EDWARD F. POOLOS
DIRECTOR

JEFFERY W. KITCHENS
DEPUTY DIRECTOR

KAY IVEY
GOVERNOR

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Montgomery, Alabama 36130-1463
(334) 271-7700 ▪ FAX (334) 271-7950

OCT 2 2 2026

MR. CHRIS BUSHHORN
VICE PRESIDENT OF ADMINISTRATIVE SERVICES
PARKER TOWING, INC.
1001 3RD STREET
NORTHPORT, AL 35476

RE: DRAFT PERMIT
NPDES PERMIT NUMBER AL0084537

Dear Mr. Bushhorn:

Transmitted herein is a draft of the referenced permit.

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

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

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

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

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

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

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

Sincerely,

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

Enclosure: Draft Permit

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

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

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

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

Alabama Department of Environmental Management

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE: PARKER TOWING COMPANY, INC.

FACILITY LOCATION: BIRMINGHAM MARINE TERMINAL
8701 BIRMINGPORT RD
MULGA, ALABAMA 351189303
JEFFERSON COUNTY

PERMIT NUMBER: AL0084537

RECEIVING WATERS: DSN001 – DSN003: LOCUST FORK (BANKHEAD CREEK)

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

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:

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

DSN001Q, DSN002Q, & DSN003Q: Stormwater runoff associated with transportation operations including loading, unloading, and storage of bulk materials from barge operations, and petroleum storage and fueling areas 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) 5/ Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	9.0 Maximum Daily	S.U.	Quarterly	Grab	All Months
pH (00400) 6/ O - See Comments Below	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months
Solids, Total Suspended (00530) 5/ Effluent Gross Value	*****	*****	*****	*****	35 Monthly Average	70 Maximum Daily	mg/l	Quarterly	Grab	All Months
Solids, Total Suspended (00530) 6/ O - See Comments Below	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months
Nitrogen, Total (As N) (00600) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Nitrogen, Ammonia Total (As N) (00610) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Nitrite Plus Nitrate Dissolved 1 Det. (00631) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	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.

5/ Effluent limits for this parameter are only applicable during monitoring periods when coal is stored in this drainage area. If effluent limitations are not applicable during a monitoring period, *9 should be reported for this parameter on the eDMR.

6/ Monitoring results for this parameter should be reported during periods when coal is not stored in this drainage area. If coal is stored in this drainage area during a monitoring period, *9 should be reported for this parameter on the eDMR.

DSN001Q, DSN002Q, & DSN003Q (Continued): Stormwater runoff associated with transportation operations including loading, unloading, and storage of bulk materials from barge operations, and petroleum storage and fueling areas 3/

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

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Phosphorus, Total (As P) (00665) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Carbon, Tot Organic (TOC) (00680) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Arsenic, Total (As As) (01002) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Cadmium, Total (As Cd) (01027) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Copper, Total (As Cu) (01042) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Iron, Total (As Fe) (01045) 5/ Effluent Gross Value	*****	*****	*****	*****	3.0 Monthly Average	6.0 Maximum Daily	mg/l	Quarterly	Grab	All Months
Iron, Total (As Fe) (01045) 6/ O - See Comments Below	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months

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

5/ Effluent limits for this parameter are only applicable during monitoring periods when coal is stored in this drainage area. If effluent limitations are not applicable during a monitoring period, *9 should be reported for this parameter on the eDMR.

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DSN001Q, DSN002Q, & DSN003Q (Continued): Stormwater runoff associated with transportation operations including loading, unloading, and storage of bulk materials from barge operations, and petroleum storage and fueling areas 3/

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

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency[2]	Sample Type[1]	Seasonal
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Manganese, Total (As Mn) (01055) 5/ Effluent Gross Value	*****	*****	*****	*****	2.0 Monthly Average	4.0 Maximum Daily	mg/l	Quarterly	Grab	All Months
Manganese, Total (As Mn) (01055) 6/ O - See Comments Below	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Thallium, Total (As Tl) (01059) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Silver, Total (As Ag) (01077) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Selenium, Total (As Se) (01147) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	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.

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

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DSN001Q, DSN002Q, & DSN003Q (Continued): Stormwater runoff associated with transportation operations including loading, unloading, and storage of bulk materials from barge operations, and petroleum storage and fueling areas 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
Toluene (34010) Effluent Gross Value	*****	*****	*****	*****	*****	8723 Maximum Daily	ug/l	Quarterly	Grab	All Months
Benzene (34030) Effluent Gross Value	*****	*****	*****	*****	*****	15.5 Maximum Daily	ug/l	Quarterly	Grab	All Months
Ethylbenzene (34371) Effluent Gross Value	*****	*****	*****	*****	*****	1244 Maximum Daily	ug/l	Quarterly	Grab	All Months
Naphthalene (34696) Effluent Gross Value	*****	*****	*****	*****	*****	620 Maximum Daily	ug/l	Quarterly	Grab	All Months
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Estimate	All Months
Mercury, Total (As Hg) (71900) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months
Xylene (81551) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	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: October 20, 2026
PREPARED BY: Wayne Holt

Permittee Name: Parker Towing Company, Inc.

Facility Name: Birmingham Marine Terminal

Permit Number: AL0084537

PERMIT IS INITIAL ISSUANCE

DISCHARGE SERIAL NUMBERS (DSN) & DESCRIPTIONS:

DSN	Description
001 - 003	Stormwater runoff associated with transportation operations including loading, unloading, and storage of bulk materials from barge operations, and petroleum storage and fueling areas.

INDUSTRIAL CATEGORY: NON-CATEGORICAL

MAJOR: **No**

STREAM INFORMATION:

Receiving Stream:	Locust Fork (Bankhead Creek)
Classification:	Fish and Wildlife
River Basin:	Black Warrior
7Q10:	30.42 cfs
1Q10:	22.82 cfs
Annual Average Flow:	1926.31 cfs
303(d) List:	NO
Impairment:	N/A
TMDL:	YES (Nutrients)

DISCUSSION:

Birmingham Marine Terminal is a marine transportation and storage facility that loads, unloads, and stores bulk materials including finished steel products, refractory products, aggregate, grain, fertilizer, coal, and coal by-products. This permit only authorizes the discharge of stormwater from the site.

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 discharge to a Tier II water body. Therefore, anti-degradation requirements do not apply.

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.

DSN001Q – DSN003Q: Stormwater runoff associated with transportation operations including loading, unloading, and storage of bulk materials from barge operations, and petroleum storage and fueling areas

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency	Sample Type	Seasonal	Basis
pH (00400) Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	9.0 Maximum Daily	S.U.	Quarterly	Grab	All Months	BPJ
pH (00400) O - See Comments Below	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Quarterly	Grab	All Months	BPJ
Solids, Total Suspended (00530) Effluent Gross Value	*****	*****	*****	*****	35 Monthly Average	70 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Solids, Total Suspended (00530) O - See Comments Below	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Oil & Grease (00556) Effluent Gross Value	*****	*****	*****	*****	*****	15.0 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Nitrogen, Total (As N) (00600) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Nitrogen, Ammonia Total (As N) (00610) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Nitrite Plus Nitrate Dissolved 1 Det. (00631) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Phosphorus, Total (As P) (00665) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Carbon, Tot Organic (TOC) (00680) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Arsenic, Total (As As) (01002) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Cadmium, Total (As Cd) (01027) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Chromium, Total (As Cr) (01034) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Copper, Total (As Cu) (01042) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Iron, Total (As Fe) (01045) Effluent Gross Value	*****	*****	*****	*****	3.0 Monthly Average	6.0 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Iron, Total (As Fe) (01045) O - See Comments Below	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Lead, Total (As Pb) (01051) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Frequency	Sample Type	Seasonal	Basis
Manganese, Total (As Mn) (01055) Effluent Gross Value	*****	*****	*****	*****	2.0 Monthly Average	4.0 Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Manganese, Total (As Mn) (01055) O - See Comments Below	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Thallium, Total (As Tl) (01059) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Nickel, Total (As Ni) (01067) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Silver, Total (As Ag) (01077) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Zinc, Total (As Zn) (01092) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Selenium, Total (As Se) (01147) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Toluene (34010) Effluent Gross Value	*****	*****	*****	*****	*****	8723 Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
Benzene (34030) Effluent Gross Value	*****	*****	*****	*****	*****	15.5 Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
Ethylbenzene (34371) Effluent Gross Value	*****	*****	*****	*****	*****	1244 Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
Naphthalene (34696) Effluent Gross Value	*****	*****	*****	*****	*****	620 Maximum Daily	ug/l	Quarterly	Grab	All Months	BPJ
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	*****	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Quarterly	Estimate	All Months	BPJ
Mercury, Total (As Hg) (71900) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Chemical Oxygen Demand (COD) (81017) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Quarterly	Grab	All Months	BPJ
Xylene (81551) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Maximum Daily	ug/l	Quarterly	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

The facility indicated that bulk materials such as finished steel products, refractory products, aggregate, grain, fertilizer, coal, and coal by-products will be stored onsite. The pollutants proposed to be monitored could reasonably be expected to be present in stormwater discharges from the site based on contact with the storage of the above-listed materials or other materials similar in nature. This permit authorizes stormwater runoff in contact with only the above-listed materials and/or other materials similar in nature.

Best Professional Judgment (BPJ)

The parameters of concern for this facility are based on the activity type and data from the application. These parameters are consistent with similar facilities in the state and have been proven to be reflective of the operations at this facility.

pH

ADEM Administrative Code, Division 6 Regulations, specifically 335-6-10-.09(5)(e)2. – Specific Water Quality for Fish and Wildlife classified streams states: "Sewage, industrial waste or other wastes shall not cause the pH to deviate more than one unit from then normal or natural pH, nor be less than 6.0, nor greater than 8.5 standard units." Because discharges are only expected to occur during storm events, discharges are not expected to affect the pH of the receiving stream. Therefore, limitations of 6.0 to 9.0 s.u. (based on 40 CFR 434 Subpart B) are considered adequate to protect water quality and are proposed in this new issuance. pH limitations only apply when coal is unloaded, loaded, and/or stored onsite during a monitoring period.

Total Iron, Total Manganese, Total Suspended Solids (TSS)

Due to the storage of coal and coal by-products, limits for these parameters, which are based on 40 CFR 434 Subpart B (Coal Preparation Plants and Coal Preparation Plant Associated Areas), are being proposed in this new issuance. This subpart is not directly applicable to the operations at this site; however, the operations are similar enough that the limitations are believed to be appropriate and should ensure water quality is protected. Limitations are only applicable when coal is unloaded, loaded, and/or stored onsite during a monitoring period. Monitoring only requirements without limitations are applicable when coal is not onsite during a monitoring period. Footnotes have been placed in the permit to clarify reporting and monitoring requirements.

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.

Chemical Oxygen Demand (COD), Ammonia (as N), Phosphorus, Metals, Total Organic Carbon (TOC)

Monitoring has been proposed for these parameters based on the wide range of commodities handled at the facility to measure the effectiveness of the facility's BMPs.

Nitrite Plus Nitrate Dissolved 1 Det.

Based on the EPA Form 2F, the Permittee listed Nitrate-Nitrite as a pollutant that is present onsite. Monitoring requirements are imposed for all outfalls on a quarterly basis.

Benzene, Toluene, Ethylbenzene, Xylene, Naphthalene

Requirements for benzene, toluene, ethylbenzene, xylene and naphthalene have been proposed due to the presence of fueling areas and the bulk storage of petroleum in the drainage areas. Spills from petroleum handling areas have been shown to contain levels of organics, specifically naphthalene, benzene, toluene, ethyl benzene and xylene (BTEX). The proposed limitations for benzene, ethylbenzene, toluene and naphthalene have been applied based on BPJ and were developed based on the human health criteria and to ensure consistency with ADEM General Permit ALG340000.

303(d) List of Impaired Waters and Total Maximum Daily Load (TMDL)

The applicant is not proposing discharges into a stream segment or other State water that is included on Alabama's current CWA §303(d) list. However, the receiving stream has an established TMDL for nutrients (total phosphorus

and total nitrogen) Monitoring for total phosphorus and for total nitrogen are proposed for this permit to ensure the facility is not contributing to the impairment.

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).

Digitally signed by:
AEPACS
Date: 2026.02.19 10:35:36 -06:00
Reason: Submission Data
Location: State of Alabama

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

version 2.9

(Submission #: HQK-835H-90C5Y, version 1)

Details

Submission ID HQK-835H-90C5Y

Form Input

General Instructions

This form should be used to submit the required information for an Initial Issuance of an NPDES individual permit for Industrial Individual NPDES facilities.

Do NOT continue this form if you are applying for a Modification or Reissuance of an existing permit. If you have begun this form in error, please close this form and then delete the draft. If you need assistance to find the correct Mod/Reissue form, please contact your assigned permit contact.

Incomplete or incorrect answers or missing signatures will delay processing. Attach additional comments or information as needed. Commencement of activities applied for as detailed in this application are not authorized until permit coverage has been issued by the Department.

Please complete all required sections of the form.
For assistance, please click here to determine the permit staff responsible for the site or call (334) 271-7799

Processing Information

Form Submission Reason
New

Are you applying for a modification or reissuance of an EXISTING permit for industrial activity?
No

General Information

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

NPDES or General Permit Numbers (if applicable, please list all permit numbers):
ALG141144 and AL0078310

Select all discharge types that are applicable for this site/facility:
Stormwater Only Discharge

Permittee Information

Permittee

Permittee Name
Parker Towing Company, Inc.

Mailing Address
8701 BIRMINGPORT RD
MULGA, AL 35118-9303

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

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

Responsible Official

Prefix
Mr.

First Name	Last Name
Chris	Bushhorn

Title
Vice President of Administrative Services

Organization Name
Parker Towing, Inc.

Phone Type	Number	Extension
Business	2053911138	

Email
cbushhorn@parkertowing.com

Mailing Address
1001 3rd Street
Northport, AL 35476

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

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

Duly Authorized Representative (DAR)

Duly Authorized Representative - Delegation of Signatory Authority by Responsible Official

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

Delegation Document for Duly Authorized Representation (DAR)

Delegation Letter - Birmingham (Aaron Key)_signed.pdf - 02/09/2026 02:27 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
Leif	Key

Title
Port Manager

Organization Name
Parker Towing Company, Inc.

Phone Type	Number	Extension
Mobile	205-534-0745	

Email
akey@parkertowing.com

Mailing Address

8701 BIRMINGPORT RD

MULGA, AL 35118-9303

United States

Facility/Site Information

Facility/Site Name
Birmingham Marine Terminal

Organization/Ownership Type
Corporation

Facility/Site Address or Location Description

8701 BIRMINGPORT RD

MULGA, AL 35118-9303

Facility/Site County
Jefferson

Detailed Directions to the Facility/Site
Head north on Birmingport Road from Ergon, AL, once you cross Locust Fork, Powhatan Street will be on the right. You can access the site from Powhatan Street.

Facility Map

Figure 2 - Site Map.pdf - 02/10/2026 11:16 AM

Comment

NONE PROVIDED

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

Facility/Site Front Gate Latitude and Longitude
33.58887100000000,-87.10491000000000

8701 Birmingport Road, Mulga, AL

SIC Code(s) [Please enter Primary SIC Code first followed by any additional applicable SIC Codes]
4491-Marine Cargo Handling

NAICS Code(s) [Please enter Primary NAICS Code first followed by any additional applicable NAICS Codes]
488320-Marine Cargo Handling

Facility/Site Contact

Prefix
Mr.

First Name	Last Name
Leif	Key

Title
Port Manager

Organization Name
Parker Towing Company, Inc.

Phone Type	Number	Extension
Mobile	205-534-0745	

Email
akey@parkertowing.com

Address
8701 BIRMINGPORT RD
MULGA, AL 35118-9303

DMR Contact(s) (1 of 1)

DMR Contact

Prefix
Mr.

First Name	Last Name
Leif	Key

Title
Port Manager

Phone Type	Number	Extension
Mobile	205-534-0745	

Email
akey@parkertowing.com

Address
8701 BIRMINGPORT RD
MULGA, AL 35118-9303

Applicant Business Entity Information

Address of Incorporation
1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476

Agent Designated by the Corporation for Purposes of Service

Name	Address
Chris Bushhorn	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476

Please provide all corporate officers

Name	Title	Address
Tim Parker III	President/CEO	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476
Charles Haun III	Executive VP	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476

Name	Title	Address
Chris Bushhorn	VP of Admin. Services	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476
Tim Parker II	Chairman of the Board	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476
Charles Haun II	V. Chairman of the Board	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476
Charles F. Rabbit Jr.	VP Finance/Secretary	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476
Alice Parker Haun	Treasurer	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476
Dan Benken	VP Operations	1001 3rd Street, Northport, Tuscaloosa County, Alabama 35476

Does the applicant applying for coverage have a Parent Corporation?
No

Does the applicant applying for coverage have Subsidiary Corporations?
No

Enforcement History

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

Give a brief description of all operations at this facility including primary products or services:
The Birmingham Marine Terminal serves as an area for shipping/receiving and barge transfers as well as equipment maintenance and storage. Commodities include finished steel products, refractory products, aggregate, grain, fertilizer, and coal/coal by-products. The site also includes ground transportation in the arrival/departure of crew members from the site. The site has several enclosed warehouses, covered product and equipment storage, product transfer conveyors, product storage, one (1) barge loading/unloading dock and one (1) barge loading dock.

