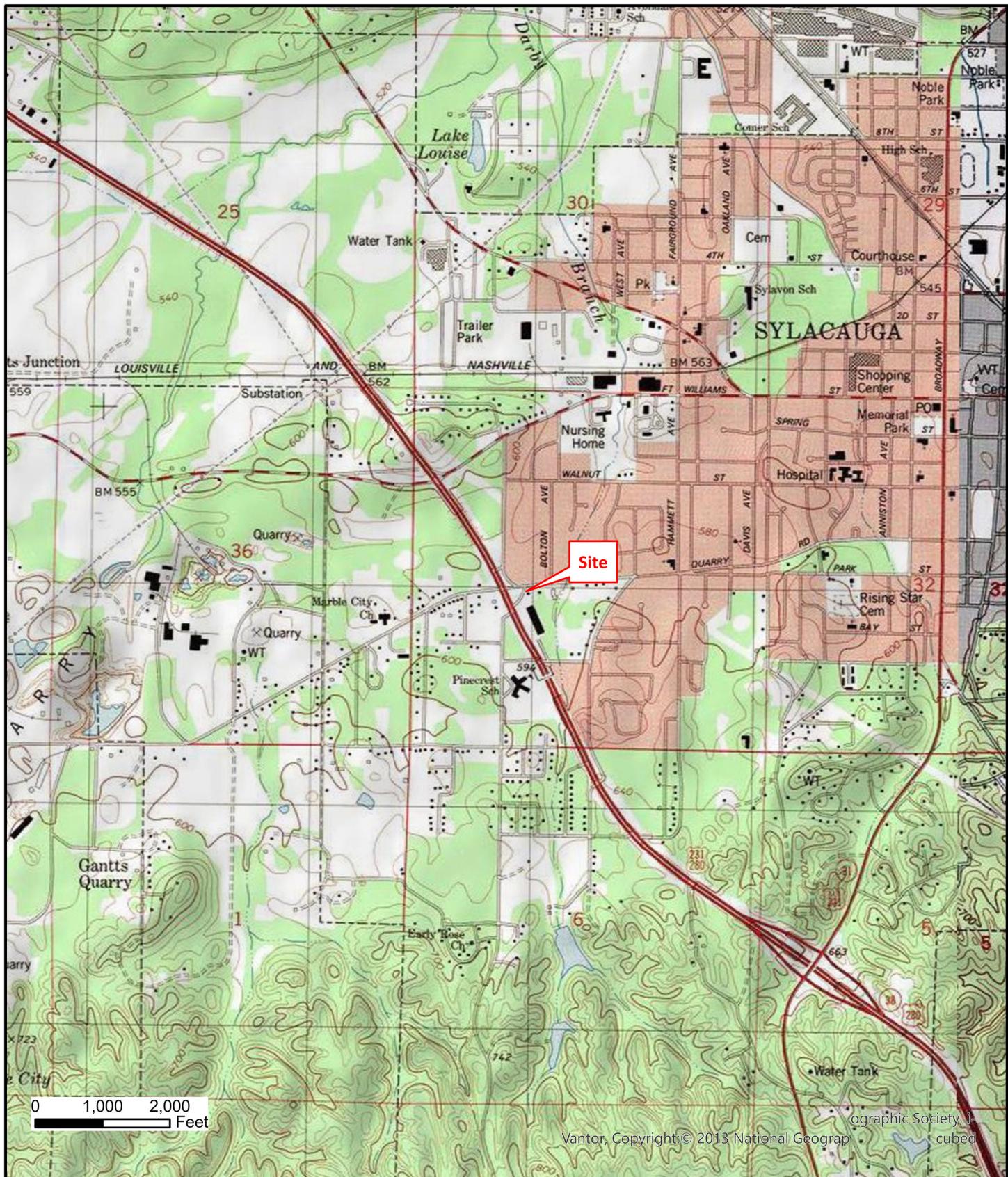
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FIGURES

