Edward F. Poolos
Director

Jeffery W. Kitchens
Deputy Director

Kay Ivey
Governor

Alabama Department of Environmental Management
adem.alabama.gov
1400 Coliseum Blvd. 36110-2400 ▪ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ▪ FAX (334) 271-7950

JAN 15 2026

MR. PHILLIP STARRETT
GENERAL MANAGER
WEST FRASER US EWP LLC
4400 BARTON INDUSTRIAL BLVD
LANETT, AL 36863

RE: REVISED DRAFT PERMIT
NPDES PERMIT NUMBER AL0084491

Dear Mr.Starrett:

Transmitted herein is a revised draft of the referenced permit.

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

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

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

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

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

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

If you have questions regarding this permit or monitoring requirements, please contact Victoria Kim by e-mail at **victoria.kim@adem.alabama.gov** or by phone at **(334) 271-7895.**

Sincerely,

Scott Jackson, Chief
Industrial Section
Industrial/Municipal Branch
Water Division

Enclosure: Draft Permit

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

Birmingham Office
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Office
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Coastal Office
1615 South Broad Street
Mobile, AL 36605
(251) 450-3400
(251) 479-2593 (FAX)

ADEM
Alabama Department of Environmental Management

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE: WEST FRASER US EWP LLC

FACILITY LOCATION: WEST FRASER HUGULEY
4400 BARTON INDUSTRIAL BLVD
LANETT, ALABAMA 36863
CHAMBERS COUNTY

PERMIT NUMBER: AL0084491

RECEIVING WATERS: 001 - UNNAMED TRIBUTARY TO LITTLE OSANIPPA CREEK

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

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:

Revised DRAFT

Alabama Department of Environmental Management
Water Division Chief

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PART I: DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

DSN0011: Process wastewater, boiler blowdown, and stormwater associated with Oriented Strand Board (OSB) manufacturing operations.

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

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Oxygen, Dissolved (DO) (00300) Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	*****	mg/l	2X Monthly	Grab	All Months
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months
pH (00400) Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	8.5 Maximum Daily	S.U.	2X Monthly	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	15 Maximum Daily	mg/l	2X Monthly	Grab	All Months
Nitrogen, Ammonia Total (As N) (00610) Effluent Gross Value	*****	*****	*****	*****	2 Monthly Average	3 Maximum Daily	mg/l	2X Monthly	Grab	All Months
Nitrogen, Kjeldahl Total (As N) (00625) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	Apr, May, Jun, Jul, Aug, Sep, Oct
Nitrite Plus Nitrate Total 1 Det. (As N) (00630) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	Apr, May, Jun, Jul, Aug, Sep, Oct
Phosphorus, Total (As P) (00665) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	Apr, May, Jun, Jul, Aug, Sep, Oct

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

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

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

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

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

DSN0011 (Continued): Process wastewater, boiler blowdown, and stormwater associated with Oriented Strand Board (OSB) manufacturing operations.

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

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Carbon, Tot Organic (TOC) (00680) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months
Copper, Total (As Cu) (01042) Effluent Gross Value	*****	*****	*****	*****	0.0127 Monthly Average	0.0180 Maximum Daily	mg/l	2X Monthly	Grab	All Months
Lead, Total Recoverable (01114) Effluent Gross Value	*****	*****	*****	*****	0.0057 Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	*****	*****	*****	*****	2X Monthly	Measured	All Months
BOD, Carbonaceous 05 Day, 20C (80082) Effluent Gross Value	*****	*****	*****	*****	4 Monthly Average	6 Maximum Daily	mg/l	2X Monthly	Grab	All Months

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

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

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

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

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

B. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS

1. Representative Sampling

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

2. Test Procedures

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

a. For parameters with an EPA established Minimum Level (ML), report the measured value if the analytical result is at or above the ML and report "0" for values below the ML. Test procedures for the analysis of pollutants shall conform to 40 CFR Part 136 and guidelines published pursuant to Section 304(h) of the FWPCA, 33 U.S.C. Section 1314(h). If more than one method for analysis of a substance is approved for use, a method having a minimum level lower than the permit limit shall be used. If the minimum level of all methods is higher than the permit limit, the method having the lowest minimum level shall be used and a report of less than the minimum level shall be reported as zero and will constitute compliance; however, should EPA approve a method with a lower minimum level during the term of this permit the permittee shall use the newly approved method.

b. For pollutants parameters without an established ML, an interim ML may be utilized. The interim ML shall be calculated as 3.18 times the Method Detection Level (MDL) calculated pursuant to 40 CFR Part 136, Appendix B.

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

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

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

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

3. Recording of Results

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

a. The facility name and location, point source number, date, time and exact place of sampling;

b. The name(s) of person(s) who obtained the samples or measurements;

c. The dates and times the analyses were performed;

d. The name(s) of the person(s) who performed the analyses;

e. The analytical techniques or methods used, including source of method and method number; and

f. The results of all required analyses.

4. Records Retention and Production

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

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

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

5. Monitoring Equipment and Instrumentation

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

C. DISCHARGE REPORTING REQUIREMENTS

1. Reporting of Monitoring Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(3) If a permittee is allowed to submit a hard copy DMR, the DMR must be legible and bear an original signature. Photo and electronic copies of the signature are not acceptable and shall not satisfy the reporting requirements of this permit.

(4) If the permittee, using approved analytical methods as specified in Provision I.B.2, monitors any discharge from a point source for a limited substance identified in Provision I.A. of this permit more frequently than required by this permit, the results of such monitoring shall be included in the calculation and reporting of values on the DMR and the increased frequency shall be indicated on the DMR.

(5) In the event no discharge from a point source identified in Provision I.A. of this permit and described more fully in the permittee's application occurs during a monitoring period, the permittee shall report "No Discharge" for such period on the appropriate DMR.

d. All reports and forms required to be submitted by this permit, the AWPCA and the Department's Rules, shall be electronically signed (or, if allowed by the Department, traditionally signed) by a "responsible official" of the permittee as defined in ADEM Administrative Code Rule 335-6-6-.09 or a "duly authorized representative" of such official as defined in ADEM Administrative Code Rule 335-6-6-.09 and shall bear the following certification:

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

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

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

Certified and Registered Mail containing Discharge Monitoring Reports shall be addressed to:

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

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

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

Certified and Registered Mail shall be addressed to:

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

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

2. Noncompliance Notification

a. 24-Hour Noncompliance Reporting

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

(1) does not comply with any daily minimum or maximum discharge limitation for an effluent characteristic specified in Provision I. A. of this permit which is denoted by an "(X)";

(2) threatens human health or welfare, fish or aquatic life, or water quality standards;

(3) does not comply with an applicable toxic pollutant effluent standard or prohibition established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a);

(4) contains a quantity of a hazardous substance which has been determined may be harmful to public health or welfare under Section 311(b)(4) of the FWPCA, 33 U.S.C. Section 1321(b)(4);

(5) exceeds any discharge limitation for an effluent characteristic as a result of an unanticipated bypass or upset; and

(6) is an unpermitted direct or indirect discharge of a pollutant to a water of the state (unpermitted discharges properly reported to the Department under any other requirement are not required to be reported under this provision).

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

b. If for any reason, the permittee's discharge does not comply with any limitation of this permit, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c below, such report shall be submitted with the next Discharge Monitoring Report required to be submitted by Part I.C.1 of this permit after becoming aware of the occurrence of such noncompliance.

c. Any written report required to be submitted to the Director or Designee by Part I.C.2 a. or b. shall be submitted using a Noncompliance Notification Form (ADEM Form 421) available on the Department's website (http://adem.alabama.gov/DeptForms/Form421.pdf) and include the following information:

(1) A description of the discharge and cause of noncompliance;

(2) The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and

(3) A description of the steps taken and/or being taken to reduce or eliminate the noncomplying discharge and to prevent its recurrence.

D. OTHER REPORTING AND NOTIFICATION REQUIREMENTS

1. Anticipated Noncompliance

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

2. Termination of Discharge

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

3. Updating Information

a. The permittee shall inform the Director of any change in the permittee's mailing address, telephone number or in the permittee's designation of a facility contact or office having the authority and responsibility to prevent and abate violations of the AWPCA, the Department's Rules, and the terms and conditions of this permit, in writing, no later than ten (10) days after such change. Upon request of the Director or his designee, the permittee shall furnish the Director with an update of any information provided in the permit application.

b. If the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information with a written explanation for the mistake and/or omission.

4. Duty to Provide Information

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

5. Cooling Water and Boiler Water Additives

a. The permittee shall notify the Director in writing not later than thirty (30) days prior to instituting the use of any biocide corrosion inhibitor or chemical additive in a cooling or boiler system, not identified in the application for this permit, from which discharge is allowed by this permit. Notification is not required for additives that do not contain a heavy metal(s) as an active ingredient and that pass through a wastewater treatment system prior to discharge nor is notification required for additives that should not reasonably be expected to cause the cooling water or boiler water to exhibit toxicity as determined by analysis of manufacturer's data or testing by the permittee. Such notification shall include:

(1) name and general composition of biocide or chemical;

(2) 96-hour median tolerance limit data for organisms representative of the biota of the waterway into which the discharge will ultimately reach;

(3) quantities to be used;

(4) frequencies of use;

(5) proposed discharge concentrations; and

(6) EPA registration number, if applicable.

b. The use of a biocide or additive containing tributyl tin, tributyl tin oxide, zinc, chromium or related compounds in cooling or boiler system(s), from which a discharge regulated by this permit occurs, is prohibited except as exempted below. The use of a biocide or additive containing zinc, chromium or related compounds may be used in special circumstances if (1) the permit contains limits for these substances, or (2) the applicant demonstrates during the application process that the use of zinc, chromium or related compounds as a biocide or additive will not pose a reasonable potential to violate the applicable State water quality standards for these substances. The use of any additive, not identified in this permit or in the

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

6. Permit Issued Based on Estimated Characteristics

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

b. This permit shall be reopened if required to address any new information resulting from the completion and submittal of the Form 2C and or 2F.

E. SCHEDULE OF COMPLIANCE

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

COMPLIANCE SHALL BE ATTAINED ON THE EFFECTIVE DATE OF THIS PERMIT

2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

PART II: OTHER REQUIREMENTS, RESPONSIBILITIES, AND DUTIES

A. OPERATIONAL AND MANAGEMENT REQUIREMENTS

1. Facilities Operation and Maintenance

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

2. Best Management Practices

a. Dilution water shall not be added to achieve compliance with discharge limitations except when the Director or his designee has granted prior written authorization for dilution to meet water quality requirements.

b. The permittee shall prepare, implement, and maintain a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 C.F.R. Section 112 if required thereby.

c. The permittee shall prepare, submit for approval and implement a Best Management Practices (BMP) Plan for containment of any or all process liquids or solids, in a manner such that these materials do not present a significant potential for discharge, if so required by the Director or his designee. When submitted and approved, the BMP Plan shall become a part of this permit and all requirements of the BMP Plan shall become requirements of this permit.

3. Spill Prevention, Control, and Management

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

B. OTHER RESPONSIBILITIES

1. Duty to Mitigate Adverse Impacts

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

2. Right of Entry and Inspection

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

a. enter upon the permittee's premises where a regulated facility or activity or point source is located or conducted, or where records must be kept under the conditions of the permit;

b. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and

d. sample or monitor, for the purposes of assuring permit compliance or as otherwise authorized by the AWPCA, any substances or parameters at any location.

C. BYPASS AND UPSET

1. Bypass

a. Any bypass is prohibited except as provided in b. and c. below:

b. A bypass is not prohibited if:

(1) It does not cause any discharge limitation specified in Provision I. A. of this permit to be exceeded;

(2) It enters the same receiving stream as the permitted outfall; and

(3) It is necessary for essential maintenance of a treatment or control facility or system to assure efficient operation of such facility or system.

c. A bypass is not prohibited and need not meet the discharge limitations specified in Provision I. A. of this permit if:

(1) It is unavoidable to prevent loss of life, personal injury, or severe property damage;

(2) There are no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and

(3) The permittee submits a written request for authorization to bypass to the Director at least ten (10) days prior to the anticipated bypass (if possible), the permittee is granted such authorization, and the permittee complies with any conditions imposed by the Director to minimize any adverse impact on human health or the environment resulting from the bypass.

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

2. Upset

a. A discharge which results from an upset need not meet the discharge limitations specified in Provision I. A. of this permit if:

(1) No later than 24-hours after becoming aware of the occurrence of the upset, the permittee orally reports the occurrence and circumstances of the upset to the Director or his designee; and

(2) No later than five (5) days after becoming aware of the occurrence of the upset, the permittee furnishes the Director with evidence, including properly signed, contemporaneous operating logs, or other relevant evidence, demonstrating that (i) an upset occurred; (ii) the permittee can identify the specific cause(s) of the upset; (iii) the permittee's facility was being properly operated at the time of the upset; and (iv) the permittee promptly took all reasonable steps to minimize any adverse impact on human health or the environment resulting from the upset.

b. The permittee has the burden of establishing that each of the conditions of Provision II. C.2.a. of this permit have been met to qualify for an exemption from the discharge limitations specified in Provision I.A. of this permit.

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

1. Duty to Comply

a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the AWPCA and the FWPCA and is grounds for enforcement action, for permit termination, revocation and reissuance, suspension, modification; or denial of a permit renewal application.

b. The necessity to halt or reduce production or other activities in order to maintain compliance with the conditions of the permit shall not be a defense for a permittee in an enforcement action.

c. The discharge of a pollutant from a source not specifically identified in the permit application for this permit and not specifically included in the description of an outfall in this permit is not authorized and shall constitute noncompliance with this permit.

d. The permittee shall take all reasonable steps, including cessation of production or other activities, to minimize or prevent any violation of this permit or to minimize or prevent any adverse impact of any permit violation.

e. Nothing in this permit shall be construed to preclude and negate the permittee's responsibility or liability to apply for, obtain, or comply with other ADEM, Federal, State, or Local Government permits, certifications, licenses, or other approvals.

2. Removed Substances

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

3. Loss or Failure of Treatment Facilities

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

4. Compliance with Statutes and Rules

a. This permit has been issued under ADEM Administrative Code, Chapter 335-6-6. All provisions of this chapter, that are applicable to this permit, are hereby made a part of this permit. A copy of this chapter may be obtained for a small charge from the Office of General Counsel, Alabama Department of Environmental Management, 1400 Coliseum Blvd., Montgomery, AL 36130.

b. This permit does not authorize the noncompliance with or violation of any Laws of the State of Alabama or the United States of America or any regulations or rules implementing such laws. FWPCA, 33 U.S.C. Section 1319, and Code of Alabama 1975, Section 22-22-14.

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

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

a. If the permittee intends to continue to discharge beyond the expiration date of this permit, the permittee shall file a complete permit application for reissuance of this permit at least 180 days prior to its expiration. If the permittee does not intend to continue discharge beyond the expiration of this permit, the permittee shall submit written notification of this intent which shall be signed by an individual meeting the signatory requirements for a permit application as set forth in ADEM Administrative Code Rule 335-6-6-.09.

b. Failure of the permittee to apply for reissuance at least 180 days prior to permit expiration will void the automatic continuation of the expiring permit provided by ADEM Administrative Code Rule 335-6-6-.06 and should the permit not be reissued for any reason any discharge after expiration of this permit will be an unpermitted discharge.

2. Change in Discharge

a. The permittee shall apply for a permit modification at least 180 days in advance of any facility expansion, production increase, process change, or other action that could result in the discharge of additional pollutants or increase the quantity of a discharged pollutant such that existing permit limitations would be exceeded or that could result in an additional discharge point. This requirement applies to pollutants that are or that are not subject to discharge limitations in this permit. No new or increased discharge may begin until the Director has authorized it by issuance of a permit modification or a reissued permit.

b. The permittee shall notify the Director as soon as it is known or there is reason to believe:

(1) That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:

(i) one hundred micrograms per liter;

(ii) two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4,6-dini-trophenol; and one milligram per liter for antimony;

(iii) five times the maximum concentration value reported for that pollutant in the permit application; or

(2) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

(i) five hundred micrograms per liter;

(ii) one milligram per liter for antimony;

(iii) ten times the maximum concentration value reported for that pollutant in the permit application.

3. Transfer of Permit

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

4. Permit Modification and Revocation

a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:

(1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;

(2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or

(3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.

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

(1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;

(2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;

(3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;

(4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;

(5) Errors in calculation of discharge limitations or typographical or clerical errors were made;

(6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;

(7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;

(8) To agree with a granted variance under 30l(c), 30l(g), 30l(h), 30l(k), or 3l6(a) of the FWPCA or for fundamentally different factors;

(9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;

(10) When required by the reopener conditions in this permit;

(11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);

(12) Upon failure of the state to notify, as required by Section 402(b)(3) of the FWPCA, another state whose waters may be affected by a discharge permitted by this permit;

(13) When required to correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions; or

(14) When requested by the permittee and the Director determines that the modification has cause and will not result in a violation of federal or state law, regulations or rules.

5. Permit Termination

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

a. Violation of any term or condition of this permit;

b. The permittee's misrepresentation or failure to disclose fully all relevant facts in the permit application or during the permit issuance process or the permittee's misrepresentation of any relevant facts at any time;

c. Materially false or inaccurate statements or information in the permit application or the permit;

d. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge;

e. The permittee's discharge threatens human life or welfare or the maintenance of water quality standards;

f. Permanent closure of the facility generating the wastewater permitted to be discharged by this permit or permanent cessation of wastewater discharge;

g. New or revised requirements of any applicable standard or limitation that is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA that the Director determines cannot be complied with by the permittee; or

h. Any other cause allowed by the ADEM Administrative Code, Chapter 335-6-6.

6. Permit Suspension

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

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

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

F. Compliance with Toxic Pollutant Standard or Prohibition

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

G. Discharge of Wastewater Generated by Others

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

PART III: OTHER PERMIT CONDITIONS

A. CIVIL AND CRIMINAL LIABILITY

1. Tampering

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

2. False Statements

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

3. Permit Enforcement

a. Any NPDES permit issued or reissued by the Department is a permit for the purpose of the AWPCA and the FWPCA and as such any terms, conditions, or limitations of the permit are enforceable under state and federal law.

b. Any person required to have a NPDES permit pursuant to ADEM Administrative Code Chapter 335-6-6 and who discharges pollutants without said permit, who violates the conditions of said permit, who discharges pollutants in a manner not authorized by the permit, or who violates applicable orders of the Department or any applicable rule or standard of the Department, is subject to any one or combination of the following enforcement actions under applicable state statutes.

(1) An administrative order requiring abatement, compliance, mitigation, cessation, clean-up, and/or penalties;

(2) An action for damages;

(3) An action for injunctive relief; or

(4) An action for penalties.

c. If the permittee is not in compliance with the conditions of an expiring or expired permit the Director may choose to do any or all of the following provided the permittee has made a timely and complete application for reissuance of the permit:

(1) initiate enforcement action based upon the permit which has been continued;

(2) issue a notice of intent to deny the permit reissuance. If the permit is denied, the owner or operator would then be required to cease the activities authorized by the continued permit or be subject to enforcement action for operating without a permit;

(3) reissue the new permit with appropriate conditions; or

(4) take other actions authorized by these rules and AWPCA.

4. Relief from Liability

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

B. OIL AND HAZARDOUS SUBSTANCE LIABILITY

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

C. PROPERTY AND OTHER RIGHTS

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

D. AVAILABILITY OF REPORTS

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

E. EXPIRATION OF PERMITS FOR NEW OR INCREASED DISCHARGES

1. If this permit was issued for a new discharger or new source, this permit shall expire eighteen months after the issuance date if construction of the facility has not begun during the eighteen-month period.