Stormwater Outfalls (1 of 3)

SW01

Outfall Identifier
SW01

Receiving Water
Locust Fork

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:
Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location
33.587034,-87.102078

Stormwater Outfalls (2 of 3)

SW02

Outfall Identifier
SW02

Receiving Water
Locust Fork

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:
Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location
33.58719,-87.104298

Stormwater Outfalls (3 of 3)

SW03

Outfall Identifier
SW03

Receiving Water
Locust Fork

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:
Stormwater only (no comingled process waste water excluding air conditioner condensate and fire testing waters)

Monitoring/Sampling Point Location
33.588216,-87.1075

Anti-Degradation Evaluation

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

Has an Anti-Degradation Analysis been previously conducted and submitted to the Department for the new or increased discharge referenced above?
No

NOTE

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

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

How much will the discharger be increasing employment (at its existing facility or as the result of locating a new facility)?
As of right now, no increased employment is planned; however, once the Individual Permit is issued, it will provide capacity for additional material storage resulting in increased business opportunities. The increased business opportunities may require increased employment.

How much reduction in employment will the discharger be avoiding?
There is no planned reduction in employment at this time.

How much additional state or local taxes will the discharger be paying?
Currently, Parker Towing Company, Inc. pays around $40,000 per year in property taxes for the Birmingham Marine Terminal. The new Individual Permit will drive business opportunities. Increased business opportunities will result in increased state and local sales tax for equipment purchases and additional state and local tax revenue.

What public service to the community will the discharger be providing?
Parker Towing Company, Inc. is involved with or makes donations to the below organizations. An * indicates both monetary donations and volunteer hours.

*United Way of West Alabama
*Adopt-A-School partners with Northridge middle school
*DCH Foundation
*Seamen&#65533;s Church Institute
University of Alabama
Tuscaloosa Chamber of Commerce
Alabama Wildlife Federation
Tuscaloosa County Fraternal Order of Police
Economic Development Partner
Girl Scouts of North-Central AL
Business Council of AL
Leadership Alabama
American Heart Association
WIMOs

Parker Towing Company, Inc. also donated to the Saban Center. This donation will provide STEAM activities for the Children of West Alabama. Following the generous donation, the park surrounding the Saban Center was named the Parker-Haun Park by the City of Tuscaloosa.

What economic or social benefit will the discharger be providing to the community?
Parker Towing Company, Inc. will be providing increased economic opportunities to surrounding industries and transportation companies. Local industries will be able to have easier access to their supplies/materials. This will also allow for increased road transportation opportunities for the local trucking companies.

Attach Form 311, Form 312, or Form 313
Form 311_FINAL_signed.pdf - 02/17/2026 10:34 AM
Form 313_FINAL.pdf - 02/17/2026 10:34 AM
Comment
NONE PROVIDED

Additional Information

Do you share an outfall with another facility?
No

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

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

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

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

Please describe the equipment below:
N/A

Please attach the process schematic with sampling equipment locations.
Figure 2 - Site Map.pdf - 02/10/2026 11:17 AM
Comment
NONE PROVIDED

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

Do you use biocides, corrosion inhibitors, or chemical additives in your cooling or blowdown water?
No

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:
Stormwater

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
EPA Form 1_FINAL.pdf - 02/17/2026 08:32 AM
Comment
NONE PROVIDED

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

EPA Form 2F_FINAL.pdf - 02/17/2026 08:32 AM

Comment

NONE PROVIDED

Other attachments (as needed)

NONE PROVIDED

Comment

NONE PROVIDED

Additional Attachments

Please attach any additional information as needed.

BMP Plan_FINAL.pdf - 02/18/2026 11:11 AM

BMT - SPCC Plan_FINAL.pdf - 02/18/2026 11:13 AM

Comment

NONE PROVIDED

Application Preparer

Application Preparer

Prefix
Ms.

First Name	Last Name
Shelley	Gordon

Title
Project Professional

Organization Name
TTL, Inc.

Phone Type	Number	Extension
Mobile	205-200-0577	

Email
sgordon@ttlusa.com

Address
3200 RICE MINE RD NE
TUSCALOOSA, AL 35406-1510

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 thet all analyses reported as less than detectable in this application or attachments thereto were performed using the EPA approved test method having the lowest detection limit for the substance tested."

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

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

Signed By William Sledge on 02/19/2026 at 10:28 AM

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
		Birmingham Marine Terminal	

Form 1 NPDES

EPA

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

GENERAL INFORMATION

SECTION 1. ACTIVITIES REQUIRING AN NPDES PERMIT (40 CFR 122.21(F) AND (F)(1))

Activities Requiring an NPDES Permit

1.1 Applicants *Not Required* to Submit Form 1

1.1.1	Is the facility a new or existing **publicly owned treatment works** 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. ☑ No	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. ☑ No

1.2 Applicants *Required* to Submit Form 1

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

2.1 Facility Name

Birmingham Marine Terminal

2.2 EPA Identification Number

2.3 Facility Contact

Name (first and last)	Title	Phone number
Aaron Key	Port Manager	(205) 534-0745

Email address

akey@parkertowing.com

Name, Mailing Address, and Location Continued

2.4 Facility Mailing Address

Street or P.O. box		
8701 Birmingport Rd		
City or town	**State**	**ZIP code**
Mulga	Alabama	35118

2.5 Facility Location

Street, route number, or other specific identifier		
8701 Birmingport Rd		
County name	**County code (if known)**	
Jefferson	073	
City or town	**State**	**ZIP code**
Mulga	Alabama	35118

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

SIC and NAICS Codes

3.1

SIC Code(s)	Description (optional)
4491	Marine Cargo Operations

3.2

NAICS Code(s)	Description (optional)
488320	Marine Cargo Handling

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

Operator Information

4.1 Name of Operator

Parker Towing Company, Inc.

4.2 Is the name you listed in Item 4.1 also the owner?

☑ Yes ☐ No

4.3 Operator Status

☐ Public—federal ☐ Public—state ☐ Other public (specify)_____

☑ Private ☐ Other (specify) _____

4.4 Phone Number of Operator

(205) 349-1677

Operator Information Continued

4.5 **Operator Address**

Street or P.O. Box

P.O. Box 20908

City or town	State	ZIP code
Tuscaloosa	Alabama	35402

Email address of operator

cbushhorn@parkertowing.com

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) ALG141144 & AL0078310	☐ RCRA (hazardous wastes)	☐ UIC (underground injection of fluids)
☐ PSD (air emissions)	☐ Nonattainment program (CAA)	☐ NESHAPs (CAA)
☐ Ocean dumping (MPRSA)	☐ Dredge or fill (CWA Section 404)	☐ Other (specify)

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.

The operations at BMT consist of:

• Barge Loading and Unloading - Most materials are transferred directly from barge to truck; however, the Port also provides on-site storage for materials awaiting shipment. Materials commonly handled include finished steel products, refractory products, aggregates, fertilizers, coal and coal by-products, and grain.

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.)

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
		Birmingham Marine Terminal	

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

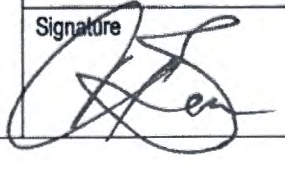
11.1 In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.

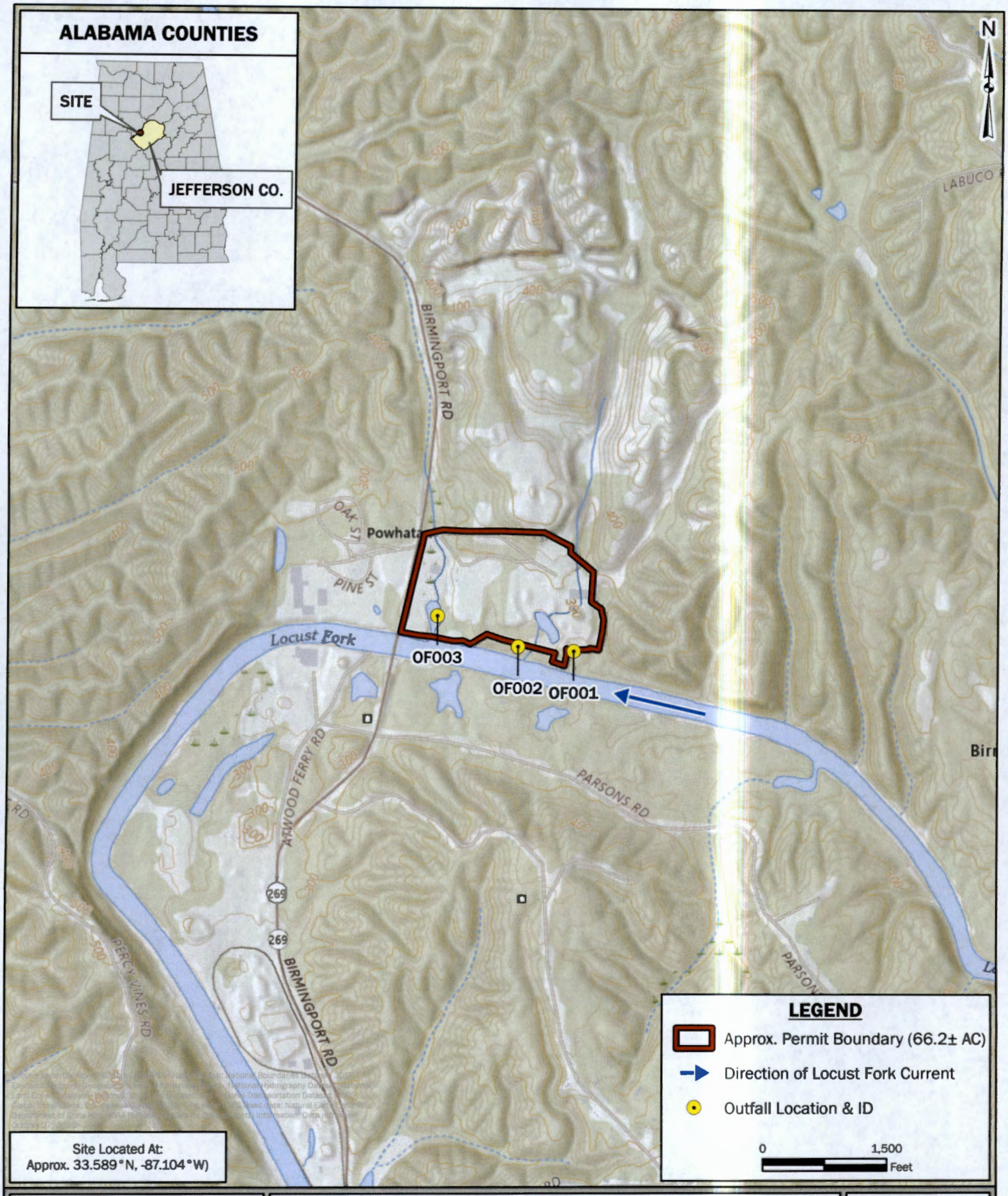
Column 1	Column 2
☑ Section 1: Activities Requiring an NPDES Permit	☐ w/ attachments
☑ Section 2: Name, Mailing Address, and Location	☐ w/ attachments
☑ Section 3: SIC Codes	☐ w/ attachments
☑ Section 4: Operator Information	☐ w/ attachments
☑ Section 5: Indian Land	☐ w/ attachments
☑ Section 6: Existing 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 certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (print or type first and last name)	Official title
Chris Bushhorn	VP of Administrative Services
Signature 	Date signed 2/16/26



TTL

EPA FORM 1 - SECTION 7 ATTACHMENT: MAP

PARKER TOWING COMPANY, INC.
BIRMINGHAM MARINE TERMINAL
MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: USA Topo Maps (See Service Layer Credits).

DRAWN BY:	SG
CHECKED BY:	SGR
DRAWING DATE:	02/09/2026
REVISION DATE:	N/A
TTL JOB NO.:	20-01-01599.25
APPROX. SCALE:	1 in = 1,500 ft



TTL

FIGURE 2: SITE MAP

PARKER TOWING COMPANY, INC.
BIRMINGHAM MARINE TERMINAL
MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: Google Earth Satellite Imagery, 02/28/2025.

DRAWN BY: SG
CHECKED BY: SGR
DRAWING DATE: 02/10/2026
REVISION DATE: N/A
TTL JOB NO.: 20-01-01599.25
APPROX. SCALE: 1 in = 350 ft

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
		Birmingham Marine Terminal	

Form 2F NPDES

EPA

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

STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY

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

Outfall Location

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

Outfall Number	Receiving Water Name	Latitude	Longitude
OF001	Locust Fork	33.587034	-87.102078
OF002	Locust Fork	33.58719	-87.104298
OF003	Locust Fork	33.588216	-87.1075

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

Improvements

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

☐ Yes ☑ No ➔ SKIP to Section 3.

2.2 Briefly identify each applicable project in the table below.

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

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

☐ Yes ☑ No

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
		Birmingham Marine Terminal	

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

Site Drainage Map

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

☑ Yes

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

Pollutant Sources

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

Outfall Number	Impervious Surface Area (within a mile radius of the facility)		Total Surface Area Drained (within a mile radius of the facility)	
OF001	0.5	specify units: AC	283.4	specify units: AC
OF002	0.2	specify units: AC	250.3	specify units: AC
OF003	0.7	specify units: AC	9.4	specify units: AC
		specify units		specify units
		specify units		specify units
		specify units		specify units

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

The significant materials located at the Birmingham Marine Terminal are:
Finished Steel Products (e.g. steel coils)
Refractory Products (e.g. direct reduced iron (DRI), Ferrochrome, pig iron, etc.)
Aggregate (e.g. sand, limestone, etc.)
Grain (e.g. soy beans, wheat, corn, etc.)
Fertilizer (e.g. potash, urea, salt, ammonia sulgate, etc.)
Coal and Coal By-Products (t.g. anthracite coal, coke breeze, etc.)

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

Stormwater Treatment		
Outfall Number	Control Measures and Treatment	Codes from Exhibit 2F–1 (list)
OF001	detention pond, vegetation	
OF002	detention pond, vegetation, grassy berm	
OF003	vegetation, grassy berm, earthen berm	

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

Non-Stormwater Discharges

5.1 Provide the following certification. (See instructions to determine the appropriate person to sign the application.)

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

Name (print or type first and last name)	Official title
Chris Bushhorn	VP of Administrative Services
Signature	**Date signed**

5.2 Provide the testing information requested in the table below.

Outfall Number	Description of Testing Method Used	Date(s) of Testing	Onsite Drainage Points Directly Observed During Test
ALL	Visual Observations	01/07/2026	ALL

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

Significant Leaks or Spills

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

N/A

SECTION 7. DISCHARGE INFORMATION (40 CFR 122.26(C)(1)(I)(E))

Discharge Information

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

7.1 Is this a new source or new discharge?

☐ Yes ➔ See instructions regarding submission of *estimated* data.

☑ No ➔ See instructions regarding submission of *actual* data.

Tables A, B, C, and D

7.2 Have you completed Table A for each outfall?

☑ Yes

Discharge Information Continued

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

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.

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?	Date Submitted
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

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

Contract Analysis Information

9.1 Were any of the analyses reported in Section 7 (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	Laboratory Number 3
Name of laboratory/firm	Waypoint Analytical		
Laboratory address	2790 Whitten Road Memphis, TN 38113		
Phone number	(901) 213-2400		
Pollutant(s) analyzed	Oil & Grease, Total Phosphorus, Nitrate-Nitrite, TKN, Total Nitrogen		

EPA Identification Number	NPDES Permit Number	Facility Name	OMB No. 2040-0004 Expires 07/31/2026
		Birmingham Marine Terminal	

SECTION 10. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(A) AND (D))

Checklist and Certification Statement

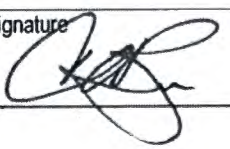
10.1 In Column 1 below, mark the sections of Form 2F that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or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

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

10.2 Provide the following certification. (See instructions to determine the appropriate person to sign the application.)

Certification Statement

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

Name (print or type first and last name)	Official title
Chris Bushhorn	VP of Administrative Services
Signature 	Date signed 2/16/26

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF001

OMB No. 2040-0004
Expires 07/31/2026

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	Non-Detect		Non-Detect		1	5
2.	Biochemical oxygen demand (BOD_5)	N/A	N/A	N/A	N/A	N/A	N/A
3.	Chemical oxygen demand (COD)	N/A	N/A	N/A	N/A	N/A	N/A
4.	Total suspended solids (TSS)	N/A	N/A	N/A	N/A	N/A	N/A
5.	Total phosphorus	Non-Detect	N/A	Non-Detect	N/A	1	3
6.	Total Kjeldahl nitrogen (TKN)	1.31 mg/l	N/A	1.31 mg/l	N/A	1	5
7.	Total nitrogen (as N)	1.56 mg/l	N/A	1.56 mg/l	N/A	1	5
8.	pH (minimum)	N/A		N/A		N/A	N/A
	pH (maximum)	N/A		N/A		N/A	N/A

[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).

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF002

OMB No. 2040-0004
Expires 07/31/2026

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	Non-Detect		Non-Detect		1	5
2.	Biochemical oxygen demand (BOD_5)	N/A	N/A	N/A	N/A	N/A	N/A
3.	Chemical oxygen demand (COD)	N/A	N/A	N/A	N/A	N/A	N/A
4.	Total suspended solids (TSS)	N/A	N/A	N/A	N/A	N/A	N/A
5.	Total phosphorus	Non-Detect	N/A	Non-Detect	N/A	1	3
6.	Total Kjeldahl nitrogen (TKN)	1.31 mg/l	N/A	1.31 mg/l	N/A	1	5
7.	Total nitrogen (as N)	1.56 mg/l	N/A	1.56 mg/l	N/A	1	5
8.	pH (minimum)	N/A		N/A		N/A	N/A
	pH (maximum)	N/A		N/A		N/A	N/A

[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).

