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Alabama Department of Environmental Management
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JUL 3 1 2026

MR. PATRICK JORDAN, FACILITY MANAGER
MOBILE ENERGY, LLC
1003 PAPER MILL ROAD
MOBILE, AL 36610

**RE: REVISED DRAFT PERMIT
NPDES PERMIT NUMBER AL0073229**

Dear Mr. Jordan:

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:

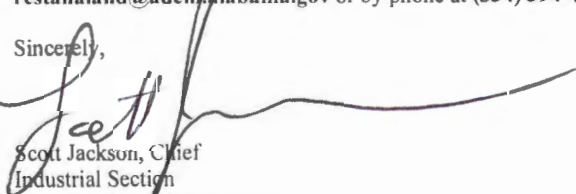
1. The user has logged in to E2 since October 1, 2019; and
2. The E2 user account is set up using a unique email address.

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 Rachel Lounsberry by e-mail at restanaland@adem.alabama.gov or by phone at (334) 394-4366.

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: MOBILE ENERGY, LLC

FACILITY LOCATION: MOBILE ENERGY, LLC
1003 PAPER MILL ROAD
MOBILE, ALABAMA 36610
MOBILE COUNTY

PERMIT NUMBER: AL0073229

RECEIVING WATERS: DSN002 - HOG BAYOU

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

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****DSN002S: Storm water runoff from non-process areas associated with steam and electric power 3/ 4/**

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

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency ²	Sample Type ¹	Seasonal
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Semi-Annually	Grab	All Months
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Copper, Total (As Cu) (01042) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Semi-Annually	Estimate	All Months
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months

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

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

B. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS

1. Representative Sampling

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

2. Test Procedures

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

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

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

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

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

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

3. Recording of Results

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

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

4. Records Retention and Production

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

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

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

5. Monitoring Equipment and Instrumentation

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

C. DISCHARGE REPORTING REQUIREMENTS

1. Reporting of Monitoring Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
 - e. Discharge Monitoring Reports required by this permit, the AWPCA, and the Department's Rules that are being submitted in hard copy shall be addressed to:

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

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

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

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

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

Certified and Registered Mail shall be addressed to:

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

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

2. Noncompliance Notification

a. 24-Hour Noncompliance Reporting

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

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

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

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

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

D. OTHER REPORTING AND NOTIFICATION REQUIREMENTS

1. Anticipated Noncompliance

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

2. Termination of Discharge

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

3. Updating Information

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

4. Duty to Provide Information

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

5. Cooling Water and Boiler Water Additives

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

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

6. Permit Issued Based on Estimated Characteristics

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

E. SCHEDULE OF COMPLIANCE

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

COMPLIANCE SHALL BE ATTAINED ON THE EFFECTIVE DATE OF THIS PERMIT

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

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

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

2. Best Management Practices

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

3. Spill Prevention, Control, and Management

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

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

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

2. Right of Entry and Inspection

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

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

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

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

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

2. Upset

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

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

1. Duty to Comply

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

2. Removed Substances

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

3. Loss or Failure of Treatment Facilities

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

4. Compliance with Statutes and Rules

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

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

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

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

2. Change in Discharge

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

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

3. Transfer of Permit

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

4. Permit Modification and Revocation

- a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:
 - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;
 - (2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or
 - (3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.
- b. This permit may be modified during its term for cause, including but not limited to, the following:
 - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;
 - (2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;
 - (3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;
 - (4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;
 - (5) Errors in calculation of discharge limitations or typographical or clerical errors were made;
 - (6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;
 - (7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;
 - (8) To agree with a granted variance under 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: June 9, 2026
PREPARED BY: Rachel Lounsberry
PREPARED DATE: July 29 2026
PREPARED BY: Rachel Lounsberry

Permittee Name: Mobile Energy, LLC

Facility Name: Mobile Energy, LLC

Permit Number: AL0073229

PERMIT IS REISSUANCE DUE TO EXPIRATION

DISCHARGE SERIAL NUMBERS (DSN) & DESCRIPTIONS:

DSN	Description
002	Storm water runoff from non-process areas associated with steam and electric power.

INDUSTRIAL CATEGORY: NON-CATEGORICAL

MAJOR: No

STREAM INFORMATION:

Receiving Stream: Hog Bayou
Classification: Fish and Wildlife
River Basin: Mobile
7Q10: 0.0 cfs
303(d) List: YES
Impairment: Metals (Mercury)
TMDL: NO

DISCUSSION:

Mobile Energy, LLC is a natural gas-fired electric power generation plant capable of producing 235 MW of electricity. The facility consists of one combustion turbine, one heat recovery steam generator, and one steam turbine. This permit is for the discharge of storm water only. All process wastewater associated with steam and electric power co-generation is discharged to the Wright Smith Jr. Wastewater Treatment Plant through SID Permit IU414900737.

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.

DSN002S: Storm water runoff from non-process areas associated with steam and electric power.

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type	Seasonal	Basis
pH (00400) Effluent Gross Value	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Semi-Annually	Grab	All Months	BPJ
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months	BPJ
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15 Maximum Daily	mg/l	Semi-Annually	Grab	All Months	BPJ
Copper, Total (As Cu) (01042) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months	BPJ
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	All Months	BPJ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Semi-Annually	Estimate	All Months	BPJ
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Semi-Annually	Grab	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:

Oil & Grease

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

pH

The pH as the result of the storm water discharge is not expected to affect the receiving stream. Therefore, pH will be monitor only.

Total Suspended Solids (TSS), COD, Copper, and Zinc

Monitoring for these parameters is based on sampling data submitted in the reissuance application and from historical DMR data submitted by the facility. These parameters will continue to be monitored at a semi-annual frequency as a measure of BMP effectiveness.

303(d) List of Impaired Waters

Hog Bayou is listed on Alabama's 2024 303(d) List of Impaired Waters for metals (Mercury). The source of the impairment is from atmospheric deposition. Since the facility uses natural gas to generate electricity, Mercury is not expected to be in significant amounts in the facility's discharge, and therefore, no monitoring is proposed at this time.

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).

Revision

The facility has provided documentation of their zinc analysis. The facility inadvertently recorded their Zinc incorrectly on their DMRs and permit application. The facility has updated the DMRs to reflect the correct data. This data does not show elevated levels of Zinc in the stormwater; thus, the Pollutant Minimization Plan requirements have been removed.

Lounsberry, Rachel E

From: Jordan, Patrick (EthosEnergy) <Patrick.Jordan@ethosenergy.com>
Sent: Wednesday, July 22, 2026 1:51 PM
To: Lounsberry, Rachel E
Cc: Floreslovo, Gabriela (EthosEnergy); Phil Mackey; Norman, Cory (EthosEnergy); Chafin, Brian (EthosEnergy)
Subject: Mobile Energy NPDES draft comments AL0073229
Attachments: 20379641_frc.pdf; 20349413_frc.pdf; 20378657_frc.pdf

Hi Rachael,

Thank you for taking my call today.

As discussed, I am sending the laboratory reports for calendar year 2025 and the first half of 2026 to help clarify the apparent over-reporting of zinc in the DMR system.

During our review, we identified that the laboratory results were reported in micrograms per liter ($\mu\text{g/L}$), while the DMR system values were entered as milligrams per liter (mg/L), resulting in reported concentrations that appear to be overstated. These lab reports are provided to support our evaluation of the reporting discrepancy and any necessary corrections.

Please let me know if you need any additional information or documentation to assist with your review.

Thank you for your assistance.

Best regards,

Patrick Jordan
Facility Manager
Mobile Energy, LLC
251-287-9015 o
251-454-7568 m
Patrick.Jordan@ethosenergy.com
www.ethosenergy.com



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Pace Analytical Services, LLC
4320 Midmost Dr
Mobile, AL 36609
251-344-9106

March 28, 2025

Patrick Jordan
Mobile Energy, LLC. - Hog Bayou
1003 Paper Mill Rd.
Mobile, AL 36610

RE: Project: Semi-Annual SW 3/24/25
Pace Project No.: 20349413

Dear Patrick Jordan:

Enclosed are the analytical results for sample(s) received by the laboratory on March 24, 2025. The results relate only to the samples included in this report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "MK Brenner".

Mary Kathryn Brenner
marykathryn.brenner@pacelabs.com
251-344-9106
Project Manager

Enclosures

cc: Mellonie Sikes, Mobile Energy, LLC

REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, LLC
4320 Midmost Dr
Mobile, AL 36609
251-344-9106

CERTIFICATIONS

Project: Semi-Annual SW 3/24/25
Pace Project No.: 20349413

Pace Analytical Services New Orleans

Florida Department of Health (NELAC): E87595
Illinois Environmental Protection Agency: 2000662023-7
Kansas Department of Health and Environment (NELAC):
E-10266
Louisiana Dept. of Environmental Quality (NELAC/LELAP):
02006

Texas Commission on Env. Quality (NELAC):
T104704405-23-18
U.S. Dept. of Agriculture Foreign Soil Import: 525-23-117-
89728

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Pace Analytical Services, LLC
4320 Midmost Dr
Mobile, AL 36609
251-344-9106

SAMPLE SUMMARY

Project: Semi-Annual SW 3/24/25
Pace Project No.: 20349413

Lab ID	Sample ID	Matrix	Date Collected	Date Received
20349413001	DSN002S	Water	03/24/25 08:55	03/24/25 13:30

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SAMPLE ANALYTE COUNT

Project: Semi-Annual SW 3/24/25

Pace Project No.: 20349413

Lab ID	Sample ID	Method	Analysts	Analytes Reported
20349413001	DSN002S	EPA 200.7	AJS	3
		EPA 1664B, 2010	TMO	1
		SM 2540D 2011	KCR	1
		SM 4500-H+B	GGG1	1
		SM 5220D	LJL	1

PASI-N = Pace Analytical Services - New Orleans

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ANALYTICAL RESULTS

Project: Semi-Annual SW 3/24/25

Pace Project No.: 20349413

Sample: DSN002S		Lab ID: 20349413001		Collected: 03/24/25 08:55		Received: 03/24/25 13:30		Matrix: Water	
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual	
200.7 Metals, Total		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - New Orleans							
Chromium	ND	ug/L	50.0	1	03/26/25 07:37	03/27/25 13:14	7440-47-3		
Copper	10.9	ug/L	10.0	1	03/26/25 07:37	03/27/25 13:14	7440-50-8		
Zinc	727	ug/L	100	1	03/26/25 07:37	03/27/25 13:14	7440-66-6		
HEM, Oil and Grease		Analytical Method: EPA 1664B, 2010 Pace Analytical Services - New Orleans							
Oil and Grease	ND	mg/L	5.6	1		03/27/25 12:35		P1	
2540D Total Suspended Solids		Analytical Method: SM 2540D 2011 Pace Analytical Services - New Orleans							
Total Suspended Solids	24.6	mg/L	2.5	1		03/26/25 15:52			
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - New Orleans							
pH at 25 Degrees C	7.4	Std. Units	0.010	1		03/26/25 09:46		H3,H6	
5220D COD		Analytical Method: SM 5220D Preparation Method: SM 5220D Pace Analytical Services - New Orleans							
Chemical Oxygen Demand	48.0	mg/L	10.0	1	03/26/25 12:02	03/26/25 15:09			