2. If this permit was issued or modified to allow the discharge of increased quantities of pollutants to accommodate the modification of an existing facility and if construction of this modification has not begun during the eighteen month period after issuance of this permit or permit modification, this permit shall be modified to reduce the quantities of pollutants allowed to be discharged to those levels that would have been allowed if the modification of the facility had not been planned.

3. Construction has begun when the owner or operator has:

   a. begun, or caused to begin as part of a continuous on-site construction program:

      (1) any placement, assembly, or installation of facilities or equipment; or

      (2) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or

   b. entered into a binding contractual obligation for the purpose of placement, assembly, or installation of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under the paragraph. The entering into a lease with the State of Alabama for exploration and production of hydrocarbons shall also be considered beginning construction.

F. COMPLIANCE WITH WATER QUALITY STANDARDS

1. On the basis of the permittee's application, plans, or other available information, the Department has determined that compliance with the terms and conditions of this permit should assure compliance with the applicable water quality standards.

2. Compliance with permit terms and conditions notwithstanding, if the permittee's discharge(s) from point sources identified in Provision I. A. of this permit cause or contribute to a condition in contravention of state water quality standards, the Department may require abatement action to be taken by the permittee in emergency situations or modify the permit pursuant to the Department's Rules, or both.

3. If the Department determines, on the basis of a notice provided pursuant to this permit or any investigation, inspection or sampling, that a modification of this permit is necessary to assure maintenance of water quality standards or compliance with other provisions of the AWPCA or FWPCA, the Department may require such modification and, in cases of emergency, the Director may prohibit the discharge until the permit has been modified.

G. GROUNDWATER

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

H. DEFINITIONS

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

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

3. Arithmetic Mean – means the summation of the individual values of any set of values divided by the number of individual values.

4. AWPCA - means the Alabama Water Pollution Control Act.

5. BOD – means the five-day measure of the pollutant parameter biochemical oxygen demand.

6. Bypass - means the intentional diversion of waste streams from any portion of a treatment facility.

7. CBOD – means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.

8. Daily discharge - means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.

9. Daily maximum - means the highest value of any individual sample result obtained during a day.

10. Daily minimum - means the lowest value of any individual sample result obtained during a day.

11. Day - means any consecutive 24-hour period.

12. Department - means the Alabama Department of Environmental Management.

13. Director - means the Director of the Department.

14. Discharge - means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other wastes into waters of the state". Code of Alabama 1975, Section 22-22-1(b)(8).

15. Discharge Monitoring Report (DMR) - means the form approved by the Director to accomplish reporting requirements of an NPDES permit.

16. DO – means dissolved oxygen.

17. 8HC – means 8-hour composite sample, including any of the following:

    a. The mixing of at least 5 equal volume samples collected at constant time intervals of not more than 2 hours over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.

    b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.

18. EPA - means the United States Environmental Protection Agency.

19. FC – means the pollutant parameter fecal coliform.

20. Flow – means the total volume of discharge in a 24-hour period.

21. FWPCA - means the Federal Water Pollution Control Act.

22. Geometric Mean – means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).

23. Grab Sample – means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.

24. Indirect Discharger – means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.

25. Industrial User – means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category "Division D – Manufacturing" and such other classes of significant waste producers as, by regulation, the Director deems appropriate.

26. MGD – means million gallons per day.

27. Monthly Average – means, other than for fecal coliform bacteria, the arithmetic mean of the entire composite or grab samples taken for the daily discharges collected in one month period. The monthly average for fecal coliform bacteria is the geometric mean of daily discharge samples collected in a one month period. The monthly average for flow is the arithmetic mean of all flow measurements taken in a one month period.

28. New Discharger – means a person, owning or operating any building, structure, facility or installation:

    a. from which there is or may be a discharge of pollutants;

    b. that did not commence the discharge of pollutants prior to August 13, 1979, and which is not a new source; and

    c. which has never received a final effective NPDES permit for dischargers at that site.

29. NH3-N – means the pollutant parameter ammonia, measured as nitrogen.

30. Permit application - means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.

31. Point source - means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, . . . from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. Section 1362(14).

32. Pollutant - includes for purposes of this permit, but is not limited to, those pollutants specified in Code of Alabama 1975, Section 22-22-1(b)(3) and those effluent characteristics specified in Provision I. A. of this permit.

33. Privately Owned Treatment Works – means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a "POTW".

34. Publicly Owned Treatment Works – means a wastewater collection and treatment facility owned by the State, municipality, regional entity composed of two or more municipalities, or another entity created by the State or local authority for the purpose of collecting and treating municipal wastewater.

35. Receiving Stream – means the "waters" receiving a "discharge" from a "point source".

36. Severe property damage - means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

37. Significant Source – means a source which discharges 0.025 MGD or more to a POTW or greater than five percent of the treatment work's capacity, or a source which is a primary industry as defined by the U.S. EPA or which discharges a priority or toxic pollutant.

38. Solvent – means any virgin, used or spent organic solvent(s) identified in the F-Listed wastes (F001 through F005) specified in 40 CFR 261.31 that is used for the purpose of solubilizing other materials.

39. TKN – means the pollutant parameter Total Kjeldahl Nitrogen.

40. TON – means the pollutant parameter Total Organic Nitrogen.

41. TRC – means Total Residual Chlorine.

42. TSS – means the pollutant parameter Total Suspended Solids.

43. 24HC – means 24-hour composite sample, including any of the following:

    a. the mixing of at least 12 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;

    b. a sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected; or

    c. a sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.

44. Upset - means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

45. Waters - means "[a]ll waters of any river, stream, watercourse, pond, lake, coastal, ground or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely upon the property of a single individual, partnership or corporation unless such waters are used in interstate commerce." Code of Alabama 1975, Section 22-22-1(b)(2). Waters "include all navigable waters" as defined in Section 502(7) of the FWPCA, 22 U.S.C. Section 1362(7), which are within the State of Alabama.

46. Week - means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.

47. Weekly (7-day and calendar week) Average – is the arithmetic mean of all samples collected during a consecutive 7-day period or calendar week, whichever is applicable. The calendar week is defined as beginning on Sunday and ending on Saturday. Weekly averages shall be calculated for all calendar weeks with Saturdays in the month. If a calendar week overlaps two months (i.e., the Sunday is in one month and the Saturday in the following month), the weekly average calculated for the calendar week shall be included in the data for the month that contains the Saturday.

I. SEVERABILITY

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

PART IV: ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS

A. BEST MANAGEMENT PRACTICES (BMP) PLAN REQUIREMENTS

1. BMP Plan

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

2. Plan Content

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

a. Establish specific objectives for the control of pollutants:

(1) Each facility component or system shall be examined for its potential for causing a release of significant amounts of pollutants to waters of the State due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.

(2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g. precipitation), or circumstances to result in significant amounts of pollutants reaching surface waters, the plan should include a prediction of the direction, rate of flow, and total quantity of pollutants which could be discharged from the facility as a result of each condition or circumstance.

b. Establish specific best management practices to meet the objectives identified under paragraph a. of this section, addressing each component or system capable of causing a release of significant amounts of pollutants to the waters of the State, and identifying specific preventative or remedial measures to be implemented;

c. Establish a program to identify and repair leaking equipment items and damaged containment structures, which may contribute to contaminated stormwater runoff. This program must include regular visual inspections of equipment, containment structures and of the facility in general to ensure that the BMP is continually implemented and effective;

d. Prevent the spillage or loss of fluids, oil, grease, gasoline, etc. from vehicle and equipment maintenance activities and thereby prevent the contamination of stormwater from these substances;

e. Prevent or minimize stormwater contact with material stored on site;

f. Designate by position or name the person or persons responsible for the day to day implementation of the BMP;

g. Provide for routine inspections, on days during which the facility is manned, of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general. Routine inspections should be done at a frequency to ensure that the BMP is continually implemented and effective and in no case less frequent than once per year;

h. Provide for the use and disposal of any material used to absorb spilled fluids that could contaminate stormwater;

i. Develop a solvent management plan, if solvents are used on site. The solvent management plan shall include as a minimum lists of the solvents on site; the disposal method of solvents used instead of dumping, such as reclamation, contract hauling; and the procedures for assuring that solvents do not routinely spill or leak into the stormwater;

j. Provide for the disposal of all used oils, hydraulic fluids, firefighting foams, solvent degreasing material, etc. in accordance with good management practices and any applicable state or federal regulations;

k. Include a diagram of the facility showing the locations where stormwater exits the facility, the locations of any structure or other mechanisms intended to prevent pollution of stormwater or to remove pollutants from stormwater, the locations of any collection and handling systems;

l. Provide control sufficient to prevent or control pollution of stormwater by soil particles to the degree required to maintain compliance with the water quality standard for turbidity applicable to the waterbody(s) receiving discharge(s) under this permit;

m. Provide spill prevention, control, and/or management sufficient to prevent or minimize contaminated stormwater runoff. Any containment system used to implement this requirement shall be constructed of materials compatible with the

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

n. Provide and maintain curbing, diking or other means of isolating process areas to the extent necessary to allow segregation and collection for treatment of contaminated stormwater from process areas;

o. Be reviewed by plant engineering staff and the plant manager; and

p. Bear the signature of the plant manager.

3. Compliance Schedule

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

4. Department Review

a. When requested by the Director or his designee, the permittee shall make the BMP available for Department review.

b. The Director or his designee may notify the permittee at any time that the BMP is deficient and require correction of the deficiency.

c. The permittee shall correct any BMP deficiency identified by the Director or his designee within 30 days of receipt of notification and shall certify to the Department that the correction has been made and implemented.

5. Administrative Procedures

a. A copy of the BMP shall be maintained at the facility and shall be available for inspection by representatives of the Department.

b. A log of the routine inspection required above shall be maintained at the facility and shall be available for inspection by representatives of the Department. The log shall contain records of all inspections performed for the last three years and each entry shall be signed by the person performing the inspection.

c. The permittee shall provide training for any personnel required to implement the BMP and shall retain documentation of such training at the facility. This documentation shall be available for inspection by representatives of the Department. Training shall be performed prior to the date that implementation of the BMP is required.

d. BMP Plan Modification. The permittee shall amend the BMP plan whenever there is a change in the facility or change in operation of the facility which materially increases the potential for the ancillary activities to result in a discharge of significant amounts of pollutants.

e. BMP Plan Review. The permittee shall complete a review and evaluation of the BMP plan at least once every three years from the date of preparation of the BMP plan. Documentation of the BMP Plan review and evaluation shall be signed and dated by the Plant Manager.

B. STORMWATER FLOW MEASUREMENT AND SAMPLING REQUIREMENTS

1. Stormwater Flow Measurement

a. All stormwater samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches.

b. The total volume of stormwater discharged for the event must be monitored, including the date and duration (in hours) and rainfall (in inches) for storm event(s) sampled. The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event must be a minimum of 72 hours. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

c. The volume may be measured using flow measuring devices, or estimated based on a modification of the Rational Method using total depth of rainfall, the size of the drainage area serving a stormwater outfall, and an estimate of the runoff coefficient of the drainage area. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

2. Stormwater Sampling

a. A grab sample, if required by this permit, shall be taken during the first thirty minutes of the discharge (or as soon thereafter as practicable); and a flow-weighted composite sample, if required by this permit, shall be taken for the entire event or for the first three hours of the event.

b. All test procedures will be in accordance with part I.B. of this permit.

ADEM PERMIT RATIONALE

PREPARED DATE: June 6, 2025
REVISED DATE: September 12, 2025
PREPARED BY: Victoria Kim

Permittee Name: West Fraser US EWP LLC

Facility Name: West Fraser Huguley

Permit Number: AL0084491

PERMIT IS INITIAL ISSUANCE

DISCHARGE SERIAL NUMBERS (DSN) & DESCRIPTIONS:

DSN	Description
001	Process wastewater, boiler blowdown, and stormwater associated with Oriented Strand Board (OSB) manufacturing operations.

INDUSTRIAL CATEGORY: NON-CATEGORICAL

MAJOR: N

STREAM INFORMATION:

Receiving Stream:	Unnamed Tributary to Little Osanippa Creek
Classification:	Fish & Wildlife
River Basin:	Chattahoochee
7Q10:	0.0 cfs
7Q2:	0.0 cfs
1Q10:	0.0 cfs
Annual Average Flow:	0.83 cfs
303(d) List:	NO
Impairment:	N/A
TMDL:	NO

DISCUSSION:

West Fraser US EWP, LLC operates an Oriented Strand Board (OSB) manufacturing facility in Huguley, Alabama. Facility operations include green wood handling and processing, green wood drying, dry strand blending, mat forming and pressing, and board finishing. Significant materials associated with Outfall 001 include those commonly present in OSB production. Wood ash is generated during boiler and kiln operations where wood material is used as fuel; the ash is cooled with water prior to disposal. Under this permit, the facility is authorized to discharge boiler blowdown, small amounts of ash cooling water, and pad washdown water, all of which are commingled with industrial-impacted stormwater.

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

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

DSN0011: Process wastewater, boiler blowdown, and stormwater associated with Oriented Strand Board (OSB) manufacturing operations.

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type	Seasonal	Basis
Oxygen, Dissolved (DO) (00300) Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	*****	mg/l	2X Monthly	Grab	All Months	WQBEL
BOD, 5-Day (20 Deg. C) (00310) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months	BPJ
pH (00400) Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	8.5 Maximum Daily	S.U.	2X Monthly	Grab	All Months	WQBEL
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months	BPJ
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	15 Maximum Daily	mg/l	2X Monthly	Grab	All Months	BPJ
Nitrogen, Ammonia Total (As N) (00610) Effluent Gross Value	*****	*****	*****	*****	2 Monthly Average	3 Maximum Daily	mg/l	2X Monthly	Grab	All Months	WQBEL
Nitrogen, Kjeldahl Total (As N) (00625) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	Apr, May, Jun, Jul, Aug, Sep, Oct	BPJ
Nitrite Plus Nitrate Total 1 Det. (As N) (00630) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	Apr, May, Jun, Jul, Aug, Sep, Oct	BPJ
Phosphorus, Total (As P) (00665) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	Apr, May, Jun, Jul, Aug, Sep, Oct	BPJ
Carbon, Tot Organic (TOC) (00680) Effluent Gross Value	*****	*****	*****	*****	(Report) Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months	BPJ
Copper, Total (As Cu) (01042) Effluent Gross Value	*****	*****	*****	*****	0.0127 Monthly Average	0.0180 Maximum Daily	mg/l	2X Monthly	Grab	All Months	WQBEL
Lead, Total Recoverable (01114) Effluent Gross Value	*****	*****	*****	*****	0.0057 Monthly Average	(Report) Maximum Daily	mg/l	2X Monthly	Grab	All Months	WQBEL
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	*****	*****	*****	*****	2X Monthly	Measured	All Months	BPJ
BOD, Carbonaceous 05 Day, 20C (80082) Effluent Gross Value	*****	*****	*****	*****	4 Monthly Average	6 Maximum Daily	mg/l	2X Monthly	Grab	All Months	WQBEL

*Basis for Permit Limitation

- BPJ – Best Professional Judgment
- WQBEL – Water Quality Based Effluent Limits

Discussion

Best Professional Judgment (BPJ)

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

Oil & Grease

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

Water Quality Based Effluent Limits (WQBEL)

pH

ADEM Administrative Code, Division 6 Regulations, specifically 335-6-10-.09(5)(e)2 – Specific Water Quality for Fish and Wildlife classified streams states: "Sewage, industrial waste or other wastes shall not cause the pH to deviate more than one unit from then normal or natural pH, nor be less than 6.0, nor greater than 8.5 standard units." The discharge is not expected to have a significant effect on the receiving stream due to the low effluent/stream flow ratio.

Numeric Reasonable Potential Analysis (RPA)

The Department completed a numeric reasonable potential analysis (RPA) of the discharge based on laboratory data provided in the Permittee's application. The RPA indicates whether pollutants in treated effluent have the potential to contribute to excursions of Alabama's in-stream water quality standards. Based on the RPA, Copper and Lead demonstrate reasonable potential to exceed applicable water quality criteria. For Copper, the freshwater acute and chronic water quality criteria are 0.0180 mg/L and 0.0127 mg/L, respectively. For Lead, the freshwater chronic criteria is 0.0057 mg/L, respectively. The acute criteria is applied as maximum daily limits, and the chronic criteria are applied as monthly average limits in the permit.

Carbonaceous Biochemical Oxygen Demand ($CBOD_5$), Ammonia as Nitrogen (NH_3-N), and Dissolved Oxygen (DO)

The following is the recommended effluent limitations from the May 2025 waste load allocation (WLA) (see attached) from a water quality model performed by the ADEM Water Quality Section. Based on the results of this analysis, the Department established annual average limits of 4 mg/L for $CBOD_5$, 2 mg/L for NH_3-N, and a minimum concentration of 6 mg/L for DO. The daily maximum limits for $CBOD_5$ and NH_3-N are 1.5 times the monthly average limit based on BPJ.

Nitrogen, Kjeldahl Total (TKN), Total Phosphorus, and Nitrite+Nitrate

TKN, Phosphorus, and Nitrite+Nitrate are proposed to be monitored without limitations based on the WLA. These parameters are proposed to be monitored monthly during the growing season of April – October.

Best Management Practices (BMP) Plan

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

September 12, 2025 Revision

The facility submitted comments on the draft permit on August 7, 2025 (see attached). The response and/or revision to each request is addressed below.

Carbonaceous Biochemical Oxygen Demand ($CBOD_5$)

The Department's Spreadsheet Water Quality Model (SWQM), which was utilized for modeling the discharge from West Fraser Huguley, is a Streeter-Phelps-based model that simulates the effects of ultimate carbonaceous biochemical oxygen demand (CBODu), ammonia (NH3-N) and total organic nitrogen (TON) on the instream dissolved oxygen. CBODu, NH3-N, and TON make up the total ultimate biochemical oxygen demand (BODu). Since the model simulates CBODu and NH3-N separately, effluent limits for each of these parameters were recommended for the permit. (A CBOD5 limit was input into the model and converted to CBODu; the CBOD5 limit is utilized in the permit.) There is currently no direct factor for converting CBODu to BODu. The use of the SWQM and implementation of CBOD5 permit limits is consistent with the Department's current modeling/permitting protocols for this type of discharge scenario.

Composite Sampling Requirements

The facility requested removal of composite sampling requirements, citing the intermittent, rainfall-driven nature of the discharge and the difficulty of staging a composite sampler at the remote outfall. The permit has been revised to allow grab sampling for all parameters.

Monitoring Frequency

The monitoring frequency for all parameters has been increased from monthly to twice per month. This revision is intended to provide additional data to better characterize the discharge, given the intermittent and rainfall-driven nature of the outfall.

Best Management Practices (BMP) Plan

The Department has updated the BMP language located in Part IV.A.2.g of the Permit. The Permit Condition now states "Provide for routine inspections, or days during which the facility is manned, of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general. Routine inspections should be done at a frequency to ensure that the BMP is continually implemented and effective and in no case less frequent than once per year." This clarification was added to be consistent with 40 CFR Part 122.43(c).