3 - The results from Total phosphorus were obtained from the Parker Towing Company, Inc. (Tuscaloosa County Riverport), that has similar activities within the drainage area.

5 - The results from these parameters were obtained from OF003 at the existing facility with similar activities within the drainage area. OF002 has never discharged under the existing AL0078310 ADEM NPDES Individual Mining Permit.

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF003

OMB No. 2040-0004
Expires 07/31/2026

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	Non-Detect		Non-Detect		1	N/A
2.	Biochemical oxygen demand (BOD_5)	N/A	N/A	N/A	N/A	N/A	N/A
3.	Chemical oxygen demand (COD)	N/A	N/A	N/A	N/A	N/A	N/A
4.	Total suspended solids (TSS)	N/A	N/A	N/A	N/A	N/A	N/A
5.	Total phosphorus	Non-Detect	N/A	Non-Detect	N/A	1	3
6.	Total Kjeldahl nitrogen (TKN)	1.31 mg/l	N/A	1.31 mg/l	N/A	1	N/A
7.	Total nitrogen (as N)	1.56 mg/l	N/A	1.56 mg/l	N/A	1	N/A
8.	pH (minimum)	N/A		N/A		N/A	N/A
	pH (maximum)	N/A		N/A		N/A	N/A

[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).

3 - The results from Total phosphorus were obtained from the Parker Towing Company, Inc. (Tuscaloosa County Riverport), that has similar activities within the drainage area.

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EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF001

OMB No. 2040-0004
Expires 07/31/2026

TABLE B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.26(C)(1)(I)(E)(4) AND 40 CFR 122.21(G)(7)(VI)(A))[1]

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

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		

[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).

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF002

OMB No. 2040-0004
Expires 07/31/2026

TABLE B. CERTAIN CONVENTIONAL, AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.26(C)(1)(I)(E)(4) AND 40 CFR 122.21(G)(7)(VI)(A))[1]

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

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		

[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).

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF003

OMB No. 2040-0004
Expires 07/31/2026

TABLE B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.26(C)(1)(I)(E)(4) AND 40 CFR 122.21(G)(7)(VI)(A))[1]

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

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		

[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).

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF002

OMB No. 2040-0004
Expires 07/31/2026

TABLE C. TOXIC POLLUTANTS, CERTAIN HAZARDOUS SUBSTANCES, AND ASBESTOS (40 CFR 122.26(C)(1)(I)(E)(4) AND 40 CFR 122.21(G)(7)(VI)(B) AND (VII))[1]

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

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
Nitrate-Nitrite	0.250 mg/l	N/A	0.250 mg/l	N/A	1	5
Total Nitrogen	1.56 mg/l	N/A	1.56 mg/l	N/A	1	5

[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).

5 - The results from these parameters were obtained from OF003 at the existing facility with similar activities within the drainage area. OF002 has never discharged under the existing AL0078310 ADEM NPDES Individual Mining Permit.

EPA Identification Number	NPDES Permit Number	Facility Name	Outfall Number
		Birmingham Marine Terminal	OF003

OMB No. 2040-0004
Expires 07/31/2026

TABLE C. TOXIC POLLUTANTS, CERTAIN HAZARDOUS SUBSTANCES, AND ASBESTOS (40 CFR 122.26(C)(1)(I)(E)(4) AND 40 CFR 122.21(G)(7)(VI)(B) AND (VII))[1]

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

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
Nitrate-Nitrite	0.250 mg/l	N/A	0.250 mg/l	N/A	1	N/A
Total Nitrogen	1.56 mg/l	N/A	1.56 mg/l	N/A	1	N/A

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

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EPA Identification Number	NPDES Permit Number	Facility name	Outfall Number
		Birmingham Marine Terminal	OF001, OF002, & OF003

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)
10/29/2025	2	0.50	72	46.7 gpm	0.056 MGD

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

This storm event was used for determining the values for Nitrate-Nitrite and Total Nitrogen for outfalls OF001, OF002, and OF003.

Rational Method

EPA Identification Number	NPDES Permit Number	Facility name	Outfall Number
		Birmingham Marine Terminal	OF001, OF002, & OF003

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)
01/27/2025	2	0.57	168	63.4 gpm	0.076 MGD

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

This storm event was used for determining the values for Phosphorus on Table A for outfalls OF001, OF002, and OF003.

Rational Method



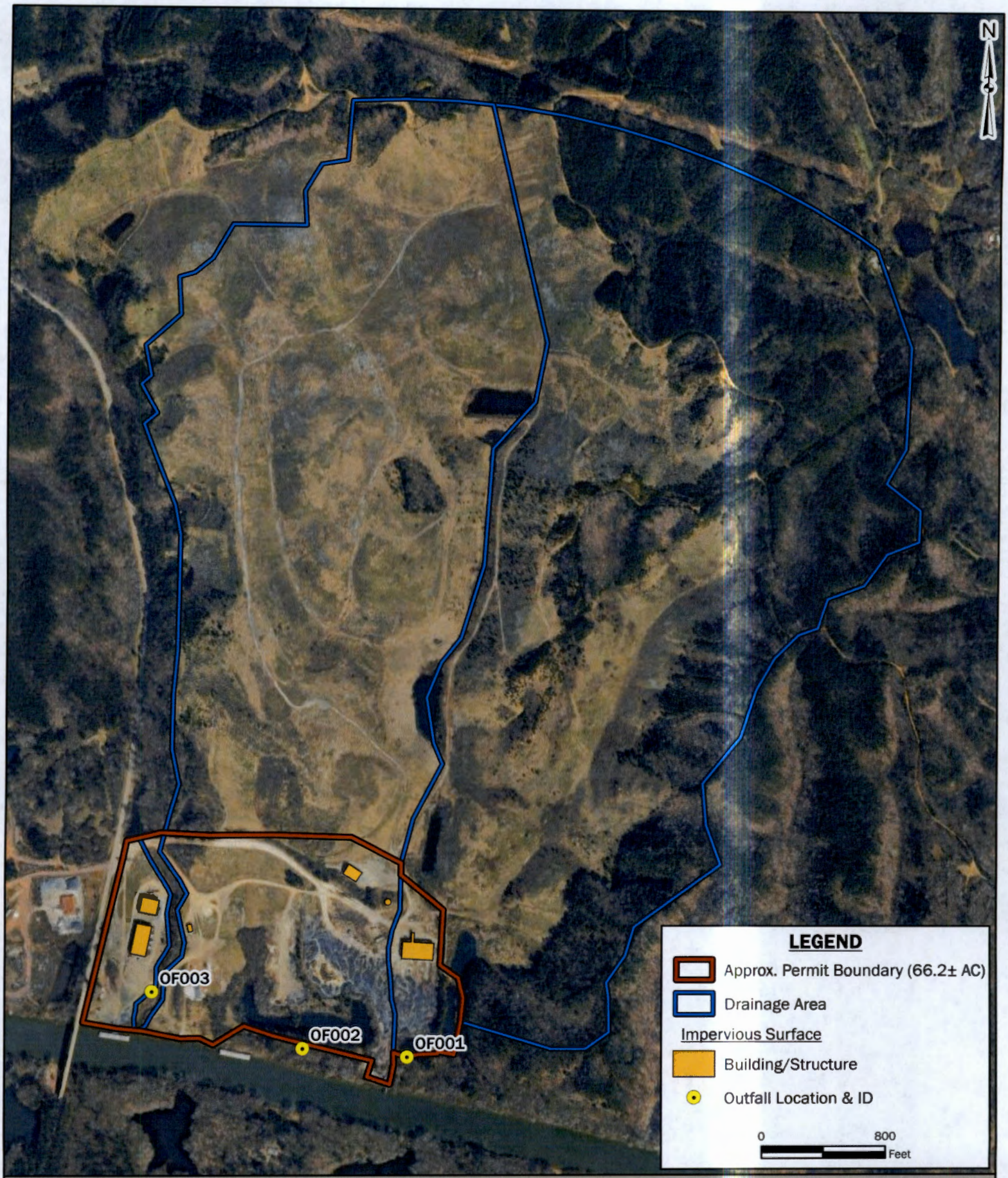
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EPA FORM 2F - SECTION 3.1A: OUTFALL & WATERBODY MAP

PARKER TOWING COMPANY, INC. - BIRMINGHAM MARINE TERMINAL
MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: Google Earth Satellite Imagery. 02/28/2025.

DRAWN BY: SG
CHECKED BY: SGR
DRAWING DATE: 02/09/2026
REVISION DATE: N/A
TTL JOB NO.: 20-01-01599.25
APPROX. SCALE: 1 in = 350 ft



TTL

EPA FORM 2F - SECTION 3.1B: DRAINAGE AREAS & IMPERVIOUS SURFACES

PARKER TOWING COMPANY, INC. - BIRMINGHAM MARINE TERMINAL

MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: Google Earth Satellite Imagery, 02/28/2025.

DRAWN BY: SG
CHECKED BY: SGR
DRAWING DATE: 02/09/2026
REVISION DATE: N/A
TTL JOB NO.: 20-01-01599.25
APPROX. SCALE: 1 in = 800 ft



TTL

EPA FORM 2F - SECTION 3.1C: EROSION CONTROL MEASURES & OUTDOOR STORAGE

PARKER TOWING COMPANY, INC. - BIRMINGHAM MARINE TERMINAL

MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: Google Earth Satellite Imagery, 02/28/2025.

DRAWN BY: SG
CHECKED BY: SGR
DRAWING DATE: 02/09/2026
REVISION DATE: N/A
TTL JOB NO.: 20-01-01599.25
APPROX. SCALE: 1 in = 350 ft

Attachment 1 to Supplementary Form
ADEM Form 311

Alternatives Analysis

Applicant/Project: Birmingham Marine Terminal

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

Alternative	Viable	Non-Viable	Comment
1 Land Application		x	See Supplemental Information
2 Pretreatment/Discharge to POTW		x	See Supplemental Information
3 Relocation of Discharge		x	See Supplemental Information
4 Reuse/Recycle		x	See Supplemental Information
5 Process/Treatment Alternatives		x	See Supplemental Information
6 On-site/Sub-surface Disposal		x	See Supplemental Information
(other project-specific alternatives considered by the applicant; attach additional sheets if necessary)			
7			
8			
9			

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

Signature: Sheryle Reeves *(Professional Engineer)*

Date: February 17, 2026

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

Supplement to:

Attachment to Supplementary Form – ADEM Form 311 – Alternatives Analysis

Birmingham Marine Terminal

Alternative	Viable	Non-Viable	Comment
1 Land Application		X	Discharges are from stormwater; therefore, land application is not applicable.
2 Pretreatment/ Discharge to POTW		X	Discharges are from stormwater; therefore, pretreatment/discharge to POTW is not applicable.
3 Relocation of Discharge		X	The Birmingham Marine Terminal is an existing facility that is currently permitted under ALG141144 and AL0078310 and has an existing detention ponds. Relocation of the detention ponds and subsequent outfalls is cost prohibitive.
4 Reuse/Recycle		X	Discharges are from stormwater; therefore, reuse/recycle is not applicable.
5 Process/Treatment Alternatives		X	Discharges are from stormwater; therefore, process/treatment alternatives is not applicable.
6 On-site/Sub-surface Disposal		X	Discharges are from stormwater; therefore, on-site/sub-surface disposal is not applicable.

Calculation of Total Annualized Project Costs
for Private-Sector Projects

Capital Costs to be Financed (Supplied by applicant)	$ 0 (1)
Interest rate for Financing (Expressed as a decimal)	0 (i)
Time Period of Financing (Assume 10 years*)	10 years (n)
Annualization Factor = $\frac{i}{(1+i)^{10} - 1} + i$	0 (2)
Annualized Capital Cost [Calculate: (1) x (2)]	$ 0 (3)
Annual Cost of Operation and Maintenance (including but not limited to monitoring, inspection, permitting fees, waste disposal charges, repair, administration and replacement)**	$ 20,000 (4)
Total Annual Cost of Pollution Control Project [(3) + (4)]	$ 20,000 (5)

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

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

PARKER TOWING

Parker Towing Company, Inc.
P.O. Box 20908 Tuscaloosa, Alabama 35402-0908
205-349-1677 | FAX 205-758-0061
www.parkertowing.com

Designation of Duly Authorized Representative

As outlined in Alabama Department of Environmental Management Administrative Code Rule 335-6-6-.09; I, Grady Coble, the Responsible Official for the facility known as Birmingham Marine Terminal, 8701 Birmingport Road, Mulga, Jefferson County, Alabama do hereby designate the position of Port Manager (Aaron Key) as a Duly Authorized Representative (DAR) for the purpose of signing reports, NOIs, non-compliance reports, or any other document required by the NPDES General Permit for stormwater discharges. This authorization is made in accordance with the certification statement below:

> "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."

Signature of Responsible Official

2/8/2023
Date

Vice President, Ports & Terminals
Position Title

205-561-8020
Phone Number

gcoble@parkertowing.com
Email Address

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) PLAN

BIRMINGHAM
MARINE TERMINAL
A Parker Towing Facility

8701 Birmingport Road
Mulga, Jefferson County, Alabama

Prepared For:

Parker Towing Co., Inc.
Attn: Will Sledge c/o Aaron Key
P.O. Box 20908 Tuscaloosa, AL 35402

Prepared By:

TTL
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SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) PLAN

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

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Spill Prevention, Control, and Countermeasure (SPCC) Plan
Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

General Applicability and Requirement to Prepare and Implement an SPCC Plan

40 CFR 112.1 and 112.3(a) and (b)
Parker Towing Company, Inc. operates the Birmingham Marine Terminal (BMT) located in Mulga, which is in Jefferson County, Alabama, at coordinates 33.589°N, -87.104° W. The approximately 66.2-acre facility is situated east of Birmingport Road and north of Locust Fork. The site is located in the South ½ of Section 6, Township 17 South Range 5 West, as shown on the 2018 Sylvan Springs, Alabama, U. S. G. S., 7.5-minute topographic map. Parker Towing Company, Inc. operates the BMT, which is a barge loading facility. A site location and topographic map, labeled as Figure 1, and a Site Map, labeled as Figure 2, are provided in Appendix A.

The provisions of 40 CFR Part 112 require that a Spill Prevention, Control, and Countermeasure (SPCC) Plan be prepared if a facility has 42,000 gallons or more of buried underground storage, or 1,320 gallons of total storage in aboveground tanks that have a capacity of 55 gallons or greater. The regulations state that the name, type, and location of the facility; date of initial operation; name and address of the owner; a designated person responsible for oil spill prevention; management approval; oil spill history; professional engineer certification; spill potential analysis; five-year management review; and Plan amendments must be included in the SPCC Plan (Plan). In addition to these required elements, the Plan should provide for the following: secondary containment; facility drainage; release prevention and cleanup; regular inspections and recordkeeping; facility security; and personnel training.

This Plan was prepared based on the provisions of 40 CFR 112- Oil Pollution Prevention, most recently amended April 18, 2011, and is intended to meet those requirements. At least every five years, this Plan must be evaluated to determine if new 'field-proven' technologies might decrease the potential for a petroleum release. Also, the Plan must be updated whenever there is a change in facility design, operation, or maintenance that would affect the potential for a petroleum release. A registered professional engineer must certify the Plan each time it is updated or modified with technical amendments described below in the section entitled "In-House Amendments of the SPCC Plan – 40 CFR 112.5".

Definitions

40 CFR 112.2
See Appendix B.

Professional Engineer Certification

40 CFR 112.3 (d)
See Appendix C.

Location of SPCC Plan

40 CFR 112.3 (e)

Federal regulations require that a complete copy of this Plan be maintained at BMT, and that the Plan be available to representatives of the U.S. Environmental Protection Agency (EPA) or Alabama Department of Environmental Management (ADEM) for on-site review during normal working hours.

Regulator's Review and/or Amendment of the SPCC Plan

40 CFR 112.4

A SPCC Plan is not required to be filed with the U.S. EPA under normal circumstances. However, the SPCC Plan must be submitted to the U.S. EPA Region IV Regional Administrator and to the ADEM if either of the following circumstances occurs:

1. The facility discharges more than 1,000 gallons of oil; or
2. The facility discharges more than 42 gallons of oil in each of two discharge events within any 12-month period.

If either of these discharge thresholds is exceeded, a copy of this SPCC Plan must be submitted to the EPA Regional Administrator and to the ADEM within 60 days of the discharge, along with information outlined below:

(1) Name of the facility: Birmingham Marine Terminal
(2) Your name:
(3) Location of the facility: 8701 Birmingport Road, Mulga, Alabama
(4) Maximum storage or handling capacity of the facility and normal daily throughput;
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
(7) The cause of such discharge as described in §112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

If the EPA Regional Administrator requires amendments to the SPCC Plan, the office of the Regional Administrator will notify Parker Towing Company, Inc.

Please note that if a discharge of any quantity breaches secondary containment and results in a spill onto protected waters of the state, an initial telephone notification to the National Response Center (NRC), the ADEM, and other agencies specified in 40 CFR 112.7(a)(3)(vi) is required. Additional written reporting requirements, beyond those of the telephone notification, are detailed in a subsequent section of this Plan.

In-House Amendments of the SPCC Plan

40 CFR 112.5

In accordance with 40 CFR 112.5, a review and evaluation of this SPCC Plan must be performed at any time that there is a change in the design, construction, operation, or maintenance that materially affects the potential for a discharge of petroleum products. Even if there are no changes in design, construction, operation, or maintenance, a review and evaluation of the Plan must be conducted at least once every five years. If any amendments are needed, they must be made and implemented within six months of the review. If any technical amendments are required for the Plan, the changes require the certification of a professional engineer. Technical amendments exclude such administrative changes as updates to the contact list; telephone numbers; product changes if the new product is compatible with conditions in the existing tank and secondary containment; and, any other changes which do not materially affect the facility's potential to discharge oil. If the owner or operator is not sure whether the change is technical or non-technical, the Plan should be certified by a professional engineer. These reviews and evaluations shall be recorded on the form found in Appendix D.

