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**JUL 06 2026**

MR. JOSEPH R DENNIS  
SR. DIRECTOR, SAFETY HEALTH ENVIRONMENT AND QUALITY  
G2O TECHNOLOGIES, LLC  
16693 PLANT ROAD  
CHILDERSBURG, AL 35044

**RE: DRAFT PERMIT**  
**NPDES PERMIT NUMBER AL0077186**

Dear Mr. Dennis:

Transmitted herein is a draft of the referenced permit.

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

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

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

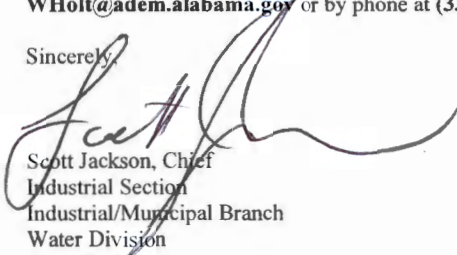
1. The user has logged in to E2 since October 1, 2019; and
2. The E2 user account is set up using a unique email address.

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

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

If you have questions regarding this permit or monitoring requirements, please contact Wayne Holt by e-mail at [WHolt@adem.alabama.gov](mailto:WHolt@adem.alabama.gov) or by phone at (334) 271-7847.

Sincerely,

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

Enclosure: Draft Permit

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



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

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

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



# NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

**PERMITTEE:** G2O TECHNOLOGIES, LLC

**FACILITY LOCATION:** G2O TECHNOLOGIES, LLC - COOSA PINES  
16693 PLANT ROAD  
CHILDERSBURG, ALABAMA 35044  
TALLADEGA COUNTY

**PERMIT NUMBER:** AL0077186

**RECEIVING WATERS:** 001 - UNNAMED TRIBUTARY TO COOSA RIVER  
002 - UNNAMED TRIBUTARY TO COOSA RIVER

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

**ISSUANCE DATE:**

**EFFECTIVE DATE:**

**EXPIRATION DATE:**

**DRAFT**

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Alabama Department of Environmental Management  
Water Division Chief

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**PART I: DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS****A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS****DSN001S: Stormwater from non-process areas associated with alum manufacturing 3/**

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

| Parameter                                                                      | Quantity or Loading |                           | Units | Quality or Concentration  |       |                           | Units | Sample Frequency <sup>2</sup> | Sample Type <sup>1</sup> | Seasonal   |
|--------------------------------------------------------------------------------|---------------------|---------------------------|-------|---------------------------|-------|---------------------------|-------|-------------------------------|--------------------------|------------|
| pH (00400)<br>Effluent Gross Value                                             | *****               | *****                     | ***** | (Report)<br>Minimum Daily | ***** | (Report)<br>Maximum Daily | S.U.  | Semi-Annually                 | Grab                     | All Months |
| Solids, Total Suspended<br>(00530)<br>Effluent Gross Value                     | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Oil & Grease (00556)<br>Effluent Gross Value                                   | *****               | *****                     | ***** | *****                     | ***** | 15<br>Maximum Daily       | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Nitrogen, Ammonia Total<br>(As N) (00610)<br>Effluent Gross Value              | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Nitrogen, Kjeldahl Total (As<br>N) (00625)<br>Effluent Gross Value             | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Phosphorus, Total (As P)<br>(00665)<br>Effluent Gross Value                    | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Aluminum, Total<br>Recoverable (01104)<br>Effluent Gross Value                 | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Flow, In Conduit or Thru<br>Treatment Plant (50050)<br>Effluent Gross Value 4/ | *****               | (Report)<br>Maximum Daily | MGD   | *****                     | ***** | *****                     | ***** | Semi-Annually                 | Estimate                 | All Months |

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

- 1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.
- 2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.
- 3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.
- 4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

DSN002S: Stormwater from non-process areas associated with alum manufacturing 3/

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

| Parameter                                                                      | Quantity or Loading |                           | Units | Quality or Concentration  |       |                           | Units | Sample Frequency <sup>2</sup> | Sample Type <sup>1</sup> | Seasonal   |
|--------------------------------------------------------------------------------|---------------------|---------------------------|-------|---------------------------|-------|---------------------------|-------|-------------------------------|--------------------------|------------|
| pH (00400)<br>Effluent Gross Value                                             | *****               | *****                     | ***** | (Report)<br>Minimum Daily | ***** | (Report)<br>Maximum Daily | S.U.  | Semi-Annually                 | Grab                     | All Months |
| Solids, Total Suspended<br>(00530)<br>Effluent Gross Value                     | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Oil & Grease (00556)<br>Effluent Gross Value                                   | *****               | *****                     | ***** | *****                     | ***** | 15<br>Maximum Daily       | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Nitrogen, Ammonia Total<br>(As N) (00610)<br>Effluent Gross Value              | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Phosphorus, Total (As P)<br>(00665)<br>Effluent Gross Value                    | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Aluminum, Total<br>Recoverable (01104)<br>Effluent Gross Value                 | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually                 | Grab                     | All Months |
| Flow, In Conduit or Thru<br>Treatment Plant (50050)<br>Effluent Gross Value 4/ | *****               | (Report)<br>Maximum Daily | MGD   | *****                     | ***** | *****                     | ***** | Semi-Annually                 | Estimate                 | All Months |

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

- 1/ Samples collected to comply with the monitoring requirements specified above shall be collected at the following location: At the nearest accessible location just prior to discharge and after final treatment. Unless otherwise specified, composite samples shall be time composite samples collected using automatic sampling equipment or a minimum of eight (8) equal volume grab samples collected over equal time intervals. All composite samples shall be collected for the total period of discharge not to exceed 24 hours.
- 2/ If only one sampling event occurs during a month, the sample result shall be reported on the discharge monitoring report as both the monthly average and daily maximum value for all parameters with a monthly average limitation.
- 3/ See Part IV.A for Best Management Practices (BMP) Plan Requirements.
- 4/ See Part IV.B for Stormwater Measurement and Sampling Requirements.

## **B. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS**

### **1. Representative Sampling**

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

### **2. Test Procedures**

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

- a. For parameters with an EPA established Minimum Level (ML), report the measured value if the analytical result is at or above the ML and report "0" for values below the ML. Test procedures for the analysis of pollutants shall conform to 40 CFR Part 136 and guidelines published pursuant to Section 304(h) of the FWPCA, 33 U.S.C. Section 1314(h). If more than one method for analysis of a substance is approved for use, a method having a minimum level lower than the permit limit shall be used. If the minimum level of all methods is higher than the permit limit, the method having the lowest minimum level shall be used and a report of less than the minimum level shall be reported as zero and will constitute compliance; however, should EPA approve a method with a lower minimum level during the term of this permit the permittee shall use the newly approved method.
- b. For pollutants parameters without an established ML, an interim ML may be utilized. The interim ML shall be calculated as 3.18 times the Method Detection Level (MDL) calculated pursuant to 40 CFR Part 136, Appendix B.

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

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

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

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

### **3. Recording of Results**

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

- a. The facility name and location, point source number, date, time and exact place of sampling;
- b. The name(s) of person(s) who obtained the samples or measurements;
- c. The dates and times the analyses were performed;
- d. The name(s) of the person(s) who performed the analyses;
- e. The analytical techniques or methods used, including source of method and method number; and
- f. The results of all required analyses.

### **4. Records Retention and Production**

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

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

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

#### 5. Monitoring Equipment and Instrumentation

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

### C. DISCHARGE REPORTING REQUIREMENTS

#### 1. Reporting of Monitoring Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (3) If a permittee is allowed to submit a hard copy DMR, the DMR must be legible and bear an original signature. Photo and electronic copies of the signature are not acceptable and shall not satisfy the reporting requirements of this permit.
  - (4) If the permittee, using approved analytical methods as specified in Provision I.B.2, monitors any discharge from a point source for a limited substance identified in Provision I.A. of this permit more frequently than required by this permit, the results of such monitoring shall be included in the calculation and reporting of values on the DMR and the increased frequency shall be indicated on the DMR.
  - (5) In the event no discharge from a point source identified in Provision I.A. of this permit and described more fully in the permittee's application occurs during a monitoring period, the permittee shall report "No Discharge" for such period on the appropriate DMR.
- d. All reports and forms required to be submitted by this permit, the AWPCA and the Department's Rules, shall be electronically signed (or, if allowed by the Department, traditionally signed) by a "responsible official" of the permittee as defined in ADEM Administrative Code Rule 335-6-6-.09 or a "duly authorized representative" of such official as defined in ADEM Administrative Code Rule 335-6-6-.09 and shall bear the following certification:

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

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

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

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

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

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

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

Certified and Registered Mail shall be addressed to:

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

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

## **2. Noncompliance Notification**

### **a. 24-Hour Noncompliance Reporting**

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

- (1) does not comply with any daily minimum or maximum discharge limitation for an effluent characteristic specified in Provision I. A. of this permit which is denoted by an "(X)";
- (2) threatens human health or welfare, fish or aquatic life, or water quality standards;
- (3) does not comply with an applicable toxic pollutant effluent standard or prohibition established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a);
- (4) contains a quantity of a hazardous substance which has been determined may be harmful to public health or welfare under Section 311(b)(4) of the FWPCA, 33 U.S.C. Section 1321(b)(4);
- (5) exceeds any discharge limitation for an effluent characteristic as a result of an unanticipated bypass or upset; and
- (6) is an unpermitted direct or indirect discharge of a pollutant to a water of the state (unpermitted discharges properly reported to the Department under any other requirement are not required to be reported under this provision).

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

- b. If for any reason, the permittee's discharge does not comply with any limitation of this permit, the permittee shall submit to the Director or Designee a written report as provided in Part I.C.2.c below, such report shall be submitted with the next Discharge Monitoring Report required to be submitted by Part I.C.1 of this permit after becoming aware of the occurrence of such noncompliance.
- c. Any written report required to be submitted to the Director or Designee by Part I.C.2 a. or b. shall be submitted using a Noncompliance Notification Form (ADEM Form 421) available on the Department's website (<http://adem.alabama.gov/DeptForms/Form421.pdf>) and include the following information:

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

- (2) The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and
- (3) A description of the steps taken and/or being taken to reduce or eliminate the noncomplying discharge and to prevent its recurrence.

#### **D. OTHER REPORTING AND NOTIFICATION REQUIREMENTS**

##### **1. Anticipated Noncompliance**

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

##### **2. Termination of Discharge**

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

##### **3. Updating Information**

- a. The permittee shall inform the Director of any change in the permittee's mailing address, telephone number or in the permittee's designation of a facility contact or office having the authority and responsibility to prevent and abate violations of the AWPCA, the Department's Rules, and the terms and conditions of this permit, in writing, no later than ten (10) days after such change. Upon request of the Director or his designee, the permittee shall furnish the Director with an update of any information provided in the permit application.
- b. If the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information with a written explanation for the mistake and/or omission.

##### **4. Duty to Provide Information**

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

##### **5. Cooling Water and Boiler Water Additives**

- a. The permittee shall notify the Director in writing not later than thirty (30) days prior to instituting the use of any biocide corrosion inhibitor or chemical additive in a cooling or boiler system, not identified in the application for this permit, from which discharge is allowed by this permit. Notification is not required for additives that do not contain a heavy metal(s) as an active ingredient and that pass through a wastewater treatment system prior to discharge nor is notification required for additives that should not reasonably be expected to cause the cooling water or boiler water to exhibit toxicity as determined by analysis of manufacturer's data or testing by the permittee. Such notification shall include:
  - (1) name and general composition of biocide or chemical;
  - (2) 96-hour median tolerance limit data for organisms representative of the biota of the waterway into which the discharge will ultimately reach;
  - (3) quantities to be used;
  - (4) frequencies of use;
  - (5) proposed discharge concentrations; and
  - (6) EPA registration number, if applicable.
- b. The use of a biocide or additive containing tributyl tin, tributyl tin oxide, zinc, chromium or related compounds in cooling or boiler system(s), from which a discharge regulated by this permit occurs, is prohibited except as exempted below. The use of a biocide or additive containing zinc, chromium or related compounds may be used in special circumstances if (1) the permit contains limits for these substances, or (2) the applicant demonstrates during the application process that the use of zinc, chromium or related compounds as a biocide or additive will not pose a reasonable potential to violate the applicable State water quality standards for these substances. The use of any additive, not identified in this permit or in the

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

**6. Permit Issued Based on Estimated Characteristics**

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

**E. SCHEDULE OF COMPLIANCE**

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

**COMPLIANCE SHALL BE ATTAINED ON THE EFFECTIVE DATE OF THIS PERMIT**

2. Due to the elevated levels of Ammonia (as N) reported in the storm water discharges, within 180 days from the effective date of this Permit, the Permittee shall update and submit the updated Best Management Practices (BMP) Plan to the Department. The BMP Plan shall include steps to be taken to reduce levels of Ammonia (as N) in the storm water discharges from the site.
3. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

**PART II: OTHER REQUIREMENTS, RESPONSIBILITIES, AND DUTIES****A. OPERATIONAL AND MANAGEMENT REQUIREMENTS****1. Facilities Operation and Maintenance**

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

**2. Best Management Practices**

- a. Dilution water shall not be added to achieve compliance with discharge limitations except when the Director or his designee has granted prior written authorization for dilution to meet water quality requirements.
- b. The permittee shall prepare, implement, and maintain a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 C.F.R. Section 112 if required thereby.
- c. The permittee shall prepare, submit for approval and implement a Best Management Practices (BMP) Plan for containment of any or all process liquids or solids, in a manner such that these materials do not present a significant potential for discharge, if so required by the Director or his designee. When submitted and approved, the BMP Plan shall become a part of this permit and all requirements of the BMP Plan shall become requirements of this permit.

**3. Spill Prevention, Control, and Management**

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

**B. OTHER RESPONSIBILITIES****1. Duty to Mitigate Adverse Impacts**

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

**2. Right of Entry and Inspection**

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

- a. enter upon the permittee's premises where a regulated facility or activity or point source is located or conducted, or where records must be kept under the conditions of the permit;
- b. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and
- d. sample or monitor, for the purposes of assuring permit compliance or as otherwise authorized by the AWPCA, any substances or parameters at any location.

**C. BYPASS AND UPSET****1. Bypass**

- a. Any bypass is prohibited except as provided in b. and c. below:
- b. A bypass is not prohibited if:

- (1) It does not cause any discharge limitation specified in Provision I. A. of this permit to be exceeded;
  - (2) It enters the same receiving stream as the permitted outfall; and
  - (3) It is necessary for essential maintenance of a treatment or control facility or system to assure efficient operation of such facility or system.
- c. A bypass is not prohibited and need not meet the discharge limitations specified in Provision I. A. of this permit if:
- (1) It is unavoidable to prevent loss of life, personal injury, or severe property damage;
  - (2) There are no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and
  - (3) The permittee submits a written request for authorization to bypass to the Director at least ten (10) days prior to the anticipated bypass (if possible), the permittee is granted such authorization, and the permittee complies with any conditions imposed by the Director to minimize any adverse impact on human health or the environment resulting from the bypass.
- d. The permittee has the burden of establishing that each of the conditions of Provision II.C.1.b. or c. have been met to qualify for an exception to the general prohibition against bypassing contained in a. and an exemption, where applicable, from the discharge limitations specified in Provision I. A. of this permit.

## 2. Upset

- a. A discharge which results from an upset need not meet the discharge limitations specified in Provision I. A. of this permit if:
- (1) No later than 24-hours after becoming aware of the occurrence of the upset, the permittee orally reports the occurrence and circumstances of the upset to the Director or his designee; and
  - (2) No later than five (5) days after becoming aware of the occurrence of the upset, the permittee furnishes the Director with evidence, including properly signed, contemporaneous operating logs, or other relevant evidence, demonstrating that (i) an upset occurred; (ii) the permittee can identify the specific cause(s) of the upset; (iii) the permittee's facility was being properly operated at the time of the upset; and (iv) the permittee promptly took all reasonable steps to minimize any adverse impact on human health or the environment resulting from the upset.
- b. The permittee has the burden of establishing that each of the conditions of Provision II. C.2.a. of this permit have been met to qualify for an exemption from the discharge limitations specified in Provision I.A. of this permit.

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

### 1. Duty to Comply

- a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the AWPCA and the FWPCA and is grounds for enforcement action, for permit termination, revocation and reissuance, suspension, modification; or denial of a permit renewal application.
- b. The necessity to halt or reduce production or other activities in order to maintain compliance with the conditions of the permit shall not be a defense for a permittee in an enforcement action.
- c. The discharge of a pollutant from a source not specifically identified in the permit application for this permit and not specifically included in the description of an outfall in this permit is not authorized and shall constitute noncompliance with this permit.
- d. The permittee shall take all reasonable steps, including cessation of production or other activities, to minimize or prevent any violation of this permit or to minimize or prevent any adverse impact of any permit violation.
- e. Nothing in this permit shall be construed to preclude and negate the permittee's responsibility or liability to apply for, obtain, or comply with other ADEM, Federal, State, or Local Government permits, certifications, licenses, or other approvals.

**2. Removed Substances**

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

**3. Loss or Failure of Treatment Facilities**

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

**4. Compliance with Statutes and Rules**

- a. This permit has been issued under ADEM Administrative Code, Chapter 335-6-6. All provisions of this chapter, that are applicable to this permit, are hereby made a part of this permit. A copy of this chapter may be obtained for a small charge from the Office of General Counsel, Alabama Department of Environmental Management, 1400 Coliseum Blvd., Montgomery, AL 36130.
- b. This permit does not authorize the noncompliance with or violation of any Laws of the State of Alabama or the United States of America or any regulations or rules implementing such laws. FWPCA, 33 U.S.C. Section 1319, and Code of Alabama 1975, Section 22-22-14.

**E. PERMIT TRANSFER, MODIFICATION, SUSPENSION, REVOCATION, AND REISSUANCE****1. Duty to Reapply or Notify of Intent to Cease Discharge**

- a. If the permittee intends to continue to discharge beyond the expiration date of this permit, the permittee shall file a complete permit application for reissuance of this permit at least 180 days prior to its expiration. If the permittee does not intend to continue discharge beyond the expiration of this permit, the permittee shall submit written notification of this intent which shall be signed by an individual meeting the signatory requirements for a permit application as set forth in ADEM Administrative Code Rule 335-6-6-.09.
- b. Failure of the permittee to apply for reissuance at least 180 days prior to permit expiration will void the automatic continuation of the expiring permit provided by ADEM Administrative Code Rule 335-6-6-.06 and should the permit not be reissued for any reason any discharge after expiration of this permit will be an unpermitted discharge.

**2. Change in Discharge**

- a. The permittee shall apply for a permit modification at least 180 days in advance of any facility expansion, production increase, process change, or other action that could result in the discharge of additional pollutants or increase the quantity of a discharged pollutant such that existing permit limitations would be exceeded or that could result in an additional discharge point. This requirement applies to pollutants that are or that are not subject to discharge limitations in this permit. No new or increased discharge may begin until the Director has authorized it by issuance of a permit modification or a reissued permit.
- b. The permittee shall notify the Director as soon as it is known or there is reason to believe:
  - (1) That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
    - (i) one hundred micrograms per liter;
    - (ii) two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter for antimony;
    - (iii) five times the maximum concentration value reported for that pollutant in the permit application; or
  - (2) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

- (i) five hundred micrograms per liter;
- (ii) one milligram per liter for antimony;
- (iii) ten times the maximum concentration value reported for that pollutant in the permit application.

### 3. Transfer of Permit

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

### 4. Permit Modification and Revocation

- a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:
  - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;
  - (2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or
  - (3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.
- b. This permit may be modified during its term for cause, including but not limited to, the following:
  - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;
  - (2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;
  - (3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;
  - (4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;
  - (5) Errors in calculation of discharge limitations or typographical or clerical errors were made;
  - (6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;
  - (7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;
  - (8) To agree with a granted variance under 301(c), 301(g), 301(h), 301(k), or 316(a) of the FWPCA or for fundamentally different factors;
  - (9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;
  - (10) When required by the reopener conditions in this permit;
  - (11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);

- (12) Upon failure of the state to notify, as required by Section 402(b)(3) of the FWPCA, another state whose waters may be affected by a discharge permitted by this permit;
- (13) When required to correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions; or
- (14) When requested by the permittee and the Director determines that the modification has cause and will not result in a violation of federal or state law, regulations or rules.

