Former RJ's Service Station
Modified Corrective Action Plan

16051 Highway 431 South
Glencoe, Calhoun County, Alabama

Facility ID No. 12811-015-003835
Incident No. UST93-08-20

POLY Project No. 8525061 (CP-70)

POLY, Inc.
117 Gemini Circle, Suite 416
Birmingham, Alabama 35209

PO Box 64
Shannon, Alabama 35142

February 27, 2026
Ms. Kayla Lewis
Alabama Department of Environmental Management
UST Corrective Action Unit
1400 Coliseum Blvd
Montgomery, Alabama 36110

RE: Modified Corrective Action Plan
Former RJ's Service Station
16051 Highway 431 South
Glencoe, Calhoun County, Alabama
Facility ID No. 12811-015-003835
Incident No. UST93-08-20
POLY Project No. 8525061 (CP-70)

Ms. Kayla Lewis:

Enclosed please find a copy of the Modified Corrective Action Plan for the above-referenced site as required by the ADEM.

If you have any questions or comments regarding this information, please feel free to contact us.

Sincerely,
Poly, Inc.

Priyanka More
Hydrogeologist
pmore@poly-inc.com

Tim Floyd, P.G.
Principal
tfloyd@poly-inc.com

Attachments
Cc: Melanie Johnson, Responsible Party

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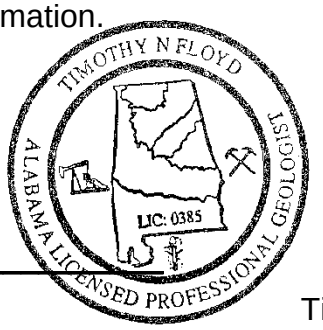
APPENDICES

CERTIFICATION PAGE

I certify under penalty of the law that this Underground Storage Tank Corrective Action Groundwater Monitoring/HVE Report for the former Abbeville Home Oil site located in Abbeville, AL and all plans, specifications, and technical data submitted within were prepared or approved under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiring of the person or persons who directly gathered the enclosed 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.



Tim Floyd, P.G.
Professional Geologist
Alabama License No. 385

February 27, 2026
Date

UST RELEASE FACT SHEET

GENERAL INFORMATION:

SITE NAME: RJ's Service Station

ADDRESS: 16051 Hwy 431 South
Glencoe, Calhoun County, Alabama

FACILITY I.D. NO.: 12811-015-003835

UST INCIDENT NO.: UST93-08-20

RESULTS OF EXPOSURE ASSESSMENT:

How many private drinking water wells are located within 1,000 ft. of site?	1
How many public water supply wells are located within 1 mile of the site?	0
Have any drinking water supply wells been impacted by contamination from this release?	No
Is there an imminent threat of contamination to any drinking water wells?	{ } Yes {X} No
Have vapors or contaminated groundwater posed a threat to the public?	{ } Yes {X} No
Are any underground utilities impacted or imminently threatened by the release?	{ } Yes {X} No
Have surface waters been impacted by the release?	{ } Yes {X} No
Is there an imminent threat of contamination to surface waters?	{ } Yes {X} No
What is the type of surrounding population?	Commercial/Residential

CONTAMINATION DESCRIPTION:

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

Free product present in wells? {} Yes {X} No Historical Maximum thickness measured: 0.90 inch (MW-14D)

Maximum PAH concentration measured in soil/groundwater: Naphthalene: 5.16 mg/L (11/13/23)

Maximum BTEX concentrations measured in soil/groundwater: gw: 93.80 mg/L MW-5 (4/16/97)

ADEM UST Form - 001 (04/22/93)

UST SITE CLASSIFICATION SYSTEM CHECKLIST

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

SITE NAME:	RJ's Service Station
SITE ADDRESS:	16051 Hwy 431 South
	Glencoe, Calhoun County, Alabama
FACILITY I.D. NO.:	12811-015-003835
UST INCIDENT NO.:	UST93-08-20
OWNER NAME:	Melanie Johnson
OWNER ADDRESS:	P. O. Box 1551, Gadsden, Alabama 35902
NAME & ADDRESS OF PERSON COMPLETING THIS FORM:	Priyanka More Poly, Inc.
	117 Gemini Circle, Ste 416
	Birmingham, Alabama 35209

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

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

ADDITIONAL COMMENTS:

Private well is not used.

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

Enter the determined classification ranking:	**C.2**

ADEM GROUNDWATER BRANCH
SITE CLASSIFICATION CHECKLIST
(5/8/95)

2.0 INTRODUCTION

This document serves as the Modified Underground Storage Tank Corrective Action Plan for RJ's Service Station in Glencoe, Calhoun County Alabama. The modification to the current Corrective Action Plan has been developed, pursuant to the Alabama Department of Environmental Management's directive, by Poly, Inc, an Alabama Tank Trust Fund (ATTF) contractor. Previous assessment has been performed at the site revealing hydrocarbon contamination from past site usage. Site Map showing the current layout of the site s included in Appendix A.

2.1 Site Location and Usage

RJ's Service Station is located at 16051 Highway 431 North, Glencoe, Calhoun County, Alabama and is situated in a commercial and residential mixed area of the county. The site is bordered by residential properties to the west and commercial properties to the north and undeveloped properties to the east and south. The approximate latitude of the site is thirty-three degrees, fifty-four minutes, and eight seconds north. The approximate longitude of the site is eighty-five degrees, fifty-four minutes, and fifty-six seconds west. The site is currently not used for dispensing motor fuel of any type.

2.2 Brief History and Chronology of Events

Past site usage related to the investigative activities included storing and dispensing of gasoline fuels from underground storage tanks. A review of the Department's e-File noted a Site Assessment Report was prepared in 1992. A release was reported in 1993 and Notice of Violation was also issued in 1993. Preliminary and Secondary Site Investigations were conducted by Benchmark Engineering in 1994 and 1995. Information regarding six Mobile Enhanced Multi-Phase Extraction (MEME) events conducted under the direction of ELM Consulting, LLC was also available on the e-File system. Additionally, three MEME events were conducted under the direction of CFM Group in 2009. The MEME events utilized multiple extraction wells during each event. CFM Group removed two steel underground storage tanks (UST) and approximately 60 feet of associated product piping in August 2011. Except for boring logs for MW-20 and MW-21D and soil data examined from the UST closure no other soil data was available for review. The boring logs for MW-20 and MW-21D described a residual clay of various color and apparent low permeability. The UST Closure report described the shallow soils as: red clay with rock fragments from 0-4 feet; yellowish-red clay with rock fragments from 4-5.5 feet; reddish-purple clay, mottled with weathered rock fragments from 5.5-8.5 feet; dark gray, reddish-brown clay with weathered rock fragments from 8.5-10.5 feet; dark gray, shaly clay from 10.5-11.5 feet; reddish-brown clay with rock fragments from 11.5-12.5 feet. Pinnacled limestone was observed at the base of the tank pit excavation.

A Corrective Action Plan Evaluation was conducted by CFM Group in 2014 under cost proposal CP-42. The evaluation noted insufficient subsurface information to determine the best remedial technique for site cleanup. However, In-situ Chemical Oxidation (ISCO) or Dual Phase Extraction (DPE), or a combination of these two methods was suggested. Closely spaced ISCO injection wells in the area in and around MW-1 and the former product line area was suggested as less expensive and faster method to the alternative DPE system. In this CP, abandoning and reinstalling damaged Monitoring Well MW-4D was also recommended. The reinstalled monitoring well was to be logged and sampled for permeability and porosity to help add information for determining proper remediation method. The next several CPs were groundwater monitoring and reporting. In the following CP, the damaged Monitoring Well MW-4D was abandoned and reinstalled in the deep aquifer as a Type III well in 2018. The reinstalled well was logged and sampled for permeability and porosity information to help with determining proper remediation method. Following a couple of groundwater monitoring events, a High-Resolution Site Characterization (HRSC) study was performed in August, 2019 under CP-52.

The HRSC concluded that two deeper sources of LNAPL were present at the OIP-6 and OIP-13 probe locations. The greatest thicknesses of residual LNAPL were noted in the depth intervals of approximately 33-45 feet at station OIP-06 and about 32-40 feet at station OIP-13 (30-40 feet bgs). Soil samples from highest OIP response indicated LNAPL presence nearby however the concentrations did not exceed the levels for product mobility according to API guidelines. The study was used to determine locations for two 4-inch recovery well installations. As noted in the HRSC study, drilling of these two new recovery wells reiterated the complexity of geology at the site. Drilling for the two recovery wells on the site was difficult due the presence of limestone pinnacles. Ultimately two-inch diameter prepackaged Type II wells were installed at OIP-06 and OIP-13 locations in May 2020 under CP 56. Utilizing the two recovery wells and MWR-4D during MEME events extraction was recommended. In addition to the groundwater monitoring conducted in pursuant to the normal RNA activities, Poly recommended to have three eight-hour MEME events per tri-annual period for one year. After receiving approval for conducting MEME events and groundwater monitoring events, the next several CPs between 2021 and the present focused on MEME events and groundwater sampling events for some to all wells.

During the past several sampling events, free product has been visibly detected in monitoring wells. Other times, only a strong hydrocarbon odor was detected with no visible product presence. Change in water table levels makes the product appear and reappear in monitoring wells. During wet seasons, the contaminant is trapped within pore spaces by water. Although during some of the sampling events, the contaminants might not be flowing into the well but a strong hydrocarbon odor from samples collected at some of these wells indicate nearby presence of the product. During the dry period, as the water table drops, product flows into the well and is visibly captured. The underground geology, including the limestone pinnacles and clay layers, add layers of complexity to the current remediation process. After discussing the remediation challenges at the site with ADEM, it was decided to modify the current Corrective Action Plan by installing a Dual Phase Extraction (DPE) system on site for a continuous extraction of the product and treatment of groundwater.

3.0 SUMMARY OF PREVIOUSLY CONDUCTED SITE ASSESSMENTS

3.1 High-Resolution LNAPL Assessment Conceptual Site Model Assessment

Poly, Inc. subcontracted Columbia Technologies to conduct HRSC at the site in August, 2019. The study utilized high-resolution technology to target contamination distribution, soil characteristics, and determine location of the monitoring and recovery wells. Thirteen (13) borings were advanced at the site employing direct sensing tools in each boring including the Optical Imaging Profiler (OIP) and Hydraulics Profiling Tool (HPT). Based on the OIPHT data profiles, the residual LNAPL appeared to have a sporadic, discontinuous, and immobile pattern in the top 20 feet of residuum. The HPT response in the upper zone also indicated a lower permeability material. Residual LNAPL was also observed in the lower zone between 30 to 45 feet below ground surface (bgs). The lower zone represented a higher permeability material and a potential source for the sporadic occurrence of free product observed in the down gradient deeper wells, especially MW-14D.

Sampling analysis showed elevated levels of COCs in the upper water bearing zone at Monitoring Wells, MW-1, MW-3, and MW-4. In the shallower zone, the LNAPL appeared to be sporadic, discontinuous, and immobile. This area was noted in between MW-1 and MW-3 at approximately 15 – 20 feet below ground surface (bgs). The deeper zone showed much greater concentration of free product in the 30 – 45 feet bgs depth interval and was observed to be more permeable. This zone was a potential source area for the occurrence of free product occasionally collected from Monitoring Well MW-14D and in MWR-4D.

Based on the HRSC study, it was determined that the LNAPL recovery in the upper zone would be ineffective as the product in this zone is discontinuous and non-extensive. However, because of the higher permeability sediments in the lower zone and the greater mass of LNAPL in this zone, a recovery program will potentially be useful to help eliminate the down gradient movement of LNAPL to the northeast. A MEME program focusing on this area was recommended in lieu of the confirmation soil data. Based on the conclusion from HRSC study, the recovery wells were installed near OIP-06 and OIP-13 and additionally MWR-4D and MW-14D were used as collection points.

4.0 SUMMARY OF PREVIOUSLY CONDUCTED CORRECTIVE ACTION

Corrective Action RNA Monitoring was conducted after the removal of two steel tanks between 2011 and early 2021. During this period, a HRSC study was performed on site that provided more details on the subsurface geology and LNAPL location. This study was used to evaluate the preferred location for the two recovery wells. Following the well installations, three tri-annual MEME events were added along with the RNA Groundwater Monitoring.

Extraction Data Summary

Under CP-69, vacuum readings were recorded during the MEME #3 extraction events. The range of vacuum readings recorded are as follows:

Table 4.1: Vacuum Readings (inches of Hg)

Date	MEME Event Applied Well Head Vacuum (in/Hg)				
	MW-3	MWR-4D	MW-14D	RW-1	RW-2
08/04/25	11	11	11	11	11
	MEME Event Influence Vacuum (" Hg)				
08/04/25	-6.4	-6.5	-7.0	-7.0	-6.9

Water levels were recorded by Poly in adjacent monitoring wells to evaluate the approximate radius of influence. Table 4.2 notes the recorded water levels in monitoring wells around the extraction wells. The water levels were measure prior to the MEME event, then after 30 mins of extraction, later after 1 hour, and the last measurement after 4-hours of extraction process. Table 4.3 notes the aquifer drawdown measured at the different time intervals in the neighboring monitoring wells. During the MEME event, the aquifer drawdown was not significantly noticeable in the neighboring monitoring wells as the vacuum was applied at all the extraction wells at the same time and also due to the complex underlying geology. Wells, MW-3, RW-1, RW-2, MW-14D, MWR-4D were used as extraction wells. The neighboring monitoring wells, MW-6, MW-13D, MW-2, MW-2D were used to measure the resulting aquifer drawdown. The shortest distance between extraction well and measured aquifer drawdown well was 38.5 ft. As the measured aquifer drawdown were small and due to the underlying complex geology, using a smaller or less than 38.5 ft of radius of influence is considered appropriate for the site. A radius of influence of 30 ft was used to estimate the location of new recovery wells.

Table 4.2: Measured Water Levels (ft)

	MEME Water Levels			
	MW-6	MW-13D	MW-2	MW-2D
Initial	17.13	36.86	15.78	33.51
30 mins	16.92	36.83	15.70	33.52
1 hour	17.08	36.89	15.80	33.39
4 hours	17.24	37.35	15.77	33.50

Table 4.3: Aquifer Drawdown (ft)

	MW-3 (Extraction Well)		RW-1 (Extraction Well)	
	MW-6 (40 ft.)	MW-13D (51 ft.)	MW-2 (38.5)	MW-2D (42.5)
Initial				
30 mins	-0.21	-0.04	-0.08	0.01
1 hour	-0.05	0.03	0.02	-0.12
4 hours	0.11	0.49	-0.01	-0.01

	MW-14D (Extraction Well)		MWR-4D (Extraction Well)	
	MW-6 (42.5 ft.)	MW-13D (63 ft.)	MW-6 (38.5)	MW-13D (82.5)
Initial				
30 mins	-0.21	-0.04	-0.21	-0.04
1 hour	-0.05	0.03	-0.05	0.03
4 hours	0.11	0.49	0.11	0.49

	RW-2 (Extraction Well)			
	MW-6 (78 ft.)	MW-13D (81.5 ft.)	MW-2 (84.5)	MW-2D (88.5)
Initial				
30 mins	-0.21	-0.04	-0.08	0.01
1 hour	-0.05	0.03	0.02	-0.12
4 hours	0.11	0.49	-0.01	-0.01

5.0 EXPOSURE ASSESSMENT

The exposure assessment identifies the human receptors which may come into contact with site constituents and the potential routes by which exposure may occur. The identification of potential exposure pathways is not conducted for the environmental medium of interest at the site (groundwater) at this time. However, we are including the ACAL table here (Table 5.1) and the most recent reported COCs under CP-69. All 18 wells were sampled under CP-69. About 1.9 2 inches of free product was detected at MWR-4D. The grey shading denotes COCs above ACAL.

Table 5.1: ACALs for Groundwater (mg/L) and recent COC concentrations and exceedance

Well No.	Benzene (ppm)	Toluene (ppm)	Ethyl benzene (ppm)	Total Xylenes (ppm)	Total BTEX (ppm)	MTBE (ppm)	Naphthalene (ppm)
MW-1	15.4	ND	0.123	ND	15.5	1.49	ND
ACAL	0.093	18.6	13.0	175.0		0.372	
MW-2	ND	ND	ND	ND	ND	ND	ND
ACAL	0.053	10.60	7.44	106.0		0.212	
MW-2D	DRY	DRY	DRY	DRY	DRY	DRY	DRY
ACAL	0.050	9.960	6.990	99.800		0.200	
MW-3	1.21	0.351	1.74	3.67	6.97	ND	1.21
ACAL	0.0929	18.60	13.0	176.0		0.372	
MW-4	1.50	0.022	0.170	0.109	1.80	0.024	0.081
ACAL	0.0929	18.600	13.0	176.0		0.372	
MWR-4D	NS	NS	NS	NS	NS	NS	NS
ACAL	0.0929	18.60	13.0	176.0		0.372	
MW-5	DRY	DRY	DRY	DRY	DRY	DRY	DRY
ACAL	0.0902	18.00	12.6	175		0.361	
MW-6	ND	ND	ND	ND	ND	ND	ND
ACAL	0.067	13.400	9.380	134.0		0.268	
MW-7	0.024	ND	0.009	0.002	0.035	0.005	0.023
ACAL	0.074	14.90	10.40	149.0		0.298	
MW-8	ND	ND	ND	ND	ND	ND	ND
ACAL	0.065	12.900	9.050	129.0		0.259	
MW-13D	1.96	0.060	0.074	0.166	2.26	0.016	0.050
ACAL	0.066	13.200	9.270	132.0		0.265	
MW-14D	0.568	ND	0.491	0.702	1.76	ND	0.310
ACAL	0.055	10.90	7.620	109.0		0.218	

Well No.	Benzene (ppm)	Toluene (ppm)	Ethyl benzene (ppm)	Total Xylenes (ppm)	Total BTEX (ppm)	MTBE (ppm)	Naphthalene (ppm)
MW-20	ND	ND	ND	ND	ND	ND	ND
ACAL	0.031	6.180	4.330	61.800		0.124	
MW-20D	ND	ND	ND	ND	ND	ND	ND
ACAL	0.031	6.260	4.380	62.600		0.125	
MW-21	ND	ND	ND	ND	ND	ND	ND
ACAL	0.033	6.640	4.650	66.400		0.133	
MW-21D	ND	ND	ND	ND	ND	ND	ND
ACAL	0.032	6.330	4.430	63.300		0.127	
RW-1	5.51	0.830	11.4	10.2	27.9	0.468	5.46
ACAL	0.093	18.6	13.0	175.0		0.372	
RW-2	10.3	4.87	3.38	17.9	36.5	0.685	1.09
ACAL	0.0902	18.00	12.6	175		0.361	

NS: Not sampled due to insufficient groundwater volume or product detected
ND: Not Detected or below detection level

6.0 PROPOSED REMEDIATION METHOD

The HRSC Report from 2019 was referred to for analyzing a suitable remediation method. Based on the HRSC report, the residual LNAPL appeared to be sporadic, discontinuous and immobile in the top 20 feet of residuum. The upper zone also showed low permeability material. Residual LNAPL was observed in the deeper zone, between 30-45 feet below ground surface (bgs). The deeper zone also showed higher permeability material and is possibly a contributing source of sporadic occurrence of free product observed in the down gradient deeper wells. During the past several groundwater monitoring events, analytics and field observations have shown the presence of petroleum products in deeper wells, mostly during the dry periods when the water levels are low. During the wetter periods, higher volume of water traps the product in the pore spaces of the underlying sediment, making the product less visible in the wells.
Due to the underlying complex geology of limestone pinnacles, clay constituents, and the sporadic nature of the residual LNAPL, remediation using a Dual Phase Extraction (DPE) system method is proposed for this site. The system can extract contaminants in their liquid or vapor form, thereby potentially being effective during the wet and dry season. This approach will serve to reduce contaminant levels and their migration.
Poly collected soil samples from the concrete area in front of the existing building in November 2025. The soil sample analytics, results, and recommendations were submitted in CP-74 report. Based on the soil data analyzed, elevated concentrations of petroleum hydrocarbons were recorded for boring samples collected from around the mid-section of the former dispenser area at 5-10 feet depth. The subsurface contamination can potentially seep into the shallow groundwater in the region. In order to accelerate the remediation process, using a DPE system, Poly recommends excavating a portion of concrete and soils in the mid-section area of the former dispenser island to depths deeper than 10 feet, possibly up to 15 feet, based on subsurface observations during excavation. Attachment E includes cost scenarios for excavation with and without canopy.

Based on recent and past groundwater sampling data, the dissolved BTEX and MTBE plumes generally encompass the area around the dispensers, east and northeast of the existing building. After the DPE system is installed, the contaminated groundwater and soil vapor will be recovered from the site using a liquid ring vacuum pump located behind the building. Currently, the northeast corner of the site, behind or north of the existing building is considered as a potential location for the DPE system set up. This location will be modified based on the owner's future plans for the site use. The remediation system will be capable of being monitored remotely through a basic telemetry system, and will be constructed to comply with the most recent NEC. Groundwater monitoring events are proposed to evaluate the effectiveness of the remediation methods.

A placard will be installed on the fencing surrounding the remediation system stating that the equipment is for groundwater clean-up and providing the name, address, and telephone number of the consultant. A phone number for the equipment's emergency responder will also be listed.

The following sections describe the design criteria for the proposed system and provide a detailed description of the remediation methodology.

6.1 Groundwater Extraction Evaluation

Poly used a couple of monitoring wells near the MEME extraction wells to measure drawdown during the MEME event conducted on 08/04/2025. This data was used to determine an approximate radius of influence of 30 feet at approximately 11 inches of mercury vacuum. In addition, the historical water levels, chemical concentration data, and HRSC study were used to evaluate locations for the recovery wells.

6.2 Well Placement and Design

The historical COCs, water levels, and HRSC study were carefully studied to evaluate locations of the proposed new recovery wells. Poly recommends installing five 4-inch recovery wells for groundwater and vapor extraction on the site. The current recovery wells, RW-1 and RW-2 should be over drilled to 45 feet with 20 feet of screen. Similarly, MWR-4D, should be over drilled to 35 ft with 20 feet of screen. This recovery well can be identified as RW-3. A new recovery well, RW-4, can be installed near MW-3 at a 45-foot depth and 20 feet of screen. Another new recovery well, RW-5, can be installed between MW-6 and MW-14D at 45 feet depth with 20 feet of screen. Figures for recovery well locations are included in Appendix A. The proposed depths of these recovery wells are subject to change based on the underlying geology and drilling challenges encountered during well installations.

The wellheads are proposed to be housed in 2' x 2' metal vaults. The wells will be constructed of Schedule 40 PVC with clean filter sand placed to approximately two feet above the top of the screened interval. A two-foot-thick bentonite seal will be installed above the sand pack and the remainder of the borehole would be grouted to the surface with Portland cement.

All the recovery wells will be connected to the remediation system via 2-inch PVC piping laid at a depth of approximately two feet below ground surface. The maximum total flow of impacted groundwater to the treatment system is estimated to be less than 5 gpm, with peaks in flow during rainy periods. All trenching in existing paved areas will be covered with concrete and crushed stones.

6.3 Groundwater Treatment and Discharge

The proposed system components will be adequate in size and design to accommodate the influent fluid and vapor flow rates from the recovery wells. Upon transfer to the remedial system enclosure, the fluid and vapors will be pumped via an oil sealed liquid ring blower (40 HP) through a approximate 200-gallon air/water separator. The air will be routed to an air treatment system consisting of vapor phase carbon vessels. The liquid will be pumped to a 15-gpm capacity oil/water separator and air stripper unit. The low-profile, shallow tray air stripper will include a 2.0 HP blower. Separated free-phase product will be stored in the oil/water separator unit with product being transferred to a 55 gallon oil drum upon reaching capacity in the oil/water separator. The unit's blower will discharge to the atmosphere. The water effluent from the oil/water separator and air stripper unit will be pumped through a 4-inch diameter PVC pipe to the drain. Poly has included costs for air treatment options in the equipment specs (Appendix E). Based on the vapor treatment required for the extracted contaminants, there is either a Catox Rental package or Vapor Carbon Purchase Package.

In the event of a high-float condition in the air/water separator or in the low-profile air stripper, or if a loss of air pressure occurs in the air stripper, the control panel will shut down the liquid ring vacuum system thus preventing discharge of untreated groundwater. In case of a shutdown, the system must be reset via telemetry or manually on-site.

The treatment system would be housed in an enclosure located on the north east side of the existing building (subject to change). A gravel pad will be constructed to provide for proper leveling. A price quote for the proposed remediation system equipment and installment is provided in Appendix E. The system spec excludes costs for permits, fees, offloading, and placement. These additional fees will be evaluated and added to the next cost proposal.

6.4 System Effectiveness Monitoring

Poly proposes to conduct quarterly groundwater monitoring events at the site to gather groundwater analytical data of the contaminant constituents and to establish a historical trend of reported constituent values. Groundwater monitoring requirements for the proposed events are included in Section 14.0. Groundwater samples are proposed to be collected from the 20 (including two new proposed recovery wells) monitoring wells associated with the site and analyzed for BTEX – MTBE and naphthalene. The groundwater constituent values will be utilized to demonstrate the effectiveness of the proposed remediation method. Poly proposes to utilize the site-specific target levels (ACALs) developed for the Tier 2 ARBCA as clean-up goals for this corrective action plan.

7.0 RATIONALE FOR SELECTION OF REMEDIATION METHODS

7.1 Dual Phase Extraction (DPE)

Dual phase extraction and pumping involves using a liquid ring pump attached to a PVC or rubber stinger to aid in applying a vacuum to the subsurface for total fluids and vapor removal.

Dual phase extraction systems are recommended for sites where large amounts of liquid phase hydrocarbons are recoverable. Due to the amount of dissolved product present and the underlying complex geology at the site, the dual phase extraction system is a viable option for the site.

The remedial benefits of implementing a dual phase extraction system at the site are two-fold. First, dewatering of the soil enhances the soil vapor extraction process by allowing air flow to occur where water once resided and limited air flow. Secondly, the application of a vacuum to the well enhances groundwater flow rates by adding a vacuum gradient to the gravitational gradient produced from pumping. The system, as a whole, will operate efficiently when it is extracting both groundwater and soil vapor, as well as when the water table is dewatered and the system is only extracting soil vapor.

7.2 Groundwater Treatment Technology Selection

7.2.1 Groundwater Treatment Technologies

The selection of an appropriate groundwater treatment technology is based on the expected flow rate of the recovery system, the contaminant concentrations of the water flowing into the treatment unit, and discharge limitations. Several treatment approaches were considered, including bioremediation, granular activated carbon adsorption, and air stripping.

Low Profile Air Strippers – Low profile tray air strippers consist of a series of aeration trays set on a sump tank. A blower forces air through holes in the bottom of the trays to provide the turbulence and air/water interface necessary to volatilize organic compounds.

Low profile air strippers have three primary advantages for the treatment of groundwater contaminants. First, they provide higher BTEX removal efficiencies at lower air flow rates than packed tower strippers. Operational efficiencies have been observed in excess of 99.99% with air flow rates from 300 to 600 cubic feet per minute (cfm). Second, low profile air strippers are relatively compact in size, and can be completely contained within an equipment shed. A third benefit is that they are not as prone to solids fouling as packed towers, yet they remove the larger iron particles from solution. The turbulence caused by the aeration tends to encourage the solids to remain suspended through the aeration trays. The water collection sump is designed to encourage iron deposition. Since the aeration trays are easily removed, iron and solids can be readily cleaned from both the trays and sump, resulting in lower maintenance costs.

Due to their high dissolved volatile removal rates, compact size and low operation and maintenance costs, air stripping technology is considered the most cost-effective groundwater treatment technology for this site.

7.3 Off-Gas Vapor Treatment Technology Selection

7.3.1 Vapor Phase Carbon Adsorption

Vapor phase carbon adsorption involves passing the contaminated soil vapor through carbon canisters for treatment. VOC-laden air passes from the SVE blower through the carbon units, where the petroleum hydrocarbons are removed from the air by their affinity for the carbon. The efficiency of vapor phase carbon adsorption is directly related to the influent flow rate and temperature, the concentration of VOCs to be adsorbed, and the VOCs' affinity for carbon adsorption. If the carbon canisters are not designed for the proper conditions, then full adsorption may not be maintained and frequent carbon service will result in high operation and maintenance costs.

7.3.2 Catalytic Oxidizer

The Catalytic Oxidizer can be used in the system to effectively treat contaminated soil vapors by oxidizing petroleum hydrocarbons using a catalyst and thereby maintain emissions within

regulatory limits. Catalytic oxidizers can be energy efficient but require proper maintenance of the catalyst. A catalytic oxidizer can be used, if need be, for the vapor treatment at the site.

7.4 Groundwater Effluent Disposal Technology Selection

7.4.1 Stormwater Sewer Discharge (NPDES General Permit)

The treated effluent from the system is proposed to be discharged to the stormwater drainage feature in front of the site. As the groundwater treatment system effluent would discharge into a surficial water, ultimately, a National Pollutant Discharge Elimination System (NPDES) permit would have to be obtained. The Industrial Branch of the ADEM Water Division regulates discharge of any surface water or groundwater from investigative and corrective actions at UST sites. Permits are usually awarded within 30 days of the application date.

8.0 PROPOSED OPERATION AND MAINTENANCE OF REMEDIATION SYSTEM

Prior to system startup, Poly will prepare an operation and maintenance manual (O&M), which will include as a minimum the following:

- Remediation system inspection;
- Maintenance schedule/tasks for each system component;
- Logic process diagram for system controls;
- Manufacturers' data and installation instructions;
- Diagram of system layout including valves and sample ports;
- Startup/shutdown procedures;
- Safety precautions; and
- Troubleshooting section.

8.1 System Maintenance

The system will be monitored and inspected twice a month by properly trained Poly personnel. Routine site visits will include the following:

- Inspection of system components and piping for leaks, odd noises and excess heat;
- Performance of minor repairs and/or scheduling of major repairs if required;
- Inspection of all well heads;
- Measurement of free phase hydrocarbons in oil/water separator tank;
- Lubrication of rotary equipment, as required;
- Monitoring of operating pressures and flows (adjustment as required); and
- Monitoring of electrical controls and fuses for proper operation.

9.0 PROPOSED REPORTING REQUIREMENTS

Proposed reporting requirements include the following actions:

- System delivery notification within fifteen (15) days of delivery of the remediation system to the site;
- Start-up notification within fifteen (15) days of corrective action start-up;
- Report of corrective action implementation within 180 days of CAP approval (report to include as-built drawings of system and analytical results of start-up sampling event if necessary);
- Reporting of corrective action effectiveness (quarterly), to include the following:

  Analytical results, water level measurements, discharge rates and volumes, system effectiveness, etc.;

  - Operating results, pump rates, air flow rates, pressure measurements; and

  - Discussion of any system modifications performed or proposed.
- Request for cessation of corrective action, including data indicating attainment of clean-up goals or request for monitoring only, discussion of proposed methods to remove and dispose of any on-site equipment, and discussion of procedures to properly plug and abandon all existing monitoring and recovery wells;
- Site Closure Report, to provide details of well abandonment, removal of equipment, clean-up of site, and disposition of equipment.

10.0 PROPOSED POWER REQIUREMENTS

The DPE System will require a three-phase power connection. Currently the site does not have a three-phase power connection. Alabama Power has reviewed the system's power requirements and based on the load form details, the calculated revenue covers the work Alabama Power would perform to provide the 3Ø 120/240V 400A service for the remediation site. A new business revenue projection was applied based on the details submitted on the load form. Any changes to the service requirements may affect the estimate and could result in additional costs. After the Department approves the system installation plan, Poly will send an application to Alabama Power for the power requirement. Based on the evaluation during the service application process, Alabama Power might require a deposit. An initial sketch from Alabama Power outlining the scope of work required to complete the 3Ø service is included in Attachment E.

11.0 PERMIT REQUIREMENTS

Poly is in the process to apply for the NPDES permit, (Form 394, $1,385) for treated groundwater discharge to surface water drainage feature and are also evaluating options for DPE Off gas treatments and required air permit.

12.0 SCHEDULE OF IMPLEMENTATION

The proposed implementation schedule is presented below. This schedule may be modified in the event that plan reviews are delayed.

PROPOSED IMPLEMENTATION SCHEDULE	
Task	**Schedule**
ADEM Issues Notice of Approval	Estimate by June, 2026
Poly orders treatment system equipment	30 days from CAP approval
Trenching and system installation	120 days from CAP approval
System startup	140 days from CAP approval
System evaluation and modifications	Twice per Month
Corrective action effectiveness reporting and sampling	Quarterly

Poly estimates a clean-up time of approximately three to four years for this site based on historical groundwater data and results obtained so far.

13.0 CONCLUSIONS AND RECOMMENDATIONS

In summary, the following corrective action components have been selected for the site:

- Groundwater and soil vapor extraction utilizing five recovery wells and dual-phase extraction system;
- Groundwater treatment including air/water separation followed with oil/water separation and air stripping;
- Off-gas vapor treatment utilizing vapor-phase carbon and thermal catalytic oxidizer, if required; and
- Treated effluent discharge under an NPDES discharge permit.

14.0 FIGURES

Figures are located in the appendices. A site map for recovery well locations and system design are included.

15.0 APPENDICES WITH SUPPORTING DATA

Following is a list of the attached appendices with supporting data:

- Appendix A – Current Figures
- Appendix B – Historical Figures
- Appendix C – MEME Reports
- Appendix D – Manual Calculations
- Appendix E – Price Quotes from Sub-Contractors
- Appendix F – Site Health and Safety Plan

16.0 QUALITY ASSURANCE/QUALITY CONTROL PLAN

The purpose of this section is to provide the quality assurance/quality control guidelines and methods for collecting environmental samples and field data. This document addresses the measures, procedures, and techniques to be used during typical data collections.

The Project Manager is responsible for assuring that the standards set forth herewith are followed on this project. Department managers are responsible for assuring that all professionals in the respective departments are familiar with these procedures and have received proper training in their application.

System effectiveness monitoring activities will be conducted twice per month. An operation and maintenance (O&M) manual will be prepared and will address those items listed in Section 8.0. Poly will adhere to the requirements set forth in the O&M manual for each of the two monthly visits.

Sampling and analysis of groundwater from each of the 20 monitoring wells will be performed on a quarterly basis. Groundwater in each monitoring well will be measured to determine depth prior to sampling. Samples will be obtained utilizing disposable bailers. Each groundwater sample will be analyzed for BTEX – MTBE and naphthalene according to EPA Method 8260. In addition, a duplicate sample will be collected from one of the monitoring wells for quality control/quality assurance purposes and analyzed for the same parameters using EPA Method 8260.

During the monthly system effectiveness inspections, a system effluent water sample will be obtained at the discharge outlet for compliance purposes. Samples will be analyzed for BTEX/MTBE, pH, and Oil and Grease as part of the sanitary sewer discharge requirements.

To document sample possession from the time of collection until the sample has been received by the laboratory's sample custodian, a Chain-of-Custody Record will be completed by the field personnel and will accompany each sample shipment. While in the field, the care and custody of the samples will be the field sampler's personal responsibility until they are transferred or properly dispatched. This Chain-of-Custody procedure will be followed during all sampling assignments, regardless of the ultimate use of sample data.

To provide for proper identification in the field and proper tracking in the laboratory, all samples will be labeled in a clear and consistent fashion. Sample labels are to be waterproof and to have a pre-assigned unique number. Field personnel will maintain a bound field notebook. This notebook must be water resistant with sequentially numbered pages. Field activities will be recorded in ink. The notebook, along with the Chain-of-Custody record, will contain sufficient information to allow reconstruction of the sample collection and handling procedures at a later time.

Each sample shall have a corresponding notebook entry that includes:

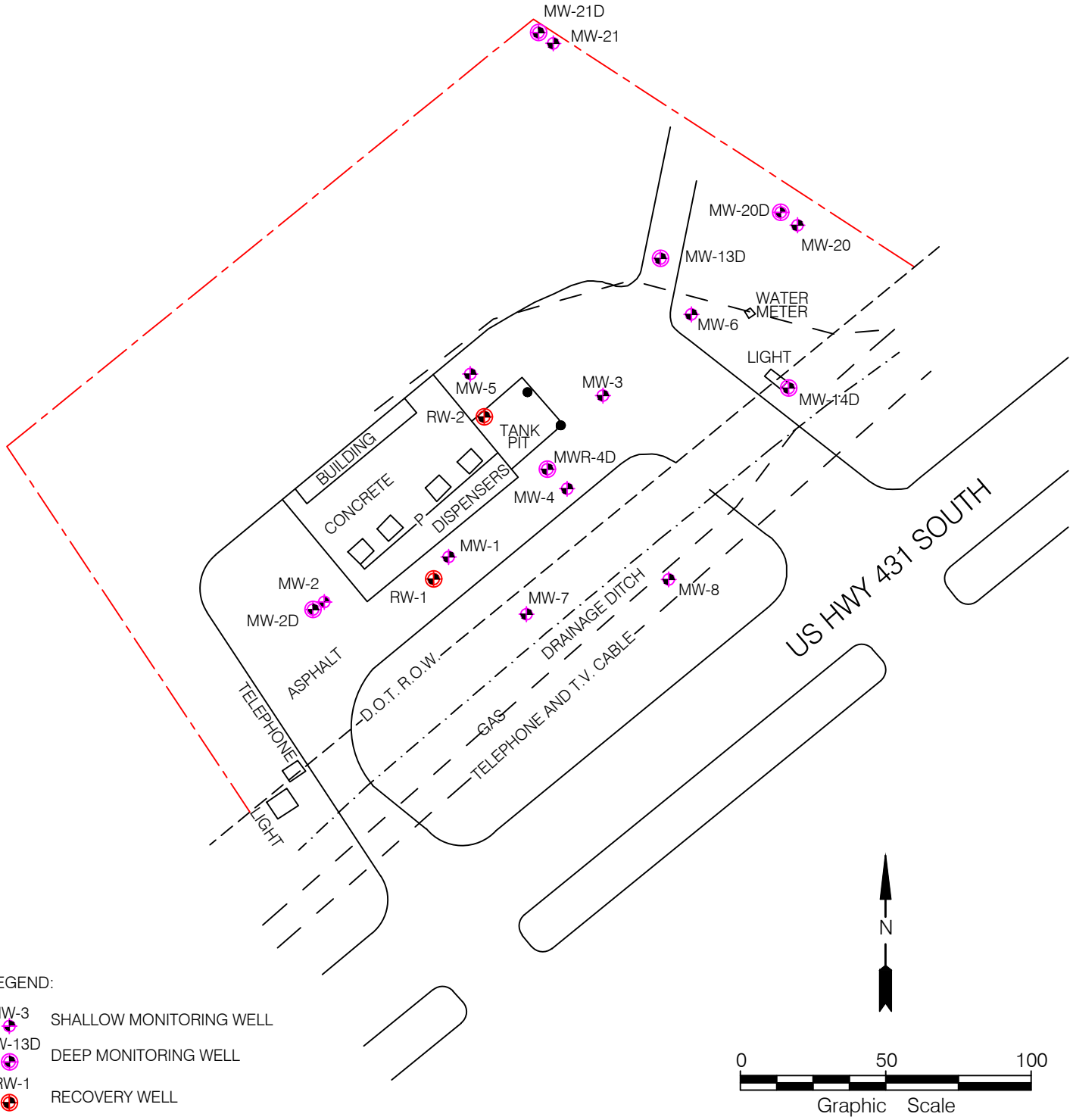
- Unique sample I.D. name or number;
- Date and time of collection;
- Sample type (composite or grab);
- Analysis for which the sample was collected;
- Method of preservation; and
- Additional comments as necessary.

Each sample must have a corresponding entry on a Chain-of-Custody Record. The form is to include the following information:

- Site name;
- The unique sample I.D. name or number;
- Sample matrix;
- Date and time of sample collection;
- Number of containers;
- Analysis requested;
- Signature of sampler(s); and
- Inclusive dates, times and signature(s) of persons responsible for sample possession.

APPENDIX A

Figures



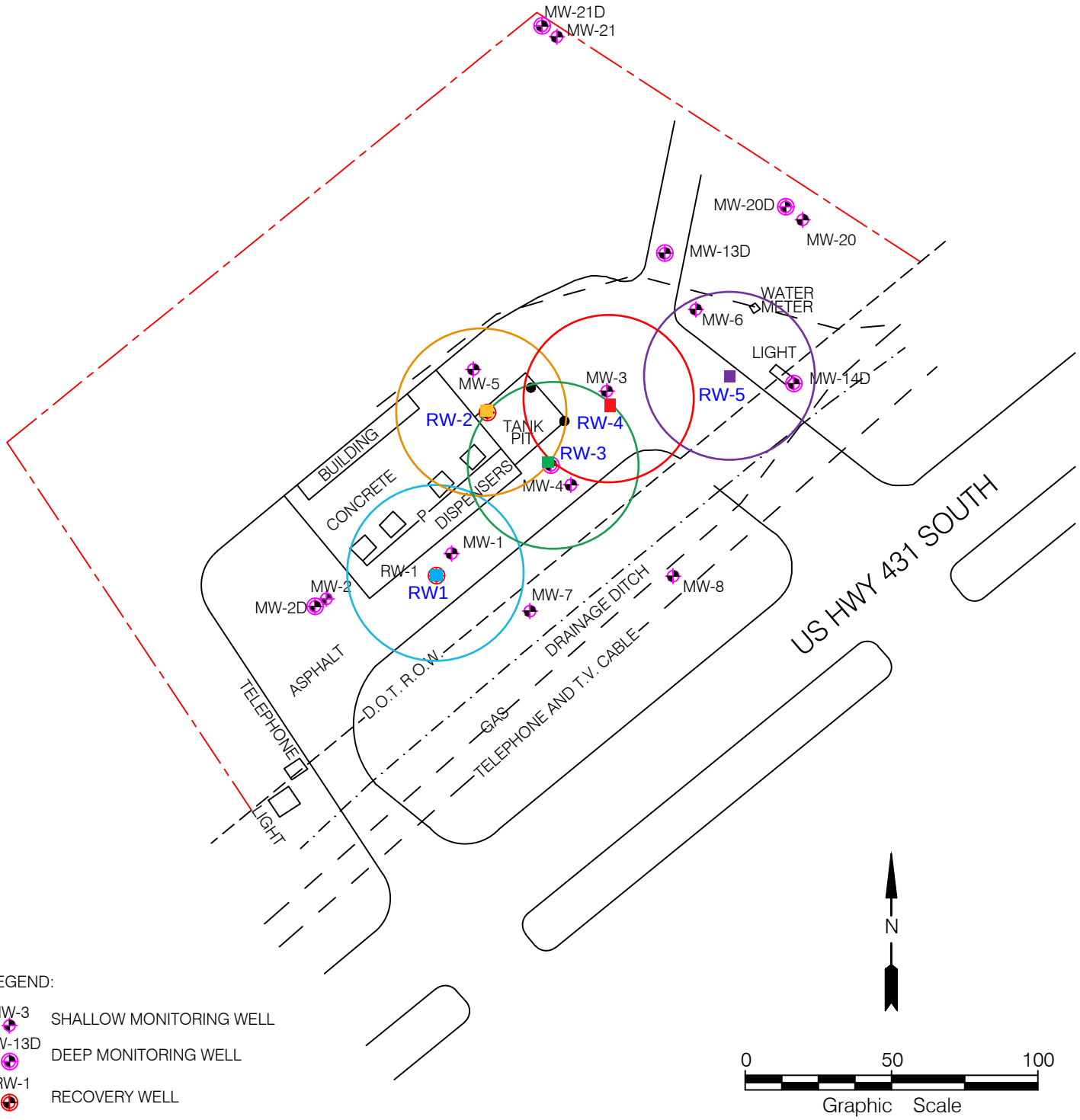
LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

FIGURE No. 1	SITE MAP PROJECT NO. 8525061, CP-70 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: DRAWN BY: GJK DATE: FEBRUARY 2026 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. (AL. / FL. / GA.) ARCHITECT CA-0480 / AA-C001551 / 001118 ENGINEER CA-78-E / CA-1818 / 001118



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

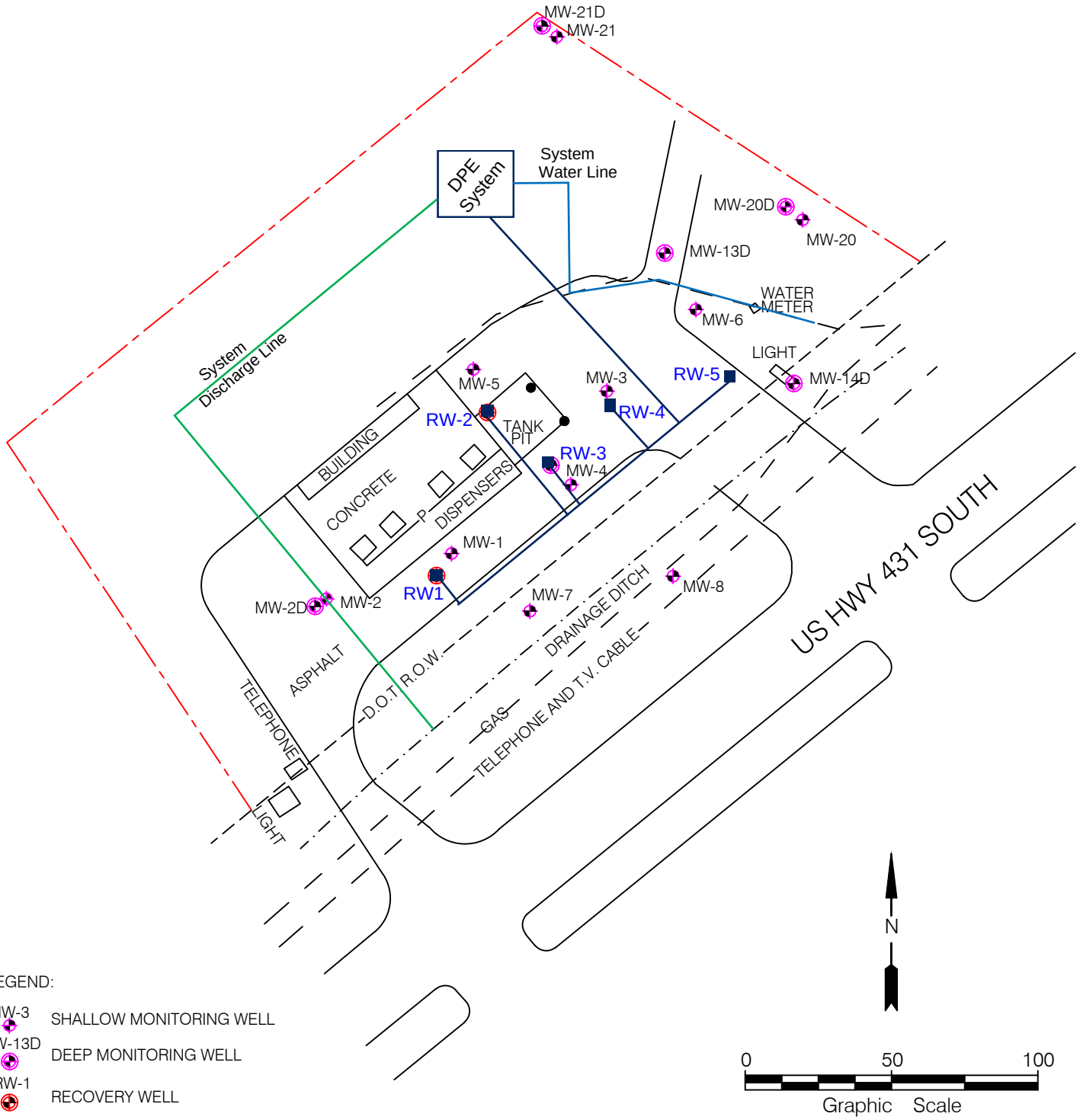
Radius of influence is approx. 30 ft.