APPENDIX B

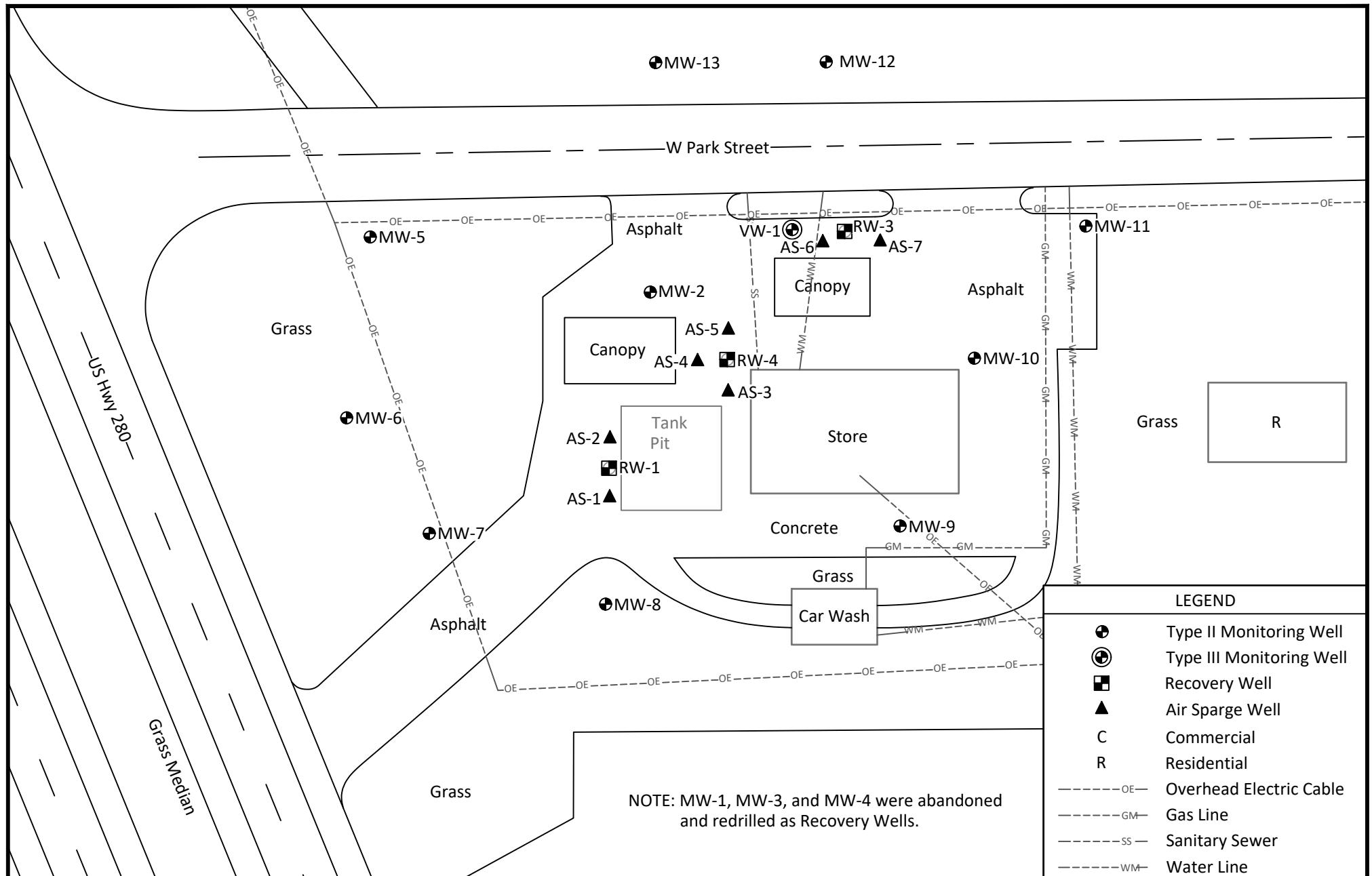


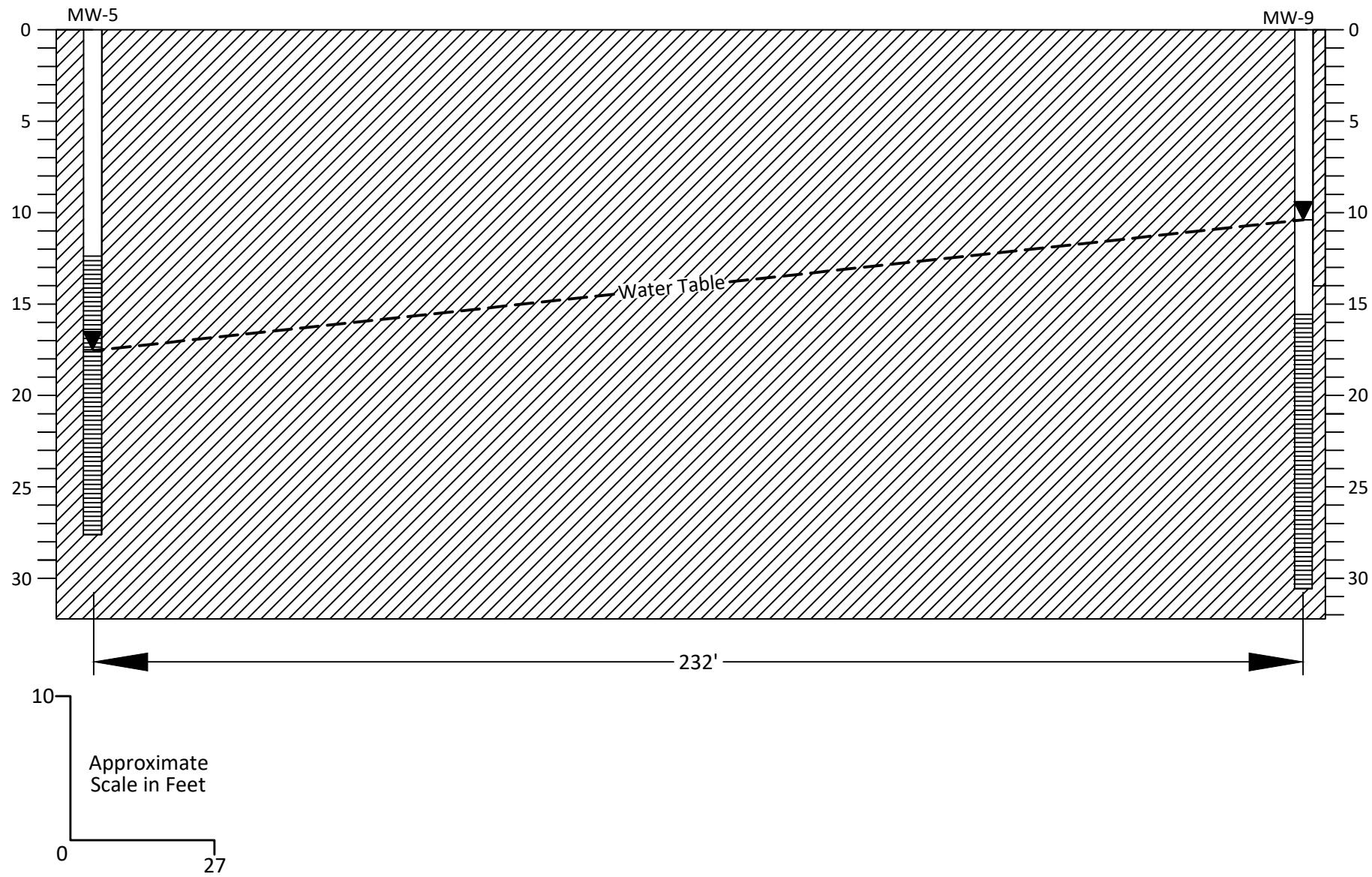
THREE NOTCH GROUP

Site Location USGS Topographic Map

Shop-N-Fill #9 Chevron