Facility Name: **West Fraser Huguley**

NPDES No.: **AL0084491**

8/13/2017

$Q_d * C_d + Q_{d2} * C_{d2} + Q_s * C_s = Q_r * C_r$

ID	Pollutant	Carcinogen "yes"	Type	Background from upstream source (C_{d2}) Daily Max µg/l	Background from upstream source (C_{d2}) Monthly Ave µg/l	Background Instream (C_s) Daily Max µg/l	Background Instream (C_s) Monthly Ave µg/l	Enter Max Daily Discharge as reported by Applicant (C_d) Max µg/l	Enter Avg Daily Discharge as reported by Applicant (C_d) Ave µg/l	Partition Coefficient (Stream / Lake)
1	Antimony		Metals	0	0	0	0	0	0	-
2	**Arsenic*, ****	YES	Metals	0	0	0	0	0	0	0.574
3	Beryllium		Metals	0	0	0	0	0	0	-
4	Cadmium**		Metals	0	0	0	0	0	0	0.236
5	Chromium / Chromium III**		Metals	0	0	0	0	1.8	1.8	0.210
6	Chromium / Chromium VI**		Metals	0	0	0	0	0	0	
7	Copper**		Metals	0	0	0	0	4.4	4.4	0.388
8	Lead**		Metals	0	0	0	0	1.8	1.8	0.206
9	Mercury**		Metals	0	0	0	0	0	0	0.302
10	Nickel**		Metals	0	0	0	0	1.6	1.6	0.505
11	Selenium		Metals	0	0	0	0	0	0	-
12	Silver		Metals	0	0	0	0	0	0	-
13	Thallium		Metals	0	0	0	0	0	0	-
14	Zinc**		Metals	0	0	0	0	27.2	27.2	0.330
15	Cyanide		Metals	0	0	0	0	0	0	-
16	Total Phenolic Compounds		Metals	0	0	0	0	0	0	-
17	Hardness (As CaCO3)		Metals	0	0	0	0	0	0	-
18	Acrolein		VOC	0	0	0	0	0	0	-
19	**Acrylonitrile***	YES	VOC	0	0	0	0	0	0	-
20	**Aldrin**	YES	VOC	0	0	0	0	0	0	-
21	**Benzene***	YES	VOC	0	0	0	0	0	0	-
22	**Bromoform***	YES	VOC	0	0	0	0	0	0	-
23	**Carbon Tetrachloride***	YES	VOC	0	0	0	0	0	0	-
24	**Chlordane**	YES	VOC	0	0	0	0	0	0	-
25	Clorobenzene		VOC	0	0	0	0	0	0	-
26	**Chlorodibromo-Methane***	YES	VOC	0	0	0	0	0	0	-
27	Chloroethane		VOC	0	0	0	0	0	0	-
28	2-Chloro-Ethylvinyl Ether		VOC	0	0	0	0	0	0	-
29	**ChloroForm***	YES	VOC	0	0	0	0	0	0	-
30	**4,4'-DDD**	YES	VOC	0	0	0	0	0	0	-
31	**4,4'-DDE**	YES	VOC	0	0	0	0	0	0	-
32	**4,4'-DDT**	YES	VOC	0	0	0	0	0	0	-
33	**Dichlorobromo-Methane***	YES	VOC	0	0	0	0	0	0	-
34	1, 1-Dichloroethane		VOC	0	0	0	0	0	0	-
35	**1, 2-Dichloroethane***	YES	VOC	0	0	0	0	0	0	-
36	Trans-1, 2-Dichloro-Ethylene		VOC	0	0	0	0	0	0	-
37	**1, 1-Dichloroethylene***	YES	VOC	0	0	0	0	0	0	-
38	1, 2-Dichloropropane		VOC	0	0	0	0	0	0	-
39	1, 3-Dichloro-Propylene		VOC	0	0	0	0	0	0	-
40	**Dieldrin**	YES	VOC	0	0	0	0	0	0	-
41	Ethylbenzene		VOC	0	0	0	0	0	0	-
42	Methyl Bromide		VOC	0	0	0	0	0	0	-
43	Methyl Chloride		VOC	0	0	0	0	0	0	-
44	**Methylene Chloride***	YES	VOC	0	0	0	0	0	0	-
45	**1, 1, 2, 2-Tetrachloro-Ethane***	YES	VOC	0	0	0	0	0	0	-
46	**Tetrachloro-Ethylene***	YES	VOC	0	0	0	0	0	0	-
47	Toluene		VOC	0	0	0	0	0	0	-
48	**Toxaphene**	YES	VOC	0	0	0	0	0	0	-
49	**Tributyltine (TBT)**	YES	VOC	0	0	0	0	0	0	-
50	1, 1, 1-Trichloroethane		VOC	0	0	0	0	0	0	-
51	**1, 1, 2-Trichloroethane***	YES	VOC	0	0	0	0	0	0	-
52	**Trichloroethylene***	YES	VOC	0	0	0	0	0	0	-
53	**Vinyl Chloride***	YES	VOC	0	0	0	0	0	0	-
54	P-Chloro-M-Cresol		Acids	0	0	0	0	0	0	-
55	2-Chlorophenol		Acids	0	0	0	0	0	0	-
56	2, 4-Dichlorophenol		Acids	0	0	0	0	0	0	-
57	2, 4-Dimethylphenol		Acids	0	0	0	0	0	0	-
58	4, 6-Dinitro-O-Cresol		Acids	0	0	0	0	0	0	-
59	2, 4-Dinitrophenol		Acids	0	0	0	0	0	0	-
60	**4,6-Dintro-2-methylophenol**	YES	Acids	0	0	0	0	0	0	-
61	**Dioxin (2,3,7,8-TCDD)**	YES	Acids	0	0	0	0	0	0	-
62	2-Nitrophenol		Acids	0	0	0	0	0	0	-
63	4-Nitrophenol		Acids	0	0	0	0	0	0	-
64	**Pentachlorophenol***	YES	Acids	0	0	0	0	0	0	-
65	Phenol		Acids	0	0	0	0	0	0	-
66	**2, 4, 6-Trichlorophenol***	YES	Acids	0	0	0	0	0	0	-
67	Acenaphthene		Bases	0	0	0	0	0	0	-
68	Acenaphthylene		Bases	0	0	0	0	0	0	-
69	Anthracene		Bases	0	0	0	0	0	0	-
70	Benzidine		Bases	0	0	0	0	0	0	-
71	**Benzo(A)Anthracene***	YES	Bases	0	0	0	0	0	0	-
72	**Benzo(A)Pyrene***	YES	Bases	0	0	0	0	0	0	-
73	3, 4 Benzo-Fluoranthene		Bases	0	0	0	0	0	0	-
74	Benzo(GHI)Perylene		Bases	0	0	0	0	0	0	-
75	Benzo(K)Fluoranthene		Bases	0	0	0	0	0	0	-
76	Bis (2-Chloroethoxy) Methane		Bases	0	0	0	0	0	0	-
77	**Bis (2-Chloroethyl)-Ether***	YES	Bases	0	0	0	0	0	0	-
78	Bis (2-Chloroiso-Propyl) Ether		Bases	0	0	0	0	0	0	-
79	**Bis (2-Ethylhexyl) Phthalate***	YES	Bases	0	0	0	0	0	0	-
80	4-Bromophenyl Phenyl Ether		Bases	0	0	0	0	0	0	-
81	Butyl Benzyl Phthalate		Bases	0	0	0	0	0	0	-
82	2-Chloronaphthalene		Bases	0	0	0	0	0	0	-
83	4-Chlorophenyl Phenyl Ether		Bases	0	0	0	0	0	0	-
84	**Chrysene***	YES	Bases	0	0	0	0	0	0	-
85	Di-N-Butyl Phthalate		Bases	0	0	0	0	0	0	-
86	Di-N-Octyl Phthalate		Bases	0	0	0	0	0	0	-
87	**Dibenzo(A,H)Anthracene***	YES	Bases	0	0	0	0	0	0	-
88	1, 2-Dichlorobenzene		Bases	0	0	0	0	0	0	-
89	1, 3-Dichlorobenzene		Bases	0	0	0	0	0	0	-
90	1, 4-Dichlorobenzene		Bases	0	0	0	0	0	0	-
91	**3, 3-Dichlorobenzidine***	YES	Bases	0	0	0	0	0	0	-
92	Diethyl Phthalate		Bases	0	0	0	0	0	0	-
93	Dimethyl Phthalate		Bases	0	0	0	0	0	0	-
94	**2, 4-Dinitrotoluene***	YES	Bases	0	0	0	0	0	0	-
95	2, 6-Dinitrotoluene		Bases	0	0	0	0	0	0	-
96	1,2-Diphenylhydrazine		Bases	0	0	0	0	0	0	-
97	**Endosulfan (alpha)**	YES	Bases	0	0	0	0	0	0	-
98	**Endosulfan (beta)**	YES	Bases	0	0	0	0	0	0	-
99	**Endosulfan sulfate**	YES	Bases	0	0	0	0	0	0	-
100	**Endrin**	YES	Bases	0	0	0	0	0	0	-
101	**Endrin Aldeyhide**	YES	Bases	0	0	0	0	0	0	-
102	Fluoranthene		Bases	0	0	0	0	0	0	-
103	Fluorene		Bases	0	0	0	0	0	0	-
104	Heptochlor	YES	Bases	0	0	0	0	0	0	-
105	Heptachlor Epoxide	YES	Bases	0	0	0	0	0	0	-
106	**Hexachlorobenzene***	YES	Bases	0	0	0	0	0	0	-
107	**Hexachlorobutadiene***	YES	Bases	0	0	0	0	0	0	-
108	**Hexachlorocyclohexan (alpa)**	YES	Bases	0	0	0	0	0	0	-
109	**Hexachlorocyclohexan (beta)**	YES	Bases	0	0	0	0	0	0	-
110	**Hexachlorocyclohexan (gamma)**	YES	Bases	0	0	0	0	0	0	-
111	HexachlorocycloPentadiene		Bases	0	0	0	0	0	0	-
112	Hexachloroethane		Bases	0	0	0	0	0	0	-
113	**Indeno(1, 2, 3-CK)Pyrene***	YES	Bases	0	0	0	0	0	0	-
114	Isophorone		Bases	0	0	0	0	0	0	-
115	Naphthalene		Bases	0	0	0	0	0	0	-
116	Nitrobenzene		Bases	0	0	0	0	0	0	-
117	**N-Nitrosodi-N-Propylamine***	YES	Bases	0	0	0	0	0	0	-
118	**N-Nitrosodi-N-Methylamine***	YES	Bases	0	0	0	0	0	0	-
119	**N-Nitrosodi-N-Phenylamine***	YES	Bases	0	0	0	0	0	0	-
120	**PCB-1016**	YES	Bases	0	0	0	0	0	0	-
121	**PCB-1221**	YES	Bases	0	0	0	0	0	0	-
122	**PCB-1232**	YES	Bases	0	0	0	0	0	0	-
123	**PCB-1242**	YES	Bases	0	0	0	0	0	0	-
124	**PCB-1248**	YES	Bases	0	0	0	0	0	0	-
125	**PCB-1254**	YES	Bases	0	0	0	0	0	0	-
126	**PCB-1260**	YES	Bases	0	0	0	0	0	0	-
127	Phenanthrene		Bases	0	0	0	0	0	0	-
128	Pyrene		Bases	0	0	0	0	0	0	-
129	1, 2, 4-Trichlorobenzene		Bases	0	0	0	0	0	0	-

0.2095	Enter Q_d = wastewater discharge flow from facility (MGD)
0.32414448	Q_d = wastewater discharge flow (cfs) (this value is calucated from the MGD)
0	Enter flow from upstream discharge Qd2 = background stream flow in MGD above point of discharge
0	Qd2 = background stream flow from upstream source (cfs)
0	Enter 7Q10, Q_s = background stream flow in cfs above point of discharge
0	Enter or estimated, 1Q10, Q_s = background stream flow in cfs above point of discharge (1Q10 estimated at 75% of 7Q10)
0.83	Enter Mean Annual Flow, Q_s = background stream flow in cfs above point of discharge
0	Enter 7Q2, Q_s = background stream flow in cfs above point of discharge (For LWF class streams)
Enter to Left	Enter C_s = background in-stream pollutant concentration in µg/l (assuming this is zero "0" unless there is data)
$Q_d + Qd2 + Q_s$	Q_r = resultant in-stream flow, after discharge
Calculated on other	C_r = resultant in-stream pollutant concentration in µg/l in the stream (after complete mixing occurs)
50	Enter, Background Hardness above point of discharge (assumed 50 South of Birmingham and 100 North of Birmingham)
7.00 s.u.	Enter, Background pH above point of discharge
YES	Enter, Is discharge to a stream? "YES" Other option would be to a Lake. (This changes the partition coefficients for the metals)

