



SHOP N FILL #15 TEXACO

CAP DEVELOPMENT REPORT

ATTF CP-30

APRIL 27, 2026



1652 US Highway 280
Kellyton, Coosa County, Alabama

FAC ID 10642-037-017769
UST 19-07-08

PREPARED FOR

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

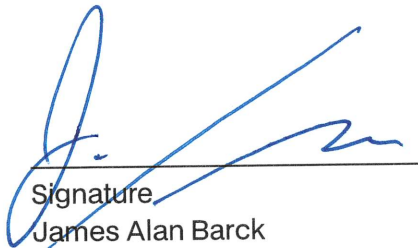
PREPARED BY

Three Notch Group, Inc.
700 Southgate Drive, Suite A
Pelham, Alabama 35124

CERTIFICATION PAGE

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

This document has been prepared based on historical site assessment data and has been prepared to address soil and groundwater contamination at the Shop N Fill #15 Texaco site (Facility Identification Number 10642-037-17769) in Kellyton, Coosa County, Alabama. The recommended action should not be construed to apply to any other site.



Signature

James Alan Barck

Registered Professional Engineer in the State of Alabama

Registration No. 32719



4-24-26

Date

SITE LOCATION AND HISTORY

The Shop N Fill #15 Texaco facility currently operates as a convenience store and gasoline station. Reportedly, the underground storage tank (UST) system consists of one 10,000-gallon unleaded gasoline UST, one 10,000-gallon midgrade gasoline UST, one 10,000 premium grade UST and one 6,000-gallon diesel tank. Gasoline fueling dispensers are located beneath the canopy and one diesel fueling dispenser is located to the north of the gasoline UST tank hold. The Alabama Tank Trust Fund (ATTF) responsible party for the Shop N Fill #15 Texaco site is Bowden Oil Company, Inc.

Land use surrounding the site is a mix of commercial and residential properties. The site is bound on the east by US Highway 231 (Oates Street) followed by commercial property, on the north by commercial properties, on the west by a multi-family manufactured housing park, and to the south by vacant property. Public drinking water, electric, fiber optic, and gas utilities are available in the general vicinity. On-site underground utilities include water, storm water, and fiber optic and are located on the southern boundary of the property. Electric services are overhead at the property. Surface drains are located throughout the property. There are no public water supply wells located within one mile and no private water wells were identified within 1,000 feet of the facility.

The following report summarizes the Corrective Action Plan (CAP) Development, as requested in the ADEM letter dated January 6, 2026 under cost proposal CP-26.

SUMMARY OF PREVIOUS SITE INVESTIGATIONS

In July 2019, a Limited Phase II ESA was conducted by Technical Services Company at the site. Results of the Limited Phase II ESA indicated chemicals of concern (COCs) concentrations above the Alabama Department of Environmental Management (ADEM) Initial Screening Levels (ISLs), resulting in a reportable release. ADEM issued a Notification of Requirement (NOR) to conduct investigative and corrective actions at the site.

The Preliminary Investigation was completed, and the report was submitted to ADEM in November 2019. Upon review of the Preliminary Investigation report, the ADEM requested that a Secondary Investigation be conducted and approved the Secondary work plan and corresponding cost proposal in correspondence dated January 28, 2020. Three Notch Group (Three Notch) mobilized to the Shop N Fill #15 facility to conduct the Secondary Investigation on April 28, 2020.

Eleven soil borings (MW-5 through MW-10, RW-1 through RW-4, and VW-1), which were converted into seven monitoring wells and four recovery wells, were installed at the site on April 29-30 and May 4-5, 2020. The total depth of the borings ranged from approximately twenty-four feet below land surface (ft-bls) to approximately fifty-one ft-bls. The soil beneath the site generally consists of red, tan, and brown medium to fine grained, loose, silty to sandy clays and clayey sands with slight plasticity. The site is located in the Ashland—Wedowee Belt of the Northern Piedmont physiographic province. Groundwater was encountered at depths ranging from approximately 16 to 24 ft-bls during drilling activities. The Shop N Fill #15 Texaco facility is located within the Metagranite Aquifers system. Bedrock was encountered in two of the borings (MW-6 and MW-7) installed during the Secondary Investigation.

To date, twenty-one groundwater monitoring events have been conducted at the site between September 2019 and January 2025. Additionally, twenty-five MEME events have been conducted between March 2021 and February 2024.

A High-Resolution Site Characterization (HRSC) study was conducted from July 15 through 19, 2024. A total of twenty-four soil borings were advanced across the site to depths ranging from 25 to 36 feet below land surface (ft-bls) to help define the horizontal and vertical extent of the contaminant plume beneath the site. The results are summarized in a report submitted in September 2024.

The monitoring well network currently consists of seven 2-inch Type II monitoring wells (MW-2, MW-4, MW-5, and MW-7 through MW-10), eight 4-inch Type II monitoring wells (MW-1, MW-3, and RW-1 through RW-6), and one Type III monitoring well (VW-1).

The data summary tables are included in Appendix A and site figures are included in Appendix B.

SUMMARY OF PREVIOUSLY CONDUCTED CORRECTIVE ACTION

MEME events have been conducted periodically at the site between March 2021 and February 2024.

REMEDIAL OBJECTIVES AND EXPOSURE ASSESSMENT

General Remedial Objectives

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

- Ensure that the health and safety of all project personnel is maintained during remediation activities.
- Prevent hydrocarbon migration to sensitive receptors.
- Remove free product from the site subsurface, if present.
- Reduce adsorbed phase petroleum hydrocarbons from soils within the vadose and saturated zone, primarily in the source area, to below approved SSTLs.
- Reduce dissolved petroleum hydrocarbons from groundwater to below approved SSTLs.
- Accomplish these objectives within the proposed period of operation.

Exposure Assessment

An exposure assessment was conducted by Three Notch Group, Inc. (Three Notch) during the preparation of an ARBCA evaluation dated February 17, 2021. The following receptor survey information has been drawn from the ARBCA Tier II evaluation report:

Receptor Type	Actual Receptor	On-site/ Off-site	Pathway Status
Commercial Sites	Commercial 10 hr/day	On-Site	Current: Complete for soil and groundwater vapor inhalation Future: Complete for soil and groundwater vapor inhalation and dermal contact with surficial soil
	Commercial 10 hr/day	Off-Site	Current: Complete for soil and groundwater vapor inhalation Future: Complete for soil and groundwater vapor inhalation and dermal contact with surficial soil
Construction Sites	Construction Workers	On-Site	Current: Complete for soil and groundwater vapor inhalation Future: Complete for soil and groundwater vapor inhalation and dermal contact with surficial soil
	Construction Workers	Off-Site	Current: Complete for soil and groundwater vapor inhalation Future: Complete for soil and groundwater vapor inhalation and dermal contact with surficial soil
Residences	Resident 24 hr/day	On-Site	Current: Not Complete Future: Not Complete
	Resident 24 hr/day	Off-Site	Current: Complete for soil and groundwater vapor inhalation Future: Complete for soil and groundwater vapor inhalation and dermal contact with surficial soil

The current land use site conceptual exposure model indicates that complete exposure pathways do not exist for indoor or outdoor vapor inhalation from soil and groundwater

for on-site residents, but do exist for indoor and outdoor vapor inhalation from soil and groundwater for commercial workers and construction workers. Complete exposure pathways also currently exist off-site for indoor and outdoor vapor inhalation from impacted soil and groundwater and for dermal contact with surficial soil for residents, commercial workers, and construction workers. Future land use of the site and the surrounding area is expected to remain the same. There are no public water supply wells located within one mile and no private water wells were identified within 1,000 feet of the facility.

Specific Remedial Objectives

As part of the ARBCA Tier II evaluation process, SSTLs were calculated for the various media (soil and groundwater) at the site based upon the site exposure assessment. The SSTLs were calculated in the ARBCA evaluation submitted on February 17, 2021 and were approved by ADEM under CP-08. A summary of the approved Tier II SSTLs is presented in Appendix D.

RECENT MONITORING ACTIVITIES, RESULTS, AND COMPARISONS TO SSTLS

ADEM requested the development of a CAP that would address both soil and groundwater contamination at the site. As part of the CAP development, current representative concentrations for the Contaminants of Concern (COC) are needed in the evaluation and design of a plan to effectively treat and reduce contaminants. The site has had multiple approved groundwater monitoring and MEME events conducted. The most recent groundwater monitoring event was completed on January 15, 2026 under CP-28. The following details the activities and results of the January 15, 2026 groundwater monitoring event. A complete report detailing these activities was submitted by Three Notch on March 5, 2026. This CAP Development Report compares the analytical data to the proposed SSTLs that are presented in the ARBCA Evaluation for GRP Values report conducted in February 2021.

Groundwater Monitoring Activities

Personnel from Three Notch mobilized to the site on January 15, 2026 to collect groundwater samples for COC, which include benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl tertiary-butyl ether (MTBE), and naphthalene analysis. Upon arriving at the site, the technician removed the well caps from a suite of ten monitoring wells and the water levels in the wells were allowed to stabilize. Potentiometric levels were then measured with an electronic oil/water interface probe and recorded in the site field book. Monitoring well RW-6 was dry and could not be sampled. Based on the results from the January 15, 2026 groundwater monitoring event, the groundwater flow direction beneath the site is generally to the west. After all measurements were completed, each of the nine monitoring wells sampled was properly purged in preparation for groundwater sampling activities. Approximately 123 gallons of purge water were removed from the wells, stored in a drum, and treated using a portable carbon unit prior to being discharged on-site. A sample of the treated water was collected for BTEX/MTBE/Naphthalene analysis to verify that the carbon did not have breakthrough.

Groundwater samples were collected from nine monitoring wells for BTEX/MTBE/Naphthalene analyses using new, disposable bailers and transferred to 40 mL glass VOA vials preserved with HCl. The samples were placed on ice and transported under chain of custody to Waypoint Analytical where they were analyzed by EPA Method 8260B for the presence of BTEX/MTBE/Naphthalene constituents. Three Notch's Quality Assurance/Quality Control Plan is located in Appendix E and the site's Health and Safety Plan is located in Appendix F.

Laboratory Analytical Results

The BTEX/MTBE/Naphthalene analyses for this event indicate that COC concentrations were present at the site at levels above the Groundwater Resource Protection (GRP) SSTLs in four (MW-1, MW-3, RW-1, and RW-4) of the nine sampled monitoring wells. All COC concentrations were reported to be below the established SSTLs for Indoor Air Inhalation. The concentrations above the approved and proposed SSTLs are as follows:

	<u>COC</u>	<u>GRP SSTLs</u>	<u>Indoor Inhalation</u>	<u>Concentration</u>
MW-1	Benzene	0.435 mg/L	168 mg/L	16.1 mg/L
MW-3	Benzene	0.435 mg/L	168 mg/L	15.1 mg/L
RW-1	Benzene	0.435 mg/L	168 mg/L	20.0 mg/L
	MTBE	1.74 mg/L	48,000 mg/L	4.06 mg/L
RW-4	Benzene	0.435 mg/L	168 mg/L	1.16 mg/L

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

Groundwater Contamination and Site Conditions

Based on the exposure assessment, complete exposure pathways exist or will exist in the future for on-site and off-site commercial and construction workers. Current soil and groundwater concentrations were compared to the approved and proposed SSTLs determined in the ARBCA evaluation.