FIGURE No.	RADIUS OF INFLUENCE MAP PROJECT NO. 8525061, CP-70 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane, Shalimar, FL 32579, 850-609-1100
117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: GJK	DATE: February 2026
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118



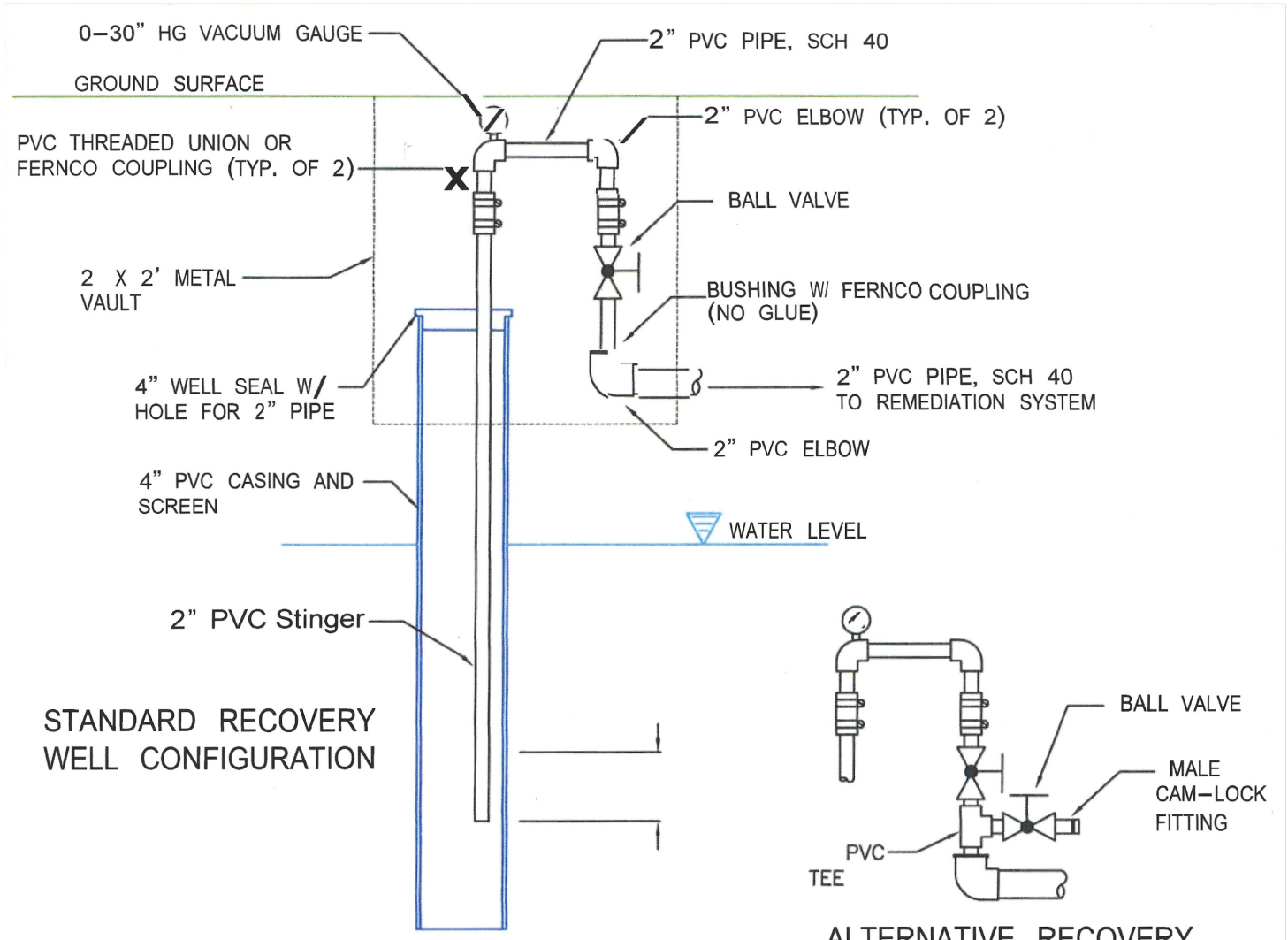
LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

FIGURE No. 3	SYSTEM AND TRENCHES LAYOUT PROJECT NO. 8525061, CP-70 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: DRAWN BY: GJK DATE:FEBRUARY 2026 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. (AL. / FL. / GA.) ARCHITECT CA-0480 / AA-C001551 / 001118 ENGINEER CA-78-E / CA-1818 / 001118



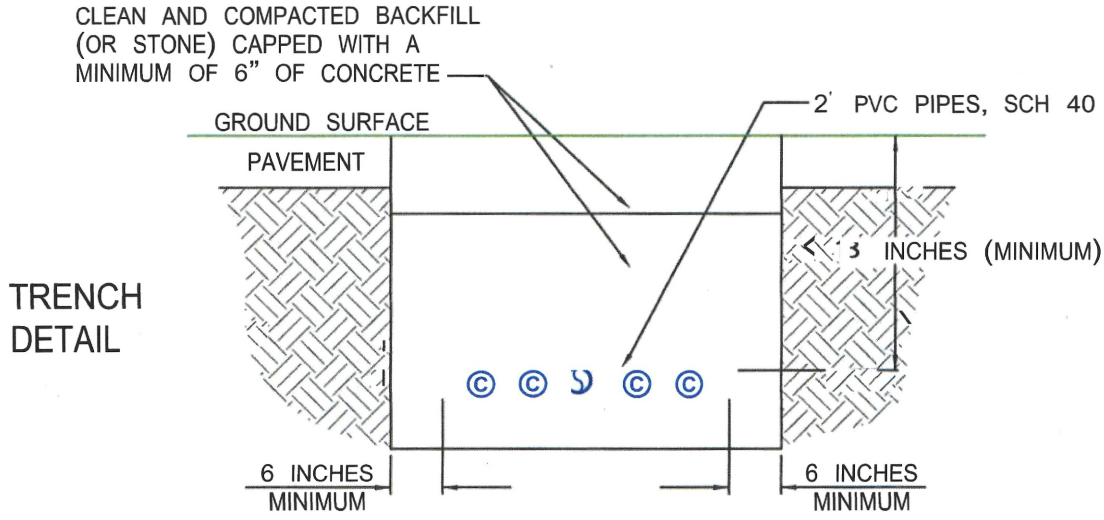
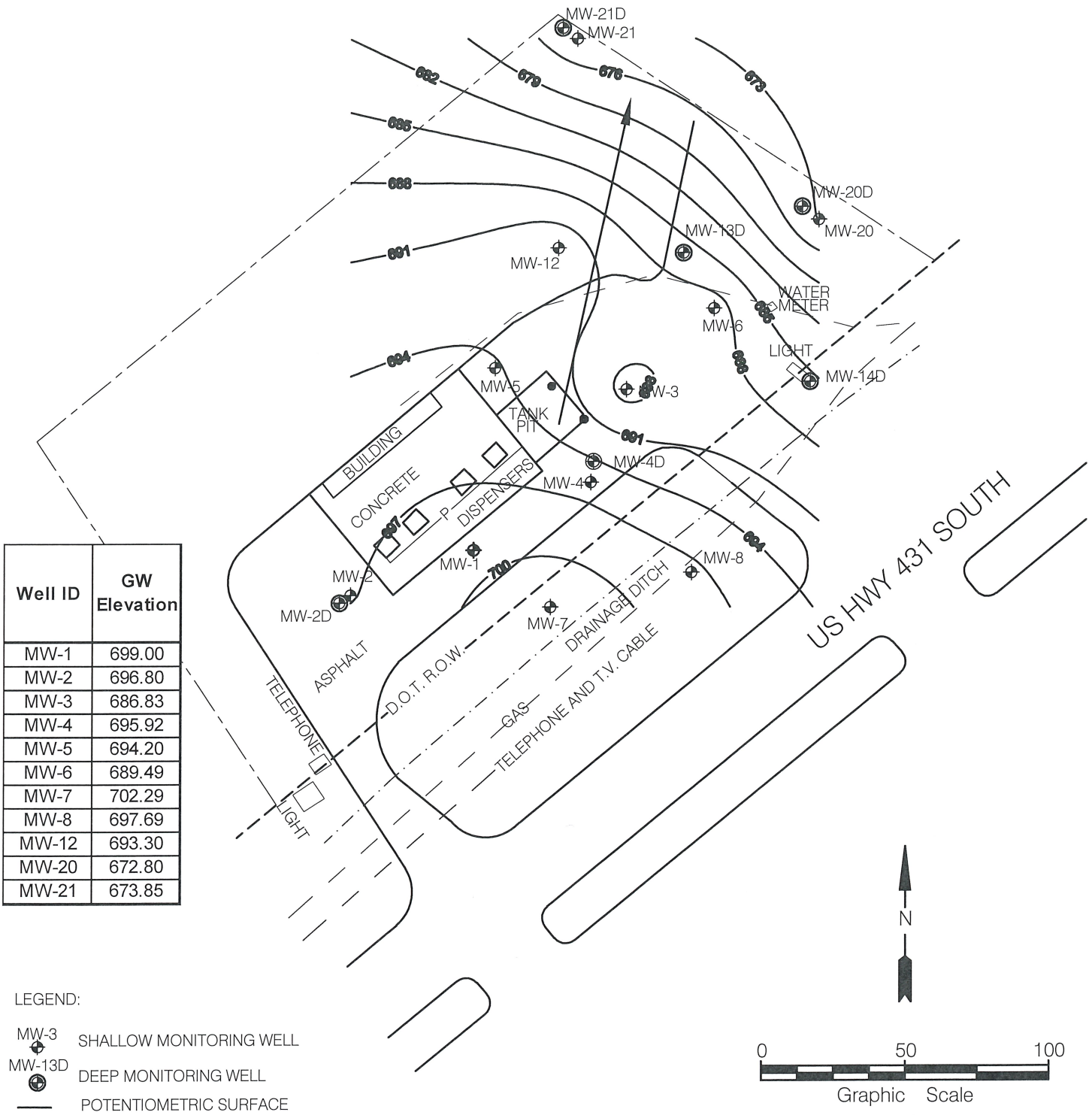


FIGURE No.	RECOVERY WELL AND TRENCH DETAILS PROJECT NO. 8525061, CP-70 (2-10-26) RJ'S SERVICE STATION 16051 US HIGHWAY 431 SOUTH GLENCOE, CALHOUN COUNTY, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY:	DRAWN BY: GJK	DATE: FEBRUARY 2026
			ENG / ARCH OF RECORD:		REGISTRATION No.
			Cert. of Auth. No.	AL. / FL. / GA.	
			ARCHIT ECT	CA-0480 / AA-C001551 / 001118	
			ENGINEER	CA-78-E / CA-1818 / 001118	

APPENDIX B

Historical Figures



Well ID	GW Elevation
MW-1	699.00
MW-2	696.80
MW-3	686.83
MW-4	695.92
MW-5	694.20
MW-6	689.49
MW-7	702.29
MW-8	697.69
MW-12	693.30
MW-20	672.80
MW-21	673.85

LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

POTENTIOMETRIC SURFACE

FIGURE No. 2

SHALLOW POTENTIOMETRIC ELEVATION MAP
(9-4-2019)
PROJECT NO. 7519045, CP-53

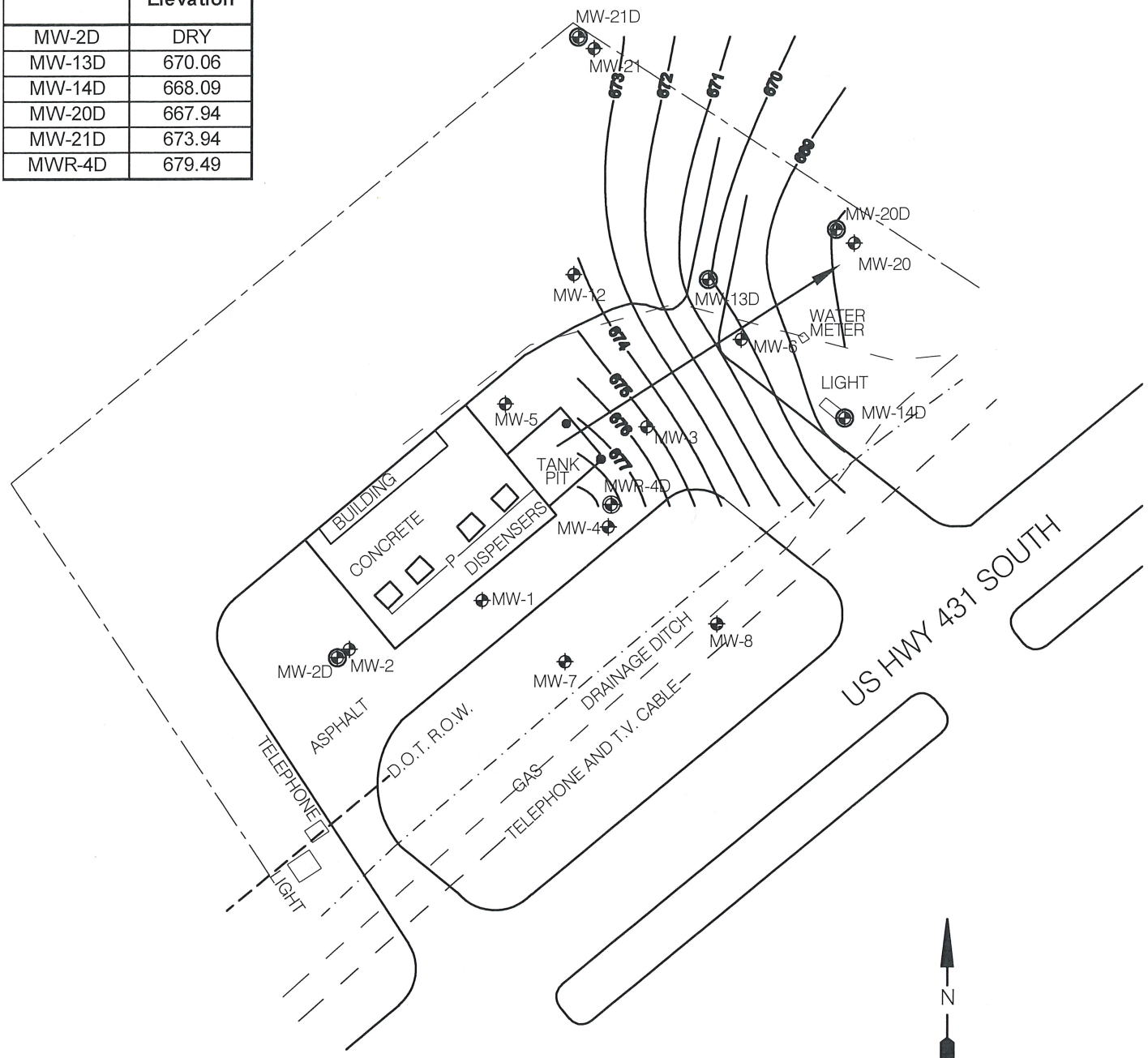
RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane
Shalimar, FL 32579
850-609-1100
2135 University Blvd. Ste. A
Tuscaloosa, AL 35401
205-752-4037
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: JLM	DATE: SEPTEMBER 11, 2019
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-76-E	CA-1818	001118
SURVEY	CA-0018-LS	LB7527	LSF0013

Well ID	GW Elevation
MW-2D	DRY
MW-13D	670.06
MW-14D	668.09
MW-20D	667.94
MW-21D	673.94
MWR-4D	679.49



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

POTENTIOMETRIC SURFACE

FIGURE No. 3

DEEP POTENTIOMETRIC ELEVATION MAP
(9-4-2019)
PROJECT NO. 7519045, CP-53

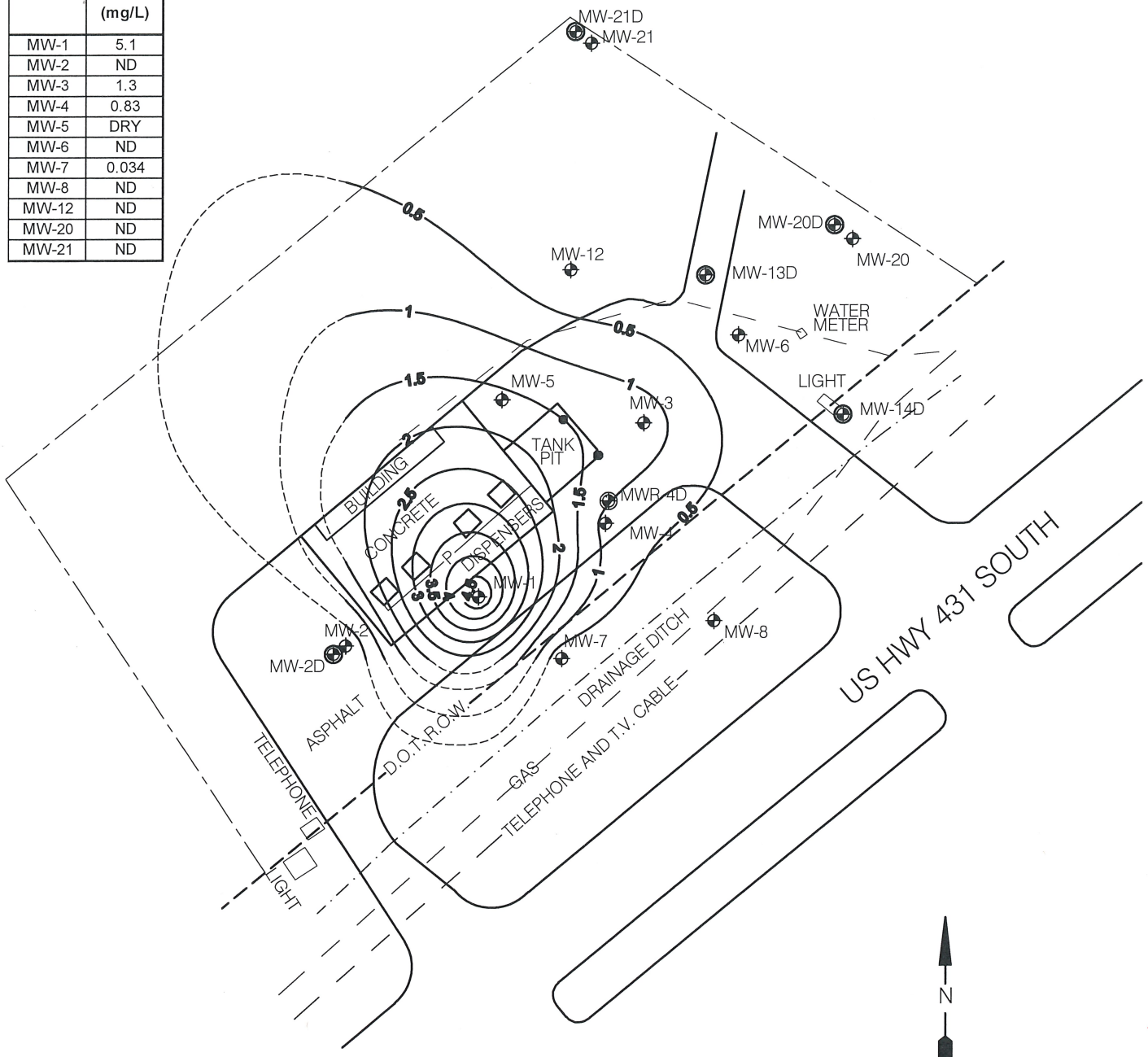
RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane Shalimar, FL 32579 850-609-1100
2135 University Blvd. Ste. A Tuscaloosa, AL 35401 205-752-4037
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: JLM	DATE: SEPTEMBER 11, 2019
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118
SURVEY	CA-0018-LS	LB7527	LSF00132

Well ID	Benzene Conc. (mg/L)
MW-1	5.1
MW-2	ND
MW-3	1.3
MW-4	0.83
MW-5	DRY
MW-6	ND
MW-7	0.034
MW-8	ND
MW-12	ND
MW-20	ND
MW-21	ND



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

—1— ISOCONCENTRATION (ppm) (BENZENE)

FIGURE No. 4

SHALLOW BENZENE CONTOUR MAP
(09-04-2019)
PROJECT NO. 7519045, CP-53

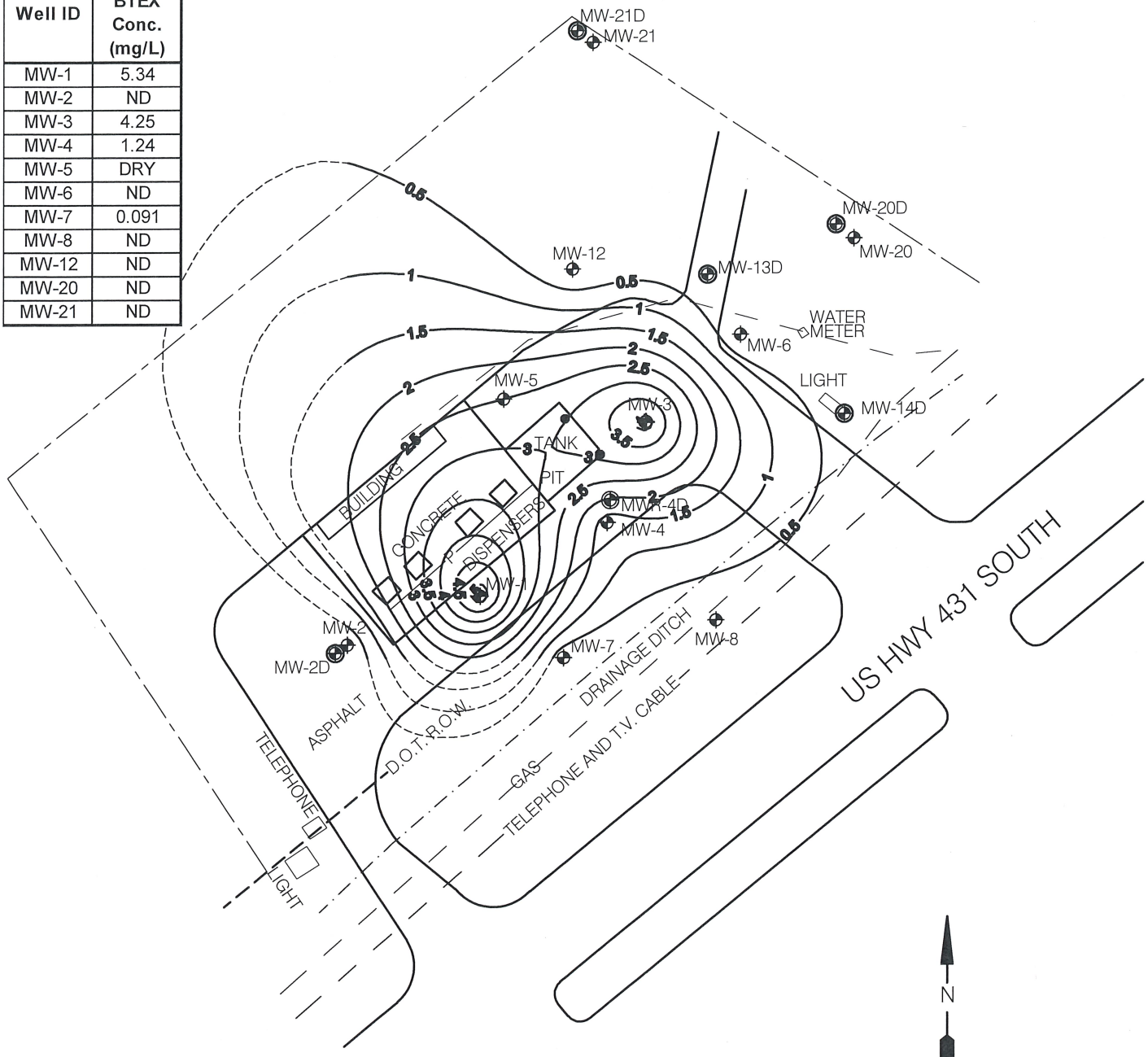
RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane Shalimar, FL 32579 850-609-1100
2135 University Blvd. Ste. A Tuscaloosa, AL 35401 205-752-4037
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: JLM	DATE: SEPTEMBER 18, 2019
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL	FL	GA
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001116
SURVEY	CA-0018-LS	LB7527	LSF00132

Well ID	Total BTEX Conc. (mg/L)
MW-1	5.34
MW-2	ND
MW-3	4.25
MW-4	1.24
MW-5	DRY
MW-6	ND
MW-7	0.091
MW-8	ND
MW-12	ND
MW-20	ND
MW-21	ND



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

—1— ISOCONCENTRATION (ppm) (TOTAL BTEX)

FIGURE No. 5

SHALLOW BTEX CONTOUR MAP
(09-04-2019)
PROJECT NO. 7519045, CP-53

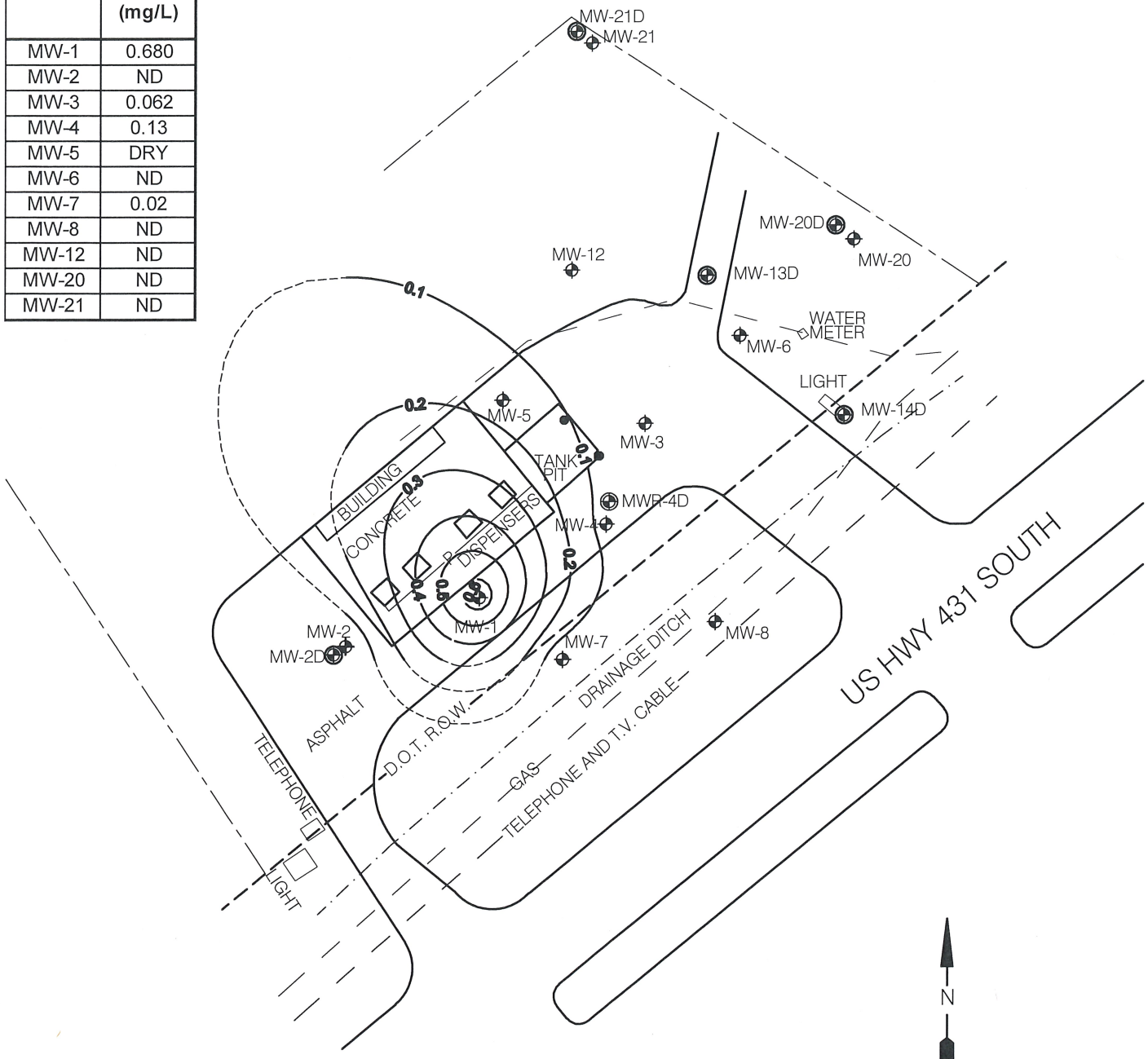
RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane Shalimar, FL 32579 850-609-1100
2135 University Blvd. Ste. A Tuscaloosa, AL 35401 205-752-4037
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: JLM	DATE: SEPTEMBER 18, 2019
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL	FL	GA.
ARCHIT'ECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118
SURVEY	CA-0018-LS	LB7527	LSF00132

Well ID	MTBE Conc. (mg/L)
MW-1	0.680
MW-2	ND
MW-3	0.062
MW-4	0.13
MW-5	DRY
MW-6	ND
MW-7	0.02
MW-8	ND
MW-12	ND
MW-20	ND
MW-21	ND



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

—1— ISOCONCENTRATION (ppm) (TOTAL MtBE)

FIGURE No. 6

SHALLOW MTBE CONTOUR MAP
(09-04-2019)
PROJECT NO. 7519045, CP-53

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

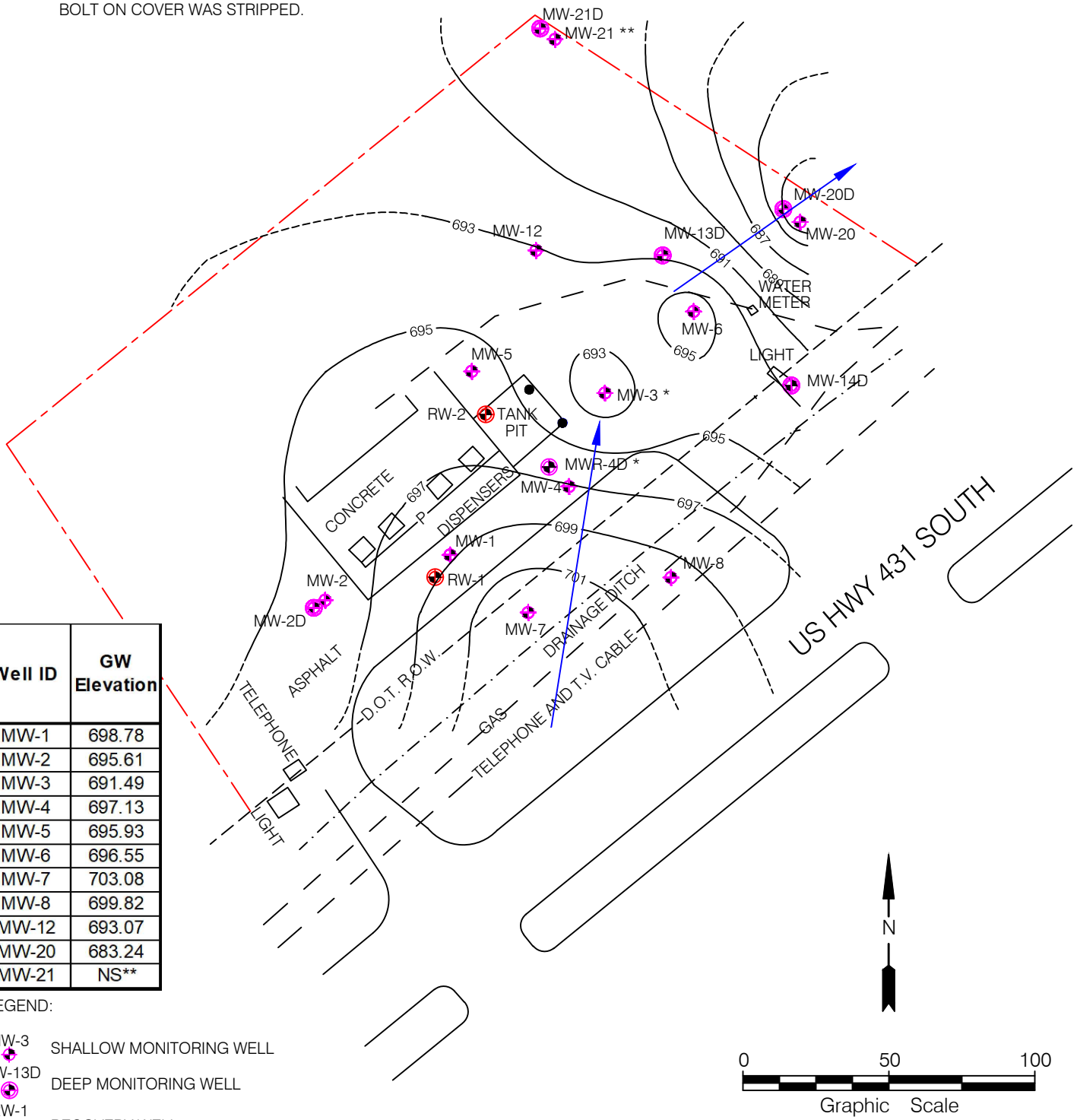
POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane Shalimar, FL 32579 850-609-1100
2135 University Blvd. Ste. A Tuscaloosa, AL 35401 205-752-4037
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: JLM	DATE: SEPTEMBER 18, 2019
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHIT'ECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118
SURVEY	CA-0018-LS	LB7527	LSF00132

* WELLS MW-3 AND MWR-4D HAD FREE PRODUCT AND WERE NOT SAMPLED.

** COULD NOT OPEN WELL MW-21 TO TAKE A WELL DEPTH BECAUSE THE BOLT ON COVER WAS STRIPPED.



Well ID	GW Elevation
MW-1	698.78
MW-2	695.61
MW-3	691.49
MW-4	697.13
MW-5	695.93
MW-6	696.55
MW-7	703.08
MW-8	699.82
MW-12	693.07
MW-20	683.24
MW-21	NS**

LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

POTENTIOMETRIC SURFACE

FLOW DIRECTION (APPROXIMATE)

FIGURE No.	SHALLOW POTENTIOMETRIC SURFACE MAP (08-11-22) PROJECT NO. 8521119, CP-61 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane Shalimar, FL 32579 850-609-1100 117 Gemini Circle, Ste. 416 Birmingham, AL 35209 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY:	DRAWN BY: JDP	DATE: SEPTEMBER 2022
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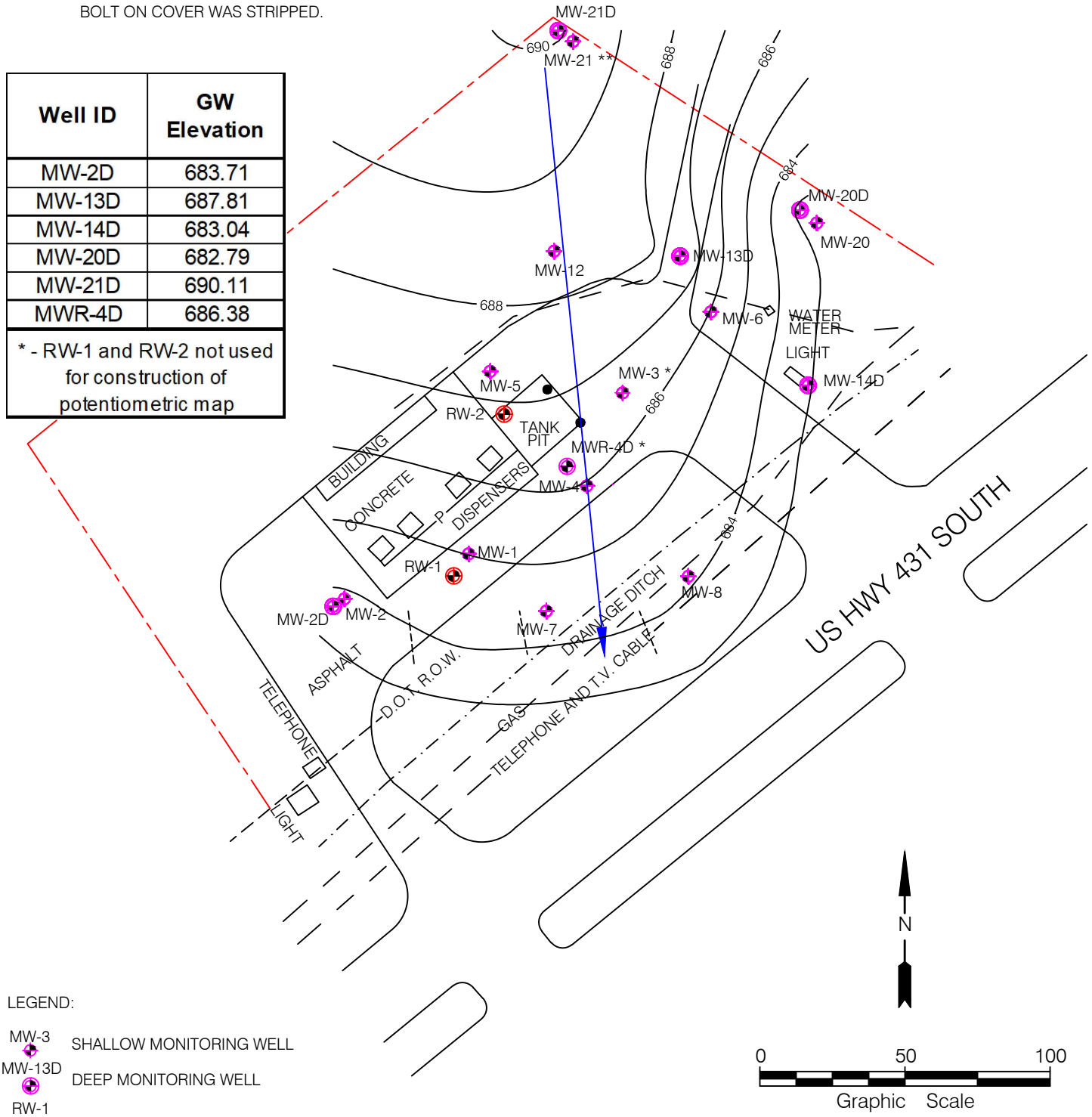
			ARCHIT ECT CA-0480 AA-C001551 001118		
			ENGINEER CA-78-E CA-1818 001118		

* WELLS MW-3 AND MWR-4D HAD FREE PRODUCT AND WERE NOT SAMPLED.

** COULD NOT OPEN WELL MW-21 TO TAKE A WELL DEPTH BECAUSE THE BOLT ON COVER WAS STRIPPED.

Well ID	GW Elevation
MW-2D	683.71
MW-13D	687.81
MW-14D	683.04
MW-20D	682.79
MW-21D	690.11
MWR-4D	686.38

* - RW-1 and RW-2 not used for construction of potentiometric map



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

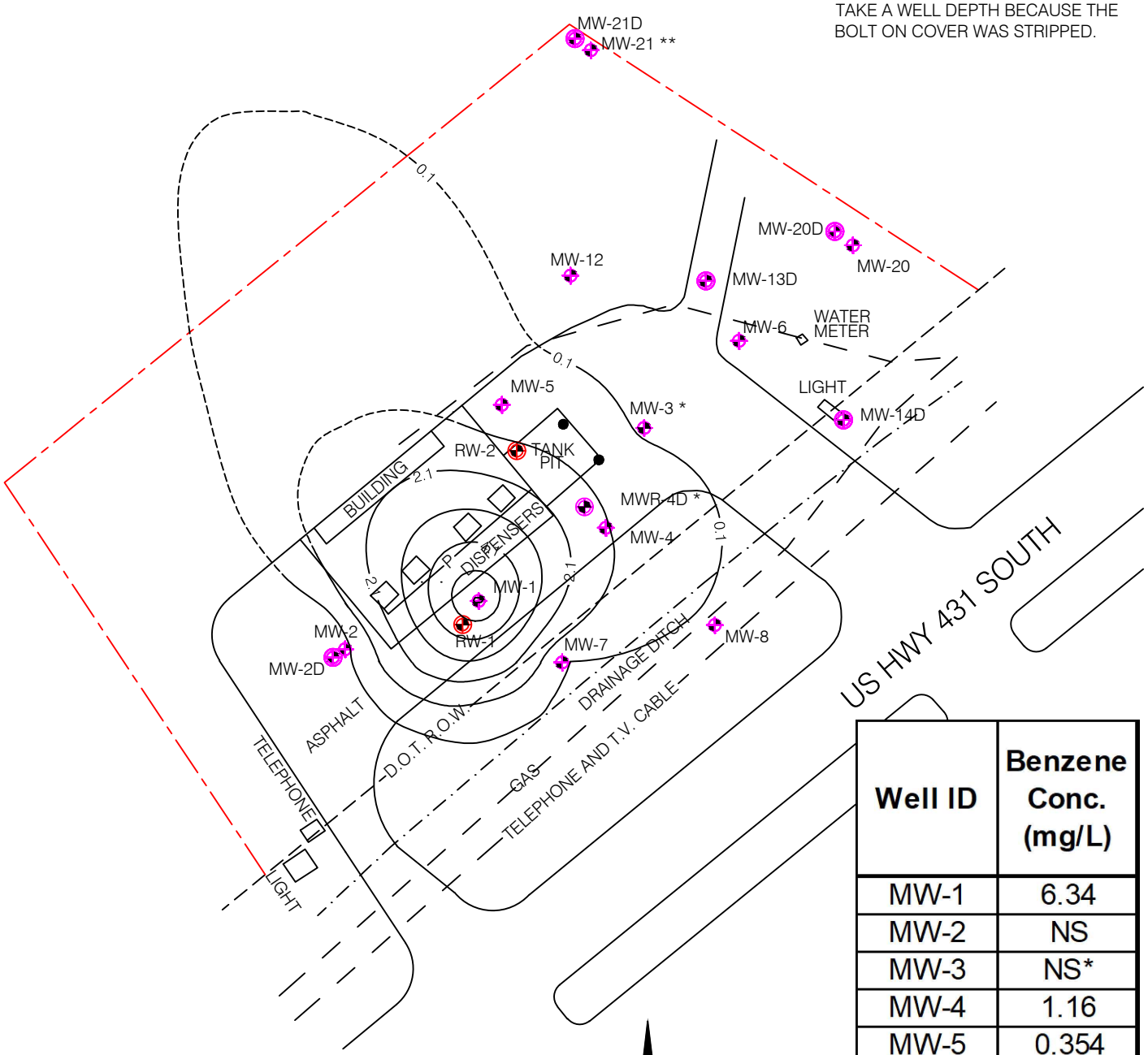
POTENTIOMETRIC SURFACE

FLOW DIRECTION (APPROXIMATE)

FIGURE No. 3	DEEP POTENTIOMETRIC SURFACE MAP 08-11-2022 PROJECT NO. 8521119, CP-61 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane Shalimar, FL 32579 850-609-1100 117 Gemini Circle, Ste. 416 Birmingham, AL 35209 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: DRAWN BY: JDP DATE: SEPTEMBER 2022 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. AL. FL. GA. ARCHITECT CA-0480 AA-C001551 001118 ENGINEER CA-78-E CA-1818 001118

* WELLS MW-3 AND MWR-4D HAD FREE PRODUCT AND WERE NOT SAMPLED.

** COULD NOT OPEN WELL MW-21 TO TAKE A WELL DEPTH BECAUSE THE BOLT ON COVER WAS STRIPPED.



LEGEND:

- MW-3 — SHALLOW MONITORING WELL
- MW-13D — DEEP MONITORING WELL
- RW-1 — RECOVERY WELL
- —1— ISOCONCENTRATION (mg/L) (BENZENE)

Well ID	Benzene Conc. (mg/L)
MW-1	6.34
MW-2	NS
MW-3	NS*
MW-4	1.16
MW-5	0.354
MW-6	NS
MW-7	0.070
MW-8	NS
MW-12	NS
MW-20	NS
MW-21	NS

FIGURE No. 4

SHALLOW BENZENE CONTOUR MAP
(08-11-2022)
PROJECT NO. 8521119, CP-61

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane, Shalimar, FL 32579, 850-609-1100
117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330
WWW.POLY-INC.COM

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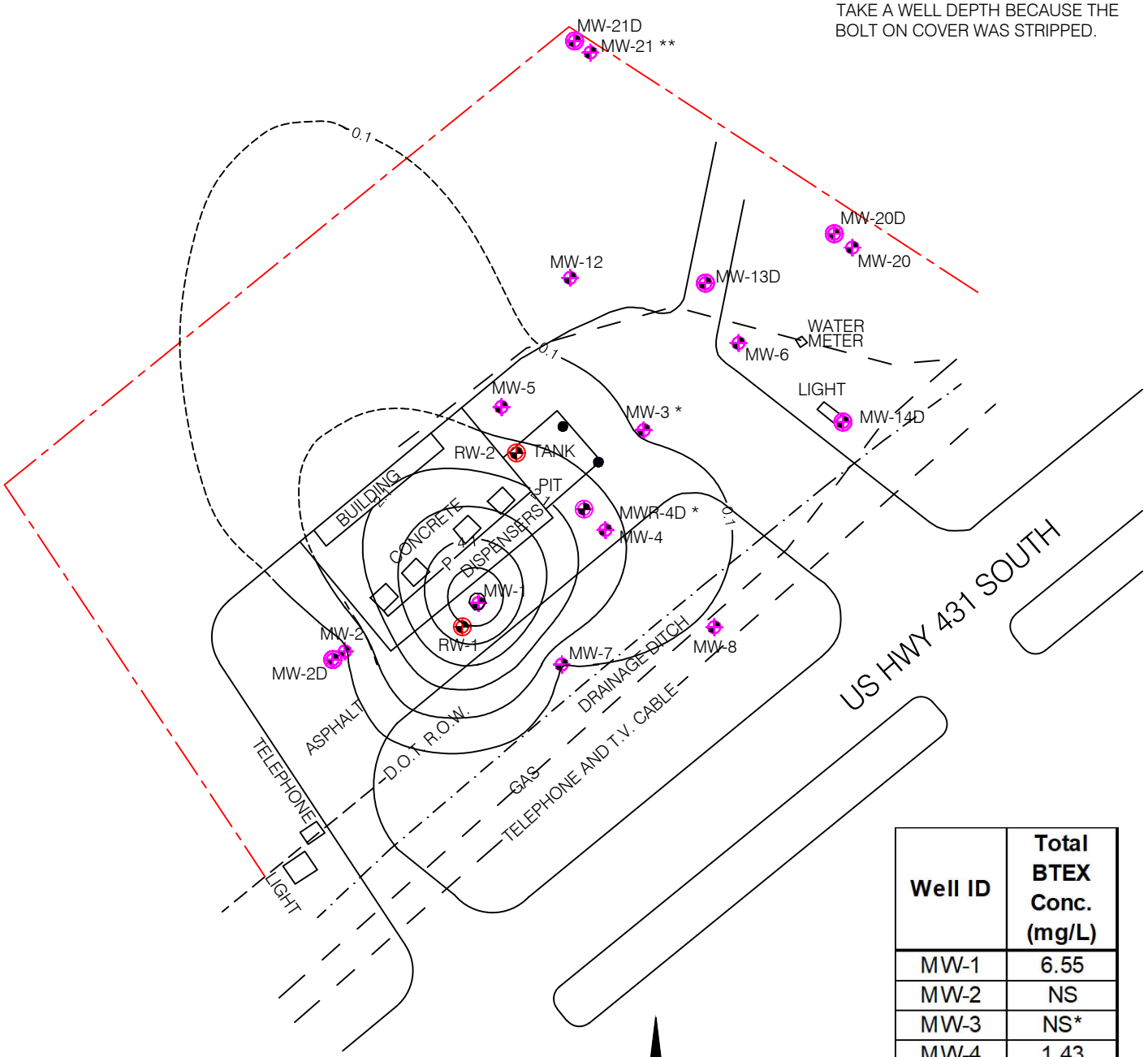
Cert. of Auth. No.	AL.	FL.	GA.	
ARCHIT ECT	CA-0480	AA-C001551	001118	
ENGINEER	CA-78-E	CA-1818	001118	

* WELLS MW-3 AND MWR-4D HAD FREE PRODUCT AND WERE NOT SAMPLED.