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QUALITY CONTROL DATA

Project: Semi-Annual SW 3/24/25
Pace Project No.: 20349413

QC Batch:	357556	Analysis Method:	EPA 200.7
QC Batch Method:	EPA 200.7	Analysis Description:	200.7 Metals, Total
		Laboratory:	Pace Analytical Services - New Orleans

Associated Lab Samples: 20349413001

METHOD BLANK: 1726107 Matrix: Water
Associated Lab Samples: 20349413001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium	ug/L	ND	50.0	03/27/25 12:50	
Copper	ug/L	ND	10.0	03/27/25 12:50	
Zinc	ug/L	ND	100	03/27/25 12:50	

LABORATORY CONTROL SAMPLE: 1726108

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	1000	988	99	85-115	
Copper	ug/L	1000	1000	100	85-115	
Zinc	ug/L	1000	992	99	85-115	

MATRIX SPIKE SAMPLE: 1726110

Parameter	Units	20349446001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	0.015 mg/L	1000	1010	99	70-130	
Copper	ug/L	0.039 mg/L	1000	1060	102	70-130	
Zinc	ug/L	0.062 mg/L	1000	1040	98	70-130	

MATRIX SPIKE SAMPLE: 1726111

Parameter	Units	20349413001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	ND	1000	985	98	70-130	
Copper	ug/L	10.9	1000	1010	100	70-130	
Zinc	ug/L	727	1000	1660	93	70-130	

SAMPLE DUPLICATE: 1726109

Parameter	Units	20349446001 Result	Dup Result	RPD	Max RPD	Qualifiers
Chromium	ug/L	0.015 mg/L	14.9J	2	20	
Copper	ug/L	0.039 mg/L	38.4	1	20	
Zinc	ug/L	0.062 mg/L	61.4J	1	20	

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QUALITY CONTROL DATA

Project: Semi-Annual SW 3/24/25

Pace Project No.: 20349413

QC Batch: 357683

Analysis Method: EPA 1664B, 2010

QC Batch Method: EPA 1664B, 2010

Analysis Description: 1664 HEM, Oil and Grease

Laboratory:

Pace Analytical Services - New Orleans

Associated Lab Samples: 20349413001

METHOD BLANK: 1726847

Matrix: Water

Associated Lab Samples: 20349413001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Oil and Grease	mg/L	ND	5.0	03/27/25 12:35	

LABORATORY CONTROL SAMPLE: 1726848

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	40	34.7	87	78-114	

MATRIX SPIKE SAMPLE: 1726849

Parameter	Units	20349785001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	ND	41.7	36.1	83	78-114	P1

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QUALITY CONTROL DATA

Project: Semi-Annual SW 3/24/25

Pace Project No.: 20349413

QC Batch: 357642

Analysis Method: SM 2540D 2011

QC Batch Method: SM 2540D 2011

Analysis Description: 2540D Total Suspended Solids

Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 20349413001

METHOD BLANK: 1726589

Matrix: Water

Associated Lab Samples: 20349413001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Suspended Solids	mg/L	ND	2.5	03/26/25 15:51	

LABORATORY CONTROL SAMPLE: 1726590

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Suspended Solids	mg/L	100	99.0	99	80-120	

SAMPLE DUPLICATE: 1726698

Parameter	Units	20349400001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	525	557	6	20	P1,PK

SAMPLE DUPLICATE: 1726699

Parameter	Units	20349428001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	34.4	39.6	14	20	P1,PK

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QUALITY CONTROL DATA

Project: Semi-Annual SW 3/24/25

Pace Project No.: 20349413

QC Batch: 357549

Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B

Analysis Description: 4500H+B pH

Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 20349413001

LABORATORY CONTROL SAMPLE: 1726076

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
pH at 25 Degrees C	Std. Units	6	6.0	100	99-102	H6

SAMPLE DUPLICATE: 1726077

Parameter	Units	20349399003 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	9.0	9.0	1	20	H3,H6

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QUALITY CONTROL DATA

Project: Semi-Annual SW 3/24/25

Pace Project No.: 20349413

QC Batch: 357574

Analysis Method: SM 5220D

QC Batch Method: SM 5220D

Analysis Description: 5220D COD

Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 20349413001

METHOD BLANK: 1726247

Matrix: Water

Associated Lab Samples: 20349413001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chemical Oxygen Demand	mg/L	ND	10.0	03/26/25 15:07	

LABORATORY CONTROL SAMPLE: 1726248

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chemical Oxygen Demand	mg/L	100	105	105	90-110	

MATRIX SPIKE SAMPLE: 1726250

Parameter	Units	20349557002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chemical Oxygen Demand	mg/L	77.0	100	184	107	75-125	

SAMPLE DUPLICATE: 1726249

Parameter	Units	20349557002 Result	Dup Result	RPD	Max RPD	Qualifiers
Chemical Oxygen Demand	mg/L	77.0	79.0	3	20	

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QUALIFIERS

Project: Semi-Annual SW 3/24/25
Pace Project No.: 20349413

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
ND - Not Detected at or above adjusted reporting limit.
TNTC - Too Numerous To Count
J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
MDL - Adjusted Method Detection Limit.
PQL - Practical Quantitation Limit.
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
S - Surrogate
1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.
LCS(D) - Laboratory Control Sample (Duplicate)
MS(D) - Matrix Spike (Duplicate)
DUP - Sample Duplicate
RPD - Relative Percent Difference
NC - Not Calculable.
SG - Silica Gel - Clean-Up
U - Indicates the compound was analyzed for, but not detected.
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

ANALYTE QUALIFIERS

H3 Sample was received or analysis requested beyond the recognized method holding time.
H6 Analysis initiated outside of the 15 minute EPA required holding time.
P1 Routine initial sample volume or weight was not used for extraction, resulting in elevated reporting limits.
PK Sample volume was decreased because complete filtration was not achieved within the maximum method-specified timeframe.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Semi-Annual SW 3/24/25
Pace Project No.: 20349413

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
20349413001	DSN002S	EPA 200.7	357556	EPA 200.7	357647
20349413001	DSN002S	EPA 1664B, 2010	357683		
20349413001	DSN002S	SM 2540D 2011	357642		
20349413001	DSN002S	SM 4500-H+B	357549		
20349413001	DSN002S	SM 5220D	357574	SM 5220D	357630

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Place* Location Requested (City/State):
Place Analytical Mobile
4320 Midmost Dr, Mobile, AL 36609

CHAIN-OF-CUSTODY Analytical Request Document

Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevant fields

Company Name:	Mobile Energy, LLC. - Hog Bayou	Contact/Report To:	Patrick Jordan
Street Address:	1003 Paper Mill Rd., Mobile, AL 36610	Phone #:	(251)287-9016
		E-Mail:	patrick.jordan@ethosenergygroup.com
		Cc E-Mail:	
Customer Project #:		Invoice To:	Patrick Jordan
Project Name:	Semi-Annual SW	Invoice E-Mail:	patrick.jordan@ethosenergygroup.com
Site Collection Info/Facility ID (as applicable):		Purchase Order # (if applicable):	MOB2058
		Quote #:	
Time Zone Collected	☐ AK ☐ PT ☐ MT ☐ CT ☐ ET	County / State origin of sample(s):	Alabama

Data Deliverables: ☐ Level II ☐ Level III ☐ Level IV ☐ EQUIS ☐ Other _____	Regulatory Program (DW, RCRA, etc.) as applicable:	
	Rush (Pre-approval required): ☐ 2 Day ☐ 3 day ☐ 5 day ☐ Other _____	DW PWSID # or WW Permit # as applicable:
	Date Results Requested:	Field Filtered (if applicable): ☐ Yes ☐ No Analysis:

* Matrix Codes (Insert in Matrix box below): Drinking Water (DW), Ground Water (GW), Waste Water (WW), Product (P), Soil/Solid (SS), Oil (OL), Wipe (WP), Tissue (TS), Bioassay (B), Vapor (V), Other (OT), Surface Water (SW), Sediment (SED), Sludge (SL), Caulk

[illegible]

Customer Remarks: Special Conditions: Possible Hazards: Total Run 1.1" - began @ 0830 End @ 0855 PH 6:15 [Signature]		Collected By: Printed Name: Philip D. McCullough Signature: [Signature]	
Relinquished by/Company: (Signature) [Signature]		Received by/Company: (Signature) [Signature]	
Relinquished by/Company: (Signature) [Signature]		Received by/Company: (Signature) [Signature]	
Relinquished by/Company: (Signature) [Signature]		Received by/Company: (Signature) [Signature]	
Relinquished by/Company: (Signature) [Signature]		Received by/Company: (Signature) [Signature]	



WO#: 20349413



20349413

Specify Container Size **						** Container Size: (1) 1L, (2) 500mL, (3) 250mL, (4) 125mL, (5) 300mL, (6) 40mL vial, (7) EnCere, (8) TerraCore, (9) Other
3	1	3	1	NA		
Identify Container Preservative Type***						*** Preservative Types: (1) None, (2) HNO ₃ , (3) H ₂ SO ₄ , (4) HCl, (5) NaOH, (6) Zn Acetate, (7) NaHSO ₄ , (8) Sod. Thiosulfate, (9) Ascorbic Acid, (10) M+Oit, (11) Other
2	1	3	4	a		
Analysis Requested						

00.7 Cr, Cu, Zn	640D Total Suspended Solids	OD	EM, Oil and Grease	1	Proj. Mgr: Mary Kathryn Brenner AcctNum / Client ID: Table #: Profile / Template: 8827 Prelog / Bottle Ord. ID: See Bottles for EZ# Sample Comment	Preservation non-conformance identified for: Example

Additional Instructions from Pace®:

# Coolers:	Thermometer ID:	Correction Factor (°C):	Obs. Temp. (°C)	Corrected Temp. (°C)
1	111112-001	0	3.3	3.3

Date/Time:	Tracking Number:
3.24.25 1155	Delivered by: ☐ In-Person ☐ Courier
3/24/25 1330	☐ FedEx ☐ UPS ☐ Other
Date/Time:	Page: 1 of 1



Sample Condition Upon Receipt

4320 Midmost Dr. Mobile, AL
36609

WO#: 20349413

PM: MKB

Due Date: 04/03/25

Project

CLIENT: MO-MobEnergy

Courier: ☒ Pace ☐ Client ☐ FedEx ☐ UPS ☐ Other Tracking # _____

Custody Seal on Cooler/Box Present: [see COC]