Based upon the January 15, 2026 sampling event, benzene concentrations were present at the site at levels above the GRP SSTLs in four of the nine sampled monitoring wells (MW-1, MW-3, RW-1, and RW-4). No wells sampled had concentrations above the Indoor Air Inhalation SSTLs. Free product has not historically been observed at the site.

REMEDIATION RATIONALE AND APPROACH

Based upon current constituent concentrations and the risk assessment results, there are exceedances in the groundwater resource protection SSTLs for benzene.

Full-scale technologies addressing both soil and groundwater were reviewed for applicability to the Shop N Fill #15 Texaco site. The discussion was divided into media

(soil and groundwater) and in-situ/ex-situ technologies and was presented in the CAP Evaluation Report dated August 31, 2025. ADEM approved the CAP Evaluation Report on November 5, 2025 to proceed with Cool-Ox injections as the chosen corrective action technology.

Three Notch recommends advancing soil borings through the use of direct push technology (DPT) for the pressure injection of chemical oxidation products within the target zone provide initial contact treatment and long term molecular oxygen production for enhanced biological degradation of remaining contaminants at the site. Three Notch recommends that the injection equipment and chemicals be provided by DeepEarth Technologies, Inc (DTI) for the implementation of this remedial approach. Implementation of the proposed technology will require the issuance of a UIC Injection Permit from ADEM. The UIC permit has been applied for and is currently under review by the ADEM Water Division.

Natural attenuation could be considered as the sole method for future remediation once dissolved hydrocarbon concentrations have dropped to levels where natural processes can effectively attenuate the residual hydrocarbon constituents. Natural attenuation is the process by which dilution, volatilization, biodegradation, adsorption, and chemical reactivity are allowed to reduce contaminant concentrations to acceptable levels. As a general rule, decreasing trends indicate these natural attenuation processes are occurring.

REMEDIATION RECOMMENDATION PLAN

To address the soil and groundwater contamination at the site, Three Notch proposes to inject the chemical oxidant compound Cool-Ox®. Cool-Ox® is a hydrogen peroxide-based technology designed to address a wide variety of remedial challenges presented by organic contaminants in various types of soil (especially clay) and groundwater. Unlike Fenton chemistry where liquid hydrogen peroxide is used as the source of the oxidizing radicals, the Cool-Ox® technology uses an aqueous suspension of solid peroxygen compounds. These compounds hydrolyze to generate hydrogen

peroxide in the proximity of the contaminants. A key to the success of the technology is that the relative insolubility of these compounds allows the oxidizers to be produced over an extended period of time (up to three months). This long term production of oxidizer greatly enhances the probability of the oxidizing compounds contacting the contaminants as well as providing an ongoing source of molecular oxygen for the enhancement of aerobic microbial proliferation. A copy of DTI's proposal is included in Appendix C. This product works to efficiently degrade petroleum constituents without generating heat or causing corrosion.

Injection Borings

Based in historical soil and groundwater concentrations at the site, a target area encompassing approximately 8,000 square feet in the central portion of the site adjacent to the canopy and product dispenser location has been identified for treatment. In order to facilitate injection activities and achieve the necessary contact between hydrocarbon impacted soil and groundwater and injection fluid, a vertical treatment interval from 10 feet below land surface (ft-bls) to 25 ft-bls is recommended, resulting in a total treatment volume of approximately 4,444 cubic yards. DTI has recommended a treatment grid with a total of 222 DPT borings at a spacing of 6 feet in order to provide coverage of the target area. The locations of the proposed injection borings are included in Appendix B.

Injection Activities

Over an estimated period of fifteen days, approximately 26,667 gallons of Cool-Ox® solution will be injected into the DPT injection borings. DTI recommends an application volume of approximately 120 gallons of solution per each injection boring. Each boring will be advanced to a depth of 25 ft-bls with injection being initiated at terminus and continuing until reaching 10 ft-bls at a rate of approximately 8 gallons per vertical foot. The final injection solution concentration will be dependent on injection rates.

Post-Injection Monitoring

Sampling of all monitoring wells is recommended on a quarterly basis to monitor the overall effectiveness and to facilitate adjustments in future injection events as needed.

The first post-injection groundwater monitoring event will be conducted no sooner than sixty to ninety days after injection activities. Subsequent events will be conducted at approximate ninety-day intervals.

The groundwater samples will be collected from the monitoring wells using new clean plastic bailers and transferred to 40 milliliter (mL) glass volatile organic analysis (VOA) vials preserved with hydrochloric acid (HCl) for BTEX, MTBE, and naphthalene analysis in accordance with EPA Method 8260B. During each groundwater sampling event, all monitoring wells will also be sampled for natural attenuation parameters (DO, pH, ORP) and any parameters required by the UIC Permit.

Following four quarterly groundwater monitoring events, Three Notch will recommend the site for No Further Action (NFA) status if remediation goals have been met. Should target levels continue to exceed the SSTLs in the source area after one year of monitoring and the contaminant plume maintains a stable or decreasing trend, groundwater monitoring should be continued. If COC concentrations increase based on future monitoring results, the CAP approach should be re-evaluated, with an additional injection event possibly being required.

PROPOSED REPORTING REQUIREMENTS

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

Corrective Action Implementation – This report will include analytical results of the baseline sampling event, details of the injection activities, and copies of all permits issued to date.

Corrective Action – Post-Injection GWM Reports – Three Notch proposes to submit quarterly post-injection groundwater monitoring reports, which will summarize field activities and the progress of site groundwater constituent concentrations towards achieving approved target levels. The following data will be included in each report: field

activities performed, groundwater elevations, groundwater analytical results as compared to target levels, potentiometric surface maps, and constituent concentration maps. The reports will also include remediation effectiveness and recommendations concerning additional measures deemed necessary.

Request for Closure Evaluation of Corrective Action - This report will include data that shows that remediation goals have been achieved and request a status of NFA. Methods for abandonment of monitoring and injection wells will be described.

Site Closure Report - This report will describe in detail the closure of the site and removal of all wells.

SCHEDULE OF IMPLEMENTATION

It is anticipated that the proposed remedial approach will be initiated within 30 days of approval of the CAP. It is anticipated that the equipment and products can be purchased and delivered within 60 days of vendor notification. Consequently, the remedial approach can be initiated approximately 100 days after approval of the CAP. The following schedule indicates the timetable for major project events to be completed as part of this corrective action plan:

Time Following CAP Approval (months)	Project Event	Project Event Length
0 – 24	Quarterly groundwater monitoring, evaluation of performance, and recommendations for further corrective action if required	2 Years
25	Well abandonment; completion and submittal of final report if allowable by ADEM	2 Months

CONCLUSIONS AND RECOMMENDATIONS

The CAP Development for the Shop N Fill #15 Texaco site proposes the use of chemical oxidant (Cool-Ox®) injections to remove adsorbed and dissolved phase COCs. Concentrations of COC compared to the proposed SSTLs indicate a target area of contamination in the southern and central portions of the site adjacent to the canopy and product dispensers that should be addressed.

Once the CAP Development Plan has been approved, Three Notch recommends that a baseline groundwater monitoring event be conducted. Three Notch then recommends that injection activities be conducted by DTI based on the proposed injection plan. Approximately ninety days after injection, Three Notch will sample the wells to monitor the effects of the injection. Three Notch proposes that a total of four post-injection sampling events be conducted on a quarterly basis to ensure concentrations remain below target levels and rebound is not occurring. DTI believes that a single treatment will show reductions in the remaining soil and dissolved phase constituents; however, an additional injection event, likely smaller in scope, may be necessary to reach treatment goals. Three Notch will consider an additional injection activity if groundwater concentrations remain above target levels.

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 **THREE
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GROUP**