40 CFR 112.6 – Reserved

Spill Prevention, Control, and Countermeasure Plan Management Approval

40 CFR 112.7

The SPCC Plan regulations (40 CFR 112) require the owners/operators of BMT facility to prepare a SPCC Plan in accordance with good engineering practices to prevent, to the maximum extent possible, a potential oil spill onto protected waters. As required by the regulations, this Plan follows the sequence of the requirements in 40 CFR 112.

The regulation requires that the facility SPCC Plan must have the full approval of management at a level of responsibility authorized to commit the necessary resources to fully implement the Plan. A signed affirmation of managerial approval of this Plan may be found in Appendix E.

Oil Spill/Discharge History

112.7(a)(1)

No previous spills or discharges have been associated with this facility.

Alternative Organization of the SPCC Plan

122.7(a)(2)

This Plan contains no deviations from the regulations as specified in 40 CFR 112; thus, no alternative scenarios or methods for equivalent environmental protection are necessary.

Location

40 CFR 112.7(a)(3)

Parker Towing Company, Inc. operates BMT, a barge loading facility, situated east of Birmingport Road and north of Locust Fork in the Southwestern ¼ of Section 6, Township 17 South Range 5 West as shown on the 2018 Sylvan Springs, Alabama, U. S. G. S., 7.5-minute topographic map. The subject property is approximately 66.2 acres with a topography that slopes in a southern direction towards Locust Fork. The property is located in a predominantly industrial area and is surrounded by vegetation to the north and east, as well as a river to the south, with one industrial property to the west. Access to the facility is from Birmingport Road, located near the northwest corner of the property, and Locust Fork on the southwestern corner of the property. The eastern half of the property is used for the storage of coal as well as heavy equipment used to transport coal to the barges. The western half of the site consists of an office and a pole barn storage area for loading other material. Additionally, there is a pole barn located near the northern boundary for additional storage of other materials. A layout of the facility, including the location of the buildings and fuel storage locations, is shown in Figure 2.

Tank Capacities and Contents

112.7(a)(3)(i) and (iii)

BMT utilizes three (3) aboveground storage tanks (ASTs) and one (1) portable storage tank at the facility for storage of petroleum products. The locations of these ASTs are depicted in Figure 2 in Appendix A. The table below lists the facility ASTs, their location at the facility, capacity, and contents of the tanks, and the secondary containment structures provided:

TANK STORAGE AREAS			
Approximate Location	**Tank Volume (gallons)**	**Contents**	**Secondary Containment**
East of Storage Warehouse	2,000	Diesel Fuel	Double-walled under Metal Awning
East of Storage Warehouse	1,000	Diesel Fuel	Double-walled, in secondary containment, and under Metal Awning
East of Storage Warehouse	250	Used Oil	Double-walled, in secondary containment, and under Metal Awning
Mounted in Truck Bed	100	Diesel Fuel	Double-walled

Discharge Prevention Measure: Routine Handling and Drainage Controls

112.7(a)(3)(ii) and (iii)

A. Diesel Fuel Storage

This facility has two (2) diesel ASTs. One (1) 2,000-gallon double-walled AST and one (1) 1,000-gallon double-walled AST situated inside a metal secondary containment unit. These two ASTs are located east of the storage warehouse and are under cover by a metal awning.

B. Used Oil Storage

This facility has one (1) double-walled used oil AST, with a capacity of 250-gallons situated inside a metal secondary containment unit. This AST is located east of the storage warehouse and is under cover by a metal awning.

C. Hydraulic Fluid Storage

This facility uses 5-gallon buckets for the storage of hydraulic fluid. These buckets are located in the warehouse.

Spill Response/Cleanup

112.7(a)(3)(iv)

In the event of a spill, the Responsible Person(s) listed in this Plan should be notified immediately, and the following steps should be taken:

1. Attempt to determine the source, volume, and extent of the spill.
2. If a spill is in progress, determine the safest and quickest way to stop the spill (e.g., close defective valve, pump product out of leaking tank or container, etc.).
3. Contain the spill as close to the source as possible. Sandbags, earthen dams, or absorbent booms may be used to contain the spill and prevent flow into the drainage system.
4. After the flow of the product has been restricted, the product should be removed.
    A. In the event of a small spill, absorbent pads, oil dry, or other suitable materials may be used to recover the product. After the product has been removed, contaminated soils should be excavated and placed in a suitable container for characterization and disposal.
    B. In the event of a large spill, as much of the spilled material as possible should be transferred back into the tank or another structurally sound container. Contaminated soils should be excavated and placed in a suitable container for characterization and disposal. Other remediation options may apply, based on the extent and nature of the spill.

Disposal of Recovered Materials

112.7(a)(3)(v)

Used absorbent materials, contaminated soils, and containers of recovered petroleum products should be properly disposed. Recovered petroleum products will be used, if possible, or transported to a permitted recycling or disposal facility. If possible, spill residue will be placed in a Department of Transportation (DOT) - approved 55-gallon drum for transportation. Petroleum-contaminated waste must be disposed of in a Municipal Solid Waste Landfill (MSWLF) and/or a synthetically lined facility that has a valid ADEM permit and groundwater monitoring wells. Prior to disposal, a written certification that the waste is non-hazardous must be provided to the ADEM. Small quantities of petroleum-contaminated waste (containing less than 25 gallons of petroleum and a total material of less than five cubic yards per occurrence) do not require approval by the ADEM and may be disposed of in MSWLFs, Construction/Demolition landfills, or Industrial landfills.

Notification Requirements

112.7(a)(3)(vi)

In the event of a spill that has breached secondary containment, resulting in a release to the environment, the Port Manager should be notified immediately. The person responsible for overseeing spill cleanup and/or remediation activities is listed below.

Name:	Aaron Key
Title:	Port Manager
Telephone:	Office: (205) 391-1125
	Cell: (205) 534-0745

Name:	Eric Pearson
Title:	Regional Operations Manager
Telephone:	Office: (205) 391-1125
	Cell: (205) 454-0143

In the event that the amount of the release is greater than or equal to the substance's reportable quantity (RQ) limit, or that an oily material has impacted or has the potential to impact any river, creek, stream or tributary of the waters of the State of Alabama, the facility will contact the NRC, the ADEM, the Local EMA, and the Fire Department at the following phone numbers:

NRC		ADEM
Telephone:	(800) 424-8802	Telephone: (205) 271-7700
24hr:	(404) 562-8700	

Jefferson County EMA		Shady Grove Fire and Rescue
Telephone:	(205) 254-2039	Telephone: (205) 674-1200

The BMT Port Manager must notify authorities immediately upon his/her knowledge of a reportable release, but in no case later than 24 hours after the release. In the event of a discharge of oil products, HEPACO, Inc. (1-800-888-7689) will provide emergency response services as needed.

Notification Information

112.7(a)(4) and (5)

In the event that either a reportable release or a discharge to surface water occurs, the following information should be reported by telephone to ADEM and the NRC:

1. Name of person reporting spill
2. Company: Parker Towing Company, Inc.-Birmingham Marine Terminal
3. Facility Address: 8701 Birmingport Road Mulga, Jefferson County, Alabama, 35402
4. Telephone number: (205) 534-0745
5. Date and time of the discharge
6. Type of material discharged

7. Estimated quantity of material(s) discharged
8. Exact description of location of spill
9. Description of the material(s) spilled
10. Source of discharge (tank, pipe, etc.)
11. Description of all affected media (soil/water - Nearest receiving stream is Locust Fork)
12. Cause of discharge (tank failure, tank overfill, etc.)
13. Any damages or injuries caused by the discharge
14. Actions being used to stop, remove, and mitigate the effects of the discharge
15. Whether an evacuation may be needed
16. Names of individuals and/or organizations who have also been contacted

A written description addressing the measures taken in response to the release should be submitted to the ADEM within 15 days after the incident.

Should the facility discharge more than 1,000 gallons of oil in a single discharge, or more than 42 gallons of oil in each of two discharges occurring within any twelve-month period, as described in Section 112.1(b), the EPA Regional Administrator must be notified within 60 days from the time the facility becomes subject to this requirement. A discharge history form is provided in Appendix F.

This information is included in this Plan because BMT is not required to submit a response plan pursuant to Section 112.20. A FRP is not applicable because none of the thresholds are exceeded for the potential for "Substantial Harm" as provided in 40 CFR Part 112. A certification that this facility does not pose substantial harm is included in Appendix G.

Spill Potential

112.7(b)

The greatest potential for a release of petroleum products at the facility is from overfilling when loading product into the ASTs and during vehicle fueling operations from the diesel and gasoline tanks, but spills may also occur because of a failure of the structural integrity of a tank or product piping, or due to leakage of valves or other fittings. A summary of the potential release flow direction is listed in the table below:

Potential Event	Discharge Direction	Potential Release Volume	Discharge Rate
Complete failure of largest full tank	Southeast to facility outfall then South toward UT of Locust Fork	2,000 gallons	Instantaneous
Partial Failure of largest full tank	Southeast to facility outfall then South toward UT of Locust Fork	2,000 gallons	Gradual to Instantaneous
Tank overfill	Southeast to facility outfall then South toward UT of Locust Fork	1 to many gallons	Up to 20 gallons per minute
Leaking valve or valve packing	Southeast to facility outfall then South toward UT of Locust Fork	Several ounces to Several Gallons	Up to 1 gallon per minute
Failure of transfer container	Southeast to facility outfall then South toward UT of Locust Fork	Several ounces to one gallon	Gradual to Instantaneous
Hose leak during truck loading	Southeast to facility outfall then South toward UT of Locust Fork	1 to several gallons	Up to 1 gallon per minute
Pump rupture or failure	Southeast to facility outfall then South toward UT of Locust Fork	1 to several gallons	Up to 1 gallon per minute

Containment and Diversionary Structures

112.7(c)
All oil-containing aboveground containers with a capacity of 55-gallons or greater will be provided secondary containment. In determining the method, design, and capacity for secondary containment, the typical failure mode and the most likely quantity of oil that would be discharged needs to be addressed. If the container is stored outside, the containment structure must also have adequate freeboard to contain stormwater from a 25-year, 24-hour storm event. According to the NOAA Precipitation Frequency Atlas Maps, a 25 year, 24-hour stormwater event is approximately 7.0 inches.

Secondary containment may be either active or passive in design. Active containment measures are those that require deployment or other specific action by the operator. These measures may be deployed either before an activity involving the handling of oil starts, or in reaction to a discharge, so long as the active measure is designed to prevent an oil discharge from reaching navigable waters or adjoining shorelines. Passive measures are permanent installations and do not require deployment or action by the owner or operator.

All storage containers and oil-filled electrical and other operating equipment with 55-gallon capacities or greater that have a reasonable potential to discharge oil to navigable waters will have some form of containment and/or diversionary structures that would prevent a discharge from reaching the navigable waters. According to 40 CFR 112.7(c), at minimum one of the following discharge prevention systems will be used:

- Facility Structures, berms, or retaining walls sufficiently impervious to contain oil
- Curbing
- Culverting, gutters, or other drainage systems
- Weirs, booms, or other barriers
- Spill diversion ponds
- Retention ponds
- Sorbent materials

Spill Kits (Oil Containment Kits) including booms, sorbent material, or other barriers are available on-site. A spill response kit and absorbent materials are useful as an active form of containment.

Determination of Practicability

112.7(d)
The BMT facility structures and equipment that are required by regulation are determined to be in place and practicable. Sorbent materials and hand tools will supplement structural containment as an active form of secondary containment.

Inspections

112.7(e)
The tanks, piping, and secondary containment measures are inspected monthly. Each inspection is recorded on the Facility Inspection Checklist form provided as Appendix H to this Plan. Any deficiencies noted during the inspections will be reported to the Responsible Official and corrected expeditiously. Any corrective measures will be documented on the Facility Inspection Checklist. The Facility Inspection Checklist is signed by the inspector and records are maintained for a period of three years.

Daily informal observations will be performed by BMT personnel to identify evidence of damaged or leaking equipment, piping, and tanks. If a problem/deficiency is observed during any of these informal observations, the findings will be reported verbally to the Responsible Official for appropriate action. A formal inspection will be conducted, according to the procedures described above, and recorded on the Facility Inspection Checklist, and visual leaks will be repaired as soon as possible.

The tanks, piping, equipment, and secondary containment are to be inspected monthly for the following:

- The presence of visual structural deficiencies including corrosion, rust, thinning, cracks, holes, dents, or other visual deficiencies in the structural integrity of the tanks and product piping;
- Signs of instability or excessive settlement of foundations and supports;
- Signs of poor connection that could cause a discharge;
- Signs of improper function;
- The presence of petroleum/oil products within the dike system;
- Evidence of a release including oil, stained soils or concrete, or other spill residues around the filling area or product piping;
- Proper functioning of overfill prevention systems; and
- Adequate inventory of discharge response equipment and supplies (sorbent materials).

In addition to the periodic visual inspections of bulk containers, 40 CFR 112(8)(c)(6) requires structural integrity testing of all aboveground tanks containing oil products on a regular basis and whenever material repairs are made. This structural integrity testing may be hydrostatic, radiographic, acoustic, ultrasonic, or some other type of nondestructive testing. Although the testing must take place regularly in accordance with industry standards, the type and frequency with which this testing must take place is unspecified. For the other tanks located at the facility, EPA guidance refers the regulated community to the Steel Tank Institute (STI) SP001 Standard, which recommends an external visual or ultrasonic inspection every five years. Records of the structural integrity testing should be maintained for the life of the facility.

Personnel Training

112.7(f)
Oil-handling personnel will be trained on: the operation and maintenance of equipment to prevent discharges, discharge procedure protocols; the applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan. Designated personnel will be accountable for discharge prevention and will report to the Port Manager. Annual briefings which highlight and describe known discharges or failures, malfunctioning components, and any recently developed precautionary measures will be scheduled and conducted for oil-handling personnel. A record of Oil handling and Discharge Prevention Briefings Form is included with this plan as Appendix I.

Security

112.7 (g)
The master flow and drain valves associated with the ASTs shall be locked in the closed position when in non-operating or non-standby status. Fuel pumps should be locked after each use and de-energized when the facility is not in operation. Access to the buildings shall be locked, when not in operation. The facility has outdoor locking gates at the entrance to the property. Security lights should be placed in such a position so as to illuminate the facility in the areas of the ASTs. The security lights assist in the discovering of discharges at night and may prevent discharges occurring through acts of vandalism.

Tank Car and Tank Truck Loading/Unloading

112.7(h)
This regulatory provision applies only to tank truck loading/unloading areas. The following tank truck loading/unloading procedures are recommended:

1. The lowermost drain and all outlets on tank trucks will be inspected and tightened prior to filling and disconnection of oil transfer lines, and prior to vehicle departures.
2. Petroleum product loading/unloading will be manned at all times by two people: one to operate the pump, and one to observe the level of oil in the tank. If the level in the tank or in the truck begins to approach maximum capacity, the observer shall instruct the pump operator, via direct audible signal communication (see 40 CFR 112 (8)(c)(iii)), to cease pump operation.
3. Spill kits and spill booms will be stored at the fueling areas to provide prompt response in the event of a release. The spill kit and spill booms will be utilized in the event that a release occurs during tanker truck offloading at the facility.

Brittle Fracture Evaluation

112.7(l)
If an aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture failure or other catastrophe, the container will be evaluated for these failure risks and corrective action will be taken as necessary.

Conformance with State and Local Requirements

112.7(j)
This SPCC Plan was written in conformance with applicable requirements and effective discharge prevention and containment measures of 40 CFR 112. This SPCC Plan does not incorporate any additional state and local requirements.

Qualified Oil-Filled Operational Equipment

112.7(k)
This regulatory provision applies only to oil-filled operational equipment which qualifies for secondary containment exemption by meeting specified criteria. No oil-filled operational equipment having a storage capacity of 55-gallons or greater is located at the facility.

General Requirements

112.8(a)
The general requirements for a SPCC Plan listed under section 112.7 and the specific discharge prevention and containment procedures listed under section 112.8 are addressed in this SPCC Plan.

Facility Drainage

112.8(b)
Sheet flow across the western portion of the Site will drain southeast towards OF003. Sheet flow across the eastern portion of the Site will drain south which will eventually drain towards the detention ponds and then discharge at outfalls OF001 and OF002. The surface topography of the site will ultimately determine which direction spills will drain. A site map with stormwater flow directions is provided on Figure 2 in Appendix A.

All oil handling activities will take place within areas protected by secondary containment, i.e., within the metal or earthen secondary containment structure. No oil handling activities are to take place outside of these areas.

Should rainwater accumulate within a containment structure, the retained rainwater will be inspected to ensure that its presence will not cause a discharge that may be harmful as described in part 40 CFR 110. Prior to discharge, the accumulated rainwater shall be inspected for the presence of a sheen to ensure no oil or petroleum product will be discharged. Should drainage of the containment structure occur, the bypass valve shall be opened and resealed following drainage under responsible supervision, and adequate records of such events should be maintained with the SPCC Plan (Appendix F).