1207 W Park Street
Sylacauga, Talladega County, AL

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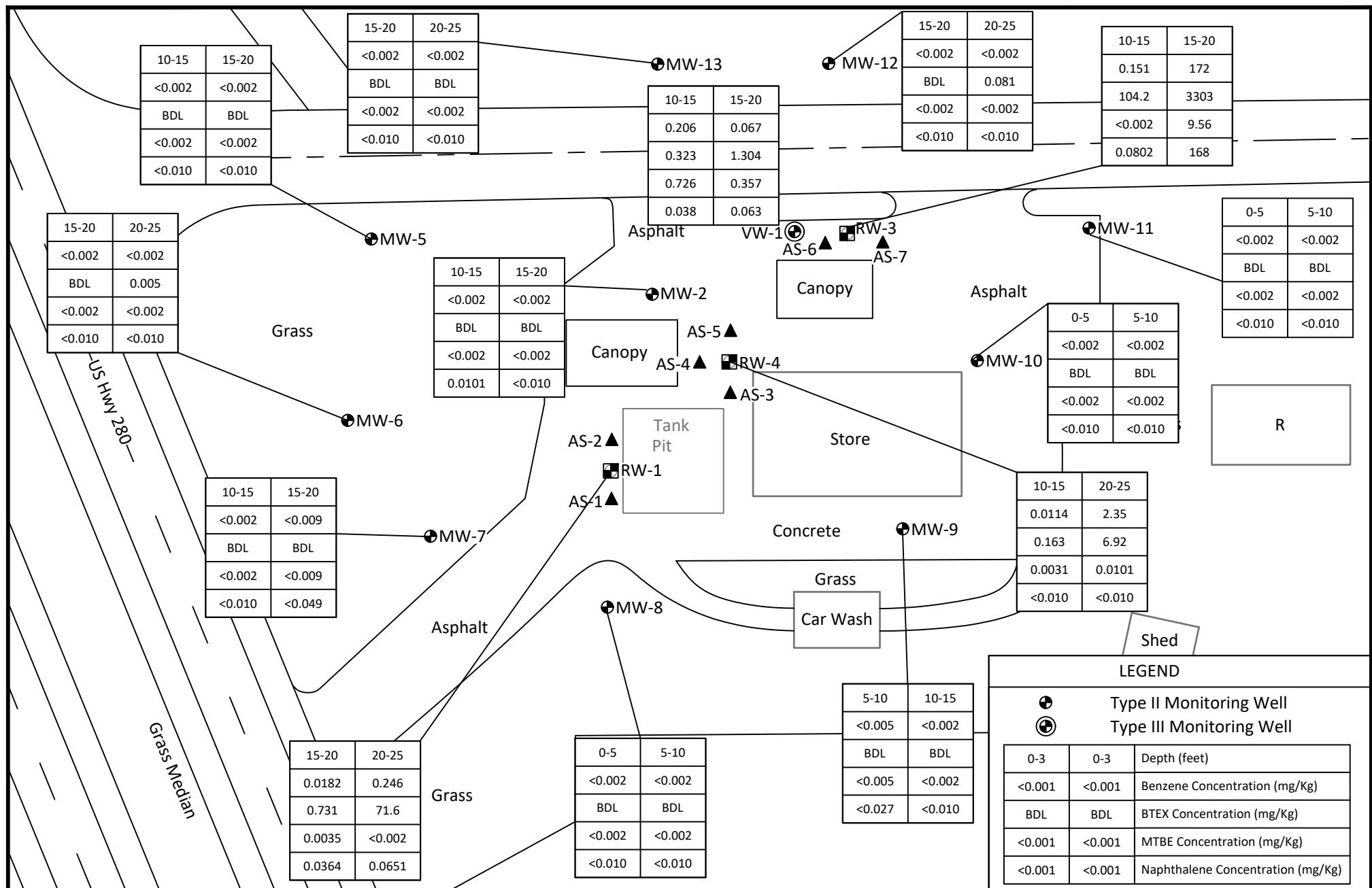
 **THREE
NOTCH
GROUP**