TABLES

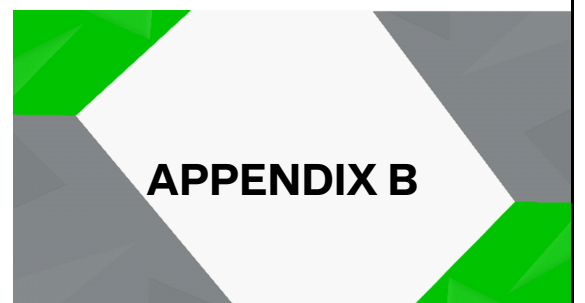


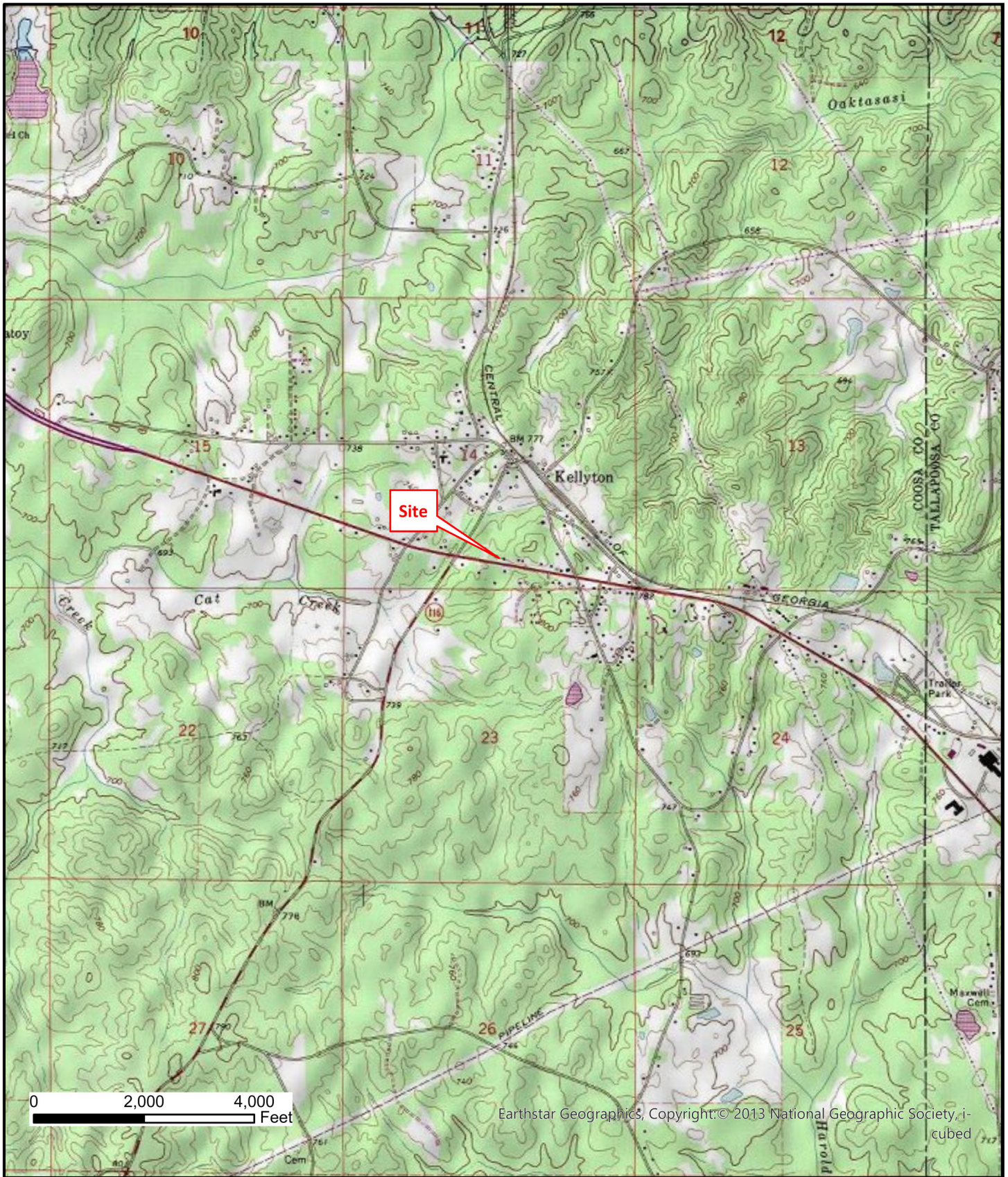
APPENDIX A



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FIGURES



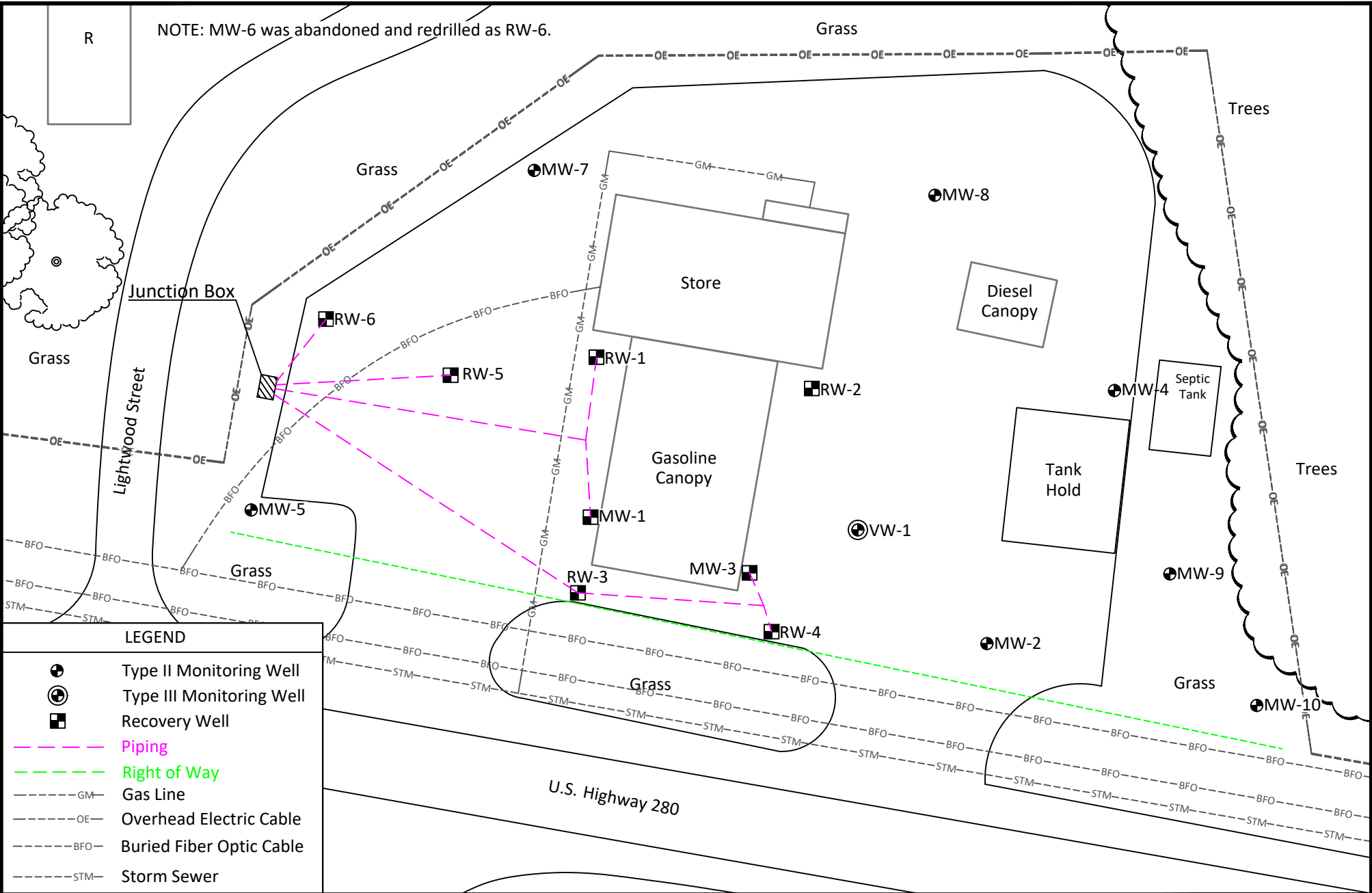


Site Location USGS Topographic Map










Shop N Fill #15 Texaco
1652 U.S. Highway 280
Kellyton, Coosa County, Alabama



NOTE: MW-6 was abandoned and redrilled as RW-6.



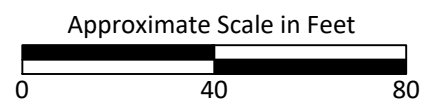
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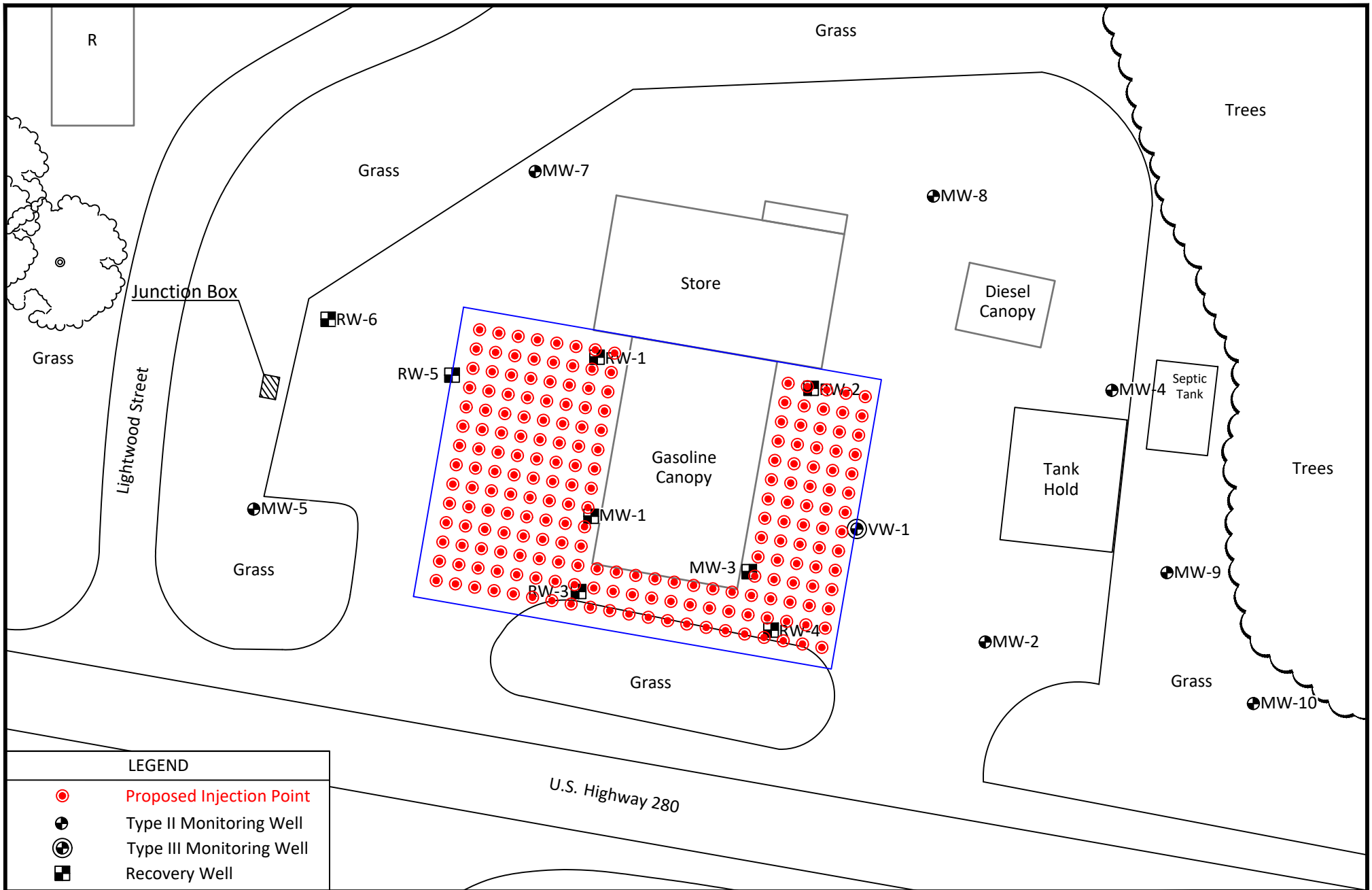
-  Type II Monitoring Well
-  Type III Monitoring Well
-  Recovery Well
-  Piping
-  Right of Way
-  Gas Line
-  Overhead Electric Cable
-  Buried Fiber Optic Cable
-  Storm Sewer