Bulk Storage Container Requirements

112.8(c)

1. Each aboveground fuel tank is constructed of steel. Tanks onsite are compatible with the products they contain and conditions of storage.
2. 5-gallon buckets containing hydraulic fluid are situated in the warehouse.
3. Drainage of rainwater from the metal secondary containment structures shall only be allowed if the following occurs:
   i. runoff rainwater is inspected to ensure compliance with applicable water quality standards and will not cause a harmful discharge;
   ii. and usual and customary business records or dike drainage records provided in Appendix F are maintained.
4. There are no underground storage tanks (USTs) at this facility.
5. There are no partially buried tanks at the facility. Use of such tanks requires special procedures, testing and recordkeeping, and future installation of such tanks should take such requirements into consideration.
6. Section 112.8 requires that aboveground tanks must be tested for integrity on a regular basis and after material repairs. The regulations do not specify an interval for testing, but the testing must be regular. These tests could be any of the following: hydrostatic, acoustic, radiographic, ultrasonic, or some other form of non-destructive testing. However, the EPA has recently indicated that, for shop-built tanks that are visible from all sides and that are not in contact with the soil, visible inspections may suffice for the integrity testing. New regulations are pending for requirements for these tanks. For the purposes of this plan, however, visible inspections for signs of corrosion and leakage replace the other suggested integrity testing. Refer to Section 112.7(e) Inspections, Tests, and Records.
7. There are no internal heating coils at this facility.
8. Tank filling operations shall be manned at all times by two people: one to operate the pump, and one to observe the level of oil in the tank. If the level in the tank or in the truck begins to approach maximum capacity, the observer shall instruct the pump operator, via direct audible signal communication (see 40 CFR 112 (8)(c)(iii)), to cease pump operation.
9. Oil leaks that result in a loss of oil from container seams, gaskets, rivets, and bolts will be promptly corrected and oil accumulations in the secondary containment areas should be removed promptly.
10. Any portable storage containers (drummed material) shall be stored inside the shop which will serve as a secondary containment area.

Facility Transfer Operations, Pumping, and Facility Process

112.8(d)
Facility piping that is not in service or is in standby service for an extended time should be capped or blank-flanged. Pipe supports shall be designed to minimize the potential for abrasion and corrosion and will allow for expansion and contraction. Aboveground valves, piping, and appurtenances shall be regularly inspected. Inspections shall evaluate the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking valves, and metal surfaces. This inspection is described in the section entitled "Inspections – 112.7(e)."

Spill Prevention, Control, and Countermeasure Plan Requirements for Onshore Oil Production Facilities

40 CFR 112.9
Not Applicable

Spill Prevention, Control, and Countermeasure Plan Requirements for Onshore Oil Drilling and Workover Facilities

40 CFR 112.10
Not Applicable

Spill Prevention, Control, and Countermeasure Plan Requirements for Offshore Oil Drilling and Workover Facilities

40 CFR 112.11
Not Applicable

Requirements for Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and for Vegetable Oils, Including Oils from Seeds, Nuts, and Fruits, and Kernals

40 CFR 112, SUBPART C
Not Applicable

Response Requirements

40 CFR 112, SUBPART D
This section is not applicable to this facility. A Certification of Substantial Harm Determination Form is included as Appendix G.

APPENDIX A

Figures

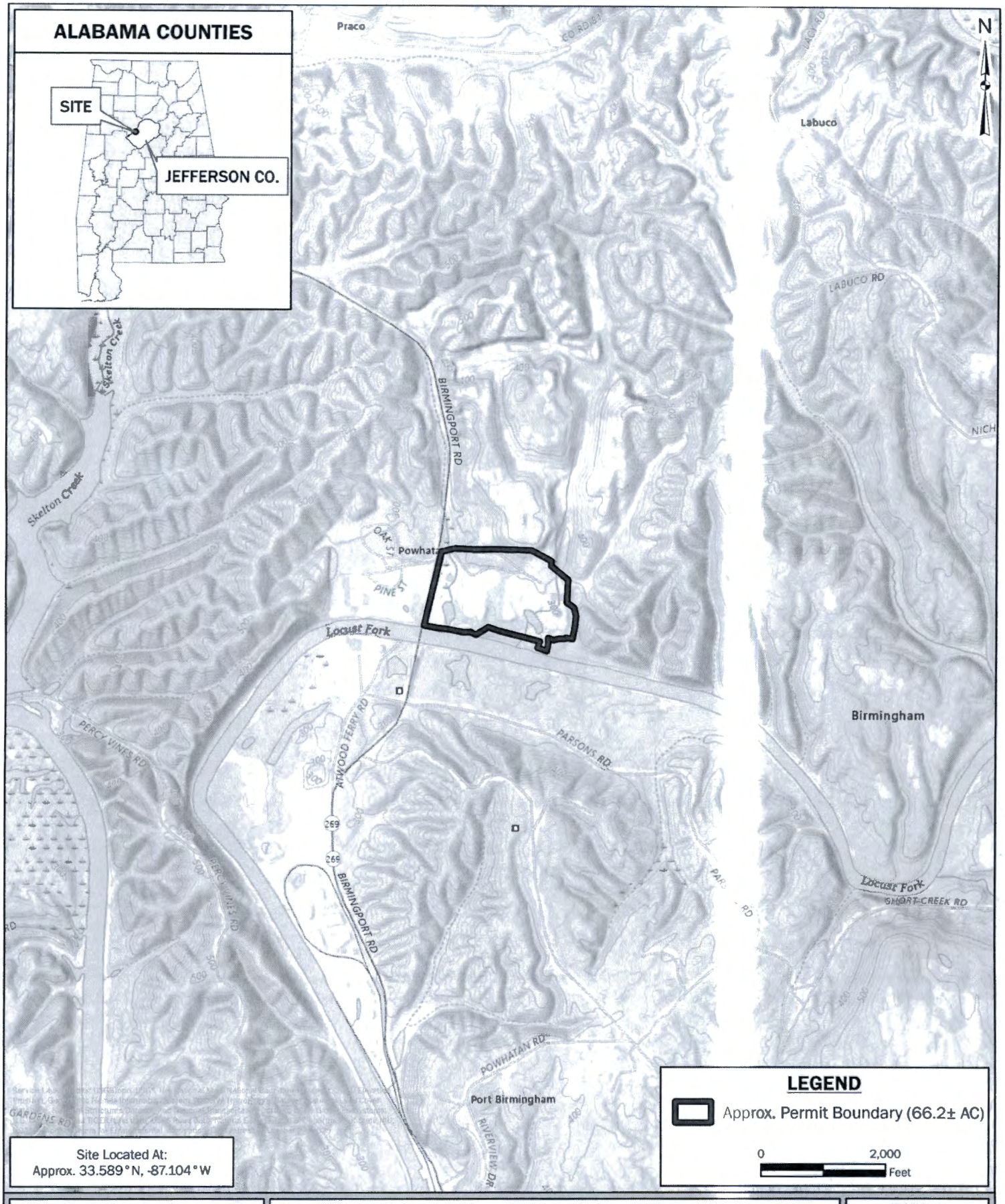


FIGURE 1: SITE LOCATION & TOPOGRAPHIC MAP

PARKER TOWING COMPANY, INC.
BIRMINGHAM MARINE TERMINAL
MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: USGS Topo Maps (See Service Layer Credits).

DRAWN BY:	SG
CHECKED BY:	SGR
DRAWING DATE:	02/10/2026
REVISION DATE:	N/A
TTL JOB NO.:	20-01-01599.25
APPROX. SCALE:	1 in = 2,000 ft



TTL

FIGURE 2: SITE MAP

PARKER TOWING COMPANY, INC.
BIRMINGHAM MARINE TERMINAL
MULGA, JEFFERSON COUNTY, ALABAMA
BASEMAP: Google Earth Satellite Imagery, 02/28/2025.

DRAWN BY: SG
CHECKED BY: SGR
DRAWING DATE: 02/10/2026
REVISION DATE: N/A
TTL JOB NO.: 20-01-01599.25
APPROX. SCALE: 1 in = 350 ft

APPENDIX B

Definitions

APPENDIX B

Definitions from 40 CFR Part 112 Oil Pollution Prevention

Adverse Weather means weather conditions that make it difficult for response equipment and personnel to clean up or remove spilled oil, and that must be considered when identifying response systems and equipment in a response plan for the applicable operating environment. Factors to consider include significant wave height as specified in appendix E to this part (as appropriate), ice conditions, temperatures, weather-related visibility, and currents within the area in which the systems or equipment is intended to function.

Alteration means any work on a container involving cutting, burning, welding, or heating operations that changes the physical dimensions or configuration of the container.

Animal Fat means a non-petroleum oil, fat, or grease of animal, fish, or marine mammal origin.

Breakout Tank means a container used to relieve surges in an oil pipeline system or to receive and store oil transported by a pipeline for reinjection and continued transportation by pipeline.

Bulk Storage Container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

Bunkered Tank means a container constructed or placed in the ground by cutting the earth and recovering the container in a manner that breaks the surrounding natural grade, or that lies above grade, and is covered with earth, sand, gravel, asphalt, or other material. A bunkered tank is considered an aboveground storage container for purposes of this part.

Completely Buried Tank means any container completely below grade and covered with earth, sand, gravel, asphalt, or other material. Containers in vaults, bunkered tanks, or partially buried tanks are considered aboveground storage containers for purposes of this part.

Complex means a facility possessing a combination of transportation-related and non-transportation related components that is subject to the jurisdiction of more than one Federal agency under section 311 (j) of the CWA.

Contiguous Zone means the zone established by the United States under Article 24 of the Convention of the Territorial Sea and Contiguous Zone, that is contiguous to the territorial sea and that extends nine miles seaward from the outer limit of the territorial area.

Contract or Other Approved Means means:

(1) A written contractual agreement with an oil spill removal organization that identifies and ensures the availability of the necessary personnel and equipment within appropriate response times; and/or

(2) A written certification by the owner or operator that the necessary personnel and equipment resources, owned or operated by the facility owner or operator, are available to respond to a discharge within appropriate response times; and/or

(3) Active membership in a local or regional oil spill removal organization that has identified and ensures adequate access through such membership to necessary personnel and equipment to respond to a discharge within appropriate response times in the specified geographic area; and/or

(4) Any other specific arrangement approved by the Regional Administrator upon request of the owner or operator.

Discharge includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil, but excludes discharges in compliance with a permit under section 402 of the CWA; discharges resulting from circumstances identified, reviewed, and made a part of the public record with respect to a permit issued or modified under section 402 of the CWA, and subject to a condition in such permit; or continuous or anticipated intermittent discharges from a point source, identified in a permit or permit application under section 402 of the CWA, that are caused by events occurring within the scope of relevant operating or treatment systems. For purposes of this part, the term discharge shall not include any discharge of oil that is authorized by a permit issued under section 13 of the River and Harbor Act of 1899 (33 U.S.C. 407).

Facility means any mobile or fixed, onshore or offshore building, property, parcel, lease, structure, installation, equipment, pipe, or pipeline (other than a vessel or a public vessel) used in oil well drilling operations, oil production, oil refining, oil storage, oil gathering, oil processing, oil transfer, oil distribution, and oil waste treatment, or in which oil is used, as described in appendix A to this part. The boundaries of a facility depend on several site-specific factors, including but not limited to, the ownership or operation of buildings, structures, and equipment on the same site and types of activity at the site. Contiguous or non-contiguous buildings, properties, parcels, leases, structures, installations, pipes, or pipelines under the ownership or

operation of the same person may be considered separate facilities. Only this definition governs whether a facility is subject to this part.

Farm means a facility on a tract of land devoted to the production of crops or raising of animals, including fish, which produced and sold, or normally would have produced and sold, $1,000 or more of agricultural products during a year.

Fish and Wildlife and Sensitive Environments means areas that may be identified by their legal designation or by evaluations of Area Committees (for planning) or members of the Federal On-Scene Coordinator's spill response structure (during responses). These areas may include wetlands, National and State parks, critical habitats for endangered or threatened species, wilderness and natural resource areas, marine sanctuaries and estuarine reserves, conservation areas, preserves, wildlife areas, wildlife refuges, wild and scenic rivers, recreational areas, national forests, Federal and State lands that are research national areas, heritage program areas, land trust areas, and historical and archaeological sites and parks. These areas may also include unique habitats such as aquaculture sites and agricultural surface water intakes, bird nesting areas, critical biological resource areas, designated migratory routes, and designated seasonal habitats.

Injury means a measurable adverse change, either long- or short-term, in the chemical or physical quality or the viability of a natural resource resulting either directly or indirectly from exposure to a discharge, or exposure to a product of reactions resulting from a discharge.

Loading/Unloading Rack means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.

Maximum Extent Practicable means within the limitations used to determine oil spill planning resources and response times for on-water recovery, shoreline protection, and cleanup for worst case discharges from onshore non-transportation-related facilities in adverse weather. It includes the planned capability to respond to a worst-case discharge in adverse weather, as contained in a response plan that meets the requirements in §112.20 or in a specific plan approved by the Regional Administrator.

Mobile Refueler means a bulk storage container onboard a vehicle or towed, that is designed or used solely to store and transport fuel for transfer into or from an aircraft, motor vehicle, locomotive, vessel, ground service equipment, or other oil storage container.

Motive Power Container means any onboard bulk storage container used primarily to power the movement of a motor vehicle, or ancillary onboard oil-filled operational equipment. An onboard bulk storage container which is used to store or transfer oil for further distribution is not a motive power container. The definition of motive power container does not include oil drilling or workover equipment, including rigs.

Navigable Waters of the United States means "navigable waters" as defined in section 502(7) of the FWPCA, and includes:

(1) All navigable waters of the United States, as defined in judicial decisions prior to passage of the 1972 Amendments to the FWPCA (Pub. L. 92-500), and tributaries of such waters;

(2) Interstate waters;

(3) Intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and

(4) Intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.

Non-Petroleum Oil means oil of any kind that is not petroleum-based, including but not limited to: Fats, oils, and greases of animal, fish, or marine mammal origin; and vegetable oils, including oils from seeds, nuts, fruits, and kernels.

Offshore Facility means any facility of any kind (other than a vessel or public vessel) located in, on, or under any of the navigable waters of the United States, and any facility of any kind that is subject to the jurisdiction of the United States and is located in, on, or under any other waters.

Oil means oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Oil-Filled Operational Equipment means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.

Oil Spill Removal Organization means an entity that provides oil spill response resources, and includes any for-profit or not-for-profit contractor, cooperative, or in-house response resources that have been established in a geographic area to provide required response resources.

Onshore Facility means any facility of any kind located in, on, or under any land within the United States, other than submerged lands.

Owner or Operator means any person owning or operating an onshore facility or an offshore facility, and in the case of any abandoned offshore facility, the person who owned or operated or maintained the facility immediately prior to such abandonment.

Partially Buried Tank means a storage container that is partially inserted or constructed in the ground, but not entirely below grade, and not completely covered with earth, sand, gravel, asphalt, or other material. A partially buried tank is considered an aboveground storage container for purposes of this part.

Permanently Closed means any container or facility for which:

(1) All liquid and sludge has been removed from each container and connecting line; and

(2) All connecting lines and piping have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.

Person includes an individual, firm, corporation, association, or partnership.

Petroleum Oil means petroleum in any form, including but not limited to crude oil, fuel oil, mineral oil, sludge, oil refuse, and refined products.

Produced Water Container means a storage container at an oil production facility used to store the produced water after initial oil/water separation, and prior to reinjection, beneficial reuse, discharge, or transfer for disposal.

Production Facility means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flow lines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part.

Regional Administrator means the Regional Administrator of the Environmental Protection Agency, in and for the Region in which the facility is located.

Repair means any work necessary to maintain or restore a container to a condition suitable for safe operation, other than that necessary for ordinary, day-to-day maintenance to maintain the functional integrity of the container and that does not weaken the container.

Spill Prevention, Control, and Countermeasure Plan; SPCC Plan, or Plan means the document required by §112.3 that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.

Storage Capacity of a container means the shell capacity of the container.

Transportation-Related and Non-Transportation-Related, as applied to an onshore or offshore facility, are defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of the Environmental Protection Agency, dated November 24, 1971, (appendix A of this part).

United States means the States, the District of Columbia, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, Guam, American Samoa, the U.S. Virgin Islands, and the Pacific Island Governments.

Vegetable Oil means a non-petroleum oil or fat of vegetable origin, including but not limited to oils and fats derived from plant seeds, nuts, fruits, and kernels. *Vessel* means every description of watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water, other than a public vessel.

Wetlands means those areas that are inundated or saturated by surface or groundwater at a frequency or duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include playa lakes, swamps, marshes, bogs, and similar areas such as sloughs, prairie potholes, wet meadows, prairie river overflows, mudflats, and natural ponds.

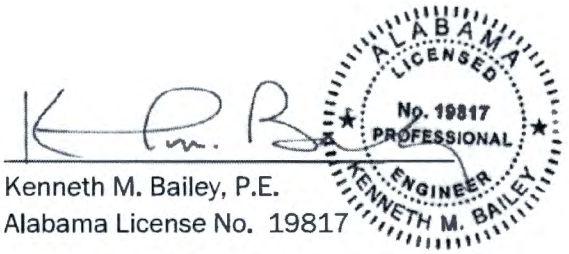
Worst case Discharge for an onshore non-transportation-related facility means the largest foreseeable discharge in adverse weather conditions as determined using the worksheets in appendix D to this part (40 CFR 112).

APPENDIX C

Professional Engineer Certification

PROFESSIONAL ENGINEER CERTIFICATION

CERTIFICATION: I certify under penalty of law that I am a Registered Professional Engineer familiar with the provisions of 40 CFR 112. Based on my review of this Spill Prevention, Control, and Countermeasure (SPCC) Plan, I certify that, to the best of my knowledge, this SPCC Plan was prepared in accordance with the provisions of 40 CFR 112 and good engineering practices.