Custody Seals intact: ☐ Yes ☐ No

Thermometer Used: ☐ Therm Fisher IR 001
☒ Other: MUR-001

Type of Ice: Wet ☐ Blue ☐ None

Samples on ice: [see COC]

Cooler Temperature: [see COC]

Date and Initials of person examining contents: FW 3/24/25

Temp must be measured from temperature blank when present

Comments:

Temperature Blank Present:	☐ Yes ☐ No ☐ N/A	1
Chain of Custody Present:	☐ Yes ☐ No ☐ N/A	2
Chain of Custody Complete:	☐ Yes ☐ No ☐ N/A	3
Chain of Custody Relinquished:	☐ Yes ☐ No ☐ N/A	4
Sampler Name on COC:	☐ Yes ☐ No ☐ N/A	5
Short Hold Time Analyses (<72 hr):	☐ Yes ☐ No ☐ N/A	6
Rush Turn Around Requested:	☐ Yes ☐ No ☐ N/A	7
Samples Arrived within Hold Time:	☐ Yes ☐ No ☐ N/A	8
Sufficient Volume:	☐ Yes ☐ No ☐ N/A	9
Correct Containers Used:	☐ Yes ☐ No ☐ N/A	10
Filtered vol. Rec. for Diss. tests	☐ Yes ☐ No ☐ N/A	11
Sample Labels match COC:	☐ Yes ☐ No ☐ N/A	12
All containers received within manufacturer's precautionary and/or expiration dates:	☐ Yes ☐ No ☐ N/A	13
All containers needing chemical preservation have been checked (except VOA, micro, & O&G):	☐ Yes ☐ No ☐ N/A	14
All containers preservation checked found to be in compliance with EPA recommendation:	☐ Yes ☐ No ☐ N/A	15
Headspace in VOA Vials (>6mm):	☐ Yes ☐ No ☐ N/A	16
Trip Blank Present:	☐ Yes ☐ No	17

Client Notification/Resolution:

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____



Pace Analytical Services, LLC
4320 Midmost Dr
Mobile, AL 36609
251-344-9106

January 16, 2026

Patrick Jordan
Mobile Energy, LLC. - Hog Bayou
1003 Paper Mill Rd.
Mobile, AL 36610

RE: Project: Stormwater Metals 7/24/25
Pace Project No.: 20378657

Dear Patrick Jordan:

Enclosed are the analytical results for sample(s) received by the laboratory on January 14, 2026. The results relate only to the samples included in this report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "MK Brenner".

Mary Kathryn Brenner
marykathryn.brenner@pacelabs.com
251-344-9106
Project Manager

Enclosures

cc: Mellonie Sikes, Mobile Energy, LLC

REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, LLC
4320 Midmost Dr
Mobile, AL 36609
251-344-9106

CERTIFICATIONS

Project: Stormwater Metals 7/24/25
Pace Project No.: 20378657

Pace Analytical Services New Orleans

Florida Department of Health (NELAC): E87595
Illinois Environmental Protection Agency: 2000662024-10
Kansas Department of Health and Environment (NELAC):
E-10266
Louisiana Dept. of Environmental Quality (NELAC/LELAP):
02006

Texas Commission on Env. Quality (NELAC):
T104704405-23-18
U.S. Dept. of Agriculture Foreign Soil Import: 525-23-117-
89728

REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, LLC
4320 Midmost Dr
Mobile, AL 36609
251-344-9106

SAMPLE SUMMARY

Project: Stormwater Metals 7/24/25
Pace Project No.: 20378657

Lab ID	Sample ID	Matrix	Date Collected	Date Received
20378657001	DSN002S	Water	07/24/25 12:30	01/14/26 11:17

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: Stormwater Metals 7/24/25
Pace Project No.: 20378657

Lab ID	Sample ID	Method	Analysts	Analytes Reported
20378657001	DSN002S	EPA 200.7	AJS	3

PASI-N = Pace Analytical Services - New Orleans

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Stormwater Metals 7/24/25

Pace Project No.: 20378657

Sample: DSN002S		Lab ID: 20378657001		Collected: 07/24/25 12:30		Received: 01/14/26 11:17		Matrix: Water	
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual	
200.7 Metals, Total		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - New Orleans							
Chromium	ND	ug/L	50.0	1	01/16/26 06:08	01/16/26 11:58	7440-47-3		
Copper	ND	ug/L	10.0	1	01/16/26 06:08	01/16/26 11:58	7440-50-8		
Zinc	180	ug/L	100	1	01/16/26 06:08	01/16/26 11:58	7440-66-6		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Stormwater Metals 7/24/25
Pace Project No.: 20378657

QC Batch: 379548 Analysis Method: EPA 200.7
QC Batch Method: EPA 200.7 Analysis Description: 200.7 Metals, Total
Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 20378657001

METHOD BLANK: 1845440 Matrix: Water
Associated Lab Samples: 20378657001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium	ug/L	ND	50.0	01/16/26 11:50	
Copper	ug/L	ND	10.0	01/16/26 11:50	
Zinc	ug/L	ND	100	01/16/26 11:50	

LABORATORY CONTROL SAMPLE: 1845441

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	1000	958	96	85-115	
Copper	ug/L	1000	919	92	85-115	
Zinc	ug/L	1000	979	98	85-115	

MATRIX SPIKE SAMPLE: 1845443

Parameter	Units	20378657001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	ND	1000	977	97	70-130	
Copper	ug/L	ND	1000	966	96	70-130	
Zinc	ug/L	180	1000	1180	100	70-130	

MATRIX SPIKE SAMPLE: 1845444

Parameter	Units	20378786001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	ND	1000	983	98	70-130	
Copper	ug/L	ND	1000	968	97	70-130	
Zinc	ug/L	0.032 mg/L	1000	1030	100	70-130	

SAMPLE DUPLICATE: 1845442

Parameter	Units	20378657001 Result	Dup Result	RPD	Max RPD	Qualifiers
Chromium	ug/L	ND	3.4J		20	
Copper	ug/L	ND	5.5J		20	
Zinc	ug/L	180	185	3	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: Stormwater Metals 7/24/25

Pace Project No.: 20378657

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Stormwater Metals 7/24/25
Pace Project No.: 20378657

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
20378657001	DSN002S	EPA 200.7	379548	EPA 200.7	379569

REPORT OF LABORATORY ANALYSIS

[illegible]



Sample Condition Upon Receipt

4320 Midmost Dr. Mobile, AL
36609

Project #:

WO#: 20378657

PM: MKB

Due Date: 01/26/26

CLIENT: MO-MobEnergy

Courier: ☒ Pace ☐ Client ☐ FedEx ☐ UPS ☐ Other Tracking #

Custody Seal on Cooler/Box Present: [see COC]

Custody Seals intact: ☐ Yes ☐ No

Thermometer Used: ☐ Therm Fisher IR 001
☒ Other: MOTM21

Type of Ice: ☒ Wet ☐ Blue ☐ None

Samples on ice: [see COC]

Cooler Temperature: [see COC]

Date and Initials of person examining contents: ur 1/19/26

Temp must be measured from temperature blank when present

Comments:

Temperature Blank Present:	☐ Yes ☒ No ☐ N/A	1
Chain of Custody Present:	☒ Yes ☐ No ☐ N/A	2
Chain of Custody Complete:	☒ Yes ☐ No ☐ N/A	3
Chain of Custody Relinquished:	☒ Yes ☐ No ☐ N/A	4
Sampler Name on COC:	☒ Yes ☐ No ☐ N/A	5
Short Hold Time Analyses (<72 hr):	☐ Yes ☒ No ☐ N/A	6
Rush Turn Around Requested:	☐ Yes ☒ No ☐ N/A	7
Samples Arrived within Hold Time:	☒ Yes ☐ No ☐ N/A	8
Sufficient Volume:	☒ Yes ☐ No ☐ N/A	9
Correct Containers Used:	☒ Yes ☐ No ☐ N/A	10
Filtered vol. Rec. for Diss. tests	☐ Yes ☐ No ☒ N/A	11
Sample Labels match COC:	☒ Yes ☐ No ☐ N/A	12
All containers received within manufacturer's precautionary and/or expiration dates:	☒ Yes ☐ No ☐ N/A	13
All containers needing chemical preservation have been checked (except VOA, micro, & O&G):	☐ Yes ☐ No ☒ N/A	14
All containers preservation checked found to be in compliance with EPA recommendation:	☐ Yes ☐ No ☒ N/A	15
Headspace in VOA Vials (>6mm):	☐ Yes ☐ No ☒ N/A	16
Trip Blank Present:	☐ Yes ☒ No	17

Client Notification/Resolution:

Person Contacted:

Date/Time:

Comments/ Resolution:



Pace Analytical Services, LLC

4320 Midmost Dr

Mobile, AL 36609

251-344-9106

February 04, 2026

Patrick Jordan
Mobile Energy, LLC. - Hog Bayou
1003 Paper Mill Rd.
Mobile, AL 36610

RE: Project: Semi-Annual SW
Pace Project No.: 20379641

Dear Patrick Jordan:

Enclosed are the analytical results for sample(s) received by the laboratory on January 26, 2026. The results relate only to the samples included in this report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - New Orleans

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "MK Brenner".

Mary Kathryn Brenner
marykathryn.brenner@pacelabs.com
251-344-9106
Project Manager

Enclosures

cc: Mellonie Sikes, Mobile Energy, LLC

REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: Semi-Annual SW

Pace Project No.: 20379641

Pace Analytical Services New Orleans

Florida Department of Health (NELAC): E87595

Illinois Environmental Protection Agency: 2000662024-10

Kansas Department of Health and Environment (NELAC):
E-10266

Louisiana Dept. of Environmental Quality (NELAC/LELAP):
02006

Texas Commission on Env. Quality (NELAC):

T104704405-23-18

U.S. Dept. of Agriculture Foreign Soil Import: 525-23-117-
89728

REPORT OF LABORATORY ANALYSIS

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SAMPLE SUMMARY

Project: Semi-Annual SW
Pace Project No.: 20379641

Lab ID	Sample ID	Matrix	Date Collected	Date Received
20379641001	DSN002S	Water	01/24/26 20:45	01/26/26 09:30

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: Semi-Annual SW
Pace Project No.: 20379641

Lab ID	Sample ID	Method	Analysts	Analytes Reported
20379641001	DSN002S	EPA 200.7	AJS	3
		EPA 1664B, 2010	GGG1	1
		SM 2540D 2015	GH1	1
		SM 5220D	JG	1