** COULD NOT OPEN WELL MW-21 TO TAKE A WELL DEPTH BECAUSE THE BOLT ON COVER WAS STRIPPED.



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

1 ISOCONCENTRATION (mg/L) (TOTAL BTEX)

Well ID	Total BTEX Conc. (mg/L)
MW-1	6.55
MW-2	NS
MW-3	NS*
MW-4	1.43
MW-5	0.380
MW-6	NS
MW-7	0.101
MW-8	NS
MW-12	NS
MW-20	NS
MW-21	NS

FIGURE No. 5

SHALLOW BTEX CONTOUR MAP (08-11-2022)

PROJECT NO. 8521119, CP-61

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane, Shalimar, FL 32579, 850-609-1100
117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330
WWW.POLY-INC.COM

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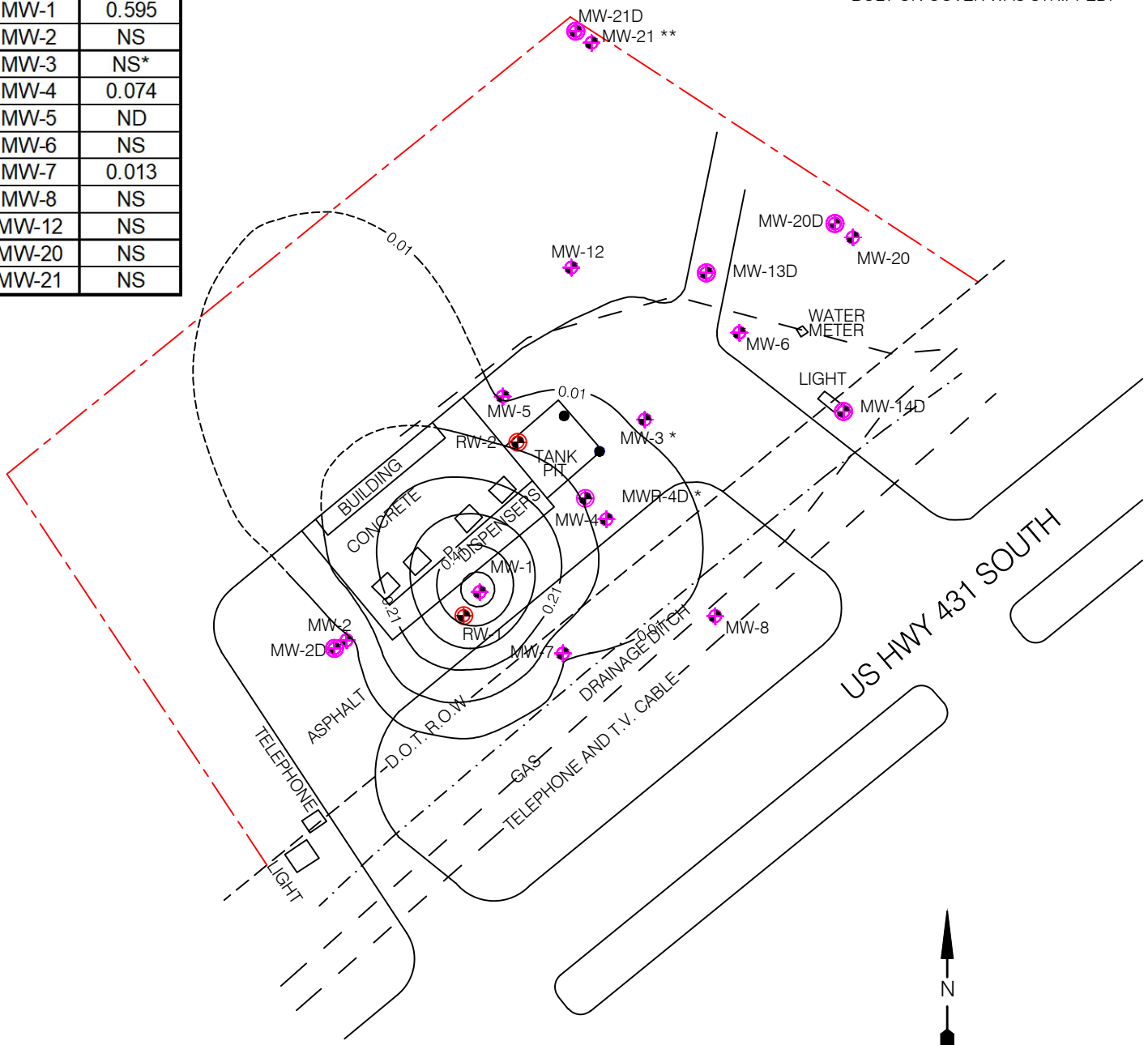
ENGINEER	CA-78-E	CA-1818	001118

Well ID	MTBE Conc. (mg/L)
MW-1	0.595
MW-2	NS
MW-3	NS*
MW-4	0.074
MW-5	ND
MW-6	NS
MW-7	0.013
MW-8	NS
MW-12	NS
MW-20	NS
MW-21	NS

* WELLS MW-3 AND MWR-4D HAD FREE PRODUCT AND WERE NOT SAMPLED.

** COULD NOT OPEN WELL MW-21 TO TAKE A WELL DEPTH BECAUSE THE BOLT ON COVER WAS STRIPPED.



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

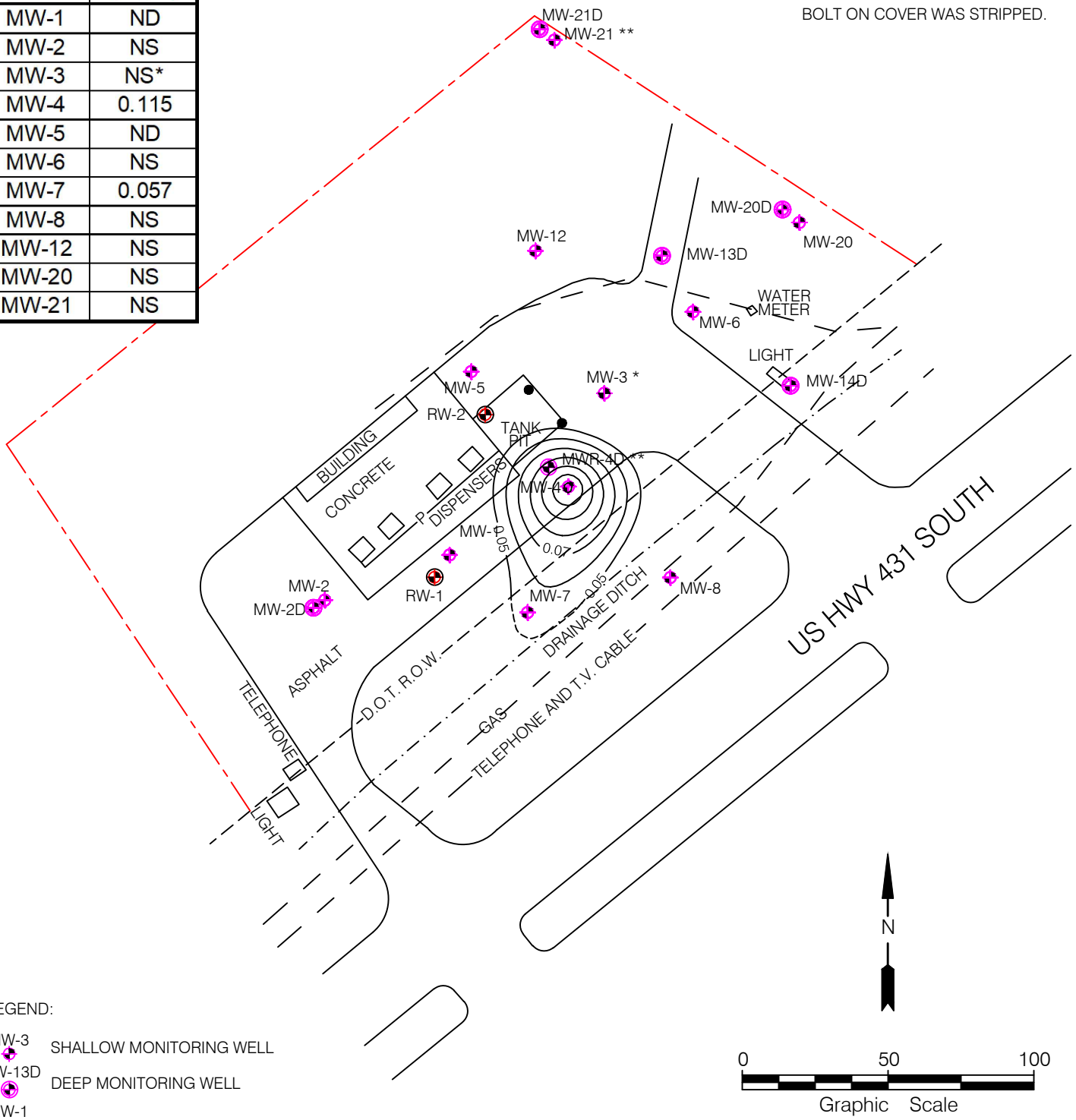
RW-1 RECOVERY WELL

FIGURE No.	SHALLOW MTBE CONTOUR MAP (08-11-2022) PROJECT NO. 8521119, CP-61	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane Shalimar, FL 32579 850-609-1100 117 Gemini Circle, Ste. 416 Birmingham, AL 35209 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY:	DRAWN BY: JDP	DATE: SEPTEMBER 2022
6	RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA		ENG / ARCH OF RECORD:		REGISTRATION No.
			Cert. of Auth. No.	AL. / FL. / GA.	These drawings are copyrighted and the property of Poly-Inc. Any use, partial or full reproduction is prohibited except by written Agreement with Poly-Inc.
			ARCHIT ECT	CA-0480 / AA-C001551 / 001118	
			ENGINEER	CA-78-E / CA-1818 / 001118	

Well ID	Naphthalene Conc. (mg/L)
MW-1	ND
MW-2	NS
MW-3	NS*
MW-4	0.115
MW-5	ND
MW-6	NS
MW-7	0.057
MW-8	NS
MW-12	NS
MW-20	NS
MW-21	NS

* WELLS MW-3 AND MWR-4D HAD FREE PRODUCT AND WERE NOT SAMPLED.

** COULD NOT OPEN WELL MW-21 TO TAKE A WELL DEPTH BECAUSE THE BOLT ON COVER WAS STRIPPED.



LEGEND:

MW-3 — SHALLOW MONITORING WELL

MW-13D — DEEP MONITORING WELL

RW-1 — RECOVERY WELL

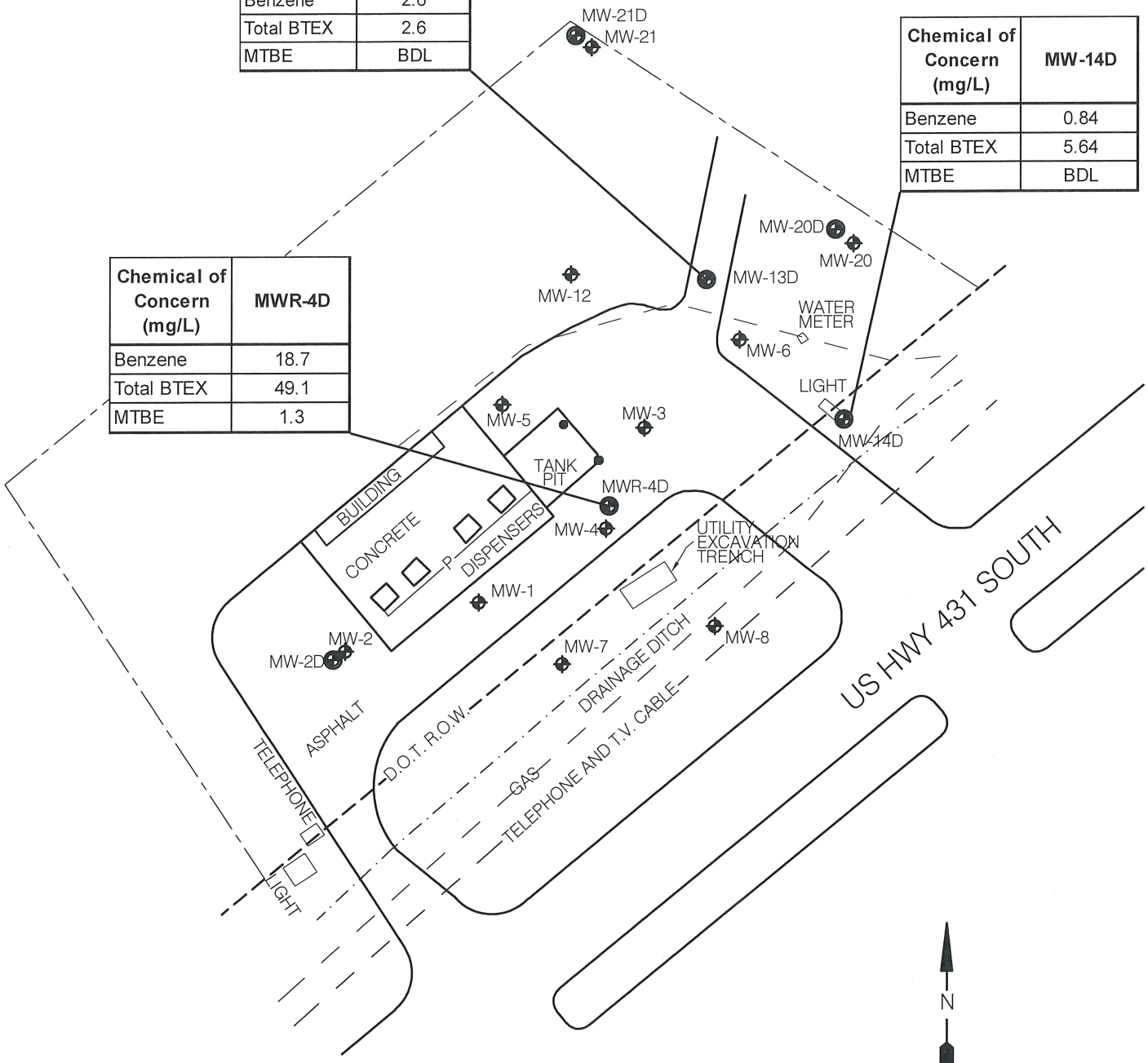
—1— ISOCONCENTRATION (mg/L) (TOTAL MTBE)

FIGURE No. 7	SHALLOW NAPHTHALENE CONTOUR MAP (08-11-2022) PROJECT NO. 8521119, CP-61 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: DRAWN BY: JDP DATE: SEPTEMBER 2022 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. AL. FL. GA. ARCHIT ECT CA-0480 AA-C001551 001118 ENGINEER CA-78-E CA-1818 001118 These drawings are copyrighted and the property of Poly-Inc. Any use, partial or full reproduction is prohibited except by written Agreement with Poly-Inc.	POLY

Chemical of Concern (mg/L)	MW-13D
Benzene	2.6
Total BTEX	2.6
MTBE	BDL

Chemical of Concern (mg/L)	MW-14D
Benzene	0.84
Total BTEX	5.64
MTBE	BDL

Chemical of Concern (mg/L)	MWR-4D
Benzene	18.7
Total BTEX	49.1
MTBE	1.3



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

FIGURE No. 7

DEEP COC CONCENTRATION MAP
(09-04-2019)
PROJECT NO. 7519045, CP-53

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane Shalimar, FL 32579 850-609-1100
2135 University Blvd. Ste. A Tuscaloosa, AL 35401 205-752-4037
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: JLM	DATE: SEPTEMBER 18, 2019
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118
SURVEY	CA-0018-LS	LB7527	LSF00132

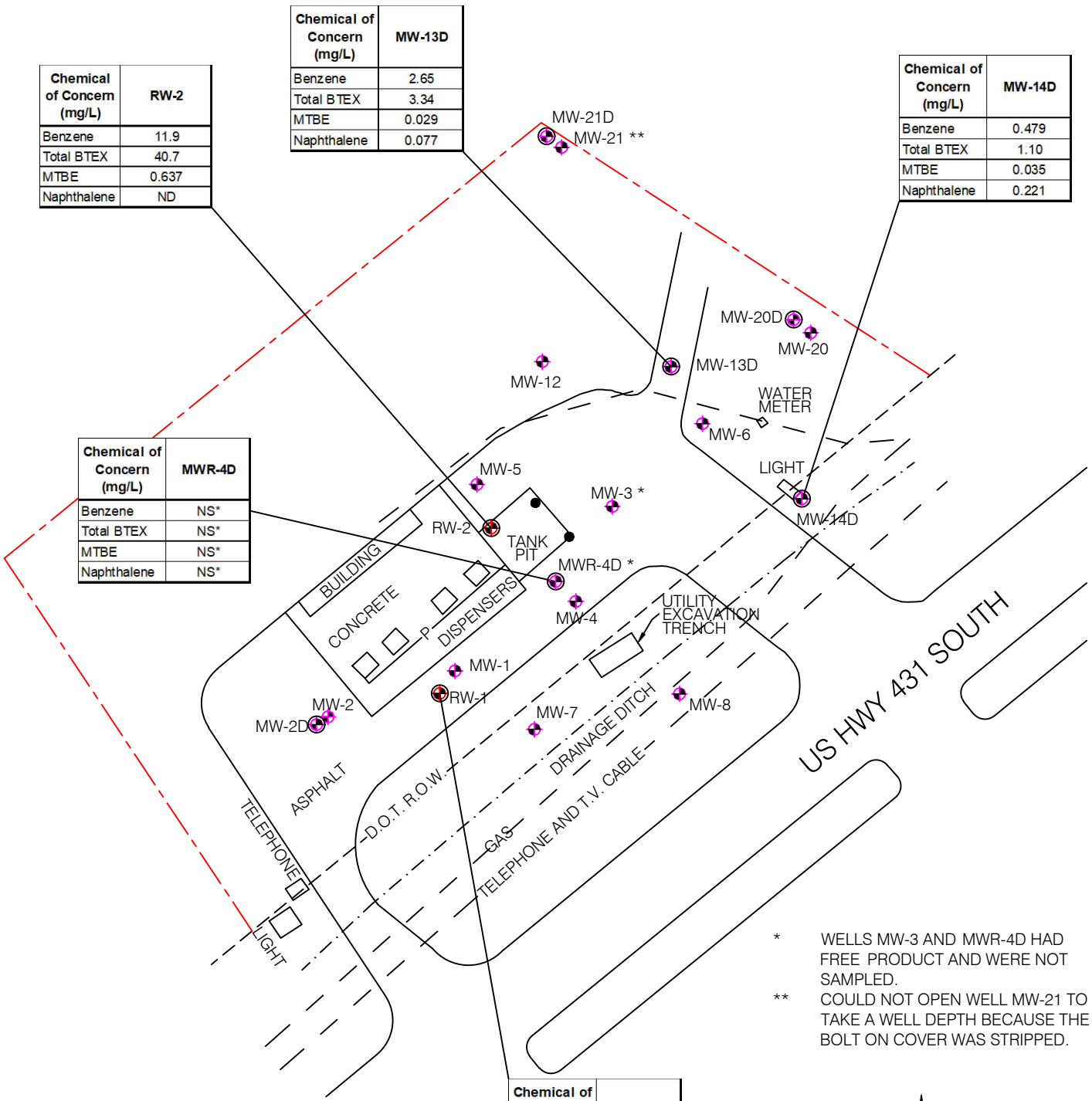
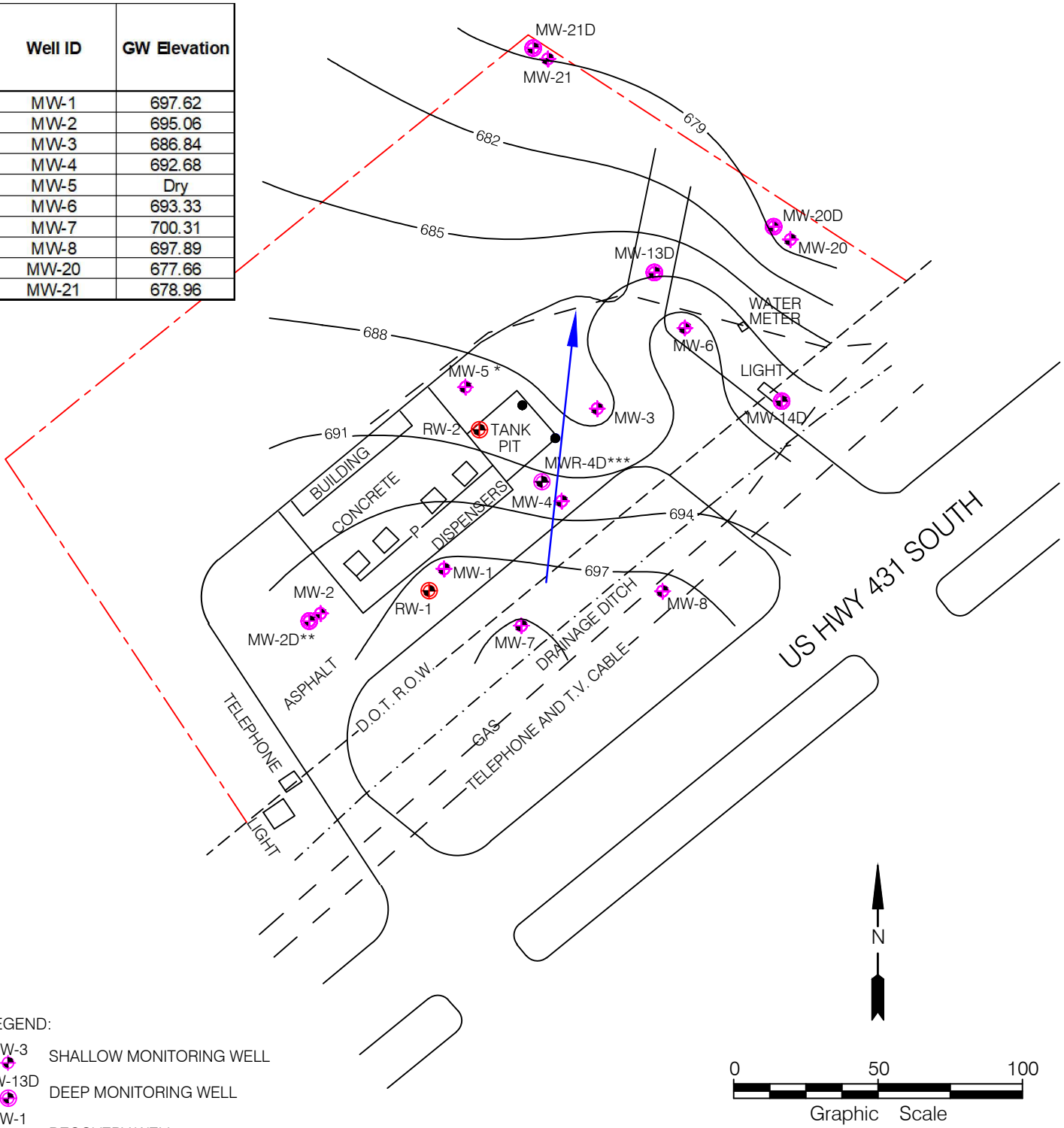


FIGURE No.	DEEP COC CONCENTRATION MAP (08-11-2022)	POLY, INC.	DESIGNED BY:	DRAWN BY:	DATE:
8	PROJECT NO. 8521119, CP-61	1935 Headland Avenue, Dothan, AL 36303, 334-793-4700		JDP	SEPTEMBER 2022
	RJ'S SERVICE STATION, HIGHWAY 431 SOUTH, GLENCOE, ALABAMA	102 Sunset Lane, Shalimar, FL 32579, 850-609-1100; 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330; WWW.POLY-INC.COM	ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHIT ECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118

* WELL DRY
** NOT ENOUGH SAMPLE VOLUME
*** FREE PRODUCT (1.92" THICK)

Well ID	GW Elevation
MW-1	697.62
MW-2	695.06
MW-3	686.84
MW-4	692.68
MW-5	Dry
MW-6	693.33
MW-7	700.31
MW-8	697.89
MW-20	677.66
MW-21	678.96



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

POTENTIOMETRIC SURFACE

FLOW DIRECTION (APPROXIMATE)

FIGURE No. 2

SHALLOW POTENTIOMETRIC SURFACE MAP (9-9-25)
PROJECT NO. 8524093, CP-69

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane Shalimar, FL 32579 850-609-1100
117 Gemini Circle, Ste. 416 Birmingham, AL 35209 205-913-0330
WWW.POLY-INC.COM

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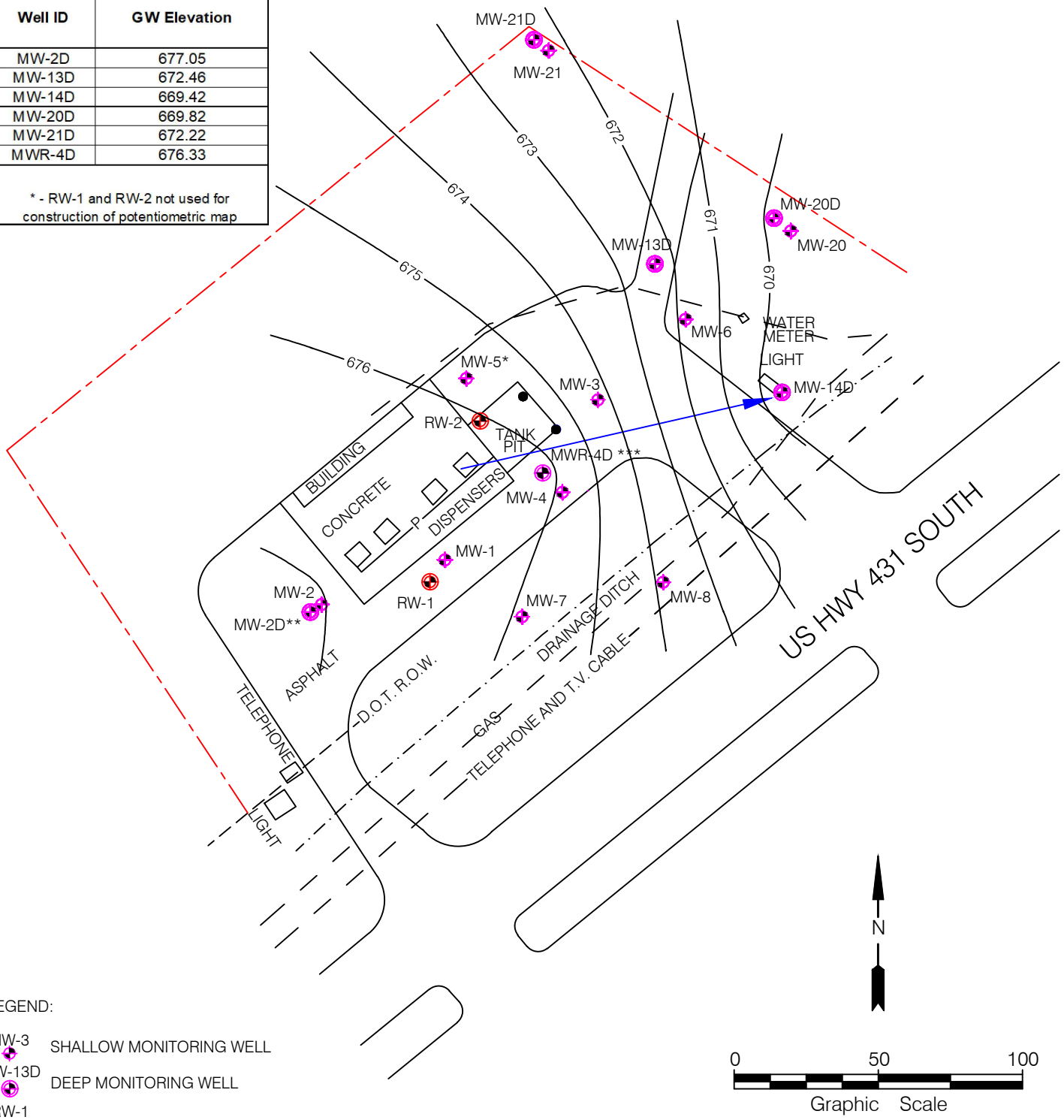
Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118

* WELL DRY
** NOT ENOUGH SAMPLE VOLUME
*** FREE PRODUCT (1.92" THICK)

Well ID	GW Elevation
MW-2D	677.05
MW-13D	672.46
MW-14D	669.42
MW-20D	669.82
MW-21D	672.22
MWR-4D	676.33

* - RW-1 and RW-2 not used for construction of potentiometric map



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

POTENTIOMETRIC SURFACE

FLOW DIRECTION (APPROXIMATE)

FIGURE No. 3

DEEP POTENTIOMETRIC SURFACE MAP (9-9-25)
PROJECT NO. 8524093, CP-69

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane, Shalimar, FL 32579, 850-609-1100
117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330
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DESIGNED BY:	DRAWN BY: GJK	DATE: OCTOBER 2025
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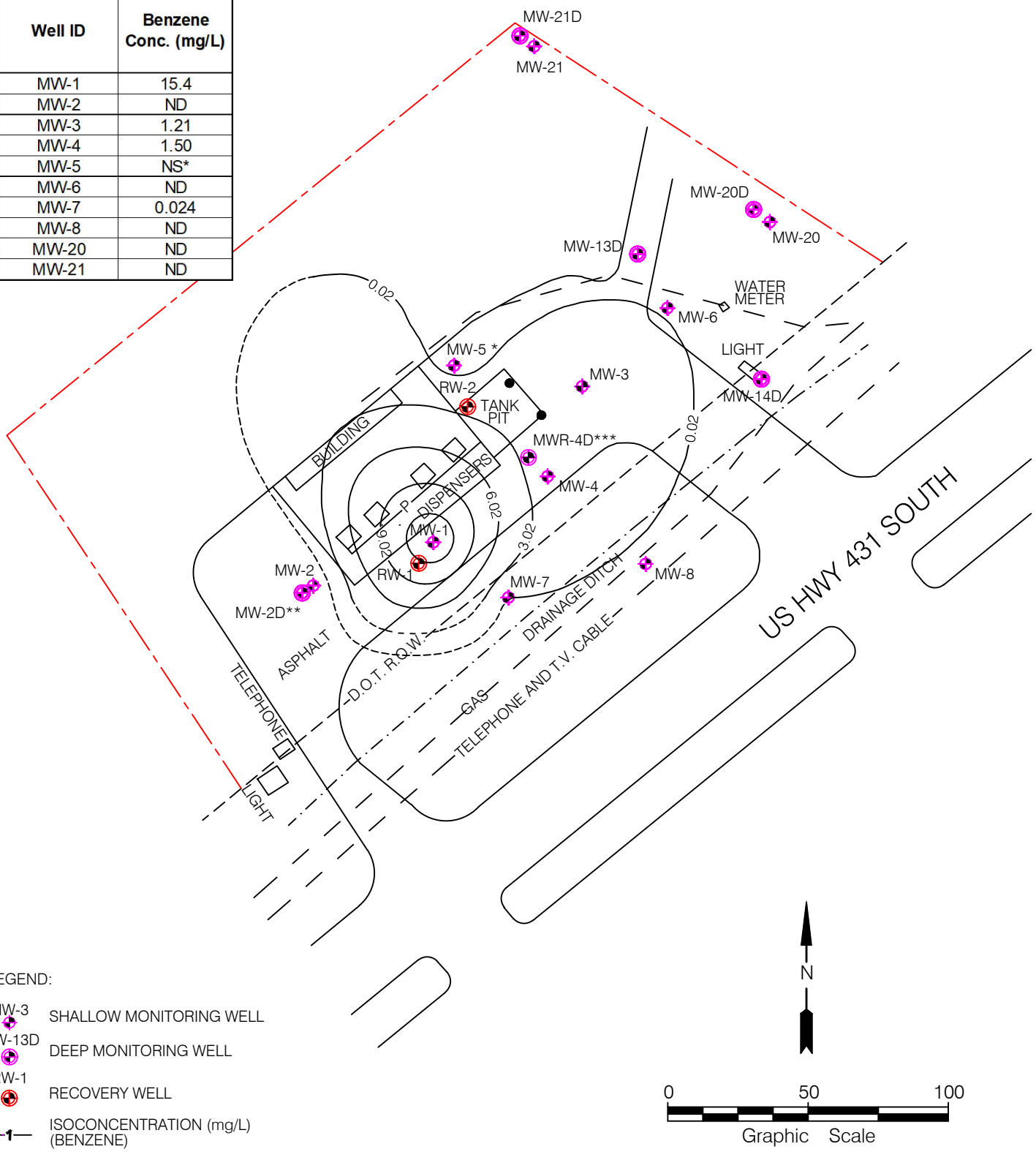
Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118

* WELL DRY
** NOT ENOUGH SAMPLE VOLUME
*** FREE PRODUCT (1.92" THICK)

Well ID	Benzene Conc. (mg/L)
MW-1	15.4
MW-2	ND
MW-3	1.21
MW-4	1.50
MW-5	NS*
MW-6	ND
MW-7	0.024
MW-8	ND
MW-20	ND
MW-21	ND



LEGEND:

MW-3 — SHALLOW MONITORING WELL

MW-13D — DEEP MONITORING WELL

RW-1 — RECOVERY WELL

—1— ISOCONCENTRATION (mg/L) (BENZENE)

FIGURE No. 4

SHALLOW BENZENE CONTOUR MAP (9-9-25)
PROJECT NO. 8524093, CP-69

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane, Shalimar, FL 32579, 850-609-1100
117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330
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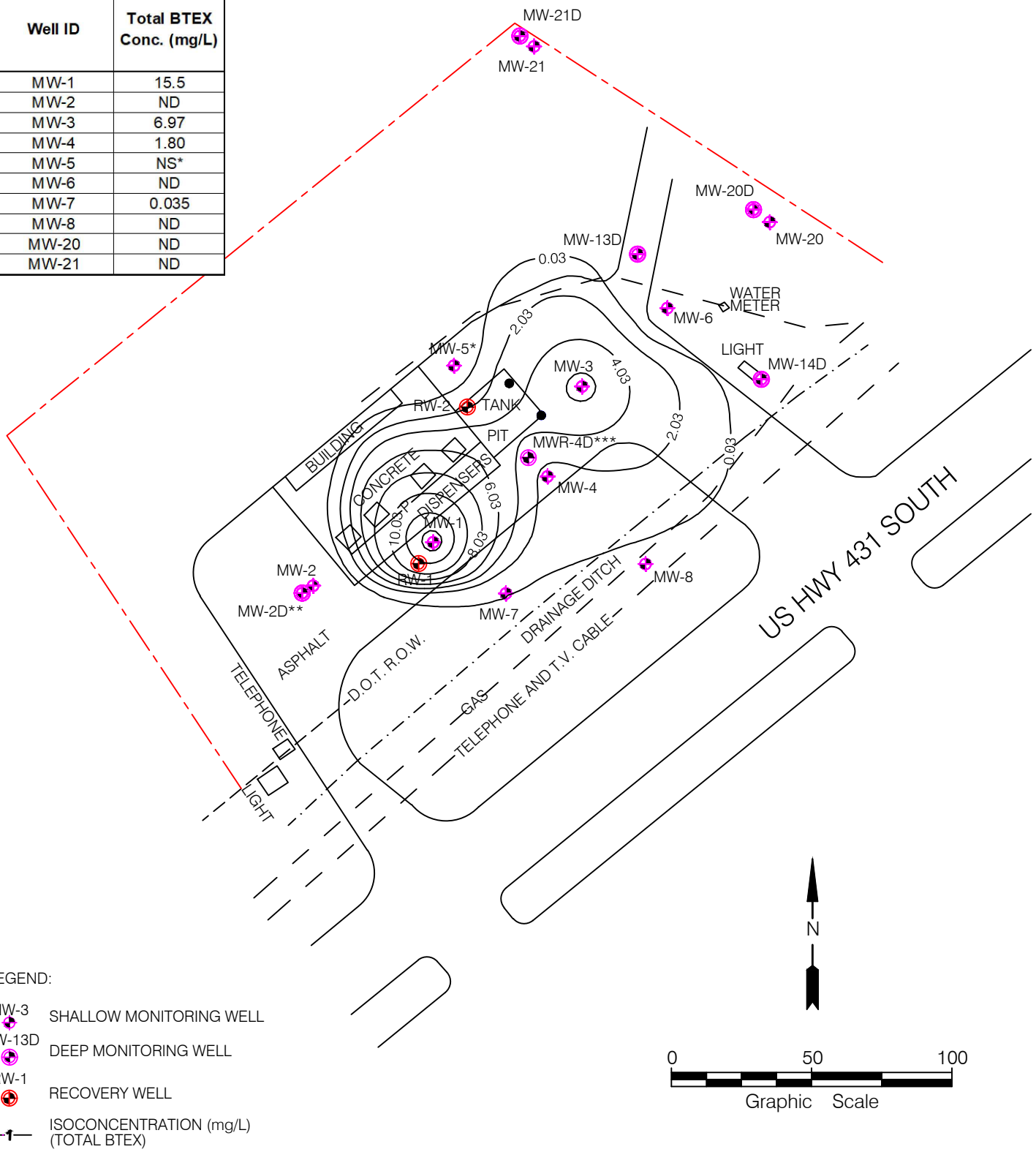
Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118

* WELL DRY
** NOT ENOUGH SAMPLE VOLUME
*** FREE PRODUCT (1.92" THICK)

Well ID	Total BTEX Conc. (mg/L)
MW-1	15.5
MW-2	ND
MW-3	6.97
MW-4	1.80
MW-5	NS*
MW-6	ND
MW-7	0.035
MW-8	ND
MW-20	ND
MW-21	ND



LEGEND:

MW-3 — SHALLOW MONITORING WELL

MW-13D — DEEP MONITORING WELL

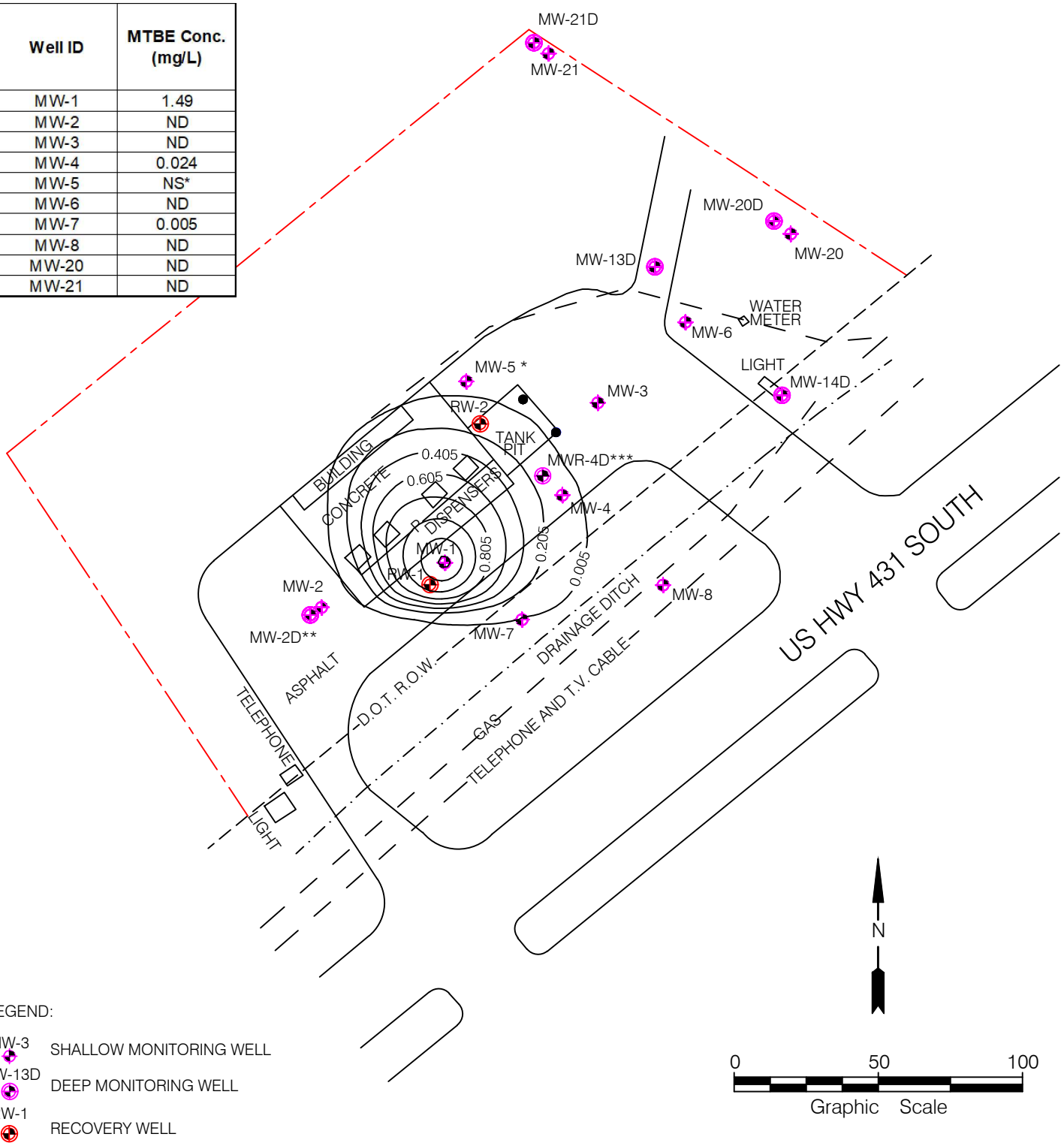
RW-1 — RECOVERY WELL

—1— ISOCONCENTRATION (mg/L) (TOTAL BTEX)

FIGURE No. 5	SHALLOW BTEX CONTOUR MAP (9-9-25) PROJECT NO. 8524093, CP-69 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: / DRAWN BY: GJK / DATE: OCTOBER 2025 ENG / ARCH OF RECORD: / REGISTRATION No. Cert. of Auth. No. (AL. / FL. / GA.) ARCHITECT CA-0480 / AA-C001551 / 001118 ENGINEER CA-78-E / CA-1818 / 001118 These drawings are copyrighted and the property of Poly-Inc. Any use, partial or full reproduction is prohibited except by written Agreement with Poly-Inc.	POLY

* WELL DRY
** NOT ENOUGH SAMPLE VOLUME
*** FREE PRODUCT (1.92" THICK)

Well ID	MTBE Conc. (mg/L)
MW-1	1.49
MW-2	ND
MW-3	ND
MW-4	0.024
MW-5	NS*
MW-6	ND
MW-7	0.005
MW-8	ND
MW-20	ND
MW-21	ND



LEGEND:

MW-3 — SHALLOW MONITORING WELL

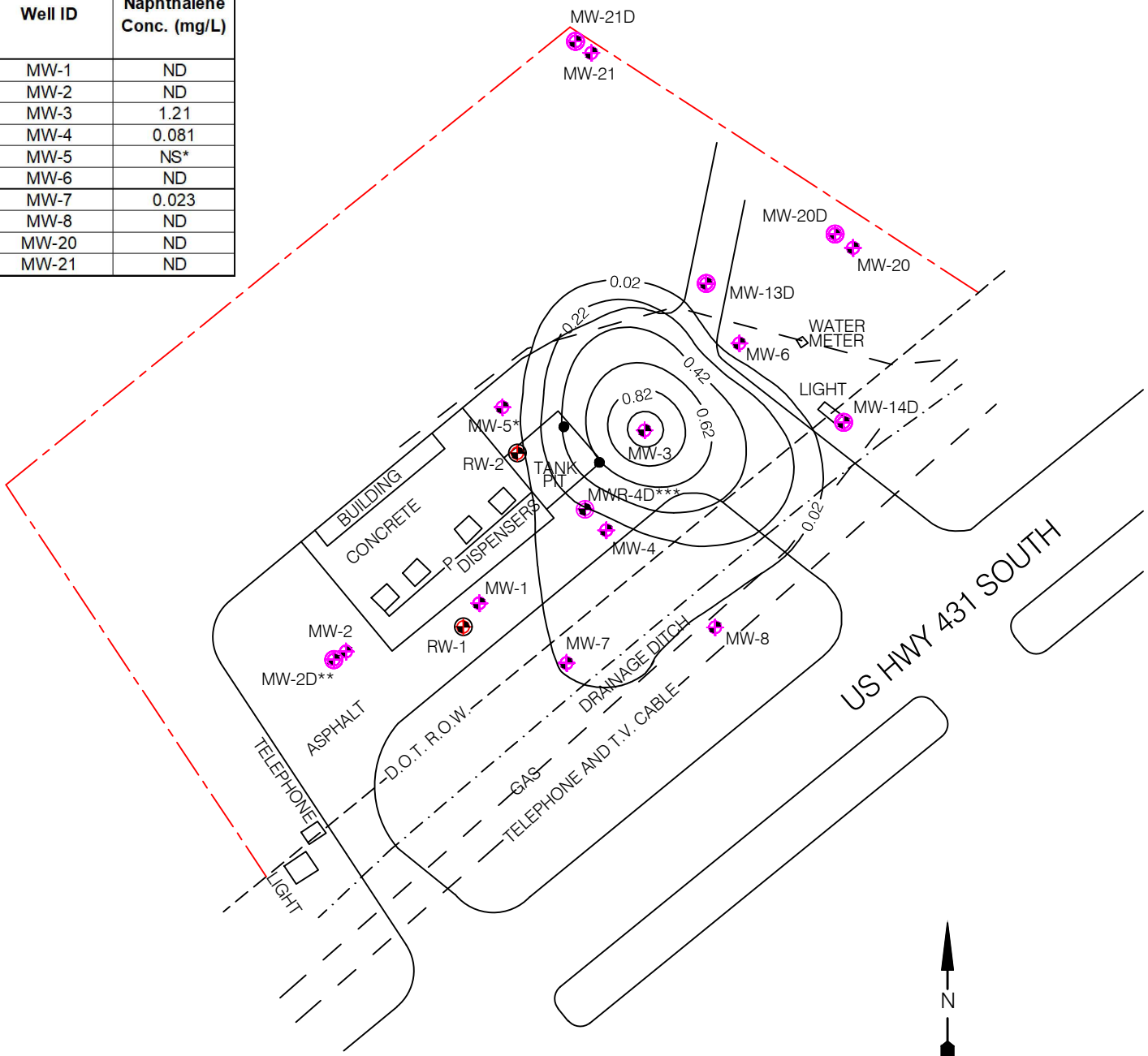
MW-13D — DEEP MONITORING WELL

RW-1 — RECOVERY WELL

FIGURE No. 6	SHALLOW MTBE CONTOUR MAP (9-9-25) PROJECT NO. 8524093, CP-69 RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: / DRAWN BY: GJK / DATE: OCTOBER 2025 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. (AL. / FL. / GA.) ARCHITECT CA-0480 AA-C001551 001118 ENGINEER CA-78-E CA-1818 001118 These drawings are copyrighted and the property of Poly-Inc. Any use, partial or full reproduction is prohibited except by written Agreement with Poly-Inc.	POLY

* WELL DRY
** NOT ENOUGH SAMPLE VOLUME
*** FREE PRODUCT (1.92" THICK)

Well ID	Naphthalene Conc. (mg/L)
MW-1	ND
MW-2	ND
MW-3	1.21
MW-4	0.081
MW-5	NS*
MW-6	ND
MW-7	0.023
MW-8	ND
MW-20	ND
MW-21	ND



LEGEND:

MW-3 SHALLOW MONITORING WELL

MW-13D DEEP MONITORING WELL

RW-1 RECOVERY WELL

—1— ISOCONCENTRATION (mg/L) (TOTAL MTBE)

FIGURE No. 7

SHALLOW NAPHTHALENE CONTOUR MAP (9-9-25)

PROJECT NO. 8524093, CP-69

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane Shalimar, FL 32579 850-609-1100
117 Gemini Circle, Ste. 416 Birmingham, AL 35209 205-913-0330
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: GJK	DATE: OCTOBER 2025
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118

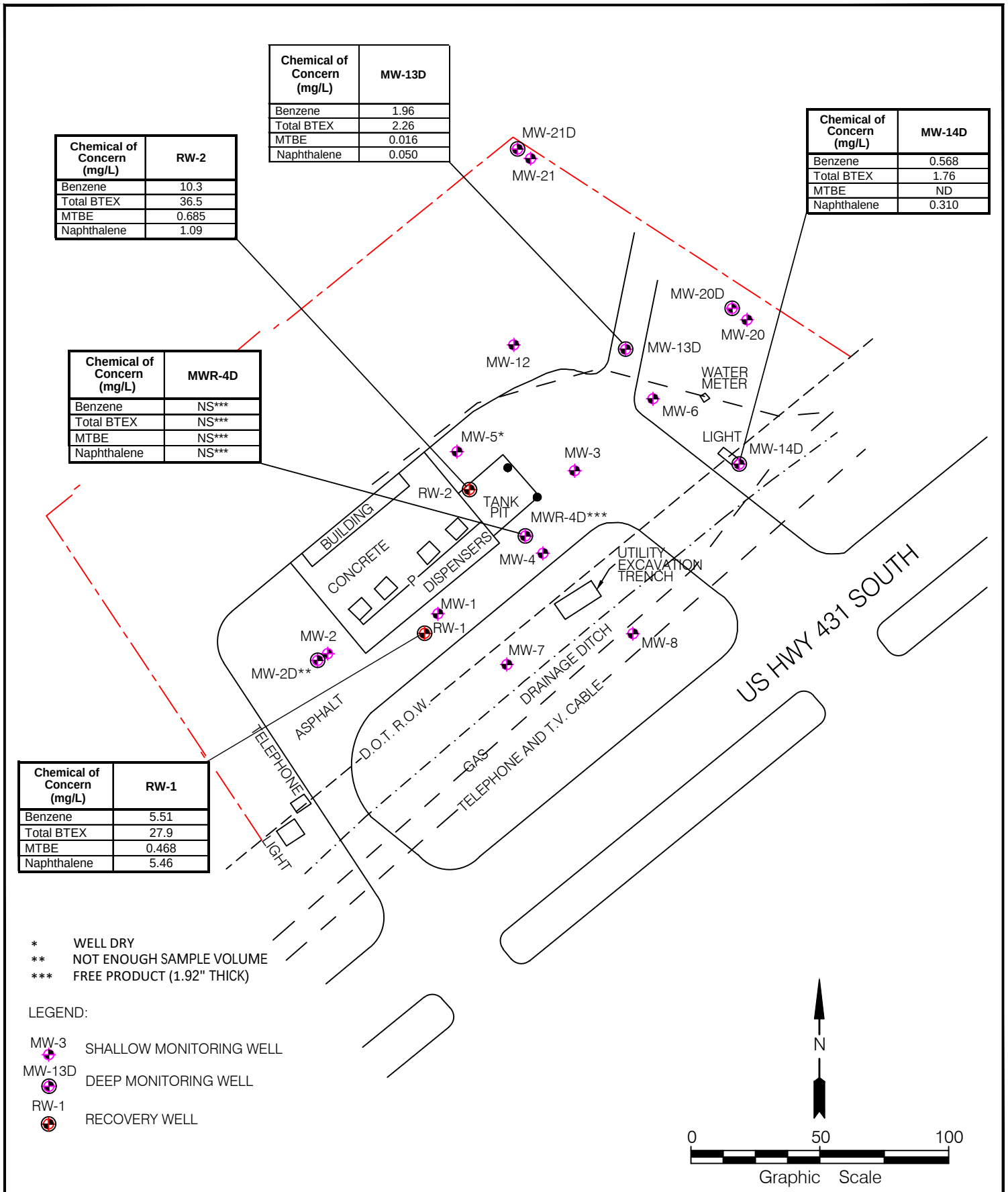


FIGURE No. 8

DEEP COC CONCENTRATION MAP (9-9-25)

PROJECT NO. 8524093, CP-69

RJ'S SERVICE STATION
HIGHWAY 431 SOUTH
GLENCOE, ALABAMA

POLY, INC.
1935 Headland Avenue
Dothan, AL 36303
334-793-4700
102 Sunset Lane 117 Gemini Circle, Ste. 416
Shalimar, FL 32579 Birmingham, AL 35209
850-609-1100 205-913-0330
WWW.POLY-INC.COM

DESIGNED BY:	DRAWN BY: GJK	DATE: OCTOBER 2025
ENG / ARCH OF RECORD:		REGISTRATION No.