** Using Partition Coefficients

September 17, 2025

Facility Name: West Fraser Huguley

NPDES No.: AL0084491

						Freshwater F&W classification.						Freshwater Acute (µg/l) Q_s =1Q10					Freshwater Chronic (µg/l) Q_s = 7Q10					Human Health Consumption Fish only (µg/l) Carcinogen Q_s = Annual Average Non-Carcinogen Q_s = 7Q10			
ID	Pollutant	RP?	Carcinogen yes	Background from upstream source (Cd2) Daily Max	Max Daily Discharge as reported by Applicant (C_{dmax})	Water Quality Criteria (C_c)	Draft Permit Limit (C_{dmax})	20% of Draft Permit Limit	RP?	Background from upstream source (Cd2) Monthly Ave	Avg Daily Discharge as reported by Applicant (C_{davg})	Water Quality Criteria (C_c)	Draft Permit Limit (C_{davg})	20% of Draft Permit Limit	RP?	Water Quality Criteria (C_c)	Draft Permit Limit (C_{davg})	20% of Draft Permit Limit	RP?
1	Antimony			0	0	-	-	-	-	0	0	-	-	-	-	3.73E+02	3.73E+02	7.47E+01	No
2	Arsenic		YES	0	0	592.334	592.334	118.467	No	0	0	281.324	281.324	52.265	No	3.03E-01	1.08E+00	2.16E-01	No
3	Berylium			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
4	Cadmium			0	0	4.347	4.347	0.869	No	0	0	0.644	0.644	0.129	No	-	-	-	-
5	Chromium/ Chromium III			0	1.8	1537.913	1537.913	307.583	No	0	1.8	200.051	200.051	40.010	No	-	-	-	-
6	Chromium/ Chromium VI			0	0	16.000	16.000	3.200	No	0	0	11.000	11.000	2.200	No	-	-	-	-
7	Copper	YES		0	4.4	18.026	18.026	3.605	Yes	0	4.4	12.766	12.766	2.553	Yes	-	-	-	-
8	Lead	YES		0	1.8	146.291	146.291	29.258	No	0	1.8	5.701	5.701	1.140	Yes	-	-	-	-
9	Mercury			0	0	2.400	2.400	0.480	No	0	0	0.012	0.012	0.002	No	4.24E-02	4.24E-02	8.48E-03	No
10	Nickel			0	1.6	515.824	515.824	103.165	No	0	1.6	57.292	57.292	11.458	No	9.93E+02	9.93E+02	1.99E+02	No
11	Selenium			0	0	20.000	20.000	4.000	No	0	0	5.000	5.000	1.000	No	2.43E+03	2.43E+03	4.86E+02	No
12	Silver			0	0	0.975	0.976	0.195	No	0	0	-	-	-	-	-	-	-	-
13	Thallium			0	0	-	-	-	-	0	0	-	-	-	-	2.74E-01	2.74E-01	5.47E-02	No
14	Zinc			0	27.2	197.369	197.369	39.474	No	0	27.2	198.983	198.983	39.797	No	1.49E+04	1.49E+04	2.98E+03	No
15	Cyanide			0	0	22.000	22.000	4.400	No	0	0	5.200	5.200	1.040	No	9.33E+03	9.33E+03	1.87E+03	No
16	Total Phenolic Compounds			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
17	Hardness (As CaCO3)			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
18	Acrolein			0	0	-	-	-	-	0	0	-	-	-	-	5.43E+00	5.43E+00	1.09E+00	No
19	Acrylonitrile		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.44E-01	5.13E-01	1.03E-01	No
20	Aldrin		YES	0	0	3.000	3.000	0.600	No	0	0	-	-	-	-	2.94E-05	1.05E-04	2.09E-05	No
21	Benzene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.55E+01	5.51E+01	1.10E+01	No
22	Bromoform		YES	0	0	-	-	-	-	0	0	-	-	-	-	7.88E+01	2.80E+02	5.61E+01	No
23	Carbon Tetrachloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.57E-01	3.41E+00	6.82E-01	No
24	Chlordane		YES	0	0	2.400	2.400	0.480	No	0	0	0.0043	0.004	0.001	No	4.73E-04	1.68E-03	3.37E-04	No
25	Clorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	9.06E+02	9.06E+02	1.81E+02	No
26	Chlorodibromo-Methane		YES	0	0	-	-	-	-	0	0	-	-	-	-	7.41E+00	2.64E+01	5.27E+00	No
27	Chloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
28	2-Chloro-Ethylvinyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
29	ChloroForm		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.02E+02	3.63E+02	7.26E+01	No
30	4,4' - DDD		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.81E-04	6.46E-04	1.29E-04	No
31	4,4' - DDE		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.28E-04	4.56E-04	9.12E-05	No
32	4,4' - DDT		YES	0	0	1.100	1.100	0.220	No	0	0	0.001	0.001	0.000	No	1.28E-04	4.56E-04	9.12E-05	No
33	Dichlorobromo-Methane		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.00E+01	3.57E+01	7.15E+00	No
34	1, 1-Dichloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
35	1, 2-Dichloroethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.14E+01	7.61E+01	1.52E+01	No
36	Trans-1, 2-Dichloro-Ethylene			0	0	-	-	-	-	0	0	-	-	-	-	5.91E+03	5.91E+03	1.18E+03	No
37	1, 1-Dichloroethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	4.17E+03	1.48E+04	2.97E+03	No
38	1, 2-Dichloropropane			0	0	-	-	-	-	0	0	-	-	-	-	8.49E+00	8.49E+00	1.70E+00	No
39	1, 3-Dichloro-Propylene			0	0	-	-	-	-	0	0	-	-	-	-	1.23E+01	1.23E+01	2.46E+00	No
40	Dieldrin		YES	0	0	0.240	0.240	0.048	No	0	0	0.056	0.056	0.011	No	3.12E-05	1.11E-04	2.22E-05	No
41	Ethylbenzene			0	0	-	-	-	-	0	0	-	-	-	-	1.24E+03	1.24E+03	2.49E+02	No
42	Methyl Bromide			0	0	-	-	-	-	0	0	-	-	-	-	8.71E+02	8.71E+02	1.74E+02	No
43	Methyl Chloride			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
44	Methylene Chloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.46E+02	1.23E+03	2.48E+02	No
45	1, 1, 2, 2-Tetrachloro-Ethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.33E+00	8.31E+00	1.66E+00	No
46	Tetrachloro-Ethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.92E+00	6.83E+00	1.37E+00	No
47	Toluene			0	0	-	-	-	-	0	0	-	-	-	-	8.72E+03	8.72E+03	1.74E+03	No
48	Toxaphene		YES	0	0	0.730	0.730	0.146	No	0	0	0.0002	0.000	0.000	No	1.62E-04	5.77E-04	1.15E-04	No
49	Tributyltin (TBT)		YES	0	0	0.460	0.460	0.092	No	0	0	0.072	0.072	0.014	No	-	-	-	-
50	1, 1, 1-Trichloroethane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
51	1, 1, 2-Trichloroethane		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.12E+00	3.24E+01	6.48E+00	No
52	Trichlorethylene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.75E+01	6.22E+01	1.24E+01	No
53	Vinyl Chloride		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.42E+00	5.07E+00	1.01E+00	No
54	P-Chloro-M-Cresol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
55	2-Chlorophenol			0	0	-	-	-	-	0	0	-	-	-	-	8.71E+01	8.71E+01	1.74E+01	No
56	2, 4-Dichlorophenol			0	0	-	-	-	-	0	0	-	-	-	-	1.72E+03	1.72E+02	3.44E+01	No
57	2, 4-Dimethylphenol			0	0	-	-	-	-	0	0	-	-	-	-	4.98E+02	4.98E+02	9.95E+01	No
58	4, 6-Dinitro-O-Cresol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
59	2, 4-Dinitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	3.11E+03	3.11E+03	6.22E+02	No
60	4,6-Dinitro-2-methylphenol		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.82E+03	5.89E+02	1.18E+02	No
61	Dioxin (2,3,7,8-TCDD)		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.47E-08	9.49E-08	1.90E-08	No
62	2-Nitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
63	4-Nitrophenol			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
64	Pentachlorophenol		YES	0	0	8.723	8.723	1.745	No	0	0	6.693	6.693	1.339	No	1.77E+01	6.29E+00	1.26E+00	No
65	Phenol			0	0	-	-	-	-	0	0	-	-	-	-	5.00E+05	5.00E+05	1.00E+05	No
66	2, 4, 6-Trichlorophenol		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.41E+00	5.04E+00	1.01E+00	No
67	Acenaphthene			0	0	-	-	-	-	0	0	-	-	-	-	5.79E+02	5.79E+02	1.16E+02	No
68	Acenaphthylene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
69	Anthracene			0	0	-	-	-	-	0	0	-	-	-	-	2.33E+04	2.33E+04	4.67E+03	No
70	Benzidine			0	0	-	-	-	-	0	0	-	-	-	-	1.16E-04	1.16E-04	2.32E-05	No
71	Benzo(A)Anthracene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	3.79E-02	7.59E-03	No
72	Benzo(A)Pyrene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	3.79E-02	7.59E-03	No
73	Benzo(b)fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	1.07E-02	2.13E-03	No
74	Benzo(GHI)Perylene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
75	Benzo(K)Fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	1.07E-02	2.13E-03	No
76	Bis (2-Chloroethoxy) Methane			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
77	Bis (2-Chloroethyl)-Ether		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.07E-01	1.09E+00	2.19E-01	No
78	Bis (2-Chloroiso-Propyl) Ether			0	0	-	-	-	-	0	0	-	-	-	-	3.79E+04	3.78E+04	7.56E+03	No
79	Bis (2-Ethylhexyl) Phthalate		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.28E+00	4.56E+00	9.13E-01	No
80	4-Bromophenyl Phenyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
81	Butyl Benzyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	1.11E+03	1.13E+03	2.25E+02	No
82	2-Chloronaphthalene			0	0	-	-	-	-	0	0	-	-	-	-	9.24E+02	9.24E+02	1.85E+02	No
83	4-Chlorophenyl Phenyl Ether			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
84	Chrysene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	3.79E-02	7.59E-03	No
85	Di-N-Butyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	2.62E+03	2.62E+03	5.24E+02	No
86	Di-N-Octyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
87	Dibenzo(A,H)Anthracene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	3.79E-02	7.59E-03	No
88	1, 2-Dichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	7.55E+02	7.55E+02	1.51E+02	No
89	1, 3-Dichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	5.62E+02	5.62E+02	1.12E+02	No
90	1, 4-Dichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	1.12E+02	1.12E+02	2.25E+01	No
91	3, 3-Dichlorobenzidine		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.66E-02	5.92E-02	1.18E-02	No
92	Diethyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	2.56E+04	2.56E+04	5.11E+03	No
93	Dimethyl Phthalate			0	0	-	-	-	-	0	0	-	-	-	-	6.48E+05	6.48E+05	1.30E+05	No
94	2, 4-Dinitrotoluene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.96E+00	7.05E+00	1.41E+00	No
95	2, 6-Dinitrotoluene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
96	1,2-Diphenylhydrazine			0	0	-	-	-	-	0	0	-	-	-	-	1.17E-01	1.17E-01	2.34E-02	No
97	Endosulfan (alpha)		YES	0	0	0.220	0.220	0.044	No	0	0	0.056	0.056	0.011	No	5.13E+01	1.85E+02	3.69E+01	No
98	Endosulfan (beta)		YES	0	0	0.22	0.220	0.044	No	0	0	0.056	0.056	0.011	No	5.13E+01	1.85E+02	3.69E+01	No
99	Endosulfan sulfate		YES	0	0	-	-	-	-	0	0	-	-	-	-	5.13E+01	1.85E+02	3.69E+01	No
100	Endrin		YES	0	0	0.086	0.086	0.017	No	0	0	0.036	0.036	0.007	No	3.53E-02	1.26E-01	2.51E-02	No
101	Endrin Aldeyhde		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.76E-01	6.28E-01	1.26E-01	No
102	Fluoranthene			0	0	-	-	-	-	0	0	-	-	-	-	8.12E+01	8.12E+01	1.62E+01	No
103	Fluorene			0	0	-	-	-	-	0	0	-	-	-	-	3.11E+03	3.11E+03	6.22E+02	No
104	Heptochlor		YES	0	0	0.52	0.520	0.104	No	0	0	0.0038	0.004	0.001	No	4.83E-05	1.65E-04	3.30E-05	No
105	Heptachlor Epoxide		YES	0	0	0.52	0.520	0.104	No	0	0	0.0038	0.004	0.001	No	2.29E-05	8.15E-05	1.63E-05	No
106	Hexachlorobenzene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.68E-04	5.98E-04	1.20E-04	No
107	Hexachlorobutadiene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.08E+01	3.83E+01	7.66E+00	No
108	Hexachlorocyclohexan (alpha)		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.65E-03	1.01E-02	2.03E-03	No
109	Hexachlorocyclohexan (beta)		YES	0	0	-	-	-	-	0	0	-	-	-	-	9.97E-03	3.55E-02	7.10E-03	No
110	Hexachlorocyclohexan (gamma)		YES	0	0	0.95	0.950	0.190	No	0	0	-	-	-	-	1.08E+00	3.83E+00	7.67E-01	No
111	HexachlorocycloPentadiene			0	0	-	-	-	-	0	0	-	-	-	-	6.45E+02	6.45E+02	1.29E+02	No
112	Hexachloroethane			0	0	-	-	-	-	0	0	-	-	-	-	1.92E+00	1.92E+00	3.84E-01	No
113	Indeno(1, 2, 3-CK)Pyrene		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.07E-02	3.79E-02	7.59E-03	No
114	Isophorone			0	0	-	-	-	-	0	0	-	-	-	-	5.61E+02	5.61E+02	1.12E+02	No
115	Naphthalene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
116	Nitrobenzene			0	0	-	-	-	-	0	0	-	-	-	-	4.04E+02	4.04E+02	8.07E+01	No
117	N-Nitrosodi-N-Propylamine		YES	0	0	-	-	-	-	0	0	-	-	-	-	2.65E-01	1.05E+00	2.10E-01	No
118	N-Nitrosodimethylamine		YES	0	0	-	-	-	-	0	0	-	-	-	-	1.76E+00	6.27E+00	1.25E+00	No
119	N-Nitrosodiphenylamine		YES	0	0	-	-	-	-	0	0	-	-	-	-	3.50E+00	1.25E+01	2.49E+00	No
120	PCB-1016		YES	0	0	-	-	-	-	0	0	0.014	0.014	0.003	No	3.74E-05	1.33E-04	2.66E-05	No
121	PCB-1221		YES	0	0	-	-	-	-	0	0	0.014	0.014	0.003	No	3.74E-05	1.33E-04	2.66E-05	No
122	PCB-1232		YES	0	0	-	-	-	-	0	0	0.014	0.014	0.003	No	3.74E-05	1.33E-04	2.66E-05	No
123	PCB-1242		YES	0	0	-	-	-	-	0	0	0.014	0.014	0.003	No	3.74E-05	1.33E-04	2.66E-05	No
124	PCB-1248		YES	0	0	-	-	-	-	0	0	0.014	0.014	0.003	No	3.74E-05	1.33E-04	2.66E-05	No
125	PCB-1254		YES	0	0	-	-	-	-	0	0	0.014	0.014	0.003	No	3.74E-05	1.33E-04	2.66E-05	No
126	PCB-1260		YES	0	0	-	-	-	-	0	0	0.014	0.014	0.003	No	3.74E-05	1.33E-04	2.66E-05	No
127	Phenanthrene			0	0	-	-	-	-	0	0	-	-	-	-	-	-	-	-
128	Pyrene			0	0	-	-	-	-	0	0	-	-	-	-	2.33E+03	2.33E+03	4.67E+02	No
129	1, 2, 4-Trichlorobenzene			0	0	-	-	-	-	0	0	-	-	-	-	4.09E+01	4.09E+01	8.19E+00	No

Waste Load Allocation Summary

REQUEST INFORMATION

Request Number: 4065

From:	Victoria Kim	**In Branch/Section**	Industrial		
Date Submitted	4/17/2025	**Date Required**	5/17/2025	**FUND Code**	605
Date Permit application received by NPDES program	12/22/2023				
Receiving Waterbody	Unnamed Tributary to Little Osanippa Creek				
Previous Stream Name					
Facility Name	West Fraser Huguley	(Name of Discharger-WQ will use to file)			
		Previous Discharger Name			
River Basin	Chattahoochee	**Outfall Latitude**	32.815447	(decimal degrees)	
***County**	Chambers	**Outfall Longitude**	-85.223391	(decimal degrees)	
Permit Number	AL0084491	**Permit Type**	New Discharge and Permit		
		Permit Status	Proposed		
		Type of Discharger	INDUSTRIAL		
Do other discharges exist that may impact the model?	☐ Yes ☑ No				

If yes, impacting dischargers names.		**Impacting dischargers permit numbers.**	

Existing Discharge Design Flow		**MGD**	**Note: The flow rates given should be those requested for modeling.**
Proposed Discharge Design Flow	0.2095	**MGD**	

Comments Included ☐ Yes ☐ No

Information Verified By SH

Year File Was Created 2025

Response ID Number 2044

Lat/Long Method GPS/GIS

12 Digit HUC Code	031300021105		
Use Classification	F&W		
Site Visit Completed?	☑ Yes ☐ No	**Date of Site Visit**	5/1/2025
Waterbody Impaired?	☐ Yes ☑ No	**Date of WLA Response**	5/15/2025
Antidegradation	☑ Yes ☐ No	**Approved TMDL?**	☐ Yes ☑ No
Waterbody Tier Level	Tier II		
Use Support Category	3	**Approval Date of TMDL**	

Waste Load Allocation Information

Modeled Reach Length	6.08	**Miles**	**Date of Allocation**	5/15/2025	
Name of Model Used	SWQM		**Allocation Type**	Annual	
Model Completed by	Shae Holley		**Type of Model Used**	Desk-top	
Allocation Developed by	Water Quality Branch				

Waste Load Allocation Summary

Annual Effluent Limits

Qw	0.2095	MGD
CBOD5	4	
NH3-N	2	
TKN		
D.O.	6	

Conventional Parameters

Qw	MGD	Qw	MGD
Season		Season	
From		From	
Through		Through	
CBOD5		CBOD5	
NH3-N		NH3-N	
TKN		TKN	
D.O.		D.O.	

Other Parameters

Qw	MGD	Qw	MGD
Season		Season	
From		From	
Through		Through	
TP		TP	
TN		TN	
TSS		TSS	

"Monitor Only" Parameters for Effluent:

Parameter	Frequency	Parameter	Frequency
TKN	Monthly (Apr-Oct)		
TP	Monthly (Apr-Oct)		
NO2+NO3-N	Monthly (Apr-Oct)		

Water Quality Characteristics Immediately Upstream of Discharge

Parameter	Summer		Winter	
CBODu	2	mg/l		mg/l
NH3-N	0.11	mg/l		mg/l
Temperature	30	°C		°C
pH	7	su		su

Hydrology at Discharge Location

			Method Used to Calculate
Drainage Area	0.65	sq mi	
Stream 7Q10	0	cfs	<5.0 sq mi - Bingham Equation
Stream 1Q10	0	cfs	<5.0 sq mi - Bingham Equation
Stream 7Q2	0	cfs	<5.0 sq mi - Bingham Equation
Annual Average	0.83	cfs	ADEM Estimate w/USGS Gage Data

Drainage Area Qualifier: Exact

Comments and/or Notations

ANTIDEGRADATION RATIONALE

Permit Number:	**AL0084491**
Facility Name:	**West Fraser Huguley**
Receiving water:	**Unnamed Tributary to Little Osanippa Creek**
Stream Category:	**Tier 2 as defined by ADEM Admin. Code 335-6-10-.12**
Discharge Description:	**Stormwater associated with Oriented Strand Board (OSB) manufacturing operations, including boiler blowdown, ash cooling water, and pad washdown activities.**

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

The Department has reviewed the information submitted by applicant in accordance with ADEM Admin. Code 335-6-10-.12 (9). The applicant has demonstrated that there are no alternative options which are economically feasible or technically viable. In the case of technically viable options, the applicant has shown them to be cost prohibitive through the alternatives analysis required by the permit application.

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

- The proposed discharge will continue to create approximately 129 employment opportunities.
- The facility will continue to generate approximately $1,000,000 in state and local tax revenue.

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

Prepared By: Scott Jackson
Date: June 9, 2025

Kim, Victoria P

Subject: FW: [External] AL0084491 Draft Permit
Attachments: Request for Clarification - WF Huguley.pdf

From: Jonathan Foster <Jonathan.Foster@westfraser.com>
Sent: Thursday, August 7, 2025 3:36 PM
To: Kim, Victoria P <victoria.kim@adem.alabama.gov>
Cc: Kris Waikins <Kristine.Waikins@westfraser.com>; Phillip Starrett Jr. <Phillip.StarrettJr@westfraser.com>
Subject: Re: [External] AL0084491 Draft Permit

Victoria,

Please see the attached response letter for the draft NPDES individual permit for West Fraser Huguley.

Thank you!

Jonathan Foster | EHS Supervisor

West Fraser

4400 Barton Industrial Blvd | Lanett, AL 36863

Main Office: 334.576.1500 | Cell: 912.777.2919 |
westfraser.com

From: Kim, Victoria P <victoria.kim@adem.alabama.gov>
Sent: Tuesday, July 15, 2025 10:04 AM
To: Jonathan Foster <Jonathan.Foster@westfraser.com>
Cc: Joshua Ojagbeghru <Joshua.Ojagbeghru@westfraser.com>; Riley McCullough <Riley.McCullough@westfraser.com>; Kris Waikins <Kristine.Waikins@westfraser.com>
Subject: [External] AL0084491 Draft Permit

Hello,

Please find an electronic copy of the draft permit.

Please let me know if you have any comments or questions.

Thank you.

Victoria Kim
Industrial Section
Industrial/Municipal Branch
Water Division
Alabama Department of Environmental Management

Work Phone: (334) 271-7895
Email: victoria.kim@adem.alabama.gov
Mailing Address:
Post Office Box 301463
Montgomery, Alabama 36130-1463

ADEM
Mission: Assure for all citizens of the state a safe, healthful and productive environment

----------EOP----------

Thank you

West Fraser

4400 Barton Industrial Blvd
Lanett, AL 36863
Phone: (334) 576-1500
www.westfraser.com

July 29, 2025

via email: victoria.kim@adem.alabama.gov

Ms. Victoria Kim
Industrial Section, Industrial/Municipal Branch
Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, Alabama 36130-1463

Subject: Request for Clarification – $CBOD_5$ Monitoring Rationale and Removal of Continuous Flow - West Fraser EWP – Huguley NPDES Individual Wastewater Permit – AL0084491

Dear Ms. Kim,

Upon review of the draft permit, West Fraser has two formal requests. The first is a request for clarification to aid understanding of the requirement to monitor carbonaceous biochemical demand ($CBOD_5$). The second is due to the intermittent nature of the discharge, the request the requirement for composite sampling be removed and replaced by grab sampling. More details on the requests follow.

1. Requirement to Monitor for CBOD5 Clarification

The draft permit includes $CBOD_5$ as a required effluent parameter, with limits established through the May 2025 waste load allocation (WLA) and expressed as 1.5 times the monthly average limit, based on Best Professional Judgment (BPJ). West Fraser recognize that the WLA and BPJ are valid mechanisms under permitting frameworks, particularly when facility-specific sampling data are limited or unavailable.

However, West Fraser would appreciate further clarification as to why $CBOD_5$ was selected for this facility specifically, considering that $CBOD_5$ monitoring is not a common requirement across the wood products sector. A better understanding of the technical justification will help the facility align its monitoring efforts and provide accurate training to site staff.

2. Request for Removal of Composite Sampling Requirements

In the "Facility Operational Characteristics" section of the application, the facility discharge was initially designated as "continuous" based on daily average runoff calculations derived with input of annual rainfall averaged over a daily basis. This methodology was used for water balancing purposes and consistent reporting of flow rates. However, this selection does not accurately reflect the true nature of the discharge. Water discharges from this outfall intermittently, and the discharge is heavily rainfall-dependent.

The facility selected "intermittent" in the "Outfalls" section, and would like to confirm that the overall application appropriately reflects the discharge nature as seasonal and rainfall-driven, not continuous. We trust that this clarification is helpful in avoiding mischaracterization of the flow through the outfall.

Additionally, due to the remote location of the sampling point, a composite sampler would be difficult to stage. Also, several other West Fraser wood products mills have Individual NPDES permits that allow for grab sampling. As such, the facility requests the removal of composite sampling requirements for the outfall.

We appreciate ADEM's consideration and would welcome any further discussion if needed to support finalization of the permit. If additional information is required or if a follow-up call would be beneficial, please don't hesitate to contact either Jonathan Foster at jonathan.foster@westfraser.com or me at phillip.starrettjr@westfraser.com.

Sincerely,

Phillip Starrett, Jr.
General Manager
West Fraser EWP – Huguley
phillip.starrettjr@westfraser.com
334-576-1500

NPDES Individual Permit Application (Form 187) - Initial Issuance for Industrial Facilities

version 2.9

(Submission #: HPW-RW4A-88HF3, version 3)

Details

Submission ID HPW-RW4A-88HF3
Status In Process

Fees

Default Fee	$5,615.00
Payments/Adjustments	($5,615.00)
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 for industrial activity?
No

General Information

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

NPDES or General Permit Numbers (if applicable, please list all permit numbers):
ALG060373

Select all discharge types that are applicable for this site/facility:
Discharge of Process Water Commingled with Stormwater

Permittee Information

Permittee

Permittee Name
West Fraser US EWP LLC

Mailing Address
4400 BARTON INDUSTRIAL BLVD
LANETT, AL 36863

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

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

Responsible Official

Prefix
Mr.

First Name	Last Name
Phillip	Starrett, Jr

Title
General Manager

Organization Name
West Fraser US EWP LLC

Phone Type	Number	Extension
Business	3345761500	

Email
phillip.starrettjr@westfraser.com

Mailing Address

4400 BARTON INDUSTRIAL BLVD

Lanett, AL 36863

Does the Responsible Official intend to delegate signatory authority for DMRs or other compliance reports to an individual as a duly authorized representative (DAR) for this site?
Yes

Pursuant to ADEM Admin. Code r. 335-6-6-.09(2), a person may ONLY be delegated signatory authority for reports if that person has responsibility for the overall operation of the regulated facility or regulated activity. Once such delegation is made, that person is considered a duly authorized representative (DAR).

Duly Authorized Representative (DAR)

Delegation Document for Duly Authorized Representation (DAR)
Delegation of Authority for Environmental Reporting letter 2024.pdf - 12/02/2024 03:36 PM
Comment
NONE PROVIDED

Pursuant to ADEM Admin. Code r. 335-6-6-.09(2), a person may ONLY be delegated signatory authority for reports if that person has responsibility for the overall operation of the regulated facility or activity. Once such delegation is made, that person is considered a duly authorized representative (DAR).

Authorized Rep

Prefix
Mr.