#### **5. Permit Termination**

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

- a. Violation of any term or condition of this permit;
- b. The permittee's misrepresentation or failure to disclose fully all relevant facts in the permit application or during the permit issuance process or the permittee's misrepresentation of any relevant facts at any time;
- c. Materially false or inaccurate statements or information in the permit application or the permit;
- d. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge;
- e. The permittee's discharge threatens human life or welfare or the maintenance of water quality standards;
- f. Permanent closure of the facility generating the wastewater permitted to be discharged by this permit or permanent cessation of wastewater discharge;
- g. New or revised requirements of any applicable standard or limitation that is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA that the Director determines cannot be complied with by the permittee; or
- h. Any other cause allowed by the ADEM Administrative Code, Chapter 335-6-6.

#### **6. Permit Suspension**

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

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

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

### **F. COMPLIANCE WITH TOXIC POLLUTANT STANDARD OR PROHIBITION**

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

### **G. DISCHARGE OF WASTEWATER GENERATED BY OTHERS**

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

## **PART III: OTHER PERMIT CONDITIONS**

### **A. CIVIL AND CRIMINAL LIABILITY**

#### **1. Tampering**

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

#### **2. False Statements**

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

#### **3. Permit Enforcement**

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

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

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

(2) An action for damages;

(3) An action for injunctive relief; or

(4) An action for penalties.

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

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

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

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

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

#### **4. Relief from Liability**

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

### **B. OIL AND HAZARDOUS SUBSTANCE LIABILITY**

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

### **C. PROPERTY AND OTHER RIGHTS**

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

#### D. AVAILABILITY OF REPORTS

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

#### E. EXPIRATION OF PERMITS FOR NEW OR INCREASED DISCHARGES

1. If this permit was issued for a new discharger or new source, this permit shall expire eighteen months after the issuance date if construction of the facility has not begun during the eighteen-month period.
2. If this permit was issued or modified to allow the discharge of increased quantities of pollutants to accommodate the modification of an existing facility and if construction of this modification has not begun during the eighteen month period after issuance of this permit or permit modification, this permit shall be modified to reduce the quantities of pollutants allowed to be discharged to those levels that would have been allowed if the modification of the facility had not been planned.
3. Construction has begun when the owner or operator has:
  - a. begun, or caused to begin as part of a continuous on-site construction program:
    - (1) any placement, assembly, or installation of facilities or equipment; or
    - (2) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or
  - b. entered into a binding contractual obligation for the purpose of placement, assembly, or installation of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under the paragraph. The entering into a lease with the State of Alabama for exploration and production of hydrocarbons shall also be considered beginning construction.

#### F. COMPLIANCE WITH WATER QUALITY STANDARDS

1. On the basis of the permittee's application, plans, or other available information, the Department has determined that compliance with the terms and conditions of this permit should assure compliance with the applicable water quality standards.
2. Compliance with permit terms and conditions notwithstanding, if the permittee's discharge(s) from point sources identified in Provision I. A. of this permit cause or contribute to a condition in contravention of state water quality standards, the Department may require abatement action to be taken by the permittee in emergency situations or modify the permit pursuant to the Department's Rules, or both.
3. If the Department determines, on the basis of a notice provided pursuant to this permit or any investigation, inspection or sampling, that a modification of this permit is necessary to assure maintenance of water quality standards or compliance with other provisions of the AWPCA or FWPCA, the Department may require such modification and, in cases of emergency, the Director may prohibit the discharge until the permit has been modified.

#### G. GROUNDWATER

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

#### H. DEFINITIONS

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

3. Arithmetic Mean – means the summation of the individual values of any set of values divided by the number of individual values.
4. AWPCA - means the Alabama Water Pollution Control Act.
5. BOD – means the five-day measure of the pollutant parameter biochemical oxygen demand.
6. Bypass - means the intentional diversion of waste streams from any portion of a treatment facility.
7. CBOD – means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.
8. Daily discharge - means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.
9. Daily maximum - means the highest value of any individual sample result obtained during a day.
10. Daily minimum - means the lowest value of any individual sample result obtained during a day.
11. Day - means any consecutive 24-hour period.
12. Department - means the Alabama Department of Environmental Management.
13. Director - means the Director of the Department.
14. Discharge - means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other wastes into waters of the state". Code of Alabama 1975, Section 22-22-1(b)(8).
15. Discharge Monitoring Report (DMR) - means the form approved by the Director to accomplish reporting requirements of an NPDES permit.
16. DO – means dissolved oxygen.
17. 8HC – means 8-hour composite sample, including any of the following:
  - a. The mixing of at least 5 equal volume samples collected at constant time intervals of not more than 2 hours over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
  - b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
18. EPA - means the United States Environmental Protection Agency.
19. FC – means the pollutant parameter fecal coliform.
20. Flow – means the total volume of discharge in a 24-hour period.
21. FWPCA - means the Federal Water Pollution Control Act.
22. Geometric Mean – means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).
23. Grab Sample – means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.
24. Indirect Discharger – means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.
25. Industrial User – means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category "Division D – Manufacturing" and such other classes of significant waste producers as, by regulation, the Director deems appropriate.
26. MGD – means million gallons per day.

27. Monthly Average – means, other than for fecal coliform bacteria, the arithmetic mean of the entire composite or grab samples taken for the daily discharges collected in one month period. The monthly average for fecal coliform bacteria is the geometric mean of daily discharge samples collected in a one month period. The monthly average for flow is the arithmetic mean of all flow measurements taken in a one month period.
28. New Discharger – means a person, owning or operating any building, structure, facility or installation:
  - a. from which there is or may be a discharge of pollutants;
  - b. that did not commence the discharge of pollutants prior to August 13, 1979, and which is not a new source; and
  - c. which has never received a final effective NPDES permit for dischargers at that site.
29. NH3-N – means the pollutant parameter ammonia, measured as nitrogen.
30. Permit application - means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.
31. Point source - means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, . . . from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. Section 1362(14).
32. Pollutant - includes for purposes of this permit, but is not limited to, those pollutants specified in Code of Alabama 1975, Section 22-22-1(b)(3) and those effluent characteristics specified in Provision I. A. of this permit.
33. Privately Owned Treatment Works – means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a "POTW".
34. Publicly Owned Treatment Works – means a wastewater collection and treatment facility owned by the State, municipality, regional entity composed of two or more municipalities, or another entity created by the State or local authority for the purpose of collecting and treating municipal wastewater.
35. Receiving Stream – means the "waters" receiving a "discharge" from a "point source".
36. Severe property damage - means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
37. Significant Source – means a source which discharges 0.025 MGD or more to a POTW or greater than five percent of the treatment work's capacity, or a source which is a primary industry as defined by the U.S. EPA or which discharges a priority or toxic pollutant.
38. Solvent – means any virgin, used or spent organic solvent(s) identified in the F-Listed wastes (F001 through F005) specified in 40 CFR 261.31 that is used for the purpose of solubilizing other materials.
39. TKN – means the pollutant parameter Total Kjeldahl Nitrogen.
40. TON – means the pollutant parameter Total Organic Nitrogen.
41. TRC – means Total Residual Chlorine.
42. TSS – means the pollutant parameter Total Suspended Solids.
43. 24HC – means 24-hour composite sample, including any of the following:
  - a. the mixing of at least 12 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;
  - b. a sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected; or
  - c. a sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.

44. Upset - means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
45. Waters - means "[a]ll waters of any river, stream, watercourse, pond, lake, coastal, ground or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely upon the property of a single individual, partnership or corporation unless such waters are used in interstate commerce." Code of Alabama 1975, Section 22-22-1(b)(2). Waters "include all navigable waters" as defined in Section 502(7) of the FWPCA, 22 U.S.C. Section 1362(7), which are within the State of Alabama.
46. Week - means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.
47. Weekly (7-day and calendar week) Average - is the arithmetic mean of all samples collected during a consecutive 7-day period or calendar week, whichever is applicable. The calendar week is defined as beginning on Sunday and ending on Saturday. Weekly averages shall be calculated for all calendar weeks with Saturdays in the month. If a calendar week overlaps two months (i.e., the Sunday is in one month and the Saturday in the following month), the weekly average calculated for the calendar week shall be included in the data for the month that contains the Saturday.

#### **I. SEVERABILITY**

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

**PART IV: ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS****A. BEST MANAGEMENT PRACTICES (BMP) PLAN REQUIREMENTS****1. BMP Plan**

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

**2. Plan Content**

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

- a. Establish specific objectives for the control of pollutants:
  - (1) Each facility component or system shall be examined for its potential for causing a release of significant amounts of pollutants to waters of the State due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.
  - (2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g. precipitation), or circumstances to result in significant amounts of pollutants reaching surface waters, the plan should include a prediction of the direction, rate of flow, and total quantity of pollutants which could be discharged from the facility as a result of each condition or circumstance.
- b. Establish specific best management practices to meet the objectives identified under paragraph a. of this section, addressing each component or system capable of causing a release of significant amounts of pollutants to the waters of the State, and identifying specific preventative or remedial measures to be implemented;
- c. Establish a program to identify and repair leaking equipment items and damaged containment structures, which may contribute to contaminated stormwater runoff. This program must include regular visual inspections of equipment, containment structures and of the facility in general to ensure that the BMP is continually implemented and effective;
- d. Prevent the spillage or loss of fluids, oil, grease, gasoline, etc. from vehicle and equipment maintenance activities and thereby prevent the contamination of stormwater from these substances;
- e. Prevent or minimize stormwater contact with material stored on site;
- f. Designate by position or name the person or persons responsible for the day to day implementation of the BMP;
- g. Provide for routine inspections, on days during which the facility is manned, of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general. Routine inspections should be done at a frequency to ensure that the BMP is continually implemented and effective and in no case less frequent than once per year;
- h. Provide for the use and disposal of any material used to absorb spilled fluids that could contaminate stormwater;
- i. Develop a solvent management plan, if solvents are used on site. The solvent management plan shall include as a minimum lists of the solvents on site; the disposal method of solvents used instead of dumping, such as reclamation, contract hauling; and the procedures for assuring that solvents do not routinely spill or leak into the stormwater;
- j. Provide for the disposal of all used oils, hydraulic fluids, firefighting foams, solvent degreasing material, etc. in accordance with good management practices and any applicable state or federal regulations;
- k. Include a diagram of the facility showing the locations where stormwater exits the facility, the locations of any structure or other mechanisms intended to prevent pollution of stormwater or to remove pollutants from stormwater, the locations of any collection and handling systems;
- l. Provide control sufficient to prevent or control pollution of stormwater by soil particles to the degree required to maintain compliance with the water quality standard for turbidity applicable to the waterbody(s) receiving discharge(s) under this permit;
- m. Provide spill prevention, control, and/or management sufficient to prevent or minimize contaminated stormwater runoff. Any containment system used to implement this requirement shall be constructed of materials compatible with the

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

- n. Provide and maintain curbing, diking or other means of isolating process areas to the extent necessary to allow segregation and collection for treatment of contaminated stormwater from process areas;
- o. Be reviewed by plant engineering staff and the plant manager; and
- p. Bear the signature of the plant manager.

### **3. Compliance Schedule**

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

### **4. Department Review**

- a. When requested by the Director or his designee, the permittee shall make the BMP available for Department review.
- b. The Director or his designee may notify the permittee at any time that the BMP is deficient and require correction of the deficiency.
- c. The permittee shall correct any BMP deficiency identified by the Director or his designee within 30 days of receipt of notification and shall certify to the Department that the correction has been made and implemented.

### **5. Administrative Procedures**

- a. A copy of the BMP shall be maintained at the facility and shall be available for inspection by representatives of the Department.
- b. A log of the routine inspection required above shall be maintained at the facility and shall be available for inspection by representatives of the Department. The log shall contain records of all inspections performed for the last three years and each entry shall be signed by the person performing the inspection.
- c. The permittee shall provide training for any personnel required to implement the BMP and shall retain documentation of such training at the facility. This documentation shall be available for inspection by representatives of the Department. Training shall be performed prior to the date that implementation of the BMP is required.
- d. BMP Plan Modification. The permittee shall amend the BMP plan whenever there is a change in the facility or change in operation of the facility which materially increases the potential for the ancillary activities to result in a discharge of significant amounts of pollutants.
- e. BMP Plan Review. The permittee shall complete a review and evaluation of the BMP plan at least once every three years from the date of preparation of the BMP plan. Documentation of the BMP Plan review and evaluation shall be signed and dated by the Plant Manager.

## **B. STORMWATER FLOW MEASUREMENT AND SAMPLING REQUIREMENTS**

### **1. Stormwater Flow Measurement**

- a. All stormwater samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches.
- b. The total volume of stormwater discharged for the event must be monitored, including the date and duration (in hours) and rainfall (in inches) for storm event(s) sampled. The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event must be a minimum of 72 hours. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.
- c. The volume may be measured using flow measuring devices, or estimated based on a modification of the Rational Method using total depth of rainfall, the size of the drainage area serving a stormwater outfall, and an estimate of the runoff coefficient of the drainage area. This information must be recorded as part of the sampling procedure and records retained according to Part I.B. of this permit.

**2. Stormwater Sampling**

- a. A grab sample, if required by this permit, shall be taken during the first thirty minutes of the discharge (or as soon thereafter as practicable); and a flow-weighted composite sample, if required by this permit, shall be taken for the entire event or for the first three hours of the event.
- b. All test procedures will be in accordance with part I.B. of this permit.

## ADEM PERMIT RATIONALE

PREPARED DATE: April 2, 2026  
PREPARED BY: Wayne Holt

Permittee Name: G2O Technologies, LLC  
Facility Name: G2O Technologies, LLC - Coosa Pines  
Permit Number: AL0077186

PERMIT IS REISSUANCE DUE TO EXPIRATION

### DISCHARGE SERIAL NUMBERS (DSN) & DESCRIPTIONS:

| DSN | Description                                                           |
|-----|-----------------------------------------------------------------------|
| 001 | Stormwater from non-process areas associated with alum manufacturing. |
| 002 | Stormwater from non-process areas associated with alum manufacturing. |

INDUSTRIAL CATEGORY: NON-CATEGORICAL

MAJOR: No

### STREAM INFORMATION:

Receiving Stream: Unnamed Tributary to Coosa River  
Classification: Fish & Wildlife  
River Basin: Coosa River Basin  
7Q10: 0.0 cfs  
303(d) List: No  
Impairment: N/A  
TMDL: No

### DISCUSSION:

The facility produces liquid aluminum sulfate. The two principal raw materials used are aluminum trihydrate and sulfuric acid. Both raw materials are delivered via bulk railcars and are off-loaded to storage tanks inside containment areas. The sulfuric acid is added to water inside a brick lined digester to begin the reaction. The aluminum trihydrate is fed slowly over time to produce the aluminum sulfate. The product is then transferred to a settling tank and filtered into storage tanks for shipping. The product in storage is then filtered again into a designated truck and sold to customers.

The facility has bulk storage tanks that come in contact with rainwater. These tanks are located near the western boundary of the facility and contain aluminum sulfate (alum), aluminum trihydrate, and sulfuric acid. All tanks have secondary containment and sump pumps. The dumper and truck loading areas contain berms that funnel runoff into the storage tank secondary containment area. The parking and traffic areas on the western side of the plant is diverted to a stormwater collection basin equipped with sump pumps. Accumulated stormwater is diverted to a drainage ditch that traverses the southern boundary and discharges to Outfalls DSN001 and DSN002. This permit authorizes the discharge of stormwater only.

ADEM Administrative Rule 335-6-10-.12 requires applicants to new or expanded discharges to Tier II waters demonstrate that the proposed discharge is necessary for important economic or social development in the area in

which the waters are located. The application submitted by the facility is not for a new or expanded discharge. Therefore, the applicant is not required to demonstrate that the discharge is necessary for economic and social development.

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

**DSN001S: Stormwater from non-process areas associated with alum manufacturing**

| Parameter                                                                   | Quantity or Loading |                           | Units | Quality or Concentration  |       |                           | Units | Sample Frequency | Sample Type | Seasonal   | Basis |
|-----------------------------------------------------------------------------|---------------------|---------------------------|-------|---------------------------|-------|---------------------------|-------|------------------|-------------|------------|-------|
| pH (00400)<br>Effluent Gross Value                                          | *****               | *****                     | ***** | (Report)<br>Minimum Daily | ***** | (Report)<br>Maximum Daily | S.U.  | Semi-Annually    | Grab        | All Months | BPJ   |
| Solids, Total Suspended (00530)<br>Effluent Gross Value                     | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually    | Grab        | All Months | BPJ   |
| Oil & Grease (00556)<br>Effluent Gross Value                                | *****               | *****                     | ***** | *****                     | ***** | 15<br>Maximum Daily       | mg/l  | Semi-Annually    | Grab        | All Months | BPJ   |
| Nitrogen, Ammonia Total (As N)<br>(00610)<br>Effluent Gross Value           | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually    | Grab        | All Months | BPJ   |
| Nitrogen, Kjeldahl Total (As N)<br>(00625)<br>Effluent Gross Value          | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually    | Grab        | All Months | BPJ   |
| Phosphorus, Total (As P) (00665)<br>Effluent Gross Value                    | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually    | Grab        | All Months | BPJ   |
| Aluminum, Total Recoverable<br>(01104)<br>Effluent Gross Value              | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually    | Grab        | All Months | BPJ   |
| Flow, In Conduit or Thru Treatment<br>Plant (50050)<br>Effluent Gross Value | *****               | (Report)<br>Maximum Daily | MGD   | *****                     | ***** | *****                     | ***** | Semi-Annually    | Estimate    | All Months | BPJ   |

**DSN002S: Stormwater from non-process areas associated with alum manufacturing**

| Parameter                                                                   | Quantity or Loading |                           | Units | Quality or Concentration  |       |                           | Units | Sample Freq   | Sample Type | Seasonal   | Basis |
|-----------------------------------------------------------------------------|---------------------|---------------------------|-------|---------------------------|-------|---------------------------|-------|---------------|-------------|------------|-------|
| pH (00400)<br>Effluent Gross Value                                          | *****               | *****                     | ***** | (Report)<br>Minimum Daily | ***** | (Report)<br>Maximum Daily | S.U.  | Semi-Annually | Grab        | All Months | BPJ   |
| Solids, Total Suspended (00530)<br>Effluent Gross Value                     | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually | Grab        | All Months | BPJ   |
| Oil & Grease (00556)<br>Effluent Gross Value                                | *****               | *****                     | ***** | *****                     | ***** | 15<br>Maximum Daily       | mg/l  | Semi-Annually | Grab        | All Months | BPJ   |
| Nitrogen, Ammonia Total (As N)<br>(00610)<br>Effluent Gross Value           | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually | Grab        | All Months | BPJ   |
| Phosphorus, Total (As P) (00665)<br>Effluent Gross Value                    | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually | Grab        | All Months | BPJ   |
| Aluminum, Total Recoverable<br>(01104)<br>Effluent Gross Value              | *****               | *****                     | ***** | *****                     | ***** | (Report)<br>Maximum Daily | mg/l  | Semi-Annually | Grab        | All Months | BPJ   |
| Flow, In Conduit or Thru Treatment<br>Plant (50050)<br>Effluent Gross Value | *****               | (Report)<br>Maximum Daily | MGD   | *****                     | ***** | *****                     | ***** | Semi-Annually | Estimate    | All Months | BPJ   |

**\*Basis for Permit Limitation**

- BPJ – Best Professional Judgment
- WQBEL – Water Quality Based Effluent Limits
- EGL – Federal Effluent Guideline Limitations
- 303(d) – 303(d) List of Impaired Waters
- TMDL – Total Maximum Daily Load Requirements

## **Discussion**

### **Best Professional Judgment (BPJ)**

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

#### **pH**

pH monitoring is proposed to continue with no limitations and will help to detect any problems with storm water runoff with the materials stored onsite.

#### **Oil & Grease**

The daily maximum limit of 15 mg/l for Oil and Grease should prevent the occurrence of a visible sheen in the stream and has been shown to be achievable through the use of proper BMPs.

#### **Total Suspended Solids (TSS) and Total Recoverable Aluminum**

TSS and Aluminum monitoring will be continued in this permit and will measure the effectiveness of the facility's BMPs.

#### **Ammonia (as Nitrogen) and Total Phosphorus**

Ammonia (as N) and Phosphorus monitoring will be continued in this permit to address any potential nutrient concentration concerns in the facility's discharge. The information gathered in the facility's monitoring will be useful in determining future permit limitations, if necessary.

#### **Nitrogen, Kjeldahl Total (TKN) (Outfall DSN001 only)**

Based on the updated data in EPA Form 2F, monitoring for TKN is proposed for Outfall DSN001 at a frequency of semi-annually.