Site Map with Utility and Well Locations

Shop N Fill #15 Texaco
 1652 U.S. Highway 280
 Kellyton, Coosa County, Alabama





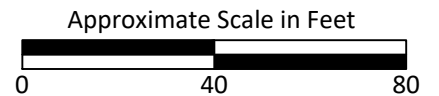
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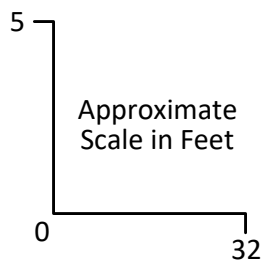
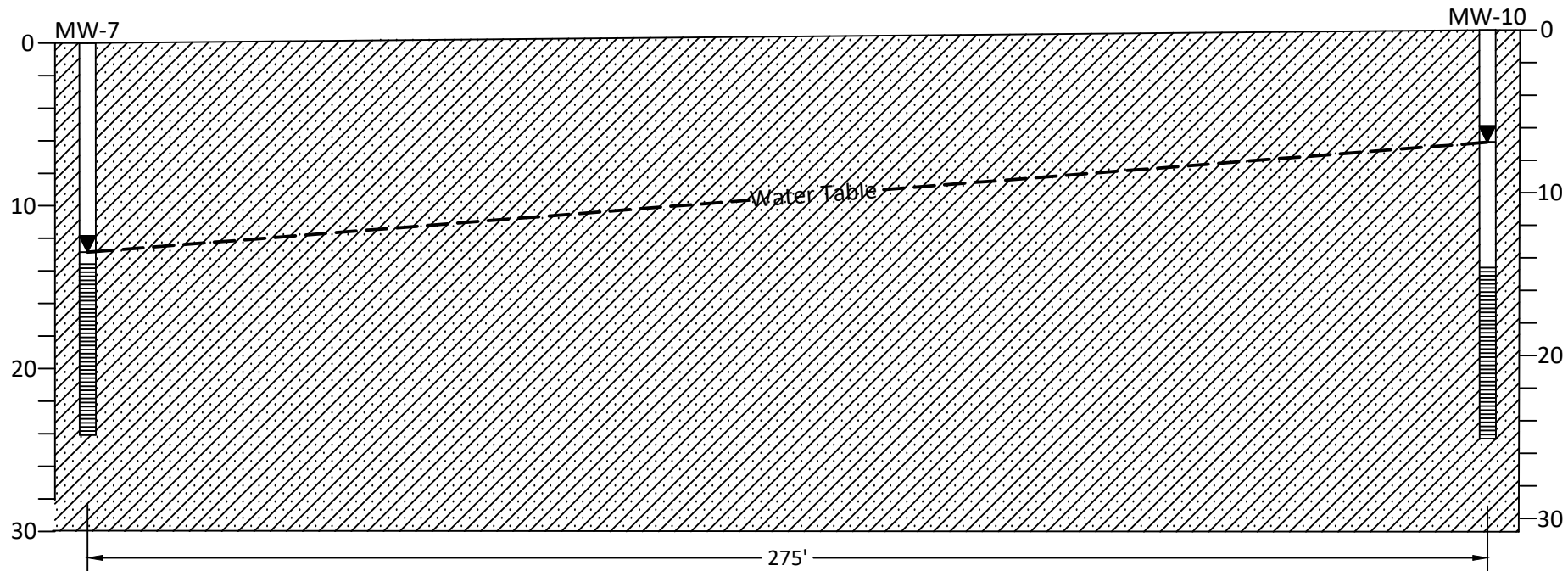
- Proposed Injection Point
- Type II Monitoring Well
- ⊕ Type III Monitoring Well
- Recovery Well



Proposed Injection Point Locations Map

Shop N Fill #15 Texaco
 1652 U.S. Highway 280
 Kellyton, Coosa County, Alabama





Lithologic Cross-Section

Shop N Fill #15 Texaco
1652 U.S. Highway 280
Kellyton, Coosa County, Alabama

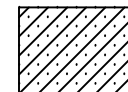
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Screened Interval



Groundwater Level

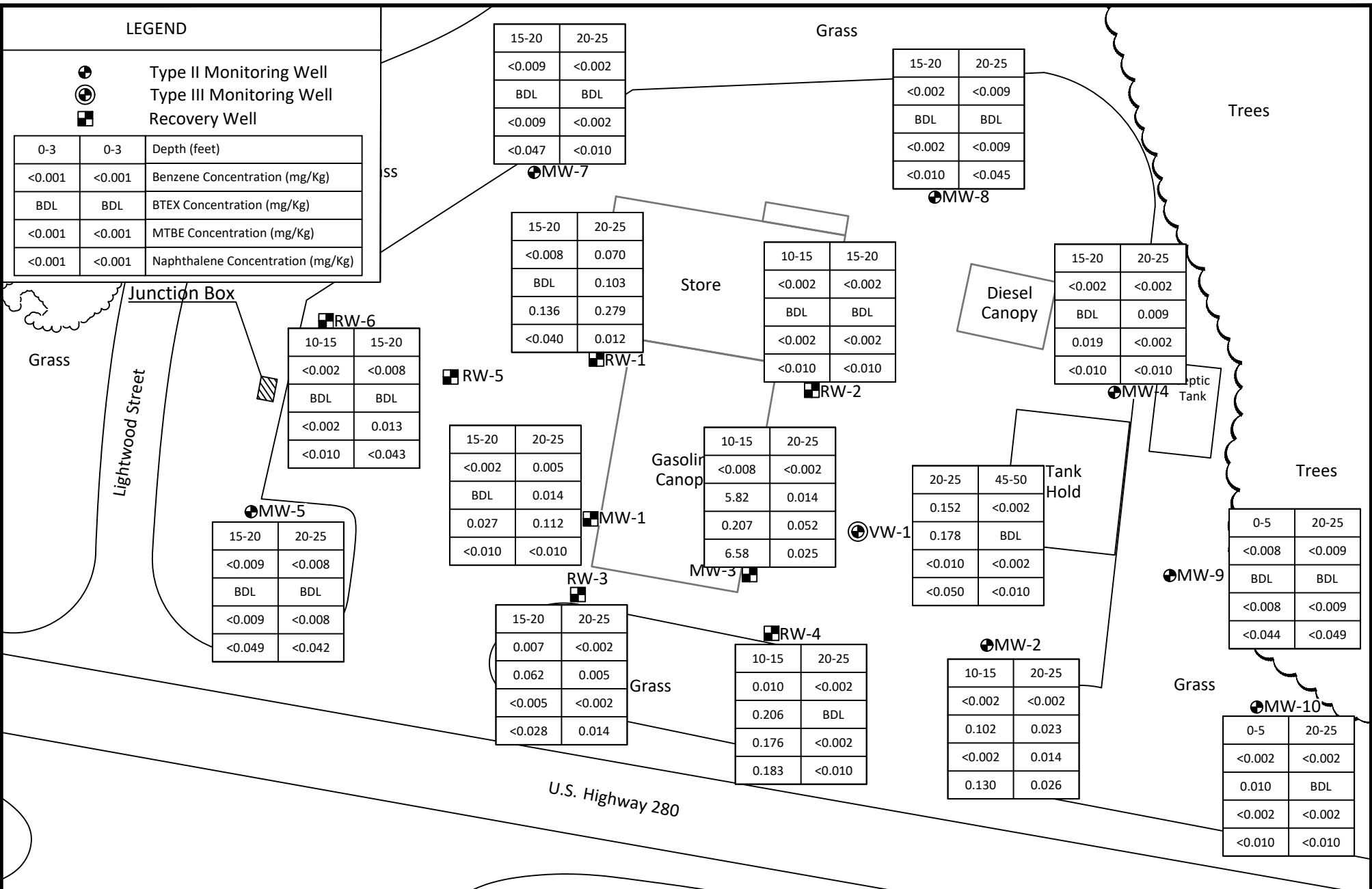


Sandy Clay

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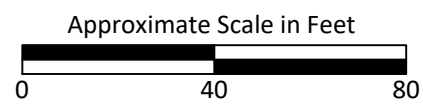
- Type II Monitoring Well
- Type III Monitoring Well
- Recovery Well

0-3	0-3	Depth (feet)
<0.001	<0.001	Benzene Concentration (mg/Kg)
BDL	BDL	BTEX Concentration (mg/Kg)
<0.001	<0.001	MTBE Concentration (mg/Kg)
<0.001	<0.001	Naphthalene Concentration (mg/Kg)