Lithologic Cross-Section

Shop-N-Fill #9 Chevron
1207 W Park Street
Sylacauga, Talladega County, AL

Legend

	Clay
	Screened Interval
	Groundwater Level



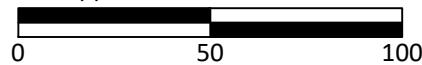
THREE NOTCH GROUP

Soil Analytical Map

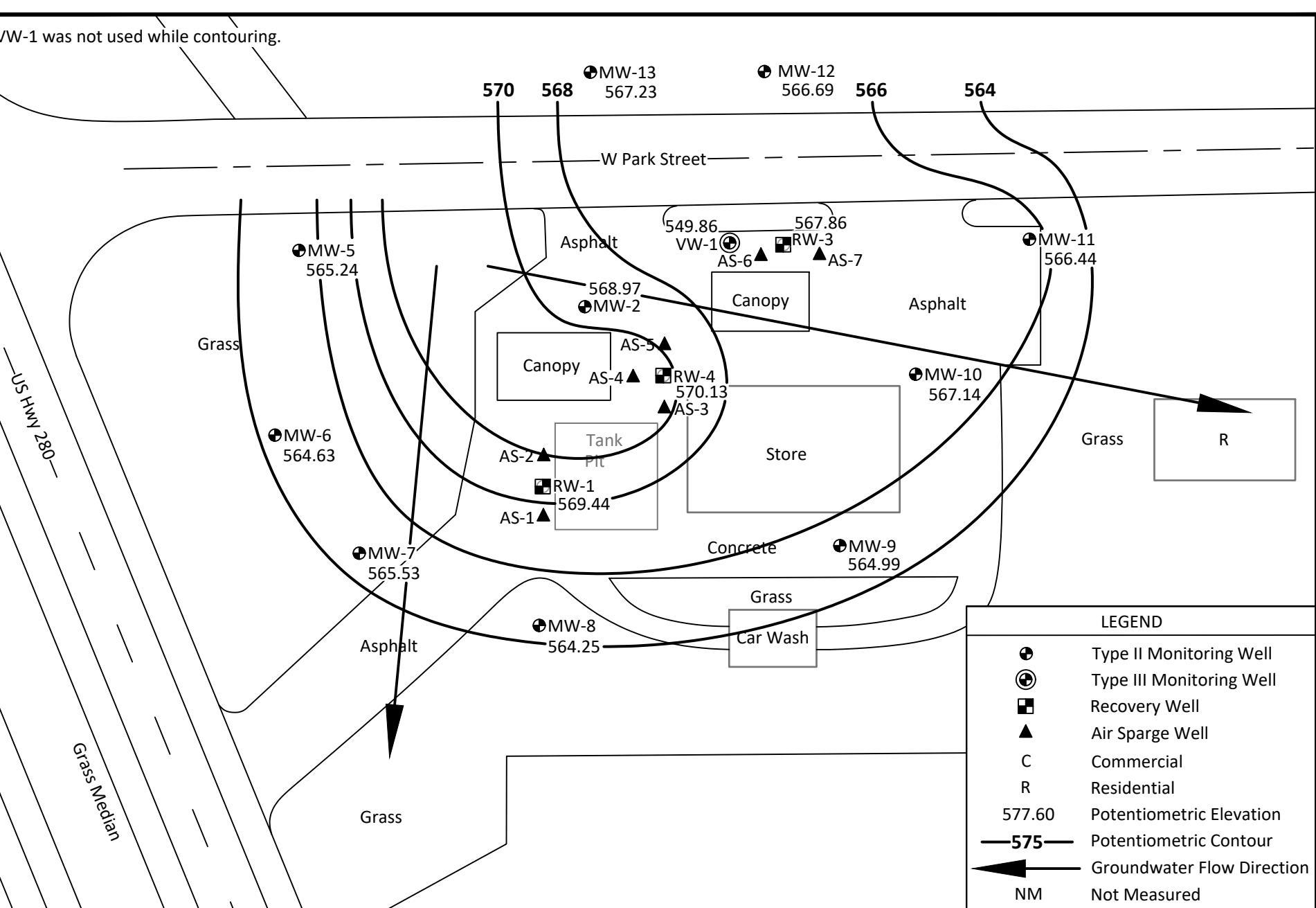
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1207 W Park Street
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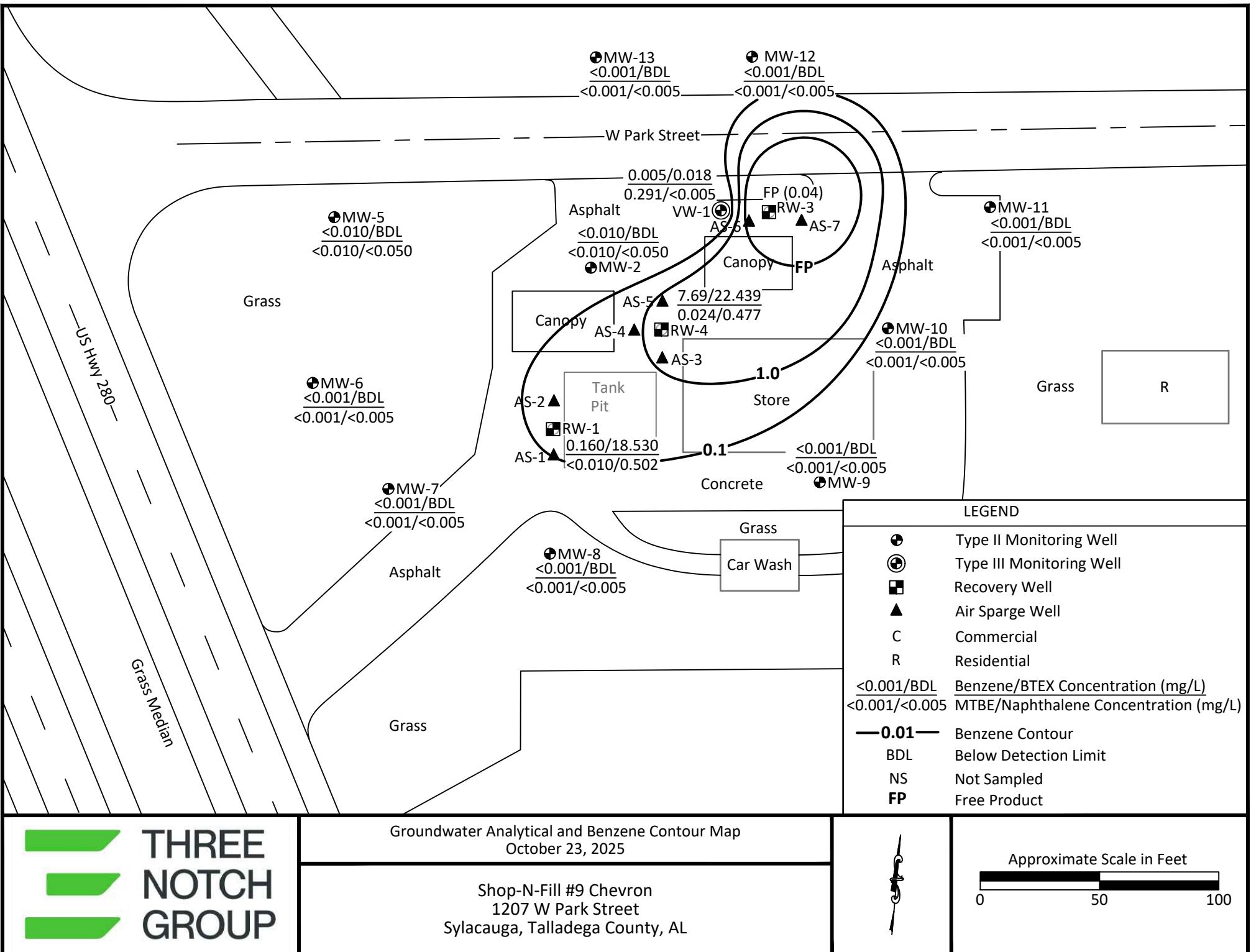