Kenneth M. Bailey, P.E.
Alabama License No. 19817

02/17/2026
Date

APPENDIX D

Five Year Review Summary Page

FIVE YEAR PLAN SUMMARY PAGE B 40 CFR 112.5

In accordance with 40 CFR 112.5, a review and evaluation of this SPCC Plan must be performed at any time that there is a change in the design, construction, operation, or maintenance that materially affects its potential for a discharge. Also, a review and evaluation of the Plan must be conducted at least once every 5 years. If any amendments are needed, they must be made and implemented within six months of the review. If any technical amendments are required for the plan, the changes require the certification of Professional Engineer.

By signing the log below, I certify that *I have completed review and evaluation of the SPCC Plan for BMT on the date shown and will amend the Plan (if indicated in the log) as a result.*

Reviewer Name (Signature)	Reviewer Name (Print)	Date	Will Plan Be Amended? (Yes/No)	P.E. Certification Required? (Yes/No)

APPENDIX E

Management Approval

MANAGEMENT APPROVAL

I certify that this Spill Prevention, Control and Countermeasure (SPCC) Plan was prepared with my knowledge. I understand that for the SPCC to be valid and effective, the procedures and recommendations in the SPCC Plan must be implemented at my facility. I have read and approved the procedures and practices outlined in this Plan, and I have the authority to implement the changes at my facility required to comply with the Plan.

Aaron Key, Port Manager
Parker Towing Co., Inc. – Birmingham Marine Terminal

2/17/20.
Date

APPENDIX F

Past Discharge History

PAST DISCHARGE HISTORY B 40 CFR 112.7(a)

Parker Towing Co., Inc.
Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

Description of Spill	Corrective Actions Taken	Plan for Preventing Recurrence	Drainage Log

APPENDIX G

Certification of Substantial Harm Determination Form

Certification of Substantial Harm Determination Form

Facility Name: Parker Towing Co., Inc. – Birmingham Marine Terminal
Facility Address: 8701 Birmingport Road
Mulga, Jefferson County, Alabama

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater to or equal to 42,000 gallons?

   Yes _____ No X

2. Does the facility have a total oil storage capacity greater to or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

   Yes _____ No X

3. Does the facility have a total oil storage capacity greater to or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plan" Fish and Wildlife Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

   Yes _____ No X

4. Does the facility have a total oil storage capacity greater to or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

   Yes _____ No X

5. Does the facility have a total storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

   Yes _____ No X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document. Based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate and complete.

Aaron Key
Name (Please type or print)

Port Manager
Title

Aaron Key
Signature

2/17/20
Date

APPENDIX H

Facility Inspection Checklist

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Retain Until Date: _____ (36 months from inspection date)

Prior Inspection Date: _____ Inspector Name: _____

Tanks Inspected (ID #'s): _____

Inspection Guidance:

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- (*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- **In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

Item	Task	Status	Comments
1.0 Tank Containment			
1.1 Containment structure	Check for water, debris, cracks or fire hazard	□Yes* □No □N/A	
1.2 Primary tank	Check for water	□Yes* □No	
1.3 Containment drain valves	Operable and in a closed position	□Yes □No* □N/A	
1.4 Pathways and entry	Clear and gates/doors operable	□Yes □No* □N/A	
2.0 Leak Detection			
2.1 Tank	Visible signs of leakage	Yes* No	
2.2 Secondary Containment	Visible signs of leakage from tank into secondary containment	□Yes* □No	
2.3 Surrounding soil	Visible signs of leakage	□Yes* □No □N/A	
2.4 Interstice	Visible signs of leakage	□Yes* □No □N/A	

Item	Task	Status	Comments
3.0 Tank Equipment			
3.1 Valves	a. Check for leaks.	□Yes* □No □N/A	
	b. Tank drain valves must be kept locked.	□Yes* □No □N/A	
3.2 Spill containment boxes on fill pipe	a. Inspect for debris, residue, and water in the box and remove.	□Yes* □No □N/A	
	b. Drain valves must be operable and closed.	□Yes* □No □N/A	
3.3 Liquid level equipment	a. Both visual and mechanical devices must be inspected for physical damage.	□Yes □No* □N/A	
	b. Check that the device is easily readable	□Yes □No* □N/A	
3.4 Overfill equipment	a. If equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery powered. Replace the battery if needed	□Yes □No* □N/A	
	b. If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	□Yes □No* □N/A	
3.5 Piping connections	Check for leaks, corrosion and damage	□Yes* □No	
4.0 Tank Attachments and Appurtenances			
4.1 Ladder and platform structure	Secure with no sign of severe corrosion or damage?	□Yes □No* □N/A	
5.0 Other Conditions			
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site spill prevention plan?		□Yes* □No	

Additional Comments:

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature: _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent and meet all applicable inspection checklist items.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Promptly remove standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- * designates an item in a non-conformance status. This indicates that action is required to address a problem. Note that non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank Foundation/Supports		
1	Free of tank settlement or foundation washout?	☐ Yes ☐ No*	
2	Concrete pad or ring wall free of cracking and spalling?	☐ Yes ☐ No* ☐ N/A	

3	Tank supports in satisfactory condition?	☐ Yes ☐ No* ☐ N/A	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	☐ Yes ☐ No* ☐ N/A	
5	Is the grounding strap between the tank and foundation/supports in good condition?	☐ Yes ☐ No* ☐ N/A	
Tank Shell, Heads and Roof			
6	Free of visible signs of coating failure?	☐ Yes ☐ No*	
7	Free of noticeable distortions, buckling, denting, or bulging?	☐ Yes ☐ No*	
8	Free of standing water on roof?	☐ Yes ☐ No* ☐ N/A	
9	Are all labels and tags intact and legible?	☐ Yes ☐ No*	
Tank Manways and Piping			
10	Are piping system joints, manway covers, gaskets, and attachment bolts tight and in good condition with no sign of wear, damage, leaks or corrosion?	☐ Yes ☐ No* ☐ N/A	
11	Are piping supports in good condition and free of corrosion and damage?	☐ Yes ☐ No* ☐ N/A	
12	Is leak or release detection on underground piping being performed and documented if required?	☐ Yes ☐ No* ☐ N/A	
Tank Equipment			
13	Normal and emergency vents free of obstructions?	☐ Yes ☐ No*	
14	Have the level sensing devices (e.g, level gauges, alarms) been checked for operability, where possible, as per manufacturer's instructions or good engineering practice?	☐ Yes ☐ No* ☐ N/A	
15	Have flame arrestors been maintained per manufacturer's recommendations?	☐ Yes ☐ No* ☐ N/A	
16	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manways).	☐ Yes ☐ No* ☐ N/A	

17	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?"	☐ Yes ☐ No* ☐ N/A	
18	Are all valves free of leaks, corrosion, and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable): ☐ Anti-siphon valve ☐ Check valve ☐ Gate, ball, or isolation valve ☐ Pressure regulator valve ☐ Expansion relief valve ☐ Solenoid valve ☐ Fire valve ☐ Shear valve	 ☐ Yes ☐ No* ☐ N/A ☐ Yes ☐ No* ☐ N/A ☐ Yes ☐ No* ☐ N/A ☐ Yes ☐ No* ☐ N/A ☐ Yes ☐ No* ☐ N/A ☐ Yes ☐ No* ☐ N/A ☐ Yes ☐ No* ☐ N/A ☐ Yes ☐ No* ☐ N/A	
19	Are strainers and filters clean and in good condition?	☐ Yes ☐ No* ☐ N/A	
	Insulated Tanks		
20	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	☐ Yes ☐ No* ☐ N/A	
21	Insulation free of noticeable areas of moisture?	☐ Yes ☐ No* ☐ N/A	
22	Insulation free of mold?	☐ Yes ☐ No* ☐ N/A	
23	Free of visible signs of coating failure?	☐ Yes ☐ No* ☐ N/A	
	Other Equipment		
24	Are electrical wiring and boxes in good condition?	☐ Yes ☐ No* ☐ N/A	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	☐ Yes ☐ No* ☐ N/A	

Additional Comments:

APPENDIX I

Record of Personnel Oil Handling and Discharge Prevention Briefings

RECORD OF PERSONNEL OIL HANDLING AND DISCHARGE PREVENTION BRIEFINGS FORM

In accordance with the requirements of 40 CFR 112.7(f), this record of discharge prevention briefings for oil handling personnel will be completed at least once every year. The briefings must highlight and describe known discharges or failures, malfunctioning components, and any recently developed precautionary measures. Further descriptions or comments should be attached on a separate sheet of paper if necessary. Each person who participated in the briefing is listed below with printed name, signature, and the date of participation in the briefing.

Facility Name: Birmingham Marine Terminal

Name (Printed)	Signature	Date

BEST MANAGEMENT PRACTICES (BMP) PLAN

BIRMINGHAM
MARINE TERMINAL
A Parker Towing Facility

8701 BIRMINGPORT ROAD
MULGA, JEFFERSON COUNTY, ALABAMA

Prepared for:

Parker Towing Co., Inc.
Attn: Will Sledge c/o Aaron Key
P.O. Box 20908 Tuscaloosa, AL 35402

Prepared by:

TTL, Inc.
3200 Rice Mine Road, NE
Tuscaloosa, Alabama 35406

Project No. 20-01-01599.00

TTL

BEST MANAGEMENT PRACTICES PLAN

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

IN THE EVENT OF A DISCHARGE TO THE NEAREST RECEIVING WATER, CONTACT:

Facility Response Coordinators:

Contact:	Aaron Key, Port Manager	c(205) 534-0745
Alternate Contact:	Eric Pearson, Regional Operations Manager	c(205) 454-0143

AGENCY	TOLL FREE NUMBER	REGULAR NUMBER
U.S. National Response Center (NRC)	(800) 424-8802	(202) 426-2675
Alabama Emergency Management Agency (EMA)	(800) 843-0699	
Alabama Department of Public Safety		(334) 242-4378
Alabama Department of Environmental Management (ADEM)	(800) 424-9300	(334) 260-2700

If oil is discharged to a creek or stream, or if oil is discharged to soil or concrete outside of secondary containment and a rain event is imminent, call all agencies listed above. If oil is discharged to soil or concrete outside of secondary containment and no rain event is imminent, notify either ADEM (business hours) or Alabama EMA (after hours).

The following information should be reported by telephone to ADEM and the NRC:

1. Name of the person reporting the spill
2. Company: Birmingham Marine Terminal
3. Mailing Address: 8701 Birmingport Road, Mulga, AL 35118
4. Company Telephone Number: (205) 534-0745
5. Facility Telephone Number: (205) 534-0745
6. Date and time of the spill:
7. Facility address and location of the spill: 8701 Birmingport Road, Mulga, AL 35118
8. Description of the material(s) spilled:
9. Estimated quantity of material(s) spilled:
10. Source of spill (e.g., tank):
11. Cause of spill (e.g., tank rupture, tank overfill):
12. Description of all affected media:
13. Damages or injuries caused by the spill:
14. Actions being taken to stop, remove, and mitigate the effects of the spill:
15. Weather conditions:
16. Whether an evacuation may be needed:
17. Nearest receiving stream: Locust Fork
18. Other agencies to be notified or about to be notified:

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BEST MANAGEMENT PRACTICES PLAN

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

PROFESSIONAL ENGINEER CERTIFICATION

CERTIFICATION: "I certify under penalty of law that I am a registered professional engineer experienced in stormwater management. The information submitted herein, to the best of my knowledge and belief, is true, accurate, and complete. I am aware that there are significant penalties for submitting false information."

Professional: Sheryle G. Reeves, P.E. Registration Number: 20128 State AL



Signature: _____ Date of Plan Certification: February 17, 2026

BEST MANAGEMENT PRACTICES PLAN

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

MANAGEMENT APPROVAL

"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 gathered and evaluated 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."

Aaron Key
Name

2/17/26
Date

Port Manager
Title

Aaron Key
Signature

BEST MANAGEMENT PRACTICES PLAN

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

1.0 INTRODUCTION

This Stormwater Best Management Practices (BMP) Plan has been developed for the Birmingham Marine Terminal (BMT) facility located at 8701 Birmingport Road, Mulga, Jefferson County, Alabama. This BMP Plan describes the various actions the facility will undertake to prevent the contamination of stormwater runoff. The BMP Plan was designed to meet the following objectives:

- To identify the sources of stormwater and non-stormwater pollution that affects the quality of stormwater discharges from the site.
- To identify and describe the implementation of practices to reduce the pollutants in stormwater discharges.
- To outline an implementation schedule for carrying out evaluating on a regular basis the stormwater management actions prescribed in the BMP Plan.

The Standard Industrial Classification (SIC) codes for the BMT are 4491 (Marine Cargo Handling). This BMP Plan is compliant with the Alabama Department of Environmental Management (ADEM) Individual National Pollutant Discharge Elimination System (NPDES) Permit for discharge of stormwater associated with marine cargo handling. The facility is currently permitted under an ADEM General Industrial NPDES Permit (ALG141144) and an ADEM Individual Mining Permit (AL0078310). The facility is in the process of applying for an ADEM Individual NPDES permit. A copy of the permit is provided in Appendix A. The BMP Plan will be retained on-site at the BMT and will be made available upon request to the ADEM Director or their authorized representative.

The BMP Plan for the BMT was prepared in accordance with the Best Management Practices Plan requirements of ADEM Individual NPDES Permit and the EPA document entitled *Developing your Stormwater Pollution Prevention Plan: A Guide for Industrial Operators*, February 2009.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

The following sections provide general information about the facility, a description of discharge from the facility, facility contact information, and responsibilities of the BMP team.

2.1 Facility Information

The BMT is located at 8701 Birmingport Road, Mulga, Jefferson County, Alabama. A Site Location and Topographic Map which shows the location of the property is presented in Figure 1, in Appendix B (Sylvan Springs, Alabama Quadrangle Map).

The permit area consists of a 66.3-acre site with a gated entrance and includes three process areas: loading area, material storage area, and vehicle fueling area. There is also an equipment maintenance area and several warehouses. The vehicle fueling areas include one (1) 1,000-gallon diesel aboveground storage tank (AST), one (1) 2,000-gallon diesel AST, and one (1) 250-gallon used oil AST. Additionally, BMT has a 100-gallon portable fuel tank (diesel) for refueling equipment mounted in the back of a truck. The site is enclosed by a historic mining site to the north, Birmingport Road to the west, Locust Fork to the south and undeveloped land to the east. The facility can be accessed from Birmingport Road on the western side of the property. The facility is depicted on the Figure 2 Site Map, in Appendix B.

Additionally, TCR maintains a separate Spill Prevention, Control, and Countermeasure (SPCC) Plan that was prepared in accordance with 40 CFR Part 112. Petroleum storage, handling, transfer procedures, secondary containment, inspection protocols, and petroleum spill response measures are governed under the SPCC Plan. This BMP Plan primarily addresses non-petroleum stormwater management practices and does not supersede SPCC regulatory requirements.

2.2 General Facility Information

Facility Name:	Birmingham Marine Terminal
Facility Diagram:	Figure 1: Site Location & Topographic Map Figure 2: Site Map
Business Address:	1001 3rd Street Northport, AL 35476
Facility Location:	8701 Birmingport Road Mulga, AL 35118
Owner:	Parker Towing Company, Inc.
Responsible Person:	Aaron Key, Port Manager, c(205) 534-0745
Contact:	Aaron Key, Port Manager, c(205) 534-0745
Alternate Contact:	Eric Pearson, Regional Operations Manager, c(205) 454-0143
Facility Description:	Unloading and loading of products as well as storage of equipment
Fixed Storage:	Yes
Outdoor ASTs:	Yes
USTs:	No
Portable Storage:	Yes
Treatment Facilities:	None
SIC Code(s):	4491 (Marine Cargo Handling)

2.3 Discharge Information

The BMT permit area is a total of 66.3± acres. The facility is situated on the northern bank of Locust Fork. The permit area is used for equipment operations, shipping/receiving, barge transfers,

maintenance, and materials and equipment storage. Stormwater runoff generally follows site topography. The topography of the site is sloped to the south; therefore, all stormwater drains to Locust Fork.

During a heavy rainfall event, stormwater from the site may discharge via overland flow to Locust Fork. Care should be taken to ensure that all necessary BMP measures and erosion control structures are being properly implemented and maintained in order to prevent and/or reduce the potential for adverse stormwater discharges.

There are no treatment systems or lift stations associated with facility operations.

Figure 2 indicates the general drainage patterns across the site and shows the location of the outfalls.

2.4 Pollution Prevention Team

A current list of Stormwater Pollution Prevention Team member names and contact numbers is included in Appendix C and will be updated as needed. To ensure that the BMP Plan remains effective, the BMP Coordinator, Aaron Key, will be aware of any changes that are made in operations in order to assess the impact of the changes on stormwater pollution prevention. The responsibilities of the Stormwater Pollution Prevention Plan Coordinator are as follows:

- Ensure compliance with the NPDES Permit;
- Implement the Best Management Practices Plan;
- Modify the Best Management Practices Plan as needed to comply with the NPDES Permit;
- Oversee maintenance practices;
- Conduct, or provide for, inspection and monitoring activities;
- Identify deficiencies and ensure correction of deficiencies;
- Prepare and submit reports; and
- Serve as a facility contact with the regulatory agency.

The Stormwater Pollution Prevention Team will meet on an annual basis. During these meetings, the team will discuss the goals of the BMP Plan, review BMP progress, address comments and suggestions received from others, and determine if changes need to be made to the plan to meet its objectives. The team will revise the BMP Plan as necessary.

The Pollution Prevention Team is responsible for maintaining this document and assisting the Responsible Person in its implementation, maintenance, and revision. Team members are most familiar with the facility and its operations and are tasked with providing adequate structure and direction to the facility's overall stormwater management program.

While a designated Pollution Prevention Team can be assigned the job of developing and implementing the BMP, facility management is ultimately responsible for the implementation of the Plan and for Compliance with all applicable stormwater requirements.