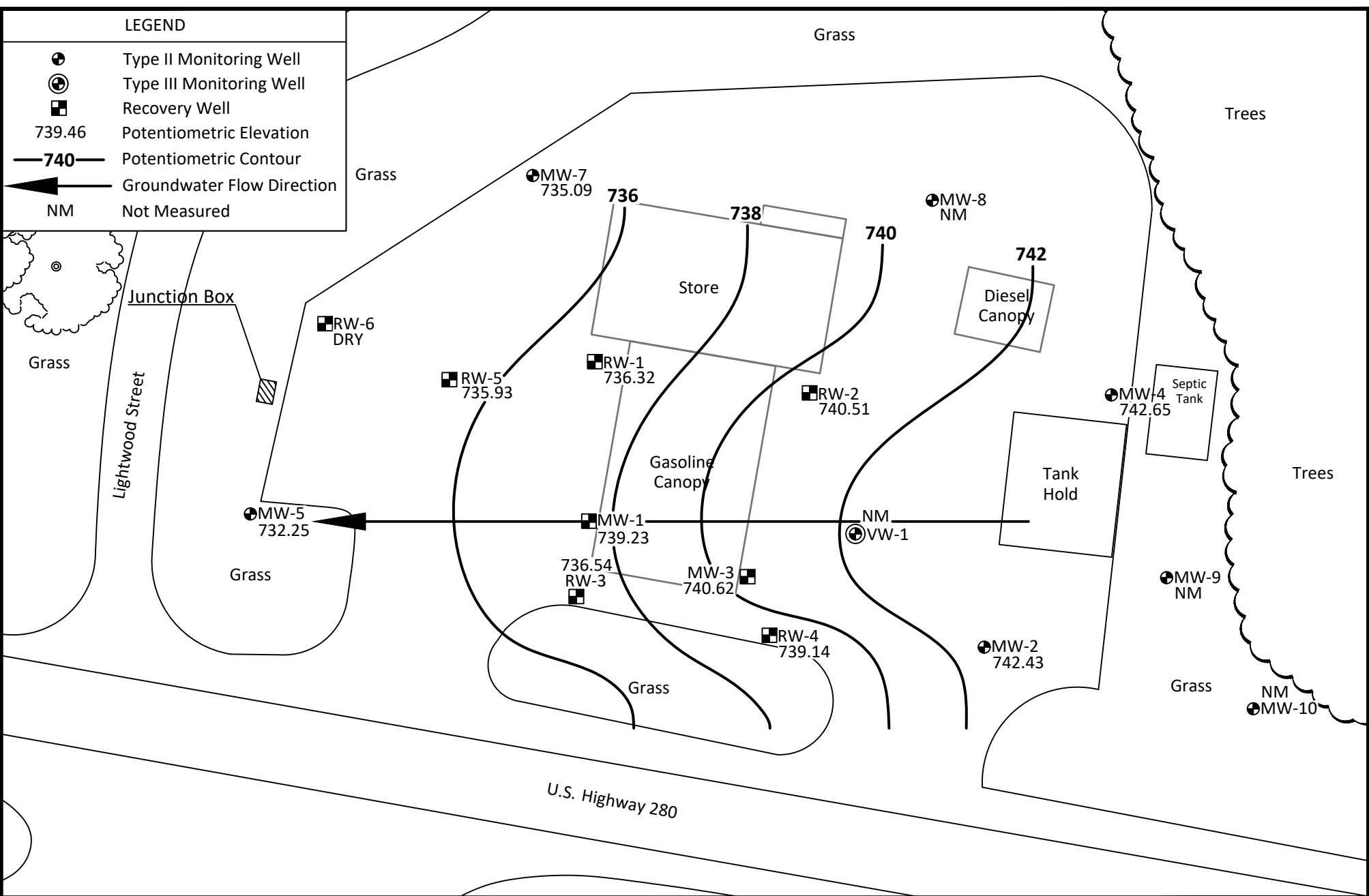
Soil Analytical Map

Shop N Fill #15 Texaco
1652 U.S. Highway 280
Kellyton, Coosa County, Alabama



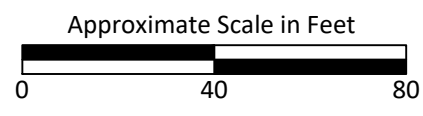
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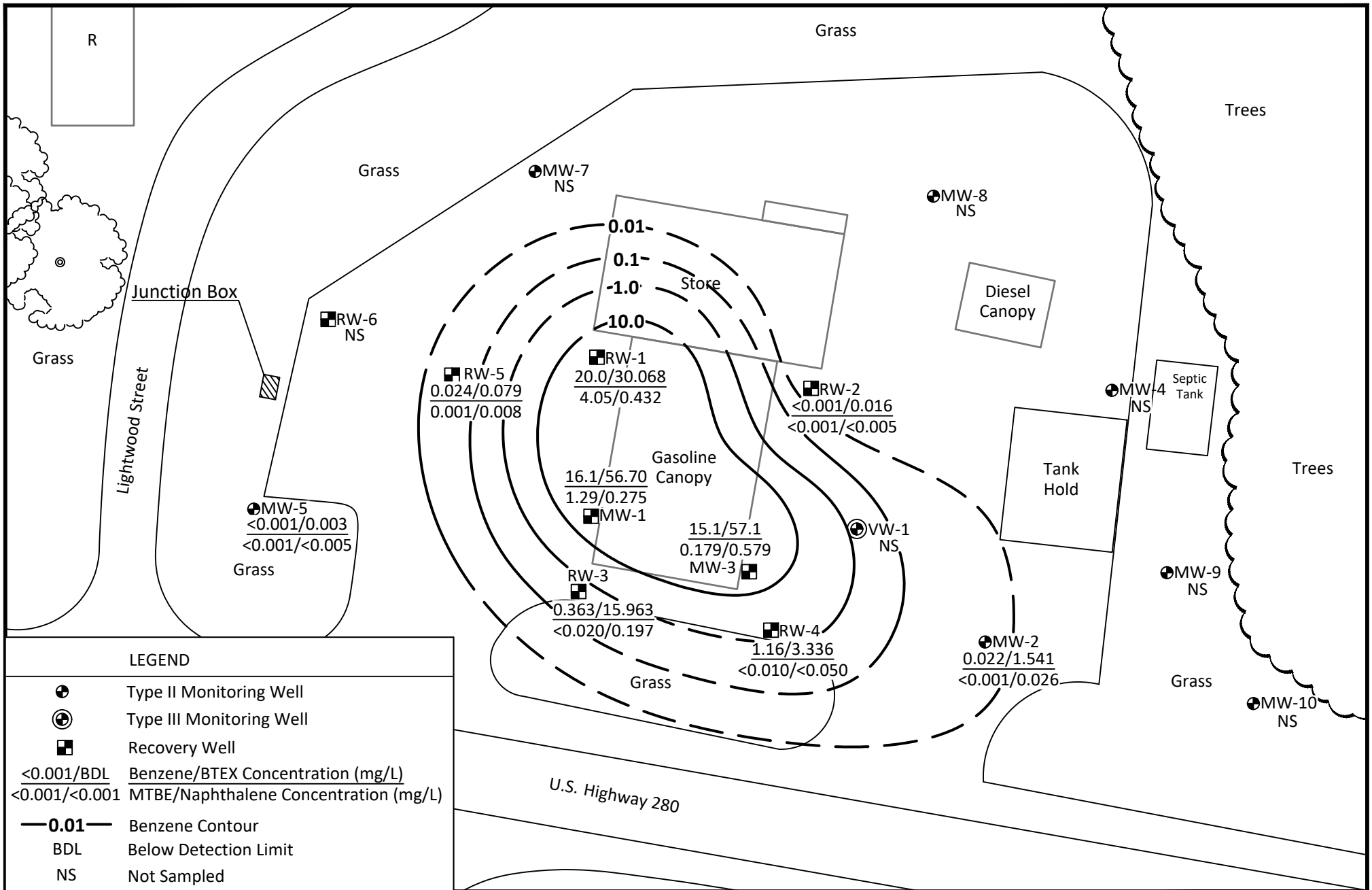
-  Type II Monitoring Well
-  Type III Monitoring Well
-  Recovery Well
- 739.46 Potentiometric Elevation
-  740 Potentiometric Contour
-  Groundwater Flow Direction
- NM Not Measured



Potentiometric Surface Map
 January 15, 2026

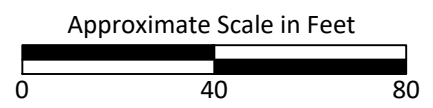
Shop N Fill #15 Texaco
 1652 U.S. Highway 280
 Kellyton, Coosa County, Alabama





Groundwater Analytical and Benzene Contour Map
January 15, 2026

Shop N Fill #15 Texaco
1652 U.S. Highway 280
Kellyton, Coosa County, Alabama



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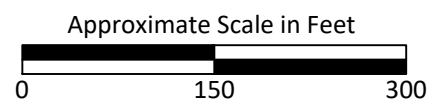
- C Commercial
- R Residential



Land Use Map



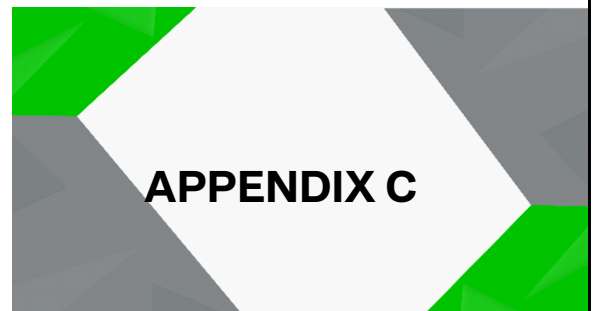
Shop N Fill #15 Texaco
1652 U.S. Highway 280
Kellyton, Coosa County, Alabama





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DEEPEARTH PROPOSAL



APPENDIX C



(708) 396-0100 - tech@cool-ox.com

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

Three Notch Group, Inc.
1962 West Main Street
Dothan, AL 36301

Site: Shop N Fill #15 Texaco
1652 US Hwy 280
Kellyton, AL

7/21/2025

DTI Job #: Q2957

Attention: Alec Black

Phone: 334-797-9869

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

Contaminants: BTEX/Naph	Depth to Groundwater (feet bgl):	11
Media Treated: Soil & GW	Vertical Extent (feet bgl):	10 to 25
Area (square feet): 8,000	Proposed Injection Point Spacing (feet):	6
Cubic Yards: 4,444	Reagent Per Cubic Yard (gal):	6
Number of Points: 222	Est. On-Site Days to Complete:	15
Estimated Total Gals: 26,667	Equivalent \$: \$/ton: \$	43.63
Gals Per Point: 120		
Lump Sum Price: \$		289,407

Conditions of Quote:

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

4) Site Specific Provisions:

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

5) Ownership of Documents, Patents, and Copyrights:

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

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

Sincerely,
William L. Lundy, Sr. V. P.
DeepEarth Technologies, Inc.

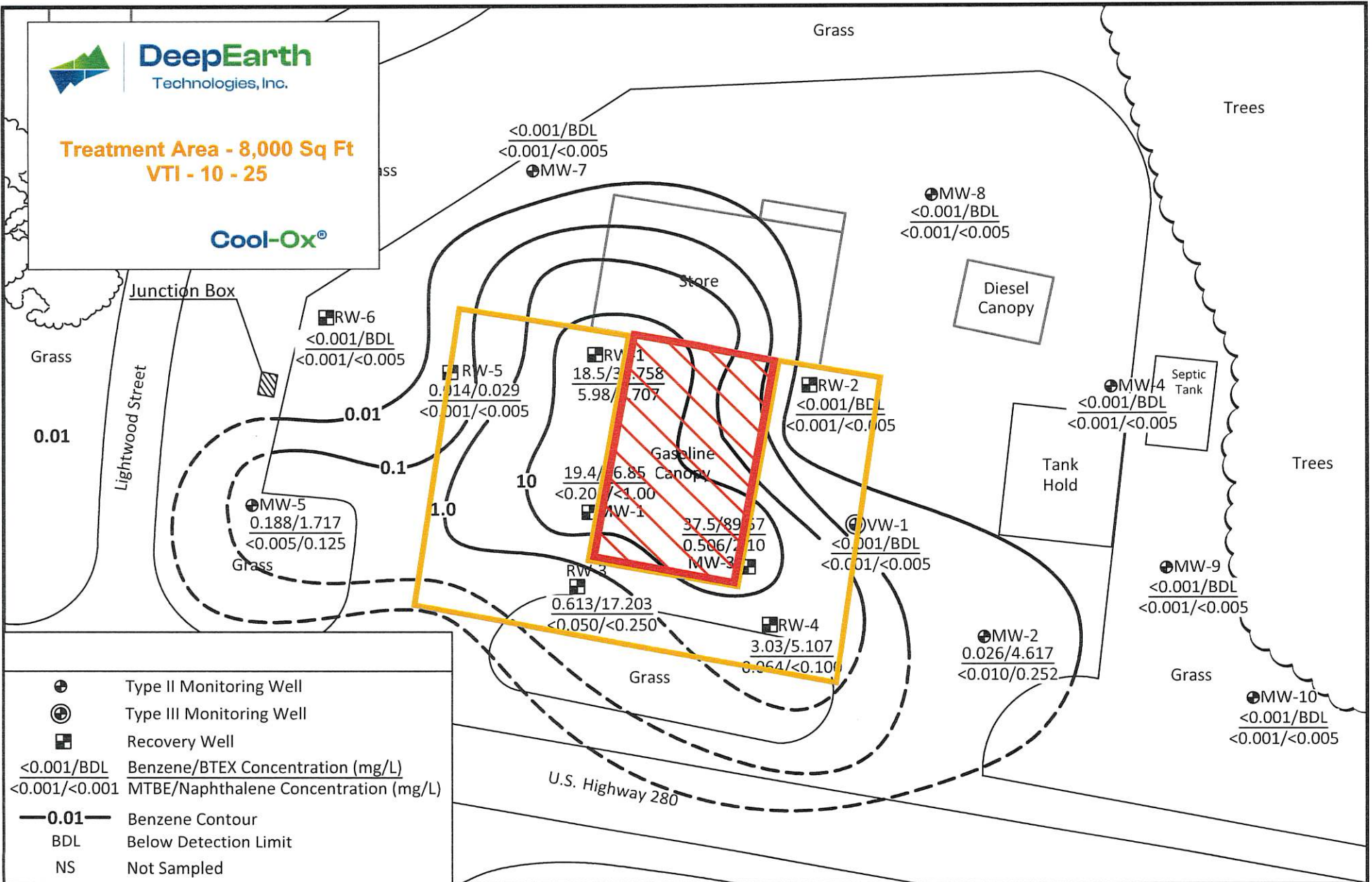
Accepted:
Name and Title: _____
Order Number: _____ Date: _____



DeepEarth
Technologies, Inc.