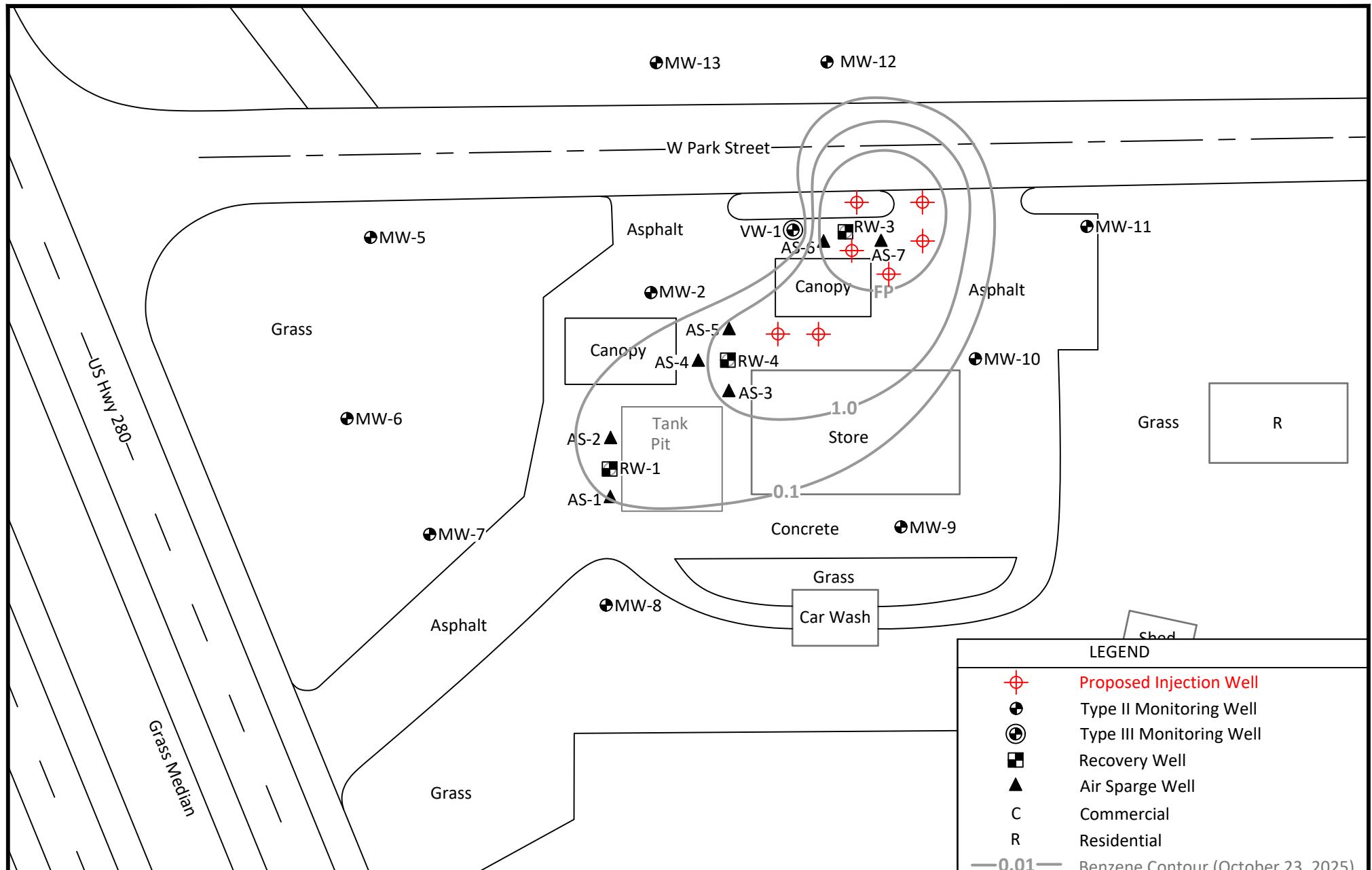
Approximate Scale in Feet

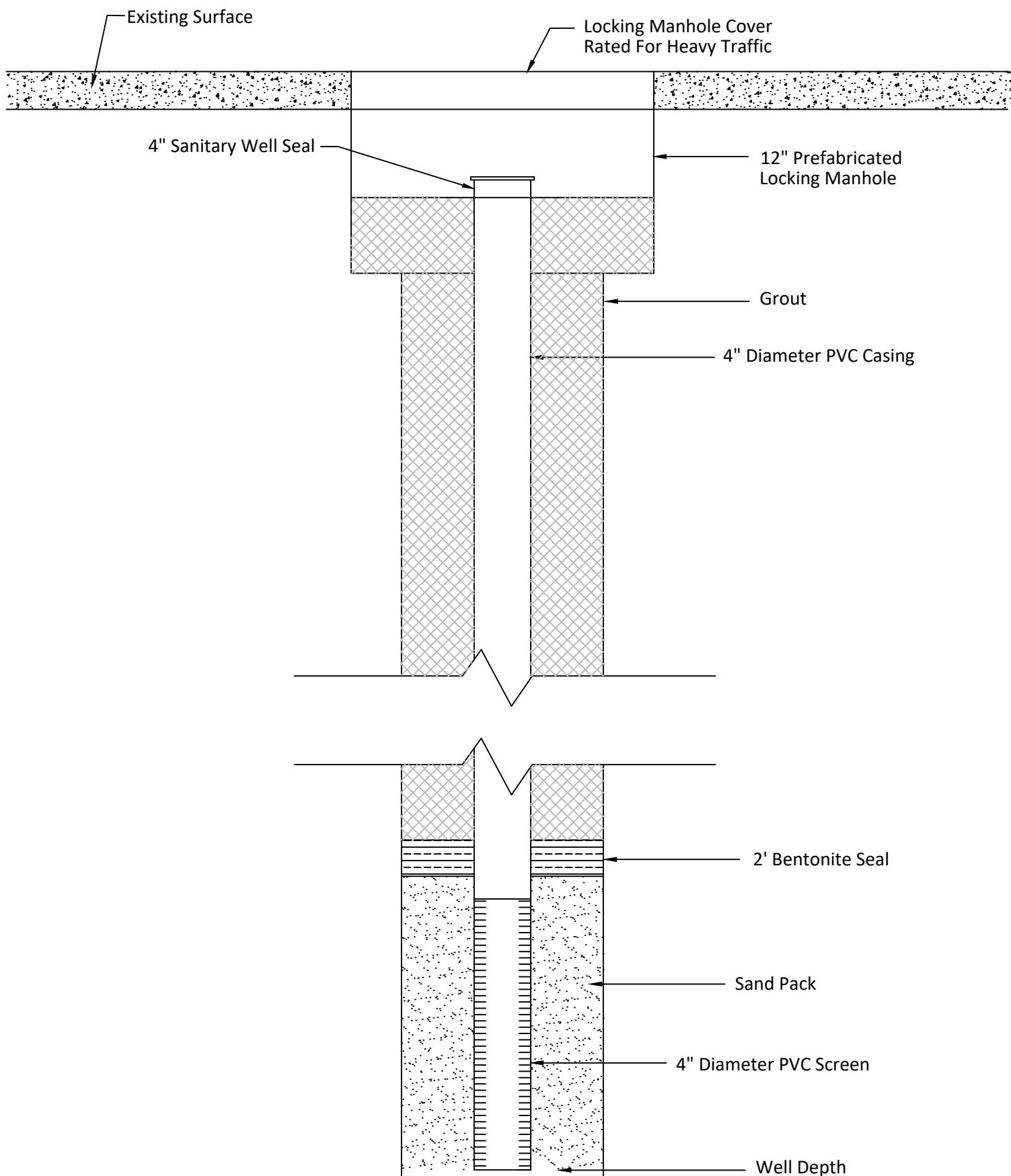


NOTE: VW-1 was not used while contouring.









Injection Well Construction Detail

Shop-N-Fill #9 Chevron
1207 W Park Street
Sylacauga, Talladega County, AL

NOT TO SCALE

DEEPEARTH TECHNOLOGIES, INC.

PROPOSAL



APPENDIX C



DTI Field Services Group - Summary Sheet for Cool-Ox® Application

Three Notch Group, Inc. Site: Shop N Fill #9 Chevron 11/24/2025
1962 West Main Street 1207 West Park Street
Dothan, AL 36301 Sylacauga, AL DTI Job #: Q2980 (7Wells)

Attention: Alec Black Phone: 334-797-9869

DeepEarth Technologies, Inc., is pleased to submit this proposal for Cool-Ox® remediation of subject site:

Contaminants: BTEX/Naphthalene
Media Treated: Soil & GW
Vertical Extent (feet bgl): Well screen
Depth to Groundwater (feet bgl): 15 NA
Number of Wells: 7
Estimated Total Gals*: up to 3500
Gals Per Well*: up to 500
Est. On-Site Days to Complete: 4
Lump Sum Price: \$ **69,365**

Conditions of Quote:

- 1) All quotes shall remain in effect for a period of sixty (60) days only. Expired quotes must be renegotiated prior to the beginning of work.
- 2) The Client shall:
 - a) Arrange for a suitable water source at the site.
 - b) Arrange for the locating and marking of all underground utilities and structures including GPR. DTI shall not be liable for any damage to such utilities or structures not clearly identified and revealed to DTI.
 - c) Secure all permits necessary for the legal commencement of work and right of entry to the site.
 - d) If necessary, complete any and all coring of paved surfaces prior to the commencement of work.
 - e) Pay DTI for all work completed within 30 days of receipt of DTI invoice. For projects in excess of \$200,000 a minimum deposit in the amount of 1/3 of the quoted price will be required prior to the commencement of work to cover a portion of the materials and mobilization costs.