PASI-N = Pace Analytical Services - New Orleans

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Semi-Annual SW

Pace Project No.: 20379641

Sample: DSN002S		Lab ID: 20379641001		Collected: 01/24/26 20:45		Received: 01/26/26 09:30		Matrix: Water	
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual	
200.7 Metals, Total		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - New Orleans							
Chromium	ND	ug/L	50.0	1	01/28/26 08:56	01/29/26 14:00	7440-47-3		
Copper	ND	ug/L	10.0	1	01/28/26 08:56	01/29/26 14:00	7440-50-8		
Zinc	261	ug/L	100	1	01/28/26 08:56	01/29/26 14:00	7440-66-6		
HEM, Oil and Grease		Analytical Method: EPA 1664B, 2010 Pace Analytical Services - New Orleans							
Oil and Grease	ND	mg/L	5.0	1		01/30/26 04:45			
2540D Total Suspended Solids		Analytical Method: SM 2540D 2015 Pace Analytical Services - New Orleans							
Total Suspended Solids	4.0	mg/L	2.5	1		01/28/26 08:36			
5220D COD		Analytical Method: SM 5220D Preparation Method: SM 5220D Pace Analytical Services - New Orleans							
Chemical Oxygen Demand	14.0	mg/L	10.0	1	01/28/26 12:55	01/28/26 15:14			

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Semi-Annual SW

Pace Project No.: 20379641

QC Batch: 380275

QC Batch Method: EPA 200.7

Analysis Method: EPA 200.7

Analysis Description: 200.7 Metals, Total

Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 20379641001

METHOD BLANK: 1849120

Matrix: Water

Associated Lab Samples: 20379641001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium	ug/L	ND	50.0	01/29/26 13:23	
Copper	ug/L	ND	10.0	01/29/26 13:23	
Zinc	ug/L	ND	100	01/29/26 13:23	

LABORATORY CONTROL SAMPLE: 1849121

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	1000	1020	102	85-115	
Copper	ug/L	1000	969	97	85-115	
Zinc	ug/L	1000	1050	105	85-115	

MATRIX SPIKE SAMPLE: 1849123

Parameter	Units	20379490001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	ND	1000	1010	101	70-130	
Copper	ug/L	ND	1000	982	98	70-130	
Zinc	ug/L	40.3	1000	1070	103	70-130	

MATRIX SPIKE SAMPLE: 1849124

Parameter	Units	20379641001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chromium	ug/L	ND	1000	1050	105	70-130	
Copper	ug/L	ND	1000	1020	102	70-130	
Zinc	ug/L	261	1000	1340	108	70-130	

SAMPLE DUPLICATE: 1849122

Parameter	Units	20379490001 Result	Dup Result	RPD	Max RPD	Qualifiers
Chromium	ug/L	ND	.86J		20	
Copper	ug/L	ND	2.6J		20	
Zinc	ug/L	40.3	40.8J	1	20	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Semi-Annual SW

Pace Project No.: 20379641

QC Batch: 380391

Analysis Method: EPA 1664B, 2010

QC Batch Method: EPA 1664B, 2010

Analysis Description: 1664 HEM, Oil and Grease

Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 20379641001

METHOD BLANK: 1849637

Matrix: Water

Associated Lab Samples: 20379641001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Oil and Grease	mg/L	ND	5.0	01/30/26 04:45	

LABORATORY CONTROL SAMPLE: 1849638

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	40	32.5	81	78-114	

MATRIX SPIKE SAMPLE: 1849639

Parameter	Units	20379747001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	ND	40	36.6	89	78-114	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Semi-Annual SW
Pace Project No.: 20379641

QC Batch:	380282	Analysis Method:	SM 2540D 2015
QC Batch Method:	SM 2540D 2015	Analysis Description:	2540D Total Suspended Solids
		Laboratory:	Pace Analytical Services - New Orleans

Associated Lab Samples: 20379641001

METHOD BLANK: 1849144 Matrix: Water

Associated Lab Samples: 20379641001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Suspended Solids	mg/L	ND	2.5	01/28/26 08:35	

LABORATORY CONTROL SAMPLE: 1849145

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Suspended Solids	mg/L	100	94.0	94	80-120	

SAMPLE DUPLICATE: 1849163

Parameter	Units	20379640001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	ND	ND		20	

SAMPLE DUPLICATE: 1849164

Parameter	Units	20379737001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	35.3	36.7	4	20	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: Semi-Annual SW

Pace Project No.: 20379641

QC Batch: 380290

QC Batch Method: SM 5220D

Analysis Method: SM 5220D

Analysis Description: 5220D COD

Laboratory: Pace Analytical Services - New Orleans

Associated Lab Samples: 20379641001

METHOD BLANK: 1849159

Matrix: Water

Associated Lab Samples: 20379641001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chemical Oxygen Demand	mg/L	ND	10.0	01/28/26 15:08	

LABORATORY CONTROL SAMPLE: 1849160

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chemical Oxygen Demand	mg/L	100	109	109	90-110	

MATRIX SPIKE SAMPLE: 1849162

Parameter	Units	20378622001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chemical Oxygen Demand	mg/L	70.0	100	194	124	75-125	

SAMPLE DUPLICATE: 1849161

Parameter	Units	20378622001 Result	Dup Result	RPD	Max RPD	Qualifiers
Chemical Oxygen Demand	mg/L	70.0	65.0	7	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: Semi-Annual SW

Pace Project No.: 20379641

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

REPORT OF LABORATORY ANALYSIS

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without the written consent of Pace Analytical Services, LLC.



QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Semi-Annual SW
Pace Project No.: 20379641

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
20379641001	DSN002S	EPA 200.7	380275	EPA 200.7	380356
20379641001	DSN002S	EPA 1664B, 2010	380391		
20379641001	DSN002S	SM 2540D 2015	380282		
20379641001	DSN002S	SM 5220D	380290	SM 5220D	380326

REPORT OF LABORATORY ANALYSIS

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without the written consent of Pace Analytical Services, LLC.

Pace* Location Requested (City/State): Pace Analytical Mobile 4320 Midmost Dr, Mobile, AL 36609		CHAIN-OF-CUSTODY Analytical Request Document Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevant fields		WO# : 20379641 20379641																																																																					
Company Name: Mobile Energy, LLC. - Hog Bayou Street Address: 1003 Paper Mill Rd., Mobile, AL 36610		Contact/Report To: Patrick Jordan Phone #: (251)287-9016 E-Mail: patrick.jordan@ethosenergygroup.com Cc E-Mail:		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="10" style="text-align: center;">Specify Container Size **</td> <td colspan="10" rowspan="3" style="font-size: 0.8em;"> **Container Size: (1) 1L, (2) 500mL, (3) 250mL, (4) 125mL, (5) 100mL, (6) 40mL vial, (7) EnCore, (8) TerraCore, (9) Other </td> </tr> <tr> <td colspan="10" style="text-align: center;">Identify Container Preservative Type***</td> </tr> <tr> <td colspan="10" style="text-align: center;">Analysis Requested</td> </tr> <tr> <td colspan="10" style="text-align: center;"> 3 1 3 1 NA </td> <td colspan="10" style="text-align: center;"> 2 1 3 4 a </td> </tr> </table>										Specify Container Size **										**Container Size: (1) 1L, (2) 500mL, (3) 250mL, (4) 125mL, (5) 100mL, (6) 40mL vial, (7) EnCore, (8) TerraCore, (9) Other										Identify Container Preservative Type***										Analysis Requested										3 1 3 1 NA										2 1 3 4 a									
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Customer Project #: Project Name: Semi-Annual SW		Invoice To: Patrick Jordan Invoice E-Mail: patrick.jordan@ethosenergygroup.com																																																																							
Site Collection Info/Facility ID (as applicable):		Purchase Order # (if applicable): MOB2058 Quote #		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="10" rowspan="4" style="text-align: center; font-size: 0.8em;"> *** Preservative Types: (1) None, (2) HNO3, (3) H2SO4, (4) HCl, (5) NaOH, (6) Zn Acetate, (7) NaHSO4, (8) Sou Thiosulfate, (9) Ascorbic Acid, (10) MeOH, (11) Other </td> </tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> </table>										*** Preservative Types: (1) None, (2) HNO3, (3) H2SO4, (4) HCl, (5) NaOH, (6) Zn Acetate, (7) NaHSO4, (8) Sou Thiosulfate, (9) Ascorbic Acid, (10) MeOH, (11) Other																																																											
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Time Zone Collected: ☐ AK ☐ PT ☐ MT ☐ CT ☐ ET		County / State origin of sample(s): Alabama		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="10" rowspan="4" style="text-align: center; font-size: 0.8em;"> Lab Use Only Proj. Mgr: Mary Kathryn Brenner AcctNum / Client ID: Table #: Profile / Template: 8827 Prelog / Bottle Ord. ID: See Bottles for EZ# Sample Comment </td> </tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> </table>										Lab Use Only Proj. Mgr: Mary Kathryn Brenner AcctNum / Client ID: Table #: Profile / Template: 8827 Prelog / Bottle Ord. ID: See Bottles for EZ# Sample Comment																																																											
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Data Deliverables: ☐ Level II ☐ Level III ☐ Level IV ☐ EQUIS ☐ Other		Regulatory Program (DW, RCRA, etc.) as applicable: Rush (Pre-approval required): ☐ 12 Day ☐ 13 day ☐ 15 day ☐ Other		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="10" rowspan="4" style="text-align: center; font-size: 0.8em;"> Preservation non-conformance identified for sample. </td> </tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> </table>										Preservation non-conformance identified for sample.																																																											
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* Matrix Codes (Insert in Matrix box below): Drinking Water (DW), Ground Water (GW), Waste Water (WW), Product (P), Soil/Solid (SS), Oil (OL), Wipe (WP), Tissue (TS), Bioassay (B), Vapor (V), Other (OT), Surface Water (SW), Sediment (SED), Sludge (SL), Caulk		DW PWSID # or WW Permit # as applicable: Date Results Requested:		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="10" rowspan="4" style="text-align: center; font-size: 0.8em;"> Field Filtered (if applicable): ☐ Yes ☐ No Analysis: </td> </tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> <tr><td colspan="10"></td></tr> </table>										Field Filtered (if applicable): ☐ Yes ☐ No Analysis:																																																											
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DSN0025		WT		1/24/26		2045		3		1		X X X X X																																																													
PH		5.89		Time Rain Started		18:35		Sample Time		2045		Rain Amount		0.2																																																											
Collected By		Andrew Thrash		1-25-26 0400		1-25-26 0400		1-25-26 1600		1-26-26 0400		1-26-26 0930																																																													



Sample Condition Upon Receipt

4320 Midmost Dr. Mobile, AL
36609

Project #:

WO#: 20379641

PM: MKB

Due Date: 02/05/26

CLIENT: MO-MobEnergy

Courier: ☒ Pace ☐ Client ☐ FedEx ☐ UPS ☐ Other Tracking # H09

Custody Seal on Cooler/Box Present: [see COC] Custody Seals intact: ☐ Yes ☐ No

Thermometer Used: ☐ Therm Fisher IR 001
☒ Other: MOTM21

Type of Ice: ☒ Wet ☐ Blue ☐ None

Samples on ice: [see COC]

