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Alabama Department of Environmental Management
adem.alabama.gov

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

January 25, 2024

Mr. Richard Pennington
Continental Aerospace Technologies, Inc.
2039 South Broad Street
Mobile, AL 36615

RE: **UIC PERMIT NUMBER ALSI9949686**
Continental Aerospace Technologies, Inc.
2039 South Broad Street
Mobile, Mobile County, AL

Dear Mr. Pennington:

A **Draft** copy of the permit is enclosed for your review.

If you have any comments on the draft permit, please submit them to this office **within the next thirty (30) days** so that any issues of concern might be resolved.

If you have any questions concerning this permit, please contact me at (334) 271-7959 or jessica.spence@adem.alabama.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Spence".

Jessica Spence
UIC Program

Enclosure

JS/

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

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



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608-1211
(251) 304-1176
(251) 304-1189 (FAX)



UNDERGROUND INJECTION CONTROL PERMIT

PERMITTEE: Continental Aerospace Technologies, Inc.

FACILITY/LOCATION: Continental Aerospace Technologies, Inc.
2039 South Broad Street
Mobile, Mobile County, Alabama
Lat: N 30.644703°/Long: W -88.072636°

PERMIT NUMBER: ALSI9949686

INJECTION WELL CLASS: Class V

SOURCE OF POLLUTANTS: Injection of sodium persulfate and sodium hydroxide to aid in the remediation of existing contamination.

In accordance with and subject to the provisions of the Safe Drinking Water Act, as amended, 42 U.S.C. §§ 300f-300j (the "SDWA"), 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-15, 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 construct and operate injection well(s) of the above-described class.

ISSUANCE DATE:

EFFECTIVE DATE:

EXPIRATION DATE:

PART I Authorization to Operate

- A. The permittee is authorized to operate a Class V Injection Well(s), at the facility described in the permit application and in the cover page of this permit, in accordance with the provisions set forth in this permit.
- B. This permit and the authorization to inject shall remain in effect until the expiration date stated on the cover page of this permit. If the permittee desires to continue injection past the expiration date of this permit, the permittee shall request a permit reissuance at least 180 days prior to expiration of this permit.

PART II Construction Requirements

- A. Injection Well Requirements
 - 1. The permittee shall inject only sodium persulfate and sodium hydroxide solution as described and approved in the permit application.
 - 2. The permittee shall provide a means of sampling the injection fluid prior to injection.

B. Modifications

Approval of the Alabama Department of Environmental Management (ADEM) shall be obtained prior to modification of any injection well or supporting surface. Modification shall mean any action that will change the configuration of the well beneath the surface, the methods of monitoring injection, or will result in injection of a fluid not specifically authorized by this permit.

PART III Monitoring and Operating Requirements

A. Injection Fluid

The permittee shall not inject any substance that is defined as hazardous or toxic by Federal or State laws or regulations or any substance not identified in the application for this permit. The proposed use of substances other than those identified in the permit application must be reviewed and approved by the ADEM prior to use.

2. Monitoring Wells

- 1. The permittee shall monitor and limit groundwater in accordance with Appendix A. The injection activity shall not result in the exceedance of any established MCL in groundwater outside the areas of contamination.
- 2. The groundwater monitoring regime must be sufficient to detect any adverse effects to groundwater quality due to the injection activity. The Department may change the sampling requirements if the sampling data indicate the need to do so.
- 3. Monitoring wells shall be sampled for background water quality prior to injection.

C. Operation

The injection well operated under this permit shall function properly and injection fluid shall not surface or saturate the uppermost soil layer. Should the injection well fail to function properly, the permittee shall take corrective action, to include cessation of injection, as required by ADEM.

PART IV Records, Reports, & Submittals

A. Records

1. The permittee shall retain all records concerning the data used to complete the permit application, the operation of the wells, and the nature and composition of pollutants injected; to include records of the calibration of instruments, meters and gauges, quality control records, and recordings from continuous monitoring instrumentation; until at least three years after the closure of well(s).
2. When requested by ADEM, the permittee shall deliver to ADEM copies of any of the records maintained in accordance with this permit.

B. Reports

1. The permittee shall submit to ADEM written confirmation of all injection of chemical oxidations that occur, including the initial injection. The written confirmation shall be submitted no later than thirty (30) days after the ORC's are injected and shall include the information listed below:
 - a) The date of the injection.
 - b) The amount of sodium persulfate and sodium hydroxide solution injected.
 - c) The location(s) of the injection.
2. The permittee shall submit to ADEM written notification of any subsequent injections that are to occur after the initial injection of materials. The written notification shall be submitted at least thirty (30) days prior to the subsequent injections and shall include the information listed below:
 - a) The date of the proposed injection.
 - b) The amount of material proposed for injection.
 - c) The location(s) for the proposed injection.
3. The permittee shall report to ADEM any of the following:
 - a) Any planned action which will change the use of the injection wells, will result in injection of a fluid different from that authorized by this permit, will change the method of operations of any injection well, or will change the method of the monitoring of well operations or injected fluids.