First Name	Last Name
Phillip	Starrett, Jr.

Title
General Manager

Organization Name
West Fraser US EWP LLC

Phone Type	Number	Extension
Business	334-576-1500	

Email
phillip.starrettjr@westfraser.com

Mailing Address

4400 Barton Industrial Blvd

Lanett, AL 36863

United States

Facility/Site Information

Facility/Site Name
West Fraser Huguley

Organization/Ownership Type
Corporation

Facility/Site Address or Location Description

4400 BARTON INDUSTRIAL BLVD

LANETT, AL 36863

Facility/Site County
Chambers

Detailed Directions to the Facility/Site
The Huguley facility is located in southeast Chambers County, south of the Town of Huguley, approximately 0.75 miles west from the intersection of Interstate I-85 and Phillips Road. The site is located in the southeast quarter of Section 10, Township 21 North, and Range 28 East. The main access to the plant site is Barton Industrial Boulevard directly off Phillips Road.

Headed north on Intersate 85, take exit 77 toward Valley/Lanett. Turn west onto Fob James Drive and continue west for approximately 0.56 miles. Turn left onto Barton Industrial Boulevard and continue for approximately 0.70 miles to arrive.

Facility Map

aerial.png - 08/09/2023 11:22 AM

Comment
Google Earth Aerial

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

Facility/Site Front Gate Latitude and Longitude
32.824858,-85.221327

4400 Barton Industrial Boulevard, Lanett, AL

SIC Code(s) [Please enter Primary SIC Code first followed by any additional applicable SIC Codes]
2493-Reconstituted Wood Products

NAICS Code(s) [Please enter Primary NAICS Code first followed by any additional applicable NAICS Codes]
321219-Reconstituted Wood Product Manufacturing

Facility/Site Contact

Prefix
Mr.

First Name	Last Name
Phillip	Starrett Jr

Title
General Manager

Organization Name
West Fraser US EWP LLC

Phone Type	Number	Extension
Business	334-576-1500	

Email
phillip.starrettjr@westfraser.com

Address
4400 Barton Industrial Blvd
LANETT, AL 36863

DMR Contact(s) (1 of 2)

DMR Contact

Prefix
Mr.

First Name	Last Name
Jonathan	Foster

Title
Environmental Technician

Phone Type	Number	Extension
Business	334-576-1500	

Email
jonathan.foster@westfraser.com

Address
4400 Barton Industrial Blvd.
Lanett, AL 36863

DMR Contact(s) (2 of 2)

DMR Contact

Prefix
Mr.

First Name	Last Name
Phillip	Starrett Jr

Title
General Manager

Phone Type	Number	Extension
Business	3345761500	

Email
phillip.starrettjr@westfraser.com

Address
4400 BARTON INDUSTRIAL BLVD
LANETT, AL 36863

Applicant Business Entity Information

Address of Incorporation
West Fraser US EWP LLC
4400 Barton Industrial Blvd
Lanett, AL 36863

Agent Designated by the Corporation for Purposes of Service

Name	Address
The Corporation Company	60 Commerce Street, Suite 1100 Montgomery, AL 36104

Please provide all corporate officers

Name	Title	Address
Robin Lampard	President	1 Toronto Street, Suite 600, Toronto, ON M5C 2W4
Kevin Burke	Vice President	4400 Barton Industrial Blvd., Lanett, Alabama, USA 36863
Charles Watkins	VP Capital and Technology	885 West Georgia Street, Suite 1500, Vancouver, B.C. V6C 3E8
Scott Pearson	Regional Manager	885 West Georgia Street, Suite 1500, Vancouver, B.C. V6C 3E8
Anil Aggarwala	Treasurer	885 West Georgia Street, Suite 1500, Vancouver, B.C. V6C 3E8
Anthony Ventrini	Assistant Treasurer	1900 Exeter Road, Suite 105, Germantown, TN 38138
Tracy Connelly McGilley	Secretary	1 Toronto Street, Suite 600, Toronto, ON M5C 2W4
Phillip Starrett, Jr.	General Manager	4400 Barton Industrial Blvd., Lanett, Alabama, USA 36863

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

Parent Corporation of Applicant

Name	Address
West Fraser (USA) Inc.	1900 Exeter Road, Suite 105 Germantown, TN 38138
West Fraser Inc.	1900 Exeter Road, Suite 105 Germantown, TN 38138

Does the applicant applying for coverage have Subsidiary Corporations?
No

Enforcement History

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

Identify all Notices of Violation, Orders (Consent or Administrative/Unilateral), or Judicial Actions (Complaint, Settlement Agreement, Consent Decree, or Court Order) concerning water pollution or other permit violations, if any, against the Applicant within the State of Alabama in the past five years.

Facility/Site Name	Permit Number, If Applicable	Type of Action	Date of Action
West Fraser Huguley	302-0018	Notice of Violation	08/25/2023
West Fraser Huguley	302-0018	Notice of Violation	02/07/2024
West Fraser Huguley	302-0018	Notice of Violation	03/05/2024

Business Activity

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

in.
Industrial Section Assignment Map

If your facility conducts or will be conducting any of the processes listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), please check the category of business activity:
Other: OSB does not fall under the timber products categorical group.

Give a brief description of all operations at this facility including primary products or services:
Huguley manufactures oriented strand board (OSB) from wood, resin, and wax, pressed at approximately 400 F. The facility's Standard Industrial Classification (SIC) Code is 2493, Reconstituted Wood Products.

Water Supply

Water Sources (check all that apply):
Municipal Water Utility
Private Well

Please specify the City of the Municipal Water Utility:
Huguley

Name of Utility	Million Gallons per Day (MGD)
Huguley Water, Sewer & Fire Protection Authority	0.3335

Well ID	Private Well in Million Gallons per Day (MGD)
Well #1	0.025
Well #2	0.025
	Sum: 0.05

Cooling Water Intake Structure Information

Does the provider of your source water operate a surface water intake?
No

Outfalls (1 of 1)

001

Outfall Identifier
001

Receiving Water
Osanippa Creek

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

Indicate if either of the following characteristics apply to this discharge:
Intermittent Discharge

Monitoring/Sampling Point Location
32.816683,-85.224367

Process Flow Schematic with Wastewater Treatment(s), If Applicable

For an example of a process flow diagram, please use the link below.
Figure 1: Example of Process Flow Schematic

Process Flow Schematic

Figure 3 - Water Balance and Process Flow Diagram Rev.pdf - 12/02/2024 01:51 PM

Comment

NONE PROVIDED

Anti-Degradation Evaluation

Is this a new or increased discharge that began after April 3, 1991?

Yes

Has an Anti-Degradation Analysis been previously conducted and submitted to the Department for the new or increased discharge referenced above?

No

NOTE

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

What environmental or public health problem will the discharger be correcting?

Properly permitting discharges of allowable industrial wastwater and stormwater.

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

0

How much reduction in employment will the discharger be avoiding?

0

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

0

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

0

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

0

Attach Form 311, Form 312, or Form 313

Form313_POTW.pdf - 10/31/2024 06:41 AM

WF EWP Huguley Form 311 Stamped.pdf - 11/01/2024 10:34 AM

Comment

Form 311, certified by Oliver S. Neal, PE 54285

Additional Information

Do you share an outfall with another facility?

No

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

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

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

Planned	Yes/No
Continuous Wastewater Flow Metering Equipment	No

Planned	Yes/No
Automatic Sampling Equipment	No

Please describe the equipment below:
The flow from this location is intermittent and not continuous.

Please attach the process schematic with sampling equipment locations.
Figure 3 - Water Balance and Process Flow Diagram Rev.pdf - 12/02/2024 01:53 PM
Comment
NONE PROVIDED

Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics (Consider production processes as well as air or water pollution treatment processes that may affect the discharge.)?
No

Do you use biocides, corrosion inhibitors, or chemical additives in your cooling or blowdown water?
Yes

The applicant must provide a list of the following information for each biocide or chemical:

(1) Name and general composition of biocide or chemical (if composition is not provided on MSDS sheet)
(2) 48-hour or 96-hour LC50 data for organisms representative of the biota of the waterway into which the discharge will ultimately reach. For freshwater, the fathead minnow (Pimephales promelas) and cladoceran (Ceriodaphnia dubia) are the test organisms. For salt water, the mysid shrimp and the sheepshead minnow or inland silverside are the test organisms. Other acceptable aquatic organisms may be allowed by the Department if sufficient information is provided. If the MSDS sheet does not provide data for the organisms specified above, the facility must provide the data unless the Department grants approval for an alternate organism.
(3) Quantities to be used
(4) Frequencies of use
(5) Maximum proposed discharge concentrations
(6) EPA registration of number, if applicable and is not provided on the MSDS sheet.

List of Biocides

Please list biocides below:
Not Applicable

Safety Data Sheets (SDS)
Chem-Aqua Boiler Treatment.pdf - 12/20/2023 12:02 PM
Comment
Non-biocide chemicals potentially found in boiler blowdown:
ChemAqua 10268
ChemAqua 13140
ChemAqua 11590
ChemAqua 18106
Morton Clean and Protect Water Softener Pellets

Treatment

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

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

Facility Operational Characteristics

Indicate whether the facility discharge is:
Continuous through the year

Comments:
NONE PROVIDED

Non-Discharged Wastes

Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?
Yes

Waste Generated	Quantity (lbs/day)	Disposal Method	On-Site or Off-Site?	If Off-Site, Identify the Facility:
Paint	50	Solidified and Landfilled	Off-Site	Environmental Recycling and Solutions
Used Oil	27	Recycled	Off-Site	McPherson Oil Products
Used Oil Absorbents	2	Drained, solidified, and landfilled	Off-Site	Environmental Recycling and Solutions

Does any outside firm remove any of the above checked wastes?
Yes

Hauler Information

Name	Address	City	State	Zip
Environmental Recycling and Solutions	1902 Market Street	Opelika	AL	36801
McPherson Oil Products	5051 Cardinal Street	Trussville	AL	35173

EPA Application Forms

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

Form 1 - General Information Form required for all applications

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

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

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

Form 2F - Should be submitted for all discharges of storm water associated with an industrial activity.

The EPA application forms are found on the Department's website here.

EPA Form 1
form_1_epa_form_3510-1 executed.pdf - 12/02/2024 02:14 PM
Comment
NONE PROVIDED

Additional EPA Forms (EPA Form 2C, 2D, 2E and/or 2F)
form_2f_epa_form_3510-executed.pdf - 12/02/2024 02:15 PM
form_2c.pdf - 02/10/2025 06:14 AM
Comment
NONE PROVIDED

Other attachments (as needed)
West Fraser Huguley NPDES Application Supplemental Information.pdf - 12/02/2024 01:57 PM
Comment
NONE PROVIDED

Additional Attachments

Please attach any additional information as needed.
Signed 2023 IND SW Permit app. cover letter.pdf - 12/22/2023 07:10 AM
Comment
NONE PROVIDED

Application Preparer

Application Preparer

Prefix
Mr.

First Name **Last Name**
Jeffrey McBride

Title
CEO

Organization Name
Odyssey EHS

Phone Type **Number** **Extension**
Mobile 318-732-0979

Email
jeffrey@odysseyehs.com

Address
PO BOX 1892
West Monroe, LA 71294

Attachments

Date	Attachment Name	Context	Confidential?	User
2/10/2025 6:14 AM	form_2c.pdf	Attachment	No	Jonathan Foster
12/2/2024 3:36 PM	Delegation of Authority for Environmental Reporting letter 2024.pdf	Attachment	No	Jeffrey McBride
12/2/2024 2:15 PM	form_2f_epa_form_3510-executed.pdf	Attachment	No	Jeffrey McBride
12/2/2024 2:14 PM	form_1_epa_form_3510-1 executed.pdf	Attachment	No	Jeffrey McBride
12/2/2024 1:57 PM	West Fraser Huguley NPDES Application Supplemental Information.pdf	Attachment	No	Jeffrey McBride
12/2/2024 1:53 PM	Figure 3 - Water Balance and Process Flow Diagram Rev.pdf	Attachment	No	Jeffrey McBride
12/2/2024 1:51 PM	Figure 3 - Water Balance and Process Flow Diagram Rev.pdf	Attachment	No	Jeffrey McBride
11/1/2024 10:34 AM	WF EWP Huguley Form 311 Stamped.pdf	Attachment	No	Jonathan Foster
10/31/2024 6:41 AM	Form313_POTW.pdf	Attachment	No	Jonathan Foster
12/22/2023 7:10 AM	Signed 2023 IND SW Permit app. cover letter.pdf	Attachment	No	Jonathan Foster
12/20/2023 12:02 PM	Chem-Aqua Boiler Treatment.pdf	Attachment	No	Jonathan Foster
8/9/2023 11:22 AM	aerial.png	Attachment	No	Leyton Lamb

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 and imprisonment for knowing violations."

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

NOTE: 335-6-5-.14 SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS.
The application for a permit shall be signed by a responsible official, a request for varience from categorical pretreatment standards, and a category determination request shall be signed b a responsible official, as indicated below:

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

Signed By phillip starrett on 02/10/2025 at 7:26 AM

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110010108141	N/A	West Fraser EWP - Huguley	

Form 1 NPDES	EPA	U.S. Environmental Protection Agency Application for NPDES Permit to Discharge Wastewater **GENERAL INFORMATION**

SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(f) and (f)(1))

Activities Requiring an NPDES Permit

1.1 Applicants *Not Required* to Submit Form 1

1.1.1	Is the facility a new or existing **publicly owned treatment works?** If yes, STOP. Do NOT complete Form 1. Complete Form 2A. ☑ No	1.1.2	Is the facility a new or existing **treatment works treating domestic sewage?** If yes, STOP. Do NOT complete Form 1. Complete Form 2S. ☑ No

1.2 Applicants *Required* to Submit Form 1

1.2.1	Is the facility a **concentrated animal feeding operation** or a **concentrated aquatic animal production facility?** ☐ Yes → Complete Form 1 ***and*** Form 2B. ☑ No	1.2.2	Is the facility an **existing** manufacturing, commercial, mining, or silvicultural **facility** that **is currently discharging process wastewater**? ☑ Yes → Complete Form 1 ***and*** Form 2C. ☐ No
1.2.3	Is the facility a **new** manufacturing, commercial, mining, or silvicultural **facility** that has **not yet commenced to discharge**? ☐ Yes → Complete Form 1 ***and*** Form 2D. ☑ No	1.2.4	Is the facility a **new or existing** manufacturing, commercial, mining, or silvicultural **facility** that **discharges only nonprocess wastewater**? ☐ Yes → Complete Form 1 ***and*** Form 2E. ☑ No
1.2.5	Is the facility a **new or existing facility** whose discharge is composed entirely of **stormwater associated with industrial activity** or whose discharge is composed of **both stormwater and non-stormwater**? ☑ Yes → Complete Form 1 ***and*** Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). ☐ No		

SECTION 2. NAME, MAILING ADDRESS, AND LOCATION (40 CFR 122.21(f)(2))

Name, Mailing Address, and Location

2.1 Facility Name

West Fraser EWP - Huguley

2.2 EPA Identification Number

110010108141

2.3 Facility Contact

Name (first and last)	Title	Phone number
Jonathan Foster	Environmental Technician	(334) 576-1500

Email address
jonathan.foster@westfraser.com

2.4 Facility Mailing Address

Street or P.O. box
4400 Barton Industrial Blvd.

City or town	State	ZIP code
Lanett	AL	36863

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110010108141	N/A	West Fraser EWP - Huguley	

Name, Mailing Address, and Location Continued

2.5	**Facility Location**		
	Street, route number, or other specific identifier 4400 Barton Industrial Blvd		
	County name Chambers	County code (if known)	
	City or town Lanett	State AL	ZIP code 36863

SECTION 3. SIC AND NAICS CODES (40 CFR 122.21(f)(3))

SIC and NAICS Codes

3.1	**SIC Code(s)**	**Description** (optional)
	2493	Reconstituted Wood Products

3.2	**NAICS Code(s)**	**Description** (optional)
	321219	Reconstituted Wood Product Manufacturing

SECTION 4. OPERATOR INFORMATION (40 CFR 122.21(f)(4))

Operator Information

4.1	**Name of Operator**
	West Fraser EWP - Huguley

4.2	Is the name you listed in Item 4.1 also the owner?
	☐ Yes ☑ No

4.3	**Operator Status**
	☐ Public—federal ☐ Public—state ☐ Other public (specify)_____ ☑ Private ☐ Other (specify) _____

4.4	**Phone Number of Operator**
	(334) 576-1500

Operator Information Continued

4.5	**Operator Address**		
	Street or P.O. Box 4400 Barton Industrial Blvd		
	City or town Lanett	State AL	ZIP code 36863
	Email address of operator N/A		

SECTION 5. INDIAN LAND (40 CFR 122.21(f)(5))

Indian Land

5.1	Is the facility located on Indian Land?
	☐ Yes ☑ No

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110010108141	N/A	West Fraser EWP - Huguley	

SECTION 6. EXISTING ENVIRONMENTAL PERMITS (40 CFR 122.21(f)(6))

Existing Environmental Permits

6.1 **Existing Environmental Permits** (check all that apply and print or type the corresponding permit number for each)

☑ NPDES (discharges to surface water) ALG060373	☑ RCRA (hazardous wastes) ALR00017855	☐ UIC (underground injection of fluids)
☐ PSD (air emissions)	☐ Nonattainment program (CAA)	☑ NESHAPs (CAA) AL0000000101700018
☐ Ocean dumping (MPRSA)	☐ Dredge or fill (CWA Section 404)	☑ Other (specify) TRI - 36863NRBRD4400B

SECTION 7. MAP (40 CFR 122.21(f)(7))

Map

7.1 Have you attached a topographic map containing all required information to this application? (See instructions for specific requirements.)

☑ Yes ☐ No ☐ CAFO—Not Applicable (See requirements in Form 2B.)

SECTION 8. NATURE OF BUSINESS (40 CFR 122.21(f)(8))

Nature of Business

8.1 Describe the nature of your business.

West Fraser US EWP, LLC. operates an Oriented Strand Board (OSB) manufacturing facility in Huguley, Alabama. The facility operations include those associated with green wood handling/processing, green wood drying, dry strand blending, mat forming and pressing, and board finishing.

SECTION 9. COOLING WATER INTAKE STRUCTURES (40 CFR 122.21(f)(9))

Cooling Water Intake Structures

9.1 Does your facility use cooling water?

☑ Yes ☐ No ➔ SKIP to Item 10.1.

9.2 Identify the source of cooling water. (Note that facilities that use a cooling water intake structure as described at 40 CFR 125, Subparts I and J may have additional application requirements at 40 CFR 122.21(r). Consult with your NPDES permitting authority to determine what specific information needs to be submitted and when.)

The facility uses potable water to cool ash prior to transporting it for disposal or recycling. The water is piped to the site via underground piping from a local municipality.

SECTION 10. VARIANCE REQUESTS (40 CFR 122.21(f)(10))

Variance Requests

10.1 Do you intend to request or renew one or more of the variances authorized at 40 CFR 122.21(m)? (Check all that apply. Consult with your NPDES permitting authority to determine what information needs to be submitted and when.)