### **303(d) List of Impaired Waters/Total Maximum Daily Load (TMDL)**

The unnamed tributary to the Coosa River is not listed as being impaired on the 2024 303(d) List nor have there been any developed/finalized TMDL's associated with it; however, the portion of the Coosa River that is the facility's ultimate discharge point into the river is on the 303(d) List of Impaired Waters for PCBs (priority organics) and metals (Mercury). The sources for these impairments are from contaminated sediments and atmospheric deposition, respectively. In addition, there is an established TMDL for this portion for Nutrients and Organic Enrichment/Dissolved Oxygen (OE/DO). The discharge of this facility is not expected to contribute to any of the listed impairments; however, the data collected from the monitoring of TSS, Phosphorus, TKN, and Ammonia (as Nitrogen) will show if the facility is potentially contributing to the impairments and will help determine future permit limitations, if necessary.

### **Schedule of Compliance**

It is required through the BMP Plan that the facility must update and detail steps to be taken to continue to reduce levels of Ammonia in the stormwater discharges from the site. The Permittee is required to submit the updated BMP Plan within 180 days from the effective date of the Permit. The requirement for an updated BMP Plan is proposed in the Schedule of Compliance in Part I.E.2. of the Permit.

### **Best Management Practices (BMP) Plan**

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

The Department has updated the BMP language located in Part IV.A.2.g of the Permit. The Permit Condition now states "Provide for routine inspections, or days during which the facility is manned, of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general. Routine

inspections should be done at a frequency to ensure that the BMP is continually implemented and effective and in no case less frequent than once per year.” This clarification was added to be consistent with 40 CFR Part 122.43(c).

# NPDES Individual Permit Mod/Reissue (Form 187) - Supplementary Information for Industrial Facilities

version 2.11

(Submission #: HQH-QZ6K-S12EH, version 1)

Digitally signed by:  
AEPACS  
Date: 2026.03.18 12:33:49 -05:00  
Reason: Submission Data  
Location: State of Alabama

## Details

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Submission ID HQH-QZ6K-S12EH

## Form Input

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### General Instructions

This form should be used to submit the following permit requests for permitted Industrial Individual NPDES facilities

- Permit Transfers
- Permittee/Facility Name Changes
- Minor Modifications, for example:
  - > Frequency of monitoring or reporting modifications
  - > Changes to interim compliance dates in a schedule of compliance, not including the final compliance date.
  - > Removal of a point source outfall, provided the discharge is terminated and does not result in discharge of pollutants from other outfalls, except in accordance with permit limits.
- Major Modifications, (Any modifications not covered by minor mod's, whether Effluent Limit changes occur or not)
- Reissuances
- Reissuance of a permit due to approaching expiration
- Revocation and Reissuance of permit prior to its scheduled expiration

Applicable Base Fees:

- Permit Transfers and/or Permittee/Facility Name Changes
  - > \$800
- Minor Modifications (see examples above)
  - > \$3,940 (Major Sources)
  - > \$3,120 (Minor Sources)
- Major Modifications
  - > \$17,990 (Major Sources)
  - > \$5,615 (Minor Sources)
- Reissuances
  - > \$17,990 (Major Sources)
  - > \$5,615 (Minor Sources)

For assistance, please click here to determine the permit staff responsible for the site or call (334) 271-7799

### Processing Information

#### Purpose of Application

Reissuance of Permit Due to Approaching Expiration

**Please indicate if the Permittee is applying for a permit transfer and/or name change in addition to permit modification or reissuance:**

None

#### Action Type

Reissuance

**If applicable, briefly describe any planned changes at the facility that are included in this reissuance application:**

N/A

## **General Information**

**SID Permit Number** (if your facility currently holds an SID permit, please provide that number below):

NONE PROVIDED

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

AL0077186

**Is this facility/site only applying for permit coverage for discharges from stormwater?**

Yes

**Is a new stormwater outfall being added?**

No

## **Permit Information**

**Permit Number**

AL0077186

**Current Permittee Name**

G2O Technologies, LLC

**Permittee**

**Permittee Name**

G2O Technologies, LLC

**Mailing Address**

16693 Plant Road

Childersburg, AL 35044

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

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

## **Responsible Official**

**Prefix**

Mr.

**First Name**

Joseph

**Last Name**

Dennis

**Title**

Sr. Director, Safety Health Environment & Quality

**Organization Name**

USALCO

**Phone Type**

Mobile

**Number**

2565104813

**Extension**

**Email**

jdennis@usalco.com

**Mailing Address**

2601 Cannery Avenue

Baltimore, AL 21226

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

Yes

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

#### Existing Permit Contacts

| Affiliation Type                            | Contact Information                    | Remove? |
|---------------------------------------------|----------------------------------------|---------|
| Permittee                                   | G2O Technologies, LLC                  | Keep    |
| Environmental Contact,DMR Contact           | Joseph R Dennis, G2O Technologies LLC  | Keep    |
| Responsible Official,Notification Recipient | Joseph R Dennis, G2O Technologies, LLC | Keep    |

#### Duly Authorized Representative (DAR)

##### Duly Authorized Representative - Delegation of Signatory Authority by Responsible Official

If the permittee has not already prepared a signed and dated delegation form/letter, an optional form can be downloaded from the link below. All information should be completed along with the responsible official's signature and date signed. That signed form can be uploaded in the attachment section below titled "DAR Documentation".

[Optional Delegation of Signatory Authority Form](#)

#### Delegation Document for Duly Authorized Representation (DAR)

[Delegation Letter Alabama.pdf - 03/18/2026 12:13 PM](#)

##### Comment

NONE PROVIDED

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

#### Authorized Rep

##### Prefix

Mr.

##### First Name

Joseph R

##### Last Name

Dennis

##### Title

Sr. Director, Safety Health Environment and Quality

##### Organization Name

G2O Technologies, LLC

##### Phone Type

Business

##### Number

2565104813

##### Extension

##### Email

jdennis@usalco.com

##### Mailing Address

16693 Plant Road

Childersburg, AL 35044

United States

#### Facility/Site Information

**Facility/Site Name**

G2O Technologies, LLC - Coosa Pines

**Organization/Ownership Type**

LLC

**Facility/Site Address or Location Description**

16693 Plant Road

Childersburg, AL 35044

**Facility/Site County**

Talladega

**Detailed Directions to the Facility/Site**

NONE PROVIDED

**Facility Map**

[Plant Facility Map.pdf - 01/12/2026 04:06 PM](#)

**Comment**

NONE PROVIDED

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

[Map Instruction Help](#)

**Facility/Site Front Gate Latitude and Longitude**

33.33297200000000,-86.35833300000000

16693 Plant Road, Childersburg, AL

**SIC Code(s) [Please enter Primary SIC Code first followed by any additional applicable SIC Codes]**

2819-Industrial Inorganic Chemicals

**NAICS Code(s) [Please enter Primary NAICS Code first followed by any additional applicable NAICS Codes]**

325180-Other Basic Inorganic Chemical Manufacturing

**Facility/Site Contact****Prefix**

Mr.

**First Name**

Joseph R

**Last Name**

Dennis

**Title**

Sr. Director, Safety Health Environment and Quality

**Organization Name**

G2O Technologies, LLC

**Phone Type**

Business

**Number**

2565104813

**Extension****Email**

jdennis@usalco.com

**Address**

16693 Plant Road

Childersburg, AL 35044

**DMR Contact(s) (1 of 1)**

**DMR Contact****Prefix**

Mr.

**First Name**

Joseph R

**Last Name**

Dennis

**Title**

Sr. Director, Safety Health Environment and Quality

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

Mobile

2565104813

**Email**

jdennis@usalco.com

**Address**

16693 Plant Road

Childersburg, AL 35044

**Applicant Business Entity Information****Address of Incorporation**

2601 Cannery Avenue

**Agent Designated by the Corporation for Purposes of Service**

| Name          | Address                                    |
|---------------|--------------------------------------------|
| Joseph Dennis | 2601 Cannery Avenue<br>Baltimore, MD 21226 |

**Please provide all corporate officers**

| Name           | Title                     | Address                                    |
|----------------|---------------------------|--------------------------------------------|
| Kenneth Gayer  | Chief Executive Officer   | 2601 Cannery Avenue<br>Baltimore, MD 21226 |
| Hassan Mela    | Chief Financial Officer   | 2601 Cannery Avenue<br>Baltimore, MD 21226 |
| Jason James    | Chief Operations Officer  | 2601 Cannery Avenue<br>Baltimore, MD 21226 |
| Terry Waldo    | Chief Commercial Officer  | 2601 Cannery Avenue<br>Baltimore, MD 21226 |
| James M. Dulko | VP, Research & Dev.       | 2601 Cannery Avenue<br>Baltimore, MD 21226 |
| Danny Dove     | VP, Finance and Secretary | 2601 Cannery Avenue<br>Baltimore, MD 21226 |

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

No

**Does the applicant applying for coverage have Subsidiary Corporations?**

No

**Enforcement History**

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

Yes

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

| Facility/Site Name                  | Permit Number, If Applicable | Type of Action      | Date of Action |
|-------------------------------------|------------------------------|---------------------|----------------|
| G2O Technologies, LLC - Coosa Pines | AL0077186                    | Notice of Violation | 12/09/2025     |

## **Business Activity**

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

[Industrial Section Assignment Map](#)

**If your facility conducts or will be conducting any of the processes listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), please check the category of business activity:**

Inorganic Chemicals

**Give a brief description of all operations at this facility including primary products or services:**

This facility produces aluminum sulfate for water treatment applications. The two primary raw materials are aluminum trihydrate and sulfuric acid. Both raw materials are delivered via bulk railcars and offloaded to storage tanks inside containment areas. The sulfuric acid is added to water inside a brick lined digester to begin the reaction. The aluminum trihydrate is fed slowly over time to produce the aluminum sulfate. The product is then transferred to a settling tank and then filtered into a storage tank for shipping. The product in the storage tank is then filtered again into a dedicated tanker truck and sold to municipal water treatment plants and paper mills.

## **Outfalls (1 of 2)**

001

**Please click below if this discharge no longer exists or is no longer required:**

NONE PROVIDED

**Outfall Identifier**

001

**Receiving Water**

Coosa River

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

Unnamed Tributary

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

Intermittent Discharge

**Estimated Average Daily Flow (MGD)**

0.00144

**Monitoring/Sampling Point Location**

33.33046900000000, -86.35898300000000

## **Outfalls (2 of 2)**

002

**Please click below if this discharge no longer exists or is no longer required:**

NONE PROVIDED

**Outfall Identifier**

002

**Receiving Water**  
Coosa River

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

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

**Estimated Average Daily Flow (MGD)**  
0.00144

**Monitoring/Sampling Point Location**  
33.33115800000000, -86.35595300000000

### **Anti-Degradation Evaluation**

**Is this a new or increased discharge that began after April 3, 1991?**  
No

### **Additional Information**

**Do you share an outfall with another facility?**  
No

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

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

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

| Planned                                       | Yes/No |
|-----------------------------------------------|--------|
| Continuous Wastewater Flow Metering Equipment | No     |
| Automatic Sampling Equipment                  | No     |

**Please attach the process schematic with sampling equipment locations.**

[Plant Facility Map.pdf - 01/21/2026 03:48 PM](#)

**Comment**

NONE PROVIDED

**Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics (Consider production processes as well as air or water pollution treatment processes that may affect the discharge.)?**

No

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

No

### **Biocide/Corrosion Inhibitor Summary Sheet**

NONE PROVIDED

**Comment**

NONE PROVIDED

### **Treatment**

**Is any form of wastewater treatment (see list below) practiced at this facility?**

No

Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the next three years?

No

## **Facility Operational Characteristics**

Indicate whether the facility discharge is:

Continuous through the year

Comments:

The water that leaves the site is rainwater that has the potential to contact process equipment.

## **Non-Discharged Wastes**

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

No

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

No

## **EPA Application Forms**

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

Form 1 - General Information Form required for all applications

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

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

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

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

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

### **EPA Form 1**

3510-1.pdf - 03/18/2026 12:15 PM

**Comment**

NONE PROVIDED

### **Additional EPA Forms (EPA Form 2C, 2D, 2E and/or 2F)**

3510-2F.pdf - 03/18/2026 12:15 PM

**Comment**

NONE PROVIDED

### **Other attachments (as needed)**

G2O TECHNOLOGIES Cburg SPCC 2021.pdf - 03/18/2026 12:24 PM

Responsible Official Letter.pdf - 03/18/2026 12:24 PM

Plant Facility Map.pdf - 03/18/2026 12:24 PM

**Comment**

NONE PROVIDED

## **Additional Attachments**

Please attach any additional information as needed.

NONE PROVIDED

**Comment**

NONE PROVIDED

## **Application Preparer**

**Application Preparer****Prefix**

Mr.

**First Name**

Joseph R

**Last Name**

Dennis

**Title**

Sr. Director, Safety Health Environment and Quality

**Organization Name**

G2O Technologies, LLC

**Phone Type**

Business

**Number**

2565104813

**Extension****Email**

jdennis@usalco.com

**Address**

16693 Plant Road

Childersburg, AL 35044

## Agreements and Signature(s)

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### SUBMISSION AGREEMENTS

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

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

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

**NOTE: 335-6-5-.14 SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS.**

The application shall be signed by a responsible official, a request for variance from categorical pretreatment standards, and a category determination request shall be signed by a responsible official, as indicated below:

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

Signed By Joseph Dennis on 03/18/2026 at 12:26 PM



October 1, 2020

Alabama Department of Environmental Management  
1400 Coliseum Boulevard  
Montgomery, Alabama 36110

Attn: Mr. Hunter Hill

Re: **G2O Technologies LLC**  
**Delegated Signature Authority**

Dear Mr. Hill:

Pursuant to 40 CFR 122.22 (Signatory Requirements) and relative State issued permits, I hereby delegate authority for all applications, reports and other environmental matters required for G2O Technologies LLC's Alabama facilities (Childersburg, Demopolis, Pennington) to Mr. Joseph R. Dennis, Director Environmental Health and Safety and/or the applicable facility's Plant Manager.

If you have any questions, please contact Mr. Joseph Dennis at 256-510-4813 or [joe.dennis@g2otech.com](mailto:joe.dennis@g2otech.com).

Best regards,

A handwritten signature in black ink, appearing to read "D B Linder", is written over a light blue horizontal line.

Derek B. Linder  
Vice President, Supply Chain

Cc: J. Dennis – G2O Technologies LLC  
A. Bier – G2O Technologies LLC  
J. Chatman – G2O Technologies LLC



April 12, 2023

Mississippi Department of Environmental Quality  
Office of Pollution Control  
P.O. Box 2261  
Jackson, MS 39225-2261  
(601) 961-5171

Re: Transfer of Wastewater/Stormwater Discharge Permits – G2O Technologies Parent, LLC., Centreville, Mississippi

To Whom It May Concern:

On October 19, 2021, Project Aero HoldCo, LLC, the parent company of USALCO, LLC ("USALCO"), along with the equity owners of G2O Technologies Parent, LLC ("G2O") entered into an agreement to combine their respective businesses. As a result, G2O is now a wholly owned subsidiary of USALCO.

G2O operates a facility permitted by MDEQ at 700 Highway 33, Centreville, Wilkinson County, MS 39631. Following the transaction described above, G2O remains the permittee with respect to the facility's coverage under Industrial Stormwater General Permit No. MSR001912 and Water Pollution Control Permit No. MS0048097. G2O has no plans to change the facility's operations/processes, nor is the permittee or its name changing.

Additionally, Joe Dennis, who is USALCO's Senior Director of Safety, Health, Environment & Quality, is designated as our Responsible Official authorized to sign environmental permits on behalf of USALCO and its subsidiary, G2O.

If you have any questions, please feel free to contact me at (410) 354-0100 x2304

Yours truly,

A handwritten signature in cursive script that reads 'John V. Sobchak'.

John V. Sobchak  
Chief Financial Officer

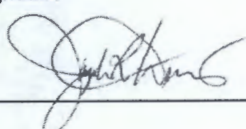
|                                                                                      |                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EPA Identification Number                                                            |                                                                                   | NPDES Permit Number<br>AL0077186                                                                                                                                                                                                                                                                                                                                                          | Facility Name<br>G2O Technologies | Form Approved 03/05/19<br>OMB No. 2040-0004                                                                                                                                                                                                                     |
| Form<br>1<br>NPDES                                                                   |  | U.S. Environmental Protection Agency<br>Application for NPDES Permit to Discharge Wastewater<br><b>GENERAL INFORMATION</b>                                                                                                                                                                                                                                                                |                                   |                                                                                                                                                                                                                                                                 |
| <b>SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(f) and (f)(1))</b> |                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
| Activities Requiring an NPDES Permit                                                 | 1.1                                                                               | <b>Applicants Not Required to Submit Form 1</b>                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      | 1.1.1                                                                             | Is the facility a new or existing <b>publicly owned treatment works</b> ?<br>If yes, STOP. Do NOT complete Form 1. Complete Form 2A. <input checked="" type="checkbox"/> No                                                                                                                                                                                                               | 1.1.2                             | Is the facility a new or existing <b>treatment works treating domestic sewage</b> ?<br>If yes, STOP. Do NOT complete Form 1. Complete Form 2S. <input checked="" type="checkbox"/> No                                                                           |
|                                                                                      | 1.2                                                                               | <b>Applicants Required to Submit Form 1</b>                                                                                                                                                                                                                                                                                                                                               |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      | 1.2.1                                                                             | Is the facility a <b>concentrated animal feeding operation</b> or a <b>concentrated aquatic animal production facility</b> ?<br><input type="checkbox"/> Yes → Complete Form 1 and Form 2B. <input checked="" type="checkbox"/> No                                                                                                                                                        | 1.2.2                             | Is the facility an <b>existing manufacturing, commercial, mining, or silvicultural facility that is currently discharging process wastewater</b> ?<br><input type="checkbox"/> Yes → Complete Form 1 and Form 2C. <input checked="" type="checkbox"/> No        |
|                                                                                      | 1.2.3                                                                             | Is the facility a <b>new manufacturing, commercial, mining, or silvicultural facility</b> that has <b>not yet commenced to discharge</b> ?<br><input type="checkbox"/> Yes → Complete Form 1 and Form 2D. <input checked="" type="checkbox"/> No                                                                                                                                          | 1.2.4                             | Is the facility a <b>new or existing manufacturing, commercial, mining, or silvicultural facility</b> that <b>discharges only nonprocess wastewater</b> ?<br><input type="checkbox"/> Yes → Complete Form 1 and Form 2E. <input checked="" type="checkbox"/> No |
|                                                                                      | 1.2.5                                                                             | Is the facility a <b>new or existing facility</b> whose discharge is composed entirely of <b>stormwater associated with industrial activity</b> or whose discharge is composed of <b>both stormwater and non-stormwater</b> ?<br><input checked="" type="checkbox"/> Yes → Complete Form 1 and Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). <input type="checkbox"/> No |                                   |                                                                                                                                                                                                                                                                 |
| <b>SECTION 2. NAME, MAILING ADDRESS, AND LOCATION (40 CFR 122.21(f)(2))</b>          |                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
| Name, Mailing Address, and Location                                                  | 2.1                                                                               | <b>Facility Name</b>                                                                                                                                                                                                                                                                                                                                                                      |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      |                                                                                   | G2O Technologies, LLC                                                                                                                                                                                                                                                                                                                                                                     |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      | 2.2                                                                               | <b>EPA Identification Number</b>                                                                                                                                                                                                                                                                                                                                                          |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      |                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      | 2.3                                                                               | <b>Facility Contact</b>                                                                                                                                                                                                                                                                                                                                                                   |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      | Name (first and last)<br>Joseph R. Dennis                                         |                                                                                                                                                                                                                                                                                                                                                                                           | Title<br>Sr. Director, SHE&Q      | Phone number<br>(256) 378-5556                                                                                                                                                                                                                                  |
|                                                                                      | Email address<br>jdennis@usalco.com                                               |                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
| 2.4                                                                                  | <b>Facility Mailing Address</b>                                                   |                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      | Street or P.O. box<br>16693 Plant Road                                            |                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                                 |
|                                                                                      | City or town<br>Childersburg                                                      | State<br>AL                                                                                                                                                                                                                                                                                                                                                                               | ZIP code<br>35044                 |                                                                                                                                                                                                                                                                 |

|                                                              |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------------|-------------------|---------------------------------------------|--|
| EPA Identification Number                                    |                                                                                      | NPDES Permit Number<br>AL0077186                                                                                                                                                                                                                            |                        | Facility Name<br>G2O Technologies |                   | Form Approved 03/05/19<br>OMB No. 2040-0004 |  |
| Name, Mailing Address,<br>and Location Continued             | 2.5                                                                                  | <b>Facility Location</b>                                                                                                                                                                                                                                    |                        |                                   |                   |                                             |  |
|                                                              | Street, route number, or other specific identifier<br>16693 Plant Road - Highway 235 |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              | County name<br>Talladega                                                             |                                                                                                                                                                                                                                                             | County code (if known) |                                   |                   |                                             |  |
|                                                              | City or town<br>Childersburg                                                         |                                                                                                                                                                                                                                                             | State<br>AL            |                                   | ZIP code<br>35044 |                                             |  |
| <b>SECTION 3. SIC AND NAICS CODES (40 CFR 122.21(f)(3))</b>  |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
| SIC and NAICS Codes                                          | 3.1                                                                                  | <b>SIC Code(s)</b>                                                                                                                                                                                                                                          |                        | <b>Description (optional)</b>     |                   |                                             |  |
|                                                              |                                                                                      | 2819                                                                                                                                                                                                                                                        |                        | Industrial Inorganics             |                   |                                             |  |
|                                                              |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              | 3.2                                                                                  | <b>NAICS Code(s)</b>                                                                                                                                                                                                                                        |                        | <b>Description (optional)</b>     |                   |                                             |  |
|                                                              |                                                                                      | 32518                                                                                                                                                                                                                                                       |                        | Other Basic Inorganic Chemicals   |                   |                                             |  |
|                                                              |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
| <b>SECTION 4. OPERATOR INFORMATION (40 CFR 122.21(f)(4))</b> |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
| Operator Information                                         | 4.1                                                                                  | <b>Name of Operator</b>                                                                                                                                                                                                                                     |                        |                                   |                   |                                             |  |
|                                                              | G2O Technologies, LLC                                                                |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              | 4.2                                                                                  | Is the name you listed in Item 4.1 also the owner?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                                                                                                                                   |                        |                                   |                   |                                             |  |
|                                                              | 4.3                                                                                  | <b>Operator Status</b><br><input type="checkbox"/> Public—federal <input type="checkbox"/> Public—state <input type="checkbox"/> Other public (specify) _____<br><input checked="" type="checkbox"/> Private <input type="checkbox"/> Other (specify) _____ |                        |                                   |                   |                                             |  |
| Operator Information Continued                               | 4.4                                                                                  | <b>Phone Number of Operator</b>                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              | (256) 378-5556                                                                       |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              | 4.5                                                                                  | <b>Operator Address</b>                                                                                                                                                                                                                                     |                        |                                   |                   |                                             |  |
|                                                              | Street or P.O. Box<br>16693 Plant Road                                               |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
|                                                              | City or town<br>Childersburg                                                         |                                                                                                                                                                                                                                                             | State<br>AL            |                                   | ZIP code<br>35044 |                                             |  |
|                                                              | Email address of operator<br>jdennis@usalco.com                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
| <b>SECTION 5. INDIAN LAND (40 CFR 122.21(f)(5))</b>          |                                                                                      |                                                                                                                                                                                                                                                             |                        |                                   |                   |                                             |  |
| Indian Land                                                  | 5.1                                                                                  | Is the facility located on Indian Land?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                                                                                                                              |                        |                                   |                   |                                             |  |