- b) Any planned transfer of ownership of all or part of the permitted facility.
 - c) Any relevant facts of which the permittee becomes aware which should have been submitted in a permit application and any corrections to data previously submitted in a permit application.
4. Other Submittals

Studies, engineering reports, plans and specifications, plugging and abandonment plans, logging reports, and other technical documents submitted to comply with this permit shall be prepared by or under the supervision of qualified persons defined by Rule 6-8-.13 of the UIC Regulations of the ADEM.

PART V Plugging and Abandonment

The permittee shall perform any abandonment and closure actions that may be required by ADEM to remove a threat to groundwater quality or to the health of persons which is caused by the injection activity.

PART VI Permit Modification, Revocation, Suspension, and Termination

- A. ADEM may impose emergency additional conditions to this permit when necessary to protect waters of the state from pollution. These conditions may include suspension of the permit to inject and shall remain in effect until the permit is modified, revoked, suspended or terminated in accordance with Rules 6-8-.12(a)3-5 and 6-8-.12(f) of the UIC Regulations of the ADEM.
- B. Non-emergency permit modification, revocation, suspension, and termination actions shall be accomplished in accordance with ADEM Administrative Code Rule 335-6-8.

PART VII General Provisions

- A. The permittee shall comply with all provisions of the UIC Regulations of the ADEM and shall comply with all provisions of this permit and shall reduce or halt injection if needed to maintain compliance with the permit and regulations.
- B. The permittee shall comply with all applicable Federal and State hazardous waste management regulations.
- C. The permittee shall allow members of the ADEM staff to:
 - 1. Access property and records of the permittee for purposes of inspection.
 - 2. Collect samples of the injected fluids, process and wastewater streams associated with the permitted injection wells.
 - 3. Collect samples from any monitoring wells.
 - 4. Obtain copies of records upon request.
- D. The permittee shall immediately take all reasonable steps to minimize or correct any adverse environmental impact resulting from the operation of the permitted injection wells.

- E. This permit does not convey any property rights of any sort, or any exclusive privilege.
- F. The filing of a request by the permittee for a permit modification, revocation, and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- G. Any noncompliance with this permit constitutes a violation of the Alabama Water Pollution Control Act and/or the Underground Injection Control Regulations and is grounds for enforcement action such as permit termination, revocation, modification; or denial of a permit renewal application.
- H. Injection to waters of the state, which in this case is groundwater, in accordance with this permit shall not result in the exceedance of a Maximum Contaminant Level (MCL) as established by the Environmental Protection Agency. Injection to groundwater, in accordance with this permit shall not result in a violation of a surface water quality standard.
- I. All provisions of ADEM Code Rule 335-6-8.12 are incorporated as terms and conditions of this permit by reference.
- J. The permittee authorized to discharge under this permit, who wishes to continue to discharge upon the expiration of this permit, shall submit an application for reissuance, using the Department's Alabama Environmental Permitting and Compliance System (AEPACS), unless the Permittee submits in writing valid justification as to why the electronic submittal process cannot be utilized and the Department approves in writing the utilization of hard copy submittals. The AEPACS can be accessed at the following link: <http://adem.alabama.gov/AEPACS>. Such application shall be submitted at least 180 days prior to the expiration date of this permit. Permit requests for initial issuance and modifications of the existing permit should all be submitted through the AEPACS system.

APPENDIX A

Groundwater monitoring wells shall be sampled prior to setup and then as specified below. The following sampling parameters shall be reported to ADEM after each monitoring event:

<u>GROUNDWATER CHARACTERISTICS</u>	<u>UNITS</u>	<u>DISCHARGE LIMITS</u>	<u>MONITORING REQUIREMENTS</u>	
			<u>FREQUENCY</u>	<u>SAMPLE TYPE</u>
pH	Standard	Report	Quarterly	Grab
Sodium	mg/L	Report	Quarterly	Grab
Sulfate	mg/L	Report	Quarterly	Grab

DRAFT

ADEM Permit Rationale

Date: January 18, 2024
Prepared By: Jessica Spence

Permittee Name: Continental Aerospace Technologies, Inc.
c/o Mr. Richard Pennington
2039 South Broad Street
Mobile, AL 36615

Facility/Site Name: Continental Aerospace Technologies, Inc.

Location: 2039 South Broad Street
Mobile, Mobile County, AL 36615
Latitude: 30.644703/Longitude: -88.072636

UIC Permit Number: ALSI9949686

Draft permit is: Reissuance

Injection Description: Injection of sodium persulfate and sodium hydroxide to aid in the remediation of existing contamination.

Discussion: Standard permit drafted.

1. No hazardous injection
2. Sampling point required
3. No Best Management Practices required
4. AEPACS required to be utilized for permit reissuances/modifications/transfers