☐ Fundamentally different factors (CWA Section 301(n))	☐ Water quality related effluent limitations (CWA Section 302(b)(2))
☐ Non-conventional pollutants (CWA Section 301(c) and (g))	☐ Thermal discharges (CWA Section 316(a))
☑ Not applicable	

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
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SECTION 11. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

11.1 In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.

Column 1	Column 2
☑ Section 1: Activities Requiring an NPDES Permit	☐ w/ attachments
☑ Section 2: Name, Mailing Address, and Location	☐ w/ attachments
☑ Section 3: SIC Codes	☐ w/ attachments
☑ Section 4: Operator Information	☐ w/ attachments
☑ Section 5: Indian Land	☐ w/ attachments
☑ Section 6: Existing Environmental Permits	☐ w/ attachments
☑ Section 7: Map	☑ w/ topographic map ☐ w/ additional attachments
☑ Section 8: Nature of Business	☐ w/ attachments
☑ Section 9: Cooling Water Intake Structures	☐ w/ attachments
☑ Section 10: Variance Requests	☐ w/ attachments
☑ Section 11: Checklist and Certification Statement	☐ w/ attachments

11.2 **Certification Statement**

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

Name (print or type first and last name)	Official title
Phillip Starett, Jr	General Manager
Signature	**Date signed**
Phillip Starett	Digitally signed by Phillip Starrett Jr. DN: CN=Phillip Starrett Jr., E=phillip.starrettjr@westfraser.com Reason: I am the author of this document Location: Date: 2024.12.02 13:37:26-05'00' Foxit PDF Editor Version: 2024.3.0

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110010108141	N/A	West Fraser EWP - Huguley	

Form 2C NPDES

EPA

U.S. Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater
EXISTING MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURE OPERATIONS

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1))

Outfall Location

1.1 Provide information on each of the facility's outfalls in the table below.

Outfall Number	Receiving Water Name	Latitude	Longitude
001	Little Osanippa Creek	32° 49′ 12.79″ N	-85° 13′ 31.82″
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″

SECTION 2. LINE DRAWING (40 CFR 122.21(g)(2))

Line Drawing

2.1 Have you attached a line drawing to this application that shows the water flow through your facility with a water balance? (See instructions for drawing requirements. See Exhibit 2C–1 at end of instructions for example.)

☐ Yes ☑ No

SECTION 3. AVERAGE FLOWS AND TREATMENT (40 CFR 122.21(g)(3))

Average Flows and Treatment

3.1 For each outfall identified under Item 1.1, provide average flow and treatment information. Add additional sheets if necessary.

****Outfall Number**** 001

Operations Contributing to Flow

Operation	Average Flow
Ash Screw	0.023 mgd
Pavement Washing	0.020 mgd
Industrial Stormwater	0.068 mgd
Boiler Blowdown	0.1035 mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
On-site retention pond sedimentation	1-U	N/A
Screening	1-T	N/A

Average Flows and Treatment Continued

3.1 cont.

****Outfall Number**** N/A

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
N/A		

****Outfall Number**** N/A

Operations Contributing to Flow

Operation	Average Flow
	mgd
	mgd
	mgd
	mgd

Treatment Units

Description (include size, flow rate through each treatment unit, retention time, etc.)	Code from Table 2C-1	Final Disposal of Solid or Liquid Wastes Other Than by Discharge
N/A		

System Users

3.2 Are you applying for an NPDES permit to operate a privately owned treatment works?

☐ Yes ☑ No ➔ SKIP to Section 4.

3.3 Have you attached a list that identifies each user of the treatment works?

☐ Yes ☐ No

SECTION 4. INTERMITTENT FLOWS (40 CFR 122.21(g)(4))

Intermittent Flows

4.1 Except for storm runoff, leaks, or spills, are any discharges described in Sections 1 and 3 intermittent or seasonal?

☑ Yes ☐ No ➔ SKIP to Section 5.

4.2 Provide information on intermittent or seasonal flows for each applicable outfall. Attach additional pages, if necessary.

Outfall Number	Operation (list)	Frequency		Flow Rate		Duration
		Average Days/Week	Average Months/Year	Long-Term Average	Maximum Daily	
001	Contact Cooling Water	7 days/week	12 months/year	0.023 mgd	0.023 mgd	0.08 days
	Pavement Wash Water	7 days/week	12 months/year	0.015 mgd	0.02 mgd	0.08 days
	Stormwater	2.2 days/week	12 months/year	0.068 mgd	4.14 mgd	2.2 days
001	Boiler Blowdown	7 days/week	12 months/year	0.1035 mgd	0.1035 mgd	1.0 days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days
		days/week	months/year	mgd	mgd	days

SECTION 5. PRODUCTION (40 CFR 122.21(g)(5))

Applicable ELGs

5.1 Do any effluent limitation guidelines (ELGs) promulgated by EPA under Section 304 of the CWA apply to your facility?

☐ Yes ☑ No ➔ SKIP to Section 6.

5.2 Provide the following information on applicable ELGs.

ELG Category	ELG Subcategory	Regulatory Citation

Production-Based Limitations

5.3 Are any of the applicable ELGs expressed in terms of production (or other measure of operation)?

☐ Yes ☐ No ➔ SKIP to Section 6.

5.4 Provide an actual measure of daily production expressed in terms and units of applicable ELGs.

Outfall Number	Operation, Product, or Material	Quantity per Day	Unit of Measure

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110010108141	N/A	West Fraser EWP - Huguley	

SECTION 6. IMPROVEMENTS (40 CFR 122.21(g)(6))

Upgrades and Improvements

6.1 Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?

☐ Yes ☑ No ➔ SKIP to Item 6.3.

6.2 Briefly identify each applicable project in the table below.

Brief Identification and Description of Project	Affected Outfalls (list outfall number)	Source(s) of Discharge	Final Compliance Dates	
			Required	Projected

6.3 Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? *(optional item)*

☐ Yes ☑ No ☐ Not applicable

SECTION 7. EFFLUENT AND INTAKE CHARACTERISTICS (40 CFR 122.21(g)(7))

Effluent and Intake Characteristics

See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.

Table A. Conventional and Non-Conventional Pollutants

7.1 Are you requesting a waiver from your NPDES permitting authority for one or more of the Table A pollutants for any of your outfalls?

☐ Yes ☑ No ➔ SKIP to Item 7.3.

7.2 If yes, indicate the applicable outfalls below. Attach waiver request and other required information to the application.

Outfall Number _____ Outfall Number _____ Outfall Number _____

7.3 Have you completed monitoring for all Table A pollutants at each of your outfalls for which a waiver has not been requested and attached the results to this application package?

☑ Yes ☐ No; a waiver has been requested from my NPDES permitting authority for all pollutants at all outfalls.

Table B. Toxic Metals, Cyanide, Total Phenols, and Organic Toxic Pollutants

7.4 Do any of the facility's processes that contribute wastewater fall into one or more of the primary industry categories listed in Exhibit 2C-3? (See end of instructions for exhibit.)

☑ Yes ☐ No ➔ SKIP to Item 7.8.

7.5 Have you checked "Testing Required" for all toxic metals, cyanide, and total phenols in Section 1 of Table B?

☑ Yes ☐ No

7.6 List the applicable primary industry categories and check the boxes indicating the required GC/MS fraction(s) identified in Exhibit 2C-3.

Primary Industry Category	Required GC/MS Fraction(s) (Check applicable boxes.)			
Timber Products Processing	☑ Volatile	☑ Acid	☑ Base/Neutral	☑ Pesticide
	☐ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide
	☐ Volatile	☐ Acid	☐ Base/Neutral	☐ Pesticide

Effluent and Intake Characteristics Continued

7.7	Have you checked "Testing Required" for all required pollutants in Sections 2 through 5 of Table B for each of the GC/MS fractions checked in Item 7.6? ☑ Yes ☐ No
7.8	Have you checked "Believed Present" or "Believed Absent" for all pollutants listed in Sections 1 through 5 of Table B where testing is not required? ☑ Yes ☐ No
7.9	Have you provided (1) quantitative data for those Section 1, Table B, pollutants for which you have indicated testing is required or (2) quantitative data or other required information for those Section 1, Table B, pollutants that you have indicated are "Believed Present" in your discharge? ☑ Yes ☐ No
7.10	Does the applicant qualify for a small business exemption under the criteria specified in the instructions? ☐ Yes ➔ Note that you qualify at the top of Table B, then SKIP to Item 7.12. ☑ No
7.11	Have you provided (1) quantitative data for those Sections 2 through 5, Table B, pollutants for which you have determined testing is required or (2) quantitative data or an explanation for those Sections 2 through 5, Table B, pollutants you have indicated are "Believed Present" in your discharge? ☑ Yes ☐ No
Table C. Certain Conventional and Non-Conventional Pollutants	
7.12	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed on Table C for all outfalls? ☑ Yes ☐ No
7.13	Have you completed Table C by providing (1) quantitative data for those pollutants that are limited either directly or indirectly in an ELG and/or (2) quantitative data or an explanation for those pollutants for which you have indicated "Believed Present"? ☑ Yes ☐ No
Table D. Certain Hazardous Substances and Asbestos	
7.14	Have you indicated whether pollutants are "Believed Present" or "Believed Absent" for all pollutants listed in Table D for all outfalls? ☑ Yes ☐ No
7.15	Have you completed Table D by (1) describing the reasons the applicable pollutants are expected to be discharged and (2) by providing quantitative data, if available? ☑ Yes ☐ No
Table E. 2,3,7,8-Tetrachlorodibenzo-p-Dioxin (2,3,7,8-TCDD)	
7.16	Does the facility use or manufacture one or more of the 2,3,7,8-TCDD congeners listed in the instructions, or do you know or have reason to believe that TCDD is or may be present in the effluent? ☑ Yes ➔ Complete Table E. ☐ No ➔ SKIP to Section 8.
7.17	Have you completed Table E by reporting *qualitative* data for TCDD? ☑ Yes ☐ No

SECTION 8. USED OR MANUFACTURED TOXICS (40 CFR 122.21(g)(9))

Used or Manufactured Toxics

8.1	Is any pollutant listed in Table B a substance or a component of a substance used or manufactured at your facility as an intermediate or final product or byproduct? ☑ Yes ☐ No ➔ SKIP to Section 9.
8.2	List the pollutants below. 1. Arsenic, total 4. Copper, total 7. Nickel, total 2. Cadmium, total 5. Lead, total 8. Zinc, total 3. Chromium, total 6. Mercury, total 9.

SECTION 9. BIOLOGICAL TOXICITY TESTS (40 CFR 122.21(g)(11))

Biological Toxicity Tests

9.1 Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made within the last three years on (1) any of your discharges or (2) on a receiving water in relation to your discharge?

☐ Yes ☑ No ➔ SKIP to Section 10.

9.2 Identify the tests and their purposes below.

Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

SECTION 10. CONTRACT ANALYSES (40 CFR 122.21(g)(12))

Contract Analyses

10.1 Were any of the analyses reported in Section 7 performed by a contract laboratory or consulting firm?

☑ Yes ☐ No ➔ SKIP to Section 11.

10.2 Provide information for each contract laboratory or consulting firm below.

	Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
Name of laboratory/firm	Pace Analytical Services, LLC		
Laboratory address	1168 Whigham Place Tuscaloosa, AL 35405		
Phone number	(205) 614-6630		
Pollutant(s) analyzed	See Table A,B,C,D		

SECTION 11. ADDITIONAL INFORMATION (40 CFR 122.21(g)(13))

Additional Information

11.1 Has the NPDES permitting authority requested additional information?

☐ Yes ☑ No ➔ SKIP to Section 12.

11.2 List the information requested and attach it to this application.

1.	4.
2.	5.
3.	6.

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110010108141		West Fraser EWP - Huguley	

SECTION 12. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement

12.1 In Column 1 below, mark the sections of Form 2C that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.

Column 1	Column 2	
☑ Section 1: Outfall Location	☐ w/ attachments	
☑ Section 2: Line Drawing	☑ w/ line drawing	☐ w/ additional attachments
☑ Section 3: Average Flows and Treatment	☐ w/ attachments	☐ w/ list of each user of privately owned treatment works
☑ Section 4: Intermittent Flows	☐ w/ attachments	
☑ Section 5: Production	☐ w/ attachments	
☑ Section 6: Improvements	☐ w/ attachments	☐ w/ optional additional sheets describing any additional pollution control plans
☑ Section 7: Effluent and Intake Characteristics	☐ w/ request for a waiver and supporting information ☐ w/ small business exemption request ☑ w/ Table A ☑ w/ Table C ☑ w/ Table E	☐ w/ explanation for identical outfalls ☐ w/ other attachments ☑ w/ Table B ☑ w/ Table D ☐ w/ analytical results as an attachment
☑ Section 8: Used or Manufactured Toxics	☐ w/ attachments	
☑ Section 9: Biological Toxicity Tests	☐ w/ attachments	
☑ Section 10: Contract Analyses	☐ w/ attachments	
☑ Section 11: Additional Information	☐ w/ attachments	
☑ Section 12: Checklist and Certification Statement	☐ w/ attachments	

12.2 **Certification Statement**

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

Name (print or type first and last name)	Official title
Phillip Starrett, Jr	General Manager
Signature	**Date signed**
Phillip Starrett Digitally signed by Phillip Starrett Jr. DN: CN=Phillip Starrett Jr., E=phillip.starrettjr@westfraser.com Reason: I am the author of this document Location: Date: 2024.12.02 13:35:02-05'00' Foxit PDF Editor Version: 2024.3.0	

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110010108141		West Fraser EWP - Huguley	

Form Approved 03/05/19
OMB No. 2040-0004

TABLE A. CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(iii))[1]

	Pollutant	Waiver Requested (if applicable)	Units (specify)		Effluent				Intake (Optional)	
					Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you have applied to your NPDES permitting authority for a waiver for *all* of the pollutants listed on this table for the noted outfall.									
1.	Biochemical oxygen demand (BOD_5)	☐	Concentration	mg/L	77.7	----	----	1	----	----
			Mass	----	----	----	----	----	----	----
2.	Chemical oxygen demand (COD)	☐	Concentration	mg/L	286	----	----	1	----	----
			Mass	----	----	----	----	----	----	----
3.	Total organic carbon (TOC)	☐	Concentration	mg/L	61.0	----	----	----	----	----
			Mass	----	----	----	----	----	----	----
4.	Total suspended solids (TSS)	☐	Concentration	mg/L	120	----	52.44	9	----	----
			Mass	----	----	----	----	----	----	----
5.	Ammonia (as N)	☐	Concentration	mg/L	ND	----	----	1	----	----
			Mass	----	----	----	----	----	----	----
6.	Flow	☐	Rate	MGD	4.3	----	0.2	Estimate	----	----
7.	Temperature (winter)	☐	°C	°C	Ambient	Ambient	Ambient	Estimate	----	----
	Temperature (summer)	☐	°C	°C	Ambient	Ambient	Ambient	Estimate	----	----
8.	pH (minimum)	☐	Standard units	s.u.	5.21	----	----	----	----	----
	pH (maximum)	☐	Standard units	s.u.	7.48	----	----	----	----	----

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

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110010108141		West Fraser EWP - Huguley	

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you qualify as a small business per the instructions to Form 2C and, therefore, do not need to submit quantitative data for any of the organic toxic pollutants in Sections 2 through 5 of this table. Note, however, that you must still indicate in the appropriate column of this table if you believe any of the pollutants listed are present in your discharge.											
Section 1. Toxic Metals, Cyanide, and Total Phenols												
1.1	Antimony, total (7440-36-0)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
1.2	Arsenic, total (7440-38-2)	☑	☑	☐	Concentration	ug/L	ND	----	----	1	----	----
					Mass	----	----	----	----	----	----	----
1.3	Beryllium, total (7440-41-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
1.4	Cadmium, total (7440-43-9)	☑	☑	☐	Concentration	ug/L	ND	----	----	1	----	----
					Mass	----	----	----	----	----	----	----
1.5	Chromium, total (7440-47-3)	☑	☑	☐	Concentration	ug/L	1.8	----	----	1	----	----
					Mass	----	----	----	----	----	----	----
1.6	Copper, total (7440-50-8)	☑	☑	☐	Concentration	ug/L	4.4	----	----	1	----	----
					Mass	----	----	----	----	----	----	----
1.7	Lead, total (7439-92-1)	☑	☑	☐	Concentration	ug/L	1.8	----	----	1	----	----
					Mass	----	----	----	----	----	----	----
1.8	Mercury, total (7439-97-6)	☑	☑	☐	Concentration	ug/L	ND	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
1.9	Nickel, total (7440-02-0)	☑	☑	☐	Concentration	ug/L	1.6	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
1.10	Selenium, total (7782-49-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
1.11	Silver, total (7440-22-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
1.12	Thallium, total (7440-28-0)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
1.13	Zinc, total (7440-66-6)	☑	☑	☐	Concentration	ug/L	27.2	----	----	1	----	----
					Mass	----	----	----	----	----	----	----
1.14	Cyanide, total (57-12-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
1.15	Phenols, total	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
Section 2. Organic Toxic Pollutants (GC/MS Fraction—Volatile Compounds)												
2.1	Acrolein (107-02-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.2	Acrylonitrile (107-13-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.3	Benzene (71-43-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.4	Bromoform (75-25-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.5	Carbon tetrachloride (56-23-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.6	Chlorobenzene (108-90-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.7	Chlorodibromomethane (124-48-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.8	Chloroethane (75-00-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	

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	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.9	2-chloroethylvinyl ether (110-75-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.10	Chloroform (67-66-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.11	Dichlorobromomethane (75-27-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.12	1,1-dichloroethane (75-34-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.13	1,2-dichloroethane (107-06-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.14	1,1-dichloroethylene (75-35-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.15	1,2-dichloropropane (78-87-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.16	1,3-dichloropropylene (542-75-6)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.17	Ethylbenzene (100-41-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.18	Methyl bromide (74-83-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.19	Methyl chloride (74-87-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.20	Methylene chloride (75-09-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.21	1,1,2,2- tetrachloroethane (79-34-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
2.22	Tetrachloroethylene (127-18-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.23	Toluene (108-88-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.24	1,2-trans-dichloroethylene (156-60-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.25	1,1,1-trichloroethane (71-55-6)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.26	1,1,2-trichloroethane (79-00-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.27	Trichloroethylene (79-01-6)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
2.28	Vinyl chloride (75-01-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
Section 3. Organic Toxic Pollutants (GC/MS Fraction—Acid Compounds)												
3.1	2-chlorophenol (95-57-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.2	2,4-dichlorophenol (120-83-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.3	2,4-dimethylphenol (105-67-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.4	4,6-dinitro-o-cresol (534-52-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.5	2,4-dinitrophenol (51-28-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
3.6	2-nitrophenol (88-75-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.7	4-nitrophenol (100-02-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.8	p-chloro-m-cresol (59-50-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.9	Pentachlorophenol (87-86-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.10	Phenol (108-95-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
3.11	2,4,6-trichlorophenol (88-05-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
Section 4. Organic Toxic Pollutants (GC/MS Fraction—Base /Neutral Compounds)												
4.1	Acenaphthene (83-32-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.2	Acenaphthylene (208-96-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.3	Anthracene (120-12-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.4	Benzidine (92-87-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.5	Benzo (a) anthracene (56-55-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.6	Benzo (a) pyrene (50-32-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.7	3,4-benzofluoranthene (205-99-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.8	Benzo (ghi) perylene (191-24-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.9	Benzo (k) fluoranthene (207-08-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.10	Bis (2-chloroethoxy) methane (111-91-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.11	Bis (2-chloroethyl) ether (111-44-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.12	Bis (2-chloroisopropyl) ether (102-80-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.13	Bis (2-ethylhexyl) phthalate (117-81-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.14	4-bromophenyl phenyl ether (101-55-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.15	Butyl benzyl phthalate (85-68-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.16	2-chloronaphthalene (91-58-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.17	4-chlorophenyl phenyl ether (7005-72-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.18	Chrysene (218-01-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.19	Dibenzo (a,h) anthracene (53-70-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.20	1,2-dichlorobenzene (95-50-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.21	1,3-dichlorobenzene (541-73-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.22	1,4-dichlorobenzene (106-46-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.23	3,3-dichlorobenzidine (91-94-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.24	Diethyl phthalate (84-66-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.25	Dimethyl phthalate (131-11-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.26	Di-n-butyl phthalate (84-74-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.27	2,4-dinitrotoluene (121-14-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.28	2,6-dinitrotoluene (606-20-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.29	Di-n-octyl phthalate (117-84-0)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.30	1,2-Diphenylhydrazine (as azobenzene) (122-66-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.31	Fluoranthene (206-44-0)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.32	Fluorene (86-73-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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4.33	Hexachlorobenzene (118-74-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.34	Hexachlorobutadiene (87-68-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.35	Hexachlorocyclopentadiene (77-47-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.36	Hexachloroethane (67-72-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.37	Indeno (1,2,3-cd) pyrene (193-39-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.38	Isophorone (78-59-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.39	Naphthalene (91-20-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.40	Nitrobenzene (98-95-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.41	N-nitrosodimethylamine (62-75-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.42	N-nitrosodi-n-propylamine (621-64-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.43	N-nitrosodiphenylamine (86-30-6)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.44	Phenanthrene (85-01-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
4.45	Pyrene (129-00-0)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
4.46	1,2,4-trichlorobenzene (120-82-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
Section 5. Organic Toxic Pollutants (GC/MS Fraction—Pesticides)												
5.1	Aldrin (309-00-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.2	α-BHC (319-84-6)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.3	β-BHC (319-85-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.4	γ-BHC (58-89-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.5	δ-BHC (319-86-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.6	Chlordane (57-74-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.7	4,4'-DDT (50-29-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.8	4,4'-DDE (72-55-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.9	4,4'-DDD (72-54-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.10	Dieldrin (60-57-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.11	α-endosulfan (115-29-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110010108141		West Fraser EWP - Huguley	