Cooler Temperature: [see COC]

Date and Initials of person examining contents: AK

Temp must be measured from temperature blank when present

Comments:

Temperature Blank Present:	☐ Yes ☒ No ☐ N/A	1
Chain of Custody Present:	☒ Yes ☐ No ☐ N/A	2
Chain of Custody Complete:	☒ Yes ☐ No ☐ N/A	3 collection date and time missing
Chain of Custody Relinquished:	☐ Yes ☐ No ☐ N/A	4
Sampler Name on COC:	☒ Yes ☐ No ☐ N/A	5
Short Hold Time Analyses (<72 hr):	☐ Yes ☐ No ☐ N/A	6
Rush Turn Around Requested:	☐ Yes ☒ No ☐ N/A	7
Samples Arrived within Hold Time:	☒ Yes ☐ No ☐ N/A	8
Sufficient Volume:	☒ Yes ☐ No ☐ N/A	9
Correct Containers Used:	☒ Yes ☐ No ☐ N/A	10
Filtered vol. Rec. for Diss. tests	☐ Yes ☐ No ☒ N/A	11
Sample Labels match COC:	☒ Yes ☐ No ☐ N/A	12
All containers received within manufacturer's precautionary and/or expiration dates:	☒ Yes ☐ No ☐ N/A	13
All containers needing chemical preservation have been checked (except VOA, micro, & O&G):	☒ Yes ☐ No ☐ N/A	14
All containers preservation checked found to be in compliance with EPA recommendation:	☐ Yes ☐ No ☒ N/A	15 If No, was preservative added? ☐ Yes ☐ No If added record lot no.: HNO3 _____ H2SO4 _____
Headspace in VOA Vials (>6mm):	☐ Yes ☐ No ☒ N/A	16
Trip Blank Present:	☐ Yes ☒ No	17

Client Notification/Resolution:

Person Contacted:

Date/Time:

Comments/ Resolution:

OK on COC - collected collection time from sample bottles

November 7, 2025

Alabama Department of Environmental Management
Water Division – Industrial Section
P.O. Box 301463
Montgomery, AL 36130-1463

Subject: National Pollutant Discharge Elimination System Renewal Application
Mobile Energy, LLC – Hog Bayou Energy Center
Permit # AL0073229

To Whom it May Concern:

This permitting action is for the renewal of the application for the renewal of the National Pollutant Discharge Elimination System (NPDES) permit for the Mobile Energy LLC Hog Bayou Energy Center (HBEC) located at 1003 Paper Mill Road in Mobile, Alabama. HBEC is currently permitted to discharge stormwater through a single outfall to Hog Bayou under NPDES permit AL0073229.

There are no changes to the permitted system presented in the application. The Duly Authorized Representative and the DMR Contact for the site has been changed from Dana McNally to Patrick Jordan.

If you have any questions or comments regarding this application, please contact the undersigned at (251) 287-9015 or Patrick.Jordan@ethosenergy.com.

Sincerely,

Patrick Jordan
Facility Manger – HBEC

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

version 2.11

(Submission #: HQD-4F4Z-SK0C7, version 1)

Digitally signed by:
AEPACS
Date: 2025.11.07 15:33:09 -06:00
Reason: Submission Data
Location: State of Alabama

Details

Submission ID HQD-4F4Z-SK0C7

Form Input

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:

NONE PROVIDED

General Information

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

IU414900737

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

AL0073229

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

AL0073229

Current Permittee Name

Mobile Energy, LLC

Permittee

Permittee Name

Mobile Energy, LLC

Mailing Address

1003 Paper Mill Road

Mobile, AL 36610

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

Michael

Last Name

Madia

Title

Managing Director

Organization Name

Mobile Energy, LLC

Phone Type

Number

Extension

Business

9175457963

Email

Michael.Madia@ArgoIP.com

Mailing Address

1003 Paper Mill Road

Mobile, AL 36610

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?
Environmental Contact, DMR Contact, Authorized Rep	Dana McNally	Remove
Responsible Official, Notification Recipient	Michael Madia	Keep
Permittee	Mobile Energy, 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)

[2025-10 MEC NPDES DOA by RO mm signed 30Sep2025.pdf - 10/01/2025 01:08 PM](#)

Comment

NONE PROVIDED

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

Authorized Rep

Prefix

Mr.

First Name Last Name

Patrick Jordan

Title

Facility Manager

Organization Name

Mobile Energy, LLC

Phone Type Number Extension

Business 2512879015

Email

Patrick.Jordan@ethosenergy.com

Mailing Address

1003 Paper Mill Road

Mobile, AL 36610

United States

Facility/Site Information

Facility/Site Name

Mobile Energy, LLC

Organization/Ownership Type

LLC

Facility/Site Address or Location Description

1003 Paper Mill Road

Mobile, AL 36610

Facility/Site County

Mobile

Detailed Directions to the Facility/Site

NONE PROVIDED

Facility Map

[HBEC NPDES Site Plan 10-2025.pdf - 10/16/2025 03:47 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

30.748817869388922,-88.0580895549413

1003 Paper Mill Road, Mobile, AL

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

4911-Electric Services

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

221112-Fossil Fuel Electric Power Generation

Facility/Site Contact**Prefix**

Mr..

First Name

Patrick

Last Name

Jordan

Title

Facility Manager

Organization Name

Mobile Energy, LLC

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

Business

2512879015

Email

Patrick.Jordan@ethosenergy.com

Address

1003 Paper Mill Road

Mobile, AL 36610

DMR Contact(s) (1 of 1)

DMR Contact**Prefix**

Mr.

First Name

Patrick

Last Name

Jordan

Title

Facility Manager

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

Business

2512879015

Email

Patrick.Jordan@ethosenergy.com

Address

1003 Paper Mill Road

Mobile, AL 36610

Applicant Business Entity Information**Address of Incorporation**

1003 Paper Mill Road

Mobile, AL 36610

Agent Designated by the Corporation for Purposes of Service

Name	Address
Anna Prata	Argo Infrastructure Partners 650 Fifth Avenue, 35th Floor New York, NY 10019

Please provide all corporate officers

Name	Title	Address
Michael Madia	Managing Director	Argo Infrastructure Partners 650 Fifth Avenue, 35th Floor New York, NY 10019
Jason Zibarras	Founding Partner	Argo Infrastructure Partners 650 Fifth Avenue, 35th Floor New York, NY 10019
Andrew Zaroulis	Managing Director	Argo Infrastructure Partners 650 Fifth Avenue, 35th Floor New York, NY 10019
Hugh Au	Managing Director	Argo Infrastructure Partners 650 Fifth Avenue, 35th Floor New York, NY 10019
Richard Klapow	Managing Director	Argo Infrastructure Partners 650 Fifth Avenue, 35th Floor New York, NY 10019

Does the applicant applying for coverage have a Parent Corporation?

Yes

Parent Corporation of Applicant

Name	Address
Argo Infrastructure Partners	650 Fifth Avenue, 35th Floor New York, NY 10019

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?

No

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:

Steam and Electric

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

The facility is a natural gas fired electric power generation plant capable of producing a nominal 235 megawatts (MW) of electricity. The facility consists of one combustion turbine (CT), one heat recovery steam generator (HRSG), and one steam turbine (ST).

Outfalls (1 of 1)

002

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

NONE PROVIDED

Outfall Identifier

002

Receiving Water

Hog Bayou

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

NONE PROVIDED

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

Intermittent Discharge

Estimated Average Daily Flow (MGD)

0.00004

Monitoring/Sampling Point Location

30.74899700000000, -88.05687800000000

Coastal Zone Information

Is the discharge(s) located within the 10-foot elevation contour and within the limits of Mobile or Baldwin County?

Yes

Does the project require new construction?

No

Will the project be a source of new air emissions?

No

Does the project involve dredging and/or filling of a wetland area or water way?

No

Does the project involve wetlands and/or submersed grassbeds?

No

Are oyster reefs located near the project site?

No

Does the project involve the site development, construction and operation of an energy facility as defined in ADEM Admin. Code r. 335-8-1-.02(bb)?

No

Does the project involve mitigation of shoreline or coastal area erosion?

No

Does the project involve construction on beaches or dune areas?

No

Will the project interfere with public access to coastal waters?

No

Does the project lie within the 100-year floodplain?

Yes

Does the project involve the registration, sale, use, or application of pesticides?

No

Does the project propose or require construction of a new well or to alter an existing groundwater well to pump more than 50 gallons per day (GPD)?

No

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	N/A
Automatic Sampling Equipment	N/A

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

Planned	Yes/No
Continuous Wastewater Flow Metering Equipment	N/A
Automatic Sampling Equipment	N/A

Please attach the process schematic with sampling equipment locations.

[NPDES stormwater schematic.pdf - 09/16/2025 03:58 PM](#)

Comment

No schematic is required since stormwater is sampled manually via grab sample and not with automatic sampling equipment

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

No

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

Yes

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

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

List of Biocides

Please list biocides below:
Biosperse 244
Biosperse CN4200
Sodium Hypochlorite

Biocide/Corrosion Inhibitor Summary Sheet

[HBEC biocide inhibitor list 10-1-25.pdf - 10/02/2025 01:10 PM](#)

Comment

Biocides and inhibitors are used at the facility; however, they are not discharged through the stormwater outfall. Outfall DSN001 in the SID permit may potentially contain residual biocides and inhibitors from the cooling tower blowdown.

Safety Data Sheets (SDS)

[Hog Bayou Energy Center Chemical Additives SDS narrative.pdf - 10/01/2025 03:32 PM](#)

Comment

SDS not required

Treatment

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

No

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

No

Facility Operational Characteristics

Indicate whether the facility discharge is:

Continuous through the year

Comments:

NONE PROVIDED

Non-Discharged Wastes

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

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

[HBEC EPA Form 1 signed 11-4-2025.pdf - 11/07/2025 02:14 PM](#)

Comment

NONE PROVIDED

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

[HBEC EPA Form 2F signed 11-4-2025.pdf - 11/07/2025 02:14 PM](#)

Comment

The site drainage map required by Form 2F is attached to this application in the facility/site information. The non-stormwater discharge narrative is provided in "other attachments."

Other attachments (as needed)

[HBEC USGS Quadrangle.jpg - 10/02/2025 01:12 PM](#)

[HBEC Site Topo Map.jpg - 10/02/2025 01:12 PM](#)

[HBEC Non-Stormwater Discharge Narrative.pdf - 10/02/2025 02:29 PM](#)

Comment

Topographic maps as required in Form 1. Non-stormwater discharge information for Form 2F - Section 5.

Additional Attachments

Please attach any additional information as needed.

[HBEC NPDES cover letter 2025.pdf - 11/07/2025 02:16 PM](#)

Comment

NONE PROVIDED

Application Preparer

Application Preparer**Prefix**

Mr.