Treatment Area - 8,000 Sq Ft
VTI - 10 - 25

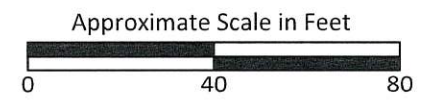
Cool-Ox®



- ⊕ Type II Monitoring Well
- ⊙ Type III Monitoring Well
- ⊞ Recovery Well
- $\frac{<0.001/BDL}{<0.001/<0.001}$ Benzene/BTEX Concentration (mg/L)
- $\frac{<0.001/<0.001}{<0.001/<0.001}$ MTBE/Naphthalene Concentration (mg/L)
- 0.01— Benzene Contour
- BDL Below Detection Limit
- NS Not Sampled

Groundwater Analytical and Benzene Contour Map
November 14, 2024

Shop N Fill #15 Texaco
1652 U.S. Highway 280
Kellyton, Coosa County, Alabama



APPROVED ARBCA SSTLs

ARBCA SUMMARY REPORT

FORM NO. 29a

UST Incident No(s): UST19-07-08

Facility ID: 10642-037-17769

Date Form Completed: 22-Feb-21

Form Completed By: David C. Dailey

TIER 2-ON-SITE TARGET LEVELS FOR INHALATION AND INGESTION

NOTE: The SSTLs listed for each route of exposure are the minimum SSTLs for all the receptors for that particular route of exposure. The Tier 2 on-site target levels are the minimum SSTLs of all routes of exposures within each medium.

CHEMICALS OF CONCERN	SURFICIAL SOIL		SUBSURFACE SOIL			GROUNDWATER			
	Outdoor Inhalation, Ingestion, & Dermal Contact [mg/kg]	On-Site Tier 2 Target Levels [mg/kg]	Indoor Inhalation [mg/kg]	Outdoor Inhalation [mg/kg]	On-Site Tier 2 Target Levels [mg/kg]	Indoor Inhalation [mg/L]	Outdoor Inhalation [mg/L]	Ingestion of Water [mg/L]	On-Site Tier 2 Target Levels [mg/L]
ORGANICS									
Benzene	39.6	39.6	46.8	496	46.8	168	1750	NA	168
Toluene	174	174	174	174	174	526	526	NA	526
Ethylbenzene	62.8	62.8	62.8	62.8	62.8	169	169	NA	169
Xylenes (Total)	69.5	69.5	69.5	69.5	69.5	175	175	NA	175
MtBE	378	378	11900	11900	11900	48000	48000	NA	48000
Anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	29.6	29.6	29.6	29.6	29.6	31	31	NA	31
Phenanthrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
METALS									
Arsenic	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium VI	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA

NOTE:

NA: Not Available

ARBCA SUMMARY REPORT

FORM NO. 29b

UST Incident No(s): UST19-07-08

Facility ID: 10642-037-17769

Date Form Completed: 22-Feb-21

Form Completed By: David C. Dailey

TIER 2 OFF-SITE TARGET LEVELS FOR INHALATION AND INGESTION

NOTE: The SSTLs listed for each route of exposure are the minimum SSTLs for all the receptors for that particular route of exposure. The Tier 2 off-site target levels are the minimum SSTLs of all routes of exposures within each medium.

CHEMICALS OF CONCERN	SURFICIAL SOIL		SUBSURFACE SOIL			GROUNDWATER			
	Outdoor Inhalation, Ingestion, & Dermal Contact [mg/kg]	Off-Site Tier 2 Target Levels [mg/kg]	Indoor Inhalation [mg/kg]	Outdoor Inhalation [mg/kg]	Off-Site Tier 2 Target Levels [mg/kg]	Indoor Inhalation [mg/L]	Outdoor Inhalation [mg/L]	Ingestion of Water [mg/L]	Off-Site Tier 2 Target Levels [mg/L]
ORGANICS									
Benzene	22.8	22.8	7.13	496	7.13	25.7	1750	NA	25.7
Toluene	174	174	174	174	174	526	526	NA	526
Ethylbenzene	62.8	62.8	62.8	62.8	62.8	169	169	NA	169
Xylenes (Total)	69.5	69.5	69.5	69.5	69.5	175	175	NA	175
MtBE	94.8	94.8	6830	11900	6830	27800	48000	NA	27800
Anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(b)fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	29.6	29.6	29.6	29.6	29.6	31	31	NA	31
Phenanthrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
METALS									
Arsenic	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium VI	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA

NOTE:

NA: Not Available

UST Incident No(s): UST19-07-08 Facility ID: 10642-037-17769

Date Form Completed: 22-Feb-21 Form Completed By: David C. Dailey

TIER 2 GROUNDWATER RESOURCE PROTECTION TARGET CONCENTRATIONS

Distance from source to the point of exposure (POE): 620 feet															
CHEMICALS OF CONCERN	COMPARISON FOR SOURCE SOIL			COMPARISON FOR SOURCE GROUNDWATER			COMPARISON FOR COMPLIANCE WELLS								
	Soil Source Rep. Conc. ¹ [mg/kg]	Allowable Soil Conc. ² [mg/kg]	E/ NE	GW Source Rep. Conc. ³ [mg/L]	Allowable GW Conc. at a POC ⁴ [mg/L]	E/ NE	CW Rep. Conc. ⁵ [mg/L]	Allowable GW Conc. at a POC ⁶ [mg/L]	E/ NE	CW Rep. Conc. ⁵ [mg/L]	Allowable GW Conc. at a POC ⁶ [mg/L]	E/ NE	CW Rep. Conc. ⁵ [mg/L]	Allowable GW Conc. at a POC ⁶ [mg/L]	E/ NE
COMPLIANCE WELL NO.	MW-3 (10-15')			MW-3			MW-1			MW-2			MW-4		
DISTANCE FROM SOURCE	0 feet			0 feet			0 feet			78 feet			15 feet		
RECENT TREND	sampled once			fluctuating			fluctuating			fluctuating			static		
ORGANICS															
Benzene	0.004	0.42	NE	19.4	0.435	E	17.567	0.435	E	1.843	0.216	E	0.0005	0.435	NE
Toluene	0.0205	98.2	NE	23.433	87	NE	29	87	NE	2.25	43.2	NE	0.0013	87	NE
Ethylbenzene	0.601	62.8	NE	3.64	60.9	NE	3.68	60.9	NE	2.297	30.2	NE	0.0005	60.9	NE
Xylenes (Total)	5.22	69.5	NE	16.533	175	NE	15.593	175	NE	8.507	175	NE	0.0133	175	NE
MTBE	0.207	1.47	NE	1.457	1.74	NE	1.067	1.74	NE	0.0035	0.864	NE	0.0005	1.74	NE
Anthracene															
Benzo(a)anthracene															
Benzo(a)pyrene															
Benzo(b)fluoranthene															
Benzo(g,h,i)perylene															
Benzo(k)fluoranthene															
Chrysene															
Fluoranthene															
Fluorene															
Naphthalene	6.58	5.66	E	0.757	1.74	NE	0.681	1.74	NE	0.644	0.864	NE	0.0025	1.74	NE
Phenanthrene															
Pyrene															
METALS															
Arsenic															
Barium															
Cadmium															
Chromium VI															
Lead															
Zinc															

NOTE: Use the ARBCA Computational Software to calculate the allowable (i) soil source conc., (ii) GW source conc., and (iii) compliance well conc.

1: The soil source representative concentrations have to be calculated and entered here.

2: Allowable soil concentrations at the source protective of groundwater at the POE.

3: The groundwater source representative concentrations have to be calculated and entered here.

4: Allowable groundwater concentrations at the source protective of groundwater at the POE.

5: Representative concentrations in the compliance well.

6: Allowable groundwater concentrations at a point of compliance (POC) protective of a POE.

E: Representative concentration exceeds allowable concentration.

NE: Representative concentration does not exceed allowable concentration.

Recommended Attachment: A map showing the location(s) of the soil source(s), location of POE, and location(s) of POC.

ARBCA SUMMARY REPORT

FORM NO. 27

UST Incident No(s): UST19-07-08	Facility ID: 10642-037-17769
Date Form Completed: 22-Feb-21	Form Completed By: David C. Dailey

TIER 2 GROUNDWATER RESOURCE PROTECTION TARGET CONCENTRATIONS

Distance from source to the point of exposure (POE):		620 feet													
COMPARISON FOR COMPLIANCE WELLS															
CHEMICALS OF CONCERN	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC ⁶	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE
	[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]	
COMPLIANCE WELL NO.	MW-5			MW-6			MW-7			MW-8			MW-9		
DISTANCE FROM SOURCE	105 feet			95 feet			70 feet			84 feet			128 feet		
RECENT TREND	fluctuating			fluctuating			fluctuating			fluctuating			fluctuating		
ORGANICS															
Benzene	0.027	0.14	NE	0.8855	0.164	E	0.02075	0.247	NE	0.02775	0.196	NE	0.03575	0.101	NE
Toluene	0.0025	28.1	NE	0.0025	32.7	NE	0.00075	49.4	NE	0.10675	39.1	NE	0.08675	20.3	NE
Ethylbenzene	0.03125	19.7	NE	0.00175	22.9	NE	0.0005	34.6	NE	0.00325	27.4	NE	0.00275	14.2	NE
Xylenes (Total)	0.0955	175	NE	0.11875	175	NE	0.00175	175	NE	0.49075	175	NE	0.61575	175	NE
MTBE	0.0005	0.561	NE	0.3505	0.655	NE	0.0115	0.988	NE	0.00175	0.782	NE	0.00275	0.405	NE
Anthracene															
Benzo(a)anthracene															
Benzo(a)pyrene															
Benzo(b)fluoranthene															
Benzo(g,h,i)perylene															
Benzo(k)fluoranthene															
Chrysene															
Fluoranthene															
Fluorene															
Naphthalene	0.01675	0.561	NE	0.05925	0.655	NE	0.0025	0.988	NE	0.01425	0.782	NE	0.02625	0.405	NE
Phenanthrene															
Pyrene															
METALS															
Arsenic															
Barium															
Cadmium															
Chromium VI															
Lead															
Zinc															

NOTE: Use the *ARBCA Computational Software* to calculate the allowable (i) soil source conc., (ii) GW source conc., and (iii) compliance well conc.
 5: Representative concentrations in the compliance well.
 6: Allowable groundwater concentrations at a point of compliance (POC) protective of a POE.
 E: Representative concentration exceeds allowable concentration.
 NE: Representative concentration does not exceed allowable concentration.

Recommended Attachment: A map showing the location(s) of the soil source(s), location of POE, and location(s) of POC.

ARBCA SUMMARY REPORT

FORM NO. 27

UST Incident No(s): UST19-07-08 **Facility ID:** 10642-037-17769

Date Form Completed: 22-Feb-21 **Form Completed By:** David C. Dailey

TIER 2 GROUNDWATER RESOURCE PROTECTION TARGET CONCENTRATIONS

Distance from source to the point of exposure (POE): *620 feet*

CHEMICALS OF CONCERN	COMPARISON FOR COMPLIANCE WELLS														
	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC ⁶	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE	CW Rep. Conc. 5	Allowable GW Conc. at a POC 6	E/ NE
	[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]	
COMPLIANCE WELL NO.	<i>MW-10</i>			<i>VW-1</i>			<i>RW-1</i>			<i>RW-2</i>			<i>RW-3</i>		
DISTANCE FROM SOURCE	<i>160 feet</i>			<i>32 feet</i>			<i>12 feet</i>			<i>15 feet</i>			<i>10 feet</i>		
RECENT TREND	<i>static</i>			<i>fluctuating</i>			<i>fluctuating</i>			<i>static</i>			<i>fluctuating</i>		

ORGANICS															
Benzene	0.0005	0.0684	NE	0.0195	0.417	NE	5.248	0.435	E	0.00075	0.435	NE	0.629	0.435	E
Toluene	0.00075	13.7	NE	0.003	83.4	NE	0.181	87	NE	0.00075	87	NE	1.6005	87	NE
Ethylbenzene	0.0005	9.58	NE	0.0005	58.4	NE	1.815	60.9	NE	0.0005	60.9	NE	0.5195	60.9	NE
Xylenes (Total)	0.001	137	NE	0.04	175	NE	3.9185	175	NE	0.01375	175	NE	3.2175	175	NE
MTBE	0.0005	0.274	NE	0.00125	1.67	NE	2.4765	1.74	E	0.0005	1.74	NE	0.00125	1.74	NE
Anthracene															
Benzo(a)anthracene															
Benzo(a)pyrene															
Benzo(b)fluoranthene															
Benzo(g,h,i)perylene															
Benzo(k)fluoranthene															
Chrysene															
Fluoranthene															
Fluorene															
Naphthalene	0.0025	0.274	NE	0.00925	1.67	NE	0.37525	1.74	NE	0.0025	1.74	NE	0.12325	1.74	NE
Phenanthrene															
Pyrene															
METALS															
Arsenic															
Barium															
Cadmium															
Chromium VI															
Lead															
Zinc															

NOTE: Use the *ARBCA Computational Software* to calculate the allowable (i) soil source conc., (ii) GW source conc., and (iii) compliance well conc.