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.12	β-endosulfan (115-29-7)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.13	Endosulfan sulfate (1031-07-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.14	Endrin (72-20-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.15	Endrin aldehyde (7421-93-4)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.16	Heptachlor (76-44-8)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.17	Heptachlor epoxide (1024-57-3)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.18	PCB-1242 (53469-21-9)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.19	PCB-1254 (11097-69-1)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.20	PCB-1221 (11104-28-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.21	PCB-1232 (11141-16-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.22	PCB-1248 (12672-29-6)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.23	PCB-1260 (11096-82-5)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----
5.24	PCB-1016 (12674-11-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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TABLE B. TOXIC METALS, CYANIDE, TOTAL PHENOLS, AND ORGANIC TOXIC POLLUTANTS (40 CFR 122.21(g)(7)(v))[1]

	Pollutant/Parameter (and CAS Number, if available)	Testing Required	Presence or Absence (check one)		Units (specify)		Effluent				Intake (optional)	
			Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
5.25	Toxaphene (8001-35-2)	☐	☐	☑	Concentration	----	----	----	----	----	----	----
					Mass	----	----	----	----	----	----	----

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

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
☐	Check here if you believe all pollutants on Table C to be ***present*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
☐	Check here if you believe all pollutants on Table C to be ***absent*** in your discharge from the noted outfall. You need *not* complete the "Presence or Absence" column of Table C for *each* pollutant.										
1.	Bromide (24959-67-9)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
2.	Chlorine, total residual	☑	☐	Concentration	mg/L	ND	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
3.	Color	☑	☐	Concentration	units	100	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
4.	Fecal coliform	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
5.	Fluoride (16984-48-8)	☑	☐	Concentration	mg/L	1.2	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
6	Nitrate-nitrite	☑	☐	Concentration	mg/L	ND	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
7.	Nitrogen, total organic (as N)	☑	☐	Concentration	mg/L	ND	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
8.	Oil and grease	☑	☐	Concentration	mg/L	64	----	11.49	9	----	----
				Mass	----	----	----	----	----	----	----
9.	Phosphorus (as P), total (7723-14-0)	☑	☐	Concentration	mg/L	0.99	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
10.	Sulfate (as SO_4) (14808-79-8)	☑	☐	Concentration	mg/L	28.7	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
11.	Sulfide (as S)	☑	☐	Concentration	mg/L	0.042	----	----	1	----	----
				Mass	----	----	----	----	----	----	----

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
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TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
12.	Sulfite (as SO_3) (14265-45-3)	☑	☐	Concentration	mg/L	ND	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
13.	Surfactants	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
14.	Aluminum, total (7429-90-5)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
15.	Barium, total (7440-39-3)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
16.	Boron, total (7440-42-8)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
17.	Cobalt, total (7440-48-4)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
18.	Iron, total (7439-89-6)	☑	☐	Concentration	ug/L	2150	----	----	1	----	----
				Mass	----	----	----	----	----	----	----
19.	Magnesium, total (7439-95-4)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
20.	Molybdenum, total (7439-98-7)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
21.	Manganese, total (7439-96-5)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
22.	Tin, total (7440-31-5)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
23.	Titanium, total (7440-32-6)	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----

TABLE C. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(vi))[1]

	Pollutant	Presence or Absence (check one)		Units (specify)		Effluent				Intake (Optional)	
		Believed Present	Believed Absent			Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
24.	**Radioactivity**										
	Alpha, total	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
	Beta, total	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
	Radium, total	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----
	Radium 226, total	☐	☑	Concentration	----	----	----	----	----	----	----
				Mass	----	----	----	----	----	----	----

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

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TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
1.	Asbestos	☐	☑		
2.	Acetaldehyde	☐	☑		
3.	Allyl alcohol	☐	☑		
4.	Allyl chloride	☐	☑		
5.	Amyl acetate	☐	☑		
6.	Aniline	☐	☑		
7.	Benzonitrile	☐	☑		
8.	Benzyl chloride	☐	☑		
9.	Butyl acetate	☐	☑		
10.	Butylamine	☐	☑		
11.	Captan	☐	☑		
12.	Carbaryl	☐	☑		
13.	Carbofuran	☐	☑		
14.	Carbon disulfide	☐	☑		
15.	Chlorpyrifos	☐	☑		
16.	Coumaphos	☐	☑		
17.	Cresol	☐	☑		
18.	Crotonaldehyde	☐	☑		
19.	Cyclohexane	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
20.	2,4-D (2,4-dichlorophenoxyacetic acid)	☐	☑		
21.	Diazinon	☐	☑		
22.	Dicamba	☐	☑		
23.	Dichlobenil	☐	☑		
24.	Dichlone	☐	☑		
25.	2,2-dichloropropionic acid	☐	☑		
26.	Dichlorvos	☐	☑		
27.	Diethyl amine	☐	☑		
28.	Dimethyl amine	☐	☑		
29.	Dintrobenzene	☐	☑		
30.	Diquat	☐	☑		
31.	Disulfoton	☐	☑		
32.	Diuron	☐	☑		
33.	Epichlorohydrin	☐	☑		
34.	Ethion	☐	☑		
35.	Ethylene diamine	☐	☑		
36.	Ethylene dibromide	☐	☑		
37.	Formaldehyde	☐	☑		
38.	Furfural	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
39.	Guthion	☐	☑		
40.	Isoprene	☐	☑		
41.	Isopropanolamine	☐	☑		
42.	Kelthane	☐	☑		
43.	Kepone	☐	☑		
44.	Malathion	☐	☑		
45.	Mercaptodimethur	☐	☑		
46.	Methoxychlor	☐	☑		
47.	Methyl mercaptan	☐	☑		
48.	Methyl methacrylate	☐	☑		
49.	Methyl parathion	☐	☑		
50.	Mevinphos	☐	☑		
51.	Mexacarbate	☐	☑		
52.	Monoethyl amine	☐	☑		
53.	Monomethyl amine	☐	☑		
54.	Naled	☐	☑		
55.	Naphthenic acid	☐	☑		
56.	Nitrotoluene	☐	☑		
57.	Parathion	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
58.	Phenolsulfonate	☐	☑		
59.	Phosgene	☐	☑		
60.	Propargite	☐	☑		
61.	Propylene oxide	☐	☑		
62.	Pyrethrins	☐	☑		
63.	Quinoline	☐	☑		
64.	Resorcinol	☐	☑		
65.	Strontium	☐	☑		
66.	Strychnine	☐	☑		
67.	Styrene	☐	☑		
68.	2,4,5-T (2,4,5-trichlorophenoxyacetic acid)	☐	☑		
69.	TDE (tetrachlorodiphenyl ethane)	☐	☑		
70.	2,4,5-TP [2-(2,4,5-trichlorophenoxy) propanoic acid]	☐	☑		
71.	Trichlorofon	☐	☑		
72.	Triethanolamine	☐	☑		
73.	Triethylamine	☐	☑		
74.	Trimethylamine	☐	☑		
75.	Uranium	☐	☑		
76.	Vanadium	☐	☑		

TABLE D. CERTAIN HAZARDOUS SUBSTANCES AND ASBESTOS (40 CFR 122.21(g)(7)(vii))[1]

	Pollutant	Presence or Absence (check one)		Reason Pollutant Believed Present in Discharge	Available Quantitative Data (specify units)
		Believed Present	Believed Absent		
77.	Vinyl acetate	☐	☑		
78.	Xylene	☐	☑		
79.	Xylenol	☐	☑		
80.	Zirconium	☐	☑		

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

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TABLE E. 2,3,7,8 TETRACHLORODIBENZO P DIOXIN (2,3,7,8 TCDD) (40 CFR 122.21(g)(7)(viii))

Pollutant	TCDD Congeners Used or Manufactured	Presence or Absence (check one)		Results of Screening Procedure
		Believed Present	Believed Absent	
2,3,7,8-TCDD	☑	☑	☐	The isotopically-labeled TCDD internal standard in the sample extract was recovered at 52%. All of the labeled standard recoveries obtained for this project were within the target ranges specified in Method 1613B. Also, since the quantification of the native TCDD was based on isotope dilution, the data were automatically corrected for

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Form 2F NPDES

EPA

U.S Environmental Protection Agency
Application for NPDES Permit to Discharge Wastewater

STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY

SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1))

Outfall Location

1.1 Provide information on each of the facility's outfalls in the table below

Outfall Number	Receiving Water Name	Latitude	Longitude
001	Little Osanippa Creek	32° 49′ 0.001″ N	-85° 13′ 29.99″ W
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″
		° ′ ″	° ′ ″

SECTION 2. IMPROVEMENTS (40 CFR 122.21(g)(6))

Improvements

2.1 Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?

☐ Yes ☑ No ➔ SKIP to Section 3.

2.2 Briefly identify each applicable project in the table below.

Brief Identification and Description of Project	Affected Outfalls (list outfall numbers)	Source(s) of Discharge	Final Compliance Dates	
			Required	Projected

2.3 Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? (Optional Item)

☐ Yes ☑ No

SECTION 3. SITE DRAINAGE MAP (40 CFR 122.26(c)(1)(i)(A))

Site Drainage Map

3.1 Have you attached a site drainage map containing all required information to this application? (See instructions for specific guidance.)

☑ Yes ☐ No

SECTION 4. POLLUTANT SOURCES (40 CFR 122.26(c)(1)(i)(B))

Pollutant Sources

4.1 Provide information on the facility's pollutant sources in the table below.

Outfall Number	Impervious Surface Area (within a mile radius of the facility)		Total Surface Area Drained (within a mile radius of the facility)	
001	14.47	*specify units* Acres	28.18	*specify units* Acres
		specify units		*specify units*
		specify units		*specify units*
		specify units		*specify units*
		specify units		*specify units*
		specify units		*specify units*

4.2 Provide a narrative description of the facility's significant material in the space below. (See instructions for content requirements.)

Significant materials associated with Outfall 001 include those commonly present in the production of oriented strand board (OSB). The facility operations include those associated with green wood handling/processing, green wood drying, dry strand blending, mat forming and pressing, and board finishing. Wood ash is created in the process of firing a boiler and pre-heating rotary kiln with wood material. The ash is cooled prior to deposition with water. With this permit, the facility will be discharging boiler blowdown, small amounts of ash cooling water and pad washdown water, both of which are commingled with industrial-impacted stormwater.

4.3 Provide the location and a description of existing structural and non-structural control measures to reduce pollutants in stormwater runoff. (See instructions for specific guidance.)

Stormwater Treatment		
Outfall Number	Control Measures and Treatment	Codes from Exhibit 2F–1 (list)
001	On-site detention pond sedimentation	1-U
001	Discharge to surface water	4-A
001	Screening	1-T

SECTION 5. NON STORMWATER DISCHARGES (40 CFR 122.26(c)(1)(i)(C))

Non-Stormwater Discharges

5.1 *I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of non-stormwater discharges. Moreover, I certify that the outfalls identified as having non-stormwater discharges are described in either an accompanying NPDES Form 2C, 2D, or 2E application.*

Name (print or type first and last name)	Official title
Scott Pearson	Regional Manager
Signature	**Date signed**

5.2 Provide the testing information requested in the table below.

Outfall Number	Description of Testing Method Used	Date(s) of Testing	Onsite Drainage Points Directly Observed During Test
001	Visual Inspection	08/22/2024	Fire-fighting water
001	Visual Inspection	8/22/2024	Fire hydrant flushings
001	Visual Inspection	8/22/2024	AC condensate
001	Engineering Report/Analytical Data	9/5/2024	Ash Screw Cooling Water
001	Engineering Report/Analytical Data	9/5/2024	Pavement Washwaters
001	Engineering Report/Analytical Data	9/5/2024	Boiler Blowdown and Wat

SECTION 6. SIGNIFICANT LEAKS OR SPILLS (40 CFR 122.26(c)(1)(i)(D))

Significant Leaks or Spills

6.1 Describe any significant leaks or spills of toxic or hazardous pollutants in the last three years.

7/12/2023 – 80 gallons – diesel
11/8/2023 – 50 gallons – lube oil

SECTION 7. DISCHARGE INFORMATION (40 CFR 122.26(c)(1)(i)(E))

Discharge Information

See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.

7.1 Is this a new source or new discharge?

☑ Yes → See instructions regarding submission of *estimated* data. ☐ No → See instructions regarding submission of *actual* data.

Tables A, B, C, and D

7.2 Have you completed Table A for each outfall?

☐ Yes ☑ No

Discharge Information Continued

7.3	Is the facility subject to an effluent limitation guideline (ELG) or effluent limitations in an NPDES permit for its process wastewater? ☐ Yes ☑ No ➔ SKIP to Item 7.5.
7.4	Have you completed Table B by providing quantitative data for those pollutants that are (1) limited either directly or indirectly in an ELG and/or (2) subject to effluent limitations in an NPDES permit for the facility's process wastewater? ☐ Yes ☑ No
7.5	Do you know or have reason to believe any pollutants in Exhibit 2F–2 are present in the discharge? ☑ Yes ☐ No ➔ SKIP to Item 7.7.
7.6	Have you listed all pollutants in Exhibit 2F–2 that you know or have reason to believe are present in the discharge and provided quantitative data or an explanation for those pollutants in Table C? ☐ Yes ☑ No
7.7	Do you qualify for a small business exemption under the criteria specified in the Instructions? ☐ Yes ➔ SKIP to Item 7.18. ☑ No
7.8	Do you know or have reason to believe any pollutants in Exhibit 2F–3 are present in the discharge? ☑ Yes ☐ No ➔ SKIP to Item 7.10.
7.9	Have you listed all pollutants in Exhibit 2F–3 that you know or have reason to believe are present in the discharge in Table C? ☑ Yes ☐ No
7.10	Do you expect any of the pollutants in Exhibit 2F–3 to be discharged in concentrations of 10 ppb or greater? ☐ Yes ☑ No ➔ SKIP to Item 7.12.
7.11	Have you provided quantitative data in Table C for those pollutants in Exhibit 2F–3 that you expect to be discharged in concentrations of 10 ppb or greater? ☐ Yes ☑ No
7.12	Do you expect acrolein, acrylonitrile, 2,4-dinitrophenol, or 2-methyl-4,6-dinitrophenol to be discharged in concentrations of 100 ppb or greater? ☐ Yes ☑ No ➔ SKIP to Item 7.14.
7.13	Have you provided quantitative data in Table C for the pollutants identified in Item 7.12 that you expect to be discharged in concentrations of 100 ppb or greater? ☐ Yes ☑ No
7.14	Have you provided quantitative data or an explanation in Table C for pollutants you expect to be present in the discharge at concentrations less than 10 ppb (or less than 100 ppb for the pollutants identified in Item 7.12)? ☐ Yes ☑ No
7.15	Do you know or have reason to believe any pollutants in Exhibit 2F–4 are present in the discharge? ☐ Yes ☑ No ➔ SKIP to Item 7.17.
7.16	Have you listed pollutants in Exhibit 2F–4 that you know or believe to be present in the discharge and provided an explanation in Table C? ☐ Yes ☑ No
7.17	Have you provided information for the storm event(s) sampled in Table D? ☐ Yes ☑ No

Discharge Information Continued

Used or Manufactured Toxics

7.18 Is any pollutant listed on Exhibits 2F–2 through 2F–4 a substance or a component of a substance used or manufactured as an intermediate or final product or byproduct?

☐ Yes ☑ No ➔ SKIP to Section 8.

7.19 List the pollutants below, including TCDD if applicable.

1. NA	4.	7.
2.	5.	8.
3.	6.	9.

SECTION 8. BIOLOGICAL TOXICITY TESTING DATA (40 CFR 122.21(g)(11))

Biological Toxicity Testing Data

8.1 Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last three years?

☐ Yes ☑ No ➔ SKIP to Section 9.

8.2 Identify the tests and their purposes below.

Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?	Date Submitted
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

SECTION 9. CONTRACT ANALYSIS INFORMATION (40 CFR 122.21(g)(12))

Contract Analysis Information

9.1 Were any of the analyses reported in Section 7 (on Tables A through C) performed by a contract laboratory or consulting firm?

☑ Yes ☐ No ➔ SKIP to Section 10.

9.2 Provide information for each contract laboratory or consulting firm below.

	Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
Name of laboratory/firm	Pace Analytical Services, LLC	Sutherland Env Company	Guardian Systems, Inc
Laboratory address	1168 Whigham Place Tuscaloosa, AL 34505	2515 5th Avenue South Birmingham, AL 34233	1108 Ashville Rd Leeds, AL 35094
Phone number	(205) 614-6630	(205) 581-9500	(205) 699-6647
Pollutant(s) analyzed	All Form 2F and 2C required analysis. Tables A,B,C, and D.	Historic data for Table A	Historic data for Table A

EPA Identification Number	NPDES Permit Number	Facility Name	Form Approved 03/05/19 OMB No. 2040-0004
110010108141	N/A	West Fraser EWP - Huguley	

SECTION 10. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

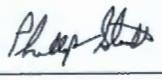
Checklist and Certification Statement

10.1 In Column 1 below, mark the sections of Form 2F that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.

Column 1	Column 2
☑ Section 1	☐ w/ attachments (e.g., responses for additional outfalls)
☑ Section 2	☐ w/ attachments
☑ Section 3	☑ w/ site drainage map
☑ Section 4	☐ w/ attachments
☑ Section 5	☐ w/ attachments
☑ Section 6	☐ w/ attachments
☑ Section 7	☑ Table A ☐ w/ small business exemption request ☐ Table B ☐ w/ analytical results as an attachment ☐ Table C ☐ Table D
☑ Section 8	☐ w/attachments
☑ Section 9	☐ w/attachments (e.g., responses for additional contact laboratories or firms)
☑ Section 10	☐

10.2 **Certification Statement**

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

Name (print or type first and last name)	Official title
Phillip Starrett, Jr	General Manager
Signature  Digitally signed by Phillip Starrett Jr. DN: CN=Phillip Starrett Jr., E=phillip.starrettjr@westfraser.com Reason: I am the author of this document Location: Date: 2024.12.02 13:36:40-05'00' Foxit PDF Editor Version: 2024.3.0	Date signed

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110010108141	N/A	West Fraser EWP - Huguley	001

Form Approved 03/05/19
OMB No. 2040-0004

TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETERS (40 CFR 122.26(c)(1)(i)(E)(3))[1]

You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details and requirements.