If payment is not received within 30 days of receipt of DTI invoice, a late payment fee of 1.5% per month will be charged.
 - f) Notify DTI if any additional on site health and safety training classes are required 30 days prior to job start.
 - g) Provide copies of all analytical data derived from samples collected prior to (to establish baseline data), during, and for three years after the completion of the remedial application. This data shall be considered confidential and used to evaluate and improve the Cool-Ox® technology.
- 3) Assumptions:
 - a) No work shall be conducted in inclement weather such as lightning storms, freezing conditions, excessive rain or snow. The Stand-by daily rate, if applicable, shall be that rate stated in the work order.
 - b) All quotes are based upon an eight (8) hour work day.
 - c) In offering this quote, DTI does not warrant or imply that the site shall be remediated to closure standards by a single application of the Cool-Ox® technology.
 - d*) If the amount of reagent applied is less than the Estimated Total Gallons, a discount in the Lump Sum Price will not be provided. The Lump Sum Price includes time, labor and equipment. The Estimated Total Gallons states the maximum amount that could be applied at the above mentioned site. Each Well may not accept the prescribed Gallons Per Well. Therefore, in some instances, it will not be possible for the Estimated Total Gallons to be applied.

4) Site Specific Provisions:

- a) This estimate includes all costs for material, labor and equipment for injections. Changes to the scope may be made in the field by DTI to account for unknowns or changes in the site conditions.
- b) If a larger treatment area or additional reagent is required to adequately treat the site, a change order shall be executed by the client prior to the initiation of additional work.