5: Representative concentrations in the compliance well.

6: Allowable groundwater concentrations at a point of compliance (POC) protective of a POE.

E: Representative concentration exceeds allowable concentration.

NE: Representative concentration does not exceed allowable concentration.

Recommended Attachment: A map showing the location(s) of the soil source(s), location of POE, and location(s) of POC.

ARBCA SUMMARY REPORT

FORM NO. 27

UST Incident No(s): UST19-07-08 **Facility ID:** 10642-037-17769

Date Form Completed: 22-Feb-21 **Form Completed By:** David C. Dailey

TIER 2 GROUNDWATER RESOURCE PROTECTION TARGET CONCENTRATIONS

Distance from source to the point of exposure (POE): **620 feet**

COMPARISON FOR COMPLIANCE WELLS

CHEMICALS OF CONCERN	CW Rep. Conc.	Allowable GW Conc. at a POC	E/ NE	CW Rep. Conc.	Allowable GW Conc. at a POC ⁶	E/ NE	CW Rep. Conc.	Allowable GW Conc. at a POC	E/ NE	CW Rep. Conc.	Allowable GW Conc. at a POC	E/ NE	CW Rep. Conc.	Allowable GW Conc. at a POC	E/ NE
	5	6		5	6		5	6		5	6		5	6	
	[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]		[mg/L]	[mg/L]	
COMPLIANCE WELL NO.	<i>RW-4</i>														
DISTANCE FROM SOURCE	<i>15 feet</i>														
RECENT TREND	<i>fluctuating</i>														

ORGANICS

Benzene	7.55	0.435	E												
Toluene	4.295	87	NE												
Ethylbenzene	1.625	60.9	NE												
Xylenes (Total)	11.48	175	NE												
MTBE	1.29	1.74	NE												
Anthracene															
Benzo(a)anthracene															
Benzo(a)pyrene															
Benzo(b)fluoranthene															
Benzo(g,h,i)perylene															
Benzo(k)fluoranthene															
Chrysene															
Fluoranthene															
Fluorene															
Naphthalene	0.465	1.74	NE												
Phenanthrene															
Pyrene															

METALS

Arsenic															
Barium															
Cadmium															
Chromium VI															
Lead															
Zinc															

NOTE: Use the *ARBCA Computational Software* to calculate the allowable (i) soil source conc., (ii) GW source conc., and (iii) compliance well conc.
 5: Representative concentrations in the compliance well. 6: Allowable groundwater concentrations at a point of compliance (POC) protective of a POE.
 E: Representative concentration exceeds allowable concentration. NE: Representative concentration does not exceed allowable concentration.

Recommended Attachment: A map showing the location(s) of the soil source(s), location of POE, and location(s) of POC.

QUALITY ASSURANCE/QUALITY CONTROL MONITORING AND SAMPLING PLAN

QA/QC MONITORING/SAMPLING PLAN

FIELD ACTIVITIES

Air Sampling

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

Air Screening

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

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

Air Sampling Protocols

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

documentation. The samples are sent direct to the laboratory via overnight carrier, or are picked up from the CDG office by a representative of the laboratory.

Groundwater Monitoring/Sampling Activity Protocols

Groundwater monitoring/sampling includes the following associated activities:

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

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

Free Product Detection and Measurement

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

The free product thickness is determined by calculating the difference between the measurement to the top of free product and the measurement to the free product/water interface (the interface probe measures free product and water levels to an accuracy of 0.01 feet). If free product is identified by the interface probe, a clear bailer is lowered into the well to collect a sample for visual confirmation of the free product. Remarks regarding visual characteristics of the free product are recorded (black, clear, colored, etc.).

Calculation of Standing Water Volume

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

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

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

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

Well Evacuation

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

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

Well evacuation with a diaphragm pump is conducted by lowering disposable tubing (hose) into the well, to sufficient depth. For deeper wells, a PVC pipe, equipped with a foot valve (to stage-lift the water out of the well) will be employed. The piping will be well-dedicated to prevent cross-contamination. Pumping will be performed until at least three well volumes are recovered (purge volume will be recorded).

Petroleum contaminated water (PCW) purged from wells in conjunction with groundwater monitoring/sampling activities will be containerized on-site in labeled 55-gallon drums. PCW will be removed periodically from the site to an appropriate disposal/treatment/recycling facility approved by the ADEM. Records will be maintained as to the volume of PCW accumulated at the site, and

identification labels will be affixed to PCW containers. Prior to disposal, samples will be collected and analyzed as required by the ADEM and the disposal/treatment/recycling facility. No waste will be removed from the site without ADEM knowledge/approval.

Groundwater Sample Collection

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

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

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

Immediately following collection of each groundwater sample, the sample is labeled, placed in bubble pack (to prevent the glass vial from breaking during shipping), and stored in a well-iced ice chest. Each sample label includes the site

location, sample identification number, name of collector, date/time of collection, and parameter(s) requested.

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

Decontamination of Groundwater Sampling Equipment

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

QA/QC PROCEDURES DISCUSSION

Chain of Custody

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

The samples remain in the custody of the CDG representative until delivered to the subcontract laboratory or dispatched via common carrier for shipment to the laboratory. In cases where samples leave the direct control of CDG personnel, such as shipment to a laboratory by a common carrier (FedEx, UPS, etc.), a seal will be provided on the shipping container or individual sample bottles to ensure that the samples have not been opened or otherwise disturbed during transportation.

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

- Sample number

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

Field QA/QC Program

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

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

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

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

- A completeness review of field data contained on water and soil sampling logs;

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

Laboratory QA/QC Program

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

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

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

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

applicable to those blanks will be labeled suspect and may only be sufficient for qualitative purposes.

- A review of detection limits, to ensure sample results are accurate to below the levels specified as ADEM Initial Screening Levels.
- A review of data “qualifiers” reported by the laboratory for significance to the results.

SITE HEALTH AND SAFETY PLAN

Site Health and Safety Plan

Updated February 2026

**Shop N Fill #15 Texaco
4652 US Highway 280
Kellyton, Coosa County, Alabama
Facility ID# 10642-037-017769
UST# 19-07-08**

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1.0 Introduction

This Health and Safety Plan (HASP) has been prepared for the assessment and corrective action activities to be conducted by Three Notch Group, Inc. (Three Notch) for the Shop N Fill #15 Texaco facility located in Kellyton, Coosa County, Alabama. These activities include all fieldwork necessary to conduct soil and groundwater assessment/remediation of petroleum hydrocarbons at the site.

2.0 Purpose

This HASP describes the preventative measures, person protection, and safety procedures to be followed by Three Notch personnel and subcontractors during all field activities. The HASP has been prepared in accordance with and meets the requirements of the Occupation Safety and Health Administration (OSHA) General Safety Standards for industry under 29 CFR 1910 and construction under 29 CFR 1926. Should any unexpected conditions arise, the HASP will be amended to accommodate site specific conditions.

3.0 Key Personnel and Responsibilities

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

NAME	TITLE	RESPONSIBILITIES
Chad Elliot	Project Manager	Overall management of entire project from beginning to completion. Responsible for preparation and implementation of the HASP and reporting of all hazard incidents to appropriate enforcement agencies. Coordinates and oversees all field activities.
Clint Foxx	Senior Field Technician/ Site HSO	Performs all field activities and is responsible for recognizing site hazards and reporting hazard incidents to Corporate HSO.

4.0 Scope of Work

Work to be performed may include site assessment as well as remedial action implementation activities. Specific tasks to be performed are described in the sections below.

4.1 Site Assessment/Remedial Action Activities

Site assessment and remedial action activities generally involve collecting soil and groundwater samples for analysis to characterize the site and to define the extent of subsurface contamination.

More specifically this will include:

- Preparing the site for work to be performed
- Performing a utility locate to identify any underground utility services that need to be protected during subsurface investigation activities
- Removing pavement/concrete surfacing material to access subsurface in specific areas on the property as determined in the work plan
- Advancing soil borings by hand auger, drill rig, or direct push technology to obtain soil/groundwater samples for field screening/laboratory analysis and injection of chemicals
- Installing temporary or permanent groundwater monitoring wells
- Excavating petroleum impacted soil and transporting to landfill for disposal

5.0 Chemical Hazards

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

5.1 Gasoline

Gasoline is a substance to be potentially encountered in the soil and groundwater at the site. Gasoline components include benzene, toluene, ethylbenzene, and xylenes (BTEX).

5.2 Hazard Identification

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

Occasionally methyl tertiary-butyl ether (MTBE) is encountered. MTBE has been used since 1979 as

an oxygenate to gasoline in order to decrease carbon monoxide production in cars, particularly older model cars; however, MTBE has been determined to be a potential carcinogen. MTBE has low taste and odor thresholds, which can make a water supply non-potable even at low concentrations.

Exposure to MTBE will only be seen through exposure to gasoline containing MTBE and the effects of gasoline containing MTBE are relatively similar to gasoline not containing MTBE.

The following are hazards associated with exposure to gasoline:

- Contact may irritate or burn the skin and eyes and absorption through the skin may be poisonous
- Vapors may be poisonous if inhaled and are irritating to the respiratory tract
- Vapors are an explosion hazard and may travel to a source of ignition and produce flashback
- A gasoline fire may produce irritating and poisonous gases
- Gasoline and diesel are flammable/combustible materials that may be ignited by heat, sparks, or flames, and a gasoline container may explode when exposed to heat or fire

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

5.3 Hazard Prevention

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

5.4 Symptoms and First Aid Procedures

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

ROUTES OF EXPOSURE	SYMPTOMS	TREATMENT
Inhalation	Dizziness, nausea, lack of coordination, headache, irregular and rapid breathing, weakness, loss of consciousness, coma	Bring victim to fresh air. Rinse eyes or throat with plenty of water, if irritated. If symptoms are severe (victim vomits, is very dizzy or groggy, etc.), evacuate to hospital. Be prepared to administer CPR if certified. Monitor victim for at least 48

		hours.
Dermal	Irritation, rash, or burning	Flush affected area with water for at least 15 minutes. Apply clean dressing and get medical attention.
Ingestion	Dizziness, nausea with stomach cramps, loss of consciousness, coma	Evacuate victim to hospital. Do not induce vomiting.
Eye	Redness, irritation, pain, impaired vision	Flush with an abundant amount of water for at least 15 minutes. If severe, seek medical attention immediately.