First Name

Philip

Last Name

Mackey

Title

Project Manager

Organization Name

Southshore Environmental, Inc.

Phone Type

Mobile

Number

7026905258

Extension**Email**

pmackey@southshoreenv.com

Address

[NO STREET ADDRESS SPECIFIED]

[NO CITY SPECIFIED], [NO STATE SPECIFIED] [NO ZIP CODE SPECIFIED]

Agreements and Signature(s)

SUBMISSION AGREEMENTS

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

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

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

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

The application 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 Patrick Jordan on 11/07/2025 at 3:26 PM

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Form 1 NPDES		U.S. Environmental Protection Agency Application for NPDES Permit to Discharge Wastewater GENERAL INFORMATION
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SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(F) AND (F)(1))

Activities Requiring an NPDES Permit	<u>1.1</u>	Applicants Not Required to Submit Form 1		
	1.1.1	Is the facility a new or existing publicly owned treatment works or has your permitting authority directed you to submit Form 2A? If yes, STOP. Do NOT complete Form 1. Complete Form 2A. If the facility is also a treatment works treating domestic sewage , you must also complete Form 2S.	1.1.2	Is the facility a sludge-only facility (i.e., a facility that does not discharge wastewater to surface waters)? If yes, STOP. Do NOT complete Form 1. Complete Form 2S.
		☒ Yes ☐ No		☒ Yes ☐ No
	<u>1.2</u>	Applicants Required to Submit Form 1		
	1.2.1	Is the facility a concentrated animal feeding operation or a concentrated aquatic animal production facility ? ☐ Yes → Complete Form 1 and Form 2B. ☒ No	1.2.2	Is the facility an existing manufacturing, commercial, mining, or silvicultural facility that is currently discharging process wastewater ? ☐ Yes → Complete Form 1 and Form 2C. ☒ No
	1.2.3	Is the facility a new manufacturing, commercial, mining, or silvicultural facility that has not yet commenced to discharge ? ☐ Yes → Complete Form 1 and Form 2D. ☒ No	1.2.4	Is the facility a new or existing manufacturing, commercial, mining, or silvicultural facility that discharges only nonprocess wastewater ? ☐ Yes → Complete Form 1 and Form 2E. ☒ No
1.2.5	Is the facility a new or existing facility whose discharge is composed entirely of stormwater associated with industrial activity or whose discharge is composed of both stormwater and non-stormwater ? ☒ Yes → Complete Form 1 and Form 2F unless exempted by 40 CFR 122.26(b)(14)(x) or (b)(15). ☐ No	1.2.6	Is the facility a new or existing treatment works treating domestic sewage that discharges wastewater to surface waters? ☐ Yes → Complete Form 1, Form 2S, and any other applicable forms, as directed by your permitting authority. ☒ No	

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

Name, Mailing Address, and Location	<u>2.1</u>	Facility Name		
		Mobile Energy LLC		
	<u>2.2</u>	EPA Identification Number		
		ALR000014902		
	<u>2.3</u>	Facility Contact		
	Name (first and last) Patrick Jordan	Title Facility Manager	Phone number (251) 287-9015	
	Email address Patrick.Jordan@ethosenergy.com			

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Name, Mailing Address, and Location Continued	<u>2.4</u>	Facility Mailing Address		
	Street or P.O. box 1003 Paper Mill Road			
	City or town Mobile		State AL	ZIP code 36610
	<u>2.5</u>	Facility Location		
	Street, route number, or other specific identifier 1003 Paper Mill Road			
	County name Mobile		County code (if known) 097	
	City or town Mobile		State AL	ZIP code 36610

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

SIC and NAICS Codes	<u>3.1</u>	SIC Code(s)	Description (optional)
		4911	Electric Services
	<u>3.2</u>	NAICS Code(s)	Description (optional)
		221112	Fossil Fuel Electric Power Generation

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

Operator Information	<u>4.1</u>	Name of Operator	
	EthosEnergy PPS		
	<u>4.2</u>	Is the name you listed in Item 4.1 also the owner? ☐ Yes ☒ No	
	<u>4.3</u>	Operator Status ☐ Public—federal ☐ Public—state ☐ Other public (specify) _____ ☒ Private ☐ Other (specify) _____	
	<u>4.4</u>	Phone Number of Operator (251) 330-1031	

EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility Name Mobile Energy LLC	OMB No. 2040-0004 Expires 07/31/2026
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Operator Information Continued	4.5	Operator Address Street or P.O. Box Brokhollow Central I, 2800 North Loop West City or town State ZIP code Houston TX 77092 Email address of operator Patrick.Jordan@ethosenergy.com
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SECTION 5. INDIAN LAND (40 CFR 122.21(F)(5))		
Indian Land	5.1	Is the facility located on Indian Land? ☐ Yes ☒ No

SECTION 6. EXISTING ENVIRONMENTAL PERMITS (40 CFR 122.21(F)(6))			
Existing Environmental Permits	6.1	Existing Environmental Permits (check all that apply and print or type the corresponding permit number for each)	
		☒ NPDES (discharges to surface water) AL0072339	☒ RCRA (hazardous wastes) ALR000014902
		☒ PSD (air emissions) 503-8066-X001	☐ Nonattainment program (CAA) ☐ NESHAPs (CAA)
		☐ Ocean dumping (MPRSA)	☐ Dredge or fill (CWA Section 404) ☒ Other (specify) IU-41-49-00737 (SID Permit)

SECTION 7. MAP (40 CFR 122.21(F)(7))		
Map	7.1	Have you attached a topographic map containing all required information to this application? (See instructions for specific requirements.) ☒ Yes ☐ CAFO—Not Applicable (See requirements in Form 2B.)

SECTION 8. NATURE OF BUSINESS (40 CFR 122.21(F)(8))		
Nature of Business	8.1	Describe the nature of your business. Mobile Energy LLC (the "facility") is located within the former International Paper Complex, which is now owned by the Alabama State Docks, in Mobile, AL. The facility is a natural gas-fired electric power generation plant capable of producing a nominal 235 megawatts of electricity. The facility consists of one combustion turbine, one heat recovery steam generator, and one steam turbine.

SECTION 9. COOLING WATER INTAKE STRUCTURES (40 CFR 122.21(F)(9))		
Cooling Water Intake Structures	9.1	Does your facility use cooling water? ☒ Yes ☐ No → SKIP to Item 10.1.
	9.2	Identify the source of cooling water. (Note that facilities that use a cooling water intake structure as described at 40 CFR 125, Subparts I and J may have additional application requirements at 40 CFR 122.21(r). Consult with your NPDES permitting authority to determine what specific information needs to be submitted and when.) Cooling water is provided by the Mobile Area Water and Sewer System.

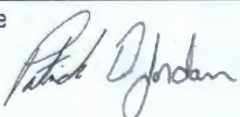
EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility Name Mobile Energy LLC
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SECTION 10. VARIANCE REQUESTS (40 CFR 122.21(F)(10))

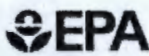
Variance Requests	10.1	Do you intend to request or renew one or more of the variances authorized at 40 CFR 122.21(m)? (Check all that apply. Consult with your NPDES permitting authority to determine what information needs to be submitted and when.)	
	☐	Fundamentally different factors (CWA Section 301(n))	☐ Water quality related effluent limitations (CWA Section 302(b)(2))
	☐	Non-conventional pollutants (CWA Section 301(c) and (g))	☐ Thermal discharges (CWA Section 316(a))
	☒	Not applicable	

SECTION 11. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(A) AND (D))

Checklist and Certification Statement	11.1	In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.	
		Column 1	Column 2
	☒	Section 1: Activities Requiring an NPDES Permit	☐ w/ attachments
	☒	Section 2: Name, Mailing Address, and Location	☐ w/ attachments
	☒	Section 3: SIC Codes	☐ w/ attachments
	☒	Section 4: Operator Information	☐ w/ attachments
	☒	Section 5: Indian Land	☐ w/ attachments
	☒	Section 6: Existing Environmental Permits	☐ w/ attachments
	☒	Section 7: Map	☒ w/ topographic map ☒ w/ additional attachments
	☒	Section 8: Nature of Business	☐ w/ attachments
	☒	Section 9: Cooling Water Intake Structures	☐ w/ attachments
	☒	Section 10.: Variance Requests	☐ w/ attachments
	☒	Section 11: Checklist and Certification Statement	☐ w/ attachments
	11.2	Provide the following certification. (See instructions to determine the appropriate person to sign the application.)	
	Certification Statement <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) Patrick Jordan		Official title Facility Manager	
Signature 		Date signed Nov 4, 2025	

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Form 2F NPDES		U.S Environmental Protection Agency Application for NPDES Permit to Discharge Wastewater
		STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY

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

Outfall Location	<u>1.1</u>	Provide information on each of the facility's outfalls in the table below			
		Outfall Number	Receiving Water Name	Latitude	Longitude
		DSN002S	Hog Bayou	30 44 56.39 N	88 3 24.76 W

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

Improvements	<u>2.1</u>	Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application? ☐ Yes ☒ No → SKIP to Section 3.			
	<u>2.2</u>	Briefly identify each applicable project in the table below.			
		Brief Identification and Description of Project	Affected Outfalls (list outfall numbers)	Source(s) of Discharge	Final Compliance Dates
					Required Projected
<u>2.3</u>	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? <i>(optional item)</i> ☐ Yes ☐ No				

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SECTION 3. SITE DRAINAGE MAP (40 CFR 122.26(C)(1)(I)(A))

Site Drainage Map	<u>3.1</u>	Have you attached a site drainage map containing all required information to this application? (See instructions for specific guidance.)
	☒	Yes

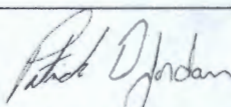
SECTION 4. POLLUTANT SOURCES (40 CFR 122.26(C)(1)(I)(B))

Pollutant Sources	<u>4.1</u>	Provide information on the facility's pollutant sources in the table below.			
		Outfall Number	Impervious Surface Area (within a mile radius of the facility)	Total Surface Area Drained (within a mile radius of the facility)	
		DSN002S	3	specify units acres	3.33 specify units acres
				specify units	specify units
				specify units	specify units
				specify units	specify units
				specify units	specify units
				specify units	specify units
				specify units	specify units
				specify units	specify units
				specify units	specify units
				specify units	specify units
	<u>4.2</u>	Provide a narrative description of the facility's significant material in the space below. (See instructions for content requirements.) No materials are stored or managed in a manner to allow exposure to stormwater. All materials are stored in building or have adequate secondary containment. Process wastewater is discharged to the SID outfall (DSN S01).			
	<u>4.3</u>	Provide the location and a description of existing structural and non-structural control measures to reduce pollutants in stormwater runoff. (See instructions for specific guidance.)			
		Stormwater Treatment			
	Outfall Number	Control Measures and Treatment	Codes from Exhibit 2F-1 (list)		
	DSN002S	No treatment of runoff is conducted. Materials are isolated from stormwater.	N/A		

EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility Name Mobile Energy LLC
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SECTION 5. NON STORMWATER DISCHARGES (40 CFR 122.26(C)(1)(I)(C))

Non-Stormwater Discharges	<u>5.1</u>	Provide the following certification. (See instructions to determine the appropriate person to sign the application.) <i>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.</i>			
		Name (print or type first and last name)	Official title		
		Patrick Jordan	Facility Manager		
		Signature	Date signed		
			Nov 4, 2025		
	<u>5.2</u>	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
		DSN0025	Not Applicable - see attached narrative		

SECTION 6. SIGNIFICANT LEAKS OR SPILLS (40 CFR 122.26(C)(1)(I)(D))

Significant Leaks or Spills	<u>6.1</u>	Describe any significant leaks or spills of toxic or hazardous pollutants in the last three years. None

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.	
	<u>7.1</u>	Is this a new source or new discharge?
	☐	Yes → See instructions regarding submission of estimated data.
	☒	No → See instructions regarding submission of actual data.
	Tables A, B, C, and D	
	<u>7.2</u>	Have you completed Table A for each outfall?
	☒	Yes

EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility Name Mobile Energy LLC
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Discharge Information Continued	<u>7.3</u>	Is the facility subject to an effluent limitation guideline (ELG) or effluent limitations in an NPDES permit for its process wastewater? ☐ Yes ☒ No → SKIP to Item 7.5.
	<u>7.4</u>	Have you completed Table B by providing quantitative data for those pollutants that are (1) limited either directly or indirectly in an ELG and/or (2) subject to effluent limitations in an NPDES permit for the facility's process wastewater? ☐ Yes
	<u>7.5</u>	Do you know or have reason to believe any pollutants in Exhibit 2F-2 are present in the discharge? ☒ Yes ☐ No → SKIP to Item 7.7.
	<u>7.6</u>	Have you listed all pollutants in Exhibit 2F-2 that you know or have reason to believe are present in the discharge and provided quantitative data or an explanation for those pollutants in Table C? ☒ Yes
	<u>7.7</u>	Do you qualify for a small business exemption under the criteria specified in the Instructions? ☐ Yes → SKIP to Item 7.18. ☒ No
	<u>7.8</u>	Do you know or have reason to believe any pollutants in Exhibit 2F-3 are present in the discharge? ☒ Yes ☐ No → SKIP to Item 7.10.
	<u>7.9</u>	Have you listed all pollutants in Exhibit 2F-3 that you know or have reason to believe are present in the discharge in Table C? ☒ Yes
	<u>7.10</u>	Do you expect any of the pollutants in Exhibit 2F-3 to be discharged in concentrations of 10 ppb or greater? ☒ Yes ☐ No → SKIP to Item 7.12.
	<u>7.11</u>	Have you provided quantitative data in Table C for those pollutants in Exhibit 2F-3 that you expect to be discharged in concentrations of 10 ppb or greater? ☒ Yes
	<u>7.12</u>	Do you expect acrolein, acrylonitrile, 2,4-dinitrophenol, or 2-methyl-4,6-dinitrophenol to be discharged in concentrations of 100 ppb or greater? ☐ Yes ☒ No → SKIP to Item 7.14.
	<u>7.13</u>	Have you provided quantitative data in Table C for the pollutants identified in Item 7.12 that you expect to be discharged in concentrations of 100 ppb or greater? ☐ Yes
	<u>7.14</u>	Have you provided quantitative data or an explanation in Table C for pollutants you expect to be present in the discharge at concentrations less than 10 ppb (or less than 100 ppb for the pollutants identified in Item 7.12)? ☒ Yes
<u>7.15</u>	Do you know or have reason to believe any pollutants in Exhibit 2F-4 are present in the discharge? ☐ Yes ☒ No → SKIP to Item 7.17.	

EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility Name Mobile Energy LLC
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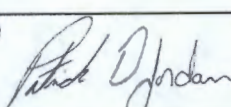
OMB No. 2040-0004
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Discharge Information Continued	7.16	Have you listed pollutants in Exhibit 2F-4 that you know or believe to be present in the discharge and provided an explanation in Table C?		
		☐ Yes		
	7.17	Have you provided information for the storm event(s) sampled in Table D?		
		☐ Yes		
	Used or Manufactured Toxics			
	7.18	Is any pollutant listed on Exhibits 2F-2 through 2F-4 a substance or a component of a substance used or manufactured as an intermediate or final product or byproduct?		
	☐ Yes	☒ No → SKIP to Section 8.		
Discharge Information Continued	7.19	List the pollutants below, including TCDD if applicable. Attach additional sheets, if necessary.		
	1.	4.	7.	
	2.	5.	8.	
	3.	6.	9.	
SECTION 8. BIOLOGICAL TOXICITY TESTING DATA (40 CFR 122.21(G)(11))				
Biological Toxicity Testing Data	8.1	Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last three years?		
		☐ Yes ☒ No → SKIP to Section 9.		
	8.2	Identify the tests and their purposes below.		
		Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?
				☐ Yes ☐ No
				☐ Yes ☐ No
			☐ Yes ☐ No	
SECTION 9. CONTRACT ANALYSIS INFORMATION (40 CFR 122.21(G)(12))				
Contract Analysis Information	9.1	Were any of the analyses reported in Section 7 (in Tables A through C) performed by a contract laboratory or consulting firm?		
		☒ Yes ☐ No → SKIP to Section 10.		
	9.2	Provide information for each contract laboratory or consulting firm below.		
			Laboratory Number 1	Laboratory Number 2
	Name of laboratory/firm	Pace Analytical Servies	Pace Analytical Services	
	Laboratory address	173 Island Creek Road, Pikeville KY 41501	4320 Midmost Drive, Mobile AL 36609	
	Phone number	(606) 637-2726	(251) 344-9106	
Pollutant(s) analyzed	Kjeldahl N	O&G, TSS, BOD, N, P, COD		

EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility Name Mobile Energy LLC
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SECTION 10. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(A) AND (D))

Checklist and Certification Statement	<u>10.1</u>	In Column 1 below, mark the sections of Form 2F that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.	
		Column 1	Column 2
		☒ Section 1	☐ w/ attachments (e.g., responses for additional outfalls)
		☒ Section 2	☐ w/ attachments
		☒ Section 3	☒ w/ site drainage map
		☒ Section 4	☐ w/ attachments
		☒ Section 5	☐ w/ attachments
		☒ Section 6	☐ w/ attachments
		☒ Section 7	☒ Table A ☐ w/ small business exemption request ☒ Table B ☐ w/ analytical results as an attachment ☒ Table C ☒ Table D
		☒ Section 8	☐ w/ attachments
		☒ Section 9	☐ w/ attachments (e.g., responses for additional contact laboratories or firms)
		☒ Section 10	
	<u>10.2</u>	Provide the following certification. (See instructions to determine the appropriate person to sign the application.)	
		Certification Statement <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) Patrick Jordan	Official title Facility Manager	
	Signature 	Date signed Nov 4, 2025	

EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility Name Mobile Energy LLC	Outfall Number DSN002
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TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETERS (40 CFR 122.26(C)(1)(i)(E)(3))¹

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

Pollutant or Parameter		Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
1.	Oil and grease	< 5.4 mg/L		<5.2 mg/L		7	
2.	Biochemical oxygen demand (BOD ₅)	< 6.0 mg/L	N/A	<6.0 mg/L	N/A	1	
3.	Chemical oxygen demand (COD)	177 mg/L	N/A	70.9 mg/L	N/A	7	
4.	Total suspended solids (TSS)	165 mg/L	N/A	60.7 mg/L	N/A	7	
5.	Total phosphorus	<0.10 mg/L	N/A	<0.10 mg/L	N/A	1	
6.	Total Kjeldahl nitrogen (TKN)	4.04 mg/L	N/A	4.04 mg/L	N/A	1	
7.	Total nitrogen (as N)	4.3 mg/L	N/A	4.3 mg/L	N/A	1	
8.	pH (minimum)	6.15		7.37		7	
	pH (maximum)	8.47		7.37		7	

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

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EPA Identification Number ALR000014902	NPDES Permit Number AL0073229	Facility name Mobile Energy LLC	Outfall Number DSN002
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TABLE D. STORM EVENT INFORMATION (40 CFR 122.26(C)(1)(I)(E)(6))

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

Date of Storm Event	Duration of Storm Event (in hours)	Total Rainfall During Storm Event (in inches)	Number of Hours Between Beginning of Storm Measured and End of Previous Measurable Rain Event	Maximum Flow Rate During Rain Event (in gpm or specify units)	Total Flow from Rain Event (in gallons or specify units)

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

N/A - Permit requires grab sample only.

[illegible]MOORE, AL
2004

Hog Bayou Energy Center

Topographic Map and 1-Mile Radius



Legend

--- Property Boundary

Container Type

■ Bulk Storage Container

■ Oil Filled Equipment

■ Transformer

■ Additional Areas

- (A) CTG Transformer
- (B) STG Transformer
- (C) Station Auxillary Transformer
- (D) LCI Transformer
- (E) Exitation Transformer
- (F) CTG Hydraulic & Lube Oil Reservoir
- (G) STG Hydraulic & Lube Oil Reservoir
- (H) Fuel Oil Storage Tank (DECOMMISSIONED)
- (I) Diesel Fire Pump Storage Tank
- (J) Miscellaneous Oil in Material Storage Building
- (K) #2 Fuel Oil Unloading Area (Part of H)
- (L) #2 Fuel Oil Forwarding Equipment (Part of H)
- (M) Boiler Water Feed Pump Skids
- (N) Oil/Water Separator
- (O) Fire Pump Transformer
- (P) Temporary Storage (Not Shown)
- (Q) Miscellaneous Oil
- (R) Warehouse Power Supply Transformers