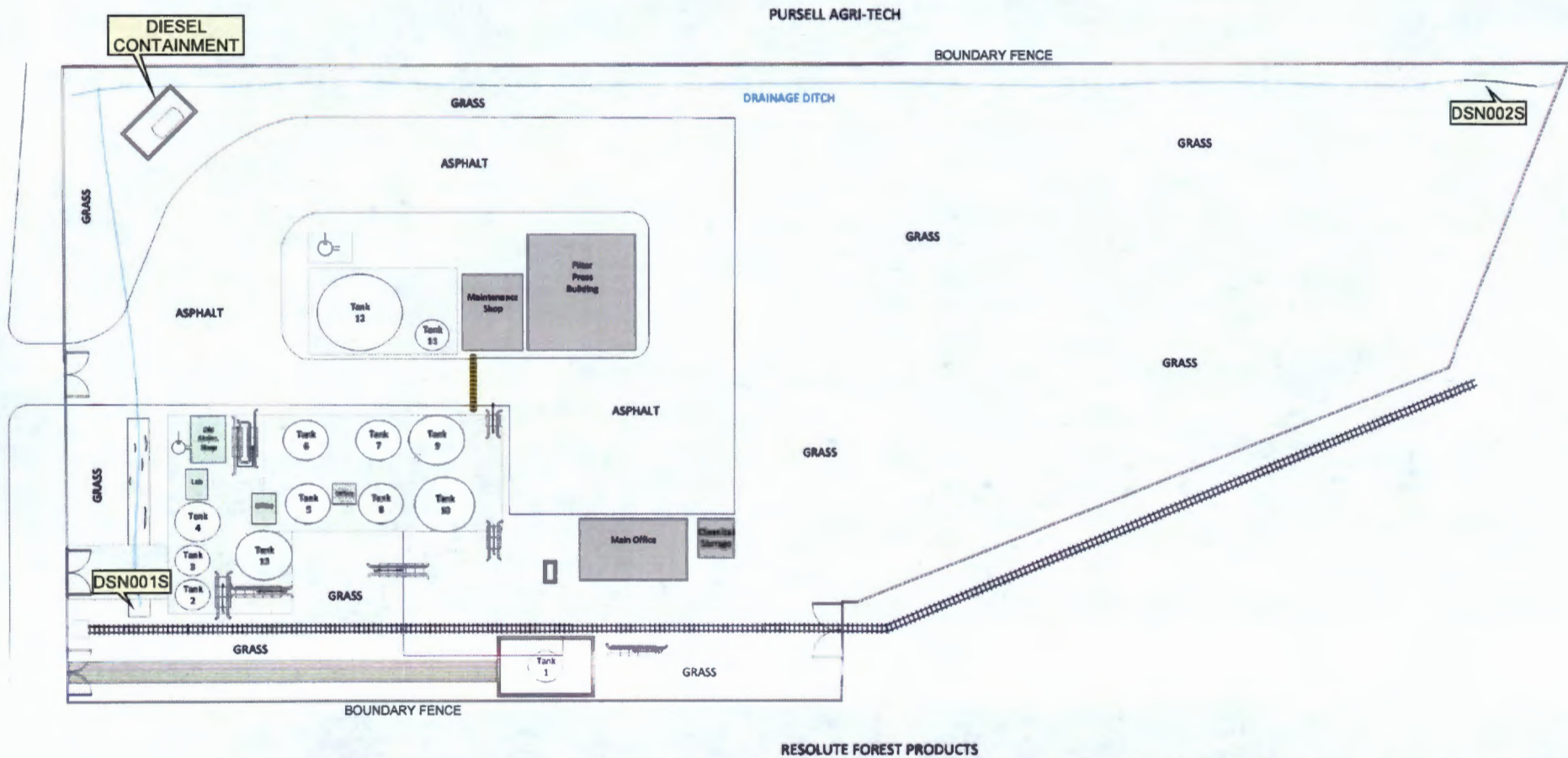
|                                                                         |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                             |
|-------------------------------------------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| EPA Identification Number                                               | NPDES Permit Number<br>AL0077186 | Facility Name<br>G2O Technologies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Form Approved 03/05/19<br>OMB No. 2040-0004                                                 |
| <b>SECTION 6. EXISTING ENVIRONMENTAL PERMITS (40 CFR 122.21(f)(6))</b>  |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                             |
| <b>Existing Environmental Permits</b>                                   | <b>6.1</b>                       | <b>Existing Environmental Permits</b> (check all that apply and print or type the corresponding permit number for each)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                             |
|                                                                         |                                  | <input checked="" type="checkbox"/> NPDES (discharges to surface water)<br>AL0077186                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <input type="checkbox"/> RCRA (hazardous wastes)                                            |
|                                                                         |                                  | <input type="checkbox"/> PSD (air emissions)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/> Nonattainment program (CAA)                                        |
|                                                                         |                                  | <input type="checkbox"/> Ocean dumping (MPRSA)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <input type="checkbox"/> Dredge or fill (CWA Section 404)                                   |
|                                                                         |                                  | <input type="checkbox"/> UIC (underground injection of fluids)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                             |
|                                                                         |                                  | <input type="checkbox"/> NESHAPs (CAA)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                             |
|                                                                         |                                  | <input checked="" type="checkbox"/> Other (specify)<br>61-15 Solid Waste/ALG160129                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                             |
| <b>SECTION 7. MAP (40 CFR 122.21(f)(7))</b>                             |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                             |
| <b>Map</b>                                                              | <b>7.1</b>                       | Have you attached a topographic map containing all required information to this application? (See instructions for specific requirements.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                             |
|                                                                         |                                  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> CAFO—Not Applicable (See requirements in Form 2B.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                             |
| <b>SECTION 8. NATURE OF BUSINESS (40 CFR 122.21(f)(8))</b>              |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                             |
| <b>Nature of Business</b>                                               | <b>8.1</b>                       | Describe the nature of your business.<br>This facility produces liquid aluminum sulfate. The two principle raw materials used are aluminum trihydrate and sulfuric acid. Both raw materials are delivered via bulk railcars and off-loaded to storage tanks inside containment areas. The sulfuric acid is added to water inside a brick lined digester to begin the reaction. The aluminum trihydrate is fed slowly over time to produce the aluminum sulfate. The product is then transferred to a settling tank and then filtered into storage tanks for shipping. The product in the storage is then filtered again into a dedicated truck and sold to municipal water treatment plants and paper mills. |                                                                                             |
| <b>SECTION 9. COOLING WATER INTAKE STRUCTURES (40 CFR 122.21(f)(9))</b> |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                             |
| <b>Cooling Water Intake Structures</b>                                  | <b>9.1</b>                       | Does your facility use cooling water?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                             |
|                                                                         |                                  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 10.1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                             |
|                                                                         | <b>9.2</b>                       | Identify the source of cooling water. (Note that facilities that use a cooling water intake structure as described at 40 CFR 125, Subparts I and J may have additional application requirements at 40 CFR 122.21(r). Consult with your NPDES permitting authority to determine what specific information needs to be submitted and when.)                                                                                                                                                                                                                                                                                                                                                                    |                                                                                             |
| <b>SECTION 10. VARIANCE REQUESTS (40 CFR 122.21(f)(10))</b>             |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                             |
| <b>Variance Requests</b>                                                | <b>10.1</b>                      | Do you intend to request or renew one or more of the variances authorized at 40 CFR 122.21(m)? (Check all that apply. Consult with your NPDES permitting authority to determine what information needs to be submitted and when.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                             |
|                                                                         |                                  | <input type="checkbox"/> Fundamentally different factors (CWA Section 301(n))                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <input type="checkbox"/> Water quality related effluent limitations (CWA Section 302(b)(2)) |
|                                                                         |                                  | <input type="checkbox"/> Non-conventional pollutants (CWA Section 301(c) and (g))                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <input type="checkbox"/> Thermal discharges (CWA Section 316(a))                            |
|                                                                         |                                  | <input checked="" type="checkbox"/> Not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                             |

|                           |                                  |                                   |                                             |
|---------------------------|----------------------------------|-----------------------------------|---------------------------------------------|
| EPA Identification Number | NPDES Permit Number<br>AL0077186 | Facility Name<br>G2O Technologies | Form Approved 03/05/19<br>OMB No. 2040-0004 |
|---------------------------|----------------------------------|-----------------------------------|---------------------------------------------|

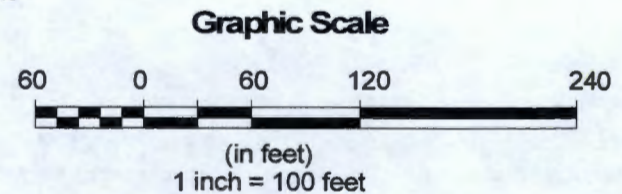
**SECTION 11. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))**

|                                              |                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                           |
|----------------------------------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>Checklist and Certification Statement</b> | 11.1                                                                                             | In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                           |
|                                              |                                                                                                  | <b>Column 1</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Column 2</b>                                                                                           |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 1: Activities Requiring an NPDES Permit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 2: Name, Mailing Address, and Location                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 3: SIC Codes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 4: Operator Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 5: Indian Land                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 6: Existing Environmental Permits                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 7: Map                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input checked="" type="checkbox"/> w/ topographic map <input type="checkbox"/> w/ additional attachments |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 8: Nature of Business                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 9: Cooling Water Intake Structures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 10: Variance Requests                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | <input checked="" type="checkbox"/>                                                              | Section 11: Checklist and Certification Statement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <input type="checkbox"/> w/ attachments                                                                   |
|                                              | 11.2                                                                                             | <b>Certification Statement</b><br><i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i> |                                                                                                           |
|                                              | Name (print or type first and last name)<br>Joseph R. Dennis                                     | Official title<br>Sr. Director, Safety Health Environment & Quality                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                           |
|                                              | Signature<br> | Date signed<br>03/13/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                           |

G2O Technologies, LLC  
Childersburg, Alabama  
SPCC FACILITY MAP



**CEHG**  
Cox Environmental &  
Hydrogeologic, LLC  
205.470.3627



|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        |                                   |                        |                                             |           |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------------|------------------------|---------------------------------------------|-----------|
| EPA Identification Number                                |                                                                                                                                                                                                                                                                                                                   | NPDES Permit Number<br>AL0077186                                                                                                                                                                                                                                                                                                                                                                                                       |                        | Facility Name<br>G2O Technologies |                        | Form Approved 03/05/19<br>OMB No. 2040-0004 |           |
| Form<br>2F<br>NPDES                                      |                                                                                                                                                                                                                                  | <b>U.S Environmental Protection Agency</b><br><b>Application for NPDES Permit to Discharge Wastewater</b><br><b>STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY</b>                                                                                                                                                                                                                                                          |                        |                                   |                        |                                             |           |
| <b>SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1))</b> |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        |                                   |                        |                                             |           |
| Outfall Location                                         | 1.1                                                                                                                                                                                                                                                                                                               | Provide information on each of the facility's outfalls in the table below                                                                                                                                                                                                                                                                                                                                                              |                        |                                   |                        |                                             |           |
|                                                          | Outfall Number                                                                                                                                                                                                                                                                                                    | Receiving Water Name                                                                                                                                                                                                                                                                                                                                                                                                                   | Latitude               |                                   |                        | Longitude                                   |           |
|                                                          | DSN001S                                                                                                                                                                                                                                                                                                           | UNNAMED TRIBUTARY TO<br>COOSA RIVER                                                                                                                                                                                                                                                                                                                                                                                                    | 33°                    | 19'                               | 49" N                  | 86°                                         | 21' 32" W |
|                                                          | DSN002S                                                                                                                                                                                                                                                                                                           | UNNAMED TRIBUTARY TO<br>COOSA RIVER                                                                                                                                                                                                                                                                                                                                                                                                    | 33°                    | 19'                               | 52" N                  | 86°                                         | 21' 21" W |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        | °                      | '                                 | "                      | °                                           | ' "       |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        | °                      | '                                 | "                      | °                                           | ' "       |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        | °                      | '                                 | "                      | °                                           | ' "       |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        | °                      | '                                 | "                      | °                                           | ' "       |
| <b>SECTION 2. IMPROVEMENTS (40 CFR 122.21(g)(6))</b>     |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        |                                   |                        |                                             |           |
| Improvements                                             | 2.1                                                                                                                                                                                                                                                                                                               | Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application?<br><input type="checkbox"/> Yes <span style="margin-left: 150px;"><input checked="" type="checkbox"/> No → SKIP to Section 3.</span> |                        |                                   |                        |                                             |           |
|                                                          | 2.2                                                                                                                                                                                                                                                                                                               | Briefly identify each applicable project in the table below.                                                                                                                                                                                                                                                                                                                                                                           |                        |                                   |                        |                                             |           |
|                                                          | Brief Identification and Description of Project                                                                                                                                                                                                                                                                   | Affected Outfalls<br>(list outfall numbers)                                                                                                                                                                                                                                                                                                                                                                                            | Source(s) of Discharge |                                   | Final Compliance Dates |                                             |           |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        | Required                          | Projected              |                                             |           |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        |                                   |                        |                                             |           |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        |                                   |                        |                                             |           |
|                                                          |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        |                                   |                        |                                             |           |
| 2.3                                                      | Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? (Optional Item)<br><input type="checkbox"/> Yes <span style="margin-left: 150px;"><input type="checkbox"/> No</span> |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                        |                                   |                        |                                             |           |

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| EPA Identification Number | NPDES Permit Number<br>AL0077186 | Facility Name<br>G2O Technologies |
|---------------------------|----------------------------------|-----------------------------------|

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

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

|                         |                                         |                                                                                                                                          |
|-------------------------|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Site<br>Drainage<br>Map | 3.1                                     | Have you attached a site drainage map containing all required information to this application? (See instructions for specific guidance.) |
|                         | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No                                                                                                              |

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

| Pollutant<br>Sources | 4.1                            | Provide information on the facility's pollutant sources in the table below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|----------------------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|---------------|----------------------|--|--|----------------|--------------------------------|--------------------------------|--|-----|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
|                      |                                | Outfall Number                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Impervious Surface Area<br>(within a mile radius of the facility)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Total Surface Area Drained<br>(within a mile radius of the facility) |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                | DSN001S                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1.4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | specify units<br>acres                                               | 1.9           |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                | DSN002S                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 0.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | specify units<br>acres                                               | 3.01          |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | specify units                                                        | specify units |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | specify units                                                        | specify units |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | specify units                                                        | specify units |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | specify units                                                        | specify units |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | specify units                                                        | specify units |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                | 4.2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Provide a narrative description of the facility's significant material in the space below. (See instructions for content requirements.)</p> <p>The plant has bulk storage tanks that come in contact with rainwater. These tanks are located near the western boundary of the facility. The bulk storage tanks contain aluminum sulfate (alum), aluminum trihydrate and sulfuric acid. All tanks have secondary containment and sump pumps. The dumpster and truck loading areas contain berms that funnels runoff into the storage tank secondary containment area. The parking and traffic areas on the western side of the plant is diverted to a stormwater collection basin equipped with sump pumps. Accumulated stormwater is diverted to a drainage ditch that traverses the southern boundary and discharges to DSN002S.</p> |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      | 4.3                            | <p>Provide the location and a description of existing structural and non-structural control measures to reduce pollutants in stormwater runoff. (See instructions for specific guidance.)</p> <table border="1"> <thead> <tr> <th colspan="3">Stormwater Treatment</th> </tr> <tr> <th>Outfall Number</th> <th>Control Measures and Treatment</th> <th>Codes from Exhibit 2F-1 (list)</th> </tr> </thead> <tbody> <tr> <td></td> <td>N/A</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               | Stormwater Treatment |  |  | Outfall Number | Control Measures and Treatment | Codes from Exhibit 2F-1 (list) |  | N/A |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Stormwater Treatment |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Outfall Number       | Control Measures and Treatment | Codes from Exhibit 2F-1 (list)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      | N/A                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|                      |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                      |               |                      |  |  |                |                                |                                |  |     |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

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| EPA Identification Number | NPDES Permit Number<br>AL0077186 | Facility Name<br>G2O Technologies |
|---------------------------|----------------------------------|-----------------------------------|

Form Approved 03/05/19  
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### SECTION 5. NON STORMWATER DISCHARGES (40 CFR 122.26(c)(1)(i)(C))

|                           |     |                                                                                                                                                                                                                                                                                                                                |                                    |                    |                                                      |
|---------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|--------------------|------------------------------------------------------|
| Non-Stormwater Discharges | 5.1 | I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of non-stormwater discharges. Moreover, I certify that the outfalls identified as having non-stormwater discharges are described in either an accompanying NPDES Form 2C, 2D, or 2E application. |                                    |                    |                                                      |
|                           |     | Name (print or type first and last name)                                                                                                                                                                                                                                                                                       |                                    | Official title     |                                                      |
|                           |     | Joseph R. Dennis                                                                                                                                                                                                                                                                                                               |                                    | Plant Manager      |                                                      |
|                           |     | Signature                                                                                                                                                                                                                                                                                                                      |                                    | Date signed        |                                                      |
|                           | 5.2 | Provide the testing information requested in the table below.                                                                                                                                                                                                                                                                  |                                    |                    |                                                      |
|                           |     | Outfall Number                                                                                                                                                                                                                                                                                                                 | Description of Testing Method Used | Date(s) of Testing | Onsite Drainage Points Directly Observed During Test |
|                           |     |                                                                                                                                                                                                                                                                                                                                | N/A                                |                    |                                                      |
|                           |     |                                                                                                                                                                                                                                                                                                                                |                                    |                    |                                                      |
|                           |     |                                                                                                                                                                                                                                                                                                                                |                                    |                    |                                                      |
|                           |     |                                                                                                                                                                                                                                                                                                                                |                                    |                    |                                                      |