6.0 Equipment/Operational Hazards

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

6.1 Hazard Identification

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

- Gasoline vapors from nearby dispensers can potentially enter the diesel-operated engine thereby causing fire/explosion hazards
- Rotating augers may catch onto gloves or clothing thereby pulling hands and arms into the rotating machinery
- Drilling equipment may rupture hydraulic hoses thereby releasing hydraulic fluids
- Engine and exhaust system of an engine are extremely hot during and following operation
- Potential contact with overhead and underground utilities

- Open excavations/boreholes can be the source of trips and falls
- Digging machinery such as backhoes may puncture subsurface utilities
- Operators of heavy machinery may be unable to locate pedestrians near the operating equipment; therefore, all field personnel are to remain within eye contact of the operator at all times during operation

6.2 Hazard Prevention

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

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

6.3 Symptoms and First Aid Procedure

Hazards associated with heavy equipment were identified in Section 6.1. Unlike hazards associated with temperature or chemicals, symptoms will not be apparent with these types of hazards. In addition, these hazards will occur rapidly as opposed to over a period of time. Due to the size and composition of hydraulic vehicles, exposure to these hazards will range from extremely serious to life-threatening; therefore, CDG requires that exposed field personnel seek medical attention at the nearest medical facility and the Project Manager be notified immediately. A site location map to the nearest hospital is presented in this plan.

7.0 Temperature Hazards

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

7.1 Heat

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

7.1.1 Hazard Identification

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

7.1.1.1 Heat Fatigue

Heat fatigue occurs due to a lack of acclimatization (adjusting one's tolerance to work in elevated temperatures). Acclimatization is a gradual process. This process should include all field personnel being permitted to work in elevated temperatures in specified increments. On a daily basis, the maximum allowable work period should gradually be increased until the worker is able to perform his/her duties more proficiently under these conditions. The use of an acclimatization program is recommended in the regulatory guidelines established by OSHA.

7.1.1.2 Heat Rash

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

7.1.1.3 Heat Collapse

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

7.1.1.4 Heat Cramps

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

7.1.1.5 Heat Exhaustion

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

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

7.1.1.6 Heat Stroke

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

7.1.2 Hazard Prevention

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

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

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

7.1.3 Symptoms and First Aid Procedures

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

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

8.0 Explosion/Electrocution Hazards

As stated previously in Section 4.1, extensive efforts are made in order to determine the location of subsurface utilities prior to corrective action activities. Efforts are made to obtain the location of underground utilities through the Line Locator Services, and utility companies are notified in advance to perform a site inspection and utility marking; however, the potential for a subsurface utility to go unnoticed exists. Therefore, the hazards associated with exposure to these utilities are identified and preventative measures and first aid procedures are discussed further in the following sections.

8.1 Explosion

Primarily when dealing with subsurface utilities, two potentially life-threatening hazards exist. The

first hazard identified in association with subsurface utilities during excavation activities are discussed further in the following section.

8.1.1 Hazard Identification

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

8.1.2 Hazard Prevention

Preventative measures are ensured prior to field activities. These measures generally encompass locating subsurface utilities. In addition, Three Notch will request local utility companies to perform site inspections and mark all subsurface utilities. In addition to this notification, if a subsurface utility is not identified and Three Notch suspects the utility to exist, Three Notch will take additional precautionary measures to ensure the suspected utility does not exist. These measures generally include locating utility meter boxes, etc. In addition, a field technician or subcontractor will generally hand auger or utilize posthole diggers to identify the existence of subsurface utilities prior to drilling.

8.2 Electrocution

8.2.1 Hazard Identification

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

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

current.

8.2.2 Hazard Prevention

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

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

8.2.3 Symptoms and First Aid Procedures

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

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

9.0 Miscellaneous Hazards

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

9.1 Hazard Identification

Occasionally, exposure to common nuisances may potentially result in a life-threatening situation. For example, a wasp or bee sting for some individuals only causes irritation or localized soreness; however, to others with little tolerance for wasp or bee venom, an allergic reaction can result which

could potentially lead to death if not treated immediately. Therefore, allergic reactions to these insects have been identified as a potential hazard. In addition to the insects, contact with black widow spiders (red hourglass), brown recluse spiders (violin shape on back), and snakes are also potential hazards.

9.2 Hazard Prevention

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

9.3 Symptoms and First Aid Procedures

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

10.0 Additional Precautions

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

10.1 Personal Protective Equipment

PPE is the most effective measure to prevent exposure to chemical hazards. There are four levels of PPE protection ranging from Level A to Level D equipment.

Level A protection serves as the most conservative protective equipment, and Level D protection

serves as the least conservative protective equipment. These levels are described further in the following table:

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

Level D protective clothing, as indicated below, shall be considered the minimum requirements for site assessment activities:

- Hard hat
- Coveralls*
- Non-permeable gloves
- Steel-toe, non-permeable boots
- Hearing protection*
- Safety glasses (impact)
- Safety goggles (chemical)*

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

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

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

10.2 Signs, Signals, and Barricades

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

- Utilize barricades to protect workers, pedestrians and vehicles from work activities
- Prevent the use of open flames or spark producing activities within the work exclusion zone when field screening indicates the presence of an explosive atmosphere
- Utilize cones to protect workers from incoming and ongoing vehicles

10.3 Fire Protection and Prevention

As stated previously in Section 5.1, gasoline is a highly flammable substance. Three Notch prohibits smoking and other ignition sources within the work area exclusion zone in an attempt to prevent fires from occurring; however, as a secondary precaution Three Notch plans to implement the following:

- Maintain a 20 lb. ABC Dry Chemical fire extinguisher on site at all times
- Eliminate ALL ignition sources in the vicinity of any releases

10.4 Storage and Decontamination

During the site assessment/corrective action activities, impacted soils will be encountered. Groundwater generated from assessment activities will be managed in accordance with state and federal regulatory requirements. Contaminated soil will be temporarily stored until transported for disposal. Decontamination procedures will be implemented should chemical exposure occur. The procedures are detailed below:

- Avoid contact with liquid gasoline or diesel
- Place contaminated soil generated from drilling activities in a storage container and cover once removed from the boring
- Change any product contaminated clothing immediately
- Wash any contaminated skin surfaces immediately with soap and water

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

encountered during field activities.

11.0 Emergency Contingency Plan

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

11.1 Notification/Reporting Procedures

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

11.2 Hazardous Substance Release

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

11.3 Personnel Injury

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

11.4 Evacuation Plan

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

implemented:

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

11.5 Spill Prevention and Response

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

11.6 Emergency Communication

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

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

11.7 Contingency Contacts

In the event of an emergency, Three Notch has provided several emergency contacts.

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

AGENCY	CONTACT	TELEPHONE NO.
Fire Department		911
Police Department		911
Ambulance		911
Hospital		1-256-233-9292
Corporate HSO	Heath Holmes	1-334-222-9431
Project Manager	Chad Elliot	1-205-403-2600
EPA RCRA-Superfund Hotline		1-800-424-9346
Chemtrec (24 hours)		1-800-424-9300
Bureau of Explosives (24 hours)		1-850-413-3610

Centers for Disease Control (Biological Agents)		1-800-232-4636
National Response Center		1-800-424-8802

MEDICAL FACILITY

Name of Hospital: Southeast Health Medical Center

Address: 1806 Fairview Avenue
Dothan, Alabama 36301

Phone: 334-712-3331

Route to Hospital: Head toward US-231 S (157 feet). Turn left onto US-231 N (2.1 miles). Turn right onto US-431 N (2.4 miles). Use left two lanes to turn slight left onto Haven Dr. (0.9 miles). Turn right (59 feet). Turn left (141 feet). Turn right.. Destination is on right (66 feet).

Travel Time from Site: 13 minutes

Distance to Hospital: 5.5 miles

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



**THREE
NOTCH
GROUP**

ADEM FORMS



APPENDIX G

UST RELEASE FACT SHEET

GENERAL INFORMATION:

SITE NAME: Shop N Fill #15 Texaco
 ADDRESS: 1652 US Highway 280
Kellyton, Coosa County, Alabama
 FACILITY I.D. NO.: 10642-037-017769
 UST INCIDENT NO.: UST 19-07-08

RESULTS OF EXPOSURE ASSESSMENT:

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

CONTAMINATION DESCRIPTION:

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

Free product present in wells? Yes No

Maximum BTEX concentrations measured in soil: MW-3; BTEX = 5.82 mg/kg on 9/12/19
 Maximum BTEX or PAH concentrations measured in groundwater: MW-3; BTEX = 828.1 mg/L on 10/15/25

ADEM GROUNDWATER BRANCH
UST SITE CLASSIFICATION SYSTEM
CHECKLIST

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

SITE NAME: Shop N Fill #15 Texaco
 SITE ADDRESS: 1652 US Highway 280
Kellyton, Coosa County, Alabama
 FACILITY I.D. NO.: 10642-037-017769
 UST INCIDENT NO.: UST 19-07-08
 OWNER NAME: Bowden Oil Company
 OWNER ADDRESS: PO Box 145
Sylacauga, AL 35150
 NAME & ADDRESS OF PERSON COMPLETING THIS FORM: Chad Elliott
Three Notch Group, Inc.
700 Southgate Drive, Suite A
Pelham, AL 35124

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

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

ADDITIONAL COMMENTS:

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

Enter the determined classification ranking:	G.1
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TASKS PERFORMANCE SUMMARY

TASK PERFORMANCE SUMMARY

CAP Development (April 2026)

(CP-30)

Shop N Fill #15 Texaco

1652 US Highway 280

Kellyton, Coosa County, Alabama

Task Completed by Personnel/Title:	Project Management	Work Plan Preparation/ Review	CP Preparation/ Review	Field Work	Data Interpretation/ Tabulations	Drafting	Report Preparation/ Review	PR Preparation/ Review
Griffin Gatschet, PG/PM								
Alec Black, PG					X		X	
Alan Barck, PE							X	
Michelle Grantham, PM	X		X					X
Jessica Reed, PE/PM								
Chad Elliott, PM	X		X		X		X	X
Luke Fanter, Engineer			X					
Evan Morrison, Tech				GSC/WG				
John David Galloway, Tech								
James Arnold, Drafter						X		
Karen Moore, Drafter/Admin	X				X			
Lee Ann Wagner, Admin	X		X				X	X
Ashley Roberts, Admin	X		X					
Leigh Caylor	X							X
Patricia Horwath, Admin								

Notes:

DO=Drilling Oversight

BL=Boring Log Description/Soil Classification

WG=Well Gauging

GSC=Groundwater Sample Collection

MEME=MEME Oversight

PM=Project Management

O&M=Routine Operation & Maintenance

HRS=High Resolution Study

VM=Vapor Monitoring

FC=Fan Check