	Pollutant or Parameter	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
1.	Oil and grease	64 mg/L		11.49mg/L		9	1
2.	Biochemical oxygen demand (BOD_5)	77 mg/L	-----	77/ mg/L	-----	1	1
3.	Chemical oxygen demand (COD)	286 mg/L	-----	286 mg/L	-----	1	1
4.	Total suspended solids (TSS)	120 mg/L	-----	52.44 mg/L	-----	9	1
5.	Total phosphorus	0.99 mg/L	-----	0.99 mg/L	-----	1	1
6.	Total Kjeldahl nitrogen (TKN)	ND	-----	ND	-----	1	1
7.	Total nitrogen (as N)	1	-----	1	-----	1	1
8.	pH (minimum)	5.21		----		9	1
	pH (maximum)	7.48		----		9	1

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

*Required monitoring will be completed within 24 months of permit receipt.

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110010108141	N/A	West Fraser EWP - Huguley	001

Form Approved 03/05/19
OMB No. 2040-0004

TABLE B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.26(c)(1)(i)(E)(4) and 40 CFR 122.21(g)(7)(vi)(A))[1]

List each pollutant that is limited in an effluent limitation guideline (ELG) that the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
Not applicable						

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

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
110010108141	N/A	West Fraser EWP - Huguley	001

Form Approved 03/05/19
OMB No. 2040-0004

TABLE C. TOXIC POLLUTANTS, CERTAIN HAZARDOUS SUBSTANCES, AND ASBESTOS (40 CFR 122.26(c)(1)(i)(E)(4) and 40 CFR 122.21(g)(7)(vi)(B) and (vii))[1]

List each pollutant shown in Exhibits 2F–2, 2F–3, and 2F–4 that you know or have reason to believe is present. Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
Arsenic	ND ug/L	----	ND ug/L	----	1	1
Cadmium	ND ug/L	----	ND ug/L	----	1	1
Chromium	1.8 ug/L	----	1.8 ug/L	----	1	1
Copper	4.4 ug/L	----	4.4 ug/L	----	1	1
Iron	2150 ug/L	----	2150 ug/L	----	1	1
Zinc	27.2 ug/L	----	27.2 ug/L	----	1	1
Mercury	ND ug/L	----	ND ug/L	----	1	1
Color	100 units	----	100 units	----	1	1
Total Residual Chlorine	ND mg/L	----	ND mg/L	----	1	1
Total Sulfide	0.042 mg/L	----	0.042 mg/L	----	1	1
Sulfite	ND mg/L	----	ND mg/L	----	1	1
Flouride	1.2 mg/L	----	1.2 mg/L	----	1	1
Ammonia	ND mg/L	----	ND mg/L	----	1	1
Total Organic Carbon	61.0 mg/L	----	61.0 mg/L	----	1	1
Sulfate	28.7 mg/L	----	28.7 mg/L	----	1	1

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

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EPA Identification Number	NPDES Permit Number	Facility name	Outfall Number
110010108141	N/A	West Fraser EWP - Huguley	001

Form Approved 03/05/19
OMB No. 2040-0004

TABLE D. STORM EVENT INFORMATION (40 CFR 122.26(c)(1)(i)(E)(6))

Provide data for the storm event(s) that resulted in the maximum daily discharges for the flow-weighted composite sample.

Date of Storm Event	Duration of Storm Event (in hours)	Total Rainfall During Storm Event (in inches)	Number of Hours Between Beginning of Storm Measured and End of Previous Measurable Rain Event	Maximum Flow Rate During Rain Event (in gpm or specify units)	Total Flow from Rain Event (in gallons or specify units)
08/22/2024	2	0.7	>72	208 GPM	O.3 million gallons

Provide a description of the method of flow measurement or estimate.

Utilized a run-off co-efficient calculation of drainage basin area and average and maximum rain fall events.

West Fraser

4400 Barton Industrial Blvd
Lanett, AL 36863
Phone: (334) 576-1500
www.westfraser.com

December 21, 2023

Ms. Victoria Kim
ADEM – Water Division
Industrial/Municipal Branch
PO Box 901463
Montgomery, AL 36130-1463

RE: Multi-Sector General Permit Number ALG060373 - Individual Permit Application

Ms. Kim:

West Fraser acquired Norbord, Inc in 2021 and in May of 2023 completed a voluntary environmental compliance audit at the Huguley oriented-strand board ("OSB") Facility ("Facility"). A letter of voluntary self-disclosure of the potential compliance issues was submitted by Steve Weber of Parker Poe to Marilyn Elliot, Alabama Department of Environmental Management ("ADEM") Deputy Director on behalf of West Fraser on June 28, 2023. The attached *NPDES Individual Permit Application (Form 187) - Initial Issuance for Industrial Facilities* was developed to address Item 6 of the submitted disclosure letter.

> ***Item 6. Potential Stormwater Permitting Deficiencies and Needed Updates.***
> *The audit team identified potential discharges of stormwater streams that are not authorized under the Alabama General Permit NPDES Permit No. ALG060000 or otherwise permitted. The audit team also identified potential deficiencies with outfalls identified in the Huguley Facility's Notice of Intent ("NOI").*

The Facility also is submitting, under separate cover, a *State Indirect Discharge (SID) Permit Application (Form 186) - Initial Issuance* to address the other identified stormwater discharges. Upon issuance of these permits, the Facility will submit a request to modify the existing coverage under the Alabama General Permit NPDES Permit No. ALG060373 through the *NPDES General Permit - Lumber, Wood and Paper Board (ALG060000) - Mod/Reissue - (Form 396)* to reflect the changes.

Additionally, due to an internal reorganization, a notification was submitted to ADEM on December 18, 2023, that the new legal entity and the new permittee will become West Fraser US EWP LLC as of January 1, 2024. The legal entity that currently holds the Facility's coverage under the NPDES General Permit is Norbord Alabama, Inc., an Alabama corporation ("Existing Permittee"). The Existing Permittee's parent company is Norbord Panels USA Inc., a Delaware corporation ("Norbord Panels"). Norbord Panels' U.S. parent company is West Fraser (USA), Inc. ("West Fraser USA"). West Fraser USA is undergoing an internal reorganization in which Existing Permittee will merge with and into a new legal entity called West Fraser

4400 Barton Industrial Blvd
Lanett, AL 36863
Phone: (334) 576-1500
www.westfraser.com

US EWP LLC, a Delaware limited liability company, with West Fraser US EWP LLC as the surviving entity. However, West Fraser US EWP LLC's ultimate U.S. parent company will remain West Fraser USA.

We look forward to working with ADEM to resolve this matter and ensure compliance that is acceptable to ADEM. If you have any further questions, please feel free to reach out to me at the contact information below or to the Facility Environmental Technician Jonathan Foster at Jonathan.Foster@westfraser.com or (334) 576-1500.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Sincerely,

Phillip Starrett, Jr.
General Manager
Phillip.StarrettJr@westfraser.com
(803) 271-5166

Alabama NPDES Application Supplemental Information

West Fraser US EWP, LLC
West Fraser EWP - Huguley

Prepared for:
Victoria Kim
Alabama Department of Environmental Management

Prepared by:
Odyssey EHS Strategies, LLC
PO Box 1892
West Monroe, Louisiana 71294

Report Date:
November 2024

ODYSSEY

ADEM Form 311 Additional Information

1. Land Application:

   Land application is not a feasible option for this wastewater because the average flow, minus stormwater, is 146,500 gallons per day. West Fraser does not have adequate acreage, not including timberlands, to land via sprinkler or fill line without discharging.

2. Pretreatment/Discharge to POTW

   The site currently does not have the infrastructure to transfer the water to the local POTW. Investment in engineering design for future pretreatment and discharge to a POTW is ongoing, but the long-term goal would be to permit the system to discharge via individual NPDES permit and a pretreatment permit to the local POTW. This would allow for operational flexibility in the case of a POTW upset or if, financially, transfer to the POTW is not attainable.

3. Relocation of Discharge

   The topography of the site prohibits the relocation of this discharge to another area of the site without the installation of collection and pumping systems. Additionally, relocation of the discharge will not prevent the need to discharge. So, this option is not viable.

4. Reuse/Recycle

   Historically, wastewater is recycled or reused at wood products facilities to combat dust on company roads. Unfortunately, the volume of wastewater generated greatly exceeds the ability to be recycled or reused as a dust suppression agent. Wastewater is also used as makeup water in wet decking operations, but the facility does not operate a wet decking system, so that option is not viable.

5. Process / Treatment Alternatives

   The OSB manufacturing process does not utilize large volumes of makeup water; therefore, the volume of water generated daily does not allow for the reintroduction of the water into the process. Additionally, the site does not have a collection system, holding system, or heating system to use to evaporate the water. At this time, no further means for process or treatment options for the wastewater is available on-site.

6. On-Site / Sub-Surface Disposal

   The site does not have an injection well or injection system. Studies have not been completed to determine if the substrate is capable of supporting an injection well, but generally, the practice of sub-surface injection is not utilized in the wood products industry. Due to costs associated with and risk involved in sub-surface disposal, this option is not viable for the site.

Please note that budgeting for the Form 313 is considered a plus/minus 50% estimate. Construction and maintenance costs can vary widely.

Attachment 1 to Supplementary Form
ADEM Form 311

Alternatives Analysis

Applicant/Project: West Fraser EWP - Huguley- Individual Permitting

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

Alternative	Viable	Non-Viable	Comment
1 Land Application		x	Limited due to volume of water generated and acreage to apply
2 Pretreatment/Discharge to POTW	x		Site in the capitalization process and conducting POTW connection feasibility study.
3 Relocation of Discharge		x	Topography limits combining or relocating discharges.
4 Reuse/Recycle		x	Volume of water generated beyond onsite reuse/recycle capability,and no external outlet has been viable.
5 Process/Treatment Alternatives		x	Water usage projects have limited water usage to a minimum at the site.
6 On-site/Sub-surface Disposal		x	Facility does not have an injection well or system, and general company policy not to inject.
(other project-specific alternatives considered by the applicant; attach additional sheets if necessary)			
7			
8			
9			

Pursuant to ADEM Administrative Code Rule 335-6-3-.04, I certify on behalf of the applicant that I have completed an evaluation of the discharge alternatives identified above, and reached the conclusions indicated.

Signature: _____ *(Professional Engineer)*

Date: 10.29.24

ALABAMA LICENSED No. 54285 PROFESSIONAL ENGINEER OLIVER S. NEAL

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

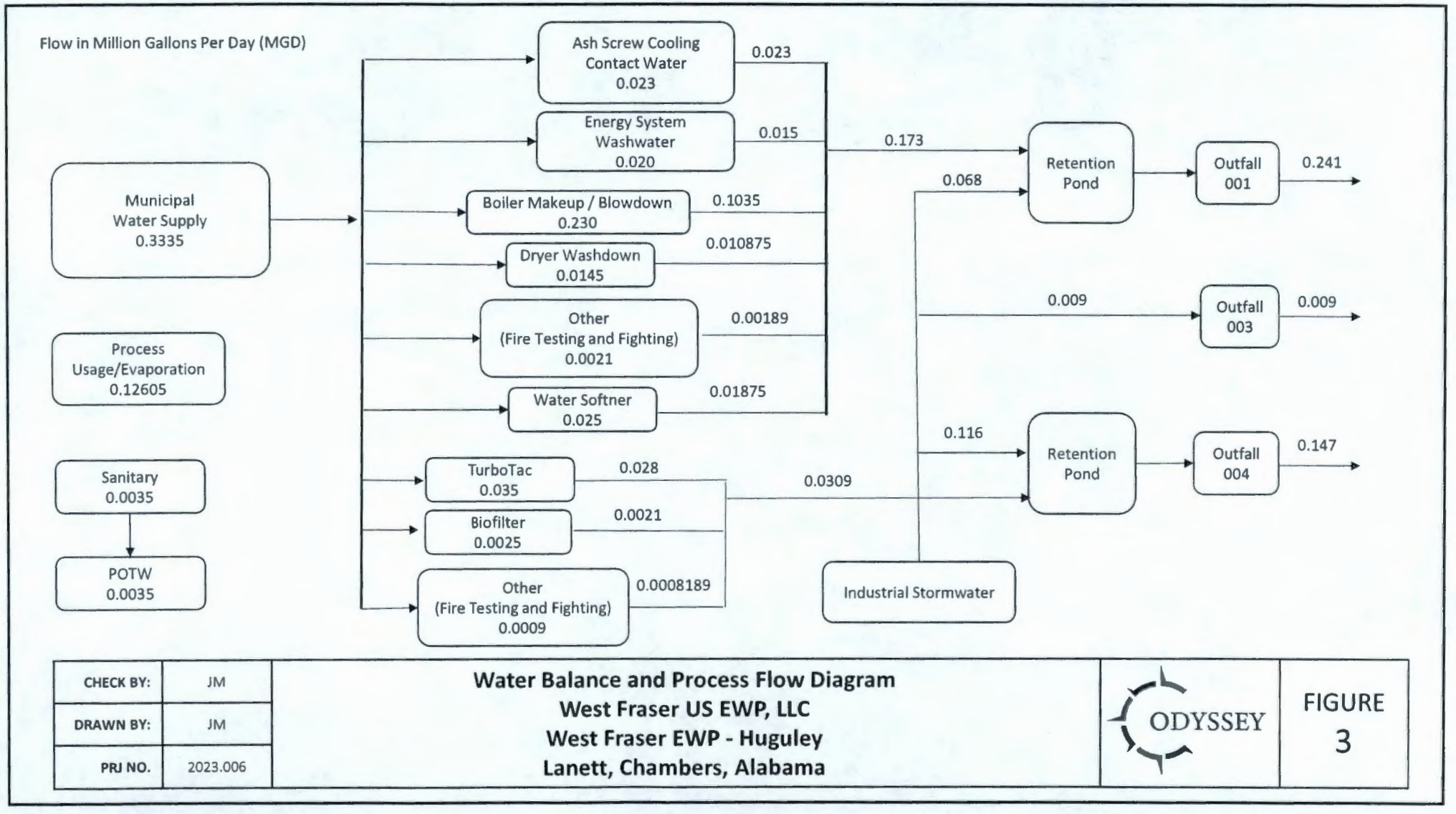
ADEM Form 311 3/02

Calculation of Total Annualized Project Costs
for Private-Sector Projects

Capital Costs to be Financed (Supplied by applicant)	$ 3.5M	(1)
Interest rate for Financing (Expressed as a decimal)	0.09	(i)
Time Period of Financing (Assume 10 years*)	10 years	(n)
Annualization Factor = $\frac{i}{(1+i)^{10} - 1} + i$	0.09	(2)
Annualized Capital Cost [Calculate: (1) x (2)]	$ 315K	(3)
Annual Cost of Operation and Maintenance (including but not limited to monitoring, inspection, permitting fees, waste disposal charges, repair, administration and replacement)**	$ 200K	(4)
Total Annual Cost of Pollution Control Project [(3) + (4)]	$ 515K	(5)

* While actual payback schedules may differ across projects and companies, assume equal annual payments over a 10-year period for consistency in comparing projects.

** For recurring costs that occur less frequently than once a year, pro rate the cost over the relevant number of years (e.g., for pumps replaced once every three years, include one-third of the cost in each year).



CHECK BY:	JM
DRAWN BY:	JM
PRJ NO.	2023.006

Water Balance and Process Flow Diagram
West Fraser US EWP, LLC
West Fraser EWP - Huguley
Lanett, Chambers, Alabama

ODYSSEY

FIGURE 3

West Fraser

Kevin Burke
Executive Vice-President, North American Operations
West Fraser Timber Co. Ltd.

To: Whom it May Concern

Date: Effective January 1, 2024

Subject: Delegation of Authority for Environmental Reporting

I, Kevin Burke, Executive Vice-President, North American Operations of West Fraser Timber Co. Ltd., (West Fraser") and as such am responsible for West Fraser's United States business operations. To the individuals holding, or whom may subsequently hold the positions named below, I hereby delegate and authorize the authority to each of them to certify, sign, and submit in the name of and on behalf of West Fraser, Inc., West Fraser Wood Products Inc. and/or West Fraser US EWP, LLC, all environmental reports, documentation, plans, correspondence or other information related to their respective business, as required by federal, state, or local permit-issuing authorities as allowed under appropriate regulations.

Mill (General) Manager or his or her designee should the Mill (General Manager) be unable to act

These authorizations shall be effective as long as I hold my present position or responsibility regarding West Fraser's U.S. business.

Sincerely,

DocuSigned by:
EA14E859C8E646B...
Kevin Burke
Executive Vice-President, North American Operations
West Fraser Timber Co. Ltd.
President, West Fraser, Inc.
President, West Fraser Wood Products Inc.
President, West Fraser US EWP LLC

Kim, Victoria P

Subject: FW: [External] [AL0084491 West Fraser]Request for Wastewater Treatment System Cost Information

From: Jonathan Foster <Jonathan.Foster@westfraser.com>
Sent: Wednesday, June 4, 2025 2:32 PM
To: Kim, Victoria P <victoria.kim@adem.alabama.gov>
Cc: Kris Waikins <Kristine.Waikins@westfraser.com>
Subject: Re: [External] [AL0084491 West Fraser]Request for Wastewater Treatment System Cost Information

Victoria,

Please see the tax information from 2024 below. We do not pay any local taxes on payroll because we are outside of a municipality. The sales/use taxes listed below combine both state and local.

Payroll Taxes:
In 2024 we paid $469,420.14 in AL state income tax that was withheld from salary and hourly employee's paychecks combined.

Sales/Use Taxes:
In 2024 we paid a total of $552,141.78 to AL in use tax.

Thank you!

Jonathan Foster | EHS Supervisor

West Fraser

4400 Barton Industrial Blvd | Lanett, AL 36863

Main Office: 334.576.1500 | Cell: 912.777.2919 |
westfraser.com

From: Kim, Victoria P <victoria.kim@adem.alabama.gov>
Sent: Thursday, May 29, 2025 4:29 PM
To: Jonathan Foster <Jonathan.Foster@westfraser.com>
Subject: RE: [External] [AL0084491 West Fraser]Request for Wastewater Treatment System Cost Information

That's fine with me!

Thank you~

Victoria Kim

Industrial Section

Industrial/Municipal Branch

Water Division

Alabama Department of Environmental Management

Work Phone: (334) 271-7895

Email: victoria.kim@adem.alabama.gov

Mailing Address:

Post Office Box 301463

Montgomery, Alabama 36130-1463

ADEM

Mission: Assure for all citizens of the state a safe, healthful and productive environment

---

From: Jonathan Foster <Jonathan.Foster@westfraser.com>
Sent: Thursday, May 29, 2025 3:26 PM
To: Kim, Victoria P <victoria.kim@adem.alabama.gov>
Subject: Re: [External] [AL0084491 West Fraser]Request for Wastewater Treatment System Cost Information

I will get you an answer ASAP on the taxes, but it may be Monday before I can get that to you. Our accountant just left and will be out of office until Monday. As for the staffing, we currently have 95 hourly and 26 salary (121 total). However, I have seen that total number at 129 employees in the past 2 years.

Thank you!

Jonathan Foster | EHS Supervisor

West Fraser

4400 Barton Industrial Blvd | Lanett, AL 36863

Main Office: 334.576.1500 | Cell: 912.777.2919 |
westfraser.com