Cert. of Auth. No.	AL.	FL.	GA.
ARCHITECT	CA-0480	AA-C001551	001118
ENGINEER	CA-78-E	CA-1818	001118

APPENDIX C

MEME Reports

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Birmingham, AL 35210

Phone: (205) 467-0319
Fax: (205) 467-0987

November 23, 2020

Mr. Darral Kirby
Poly, Inc.
223 Aquarius Drive, Suite 116
Birmingham, AL 35209

RE: 8-Hour High Vacuum Extraction Event #2
RJ's Service Station
16051 U.S. Highway 431
Glencoe, AL
MEG Project No. AL24200062

Dear Mr. Kirby:

Miller Environmental Group, Inc. (MEG) is pleased to provide this summary of the High Vacuum Extraction (HVE) event conducted on November 16, 2020, at the referenced location above. Below is a summary of the technology, as well as the results of the actual event.

Technology

HVE involves the extraction of subsurface vapors and liquids via a monitoring well or recovery well. This is accomplished by applying high levels of vacuum to the extraction point. To eliminate mounding of the water table, a drop tube is inserted in the well to the static water level depth. The applied vacuum and airflow extracted from the well is pulled through this drop tube. As the water table attempts to mound due to the application of vacuum, the liquids are "slurped" through the drop tube. This slurping effectively maintains the static conditions of the water table while the elevated vacuum is applied to the well during the event. The slurping process also helps liberate contaminants from the smear zone as a result of capillary pressure. In order to minimize any change to the current smear zone associated with the site, seasonal water level is analyzed. Once the extraction process is underway, the inlet of the drop tube assembly is slowly lowered to a predetermined depth. Theoretically the drop tube can be lowered to the maximum historical water level observed for each extraction well. This drawdown below the static water level depresses the water table and creates a cone of influence, which maximizes the efficiency of the high vacuum process.

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Occasionally, fresh air is introduced at the well surface to increase the airflow and enhance the liquid removal rate. To accurately record the actual removal rate from the well, an airflow gauge is mounted on the well head to measure the amount of fresh air that is introduced. This extra fresh air is subtracted from the total flow calculated for each extraction well. Additionally, a set of two vacuum gauges are installed on the well head assembly; one on the drop tube assembly (well head vacuum), and one on the well casing (influence vacuum). If fresh air is introduced at the well head, the influence vacuum reading will be artificially lower than the actual applied vacuum because the inlet for fresh air is adjacent to this vacuum gauge port.

During the extraction process, the combined air and liquids are transferred to a 3,000-gallon capacity vacuum truck via a manifold mounted on the portable thermal oxidation treatment system where the liquids are separated using the vacuum truck as the knockout tank. The hydrocarbon vapors are transferred to the off-gas thermal oxidation system (when necessary to meet air discharge requirements) and are incinerated in the ThermOx® unit at 1,400-1,500°Fahrenheit (F). After thorough destruction of the contaminants in the air stream, the clean air is discharged into the atmosphere.

Calculations

During the HVE event, measurements are collected of both the influent and effluent flow rates, the concentrations of the vapors removed (before off-gas treatment), and the off-gas treatment system concentrations. These measurements are used to calculate the removal rates and the off-gas emission rates. These flow rates are measured using a pitot tube-type flow meter. Before each event, these flow assemblies are calibrated to ensure an accurate flow measurement. A separate flow rate is calculated for each influent well (if more than one well is connected), as well as for any additional fresh air that is introduced into the influent stream. These individual flow rates are combined to achieve the total flow and velocity derived from the extraction points. Because of the extremely high concentrations involved with an HVE event, additional quench air may be added to the vapor stream, just before entering the ThermOx® unit. An additional pitot tube assembly is installed at the inlet of the ThermOx® unit and is used to measure the total flow. Combined with the off-gas concentration readings, this total flow rate is used to calculate the destruction efficiency of the system.

Results

Prior to the commencement of the HVE event, an oil/water interface probe was used to measure the depth to product (if present) and depth to water in wells MWR-4D, RW-1, and RW-2. Separate phase hydrocarbons (“free product”) were detected in MWR-4D at a thickness of 0.02 foot prior to performing the HVE event. Once static water levels were established, the system was connected to MWR-4D, RW-1, and RW-2. At each extraction point, a drop tube was positioned at the static fluid level, and once the ThermOx® unit reached its required operating temperature (1,400-1,500°F), the inlet flow valve was opened for the wells. During the HVE event at 16051 U.S. Highway 431, vacuum was applied to MWR-4D at 0800 hours, RW-2 at

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0805 hours, and RW-1 at 0810 hours. The drop tube assembly was lowered to approximately 40 feet below the top of casing (BTOC) at MWR-4D, and approximately 45 feet BTOC at RW-1 and RW-2, creating a cone of influence in the subsurface around the wells. Air flow readings from the extraction points are presented on **Table 1** and shown on **Chart 1**.

During this event, 5.69 pounds of hydrocarbons were removed via vapor phase (equivalent to 0.92 gallons of gasoline), which brings the cumulative total for 2 events to 96.64 pounds of hydrocarbons removed (equivalent to 15.68 gallons of gasoline). A summary of the total hydrocarbon recovery rate is included on **Table 1**. Throughout the event, air concentration measurements were recorded periodically from both the influent and effluent sample ports. The measurements were recorded and compiled into the HVE field monitoring log, and additional calculations were made to determine the hydrocarbon loading rate. The total off-gas discharge (to the atmosphere) was 0.0 pounds of hydrocarbons, thus yielding an average 100% destruction rate by the ThermOx® unit.

Once the HVE event was complete, a second round of water level measurements was recorded. All wells connected to the system showed a change in water levels, with noticeable water table drawdown readings. During this event, 430 gallons of gas/water mixture were removed and retained in the vacuum truck tank. The gas/water mixture was transported by MEG to Sunoco LLC in Birmingham, AL for recycling. A copy of the Bill of Lading is attached.

Thank you for the opportunity to provide our services. If you have questions, please feel free to contact me at 205-467-0319.

Sincerely,

MILLER ENVIRONMENTAL GROUP, INC.

Nathan Burttram
Project Manager
Southeast Region

Enclosures: Table 1 – HVE Field Monitoring Data
Chart 1 – Recovery Flow Rates
Bill of Lading

Tables

MILLER ENVIRONMENTAL GROUP INC.

TABLE 1 - MEG HVE MONITORING DATA

Date:	November 16, 2020	Site Name:	RJ's Service Station	MEG Job #:	AL24200062	MEG Personnel	PID or FID make/model
Event #:	2	Site Address:	16051 U.S. Highway 431, Glencoe, AL	Consultant:	Poly, Inc.	Minshew/Anglin	MiniRAE 3000

SYSTEM #2

Time of Day	Interval of Time (minutes)	Vac Truck Applied Vac (in. Hg)	Applied Vacuum, Well Head Flow, and Bleed Air at Extraction Well(s)									Dilution Air Magnehelic			Process Air Stream Magnehelic			Total Flow Transmitter Magnehelic			Combined Air Influent PID (ppm)	Total Hydrocarbon Loading Rate (lbs/hr)	Total Hydrocarbons Removed (gal)	Total Hydrocarbon Removed (lbs)	Cumulative Total Hydrocarbons Removed (lbs)	ThermOx Temp (ºF)	Digital Flow Recorder (scfm)	Effluent PID (ppm)	Destruction Efficiency (%)	Hydrocarbon Emission Rate (lbs/hr)	Total Hydrocarbons Discharged (lbs)	Cumulative Total Hydrocarbons Discharged (lbs)
			on at 0800			on at 0805			on at 0810																							
			MWR-4D			RW-2			RW-1																							
			in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)											
			(Recovery Flow Rates presented on Chart 1)																												
0800		18	16	501	5	--	--	--	--	--	--	0.2	1800	158	0.1	1300	114	0.7	3350	295	151	0.75	--	--	--	1431	295	0	100.0	0.00	0.000	0.000
0815	15	18	14	159.4	5	15	170.8	5	15	171	5	0.2	1800	158	0.1	1300	114	0.7	3350	295	103	0.51	0.02	0.13	0.13	1429	295	0	100.0	0.00	0.000	0.000
0830	15	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	70	0.29	0.01	0.07	0.20	1429	246	0	100.0	0.00	0.000	0.000
0845	15	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	197	0.82	0.03	0.20	0.41	1436	246	0	100.0	0.00	0.000	0.000
0900	15	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	193	0.80	0.03	0.20	0.61	1435	246	0	100.0	0.00	0.000	0.000
0930	30	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	126	0.52	0.04	0.26	0.87	1434	246	0	100.0	0.00	0.000	0.000
1000	30	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	103	0.43	0.03	0.21	1.08	1436	246	0	100.0	0.00	0.000	0.000
1030	30	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	146	0.61	0.05	0.30	1.38	1436	246	0	100.0	0.00	0.000	0.000
1100	30	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	168	0.70	0.06	0.35	1.73	1437	246	0	100.0	0.00	0.000	0.000
1200	60	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	215	0.89	0.14	0.89	2.63	1436	246	0	100.0	0.00	0.000	0.000
1300	60	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	186	0.77	0.13	0.77	3.40	1436	246	0	100.0	0.00	0.000	0.000
1400	60	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	178	0.74	0.12	0.74	4.14	1434	246	0	100.0	0.00	0.000	0.000
1500	60	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	180	0.75	0.12	0.75	4.89	1436	246	0	100.0	0.00	0.000	0.000
1600	60	18	14	159.4	5	15	170.8	5	15	171	5	0.0	0	0	0.1	1300	114	0.5	2800	246	194	0.81	0.13	0.81	5.69	1436	246	0	100.0	0.00	0.000	0.000
				184 avg			171 avg			171 avg							114 avg						0.92 Total				253 avg		100.0 avg			

Comments
0800: MWR-4D online; drop tube set at 40 feet below top of casing (BTOC).
0805: RW-2 online; drop tube set at 45 feet BTOC.
0810: RW-1 online; drop tube set at 45 feet BTOC.
1630: End of HVE event.

Monitoring Well Gauging Data

Well Number	Before Event			Influence Vacuum (in. H_2O)	After Event			Water Level Change
	DTP	DTW	Prod. (ft)		DTP	DTW	Prod. (ft)	
MWR-4D	22.99	23.01	0.02		--	40.38	--	-17.37
RW-2	--	28.77	--		--	45.24	--	-16.47
RW-1	--	28.91	--		--	45.62	--	-16.71

This Event's Totals

Total Pounds of Hydrocarbon Removed This Event	5.69
Equivalent Gallons of Hydrocarbons Removed This Event	0.92
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	430
Gallons of Separate Phase Product in Vac Truck Tank at End of Event	0
Total Operating Time (Hours)	8

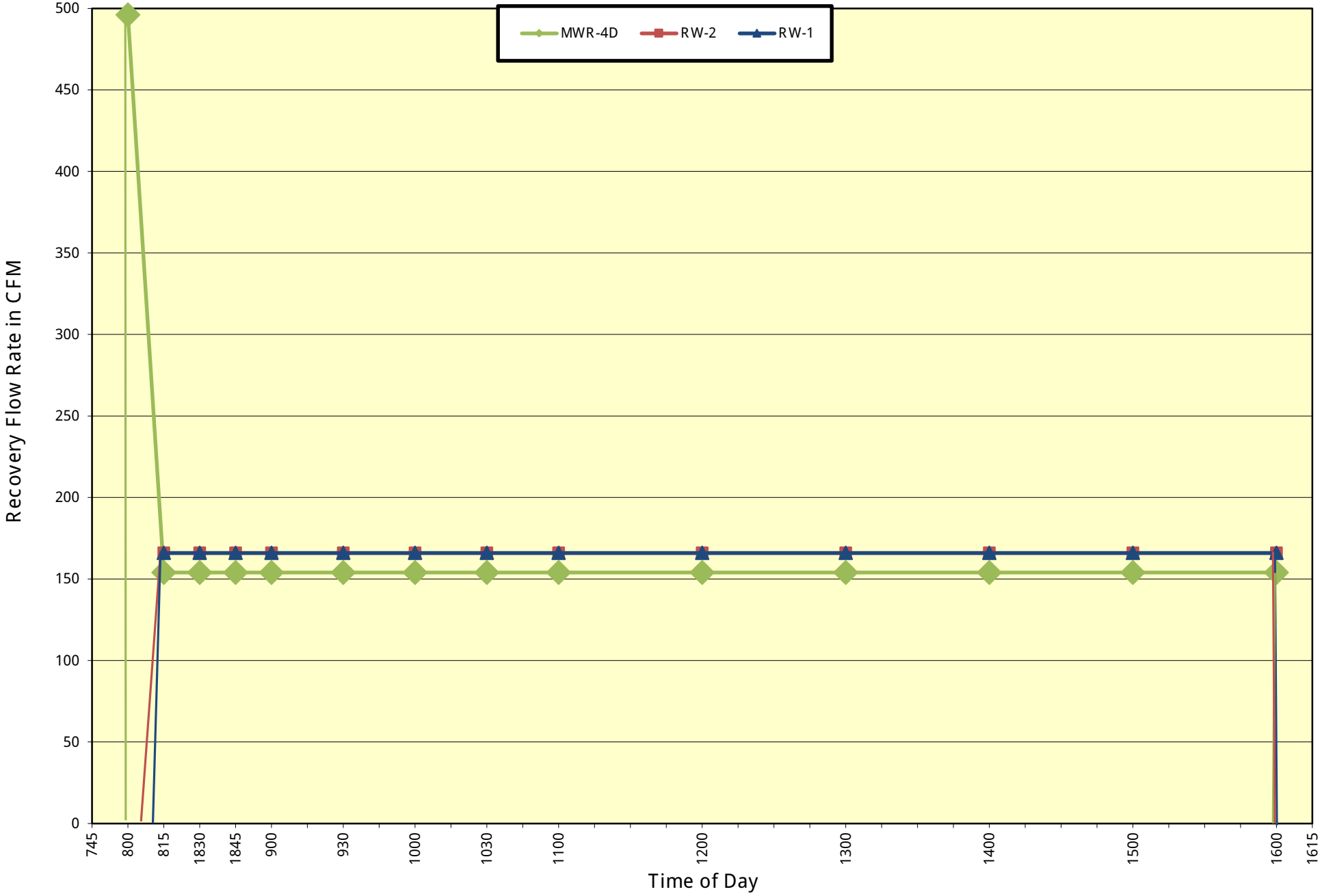
Cumulative (to date) Totals (2 events)

Total Pounds of Hydrocarbons Removed	96.64
Equivalent Gallons of Hydrocarbons Removed	15.68
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	471

Charts

MILLER ENVIRONMENTAL GROUP INC.

Chart 1: Well Head Flow Rates
HVE Event 2: RJ 's Service Station, Glencoe, AL
Performed by MEG on November 16, 2020



Shipping Documents

MILLER ENVIRONMENTAL GROUP INC.

Please print or type

BILL OF LADING

Generator EPA ID #

1. Document No. BIR5718

2. Page 1 of 1

3. Generator's Name and Mailing Address
Greg Johnson
P.O. Box 1551
Gadsden, AL 35902
205-752-4037

4. Generator's Phone ( )

Site Address
Rd's Service Station
16051 U.S. Highway 431 South
Glencoe, Alabama 35905

5. Transporter 1 Company Name: Miller Environmental Group, Inc.

6. EPA ID # NYD986908085

A. State Transporter's ID

B. Transporter 1 Phone

7. Transporter 2 Company Name

8. EPA ID #

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address
Sunoco, LLC
2700 Ishkooda-Wenonah Road
Birmingham, Alabama 35211
205-925-6600
HM

10. EPA ID # ALD000827022

E. State Facility's ID

F. Facility's Phone

	11. Shipping Name	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a.	NON-RCRA, NON-DOT, LIQUID, N.O.S. (PETROLEUM CONTACT WATER)		TT	430	G
b.					
c.					
d.					

GENERATOR

G. Additional Descriptions for Materials Listed Above

15. Special Handling Instructions and Additional Information
Job # AL24200062
P.O. # 6000T
No Approval Number Required

16. GENERATOR'S CERTIFICATION: I hereby certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. The materials described on this document are not subject to federal uniform hazardous waste manifest requirements.

Printed/Typed Name	Signature	Date (Month / Day / Year)
Jeremy McDonald		11 / 16 / 20

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month / Day / Year)
Bradley Anglin	Bradley Anglin	11 / 16 / 20

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month / Day / Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the materials covered by this bill of lading except as noted in item 19.

Printed/Typed Name	Signature	Date (Month / Day / Year)
Brenda McG		11 / 16 / 2020

R17326

BILL OF LADING

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Birmingham, AL 35210

Phone: (205) 467-0319
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December 23, 2020

Mr. Darral Kirby
Poly, Inc.
223 Aquarius Drive, Suite 116
Birmingham, AL 35209

RE: 8-Hour High Vacuum Extraction Event #3
RJ's Service Station
16051 U.S. Highway 431
Glencoe, AL
MEG Project No. AL24200062

Dear Mr. Kirby:

Miller Environmental Group, Inc. (MEG) is pleased to provide this summary of the High Vacuum Extraction (HVE) event conducted on December 11, 2020, at the referenced location above. Below is a summary of the technology, as well as the results of the actual event.

Technology

HVE involves the extraction of subsurface vapors and liquids via a monitoring well or recovery well. This is accomplished by applying high levels of vacuum to the extraction point. To eliminate mounding of the water table, a drop tube is inserted in the well to the static water level depth. The applied vacuum and airflow extracted from the well is pulled through this drop tube. As the water table attempts to mound due to the application of vacuum, the liquids are "slurped" through the drop tube. This slurping effectively maintains the static conditions of the water table while the elevated vacuum is applied to the well during the event. The slurping process also helps liberate contaminants from the smear zone as a result of capillary pressure. In order to minimize any change to the current smear zone associated with the site, seasonal water level is analyzed. Once the extraction process is underway, the inlet of the drop tube assembly is slowly lowered to a predetermined depth. Theoretically the drop tube can be lowered to the maximum historical water level observed for each extraction well. This drawdown below the static water level depresses the water table and creates a cone of influence, which maximizes the efficiency of the high vacuum process.

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Occasionally, fresh air is introduced at the well surface to increase the airflow and enhance the liquid removal rate. To accurately record the actual removal rate from the well, an airflow gauge is mounted on the well head to measure the amount of fresh air that is introduced. This extra fresh air is subtracted from the total flow calculated for each extraction well. Additionally, a set of two vacuum gauges are installed on the well head assembly; one on the drop tube assembly (well head vacuum), and one on the well casing (influence vacuum). If fresh air is introduced at the well head, the influence vacuum reading will be artificially lower than the actual applied vacuum because the inlet for fresh air is adjacent to this vacuum gauge port.

During the extraction process, the combined air and liquids are transferred to a 3,000-gallon capacity vacuum truck via a manifold mounted on the portable thermal oxidation treatment system where the liquids are separated using the vacuum truck as the knockout tank. The hydrocarbon vapors are transferred to the off-gas thermal oxidation system (when necessary to meet air discharge requirements) and are incinerated in the ThermOx® unit at 1,400-1,500°Fahrenheit (F). After thorough destruction of the contaminants in the air stream, the clean air is discharged into the atmosphere.

Calculations

During the HVE event, measurements are collected of both the influent and effluent flow rates, the concentrations of the vapors removed (before off-gas treatment), and the off-gas treatment system concentrations. These measurements are used to calculate the removal rates and the off-gas emission rates. These flow rates are measured using a pitot tube-type flow meter. Before each event, these flow assemblies are calibrated to ensure an accurate flow measurement. A separate flow rate is calculated for each influent well (if more than one well is connected), as well as for any additional fresh air that is introduced into the influent stream. These individual flow rates are combined to achieve the total flow and velocity derived from the extraction points. Because of the extremely high concentrations involved with an HVE event, additional quench air may be added to the vapor stream, just before entering the ThermOx® unit. An additional pitot tube assembly is installed at the inlet of the ThermOx® unit and is used to measure the total flow. Combined with the off-gas concentration readings, this total flow rate is used to calculate the destruction efficiency of the system.

Results

Prior to the commencement of the HVE event, an oil/water interface probe was used to measure the depth to product (if present) and depth to water in wells MWR-4D, RW-1, and RW-2. Separate phase hydrocarbons (“free product”) were not detected in any of the measured wells prior to performing the HVE event. Once static water levels were established, the system was connected to MWR-4D, RW-1, and RW-2. At each extraction point, a drop tube was positioned at the static fluid level, and once the ThermOx® unit reached its required operating temperature (1,400-1,500°F), the inlet flow valve was opened for the wells. During the HVE event at 16051 U.S. Highway 431, vacuum was applied to MWR-4D at 0830 hours, RW-2 at 0835 hours, and

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RW-1 at 0840 hours. The drop tube assembly was lowered to approximately 40 feet below the top of casing (BTOC) at MWR-4D, and approximately 45 feet BTOC at RW-1 and RW-2, creating a cone of influence in the subsurface around the wells. Air flow readings from the extraction points are presented on **Table 1** and shown on **Chart 1**.

During this event, 9.52 pounds of hydrocarbons were removed via vapor phase (equivalent to 1.55 gallons of gasoline), which brings the cumulative total for 3 events to 106.16 pounds of hydrocarbons removed (equivalent to 17.23 gallons of gasoline). A summary of the total hydrocarbon recovery rate is included on **Table 1**. Throughout the event, air concentration measurements were recorded periodically from both the influent and effluent sample ports. The measurements were recorded and compiled into the HVE field monitoring log, and additional calculations were made to determine the hydrocarbon loading rate. The total off-gas discharge (to the atmosphere) was 0.0 pounds of hydrocarbons, thus yielding an average 100% destruction rate by the ThermOx® unit.

Once the HVE event was complete, a second round of water level measurements was recorded. All wells connected to the system showed a change in water levels, with noticeable water table drawdown readings. During this event, 35 gallons of gas/water mixture were removed and retained in the vacuum truck tank. The gas/water mixture was transported by MEG to Sunoco LLC in Birmingham, AL for recycling. A copy of the Bill of Lading is attached.

Thank you for the opportunity to provide our services. If you have questions, please feel free to contact me at 205-467-0319.

Sincerely,

MILLER ENVIRONMENTAL GROUP, INC.

Nathan Burttram
Project Manager
Southeast Region

Enclosures: Table 1 – HVE Field Monitoring Data
Chart 1 – Recovery Flow Rates
Bill of Lading

Tables

MILLER ENVIRONMENTAL GROUP INC.

TABLE 1 - MEG HVE MONITORING DATA

Date:	December 11, 2020	Site Name:	RJ's Service Station	MEG Job #:	AL24200062	MEG Personnel	PID or FID make/model
Event #:	3	Site Address:	16051 U.S. Highway 431, Glencoe, AL	Consultant:	Poly, Inc.	Minshew/Anglin	MiniRAE 3000

SYSTEM #4

Time of Day	Interval of Time (minutes)	Vac Truck Applied Vac (in. Hg)	Applied Vacuum, Well Head Flow, and Bleed Air at Extraction Well(s)									Dilution Air Magnehelic			Process Air Stream Magnehelic			Total Flow Transmitter Magnehelic			Combined Air Influent PID (ppm)	Total Hydrocarbon Loading Rate (lbs/hr)	Total Hydrocarbons Removed (gal)	Total Hydrocarbon Removed (lbs)	Cumulative Total Hydrocarbons Removed (lbs)	ThermOx Temp (°F)	Digital Flow Recorder (scfm)	Effluent PID (ppm)	Destruction Efficiency (%)	Hydrocarbon Emission Rate (lbs/hr)	Total Hydrocarbons Discharged (lbs)	Cumulative Total Hydrocarbons Discharged (lbs)
			on at 0830			on at 0835			on at 0840																								
			MWR-4D			RW-2			RW-1																								
			in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)												
			(Recovery Flow Rates presented on Chart 1)																													
0830		18	16	765	5	--	--	--	--	--	--	0.2	1800	158	0.1	1300	114	0.7	3350	295	281	1.40	--	--	--	1436	295	0	100.0	0.00	0.000	0.000
0845	15	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	302	1.25	0.05	0.31	0.31	1438	246	0	100.0	0.00	0.000	0.000
0900	15	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	327	1.36	0.06	0.34	0.65	1436	246	0	100.0	0.00	0.000	0.000
0915	15	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	365	1.52	0.06	0.38	1.03	1436	246	0	100.0	0.00	0.000	0.000
0930	15	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	356	1.48	0.06	0.37	1.40	1434	246	0	100.0	0.00	0.000	0.000
1000	30	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	332	1.38	0.11	0.69	2.09	1437	246	0	100.0	0.00	0.000	0.000
1030	30	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	334	1.39	0.11	0.69	2.78	1436	246	0	100.0	0.00	0.000	0.000
1100	30	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	262	1.09	0.09	0.54	3.33	1434	246	0	100.0	0.00	0.000	0.000
1130	30	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	293	1.22	0.10	0.61	3.94	1432	246	0	100.0	0.00	0.000	0.000
1230	60	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	216	0.90	0.15	0.90	4.83	1434	246	0	100.0	0.00	0.000	0.000
1330	60	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	306	1.27	0.21	1.27	6.10	1436	246	0	100.0	0.00	0.000	0.000
1430	60	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	334	1.39	0.23	1.39	7.49	1434	246	0	100.0	0.00	0.000	0.000
1530	60	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	264	1.10	0.18	1.10	8.59	1437	246	0	100.0	0.00	0.000	0.000
1630	60	18	14	243	5	15	261	5	15	261	5	0.0	0	0	0.1	1300	114	0.5	2800	246	225	0.93	0.15	0.93	9.52	1439	246	0	100.0	0.00	0.000	0.000
				281 avg			261 avg			261 avg							114 avg						1.55 Total					250 avg		100.0 avg			

Comments
0830: MWR-4D online; drop tube set at 40 feet below top of casing (BTOC).
0835: RW-2 online; drop tube set at 45 feet BTOC.
0840: RW-1 online; drop tube set at 45 feet BTOC.
1630: End of HVE event.

Monitoring Well Gauging Data

Well Number	Before Event			Influence Vacuum (in. H_2O)	After Event			Water Level Change
	DTP	DTW	Prod. (ft)		DTP	DTW	Prod. (ft)	
MWR-4D	--	27.28	--		--	40.37	--	-13.09
RW-2	--	30.89	--		--	45.92	--	-15.03
RW-1	--	31.77	--		--	44.98	--	-13.21

This Event's Totals

Total Pounds of Hydrocarbon Removed This Event	9.52
Equivalent Gallons of Hydrocarbons Removed This Event	1.55
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	35
Gallons of Separate Phase Product in Vac Truck Tank at End of Event	0
Total Operating Time (Hours)	8

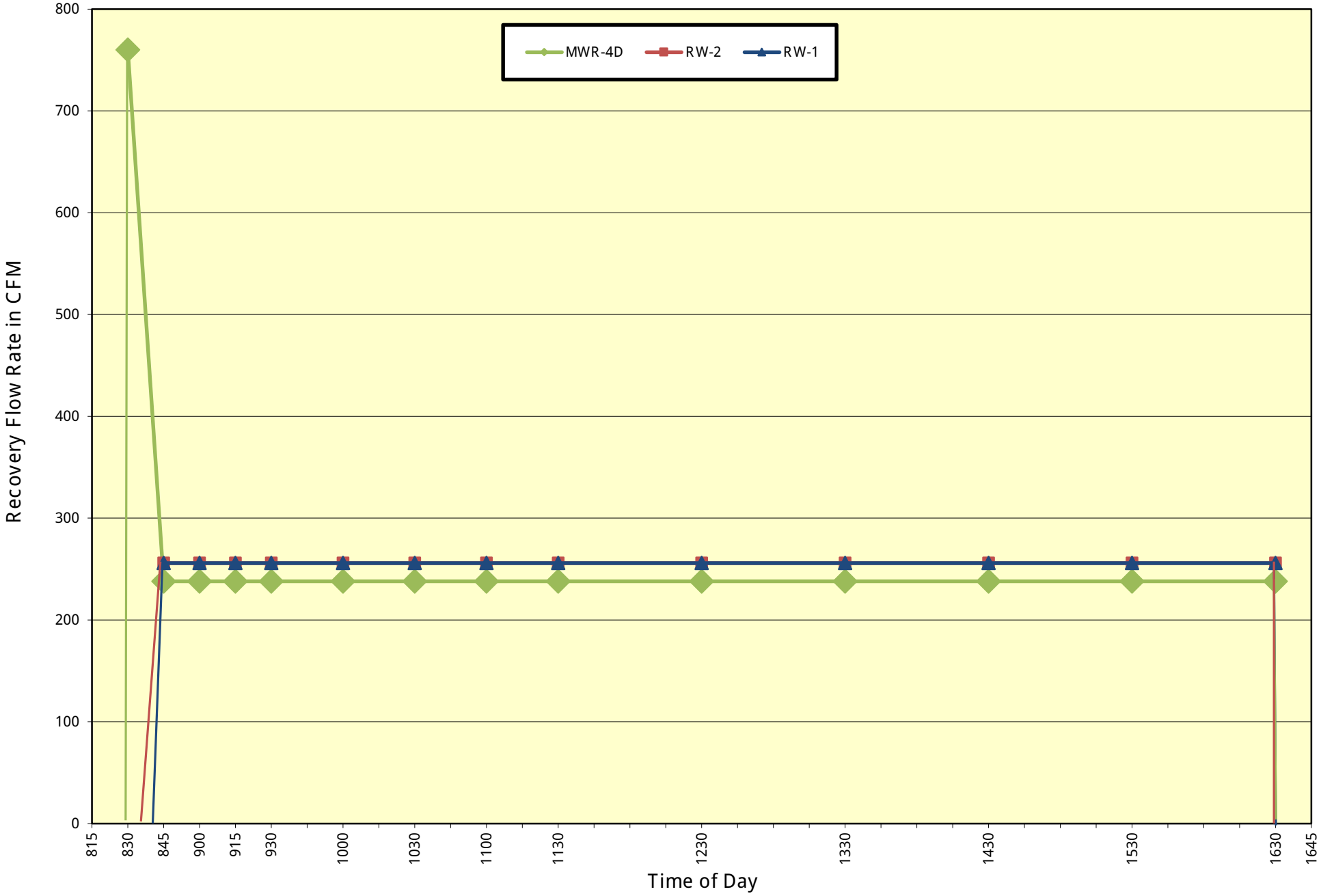
Cumulative (to date) Totals (3 events)

Total Pounds of Hydrocarbons Removed	106.16
Equivalent Gallons of Hydrocarbons Removed	17.23
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	506

Charts

MILLER ENVIRONMENTAL GROUP INC.

Chart 1: Well Head Flow Rates
HVE Event 3: RJ 's Service Station, Glencoe, AL
Performed by MEG on December 11, 2020



Shipping Documents

MILLER ENVIRONMENTAL GROUP INC.

Please print or type

BILL OF LADING

Generator EPA ID #

1. Document No. BIR5744

2. Page 1 of 1

3. Generator's Name and Mailing Address

Greg Johnson
P.O. Box 1551
Gadsden, AL 35902

4. Generator's Phone (205-752-4037

Site Address

RJ's Service Station
16051 U.S. Highway 431 South
Glencoe, Alabama 35905

5. Transporter 1 Company Name: Miller Environmental Group, Inc.

6. EPA ID #: NYD986908085

A. State Transporter's ID

B. Transporter 1 Phone: 631-369-4900

7. Transporter 2 Company Name

8. EPA ID #

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address

Sunoco, LLC
2700 Ishkooda-Wenonah Road
Birmingham, AL 35211

HM

10. EPA ID #: ALD000827022

E. State Facility's ID

F. Facility's Phone: 205-925-6600

	11. Shipping Name	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a.	NON-RCRA, NON-DOT, LIQUID, N.O.S. (PETROLEUM CONTACT WATER)		TT	35	G
b.					
c.					
d.					

GENERATOR

G. Additional Descriptions for Materials Listed Above

15. Special Handling Instructions and Additional Information

Job # AL24200062
P.O. # 6107T
No Approval Number Required

16. **GENERATOR'S CERTIFICATION:** I hereby certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. The materials described on this document are not subject to federal uniform hazardous waste manifest requirements.

Printed/Typed Name	Signature	Date (Month / Day / Year)
JEREMY MCDONALD		12 / 11 / 20

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month / Day / Year)
Bradley Anglin	Bradley Anglin	12 / 11 / 2020

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month / Day / Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the materials covered by this bill of lading except as noted in item 19.

Printed/Typed Name	Signature	Date (Month / Day / Year)
		12 / 17 / 20

BILL OF LADING

Remit to:
Miller Environmental Group, Inc.
538 Edwards Avenue
Calverton, NY 11933
Phone: (631) 369-4900
FAX: (631) 369-4996

Invoice

Bill to:
Poly, Inc.
117 Gemini Circle Suite #416
Birmingham AL 35209
United States

Job Site:
RJ's Service Station
16051 US Highway 431 South
Glencoe, Alabama 35905
United States

Invoice #:	10045754	Date:	5/20/2022
PO#:		Terms:	Net 30
Job:	AL24220120	Due Date:	6/19/2022

Service Date	Description	Quantity	Units	Rate	Amount
	05/09/2022 - 8-HOUR HVE Event.				
5/9/2022	8-HR Event and Report	1	Event	3,150.00	3,150.00
5/9/2022	Mobilization/Demobilization/Transportation of PCW	1	Each	$525.00	$525.00
5/9/2022	Recycle Petroleum Contact Water (BOL BIR6229)	141	Gallon	$0.275	$38.78

Subtotal	$3,713.78
Tax (%)	$0.00
Total	$3,713.78
Amount Paid	$0.00
Amount Due	$3,713.78

Past due invoices may be subject to 18% per annum interest charge. Effective September 1, 2021, the Insurance Risk, Security, and Training/ Compliance (IST) fee will change to 9%. Questions? Contact questions@millerenv.com

SUNOCOLP

8111 WESTCHESTER DRIVE STE 400
DALLAS TX 75225-6142

If any questions please reach out to :
CustomerSolutions.Mailbox@Sunoco.com

Branch:	Birmingham
Job #:	
Description:	Recycle PCW
Cost + Billable Y/N	
If not: T&M, FF, O/H	
Account #:	
Approval:	
Date Approved:	5/13/22

AL24220121-171-75
AL24220117-19.75
AL24220120-35.25

Invoice Number	6801588289
Invoice Date	05/13/2022
Payment Terms	Net 30 Days
Due Date	06/12/2022

Ship Date	05/13/2022	**Account Number**	1000045476
Ship From	S-MDSTREAM	**Tax Authority**	AL
Ship Via	SUNOCO, LLC	**Sales Person**	
Delivery Date	05/13/2022	**Please Remit To**	Sunoco,LLC P.O.Box 206458 Dallas,TX 75320-6458

Credit Memo/Invoice

Line No.	Item Description	Detailed Description	Billing Quantity	Unit Price	Amount
1	PCW Treatment	R20004 Service Date 05/11/2022	1,307	$0.25	$326.75
State Tax					$0.00
Invoice Total					$326.75

Late Payment Notification

A Late Payment charge will be made if Invoice is unpaid after Due Date

Sold To	Bill To	Business Location
1000045476	1000045476	8000966801
ENVIRONMENTAL PRODUCTS & SERV	ENVIRONMENTAL PRODUCTS & SERV	ENVIRONMENTAL PRODUCTS & SERV
5628 CLIFFORD CIRCLE	5628 CLIFFORD CIRCLE	5628 CLIFFORD CIRCLE
Birmingham AL 35210-0000	Birmingham AL 35210-0000	BIRMINGHAM Al 35210-0000

Recovery Report

Date Received by Sunoco	05/13/2022
PCW	
Gallons Received	1307.000
Gallons Recovered	1.000

THE OFF-SPEC FUEL OR PETROLEUM CONTACT WATER(PCW) RECEIVED FROM YOUR FACILITY WAS TREATED IN ACCORDANCE WITH ALL APPLICABLE STATE AND FEDERAL REGULATIONS. THE RECOVERY OF OFF-SPECIFICATION FUEL IS ADDRESSED IN USEPA'S RCRA PERMIT POLICY COMPENDIUM BY DOCUMENT NUMBERS 9441.1986 (19),(22),(95) J AND 9442.1985(01). IN SUMMARY, OFF-SPECIFICATION OR CONTAMINATED COMMERCIAL CHEMICAL PRODUCTS THATARE BURNED FOR ENERGY RECOVERY ARE NOT SOLID WASTES (AND THUS NOT HAZARDOUS WASTES) IF THEY ARE THEMSELVES FUELS. ALSO, RCRA REGULATIONS(261.2) (C) (3) INDICATE MATERIALS CONTAINING A COMMERCIAL PRODUCT INTENDED FOR RECLAMATION ARE EXCLUDED AS A SOLID WASTE, THUS NOT A HAZARDOUS WASTE.

Sunoco LLC

2700 Ishkooda-Wenonah Road
Birmingham, AL 35211-5705

Plant Use Only
R# 20004 Date: 5-11-22
Received by R: Dewi Beth
T# _____ Date: _____
Received by T: _____

AGREEMENT - RECEIPT OF PRODUCT BY SUNOCO LLC

SOURCE OF PRODUCT

Facility Name: Multiple Sites
Site Address: _____
City _____ State: ____ Zip _____
Phone: (____) _____
Fax: (____) _____
Contact: _____

BILLING INFORMATION

Customer Name: MILLER ENVIRONMENTAL GROUP
Billing Address: 5628 CLIFFORD CIR
City BIRMINGHAM State: AL Zip 35210
Phone: (205) 467-0319
Fax: (205) 467-0987
Contact: Nathan Bostram

PRODUCT INFORMATION

Please complete all information:

Tank Number 5757
Gallons 1307

Type of Product: *(Circle one)* (PCW) Sludge Petroleum TMIX
(If Sludge, further identify as): Gas Diesel Other_____

- The term petroleum contaminated waters ("PCW") means waters containing unused petroleum products and includes tank draw waters, tank cleaning waters/sludge, etc,
- Product containing materials such as fuel additives, pipeline lube or with greater than 5% ethanol are not considered PCW and special approval is required prior to shipment and acceptance.

AGREEMENT

(Additional terms and conditions on reverse side)

This document evidences the delivery by the company identified below ("Customer") and receipt by Sunoco LLC of PCW, sludge, petroleum transmix, or other product of the type and amount described above in the Product Information box. Customer acknowledges and agrees to the additional terms and conditions on the back of this form, and acknowledges receipt of a copy of the same.

NAME OF COMPANY: MILLER ENVIRONMENTAL GROUP
(Print Name of Company)
BY: Kelvin Jackson
(Signature of Company Representative)
NAME: Kelvin Jackson
(Print Name of Person Signing)
TITLE: EQUIPMENT OPERATOR.
(Print Title of Person Signing)
DATE: 5-11, 20 22

1/22479958.8

5628 Clifford Circle
Birmingham, AL 35210

Phone: (205) 467-0319
Fax: (205) 467-0987

May 16, 2022

Mr. Darral Kirby
Poly, Inc.
223 Aquarius Drive, Suite 116
Birmingham, AL 35209

RE: 8-Hour High Vacuum Extraction Event #13
RJ's Service Station
16051 U.S. Highway 431
Glencoe, AL
MEG Project No. AL24220120

Dear Mr. Kirby:

Miller Environmental Group, Inc. (MEG) is pleased to provide this summary of the High Vacuum Extraction (HVE) event conducted on May 9, 2022, at the referenced location above. Below is a summary of the technology, as well as the results of the actual event.

Technology

HVE involves the extraction of subsurface vapors and liquids via a monitoring well or recovery well. This is accomplished by applying high levels of vacuum to the extraction point. To eliminate mounding of the water table, a drop tube is inserted in the well to the static water level depth. The applied vacuum and airflow extracted from the well is pulled through this drop tube. As the water table attempts to mound due to the application of vacuum, the liquids are "slurped" through the drop tube. This slurping effectively maintains the static conditions of the water table while the elevated vacuum is applied to the well during the event. The slurping process also helps liberate contaminants from the smear zone as a result of capillary pressure. In order to minimize any change to the current smear zone associated with the site, seasonal water level is analyzed. Once the extraction process is underway, the inlet of the drop tube assembly is slowly lowered to a predetermined depth. Theoretically the drop tube can be lowered to the maximum historical water level observed for each extraction well. This drawdown below the static water level depresses the water table and creates a cone of influence, which maximizes the efficiency of the high vacuum process.

Occasionally, fresh air is introduced at the well surface to increase the airflow and enhance the liquid removal rate. To accurately record the actual removal rate from the well, an airflow gauge is mounted on the well head to measure the amount of fresh air that is introduced. This extra fresh air is subtracted from the total flow calculated for each extraction well. Additionally, a set of two vacuum gauges are installed on the well head assembly; one on the drop tube assembly (well head vacuum), and one on the well casing (influence vacuum). If fresh air is introduced at the well head, the influence vacuum reading will be artificially lower than the actual applied vacuum because the inlet for fresh air is adjacent to this vacuum gauge port.

During the extraction process, the combined air and liquids are transferred to a 3,000-gallon capacity vacuum truck via a manifold mounted on the portable thermal oxidation treatment system where the liquids are separated using the vacuum truck as the knockout tank. The hydrocarbon vapors are transferred to the off-gas thermal oxidation system (when necessary to meet air discharge requirements) and are incinerated in the ThermOx® unit at 1,400-1,500°Fahrenheit (F). After thorough destruction of the contaminants in the air stream, the clean air is discharged into the atmosphere.

Calculations

During the HVE event, measurements are collected of both the influent and effluent flow rates, the concentrations of the vapors removed (before off-gas treatment), and the off-gas treatment system concentrations. These measurements are used to calculate the removal rates and the off-gas emission rates. These flow rates are measured using a pitot tube-type flow meter. Before each event, these flow assemblies are calibrated to ensure an accurate flow measurement. A separate flow rate is calculated for each influent well (if more than one well is connected), as well as for any additional fresh air that is introduced into the influent stream. These individual flow rates are combined to achieve the total flow and velocity derived from the extraction points. Because of the extremely high concentrations involved with an HVE event, additional quench air may be added to the vapor stream, just before entering the ThermOx® unit. An additional pitot tube assembly is installed at the inlet of the ThermOx® unit and is used to measure the total flow. Combined with the off-gas concentration readings, this total flow rate is used to calculate the destruction efficiency of the system.

Results

Prior to the commencement of the HVE event, an oil/water interface probe was used to measure the depth to product (if present) and depth to water in wells MWR-4D, MW-14D, RW-1, and RW-2. Separate phase hydrocarbons (“free product”) were not detected in any of the measured wells prior to performing the HVE event. Once static water levels were established, the system was connected to MWR-4D, MW-14D, RW-1, and RW-2. At each extraction point, a drop tube was positioned at the static fluid level, and once the ThermOx® unit reached its required operating temperature (1,400-1,500°F), the inlet flow valve was opened for the wells. During the HVE event at 16051 U.S. Highway 431, vacuum was applied to MWR-4D and RW-2 at 0800

5628 Clifford Circle
Birmingham, AL 35210

Phone: (205) 467-0319
Fax: (205) 467-0987

hours, RW-1 at 0900 hours, and MW-14D at 1200 hours. The drop tube assemblies were lowered to approximately two feet from the bottom of each well, creating a cone of influence in the subsurface around the wells. Air flow readings from the extraction points are presented on **Table 1** and shown on **Chart 1**.