5) Ownership of Documents, Patents, and Copyrights:

Client understands and agrees that the primary reason Client is contracting with DTI is to secure the services and knowledge of DTI to provide Client with in-situ or ex-situ remediation of contaminants employing technology and application methods developed and provided by DTI. Client further understands and agrees that in the broadest definition of the term, the "craft" of DTI is providing, developing and improving the technology for the exclusive commercial or other use of DTI and that all intellectual property developed in the performance of any and all Work performed by DTI for Client or its clients, including, without limitation, all drawings, specifications, reports, summaries, samples, photographs, memoranda, notes, calculations, and other documents collected or prepared by DTI, shall be deemed the exclusive property of DTI.

We at DTI wish to thank you for your consideration of our company as your in-situ chemical oxidation remedial contractor. If you have any questions regarding the technology or the information contained in this proposal, please contact us immediately. If you are in agreement with the proposal and wish to proceed with the project by reserving a work schedule date, please sign below and return this form to us.

Sincerely,

William L. Lundy, Sr. V.P.

DeepEarth Technologies, Inc.

Accepted:

Name and Title: _____

Order Number: _____ Date: _____

QUALITY ASSURANCE QUALITY CONTROL PLAN



APPENDIX D

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 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 CDG 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 in to 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 containerized on-site in labeled 55-gallon drums. PCW will be removed periodically from the site to an appropriate disposal/treatment/recycling facility approved by the ADEM. Records will be maintained as to the volume of PCW accumulated at the site, and identification labels will be affixed to PCW containers. Prior to disposal, samples will be collected and analyzed as required by the ADEM and the disposal/treatment/recycling facility. No waste will be removed from the site without ADEM knowledge/approval.

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 BTEX/MTBE and naphthalene analysis (volatile organics) 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 (volatile) analysis. The preservation employed for BTEX/MTBE (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 CDG, 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



APPENDIX E

Site Health and Safety Plan

**Shop N Fill #9 Chevron
Facility ID# 10642-121-005311
UST No. 19-07-06**

Prepared For:
**Bowden Oil Company
P.O. Box 145
Sylacauga, AL 35150**

Prepared By:
**Three Notch Group, Inc.
700 Southgate Drive, Suite A
Pelham, AL 35124**



**THREE
NOTCH
GROUP**

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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 Shop N Fill #9 Chevron site located in Sylacauga, Talladega 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	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.

Chad Elliott	Project Manager / Site HSO	Performs all field activities and is responsible for recognizing site hazards and reporting hazard incidents to Corporate HSO.
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4.0 Scope of Work

Work to be performed may include installation and chemical injection activities.

4.1 Installation Activities

Installation activities generally involve preparing the site for installation activities and also the construction of the MEME manifold onsite. More specifically this may include:

- Preparing the site for work to be performed
- Saw-cutting concrete surface, excavating, and installing well vaults
- Installing polyvinyl chloride (PVC) extraction piping
- Installing piping connections from extraction piping to wellhead

5.0 Chemical Hazards

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

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. The Safety Data Sheet (SDS) is attached to this Health & Safety Plan.

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.
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 hazards 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 attached to this Health & Safety 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 conditions; 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 OHSA.

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

TEMPERATURE HAZARDS	SYMPTOMS	TREATMENT
		<p>minutes. Once temperature remains lowered, dry person off. Use fans or air conditioning, if available. Do not give the victim stimulants.</p> <p>Transfer to medical facility.</p> <p>Under no condition is the victim to be left unattended unless authorized by a physician.</p>

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 land surface (ft-bls).

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 field 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		911
Police Department		911
Ambulance		911
Hospital		1-256-737-2000
Corporate HSO	David Dailey	1-205-403-2600
Project Manager	Alecia Hamilton	1-256-310-9778
EPA RCRA-Superfund Hotline		1-800-424-9346
Chemtrec (24 hours)		1-800-424-9300
Bureau of Explosives (24 hours)		1-202-293-4048
Centers for Disease Control (Biological Agents)		1-404-633-5353
National Response Center		1-800-424-8802

11.8 Medical Facility

Name of Hospital: Coosa Valley Medical Center

Address: 315 West Hickory St, Sylacauga, AL 35150

Phone: 256-401-4000

Route to Hospital: see attached map with driving directions

Travel Time from Site: 4 minutes

Distance to Hospital: 1.87 miles

Name/Number of 24-hour Ambulance Service: 911

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

1207 W Park St
to Coosa Valley Medical Center

 **4 min** (1.87 miles)

via W Fort Williams St and CR-511

 **A** Start
1207 W Park St

 Head toward Coaling Rd on W Park St.

Go for 318 ft.

 Turn right onto Jim Nabors Hwy (US-231 N/US-280 W).

Go for 0.3 mi.

 Turn right onto W Fort Williams St.

Go for 1.3 mi.