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

|                             |     |                                                                                                    |
|-----------------------------|-----|----------------------------------------------------------------------------------------------------|
| Significant Leaks or Spills | 6.1 | Describe any significant leaks or spills of toxic or hazardous pollutants in the last three years. |
|                             |     | N/A                                                                                                |

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

|                       |                                                                                                                                                                                         |                                                                                                                                                                                                      |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Discharge Information | See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table. |                                                                                                                                                                                                      |
|                       | 7.1                                                                                                                                                                                     | Is this a new source or new discharge?                                                                                                                                                               |
|                       |                                                                                                                                                                                         | <input type="checkbox"/> Yes → See instructions regarding submission of <i>estimated</i> data. <input checked="" type="checkbox"/> No → See instructions regarding submission of <i>actual</i> data. |
|                       | Tables A, B, C, and D                                                                                                                                                                   |                                                                                                                                                                                                      |
|                       | 7.2                                                                                                                                                                                     | Have you completed Table A for each outfall?                                                                                                                                                         |
|                       |                                                                                                                                                                                         | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                                                                                                                                  |

| EPA Identification Number       |                                                                                                                                                 | NPDES Permit Number<br>AL0077186                                                                                                                                                                                                                                                                             | Facility Name<br>G2O Technologies | Form Approved 03/05/19<br>OMB No. 2040-0004 |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|---------------------------------------------|
| Discharge Information Continued | 7.3                                                                                                                                             | Is the facility subject to an effluent limitation guideline (ELG) or effluent limitations in an NPDES permit for its process wastewater?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.5.                                                                          |                                   |                                             |
|                                 | 7.4                                                                                                                                             | Have you completed Table B by providing quantitative data for those pollutants that are (1) limited either directly or indirectly in an ELG and/or (2) subject to effluent limitations in an NPDES permit for the facility's process wastewater?<br><input type="checkbox"/> Yes <input type="checkbox"/> No |                                   |                                             |
|                                 | 7.5                                                                                                                                             | Do you know or have reason to believe any pollutants in Exhibit 2F-2 are present in the discharge?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.7.                                                                                                                |                                   |                                             |
|                                 | 7.6                                                                                                                                             | Have you listed all pollutants in Exhibit 2F-2 that you know or have reason to believe are present in the discharge and provided quantitative data or an explanation for those pollutants in Table C?<br><input type="checkbox"/> Yes <input type="checkbox"/> No                                            |                                   |                                             |
|                                 | 7.7                                                                                                                                             | Do you qualify for a small business exemption under the criteria specified in the Instructions?<br><input type="checkbox"/> Yes → SKIP to Item 7.18. <input checked="" type="checkbox"/> No                                                                                                                  |                                   |                                             |
|                                 | 7.8                                                                                                                                             | Do you know or have reason to believe any pollutants in Exhibit 2F-3 are present in the discharge?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.10.                                                                                                               |                                   |                                             |
|                                 | 7.9                                                                                                                                             | Have you listed all pollutants in Exhibit 2F-3 that you know or have reason to believe are present in the discharge in Table C?<br><input type="checkbox"/> Yes <input type="checkbox"/> No                                                                                                                  |                                   |                                             |
|                                 | 7.10                                                                                                                                            | Do you expect any of the pollutants in Exhibit 2F-3 to be discharged in concentrations of 10 ppb or greater?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.12.                                                                                                     |                                   |                                             |
|                                 | 7.11                                                                                                                                            | Have you provided quantitative data in Table C for those pollutants in Exhibit 2F-3 that you expect to be discharged in concentrations of 10 ppb or greater?<br><input type="checkbox"/> Yes <input type="checkbox"/> No                                                                                     |                                   |                                             |
|                                 | 7.12                                                                                                                                            | Do you expect acrolein, acrylonitrile, 2,4-dinitrophenol, or 2-methyl-4,6-dinitrophenol to be discharged in concentrations of 100 ppb or greater?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.14.                                                                |                                   |                                             |
|                                 | 7.13                                                                                                                                            | Have you provided quantitative data in Table C for the pollutants identified in Item 7.12 that you expect to be discharged in concentrations of 100 ppb or greater?<br><input type="checkbox"/> Yes <input type="checkbox"/> No                                                                              |                                   |                                             |
|                                 | 7.14                                                                                                                                            | Have you provided quantitative data or an explanation in Table C for pollutants you expect to be present in the discharge at concentrations less than 10 ppb (or less than 100 ppb for the pollutants identified in Item 7.12)?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No       |                                   |                                             |
|                                 | 7.15                                                                                                                                            | Do you know or have reason to believe any pollutants in Exhibit 2F-4 are present in the discharge?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.17.                                                                                                               |                                   |                                             |
|                                 | 7.16                                                                                                                                            | Have you listed pollutants in Exhibit 2F-4 that you know or believe to be present in the discharge and provided an explanation in Table C?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                                                                                            |                                   |                                             |
| 7.17                            | Have you provided information for the storm event(s) sampled in Table D?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |                                                                                                                                                                                                                                                                                                              |                                   |                                             |

|                           |                                  |                                   |                                             |
|---------------------------|----------------------------------|-----------------------------------|---------------------------------------------|
| EPA Identification Number | NPDES Permit Number<br>AL0077186 | Facility Name<br>G2O Technologies | Form Approved 03/05/19<br>OMB No. 2040-0004 |
|---------------------------|----------------------------------|-----------------------------------|---------------------------------------------|

|                                        |                                    |                                                                                                                                                                                                                                                                                           |  |  |                    |    |    |    |    |    |    |    |
|----------------------------------------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--------------------|----|----|----|----|----|----|----|
| <b>Discharge Information Continued</b> | <b>Used or Manufactured Toxics</b> |                                                                                                                                                                                                                                                                                           |  |  |                    |    |    |    |    |    |    |    |
|                                        | 7.18                               | Is any pollutant listed on Exhibits 2F-2 through 2F-4 a substance or a component of a substance used or manufactured as an intermediate or final product or byproduct?                                                                                                                    |  |  |                    |    |    |    |    |    |    |    |
|                                        |                                    | <input checked="" type="checkbox"/> Yes <span style="margin-left: 150px;"><input type="checkbox"/> No → SKIP to Section 8.</span>                                                                                                                                                         |  |  |                    |    |    |    |    |    |    |    |
|                                        | 7.19                               | List the pollutants below, including TCDD if applicable.                                                                                                                                                                                                                                  |  |  |                    |    |    |    |    |    |    |    |
|                                        |                                    | <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">1. Aluminum, total</td> <td style="width: 33%;">4.</td> <td style="width: 33%;">7.</td> </tr> <tr> <td>2.</td> <td>5.</td> <td>8.</td> </tr> <tr> <td>3.</td> <td>6.</td> <td>9.</td> </tr> </table> |  |  | 1. Aluminum, total | 4. | 7. | 2. | 5. | 8. | 3. | 6. |
| 1. Aluminum, total                     | 4.                                 | 7.                                                                                                                                                                                                                                                                                        |  |  |                    |    |    |    |    |    |    |    |
| 2.                                     | 5.                                 | 8.                                                                                                                                                                                                                                                                                        |  |  |                    |    |    |    |    |    |    |    |
| 3.                                     | 6.                                 | 9.                                                                                                                                                                                                                                                                                        |  |  |                    |    |    |    |    |    |    |    |

|                                                                           |     |                                                                                                                                                                                                                                  |                    |                                                          |
|---------------------------------------------------------------------------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|----------------------------------------------------------|
| <b>SECTION 8. BIOLOGICAL TOXICITY TESTING DATA (40 CFR 122.21(g)(11))</b> |     |                                                                                                                                                                                                                                  |                    |                                                          |
| <b>Biological Toxicity Testing Data</b>                                   | 8.1 | Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last three years? |                    |                                                          |
|                                                                           |     | <input type="checkbox"/> Yes <span style="margin-left: 150px;"><input checked="" type="checkbox"/> No → SKIP to Section 9.</span>                                                                                                |                    |                                                          |
|                                                                           | 8.2 | Identify the tests and their purposes below.                                                                                                                                                                                     |                    |                                                          |
|                                                                           |     | Test(s)                                                                                                                                                                                                                          | Purpose of Test(s) | Submitted to NPDES Permitting Authority?                 |
|                                                                           |     |                                                                                                                                                                                                                                  |                    | <input type="checkbox"/> Yes <input type="checkbox"/> No |
|                                                                           |     |                                                                                                                                                                                                                                  |                    | <input type="checkbox"/> Yes <input type="checkbox"/> No |

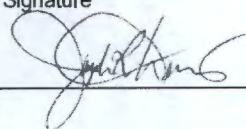
|                                                                        |                         |                                                                                                                                    |                                               |                     |
|------------------------------------------------------------------------|-------------------------|------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|---------------------|
| <b>SECTION 9. CONTRACT ANALYSIS INFORMATION (40 CFR 122.21(g)(12))</b> |                         |                                                                                                                                    |                                               |                     |
| <b>Contract Analysis Information</b>                                   | 9.1                     | Were any of the analyses reported in Section 7 (on Tables A through C) performed by a contract laboratory or consulting firm?      |                                               |                     |
|                                                                        |                         | <input checked="" type="checkbox"/> Yes <span style="margin-left: 150px;"><input type="checkbox"/> No → SKIP to Section 10.</span> |                                               |                     |
|                                                                        | 9.2                     | Provide information for each contract laboratory or consulting firm below.                                                         |                                               |                     |
|                                                                        |                         | Laboratory Number 1                                                                                                                | Laboratory Number 2                           | Laboratory Number 3 |
|                                                                        | Name of laboratory/firm | Cox Environmental & Hydrogeologic, LLC (CEHG)                                                                                      | Sutherland Environmental Company, Inc.        |                     |
|                                                                        | Laboratory address      | 2129 Brook Highland Ridge<br>Birmingham, AL 35242                                                                                  | 2515 5th Avenue South<br>Birmingham, AL 35233 |                     |
|                                                                        | Phone number            | (205) 470-3627                                                                                                                     | (205) 581-9500                                |                     |

|                       |          |                                                                                  |  |
|-----------------------|----------|----------------------------------------------------------------------------------|--|
| Pollutant(s) analyzed | Flow, pH | TSS, Ammonia, Phosphorus, Total Aluminum, BOD, COD, Oil & Grease, Total Nitrogen |  |
|-----------------------|----------|----------------------------------------------------------------------------------|--|

|                           |                                  |                                   |                                             |
|---------------------------|----------------------------------|-----------------------------------|---------------------------------------------|
| EPA Identification Number | NPDES Permit Number<br>AL0077186 | Facility Name<br>G2O Technologies | Form Approved 03/05/19<br>OMB No. 2040-0004 |
|---------------------------|----------------------------------|-----------------------------------|---------------------------------------------|

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

|                                       |                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Checklist and Certification Statement | 10.1                                                                                             | In Column 1 below, mark the sections of Form 2F that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                               |
|                                       |                                                                                                  | Column 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Column 2                                                                                                                                                                                                                                                                                                                      |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/ attachments (e.g., responses for additional outfalls)                                                                                                                                                                                                                                             |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/ attachments                                                                                                                                                                                                                                                                                       |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input checked="" type="checkbox"/> w/ site drainage map                                                                                                                                                                                                                                                                      |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/ attachments                                                                                                                                                                                                                                                                                       |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/ attachments                                                                                                                                                                                                                                                                                       |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/ attachments                                                                                                                                                                                                                                                                                       |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input checked="" type="checkbox"/> Table A <input type="checkbox"/> w/ small business exemption request<br><input checked="" type="checkbox"/> Table B <input checked="" type="checkbox"/> w/ analytical results as an attachment<br><input checked="" type="checkbox"/> Table C <input checked="" type="checkbox"/> Table D |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/attachments                                                                                                                                                                                                                                                                                        |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> w/attachments (e.g., responses for additional contact laboratories or firms)                                                                                                                                                                                                                         |
|                                       |                                                                                                  | <input checked="" type="checkbox"/> Section 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <input type="checkbox"/>                                                                                                                                                                                                                                                                                                      |
|                                       | 10.2                                                                                             | <b>Certification Statement</b><br><i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i> |                                                                                                                                                                                                                                                                                                                               |
|                                       | Name (print or type first and last name)<br>Joseph R. Dennis                                     | Official title<br>Sr. Director, Safety Health Environment & Quality                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                               |
|                                       | Signature<br> | Date signed<br>03/13/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                               |

|                           |                                  |                                   |                           |
|---------------------------|----------------------------------|-----------------------------------|---------------------------|
| EPA Identification Number | NPDES Permit Number<br>AL0077186 | Facility Name<br>G2O Technologies | Outfall Number<br>DSN001S |
|---------------------------|----------------------------------|-----------------------------------|---------------------------|

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

**TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETERS (40 CFR 122.26(c)(1)(i)(E)(3))<sup>1</sup>**

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

| Pollutant or Parameter |                                               | Maximum Daily Discharge<br>(specify units)      |                            | Average Daily Discharge<br>(specify units)      |                            | Number of Storm<br>Events Sampled | Source of<br>Information<br>(new source/new<br>dischargers only; use<br>codes in instructions) |
|------------------------|-----------------------------------------------|-------------------------------------------------|----------------------------|-------------------------------------------------|----------------------------|-----------------------------------|------------------------------------------------------------------------------------------------|
|                        |                                               | Grab Sample Taken<br>During First<br>30 Minutes | Flow-Weighted<br>Composite | Grab Sample Taken<br>During First<br>30 Minutes | Flow-Weighted<br>Composite |                                   |                                                                                                |
| 1.                     | Oil and grease                                | 3                                               |                            |                                                 |                            | 1                                 | Facility Grounds                                                                               |
| 2.                     | Biochemical oxygen demand (BOD <sub>5</sub> ) | 4                                               | mg/L                       |                                                 |                            | 1                                 | Facility Grounds                                                                               |
| 3.                     | Chemical oxygen demand (COD)                  | 26                                              | mg/L                       |                                                 |                            | 1                                 | Facility Grounds                                                                               |
| 4.                     | Total suspended solids (TSS)                  | 112                                             | mg/L                       |                                                 |                            | 1                                 | Facility Grounds                                                                               |
| 5.                     | Total phosphorus                              | 0.16                                            | mg/L                       |                                                 |                            | 1                                 | Facility Grounds                                                                               |
| 6.                     | Total Kjeldahl nitrogen (TKN)                 | -                                               | -                          |                                                 |                            | -                                 | Facility Grounds                                                                               |
| 7.                     | Total nitrogen (as N)                         | 158                                             | mg/L                       |                                                 |                            | 1                                 | Facility Grounds                                                                               |
| 8.                     | pH (minimum)                                  | 7.34                                            |                            |                                                 |                            | 1                                 | Facility Grounds                                                                               |
|                        | pH (maximum)                                  | 7.38                                            |                            |                                                 |                            | 1                                 | Facility Grounds                                                                               |

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

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|                           |                                  |                                   |                           |
|---------------------------|----------------------------------|-----------------------------------|---------------------------|
| EPA Identification Number | NPDES Permit Number<br>AL0077186 | Facility name<br>G2O Technologies | Outfall Number<br>DSN0015 |
|---------------------------|----------------------------------|-----------------------------------|---------------------------|

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

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

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

| Date of Storm Event | Duration of Storm Event<br>(in hours) | Total Rainfall During<br>Storm Event<br>(in inches) | Number of Hours Between<br>Beginning of Storm Measured and<br>End of Previous Measurable Rain<br>Event | Maximum Flow Rate<br>During Rain Event<br>(in gpm or specify units) | Total Flow from Rain Event<br>(in gallons or specify units) |
|---------------------|---------------------------------------|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|-------------------------------------------------------------|
| 12/11/2025          | 3 hours                               | 0.1 inches                                          | 66                                                                                                     | 1 gpm                                                               | 180 gals.                                                   |

Provide a description of the method of flow measurement or estimate.  
Standard methods and EPA 600

## Holt, Wayne A

---

**From:** Joseph Dennis <jdennis@usalco.com>  
**Sent:** Wednesday, June 3, 2026 11:27 AM  
**To:** Holt, Wayne A  
**Subject:** AEPACS - NPDES Permit Expiration Notification - AL0077186 v4.0, G2O Technologies, LLC - Coosa Pines  
**Attachments:** 56124 NPDES.pdf

Mr. Holt,

Per our conversation, attached is the TKN data that was requested. We have already paid the permit fee so please let me know if there is anything else needed to complete the application.

### Joseph Dennis

SR. DIRECTOR OF SAFETY, HEALTH, ENVIRONMENT & QUALITY  
O: 410.354.0100 x2311 M: 256.510.4813



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# Sutherland

Environmental Company, Inc.

2515 5th Avenue South  
Birmingham, AL 35233  
205-581-9500



|            |                           |              |              |
|------------|---------------------------|--------------|--------------|
| Client:    | CEHG                      | Report Date: | June 1, 2026 |
| Attention: | Mr. Michael Cox           | Reference #  | 56124        |
| Address:   | 2129 Brook Highland Ridge | P.O. #       | verbal       |
|            | Birmingham, AL 35242      | Project ID:  | NPDES        |

|                       |                |                   |                                 |
|-----------------------|----------------|-------------------|---------------------------------|
| Sample Matrix:        | water          | Sample Collector: | M. Cox                          |
| Date Received:        | 5/26/26        | Method Reference: | Hach, Standard Methods & EPA600 |
| Date /Time Collected: | 5/26/26 @ 1505 | Field ID:         | DSN001                          |
|                       |                | Lab ID:           | 275782                          |

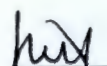
| Parameter                | Result | Units | Date / Time Assay | Analyst | Method     | D.L.  |
|--------------------------|--------|-------|-------------------|---------|------------|-------|
| pH                       | 8.38   | SU    | 5/27/26 1117      | HA      | SM4500-H+  | na    |
| TSS                      | 4      | mg/L  | 5/28/26 1106      | HA/LM   | SM 2540D   | 1     |
| Ammonia                  | 21.1   | mg/L  | 5/27/26 1120      | HA      | H TNT832   | 0.10  |
| Phosphorus, Total        | 0.47   | mg/L  | 5/27/26 1135      | HA      | SM4500-P E | 0.05  |
| Aluminum, Total Rec.     | 0.120  | mg/L  | 5/28/26 1416      | MJH     | E 200.8    | 0.010 |
| BOD-5                    | 42     | mg/L  | 6/1/26 0959       | CRR/LM  | SM 5210B   | 1     |
| Oil & Grease             | 3      | mg/L  | 5/28/26 1523      | CRR     | E 1664B    | 1     |
| COD                      | 71     | mg/L  | 5/28/26 1215      | LM/HA   | SM 5220D   | 1     |
| Nitrogen, Total          | 256    | mg/L  | 5/28/26 1333      | LM/HA   | H 10208    | 0.10  |
| Kjeldahl Nitrogen, Total | 177.4  | mg/L  | 5/28/26 1507      | HA      | H 10242    | 0.10  |

|                       |                |                   |                                 |
|-----------------------|----------------|-------------------|---------------------------------|
| Sample Matrix:        | water          | Sample Collector: | M. Cox                          |
| Date Received:        | 5/26/26        | Method Reference: | Hach, Standard Methods & EPA600 |
| Date /Time Collected: | 5/26/26 @ 1520 | Field ID:         | DSN002                          |
|                       |                | Lab ID:           | 275783                          |

| Parameter                | Result | Units | Date / Time Assay | Analyst | Method     | D.L.  |
|--------------------------|--------|-------|-------------------|---------|------------|-------|
| pH                       | 8.03   | SU    | 5/27/26 1118      | HA      | SM4500-H+  | na    |
| TSS                      | 10     | mg/L  | 5/28/26 1106      | HA/LM   | SM 2540D   | 1     |
| Ammonia                  | 6.48   | mg/L  | 5/27/26 1120      | HA      | H TNT832   | 0.10  |
| Phosphorus, Total        | BDL    | mg/L  | 5/27/26 1135      | HA      | SM4500-P E | 0.05  |
| Aluminum, Total Rec.     | 0.156  | mg/L  | 5/28/26 1417      | MJH     | E 200.8    | 0.010 |
| BOD-5                    | 2      | mg/L  | 6/1/26 0959       | CRR/LM  | SM 5210B   | 1     |
| Oil & Grease             | 4      | mg/L  | 5/28/26 1526      | CRR     | E 1664B    | 1     |
| COD                      | 18     | mg/L  | 5/28/26 1215      | LM/HA   | SM 5220D   | 1     |
| Nitrogen, Total          | 49     | mg/L  | 5/28/26 1333      | LM/HA   | H 10208    | 0.10  |
| Kjeldahl Nitrogen, Total | 29.2   | mg/L  | 5/28/26 1507      | HA      | H 10242    | 0.10  |