2.5 Employee Training

Introductory awareness and specific job training will be conducted to ensure that employees are aware of the requirements of the BMP Plan. The purpose of the training program is to teach personnel at all levels of responsibility the components and goals of the BMP Plan. When properly trained, personnel are more capable of preventing spills, responding safely and effectively to an accident when one occurs, and recognizing situations that could lead to stormwater contamination. On-the-job training will be used, as necessary, as part of this comprehensive program. The BMP Coordinator will review the personnel training program with supervisors to determine the effectiveness of and/or the need for changes to the program. The BMP Coordinator will regularly evaluate the effectiveness of the training efforts and provide additional training, or revise the training program as necessary. In many cases, this

will simply involve inclusion of the BMP Plan topics within weekly safety briefings and speaking with employees to verify that information has been communicated effectively.

This course is given to the employee within six months of his/her date of hire and annually thereafter by a trained and qualified instructor. A record of this training is documented within the BMP Plan.

In addition, the BMT maintains a stormwater pollution prevention training program. This training is provided to all employees whose duties include maintaining secondary containment or stormwater drainage pathways and other routine inspection and compliance areas and employees who work in areas where industrial materials or activities are exposed to stormwater, including all members of the Pollution Prevention Team. This training will be conducted annually and be documented on the provided Record of Personnel Training which will be kept in Appendix D of the BMP Plan.

At a minimum, the introductory awareness training and BMP Plan training programs include the areas of interest as described below.

2.5.1 Spill Prevention and Response

Spill prevention and response procedures will be included in the training program in order to ensure that all facility employees are aware of what to do if a spill occurs. Specifically, the training program will be for all employees involved in industrial activities, and will include the following topics:

- Identification of potential spill areas and drainage routes;
- Information on past spills and causes;
- Procedures for reporting spills to appropriate individuals;
- Procedures and requirements for material handling and storage; and
- Procedures for responding to spills (expeditiously stopping, containing, and cleaning up all spills).

2.5.2 Good Housekeeping

Facility personnel will be shown how to maintain a clean and orderly work environment. Updates to procedures and reports on the progress of good housekeeping practices will be discussed at safety briefings. This includes emphasizing the following tasks:

- Regularly pick up and/or sweep;
- Promptly clean up spilled materials;
- Maintain brooms, vacuums, sorbents, foams, neutralizing agents, and other good housekeeping and spill response equipment in designated areas; and
- Properly secure totes, drums, and containers, frequently checking for leaks and spills.

2.5.3 Material Management Practices

Facility personnel will be instructed on the best management practices (BMPs) for material management, such as:

- Organize materials neatly for storage;
- Identify all hazardous substances stored, handled, and produced on-site; and
- Use proper precautions for handling of hazardous materials.

2.6 Activities at the Facility

The BMT serves as an area for shipping/receiving and barge transfers as well as equipment storage and maintenance. The site also includes ground transportation in the arrival/departure of crew members from the site. The facility is located on a 66.3±-acre site at 8701 Birmingport Road, Mulga, Jefferson County, Alabama. The site can be accessed by the main entrance off of Birmingport Road or

by the bank of Locust Fork. Figure 1 is a Topographic Location Map, Figure 2 is a Site Map that depicts stormwater flow directions, outfall locations, and tank storage at the facility.

The BMT has enclosed warehouses, covered product and equipment storage, product transfer conveyors, outdoor product storage, one (1) barge loading/unloading docks, and one (1) barge loading dock. The storage and maintenance areas are used throughout the year. There are (2) stationary ASTs containing diesel , one (1) stationary AST containing used oil, and one (1) portable equipment fueling tank containing diesel that is mounted to a truck. The used oil in the AST is disposed of properly once full.

All building locations and other information relevant to this BMP Plan are shown on Figure 2.

2.7 General Location Map

The facility is located at 8701 Birmingport Road, Mulga, Jefferson County, Alabama. A Topographic Location Map, which shows the location of the property and topography, is presented in Appendix B as Figure 1.

2.8 Site Maps

Figure 2, available in Appendix B, is a Site Map that depicts the Site boundary, area of facility activities, stormwater outfalls, and stormwater flow direction.

3.0 POTENTIAL POLLUTANT SOURCES

This section describes the potential sources which may be reasonably expected to add significant amounts of pollutants to stormwater discharges or which may result in the discharge of pollutants during dry weather. Based on the information obtained from a review of existing documents and interviews, a description and location of the potential pollutant sources was developed to assist in determining the best stormwater management practices for the facility.

A TTL, Inc. (TTL) representative, Shelley Gordon, accompanied by a Parker Towing Company representatives, Eric Pearson and Aaron Key, performed a visual assessment of the facility on January 7, 2026, to review areas of the facility potentially exposed to stormwater runoff and to observe and document materials handling and storage areas.

The following areas of the facility and site practices associated with stormwater management were evaluated during the site assessment:

- Site Drainage/Stormwater Flow
- Materials Storage and Handling Practices
- Minimal Storage of Petroleum Areas

3.1 Industrial Activity and Associated Pollutants

3.1.1 Commonly Used Chemicals and Petroleum Products

The potential pollutants associated with operations at the site are petroleum products stored in equipment, the three (3) ASTs at the facility, and one (1) portable equipment fueling tank. BMT also stores basic cleaning supplies.

There are multiple vehicles as well as heavy machinery active at the site. This equipment includes loading cranes, mobile equipment, tractor trailers, personal cars, etc. There may be petroleum leakage/staining on the gravel under these vehicles and equipment. Because this may happen in open areas, the areas are not protected from stormwater contact.

3.1.2 Outside Material Storage and Stockpiles

Barge loading cranes and other mobile equipment are active at the facility. There may be minor petroleum leakage/staining on the soil under this equipment. Because this may happen in open areas, these areas are not protected from stormwater contact.

Materials stored onsite can either be stored in the enclosed warehouse or stockpiled outside. Items stored outside have the potential to contribute suspended solids or other pollutants to the stormwater flow.

3.1.3 Solid Waste Handling and Disposal

Actions are taken to reduce solid waste generation, including coordination with team members to ensure awareness and participation. Waste is sorted on site in an appropriate bin prior to removal.

3.2 Risk Identification and Summary of Potential Pollutant Sources

The BMT facility is designed such that some potential pollutants may be stored outdoors. The site is also designed so that maintenance, repairs, and fueling may be done on equipment.

In addition to the major potential pollutants, there is an inventory of small quantities of other materials used or stored on site that have potential to contribute pollutants to stormwater runoff. A typical material inventory would consist of petroleum products stored inside equipment and tanks and

general household cleaning products. The material inventory should be updated whenever new materials are used, stored, or produced and when existing listed materials are no longer used at the facility.

3.3 Spills and Leaks

All stormwater runoff from process areas with potential for spills and leaks (i.e., petroleum and chemical storage and handling areas) at the BMT is directed towards outfalls OF001, OF002, and OF003 which discharge to Locust Fork.

There have been no significant spills or leaks in the past three years of oil, toxic, or hazardous pollutants at exposed areas or that drained into a stormwater conveyance.

3.4 Non-Stormwater Discharges Documentation

Non-stormwater discharges are not allowed under ADEM's Individual Stormwater Permit with few exceptions. This following is a list of where potential spills and leaks could occur at the facility that could contribute pollutants to stormwater discharge:

- discharges from firefighting activities;
- potable water sources including waterline flushing;
- irrigation drainage;
- uncontaminated ground water;
- foundation or footing drains;
- springs;
- routine exterior building washing which does not use detergents or other compounds;
- air conditioning condensate.

At the time of development of this BMP Plan, no unauthorized non-stormwater discharges were confirmed.

3.5 Sampling Data and Retention of Records

As described in the NPDES Individual Permit, the BMT will perform sample collection and analysis for discharge at outfalls OF001, OF002, and OF003.

The BMT shall retain records of all monitoring information, including copies of all reports required by the permit and records of all data used to complete the above reports or the application for the NPDES permit for a period of at least three years from the date of the sample measurement, report, application. All records required to be kept for a period of three years shall be kept at the Birmingham Marine Terminal or an alternate location approved by the Department in writing and shall be available for inspection. A complete copy of the permit, the BMP Plan, and most recent BMP inspection records should be maintained at the facility.

4.0 STORMWATER CONTROL MEASURES

BMPs are measures used to prevent or mitigate stormwater from becoming contaminated with pollutants. BMPs are broad-ranging and may include processes, procedures, and structural controls. The BMPs are selected to prevent contamination by stressing the importance of stormwater management and employee awareness of potential pollutant sources.

ADEM's Individual NPDES Permit requires each facility covered by the permit to develop a description of stormwater management controls appropriate for the facility and implement such controls. At a minimum, the stormwater management controls shall address the following components:

- Minimize Exposure;
- Good Housekeeping;
- Preventive Maintenance;
- Spill Prevention and Response;
- Sediment and Erosion Control;
- Management of Runoff;
- Employee Training;
- Waste, Garbage, and Floatable Debris; and
- Dust Generation and Vehicle Tracking of Industrial Materials.

4.1 Minimize Exposure

BMT must implement the following BMPs:

- Conducting minor maintenance and repairs under overhead cover when feasible to control runoff and run-on, and.
- Storing hazardous materials indoors when feasible to control runoff and run-on.

4.2 Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment. A clean work environment reduces the possibility of accidental spills caused by mishandling of chemicals or equipment and should reduce safety hazards to facility personnel. The following good housekeeping measures are routinely implemented in an effort to prevent pollutants from entering stormwater discharges.

- Maintain outside grounds and storage areas in a neat and orderly condition;
- Regularly pick up garbage and waste material and dispose of properly;
- Inspect for signs of leaks or spills underneath and beside vehicles;
- Empty/damaged containers are stored in approved storage/disposal areas to prevent safety hazards or accidents with machinery that could result in oil being leaked from the machinery;
- All containers are covered/closed when not in use. Bulk containers are maintained with secondary containment;
- Inspect all storage containers (AST) prior to receiving, to ensure no damage or leaks.
- Ensure all storage containers are properly labeled.
- Chemicals are not stored outside of activity area;
- Chemical spills are contained so as not to be released to stormwater outfalls;
- Employees are trained in good housekeeping techniques to reduce the possibility of materials being mishandled;
- Maintain an updated inventory list of all chemicals present at the facility and obtain Safety Data Sheets (SDSs) for each;
- Read SDS sheets for safety instructions, recommended storage conditions, and first aid

information, to facilitate spill prevention and safety objectives; and
- Good housekeeping measures are discussed at employee meetings.

4.3 Preventative Maintenance

Facility employees, under the supervision of the Responsible Official, perform routine maintenance for material storage areas. Routine maintenance includes:

- Inspect and maintain stormwater management devices;
- Inspect for leaks and spills, as well as deteriorating conditions of equipment that might lead to leaks or spills, around outdoor product transfer hoses, pumps, piping, valves and ASTs;
- Develop a schedule for routine preventive maintenance identifying the equipment/device to be maintained and personnel responsible for the same;
- Develop and maintain preventive maintenance records to include equipment or system inspected, date inspected, personnel involved, test results, follow-up or corrective actions that were performed, etc.;
- Promptly repair or replace defective pumps, valves, seals and other equipment components found to be defective;
- Replacement and repair of leaking chemical containers in the activity area;
- Inspections of secondary containment and stormwater management structures at least annually and following upset conditions which are capable of damaging the structures; and
- Leak testing of secondary containment structures at intervals not to exceed 10 years.

The preventive maintenance program involves regular inspections and testing of facility equipment. The stormwater preventive maintenance program and BMPs expand the current preventive maintenance program to include stormwater considerations.

4.4 Spill Prevention and Response

Spills and leaks are one of the largest contributors of stormwater pollutants. As part of routine inspections, facility employees attempt to identify potential problems before they develop into environmental hazards. Employees of the BMT correct these problems whenever possible and communicate to the Responsible Official the nature and extent of potential problems.

Should a spill or release be evident, the employee first detecting this condition will immediately contact the Responsible Official or maintenance personnel so that it may be addressed. In these situations, the employee will be the first responder to contain the spill to a small area.

The facility will implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling. All storage containers that could be susceptible to spillage or leakage will be plainly labeled (e.g. "Used Oil," "Diesel," etc.) using appropriate placards or other labels to encourage proper handling and facilitate rapid response if spills or leaks occur.

4.5 Erosion and Sediment Controls

Sediment and erosion control measures are used to protect surface waters from suspended material which can affect water quality. The facility will implement, as needed, erosion and sediment controls, such as:

- Identifying areas which may be susceptible to erosion as a result of topography or other activities;
- Planting vegetation and/or place other protective ground cover to control erosion and create a natural barrier against sediment;
- Constructing structural control features such as dikes, drains, barriers, traps, swales, etc., to

limit erosion; and
- Taking reasonable care to ensure that stormwater will not come into contact with any stockpiled soils.

Ditches, swales, detention ponds, and culverts, etc. will be inspected and maintained annually, at a minimum. Areas of erosion will be repaired by re-establishing a vegetative cover, using mulch and/or straw bale barriers, and, if necessary, placement of velocity dissipaters (such as rip-rap) to slow the run-off and hold soil in-place.

Should erosion affect on-site stormwater management systems, maintenance action should be taken to stop the erosion. This could involve filling washed-out areas with topsoil, grading, stabilization, planting new grass, adding stone rip-rap, or patching or repaving deteriorated paved surfaces.

If construction activity occurs on site, sediment and erosion control must be implemented and monitored in accordance with the Field Guide for Erosion and Sediment Control on construction sites in Alabama. Construction activities will be conducted to minimize the amount of site disturbance and minimize and control erosion and sedimentation through the use of mulch and silt fencing.

4.6 Management of Runoff

Traditional stormwater management practices used to divert, infiltrate, reuse, or otherwise manage stormwater runoff as a means to reduce pollutants in stormwater discharges have been considered. Such traditional runoff management controls typically involve vegetative swales, reuse of collected stormwater, inlet controls such as oil/water separators, detention and retention devices, and similar measures. Runoff at the facility is managed using a number of stormwater management techniques. The off-loading pad is graded to divert runoff from entering the site. The site is graded such that drainage from areas around the buildings and onsite storage area is directed away from the buildings and towards the stormwater sewers.

The need for possible supplemental runoff management BMPs will continue to be evaluated in connection with periodic BMP Plan review and revision. Measures determined to be reasonable and appropriate will be implemented and maintained.

4.7 Activity Specific BMPs

While coal activity is present at the BMT facility, the following BMPs will be required at the facility:

- Maintenance of the access road will be performed in order to support the coal storage/handling operations. These maintenance activities may include grading and the installation of additional gravel.
- Enhanced BMPs will be installed and inspected/maintained following each rain event:
  - Sediment control wattles will be utilized as a secondary BMP to prevent debris and sediment from entering off-site waterbodies.
- The existing detention ponds will be inspected for breaches and repaired, if necessary.

4.7.1 BMPs for Vehicle Fueling Areas

The BMT fueling area includes one (1) 1,000-gallon diesel aboveground storage tank (AST), one (1) 2,000-gallon diesel AST, and one (1) 250-gallon used oil AST. The refueling area is covered with an awning to prevent stormwater contamination.

4.7.2 BMPs for Minimizing Exposure to Stormwater for Outdoor Storage

- Where possible, drums that contain paints, grease, diesel, motor oil, used oil, hydraulic fluids, etc. are to be housed inside where exposure to stormwater is unlikely, these containers should remain housed under overhead cover and not exposed to stormwater any time the containers

are not in use, and containers should be closed or sealed when not in use;

- Provide secondary containment structures for outdoor chemical and petroleum storage areas;
- Immediately contain any spills with absorbent material. Do not wash petroleum spills into conveyances (stream, ditches, etc.);
- Discuss spill control procedures with employees as part of employee training. Encourage employee involvement and suggestions for preventing stormwater pollution;
- Protect the chemical/petroleum containers from vehicle damage by maintaining protective fencing, guards, or posts–or by storing the materials away from traffic;
- Containers should be closed or sealed when not in use;
- Scrap materials and rubbish should be contained within barrels, dumpsters, and roll-off containers and materials should be protected from precipitation with a cover or lid;
- Waste containers or materials should be situated within a building or beneath a canopy;
- Direct stormwater that contacts materials stored outside toward a designated stormwater outfall that has a filter (silt fence, vegetation, rip rap) to allow contaminates to be filtered out of the stormwater; and
- Discuss storage locations, BMP maintenance, and visual inspections with employees as part of employee training.

4.8 Waste, Garbage, and Floatable Debris

The BMT will not allow waste, garbage or floatable debris that would be moved by stormwater to collect on the site. Waste is containerized and transported offsite.

4.9 Dust Generation

While a large portion of the BMT property is unpaved, on-site traffic is minimal, and equipment is moved very short distances at slow speeds, so dust generation is not a significant concern. During times there is significant dust generation, a water truck will be utilized for dust control.

5.0 SCHEDULE AND PROCEDURES FOR MONITORING

The BMT will implement procedures for conducting monitoring as specified by the NPDES Individual Permit.

5.1 Monitoring Locations and Analytes

The BMT will collect required samples from outfalls OF001, OF002, and OF003, as depicted on the Site Map (Figure 2). Based on requirements described in the NPDES Individual Permit, samples will be collected from the outfalls with the frequency and analytes described in Appendix E.

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).

5.2 Monitoring Procedures and Schedule

Monitoring will be performed on a storm event that is greater than 0.1 inch of rainfall (measurable storm event) that results in an actual discharge from the facility that follows the preceding measurable storm event by at least 72 hours. The facility will document the date and duration (in hours) of the rainfall event, rainfall total (in inches) for that rainfall event, time (in days) since the previous measurable storm event (or the absence of measurable precipitation) in the 72 hours preceding the monitoring event.