During this event, 0.23 pounds of hydrocarbons were removed via vapor phase (equivalent to 0.04 gallons of gasoline), which brings the cumulative total for 13 events to 163.29 pounds of hydrocarbons removed (equivalent to 26.50 gallons of gasoline). A summary of the total hydrocarbon recovery rate is included on **Table 1**. Throughout the event, air concentration measurements were recorded periodically from both the influent and effluent sample ports. The measurements were recorded and compiled into the HVE field monitoring log, and additional calculations were made to determine the hydrocarbon loading rate. The total off-gas discharge (to the atmosphere) was 0.0 pounds of hydrocarbons, thus yielding an average 100% destruction rate by the ThermOx® unit.

Once the HVE event was complete, a second round of water level measurements was recorded. All wells connected to the system showed a change in water levels, with noticeable water table drawdown readings. During this event, 141 gallons of gas/water mixture were removed and retained in the vacuum truck tank. The gas/water mixture was transported by MEG to Sunoco LLC in Birmingham, AL for recycling. A copy of the Bill of Lading is attached.

Thank you for the opportunity to provide our services. If you have questions, please feel free to contact me at 205-467-0319.

Sincerely,

MILLER ENVIRONMENTAL GROUP, INC.

Nathan Burttram
Branch Manager

Enclosures: Table 1 – HVE Field Monitoring Data
Chart 1 – Recovery Flow Rates
Bill of Lading

Tables

MILLER ENVIRONMENTAL GROUP INC.

TABLE 1 - MEG HVE MONITORING DATA

Date:	May 9, 2022	Site Name:		RJ's Service Station	MEG Job #:	AL24220120	MEG Personnel	PID or FID make/model
Event #:	13	Site Address:		16051 U.S. Highway 431, Glencoe, AL	Consultant:	Poly, Inc.	Craig/Cunningham	MiniRAE 3000

SYSTEM #1

Time of Day	Interval of Time (minutes)	Vac Truck Applied Vac (in. Hg)	Applied Vacuum, Well Head Flow, and Bleed Air at Extraction Well(s)												Dilution Air Magnehelic			Process Air Stream Magnehelic			Total Flow Transmitter Magnehelic			Combined Air Influent PID (ppm)	Total Hydrocarbon Loading Rate (lbs/hr)	Total Hydrocarbons Removed (gal)	Total Hydrocarbon Removed (lbs)	**Cumulative Total Hydrocarbons Removed (lbs)**	ThermOx Temp (°F)	Digital Flow Recorder (scfm)	Effluent PID (ppm)	Destruction Efficiency (%)	Hydrocarbon Emission Rate (lbs/hr)	Total Hydrocarbons Discharged (lbs)	**Cumulative Total Hydrocarbons Discharged (lbs)**
			on at 0900			on at 0800			on at 0800			on at 1200																								
			RW-1			RW-2			MWR-4D			MW-14D																								
			(Recovery Flow Rates presented on Chart 1)																																
			in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)											
0800	--	18	--	--	--	15	382	5	15	382	5	--	--	--	0.2	1800	353	0.01	780	153	0.7	3350	658	18	0.20	--	--	--	1408	658	0	100.0	0.000	0.000	0.000
0815	15	18	--	--	--	14	382	5	14	382	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	19	0.18	0.01	0.04	0.04	1412	550	0	100.0	0.000	0.000	0.000
0830	15	18	--	--	--	14	382	5	14	382	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	17	0.16	0.01	0.04	0.08	1407	550	0	100.0	0.000	0.000	0.000
0845	15	18	--	--	--	14	382	5	14	382	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	3	0.03	0.00	0.01	0.09	1401	550	0	100.0	0.000	0.000	0.000
0900	15	18	14	255	5	14	255	5	14	255	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	2	0.02	0.00	0.00	0.10	1419	550	0	100.0	0.000	0.000	0.000
0930	30	18	14	255	5	14	255	5	14	255	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	1	0.01	0.00	0.00	0.10	1409	550	0	100.0	0.000	0.000	0.000
1000	30	18	14	255	5	14	255	5	14	255	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	3	0.03	0.00	0.01	0.11	1413	550	0	100.0	0.000	0.000	0.000
1030	30	18	14	255	5	14	255	5	14	255	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	2	0.02	0.00	0.01	0.12	1410	550	0	100.0	0.000	0.000	0.000
1100	30	18	14	255	5	14	255	5	14	255	5	--	--	--	0.0	0	0	0.01	780	153	0.5	2800	550	4	0.04	0.00	0.02	0.14	1415	550	0	100.0	0.000	0.000	0.000
1200	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	4	0.04	0.01	0.04	0.18	1402	550	0	100.0	0.000	0.000	0.000
1300	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	2	0.02	0.00	0.02	0.20	1412	550	0	100.0	0.000	0.000	0.000
1400	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	2	0.02	0.00	0.02	0.22	1410	550	0	100.0	0.000	0.000	0.000
1500	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	1	0.01	0.00	0.01	0.23	1408	550	0	100.0	0.000	0.000	0.000
1600	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	1	0.01	0.00	0.01	**0.23**	1408	550	0	100.0	0.000	0.000	**0.000**
				223 avg			269 avg			269 avg			191 avg						153 avg								**0.04 Total**				558 avg		**100.0 avg**		

Comments
0800: RW-2 and MWR-4D online; drop tubes set 2 feet off the bottom of the wells.
0900: RW-1 online; drop tube set 2 feet off the bottom of the wells.
1200: MW-14D online; drop tube set 2 feet off the bottom of the wells.
1600: End of HVE event.

Monitoring Well Gauging Data

Well Number	Before Event			Influence Vacuum (in. H_2O)	After Event			Water Level Change
	DTP	DTW	Prod. (ft)		DTP	DTW	Prod. (ft)	
RW-1	--	22.95	--		--	NM	--	NA
RW-2	--	22.42	--		--	43.89	--	-21.47
MWR-4D	--	11.48	--		--	28.57	--	-17.09
MW-14D	--	26.63	--		--	29.99	--	-3.36

Monitoring Well Gauging Data

This Event's Totals

Total Pounds of Hydrocarbon Removed This Event	0.23
Equivalent Gallons of Hydrocarbons Removed This Event	0.04
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	141
Gallons of Separate Phase Product in Vac Truck Tank at End of Event	0
Total Operating Time (Hours)	8

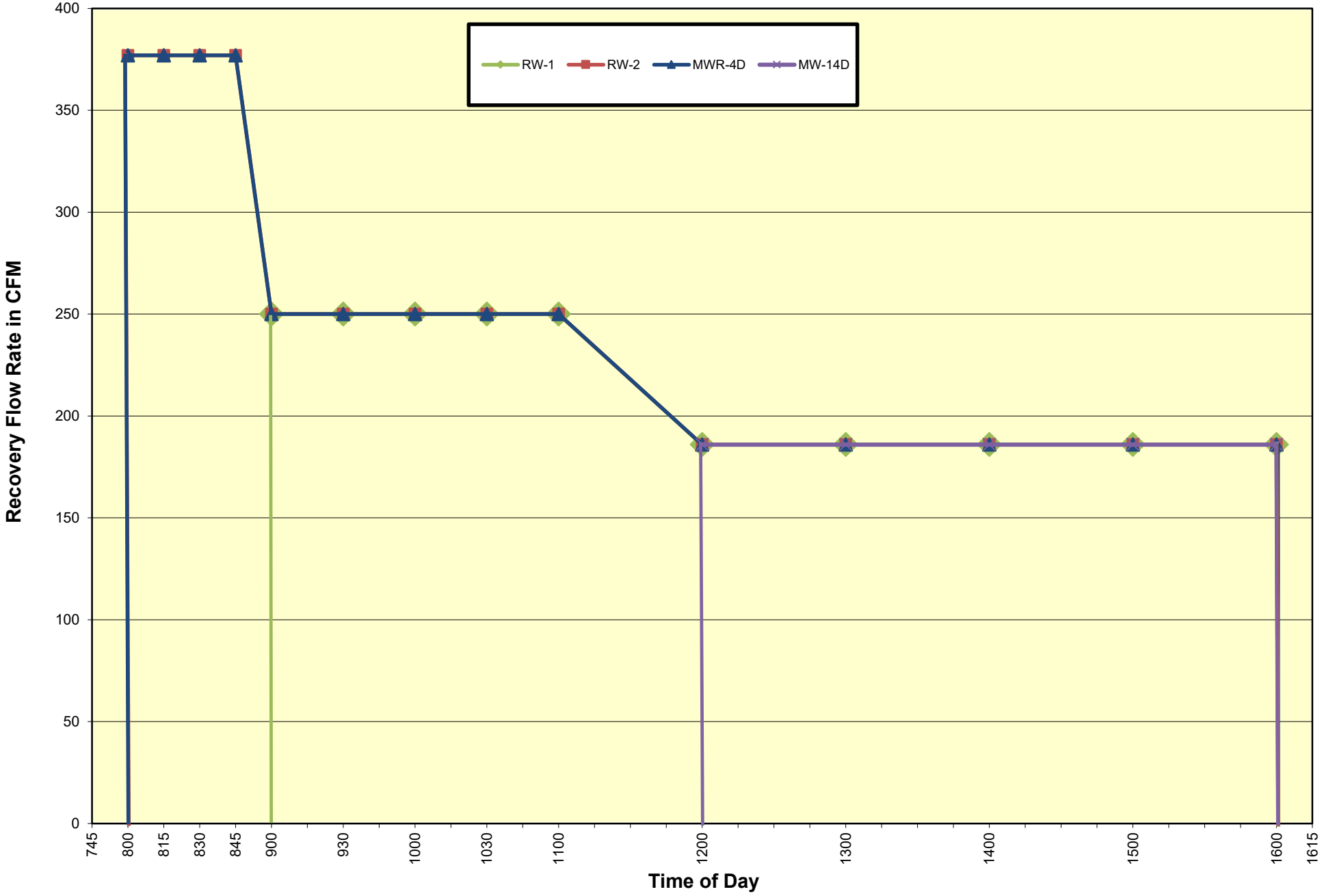
Cumulative (to date) Totals (13 events)

Total Pounds of Hydrocarbons Removed	163.29
Equivalent Gallons of Hydrocarbons Removed	26.50
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	1,769

Charts

MILLER ENVIRONMENTAL GROUP INC.

Chart 1: Well Head Flow Rates
HVE Event 13: RJ's Service Station, Glencoe, AL
Performed by MEG on May 9, 2022



Shipping Documents

MILLER ENVIRONMENTAL GROUP INC.

Please print or type

BILL OF LADING

Generator EPA ID #

1. Document No. BIR6229

2. Page 1 of 1

3. Generator's Name and Mailing Address
Greg Johnson
P.O. Box 151
Gardendale AL 35201
4. Generator's Phone (205) 792-4037

Site Address
AST Service Station
(6051 U.S. Hwy 431 South),
Gurnee AL 35905

5. Transporter 1 Company Name: Miller Environmental Group Inc
6. EPA ID #: ALD986907095

A. State Transporter's ID

B. Transporter 1 Phone 700-394-3606

7. Transporter 2 Company Name

8. EPA ID #

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address
Suneco LLC
7700 Ishkooda Industrial Rd
Birmingham AL 35211
HM

10. EPA ID #: ALD000927032

E. State Facility's ID

F. Facility's Phone 205-785-6600

GENERATOR

	11. Shipping Name	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a.	Non RCRA, non DOT, Liquid, N.O.S. (Petroleum Contact water)	1	TT	~~350~~ 141	G
b.					
c.					
d.					

G. Additional Descriptions for Materials Listed Above

15. Special Handling Instructions and Additional Information
Job # AL9220120
No Approval Number Required.

16. **GENERATOR'S CERTIFICATION:** I hereby certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. The materials described on this document are not subject to federal uniform hazardous waste manifest requirements.

Printed/Typed Name: Kelly Lee | Signature | Date: Month 5 Day 29 Year 22

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Marcus Craig | Signature | Date: Month 5 Day 9 Year 22

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the materials covered by this bill of lading except as noted in item 19.

Printed/Typed Name: Devin Bush R# 20004 | Signature | Date: Month 5 Day 11 Year 22

BILL OF LADING

Remit to:
Miller Environmental Group, Inc.
538 Edwards Avenue
Calverton, NY 11933
Phone: (631) 369-4900
FAX: (631) 369-4996

Invoice

Bill to:
Poly, Inc.
117 Gemini Circle Suite #416
Birmingham AL 35209
United States

Job Site:
RJ's Service Station
16051 US Highway 431 South
Glencoe, Alabama 35905
United States

Services provided by: MEG Birmingham Operations Center. Questions please call us 205-467-0319.

Invoice #:	10048015	Date:	6/24/2022
PO#:		Terms:	Net 30
Job:	AL24220144	Due Date:	7/24/2022

Service Date	Description	Quantity	Units	Rate	Amount
	06/06/2022 - 8-HOUR HVE Event.				
6/6/2022	8-HR Event and Report	1	Event	3,150.00	3,150.00
6/6/2022	Mobilization/Demobilization/Transportation of PCW	1	Event	$525.00	$525.00
6/6/2022	Recycle Petroleum Contact Water (BOL BIR6261)	97	Gallon	$0.275	$26.68

Subtotal	$3,728.36
Tax (%)	$0.00
Total	$3,728.36
Amount Paid	$0.00
Amount Due	$3,728.36

Past due invoices may be subject to 18% per annum interest charge.
Effective September 1, 2021, the Insurance Risk, Security, and Training/ Compliance (IST) fee will change to 9%. Questions? Contact AR@millerenv.com

8111 WESTCHESTER DRIVE STE 400
DALLAS TX 75225-6142

If any questions please reach out to :

CustomerSolutions.Mailbox@Sunoco.com

Invoice Number	6801651902
Invoice Date	06/20/2022
Payment Terms	Net 30 Days
Due Date	07/20/2022

Ship Date	06/20/2022	**Account Number**	1000045476
Ship From	S-MDSTREAM	**Tax Authority**	AL
Ship Via	SUNOCO, LLC	**Sales Person**	
Delivery Date	06/20/2022	**Please Remit To**	Sunoco,LLC P.O.Box 206458 Dallas,TX 75320-6458

Credit Memo/Invoice

Line No.	Item Description	Detailed Description	Billing Quantity	Unit Price	Amount
1	PCW Treatment	R20119 Service Date 06/15/2022	674	$0.25	$168.50
State Tax					$0.00
Invoice Total					$168.50

Late Payment Notification

A Late Payment charge will be made if Invoice is unpaid after Due Date

Sold To	Bill To	Business Location
1000045476	**1000045476**	**8000966801**
ENVIRONMENTAL PRODUCTS & SERV	ENVIRONMENTAL PRODUCTS & SERV	ENVIRONMENTAL PRODUCTS & SERV
5628 CLIFFORD CIRCLE	5628 CLIFFORD CIRCLE	5628 CLIFFORD CIRCLE
Birmingham AL 35210-0000	Birmingham AL 35210-0000	BIRMINGHAM Al 35210-0000

Recovery Report

Date Received by Sunoco	06/20/2022
PCW	
Gallons Received	674.000
Gallons Recovered	1.000

THE OFF-SPEC FUEL OR PETROLEUM CONTACT WATER(PCW) RECEIVED FROM YOUR FACILITY WAS TREATED IN ACCORDANCE WITH ALL APPLICABLE STATE AND FEDERAL REGULATIONS. THE RECOVERY OF OFF-SPECIFICATION FUEL IS ADDRESSED IN USEPA'S RCRA PERMIT POLICY COMPENDIUM BY DOCUMENT NUMBERS 9441.1986 (19),(22),(95) J AND 9442.1985(01). IN SUMMARY, OFF-SPECIFICATION OR CONTAMINATED COMMERCIAL CHEMICAL PRODUCTS THATARE BURNED FOR ENERGY RECOVERY ARE NOT SOLID WASTES (AND THUS NOT HAZARDOUS WASTES) IF THEY ARE THEMSELVES FUELS. ALSO, RCRA REGULATIONS(261.2) (C) (3) INDICATE MATERIALS CONTAINING A COMMERCIAL PRODUCT INTENDED FOR RECLAMATION ARE EXCLUDED AS A SOLID WASTE, THUS NOT A HAZARDOUS WASTE.

SUNOCO, LLC

Sunoco LLC

2700 Ishkooda-Wenonah Road
Birmingham, AL 35211-5705

Plant Use Only	
R # 20119	Date: 6-15-2022
Received by R:	Brandon McCrary
T #	Date:
Received by T:	

AGREEMENT - RECEIPT OF PRODUCT BY SUNOCO LLC

SOURCE OF PRODUCT

Facility Name: Multiple Locations
Site Address:
City State: Zip
Phone: ( )
Fax: ( )
Contact:

BILLING INFORMATION

Customer Name: MILLER ENVIRONMENTAL GROUP
Billing Address: 5628 CLIFFORD CIR
City BIRMINGHAM State: AL Zip 35210
Phone: (205) 467-0319
Fax: (205) 467-0987
Contact: Nathan Bultman

PRODUCT INFORMATION

Please complete all information:

Tank Number 5757
Gallons 674

Type of Product: *(Circle one)* **PCW** **Sludge** **Petroleum** **TMIX**
(If Sludge, further identify as): ~~Gas~~ **Diesel** **Other**

- The term petroleum contaminated waters ("PCW") means waters containing unused petroleum products and includes tank draw waters, tank cleaning waters/sludge, etc,
- Product containing materials such as fuel additives, pipeline lube or with greater than 5% ethanol are not considered PCW and special approval is required prior to shipment and acceptance.

AGREEMENT

(Additional terms and conditions on reverse side)

This document evidences the delivery by the company identified below ("Customer") and receipt by Sunoco LLC of PCW, sludge, petroleum transmix, or other product of the type and amount described above in the Product Information box. Customer acknowledges and agrees to the additional terms and conditions on the back of this form, and acknowledges receipt of a copy of the same.

NAME OF COMPANY: MILLER ENVIRONMENTAL GROUP
(Print Name of Company)

BY:
(Signature of Company Representative)

NAME: Marcus Lewis
(Print Name of Person Signing)

TITLE: EQUIPMENT OPERATOR.
(Print Title of Person Signing)

DATE: 6/15, 20 22

1/2247958.8

5628 Clifford Circle
Birmingham, AL 35210

Phone: (205) 467-0319
Fax: (205) 467-0987

June 22, 2022

Mr. Darral Kirby
Poly, Inc.
223 Aquarius Drive, Suite 116
Birmingham, AL 35209

RE: 8-Hour High Vacuum Extraction Event #14
RJ's Service Station
16051 U.S. Highway 431
Glencoe, AL
MEG Project No. AL24220144

Dear Mr. Kirby:

Miller Environmental Group, Inc. (MEG) is pleased to provide this summary of the High Vacuum Extraction (HVE) event conducted on June 6, 2022, at the referenced location above. Below is a summary of the technology, as well as the results of the actual event.

Technology

HVE involves the extraction of subsurface vapors and liquids via a monitoring well or recovery well. This is accomplished by applying high levels of vacuum to the extraction point. To eliminate mounding of the water table, a drop tube is inserted in the well to the static water level depth. The applied vacuum and airflow extracted from the well is pulled through this drop tube. As the water table attempts to mound due to the application of vacuum, the liquids are "slurped" through the drop tube. This slurping effectively maintains the static conditions of the water table while the elevated vacuum is applied to the well during the event. The slurping process also helps liberate contaminants from the smear zone as a result of capillary pressure. In order to minimize any change to the current smear zone associated with the site, seasonal water level is analyzed. Once the extraction process is underway, the inlet of the drop tube assembly is slowly lowered to a predetermined depth. Theoretically the drop tube can be lowered to the maximum historical water level observed for each extraction well. This drawdown below the static water level depresses the water table and creates a cone of influence, which maximizes the efficiency of the high vacuum process.

5628 Clifford Circle
Birmingham, AL 35210
Phone: (205) 467-0319
Fax: (205) 467-0987

Occasionally, fresh air is introduced at the well surface to increase the airflow and enhance the liquid removal rate. To accurately record the actual removal rate from the well, an airflow gauge is mounted on the well head to measure the amount of fresh air that is introduced. This extra fresh air is subtracted from the total flow calculated for each extraction well. Additionally, a set of two vacuum gauges are installed on the well head assembly; one on the drop tube assembly (well head vacuum), and one on the well casing (influence vacuum). If fresh air is introduced at the well head, the influence vacuum reading will be artificially lower than the actual applied vacuum because the inlet for fresh air is adjacent to this vacuum gauge port.

During the extraction process, the combined air and liquids are transferred to a 3,000-gallon capacity vacuum truck via a manifold mounted on the portable thermal oxidation treatment system where the liquids are separated using the vacuum truck as the knockout tank. The hydrocarbon vapors are transferred to the off-gas thermal oxidation system (when necessary to meet air discharge requirements) and are incinerated in the ThermOx® unit at 1,400-1,500°Fahrenheit (F). After thorough destruction of the contaminants in the air stream, the clean air is discharged into the atmosphere.

Calculations

During the HVE event, measurements are collected of both the influent and effluent flow rates, the concentrations of the vapors removed (before off-gas treatment), and the off-gas treatment system concentrations. These measurements are used to calculate the removal rates and the off-gas emission rates. These flow rates are measured using a pitot tube-type flow meter. Before each event, these flow assemblies are calibrated to ensure an accurate flow measurement. A separate flow rate is calculated for each influent well (if more than one well is connected), as well as for any additional fresh air that is introduced into the influent stream. These individual flow rates are combined to achieve the total flow and velocity derived from the extraction points. Because of the extremely high concentrations involved with an HVE event, additional quench air may be added to the vapor stream, just before entering the ThermOx® unit. An additional pitot tube assembly is installed at the inlet of the ThermOx® unit and is used to measure the total flow. Combined with the off-gas concentration readings, this total flow rate is used to calculate the destruction efficiency of the system.

Results

Prior to the commencement of the HVE event, an oil/water interface probe was used to measure the depth to product (if present) and depth to water in wells MWR-4D, MW-14D, RW-1, and RW-2. Separate phase hydrocarbons (“free product”) were not detected in any of the measured wells prior to performing the HVE event. Once static water levels were established, the system was connected to MWR-4D, MW-14D, RW-1, and RW-2. At each extraction point, a drop tube was positioned at the static fluid level, and once the ThermOx® unit reached its required operating temperature (1,400-1,500°F), the inlet flow valve was opened for the wells. During the HVE event at 16051 U.S. Highway 431, vacuum was applied to MWR-4D, MW-14D, and RW-2

5628 Clifford Circle
Birmingham, AL 35210

Phone: (205) 467-0319
Fax: (205) 467-0987

at 0800 hours, and RW-1 at 0815 hours. The drop tube assemblies were lowered to approximately two feet from the bottom of each well, creating a cone of influence in the subsurface around the wells. Air flow readings from the extraction points are presented on **Table 1** and shown on **Chart 1**.

During this event, 2.45 pounds of hydrocarbons were removed via vapor phase (equivalent to 0.40 gallons of gasoline), which brings the cumulative total for 14 events to 165.74 pounds of hydrocarbons removed (equivalent to 26.90 gallons of gasoline). A summary of the total hydrocarbon recovery rate is included on **Table 1**. Throughout the event, air concentration measurements were recorded periodically from both the influent and effluent sample ports. The measurements were recorded and compiled into the HVE field monitoring log, and additional calculations were made to determine the hydrocarbon loading rate. The total off-gas discharge (to the atmosphere) was 0.0 pounds of hydrocarbons, thus yielding an average 100% destruction rate by the ThermOx® unit.

Once the HVE event was complete, a second round of water level measurements was recorded. All wells connected to the system showed a change in water levels, with noticeable water table drawdown readings. During this event, 97 gallons of gas/water mixture were removed and retained in the vacuum truck tank. The gas/water mixture was transported by MEG to Sunoco LLC in Birmingham, AL for recycling. A copy of the Bill of Lading is attached.

Thank you for the opportunity to provide our services. If you have questions, please feel free to contact me at 205-467-0319.

Sincerely,

MILLER ENVIRONMENTAL GROUP, INC.

Nathan Burttram
Branch Manager

Enclosures: Table 1 – HVE Field Monitoring Data
Chart 1 – Recovery Flow Rates
Bill of Lading

Tables

MILLER ENVIRONMENTAL GROUP INC.

TABLE 1 - MEG HVE MONITORING DATA

Date:	June 6, 2022	Site Name:		RJ's Service Station	MEG Job #:	AL24220144	MEG Personnel	PID or FID make/model
Event #:	14	Site Address:		16051 U.S. Highway 431, Glencoe, AL	Consultant:	Poly, Inc.	Craig/Cunningham	MiniRAE 3000

SYSTEM #1

Time of Day	Interval of Time (minutes)	Vac Truck Applied Vac (in. Hg)	Applied Vacuum, Well Head Flow, and Bleed Air at Extraction Well(s) (Recovery Flow Rates presented on Chart 1)												Dilution Air Magnehelic			Process Air Stream Magnehelic			Total Flow Transmitter Magnehelic			Combined Air Influent PID (ppm)	Total Hydrocarbon Loading Rate (lbs/hr)	Total Hydrocarbons Removed (gal)	Total Hydrocarbon Removed (lbs)	**Cumulative Total Hydrocarbons Removed (lbs)**	ThermOx Temp (°F)	Digital Flow Recorder (scfm)	Effluent PID (ppm)	Destruction Efficiency (%)	Hydrocarbon Emission Rate (lbs/hr)	Total Hydrocarbons Discharged (lbs)	**Cumulative Total Hydrocarbons Discharged (lbs)**
			on at 0800			on at 0800			on at 0800			on at 0815																							
			MW-14D			MWR-4D			RW-2			RW-1																							
			in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)											
0800	--	18	16	255	5	16	255	5	16	255	5	--	--	--	0.2	1800	353	0.01	780	153	0.7	3350	658	9	0.10	--	--	--	1419	658	0	100.0	0.000	0.000	0.000
0815	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	12	0.11	0.00	0.03	0.03	1426	550	0	100.0	0.000	0.000	0.000
0830	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	21	0.19	0.01	0.05	0.08	1416	550	0	100.0	0.000	0.000	0.000
0845	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	33	0.31	0.01	0.08	0.15	1421	550	0	100.0	0.000	0.000	0.000
0900	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	41	0.38	0.02	0.10	0.25	1414	550	0	100.0	0.000	0.000	0.000
0930	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	44	0.41	0.03	0.20	0.45	1424	550	0	100.0	0.000	0.000	0.000
1000	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	49	0.45	0.04	0.23	0.68	1417	550	0	100.0	0.000	0.000	0.000
1030	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	40	0.37	0.03	0.19	0.87	1410	550	0	100.0	0.000	0.000	0.000
1100	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	43	0.40	0.03	0.20	1.07	1420	550	0	100.0	0.000	0.000	0.000
1200	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	37	0.34	0.06	0.34	1.41	1424	550	0	100.0	0.000	0.000	0.000
1300	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	30	0.28	0.05	0.28	1.69	1420	550	0	100.0	0.000	0.000	0.000
1400	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	29	0.27	0.04	0.27	1.96	1426	550	0	100.0	0.000	0.000	0.000
1500	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	31	0.29	0.05	0.29	2.24	1421	550	0	100.0	0.000	0.000	0.000
1600	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	22	0.20	0.03	0.20	**2.45**	1426	550	0	100.0	0.000	0.000	**0.000**
				196 avg			196 avg			196 avg			191 avg							153 avg						**0.40 Total**					558 avg		**100.0 avg**			

Comments
0800: MW-14D, MWR-4D, and RW-2 online; drop tubes set 2 feet off the bottom of the wells.
0815: RW-1 online; drop tube set 2 feet off the bottom of the wells.
1600: End of HVE event.

Monitoring Well Gauging Data

Well Number	Before Event			Influence Vacuum (in. H_2O)	After Event			Water Level Change
	DTP	DTW	Prod. (ft)		DTP	DTW	Prod. (ft)	
RW-1	--	31.50	--		--	33.26	--	-1.76
RW-2	--	31.60	--		--	44.67	--	-13.07
MWR-4D	--	26.22	--		--	28.49	--	-2.27
MW-14D	--	34.91	--		--	34.56	--	0.35

Monitoring Well Gauging Data

This Event's Totals

Total Pounds of Hydrocarbon Removed This Event	2.45
Equivalent Gallons of Hydrocarbons Removed This Event	0.40
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	97
Gallons of Separate Phase Product in Vac Truck Tank at End of Event	0
Total Operating Time (Hours)	8

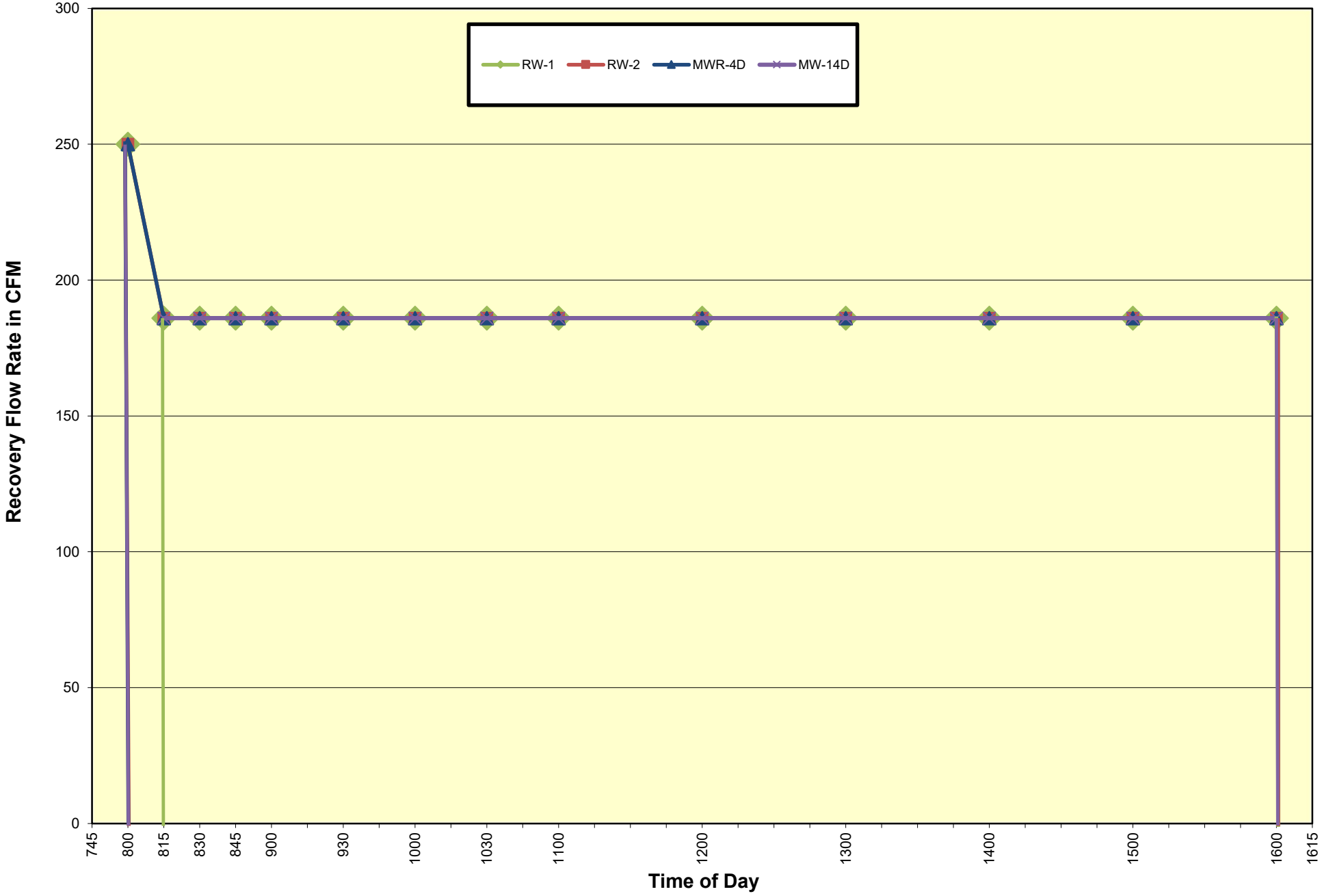
Cumulative (to date) Totals (14 events)

Total Pounds of Hydrocarbons Removed	165.74
Equivalent Gallons of Hydrocarbons Removed	26.90
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	1,866

Charts

MILLER ENVIRONMENTAL GROUP INC.

Chart 1: Well Head Flow Rates
HVE Event 14: RJ's Service Station, Glencoe, AL
Performed by MEG on June 6, 2022



Shipping Documents

MILLER ENVIRONMENTAL GROUP INC.

Please print or type

BILL OF LADING

Generator EPA ID #

1. Document No. BIR6761

2. Page 1 of 1

3. Generator's Name and Mailing Address
Greg Johnson
PO Box 151
Gadsden AL 35902
4. Generator's Phone (205) 797 - 1033

Site Address
RJ's Service Station
16051 U.S Hwy 431 South
Gurnee AL 35905

5. Transporter 1 Company Name: Miller Environmental Group, Inc
6. EPA ID #: NYD986905085
A. State Transporter's ID
B. Transporter 1 Phone: 800-394-8606

7. Transporter 2 Company Name
8. EPA ID #
C. State Transporter's ID
D. Transporter 2 Phone

9. Designated Facility Name and Site Address
Sunoco LLC
9700 Parkway Industrial Park
Birmingham AL 35211
HM
10. EPA ID #: ALD000837022
E. State Facility's ID
F. Facility's Phone: 205-979-6600

GENERATOR

	11. Shipping Name	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a.	Non RCRA, Non DOT, Liquid, N.O.S. (Petroleum Contact water)	1	TT	97	G
b.					
c.					
d.					

G. Additional Descriptions for Materials Listed Above

15. Special Handling Instructions and Additional Information
Job # AL2422-144
No Approval Number Required.

16. **GENERATOR'S CERTIFICATION:** I hereby certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. The materials described on this document are not subject to federal uniform hazardous waste manifest requirements.

Printed/Typed Name	Signature	Date: Month	Day	Year
Kelly Lee		6	6	22

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year
Marcus Craig		6	6	22

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the materials covered by this bill of lading except as noted in item 19.

Printed/Typed Name	Signature	Date: Month	Day	Year
		6	15	22

BILL OF LADING

Remit to:
Miller Environmental Group, Inc.
538 Edwards Avenue
Calverton, NY 11933
Phone: (631) 369-4900
FAX: (631) 369-4996

Invoice

Bill to:
Poly, Inc.
117 Gemini Circle Suite #416
Birmingham AL 35209
United States

Job Site:
RJ's Service Station
16051 US Highway 431 South
Glencoe, Alabama 35905
United States

Services provided by: MEG Birmingham Operations Center. Questions please call us 205-467-0319.

Invoice #:	10050116	Date:	7/29/2022
PO#:		Terms:	Net 30
Job:	AL24220174	Due Date:	8/28/2022

Service Date	Description	Quantity	Units	Rate	Amount
	07/18/2022 - 8-HOUR HVE EVENT.				
7/18/2022	8-Hour Event and Report	1	Event	3,150.00	3,150.00
7/18/2022	Transportation of PCW/Mob/Demob	1	Event	$525.00	$525.00
7/18/2022	Recycle PCW (BOL BIR6292)	47	Gallon	$0.275	$12.93
7/18/2022	Additional Fuel Surcharge			$206.25	$206.25

Subtotal	$3,894.18
Tax (%)	$0.00
Total	$3,894.18
Amount Paid	$0.00
Amount Due	$3,894.18

Past due invoices may be subject to 18% per annum interest charge.
Effective September 1, 2021, the Insurance Risk, Security, and Training/ Compliance (IST) fee will change to 9%. Questions? Contact AR@millerenv.com

8111 WESTCHESTER DRIVE STE 400
DALLAS TX 75225-6142

If any questions please reach out to :

CustomerSolutions.Mailbox@Sunoco.com

Invoice Number	6801738371
Invoice Date	07/27/2022
Payment Terms	Net 30 Days
Due Date	08/26/2022

Ship Date	07/27/2022	**Account Number**	1000045476
Ship From	S-MDSTREAM	**Tax Authority**	AL
Ship Via	SUNOCO, LLC	**Sales Person**	
Delivery Date	07/27/2022	**Please Remit To**	Sunoco,LLC P.O.Box 206458 Dallas,TX 75320-6458

Credit Memo/Invoice

Line No.	Item Description	Detailed Description	Billing Quantity	Unit Price	Amount
1	PCW Treatment	R20220 Service Date 07/20/2022	1,189	$0.25	$297.25
State Tax					$0.00
Invoice Total					$297.25

Late Payment Notification

A Late Payment charge will be made if Invoice is unpaid after Due Date

Sold To	Bill To	Business Location
1000045476	**1000045476**	**8000966801**
ENVIRONMENTAL PRODUCTS & SERV	ENVIRONMENTAL PRODUCTS & SERV	ENVIRONMENTAL PRODUCTS & SERV
5628 CLIFFORD CIRCLE	5628 CLIFFORD CIRCLE	5628 CLIFFORD CIRCLE
Birmingham AL 35210-0000	Birmingham AL 35210-0000	BIRMINGHAM Al 35210-0000

Recovery Report

Date Received by Sunoco	07/27/2022
PCW	
Gallons Received	1189.000
Gallons Recovered	1.000

THE OFF-SPEC FUEL OR PETROLEUM CONTACT WATER(PCW) RECEIVED FROM YOUR FACILITY WAS TREATED IN ACCORDANCE WITH ALL APPLICABLE STATE AND FEDERAL REGULATIONS. THE RECOVERY OF OFF-SPECIFICATION FUEL IS ADDRESSED IN USEPA'S RCRA PERMIT POLICY COMPENDIUM BY DOCUMENT NUMBERS 9441.1986 (19),(22),(95) J AND 9442.1985(01). IN SUMMARY, OFF-SPECIFICATION OR CONTAMINATED COMMERCIAL CHEMICAL PRODUCTS THATARE BURNED FOR ENERGY RECOVERY ARE NOT SOLID WASTES (AND THUS NOT HAZARDOUS WASTES) IF THEY ARE THEMSELVES FUELS. ALSO, RCRA REGULATIONS(261.2) (C) (3) INDICATE MATERIALS CONTAINING A COMMERCIAL PRODUCT INTENDED FOR RECLAMATION ARE EXCLUDED AS A SOLID WASTE, THUS NOT A HAZARDOUS WASTE.

Sunoco LLC

2700 Ishkooda-Wenonah Road
Birmingham, AL 35211-5705

Plant Use Only	
R # 20220	Date: 7·20·2022
Received by R:	Brandon McGuire
T #	Date:
Received by T:	

AGREEMENT - RECEIPT OF PRODUCT BY SUNOCO LLC

SOURCE OF PRODUCT

Facility Name: Multiple locations
Site Address:
City State: Zip
Phone: ( )
Fax: ( )
Contact:

BILLING INFORMATION

Customer Name: MILLER ENVIRONMENTAL GROUP
Billing Address: 5628 CLIFFORD CIR
City BIRMINGHAM State: AL Zip 35210
Phone: (205) 467-0319
Fax: (205) 467-0987
Contact: Nathan Bortram

PRODUCT INFORMATION

Please complete all information:

Tank Number 5757
Gallons 1189

Type of Product: *(Circle one)* **PCW** **Sludge** **Petroleum** **TMIX**
(If Sludge, further identify as): **Gas** **Diesel** **Other**

- The term petroleum contaminated waters ("PCW") means waters containing unused petroleum products and includes tank draw waters, tank cleaning waters/sludge, etc,
- Product containing materials such as fuel additives, pipeline lube or with greater than 5% ethanol are not considered PCW and special approval is required prior to shipment and acceptance.

AGREEMENT

(Additional terms and conditions on reverse side)

This document evidences the delivery by the company identified below ("Customer") and receipt by Sunoco LLC of PCW, sludge, petroleum transmix, or other product of the type and amount described above in the Product Information box. Customer acknowledges and agrees to the additional terms and conditions on the back of this form, and acknowledges receipt of a copy of the same.

NAME OF COMPANY: MILLER ENVIRONMENTAL GROUP
(Print Name of Company)

BY:
(Signature of Company Representative)

NAME: MARCUS [illegible]
(Print Name of Person Signing)

TITLE: EQUIPMENT OPERATOR.
(Print Title of Person Signing)

DATE: 7/20, 20 22

1/22479958.8

5628 Clifford Circle
Birmingham, AL 35210

Phone: (205) 467-0319
Fax: (205) 467-0987

July 26, 2022

Mr. Darral Kirby
Poly, Inc.
223 Aquarius Drive, Suite 116
Birmingham, AL 35209

RE: 8-Hour High Vacuum Extraction Event #15
RJ's Service Station
16051 U.S. Highway 431
Glencoe, AL
MEG Project No. AL24220174

Dear Mr. Kirby:

Miller Environmental Group, Inc. (MEG) is pleased to provide this summary of the High Vacuum Extraction (HVE) event conducted on July 18, 2022, at the referenced location above. Below is a summary of the technology, as well as the results of the actual event.

Technology

HVE involves the extraction of subsurface vapors and liquids via a monitoring well or recovery well. This is accomplished by applying high levels of vacuum to the extraction point. To eliminate mounding of the water table, a drop tube is inserted in the well to the static water level depth. The applied vacuum and airflow extracted from the well is pulled through this drop tube. As the water table attempts to mound due to the application of vacuum, the liquids are "slurped" through the drop tube. This slurping effectively maintains the static conditions of the water table while the elevated vacuum is applied to the well during the event. The slurping process also helps liberate contaminants from the smear zone as a result of capillary pressure. In order to minimize any change to the current smear zone associated with the site, seasonal water level is analyzed. Once the extraction process is underway, the inlet of the drop tube assembly is slowly lowered to a predetermined depth. Theoretically the drop tube can be lowered to the maximum historical water level observed for each extraction well. This drawdown below the static water level depresses the water table and creates a cone of influence, which maximizes the efficiency of the high vacuum process.

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Occasionally, fresh air is introduced at the well surface to increase the airflow and enhance the liquid removal rate. To accurately record the actual removal rate from the well, an airflow gauge is mounted on the well head to measure the amount of fresh air that is introduced. This extra fresh air is subtracted from the total flow calculated for each extraction well. Additionally, a set of two vacuum gauges are installed on the well head assembly; one on the drop tube assembly (well head vacuum), and one on the well casing (influence vacuum). If fresh air is introduced at the well head, the influence vacuum reading will be artificially lower than the actual applied vacuum because the inlet for fresh air is adjacent to this vacuum gauge port.

During the extraction process, the combined air and liquids are transferred to a 3,000-gallon capacity vacuum truck via a manifold mounted on the portable thermal oxidation treatment system where the liquids are separated using the vacuum truck as the knockout tank. The hydrocarbon vapors are transferred to the off-gas thermal oxidation system (when necessary to meet air discharge requirements) and are incinerated in the ThermOx® unit at 1,400-1,500°Fahrenheit (F). After thorough destruction of the contaminants in the air stream, the clean air is discharged into the atmosphere.

Calculations

During the HVE event, measurements are collected of both the influent and effluent flow rates, the concentrations of the vapors removed (before off-gas treatment), and the off-gas treatment system concentrations. These measurements are used to calculate the removal rates and the off-gas emission rates. These flow rates are measured using a pitot tube-type flow meter. Before each event, these flow assemblies are calibrated to ensure an accurate flow measurement. A separate flow rate is calculated for each influent well (if more than one well is connected), as well as for any additional fresh air that is introduced into the influent stream. These individual flow rates are combined to achieve the total flow and velocity derived from the extraction points. Because of the extremely high concentrations involved with an HVE event, additional quench air may be added to the vapor stream, just before entering the ThermOx® unit. An additional pitot tube assembly is installed at the inlet of the ThermOx® unit and is used to measure the total flow. Combined with the off-gas concentration readings, this total flow rate is used to calculate the destruction efficiency of the system.

Results

Prior to the commencement of the HVE event, an oil/water interface probe was used to measure the depth to product (if present) and depth to water in wells MWR-4D, MW-14D, RW-1, and RW-2. Separate phase hydrocarbons (“free product”) were not detected in any of the measured wells prior to performing the HVE event. Once static water levels were established, the system was connected to MWR-4D, MW-14D, RW-1, and RW-2. At each extraction point, a drop tube was positioned at the static fluid level, and once the ThermOx® unit reached its required operating temperature (1,400-1,500°F), the inlet flow valve was opened for the wells. During the HVE event at 16051 U.S. Highway 431, vacuum was applied to MWR-4D, MW-14D, and RW-2

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at 0600 hours, and RW-1 at 0615 hours. The drop tube assemblies were lowered to approximately one foott from the bottom of each well, creating a cone of influence in the subsurface around the wells. Air flow readings from the extraction points are presented on **Table 1** and shown on **Chart 1**.

During this event, 1.65 pounds of hydrocarbons were removed via vapor phase (equivalent to 0.27 gallons of gasoline), which brings the cumulative total for 15 events to 167.39 pounds of hydrocarbons removed (equivalent to 27.17 gallons of gasoline). A summary of the total hydrocarbon recovery rate is included on **Table 1**. Throughout the event, air concentration measurements were recorded periodically from both the influent and effluent sample ports. The measurements were recorded and compiled into the HVE field monitoring log, and additional calculations were made to determine the hydrocarbon loading rate. The total off-gas discharge (to the atmosphere) was 0.0 pounds of hydrocarbons, thus yielding an average 100% destruction rate by the ThermOx® unit.

Once the HVE event was complete, a second round of water level measurements was recorded. All wells connected to the system showed a change in water levels, with noticeable water table drawdown readings. During this event, 47 gallons of gas/water mixture were removed and retained in the vacuum truck tank. The gas/water mixture was transported by MEG to Sunoco LLC in Birmingham, AL for recycling. A copy of the Bill of Lading is attached.

Thank you for the opportunity to provide our services. If you have questions, please feel free to contact me at 205-467-0319.

Sincerely,

MILLER ENVIRONMENTAL GROUP, INC.

Nathan Burttram
Branch Manager

Enclosures: Table 1 – HVE Field Monitoring Data
Chart 1 – Recovery Flow Rates
Bill of Lading

Tables

MILLER ENVIRONMENTAL GROUP INC.