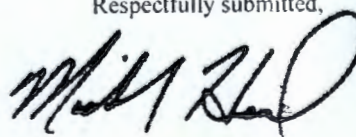
COD Start Date/Time: 5/28/26 @ 1015  
BOD Start Date/Time: 5/27/26 @ 1525

BDL = Below Detection Limit  
DL = Detection Limit , Method

 / QAQC

EPA Laboratory ID AL01084

Respectfully submitted,



Michael Heard  
VP/Laboratory Manager

Quality Environmental Analytical Services



## Sutherland Environmental Read and Review Checklist

|                                                                                                                         |                                                                                                                                                                                                                                                                         |                                                                                        |                                                                                      |                                         |
|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------------|
| 1. Is the client and the sample collector(s) accurately noted on report?                                                | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| 2. Do all dates match the COC on the report?                                                                            | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| 3. Is the purchase order ID (PO) and project ID accurately noted on report?                                             | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| 4. Are all methods and method references correct on report?                                                             | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| 5. Do the Field ID(s) and the Lab ID(s) correspond to the COC?                                                          | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| 6. Is the report formatted correctly?                                                                                   | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| 7. Does the following information on report correspond to the printout information from the analytical instrumentation: |                                                                                                                                                                                                                                                                         |                                                                                        |                                                                                      |                                         |
| Sample Matrix                                                                                                           | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| Analyst                                                                                                                 | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| Analysis Date/Time                                                                                                      | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| Analyte concentration                                                                                                   | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| Units                                                                                                                   | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| Dilution Factors/Conversions                                                                                            | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| Detection/Reporting/Quant. Limits                                                                                       | <input type="checkbox"/> NO                                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> YES                                                | <input type="checkbox"/> NO                                                          | <input checked="" type="checkbox"/> YES |
| QC Reviewed:                                                                                                            |                                                                                                                                                                                                                                                                         | <input checked="" type="checkbox"/> YES                                                |                                                                                      | <input checked="" type="checkbox"/> YES |
| Initial*:                                                                                                               | <div style="border-bottom: 1px solid black; width: 100px; margin: 0 auto;">MJH</div>                                                                                                                                                                                    |                                                                                        | <div style="border-bottom: 1px solid black; width: 100px; margin: 0 auto;">LKH</div> |                                         |
| * MJH = Michael Heard, MSH = Matt Hageman, KH = Kelly Hester                                                            |                                                                                                                                                                                                                                                                         |                                                                                        |                                                                                      |                                         |
| PDF /<br>Notes:                                                                                                         | <div style="border-bottom: 1px solid black; height: 20px; margin-bottom: 5px;">M. COX</div> <div style="border-bottom: 1px solid black; height: 20px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 20px; margin-bottom: 5px;"></div> |                                                                                        |                                                                                      |                                         |
|                                                                                                                         | Invoice                                                                                                                                                                                                                                                                 | <div style="border-bottom: 1px solid black; height: 20px; margin: 0 auto;">56124</div> |                                                                                      |                                         |
|                                                                                                                         | Sutherland Environmental Co., Inc.                                                                                                                                                                                                                                      |                                                                                        |                                                                                      |                                         |

**Sutherland Environmental Company Inc.**

**Sample Check-in Form**

|                                        |                               |
|----------------------------------------|-------------------------------|
| <b>Date Received:</b> <u>5/26/26</u>   | <b>Invoice #</b> <u>56124</u> |
| <b>Method of Delivery:</b> <u>hand</u> | <b>Client:</b> <u>CEHG</u>    |

|                                                                                      |                                         |                                        |                                        |
|--------------------------------------------------------------------------------------|-----------------------------------------|----------------------------------------|----------------------------------------|
| 1. Did any containers arrive broken? .....                                           | YES                                     | <input checked="" type="checkbox"/> NO |                                        |
| * If so, please state field ID with analysis of broken sample(s) _____               |                                         |                                        |                                        |
| 2. Were cooler(s) sealed upon arrival? .....                                         | <input checked="" type="checkbox"/> YES | NO                                     | NA                                     |
| 3. Were the samples received at the proper temperature (4°C +/- 2°C)? ....           | <input checked="" type="checkbox"/> YES | NO                                     | NA                                     |
| 4. Did a chain of custody accompany the samples? .....                               | <input checked="" type="checkbox"/> YES | NO                                     |                                        |
| * Was it properly filled out? .....                                                  | <input checked="" type="checkbox"/> YES | NO                                     |                                        |
| 5. Were correct containers used for the analysis requested? .....                    | <input checked="" type="checkbox"/> YES | NO                                     |                                        |
| 6. Were all containers properly preserved? .....                                     | <input checked="" type="checkbox"/> YES | NO                                     | NA                                     |
| 7. Were all water samples received at the proper pH? .....                           | <input checked="" type="checkbox"/> YES | NO                                     | NA                                     |
| 8. If VOA vials were present, was there any head space? .....                        | YES                                     | NO                                     | <input checked="" type="checkbox"/> NA |
| * If so, please state field ID of deficient sample(s): _____                         |                                         |                                        |                                        |
| 9. Were all containers properly labeled and match chain of custody? .....            | <input checked="" type="checkbox"/> YES | NO                                     |                                        |
| 10. Did containers arrive within holding time of analysis? .....                     | <input checked="" type="checkbox"/> YES | NO                                     |                                        |
| * If not, please state field ID and analysis of sample(s) out of holding time: _____ |                                         |                                        |                                        |
| 11. Was client informed of any/all deficiencies in sample check-in? .....            | YES                                     | NO                                     | <input checked="" type="checkbox"/> NA |
| 12. Were any samples rejected? .....                                                 | YES                                     | <input checked="" type="checkbox"/> NO |                                        |
| * If so, please state field ID of rejected sample(s): _____                          |                                         |                                        |                                        |

Sample Custodian (signed):

M. W.

**SPILL PREVENTION CONTROL AND  
COUNTERMEASURE (SPCC) PLAN  
TO COMPLY WITH  
40 CFR 112.7 AND 112.8 LAST AMENDED DECEMBER 7, 2012**

**FOR**

**G2O TECHNOLOGIES, LLC  
16693 PLANT ROAD  
CHILDERSBURG, ALABAMA 35044**

**Prepared by**



**PROJECT NO. 202001121**

**May 3, 2021**

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## **CERTIFICATION STATEMENT**

I have reviewed the Spill Prevention Control and Countermeasure (SPCC) Plan for G2O Technologies, LLC, 16693 Plant Road, Childersburg, Alabama. The facility has been examined and being familiar with the provisions of Title 40 - Protection of the Environment, Chapter 1 - Environmental Protection Agency, Subchapter D, - Water Programs, Part 112 - Oil Pollution Prevention, as first published in 38 FR 34165, December 11, 1973 and last amended in 71 FR 77266, December 26, 2006, I certify that:

1. I am familiar with the requirements of 40 CFR Part 112.
2. I or my agent have visited and examined the facility.
3. This plan has been prepared in accordance with good engineering practices, including considerations of applicable industry standards, and with the requirements of this part.
4. The procedures for requiring inspection and testing have been established.
5. The plan is adequate for this facility.



---

**Clyde H. Cox, P.E.**

**11658 AL**  
**Registration No. and State**

## MANAGEMENT APPROVAL & REVIEW – [112.5 & 112.7(d)(2)]

### MANAGEMENT APPROVAL

G2O Technologies, LLC is committed to the prevention of discharges of oil to navigable waters or the environment, and maintains the highest standards for spill prevention control and countermeasure through periodic review, updating, and implementation of this Spill Prevention Control and Countermeasure (SPCC) Plan. G2O Technologies, LLC will provide the manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

James Chatman

Authorized Facility Representative

Signature

Plant Manager

Title

### MANAGEMENT REVIEW

A review and evaluation of this SPCC Plan is conducted at least once every five (5) years. As a result of this review and evaluation, G2O Technologies, LLC will amend the SPCC Plan within six (6) months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review.

This SPCC Plan will also be amended within six (6) months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer.

| <u>Review Dates</u> | <u>Signature</u> | <u>Amendment Required?</u><br><u>(Y/N)</u> |
|---------------------|------------------|--------------------------------------------|
| _____               | _____            | _____                                      |
| _____               | _____            | _____                                      |
| _____               | _____            | _____                                      |

## **FACILITY INFORMATION**

NAME OF FACILITY: G2O Technologies, LLC

LOCATION OF FACILITY:

|             |                                    |
|-------------|------------------------------------|
| Address     | <u>16693 Plant Road</u>            |
| City, State | <u>Childersburg, Alabama 34044</u> |
| County      | <u>Talladega</u>                   |

TYPE OF FACILITY: Manufacturing of Aluminum Sulfate (ALUM) for industrial and sanitary wastewater treatment applications.

DATE OF INITIAL FACILITY OPERATION: February 1967

FACILITY OWNER:

|             |                                    |
|-------------|------------------------------------|
| Name        | <u>G2O Technologies, LLC</u>       |
| Address     | <u>16693 Plant Road</u>            |
| City, State | <u>Childersburg, Alabama 34044</u> |

FACILITY MANAGER: James Chatman

DESIGNATED PERSON(S) ACCOUNTABLE FOR OIL AND/OR SPILL PREVENTION AT FACILITY:

|                 |                                     |
|-----------------|-------------------------------------|
| Name and Title: | <u>James Chatman, Plant Manager</u> |
| Name and Title: | <u>Rickie Price, Lead Operator</u>  |

### RELEASE REPORTING FORM

|                                                                                |                                    |                  |  |
|--------------------------------------------------------------------------------|------------------------------------|------------------|--|
| INCIDENT DATE:                                                                 |                                    | AND TIME:        |  |
| REPORT DATE:                                                                   |                                    | AND TIME:        |  |
| FACILITY NAME:                                                                 | <b>G2O Technologies, LLC</b>       |                  |  |
| ADDRESS:                                                                       | <b>16693 Plant Road</b>            |                  |  |
|                                                                                | <b>Childersburg, Alabama 34044</b> |                  |  |
| TELEPHONE NUMBER:                                                              | <b>256-378-5556</b>                |                  |  |
| <b>MANAGER AT SCENE:</b>                                                       |                                    |                  |  |
|                                                                                |                                    | <b>PHONE</b>     |  |
| TYPE MATERIAL DISCHARGED:                                                      |                                    |                  |  |
| APPROXIMATE GALLONS:                                                           |                                    |                  |  |
| DATE STOPPED:                                                                  |                                    | AND TIME:        |  |
| SOURCE OF DISCHARGE:                                                           |                                    |                  |  |
| DESCRIPTION OF AFFECTED MEDIA:                                                 |                                    |                  |  |
| CAUSE OF DISCHARGE:                                                            |                                    |                  |  |
| DAMAGE OR INJURIES AS RESULT OF DISCHARGE:                                     |                                    |                  |  |
| ACTIONS BEING USED TO STOP, REMOVE AND MITIGATE THE EFFECTS OF DISCHARGE:      |                                    |                  |  |
| WAS /IS EVACUATION NEEDED:                                                     |                                    |                  |  |
| ANY PART OF THE SPILL ENTERING DRAINAGE OR SANITARY SEWERS, PIPES, OR DITCHES? |                                    | Yes/ No          |  |
| WAS SPILL CONTAINED ON MERCURY AIR CENTER PROPERTY?                            |                                    | Yes/ No          |  |
| WAS SPILL CONTAINED ON AN ASPHALT OR CONCRETE PAVEMENT AREA?                   |                                    | Yes/ No          |  |
| <b>NAMES OF INDIVIDUALS AND ORGANIZATIONS WHO HAVE BEEN CONTACTED:</b>         |                                    |                  |  |
|                                                                                |                                    |                  |  |
|                                                                                |                                    |                  |  |
| <b>CONTRACTOR/AGENCY</b>                                                       | <b>REPRESENTATIVE</b>              | <b>TELEPHONE</b> |  |
|                                                                                |                                    |                  |  |

## CONTACT LIST AND TELEPHONE NUMBERS

|                                                                                    |                     |               |                                         |
|------------------------------------------------------------------------------------|---------------------|---------------|-----------------------------------------|
| FACILITY RESPONSE COORDINATOR:                                                     |                     | James Chatman |                                         |
| Business Phone                                                                     | Day, 256-378-5556   | Cell Phone    | 256-267-3963                            |
|                                                                                    | Night, 256-510-4813 |               |                                         |
| ALTERNATE FACILITY RESPONSE COORDINATOR:                                           |                     | Rickie Price  |                                         |
| Business Phone                                                                     | 256-378-5556        | Cell Phone    | 256-267-4651                            |
| FIRE DEPARTMENT                                                                    |                     |               |                                         |
| (request ambulance, if needed)                                                     | 911                 | OR            | 256-378-7062                            |
| STATE TROOPER OFFICE                                                               |                     |               |                                         |
| (request ambulance, if needed)                                                     | 911                 | OR            | 205-322-4691                            |
| ALABAMA DEPARTMENT OF ENVIRONMENTAL<br>MANAGEMENT (ADEM),<br>EMERGENCY OIL SPILL # |                     |               | 334-271-7700<br>800-843-0699            |
| TALLADEGA COUNTY EMERGENCY MANAGEMENT<br>AGENCY (EMA)                              |                     |               | 256-761-2125                            |
| NATIONAL RESPONSE CENTER (NRC)                                                     |                     |               | 1-800-424-8802                          |
| ENVIRONMENTAL PROTECTION AGENCY,<br>REGION IV – ATLANTA                            |                     |               | 404-562-8357                            |
| REGIONAL ENVIRONMENTAL COORDINATOR<br>Joe Dennis Director of EHS                   |                     |               | Day, 256-378-5556<br>Cell, 256-510-4813 |
| EMERGENCY RESPONSE CONTRACTORS                                                     |                     |               |                                         |
| Cox Environmental & HyrdroGeologic                                                 |                     |               | 205-470-3627                            |
| US Ecology                                                                         |                     |               | 800-899-4672                            |
| Action Environmental                                                               |                     |               | 877-708-7703                            |
| ENVIRONMENTAL ENGINEERING FIRM NAME:                                               |                     |               |                                         |
| Cox Environmental & HyrdroGeologic<br>Birmingham, AL                               |                     |               | 205-470-3627                            |

## **1.0 Introduction**

The facility described in this plan is under the primary responsibility of G2O Technologies, LLC, Childersburg, Alabama. All questions relating to this Spill Prevention Control and Countermeasure (SPCC) Plan or facility contained therein should be directed to the G2O Technologies, LLC office as indicated.

### **1.1 Facility Operations**

G2O Technologies, LLC is located at 16693 Plant Road, Childersburg, Alabama. G2O Technologies, LLC manufactures Aluminum Sulfate (ALUM) for industrial and sanitary wastewater treatment applications. G2O Technologies, LLC normally operates approximately 20 hours per day and 5 days per week.

An Area (Site) Vicinity Map with the G2O Technologies, LLC facility and surrounding areas is included in this SPCC Plan as Figure 1.

### **1.2 SPCC Plan Amendment**

G2O Technologies, LLC will amend the SPCC when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge. The changes that may require an amendment include:

- Adding or removing a storage tank from operation
- Changes to secondary containment structures
- Changes in oil products
- Movement of containers within facility

The plan amendment must be prepared within six (6) months of the change and implemented as soon as possible, but not later than six (6) months after preparation of the amendment. The SPCC Plan must be reviewed at least once every five (5) years and re-certified by a licensed professional engineer (P.E.). Non-technical amendments do not require a P.E. certification; i.e., change of facility, contact name, address, etc. (40 CFR, Part 112.5).

***It should be noted that the bauxite raw material has been replaced with aluminum trihydrate. As a result, there is no need to run the press and dispose of material at the landfill. Material is still stored in the silos. The silos are located inside of containment structures such that there is no potential for discharge.***

## **2.0 § 112.7 General Requirements for Spill Prevention Control and Countermeasure Plan**

G2O Technologies, LLC is the owner and operator of a facility subject to 40 CFR § 112 because over 1,320 cumulative gallons of petroleum products are stored in aboveground containers over 55-gallons capacity. This SPCC Plan has been prepared in accordance with good engineering practices. The SPCC Plan has the full approval of management at a level of authority to commit the necessary resources to fully implement the plan. This SPCC Plan has been prepared in the sequence specified in 40 CFR 112.7 and 112.8.

### **2.1 §112.7(a) Conformance with 40 CFR 112**

#### **2.1.1 §112.7(a)(1) Conformance Discussion**

This SPCC Plan has been prepared with consideration of each requirement listed in 40 CFR §112.7 and §112.8. Any deviation from these requirements are noted and discussed within the body of this plan.

#### **2.1.2 §112.7(a)(2) Compliance with 40 CFR §112.7 and §112.8**

G2O Technologies, LLC's SPCC Plan complies with all applicable requirements listed in 40 CFR §112.7 and §112.8 of the regulations.

#### **2.1.3 §112.7(a)(3) Physical Layout and Facility Diagram**

The physical layouts and facility diagrams are shown as Figure 2, Site Map. These diagrams mark the location and contents of each container. Contents of each container

are shown in Table 1, Maximum Storage Capacity/Release Potential of Aboveground Chemical and Petroleum Product Storage. There are no completely buried tanks at the facility that are otherwise exempt from the requirements of §112.1(d)(4). There are no transfer stations and connecting pipes to be shown on the facility diagrams.

#### 2.1.3.1 §112.7(a)(3)(i) Type Oil and Storage Capacity

The type oil and chemical in each container and storage capacity are shown in Table 1, Maximum Storage Capacity/Release Potential of Aboveground Chemical and Petroleum Product Storage.

#### 2.1.3.2 §112.7(a)(3)(ii) Discharge Prevention Measures

G2O Technologies, LLC employees are trained to implement spill prevention practices for work with and around petroleum product sources. G2O Technologies, LLC personnel shall use common sense and rely on spill prevention practices at all times to minimize the potential for a release of petroleum products. For example, the following “common sense” practices are recommended:

- keep container lids securely fastened at all times;
- do not leave portable sources unattended (outside);
- return portable sources to their storage location after use;
- use pads, drip pans, and funnels when transferring petroleum products from a portable container;
- protect petroleum product sources from damage by moving equipment;
- keep dike valves closed at all times, except when discharging clean storm water from the diked area;

- contaminated water within the diked area shall be removed and disposed of by a licensed waste contractor;
- do not store oil sources near catch basins or floor drains; and
- loading and unloading of petroleum products shall be attended at all times.

Spill prevention during petroleum product deliveries (offloading) is the primary responsibility of the supplier until the product is safely in the tank or vessel. Filling of portable tanks and facility equipment is the responsibility of facility personnel. G2O Technologies, LLC implements spill prevention measures for loading, vehicle filling and truck unloading operations.

The Facility Manager or designee will supervise deliveries for all new suppliers and will periodically observe deliveries for existing, approved suppliers. Delivery observations include:

- vehicle inspection prior to delivery and departure (e.g., to make sure the driver does not drive away with the hose in the fill pipe);
- inquiry to ensure the truck contains the right product for the tank;
- assurance that the tank can hold what the supplier intends to deliver; and
- adequate spill response equipment is on board the vehicle.

Loading operations will be performed by vendor personnel trained in the specific operation. The operators will:

- check that the vehicle is properly secured before making connections;
- inspect the storage and delivery system, hoses, connections and the receiving vessel before beginning operations;
- monitor the transfer operation in-person from beginning to end;
- check that the vehicle has been disconnected before departure; and
- secure the storage and delivery system after use.

The procedures for the safe handling of containers which include 55-gallon drums that will reduce the risk of spills are shown in Appendix B, Container Management Program.

#### 2.1.3.3 §112.7(a)(3)(iii) Discharge or Drainage Controls

##### 2.1.3.3.1 Building Interior

Materials stored within the maintenance building are located within concrete walls or curbing to provide containment. Absorbent materials are available to block spills from leaving the building through doorways.

##### 2.1.3.3.2 Building Exterior

As shown in Table 1, there is one 1,000 diesel AST located on the west side of the facility. This is a single-walled tank with secondary containment that has a capacity greater than 110% of the tank. The containment area has a manual release valve.

#### 2.1.3.4 §112.7(a)(3)(iv) Countermeasures for Discharge, Discovery, Response and Cleanup

This section describes the cleanup response and protocol to follow in the event of an oil spill. The uncontrolled discharge of petroleum products to groundwater, surface water or soil is prohibited by State and Federal laws. It is imperative that action be taken to respond to a spill once it has occurred. Depending on the volume and characteristics of the materials spills, G2O Technologies, LLC has defined spill response as either a "Minor Spill Response" or "Major Spill Response" ("Spill Emergency"). A list of Emergency Contacts is shown on Page viii.