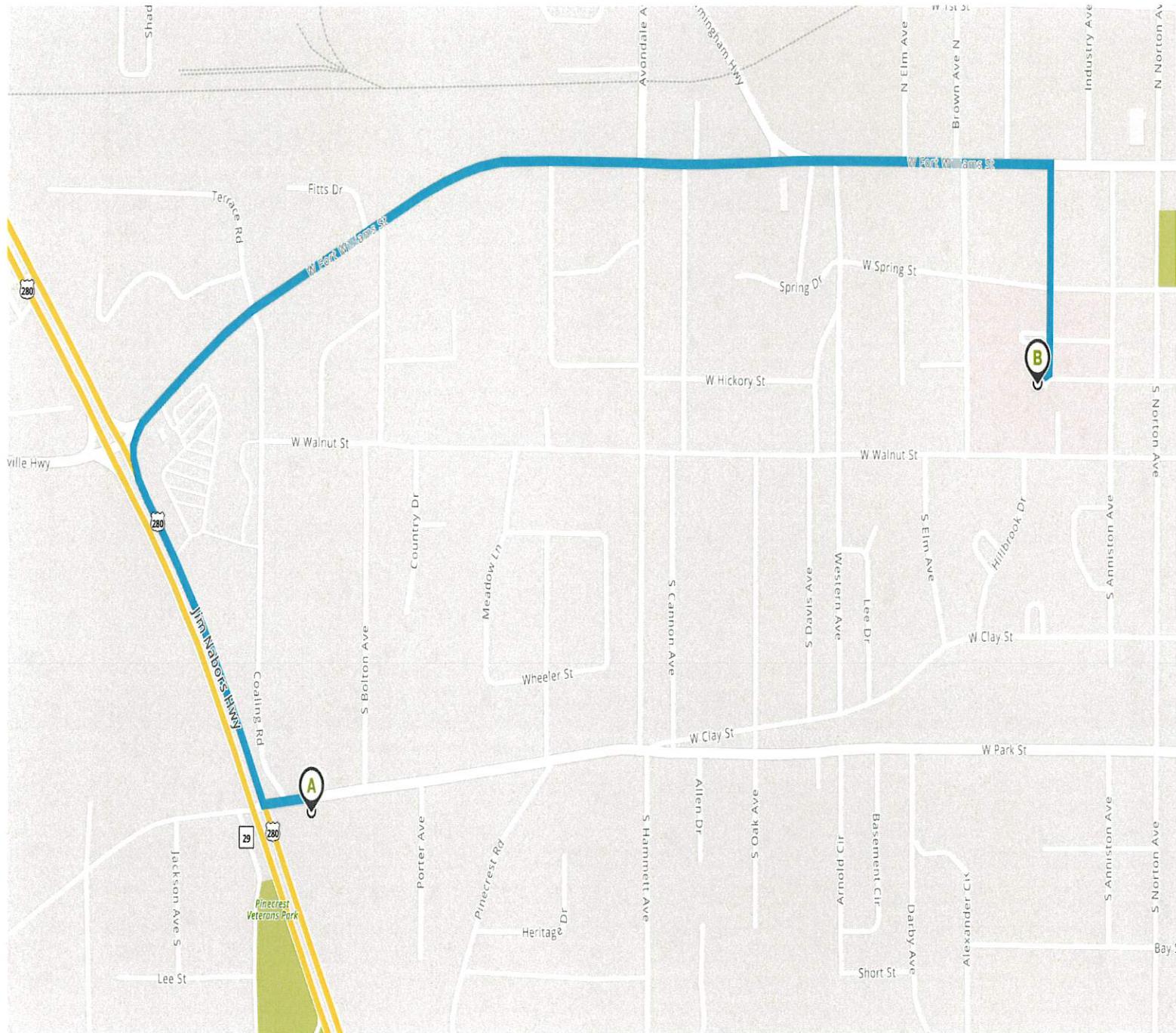
 Turn right onto S Douglas Ave.

Go for 0.2 mi.

 Turn right.

Go for 164 ft.

 **B** End at
Coosa Valley Medical Center
315 W Hickory St, Sylacauga, AL 35150



Hotels



Food



Shopping



Coffee



Grocery



Gas

Advertisement

ADEM FORMS



APPENDIX F

UST RELEASE FACT SHEET

GENERAL INFORMATION:

SITE NAME: Shop N Fill #9 Chevron

ADDRESS: 1207 W Park Street, Sylacauga, Talladega County, Alabama

FACILITY I.D. NO.: 10642-121-005311

UST INCIDENT NO.: UST19-07-06

RESULTS OF EXPOSURE ASSESSMENT:

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

None

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

None

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 { X } No

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

{ } Yes { X } No

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

{ } Yes { X } No

Have surface waters been impacted by the release?

{ } Yes { X } No

Is there an imminent threat of contamination to surface waters?

{ } Yes { X } No

What is the type of surrounding population?

Commercial/Residential

CONTAMINATION DESCRIPTION:

Type of contamination at site: { X } Gasoline, { } Diesel, { } Waste Oil
{ } Kerosene, { } Other _____

Free product present in wells? { X } Yes { } No Maximum thickness measured: 0.07 ft MW-3 6/8/20

Maximum BTEX concentrations measured in soil: 3303 mg/kg in MW-3 (15-20 ft-bls)

Maximum BTEX concentrations measured in groundwater: 120.46 mg/L in MW-3 9/20/19

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:	Shop N Fill #9 Chevron
SITE ADDRESS:	1207 West Park Street
	Sylacauga, Talladega County, Alabama
FACILITY I.D. NO.:	10642-121-005311
UST INCIDENT NO.:	UST19-07-06
OWNER NAME:	Bowden Oil Company
OWNER ADDRESS:	P.O. Box 145
	Sylacauga, AL 35150
NAME & ADDRESS OF PERSON COMPLETING THIS FORM:	Alecia Hamilton Three Notch Group, Inc. 700 Southgate Drive, Suite A Pelham, AL 35124

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 checked="" type="checkbox"/>	<input 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



APPENDIX G

TASK PERFORMANCE SUMMARY

CAP Modification

December 2025 (CP-26)

Shop N Fill #9 Chevron

1207 West Park Street

Sylacauga, Talladega 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/ Review
Alec Black, PG					X		X	
Michelle Grantham, PM	X		X					X
David Dailey, PE							X	
Alecia Hamilton, PM	X		X					X
John David Galloway, ES/Tech								
Evan Morrison, Tech								
Ray Hollinghead, Drafter						X		
James Arnold, Drafter								
Karen Moore, Admin/Drafter								
Michelle Wilson, Admin								
Kim Ballard, Admin			X					
Leigh Caylor, Admin								X
Patricia Horwath, Admin								X
LeeAnn Wagner, Admin			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