TABLE 1 - MEG HVE MONITORING DATA

Date:	July 18, 2022	Site Name:		RJ's Service Station	MEG Job #:	AL24220174	MEG Personnel	PID or FID make/model
Event #:	15	Site Address:		16051 U.S. Highway 431, Glencoe, AL	Consultant:	Poly, Inc.	Jackson/Cunningham	MiniRAE 3000

SYSTEM #1

Time of Day	Interval of Time (minutes)	Vac Truck Applied Vac (in. Hg)	Applied Vacuum, Well Head Flow, and Bleed Air at Extraction Well(s) (Recovery Flow Rates presented on Chart 1)												Dilution Air Magnehelic			Process Air Stream Magnehelic			Total Flow Transmitter Magnehelic			Combined Air Influent PID (ppm)	Total Hydrocarbon Loading Rate (lbs/hr)	Total Hydrocarbons Removed (gal)	Total Hydrocarbon Removed (lbs)	**Cumulative Total Hydrocarbons Removed (lbs)**	ThermOx Temp (°F)	Digital Flow Recorder (scfm)	Effluent PID (ppm)	Destruction Efficiency (%)	Hydrocarbon Emission Rate (lbs/hr)	Total Hydrocarbons Discharged (lbs)	**Cumulative Total Hydrocarbons Discharged (lbs)**
			on at 0600			on at 0600			on at 0600			on at 0615																								
			MW-14D			MWR-4D			RW-2			RW-1																								
			in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	in.Hg	cfm	cfm	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)	Diff. Press. (in.H_2O)	Velocity (fpm)	Flow (scfm)												
0600	--	18	16	255	5	16	255	5	16	255	5	--	--	--	0.2	1800	353	0.01	780	153	0.7	3350	658	14	0.16	--	--	--	1419	658	0	100.0	0.000	0.000	0.000
0615	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	19	0.18	0.01	0.04	0.04	1426	550	0	100.0	0.000	0.000	0.000
0630	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	31	0.29	0.01	0.07	0.12	1416	550	0	100.0	0.000	0.000	0.000
0645	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	37	0.34	0.01	0.09	0.20	1421	550	0	100.0	0.000	0.000	0.000
0700	15	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	49	0.45	0.02	0.11	0.32	1414	550	0	100.0	0.000	0.000	0.000
0730	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	52	0.48	0.04	0.24	0.56	1424	550	0	100.0	0.000	0.000	0.000
0800	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	41	0.38	0.03	0.19	0.75	1417	550	0	100.0	0.000	0.000	0.000
0830	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	27	0.25	0.02	0.13	0.87	1410	550	0	100.0	0.000	0.000	0.000
0900	30	18	14	191	5	14	191	5	14	191	5	14	191.2	5	0.0	0	0	0.01	780	153	0.5	2800	550	25	0.23	0.02	0.12	0.99	1420	550	0	100.0	0.000	0.000	0.000
1000	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	20	0.19	0.03	0.19	1.17	1424	550	0	100.0	0.000	0.000	0.000
1100	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	17	0.16	0.03	0.16	1.33	1420	550	0	100.0	0.000	0.000	0.000
1200	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	15	0.14	0.02	0.14	1.47	1426	550	0	100.0	0.000	0.000	0.000
1300	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	11	0.10	0.02	0.10	1.57	1421	550	0	100.0	0.000	0.000	0.000
1400	60	18	14	191	5	14	191	5	14	191	5	14	191	5	0.0	0	0	0.01	780	153	0.5	2800	550	8	0.07	0.01	0.07	**1.65**	1426	550	0	100.0	0.000	0.000	**0.000**
				196 avg			196 avg			196 avg			191 avg						153 avg								**0.27 Total**				558 avg		**100.0 avg**		

Comments

0600: MW-14D, MWR-4D, and RW-2 online; drop tubes set 1 foot off the bottom of the wells.
0615: RW-1 online; drop tube set 1 foot off the bottom of the well.
1400: End of HVE event.

Monitoring Well Gauging Data

Well Number	Before Event			Influence Vacuum (in. H_2O)	After Event			Water Level Change
	DTP	DTW	Prod. (ft)		DTP	DTW	Prod. (ft)	
RW-1	--	30.15	--		--	38.46	--	-8.31
RW-2	--	31.64	--		--	34.22	--	-2.58
MWR-4D	--	22.65	--		--	29.54	--	-6.89
MW-14D	--	29.43	--		--	31.13	--	-1.70

Monitoring Well Gauging Data

This Event's Totals

Total Pounds of Hydrocarbon Removed This Event	1.65
Equivalent Gallons of Hydrocarbons Removed This Event	0.27
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	47
Gallons of Separate Phase Product in Vac Truck Tank at End of Event	0
Total Operating Time (Hours)	8

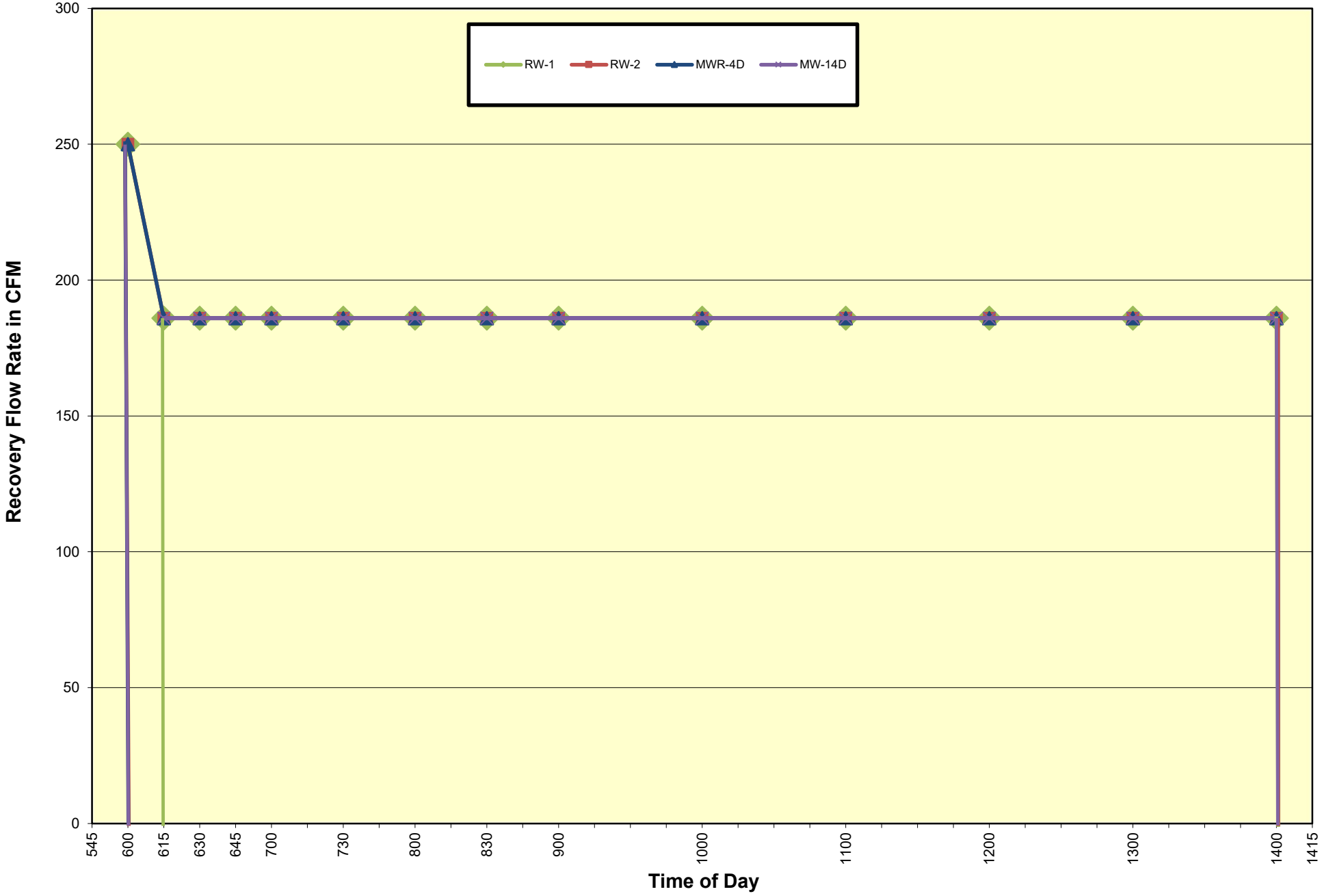
Cumulative (to date) Totals (15 events)

Total Pounds of Hydrocarbons Removed	167.39
Equivalent Gallons of Hydrocarbons Removed	27.17
Total Gallons of Liquid Removed (Gasoline/Water Mixture)	1,913

Charts

MILLER ENVIRONMENTAL GROUP INC.

Chart 1: Well Head Flow Rates
HVE Event 15: RJ's Service Station, Glencoe, AL
Performed by MEG on July 18, 2022



Shipping Documents

MILLER ENVIRONMENTAL GROUP INC.

Please print or type

BILL OF LADING

Generator EPA ID #

1. Document No. BIR6792

2. Page 1 of 1

3. Generator's Name and Mailing Address
Greg Johnson
P.O. Box 151
Godsden AL. 35209.

4. Generator's Phone (205) 758-1637

Site Address
RJ's Service Station
16051 US Hwy 11/31 South
Glencoe AL 35905

5. Transporter 1 Company Name: Miller Environmental Group, Inc

6. EPA ID #: NYD986908085

A. State Transporter's ID

B. Transporter 1 Phone: 800-394-8606

7. Transporter 2 Company Name

8. EPA ID #

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address
Sunoco LLC
3700 Ishkooda-Wenonah Rd
Birmingham AL 35211
HM

10. EPA ID #: ALD000817072

E. State Facility's ID

F. Facility's Phone: 205-925-6600

	11. Shipping Name	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a.	Non RCRA, Non DOT, Liquid, N.O.S. (Petroleum Contact Water)	1	TT	47	G
b.					
c.					
d.					

GENERATOR

G. Additional Descriptions for Materials Listed Above

15. Special Handling Instructions and Additional Information
Job # AL2422017A

No Approval Number Received.

16. GENERATOR'S CERTIFICATION: I hereby certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. The materials described on this document are not subject to federal uniform hazardous waste manifest requirements.

Printed/Typed Name	Signature	Date Month	Day	Year
Kelly Lee	Kelly Lee	7	18	22

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
		7	18	22

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the materials covered by this bill of lading except as noted in Item 19.

Printed/Typed Name	Signature	Date Month	Day	Year

22

BILL OF LADING

227 Sandy Springs Place
Suite D-122
Atlanta, Georgia 30328-5918
Phone 404 256 0667
Fax 404 256 0668

June 18, 2025

Brent Heard
Poly, Inc.
117 Gemini Circle, Suite 416
Birmingham, AL 35209

Subject: 8-Hour Multi-Phase Extraction Event
RJ's Service Station
16051 US Highway 431 South
Glencoe, AL
Project No. AL062507

Dear Mr. Heard:

Brown Remediation, Inc. is pleased to provide you with this report of our Multi-Phase Extraction (MPE) service conducted at the subject facility on June 4, 2025.

Site monitoring wells MW-3, MW-4D, MW-14D, RW-1, and RW-2 were gauged before the MPE event with an oil-water interface probe to determine the static depth to groundwater and the presence of light non-aqueous phase liquid (LNAPL). Detectable levels of LNAPL were not observed in monitoring well wells measured during the initial gauging event.

MW-3, MW-4D, MW-14D, RW-1, and RW-2 were used as extraction wells during the MPE event. A drop tube was connected to the vacuum port of the MPE unit before lowering it below the static groundwater level in each extraction well. Vacuum was applied to the drop tube, thereby creating a vacuum influence, which can be measured in adjacent monitoring wells.

Following the MPE event, all wells were again gauged to determine the new static depth to groundwater and the presence of LNAPL. The differences in water levels before and after the event were recorded. No LNAPL was detected in any of the wells measured.

Following is a summary of the site data recorded during the event.

MPE Event Gauging Data Summary

Well	Before Event			Influence Vacuum	After Event			Change in
Number	DTP (ft)	DTW (ft)	Prod.(ft)	Time: CST 15:00	DTP (ft)	DTW (ft)	Prod.(ft)	Elevation (ft)
MW-3		8.84		-6.5" Hg		11.70		-2.86
MW-4D		7.15		-6.7" Hg		10.51		-3.36
MW-14D		6.02		-7.2" Hg		6.64		-0.62
RW-1		7.86		-7.2" Hg		9.39		-1.53
RW-2		8.32		-7.1" Hg		10.05		-1.73

Calculated values for carbon, methane, and hydrocarbon recorded during the MPE event are presented below. In addition, the amount of recovered groundwater, propane consumption, and total MPE event time are noted.

Event Totals	
Total Carbon (lbs)	3.58
Total Methane (lbs)	0.46
Total Hydrocarbon (lbs)	11.94
Equiv. Hydrocarbons (gallons)	1.93
Total Liquid (gallons)	1350
Total Propane (gallons)	35.0
Total Event Time (hours)	8.0

Cumulative Totals	
Total Carbon (lbs)	41.99
Total Methane (lbs)	5.62
Total Hydrocarbon (lbs)	140.06
Equiv. Hydrocarbons (gallons)	22.69
Total Liquid (gallons)	5918
Total Propane (gallons)	400.0
Events	12

Extracted groundwater was transported to Sunoco, LLC located in Birmingham, Alabama, by Brown Remediation, Inc. A copy of the manifest is attached.

We appreciate the opportunity to provide you with these services. Please do not hesitate to call if you have any questions.

Sincerely,

Brown Remediation, Inc.

Thomas Brown

Thomas Brown
Director of Operations

Attachments: Site Map
MPE Event Data Summary
Field Data Sheet
Flow and Hydrocarbon Removal Rates
MPE Technology Description and Calculations
Disposal Manifest

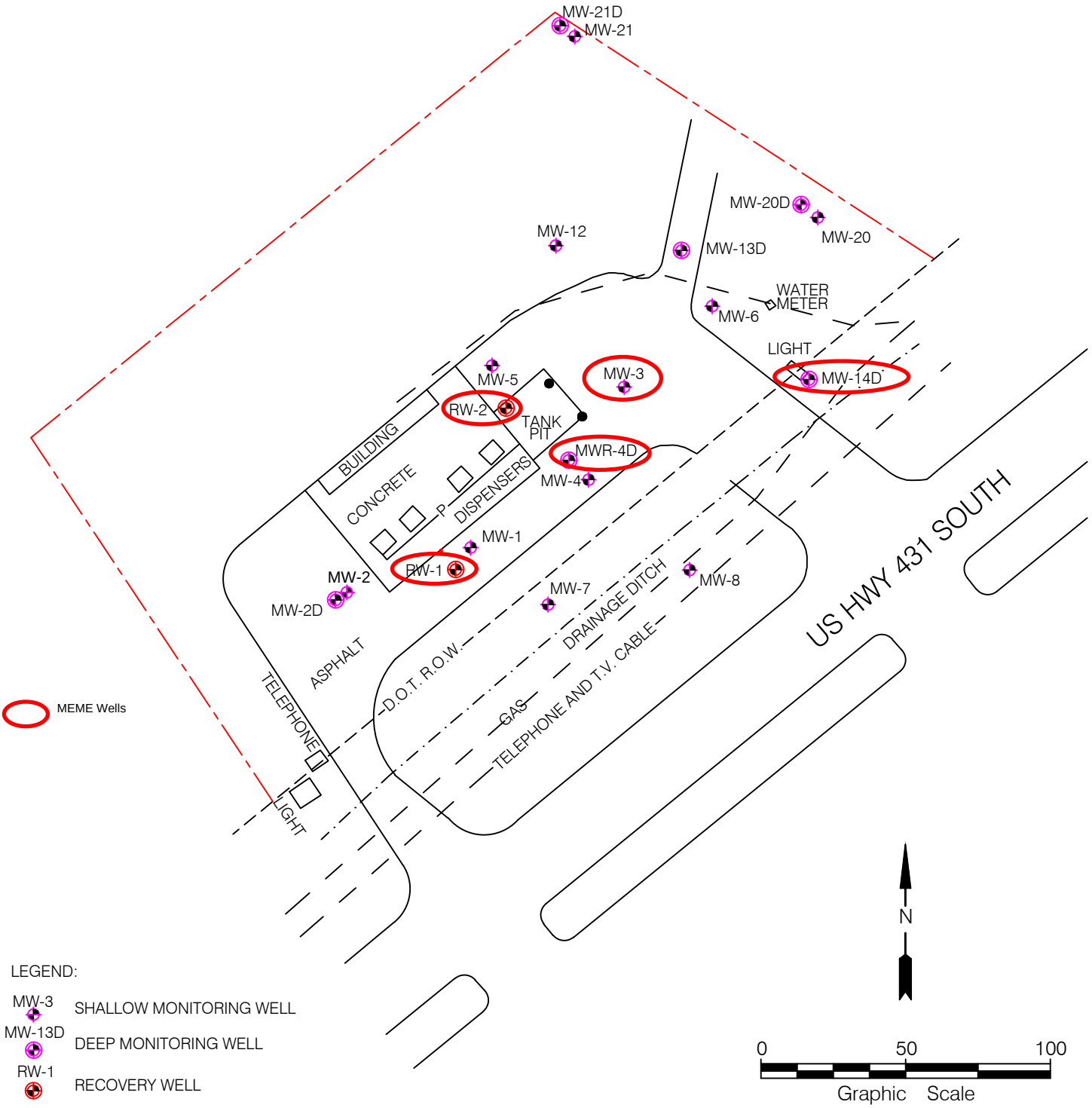


FIGURE No. 1	SITE MAP PROJECT NO. 8523047, CP-63 (11-13-2023) RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: DRAWN BY: JDP DATE: NOVEMBER 2023 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. (AL. / FL. / GA.) ARCHITECT CA-0480 / AA-C001551 / 001118 ENGINEER CA-78-E / CA-1818 / 001118

MPE Event Data Summary

RJ's Service Station
16051 US Highway 431 South, Glencoe, AL
Operator Name: Michael Gammage
Date: June 4, 2025
Project # AL062507

Tiime CST	Time Interval (minutes)	Applied Well Head Vacuum					Addl. Ambient Air	Total Velocity	Total Effluent Flow	Well Field Flow	Pump Effluent Temp.	Total Influent FID	Filtered (CH_4) FID	Hydrocarbon Compounds		Before off-gas treatment				Stack Gas Temp.	Effluent Conc. Data	Total Flow Rate	After off-gas treatment		
		MW-3	MW-4D	MW-14D	RW-1	RW-2										Total Methane Removed	Total Carbon Removed	Total Hydrocarbon Removed					Carbon Emission Rate	Equiv. Hydrocarbon Rate	Destruction Efficiency Rating %
		(in/Hg)	(in/Hg)	(in/Hg)	(in/Hg)	(in/Hg)	(SCFM)	ft/sec.	(SCFM)	(SCFM)	(F^0)	(PPMv)	(PPMv)	(PPMv)	(mg/m3)	(lbs./ reading)	(lbs./ reading)	(lbs./ reading)	(gal./ reading)	(F^0)	(PPMv)	(SCFM)	(lbs./ reading)	(lbs./ reading)	
7:30	0 min.	11.0	11.0	11.0	11.0	11.0	49.5	15.3	183.9	109.4	97.0	742	77	665	1,108	0.000	0.00	0.00	0.000	823.0		183.88			
8:00	30 min.	11.0	11.0	11.0	11.0	11.0	45.5	14.7	177.2	106.7	115.0	1,018	98	920	1,533	0.021	0.15	0.51	0.082	862.0		177.17			
8:30	30 min.	11.0	11.0	11.0	11.0	11.0	45.3	15.0	180.2	109.9	132.0	1,153	113	1,040	1,733	0.025	0.18	0.58	0.095	897.0	4.20	180.21	0.0007	0.0024	99.60%
9:00	30 min.	11.0	11.0	11.0	11.0	11.0	42.9	14.9	179.3	111.4	150.0	1,266	135	1,131	1,885	0.030	0.19	0.63	0.103	953.0		179.34			
9:30	30 min.	11.0	11.0	11.0	11.0	11.0	42.8	14.9	178.8	111.0	154.0	1,489	139	1,350	2,250	0.030	0.23	0.75	0.122	964.0		178.75			
10:00	30 min.	11.0	11.0	11.0	11.0	11.0	42.6	15.0	180.1	112.5	157.0	1,667	145	1,522	2,537	0.032	0.26	0.85	0.139	986.0		180.09			
10:30	30 min.	11.0	11.0	11.0	11.0	11.0	42.5	15.2	183.0	115.5	161.0	1,650	156	1,494	2,490	0.035	0.26	0.85	0.138	990.0		183.00			
11:00	30 min.	11.0	11.0	11.0	11.0	11.0	40.4	15.2	182.7	117.4	163.0	1,611	150	1,461	2,435	0.034	0.25	0.83	0.135	998.0		182.70			
11:30	30 min.	11.0	11.0	11.0	11.0	11.0	40.3	15.2	182.6	117.2	164.0	1,590	141	1,449	2,415	0.032	0.25	0.83	0.134	998.0		182.56			
12:00	30 min.	11.0	11.0	11.0	11.0	11.0	40.3	15.3	184.1	118.8	165.0	1,530	142	1,388	2,313	0.032	0.24	0.80	0.129	999.0		184.12			
12:30	30 min.	11.0	11.0	11.0	11.0	11.0	38.1	15.3	184.0	120.9	166.0	1,505	138	1,367	2,278	0.031	0.24	0.78	0.127	1002.0		183.98			
13:00	30 min.	11.0	11.0	11.0	11.0	11.0	38.1	15.4	185.4	122.3	168.0	1,492	122	1,370	2,283	0.028	0.24	0.79	0.128	1001.0		185.38			
13:30	30 min.	11.0	11.0	11.0	11.0	11.0	35.8	15.4	184.8	124.0	172.0	1,451	119	1,332	2,220	0.027	0.23	0.77	0.124	1001.0		184.79			
14:00	30 min.	11.0	11.0	11.0	11.0	11.0	35.8	15.4	185.1	124.3	170.0	1,438	116	1,322	2,203	0.026	0.23	0.76	0.124	1000.0		185.08			
14:30	30 min.	11.0	11.0	11.0	11.0	11.0	33.3	15.4	185.2	126.9	169.0	1,396	112	1,284	2,140	0.025	0.22	0.74	0.120	997.0		185.23			
15:00	30 min.	11.0	11.0	11.0	11.0	11.0	33.4	15.4	185.4	127.0	168.0	1,367	105	1,262	2,103	0.024	0.22	0.73	0.118	995.0		185.38			
15:30	30 min.	11.0	11.0	11.0	11.0	11.0	33.4	15.4	185.5	127.1	167.0	1,349	101	1,248	2,080	0.023	0.22	0.72	0.117	992.0		185.52			
Average Reading:		**11.0**	**11.0**	**11.0**	**11.0**	**11.0**	**40.0**	**15.2**	**182.8**	**117.8**	**155.2**	**1394.9**	**124.1**	**Total Removed:**		**0.455**	**3.58**	**11.94**	**1.935**	**Total Lbs Discharged:**			0.00071	0.00236	99.60%

Comments
Poly Inc. was on site for the event.

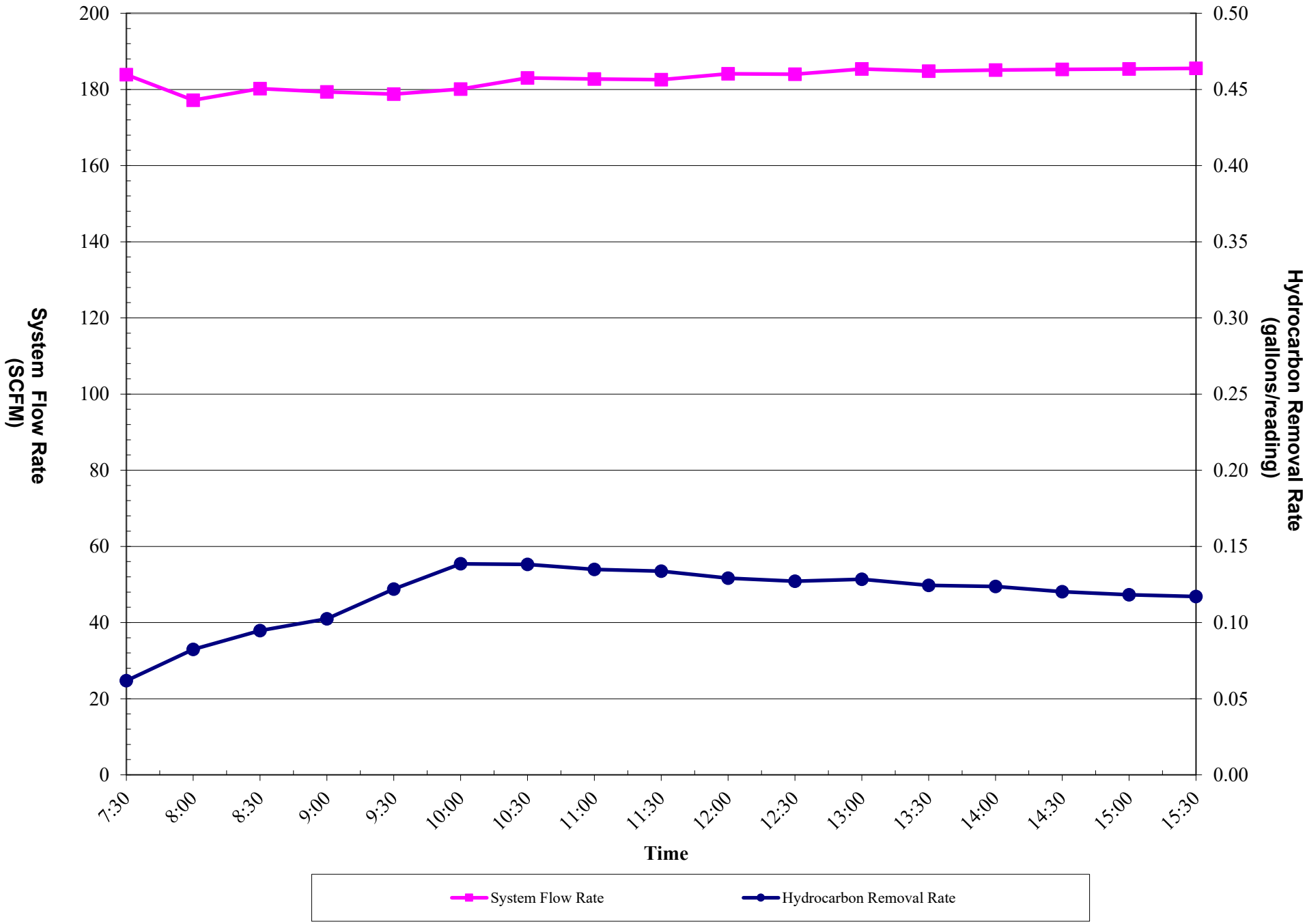
Field Data

RJ's Service Station
16051 US Highway 431 South, Glencoe, AL
Operator Name: Michael Gammage
Date: June 4, 2025
Project # AL062507

Response Ratio : 600
(Gas=600, Diesel=203, JetA=198)
Specific Gravity : 0.74
(Gas=0.74, Diesel=0.83, JetA=0.80)

			Dilution Stream		Pump Discharge Stream				Extraction Well #		MW-3	Extraction Well #		MW-4D	Extraction Well #		MW-14D	Extraction Well #		RW-1	Extraction Well #		RW-2	
LINE #	Time CST	Time Interval	Bleed Air Diff Press. ("WC)	Bleed Air Temp	Effluent Pressure (psi)	Manifold Vacuum ("Hg")	Effluent Separator Temp	Effluent Diff Press ("WC)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	LINE#
1	7:30	0.01	0.13	74	0.2	14	97	0.48	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	1
2	8:00	30	0.11	78	0.2	14	115	0.46	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	2
3	8:30	30	0.11	82	0.2	14	132	0.49	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	3
4	9:00	30	0.1	92	0.2	14	150	0.5	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	4
5	9:30	30	0.1	96	0.2	14	154	0.5	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	5
6	10:00	30	0.1	100	0.2	14	157	0.51	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	6
7	10:30	30	0.1	103	0.2	14	161	0.53	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	7
8	11:00	30	0.09	106	0.2	14	163	0.53	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	8
9	11:30	30	0.09	107	0.2	14	164	0.53	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	9
10	12:00	30	0.09	108	0.2	14	165	0.54	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	10
11	12:30	30	0.08	108	0.2	14	166	0.54	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	11
12	13:00	30	0.08	109	0.2	14	168	0.55	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	12
13	13:30	30	0.07	109	0.2	14	172	0.55	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	13
14	14:00	30	0.07	108	0.2	14	170	0.55	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	14
15	14:30	30	0.06	107	0.2	14	169	0.55	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	15
16	15:00	30	0.06	106	0.2	14	168	0.55	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	16
17	15:30	30	0.06	104	0.2	14	167	0.55	11	5	11	11	5	9	11	5	8	11	5	10	11	5	11	17
Average Reading:			0.09	99.82	0.20	14.00	155.18	0.52	11.00	5.00	11.00	11.00	5.00	9.00	11.00	5.00	8.00	11.00	5.00	10.00	11.00	5.00	11.00	

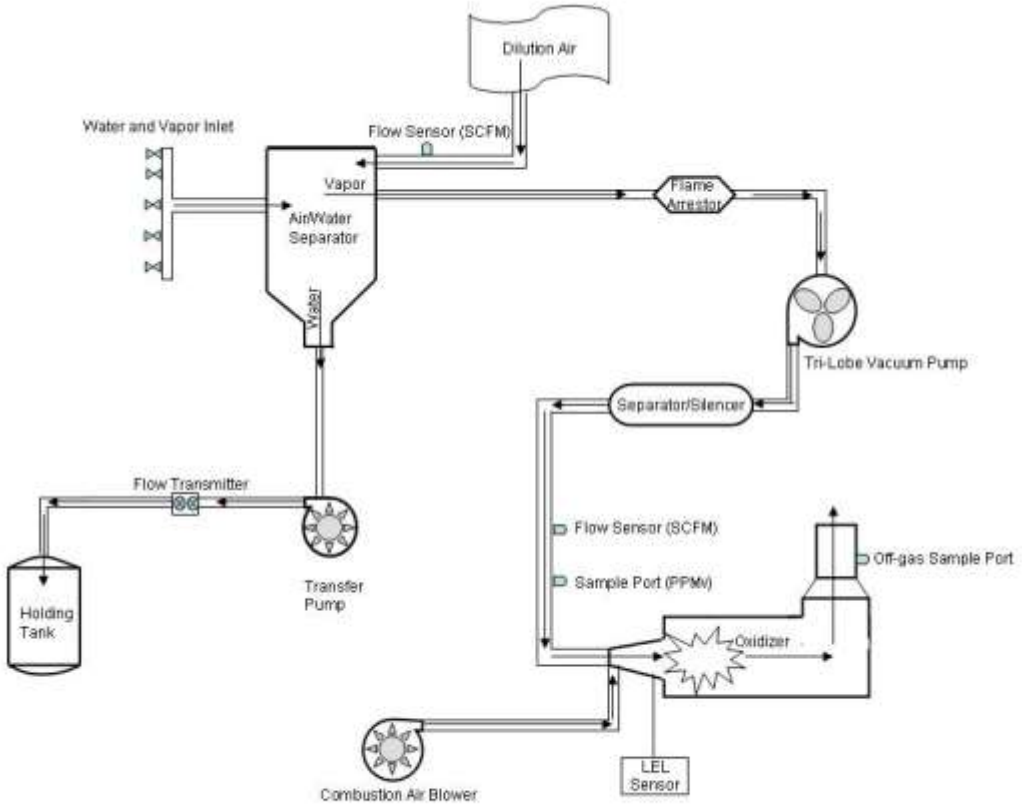
System Flow and Hydrocarbon Removal Rate



Multi-Phase Extraction Technology

Multi-phase extraction (MPE) systems remove vapors and liquids simultaneously from the subsurface. Ambient air (5 to 20 cubic feet per minute) is drawn down the casing of monitoring wells, across the groundwater interface, and back up a drop tube, providing the necessary lift to extract subsurface groundwater. An airflow gauge attached to a well head is used to measure the amount of ambient air, which is subtracted from the total flow. Additionally, vacuum gauges are used to measure the extraction vacuum, as well as the vacuum applied to the subsurface stratigraphy.

The extracted vapors and liquids are transferred to a mobile treatment system, where the liquids are separated and discharged into a storage tank for proper disposal. Soil vapors are transferred to a forced air thermal oxidation (ThOx) unit and incinerated at approximately 1,500 degrees Fahrenheit. The treated air is then discharged into the atmosphere. Following is a process flow diagram for the Brown Remediation, Inc. MPE system.



Summary of Calculations

During the MPE event, a total flow rate measurement of the process stream is taken on the discharge side of the vacuum extraction pump and before off-gas treatment. This measurement is performed using an averaging pitot tube (Dwyer DS-300) attached to a digital differential pressure sensor. This measurement is used to calculate the removal rates and the off-gas emission rates and is reported in actual cubic feet per minute. A separate flow rate is calculated for the extraction well field, as well as for any additional ambient air introduced into the influent stream. To determine the volume of hydrocarbon removed during the event, samples of the extracted vapors are collected from a sample port located before the vapor stream enters the ThOx unit. A second sample port located on the exhaust stack of the ThOx unit provides access for determining the destruction efficiency of the combustion process.

Concentration measurements are taken using a TVA-1000A flame ionization detector (FID) calibrated to methane. This FID instrument has a dynamic range of 0 to 50,000 parts per million (PPM) as methane, and 0 to 100,000 PPM as hydrocarbon. The concentration measurements of the process stream are made after the addition of ambient air at the phase separator and prior to the addition of combustion air at the oxidizer; however, the concentration of the process stream at the sample port exceed the dynamic range of the FID instrument. To accurately record the high concentrations commonly observed during an MPE event, a calibrated 10:1 dilution assembly is used to accurately dilute the sample. This dilution assembly, along with the FID instrument, is calibrated before the start of each event.

To account for naturally occurring methane present during a typical MPE event, two concentration measurements are taken. One unfiltered sample measures the total volatile organic compounds (VOCs) in the subsurface. The other sample is collected using an in-line activated carbon filter, which adsorbs the hydrocarbon compounds, leaving only methane. This methane-only result is then subtracted from the total VOC measurement for use in the mass hydrocarbon removal calculation. However, as with any FID instrument, the non-methane organic compound results are recorded as parts per million by volume (PPMv) as if the concentrations were equivalent to methane gas. A conversion from methane to hydrocarbon, and from volume to weight, is necessary to calculate the accurate hydrocarbon removal. By using the TVA-1000's factory-certified response ratio for various hydrocarbons, the measurements are converted to equivalent hydrocarbon in milligrams per liter (mg/L). For example, a TVA-1000 FID has an average response ratio of 600 PPMv per mg/L for unleaded gasoline and 200 PPMv per mg/L for diesel. Following is a summary of calculations.

Flow

$$Q = 128.8 \times K \times D \times SQRT((P \times dP) / (T + 460) \times Ss)$$

Where:

Q =	Flow expressed in Standard Cubic Feet per Minute (SCFM)
K =	Flow coefficient (provided by Dwyer Instruments, Inc.)
D =	Inside diameter of process line in inches
SQRT =	Square Root
P =	Static line pressure
dP =	Differential pressure expressed in inches of water column (WC)
T =	Temperature in degrees Fahrenheit (plus 460 equals degrees Rankine)
Ss =	Specific gravity at 60 degrees Fahrenheit

Conversion of Field Data (PPMv to mg/m^3)

C = (PPMv / R) x (1000 L / 1 m^3)

Where:

R = TVA response ratio supplied in The Foxboro Monitor, Volume 3, Issue 1A (600 PPMv / (mg/L) for gasoline and 200 PPMv / (mg/L) for diesel)

Hydrocarbon Loading Rate

M = Q x C x c

Where:

M = Contaminant loading rate (lbs/hr)

Q = Air flow rate (SCFM)

C = Contaminant concentration (mg/m^3)

c = (1m^3 / 35.31 ft) x (1 lb / 454 x 10^3) x (60 min / 1 hr) = 3.743 x 10^{-6}

Conversion of Pounds of Hydrocarbon to Equivalent Gallons

Equivalent Gallons = Ss x c

Where:

Ss = Specific gravity (0.74 = gasoline, 0.84 = diesel fuel)

c = 8.34 lbs/gallon

SUNOCO, LLC
DALLAS TX

If any questions please reach out to :
CustomerSolutions.Mailbox@Sunoco.com

Invoice Number	6804876229
Invoice Date	06/17/2025
Payment Terms	Net 30 Days
Due Date	07/17/2025

Ship Date	06/17/2025	**Account Number**	1000045969
Ship From	S-MDSTREAM	**Tax Authority**	GA
Ship Via	SUNOCO, LLC	**Sales Person**	
Delivery Date	06/17/2025	**Please Remit To**	Sunoco,LLC P.O.Box 206458 Dallas,TX 75320-6458

Credit Memo/Invoice

Line No.	Item Description	Detailed Description	Billing Quantity	Unit Price	Amount
1	JUN-2025 PCW Treatment	R26498A Project: AL062507 Manifest: 10997 Service Date 06/13/2025	1,350	0.3200	432.00 USD
State Tax					0.00 USD
Invoice Total					432.00 USD

Late Payment Notification

A Late Payment charge will be made if Invoice is unpaid after Due Date

Sold To	Bill To	Business Location
1000045969	**1000045969**	**8000894601**
BROWN REMEDIATION INC	BROWN REMEDIATION INC	BROWN REMEDIATION INC
227 SANDY SPRINGS PL STE D	227 SANDY SPRINGS PL STE D	227 SANDY SPRINGS PL STED122
Atlanta GA 30328-3849	Atlanta GA 30328-3849	ATLANTA Ga 30328-0000

Sunoco LLC

2700 Ishkooda-Wenonah Road
Birmingham, AL 35211-5705

Plant Use Only
R # 26498A Date: 6-13-25
Received by R:
T # Date:
Received by T:

AGREEMENT - RECEIPT OF PRODUCT BY SUNOCO LLC

SOURCE OF PRODUCT

Facility Name: RJ's Service Station
Site Address: 16051 US Highway 431 South
City Glencoe State: AL Zip
Phone: ( )
Fax: ( )
Contact:

BILLING INFORMATION

Customer Name: Brown Remediation
Billing Address: 227 Sandy Springs Pl. Ste. D-
City Atlanta State: GA Zip 30328
Phone: (404) 256-0667
Fax: (404) 256-0668
Contact: Tom Brown

PRODUCT INFORMATION

Please complete all information:

Tank Number 1
Gallons 1350

Type of Product: *(Circle one)* (PCW) Sludge Petroleum TMIX
(If Sludge, further identify as): Gas Diesel Other

- The term petroleum contaminated waters ("PCW") means waters containing unused petroleum products and includes tank draw waters, tank cleaning waters/sludge, etc,
- Product containing materials such as fuel additives, pipeline lube or with greater than 5% ethanol are not considered PCW and special approval is required prior to shipment and acceptance.

AGREEMENT

(Additional terms and conditions on reverse side)

This document evidences the delivery by the company identified below ("Customer") and receipt by Sunoco LLC of PCW, sludge, petroleum transmix, or other product of the type and amount described above in the Product Information box. Customer acknowledges and agrees to the additional terms and conditions on the back of this form, and acknowledges receipt of a copy of the same.

NAME OF COMPANY: Brown Remediation
(Print Name of Company)
BY: Michael Gemmace
(Signature)
NAME: Michael Gemmace
(Print Name of Person Signing)
TITLE: Operator
(Print Title of Person Signing)
DATE: 6-13, 20 25

1 3247958.8

227 Sandy Springs Place
Suite D-122
Atlanta, Georgia 30328-5918
Phone 404 256 0667
Fax 404 256 0668

Non-Hazardous Waste Manifest

Manifest No.: 10997 Project No.: AL0C2507 Quantity in U.S. Gallons: 1350

Section 1: Generator

Company Name: RJ's Service Station Location:
Address: 16051 US Hwy 43 South Address:
City: Glencoe State: AL ZIP: City: State: ZIP:
Phone No.: Fax No.: Phone No.: Fax No.:
Description of Waste: PCW

This is to certify that the above-named material is properly described and is in proper condition for transportation according to the applicable regulations of the Department of Transportation. I further certify that the above-named material is not a hazardous waste as defined by 40 CFR, Parts 261 and 279, or any applicable federal, state, or local laws.

Authorized Agent Signature Date: 6-13-2025

Section 2: Transporter

Primary

Company Name: Brown Remediation, Inc
Address: 227 Sandy Springs Place
Suite D-122
City: Atlanta State: GA ZIP: 30328
Phone No.: (404) 256-0667 Fax No.: (404) 256-0668
Driver Name: Michael Gammage
Truck No.: 7 Vehicle Tag: P4007B

Driver Signature Date: 6-13-2025

Secondary

Company Name:
Address:
City: State: ZIP:
Phone No.: Fax No.:
Driver Name:
Truck No.: Vehicle Tag:

Driver Signature Date

Section 3: Destination

Company Name: Sunoco
Address:
City: Birmingham State: AL ZIP:
Phone No.: Fax No.:

I hereby certify that the above material has been accepted, and to the best of my knowledge, the foregoing is true and accurate.

Authorized Agent Signature Date: 6-13-2025

R# 24498A

White – Destination Yellow – Brown Remediation

227 Sandy Springs Place
Suite D-122
Atlanta, Georgia 30328-5918
Phone 404 256 0667
Fax 404 256 0668

July 17, 2025

Brent Heard
Poly, Inc.
117 Gemini Circle, Suite 416
Birmingham, AL 35209

Subject: 8-Hour Multi-Phase Extraction Event
RJ's Service Station
16051 US Highway 431 South
Glencoe, AL
Project No. AL072505

Dear Mr. Heard:

Brown Remediation, Inc. is pleased to provide you with this report of our Multi-Phase Extraction (MPE) service conducted at the subject facility on July 9, 2025.

Site monitoring wells MW-3, MW-4D, MW-14D, RW-1, and RW-2 were gauged before the MPE event with an oil-water interface probe to determine the static depth to groundwater and the presence of light non-aqueous phase liquid (LNAPL). Detectable levels of LNAPL were not observed in wells measured during the initial gauging event.

MW-3, MW-4D, MW-14D, RW-1, and RW-2 were used as extraction wells during the MPE event. A drop tube was connected to the vacuum port of the MPE unit before lowering it below the static groundwater level in each extraction well. Vacuum was applied to the drop tube, thereby creating a vacuum influence, which can be measured in adjacent monitoring wells.

Following the MPE event, all wells were again gauged to determine the new static depth to groundwater and the presence of LNAPL. The differences in water levels before and after the event were recorded. No LNAPL was detected in any of the wells measured.

Following is a summary of the site data recorded during the event.

MPE Event Gauging Data Summary

Well	Before Event			Influence Vacuum	After Event			Change in
Number	DTP (ft)	DTW (ft)	Prod.(ft)	Time: CST 14:30	DTP (ft)	DTW (ft)	Prod.(ft)	Elevation (ft)
MW-3		15.91		-6.6" Hg		18.95		-3.04
MW-4D		18.21		-6.6" Hg		23.62		-5.41
MW-14D		23.21		-7.1" Hg		25.28		-2.07
RW-1		21.92		-7.2" Hg		22.81		-0.89
RW-2		20.64		-7.1" Hg		21.20		-0.56

Calculated values for carbon, methane, and hydrocarbon recorded during the MPE event are presented below. In addition, the amount of recovered groundwater, propane consumption, and total MPE event time are noted.

Event Totals	
Total Carbon (lbs)	2.97
Total Methane (lbs)	0.36
Total Hydrocarbon (lbs)	9.92
Equiv. Hydrocarbons (gallons)	1.61
Total Liquid (gallons)	800
Total Propane (gallons)	35.0
Total Event Time (hours)	8.0

Cumulative Totals	
Total Carbon (lbs)	44.96
Total Methane (lbs)	5.98
Total Hydrocarbon (lbs)	149.98
Equiv. Hydrocarbons (gallons)	24.30
Total Liquid (gallons)	6718
Total Propane (gallons)	435.0
Events	13

Extracted groundwater was transported to Sunoco located in Birmingham, Alabama, by Brown Remediation, Inc. A copy of the manifest is attached.

We appreciate the opportunity to provide you with these services. Please do not hesitate to call if you have any questions.

Sincerely,

Brown Remediation, Inc.