→ Drainage (Runoff) Direction

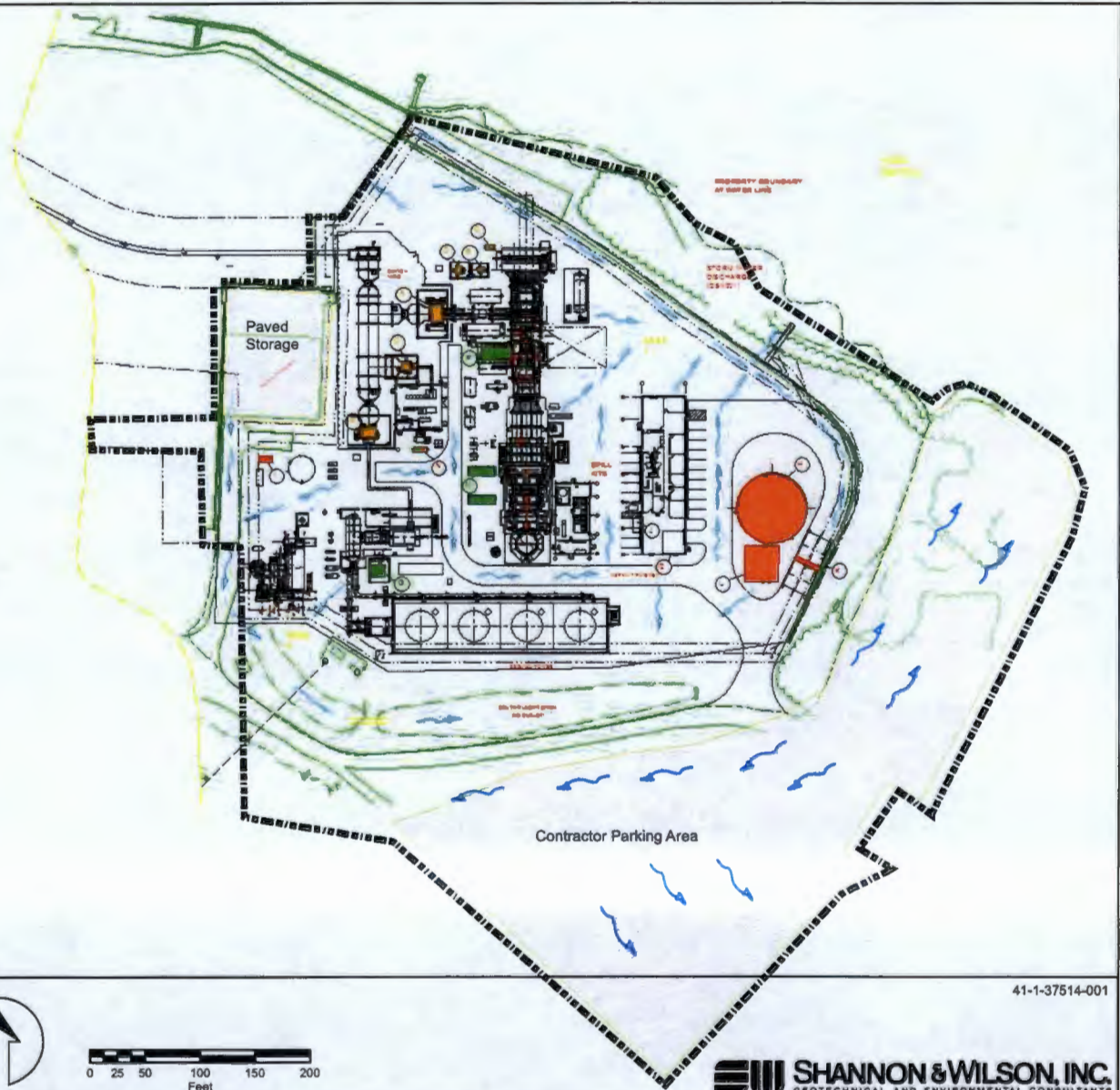


FIGURE 3

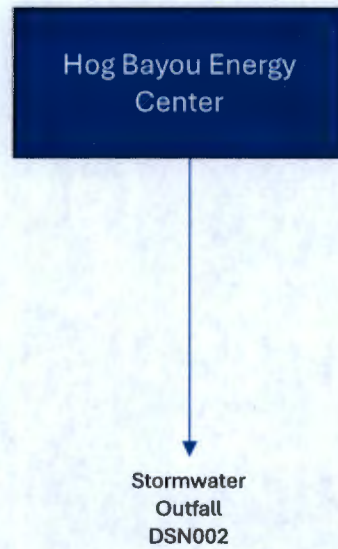
Facility Plot Plan & Flow Direction
SPCC Plan - Mobile Energy Center
Mobile, AL

October 2014

41-1-37514-001

SHANNON & WILSON, INC.
GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

Hog Bayou Energy Center – Stormwater Flow Schematic Diagram



Notes:

Stormwater is sampled manually through a semiannual grab sample. No sampling equipment is present at the facility.

Hog Bayou Energy Center Non-Stormwater Discharge Narrative Form 2F – Section 5

An engineering analysis consisting of the review of the facility's drainage schematics, a review of potential sources of non-stormwater discharges, a visual inspection of the facility, and a review of the containment areas and other controls used for the storage of materials at the facility was conducted at the commencement of commercial operations for the facility. It was determined that there are no non-stormwater discharges present that would exit the facility at Outfall DSN002S. There have been no process changes at the facility that would affect the presence of non-stormwater discharge since that initial analysis.

The facility is staffed 24 hours/day and the outfall is visually inspected twice per day. The facility is visually inspected every year to determine whether changes may have occurred that would affect the conclusion that there are no non-stormwater discharges present.

Hog Bayou Energy Center Chemical Additives SDS

Per guidance from ADEM, the SDS are not required to be submitted with this application since they will not be discharged into the stormwater outfall. Chemicals are only required to be listed in this application as they are present on site.

Chemical	Use	Chemical Composition			EPA Registration Number
		Hazardous Component	% Conc.	CAS	
Biosperse 244	Cooling Tower Biocide	2,2 DIBROMO-3-NITRILOPROPIONAMIDE POLYETHYLENE GLYCOL	20-30% 50-60%	10222-01-2 25322-68-3	74655-21
Biosperse CN4200	Cooling Tower Biocide	POLYETHYLENE GLYCOL 2,2 DIBROMO-3-NITRILOPROPIONAMIDE	50-60% 20-30%	25322-68-3 10222-01-2	74655-21
Sodium Hypochlorite	Cooling Tower Biocide	HYPOCHLORITE SOLUTION Caustic Soda	10-15% 1.5-5%	7681-52-9 1310-73-2	
Drewgard 315	ACW Inhibitor	Sodium Hydroxide Triazole Derivative	1-1.5% 1.5-5.0%	1310-73-2 254504001-5183	
Drewphos PT	HI/IP Drum pH/phosphate	Sodium Hydroxide	5-10%	1310-73-2	
Drewplus L-718	Cooling Tower Anti-foam	Alkoxylated Fatty Alcohol	5-10%	N/A	
Performax MX2702	Cooling Tower Inhibitor	Polymer Solution Phosphoric Acid Organic Acid	10-15% 1.5-5% 1-1.5%	26099-09-2 7664-38-2 N/A	
Amercor KB	Boiler LP Drum Corrosion Inhibitor	Ammonium Hydroxide Alkanolamine	10-15% 5-10%	1336-21-6 N/A	
Drewperse 7130	Dispersant	Ammonium Chloride	20-30%	254504001-6429	

Chemical	96-hr Median Tolerance Limit	Dose	Frequency of Use	Discharge Concentration
Biosperse 244	2.3 mg/L – Rainbow Trout 3.4 mg/L – Sheepshead Minnow	7.5 gal/week	Weekly as needed	No increase to permit limits
Biosperse CN4200	3.6 mg/L – Rainbow Trout 3.4 mg/L – Sheepshead Minnow	1 gal/day	Daily as needed	No increase to permit limits
Sodium Hypochlorite	125 mg/L – Western Mosquitofish 0.6 mg/L – Bluegill Sunfish 0.071 mg/L – Rainbow Trout 0.11 mg/L – Fathead Minnow	81 gal/day	Daily as needed	No increase to permit limits

Drewgard 315	173 mg/L – Bluegill Sunfish 25 mg/L – Rainbow Trout 125 mg/L – Western Mosquitofish	5 gal/year	Twice per year as needed	No increase to permit limits
Drewphos PT	7071 mg/L – Rainbow Trout 7033 mg/L – Fathead Minnow 125 mg/L – Western Mosquitofish	0.5 gal/day	Daily as needed	No increase to permit limits
Drewplus L-718	101.5 mg/L – Rainbow Trout 144.8 mg/L – Fathead Minnow	2 gal/year	Once yearly as needed	No increase to permit limits
Performax MX2702	1060 mg/L – Fathead Minnow	6.5 gal/day	Daily as needed	No increase to permit limits
Amercor KB	196 mg/L – Rainbow Trout 349 mg/L - Carp	5 gal/day	Daily as needed	No increase to permit limits
Drewperse 7130	0.7 mg/L – Rainbow Trout			No increase to permit limits

Delegation of Signatory Authority

Directions for Use:

1. This document may be used by a Responsible Official (as defined in 335-6-6-.09(1) or 335-6-5-.14(1)) to delegate signatory authority to an individual or position within an organization that has/have responsibility for the overall operation of the regulated facility or activity pursuant to the following regulations:

335-6-6-.09(2) [NPDES Permits]/335-6-5-.14(2) [State Indirect Discharge (SID) Permits]

All reports required by permits and other information requested by the Department shall be signed by a person described under paragraph 335-6-6-.09(1)/335-6-5-.14(1) or by a duly authorized representative of that person. **A person is a duly authorized representative only if:**

- (a) The authorization is made in writing by a person described in paragraph 335-6-6-.09(1)/335-6-5-.14(1);
 - (b) The authorization specifies either an individual or a position **having responsibility for the overall operation of the regulated facility or activity** and;
 - (c) The written authorization is submitted to the Department.
2. To sign this form as a Responsible Official, the person must be at a level of Vice President or higher, a Managing Member, a Partner, an Owner, or a Ranking Elected Official for the company/entity holding the permit or its parent company.
 3. All information requested must be provided.

A. Responsible Official (i.e. person delegating signatory rights):

Name	Title/Position	Company/Organization	Phone	Email
Michael Madia	Managing Director	Argo Infrastructure Partners	917-574-6353	Michael.Madia@ArgoIP.com

B. Duly Authorized Representative (i.e. individual(s) or position (s) being delegated signatory authority):

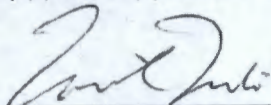
Name	Title/Position	Company/Organization	Phone	Email
Patrick Jordan	Facility Manager	Mobile Energy Center	251-287-9015	patrick.jordan@ethosenergy.com

C. NPDES or SID Permit Number(s) for which the delegation will apply (Note: if permit not issued yet, site name and location will suffice):

NPDES Permit No. AL0073229, SID Permit No. IU414900737

D. Certification:

I, the abovenamed Responsible Official, delegate the individual(s)/position(s) named above the authority to sign reports, notifications, and other information on my behalf for the permit(s)/site(s) listed above and certify that the individual(s)/position(s) named above has/have responsibility for the overall operation of the regulated facility or activity.



Sept. 30, 2025

Responsible Official's Signature

Date Signed

Note: If an individual or position listed above does NOT have responsibility for the overall operation of the regulated facility or activity, the delegation for that individual or position will NOT be honored by the Department. In addition, if the person signing this delegation does not meet the definition of Responsible Official in 335-6-6-.09(1) or 335-6-5-.14(1), this delegation will not be honored by the Department.