#### 2.1.3.4.1 Minor Spill Response

A "Minor Spill Response" is defined as one that poses no significant harm to human health or the environment. These spills involve generally less than (<) five (5) gallons and can usually be cleaned up by G2O Technologies, LLC personnel. Other characteristics of a minor spill include the following:

- the spilled material is easily stopped or controlled at the time of the spill;
- the spill is localized;
- the spilled material is not likely to reach surface water or groundwater;
- there is little danger to human health; and
- there is little danger of fire or explosion.

In the event of a minor spill, the following guidelines shall apply:

- Identify and remove all possible ignition sources.
- Stop the source if the spill is ongoing.
- Immediately notify the Primary/Alternate Facility Response Coordinator.
- Under the direction of the Primary/Alternate Facility Response Coordinator, contain the spill with spill response materials and equipment.

- Place spill debris in properly labeled waste containers.
- Complete the Release Reporting Form (see Page vii).

#### 2.1.3.4.2 Major Spill Response (Spill Emergency)

A “Spill Emergency” is defined as one involving a spill that cannot be safely controlled or cleaned up. Characteristics include the following:

- the spill is large enough to spread beyond the immediate spill area;
- the spilled material enters surface water or groundwater (regardless of spill size);
- the spill requires special training and equipment to cleanup;
- the spilled material is dangerous to human health; and/or
- there is a danger of fire or explosion.

In the event of a spill emergency, the following guidelines shall apply:

- Identify and remove all ignition sources.
- Stop the source if the spill is ongoing only if safe to do so.
- All workers shall immediately evacuate the spill site and move to a safe distance away from the spill.
- A Primary/Alternate Facility Response Coordinator shall call for medical assistance if workers are injured (no worker shall engage in rescue operations unless they have been properly trained and equipped).
- The Primary/Alternate Facility Response Coordinator will locate the Spill Catch Points and deploy absorbent boom and other absorbent materials as necessary.
- A Primary/Alternate Facility Response Coordinator shall immediately contact the Alabama Department of Environmental Management (ADEM) (205-942-6168), the local Fire Department (911) or (256-378-7861), and the National Response Center (1-800-424-8802). Document the telephone calls on the Release Reporting Form (see Page vii).

- The Primary/Alternate Facility Response Coordinator will coordinate cleanup and seek assistance from a cleanup contractor as necessary.

If a Primary/Alternate Facility Response Coordinator is not available at the time of the spill, then the next highest G2O Technologies, LLC employee in command shall assume responsibility.

#### 2.1.3.5 §112.7(a)(3)(v) Disposal of Recovered Materials

Wastes resulting from a minor spill response will be containerized in impervious bags, drums or buckets. The waste will be removed from the site by a licensed waste hauler within two (2) weeks.

Wastes resulting from a major spill response will be removed and disposed by a cleanup contractor.

#### 2.1.3.6 §112.7(a)(3)(vi) Contact List and Telephone Numbers

In the event of a minor spill, the Primary/Alternate Facility Response Coordinator shall complete a written Release Reporting Form (see Page vii). This form details the time, material, and quantity of oil released.

If a major spill occurs at the G2O Technologies, LLC facility, the Primary/Alternate Facility Response Coordinator shall, in addition to the notification procedures above, provide written information to the EPA Regional Administrator as required by the SPCC Plan

rules. A copy of this information must be provided to the Alabama Department of Environmental Management (ADEM).

The Release Reporting Form includes a checklist to document the proper notification of state and federal agencies. The form shall be filed and maintained as long as G2O Technologies, LLC owns and/or operates this facility.

The Contact List and Telephone Numbers that are to be notified in case of a spill are shown on Page viii.

#### 2.1.4 §112.7(a)(4) Reporting a Spill

Any discharge of petroleum products upon the ground or surface waters of the United States in quantities sufficient to cause or have the potential to cause environmental damage must be reported by the Primary/Alternate Facility Response Coordinator to those listed on Page viii, Contact List and Telephone Numbers. The information that must be reported is as follows:

1. Exact address and telephone number of the facility.
2. The date and time of the discharge.
3. The type of material discharged.
4. Estimates of the total quantity discharged.
5. The source of the discharge.
6. A description of the affected media.
7. The cause of the discharge.
8. Any damage or injuries caused by the discharge.
9. Actions being used to stop, remove and mitigate the effects of the discharge.
10. Whether an evacuation may be needed.
11. Names of individuals and organizations who have been contacted.

40 CFR §110.3 defines a discharge of oil in such quantities as may be harmful as (a) violating applicable water quality standards or (b) causing a film or sheen or discoloration of the surface of water or adjoining shorelines or cause a sludge emulsion to be deposited beneath the surface of the water or adjoining shorelines.

#### 2.1.5 §112.7(a)(5) Spill Response Plan

An petroleum product spill contingency plan for G2O Technologies, LLC as shown in Section 2.1.3.4, is in general conformance to 40 CFR 109.5 with modifications for a small facility.

A list of names and telephone numbers is included on Page viii and can be posted in a conspicuous place in the facility for use in the event of a spill.

Copies of a Release Reporting Form (see Page vii), are maintained at the facility for use in notification of a spill.

Spill response training is provided each year to supervisors and oil-handling personnel. The Fire Department and/or the Emergency Response Contractor will be contacted and required to take action steps requiring efforts beyond the capabilities of G2O Technologies, LLC

#### 2.2 §112.7(b) Fault Analysis

Table 1 is a listing of locations where there is a reasonable potential for equipment failure which can result in a discharge of petroleum products to the soil or surface water of the United States.

### 2.3 §112.7(c) Containment

Secondary containment is provided for the locations for a potential equipment failure as shown in Table 1. These containment systems including walls and floors are capable of containing petroleum products and are constructed so that any discharge from a primary containment system will not escape the secondary containment system before cleanup occurs.

### 2.4 §112.7(d) Contingency Planning

A Spill Response Plan is discussed in Section 2.1.5. The Management Approval statement signed by the Plant Manager shown on Page v is a written commitment of the manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharge that may be harmful.

### 2.5 §112.7(e) Inspections, Test and Records

The record of the inspections will be signed by the appropriate supervisor or inspector and will be kept with the SPCC Plan for a period of five (5) years.

### 2.5.1 Inspection Procedures

Inspection Procedures are shown in Appendix A, Inspection Forms.

## 2.6 §112.7(f) Personnel, Training and Discharge Prevention Procedure

### 2.6.1 §112.7(f)(1) Training

G2O Technologies, LLC shall provide SPCC training for personnel involved with handling petroleum products. The Plant Manager shall arrange for annual training, which shall include the following training topics:

- an introduction to pollution control laws;
- rules and regulations pertaining to the use and storage of petroleum products;
- inspection, operation and maintenance of spill equipment, and petroleum product storage and dispensing equipment;
- spill response and cleanup;
- spill catch points;
- spill notification and record keeping; and
- spill prevention practices.

Records of attendance at training and topics covered shall be maintained by the Plant Manager.

The annual SPCC training shall be documented to include the instructor's name, course outline, date and duration of training, attendant's names and signatures, and corrective action list for areas in need of improvement, if any. This information shall be filed and

maintained for at least three (3) years at the office of the Plant Manager. A Certificate of Training shall be presented to each G2O Technologies, LLC employee that has completed the training. The Plant Manager shall forward a copy of this certificate to the Human Resources Department for inclusion in the employee's file.

#### 2.6.2 §112.7(f)(2) Designated Employee

The Plant Manager is designated as the person who is accountable for discharge prevention and who reports to facility management and is responsible for training of oil-handling personnel.

#### 2.6.3 §112.7(f)(3) Employee Briefings

At least once a year, oil-handling personnel are briefed to assure adequate understanding of the SPCC Plan for this facility. These briefings highlight and describe known discharges or failures, malfunctioning components and any recently developed precautionary measures.

### 2.7 §112.7(g) Security

#### 2.7.1 §112.7(g)(1) Fence

The G2O Technologies, LLC facility is fully fenced. Visitors are required to be escorted by a G2O Technologies, LLC employee at all times.

#### 2.7.2 §112.7(g)(2) Closed Valves

There are no valves, which permit direct outward flow of the tanks contents that are required to be locked in a closed position when in non-operating or “stand-by” status.

#### 2.7.3 §112.7(g)(3) Lock Starter Control

There are no pump control switches that are to be kept in the off or closed position unless fuel transfer operations are being conducted.

#### 2.7.4 §112.7(g)(4) Security Cap

All oil loading/unloading connections are securely capped or blank flanged when not in service or when in “stand-by” service for an extended time.

#### 2.7.5 §112.7(g)(5) Lighting

##### 2.7.5.1 §112.7(g)(5)(i) Discharge Discovery

Lighting is adequate to discover discharges occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.).

##### 2.7.5.2 §112.7(g)(5)(ii) Prevent Vandalism

Lighting is sufficient to reduce the risk of discharges occurring through acts of vandalism.

## 2.8 §112.7(h) Loading

When oil products are delivered, G2O Technologies, LLC employees and contractors must follow the minimum requirements for loading and unloading of combustible materials outlined by the Department of Transportation (40 CFR 177.834). This includes the following as a minimum:

- No smoking while transferring;
- The vehicle hand brake is set or the wheels chocked to prevent departure before the transfer is complete;
- All vehicles or containers involved in loading or unloading shall be grounded prior to transferring;
- Any nearby unprotected storm drains will be closed or covered to prevent accidental spills of fuel from entering the storm system if unloading/unloading does not occur in a contained area;
- A qualified person will be attend loading/unloading operations at all times during the transfer;
- The qualified person must verify that that receiving tank has sufficient volume to prevent an overfill; and
- After transfer is complete, all valves and other closures on the fuel truck are closed and free of leaks prior to departure.

## 2.9 §112.7(i) Brittle Fracture

If any petroleum product tank undergoes a repair alteration, reconstruction or a change in service that might effect the risk of a discharge or failure due to brittle fractures or other catastrophe or has discharged oil or failed due to fracture failure or other catastrophe, the container will be evaluated for risk of discharge or failure due to brittle fracture or other catastrophe, and if necessary appropriate action taken for repair or tank abandonment.

2.10 §112.7(i) State Regulations

The State of Alabama accepts the requirements of 40 CFR §112 as adequate for state requirements for spill prevention control and countermeasure.

### **3.0 § 112.8 Spill Prevention Control and Countermeasure Plan Requirements for On-shore Facilities (Excluding Production Facilities)**

#### **3.1 § 112.8(a) Meet Requirements of § 112.7**

This plan meets the general requirements for the plan listed under § 112.7 and the specific discharge prevention and containment procedures contained in this section.

#### **3.2 § 112.8(b) Facility Drainage**

The 1,000 gallon diesel AST has secondary containment greater than 110% of the tanks capacity. The containment is provided by a 16' 6" by 33' 9" by 4' concrete block structure. Flow from the containment area is controlled by a manual valve. Drainage would be to the south and west to the outfall point.

##### **3.2.1 § 112.8(b)(1) Drainage Discharge**

The 1,000 gallon diesel AST has secondary containment greater than 110% of the tanks capacity. The containment is provided by a 16' 6" by 33' 9" by 4' concrete block structure. Flow from the containment area is controlled by a manual valve. Only authorized personnel who are trained on the details of this SPCC Plan will perform dike drainage.

##### **3.2.2 § 112.8(b)(2) Drainage Valves and Stormwater Discharge**

The 1,000 gallon diesel AST has secondary containment greater than 110% of the tanks capacity. The containment is provided by a 16' 6" by 33' 9" by 4' concrete block structure. Flow from the containment area is controlled by a manual valve. Only authorized personnel who are trained on the details of this SPCC Plan will perform dike drainage.

3.2.3 § 112.8(b)(3) Drainage System Design

NOT APPLICABLE

3.2.4 § 112.8(b)(4) Final Discharge

NOT APPLICABLE

3.2.5 § 112.8(b)(5) Equipment Failure

NOT APPLICABLE

3.3 § 112.8(c) Bulk Storage Containers

3.3.1 § 112.8(c)(1) Compatible Materials

The petroleum product storage tanks are constructed of materials that are compatible with the materials stored and conditions of storage.

3.3.2 § 112.8(c)(2) Containment Design

The 1,000 gallon diesel AST has secondary containment greater than 110% of the tanks capacity. The containment is provided by a 16' 6" by 33' 9" by 4' concrete block structure. Flow from the containment area is controlled by a manual valve.

### 3.3.3 § 112.8(c)(3) Rainwater Discharge

Since the bulk storage tanks are double-walled steel tanks, there is no uncontaminated rainwater that needs to be drained from containment areas.

#### 3.3.3.1 § 112.8(c)(3)(i) Bypass Valves

There are no containment areas that require bypass valves.

#### 3.3.3.2 § 112.8(c)(3)(ii) Inspect Discharge

All rainwater collected in the containment area will be inspected for evidence of petroleum contamination before release.

#### 3.3.3.3 § 112.8(c)(3)(iii) Responsible Supervisor

Only authorized personnel who are trained on the details of this SPCC Plan will perform dike drainage.

#### 3.3.3.4 § 112.8(c)(3)(iv) Discharge Records

There are no records of discharges that are to be completed and kept on file.

### 3.3.4 § 112.8(c)(4) Buried Metal Storage Tanks

There are no buried metal storage tanks at G2O Technologies, LLC Plants 1 or 2.

### 3.3.5 § 112.8(c)(5) Corrosion Protection for Partially Buried or Bunker Metal Storage Tanks

There are no partially buried or bunkered metallic tanks for the storage of petroleum

products at G2O Technologies, LLC which require corrosion protection.

### 3.3.6 § 112.8(c)(6) Test Aboveground Storage Tanks

Inspection and testing of aboveground storage tanks (ASTs) at G2O Technologies, LLC shall be conducted in accordance with SP001-Standard for Inspection of Aboveground Storage Tanks, Steel Tank Institute, issued July 2005, Third Edition. Periodic aboveground storage tank inspections are to be conducted by owner's inspector. Checklists for periodic aboveground storage tank inspections are found in Appendix A, Inspection Forms. These checklists are to be used as a guide for recording minimum data requirements. In addition,

- G2O Technologies, LLC's inspector must be knowledgeable of storage facility operations, the type of aboveground storage tank and its associated components, and characteristics of the liquids stored.
- G2O Technologies, LLC's inspector must review prior inspection, repair and alteration data before each inspection. Special conditions are to be noted for a particular aboveground storage tank.
- G2O Technologies, LLC's inspector is to complete the STI SP001 AST Record for each AST as designated in the checklist. Special conditions and changes or alterations to the tank are to be noted.
- G2O Technologies, LLC's inspector is to complete the STI SP001 Quarterly Inspection Checklist each quarter. Any special conditions are to be noted.
- G2O Technologies, LLC's inspector is to complete the STI SP001 Annual Inspection Checklist each year. Any special conditions are to be noted.

In addition, all storage tanks greater than 5,000 gallons and less than 30,000 gallons must have a formal external inspection every 20 years by a Certified Inspector as required by

Table 5.5, Table of Inspection Schedules, from the SPI SP001-Standard for the Inspection of Aboveground Storage Tanks issued July 2005, Third Edition.

Each aboveground container is inspected for integrity whenever repairs are made. Records of such inspections are kept with the SPCC Plan. Should any deterioration in the tank floor or wall be detected, a company specializing in tank inspection and repair will be employed to assess and repair damage.

#### 3.3.7 § 112.8(c)(7) Internal Coil Leakage

There are no bulk storage tanks which utilize internal heating coils at the facility.

#### 3.3.8 § 112.8(c)(8) Container Engineering

##### 3.3.8.1 § 112.8(c)(8)(i) Alarm

There are no systems using audible signal alarms at the facility.

##### 3.3.8.2 § 112.8(c)(8)(ii) Pump Cut-Off

There are no systems using a pump cut-off at the facility.

##### 3.3.8.3 § 112.8(c)(8)(iii) Audible or Code Signal

There are no systems using audible signals at the facility.

3.3.8.4 § 112.8(c)(8)(iv) Fast Response System

G2O Technologies, LLC personnel frequently monitor bulk storage containers to prevent the overfilling of containers.

3.3.8.5 § 112.8(c)(8)(v) Test Sensors

There are no sensors onsite that would require testing.

3.3.8.6 § 112.8(c)(9) Observe Treatment Systems

There are no direct discharge effluent treatment facilities at this location; however, drainage ditches and stormwater discharge are inspected at regular intervals.

3.3.9 § 112.8(c)(10) Correct Visible Discharge

All visible discharges which are the result of loss of oil from a container, including but not limited to seams, gaskets, piping, pumps, valves, rivets and bolts, will be properly corrected. Accumulation of oil in the containment area will be promptly removed.

3.3.10 § 112.8(c)(11) Mobile Discharge Storage Containers

There are no mobile containers at the G2O Technologies, LLC facility.

3.4 § 112.8(d) Facility Transfer Operations, Pumping and Facility Process

3.4.1 § 112.8(d)(1) Buried Piping

There are no buried pipes at the facility which would require protective wrapping and

coating or cathodic protection.

#### 3.4.2 § 112.8(d)(2) Cap or Blank Flange

All terminal connections at the transfer point are capped when not in service or in “stand-by” service for an extended period of time.

#### 3.4.3 § 112.8(d)(3) Pipe Supports

Pipe supports should be properly designed to minimize abrasion and corrosion and allow for expansion and contraction.

#### 3.4.4 § 112.8(d)(4) Inspect Aboveground Valves, Piping and Appurtenances

On a quarterly basis, all aboveground valves, piping and appurtenances are expected to access the general conditions of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipe line supports, locking of valves and metal services. There are no buried piping that would require integrity and leak testing at time of installation, modification, construction, relocation or replacement.

#### 3.4.5 § 112.8(d)(5) Aboveground Piping Warning

There are no aboveground piping and other petroleum products transfer operations that can be endangered by vehicles entering the facility.