Thomas Brown

Thomas Brown
Director of Operations

Attachments: Site Map
MPE Event Data Summary
Field Data Sheet
Flow and Hydrocarbon Removal Rates
MPE Technology Description and Calculations
Disposal Manifest

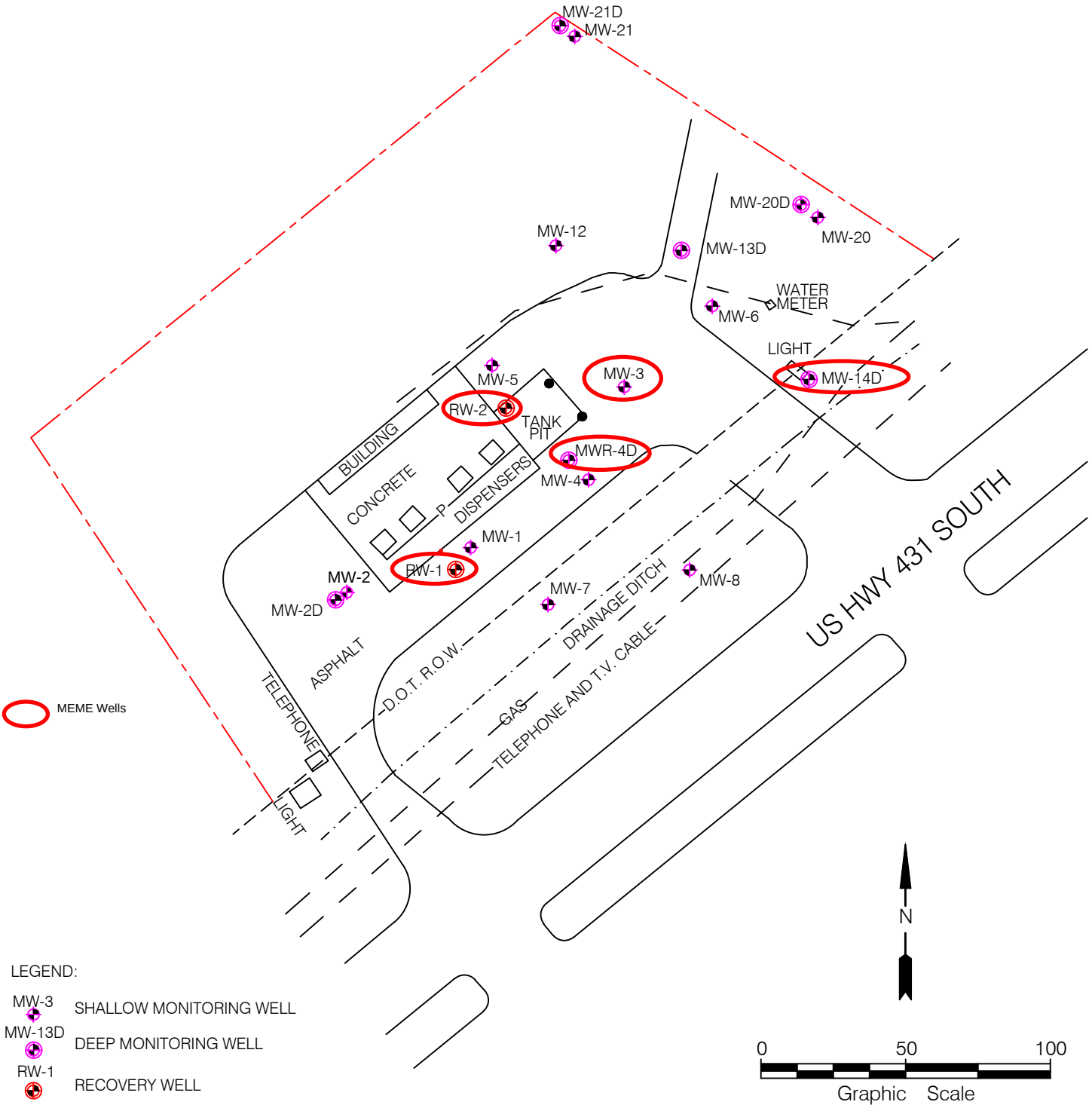


FIGURE No. 1	SITE MAP PROJECT NO. 8523047, CP-63 (11-13-2023) RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: DRAWN BY: JDP DATE: NOVEMBER 2023 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. (AL. / FL. / GA.) ARCHITECT CA-0480 / AA-C001551 / 001118 ENGINEER CA-78-E / CA-1818 / 001118

MPE Event Data Summary

RJ's Service Station
16051 US Highway 431 South, Glencoe, AL
Operator Name: Michael Gammage
Date: July 9, 2025
Project # AL072505

Tiime CST	Time Interval (minutes)	Applied Well Head Vacuum					Addl. Ambient Air	Total Velocity	Total Effluent Flow	Well Field Flow	Pump Effluent Temp.	Total Influent FID	Filtered (CH_4) FID	Hydrocarbon Compounds		Before off-gas treatment				Stack Gas Temp.	Effluent Conc. Data	Total Flow Rate	After off-gas treatment		
		MW-3	MW-4D	MW-14D	RW-1	RW-2										Total Methane Removed	Total Carbon Removed	Total Hydrocarbon Removed					Carbon Emission Rate	Equiv. Hydrocarbon Rate	Destruction Efficiency Rating %
		(in/Hg)	(in/Hg)	(in/Hg)	(in/Hg)	(in/Hg)	(SCFM)	ft/sec.	(SCFM)	(SCFM)	(F^0)	(PPMv)	(PPMv)	(PPMv)	(mg/m3)	(lbs./ reading)	(lbs./ reading)	(lbs./ reading)	(gal./ reading)	(F^0)	(PPMv)	(SCFM)	(lbs./ reading)	(lbs./ reading)	
7:00	0 min.	11.0	11.0	11.0	11.0	11.0	45.8	15.6	187.2	116.4	100.0	672	48	624	1,040	0.000	0.00	0.00	0.000	804.0		187.17			
7:30	30 min.	11.0	11.0	11.0	11.0	11.0	43.7	15.2	182.6	113.8	105.0	849	61	788	1,313	0.014	0.13	0.45	0.073	805.0		182.58			
8:00	30 min.	11.0	11.0	11.0	11.0	11.0	41.6	14.7	177.3	110.7	114.0	961	78	883	1,472	0.017	0.15	0.49	0.079	808.0	3.90	177.33	0.0006	0.0022	99.56%
8:30	30 min.	11.0	11.0	11.0	11.0	11.0	41.5	14.6	175.8	109.3	124.0	1,174	104	1,070	1,783	0.022	0.18	0.59	0.095	809.0		175.80			
9:00	30 min.	11.0	11.0	11.0	11.0	11.0	41.3	14.3	172.2	105.9	162.0	1,198	106	1,092	1,820	0.022	0.18	0.59	0.095	809.0		172.19			
9:30	30 min.	11.0	11.0	11.0	11.0	11.0	40.9	14.2	170.8	104.9	199.0	1,312	119	1,193	1,988	0.025	0.19	0.64	0.103	810.0		170.81			
10:00	30 min.	11.0	11.0	11.0	11.0	11.0	41.0	14.6	176.0	110.0	161.0	1,578	135	1,443	2,405	0.029	0.24	0.79	0.128	815.0		175.96			
10:30	30 min.	11.0	11.0	11.0	11.0	11.0	38.8	14.2	171.3	107.5	195.0	1,624	139	1,485	2,475	0.029	0.24	0.79	0.129	838.0		171.33			
11:00	30 min.	11.0	11.0	11.0	11.0	11.0	38.8	14.2	171.3	107.5	195.0	1,687	149	1,538	2,563	0.031	0.25	0.82	0.133	851.0		171.33			
11:30	30 min.	11.0	11.0	11.0	11.0	11.0	38.8	14.2	171.3	107.6	195.0	1,641	142	1,499	2,498	0.030	0.24	0.80	0.130	884.0		171.33			
12:00	30 min.	11.0	11.0	11.0	11.0	11.0	36.4	14.4	173.1	111.7	195.0	1,611	138	1,473	2,455	0.029	0.24	0.80	0.129	899.0		173.07			
12:30	30 min.	11.0	11.0	11.0	11.0	11.0	36.4	14.4	173.1	111.7	195.0	1,519	127	1,392	2,320	0.027	0.23	0.75	0.122	914.0		173.07			
13:00	30 min.	11.0	11.0	11.0	11.0	11.0	36.4	14.4	173.1	111.6	195.0	1,389	117	1,272	2,120	0.025	0.21	0.69	0.111	934.0		173.07			
13:30	30 min.	11.0	11.0	11.0	11.0	11.0	36.6	14.5	174.8	113.2	195.0	1,113	91	1,022	1,703	0.019	0.17	0.56	0.090	940.0		174.79			
14:00	30 min.	11.0	11.0	11.0	11.0	11.0	36.5	14.7	176.5	115.0	195.0	974	79	895	1,492	0.017	0.15	0.49	0.080	923.0		176.50			
14:30	30 min.	11.0	11.0	11.0	11.0	11.0	36.5	14.7	176.5	115.0	195.0	744	58	686	1,143	0.013	0.11	0.38	0.061	911.0		176.50			
15:00	30 min.	11.0	11.0	11.0	11.0	11.0	36.5	14.8	178.2	116.7	195.0	588	34	554	923	0.007	0.09	0.31	0.050	903.0		178.18			
Average Reading:		**11.0**	**11.0**	**11.0**	**11.0**	**11.0**	**39.3**	**14.6**	**175.4**	**111.1**	**171.5**	**1213.8**	**101.5**	**Total Removed:**		**0.357**	**2.97**	**9.92**	**1.608**	**Total Lbs Discharged:**			0.00065	0.00216	99.56%

Comments
Poly Inc. was on site for the event.

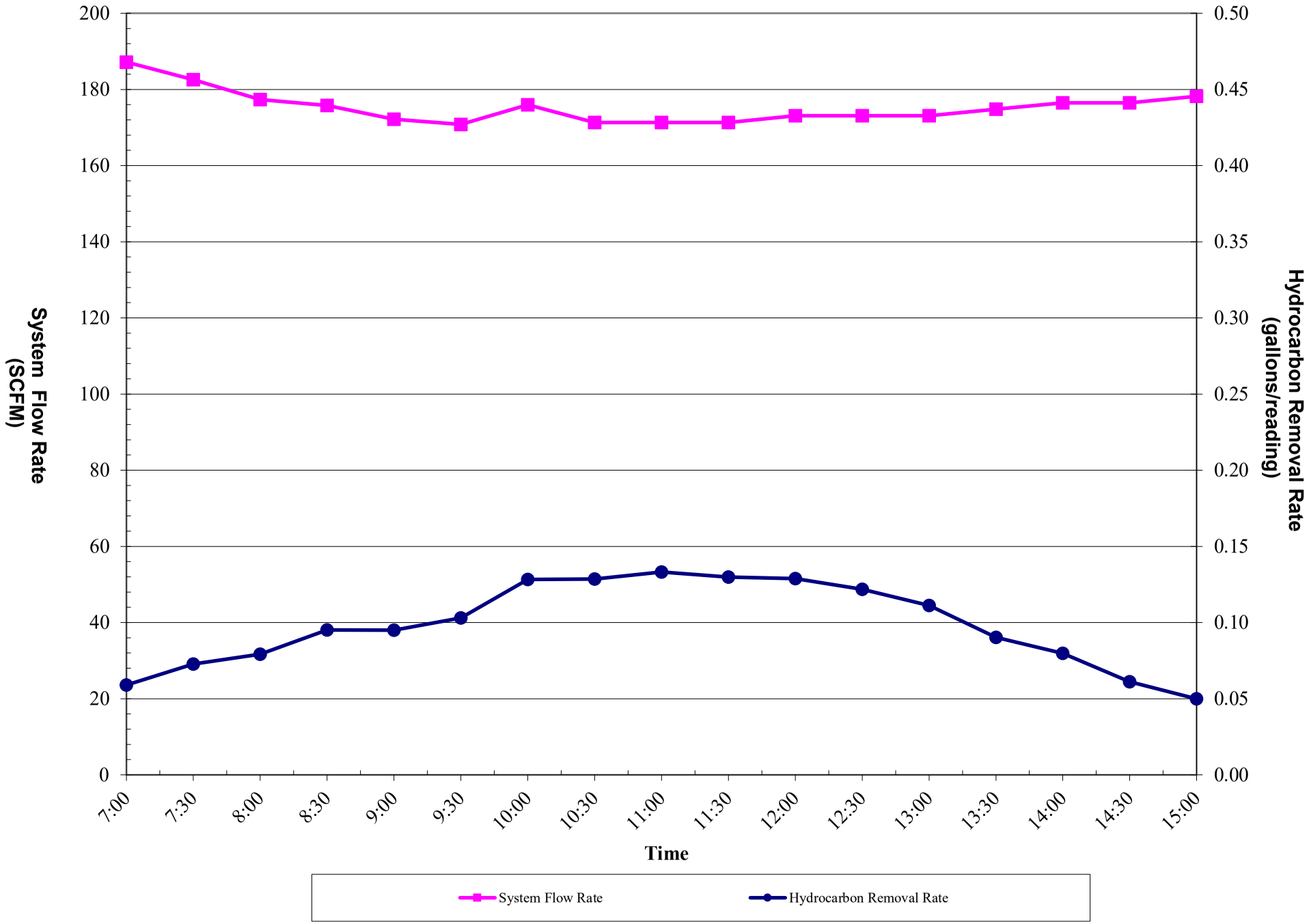
Field Data

RJ's Service Station
16051 US Highway 431 South, Glencoe, AL
Operator Name: Michael Gammage
Date: July 9, 2025
Project # AL072505

Response Ratio : 600
(Gas=600, Diesel=203, JetA=198)
Specific Gravity : 0.74
(Gas=0.74, Diesel=0.83, JetA=0.80)

			Dilution Stream		Pump Discharge Stream				Extraction Well #		MW-3	Extraction Well #		MW-4D	Extraction Well #		MW-14D	Extraction Well #		RW-1	Extraction Well #		RW-2	
LINE #	Time CST	Time Interval	Bleed Air Diff Press. ("WC)	Bleed Air Temp	Effluent Pressure (psi)	Manifold Vacuum ("Hg")	Effluent Separator Temp	Effluent Diff Press ("WC)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	LINE#
1	7:00	0.01	0.11	72	0.2	14	100	0.5	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	1
2	7:30	30	0.1	72	0.2	14	105	0.48	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	2
3	8:00	30	0.09	73	0.2	14	114	0.46	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	3
4	8:30	30	0.09	74	0.2	14	124	0.46	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	4
5	9:00	30	0.09	81	0.2	14	162	0.47	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	5
6	9:30	30	0.09	90	0.2	14	199	0.49	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	6
7	10:00	30	0.09	89	0.2	14	161	0.49	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	7
8	10:30	30	0.08	88	0.2	14	195	0.49	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	8
9	11:00	30	0.08	88	0.2	14	195	0.49	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	9
10	11:30	30	0.08	89	0.2	14	195	0.49	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	10
11	12:00	30	0.07	90	0.2	14	195	0.5	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	11
12	12:30	30	0.07	89	0.2	14	195	0.5	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	12
13	13:00	30	0.07	88	0.2	14	195	0.5	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	13
14	13:30	30	0.07	84	0.2	14	195	0.51	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	14
15	14:00	30	0.07	85	0.2	14	195	0.52	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	15
16	14:30	30	0.07	87	0.2	14	195	0.52	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	16
17	15:00	30	0.07	87	0.2	14	195	0.53	11	5	18	11	5	21	11	5	25	11	5	24	11	5	23	17
Average Reading:			0.08	83.88	0.20	14.00	171.47	0.49	11.00	5.00	18.00	11.00	5.00	21.00	11.00	5.00	25.00	11.00	5.00	24.00	11.00	5.00	23.00	

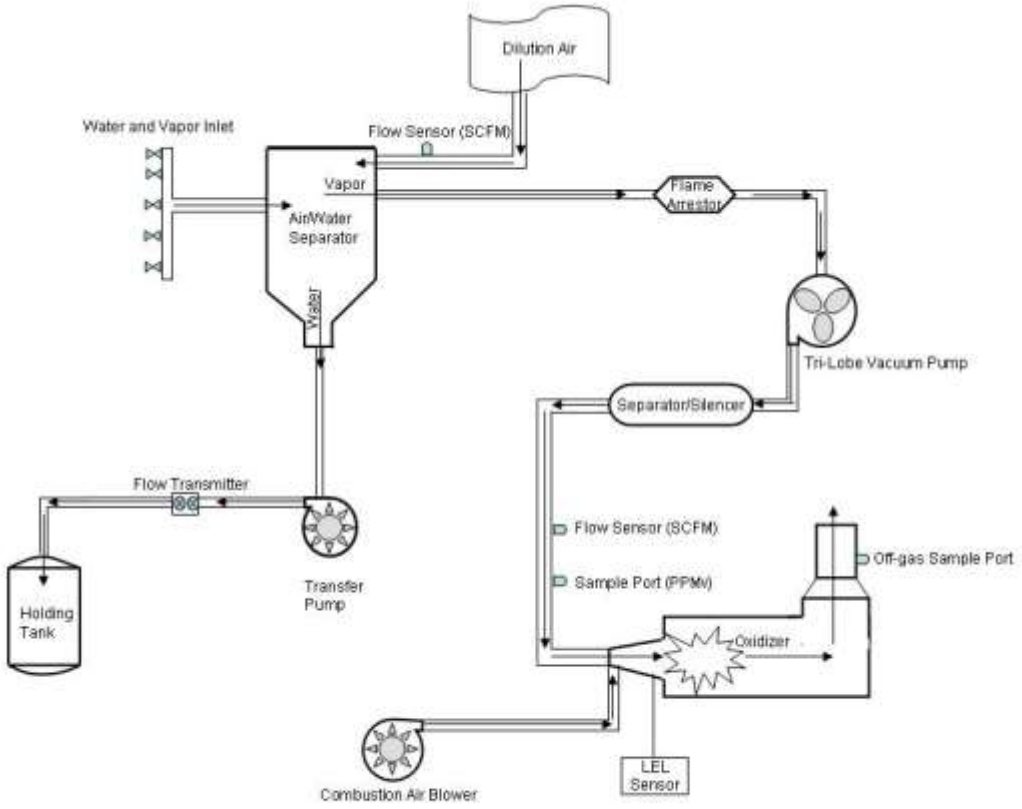
System Flow and Hydrocarbon Removal Rate



Multi-Phase Extraction Technology

Multi-phase extraction (MPE) systems remove vapors and liquids simultaneously from the subsurface. Ambient air (5 to 20 cubic feet per minute) is drawn down the casing of monitoring wells, across the groundwater interface, and back up a drop tube, providing the necessary lift to extract subsurface groundwater. An airflow gauge attached to a well head is used to measure the amount of ambient air, which is subtracted from the total flow. Additionally, vacuum gauges are used to measure the extraction vacuum, as well as the vacuum applied to the subsurface stratigraphy.

The extracted vapors and liquids are transferred to a mobile treatment system, where the liquids are separated and discharged into a storage tank for proper disposal. Soil vapors are transferred to a forced air thermal oxidation (ThOx) unit and incinerated at approximately 1,500 degrees Fahrenheit. The treated air is then discharged into the atmosphere. Following is a process flow diagram for the Brown Remediation, Inc. MPE system.



Summary of Calculations

During the MPE event, a total flow rate measurement of the process stream is taken on the discharge side of the vacuum extraction pump and before off-gas treatment. This measurement is performed using an averaging pitot tube (Dwyer DS-300) attached to a digital differential pressure sensor. This measurement is used to calculate the removal rates and the off-gas emission rates and is reported in actual cubic feet per minute. A separate flow rate is calculated for the extraction well field, as well as for any additional ambient air introduced into the influent stream. To determine the volume of hydrocarbon removed during the event, samples of the extracted vapors are collected from a sample port located before the vapor stream enters the ThOx unit. A second sample port located on the exhaust stack of the ThOx unit provides access for determining the destruction efficiency of the combustion process.

Concentration measurements are taken using a TVA-1000A flame ionization detector (FID) calibrated to methane. This FID instrument has a dynamic range of 0 to 50,000 parts per million (PPM) as methane, and 0 to 100,000 PPM as hydrocarbon. The concentration measurements of the process stream are made after the addition of ambient air at the phase separator and prior to the addition of combustion air at the oxidizer; however, the concentration of the process stream at the sample port exceed the dynamic range of the FID instrument. To accurately record the high concentrations commonly observed during an MPE event, a calibrated 10:1 dilution assembly is used to accurately dilute the sample. This dilution assembly, along with the FID instrument, is calibrated before the start of each event.

To account for naturally occurring methane present during a typical MPE event, two concentration measurements are taken. One unfiltered sample measures the total volatile organic compounds (VOCs) in the subsurface. The other sample is collected using an in-line activated carbon filter, which adsorbs the hydrocarbon compounds, leaving only methane. This methane-only result is then subtracted from the total VOC measurement for use in the mass hydrocarbon removal calculation. However, as with any FID instrument, the non-methane organic compound results are recorded as parts per million by volume (PPMv) as if the concentrations were equivalent to methane gas. A conversion from methane to hydrocarbon, and from volume to weight, is necessary to calculate the accurate hydrocarbon removal. By using the TVA-1000's factory-certified response ratio for various hydrocarbons, the measurements are converted to equivalent hydrocarbon in milligrams per liter (mg/L). For example, a TVA-1000 FID has an average response ratio of 600 PPMv per mg/L for unleaded gasoline and 200 PPMv per mg/L for diesel. Following is a summary of calculations.

Flow

$$Q = 128.8 \times K \times D \times SQRT((P \times dP) / (T + 460) \times Ss)$$

Where:

Q =	Flow expressed in Standard Cubic Feet per Minute (SCFM)
K =	Flow coefficient (provided by Dwyer Instruments, Inc.)
D =	Inside diameter of process line in inches
SQRT =	Square Root
P =	Static line pressure
dP =	Differential pressure expressed in inches of water column (WC)
T =	Temperature in degrees Fahrenheit (plus 460 equals degrees Rankine)
Ss =	Specific gravity at 60 degrees Fahrenheit

Conversion of Field Data (PPMv to mg/m^3)

C = (PPMv / R) x (1000 L / 1 m^3)

Where:

R = TVA response ratio supplied in The Foxboro Monitor, Volume 3, Issue 1A (600 PPMv / (mg/L) for gasoline and 200 PPMv / (mg/L) for diesel)

Hydrocarbon Loading Rate

M = Q x C x c

Where:

M = Contaminant loading rate (lbs/hr)

Q = Air flow rate (SCFM)

C = Contaminant concentration (mg/m^3)

c = (1m^3 / 35.31 ft) x (1 lb / 454 x 10^3) x (60 min / 1 hr) = 3.743 x 10^{-6}

Conversion of Pounds of Hydrocarbon to Equivalent Gallons

Equivalent Gallons = Ss x c

Where:

Ss = Specific gravity (0.74 = gasoline, 0.84 = diesel fuel)

c = 8.34 lbs/gallon

SUNOCO, LLC
DALLAS TX

If any questions please reach out to :
CustomerSolutions.Mailbox@Sunoco.com

Invoice Number	6804974045
Invoice Date	07/16/2025
Payment Terms	Net 30 Days
Due Date	08/15/2025

Ship Date	07/16/2025	**Account Number**	1000045969
Ship From	S-MDSTREAM	**Tax Authority**	GA
Ship Via	SUNOCO, LLC	**Sales Person**	
Delivery Date	07/16/2025	**Please Remit To**	Sunoco,LLC P.O.Box 206458 Dallas,TX 75320-6458

Credit Memo/Invoice

Line No.	Item Description	Detailed Description	Billing Quantity	Unit Price	Amount
1	JUL-2025 PCW Treatment	R26558B Project: AL072505 Manifest: 10949 Service Date 07/14/2025	800	0.3200	256.00 USD
State Tax					0.00 USD
Invoice Total					256.00 USD

Late Payment Notification

A Late Payment charge will be made if Invoice is unpaid after Due Date

Sold To	Bill To	Business Location
1000045969	**1000045969**	**8000894601**
BROWN REMEDIATION INC	BROWN REMEDIATION INC	BROWN REMEDIATION INC
227 SANDY SPRINGS PL STE D	227 SANDY SPRINGS PL STE D	227 SANDY SPRINGS PL STED122
Atlanta GA 30328-3849	Atlanta GA 30328-3849	ATLANTA Ga 30328-0000

Sunoco LLC

2700 Ishkooda-Wenonah Road
Birmingham, AL 35211-5705

Plant Use Only
R # 765588 Date: 7-14-25
Received by R:
T # Date:
Received by T:

AGREEMENT - RECEIPT OF PRODUCT BY SUNOCO LLC

SOURCE OF PRODUCT

Facility Name: RJ's Service Station
Site Address: 18051 US Highway 431 South
City Glencoe State: AL Zip
Phone: ( )
Fax: ( )
Contact:

BILLING INFORMATION

Customer Name: Brown Remediation
Billing Address: 227 Sandy Springs Pl. Ste. D
City Atlanta State: GA Zip 30328
Phone: (404) 256-0667
Fax: (404) 256-0668
Contact: Tom Brown

PRODUCT INFORMATION

Please complete all information:

Tank Number 7
Gallons 800

Type of Product: *(Circle one)* (PCW) Sludge Petroleum TMIX
(If Sludge, further identify as): Gas Diesel Other

- The term petroleum contaminated waters ("PCW") means waters containing unused petroleum products and includes tank draw waters, tank cleaning waters/sludge, etc,
- Product containing materials such as fuel additives, pipeline lube or with greater than 5% ethanol are not considered PCW and special approval is required prior to shipment and acceptance.

AGREEMENT

(Additional terms and conditions on reverse side)

This document evidences the delivery by the company identified below ("Customer") and receipt by Sunoco LLC of PCW, sludge, petroleum transmix, or other product of the type and amount described above in the Product Information box. Customer acknowledges and agrees to the additional terms and conditions on the back of this form, and acknowledges receipt of a copy of the same.

NAME OF COMPANY: Brown Remediation
(Print Name of Company)
BY: Michael Gammage
(Signature)
NAME: Michael Gammage
(Print Name of Person Signing)
TITLE: Operator
(Print Title of Person Signing)
DATE: 7-14 20 25

1 2347958.8

227 Sandy Springs Place
Suite D-122
Atlanta, Georgia 30328-5918
Phone 404 256 0667
Fax 404 256 0668

Non-Hazardous Waste Manifest

Manifest No.: 10949 Project No.: AL072505 Quantity in U.S. Gallons: 800

Section 1: Generator

Company Name: RJ's Service Station
Address: 10051 US Highway 431 South
City: Glencoe State: AL ZIP:
Phone No.: Fax No.:

Location:
Address:
City: State: ZIP:
Phone No.: Fax No.:

Description of Waste: PCW

This is to certify that the above-named material is properly described and is in proper condition for transportation according to the applicable regulations of the Department of Transportation. I further certify that the above-named material is not a hazardous waste as defined by 40 CFR, Parts 261 and 279, or any applicable federal, state, or local laws.

Authorized Agent Signature Date

Section 2: Transporter

Primary

Company Name: Brown Remediation, Inc
Address: 227 Sandy Springs Place
Suite D-122
City: Atlanta State: GA ZIP: 30328
Phone No.: (404) 256-0667 Fax No.: (404) 256-0668
Driver Name: Michael Gammage
Truck No.: 7 Vehicle Tag: P400713

Driver Signature 7-14-2025 Date

Secondary

Company Name:
Address:
City: State: ZIP:
Phone No.: Fax No.:
Driver Name:
Truck No.: Vehicle Tag:

Driver Signature Date

Section 3: Destination

Company Name: Sunoco
Address:
City: Birmingham State: AL ZIP:
Phone No.: Fax No.:

I hereby certify that the above material has been accepted, and to the best of my knowledge, the foregoing is true and accurate.

Authorized Agent Signature 7.14.25 Date

RT# 7155813

White – Destination Yellow – Brown Remediation

227 Sandy Springs Place
Suite D-122
Atlanta, Georgia 30328-5918
Phone 404 256 0667
Fax 404 256 0668

August 14, 2025

Brent Heard
Poly, Inc.
117 Gemini Circle, Suite 416
Birmingham, AL 35209

Subject: 8-Hour Multi-Phase Extraction Event
RJ's Service Station
16051 US Highway 431 South
Glencoe, AL
Project No. AL082506

Dear Mr. Heard:

Brown Remediation, Inc. is pleased to provide you with this report of our Multi-Phase Extraction (MPE) service conducted at the subject facility on August 4, 2025.

Site monitoring wells MW-3, MWR-4D, MW-14D, RW-1, and RW-2 were gauged before the MPE event with an oil-water interface probe to determine the static depth to groundwater and the presence of light non-aqueous phase liquid (LNAPL). Detectable levels of LNAPL were not observed in monitoring wells measured during the initial gauging event.

MW-3, MWR-4D, MW-14D, RW-1, and RW-2 were used as extraction wells during the MPE event. A drop tube was connected to the vacuum port of the MPE unit before lowering it below the static groundwater level in each extraction well. Vacuum was applied to the drop tube, thereby creating a vacuum influence, which can be measured in adjacent monitoring wells.

Following the MPE event, all wells were again gauged to determine the new static depth to groundwater and the presence of LNAPL. The differences in water levels before and after the event were recorded. No LNAPL was detected in any of the wells measured.

Following is a summary of the site data recorded during the event.

MPE Event Gauging Data Summary

Well	Before Event			Influence Vacuum	After Event			Change in
Number	DTP (ft)	DTW (ft)	Prod.(ft)	Time: CST 16:00	DTP (ft)	DTW (ft)	Prod.(ft)	Elevation (ft)
MW-3		24.40		-6.4" Hg		27.31		-2.91
MWR-4D		29.65		-6.5" Hg		33.05		-3.40
MW-14D		36.63		-7.0" Hg		38.61		-1.98
RW-1		34.62		-7.0" Hg		36.29		-1.67
RW-2		34.10		-6.9" Hg		36.11		-2.01

Calculated values for carbon, methane, and hydrocarbon recorded during the MPE event are presented below. In addition, the amount of recovered groundwater, propane consumption, and total MPE event time are noted.

Event Totals	
Total Carbon (lbs)	2.58
Total Methane (lbs)	0.29
Total Hydrocarbon (lbs)	8.62
Equiv. Hydrocarbons (gallons)	1.40
Total Liquid (gallons)	350
Total Propane (gallons)	35.0
Total Event Time (hours)	8.0

Cumulative Totals	
Total Carbon (lbs)	47.54
Total Methane (lbs)	6.27
Total Hydrocarbon (lbs)	158.60
Equiv. Hydrocarbons (gallons)	25.70
Total Liquid (gallons)	7068
Total Propane (gallons)	470.0
Events	14

Extracted groundwater was transported to Sunoco located in Birmingham, Alabama, by Brown Remediation, Inc. A copy of the manifest is attached.

We appreciate the opportunity to provide you with these services. Please do not hesitate to call if you have any questions.

Sincerely,

Brown Remediation, Inc.

Thomas Brown

Thomas Brown
Director of Operations

Attachments: Site Map
MPE Event Data Summary
Field Data Sheet
Flow and Hydrocarbon Removal Rates
MPE Technology Description and Calculations
Disposal Manifest

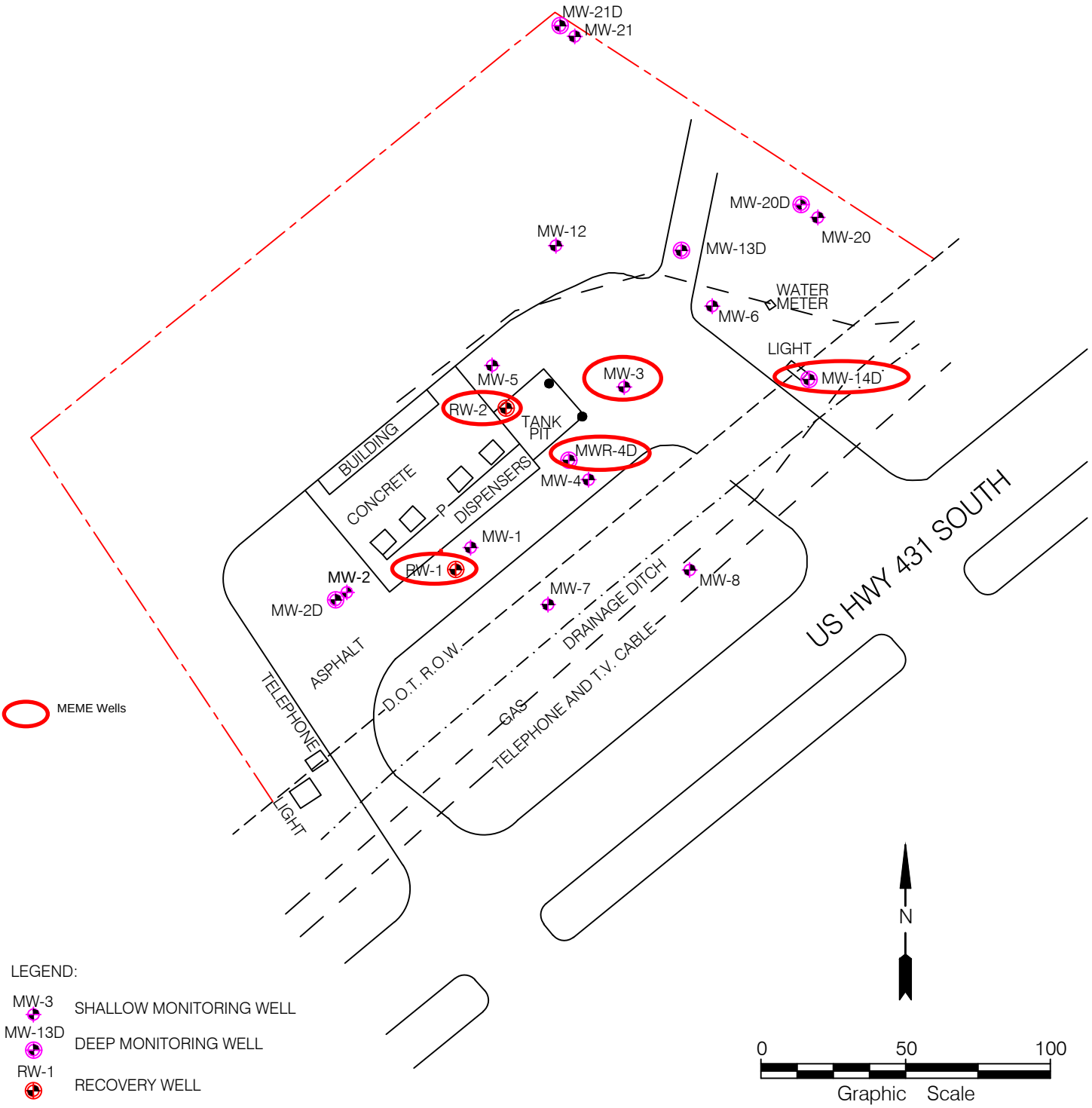


FIGURE No. 1	SITE MAP PROJECT NO. 8523047, CP-63 (11-13-2023) RJ'S SERVICE STATION HIGHWAY 431 SOUTH GLENCOE, ALABAMA	POLY, INC. 1935 Headland Avenue Dothan, AL 36303 334-793-4700 102 Sunset Lane, Shalimar, FL 32579, 850-609-1100 117 Gemini Circle, Ste. 416, Birmingham, AL 35209, 205-913-0330 WWW.POLY-INC.COM	DESIGNED BY: DRAWN BY: JDP DATE: NOVEMBER 2023 ENG / ARCH OF RECORD: REGISTRATION No. Cert. of Auth. No. (AL. / FL. / GA.) ARCHITECT CA-0480 / AA-C001551 / 001118 ENGINEER CA-78-E / CA-1818 / 001118

MPE Event Data Summary

RJ's Service Station
16051 US Highway 431 South, Glencoe, AL
Operator Name: Michael Gammage
Date: August 4, 2025
Project # AL082506

Tiime CST	Time Interval (minutes)	Applied Well Head Vacuum					Addl. Ambient Air	Total Velocity	Total Effluent Flow	Well Field Flow	Pump Effluent Temp.	Total Influent FID	Filtered (CH_4) FID	Hydrocarbon Compounds		Before off-gas treatment				Stack Gas Temp.	Effluent Conc. Data	Total Flow Rate	After off-gas treatment		
		MW-3	MWR-4D	MW-14D	RW-1	RW-2										Total Methane Removed	Total Carbon Removed	Total Hydrocarbon Removed					Carbon Emission Rate	Equiv. Hydrocarbon Rate	Destruction Efficiency Rating %
		(in/Hg)	(in/Hg)	(in/Hg)	(in/Hg)	(in/Hg)	(SCFM)	ft/sec.	(SCFM)	(SCFM)	(F^0)	(PPMv)	(PPMv)	(PPMv)	(mg/m3)	(lbs./ reading)	(lbs./ reading)	(lbs./ reading)	(gal./ reading)	(F^0)	(PPMv)	(SCFM)	(lbs./ reading)	(lbs./ reading)	
8:30	0 min.	11.0	11.0	11.0	11.0	11.0	44.0	15.5	186.6	117.5	115.0	1,478	124	1,354	2,257	0.000	0.00	0.00	0.000	882.0		186.55			
9:00	30 min.	11.0	11.0	11.0	11.0	11.0	41.9	14.6	175.9	109.0	174.0	1,397	117	1,280	2,133	0.025	0.21	0.70	0.114	880.0		175.91			
9:30	30 min.	11.0	11.0	11.0	11.0	11.0	41.8	14.4	173.1	106.2	195.0	1,334	111	1,223	2,038	0.024	0.20	0.66	0.107	885.0	4.50	173.07	0.0007	0.0024	99.63%
10:00	30 min.	11.0	11.0	11.0	11.0	11.0	39.4	14.4	173.1	108.7	195.0	1,302	108	1,194	1,990	0.023	0.19	0.64	0.104	894.0		173.07			
10:30	30 min.	11.0	11.0	11.0	11.0	11.0	36.9	14.4	172.9	111.0	196.0	1,277	105	1,172	1,953	0.022	0.19	0.63	0.102	905.0		172.94			
11:00	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.5	174.7	115.3	196.0	1,213	99	1,114	1,857	0.021	0.18	0.61	0.098	906.0		174.66			
11:30	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.5	174.3	114.9	199.0	1,188	97	1,091	1,818	0.021	0.18	0.59	0.096	910.0		174.26			
12:00	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.5	174.3	114.9	199.0	1,131	90	1,041	1,735	0.019	0.17	0.57	0.092	915.0		174.26			
12:30	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.5	174.3	115.0	199.0	1,091	87	1,004	1,673	0.019	0.16	0.55	0.088	912.0		174.26			
13:00	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.5	174.3	115.0	199.0	1,046	81	965	1,608	0.017	0.16	0.52	0.085	911.0		174.26			
13:30	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.6	176.0	116.7	199.0	1,008	77	931	1,552	0.017	0.15	0.51	0.083	902.0		175.96			
14:00	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.6	176.0	116.7	199.0	964	75	889	1,482	0.016	0.15	0.49	0.079	889.0		175.96			
14:30	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.8	177.6	118.4	199.0	915	69	846	1,410	0.015	0.14	0.47	0.076	886.0		177.64			
15:00	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.8	177.6	118.4	199.0	879	64	815	1,358	0.014	0.14	0.45	0.073	882.0		177.64			
15:30	30 min.	11.0	11.0	11.0	11.0	11.0	34.2	14.8	177.8	118.5	198.0	831	61	770	1,283	0.013	0.13	0.43	0.069	859.0		177.78			
16:00	30 min.	11.0	11.0	11.0	11.0	11.0	34.2	14.8	177.8	118.5	198.0	798	57	741	1,235	0.012	0.12	0.41	0.067	848.0		177.78			
16:30	30 min.	11.0	11.0	11.0	11.0	11.0	34.3	14.8	177.8	118.5	198.0	752	52	700	1,167	0.011	0.12	0.39	0.063	844.0		177.78			
Average Reading:		**11.0**	**11.0**	**11.0**	**11.0**	**11.0**	**36.2**	**14.6**	**176.1**	**114.9**	**191.6**	**1094.4**	**86.7**	**Total Removed:**		**0.290**	**2.58**	**8.62**	**1.397**	**Total Lbs Discharged:**			0.00073	0.00243	99.63%

Comments
Poly Inc. was on site for the event.

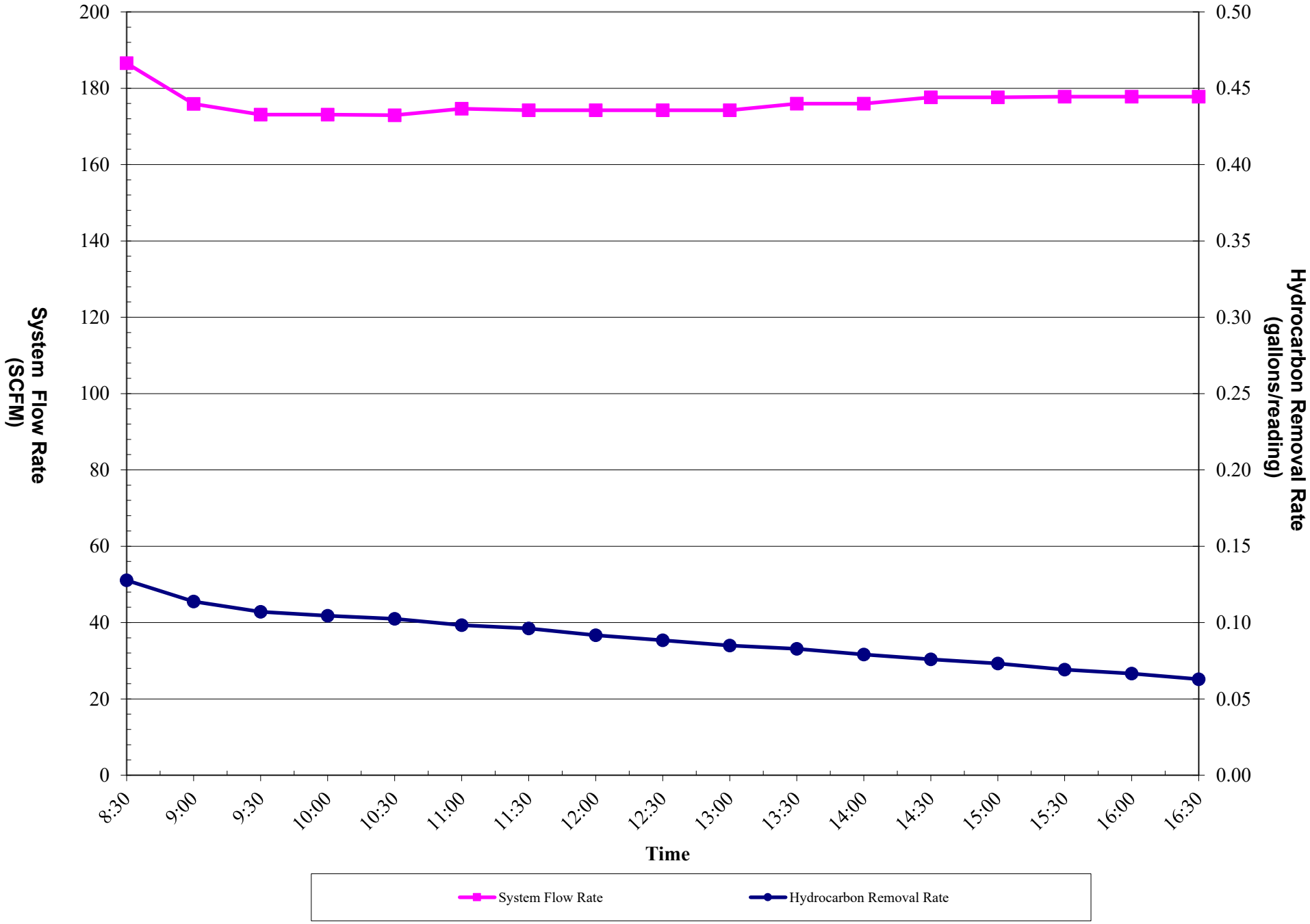
Field Data

RJ's Service Station
16051 US Highway 431 South, Glencoe, AL
Operator Name: Michael Gammage
Date: August 4, 2025
Project # AL082506

Response Ratio : 600
(Gas=600, Diesel=203, JetA=198)
Specific Gravity : 0.74
(Gas=0.74, Diesel=0.83, JetA=0.80)

LINE #	Time CST	Time Interval	Dilution Stream		Pump Discharge Stream				Extraction Well #		MW-3	Extraction Well #		MWR-4D	Extraction Well #		MW-14D	Extraction Well #		RW-1	Extraction Well #		RW-2	LINE#
			Bleed Air Diff Press. ("WC)	Bleed Air Temp	Effluent Pressure (psi)	Manifold Vacuum ("Hg")	Effluent Separator Temp	Effluent Diff Press ("WC)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	Wellhead Vacuum ("Hg)	Ambient Air (SCFM)	Stinger Depth (ft.)	
1	8:30	0.01	0.1	65	0.2	14	115	0.51	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	1
2	9:00	30	0.09	64	0.2	14	174	0.5	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	2
3	9:30	30	0.09	67	0.2	14	195	0.5	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	3
4	10:00	30	0.08	72	0.2	14	195	0.5	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	4
5	10:30	30	0.07	74	0.2	14	196	0.5	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	5
6	11:00	30	0.06	74	0.2	14	196	0.51	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	6
7	11:30	30	0.06	75	0.2	14	199	0.51	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	7
8	12:00	30	0.06	75	0.2	14	199	0.51	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	8
9	12:30	30	0.06	76	0.2	14	199	0.51	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	9
10	13:00	30	0.06	76	0.2	14	199	0.51	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	10
11	13:30	30	0.06	76	0.2	14	199	0.52	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	11
12	14:00	30	0.06	76	0.2	14	199	0.52	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	12
13	14:30	30	0.06	76	0.2	14	199	0.53	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	13
14	15:00	30	0.06	76	0.2	14	199	0.53	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	14
15	15:30	30	0.06	77	0.2	14	198	0.53	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	15
16	16:00	30	0.06	77	0.2	14	198	0.53	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	16
17	16:30	30	0.06	76	0.2	14	198	0.53	11	5	26	11	5	32	11	5	38	11	5	37	11	5	37	17
Average Reading:			0.07	73.65	0.20	14.00	191.59	0.51	11.00	5.00	26.00	11.00	5.00	32.00	11.00	5.00	38.00	11.00	5.00	37.00	11.00	5.00	37.00	

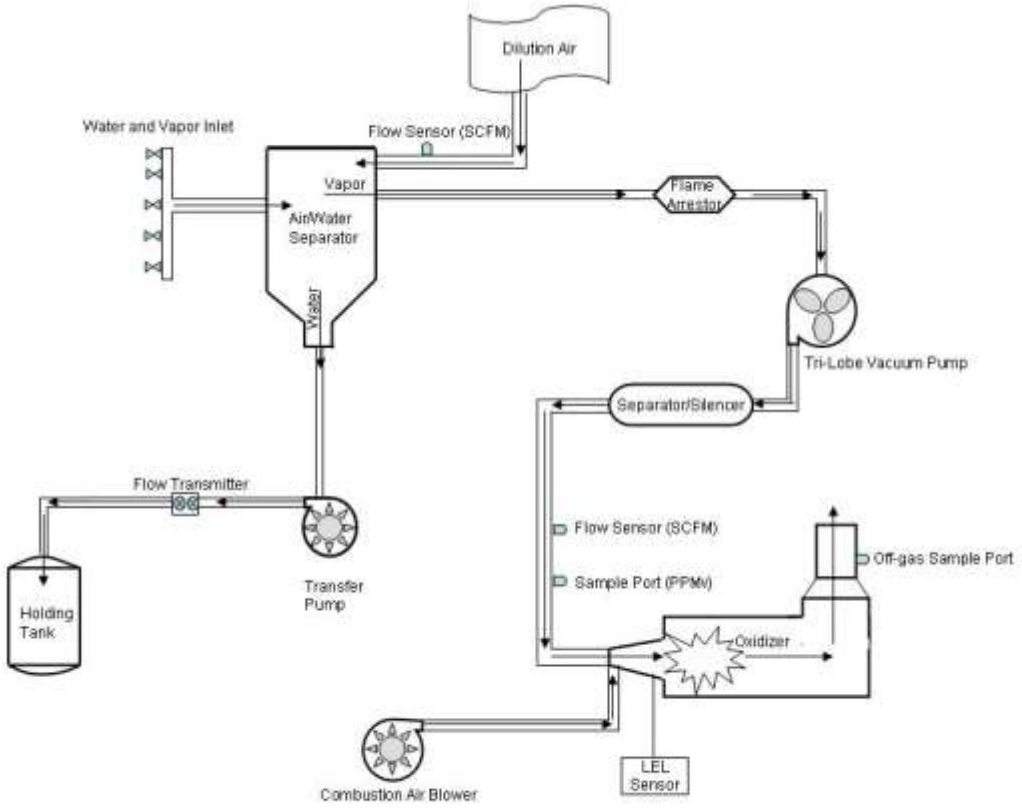
System Flow and Hydrocarbon Removal Rate



Multi-Phase Extraction Technology

Multi-phase extraction (MPE) systems remove vapors and liquids simultaneously from the subsurface. Ambient air (5 to 20 cubic feet per minute) is drawn down the casing of monitoring wells, across the groundwater interface, and back up a drop tube, providing the necessary lift to extract subsurface groundwater. An airflow gauge attached to a well head is used to measure the amount of ambient air, which is subtracted from the total flow. Additionally, vacuum gauges are used to measure the extraction vacuum, as well as the vacuum applied to the subsurface stratigraphy.

The extracted vapors and liquids are transferred to a mobile treatment system, where the liquids are separated and discharged into a storage tank for proper disposal. Soil vapors are transferred to a forced air thermal oxidation (ThOx) unit and incinerated at approximately 1,500 degrees Fahrenheit. The treated air is then discharged into the atmosphere. Following is a process flow diagram for the Brown Remediation, Inc. MPE system.



Summary of Calculations

During the MPE event, a total flow rate measurement of the process stream is taken on the discharge side of the vacuum extraction pump and before off-gas treatment. This measurement is performed using an averaging pitot tube (Dwyer DS-300) attached to a digital differential pressure sensor. This measurement is used to calculate the removal rates and the off-gas emission rates and is reported in actual cubic feet per minute. A separate flow rate is calculated for the extraction well field, as well as for any additional ambient air introduced into the influent stream. To determine the volume of hydrocarbon removed during the event, samples of the extracted vapors are collected from a sample port located before the vapor stream enters the ThOx unit. A second sample port located on the exhaust stack of the ThOx unit provides access for determining the destruction efficiency of the combustion process.

Concentration measurements are taken using a TVA-1000A flame ionization detector (FID) calibrated to methane. This FID instrument has a dynamic range of 0 to 50,000 parts per million (PPM) as methane, and 0 to 100,000 PPM as hydrocarbon. The concentration measurements of the process stream are made after the addition of ambient air at the phase separator and prior to the addition of combustion air at the oxidizer; however, the concentration of the process stream at the sample port exceed the dynamic range of the FID instrument. To accurately record the high concentrations commonly observed during an MPE event, a calibrated 10:1 dilution assembly is used to accurately dilute the sample. This dilution assembly, along with the FID instrument, is calibrated before the start of each event.

To account for naturally occurring methane present during a typical MPE event, two concentration measurements are taken. One unfiltered sample measures the total volatile organic compounds (VOCs) in the subsurface. The other sample is collected using an in-line activated carbon filter, which adsorbs the hydrocarbon compounds, leaving only methane. This methane-only result is then subtracted from the total VOC measurement for use in the mass hydrocarbon removal calculation. However, as with any FID instrument, the non-methane organic compound results are recorded as parts per million by volume (PPMv) as if the concentrations were equivalent to methane gas. A conversion from methane to hydrocarbon, and from volume to weight, is necessary to calculate the accurate hydrocarbon removal. By using the TVA-1000's factory-certified response ratio for various hydrocarbons, the measurements are converted to equivalent hydrocarbon in milligrams per liter (mg/L). For example, a TVA-1000 FID has an average response ratio of 600 PPMv per mg/L for unleaded gasoline and 200 PPMv per mg/L for diesel. Following is a summary of calculations.