The sample type collected will be a grab sample. Where feasible, the grab sample should be collected within the first 30 minutes of initial discharge from a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of initial discharge from a measurable storm event, the sample must be collected as soon as practicable after the first 30 minutes and documentation must be retained with the BMP Plan explaining why it was not possible to take samples within the first 30 minutes of initial discharge.

Adverse weather conditions are those conditions that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, electrical storms, or situations that otherwise make sampling impractical, such as drought. When adverse weather conditions prevent the collection of samples according to the relevant monitoring schedule, the facility will take a sample during the next qualifying storm event.

5.3 Monitoring Results Evaluation

If, after collection of the required samples, the value for any parameter exceeds the discharge limitation the facility will, in accordance with Part I.C.2.b. of the Individual Permit, submit to the ADEM Director a written report as provided in Provision I. C. 2. c. below. Such report shall be submitted with the next Discharge Monitoring Report required to be submitted by Provision I. C. 1. of this permit after becoming aware of the occurrence of such noncompliance. The non-compliance notification must 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.

6.0 INSPECTIONS

In addition to monitoring, the facility will conduct inspections that include routine twice-weekly facility inspections. The inspection forms provided in Appendix F will be used during these inspections. The forms will be signed by the inspector and maintained with this Plan for three years.

6.1 Routine Facility Inspections

The facility will conduct a routine facility inspection of all areas where materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the effluent limits contained in the permit (Appendix A). Routine facility inspections will be conducted at least twice-weekly by a qualified member of the Pollution Prevention Team. During the inspections, stormwater drainage areas should be inspected for a visible sheen.

Records for the routine facility inspections shall be maintained in the form of inspection logs (provided in Appendix F), and according to the requirements of the NPDES Individual Permit the logs shall contain the following information, as a minimum:

a. Date and time of weekly inspections;
b. Any cleanup accomplished as a result of the inspections;
c. Time the cleanup was initiated and the time it was completed;
d. Signature of person making visual inspection and performing any cleanup; and
e. Description of any spillage occurring during petroleum handling, which shall include the date and time of the spill, estimated volume of spill, name of the person observing the spill, date and time the spill was cleaned up, and name of the person cleaning up the spill.

7.0 REPORTING AND RECORDKEEPING

Monitoring data collected will be submitted in a format approved by the ADEM which is available online at the following location: https://aepacs.adem.alabama.gov/nviro/ncore/external/home. The facility will use the latest, available report format for the annual reports.

The Discharge Monitoring Reports shall be submitted so that they are received by the Department no later than the 28th of the month following the end of the monitoring period.

The BMT shall retain records of all monitoring information, including all calibration and maintenance records, 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.

8.0 BMP PLAN MODIFICATIONS

This BMP Plan is a "living" document and is required to be modified and updated, as necessary, in response to corrective actions. If this BMP Plan is modified to address a corrective action, then the certification statement of this BMP Plan must be re-signed. For any other BMP Plan modifications, a log will be kept that contains a description of the modification, the name of the person making the modification, and the date and signature of the person making the modification. An example BMP Plan modification log is provided in Appendix G.

The BMP Plan must be updated within 30 days whenever there is a change in design, construction, operation, or maintenance, which has a significant effect on the potential for discharge of pollutants. The BMP Plan will be updated annually on or before January 1 of each year. An updated copy of the BMP Plan will always be available on site. If the site evaluation report indicates changes that have a significant effect on the potential for the discharge of pollutants to surface waters, the BMP Plan shall be amended. These changes may include construction activity or changes in facility operations or maintenance. In addition, modifications to the BMP Plan which improve the effectiveness of the plan shall also be included.

The Responsible Official will have the responsibility for ensuring that the plan is revised and that it reflects current conditions at the facility, and for documenting these revisions to reflect the facility's efforts to control pollution from stormwater runoff.

9.0 SIGNATORY REQUIREMENTS

Records and information such as Notices of Intent (NOIs), Discharge Monitoring Reports (DMRs), Notices of Termination (NOT), BMP Plans, reports, and certifications have specific signatory requirements. For a corporation, the records shall be signed by a responsible corporate officer. For the purpose of this permit, a responsible corporate officer is defined as:

a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation;

For reports, BMP Plans, and other certifications, signatures will be by a person as described above or by a duly authorized representative of that person. A person is a duly authorized representative if:

(1) authorization is made in writing by a person described above and submitted to the ADEM; and
(2) authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of manager, operator, or superintendent.

If the authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of this section must be submitted to ADEM.

For certification of reports, BMP Plans, and other documentation, the following certification statement will be used:

"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 gathered and evaluated 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."

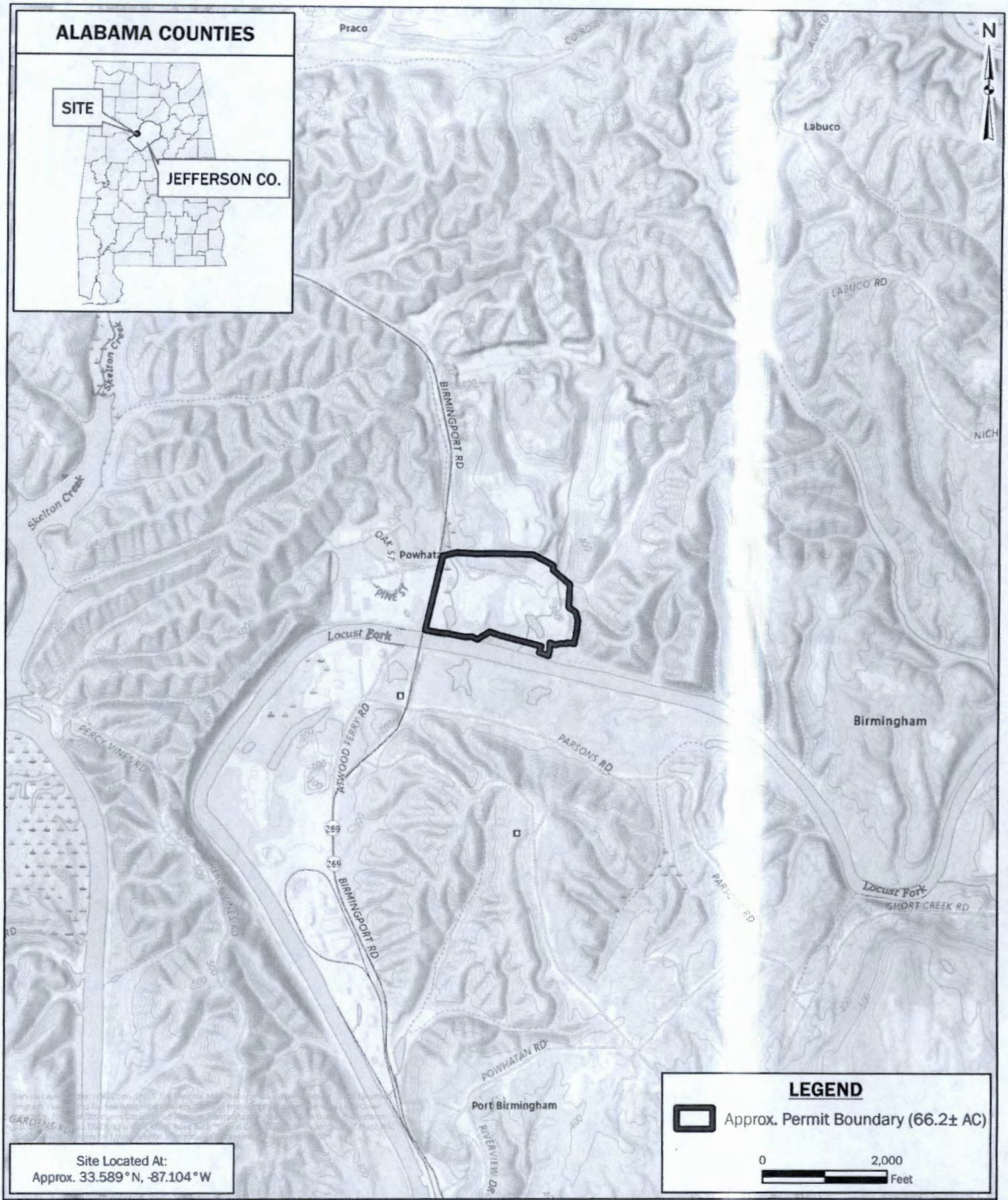
APPENDIX A

ADEM NPDES INDIVIDUAL PERMIT

APPENDIX B

FIGURES

Figure 1 Site Location & Topographic Map
Figure 2 Site Map



TTL

FIGURE 1: SITE LOCATION & TOPOGRAPHIC MAP

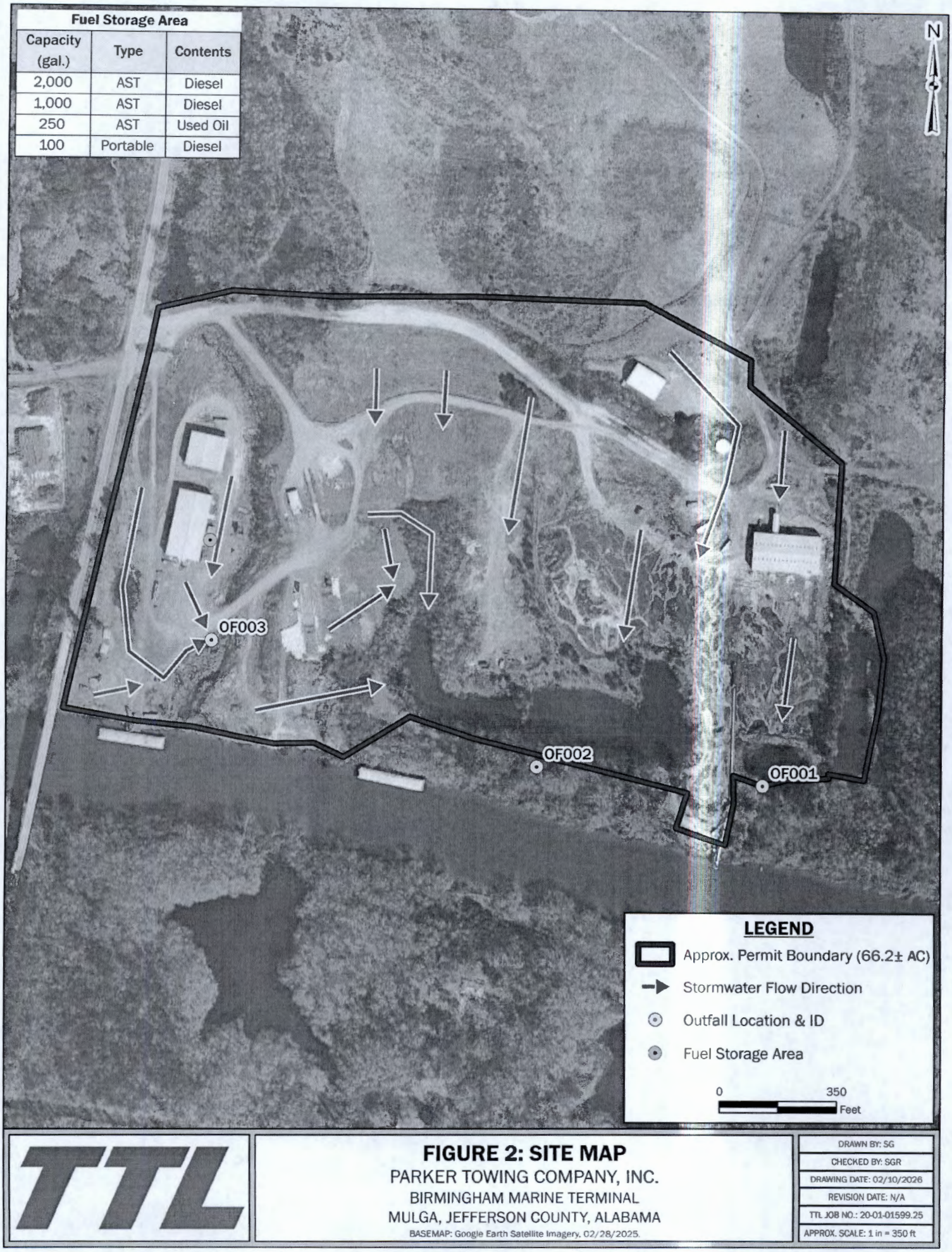
PARKER TOWING COMPANY, INC.

BIRMINGHAM MARINE TERMINAL

MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: USGS Topo Maps (See Service Layer Credits).

DRAWN BY:	SG
CHECKED BY:	SGR
DRAWING DATE:	02/10/2026
REVISION DATE:	N/A
TTL JOB NO.:	20-01-01599.25
APPROX. SCALE:	1 in = 2,000 ft



TTL

FIGURE 2: SITE MAP

PARKER TOWING COMPANY, INC.
BIRMINGHAM MARINE TERMINAL
MULGA, JEFFERSON COUNTY, ALABAMA

BASEMAP: Google Earth Satellite Imagery, 02/28/2025.

DRAWN BY: SG
CHECKED BY: SGR
DRAWING DATE: 02/10/2026
REVISION DATE: N/A
TTL JOB NO.: 20-01-01599.25
APPROX. SCALE: 1 in = 350 ft

APPENDIX C

STORMWATER POLLUTION PREVENTION TEAM

POLLUTION PREVENTION TEAM

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

Team members are key people on-site who are most familiar with the facility and its operations. The activities and responsibilities of the team will address all aspects for the facility's plan. They should provide adequate structure and direction to the facility's entire Stormwater management program.

While a designated Pollution Prevention Team can be assigned the job of developing and implementing the Stormwater Pollution Prevention Plan, facility management is ultimately responsible for the implementation of the plan and for compliance with all applicable Stormwater requirements.

The Pollution Prevention Team consists of the following members:

Team Leader:	Aaron Key
Title	Port Manager
Work Phone:	Mobile: (205) 534-0745
Responsibilities:	Coordinate all stages of Plan development and implementation; coordinate employee training; ensure corrective actions are taken regarding observations made during quarterly site inspections; keep all records and ensure reports are submitted.

Co-Leader:	Eric Pearson
Title:	Regional Operations Manager
Work Phone:	Mobile: (205) 454-0143
Responsibilities:	Assist Leader in coordinating all aspects of Plan implementation, employee training, corrective actions, site inspections.

APPENDIX D

RECORD OF PERSONNEL TRAINING

BEST MANAGEMENT PRACTICES PLAN

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

RECORD OF PERSONNEL TRAINING

At least annually, employees should be trained on the stormwater pollution prevention procedures, BMPs, and spill prevention and control procedures for this facility. This training will be held so that all employees are familiar with the requirements as stated in this document. This training can be done in concurrence with other employee training.

Name (Print)	Signature	Date

APPENDIX E

MONITORING LOCATIONS AND ANALYTES

APPENDIX F

TWICE-WEEKLY INSPECTION FORM

FACILITY INSPECTION CHECKLIST

TWICE-WEEKLY INSPECTION FORM

Parker Towing Company, Inc.
8701 Birmingport Road
Mulga, Jefferson County, Alabama

Instructions: This inspection record will be completed twice-weekly by the *Responsible Person* or designated personnel. Place an *X* in the appropriate box for each item. If any response requires elaboration, descriptions or actions taken should be attached on a separate piece of paper, and added to the log book.

Birmingham Marine Terminal **Mulga, Alabama** **Inspectors (Name/Title):**	Date and Time:		Date and Time:		Date and Time:		Date and Time:	
Inspectors Initials:								
Stormwater Drainage Area	Yes	No	Yes	No	Yes	No	Yes	No
Is the outfall free of accumulated debris? If not, specify the location and the corrective action or anticipated corrective action.								
Is adequate gravel provided onsite in traffic areas? If not, specify which areas need additional gravel.								
Are erosion control measures effective? If not, specify location and area of concern.								
Are stormwater BMPs in place and effective? If not, specify location and area of concern.								
Chemical and Petroleum Storage	Yes	No	Yes	No	Yes	No	Yes	No
Is secondary containment provided for each bulk storage container of petroleum product/chemical of 55 gallons or more? If not, specify below which container does not have secondary containment.								
Are drain plug/valves in containment unit in place/closed? If not, specify action and date taken.								
Has water accumulated within any of the containment units (spill pallet/concrete containment)? If so, specify which tank(s) below.								
Are containment units free of debris and oil residue? If not, specify which containment unit below.								
Are there any signs of corrosion visible on the bulk storage containers? If so, specify which container/equipment below.								
Is evidence of leaking fluid visible on or around vehicles or equipment onsite?								
Is a sheen visible within the containment areas?								
If a spill of petroleum/chemical product has occurred since the last inspection, was spilled material cleaned up to the extent practical, and stain soil removed?								
Explain any deficiencies noted above. List anticipated corrective actions and date for action for each.								

APPENDIX G

FIVE-YEAR PLAN SUMMARY PAGE

BEST MANAGEMENT PRACTICES PLAN

Birmingham Marine Terminal
8701 Birmingport Road
Mulga, Jefferson County, Alabama

FIVE YEAR PLAN SUMMARY PAGE

A review and evaluation of this BMP Plan should be performed at a set interval. Any changes that are to be made should be done so as soon as possible.

By signing the log below, I certify that *I have completed review and evaluation of the BMP Plan for the BMT on the date shown and will amend the Plan (if indicated in the log) as a result.*

Reviewer Name (Signature)	Reviewer Name (Print)	Date	Will Plan Be Amended? (Yes/No)	P.E. Certification Required? (Yes/No)