**TABLE 1**

**MAXIMUM STORAGE CAPACITY/RELEASE POTENTIAL OF  
ABOVEGROUND CHEMICAL AND PETROLEUM PRODUCT STORAGE**

**TABLE 1**

| <b>MAXIMUM STORAGE CAPACITY/RELEASE POTENTIAL OF ABOVEGROUND CHEMICAL AND PETROLEUM PRODUCT STORAGE</b> |                      |                                        |                                                                                    |                           |                                                            |                                               |
|---------------------------------------------------------------------------------------------------------|----------------------|----------------------------------------|------------------------------------------------------------------------------------|---------------------------|------------------------------------------------------------|-----------------------------------------------|
| <b>FIGURE/I.D. POINT</b>                                                                                | <b>NAME/LOCATION</b> | <b>NUMBER/<br/>GALLON<br/>CAPACITY</b> | <b>PRODUCT</b>                                                                     | <b>HI-LEVEL<br/>ALARM</b> | <b>ESTIMATED<br/>SPILL/<br/>DIRECTION/RATE<sup>1</sup></b> | <b>CONTAINMENT/SPILL<br/>CONTROL FEATURES</b> |
|                                                                                                         | Diesel Fuel Tank     | 1/1,000                                | Diesel Fuel                                                                        | None                      | 1,000/South and West/15 minutes                            | Secondary Containment Greater than 110%       |
|                                                                                                         | Maintenance Shop     | 20 Gallons                             | Miscellaneous Petroleum Product                                                    | None                      | Inside Building                                            | Concrete Block Walls and Concrete Pad         |
|                                                                                                         | Maintenance Shop     | 10/55                                  | Hydraulic and Lubricating Oils, Brake Cleaner, Mineral Spirits, Transmission Fluid | None                      | Inside Building                                            | NA                                            |

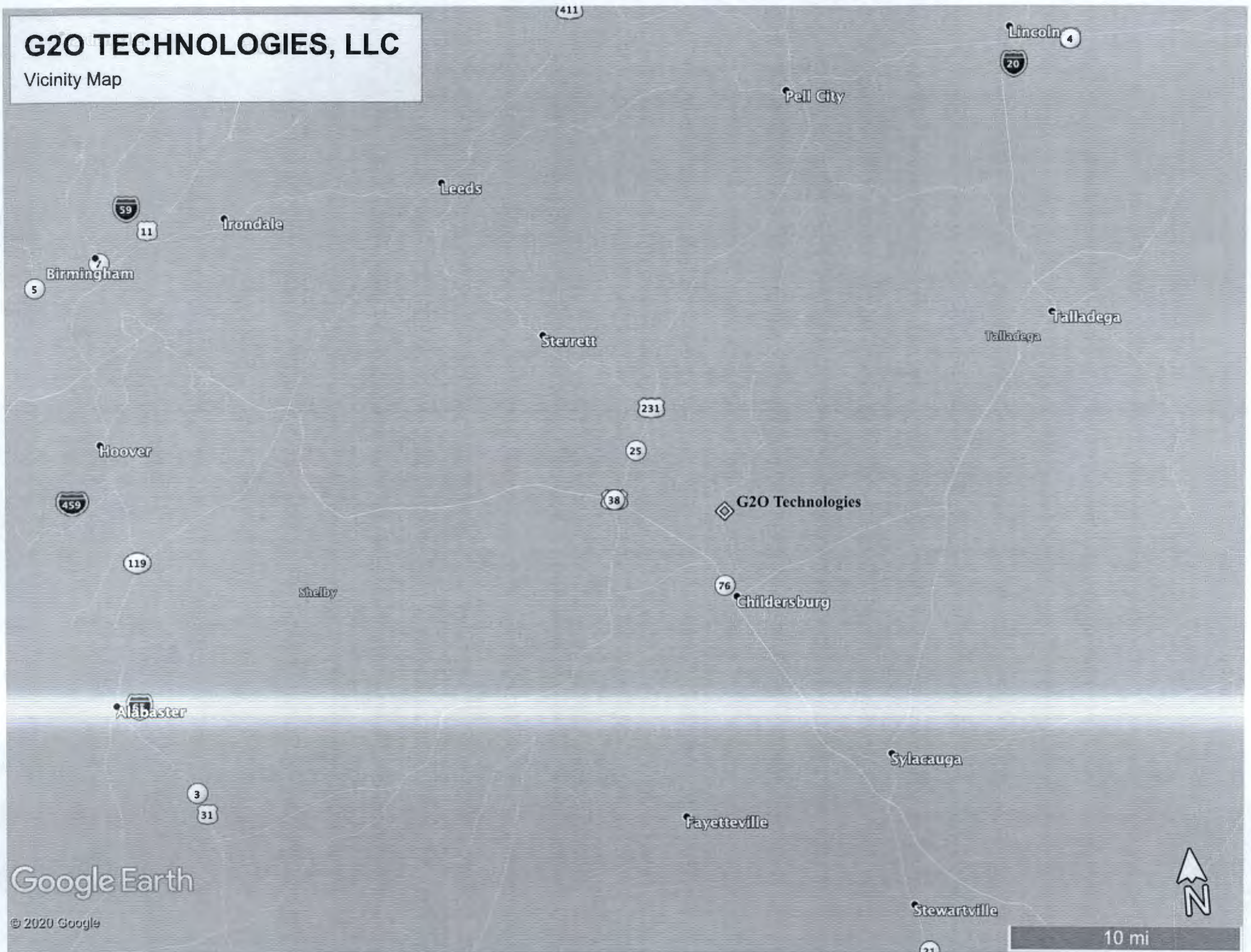
NOTE 1: DRUM OIL STORAGE QUANTITIES ARE APPROXIMATE AND MAY VARY.

NOTE 2: QUANTITY OF OIL PRODUCTS AND RATE OF FLOW IS ASSUMED TO BE WORST-CASE SCENARIO, AND CONSIDERED CATASTROPHIC FAILURE OF THE ENTIRE CONTAINER.

**FIGURE 1**  
**AREA (SITE) VICINITY MAP**

# G2O TECHNOLOGIES, LLC

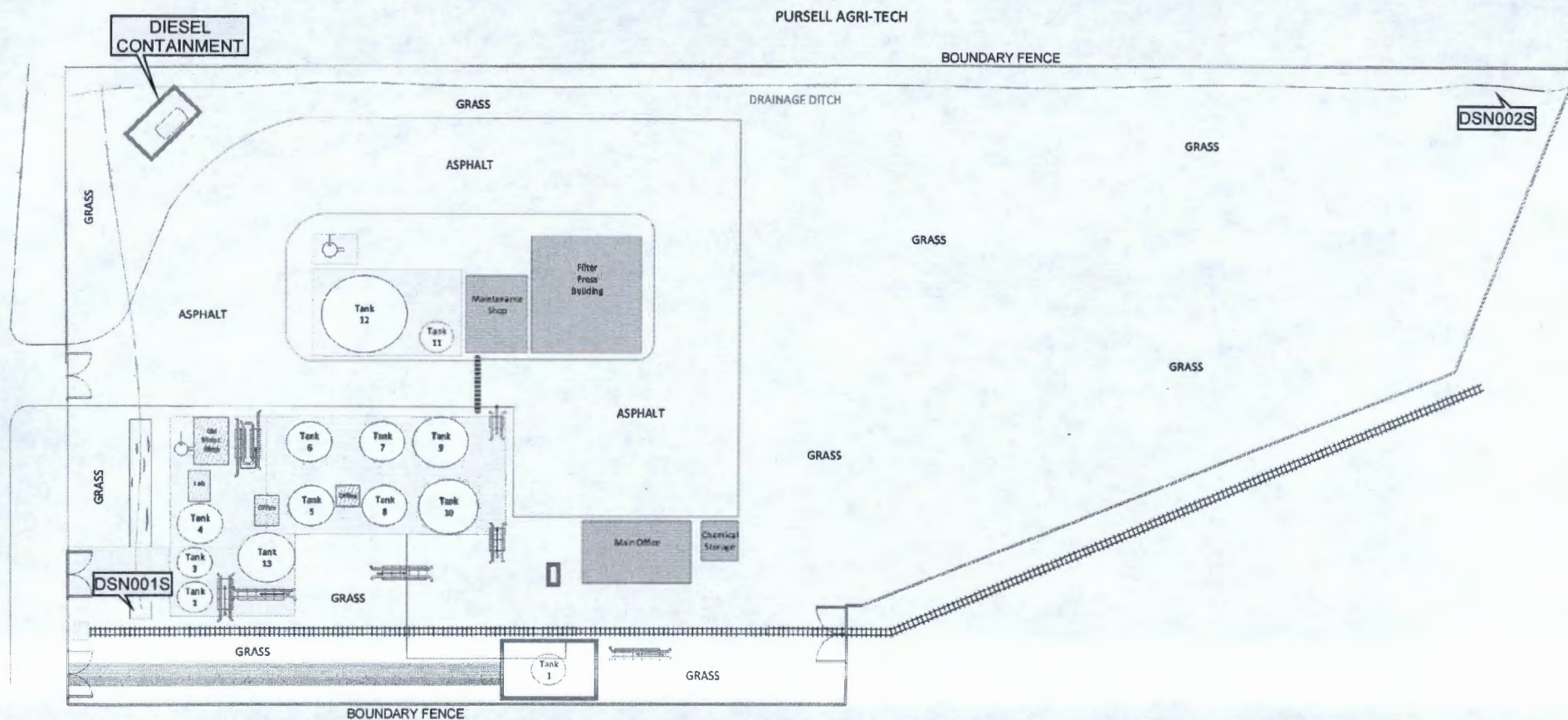
Vicinity Map



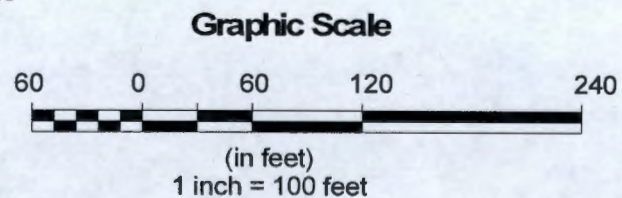
**FIGURE 2**

**SITE MAP**

# G2O Technologies, LLC Childersburg, Alabama SPCC FACILITY MAP



**CEHG**  
Cox Environmental &  
Hydrogeologic, LLC  
205.470.3627



**FIGURE 3**  
**DIGITAL ORTHOGRAPHIC MAP**  
**(AERIAL PHOTO)**

# G2O TECHNOLOGIES, LLC

Aerial Photograph of Plant Facility



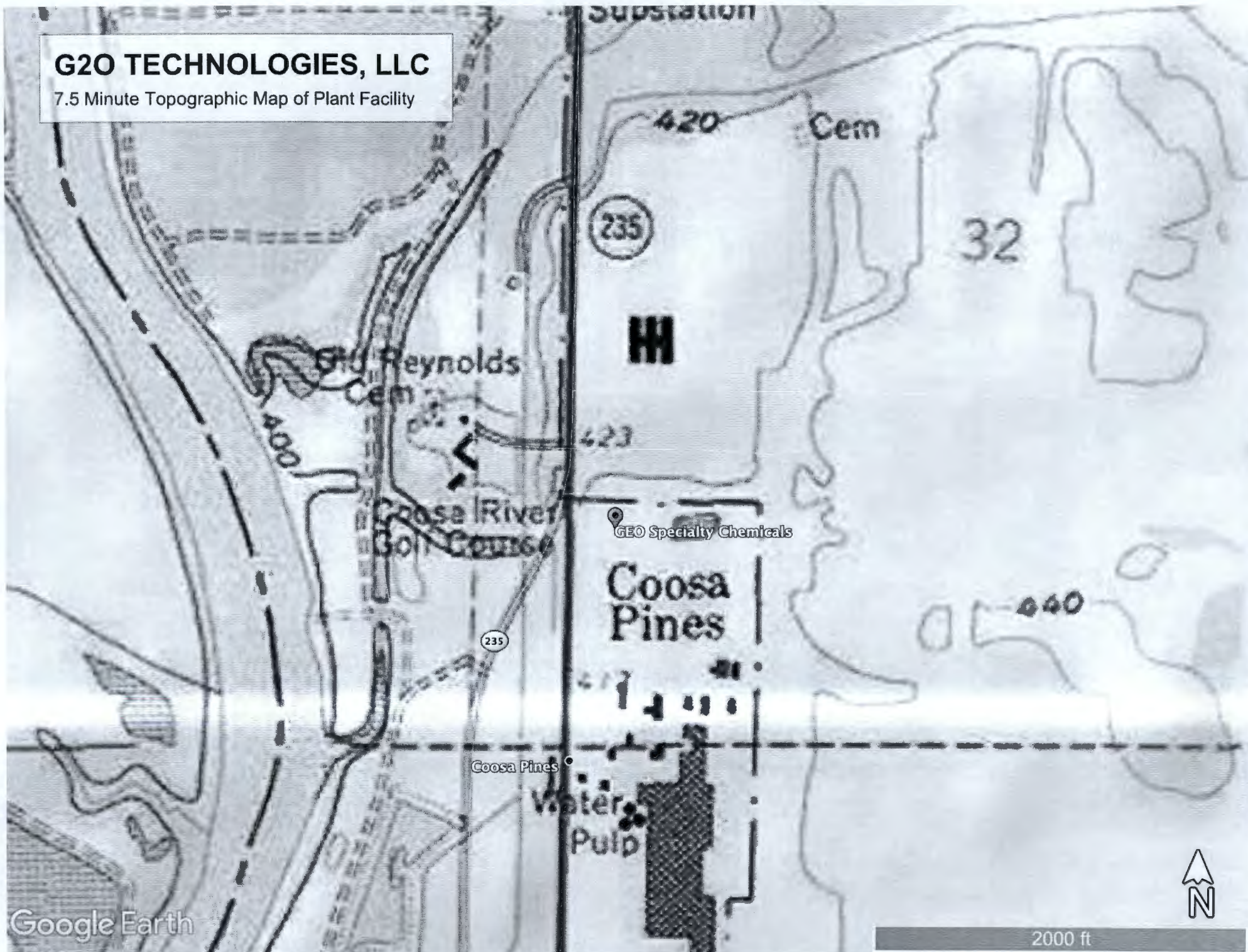
**FIGURE 4**  
**TALLADEGA COUNTY TAX MAP**



**FIGURE 5**  
**7.5 MINUTE TOPOGRAPHIC MAP**

# G2O TECHNOLOGIES, LLC

7.5 Minute Topographic Map of Plant Facility



**APPENDIX A**  
**INSPECTION FORMS**

**Monthly Spill Cart Inspection Form**  
**G2O Technologies, LLC**  
**Childersburg, Alabama**

[illegible]

**Quarterly Tank Inspection Form**  
**G2O Technologies, LLC**  
**Childersburg, Alabama**

[illegible]

**APPENDIX B**  
**CONTAINER MANAGEMENT PROGRAM**

**G2O TECHNOLOGIES, LLC  
CHILDERSBURG, ALABAMA  
CONTAINER MANAGEMENT PROGRAM**

**I. Scope**

This program applies to all containers used to store hazardous and non-hazardous materials at this facility (i.e. drums, carboys, pails, pallets, etc).

**II. Purpose**

To comply with all federal and state requirements and reduce the risks and liabilities associated with containers and drums storing chemicals and/or other hazardous materials.

**III. Container Requirements**

1. All containers must be properly labeled according to OSHA 29 CFR 1910.1200 Hazard Communication Standards. Containers of hazardous waste must be labeled according to 49 CFR 172.101.
2. Hazardous waste containers must be selected according to the 49 CFR 172.101 Hazardous Materials Table.
3. The generation of hazardous waste must be documented on a Hazardous Waste Log Sheet. Any time hazardous waste is placed into a container, the date, type of hazardous waste generated, unit of measure (u/m - gallons, lbs, ea, etc.), and quantity, followed by the employee's initials, must be documented on this log sheet.
4. All containers must be in reasonably good condition with no severe dents or creases which could diminish the integrity of the container.
5. All container openings (i.e., bungs, clamp tops, pouring spouts, etc.) must be maintained in good working condition such that the openings can be closed as intended.
6. Upon arrival at the facility, production chemicals, paints, oils and lubricants must be stored in the Oil Chemical Storage Area.
7. All containers of hazardous and universal wastes must be kept closed at all times except to add or remove waste.
8. All containers of hazardous material must be kept closed at all times except to add or remove material.

9. All containers must be stored in an upright position in their designated storage area.
10. All container tops must be maintained in a clean and orderly condition at all times. No free liquids or trash are allowed to accumulate at any time.
11. All containers of oil or hazardous material must be placed on spill containment pallets or in a room that is capable of spill containment.
12. The maximum volume of any hazardous waste stream in a satellite accumulation site is 55 gallons. Once this volume is attained, the accumulation date must be added to the container and the container moved to the Hazardous Waste Accumulation Point within three (3) days.
13. Containers of hazardous waste may be stored on site for a maximum of 180 days (180 days from the initial point of accumulation). There is no limit to the volume of hazardous waste that may be stored at the accumulation point.
14. The contents of a container must be completely used before declaring it empty. The definition of an empty container (containers of non-acute hazardous materials less than or equal to 110 gallons) is as follows:
  - All waste has been removed using common practices such as pouring, pumping, etc.
  - No more than one inch (1") of residue is left at the bottom of the container.
  - No more than three percent (3%) by weight of the total capacity of the container remains in the container.
15. Empty containers that once contained a hazardous material or hazardous waste may only be reused to hold a compatible hazardous material or waste. For example, a drum that once contained Xylene could be reused to hold waste Xylene.
16. Empty containers that have never contained a hazardous material or waste may be reused to hold compatible hazardous or non-hazardous materials or wastes.
17. Empty containers reused for other materials must have all unnecessary or misleading labels removed, covered, or painted over, and replaced with labels which correctly identify the contents.
18. Empty steel drums may be stored inside or outside so long as the bungs and lids are closed.

19. Empty steel drums and pails may be disposed of as scrap metal so long as they meet the definition of empty.
20. Empty plastic drums that once contained a chemical will be stored outside. All bungs must be completely closed before placing the drums outside.
21. Empty plastic drums must be recycled or disposed of by an authorized disposal agent.
22. Containers that may have been exposed to chemicals or hazardous materials must not be removed from the facility by an employee. Applicable items include drums, carboys, pails, and pallets used to transport chemicals or hazardous materials.
23. All containers must be handled or stored in a manner that will not damage it and cause a rupture or leak.

#### **IV. Container Labeling**

All container labels can be obtained from the Environmental Coordinator

## **V. Proper Handling of 55-Gallon Drums**

In the typical workplace drums are used to store material, to ship it, to dispense it for use, and to store wastes. All these drums must be moved from time to time. Like most things, there's a right way to move a drum-and several wrong ways to do it. Help prevent injuries and accidental spills by moving drums properly. At least four serious injuries can occur if a drum is not handled safely:

- fractures
- lacerations
- hernias
- back strain

All these injuries are painful and require a long time to heal. By taking a few precautions before you attempt to move a drum, you can help prevent these serious and painful injuries. Before you move a drum, put on a pair of thick gloves. The gloves will help protect your hands. Also follow this preliminary checklist:

- Check to see how much room there is to move the drum.
- Plan your route in advance. Don't wait until the drum is in motion.
- Check the route for anything that might cause you or your equipment to trip or slip.
- Check the drum to make sure it isn't warped. This could cause the drum to slip.
- Check the drum for burrs, which could cause a laceration.
- Check the drum for liquids, which could cause you to lose your grip.
- Check the bung to make sure it is tight enough to prevent leaks.
- If you are moving the drum using a pallet, make sure the pallet is in good condition.

There are four ways to "break," or initially move a drum from its standing position. These are pulling, pushing, or combinations of pulling and pushing, the drag/pull method and the push/pull method. Pulling is necessary when drums are grouped closely together. Pushing is used when there is ample room to work. The drag/pull method is used when there are tight spots in the area you are "breaking" the drum. The push/pull method is used when drums are located beside a wall.

To pull the drum, grip the near chime with one hand and the far chime with the other. Brace your foot at an angle across the bottom chime. Your hands and feet should form a straight line. Check the position of your fingers for possible pinch points. Now you are ready to pull back on the drum.

To push the drum, place your hands near the chime at shoulder width. Move your shoulders low and close to the drum. Slowly push forward with your legs until you feel the drum reach its balance point.

When using the drag/pull method, place your hands at the near position at shoulder width. Brace the drum with your foot to prevent it from sliding, and shift your weight to the rear foot. Pull and drag it a few inches to the left then to the right.

To use the push/pull method, use one hand to pull the far chime. Use the other hand to push against the wall.

If a drum starts to fall, get away from it as quickly as possible. If the contents spill, follow your worksite's procedures for reporting a spill.

If two people are moving a drum, both people can push the drum, pull the drum, or one can push while the other pulls. When rolling the drum, it is safer for one person to roll it.

To roll a drum, in this case to the left, follow these steps:

- Place your left hand high on the chime and your right hand low.
- Use both hands to roll the drum.
- As your right hand reaches the top, quickly switch the left hand to the top position.
- Lift your hands and place them into position. Do not slide your hands because you may cut or burn them.
- Keep your feet separated and do not slide them. Use the side step.
- Turn your body slightly away from the drum, but not too far away.
- Stay close and ahead of the drum.

When you reach your destination, place the drum in its position using the reverse of the push, pull, drag/pull, or push/pull method.

## **VI. Training**

1. All employees responsible for the shipment of hazardous materials must receive biennial DOT Hazardous Materials Management Training.
2. All employees engaged in transporting, using, and/or disposing of hazardous materials must be trained annually in Container Management.

**APPENDIX C**  
**TRAINING**

## **TRAINING OUTLINE**

## **OUTLINE FOR SPILL PREVENTION, CONTROL, AND COUNTERMEASURES TRAINING**

### **I. INITIAL TRAINING.** Initial training shall be provided for all facility personnel within their first week of employment to familiarize employees with the following information:

- A. Summary of spill prevention regulations (40 CFR 112)
- B. Purpose and application of system elements
  - 1. Tanks and associated piping
  - 2. Unloading rack area
  - 3. Accessory equipment (e.g., generator and pumps)
  - 4. Gauges/alarms
  - 5. Spill supplies
- C. Spill prevention
  - 1. Potential spill sources
  - 2. Procedures to prevent spills
  - 3. Inspections/documentation
- D. Spill control
  - 1. Spill flow direction and impact on navigable waters
  - 2. Secondary containment systems
  - 3. Overflow protection and leak detection systems
  - 4. Alarm recognition and response
- E. Spill countermeasures
  - 1. Personnel accountability
  - 2. Spill supplies/equipment use
  - 3. Methods to stop/seal leaks
  - 4. Emergency phone numbers and notifications

### **II. REFRESHER TRAINING.** Annual refresher training shall be provided to highlight and describe, at a minimum, the following:

- A. Known spill events or failures
- B. Malfunctioning components
- C. Recently developed precautionary measures

**III. ON-GOING TRAINING.** On-the-job training or briefings shall be provided throughout the year whenever physical or procedural changes occur at the facility.

## **ATTENDANCE TRAINING RECORD**

Typical Topics Covered: \_\_\_\_\_

Training Aids \_\_\_\_\_

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Instructor
Date

Attachment: Employee Quiz Forms

**APPENDIX D**  
**INSPECTION CHECKLISTS**