Flow

$$Q = 128.8 \times K \times D \times SQRT((P \times dP) / (T + 460) \times Ss)$$

Where:

Q =	Flow expressed in Standard Cubic Feet per Minute (SCFM)
K =	Flow coefficient (provided by Dwyer Instruments, Inc.)
D =	Inside diameter of process line in inches
SQRT =	Square Root
P =	Static line pressure
dP =	Differential pressure expressed in inches of water column (WC)
T =	Temperature in degrees Fahrenheit (plus 460 equals degrees Rankine)
Ss =	Specific gravity at 60 degrees Fahrenheit

Conversion of Field Data (PPMv to mg/m^3)

C = (PPMv / R) x (1000 L / 1 m^3)

Where:

R = TVA response ratio supplied in The Foxboro Monitor, Volume 3, Issue 1A (600 PPMv / (mg/L) for gasoline and 200 PPMv / (mg/L) for diesel)

Hydrocarbon Loading Rate

M = Q x C x c

Where:

M = Contaminant loading rate (lbs/hr)

Q = Air flow rate (SCFM)

C = Contaminant concentration (mg/m^3)

c = (1m^3 / 35.31 ft) x (1 lb / 454 x 10^3) x (60 min / 1 hr) = 3.743 x 10^{-6}

Conversion of Pounds of Hydrocarbon to Equivalent Gallons

Equivalent Gallons = Ss x c

Where:

Ss = Specific gravity (0.74 = gasoline, 0.84 = diesel fuel)

c = 8.34 lbs/gallon

SUNOCO, LLC
DALLAS TX

If any questions please reach out to :
CustomerSolutions.Mailbox@Sunoco.com

Invoice Number	6805058387
Invoice Date	08/11/2025
Payment Terms	Net 30 Days
Due Date	09/10/2025

Ship Date	08/11/2025	**Account Number**	1000045969
Ship From	S-MDSTREAM	**Tax Authority**	GA
Ship Via	SUNOCO, LLC	**Sales Person**	
Delivery Date	08/11/2025	**Please Remit To**	Sunoco,LLC P.O.Box 206458 Dallas,TX 75320-6458

Credit Memo/Invoice

Line No.	Item Description	Detailed Description	Billing Quantity	Unit Price	Amount
1	AUG-2025 PCW Treatment	R26628B Project: AL082506 Manifest: 10956 Service Date 08/06/2025	350	0.3200	112.00 USD
State Tax					0.00 USD
Invoice Total					112.00 USD

Late Payment Notification

A Late Payment charge will be made if Invoice is unpaid after Due Date

Sold To	Bill To	Business Location
1000045969	**1000045969**	**8000894601**
BROWN REMEDIATION INC	BROWN REMEDIATION INC	BROWN REMEDIATION INC
227 SANDY SPRINGS PL STE D	227 SANDY SPRINGS PL STE D	227 SANDY SPRINGS PL STED122
Atlanta GA 30328-3849	Atlanta GA 30328-3849	ATLANTA Ga 30328-0000

Sunoco LLC
2700 Ishkooda-Wenonah Road
Birmingham, AL 35211-5705

Plant Use Only
R # 266288 Date: 8/6/25
Received by R: Buddy
T # _____ Date: _____
Received by T: _____

AGREEMENT - RECEIPT OF PRODUCT BY SUNOCO LLC

SOURCE OF PRODUCT

Facility Name: RJ's Service Station
Site Address: 16051 US Highway 431 South
City: Glencoe State: AL Zip: _____
Phone: ( ) _____
Fax: ( ) _____
Contact: _____

BILLING INFORMATION

Customer Name: Brown Remediation
Billing Address: 227 Sandy Springs Pl. Ste. D
City: Atlanta State: GA Zip: 30328
Phone: (404) 256-0627
Fax: (404) 256-0668
Contact: Tom Brown

PRODUCT INFORMATION

Please complete all information:

Tank Number 7
Gallons 350

Type of Product: *(Circle one)* (PCW) Sludge Petroleum TMIX
(If Sludge, further identify as): Gas Diesel Other_____

- The term petroleum contaminated waters ("PCW") means waters containing unused petroleum products and includes tank draw waters, tank cleaning waters/sludge, etc,
- Product containing materials such as fuel additives, pipeline lube or with greater than 5% ethanol are not considered PCW and special approval is required prior to shipment and acceptance.

AGREEMENT

(Additional terms and conditions on reverse side)

This document evidences the delivery by the company identified below ("Customer") and receipt by Sunoco LLC of PCW, sludge, petroleum transmix, or other product of the type and amount described above in the Product Information box. Customer acknowledges and agrees to the additional terms and conditions on the back of this form, and acknowledges receipt of a copy of the same.

NAME OF COMPANY: Brown Remediation
(Print Name of Company)
BY: Michael Gemmace
(Signature)
NAME: Michael Gemmace
(Print Name of Person Signing)
TITLE: Operator
(Print Title of Person Signing)
DATE: 8-4, 2025

1 2347958.8

BROWN REMEDIATION

227 Sandy Springs Place
Suite D-122
Atlanta, Georgia 30328-5918
Phone 404 256 0667
Fax 404 256 0668

Non-Hazardous Waste Manifest

Manifest No.: 10956 Project No.: AL 082506 Quantity in U.S. Gallons: 350

Section 1: Generator

Company Name: RJ's Service Station
Address: 10051 US Highway 431 South
City: Glenco State: AL ZIP:
Phone No.: Fax No.:

Location:
Address:
City: State: ZIP:
Phone No.: Fax No.:

Description of Waste: PCW

This is to certify that the above-named material is properly described and is in proper condition for transportation according to the applicable regulations of the Department of Transportation. I further certify that the above-named material is not a hazardous waste as defined by 40 CFR, Parts 261 and 279, or any applicable federal, state, or local laws.

Authorized Agent Signature Date

Section 2: Transporter

Primary

Company Name: Brown Remediation, Inc
Address: 227 Sandy Springs Place
Suite D-122
City: Atlanta State: GA ZIP: 30328
Phone No.: (404) 256-0667 Fax No.: (404) 256-0668
Driver Name: Michael Gammage
Truck No.: 7 Vehicle Tag: P4087B

Driver Signature 8-4-2025 Date

Secondary

Company Name:
Address:
City: State: ZIP:
Phone No.: Fax No.:
Driver Name:
Truck No.: Vehicle Tag:

Driver Signature Date

Section 3: Destination

Company Name: Sanco
Address:
City: Birmingham State: AL ZIP:
Phone No.: Fax No.:

I hereby certify that the above material has been accepted, and to the best of my knowledge, the foregoing is true and accurate.

Buddy Buddy 8/6/25
Authorized Agent Signature Date

R# 26628 B

White – Destination Yellow – Brown Remediation

APPENDIX D

MANUAL CALCULATIONS

FLOW RATE CALCULATION

No. of MEME Events Performed between 2020 and present: 39
Event Duration for each MEME Event (hrs): 8 hours
Event Duration for 39 MEME Events (hrs): 312 hours
Event Duration for 39 MEME Events (min): 18,720 mins

Total Gallons Recovered in 39 MEME Events: 10,174.5
Calculated gal/min: 0.54 gal/min

Estimated V From SLUG TEST

Average k = 4.99E-04 ft/min

V = k*$\frac{i}{n_e}$

Where: k = hydraulic conductivity

n_e = effective porosity

i = hydraulic gradient

The average hydraulic conductivity estimated from previously conducted slug tests was 4.99E-04 ft/min. The effective porosity for a silty clay sediment is approximately 0.10 (Ground-Water Hydrology and Hydraulics). The hydraulic gradient is calculated from recent potentiometric map of shallow and deep wells, which is approximately 0.169 ft/ft. The average linear velocity of flow was then calculated to be 8.4E-04 ft/min.

AVERAGE FLOW RATE PER WELL APPLIED DURING MEME EVENTS

	MWR-4D	RW-2	RW-1	MW-3	MW-14D
Average Applied Well Head Vacuum (2020-2025) (in/Hg)	**13.2**	**13.1**	**13.1**	**11.9**	**11.7**
Average Applied Well Head Vacuum for Five Wells (in/Hg) = 12.6					

The calculated average Air Flow for all extraction wells during the past 39 MEME events (2020-2025) is 313 SCFM.

APPENDIX E

Price Quotes from Sub-Contactors

MK ENVIRONMENTAL INC.

765 Springer Drive
Lombard, IL. 60148-6412
630-292-5472

jgiltz@mkenv.com

QUOTATION

Date	2/24/2026
Quote No.	225072D
Reference	RJ's Svc Station
Page No.	1 of 3
Freight	Included
Terms	See Notes
Ship Via	FLATBED
F.O.B.	Factory

SOLD TO:	SHIP TO:
Priyanka More Poly, Inc. 117 Gemini Circle, Suite 416 Birmingham, AL. 35209 205-332-0665	Facility ID 17846 RJ's Service Station 16051 US Highway 431 South Glencoe, AL.

Quotation valid for 30 days

QUANTITY		UNIT PRICE	AMOUNT
	400 amp 3/60/230 volt 4 wire plus ground electrical service Brought to NEMA 3R control Panel Interior electrical will comply with NEC requirements for Class 1, Division 2, Group D Hazardous locations Motors will be TEFC construction		
1	40 HP single stage oil sealed liquid ring blower or equal ~500 ACFM @ 20"Hg. Capacity 3/60/230-460 volt, 40 HP TEFC motor Direct drive motor Oil Scavenge line Backpressure gauge Air/Oil Separator Temperature gauge Y strainer with clean out plug High temperature switch low and high oil level switches inlet filter inlet check valve (1) extra 5-gallon bucket of seal oil for top off	146,992.00	$146,992.00
1	~200 gallon Air/water separator with conductivity probe level switches 10" diameter clean out ports with vacuum rated quick release lid Liquid filled vacuum gauge Vacuum assist hose tank drain valve Vacuum relief valve Dilution valve with filter/silencer Inlet screen		
1	1.5 hp transfer pump, 3450 rpm, TEFC motor Cast Iron housing with bronze impeller, anti air lock design manual "Pump ON" button inside building for sampling		
1	MKE Model S15b Stripperator or equal 15 GPM capacity Oil/Water Separator and air stripper treatment system Coalescing separator with product skimming weir Polyethylene coalescing pack with reduced spacing for efficient oil removal Low profile air stripper with 2 hp AMCA Type B spark resistant aluminum blower Nylon tube aeration air stripper for high mass removal rates with low maintenance Low, high, and high-high sump conductivity probes 12" clean out hatch Low blower pressure alarm Blower silencer		
1	1.5 hp transfer pump, 3450 rpm, TEFC motor Cast Iron housing with composite impeller, anti air lock design manual "Pump ON" button inside building for sampling		
1	Groundwater flow totalizer with pulse output for remote totalization Flow calibration button		
1	Master Control Panel System, Including: NEMA 3R control panel with blank front cover Swing out sub panel for gauges, control operators, and switches IEC Magnetic motor starters, safety switches, H-O-A controls Control transformer (8) intrinsically safe relays, (8) alarm indicator LED's, (16) output channels Hard wired relay logic (1) exterior GFCI utility outlet		

MK ENVIRONMENTAL INC.

Poly, Inc.
117 Gemini Circle, Suite 416

Date 2/24/2026
Quote No. 225072D
Reference RJ's Svc Station

QUANTITY		UNIT PRICE	AMOUNT
	System run time totalizing hour meter Blower low pressure alarm Anti-falsing alarm circuit to prevent nuisance tripping Auto-release restart timer for remote restarts via telemetry Three phase voltage and phase monitor Emergency E-stop LED red indicator light located on swing out sub panel Catox interlock controls		
1	Fused Main Disconnect Includes: 200 amp disconnect box mounted to the system building (1) Weatherhead with extension pole and bracket support (1) 200 amp Electric meter socket base installed		
1	400 amp meter socket base upgrade and a separate 100A disconnect for the catox power supply (Note: not needed if catox rental is not required)		
1	Wireless Telemetry Cellular connection Connection and monthly service fee to be billed separately Remote restart and shut down capabilities Data logging and alarm call out via text or email Wireless service will be supported and billed through MKE @ $160+tax/mo. (subject to change)		
1	Vacuum transducer integrated into telemetry system for real time monitoring, 4-20mA		
1	System building (refurbished) 8.5'W x 12'L x 9.5'H aluminum/steel enclosure, fully insulated with Removable sliding wall panels for ease of maintenance Exterior grade plywood floor, structural steel frame Includes 100 watt XP interior light, and removable center grate for ease of maintenance The breaker panel and control panel will be mounted on a vertical steel bracket attached to platform end. The bracket, panels and all conduits will allow for the removal of the enclosure panels by one person. 10" structural steel base with 4" steel cross members Steel corner posts and roof frame Continuous sheet aluminum roof for superior protection 12,000 BTU XP heater with XP thermostat.		
1	Equipment Electrical Installation Includes XP wiring, XP seal off connectors, liquid tight flexible conduit		
1	Equipment Mechanical Installation Includes mounting, piping and connectors		
2	Bag filter housings, stainless steel construction, piped in parallel 25 micron filter bags case of spare 25 micron, size 2 bag filters		
2	Activated polishing carbon beds filled with 200 pounds of reactivated carbon in each 1" inlet and outlet, piped in series		
	Notes: 1. Payment terms for the MK DPVE system package above will be pay when paid up to 180 days or two weeks after ADEM reimbursement which ever comes first.		

EQUIP. SUB TOTAL		$146,992.00
START UP/TRAINING		$2,500.00
FREIGHT		$2,500.00
NET TOTAL		$151,992.00

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

Jerry Giltz
MK ENVIRONMENTAL, INC.

Poly, Inc.
117 Gemini Circle, Suite 416

Date 2/24/2026
Quote No. 225072D
Reference RJ's Svc Station
Page No. 3 of 3

QUANTITY			UNIT PRICE	AMOUNT
	MK DPVE Offgas Treatment Page: (Add to the Net Total)			
	Offgas Option #1 - MK Catox Rental Package			
3	Month minimum rental commitment of an oxidizer unit, 300 SCFM capacity or equal Electric or gas oxidizer provided, based on availability at time of order. Month to month rental at the same rate unit successfully returned and inspected by the manufacturer. $4,000 per month (month 4+ at the same monthly rate until returned)	**ADD**	12,000.00	
1	MK rental oxidizer freight (before and after rental) Freight to site, off loading by others Return freight to MK factory after rental in completed, on loading & supervision by others	**ADD**	5,000.00	
1	AWS3 knock out tank prior to oxidizer to minimize condensed liquids from entering burner or vapor phase carbon bed.	**ADD**	1,250.00	
1	Oxidizer start up and training assistance Startup and training services for the oxidizer rental.	**ADD**	2,000.00	
	Offgas Option #2 - MK Vapor Carbon Purchase Package			
2	Vapor Phase Carbon Vessels - Dual phase offgas - piped in series VR-400 lbs drums 400 lb initial load each 4" plain pipe fitting Off loading, placement & piping provided by others Installed outside the system building by others $3,850 each	**ADD**	7,700.00	
1	Air to air heat exchanger (dual phase exhaust stream) for the offgas treatment prior to the carbon drums. To reduce the outlet temperature of the dual phase offgas stream to help knockout the condensate in the air stream. Includes an elevated stand to mount the heat exchanger and fit over the AWS-3 knockout drum. Includes starter controls for the heat exchanger motor in the master control panel. Located outside the system building.	**ADD**	7,500.00	

Notes:

1. Please allow up tp 2 weeks after power is installed for MK startup & training services.

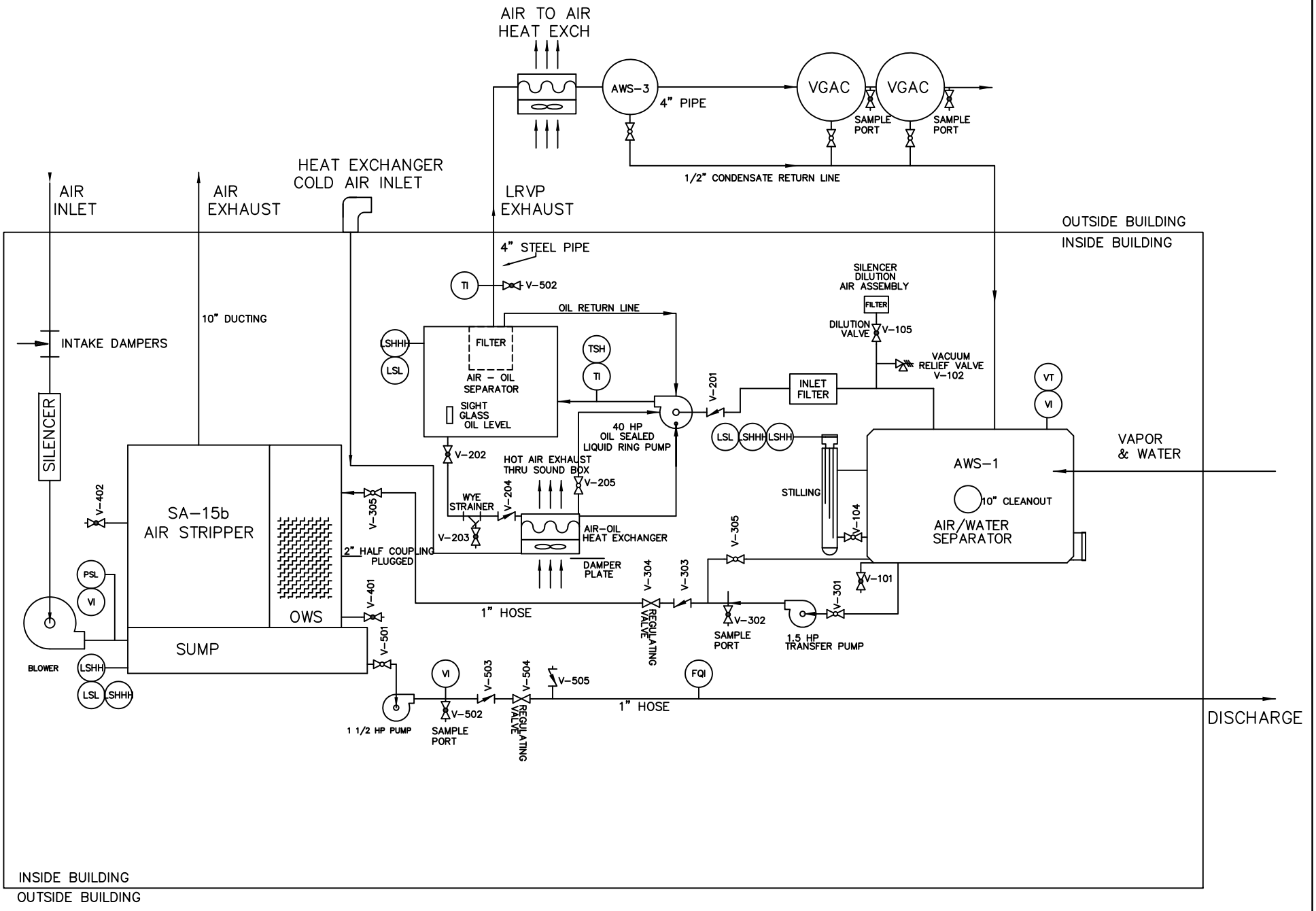
2. Oxidizer power terminations and interlock conduits w/wires will require to be ran prior to MK startup services. MK will provide a detailed wiring and conduit schedule.

3. Oxidizer rental clock starts the day of shipment from the CatOx factory. Rental clock stops upon receipt of the oxidizer rental back at CatOx factory & inspected.

EQUIP. SUB TOTAL	
EQUIP. SALES TAX	
START UP/TRAINING	
FREIGHT	
NET TOTAL	

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

Jerry Giltz,
MK ENVIRONMENTAL, INC.



V	VACUUM	I	INDICATOR
P	PRESSURE	FQI	FLOW QTY IND. (TOTALIZER)
S	SWITCH	FRI	FLOW RATE INDICATOR
L	LIQUID LEVEL OR LOW	T	TEMPERATURE

SCALE:	NONE
DESIGNED:	MET
CHECKED BY:	
DRAWN BY:	MET
DRAWN DATE:	

MK ENVIRONMENTAL INC.

PID

POLY, INC.
RJ'S SERVICE CENTER
GLENCOE, AL.

2	
1	

FIGURE NUMBER

M-2

ENVIRONMENTAL, INC. SUBMITTAL FOR:
POLY, INC. - RJs SERVICE STATION
SOIL EXCAVATION/BACKFILL AND CONCRETE FINISH - QUOTE FORM
PRICE IF CANOPY REMOVED BY OTHERS PRIOR TO MOBILIZATION
16051 US HWY 431 SOUTH, GLENCOE, ALABAMA

CATEGORY		Environmental, Inc.			
1	Mobilization (including per diem, PPE, and rental equip)	1	L.S.	$4,975.00	$4,975.00
2	Break Concrete, Exc. Soil, Truck to Stockpile (2 Days)	1	L.S.	$10,750.00	$10,750.00
3	Remobilize For Loadout, Trans, Disposal, & Backfill	1	L.S.	$1,700.00	$1,700.00
4	Labor/Equip to Loadout 232 YD^3 & Backfill	1	L.S.	$4,000.00	$4,000.00
5	Trans of (205 YD^3 Soil Exc & 27 YD^3 System Trench) to LF	14	Loads	$350.00	$4,900.00
6	Soil Disposal (232 YD^3 ~325 Tons)	325	Tons	$45.00	$14,625.00
7	#57 Backfill Stone	280	Tons	$53.50	$14,980.00
8	Pour/Finish Concrete	6	YD^3	$495.00	$2,970.00
9	Concrete Disposal	1	Load	$300.00	$300.00
Total					**$59,200.00**

Field Days Anticipated to Complete Work **2**

Tim Walker/Sr. Geologist - Remediation Manager — **2/19/2026**
Name/Title — **Date**

Timothy W. Walker
Signature

NOTES/ASSUMPTIONS:

1. **Prices good for 30 days.**
2. **We will have unobstructed access with no hinderance from aboveground/underground utilities, etc.**
3. **All work will take place during two mobilizations.**
4. **Excavated trench overburden will be stockpiled/disposed with soil excavated beneath canopy.**
5. **Soil will be accepted for disposal at Noble Hill Landfill in Attalla, AL.**
6. **Excavation backfilled with #57 crushed stone and topped w/6" of 4k PSI ready mix w/fiber.**
7. **Excavation will be 17' deep X 13' wide X 25' long.**
8. **Volume of trench soil is 27 YD^3 and soil excavated beneath canopy is 305 YD^3 for a total weight of 325 tons.**
9. **Costs provided are based on non-union labor, no prevailing wages, and no overtime included.**
10. **Canopy/supports will be removed prior to Environmental, Inc. primary mobilization.**

ENVIRONMENTAL, INC. SUBMITTAL FOR:
POLY, INC. - RJs SERVICE STATION
SOIL EXCAVATION/BACKFILL AND CONCRETE FINISH - QUOTE FORM
PRICE IF CANOPY MUST STAY
16051 US HWY 431 SOUTH, GLENCOE, ALABAMA

CATEGORY		Environmental, Inc.			
1	Mobilization (including per diem, PPE, and rental equip)	1	L.S.	$4,975.00	$4,975.00
2	Break Concrete, Exc. Soil, Truck to Stockpile (3.5 Days)	1	L.S.	$18,190.00	$18,190.00
3	Remobilize For Loadout, Trans, Disposal, & Backfill	1	L.S.	$1,700.00	$1,700.00
4	Labor/Equip to Loadout 232 YD^3 & Backfill	1	L.S.	$4,000.00	$4,000.00
5	Trans of (205 YD^3 Soil Exc & 27 YD^3 System Trench) to LF	14	Loads	$350.00	$4,900.00
6	Soil Disposal (232 YD^3 ~325 Tons)	325	Tons	$45.00	$14,625.00
7	#57 Backfill Stone	280	Tons	$53.50	$14,980.00
8	Pour/Finish Concrete	6	YD^3	$495.00	$2,970.00
9	Concrete Disposal	1	Load	$300.00	$300.00
Total					**$66,640.00**

Field Days Anticipated to Complete Work **3.5**

Tim Walker/Sr. Geologist - Remediation Manager — **2/19/2026**
Name/Title — **Date**

Timothy W. Walker
Signature

NOTES/ASSUMPTIONS:

1. **Prices good for 30 days.**
2. **We will have unobstructed access with no hinderance from aboveground/underground utilities, etc.**
3. **All work will take place during two mobilizations.**
4. **Excavated trench overburden will be stockpiled/disposed with soil excavated beneath canopy.**
5. **Soil will be accepted for disposal at Noble Hill Landfill in Attalla, AL.**
6. **Excavation backfilled with #57 crushed stone and topped w/6" of 4k PSI ready mix w/fiber.**
7. **Excavation will be 17' deep X 13' wide X 25' long.**
8. **Volume of trench soil is 27 YD^3 and soil excavated beneath canopy is 305 YD^3 for a total weight of 325 tons.**
9. **Costs provided are based on non-union labor, no prevailing wages, and no overtime included.**
10. **We can excavate on all sides of the middle canopy support without worrying about damage to support/canopy.**

ENVIRONMENTAL, INC. SUBMITTAL FOR:
POLY, INC. - RJs SERVICE STATION
SOIL EXCAVATION/BACKFILL AND CONCRETE FINISH - QUOTE FORM
PRICE IF ENVIRONMENTAL, INC. REMOVES CANOPY
16051 US HWY 431 SOUTH, GLENCOE, ALABAMA

CATEGORY		Environmental, Inc.			
1	Mobilization (including per diem, PPE, and rental equip)	1	L.S.	$4,975.00	$4,975.00
2	Break Concrete, Exc. Soil, Truck to Stockpile (3 Days)	1	L.S.	$14,625.00	$14,625.00
3	Remobilize For Loadout, Trans, Disposal, & Backfill	1	L.S.	$1,700.00	$1,700.00
4	Labor/Equip to Loadout 232 YD^3 & Backfill	1	L.S.	$4,000.00	$4,000.00
5	Trans of (205 YD^3 Soil Exc & 27 YD^3 System Trench) to LF	14	Loads	$350.00	$4,900.00
6	Soil Disposal (232 YD^3 ~325 Tons)	325	Tons	$45.00	$14,625.00
7	#57 Backfill Stone	280	Tons	$53.50	$14,980.00
8	Pour/Finish Concrete	6	YD^3	$495.00	$2,970.00
9	Concrete Disposal	1	Load	$300.00	$300.00
Total					**$63,075.00**

Field Days Anticipated to Complete Work **3**

Tim Walker/Sr. Geologist - Remediation Manager — **2/19/2026**
Name/Title — **Date**

Signature

NOTES/ASSUMPTIONS:

1. **Prices good for 30 days.**
2. **We will have unobstructed access with no hinderance from aboveground/underground utilities, etc.**
3. **All work will take place during two mobilizations.**
4. **Excavated trench overburden will be stockpiled/disposed with soil excavated beneath canopy.**
5. **Soil will be accepted for disposal at Noble Hill Landfill in Attalla, AL.**
6. **Excavation backfilled with #57 crushed stone and topped w/6" of 4k PSI ready mix w/fiber.**
7. **Excavation will be 17' deep X 13' wide X 25' long.**
8. **Volume of trench soil is 27 YD^3 and soil excavated beneath canopy is 305 YD^3 for a total weight of 325 tons.**
9. **Costs provided are based on non-union labor, no prevailing wages, and no overtime included.**
10. **Environmental, Inc. will retain the minimal proceeds from the canopy scrap value and any recyclable parts to offset project costs.**

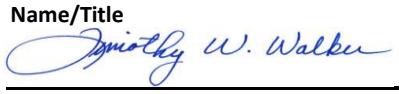
ENVIRONMENTAL, INC. SUBMITTAL FOR:
POLY, INC. - RJs SERVICE STATION
SYSTEM INSTALL/TRENCH/FINISH - QUOTE FORM
16051 US HWY 431 SOUTH, GLENCOE, ALABAMA

CATEGORY		Environmental, Inc.			
1	Mobilization (including per diem, PPE, and rental equip)	1	L.S.	$3,600.00	$3,600.00
2	Trench in Soil for Drain Line	100	feet	$12.00	$1,200.00
3	Backfill Drain w/overburden; finish w/grass, straw	100	feet	$17.50	$1,750.00
4	Trench in Asphalt for System Piping	300	feet	$30.00	$9,000.00
5	Provide/Install/Backfill 3/4" & 2" PVC Piping	740	feet	$10.50	$7,770.00
6	Install 2'X2'X2' Steel Vaults and Tie-In RWs	5	well	$2,225.00	$11,125.00
7	Pour/Finish Concrete w/4k PSI Ready Mix w/Fiber	11	YD^3	$456.00	$5,016.00
8	Build Manifold	1	L.S.	$4,950.00	$4,950.00
9	Build Gravel Pad & Offload/Level System w/Crane	1	L.S.	$9,850.00	$9,850.00
10	Ped/Auto Traffic Control Barricades Rental/Del/Daily Maint	1	L.S.	$4,850.00	$4,850.00
11	Install 8'H X 20'W X 30' L Wooden Privacy Fence	1	L.S.	$7,950.00	$7,950.00
12	Install 200A Electrical Service	1	L.S.	$5,150.00	$5,150.00
13	Site Cleanup	1	L.S.	$2,550.00	$2,550.00
Total					**$74,761.00**

Field Days Anticipated to Complete Work **10**

Tim Walker/Sr. Geologist - Remediation Manager — **2/19/2026**

Name/Title — **Date**



Signature

NOTES/ASSUMPTIONS:

1. **Prices good for 30 days.**
2. **We will have unobstructed access with no hinderance from aboveground/underground utilities, etc.**
3. **All system installation work will take place during one mobilization.**
4. **Trenches installed in asphalt and/or soil.**
5. **Poly/others will install recovery wells prior to EI mobilization.**
6. **EI will have permission to install trenches. No right-of-way interference anticipated.**
7. **Excavated trench overburden will be stockpiled/disposed with soil excavated beneath canopy.**
8. **Soil will be accepted for disposal at Noble Hill Landfill in Attalla, AL.**
9. **Trenches backfilled with #57 crushed stone and topped w/6" of 4k PSI ready mix w/fiber.**
10. **Trenches will be 18" deep.**
11. **Volume of trench soil is 27 YD^3 and volume of soil excavated beneath canopy is 305 YD^3.**
12. **Costs provided are based on non-union labor, no prevailing wages, and no overtime included.**
13. **Recovery well vaults will be installed in 4'X4'X6" thick fiber-reinforced concrete pads with #4 rebar.**
14. **Costs/assumptions are based on my 1/27/26 site visit, review of Poly's Site Map, Wellhead Details, and our experience with similar projects. No scope/distances/definite quantities provided. All distances scaled from site figure. Scope of work is based on EI's normal treatment system installation trenching/completion procedures.**

ENVIRONMENTAL, INC. SUBMITTAL FOR:
POLY, INC. - RJs SERVICE STATION
SOIL EXCAVATION/BACKFILL AND CONCRETE FINISH - QUOTE FORM
PRICE IF CANOPY REMOVED BY OTHERS PRIOR TO MOBILIZATION
16051 US HWY 431 SOUTH, GLENCOE, ALABAMA

CATEGORY		Environmental, Inc.			
1	Mobilization (including per diem, PPE, and rental equip)	1	L.S.	$4,975.00	$4,975.00
2	Break Concrete, Exc. Soil, Truck to Stockpile (2 Days)	1	L.S.	$10,750.00	$10,750.00
3	Remobilize For Loadout, Trans, Disposal, & Backfill	1	L.S.	$1,700.00	$1,700.00
4	Labor/Equip to Loadout 232 YD^3 & Backfill	1	L.S.	$4,000.00	$4,000.00
5	Trans of (205 YD^3 Soil Exc & 27 YD^3 System Trench) to LF	14	Loads	$350.00	$4,900.00
6	Soil Disposal (232 YD^3 ~325 Tons)	325	Tons	$45.00	$14,625.00
7	#57 Backfill Stone	280	Tons	$53.50	$14,980.00
8	Pour/Finish Concrete	6	YD^3	$495.00	$2,970.00
9	Concrete Disposal	1	Load	$300.00	$300.00
Total					**$59,200.00**

Field Days Anticipated to Complete Work **2**

Tim Walker/Sr. Geologist - Remediation Manager — **2/19/2026**
Name/Title — **Date**

Timothy W. Walker
Signature

NOTES/ASSUMPTIONS:

1. **Prices good for 30 days.**
2. **We will have unobstructed access with no hinderance from aboveground/underground utilities, etc.**
3. **All work will take place during two mobilizations.**
4. **Excavated trench overburden will be stockpiled/disposed with soil excavated beneath canopy.**
5. **Soil will be accepted for disposal at Noble Hill Landfill in Attalla, AL.**
6. **Excavation backfilled with #57 crushed stone and topped w/6" of 4k PSI ready mix w/fiber.**
7. **Excavation will be 17' deep X 13' wide X 25' long.**
8. **Volume of trench soil is 27 YD^3 and soil excavated beneath canopy is 305 YD^3 for a total weight of 325 tons.**
9. **Costs provided are based on non-union labor, no prevailing wages, and no overtime included.**
10. **Canopy/supports will be removed prior to Environmental, Inc. primary mobilization.**

ESTIMATE

Estimate # 32818
Issue Date: 2/16/2026

Client: Poly, Inc.
Priyanka More
117 Gemini Cir., Ste 416
Birmingham, AL 35209

Prepared By: J. Grantham
Project: Glencoe, AL 02/26
Geo Lab Project ID: ADEM-Glencoe, AL

Description	Quantity	Rate	Total
Mob/Demob for drilling services.	1	300.00	300.00
Cost per mile.	340	2.32	788.80
Overnight per diem rate: 2+ nights on the road -- $100 per day, per man	4	300.00	1,200.00
Cost per foot for 4" PVC well installation with HSA (ATV).	100	70.00	7,000.00
Cost per foot for 4" PVC well installation w/ 6" DTH Air-Hammer.	115	77.00	8,855.00
Air Compressor cost per day.	4	250.00	1,000.00
Cost per well pad for complete removal and onsite disposal.	3	115.00	345.00
Daily Rental of Track mounted skid steer	4	250.00	1,000.00
55 gal. drum, filled and staged onsite.	2	75.00	150.00
Cost per foot for 2" well abandonment by overdrilling and backfill with grout.	90	35.00	3,150.00

Estimated SOW:
Installing a total of five 4" PVC wells by overdrilling two existing 2" PVC wells to 45' bgs and one 4" PVC well to 35' bgs using HSA/ DTH air hammer/DPT. Two of the overdrills have difficult geology and may not be able to set the wells in the same hole as the previous well. Those two holes may have to be abandoned. The other two wells will be new 4" wells to 45' bgs in each using HSA/DTH Airhammer. All wells will have 20' of screen. Soil cuttings will be stockpiled on poly and covered for later disposal at the landfill after profiling by Poly. No surface completions. Development will be done by others. All locations are truck accessible.

Thank-you for Using Geo Lab. (Pricing valid for 90 days)

Total **$23,788.80**

Purchaser acknowledges their responsibility to call the 811 UPC prior to Geo Lab's arrival onsite, when scheduling.

SKETCH OF PROPOSED WORK
SIMPLIFIED W.E.

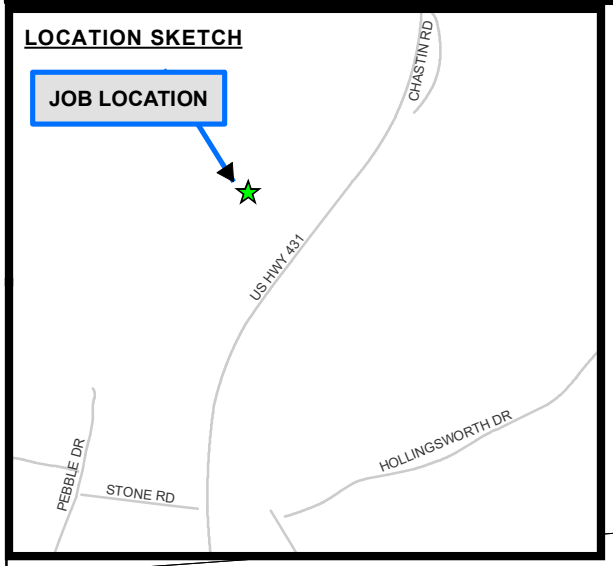
Map Center UTM		Map Center LatLong	
1969166	12309157	33.902179	-85.916204

Alabama Power

Customer:	Address:	Comm. Svc. Date	Division:	Operating Center:	Town/City:	Engineer:	Cell #:	Created:	Sheet:	Project:	Task:
POLY INC	16051 Hwy 431		Eastern	GADSDEN	GADSDEN	KELSEY WILSON	205-288-2073	2/20/2026	1 OF 1		

Job Description:
REPLACE 1Ø #4ACSR P&N WITH 3Ø #2ACSR P&N (348').
REPLACE 40/5 CREOSOTE POLE WITH 50/3CCA.
UPGRADE TO ENH GRNDS. HANG 3-15KVA CLOSED DELTA XFMR BANK 120/240V. REPLACE #2TPX SVC (100') W/ #1/0QUAD SVC (100'). SET 400A 120/240V 3Ø METER.

LOCATION SKETCH



LOC. 2
R : 40/5 CREOSOTE POLE
: 1Ø P&N DDE CONST
W/ (2) DEC, (2) INSPOLY
: (2) PRI GUYWIRE + (ABDN) ANCHOR
: STEEL T-BKT, CO & LA
: 15KVA XFMR [STA#12523]
: #2TPX SVC (100')
: 200A 120/240V METER
I : 50/3CCA W/ ENH GRNDS
: ENH GRND SIGN
: 3Ø FG DE 8' ARM
W/ (3) DEC, (3) INSPOLY
: 1Ø P&N DE CONST
W/ DEC, INSPOLY
: (2) PRI GUYWIRE + ANCHOR
: 3-15KVA 120/240V CLOSED DELTA BANK
[STA# T0-----]
: TRI-MOUNT BKT, COs & LAs
: #1/0QA SVC (100')
: 400A 120/240V 3Ø METER
RECONNECT SVC

LOC. 1
R : STEEL T-BKT, CO & LA
: 100 AQA FUSE [EC5475]
I : UPGRADE TO ENH GRNDS
: 3Ø FG DE 8' ARM
W/ (3) DEC, (3) INSPOLY
W/ (2) FG JUMPER PIN + INSPIN
: (3) FG BKT TO MOUNT COs & LAs TO DE ARM
: (3) CO, (3) LA, & (3) 30A QA FUSE [EC5475]
: 2Ø #2ACSR PRI (348')

Pri (kV)	Sec (V)
12KV	120/240

Phone Co ----
On Pole ----
CATV Co ----
On Pole ----
ROW AGENT **RYAN HILLEY**
ROW REQ'D **YES**
County **Calhoun**
Township **13S**
Range **07E**
Section **16**

Date:	Scale:	MISSALL #:	Renew By:	Notified:	Substation:	X:	Y:
	1 " = 143 '	-----	MM/DD/YYYY				
		Work Date: MM/DD/YYYY @	Expires: MM/DD/YYYY				

target ZERO Every day, every job, safely

N

APPENDIX F

SITE HEALTH AND SAFETY PLAN

Poly, Inc.

SITE HEALTH AND SAFETY PLAN

The health and safety of site workers is of primary concern and the goal of all projects involving substances of a hazardous nature, such as petroleum products. Poly's health and safety program includes medical surveillance (annually), employee training (40-hour OSHA and annual 8-hour updates), and the development and implementation of site-specific standard operating procedures (Site Health and Safety Plan provided in Appendix H). Personnel training involves hazardous substances identification, personal protective measures, monitoring equipment and practice sessions. The program is directed and enforced by the project Health and Safety Officer, and through Field Safety Coordinators who are assigned and trained for each project.

Potential hazards at any site can be divided into three categories: physical hazards, chemical hazards and biological hazards. As with all types of work involving heavy machinery, there is a risk of physical injury. This potential risk can be reduced by the use of proper protective equipment. However, site workers should be aware of the fact that when protective equipment, such as respirators, gloves, and protective clothing are worn while using heavy equipment, visibility, hearing, and manual dexterity may be impaired. In addition, the protective equipment required for some activities (coveralls and respirators) places physical strains on the wearer. Heat exhaustion or stroke is possible, especially during warm weather.

Personnel can be exposed to chemical hazards through four primary routes of exposures: Inhalation, ingestion, skin contact and eye contact. Exposure limitations can be monitored through the use of Permissible Exposure Limits (PELs), Short-Term Inhalation Limits (STILs), and Immediately Dangerous to Life and Health (IDLH) values. PELs are the concentrations of air contaminants that most workers can be exposed to for a 40-hour work week on a permanent basis with no significant health effects. These are enforceable OSHA standards adopted in 1970. STILs are the concentrations of air contaminants that most workers can inhale for a short period of time (30 minutes) without suffering chronic or irreversible damage. IDLHs are concentrations that represent the maximum level from which one could escape within 30 minutes without any impairing symptoms or irreversible health effects. The major concern during petroleum hydrocarbon investigations is the benzene component of various petroleum distillates, which is a known carcinogen. Benzene has a Threshold Limit Value (TLV) of 0.1 part per million (ppm), (proposed limit), which is the value given for the time-weighted average concentration for normal eight-hour day and a 40-hour work week to which all workers may be repeatedly exposed without adverse effect (OSHA, 29 CFR 1910). During all field activities, organic vapors are monitored to estimate air quality through the use of an FID or PID.

Ingestion of chemical hazards can be controlled on each site by prohibiting any eating, smoking, or drinking in the Exclusion Zone, and by requiring all field personnel to decontaminate themselves upon leaving the Exclusion Zone. Skin and eye contact with chemical hazards can cause serious burns, rashes, or irritations. Risks due to potential chemical hazards can be reduced by protection against exposure to toxic materials by utilizing appropriate personnel protective equipment.

Biological hazards may consist of exposure to pest organisms such as snakes, insects, and fire ant mounds. Field personnel are encouraged to use insect repellants and should always wear knee high chemically resistant boots when working on-site to protect feet and lower leg areas.

A comprehensive, carefully managed, and thoroughly documented Health and Safety Plan is crucial for the successful completion of any petroleum hydrocarbon investigation. The Health and Safety Plan is a site-specific document prepared to inform site personnel of potential hazards and specific responses should these hazards be encountered. This document is based

on careful reviews and evaluations of petroleum products present on-site, location of underground utilities, and location of the nearest medical facility, fire department, and the local emergency response agency. Site-specific criteria are subject to revision after a site reconnaissance by the Project Manager. Plans are designed to allow unanticipated site problems to be addressed while assuring adequate and suitable worker protection. All site personnel (geologist, engineers, drill crew, etc.) are required to follow the Health and Safety Plan. Typical personal protection equipment (Level D) that will be utilized and/or available at the site include the following items:

- Hard hats;
- Steel-toe rubber boots;
- Protective gloves (PVC, vinyl, etc.);
- Safety glasses; and
- First aid kit.

**** EMERGENCY PHONE NUMBERS ****

Bureau of Explosives ---------- (800) 933-4882

Chemtrec ---------- (800) 424-9300

DOT Hotline ---------- (202) 366-4488
Materials Transportation Bureau

Centers for Disease Control and Prevention ---------- (404) 633-5313
(Emergency Only)

Solid Waste and Emergency Response ---------- (202) 260-2180
Office of Emergency and Remedial Response

TSCA Assistance Information Services Hotline ---------- (404) 562-8990

HOSPITAL

Name Gadsden Regional Medical Center

Address: 107 Goodyear Ave, Gadsden, AL

Phone: (256) 494-40000

Travel Time: ~12 minutes

Directions: See attached

Map Attached: Yes

PARAMEDICS Name: Advantage EMS

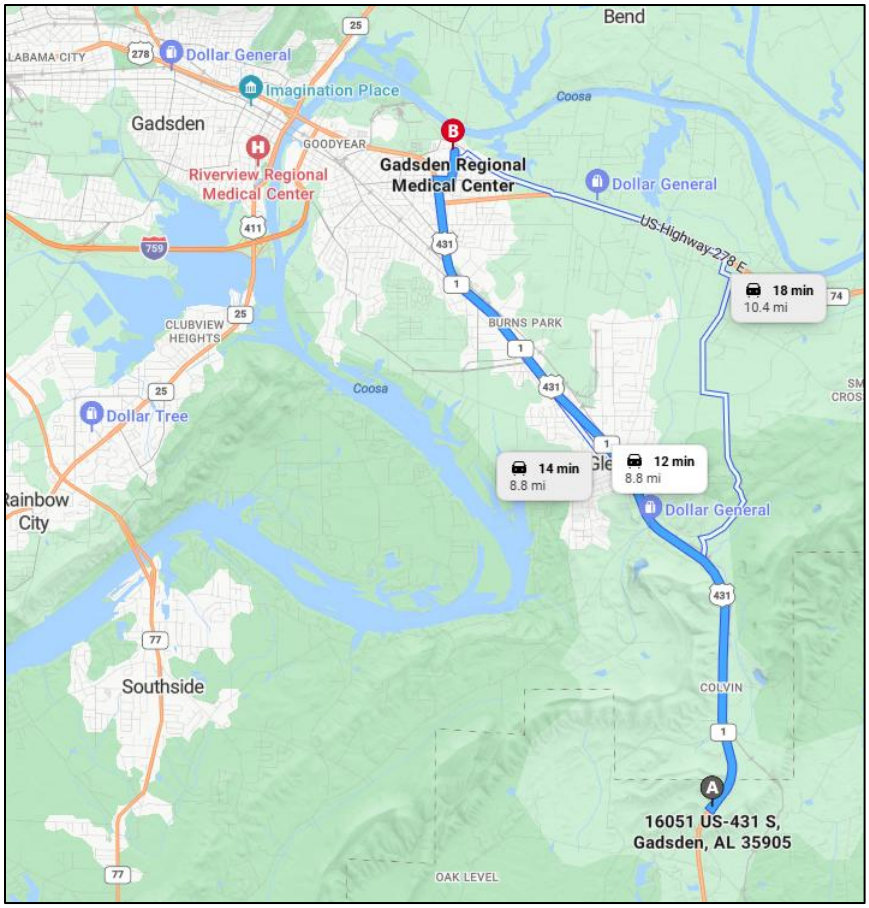
Phone: 911 (Emergency) – (256) 543-0911

FIRE DEPARTMENT: Name: Glencoe Volunteer Fire Department

Phone: 911 (Emergency) – (256) 442-2789

LOCAL POLICE Name: Glencoe City Police Department

Phone: 911 (Emergency) – (256) 492-1425



Via US-431 N — **12 min**

Fastest route · No delay — 8.8 mi

Close

A 16051 US-431 S, Gadsden, AL 35905

Leave from US Highway 431 S/US-431 S/AL-1
about 0.1 mi, less than 1 min

Make a U-turn at US Highway 431 S/US-431 N/AL-1
about 0.2 mi, less than 1 min

Follow US Highway 431 S/US-431 N/AL-1
8 mi, about 9 min

Turn right onto Hoke St
about 0.2 mi, less than 1 min

Turn left onto Wilbanks Ave
0.3 mi, about 2 min

You have arrived at Wilbanks Ave. Your destination is on the left

B Gadsden Regional Medical Center

All personnel have read the above plan and are familiar with its provisions. All personnel have received medical surveillance and training in compliance with the Poly, Inc Health and Safety Policy.

NAME	SIGNATURE/DATE